

**Wausau Paper Jay Maine Mill**  
**Franklin County**  
**Jay, Maine**  
**A-149-70-C-R/A**

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

After review of the Part 70 License 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	Wausau Paper Jay Maine Mill (Wausau Paper)
INITIAL LICENSE NUMBER	A-149-70-B-R
LICENSE TYPE	Part 70 License
NAICS CODES	322121
NATURE OF BUSINESS	Paper Mill
FACILITY LOCATION	1 Mill Street, Jay
INITIAL LICENSE ISSUANCE DATE	August 14, 2000
RENEWAL ISSUANCE DATE	November 2, 2005
LICENSE EXPIRATION DATE	November 2, 2010

B. Emission Equipment

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

<b>EMISSION UNIT ID</b>	<b>UNIT CAPACITY</b>	<b>UNIT, FUEL TYPE</b>
Power Boiler #1 (1B)	147 MMBtu/hr	Fuel Burning, #6 Fuel Oil, & On-Specification Waste Oil
Power Boiler #2 (2B)	73 MMBtu/hr	Fuel Burning, #6 Fuel Oil, & On-Specification Waste Oil
Power Boiler #3 (3B)	73 MMBtu/hr	Fuel Burning, #6 Fuel Oil, & On-Specification Waste Oil
Power Boiler #4 (4B)	73 MMBtu/hr	Fuel Burning, #6 Fuel Oil, & On-Specification Waste Oil

#9 Paper Machine (9PM)	240 tons specialty paper/day*	Process Equipment
#11 Paper Machine (11PM)	120 tons specialty paper/day*	Process Equipment
Coating Prep Area (1CP)		Process Equipment, Coating Chemical Usage
Solids Mixing Tanks (6) 1SMT – 6 SMT	Various	Process Equipment
Solvent Degreasers (7) 1DG – 7 DG	Tanks from 10 to 30 gallons	Miscellaneous Equipment

\*Note: Unit capacities for process equipment are listed for informational purposes only and are not intended as license restrictions.

Wausau Paper no longer uses its off machine coater (OMC) which was included in the Initial Part 70 License. The OMC is disassembled, currently not operational and the company does not intend to use or license the OMC at this time. Therefore the OMC has been removed from the Renewal Part 70 License.

Wausau Paper has additional insignificant activities which do not need to be listed in the emission equipment table above. These include their Emergency Fire Pump and the Backup Wastewater Diesel Pump. Although these units are not included in the Part 70 License, they may still be subject to the requirements of MEDEP Chapters 101 and 103. The complete list of insignificant activities can be found in the Part 70 license application and in Appendix B of Chapter 140 of the Department's Regulations.

Wausau Paper has also requested to amend their license to allow upgrades to Paper Machine #11 to increase production 30-40%. The changes to the paper machine include upgrades to the steam box, dryer siphons, and vacuum pumps, and the addition of new felt rolls. The proposed changes represent less than 50% of the cost of a new paper machine. Due to an increased steam demand from the paper machine, the boiler emissions will be affected from the #11 upgrade. Wausau Paper has calculated the increase in emissions resulting from increased fuel consumption in the boilers and the higher production from #11 paper machine as compared to 2001 and 2002 levels which represent normal operations. These increased emissions were then examined to determine if PSD significant emission thresholds will be exceeded. The tables below display this examination:

**Emissions change from increase tape production on #11**

Pollutant	Boiler Emission Increase TPY	Paper Machine Emission Increase TPY	Total Emission Increase TPY	PSD Significant Emission Threshold TPY
PM <sub>2.5</sub>	0.36	0.13	0.50	15
SO <sub>2</sub>	9.80	-	9.80	40
NO <sub>x</sub>	1.80	-	1.80	40
CO	0.19	-	0.19	100
VOC	0.03	3.06	3.09	40

**Emissions change from increase tablet production on #11**

Pollutant	Boiler Emission Increase TPY	Paper Machine Emission Increase TPY	Total Emission Increase TPY	PSD Significant Emission Threshold TPY
PM <sub>2.5</sub>	0.06	0.36	0.40	15
SO <sub>2</sub>	1.50	-	1.50	40
NO <sub>x</sub>	0.30	-	0.30	40
CO	0.03	-	0.03	100
VOC	0.005	(-0.17)	(-0.16)	40

C. Application Classification

The application for Wausau Paper includes the licensing of increased emissions below the PSD Significant Emission threshold, and the installation of new or modified equipment. Therefore the license is considered to be a minor modification and renewal of a Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

**II. FACILITY AND EMISSION UNIT DESCRIPTION**

A. Process Description

Wausau Paper typically produces 200 tons/day of specialty papers at their paper mill in Jay, Maine. Kraft hardwood and softwood dried pulp is received and re-pulped in 3 pulpers where it is mixed with water and agitated to release the dried wood fibers to a 3% consistency solution. The pulp is then refined: mechanical energy is used to abrade the surface of the fibers which increases surface area and improves the binding qualities of the pulp. Hardwood and softwood pulps are mixed together to form a paper with the qualities required by the customer. Dyes may be added at this stage, and soda ash to control pH as necessary.

