

**International Paper
Franklin County
Jay, Maine
A-203-70-A-I**

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

After review of the Initial 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	International Paper Company Androscoggin Mill (IP)
LICENSE NUMBER	A-203-70-A-I
LICENSE TYPE	Initial Part 70 License
NAICS CODES	322121
NATURE OF BUSINESS	Pulp & Paper Mill
FACILITY LOCATION	Jay, Maine
DATE OF LICENSE ISSUANCE	January 12, 2005
LICENSE EXPIRATION DATE	January 12, 2010

B. Emission Equipment

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

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Power Boiler Source Group	PB #1: 680 MMBtu/hr PB #2: 680 MMBtu/hr	Fuel Burning #6 oil, #2 oil, used oil
Waste Fuel Incinerator (WFI)	480 MMBtu/hr	Fuel Burning Biomass, #6 oil, #2 oil, used oil, sludge, waste material
Recovery Boiler Source Group	RB #1: 2.5 MMlb BLS/day RB #2: 3.44 MMlb BLS/day	Process Equipment Black Liquor, #6 oil, used oil
#1 Smelt Dissolving Tank (SDT #1)	2.5 MMlbs BLS/day	Process Equipment Black Liquor, #6 oil, used oil

#2 Smelt Dissolving Tank (SDT #2)	3.44 MMlb BLS/day	Process Equipment
"A" Lime Kiln	248 tons/day of CaO	Process Equipment
"B" Lime Kiln	248 tons/day of CaO	Process Equipment
RTO Source Group	Sources of HVLC gases	Process Equipment
LVHC Source Group	Sources of LVHCs	Process Equipment
Grinders Source Group	6 grinders and grinder flume/ 360 ADTP/day	Process Equipment
Bleach Plant Scrubber Source Group	Pulp Bleaching 1819 ADTP/day	Process Equipment
Methanol Bulk Storage Tank	14,600 gallons	Process Equipment [not currently in use]
Flash Dryer	84 MMBtu/hr	Process Equipment #2 oil
#3 Paper Machine	Infrared Dryers	Process Equipment propane
#4 Paper Machine Source Group	Soft-Nip Calendar Roll Infrared Dryers 2 Air Flootation Dryers	Process Equipment #2 oil, propane
Temporary Units Source Group	Electrical Gen. SICE's Air Compressors Wood Tub Grinders	Process Equipment
Water Treatment Main Furnace	4.1 MMBtu/hr	Fuel Burning #2 oil
Wastewater Treatment Plant Source Group	Wet wells Clarifiers Lagoon	Process Equipment
Landfill		Process Equipment
Printing Press Room	Printing Presses Drying Oven	Process Equipment
Bulk Handling Systems Source Group	Lime Silos Starch Silos	Process Equipment
Condensates Source Group	Digester flash steam condensates Evaporator condensates Pre-evaporator condensates	Process Equipment
Propane Flares		Process Equipment

Production capacities within the Findings of Fact of this license are referenced for the purpose of description only. Capacities that are determined to be a license limit are listed as such within the Order of the license.

IP has additional insignificant activities which do not need to be listed in the emission equipment table above. These include the “Big Daddy” generator, Steam Jenny and Fire Pump all of which were listed on the previous Chapter 115 license, but which are determined to be insignificant for the purposes of the Chapter 140 license. 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.

C. Application Classification

The application for IP does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department’s regulations for a Part 70 source.

D. Definitions / Acronyms

#2 oil – includes #2 fuel oil and diesel fuel

ADTP – Air Dried Ton of Pulp

BACT – Best Available Control Technology

biomass – includes purchased or mill generated biomass such as sludge, wood waste (including bark, knots and screenings, etc.), cotton residue, sawdust absorbed with oil, waste papers, woodroom rejects, wood chips, fines, rocks, and sand

BLS – Black Liquor Solids

CEM – Continuous Emission Monitor

CEMS – Continuous Emissions Monitoring System

CFR – Code of Federal Regulations

CMS – Continuous Monitoring System

COM – Continuous Opacity Monitor

Continuously - a minimum of two points in a one-hour period.

HVLC gases – High Volume Low Concentration Gases (see Section II.H. for a list of sources which are required to be collected by this system)

LVHC gases – Low Volume High Concentration Gases (see Section II.I. for a list of sources which are required to be collected by this system)

MACT – Maximum Achievable Control Technology

MMBtu – Million British Thermal Units

MMlbs BLS/day – Million pounds of Black Liquor Solids per Day

NOx – Nitric Oxide and Nitrogen Dioxide

NSR – New Source Review

NCG – Non-Condensable Gases

PM – Particulate Matter

Sludge – includes onsite waste treatment plant primary and secondary sludge and precipitated calcium carbonate sludge

Solid oily waste – includes oil absorbent pads, rags, booms, etc. and oil absorbed by biomass or speedi-dry and the plastic bags they were collected in. Solid oil waste also includes oil-contaminated soil. Solid oily waste also includes grease product residuals and the plastic bags they were contained in. Solid oily waste also includes oil samples and the plastic bottles they were collected in.

TPY – Tons Per Year

Used oil – includes specification and non-specification recycled or waste oil

VOC – Volatile Organic Compounds

Waste paper – includes office paper, cardboard, paper cores.

II. EMISSION UNIT DESCRIPTION

A. Process Description

IP's Androscoggin Mill pulp mill produces bleached Kraft pulp and groundwood pulp. The bleached pulp is produced in two separate process lines, designated "A" and "B". Groundwood pulp is produced in another separate process line. The Androscoggin Mill paper mill produces a wide variety of paper grades.

Logs and wood chips are received in the Woodyard area, where they are stored and processed for eventual use in the Pulp Mill or Groundwood Mill. Logs destined for the Pulp Mill are debarked and chipped, then transferred to chip storage silos or chip storage piles. Chips are fed from the silos to a set of screens,

and then sent on to the pulp mill. Bark from the debarker and fines from the chip screens are sent to the Waste Fuel Incinerator.

The Groundwood Mill receives debarked logs from the Woodyard. The logs are fed to a set of grinders and mixed with water to form a groundwood pulp slurry which is discharged to the Grinder Flume. From the Grinder Flume, the groundwood pulp is screened and cleaned, sent to deckers for thickening, bleached and sent on to the Paper Mill.

The Pulp Mill consists of two separate, parallel Kraft chemical pulping process lines. Screened chips from the Woodyard are sent to one of the two process lines, designated Pulp Mill "A" and Pulp Mill "B". The "A" line includes a continuous digester, brown stock washing/screening units, pulp storage tanks, process liquid storage tanks and a pulp bleaching system, designated Bleach Plant "A". The "B" side includes a continuous digester, diffusion washing units, screening units, pulp storage tanks, process liquid storage tanks and a pulp bleaching system designated Bleach Plant "B". The chips are reacted with white liquor in the digester to form pulp, which is then washed and screened in brown stock washers and chemically whitened in a series of reaction towers and washers that make up the Bleach Plants. Pulp entering Bleach Plant "A" also passes through an oxygen delignification system that removes additional lignin. The Bleach Plants also receive pulp reclaimed from the Paper Mill and the Wastewater Treatment Plant. Chlorine Dioxide (ClO_2) used in the bleaching process is manufactured in a separate process system. A dual scrubber system controls emissions from certain of the units in the Bleach Plant and the ClO_2 generation system.

Pulp produced at the Androscoggin Mill is either used in the paper mill area or dried in the Flash Dryer for storage and/or sale. Additionally, slush pulp may be sold to a neighboring mill. Knots (uncooked wood chips removed from the pulp by the screening units) are either recycled back to the Digesters, landfilled on site, sent off site, or sent to the Waste Fuel Incinerator for energy recovery. Filtrate from the Brown Stock Washers or the Diffusion Washers, called "weak black liquor" is collected and sent to the Recovery Boiler process area.

Weak black liquor received from the Pulp Mills is fed to Multiple-effect Evaporators where it is concentrated to a solids level that will support combustion. In the Recovery Boilers the black liquor is reduced to form a smelt, which flows out the bottom of the boilers into the Smelt Dissolving Tanks, where it is dissolved to form green liquor. The green liquor is in turn reacted with lime (CaO) to form white liquor and lime mud (CaCO_3). The white liquor is stored for subsequent use in the digesters while the lime mud is oxidized in the Lime Kilns to recover lime.

The Paper Mill consists of all the equipment and operations used to convert pulp to paper, including stock preparation, additive preparation, coating preparation, starch handling, finishing, storage and paper machines.

Non-condensable gases (NCGs) collected throughout the process from certain units in the Pulp Mill are sent to the Lime Kilns for combustion. The high-volume, low-concentration (HVLC) emission streams from certain other units are collected and sent to the Regenerative Thermal Oxidizer where they are incinerated.

Two mutually beneficial operations occur on IP property by two separate commercial entities. Androscoggin Energy LLC operates a cogeneration system used to supply energy in the form of steam and the mill has the option of purchasing electricity. Specialty Minerals, Inc. is a precipitated calcium carbonate plant, using carbon dioxide supplied from the Mill's lime kilns' exhaust.

The Androscoggin Mill produces steam and electric power for mill operations with Power Boilers #1 and #2 and the Waste Fuel Incinerator (WFI). Electricity is also purchased off the grid. Mill operations are also served by, the water/wastewater treatment plant, the landfill, a quality control print laboratory, several small maintenance and repair shops and temporary units.

B. PSD/BACT Review

The Androscoggin Mill has completed a BACT analysis and air dispersion modeling to be used as a PSD application. Actual submittal will be at a later date.

B. MACT

0. Subpart S

IP is subject to the requirements of 40 CFR Part 63, Subpart S. Subpart S includes requirements for the LVHC system, the bleaching system, and the HVLC system.

IP submitted a complete request for a one-year extension to the April 15, 2001 compliance date in a letter to the Department dated February 24, 2000. The request for extension applied to the installation of controls for the LVHC gas collection and treatment and Condensate collection and treatment systems to meet the standards of Subpart S. Additional time was necessary for IP to modify their existing LVHC system to include the Foul Condensate Collection Tank and to construct the hard-pipe system necessary to convey the condensates and introduce them beneath the biological system's liquid surface for treatment (described as the "hard-pipe" option in the Subpart S. The Department approved the extension request in a letter dated March 22, 2000. In granting the extension, the Department required IP to submit quarterly

progress reports for the period of the extension. Thus compliance date for Subpart S requirements pertaining to the LVHC system and the Condensate collection systems was extended to April 15, 2002, with performance testing required to be completed within 180 days of the extended compliance date.

The bleaching system at IP meets the MACT requirements. IP did not request an extension to the compliance date for the bleaching system requirements contained in the Subpart.

IP submitted a complete request for a one-year extension to the April 17, 2006 compliance date in a letter to the Department dated July 18, 2003. The request for extension applied to the installation of controls for the HVLC system to meet the standards of Subpart S. Additional time is necessary for IP to conduct testing on pulping sources to determine applicability of various rule thresholds. This is a complicated evaluation because of the overlap of town and state control rules, BPT, BACT and VOC RACT determinations, and agreements made with the state and the town during the design of IP's existing HVLC control system when it was installed in 1995. IP will use the compliance extension to consider an Equivalency by Permit approval process as an option to rule specific control requirements, if this will best satisfy both HAP and TRS control requirements. The Department approved the extension request in a letter dated September 10, 2003. In granting the extension, the Department required IP to submit semi-annual progress reports (including updates concerning the development of the SSM program) for the period of the extension. Thus the compliance date for Subpart S requirements pertaining to the HVLC system (covering the knotter or screen systems(s), decker systems, and oxygen delignification system(s)) was extended to April 17, 2007, with performance testing required to be completed within 180 days of the extended compliance date.

0. Subpart MM

IP is subject to the requirements of 40 CFR Part 63, Subpart MM. Subpart MM includes requirements for the kraft process combustion sources (recovery furnaces, lime kilns and smelt dissolving tanks.)

IP submitted a complete request for a one-year extension to the March 15, 2004 compliance date in a letter to the Department dated February 13, 2003. The request for extension applied to the installation of controls for the kraft process combustion sources and to the corresponding testing and monitoring requirements to meet the standards of Subpart MM. Additional time is necessary for IP to develop a compliance plan for Subpart MM using a bubble concept. The Department approved the extension request in a letter to IP dated March 4, 2003. In the letter, the extension request was approved pending a commitment from IP to enhance the effectiveness of the #1 Smelt

Dissolving Tank Scrubber, and to have all periodic and parameter monitoring systems in place by March 2004. IP is additionally required to submit biennial control strategy reports in the interim period between the date of the compliance extension and the date that the facility comes into compliance with the requirements of the subpart. Thus the compliance date for Subpart MM requirements pertaining to the Recovery Furnaces, Lime Kilns and Smelt Dissolving Tanks shall be March 15, 2005, with performance testing completed within 180 days of March 15, 2005. Inspection and record keeping requirements will begin on March 15, 2005, with the only exception being operating parameters yet to be established by performance testing.

B. Power Boilers Source Group

Power Boiler #1 was manufactured by Babcock & Wilcox with a heat input of 680 MMBtu/hr. Power Boiler #1 was installed in 1965, prior to the New Source Performance Standards (NSPS) applicability date for Subpart D and Db.

Power Boiler #2 was manufactured by Babcock & Wilcox with a design capacity of 680 MMBtu/hr. Power Boiler #2 was installed in 1967, prior to the NSPS applicability date for Subpart D and Db.

