



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

September 16, 1999

4APT-ARB

Mr. J. Carter S. Gray, Manager  
Pollution Control Section  
Memphis-Shelby County Health Department  
814 Jefferson Avenue, Suite 437  
Memphis, Tennessee 38105

SUBJ: EPA's Review of Proposed Title V Permit  
Buckeye Technologies, Inc.  
Permit No. 0055-01TV

Dear Mr. Gray:

The United States Environmental Protection Agency (EPA) has reviewed the proposed title V operating permit for the Buckeye Technologies facility located in Memphis, Tennessee. Based on the review of the proposed permit and the supporting information for this facility, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 CFR 70.8(c), to the issuance of the title V permit for this facility. The basis for EPA's objection is that the permit does not contain adequate periodic monitoring, as required by 40 CFR 70.6(a)(3), to assure practical enforceability.

Section 505(b)(1) of the Act and 40 CFR 70.8(c) require EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 CFR Part 70. Pursuant to 40 CFR 70.8(c), this letter provides a statement of the reason(s) for EPA's objection and a description of the terms and conditions that the permit must include to respond to the objection.

Specifically, the following items are deficient in the proposed permit for Buckeye Technologies, Inc.:

1. The frequencies specified in the Monitoring Plan of Appendix A for conducting opacity observations of the various scrubbers and cyclones (e.g., weekly) as well as the boilers (e.g., semi-annually) are inadequate for assuring ongoing compliance with the respective opacity standards. The permit should include a requirement for the source to conduct daily walk-through or "spot" observations of the scrubbers and cyclones. Similarly, for the boilers, the permit should include a requirement to conduct daily spot observations when oil is being burned. Opacity measurements using Reference Method 9 should be required if visible emissions have been observed from these emission units. Daily

records of the results of these observations (including whether or not visible emissions were observed, whether natural gas or oil was burned in the boilers, etc.) should also be maintained. EPA believes such an increase in monitoring frequency is essential because it provides immediate environmental benefit by allowing for prompt detection and correction of malfunctions without added undue burden on the source.

2. Assuring ongoing compliance with the standards for volatile organic compounds (VOCs) and chloroform (on both an hourly and annual basis) by method of calculation based on cotton linter throughput using respective emission factors is inadequate because it is not an accurate reflection of the actual emissions from the facility. The permit should require sufficient periodic monitoring requirements (e.g., parametric monitoring) that provide reasonable assurance of ongoing compliance.

40 CFR 70.8(c)(4) and Section 505(c) of the Act provide that if the Department fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA, and EPA will act accordingly. Because the objection issues must be fully addressed within 90 days, we suggest that the revised permit be submitted with sufficient advance notice so that any outstanding issues may be resolved prior to the expiration of the 90-day period.

We are committed to working with you to resolve these issues. Please let us know if we may provide assistance to you and your staff. If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Air Permitting Section at (404) 562-9141. Should your staff need further assistance, they may also contact Scott Miller, Memphis-Shelby County Title V Contact, at (404) 562-9120.

Sincerely,

/s/

Winston A. Smith  
Director  
Air, Pesticides and Toxics  
Management Division

cc: Buckeye Technologies, Inc.