Wausau operates two paper machines which draw the pulp into sheets, press out water, dry the paper, apply coatings as required, and calendar the paper to control its smoothness. The paper may be further calendered on Wausau's super-calendar. It is then wound, trimmed to width, wrapped and shipped.

B. Compliance Assurance Monitoring (CAM)

40 CFR Part 64 requires that a major source required to obtain a part 70 Air License submit a Compliance Assurance Monitoring plan for each unit at the source subject to an emission limit that uses a control device to achieve compliance with the emission limit and that has potential to emit the pollutant prior to control at or above major source levels. There are no units at Wausau Paper that are applicable to CAM; therefore the facility is not subject to the requirements of 40 CFR Part 64.

C. Power Boilers #1 - #4 (1B – 4B)

Wausau Paper operates four power boilers. The boilers' specifications are summarized in the following table, and described in detail below:

Equipment	Construction Date	Maximum Capacity (MMBtu/hr)	Max. Firing Rate (gal/hr)	Fuel Type, % Sulfur	Stack #
Boiler #1 (1B)	1948	147	980	#6 & On-Specification Waste Oil, 2.0%	1
Boiler #2 (2B)	1926	73	487	#6 & On-Specification Waste Oil, 2.0%	1
Boiler #3 (3B)	1926	73	487	#6 & On-Specification Waste Oil, 2.0%	1
Boiler #4 (4B)	1926	73	487	#6 & On-Specification Waste Oil, 2.0%	1

Boiler #1 was manufactured by Combustion Engineering to fire oil and coal with a maximum heat input of 147 MMBtu/hr. The boiler was installed in 1948, prior to the New Source Performance Standards (NSPS) Subpart Db applicability date. Boiler #1 operates to provide process steam, electrical generation, and plant heat.

Boilers #2, #3 and #4 are identical units manufactured by Ladd to fire oil and coal with a maximum heat input of 73 MMBtu/hr per boiler. All three units were installed in 1926, prior to the NSPS Subpart Dc applicability date. Boilers #2, #3 and #4 operate to provide process steam, electrical generation and plant heat.

Boilers #1, #2, #3 and #4 previously fired coal, but are no longer capable of doing so. The boilers fire #6 fuel oil with a sulfur content not to exceed 2.0% and On-Specification Waste Oil. The boilers were retrofitted with low NOx burners in 1995 to meet the requirements of NOx RACT. Emissions from all four boilers exit through a common 197-foot stack. The breaching to the common stack has a continuous opacity monitor (COM). A reducing nozzle has been installed on the stack to decrease the diameter from 12 feet to 6 feet 10 inches which increases the exit gas velocity and minimizes any negative plume rise attributable to stack tip downwash.

Wausau Paper does not exceed the potential to emit 10 tons/year of any single HAP or 25 tons/year combined HAPs, thus Boilers #1, #2, #3 and #4 are not located at a major source of Hazardous Air Pollutants (HAPs) and are therefore not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD).

Streamlining

1. Opacity

Wausau Paper currently measures opacity from the combined stack of Boilers #1, #2, #3 and #4 with a COM located in Stack #1.

- a. MEDEP Chapter 101, Section 2(B)(1)(a)(i) contains the only applicable opacity standard for the operation of a single boiler exhausting through Stack #1 of 30% on a 6-minute block average basis, except for no more than two 6-minute block averages in a 3-hour block period. **No streamlining requested.**
- b. MEDEP Chapter 101, Section 2(B)(5)(ii) contains an applicable opacity standard for the combined emissions from Boilers #1, #2, #3 and #4 of 30% on a 6-minute block average basis for 98% of all 6-minute block averages on a quarterly basis. In addition, the combined stack opacity shall not exceed 40% opacity on a 6-minute block average basis for 99.5% of all 6-minute block averages on a quarterly basis.
- c. A previous BPT analysis, determined in License A-149-72-B-R, issued October 12, 1993, and modified in License A-149-70-A-I, issued August 14, 2000, established an applicable opacity standard for the combined emissions of Boilers #1, #2, #3 and #4 of 30% on a 6-minute block average basis except for no more than two 6-minute block averages in a 3-hour period, except that the combined stack opacity may exceed 30% no more than 12 times per calendar year. During these times, stack opacity shall not exceed 40% for more than 18 minutes, recorded as 6-minute averages, in a 3-hour period.