Power Boilers #1 and #2 are licensed to fire #6 fuel oil, #2 fuel oil, and used oil, with the maximum sulfur content of the fuel used not to exceed 1.8% by weight. These boilers are each equipped with retrofit low NOx burner systems utilizing low NOx nozzle caps and NOx CEMS to meet NOx RACT and the limits specified in MEDEP Chapter 138 and this license. Opacity from the Power Boilers is continuously monitored per MEDEP Chapter 117. Emissions exhaust through a common 300 foot stack.

Power Boilers #1 and #2 are located at a major source of Hazardous Air Pollutants (HAPs) and will therefore be 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

IP currently measures opacity from the Power Boilers based on COMS located in the breaching of each Power Boiler stack to the main stack. IP has proposed relocation of the COMS to measure combined opacity in the main stack. Depending on COMS location, IP shall be subject to the following opacity limits:

- a. MEDEP Chapter 101, Section 2(B)(1)(a)(i) contains the only applicable opacity standard for each Power Boiler individually of 30% on a 6-minute block average basis except for no more than two 6-minute block averages in a 3-hour period. **No streamlining requested**

- b. MEDEP Chapter 101, Section 2(B)(5)(i) contains the only applicable opacity standard for the combined emissions from both Power Boilers of 30% recorded as 6-minute block averages, except for no more than three 6-minute block averages in a 3-hour block period. **No streamlining requested.**

2. PM

- a. MEDEP Chapter 103, Section 2(A)(1) contains an applicable PM lb/MMBtu emission standard of 0.20 lb/MMBtu.
- b. A previous BPT analysis established an applicable PM lb/MMBtu emission limit of 0.20 lb/MMBtu.
- c. 40 CFR Part 63, Subpart DDDDD does not contain emission limitations for existing large liquid fuel boilers.

IP accepts streamlining for the PM lb/MMBtu standard. The Chapter 103 and BPT limits are identical and represent the most stringent limit; it is therefore the only PM lb/MMBtu emission limit included in this license.

- d. A previous BPT analysis established an applicable PM lb/hr emission limit of 232.0 lb/hr from the combination of Power Boilers #1 and #2. **No streamlining requested.**

1. PM₁₀

A previous BPT analysis established an applicable PM₁₀ lb/hr emission limit of 232.0 lb/hr from the combination of Power Boilers #1 and #2. **No streamlining requested.**

2. SO₂

- a. MEDEP Chapter 106, Section 2(A)(2) contains an applicable fossil fuel sulfur content standard of 2.0% by weight.
- b. BPT establishes an applicable fossil fuel sulfur content limit of 1.8% by weight.

IP accepts streamlining for fossil fuel sulfur content limit. The BPT limit is the most stringent and is therefore the only fossil fuel sulfur content limit included in this license.

- c. BPT establishes the only applicable SO₂ lb/hr emission limit of 2193.8 lb/hr from the combination of Power Boilers #1 and #2. **No streamlining requested.**

1. NO_x

- a. PB #1 and PB #2 are each equipped with retrofit low NO_x burner systems utilizing low NO_x nozzle caps for control of NO_x emissions. The low

NO_x burners meet the requirements in MEDEP Chapter 138 Section 3(B)(1) to operate a low NO_x burner or equivalent strategy. Therefore, the lb/MMBtu standard in MEDEP Chapter 138 does not apply to PB #1 and PB #2.

- b. BPT establishes the only applicable NO_x lb/MMBtu emission limit of 0.447 lb/MMBtu. **No streamlining requested.**
- c. BPT establishes the only applicable NO_x lb/hr emission limit of 518.5 lb/hr from the combination of Power Boilers #1 and #2 and on a 24 hour block average basis. **No streamlining requested.**

2. CO

BPT establishes the only applicable CO lb/hr emission limit of 38.3 lb/hr from the combination of Power Boilers #1 and #2.

No streamlining requested.

3. Volatile Organic Compounds (VOC)

BPT establishes the only applicable VOC lb/hr emission limit of 11.6 lb/hr.

No streamlining requested.

Periodic Monitoring

Periodic monitoring shall consist of record keeping which demonstrates fuel use and firing rates by PB#1 and PB#2 and delivery receipts or other records from the supplier indicating the percent sulfur by weight of the fuel oil.

IP shall stack test Power Boilers #1 and #2 for PM in accordance with 40 CFR Part 60, Appendix A, Method 5 by December 31, 2004 and every two years thereafter.

Based on best management practices and the type of fuel for which the Power Boilers were designed, it is unlikely that PB#1 or PB#2 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 the Mill to perform testing and may take enforcement action for any violations discovered.

Parameter Monitors

IP shall monitor and record the following as specified, for each of Power Boilers #1 and #2:

Item to be monitored	Record
Fuel oil firing rate	Continuously

CEMS and COMS

- a. MEDEP Chapter 117 contains an applicable requirement to monitor opacity, and nitrogen dioxide emissions.
- . MEDEP Chapter 138 contains an applicable requirement to monitor NOx lb/MMBtu emissions.
- . BPT establishes an applicable requirement to monitor NOx lb/MMBtu emissions.

Based on the above, IP shall operate a CEMS which provides data to calculate NOx lb/MMBtu and O₂ ppm emissions from Power Boilers #1 and #2. Additionally, IP shall operate a COMS on the breaching of each Power Boiler #1 and #2 to the combined stack or a COMS on the combined stack emissions which provides opacity data demonstrated on a six minute block average basis.

Control Equipment

Control Equipment for Power Boilers #1 and #2 consists of low-NOx burners.

B. Waste Fuel Incinerator (WFI)

The WFI was manufactured by Babcock & Wilcox and was installed in 1976, after the NSPS applicability date for Subpart D. The WFI has federally enforceable limits that require it to fire oil at a lower rate than the Subpart D applicability rate of 250 MMBtu/hr. Additionally, the fuel oil supply pipeline to the WFI is maintained as three-quarter inch pipe, and air flow to the oil burner wind box is restricted to the level required for safe, complete combustion of oil at the licensed rate. The WFI is therefore not subject to NSPS requirements.

The WFI is licensed to fire biomass and oil. Biomass shall include sludge, wood waste (including bark, knots and screenings, etc.), cotton residue, sawdust absorbed with oil, and waste papers. Oil shall include #2 and #6 fuel oil, specification used oil, off specification used oil, and oily rags, each with a maximum sulfur content not to exceed 1.8% by weight. The firing rate capacity of the WFI depends on what fuel or fuel mixture is being combusted. The WFI is licensed at the following firing rates:

Fuel	Max Capacity MMBtu/hr
Oil	240
Biomass and Oil	480 (24-hr block average)

Emissions from the WFI are controlled by a variable throat venturi scrubber and demister arrangement, installed with a water spray into the demister. The scrubber media pH is controlled by a weak white liquor and/or a caustic solution, if required. SO₂ emissions are continuously monitored to demonstrate compliance per MEDEP Chapter 106. In addition, the WFI is equipped with a

combustion system designed to ensure the optimal balance between control of NO_x and limitation of CO and VOC. NO_x emission limits are regulated by Chapter 138 and are continuously monitored to meet NO_x RACT. Emissions exit to a 221 foot stack.

The WFI is located at a major source of Hazardous Air Pollutants (HAPs) and will therefore be 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

MEDEP Chapter 101, Section 2(B)(1)(a)(i) contains an applicable opacity standard of 30 percent on a 6-minute block average basis, except for no more than two 6-minute block averages in a 3-hour period.

No streamlining requested.

2. PM

- . MEDEP Chapter 103, Sections 2(A)(1) contains an applicable PM lb/MMBtu emission standard of 0.2 lb/MMBtu.
- . A previous Consent Decree established an applicable PM lb/MMBtu emission limit of 0.1 lb/MMBtu, which is BPT.
- . 40 CFR Part 63, Subpart DDDDD may contain PM lb/MMBtu emission standards which are applicable to this equipment.

IP accepts streamlining for the PM lb/MMBtu standard. The BPT limit is the most stringent and is therefore the only PM lb/MMBtu emission limit included in this license. In addition, once the emission limits for Part 63 come into effect IP has accepted streamlining for PM lb/MMBtu to the BPT standard detailed above or 40 CFR Part 63, Subpart DDDDD, whichever is the more stringent standard.

- . A previous Consent Decree established an applicable PM lb/hr emission limit of 48.0 lb/hr. **No streamlining requested.**

2. PM₁₀

A previous BPT analysis established an applicable PM₁₀ lb/hr emission limit of 48.0 lb/hr. **No streamlining requested.**

2. SO₂

- . MEDEP Chapter 106, Section 2(A)(2) contains an applicable fossil fuel sulfur content standard of 2.0%.
- . BPT establishes an applicable fossil fuel sulfur content limit of 1.8%.

IP accepts streamlining for fossil fuel sulfur content limit. The BPT limit is the most stringent and is therefore the only fossil fuel sulfur content limit included in this license.

- . BPT establishes the only applicable SO₂ lb/MMBtu and lb/hr emission limits of 0.8 lb/MMBtu on a 3-hour rolling average, and 384.0 lb/hr on a 3-hour rolling average. **No streamlining requested.**
- 4. NO_x
 - . MEDEP Chapter 138, Section 4(3) establishes the only applicable NO_x lb/MMBtu emission rate of 0.40 lb/MMBtu, on a 24-hour block average. **No streamlining requested.**
 - . BPT establishes the only applicable NO_x lb/hr emission limit of 192.0 lb/hr. **No streamlining requested.**
- 4. CO
 - . BPT establishes the only applicable CO lb/hr emission limit of 1200.0 lb/hr. **No streamlining requested.**
- 4. Volatile Organic Compounds (VOC)
 - . BPT establishes the only applicable VOC lb/hr emission limit of 140.2 lb/hr. **No streamlining requested.**

Periodic Monitoring

Periodic monitoring shall consist of record keeping which demonstrates fuel use and firing rates by the WFI and fuel analysis records consisting of delivery receipts or other records from the supplier indicating the percent sulfur by weight of the fuel oil, and a metals analysis for used oil. Until the CMS for Subpart DDDDD is installed, operational and data verified pursuant to 40 CFR Part 63.8(c)(3), periodic monitoring for the WFI shall also consist of the following:

Item to be Monitored	Record
Scrubbing fluids media solids	Once every 24 hours
Flue gas pressure drop	Continuously
Scrubbing fluid flow rate (gal/min)	Continuously
Scrubbing fluid pressure from the wet scrubber	Continuously
Total biomass (ton/hr)	Continuously
Total steam production	Continuously

IP shall stack test the WFI for PM in accordance with 40 CFR Part 60, Appendix A, Method 5B by December 31, 2004 and every two years thereafter.

Based on best management practices and the type of fuel for which the WFI was designed, it is unlikely that the emission limits for CO and VOC will be exceeded.

Therefore, periodic monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting the Mill to perform testing and may take enforcement action for any violations discovered.

Parameter Monitors

Until the CMS for Subpart DDDDD is installed and operational, IP shall monitor and record the following as specified, for the WFI:

Item to be monitored	Record
Fuel oil flow rate (gal/min)	Continuously

CEMS and COMS

- . MEDEP Chapter 117 contains an applicable requirement to monitor opacity and nitrogen dioxide emissions.
- . MEDEP Chapter 138 contains an applicable requirement to monitor NOx lb/MMBtu emissions.
- . BPT establishes an applicable requirement to monitor SO₂ and NOx lb/MMBtu emissions.

Based on the above, IP shall operate a CEMS which provides data to calculate NOx and SO₂ lb/MMBtu and O₂ ppm emissions from the WFI.

Control Equipment

Control Equipment for the WFI consists of a venturi scrubber and demister.

B. Recovery Boiler Source Group

Recovery Boiler #1 (RB #1) was manufactured by Combustion Engineering with a maximum process rate of 2.50 MMlb dry Black Liquor Solids (BLS). It was installed at the Androscoggin Mill in 1965 and converted to a low odor design in 1985. The conversion of the RB #1 in 1985 did not result in an emission increase on a lb/hr basis nor did the facility notify EPA that the total cost of the project exceeded 50% of the fixed capital cost of a comparable new facility.

Recovery Boiler #2 (RB #2) is a low odor design boiler manufactured by Babcock and Wilcox with a maximum process rate of 3.44 MMlb BLS/day. The installation of RB #2 was begun in 1975 and completed in 1976. A new furnace and generating section was installed in a major repair project in the fall of 1988. The installation in 1988 did not result in an emission increase on a lb/hr basis nor did the facility notify EPA that the total cost of the repairs exceeded 50% of the fixed capital cost of a comparable new facility.

RB #1 and RB #2 are licensed to fire #6 fuel oil, on-specification used oil, and off-specification used oil, each with a maximum sulfur content not to exceed 0.5% by weight, as startup/supplemental fuels. RB#1 and RB#2 have maximum

design capacities of 315 MMBtu/hr and 405 MMBtu/hr, respectively. Flue gas emissions from the Recovery Boilers are controlled by the operation of an Electrostatic Precipitator (ESP). The ESP is a rigid frame, dry bottom design precipitator powered by Transformer Rectifier (TR) sets. The ESP has the design capacity to control both recovery boiler emissions through one chamber, while the other chamber is down for repairs. Both Recovery Boilers exhaust through a common 240 foot stack.

Emissions of Total Reduced Sulfur (TRS) from Recovery Boilers #1 and #2 are to be controlled in accordance with MEDEP Chapter 124. Compliance with the TRS emission limit shall be demonstrated by CEMs positioned downstream of the control devices to measure TRS concentration and percent O₂ in the emission stream.

NOx RACT for Recovery Boilers #1 and #2 is the operation of NOx CEMS and compliance with the NOx limits specified in this license, on a 24-hour block average basis.

