



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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GOVERNOR

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COMMISSIONER

**Verso Bucksport, LLC
Hancock County
Bucksport, Maine
A-22-70-G-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #4**

After review of the Part 70 License 502(b)(10) Change application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Facility	Verso Bucksport, LLC (Verso Bucksport)
License Amendment Type	Part 70 Section 502(b)(10) Change
NAICS Code	322121 (pulp mill that produces paper)
Nature of Business	Groundwood and thermomechanical pulp; papermaking
Part 70 License Number and Issuance Date	A-22-70-I-A December 30, 2004
Amendment Issuance Date	October 13, 2011

Verso Bucksport has submitted a Part 70 Section 502(b)(10) application to clarify language in the Part 70 license to state that the Boiler #8 opacity monitor is not required when firing on natural gas only.

B. Emission Equipment

The emission unit addressed in this amendment is Boiler 8 (814 MMBtu/hr, multi-fuel).

C. Application Classification

The application for Verso Bucksport does not include the licensing of increased emissions or the installation of new or modified equipment. It does not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements. The Boiler 8 natural gas opacity monitor request is a license wording clarification and not a change in applicable requirements. Therefore, the license application is

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considered to be a Part 70 Section 502 (b)(10) Change and was processed through *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended).

II. PART 70 SECTION 502(b)(10) CHANGES

Boiler 8 is an 814 MMBtu/hr multi-fuel boiler and is subject to *Standards of Performance for Fossil-Fuel-Fired Steam Generators for which Construction is Commenced after August 17, 1971*, 40 CFR Part 60, Subpart D and *Source Surveillance – Emissions Monitoring*, 06-096 CMR 117 (as amended). Condition 15(H) in air emission license A-22-70-A-I states that ‘compliance with the opacity limit on the Boiler 8 stack shall be demonstrated by a continuous opacity monitoring system (COM) and the COM shall be maintained and operated in accordance with Chapter 117 and 40 CFR Part 60, Section 60.45.’

Verso Bucksport has requested clarification of the wording in condition 15(H) of A-22-70-A-I since 06-096 CMR 117 (as amended) does not require an opacity monitor for natural gas firing only and 40 CFR Part 60, Section 60.45 also has exemptions from opacity monitoring. Boiler 8 is currently licensed to operate without the electrostatic precipitator when firing natural gas only.

06-096 CMR 117, Section (1)(B)(1)(a) states: ‘Fuel-burning equipment with a heat input capacity of greater than 100 million British Thermal Units (BTU) per hour shall continuously monitor for opacity, except when: (a) Gaseous fuel is the only fuel burned.’ (emphasis added)

40 CFR Part 60, Section 60.45 b(1) states: ‘Certain of the CEMS requirements under paragraph (a) of this section do not apply to owners or operators under the following conditions: (1) For a fossil-fuel-fired steam generator that burns only gaseous or liquid fossil fuel (excluding residual oil) with potential SO₂ emissions rates of 26 ng/J (0.060 lb/MMBtu) or less and that does not use post-combustion technology to reduce emissions of SO₂ or PM, CEMS for measuring the opacity of emissions and SO₂ emissions are not required if the owner or operator monitors SO₂ emissions by fuel sampling and analysis or fuel receipts.’ (emphasis added)

40 CFR Part 60, Section 60.45 b(7) states: An owner or operator of an affected facility subject to an opacity standard under §60.42 that elects to not use a COMS because the affected facility burns only fuels as specified under paragraph (b)(1) of this section, monitors PM emissions as specified under paragraph (b)(5) of this section, or monitors CO emissions as specified under paragraph (b)(6) of this section, shall conduct a performance test using Method 9 of appendix A-4 of this part and the procedures in §60.11 to demonstrate compliance with the applicable limit in §60.42 by April 29, 2011 or within 45 days after stopping use of an existing COMS, whichever is later, and shall comply with either paragraph (b)(7)(i), (b)(7)(ii), or (b)(7)(iii) of this section. The observation period for

Method 9 of appendix A-4 of this part performance tests may be reduced from 3 hours to 60 minutes if all 6-minute averages are less than 10 percent and all individual 15-second observations are less than or equal to 20 percent during the initial 60 minutes of observation. The permitting authority may exempt owners or operators of affected facilities burning only natural gas from the opacity monitoring requirements. (emphasis added)

The Department shall reword condition 15(H) to include an exemption from the COMS requirement when firing natural gas only in Boiler 8, as allowed by 06-096 CMR 117 (as amended) and 40 CFR Part 60, Section 60.45. As required in 40 CFR Part 60, Section 60.45 (b)(1) Verso Bucksport shall maintain records of natural gas sulfur content to verify that SO₂ emissions are less than 0.060 lb/MMBtu. No COM or Method 9 monitoring will be required when firing on natural gas only.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this source:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-22-70-G-A subject to the statements and conditions found in Air Emission License A-22-70-A-I, amendments A-22-70-C-A, A-22-70-E-A, and A-22-70-F-A and in the following conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 CMR 115 for making such changes and pursuant to the applicable requirements in 06-096 CMR 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

SPECIAL CONDITIONS

The following shall replace Condition 15(H) in Air Emission License A-22-70-A-I:

(15) Boiler 8 (multi-fuel boiler)

H. Opacity Compliance

1. Compliance with the opacity limit on the boiler 8 stack shall be demonstrated by a continuous opacity monitoring system (COM) and the COM shall be maintained and operated in accordance with 06-096 CMR 117 (as amended) and 40 CFR Part 60, Section 60.45.
2. As allowed in 06-096 CMR 117 (as amended) and 40 CFR Part 60, Section 60.45, the COM is not required to be operated when firing natural gas only in boiler 8 as long as Verso Bucksport maintains records of natural gas sulfur content to verify that SO₂ emissions are less than 0.060 lb/MMBtu (40 CFR §60.45(b)(1)). Verso Bucksport is exempt from the Method 9 visible emissions performance test on natural gas only as allowed by 40 CFR §60.45(b)(7).

[40 CFR Part 60.45 and 06-096 CMR 117]

DONE AND DATED IN AUGUSTA, MAINE THIS 13th DAY OF October, 2011.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:



PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-22-70-A-I.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 8, 2011

Date of application acceptance: August 8, 2011

Date filed with the Board of Environmental Protection:

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.