Wausau accepts streamlining for the opacity standard for the combined emissions from Boilers #1, #2, #3 and #4. The BPT limit (c) is the most stringent and is therefore the only combined-stack opacity limit included in this license.

2. PM

- a. MEDEP Chapter 103, Section 2(A)(1) contains an applicable PM lb/MMBtu emission standard of 0.20 lb/MMBtu for each boiler.
- b. A previous BPT analysis established an applicable PM lb/MMBtu emission limit of 0.15 lb/MMBtu for each boiler.

Wausau accepts streamlining for the PM lb/MMBtu standard. The BPT limit is the most stringent and is therefore the only PM lb/MMBtu limit included in this license.

- c. A previous BPT analysis established an applicable PM lb/hr emission limit of 30.0 lb/hr from the combination of Boilers #1, #2, #3 and #4. **No streamlining requested.**
3. PM<sub>10</sub>
    - a. A previous BPT analysis established the only applicable PM<sub>10</sub> lb/MMBtu emission standard of 0.14 lb/MMBtu for each boiler. **No streamlining requested.**
    - b. A previous BPT analysis established the only applicable PM<sub>10</sub> lb/hr emission limit of 28.0 lb/hr from the combination of Boilers #1, #2 #3 and #4. **No streamlining requested.**
  4. SO<sub>2</sub>
    - a. MEDEP Chapter 106, Section 2(A)(2) contains the only applicable fossil fuel sulfur content standard of 2.0% by weight. **No streamlining requested.**
    - b. BPT establishes the only applicable SO<sub>2</sub> lb/hr emission limit of 418.0 lb/hr from the combination of Boilers #1, #2, #3 and #4. **No streamlining requested.**
  5. NO<sub>x</sub>
    - a. Each of Boilers #1, #2, #3 and #4 are equipped with retrofit low NO<sub>x</sub> burner systems for control of NO<sub>x</sub> emissions. The low NO<sub>x</sub> burners meet the requirements in MEDEP Chapter 138 Section 3(B)(1) to operate a low NO<sub>x</sub> burner or equivalent strategy. Therefore, the lb/MMBtu standard in MEDEP Chapter 138 does not apply to Boilers #1, #2, #3 and #4.
    - b. BPT establishes the only applicable NO<sub>x</sub> lb/MMBtu emission limit of 0.35 lb/MMBtu for Boiler #1. **No streamlining requested.**
    - c. BPT establishes the only applicable NO<sub>x</sub> lb/MMBtu emission limit of 0.40 lb/MMBtu for each of Boilers #2, #3 and #4 when the boiler is running at or greater than 50% of its maximum load. **No streamlining requested.**
    - d. BPT establishes the only applicable NO<sub>x</sub> lb/hr emission limit of 29.2 lb/hr for each of Boilers #2, #3 and #4 when the boiler is running at less than 50% of its maximum load. **No streamlining requested.**
    - e. BPT establishes the only applicable NO<sub>x</sub> lb/hr emission limit of 90.0 lb/hr from the combination of Boilers #1, #2, #3 and #4. **No streamlining requested.**

6. CO  
BPT establishes the only applicable CO lb/hr emission limit of 6.0 lb/hr from the combination of Boilers #1, #2, #3 and #4. **No streamlining requested.**
7. Volatile Organic Compounds (VOC)  
BPT establishes the only applicable VOC lb/hr emission limit of 2.0 lb/hr from the combination of Boilers #1, #2, #3 and #4. **No streamlining requested.**

Periodic Monitoring

Periodic monitoring shall consist of record keeping which includes fuel use records, fuel analysis records, and periodic compliance testing on each boiler exhaust for particulate matter and NO<sub>x</sub>. Periodic monitoring also includes the instrument monitoring and record keeping requirements in Chapter 117.

Wausau Paper shall stack test Boilers #1, #2, #3 and #4 for PM and NO<sub>x</sub> every odd calendar year. The stack testing shall be conducted in accordance with 40 CFR, Part 60, Appendix A.