The Recovery Boilers are subject to 40 CFR Part 63, Subpart MM and the general provisions of Subpart A. IP has requested a one-year extension to the compliance date for Subpart MM. The Department has granted the extension request in a letter dated March 4, 2003. IP shall comply with the requirements of Subpart MM by March 14, 2005.

The Recovery Boilers are not electric utility steam generating units and are therefore not subject to NSPS 40 CFR Part 60 Subpart Da. The Recovery Boilers are also not subject to 40 CFR Part 60, Subpart D for fossil fuel fired steam generating units because their annual capacity factor for oil is less than 10 percent. The Recovery Boilers are also not subject to 40 CFR Part 60, Subpart DDDDD for industrial, commercial and institutional boilers because units covered by 40 CFR Part 63 Subpart MM are not subject to the Boiler MACT standards.

IP operates Continuous Opacity Monitors (COM) on the Recovery Boiler combined stack. This COM is required per the CMS requirements of 40 CFR Part 63, Subpart MM only and is not required by MEDEP Chapter 117.

Streamlining

1. Opacity

IP currently measures opacity from the Recovery Boilers based on COMS located on the combined Recovery Boiler stack. IP has proposed relocation of the COMS to a higher location in the main stack. IP shall be subject to the following opacity limits:

- a. MEDEP Chapter 101, Section 2(B)(5) contains an applicable opacity standard for the combined emissions from the Recovery Boilers of 30%

recorded as 6-minute block averages, except for no more than three 6-minute block averages in a 3-hour period.

- b. MACT, 40 CFR Part 63, Subpart MM contains an applicable opacity standard for emissions from each Recovery Boiler. Subpart MM states that corrective action as specified in the startup, shutdown and malfunction plan shall be taken when the average of ten consecutive 6-minute averages results in a measurement greater than 20% opacity. Additionally, IP shall be in violation of Subpart MM if opacity is greater than 35% for 6 percent or more of the operating time within any quarterly period.

IP accepts streamlining for the opacity standard. The Chapter 101 limits are the most stringent and compliance with these will demonstrate compliance with the 35% standard from Subpart MM. The Subpart MM corrective action limit continues to apply to IP, therefore these are the only opacity standards included in this license.

2. PM

- a. MEDEP Chapter 105, Section 2 contains an applicable PM emission standard on a lb/air dried ton of pulp basis of 4 lb/air dried ton of pulp.
- b. MACT, 40 CFR Part 63, Subpart MM contains an applicable PM g/dscm (gr/dscf) emission standard that will be effective by March 13, 2005. IP will comply with the PM standard in 63.862(a)(1)(i)(A) (0.10 g/dscm / 0.044 gr/dscf) or shall establish a PM limit pursuant to 63.862(a)(1)(ii). The emission limit established pursuant to 63.862(a)(1)(ii) shall be submitted as part of the notification of compliance status required under Subpart A of Part 63, pursuant to Section 63.867(b)(1).

Once 40 CFR Part 63, Subpart MM is effective, IP accepts streamlining for the PM standards of MEDEP Chapter 105 and 40 CFR Part 63, Subpart MM. The standard of Subpart MM is determined to be more stringent. Until the limit from Subpart MM takes effect, IP shall meet the Chapter 105 limit of 4.0 lb/air dried ton of pulp.

- c. BPT establishes the only applicable PM lb/hr emission limit of 133.3 lb/hr from the combination of both Recovery Boilers. **No streamlining requested.**

3. PM₁₀

BPT establishes the only applicable PM₁₀ lb/hr emission limit of 133.3 lb/hr from the combination of both Recovery Boilers. **No streamlining requested.**

4. SO₂
 - a. MEDEP Chapter 106, Section 2(A) contains an applicable fossil fuel sulfur content standard of 2% by weight. **No streamlining requested.**
 - . Ambient Air Quality Modeling performed in 1991/1992 established an applicable fossil fuel sulfur content standard of 0.5% by weight. **No streamlining requested.**
 - . BPT establishes the only applicable SO₂ ppmv and lb/MMBtu emission limits of 180 ppmv corrected to 8% O₂ and 806.6 lb/hr on a 3-hour block average. **No streamlining requested.**
0. NO_x
 - . MEDEP Chapter 138, Section 3(C) contains the only applicable NO_x ppm emission standard of 120 ppmv. The MEDEP Chapter 138 standard is on a wet basis. The limit contained in this license is the equivalent of that standard converted to a dry basis, or 206 ppmv, on a 24-hour block average. **No streamlining requested.**
 - . BPT establishes the only applicable NO_x lb/hr emission limit of 213.3 lb/hr from the combination of both Recovery Boilers. **No streamlining requested.**
0. CO

BPT establishes the only applicable CO lb/hr emission limit of 266.6 lb/hr from the combination of both Recovery Boilers. **No streamlining requested.**
0. VOC

BPT establishes the only applicable VOC lb/hr emission limit of 22.3 lb/hr from the combination of both Recovery Boilers. **No streamlining requested.**
0. Total Reduced Sulfur (TRS)

MEDEP Chapter 124, Section 3(H) contains the only applicable TRS ppm emission standard of 5 ppmv on a dry basis, corrected to 8% O₂ on a 12-hour block average. **No streamlining requested.**

Periodic Monitoring

Periodic Monitoring shall consist of record keeping which demonstrates the fuel use and firing rates of the Recovery Boiler and delivery receipts or other records from the fuel supplier indicating the percent sulfur by weight of the fuel oil. Until the CMS for Subpart MM is installed, operational and data verified pursuant to 40 CFR Part 63.8(c)(3), periodic monitoring for the Recovery Boiler shall also consist of the following:

Item to be monitored	Record
Black liquor solids	Once every 24 hours
Fuel oil firing rate	Continuously
Black liquor firing rate	Continuously

IP shall stack test the Recovery Boiler for PM in accordance with 40 CFR Part 60, Appendix A, Method 5 by December 31, 2006 and every two years thereafter.

Based on best management practices and the type of fuel for which the Recovery Boilers were designed, it is unlikely that the Recovery Boilers 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 the Mill to perform testing and may take enforcement action for any violations discovered.

Parameter Monitors

There are no parameter monitors required for the Recovery Boilers.

MACT CMS

MACT, 40 CFR Part 63, Subpart MM contains an applicable requirement to operate a COMS to monitor opacity from the Recovery Boilers in the combined stack. IP shall comply with the requirements of 40 CFR Part 63 Subpart MM by the applicable deadline. The MACT CMS shall be installed, operational and data verified pursuant to 40 CFR Part 63.8(c)(3).

CEMS and COMS

- . MEDEP Chapter 117 contains an applicable requirement to monitor opacity, sulfur dioxide, nitrogen dioxide, and TRS emissions.
- . MEDEP Chapter 138 contains an applicable requirement to monitor NOx ppm emissions.
- . MEDEP Chapter 124 contains an applicable requirement to monitor TRS ppm emissions

Based on the above, IP shall operate a CEMS which provides data to calculate NOx ppm, TRS ppm, O₂ ppm and SO₂ ppm and lb/hr emissions from the Recovery Boilers. Additionally, IP shall operate a COMS on the breaching of each Recovery Boiler #1 and #2 to the combined stack or a COMS on the combined stack emissions which provides opacity data demonstrated on a six minute block average basis.

Control Equipment

Control Equipment for the Recovery Boilers consists of an ESP for particulate emissions.

B. #1 and #2 Smelt Dissolving Tanks

#1 Smelt Dissolving Tank (SDT #1) was installed in 1965, prior to the applicability date of NSPS 40 CFR Part 60 Subpart BB, and has a design capacity of 2.50 MMlb dry BLS/day. Since 1983 SDT #1 has been equipped with a wet

scrubber. A dual-nozzle, wet cyclonic scrubber controls emissions from SDT #1, which then exit to the atmosphere through a 168 foot stack.

#2 Smelt Dissolving Tank (SDT #2) was installed in 1975, prior to the applicability date of NSPS 40 CFR Part 60 Subpart BB, and has a design capacity of 3.44 MMlb dry BLS/day. Since 1976 SDT #2 has been equipped with a wet scrubber. A triple-nozzle, wet cyclonic scrubber controls emissions from SDT #2, which then exit to the atmosphere through a 170 foot stack.

VOC RACT for the Smelt Tanks is determined to be the control of emissions by the wet scrubber systems which complies with MEDEP Chapter 124 for the control of TRS emissions.

The Smelt Tanks are subject to the requirements of NESHAPs for Chemical Recovery Sources at Pulp Mills, 40 CFR Part 63, Subpart MM and the general provisions of Subpart A by March 13, 2005. As part of the conditions of IP's one-year compliance extension for the requirements contained in Subpart MM, IP is required to enhance the effectiveness of the SDT #1 scrubber.

Streamlining

1. Opacity
MEDEP Chapter 101, Section 2(B)(3)(d) contains an applicable opacity standard of 20% on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period. **No streamlining requested.**
2. PM
 - a. MEDEP Chapter 105, Section 2 contains an applicable PM emission standard on a lb/air dried ton of pulp basis from each smelt tank of 0.5 lb/air dried ton of pulp for a 2-hour sampling period.
 - b. 40 CFR Part 63, Subpart MM contains applicable PM kg/Mg (lb/ton) of black liquor solids emission limits which take effect March 13, 2005. IP will comply with the PM standard in 63.862(a)(1)(i)(B) (0.10 kg/Mg / 0.20 lb/ton black liquor solids) or shall establish a PM limit pursuant to 63.862(a)(1)(ii). The emission limit established pursuant to 63.862(a)(1)(ii) shall be submitted as part of the notification of compliance status required under Subpart A of Part 63, pursuant to Section 63.867(b)(1).

Once 40 CFR Part 63, Subpart MM is effective, IP accepts streamlining for the PM standards of MEDEP Chapter 105 and 40 CFR Part 63, Subpart MM. The standard of Subpart MM is determined to be more stringent. Until the Subpart MM limit takes effect, IP shall meet the Chapter 105 limit of 0.5 lb/air dried ton of pulp.

- c. BPT establishes the only applicable PM lb/hr emission limit of 13.7 lb/hr from Smelt Dissolving Tank #1 and 11.7 lb/hr from Smelt Dissolving Tank #2. **No streamlining requested.**

- 2. PM₁₀
BPT establishes the only applicable PM₁₀ lb/hr emission limits of 13.7 lb/hr from Smelt Dissolving Tank #1 and 11.2 lb/hr from Smelt Dissolving Tank #2. **No streamlining requested.**

- 2. SO₂
BPT establishes the only applicable SO₂ lb/hr emission limits of 2.7 lb/hr from Smelt Dissolving Tank #1 and 3.9 lb/hr from Smelt Dissolving Tank #2. **No streamlining requested.**

- 2. TRS
MEDEP Chapter 124, Section 3(J) contains the only applicable TRS lb/ton black liquor solids emission standard of 0.033 lb/ton black liquor solids as H₂S from each Smelt Dissolving Tank. **No streamlining requested.**

- 2. VOC
This source is subject to and has been evaluated for VOC RACT per MEDEP Chapter 134. **No streamlining requested.**

Periodic Monitoring

Until the CMS for Subpart MM is installed, operational, and data verified pursuant to 40 CFR Part 63.8(c)(3), periodic monitoring for the Smelt Tanks scrubbers shall consist of record keeping of scrubber bypass incidents that exceed 5 minutes, and the following:

Item to be monitored	Record
scrubber media flowrate	Continuously
Scrubber fan amps	Continuously

(Note that the periodic monitoring requirements in this license relating to the Smelt Tank scrubber will be superseded by the CMS requirements of 40 CFR Part 63, Subpart MM.

IP shall stack test the Smelt Tanks for PM in accordance with 40 CFR Part 60, Appendix A, Method 5 by December 31, 2005 and every two years thereafter.

IP shall stack test the smelt tanks for TRS in accordance with 40 CFR Part 60, Appendix A by December 31, 2005 and every two years thereafter.

IP shall inspect and replace the Smelt Tanks' scrubber nozzles annually. No sooner than three months and no later than nine months after the annual outage, the Smelt Tanks' scrubber nozzles will be inspected.

MACT CMS

MACT, 40 CFR Part 63, Subpart MM contains an applicable requirement to operate a CMS for the Smelt Tank Scrubbers #1 and #2. IP shall comply with the requirements of 40 CFR Part 63 Subpart MM by the applicable deadline.

The MACT CMS for the Smelt Tank Scrubbers #1 and #2 shall consist of the following in accordance with 40 CFR Part 63, Subpart MM. The MACT CMS shall be installed, operational and data verified pursuant to 40 CFR Part 63.8(c)(3)

Item to be monitored	Record
scrubber media flowrate	3 hr block average once every 3 hours
scrubber fan amperage	3 hr block average once every 3 hours

The CMS range shall be determined, or modified as necessary, according to the procedures as specified in 40 CFR Part 63.864(j).

CEMS and COMS

There are no CEMS or COMS required to be operated for the Smelt Tanks #1 and #2.

Control Equipment

Smelt Tanks #1 and #2 are each equipped with a wet scrubber for particulate emissions.

B. "A" and "B" Lime Kilns

The "A" and "B" Lime Kilns were installed in 1965 and 1975 respectively. "A" Lime Kiln underwent repairs in 1988. Repairs to the "A" Lime Kiln in 1988 did not result in an emission increase on a lb/hr basis nor did the facility notify EPA that the total cost of the repairs exceeded 50% of the fixed capital cost of a comparable new facility. Design parameters for the two lime kilns are identical. Design production capacity is 248 tons CaO/day from each kiln.

