

<b>S.D. Warren Company</b>	)	<b>Department Findings</b>
<b>Cumberland County</b>	)	<b>Findings of Fact and Order</b>
<b>Westbrook, Maine</b>	)	<b>Part 70 Air Emission License</b>
<b>A-29-70-H-A</b>	)	<b>Amendment #7</b>

After review of the Part 70 Administrative Revision application, staff investigation reports and other documents in the applicant’s file in the Bureau of Air Quality, pursuant to 06-096 CMR 140 and 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
PART 70 LICENSE NUMBER	A-29-70-A-I
LICENSE TYPE	Chapter 140 Administrative Revision
NAICS CODES	322121
NATURE OF BUSINESS	Papermill
FACILITY LOCATION	Westbrook, Maine
PART 70 LICENSE ISSUANCE DATE	December 31, 2003
AMENDMENT ISSUANCE DATE	
PART 70 LICENSE EXPIRATION DATE	December 31, 2008

B. Nature of Revision Request

S.D. Warren Company (S.D. Warren) operates a catalytic incinerator as add-on VOC control when applying coatings on their #20 Coater which contain in excess of 2.9 lbs of VOC per gallon of coating applied. The operation of this equipment is addressed in S.D. Warren’s current Part 70 Air Emission License (A-29-70-A-I). S.D. Warren requests a revision to condition (25)(G) of its Part 70 Air Emission License to replace the requirement to maintain the catalytic incinerator inlet temperature at no less than 775° F with a requirement that sets the minimum catalytic incinerator inlet temperature based on the average temperature corresponding to the most recent compliance test demonstrating compliance with the VOC capture and control efficiency or VOC emission rate requirements for the catalytic incinerator.

<b>S.D. Warren Company</b>	)	<b>Department</b>
<b>Cumberland County</b>	)	<b>Findings of Fact and Order</b>
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<b>A-29-70-H-A</b>	<b>2</b>	<b>Amendment #7</b>

C. Application Classification

06-096 CMR 140 states that Part 70 Administrative Revision procedures may be used for a revision at a facility to correct errors, to require additional recordkeeping and to incorporate other similar changes. This revision request is considered to be a Part 70 Administrative Revision by the Department and will be processed as such under 06-096 CMR 140.

D. Justification for Revision Request

S.D. Warren has demonstrated through biennial compliance testing that the VOC capture and control efficiency or emission rate requirements associated with the #20 Coater can be achieved while operating the catalytic incinerator inlet temperature at lower levels than the minimum temperature of 775° F currently contained in condition (25)(G) of the Part 70 License. S.D. Warren also contends that by operating the catalytic incinerator at inlet temperatures lower than 775° F, the amount of natural gas that must be burned and the emissions associated with the burning of natural gas will be reduced while maintaining VOC capture and control efficiency or VOC emission rate requirements for the #20 Coater Catalytic Incinerator. The Department concurs with S.D. Warren's determinations and considers this revision request a Part 70 Administrative Revision under 06-096 CMR 140.

**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

S.D. Warren Company ) Department  
Cumberland County ) Findings of Fact and Order  
Westbrook, Maine ) Part 70 Air Emission License  
A-29-70-H-A 3 Amendment #7

The Department hereby grants Part 70 Air Emission License Amendment #7 (A-29-70-H-A), subject to the conditions found in Part 70 Air Emission License A-29-70-A-I and subsequent Amendments (#1 through #6) and the following modified condition:

**The following shall replace Condition (25)(G) of Air Emission License A-29-70-A-I:**

**(25) Catalytic Incinerator**

G. S.D. Warren Company shall maintain the #20 Coater Catalytic Incinerator inlet temperature at or above the average inlet temperature measured during the most recent compliance test which demonstrated compliance with the VOC capture and control efficiency or VOC emission rate requirements listed in condition (25)(B) above. [MEDEP Chapter 140, BPT]  
[**Enforceable by State-only**]

DONE AND DATED IN AUGUSTA, MAINE THIS                      DAY OF                      2007.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

**This license shall expire concurrently with license A-29-70-A-I.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: April 5, 2007

Date of application acceptance: April 26, 2007

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

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