Based on best management practices and the type of fuel for which the Power Boilers were designed, it is unlikely that Boilers #1, #2, #3 or #4 will exceed the emission limits for CO and VOC. Therefore, periodic monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting Wausau Paper to perform testing and may take enforcement action for any violations discovered.

Parameter Monitors

Wausau Paper shall monitor and record the following as specified, for the combination of Boilers #1, #2, #3 and #4:

Item to be monitored	Record
Fuel oil firing rate	Continuously

CEMS and COMS

MEDEP Chapter 117 contains an applicable requirement to monitor opacity.

Based on the above, Wausau Paper shall operate a COMS on the combined stack emissions which provides opacity data demonstrated on a six minute block average basis. There are no CEMS operated on Boilers #1, #2, #3 and #4.

Control Equipment

Control Equipment for Boilers #1, #2, #3 and #4 consists of low-NO<sub>x</sub> burners.

D. Paper Machines (9PM, 11PM) and Coating Prep Area (1CP)

Wausau Paper has proposed to modify #11 paper machine in order to increase production. Modifications include upgrades to the steam box, dryer siphons, and vacuum pumps and adding new felt rolls. Due to the upgrades proposed, #11 Paper Machine is subject to BACT. A BACT evaluation was conducted on various technologies and it was determined that any add-on control equipment was either practically or economically unfeasible. Therefore, BACT on #11 paper machine shall consist of good operating practices to minimize PM and VOC emissions, and the continual reevaluation of new coating additives to reduce VOC content.

Paper Machines #9 and #11 are subject to the paper coating requirements of MEDEP Chapter 123. Some (less than half) of the coating formulations that Wausau Paper applies to its paper products include VOCs. Typically these VOC-containing coatings are low VOC coatings that have an as-applied VOC content of less than 0.5 pounds per gallon of coating (less water and exempt compounds). These emissions are generally vented to the outside ambient air via stacks that service the paper machines. The paper machine exhaust thus contains very low VOC concentrations. The Department finds the use of low-VOC-content coatings (not to exceed 2.9 pounds of VOC per gallon less water and exempt compounds) to represent BPT and BACT for the paper machines and coating prep area at Wausau Paper. Because Wausau Paper is not a major source of HAPs as defined in 40 CFR, Part 63.2, Paper Machines #9 and #11 are not subject to the requirements of 40 CFR, Part 63, Subpart JJJJ for Paper and Other Web Coating.

For some paper grades Wausau Paper must use a 30 percent aqueous ammonia solution in coating formations. Wausau Paper has and continues to look for alternatives to ammonia in its formulations and has continued to reduce ammonia emissions. The Department finds that continued product substitution and new substitutions as developed represents BPT for ammonia process emissions.

Streamlining

#9 and #11 Paper Machines

**No streamlining requested.**

Periodic Monitoring

Periodic Monitoring shall consist of records demonstrating the VOC-content of coatings used in the paper machines and the amount of each coating used on a monthly and 12-month rolling total basis.

Parameter Monitors

There are no Parameter Monitors required for the #9 and #11 Paper Machines.

CEMS and COMS

There are no CEMS or COMS required to be operated for the #9 and #11 Paper Machines.

Control Equipment

There is no control equipment operated for the #9 and #11 Paper Machines.

E. Solids Mixing Tanks (1SMT – 6SMT)

Wausau Paper operates the following solids mixing tanks:

Equipment	Control
#1 Starch Mixing Tank	Baghouse #1
#2 Starch Mixing Tank	Baghouse #2
#1 Blender	Baghouse #3
Abbe Mixer	Baghouse #3
Kady Mill	Baghouse #4
Reid Mixer	Baghouse #4

Emissions from the mixing tanks are controlled by four baghouses. Daily inspections are conducted to assure that these filters operate effectively. The Department finds the use of baghouses to control emissions from the solids mixing tanks to represent BPT.

Streamlining

Opacity

MEDEP Chapter 101, Section 2(B)(3)(c) contains the only applicable opacity standard for each baghouse of 10% on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period. Corrective action is required to be taken if opacity from any baghouse exceeds 5%. **No streamlining requested.**

Periodic Monitoring

Periodic Monitoring shall consist of maintenance records recording the date and location of all bag failures as well as all routine maintenance on the baghouses.

Parameter Monitors

There are no Parameter Monitors required for the Solids Mixing Tanks.