Each kiln fires #6 fuel oil, #2 fuel oil, propane, or on or off specification used oil with a design capacity of 8 gal/min (72 MMBtu/hr) to aid in the recalcination of the lime. The fuel oil is limited to 1.8% sulfur by weight. The kilns also fire Non Condensable Gases (NCGs) generated by the pulping process. Each kiln is capable of subjecting NCG gases to 1200 °F for at least 0.5 seconds. Both the "A" Lime Kiln and "B" Lime Kiln serve as the primary and backup NCG and TRS control devices as required by Chapter 124.

In addition, International Paper made minor adjustments to each Lime Kiln in 1995 to allow for the combustion of NCG and TRS gases without the presence of lime mud within the kiln (referred to as the tertiary backup system.) Part of the project involved the installation of an NCG scrubber to scrub the sulfur gases prior to their entry into the kiln. The scrubber uses a white liquor shower through a packing medium and it is only required to operate when NCG's are being consumed in the kiln without the presence of lime. When lime is present, the lime mud itself is an effective media to scrub SO₂ emissions generated from the incineration of TRS gases. Since scrubber emissions continue in the NCG collection system to the lime kilns, the NCG Scrubber has no air emissions and was approved by the Bureau of Air Quality for installation without a license amendment.

Particulate emissions from the "A" Lime Kiln are controlled by an Airpol fixed throat venturi scrubber. Particulate emissions from the "B" Lime Kiln are controlled by a Peabody variable throat venturi scrubber. The scrubbers may be operated with water, a weak wash solution or a caustic solution as the scrubbing media. The lime mud itself is also an effective media to scrub SO₂ emissions generated from the incineration of Total Reduced Sulfur Compounds (TRS). Controlled emissions from each Lime Kiln are vented to the atmosphere through separate 100 foot stacks.

The control of VOC emissions by maintaining adequate combustion conditions within the lime kiln to meet a TRS emission limit of 8 ppmv corrected to 10% O₂ on a dry basis, as required by MEDEP Chapter 124, is determined to meet VOC RACT. To demonstrate compliance with the TRS limit, TRS concentration and percent O₂ in the emission stream are measured with CEMS downstream of the kilns.

The Lime Kilns are subject to the requirements of NESHAPs for Chemical Recovery Sources at Pulp Mills, 40 CFR Part 63, Subpart MM and the general provisions of Subpart A by March 13, 2005.

Streamlining

1. Opacity
MEDEP Chapter 101, Section 2(B)(3)(d) contains an applicable opacity standard of 20% on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period. **No streamlining requested.**
2. PM
 - a. MEDEP Chapter 105, Section 2 contains an applicable PM emission standard on a lb/air dried ton of pulp basis of 1.0 lb/air dried ton of pulp from each Lime Kiln for a 2-hour sampling period.

- b. BPT establishes an applicable PM gr/dscf emission standard of 0.13 gr/dscf corrected to 10% O₂ for the "A" Lime Kiln.
- c. MACT, 40 CFR Part 63, Subpart MM contains an applicable PM g/dscm (gr/dscf) emission standard which take effect March 13, 2005. IP will comply with the PM standard in 63.862(a)(1)(i)(C) (0.15 g/dscm / 0.064 gr/dscf) or shall establish a PM limit pursuant to 63.862(a)(1)(ii). The emission limit established pursuant to 63.862(a)(1)(ii) shall be submitted as part of the notification of compliance status required under Subpart A of Part 63, pursuant to Section 63.867(b)(1) and as a major license amendment pursuant to Chapter 140.

Once 40 CFR Part 63, Subpart MM is effective, IP accepts streamlining for the PM standards of MEDEP Chapter 105 and 40 CFR Part 63, Subpart MM. The standard of Subpart MM is determined to be more stringent. Until the limit from Subpart MM takes effect, IP shall meet the BPT limit of 0.13 gr/dscf from each of the "A" and "B" Lime Kilns. This limit is the most stringent that applies to the kilns.

- d. BPT establishes the only applicable PM lb/hr emission limit of 25.5 lb/hour from the "A" Lime Kiln and 25.0 lb/hour from the "B" Lime Kiln.
No streamlining requested.

3. PM₁₀
BPT establishes the only applicable PM₁₀ lb/hr emission limit of 25.5 lb/hr from the "A" Lime Kiln and 25.0 lb/hour from the "B" Lime Kiln.
No streamlining requested.

4. SO₂
 - a. BPT establishes the only applicable fossil fuel sulfur content limit of 1.8% by weight. **No streamlining requested.**
 - b. MEDEP Chapter 106, Section 4 contains the only applicable SO₂ lb/MMBtu emission standard of 1.92 lb/MMBtu in any 24-hour period.
 - c. BPT establishes the only applicable SO₂ lb/hr emission limit of 6.7 lb/hr except when the Lime Kilns are operating as the Tertiary Backup System and combusting NCG and TRS gases without the presence of lime mud within the kiln.

IP accepts streamlining for the SO₂ standards of MEDEP Chapter 106 and BPT. The BPT standard, on a lb/hr basis, is more stringent than the MEDEP Chapter 106 lb/MMBtu standard converted to lb/hr. The BPT limit is therefore the only standard of the two included in this license.

- 5. NO_x
 - a. MEDEP Chapter 138, Section 3(E)(1) contains the only applicable NO_x ppm emission standard of 120 ppmv, corrected to 10% O₂, on a 1-hour average. **No streamlining requested.**
 - . BPT establishes the only applicable NO_x lb/hr emission limit of 33.3 lb/hr. **No streamlining requested.**

- 0. CO
BPT establishes the only applicable CO lb/hr emission limit of 333.3 lb/hr. **No streamlining requested.**

- 0. TRS
MEDEP Chapter 124, Section 3(K) establishes the only applicable TRS ppm emission limit of 20 ppmv, corrected to 10% O₂ on a 12-hour block average. **No streamlining requested.**

- 0. VOC
 - . This source is subject to and has been evaluated for VOC RACT per MEDEP Chapter 134. **No streamlining requested.**
 - . BPT establishes the only applicable VOC lb/hr emission limit of 1.4 lb/hour. **No streamlining requested.**

Periodic Monitoring

Periodic monitoring shall consist of record keeping which demonstrates fuel use and firing rates by the “A” and “B” Lime Kilns and delivery receipts or other records from the fuel supplier indicating the percent sulfur by weight of the fuel oil.

Until the CMS for Subpart MM is installed, operational and data verified pursuant to 40 CFR Part 63.8(c)(3), periodic monitoring for the “A” and “B” Lime Kilns shall also consist of the following:

For the “A” Lime Kiln:

Item to be monitored	Record
High pressure pressure	Once every 8 hours
High pressure flow	Once every 8 hours
Low pressure flow	Once every 8 hours

For the “B” Lime Kiln:

Item to be monitored	Record
Scrubber pressure drop	Once every 8 hours
Scrubber media flowrate	Once every 8 hours

(Note that the periodic monitoring requirements in this license relating to the “A” and “B” Lime Kilns scrubbers will be superseded by the CMS requirements of 40 CFR Part 63, Subpart MM.

IP shall stack test the “A” and “B” Lime Kilns for PM in accordance with 40 CFR Part 60, Appendix A, Method 5 by December 31, 2004 and every two years thereafter.

IP shall stack test the “A” and “B” Lime Kilns for NOx as required by MEDEP Chapter 138(3)(E)(2) in accordance with 40 CFR Part 60, Appendix A, Method 7E by December 31, 2004 and every two years thereafter.

Based on best management practices and the type of fuel for which the “A” and “B” Lime Kilns were designed, it is unlikely that the Lime Kiln 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 the Mill to perform testing and may take enforcement action for any violations discovered.

MACT CMS

MACT, 40 CFR Part 63, Subpart MM contains an applicable requirement to operate a CMS for the “A” and “B” Lime Kiln Scrubbers. IP shall comply with the requirements of 40 CFR Part 63 Subpart MM by the applicable deadline.

The MACT CMS for the “A” and “B” Lime Kiln Scrubbers shall consist of the following in accordance with 40 CFR Part 63, Subpart MM. The MACT CMS shall be installed, operational and data verified pursuant to 40 CFR Part 63.8(c)(3).

For the “A” Lime Kiln:

Item to be monitored	Record
High pressure pressure	Once every 8 hours
High pressure flow	Once every 8 hours
Low pressure flow	Once every 8 hours

For the “B” Lime Kiln:

Item to be monitored	Record
Scrubber pressure drop	3 hr block ave once every 3 hours
Scrubbing liquid flowrate	3 hr block ave once every 3 hours

The CMS parameter range shall be determined, or modified as necessary, according to the procedures as specified in 40 CFR Part 63.864(j) and in accordance with Chapter 140.

CEMS and COMS

- a. MEDEP Chapter 117 contains an applicable requirement to monitor TRS emissions.
- . MEDEP Chapter 124 contains an applicable requirement to monitor TRS ppm emissions.

There are no COMS required to be operated for the Lime Kilns. Based on the above, IP shall operate a CEMS which provides data to calculate TRS ppm and O₂ ppm emissions from the Lime Kilns.

Control Equipment

Control Equipment for the “A” Lime Kiln consists of an Airpol fixed throat venturi scrubber. Control Equipment for the “B” Lime Kiln consists of a Peabody variable throat venturi scrubber.

B. RTO Source Group

The RTO (Regenerative Thermal Oxidizer) Source Group includes several emission units in several of the process areas at the mill which emit high volume-low concentration (HVLC) gases that are sent to the RTO for destruction. The emission units whose emissions are handled by the HVLC system and are thus included in the RTO Source Group are the following:

- Regenerative Thermal Oxidizer System
- “A” Chip Bin
- “A” Knotters
- “A” Brown Stock Washers
- “A” #1 Seal Tank
- “A” #2 Seal Tank
- Oxygen Delignification System
- “B” Chip Bin
- Black Liquor Storage Tanks
 - #1 and #2 Recovery Boiler Mix Tanks
 - West Precipitator Mix Tank
 - East Precipitator Mix Tank
 - 52% Black Liquor Tank
 - 63% Black Liquor Tank

IP operates one Brown Stock Washer System “A”, which was installed in 1965, prior to the NSPS applicability date for Subpart BB.

VOC RACT for the Brown Stock Washer System “A” is the control of VOC emissions by the RTO System which complies with Chapter 124 for the control of TRS emissions.

The Oxygen Delignification (OD) System was installed at the Androscoggin Mill in 1994 and is located in the "A" Pulp Mill between the Brown Stock Washer System and the primary screen feed chest in the "A" wetroom. The OD System is a "prebleaching" operation to remove residual lignin after the brown stock washers, and prior to sending the pulp to the bleach plant. It includes medium consistency pump, mixers, a seal tank, a washer drum with a washer hood, washer vat pressure reactor, reaction tower and oxygen delivery system. Pulp is pumped from the brown stock washer and injected with oxygen, caustic and steam. After mixing, the pulp enters the reactor or vessel, gas separator, reaction tower and then the washer system. From the washer the pulp is sent back to the primary screen chest. The design capacity of the OD System is the same as that of the "A" Digester.

The RTO System was installed during the fall of 1995 with the primary purpose of collecting and controlling TRS emissions from the brown stock washer systems and VOC emissions from the OD System. The RTO System may also be used to collect and control emissions from the sources that make up the RTO Source group as listed above to comply with 40 CFR 63 Subpart S, Maximum Achievable Control Technology (MACT) Standards.

The RTO has a maximum design heat input of 8.0 MMBtu/hr firing propane and #2 fuel oil with a maximum sulfur content of 0.3% as supplementary fuels to maintain a 1500 °F combustion temperature for 0.5 seconds to comply with MEDEP Chapter 124 for control of TRS from Kraft Pulp Mills. SO₂ emissions are created as a result of combusting TRS gases in the RTO. Emissions from the RTO are controlled by a wet scrubber and are vented to the atmosphere through a 150 foot stack.

BACT for the RTO, established in License A-203-71-M-A, issued July 31, 1995, requires continuous monitoring devices be operated on the RTO System to record the scrubbing media pH or conductivity of the RTO Wet Scrubber and the combustion temperature inside the RTO.

It should be noted that although a collection system can be installed, it is not technically feasible to collect 100% of all emissions. For example, completely enclosed collection systems have been installed around the brown stock washers and small wisps of steam are still visible around the rotational axes of the washers. The emission wisps are the result of back pressure within the long piping system, the fans involved, and system variations of the washers themselves. IP has proposed that to eliminate such wisps would be technically infeasible without installing a vacuum on the room itself. The Department has viewed the current collection system and has found that the system collects all feasible emissions and meets the definition of a permanent total enclosure. The

Department agrees that any additional collection modifications to prevent wisps of emissions would be neither technically feasible nor economically justified.

IP shall control TRS from TRS sources as required by MEDEP Chapter 124.

By April 17, 2007, IP shall collect and treat HAP emissions from the knotter or screen systems, pulp washing systems, decker systems and oxygen delignification system to meet the requirements of 40 CFR Part 63 §63.443.

