



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE  
GOVERNOR

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COMMISSIONER

**Woodland Pulp, LLC  
Washington County  
Baileyville, Maine  
A-215-70-K-A**

**Departmental  
Findings of Fact and Order  
502(b)(10) Change  
Amendment #1**

After review of the license amendment 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	Woodland Pulp, LLC (WPLLC)
CURRENT LICENSE NUMBER	A-215-70-I-R/A
LICENSE TYPE	06-096 CMR 140, 502(B)(10) Change
NAICS CODES	32211
NATURE OF BUSINESS	Pulp Production
FACILITY LOCATION	Baileyville, Maine

**B. Amendment Description**

WPLLC was issued Air Emission License A-215-70-I-R/A on November 18, 2011. Special Condition (14)B of the license states that the #9 Power Boiler, which has a maximum firing rate of 740 MMBtu/hr, is limited to a firing rate of 625 MMBtu/hr except when the #3 Recovery Boiler is down, as described in Special Condition (14)C. No reason for the restriction is specified in the Findings of Fact of the license or in the application on file. WPLLC has requested that their License be amended to remove the MMBtu/hr restriction from #9 Power Boiler to allow for more operational flexibility. No emission limits for the #9 Power Boiler or the overall facility will be altered by this change.

Special Condition (14)D of License A-215-70-I-R/A requires documentation of dates and times when the #3 Recovery Boiler is offline or in a period of startup or shutdown and the kraft mill and the pulp dryer are not operating. Because there is no reason to require such documentation with no #9 Power Boiler limitation below its maximum design heat input of 740 MMBtu/hr, the Department finds that an Administrative Revision per 06-096 140 (7), *Part 70 Administrative Revision*, is appropriate for removal of Special Condition (14)D of License A-215-70-I-R/A.

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The Department therefore approves the request by WPLLC to remove Conditions (14)B, (14)C, and (14)D from Air Emission License A-215-70-I-R/A.

During preparation of this license amendment, the Department found it appropriate to change the wording in an additional portion of Special Condition (14) to more clearly convey the requirements of the compliance assurance monitoring portion of the condition. Thus, Special Condition (14)P in the Part 70 license renewal of 11/2012 has been reworded as Special Condition (14)M in this amendment.

C. Application Classification

The modification of a major source is considered a major modification or not based on whether expected emissions increases exceed the "Significant Emission Increase Levels" as given in *Definitions Regulation*, 06-096 CMR 100 (as amended). No changes to emission or fuel use limitations are being proposed in the amendment application, and no reporting or monitoring requirements will be altered. Therefore, this Licensing action is considered a Part 70 502(b)(10) change and a Part 70 administrative revision and has been processed as such.

II. **BEST PRACTICAL TREATMENT (BPT)**

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions of Air Pollution Control Regulations*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

06-096 CMR 100 (as amended) defines a modification as "... any physical change in or change in the method of a source that would result in the emission increase of any regulated pollutant...." A BACT analysis is not required for the #9 Power Boiler because no changes will be made, and no increases in emissions are expected as a result of this License.

### III. AMBIENT AIR QUALITY ANALYSIS

WPLLC 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 change.

### ORDER

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

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

The Department hereby grants Air Emission License A-215-70-K-A 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.

No emission limits are being altered by this License. The renumbering of Special Condition 14 will result in the following format changes to License A-215-70-I-R/A.

### SPECIAL CONDITIONS

The following shall replace Special Condition (14), (15)A, and (16)B in Air Emission License A-215-70-I-R/A.

This condition replaces Special Condition (14) in Air Emission License A-215-70-I-R/A:

(14) #9 Power Boiler

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

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>Origin and Authority</u>	<u>Averaging Time</u>
PM	0.22	BPT, BART (A-215-77-2-A)	--
SO <sub>2</sub>	0.30 <sup>1</sup>	BPT, BART (A-215-77-2-A)	24-hr block
NO <sub>x</sub>	0.40 <sup>2</sup>	06-096 CMR 138, NO <sub>x</sub> RACT BART (A-215-77-2-A)	24-hr block

<u>Pollutant</u>	<u>lb/hr</u>	<u>Origin and Authority</u>	<u>Averaging Time</u>
PM	84.4	06-096 CMR 140, BPT	-
PM <sub>10</sub>	84.4	06-096 CMR 140, BPT, <b>Enforceable by State Only</b>	-
SO <sub>2</sub>	186	06-096 CMR 140, BPT, <b>Enforceable by State Only</b>	3-hr block
NO <sub>x</sub>	186 <sup>3</sup>	06-096 CMR 140, BPT	24-hr block
CO	1192.4	BPT, #A-215-71-B-A/R, <b>Enforceable by State Only</b>	-
VOC	31.3	06-096 CMR 140, BPT, <b>Enforceable by State Only</b>	-