CEMS and COMS

There are no CEMS or COMS required to be operated for the Solids Mixing Tanks.

Control Equipment

Control equipment for the Solids Mixing Tanks consists of four baghouses.

F. Solvent Degreasers (1DG – 7DG)

Wausau Paper operates seven solvent degreasers from which small quantities of VOCs are emitted. Although the parts washers may be considered insignificant based on the amount of VOC emitted, the washers are subject to the operational standards found in MEDEP Chapter 130.

Periodic monitoring

Periodic monitoring for the degreaser units shall consist of recordkeeping including records of solvent added and removed.

G. Facility Emissions

The following facility emissions were calculated based on the firing of 11,680,000 gallons of #6 fuel oil, with a maximum sulfur content not to exceed 2.0% by weight and 10,000 gal of spec. waste oil with a sulfur content not to exceed 2.0% by weight..

**Total Licensed Annual Emissions for the Facility  
Tons/year**

(used to calculate the annual license fee)

	<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>
Boilers #1, #2, #3 and #4	131.76	123.00	1850.60	352.20	72.19	24.03
Process Sources	0.13	0.13	--	--	--	23.06
<b>Total TPY</b>	<b>131.89</b>	<b>123.13</b>	<b>1850.60</b>	<b>352.20</b>	<b>72.19</b>	<b>47.09</b>

**III. AIR QUALITY ANALYSIS**

Wausau Paper 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 Renewal Part 70 License.

**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 the Part 70 License A-149-70-C-R/A pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Wausau Paper pursuant to the Department's preconstruction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

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.

#### STANDARD STATEMENTS

- (1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both; [MEDEP Chapter 140]
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [MEDEP Chapter 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [MEDEP Chapter 140]
- (4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license; [MEDEP Chapter 140]
- (5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for

the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [MEDEP Chapter 140]

- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
  - A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
  - B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated October 25, 1996.

SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
Facility	Chapter 107	Sulfur Dioxide Emission Standards for Sulfite Pulp Mills	Facility is not a Sulfite Pulp Mill.
Facility	Chapter 111	Petroleum Liquid Vapor Storage Control	No applicable sources at this facility.
Facility	Chapter 124	Total Reduced Sulfur Control from Kraft Pulp Mills	Facility is not Kraft Mill.
Facility	Chapter 132	Graphic Arts-Rotogravure and Flexography	No applicable sources at this facility.
Boilers #1, #2, #3 & #4	Chapter 134	VOC RACT	Exempt per Section 1(C)(4)

#9 and #11 Paper Machines	Chapter 134	VOC RACT	Exempt per Section 1(C)(7)
Boilers #1, #2, #3 & #4	40 CFR Part 60, Subpart D, Da, Db, Dc	Steam Generating Units	All unit constructed prior to 1971 and have not been modified or reconstructed as defined by 40 CFR Part 60, Subpart A
Boilers #1, #2, #3 & #4	40 CFR Part 63, Subpart DDDDD	Industrial, Commercial & Institutional Boilers & Process Heaters	Facility is not a major HAP source.

[MEDEP Chapter 140]

- (7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;
  - B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
  - C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
  - D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[MEDEP Chapter 140]

- (8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license.
- [MEDEP Chapter 140]

### STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA §347-C);
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140; [MEDEP Chapter 140]
- (3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; [MEDEP Chapter 140]  
**Enforceable by State-only**
- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.
- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; [MEDEP Chapter 140]  
**Enforceable by State-only**
- (6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license; [MEDEP Chapter 140]
- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [MEDEP Chapter 140]

- (8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- A. perform stack testing under circumstances representative of the facility's normal process and operating conditions:
    - 1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
    - 2. to demonstrate compliance with the applicable emission standards; or
    - 3. pursuant to any other requirement of this license to perform stack testing.
  - B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
  - C. submit a written report to the Department within thirty (30) days from date of test completion.  
[MEDEP Chapter 140]  
**Enforceable by State-only**
- (9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:
- A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
  - B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

- C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[MEDEP Chapter 140]

**Enforceable by State-only**

- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

- A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

- B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

- C. All other deviations shall be reported to the Department in the facility's semiannual report.

