



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI  
GOVERNOR

BETH NAGUSKY  
ACTING COMMISSIONER

Woodland Pulp, LLC  
Washington County  
Baileyville, Maine  
A-215-77-3-M

Departmental  
Findings of Fact and Order  
New Source Review  
Amendment #7

After 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, § 582, § 590 and § 603, the Department finds the following facts:

**I. REGISTRATION**

A. Introduction

FACILITY	Woodland Pulp, LLC (WP)
INITIAL LICENSE NUMBER	A-215-70-A-I
LICENSE TYPE	06-096 CMR 115, Minor Revision
NAICS CODES	32211
NATURE OF BUSINESS	Pulp Production
FACILITY LOCATION	Baileyville, Maine
DETERMINATION ISSUANCE DATE	November 5, 2010

B. Amendment Description

WP was issued Air Emission License A-215-70-A-I on December 22, 2004. This License has subsequently been amended six times. WP has requested that their License be amended to alter the emission limits associated with the #9 Power Boiler.

C. Application Classification

The application for WP does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping. This application does not increase the overall emissions from WP. Therefore, this application is classified as a Minor Revision and has been processed as such.

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## II. BEST PRACTICAL TREATMENT (BPT)

### A. #9 Power Boiler

The #9 Power Boiler was subject to a RACT Determination in 1986 as the WP facility was in a nonattainment area for Particulate Matter (PM). This area has subsequently been classified as in attainment. Based on an EPA Applicability Determination requested by Delco Products in Montgomery County, Ohio on March 16, 1983, a facility may alter permitting requirements that were based on the attainment/nonattainment status of an area when that status is re-designated. This Determination states the following:

*“EPA can allow the relaxation of a permitting requirement within the constraints of the State or local agency’s authority. The original permitting requirements were based on the nonattainment status of the Montgomery County, Ohio area. Inasmuch as this area has now been designated to attainment, EPA can no longer require the continued application of the nonattainment requirements. As long as any relaxed emission limit will not interfere with the maintenance of the National Ambient Air Quality Standards nor any applicable air quality increment, such a relaxation can be approved.”*

WP has therefore requested that the PM emission limits for #9 Power Boiler be altered to 0.22 lb/MMBtu from 0.15 lb/MMBtu, and 84.4 lb/hr from 93.8 lb/hr. The 10% reduction in lb/hr emissions from the current limit of 93.8 lb/hr will result in an overall reduction in potential PM emissions from #9 Power Boiler despite an increase in lb/MMBtu emissions from the current limit of 0.15 lb/MMBtu. The Department therefore approves the alteration of the #9 Power Boiler PM emission limits as detailed in the Streamlining section:

### Streamlining

#### Particulate Matter (PM)

- a. WP accepts streamlining for PM requirements. Fuel Burning Equipment Particulate Emission Standard, 06-096 CMR 103 (as amended), section 2(A)(3)(b) is applicable to the #9 Power Boiler. A PM emission limit of 0.22 lb/MMBtu is more stringent than 06-096 CMR 103 and shall be considered the only BPT emission limit.
- b. BPT establishes the only applicable PM lb/hr emission limit of 84.4 lb/hr. **No streamlining is required.**

B. Incorporation into the Part 70 Air Emission License

The requirements in this 06-096 CMR 115 New Source Review amendment shall apply to the facility upon amendment issuance. Per *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended), Section 2(J)(2)(d), for a modification that has undergone NSR requirements or been processed through 06-096 CMR 115, the source must then apply for an amendment to the Part 70 license within one year of commencing the proposed operations as provided in 40 CFR Part 70.5.

C. Facility Emissions

**Total Licensed Annual Emissions for the Facility**  
**Tons/year**  
 (used to calculate the annual license fee)

<b>Equipment</b>	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>	<b>TRS</b>
#9 Power Boiler	355	355	676	780	5008	130	-
#3 Recovery Boiler	189	189	1567	601	983	176	-
Smelt Dissolving Tank	50	50	-	-	-	-	13.6
Lime Kiln	87	87	35	175	1750	-	-
Package Boiler	56	56	9.9	5.6	1.4	0.06	-
NCG Incinerator	8.4	8.4	12.7	39.6	2.8	0.2	-
<b>TOTALS</b>	<b>745.4</b>	<b>745.4</b>	<b>2300.6</b>	<b>1178.0</b>	<b>7745.2</b>	<b>306.3</b>	<b>13.6</b>

- Please note that the total NO<sub>x</sub> limit for the mill is less than total allowable emissions from individual units. Domtar may emit up to each required limit for any one individual unit, provided that the total of all units does not exceed the mill wide total of 1178 ton/yr (on a 12 month rolling total).
- PM10 and CO are not used in the calculation of the annual fee but are included in this table for completeness.
- Emissions limits in the table do not include insignificant activities and process units (e.g. woodyard) which have no licensed emission limits.

### III. AMBIENT AIR QUALITY ANALYSIS

WP previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this revision.

### ORDER

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

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

The Department hereby grants Air Emission License A-215-77-3-M subject to the following conditions.

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 Special Condition 14(A) in License A-215-70-A-I.

(14) #9 Power Boiler

A. Emissions from the #9 Power Boiler shall not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority	Avg Time
PM	0.22	BPT	-
SO <sub>2</sub>	0.30	BPT, BART	24 hr block
NO <sub>x</sub>	0.40 <sup>1</sup>	06-096 CMR 138, NO <sub>x</sub> RACT	24 hr block

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Pollutant	lb/hr	Origin and Authority	Avg Time
PM	84.4	BPT	-
PM <sub>10</sub>	84.4	BPT, Enforceable by State Only	-
SO <sub>2</sub>	186	BPT, Enforceable by State Only	3 hr block
NO <sub>x</sub>	186 <sup>2</sup>	BPT	24 hr block
CO	1192.4	BPT, #A-215-71-B-A/R, Enforceable by State Only	-
VOC	31.3	BPT, Enforceable by State Only	-

1. See Condition 14(U) regarding compliance and for an alternative to this limit by combining NO<sub>x</sub> emissions with the #3 Recovery Boiler.
2. See Condition 16 for an alternative to this limit by combining NO<sub>x</sub> emissions with Recovery Boiler #3.

The following is a new Condition:

1. WP shall apply for an amendment to the Part 70 license within one year of commencing the operations proposed in this 06-096 CMR 115 amendment as provided in 40 CFR Part 70.5.

DONE AND DATED IN AUGUSTA, MAINE THIS 5th DAY OF November 2010.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:



BETH NAGUSKY, ACTING COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/6/2010

Date of application acceptance: 10/7/2010

Date filed with the Board of Environmental Protection: \_\_\_\_\_

This Order prepared by Jonathan Voisine, Bureau of Air Quality.