1. Effective date is 1/1/13. Until then, the limit remains 0.79 lb/MMBtu.
  2. See Condition (14)(J) regarding compliance and for an alternative to this limit by combining NO<sub>x</sub> emissions with the #3 Recovery Boiler.
  3. See Condition (16) for an alternative to this limit by combining NO<sub>x</sub> emissions with Recovery Boiler #3.
- B. WPLLC shall have no sulfur restrictions on fuel oil for the #9 Power Boiler, provided that emissions do not exceed the licensed limit for lb SO<sub>2</sub>/MMBtu on a 24 hr block average. [06-096 CMR 140, BPT, BART (A-215-77-4-A)]
- C. Visible emissions from the #9 Power Boiler shall not exceed 30% opacity on a six-minute block average basis, except for no more than two (2) six (6) minute block averages in a three hour period. [06-096 CMR 101]
- D. Four hours of cold start-up or planned shut-down are exempt from opacity standards provided the Department determines that the boiler was operated in a manner consistent with good air pollution control practices to minimize emissions during the cold start-up or planned shut-down. [06-096 CMR 101]

- E. WPLLC shall keep records of all maintenance and inspections performed on the grates, oil guns, and combustion control systems for the #9 Power Boiler. Copies of these records shall be submitted to the Department upon request. [06-096 CMR 140, BPT] **Enforceable by State-only**
- F. An annual, detailed review of scrubber operation shall be conducted by an original equipment manufacturer (OEM) representative or otherwise qualified personnel. Any recommendations that arise shall be reviewed and acted upon as practicable. [06-096 CMR 140, BPT] **Enforceable by State-only**
- G. Records of scrubber review and all repairs shall be maintained, available upon request, and included in WPLLC's quarterly reports for the quarter when the annual review is conducted. [06-096 CMR 140, BPT] **Enforceable by State-only**
- H. WPLLC shall operate, calibrate, and maintain O<sub>2</sub>, NO<sub>x</sub>, and SO<sub>2</sub> CEMS and a stack flow monitor in accordance with 40 CFR, Part 60, Appendix B and the data recovery requirements of 06-096 CMR 117.
- I. The NO<sub>x</sub> and SO<sub>2</sub> CEMS shall record data on a lb/hr basis. WPLLC shall record total NO<sub>x</sub> emissions in lb/day from the #9 Power Boiler on a daily basis and total NO<sub>x</sub> emissions from the #9 Power Boiler as a 12-month rolling total on a monthly basis. These emission rates shall be used to calculate the total NO<sub>x</sub> emissions for Condition (17). [#A-215-71-B-A/R]
- J. WPLLC may demonstrate compliance with NO<sub>x</sub> emission limits using an emissions averaging basis, with CEM data. The emissions averaging shall be calculated between the #9 Power Boiler and #3 Recovery Boiler on an equivalent lb/MMBtu or ppmv on a 24-hour daily block arithmetic basis. The emission averaging basis shall be calculated as follows:
1. Calculate the over-controlled NO<sub>x</sub> level from #3 Recovery Boiler by subtracting the #3 Recovery Boiler actual NO<sub>x</sub> ppmdv corrected for O<sub>2</sub> from 06-096 CMR 138 limit (164 ppm, dry basis corrected for O<sub>2</sub>);
  2. Convert over-controlled NO<sub>x</sub> level from #3 Recovery Boiler from ppmv to lbs/hr;
  3. Convert over-controlled NO<sub>x</sub> level from #3 Recovery Boiler from lbs/hr to lbs/MMBtu;
  4. Subtract over-controlled NO<sub>x</sub> level from #3 Recovery Boiler (in lbs/MMBtu) from actual 24-hour average (lb/MMBtu) on #9 Power Boiler and compare this value with NO<sub>x</sub> RACT lb/MMBtu limit (0.4 lbs/MMBtu) to determine compliance.

This method can also be used if surplus NO<sub>x</sub> from #9 Power Boiler needs to be averaged with NO<sub>x</sub> emissions from #3 Recovery Boiler.

If a CEM is used to demonstrate compliance with NO<sub>x</sub> emission limits, then periods of startup, shutdown, malfunction, and fuel switching are not included in the 24-hour average emission rates, provided that records are maintained to show facility was operated to minimize emissions. [06-096 CMR 138 (3)(O); #A-215-71-S-A]

- K. Periodic monitoring for the #9 Power Boiler shall consist of the following:  
 [06-096 CMR 140, BPT]

<u>Periodic monitoring</u>	<u>Record</u>	<u>Average</u>
Scrubber pressure drop	every 15 min.	3-hr avg every 3 hours
Scrubber media recycle flow rate	every 15 min.	3-hr avg every 3 hours

- L. During periods of firing natural gas only, the wet scrubber on #9 Power Boiler is not required to be in operation. [06-096 CMR 140, BPT]

M. Compliance Assurance Monitoring (CAM)

1. WPLLC operates a wet scrubber on #9 Power Boiler to meet the requirements of CAM for PM. [40 CFR Part 64]

**PM CAM:**

	<b>Indicator</b>
<b>Indicators</b>	Scrubber Pressure Drop Scrubber Media Recycle Flow Rate
<b>General Criteria</b>	
Measurement Method	Magnetic flow meters, Pressure drop indicators
Indicator Ranges	Scrubber Pressure Drop - TBD Scrubber Media Recycle Flow Rate – TBD  Indicator ranges shall be determined within 180 days of the issuance of this Part 70 License. Indicator ranges shall be established based on manufacturer’s recommendations, operational control experience, and stack testing results.  Excursions shall consist of any 3-hour block average outside the established indicator ranges. WPLLC shall take immediate corrective action in response to an excursion.