[MEDEP Chapter 140]

- (11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [MEDEP Chapter 140]

- (12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [MEDEP Chapter 140]
- (13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
- (a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
  - (b) The compliance status;
  - (c) Whether compliance was continuous or intermittent;
  - (d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
  - (e) Such other facts as the Department may require to determine the compliance status of the source;
- [MEDEP Chapter 140]

#### **SPECIAL CONDITIONS**

- (14) **Boilers #1, #2, #3 and #4**
- A. Wausau Paper is licensed to operate Boilers #1, #2, #3 and #4 burning #6 fuel oil and on-specification waste oil. [MEDEP Chapter 140, BPT]
  - B. Wausau Paper shall not exceed 11,680,000 gallons of fuel oil fired in Boilers #1, #2, #3 and #4. Compliance shall be demonstrated by records indicating the amount of fuel fired in the boilers. [MEDEP Chapter 140, BPT]
  - C. The sulfur content of the fuel oil fired shall not exceed 2.0% by weight. Wausau Paper shall keep records of the sulfur content for all fuel oil fired in Boilers #1, #2, #3 and #4. Compliance with the sulfur content limit shall be demonstrated by fuel records or receipts from the supplier showing the quantity of fuel delivered and the sulfur content of the fuel as a weight percent. Records of annual fuel use shall be kept on a 12-month rolling total basis. [MEDEP Chapter 140, BPT]
  - D. On-Specification Waste Oil
    - 1. The waste oil to be burned shall meet the criteria for On-Specification Waste Oil.
    - 2. A log shall be kept recording the quantity and type of waste oil burned in any of the four boilers.

3. The amount of On-Specification Waste Oil fired at Wausau Paper shall not exceed 10,000 gallons/year on a 12-month rolling total basis.  
[MEDEP Chapter 140] **Enforceable by State-only**

E. Emissions from Boiler #1 shall not exceed the following limits:

Pollutant	Lb/MMBtu	Origin and Authority	Enforceability
PM	0.15	MEDEP, Chapter 140, BPT	-
NOx	0.35	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>

F. Emissions from Boilers #2, #3 and #4 shall each not exceed the following limits:

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.15	MEDEP Chapter 140, BPT	-

G. NOx limits for Boilers #2, #3 and #4

1. NOx emissions from each of Boilers #2, #3 and #4 shall not exceed 0.40 lb/MMBtu when the boiler is running at, or greater than, 50% of its maximum load.
2. NOx emissions from each of Boilers #2, #3 and #4 shall not exceed 29.2 lb/hour when the boiler is running at less than 50% of its maximum load.  
[MEDEP Chapter 140, BPT] **Enforceable by State-only**

H. Wausau Paper shall operate low-NOx burners on Boilers #1, #2, #3 and #4.  
[MEDEP Chapter 138, MEDEP Chapter 140, BPT]

I. The lb/MMBtu NOx and PM limits shall be demonstrated by compliance testing each boiler every odd calendar year. [MEDEP Chapter 140, BPT]

J. Total stack emissions from Boilers #1, #2, #3 and #4 shall be limited to the following:

Pollutant	lb/hour	Origin and Authority	Enforceability
PM	30.0	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
PM <sub>10</sub>	28.0	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
SO <sub>2</sub>	418.0	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
NOx	90.0	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
CO	6.0	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
VOC	2.0	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>

K. SO<sub>2</sub>, CO and VOC limits are based on a 1-hour block average basis and shall be demonstrated by compliance testing upon request by the Department. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

L. The following firing rates shall not be exceeded:

1. Boiler #1: 147 MMBtu/hr
2. Boilers #2, #3, & #4: 73 MMBtu/hr each
3. Any combination of firing shall not exceed 4000 gallons per three hour period on a rolling total basis as recorded by the combined fuel flow meter.

[MEDEP Chapter 140, BPT] **Enforceable by State-only**

M. Opacity

1. When only one boiler is operating, Wausau Paper shall operate the boiler such that the visible emissions from the stack do not exceed 30% opacity on a 6-minute block average basis, except for no more than two 6-minute block averages in a 3-hour block. (Three hour blocks are defined as periods of three consecutive hours starting at midnight. Blocks do not overlap. A day consists of eight 3-hour blocks.)
2. Except as provided for in Condition (14)(M)(3), when more than one boiler is operating, visible emissions from the combined stack shall not exceed 30% opacity on a 6-minute block average basis except for no more than two 6-minute block averages in a 3-hour block.
3. When more than one boiler is operating, visible emissions may exceed 30% no more than 12 times per calendar year. During these times, stack opacity shall not exceed 40% opacity for more than 18 minutes, recorded as 6-minute averages, in a 3-hour period.
4. Wausau Paper shall maintain a continuous opacity monitor (COM) on the breaching of Stack #1 in accordance with Chapter 117. The COM shall meet the monitoring requirements of 40 CFR Part 60.13 as well as 40 CFR Part 60, Appendices B and F.