Streamlining

1. PM

BACT determined in License A-203-71-M-A, issued on July 31, 1995 establishes the only applicable PM lb/hr emission standard of 1.0 lb/hr. **No streamlining requested.**

1. PM₁₀

BACT determined in License A-203-71-M-A, issued on July 31, 1995 establishes the only applicable PM₁₀ lb/hr emission limit of 1.0 lb/hr. **No streamlining requested.**

1. SO₂

. BACT determined in License A-203-71-M-A, issued on July 31, 1995 establishes the only applicable fossil fuel sulfur content limit of 0.3% by weight. **No streamlining requested.**

. BACT determined in License A-203-71-M-A, issued on July 31, 1995 establishes the only applicable SO₂ lb/hr emission limit of 2.02 lb/hr. **No streamlining requested.**

1. NO_x

BACT, determined in License A-203-71-M-A and amended in License A-203-71-AC-A, issued October 15, 1996, establishes the only applicable NO_x lb/hr emission standard of 1.71 lb/hr. TPY. **No streamlining requested.**

1. CO

BACT determined in License A-203-71-M-A, issued on July 31, 1995 establishes the only applicable CO lb/hr emission limit of 1.2 lb/hr. **No streamlining requested.**

1. VOC

BACT determined in License A-203-71-M-A, issued on July 31, 1995 establishes the only applicable VOC lb/hr emission limit of 3.0 lb/hr. **No streamlining requested.**

1. TRS

BACT determined in License A-203-71-M-A, issued on July 31, 1995 establishes the only applicable TRS lb/hr emission limit of 0.2 lb/hr. **No streamlining requested.**

Periodic Monitoring

Periodic monitoring shall consist of record keeping which demonstrates fuel use and firing rates by the RTO and delivery receipts or other records from the fuel supplier indicating the percent sulfur by weight of the fuel oil.

Periodic monitoring for the RTO shall also consist of the following:

Item to be monitored	Record
Scrubbing media pH or conductivity	Continuously
RTO Combustion Temperature	Continuously

IP shall perform stack testing on the RTO once during the life of this permit to determine compliance with emission limits for the criteria pollutants and TRS.

MACT CMS

MACT, 40 CFR Part 63, Subpart S, contains an applicable requirement to operate a CMS for the RTO. The MACT CMS for the RTO shall consist of the following, by the MACT extension date of April 17, 2007, granted in a letter from MEDEP dated September 10, 2003:

Item to be monitored	Record
RTO Combustion Temperature	Continuously

CEMS and COMS

There are no CEMS or COMS required to be operated for the RTO.

Control Equipment

There is no control equipment operated for the RTO.

B. LVHC Source Group

The LVHC Source Group consists of a variety of emission units in several of the process areas of the mill that emit non-condensable gases (LVHC gases) which are sent to the Lime Kilns for destruction. Specifically, the LVHC Source Group consists of the following emission units:

- "A" Digester
- "B" Digester
- "A" Evaporators

- “B” Evaporators
- #1 Blow Tank
- #2 Blow Tank
- Condensate Collection Tank (CCT)

The “A” and “B” Digesters are Kamyr continuous digesters installed in 1965 and 1975, respectively, prior to the applicability date for NSPS 40 CFR Part 60, Subpart BB.

The “A” and “B” Evaporator Systems are non-contact multiple effect evaporators that concentrate weak black liquor from the digesters. “A” Evaporator System was designed and manufactured by Goslin-Birmingham in 1965, with a capacity of 2.50 MMlb dry BLS/day. “B” Evaporator System was designed and manufactured by Unitech Company in 1975, with a capacity of 3.44 MMlb dry BLS/day. The evaporator systems are not subject to NSPS 40 CFR Part 60, Subpart BB.

VOC RACT for the “A” and “B” Digesters and Evaporators is the control of emissions by incineration in the Lime Kiln in accordance with Chapter 124.

IP is subject to 40 CFR Part 63, Subpart S, NESHAPs for the Pulp and Paper Industry, and the general provisions of Subpart A which requires the collection of pulping process condensates and the reduction of total HAP emissions from the mill. IP has selected the “hard-pipe” option described in §63.446, in which pulping process condensates are collected and conveyed in a closed collection system, and discharged below the liquid surface of a biological treatment system. The Condensate Collection Tank (CCT) and associated piping were installed by April 15, 2002, to meet these requirements of 40 CFR Part 63, Subpart S, for the LVHC System.

The Condensate Collection Tank (CCT) is a vertical cylindrical fixed-roof tank with a storage capacity of approximately 41,500 gallons. The tank is used as a flow-through process tank and collects digester flash condensates, evaporator condensates and pre-evaporator condensates, holds them, and feeds them in a metered stream to the aeration lagoon. The CCT is equipped so that the fixed roof and all openings are operated with no detectable leaks and each opening is maintained in a closed, sealed position at all times that the tank contains condensates (except when it is necessary to use the openings for sampling, removal, equipment inspection, maintenance or repair). A water seal device at the top of the tank provides pressure and vacuum seal protection from over-design conditions. Condensate gases from the CCT are vented through a closed-vent system to the NCG collection system, and then incinerated in the lime kilns.

IP shall not allow venting of TRS from the LVHC system or associated equipment which:

- 0. exceeds 40 minutes in duration; or
- 0. contributes to an aggregate TRS venting of more than 1.0% of quarterly operation time.

VOC RACT for the “A” and “B” Digesters and the “A” and “B” Evaporator Systems is the control of VOC emissions by “A” and “B” Lime Kilns which complies with Chapter 124 for the control of TRS emissions.

Periodic Monitoring

MACT, 40 CFR Part 63, Subpart S, contains an applicable requirement to operate the LVHC Collection System with no detectable leaks. Periodic monitoring for the Condensate Collection System (CCS) is the following, in accordance with MACT standards:

Item to be monitored	Record
LVHC collection system piping leak detection	Monthly
LVHC collection system pressure demonstration	Annually

B. Grinders Source Group

The Grinders Source Group consists of six grinders and the grinder flume. The grinders receive debarked logs from the Woodyard and discharge groundwood pulp slurry that is conveyed by the grinder flume. The Grinders Source Group has the capacity to produce 360 air dried tons of unbleached pulp per day. Emissions from the Grinders Source Group vent to four emission points.

IP conducted an alternative VOC RACT for the Grinders Source Group pursuant to Chapter 134. Control alternatives considered included thermal oxidation, incineration, adsorption, absorption and condensation, of which only thermal oxidation was found to be a technically feasible option. Although technically feasible, thermal oxidation is not an economically feasible option, costing about \$8,500 per ton of VOC abated. Furthermore, thermal oxidation requires the combustion of a supplemental fuel, which results in corollary negative environmental impacts. VOC RACT for the Grinders Source Group is continued employment of good operational controls and maintenance procedures.

IP received approval to install a water jet sharpening/conditioning system to operate on the groundwood stones in Amendment A-203-71-BF-A to their Chapter 115 license. The water jet sharpening system utilizes an ultra-high pressure water jet to remove material from the surface of the stone, thus sharpening and maintaining the grinding stone. This increases stone life and

decreases the downtime associated with mechanical sharpening. BACT for the proposed system was determined to be no control in License A-203-71-BF-A.

VOC RACT testing conducted in 1995 in the groundwood area determined a VOC emission rate for the groundwood mill of 5.51 lb VOC/ADTP. With the installation of the water jet system, the grinders have the potential to emit 374.6 TPY VOC.

B. Bleach Plant Scrubber Source Group

IP operates two bleach plants. The individual bleach plants are referred to as the "A" and "B" bleach plants. Each bleach plant physically and chemically whitens the brown stock pulp (and also pulp reclaimed from the mill's paper mill and wastewater treatment process) in a series of reaction towers and washers. Chlorine dioxide, used in each of the bleach plants, is manufactured in a separate system. This system is vented to the bleach plant emissions control system.

Dual packed-tower scrubbers (ClO₂ and Cl₂ scrubbers) treat the gases from both the "A" and "B" bleach plants before emitting gases through a common stack. Each scrubber is a packed column using white liquor or weak wash as the scrubbing media. The "A" bleach plant may operate with either the Cl₂ scrubber or the ClO₂ scrubber operating alone; the "B" bleach plant may operate with only the Cl₂ scrubber alone.

VOC RACT for the Bleach Plants "A" and "B" was determined to be the control of VOC emissions by the bleach plant scrubbers systems which comply with Chapter 122 for the control of chlorine and chlorine dioxide emissions and the discontinued use of sodium hypochlorite as a primary bleaching stage.

The "A" and "B" Bleach Plants are subject to the requirements of NESHAPs from the Pulp and Paper Industry, 40 CFR Part 63, Subpart S and the general provisions of Subpart A by the dates required in Subpart S.

Streamlining

1. Cl₂ and ClO₂

MEDEP Chapter 122, Section (3)(A) and (B) contain applicable Cl₂ and ClO₂ lb/hr emission standards of 3.0 lb/hr and 3.0 lb/hr, respectively. **No streamlining requested.**

2. VOC

This source is subject to, has been evaluated for and meets VOC RACT per MEDEP Chapter 134. **No streamlining requested.**

3. HAPs

MACT, 40 CFR Part 63 Subpart S contains applicable compliance options at 63.445(c) for emissions of chlorinated HAPs. **No streamlining requested.**

Periodic Monitoring

MEDEP Chapter 122 contains an applicable requirement to monitor recycle flow, ORP, scrubber pressure drop and pH. IP was granted approval to monitor scrubber influent pH and ORP in lieu of monitoring pH and ORP at the bleach plant scrubbers' effluent and fan amps for the bleaching system gas scrubbers vent gas fans in lieu of monitoring vent gas inlet flow rate in two letters from EPA, both dated March 14, 2001. Periodic monitoring shall consist of the following (in accordance with EPA approval letters) for each Bleach Plant Scrubber System, and meets both Chapter 122 and the MACT monitoring requirements:

Item to be monitored	Record
scrubber recycle flow	once every 8 hours
scrubber pressure drop	once every 8 hours
scrubber influent pH	once every 8 hours
scrubber influent ORP	once every 8 hours
Scrubber fan amps	once every 8 hours

IP shall stack test the Bleach Plant Scrubber Systems every year in accordance with NCASI Method 520 to demonstrate compliance with Cl₂ and ClO₂ emission rates and Subpart S.

Control Equipment

Control equipment for the Bleach Plant Scrubber Source Group consists of the Bleach Plant Scrubbers. The scrubbers may be operated with a white liquor solution or a caustic solution as the scrubbing media.

B. Methanol Bulk Storage Tank

IP operates one above ground, direct feed, methanol bulk storage tank, with a capacity of 14,600 gallons. The tank was installed in 1988, and is subject to NSPS 40 CFR Part 60, Subpart Kb for Volatile Organic Liquid Storage Vessels constructed after July 23, 1984.

EPA has not yet determined if the Methanol Bulk Storage Tank is subject to 40 CFR 63 Subpart EEEE, National Emission Standards for Organic Liquid Distribution (Non-Gasoline).

The Methanol Bulk Storage Tank is not in use at the writing of this license.

L. Flash Dryer

IP operates a Flash Dryer that is used to dry wet pulp produced at the Androscoggin Mill for storage and/or sale. The flash dryer receives a combination of hot furnace air and ambient air via two separate fans. The exhaust flow from each dryer passes through two large cyclones and is then drawn by a cooling fan through two smaller cyclones. The hot air furnace unit fires #2 fuel oil with a maximum sulfur content not to exceed 0.3% by weight, at a maximum of 10 gallons per minute (84 MMBtu/hr). The Flash Dryer firing rate is physically limited by an orifice plate installed in the equipment.

IP evaluated VOC and NO_x RACT controls for the Flash Dryer and found that there are no technically or economically feasible control options that are capable of reducing the VOC and NO_x emissions. Therefore, the Bureau of Air Quality has determined that the current equipment and operation to meet the NO_x lb/MMBtu and VOC lb/hr emission limits, which includes the firing of only 0.3% sulfur #2 fuel oil, are receiving RACT.

Streamlining

0. Opacity

MEDEP Chapter 101, Section (2)(B)(1)(b) contains the only applicable opacity standard of 20% on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period. **No streamlining requested.**

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0. PM

BPT, determined in License A-203-71-BG-A, issued November 5, 2004 establishes the only applicable PM lb/hr limit of 5.0 lb/hr. **No streamlining requested.**

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0. PM₁₀

BPT, determined in License A-203-71-BG-A, issued November 5, 2004, establishes the only applicable PM₁₀ lb/hr limit of 0.6 lb/hr. **No streamlining requested.**

0. SO₂

- . MEDEP Chapter 106, Section 2(A)(2) contains an applicable fossil fuel sulfur content standard of 2.0%.
- . BPT, determined in License A-203-71-E-R, issued October 4, 1995, establishes an applicable fossil fuel sulfur content standard of 0.3%.

IP accepts streamlining for fossil fuel sulfur content limit. The BPT limit is the most stringent and is therefore the only fossil fuel sulfur content limit included in this license.

- . BPT, determined in License A-203-71-E-R, issued September 4, 1996, establishes the only applicable SO₂ lb/hr emission limit of 25.4 lb/hr. **No streamlining requested.**
- 0. NO_x
NO_x RACT, determined in License A-203-71-R-A, issued October 4, 1995, establishes the only applicable NO_x lb/MMBtu and lb/hr emission limits of 0.14 lb/MMBtu and 11.8 lb/hr. **No streamlining requested.**
- 4. CO
BPT establishes the only applicable CO lb/hr emission limit of 3.0 lb/hr. **No streamlining requested.**
- 4. VOC
BPT establishes the only applicable VOC lb/hr emission limit of 0.6 lb/hr. **No streamlining requested.**

Periodic Monitoring

Periodic Monitoring shall consist of record keeping which demonstrates fuel use by the Flash Dryer and delivery receipts or other records from the fuel supplier indicating the percent sulfur by weight of the fuel oil.

Compliance with the emission limits for the Flash Dryer shall be demonstrated through testing on the request of the Department.