<b>Performance Criteria</b>	
Data Representativeness and QA/QC	Flow Meters and Pressure Drop Indicators shall be calibrated, maintained, and operated according to manufacturer's specifications.
Monitoring Frequency	Record indicator data every 15 minutes. Average indicator data every 3 hours.
Data Collection Procedure	Data shall be recorded and stored electronically.

2. Any excursion shall be reported on semiannual reports. If excursions occur, WPLLC must also certify intermittent compliance with the established indicator ranges for the control device in their annual compliance certification. Excursions from the PM CAM indicator ranges shall only be considered violations if the emission limits specified in this license are exceeded. [40 CFR 64]
3. WPLLC shall restore normal operation of the control equipment as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. [40 CFR 64.7.d]
4. WPLLC shall operate and monitor the control equipment within the ranges established by the CAM plan outlined in section 1 above. Prior to making any changes to the approved CAM plan, WPLLC shall notify the Department and, if necessary, submit a proposed modification to this License to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [40 CFR 64 (7)(e)]

**This condition replaces Special Condition (15)A in Air Emission License A-215-70-I-R/A.** The rest of Special Condition (15) in Air Emission License A-215-70-I-R/A shall remain in effect and unaltered by this license amendment:

(15) #3 Recovery Boiler

A. Emissions shall not exceed the following:

<b>Pollutant</b>	<b>gr/dscf corrected to 8% O<sub>2</sub></b>	<b>ppmv dry basis corrected to 8% O<sub>2</sub></b>	<b>Emission Rate, lb/hr</b>	<b>Origin and Authority</b>
PM	0.021	-	40.68	A-215-71-B-A/R, BPT
PM <sub>10</sub>	-	-	40.68	A-215-71-B-A/R, BPT
SO <sub>2</sub>	-	150 (30-day rolling avg)	373.04 (3-hour block average) <sup>1</sup>	A-215-71-B-A/R, BPT
NO <sub>x</sub>	-	80 (30-day rolling avg) <sup>2</sup> 164 (24-hr block avg) <sup>2</sup>	143.3 (24-hour block average) <sup>3</sup>	A-215-71-B-A/R, BPT
CO	-	215 (30-day rolling avg)	235 (24-hr block average) <sup>3</sup>	A-215-71-B-A/R, BPT
VOC	-	-	40.2 (based on appropriate EPA stack testing method)	06-096 CMR 140, BPT <b>(Enforceable by State only)</b>
TRS	-	5 (12-hr block average) <sup>4</sup>	-	A-215-71-B-A/R, BPT

1. See Condition 15(F)(1) for an alternative to this limit.
2. See Condition 14(J) regarding compliance and for alternatives to these limits by averaging emissions with the #9 Power Boiler.
3. See Condition 16 for alternatives to these limits by averaging emissions with the #9 Power Boiler.
4. The first 2 (two) 12 (twelve)-hour block averages in a calendar quarter which exceed 5 ppm are not considered violations of 06-096 CMR 124 or this License.

**This condition replaces Special Condition (16)B in Air Emission License A-215-70-I-R/A.** The rest of Special Condition (16) in Air Emission License A-215-70-I-R/A shall remain in effect and unaltered by this license amendment:

(16) Combined lb/hr Emissions From #3 Recovery Boiler and #9 Power Boiler  
 [A-215-71-AC-A, A-215-71-AH-M]

B. When NO<sub>x</sub> emissions from #9 Power Boiler are greater than 186 lb/hr on a 24-hour average basis, the combined NO<sub>x</sub> emissions from both units shall not

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exceed the total of 329.3 lb/hr on a 24-hour average basis. This alternative limit may not be used more than 5 times per year (12-month rolling total). During such periods, WPLLC shall keep records detailing the use of these limits, including a 12-month rolling total. WPLLC shall still meet the BACT limits of 164 ppmv on a dry basis corrected to 8% O<sub>2</sub> on a 24-hour block average basis and 80 ppmv corrected to 8% O<sub>2</sub> on a 30-day rolling average, for the #3 Recovery Boiler, except that it may utilize the Emissions Averaging allowed in Condition 14(J) to meet such ppmv limits.

DONE AND DATED IN AUGUSTA, MAINE THIS 23<sup>rd</sup> DAY OF April, 2012.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie L. Fox  
PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-215-70-I-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 2/23/2012

Date of application acceptance: 3/5/2012

Date filed with the Board of Environmental Protection:

This Order prepared by Jane Gilbert, Bureau of Air Quality.