[MEDEP Chapter 140, BPT]

N. Wausau Paper shall monitor and record the following as specified, for each of Boilers #1, #2, #3 & #4: [MEDEP Chapter 140, BPT]

Item to monitor for each boiler	Record
Fuel oil firing rate	Continuously

(15) **#9 and #11 Paper Machines and Coating Prep Area**

#9 and #11 Paper Machines are subject to the requirements of MEDEP Chapter 123. [MEDEP Chapter 123]

- A. Wausau Paper shall not use coating solutions containing in excess of 2.9 pounds of VOC per gallon of coating less water and exempt compounds.
- B. Wausau Paper shall maintain records of the amount of coating used and VOC contents of the solutions in accordance with MEDEP Chapter 123 Section (D).

(16) **Solids Mixing Tanks**

A. Wausau Paper is licensed to operate the following solids mixing tanks:

<b>Equipment</b>	<b>Control</b>
#1 Starch Mixing Tank	Baghouse #1
#2 Starch Mixing Tank	Baghouse #2
#1 Blender	Baghouse #3
Abbe Mixer	Baghouse #3
Kady Mill	Baghouse #4
Reid Mixer	Baghouse #4

- B. Opacity from the Solids Mixing Tanks shall be controlled such that visible emissions do not exceed 10% on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period. Wausau Paper shall take corrective action if opacity from any baghouse exceeds 5%. [MEDEP Chapter 101]
- C. Wausau Paper shall conduct daily visible inspections of the baghouses to verify that the baghouses are operating correctly. A log documenting the inspection findings and any corrective action taken shall be maintained. [MEDEP Chapter 140, BPT]

(17) **Parts Washer**

Parts washers at Wausau Paper are subject to MEDEP Chapter 130.

- A. Wausau Paper shall keep records of the amount of solvent added to each parts washer. [MEDEP Chapter 140, BPT]
- B. The following are exempt from the requirements of Chapter 130 [MEDEP Chapter 130]:
  - 1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
  - 2. Wipe cleaning; and,
  - 3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.

- C. The following standards apply to remote reservoir cold cleaning machines that are applicable sources under Chapter 130.
1. Wausau Paper shall attach a permanent conspicuous label to each unit summarizing the following operational standards [MEDEP Chapter 130]:
    - (i) Waste solvent shall be collected and stored in closed containers.
    - (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
    - (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
    - (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
    - (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.
    - (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
    - (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material shall be immediately stored in covered containers.
    - (viii) Work area fans shall not blow across the opening of the degreaser unit.
    - (ix) The solvent level shall not exceed the fill line.
  2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [MEDEP Chapter 130, BPT]

(18) **General Process Sources**

Visible emissions from any general process source not specifically mentioned in this license shall not exceed 20% opacity on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period. [MEDEP Chapter 101]

(19) **Record Keeping Requirements**

For all record keeping required by this license, the licensee shall maintain records of the most current six-year period. [MEDEP Chapter 140, BPT]

**A. Periodic Monitoring Records**

The following records shall be maintained:

1. For the #1, #2, #3 and #4 Boilers:
  - (i) The percent (%) sulfur content of the fuel by weight;
  - (ii) Amount (gallons) of fuel oil fired;
  - (iii) Amount (gallons) and spec. oil classification for each load of spec. oil received at the mill; and
  - (iv) Results of any stacks tests performed once every two calendar years.
2. For the #9 and #11 Paper Machines and Coating Prep Area:
  - (i) VOC content of coatings;
  - (ii) Amount of coatings used; and
  - (iii) Amount of VOC used.
3. For the Solids Mixing Tanks: Records of daily baghouse inspections.
4. For the Parts Washers: Records of solvent added.

**B. Parameter Monitoring Records:**

The following records shall be maintained:

1. For the #1, #2, #3 and #4 Boilers: Fuel oil firing rate into each boiler. (3-hour rolling total)
2. The fuel oil firing rate parameter monitor for each boiler must record accurate and reliable data. If the parameter monitor is recording accurate and reliable data less than 98% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions. **Enforceable by State-only**

**C. COMS Records:**

Wausau Paper operates a COMS on the combined emissions of Boilers #1, #2, #3 and #4.

