

**S.D. Warren Company  
Cumberland County  
Westbrook, Maine  
A-29-70-E-A**

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

After review of the Part 70 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, Section 344 and Section 590, the Department finds the following facts:

**I. Registration**

A. Introduction

FACILITY	S.D. Warren Company
INITIAL LICENSE NUMBER	A-029-70-A-I
LICENSE TYPE	Part 70 License Amendment #4
NAICS CODES	322121
NATURE OF BUSINESS	Paper Mill
FACILITY LOCATION	Westbrook, Maine
INITIAL LICENSE ISSUANCE DATE	December 31, 2003
AMENDMENT ISSUANCE DATE	
LICENSE EXPIRATION DATE	December 31, 2008

B. Affected Emission Equipment

The following emission units are addressed by this Part 70 License Amendment:

<b>EMISSION UNIT ID</b>	<b>UNIT CAPACITY</b>	<b>UNIT TYPE</b>
#20 Coater	NA	Paper Coater

#20 Coater

S.D. Warren Company (SDW) operates the #20 Coater for coating paper produced at the Westbrook Mill. The #20 Coater was manufactured by Black Clawson and was most recently rebuilt in 1984. The #20 Coater has an approximate production rate of 70 tons per day. The #20 Coater utilizes a catalytic incinerator to control VOC emissions when running grades of coating with greater than 2.9 pounds of VOC per gallon (lb/gal) of coating.

The #20 Coater is subject to Chapter 123, the Department's regulation on paper coating. Chapter 123 Section 3(A) requires that when operating uncontrolled the coater shall not emit VOC in excess of 2.9 pounds per gallon

of coating. Chapter 123 Section 3(B) requires that if the coater is to apply coatings containing greater than 2.9 pounds of VOC per gallon of coating, the coater must be operated in conjunction with an add-on air pollution control device that will reduce VOC emissions by 95% or to a rate equal to 4.8 pounds of VOC per gallon of solids applied.

Amendment #21 to Air Emission License A-29-71-C-A/R established a State-Only Enforceable annual VOC emissions cap for the #20 Coater operations of 100 tons of VOC per year as a Best Practical Treatment (BPT) requirement and not as a result of new source review. Compliance with the annual VOC emissions cap is demonstrated through coatings use records and destruction efficiencies based on stack test results. In addition to the Chapter 123 record keeping requirements on coatings use, SDW maintains records of VOC emissions from coatings use on a twelve-month rolling total basis.

**C. Nature of Requested License Changes**

1. SDW has requested a change in the annual VOC emission limit contained in Condition (24)G of the Initial Part 70 License A-29-70-A-I. SDW proposes to change the limit associated with its #20 Coater from 100 tons per year to 139.7 tons per year to permit intra-facility emission trading of annual VOC emissions from its #2 and #20 Coaters. This change is requested in order to provide increased operational flexibility on the #20 Coater, however, the annual VOC emission limit of 39.7 tons per year applicable to the #2 Coater and contained in Condition (26)D of the Initial Part 70 License will remain in place.
2. The second change is to correct a typographical error contained in Condition (26)D of the Initial Part 70 License A-29-70-A-I. This condition references the #20 Coater where it should reference the #2 Coater.

**D. Application Classification**

The application for SDW does not include the licensing of increased total facility emissions or the installation of new or modified equipment. This Part 70 License Amendment includes an administrative revision to a State-Only Enforceable condition to correct a typographical error and a change to an annual VOC emission limitation contained in a State-Only Enforceable condition. Therefore, this license amendment is considered to be a Part 70 Significant License Modification and will be issued under Chapter 140 of the Department's regulations for a Part 70 source.

## II. REVISIONS

- A. Condition (24)G of the Initial Part 70 License A-29-70-A-I will be revised to change the State-Only Enforceable annual VOC emission limit for #20 Coater (currently at 100 tons per year) to a combined #2 & #20 Coater annual VOC emission limit (139.7 tons per year). This will allow increased operational flexibility for the #20 Coater with no increase in total facility annual license allowed VOC emissions. The combined VOC emission limit will not affect the annual VOC emission limit for the #2 Coater which will remain at 39.7 tons per year.
- B. Condition (26)D of the Initial Part 70 License A-29-70-A-I will be revised to correct the typographical error that references the #20 Coater instead of the #2 Coater, as it should.

## ORDER

The Department hereby grants this Part 70 License A-29-70-E-A (Amendment #4) pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP Chapter 115 and subject to the unaffected conditions found in the Initial Part 70 License A-29-70-A-I, in all subsequent amendments: A-29-70-B-A & A-29-70-C-A, in addition to the special conditions below.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 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 condition shall be in effect upon issuance of this license and shall replace Condition (24)G of the Initial Part 70 License A-29-70-A-I:**

(24) #20 Coater

G. S.D. Warren Company shall not exceed a total annual emissions limit of 139.7 tons per year of VOCs generated from the coating processes of #2 Coater and #20 Coater combined, based on a twelve-month rolling total. [MEDEP Chapter 140, BPT]  
**[Enforceable by State-only]**

**The following condition shall be in effect upon issuance of this license and shall replace Condition (26)D of the Initial Part 70 License A-29-70-A-I:**

(26) #2 Coater

D. S.D. Warren Company shall not exceed a total annual emissions limit of 39.7 tons per year of VOCs generated from the coating process of #2 Coater based on a twelve-month rolling total. [MEDEP Chapter 140, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS                      DAY OF                      2006.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
DAVID P. LITTELL, COMMISSIONER

**The term of this amendment shall be concurrent with the term of the Initial Part 70 License A-29-70-A-I.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: May 22, 2006

Date of application acceptance: June 7, 2006

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

This Order prepared by Eric Kennedy, Bureau of Air Quality.