Parameter Monitors

There are no Parameter Monitors required for the Flash Dryer.

CEMS and COMS

There are no CEMS or COMS required for the Flash Dryer.

Control Equipment

Control equipment for the Flash Dryer consists of four cyclones. Within six months of the signature date of this license, IP shall evaluate the Flash Dryer controls and submit a report to the DEP.

B. #3 Paper Machine

Infrared coater dryer units are operated on the #3 Paper Machine. The dryers fire propane at a maximum heat input of 13.92 MMBtu/hr.

Based on the use of propane as fuel, the Department finds that the #3 Paper Machine Infrared dryers are meeting BPT.

Streamlining

1. Opacity

- . MEDEP Chapter 101, Section 2(B)(3)(d) contains an applicable opacity standard of 20% on a 6-minute block average, except for no more than one 6-minute block average in a 1-hour period.
- . BACT, determined in License A-203-71-AU-A, issued December 20, 1999, establishes an applicable opacity standard of 10% opacity on a 6-minute block average basis.

IP accepts streamlining for the opacity standard. The BACT limit is the most stringent; therefore it is the only opacity standard included in this license.

1. PM

- . BACT, determined in License A-203-71-AU-A, issued December 20, 1999, establishes the only applicable PM lb/MMBtu emission limit of 0.05 lb/MMBtu. **No streamlining requested.**
- . BACT, determined in License A-203-71-AU-A, issued December 20, 1999, establishes the only applicable PM lb/MMBtu emission limit of 0.70 lb/hr. **No streamlining requested.**

1. PM₁₀

BACT, determined in License A-203-71-AU-A, issued December 20, 1999, establishes the only applicable PM₁₀ lb/hr emission limit of 0.70 lb/hr. **No streamlining requested.**

1. SO₂

BACT, determined in License A-203-71-AU-A, issued December 20, 1999, establishes the only applicable SO₂ lb/hr emission limit of 0.05 lb/hr. **No streamlining requested.**

1. NO_x

BACT, determined in License A-203-71-AU-A, issued December 20, 1999, establishes the only applicable NO_x lb/hr emission limit of 2.0 lb/hr. **No streamlining requested.**

1. CO

BACT, determined in License A-203-71-AU-A, issued December 20, 1999, establishes the only applicable CO lb/hr emission limit of 2.2 lb/hr. **No streamlining requested.**

1. VOC

BACT, determined in License A-203-71-AU-A, issued December 20, 1999, establishes the only applicable VOC lb/hr emission limit of 0.14 lb/hr. **No streamlining requested.**

Periodic Monitoring

Periodic Monitoring shall consist of record keeping which demonstrates fuel use and receipts showing the sulfur percent of the fuel.

Parameter Monitors

There are no Parameter Monitors required for the #3 Paper Machine.

CEMS and COMS

There are no CEMS or COMS required to be operated for the #3 Paper Machine.

Control Equipment

There is no control equipment operated for the #3 Paper Machine.

B. #4 Paper Machine Source Group

The #4 Paper Machine Source Group consists of several emission units that comprise the #4 Paper Machine. Specifically, the #4 Paper Machine Source Group includes the following emission units:

- Beloit Soft-Nip Calendar Roll
- Soloronics Infrared Dryers
- Spooner Air Flootation Dryers
- Trimvac Trim Conveying System

The #4 Soft-Nip Calendar Roll consists of two American Hydrotherm burners, each firing #2 fuel oil or propane at a maximum heat input of 7 MMBtu/hr.

The Infrared Dryers consist of two Solaronics burners, each firing propane at 4.8 MMBtu/hr.

The Air Flootation Dryers consist of two Maxxon dryers, each firing propane at 4 MMBtu/hr.

Emissions from the Trimvac Paper Trim Collection Vacuum System vent to a wet cyclone separator.

Based on the use of the specified fuel types and the control of particulate emissions from the Trim Conveying System with the wet cyclone separator, the Department finds that the above named emissions units are meeting BPT.

Streamlining

#4 Calendar Roll

1. Opacity

- . MEDEP Chapter 101, Section 2(B)(3)(d) contains an applicable opacity standard of 20% on a 6-minute block average, except for no more than one 6-minute block average in a 1-hour period.
- . BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes an applicable opacity standard of 10% while firing propane and 20% for no more than 5 minutes in any continuous 1-hour period when firing #2 fuel oil.

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IP accepts streamlining for the opacity standard. The BACT limit is the most stringent; therefore it is the only opacity standard included in this license.

1. PM

- . BACT, determined in License A-203-71-AC-A, issued October 15, 1996, establishes the only applicable PM lb/MMBtu emission limit of 0.12 lb/MMBtu. **No streamlining requested.**
- . BACT, determined in License A-203-71-AA-A and amended in License A-203-71-AC-A, issued October 15, 1996, establishes the only applicable PM lb/hr emission limit of 1.7 lb/hr. **No streamlining requested.**

1. PM₁₀

BACT, determined in License A-203-71-AA-A and amended in License A-203-71-AC-A, issued October 15, 1996, establishes the only applicable PM₁₀ lb/hr emission limit of 1.4 lb/hr. **No streamlining requested.**

1. SO₂

BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable SO₂ lb/hr emission limit of 4.2 lb/hr. **No streamlining requested.**

1. NO_x

BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable NO_x lb/hr emission limit of 4.2 lb/hr. **No streamlining requested.**

1. CO

BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable CO lb/hr emission limit of 4.2 lb/hr. **No streamlining requested.**

1. VOC
BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable VOC lb/hr emission limit of 1.4 lb/hr. **No streamlining requested.**

- #4 Infrared Dryers
 1. Opacity
 - . MEDEP Chapter 101, Section 2(B)(3)(d) contains an applicable opacity standard of 20% on a 6-minute block average, except for no more than one 6-minute block average in a 1-hour period.
 - . BACT, determined in License A-203-71-AA-A issued June 27, 1996, establishes an applicable opacity standard of 10%.

IP accepts streamlining for the opacity standard. The BACT limit is the most stringent; therefore it is the only opacity standard included in this license.

1. PM
 - . BACT, determined in License A-203-71-AA-A and amended in License A-203-71-AC-A, issued October 15, 1996, establishes the only applicable PM lb/MMBtu emission limit of 0.05 lb/MMBtu. **No streamlining requested.**
 - . BACT, determined in License A-203-71-AC-A, issued October 15, 1996, establishes the only applicable PM lb/hr emission limit of 0.5 lb/hr. **No streamlining requested.**

1. PM₁₀
BACT, determined in License A-203-71-AA-A and amended in License A-203-71-AC-A, issued October 15, 1996, establishes the only applicable PM₁₀ lb/hr emission limit of 0.5 lb/hr. **No streamlining requested.**

1. SO₂
BACT, determined in License A-203-71-AA-A and amended in License A-203-71-AC-A, issued October 15, 1996, establishes the only applicable SO₂ lb/hr emission limit of 0.1 lb/hr. **No streamlining requested.**

1. NO_x
BACT, determined in License A-203-71-AA-A and amended in License A-203-71-AC-A, issued October 15, 1996, establishes the only applicable NO_x lb/hr emission limit of 2.4 lb/hr. **No streamlining requested.**

1. CO
BACT, determined in License A-203-71-AA-A and amended in License A-203-71-AC-A, issued October 15, 1996, establishes the only applicable CO lb/hr emission limit of 3.8 lb/hr. **No streamlining requested.**
 1. VOC
BACT, determined in License A-203-71-AA-A and amended in License A-203-71-AC-A, issued October 15, 1996, establishes the only applicable VOC lb/hr emission limit of 1.0 lb/hr. **No streamlining requested.**
- #4 Flootation Dryer
1. Opacity
 - . MEDEP Chapter 101, Section 2(B)(3)(d) contains an applicable opacity standard of 20% on a 6-minute block average, except for no more than one 6-minute block average in a 1-hour period.
 - . BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes an applicable opacity standard of 10%.
- IP accepts streamlining for the opacity standard. The BACT limit is the most stringent; therefore it is the only opacity standard included in this license.
1. PM
 - . BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable PM lb/MMBtu emission limit of 0.05 lb/MMBtu. **No streamlining requested.**
 - . BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable PM lb/hr emission limit of 0.4 lb/hr. **No streamlining requested.**
 1. PM₁₀
BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable PM₁₀ lb/hr emission limit of 0.4 lb/hr. **No streamlining requested.**
 1. SO₂
BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable SO₂ lb/hr emission limit of 0.1 lb/hr. **No streamlining requested.**
 1. NO_x
BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable NO_x lb/hr emission limit of 2.0 lb/hr. **No streamlining requested.**

1. CO
BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable CO lb/hr emission limit of 3.2 lb/hr. **No streamlining requested.**

1. VOC
BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable VOC lb/hr emission limit of 0.8 lb/hr. **No streamlining requested.**

- #4 Trimvac Trim Conveying System
 1. Opacity
 - . MEDEP Chapter 101, Section 2(B)(3)(d) contains an applicable opacity standard of 20% on a 6-minute block average, except for no more than one 6-minute block average in a 1-hour period.
 - . BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes an applicable opacity standard of 5%.

IP accepts streamlining for the opacity standard. The BACT limit is the most stringent; therefore it is the only opacity standard included in this license.

 1. PM
BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable PM lb/hr emission limit of 2.0 lb/hr. **No streamlining requested.**

 1. PM₁₀
BACT, determined in License A-203-71-AA-A, issued June 27, 1996, establishes the only applicable PM₁₀ lb/hr emission limit of 1.0 lb/hr. **No streamlining requested**

Periodic Monitoring

Periodic Monitoring shall consist of record keeping which demonstrates fuel use for the #4 Paper Machine Calendar Roll, Infrared Dryer and Floatation Dryer.

Parameter Monitors

There are no Parameter Monitors required for the #4 Paper Machine Source Group.

CEMS and COMS

There are no CEMS or COMS required to be operated for the #4 Paper Machine Source Group.

Control Equipment

Control equipment for the #4 Paper Machine Source Group consists of a wet cyclone to control emissions from the #4 Trimvac Trim Conveying System.

B. Temporary Units Source Group

IP is licensed to bring on-site and to operate a variety of temporary equipment, including, but not limited to, the following:

- Electrical Generating Stationary Internal Combustion Engines (Electrical Generating SICES)
- Air Compressors
- Wood Tub Grinders

These units shall be leased and are not intended as permanent installations. The exact size of each unit will vary upon delivery. The temporary emission units shall be licensed to operate in addition to currently licensed emission sources.

Visible emissions from the Temporary Units Source Group are regulated by MEDEP Chapter 101.

Total combined heat input from the temporary equipment shall not exceed 50 MMBtu/hr every day, and 30,600 MMBtu/yr. To document compliance with this condition, IP shall record in a log the total daily heat input capacities from all of the temporary equipment that has been operated during any one day and the total MMBtu that have been consumed to date for the current year for each temporary Electrical Generating SICE, Air Compressor, and Wood Tub Grinder that is operated for each day, and make the log available to the Department upon request. Compliance with these requirements represents BACT for the Temporary Units Source Group as originally determined in Amendment A-203-71-Y-A.

Streamlining

Opacity

BACT, determined in License A-203-71-Y-A, issued August 13, 1996, establishes the only applicable opacity requirement of 30%, except for 15 minutes in any 3-hour period. **No streamlining requested.**

Periodic Monitoring

Periodic Monitoring shall consist of record keeping which includes the total daily heat input capacities from all of the temporary equipment that has been operated during any one day and the total MMBtu that have been consumed to date for the current year for each temporary Electrical Generating SICE, Air Compression, and Wood Tub Grinder that is operated for each day. Records shall also include fuel receipts showing the sulfur content of the fuel fired in each temporary unit,

the type of fuel fired, date and time the unit operates, the unit's location at the mill and the quantity of fuel input to each unit.

Parameter Monitors

There are no Parameter Monitors required for the Temporary Units Source Group.

CEMS and COMS

There are no CEMS or COMS required to be operated for the Temporary Units Source Group.

Control Equipment

There is no control equipment operated for the Temporary Units Source Group.

P. Water Treatment Main Furnace

The Water Treatment Main Furnace fires 0.3% sulfur #2 fuel oil at a maximum design capacity of 3.1 MMBtu/hr, and as such is not subject to NSPS Subpart Dc. The furnace is used intermittently as needed for heating purposes. Boiler feedwater is drawn from the Androscoggin River, filtered, and treated to remove ions.

Streamlining

1. Opacity

- a. MEDEP Chapter 101, Section 2(B)(1)(b) contains an applicable opacity standard of 20% on a 6-minute block average basis, except for no more than one 6-minute block average in a 3-hour period.
- b. BACT, determined in License A-203-71-E-R, issued September 3, 1996, establishes an applicable opacity standard of 30% opacity for no more than 5 minutes in any 1-hour period.

IP accepts streamlining for the opacity standard. The Chapter 101 limit is more stringent; therefore it is the only opacity standard included in this license.

2. PM

- a. MEDEP Chapter 103, Section 2(B)(1)(a) contains the only applicable PM lb/MMBtu emission limit of 0.12 lb/MMBtu. **No streamlining requested.**
- b. BACT establishes the only applicable PM lb/hr emission standard of 0.4 lb/hr. **No streamlining requested.**

3. PM₁₀

BACT establishes the only applicable PM₁₀ lb/hr emission standard of 0.4 lb/hr. **No streamlining requested.**

4. SO₂
 - a. MEDEP Chapter 106, Section 2(A)(2) contains an applicable fossil fuel sulfur content standard of 2.0%.
 - . BACT, determined in License A-203-71-E-R, issued September 3, 1996, establishes an applicable SO₂ fossil fuel sulfur content standard of 0.3%.