The following records shall be kept for the COMS at Wausau Paper:

1. Documentation the COMS is continuously accurate, reliable and operated in accordance with Chapter 117, 40 CFR Part 51, Appendix P, and 40 CFR Part 60, Appendices B and F;
2. Records of all measurements, performance evaluations, calibration checks, and maintenance or adjustments for the COMS as required by 40 CFR Part 51 Appendix P;
3. A report of other data indicative of compliance with the applicable emission standards for those periods when the COMS was not in operation or produced invalid data. In the event the Department does not concur with the licensee's compliance determination, the licensee shall, upon the Department's request, provide additional data, and shall have the burden of demonstrating that the data is indicative of compliance with the applicable standard. [MEDEP Chapter 117]

**(20) Quarterly Reporting**

Wausau Paper shall submit a Quarterly Report to the Bureau of Air Quality within 30 days after the end of each calendar quarter, detailing the following, for the control equipment, parameter monitors and Continuous Opacity Monitoring System (COMS) required by this license. [MEDEP Chapter 117]

- A. All control equipment downtimes and malfunctions during source operation.  
Control equipment includes:
  1. Low-NOx burners on Boilers #1, #2, #3 and #4;
  2. Baghouses on the Solids Mixing Tanks.
- B. The COMS downtimes and malfunctions;
- C. All parameter monitor downtimes and malfunctions;
- D. All excess events of emission and operational limitations set by this Order, Statute, state or federal regulations, as appropriate. The following information shall be reported for each excess event;
  1. Standard exceeded;
  2. Date, time, and duration of excess event;
  3. Maximum and average values of the excess event, reported in the units of the applicable standard, and copies of pertinent strip charts and printouts when requested;
  4. A description of what caused the excess event;
  5. The strategy employed to minimize the excess event; and
  6. The strategy employed to prevent reoccurrence.
- E. A report certifying there were no excess emissions, if that is the case.

(21) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on July 31<sup>st</sup> and Jan 31<sup>st</sup> of each year. The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date.

- A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.  
[MEDEP Chapter 140]

(22) **Annual Compliance Certification**

Wausau Paper shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The initial annual compliance certification is due January 31 of each year. The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [MEDEP Chapter 140]

(23) **Annual Emission Statement**

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- A. A computer program and accompanying instructions supplied by the Department; or,
- B. A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator  
Maine DEP  
Bureau of Air Quality  
17 State House Station  
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted no later than specified in Chapter 137.  
[MEDEP Chapter 137]

(24) **Air Toxics Emissions Statement**

If Wausau Paper exceeds the thresholds for HAPs listed in Appendix A of MEDEP Chapter 137 in an inventory year, in accordance with MEDEP Chapter 137 the licensee shall report, as stated in Chapter 137, the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a computer program supplied by the Department or a written emission statement containing the information required in MEDEP Chapter 137. NOTE: Based on emission factors developed by the Eastern Research Group (ERG) in their memo "Development of Average Emission Factors and Baseline Emission Estimates for the Industrial, Commercial and Institutional Boilers and Process Heaters National Emission Standard for Hazardous Air Pollutants" dated October 2002, Wausau Paper will most likely exceed the Chapter 137 thresholds of HAPs based on fuel burning alone should the facility exceed the following firing rates in a calendar year:

Fuel	Control Device	Quantity of fuel before Chapter 137 toxics reporting threshold is exceeded
#6 Fuel Oil	No control	64,725 Gallons

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator  
Maine DEP  
Bureau of Air Quality  
17 State House Station  
Augusta, ME 04333-0017

Phone: (207) 287-2437

[MEDEP Chapter 137]

(25) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, sub-§5	Mercury Emission Limit	Enforceable by State-only

(26) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. An example of such units include refrigerators and any size air conditioner that contain CFCs.

[40 CFR, Part 82, Subpart F]

(27) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Wausau Paper shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

(28) **Certification by a Responsible Official**

All reports (including quarterly reports, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

**Wausau Paper Mill Jay Maine  
Franklin County  
Jay, Maine  
A-149-70-C-R/A**

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

**(29) Annual Fee**

Wausau Paper shall pay the annual air emission license fee within 30 days of December 31 of each year. Pursuant to 38 MRSA 353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under section 341-D, subsection 3.

DONE AND DATED IN AUGUSTA, MAINE THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 2005.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
DAWN R. GALLAGHER, COMMISSIONER

**The term of this license shall be five (5) years from the signature date above.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: February 14, 2005

Date of application acceptance: February 18, 2005

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

This Order prepared by Rachel E. Pilling and Jonathan Voisine , Bureau of Air Quality.