

B. Application Classification

LPT's application was submitted pursuant to the Administrative Revision procedures of Chapter 140 and the Minor Revision procedures in Chapter 115 of the Department's regulations. A separate New Source Review (NSR) Chapter 115 license minor revision, A-177-77-2-M, was drafted to establish the provisions of the NSR revision. Both Orders, the Chapter 140 Administrative Revision and the Chapter 115 New Source Review minor license revision, will be issued simultaneously.

The application for LPT does not violate any applicable federal or state requirements and does not increase emissions of any pollutant. A separate NSR Chapter 115 minor revision has been processed and those provisions are included in this Chapter 140 Administrative Revision.

II. DESCRIPTION OF MINOR REVISION

A. Bleach Plant Scrubber Replacement

LPT plans to install a new scrubber which will be an integral part of meeting the High Volume Low Concentration (HVLC) collection and treatment system required per Chapter 124 and 40 CFR Part 63, Subpart S. LPT operates an existing bleach plant scrubber to meet the requirements of Chapter 122 of the Departments' regulations. LPT has demonstrated that the scrubber is not required for compliance with federal bleach plant MACT requirements. The scrubber is currently operated to comply with the ClO₂ limit of Chapter 122, a state-only requirement.

With the installation of the HVLC system in April 2007, Cl₂ and ClO₂ emissions from the bleach plant will actually become the scrubbing media for TRS collected in the HVLC system. The HVLC system will incorporate a new atomizing spray white liquor scrubber (i.e., the new Cl₂/ClO₂ scrubber) just before the MeOH scrubber (i.e., the existing Cl₂/ClO₂ scrubber) to remove any residual ClO₂ not consumed in the scrubbing of TRS. The new white liquor scrubber will also be used to treat the Cl₂/ClO₂ emissions to Chapter 122 levels during limited periods when the brownstock washers are down and the bleach plant and/or ClO₂ plant is running. The new white liquor scrubber will provide the same level of Cl₂ and ClO₂ Control efficiency as the existing scrubber and is considered Best Available Control Technology (BACT).

The new white liquor scrubber is not a recirculating flow scrubber so the installed flow meter will be recording white liquor flow to the scrubber; not recirculation flow. Additionally, as the scrubbing media will be white liquor (no longer a recirculation flow) with a continuous pH greater than 12.5, LPT has requested that the Chapter 122 monitoring requirement of pH/ORP be deleted. Currently, Condition 21 (F) of LPT's initial Part 70 Air Emissions License, A-177-70-A-I states the following:

- 21(F) LPP shall install, calibrate, record and maintain parameter monitors to determine scrubber recycle flow, ORP and pH. LPP shall record this data once per shift and keep records for six years. Bleach Plant parameter monitors shall be calibrated and in use and data recorded once per shift for at least 90% of the source uptime during each quarter. The facility shall monitor and record the following for the Bleach Plant Scrubber System and the ClO₂ Generation Plant Scrubber System:

Parameter for each scrubber	Recording Frequency	Demonstrated With
Recycle flow	once a shift	flow meter
Fluid ORP/pH	once a shift	probe

The recording of pH is no longer necessary since LPT will use white liquor instead of a recirculation flow to the scrubber. The white liquor will always have a pH consistently greater than 12.5; therefore, the need to measure pH is no longer warranted.

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, and
- will not violate applicable ambient air quality standards, or increment standards either alone or in conjunction with emissions from other sources.

The Department hereby grants this minor revision, A-177-70-I-A, subject to the conditions found in Air Emission License A-177-70-A-I and subsequent amendments, in addition to the following conditions:

LINCOLN PAPER AND TISSUE CO., INC.)
PENOBSCOT COUNTY)
LINCOLN, MAINE)
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DEPARTMENTAL
FINDING OF FACT AND ORDER
AIR EMISSIONS LICENSE
AMENDMENT #6

(1) The following shall replace condition (21)(F) in air license amendment A-177-70-A-I:

21 (F) LPT shall install, calibrate, record and maintain parameter monitors to determine scrubber flow. LPT shall record this data once per shift and keep records for six years. Bleach Plant parameter monitors shall be calibrated and in use and data recorded once per shift for at least 90% of the source uptime during each quarter. The facility shall monitor and record the following for the HVLC/Bleach Plant Scrubber System and the ClO₂ Generation Plant Scrubber System:

Parameter for each scrubber	Recording Frequency	Demonstrated With
Scrubber flow	once a shift	flow meter

(2) The following condition is new and was addressed in LPT's New Source Review Minor Revision, A-177-77-2-M, and shall be included in Air Emissions License, A-177-70-A-I.

(53) LPT shall install a new scrubber to be used as part of its HVLC compliance strategy. The white liquor scrubber system shall have the white liquor flow measured by a flow meter.

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

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

This amendment shall expire concurrently with Air Emission License #A-177-70-A-I

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 6, 2007

Date of application acceptance: March 12, 2007

Date filed with Board of Environmental Protection: _____

This Order prepared by Edwin Cousins, Bureau of Air Quality

LINCOLN PAPER AND TISSUE CO., INC.)
PENOBSCOT COUNTY)
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