IP accepts streamlining for the SO₂ fossil fuel sulfur content standard. The BACT limit is the most stringent; therefore it is the only opacity standard included in this license.

- . BACT establishes the only applicable SO₂ lb/hr emission limit of 0.94 lb/hr. **No streamlining requested.**
0. NO_x

BACT establishes the only applicable NO_x lb/hr emission limit of 0.93 lb/hr. **No streamlining requested.**
0. CO
BACT establishes the only applicable CO lb/hr emission limit of 0.11 lb/hr. **No streamlining requested.**
0. VOC
BACT establishes the only applicable VOC lb/hr emission limit of 0.01 lb/hr. **No streamlining requested.**

Periodic Monitoring

Periodic monitoring for the Water Treatment Main Furnace shall consist of record keeping which demonstrates fuel use and fuel receipts indicating the percent sulfur by weight of the fuel oil.

Parameter Monitors

There are no Parameter Monitors required for the Water Treatment Main Furnace.

CEMS and COMS

There are no CEMS or COMS required to be operated for the Water Treatment Main Furnace.

Control Equipment

There is no control equipment operated for the Water Treatment Main Furnace.

B. Wastewater Treatment Plant Source Group

The Wastewater Treatment Plant Source Group consists of emission sources in the wastewater treatment plant process. Specifically, the Wastewater Treatment

Plant Source Group consists of the following emission sources:

- Primary Clarifiers (2)
- Wet Well
- Aeration Lagoon
- Secondary Clarifiers (2)

The wastewater system receives wastewater from various process streams at the mill. Wastewater treatment at the mill consists of clarification in two primary clarifiers, biological treatment in an aeration lagoon, and final clarification before the water is returned to the river.

VOC RACT for IP's Wastewater Treatment Plant Source Group is maintaining its National Pollution Discharge Elimination System discharge permit or Maine PDES license.

The Aeration Lagoon is the only source within the wastewater treatment plant source group subject to the requirements of 40 CFR Part 63, Subpart S and the general provisions of Subpart A.

Periodic Monitoring

IP shall obtain quarterly samples at the inlet and outlet of each biological treatment unit to perform percent HAP reduction testing as described in 40 CFR Part 63, Subpart S.

Periodic Monitoring shall also consist of the following:

Parameter	Record
Inlet soluble COD	Daily
Inlet flow	Daily
Aerator Horsepower	Daily

Parameter Monitors

There are no Parameter Monitors required for the Wastewater Treatment Plant Source Group.

CEMS and COMS

There are no CEMS and COMS required for the Wastewater Treatment Plant Source Group.

Control Equipment

There is no control equipment operated for the Wastewater Treatment Plant Source Group.

B. Landfill

The initial phases of the landfill were constructed in 1976. Currently, the landfill's footprint is approximately 50 acres, and it is 80 to 90 feet thick at its highest point. The landfill is used for disposal of a variety of mill-generated solid waste, including Wastewater Treatment Plant sludge, caustic wastes, refuse, minor quantities of ash, knots and screenings, and woodyard wastes. The landfill emits fugitive methane and a small amount of non-methane VOC. IP monitors the composition of landfill gases pursuant to its DEP solid waste license #S-006247-WD-N-R. VOC RACT for the landfill is the continued periodic sampling and analysis as required by the solid waste license. Asbestos has been disposed of in the landfill in the past. The areas of the landfill containing asbestos waste are regulated by 40 CFR Part 61, Subpart M: "National Emission Standard for Asbestos".

B. Printing Press Room

The QC Printing Presses are used to test the printability of papers produced at the mill. The printing presses are not used for production purposes.

Periodic Monitoring

Periodic Monitoring of the Printing Press Room shall consist of record keeping to demonstrate the VOC composition of VOC containing material used in conjunction with the QC Printing Presses.

B. Bulk Handling Systems Source Group

The Bulk Handling Systems Source Group consists of emission sources used in the storage and handling of bulk process elements. Specifically, the Bulk Handling Systems Source Group consists of the following emission sources:

- Recast lime pneumatic unloading system that consists of "A" and "B" silos
- Starch pneumatic unloading systems that consist of two silos in Additives (North and South) and two silos in Coating Prep (#1 and #2)
- Wastewater Treatment pneumatic lime unloading system that consists of one lime silo (currently not in use)
- Saltcake pneumatic unloading system that consists of one saltcake silo

Bulk deliveries of lime are unloaded into two 100 ton lime silos ("A" and "B"). These silos are vented to a baghouse during bulk lime unloading. The bucket elevator is vented to a fugitive emissions wet scrubber.

Starch is unloaded into the Additives Building Starch Silos through a system consisting of a ground level feeder and two 100 ton silos (North and South) controlled by one common baghouse.

Starch for use as a paper coating is unloaded into the #1 and #2 Starch Silos in coating prep. The feeder and each of the Starch Silos are equipped with baghouses.

Bulk deliveries of lime for use in wastewater treatment are unloaded into a single 105 ton Wastewater Treatment Plant Lime Silo controlled by a baghouse.

Deliveries of saltcake (Na_2SO_4) are unloaded into a single silo with a baghouse on top. The system is vented to a cleanout pit and is equipped with a leak detector.

IP received approval to replace the #3 starch silo in Amendment A-203-71-BD-M to their Chapter 115 license, issued April 1, 2004.

Streamlining

Opacity

MEDEP Chapter 101, Section 2(B)(3)(c) contains the only applicable opacity standard for baghouses 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 inspection of all unloading systems for leaks and malfunctions before unloading bulk process elements into any of the silos that comprise the Bulk Handling Systems Source Group and maintenance logs recording the date and location of all baghouse bag failures as well as routine maintenance on the baghouses.

Control Equipment

Control equipment for the Bulk handling Systems Source Group consists of baghouses on the bulk storage silos.

B. Condensates Source Group

The Condensates Source Group consists of condensate streams collected to meet the requirements of 40 CFR Part 63, NESHAPs from the Pulp and Paper Industry. Specifically, the Condensates Source Group consists of the following condensate streams:

- Digester Flash Steam condensates
- Evaporator condensates
- Pre-Evaporator condensates

These condensate streams were selected by IP to meet the requirements of 40 CFR Part 63, §63.446(c)(3), which specifies that condensates be collected from the digesters, evaporators, HVLC and LVHC collection systems that in total contain a total HAP mass of 11.1 pounds per ton of oven dried pulp (ODP), and 10.2 lb/ton ODP is destroyed in the wastewater treatment plant.

B. Parts Washer Source Group

IP operates a number of parts washers from which small quantities of VOCs are emitted. The total quantity of VOCs emitted from each parts washer is assumed to be less than 1 ton/year, therefore the parts washers are considered insignificant as defined in MEDEP Chapter 140, Appendix B(B)(1). Although the parts washers are considered insignificant based on the amount of VOCs 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 records of solvent added and removed.

B. Propane Flares

The Propane Flares are used to purge the propane system, which includes the #3 and #4 SoftNip rollers propane tank and the RTO's propane tank.

II. FACILITY EMISSIONS

Total Allowable Annual Emissions for the Facility
(used to calculate the license fee)

Pollutant	Tons/Year
PM	2195.4
PM ₁₀	2176.65
SO ₂	15075.6
NO _x	4487.3
CO	9594.9
VOC	1181.3
Cl ₂	13.1
ClO ₂	13.1

The emissions listed above are based on the following emission rates per unit:

Emission Unit	PM (ton/year)	PM₁₀ (ton/year)	SO₂ (ton/year)	NO_x (ton/year)	CO (ton/year)	VOC (ton/year)
Power Boilers	1016.2	1016.2	9608.8	2271.1	167.8	50.8
WFI	210.2	210.2	1681.9	841.0	5256.0	614.1
Recovery Boilers	583.9	583.9	3532.9	934.3	1167.7	97.7
Smelt Tank #1	60.0	60.0	11.8	--	--	--
Smelt Tank #2	51.2	49.1	17.1	--	--	--
#1 Lime Kiln	111.7	111.7	74.6	145.9	1459.9	6.1
#2 Lime Kiln	109.5	109.5		145.9	1459.9	6.1
RTO	4.4	4.4	8.8	7.49	5.3	13.1
Grinders	--	--	--	--	--	374.6
Flash Dryer	21.3	10.95	111.2	51.5	13.1	2.6
#3 PM– IR Dryer	3.0	3.0	0.2	8.8	9.6	0.6
#4PM – IR Dryer	2.1	2.1	0.4	10.5	16.6	4.4
#4 PM – Floataction Dryer	1.8	1.8	0.4	8.8	14.0	3.5
#4 PM – Calendaring Roll	7.4	6.1	18.5	18.4	18.4	6.1
#4 PM Trim Conveyor Sys.	8.8	4.4	--	--	--	--
Temporary Units	1.8	1.8	4.7	39.8	6.1	1.5
Water Treatment Furnace	1.6	1.6	4.1	4.1	0.5	0.02

Calculation of the above ton/year emission rates was determined assuming constant operation of each emission unit at maximum capacity, unless the unit is limited by the license to a less than maximum firing rate or hours of operation. In each case that limits were imposed, the combination of operating conditions that would produce the greatest emissions was considered. Previously licensed emission limits were used in every feasible situation. SO₂ emissions were computed using a mass balance calculation whenever possible.

IV. AIR QUALITY ANALYSIS

IP 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. This analysis was done as part of a Chapter 115 renewal permit (A-203-71-E-R) in 1996. An additional ambient air quality analysis is not required for this Initial Part 70 License.

ORDER

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

- 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-203-70-A-I 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 IP 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**.

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;
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.

- (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;
- (0) 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.
- (0) 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:
 - () 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,
 - () 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 24, 1996.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
A.	Facility	Chapter 107	Sulfur Dioxide Emission Standards for Sulfite Pulp Mills	Facility is not a sulfite pulp mill
B.	Petroleum Tanks	Chapter 111	Petroleum Liquid Storage Vapor Control	All petroleum tanks at the facility greater than 39,000 gallons in volume have true vapor pressures < 1.0 psia.
C.	Paper Mill	Chapter 129	Surface Coating	IP does not operate facilities

			Facilities	subject to this Chapter.
D.	Printing Presses	Chapter 132	Graphic Arts – Rotogravure and Flexography	Chapter 132 does not apply to the QC Printing Presses.
E.	Paper Mill	40 CFR 63 Subpart HHHHH	Coating Manufacturing MACT	On-machine coating is considered substrate formation, not coating, and is therefore not subject to this rule.
F.	Paper Mill	40 CFR 63 Subpart JJJJ	Paper and Other Web Coating MACT	On-machine coating is considered substrate formation, not coating, and is therefore not subject to this rule.
G.	Groundwood Mill	40 CFR Part 63	MACT Standards	Mechanical pulping is exempt from Subpart S, and not subject to any other MACT.

- (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.

- (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.

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;
- (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;
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;
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;
- (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.

- (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:
 - (i) 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;
 - (ii) to demonstrate compliance with the applicable emission standards; or,
 - (iii) 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.

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.

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 in emission standards 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.
- (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.

- (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.
- (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;

SPECIAL CONDITIONS

- (14) Power Boilers #1 and #2
 - (A) IP is licensed to fire #6 and #2 fuel oil and used oil in each Power Boiler #1 and #2. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
 - (B) IP shall keep records of the sulfur content for all fuel oil fired in Power Boilers #1 and #2. [MEDEP Chapter 140, BPT]
 - (C) Power Boiler #1 shall not exceed a heat input rate of 680 MMBtu/hr on a 3 hour block average basis demonstrated by the fuel oil firing rates. [MEDEP Chapter 140]
 - (D) Power Boiler #2 shall not exceed a heat input rate of 680 MMBtu/hr on a 3 hour block average basis demonstrated by the fuel oil firing rates. [MEDEP Chapter 140]
 - (E) Total combined heat input to Power Boilers #1 and #2 shall not exceed 1160 MMBtu/hr on a 3 hour block average basis, demonstrated by the sum of the fuel oil firing rates for Power Boilers #1 and #2. [MEDEP Chapter 140]

- (F) Emissions from Power Boiler #1 and #2 shall not exceed the following limits:

Pollutant	lb/MMBtu - each boiler	Ave Time	lb/hour - total boilers	Ave Time
PM	0.2		232.0	
PM ₁₀	0.2		232.0	
SO ₂	--		2193.8	
NO _x	0.447	24-hr block	518.5	24-hr block
CO	--		38.3	
VOC	--		11.6	

[MEDEP Chapter 140, BPT]

Compliance with the lb/hr emission limits shall be demonstrated by stack testing in accordance with the appropriate method from 40 CFR Part 60, on the request of the Department.

- () The sulfur content of the fuel oil fired in Power Boiler #1 and #2 shall not exceed 1.8% by weight demonstrated by purchase records from the supplier within the accuracy of the test methods used. [MEDEP Chapter 140, BPT]
- () When COMS located on the breaching of each Power Boiler #1 and #2 to the combined stack are used to measure opacity, visible emissions from each of Power Boilers #1 and #2 shall not exceed an opacity of 30% on a 6-minute block average basis, except for no more than two 6-minute block averages in a 3-hour period. [MEDEP Chapter 101]
- () When COMS located in the main stack of Power Boilers #1 and #2 are used to measure combined opacity, visible emissions from Power Boilers #1 and #2 shall not exceed an opacity of 30% recorded as 6-minute block averages, except for no more than three 6-minute block averages in a 3-hour block period. [MEDEP Chapter 101]
- () Compliance with the lb/MMBtu particulate matter limits shall be demonstrated by stack testing in accordance with 40 CFR Part 60, Appendix A, Method 5 by December 31, 2004 and every two calendar years thereafter [MEDEP Chapter 140, BPT]
- () Compliance with the NO_x lb/MMBtu emission limit shall be on a 24-hour block average basis, demonstrated by means of a NO_x CEMS, certified for lb/MMBtu on the breaching of each Power Boiler #1 and #2. [MEDEP Chapter 138, NO_x RACT and MEDEP Chapter 140, BPT]

- (L) NO_x RACT
The Department finds the following to be NO_x RACT for Power Boilers #1 and #2:
- (i) A NO_x emission limit of 0.447 lb/MMBtu on a 24-hour block average basis (midnight to midnight);
 - (ii) Operation of NO_x CEMS to meet the requirements of Chapter 117 on the breaching of each Power Boiler #1 and #2 to the common stack; and
 - (iii) Operation of low NO_x burners in each Power Boiler #1 and #2.
[MEDEP Chapter 138, NO_x RACT]

- (M) The fuel oil fired into each Power Boilers #1 and #2 shall be monitored by fuel flow monitors operated in accordance with the manufacturers' specifications. [MEDEP Chapter 140]

- (N) International Paper shall monitor and record the following as specified, for each of Power Boilers #1 and #2:

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

[MEDEP Chapter 140]

- (15) Waste Fuel Incinerator (WFI)
- (A) The WFI is licensed to fire a combination of fuels including biomass and oil. Biomass shall include sludge, wood waste (including bark, knots and screenings, etc.), cotton residue, sawdust absorbed with oil, and waste papers. Oil shall include #6 fuel oil, specification used oil, off-specification used oil, oily rags and oil soaked absorbent pigs, etc. The sulfur content shall be recorded and documented by purchase records from the supplier or by test results performed on a representative sample of onsite generated specification or off-specification used oil, both within the accuracy of the test methods used. [MEDEP Chapter 140]
- (B) The WFI shall not exceed a total heat input rate of 480 MMBtu/hr on a 24 hour block average basis demonstrated by a steam production limit of 317,000 lb/hr at 900 psig on a daily average. [MEDEP Chapter 140]
- (C) The WFI shall not exceed a heat input rate of 240 MMBtu/hr from the firing of #6 fuel oil. This limit shall be demonstrated by:
- (i) Maintaining the size of the fuel oil supply pipeline between the oil heat exchanger outlet and the safety shut-off valve as three-quarter inch pipe over a distance of approximately sixty-three feet,

- distinguished from other piping by clear marking or painting the complete length of the pipe modification;
- (ii) Maintaining a perforated plate or similar device, designed to create a non-recoverable pressure drop, securely in the air supply duct to the top of the oil burner wind box to restrict the combustion air flow to the level required for safe, complete combustion of 1600 gallons/hr of fuel oil, assuming 7% oxygen (over the stoichiometric amount required);
 - (iii) Maintaining the computer software controlling the fuel oil flow rate, temperature and viscosity to limit the amount of fuel oil going to the WFI to the equivalent of 240 MMBtu/hr; and
 - (iv) Continuously monitoring and recording the rate (in gallons per minute) at which oil is fed to the WFI.

[MEDEP Chapter 140, BPT]

- (D) The WFI shall not exceed the following emissions limits:

Pollutant	lb/MMBtu	Ave Time	lb/hour	Ave Time
PM	0.10		48.0	
PM ₁₀	--		48.0	
SO ₂	0.80	3-hr rolling	384.0	3-hr rolling
NOx	0.40	24-hr block	192.0	24-hr block
CO	--		1200.0	
VOC	--		140.2	

[MEDEP Chapter 140, BPT]

Compliance with the lb/hr emission limits shall be demonstrated by stack testing in accordance with the appropriate method from 40 CFR Part 60, on the request of the Department.

- (E) The wet scrubber shall operate at all times the WFI is in operation in accordance with Condition (5) of the Standard Conditions. [MEDEP Chapter 140, BPT]
- (F) Visible emissions from the WFI 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 period. [MEDEP Chapter 140, BPT]
- (G) Compliance with the particulate matter limits shall be demonstrated by stack testing performed once every two calendar years in accordance with 40 CFR Part 60, Appendix A, Method 5. [MEDEP Chapter 140, BPT]

- (H) Compliance with the SO₂ lb/MMBtu emission limit shall be on a three hour rolling average basis, demonstrated by means of a continuous monitoring device for continuously monitoring and recording sulfur dioxide lb/MMBtu emissions and associate O₂ stack diluent gas emissions. [MEDEP Chapter 106 and MEDEP Chapter 140, BPT]
- (I) Compliance with the NO_x lb/MMBtu emission limit shall be on a twenty-four hour block average basis, demonstrated by means of a NO_x CEMS, certified for lb/MMBtu. [MEDEP Chapter 138 and MEDEP Chapter 140, BPT]
- (A) NO_x RACT
The Department finds the following to be NO_x RACT for the WFI:
A NO_x emission limit of 0.40 lb/MMBtu on a 24-hour block average basis (midnight to midnight) [MEDEP Chapter 138, NO_x RACT]
- (A) Until the CMS for Subpart DDDDD is installed and operated, and data verified pursuant to 40 CFR Part 63.8(c)(3), International Paper shall monitor and record the following for the WFI, in the units specified if applicable:

Item to be monitored	Record
Flue gas pressure drop	Continuously
Scrubbing fluid flow rate (gal/min)	Continuously
Scrubbing fluid pressure from the wet scrubber (psig)	Continuously
Fuel oil flow rate (gal/min)	Continuously
Total biomass (tons per hour)	Continuously
Total steam production	Continuously
Scrubbing fluid media solids	Once every 24 hours

[MEDEP Chapter 140, BPT]

- (A) IP shall keep copies of all reports generated, and of all data used to generate the reports, for the WFI that are sent to the Department or the EPA. These records shall be kept for at least six years. [MEDEP Chapter 140, BPT]
- (16) Recovery Boiler Source Group
- (A) Recovery Boiler #1 shall not exceed a maximum firing rate of 2.50 MMlb dry BLS/day, on a 24 hour block average basis demonstrated by the black liquor firing rates. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

- (B) Recovery Boiler #2 shall not exceed a maximum firing rate of 3.44 MMlb dry BLS/day, on a 24 hour block average basis demonstrated by the black liquor firing rates. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
- (C) (i) The sulfur content of the fuel oil, including specification and off-specification used oil, fired in Recovery Boilers #1 and #2 shall not exceed 0.5% by weight. [MEDEP Chapter 140, Ambient Air Quality Modeling] **Enforceable by State-only**
- (ii) The sulfur content of the fuel oil, including specification and off-specification used oil, fired in Recovery Boilers #1 and #2 shall not exceed 2.0% by weight. [MEDEP Chapter 106]
- (iii) The sulfur content shall be demonstrated by purchase records from the supplier or by test results performed on a representative sample of onsite generated specification or off-specification used oil, both within the accuracy of the test methods used. [MEDEP Chapter 140, BPT]
- (D) Emissions from Recovery Boilers #1 and #2 shall not exceed the following limits:

Pollutant	gr/dscf -each boiler	Ppmv - each boiler	Ave Time	lb/hour - total boilers	Ave Time
PM	0.044 @ 8% O ₂	--		133.3	
PM ₁₀	--	--		133.3	
SO ₂	--	180 ^a	30-day rolling	806.6	3-hr block
NOx	--	206	24-hr block	213.3	24-hr block
CO	--	--		266.6	
VOC	--	--		22.3	
TRS	--	5	12-hr block	--	

[MEDEP Chapter 140, BPT]

^aSee (J) below.

Compliance with the lb/hr emission limits shall be demonstrated by stack testing in accordance with the appropriate method from 40 CFR Part 60, on the request of the Department.

- (E) TRS is limited to 5 ppmv corrected to 8% O₂ on a dry basis, for each Recovery Boiler #1 and #2, measured as H₂S. Compliance with the TRS ppmv emission limits shall be determined on a 12-hour block average basis, as described in 40 CFR Part 60, Subpart BB and demonstrated by means of a TRS CEMS on the breaching of each Recovery Boiler #1 and #2, to the combined stack. The first two 12-hour block averages in a

quarter which exceed the TRS license limit above shall not be considered a violation of Chapter 124. [MEDEP Chapter 124]

- (F) Until particulate limits are established for affected sources under 40 CFR 63, Subpart MM, Recovery Boilers #1 and #2 shall each not exceed 4.0 pounds of particulate per air dried ton of pulp (ADTP) for a two (2) hour sampling period. [MEDEP Chapter 105]
- (G) After establishment by performance tests in accordance with 40 CFR 63, Subpart MM, Recovery Boilers #1 and #2 shall each not exceed the particulate limit established pursuant to 40 CFR 63, Subpart MM.
- (H) Compliance with the lb/hr particulate matter limit shall be demonstrated by stack testing performed once every two years in accordance with 40 CFR Part 60, Appendix A, Method 5. [MEDEP Chapter 140, BPT]
- (I) SO₂ is limited to 180 ppmv corrected to 8% O₂ on a dry basis for each Recovery Boiler #1 and #2. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
- ^a(J) When Recovery Boiler #1 or #2 is firing only fuel oil, the monitored SO₂ ppmv emissions during that period shall not be included in determining the 30-day rolling average SO₂ ppmv emission rate, for that boiler firing oil. [MEDEP Chapter 140, BPT]
- (A) Compliance with the SO₂ ppmv emission limits shall be on a 30-day rolling average basis, demonstrated by means of an SO₂ CEMS on the breaching of each Recovery Boiler #1 and #2 to the combined stack. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
- (B) NO_x RACT
The Department finds the following to be NO_x RACT for Recovery Boilers #1 and #2:
 - (i) A NO_x emission limit of 206 ppmv per boiler corrected to 8% O₂ or 12% CO₂ on a dry basis;
 - (ii) Operation of NO_x CEMS to meet the requirements of Chapter 117 on the breaching of each Recovery Boiler #1 and #2 to the common stack; and
 - (iii) Compliance with the NO_x CEMS monitored NO_x ppmv emission limit determined on a 24 hour block average basis (midnight to midnight).[MEDEP Chapter 138, NO_x RACT]

- (C) Visible emissions from Recovery Boilers #1 and #2 shall not exceed 30% opacity recorded as 6-minute block averages, except for no more than three 6-minute block averages in a 3-hour period. [MEDEP Chapter 101]
- (J) IP shall take corrective action as specified in the startup, shutdown and malfunction plan when the average of ten consecutive 6-minute opacity averages results in a measurement greater than 20% opacity. [40 CFR Part 63, Subpart MM]
- (J) IP shall operate for Recovery Boilers #1 and #2, at a minimum, the number of Electrostatic Precipitator fields that operated during IP's most recent demonstration of compliance with its licensed particulate emission limits. Upon written notification to the Department, and in accordance with the Bureau of Air Quality's Air Emission Compliance Test Protocol, IP may perform additional particulate emission testing to demonstrate compliance with alternative operating scenarios, but under no circumstances shall IP be relieved of its obligation to meet its licensed emission limits. [MEDEP Chapter 140, BPT]
- (J) IP shall operate the Electrostatic Precipitator (ESP) on the emissions from the Recovery Boiler #1 and #2 in accordance with Condition (5) of the Standard Conditions. The ESP need not operate when the Recovery Boilers are firing only oil, however IP shall not be relieved of its obligation to meet its licensed opacity limits. [MEDEP Chapter 140, BPT]
- (J) IP shall comply with the record keeping and reporting requirements of 40 CFR Part 63, Subpart MM and the general provisions of Subpart A for each Recovery Boiler #1 and #2 by March 15, 2005. [40 CFR Part 63, Subpart MM]
- (J) The fuel oil and black liquor fired into each Recovery Boiler #1 and #2 shall be monitored by a fuel flow monitor operated in accordance with the manufacturer's specifications. [MEDEP Chapter 140]
- (J) Until the CMS for Subpart MM is installed and operating, IP shall monitor and record the following for each Recovery Boiler #1 and #2:

Item to be monitored	Record
Fuel oil firing rate	Continuously
Black liquor firing rate	Continuously
Black liquor solids	Once every 24 hours

[MEDEP Chapter 140]

(17) #1 and #2 Smelt Dissolving Tank

(A) The #1 Smelt Tank shall not exceed the following emission limits:

Pollutant	lb/ton BLS	lb/hour
PM	--	13.7
PM ₁₀	--	13.7
SO ₂	--	2.7
TRS	0.033	--

[MEDEP Chapter 140, BPT]

(B) The #2 Smelt Tank shall not exceed the following emission limits:

	lb/ton BLS	lb/hour
PM	--	11.7
PM ₁₀	--	11.2
SO ₂	--	3.9
TRS	0.033	--

[MEDEP Chapter 140, BPT]

(C) TRS shall be measured as H₂S. [MEDEP Chapter 124]

(D) Until particulate matter limits are established for affected sources under 40 CFR 63, Subpart MM., 2005 the #1 and #2 Smelt Dissolving Tanks shall each not exceed 0.5 pounds of particulate per air-dried ton of pulp for a 2-hour sampling period. [MEDEP Chapter 105]

(E) After establishment by performance tests in accordance with 40 CFR 63, Subpart MM, the #1 and #2 Smelt Dissolving Tanks shall each not exceed the particulate limit established pursuant to 40 CFR 63, Subpart MM.

(F) Visible emissions from each of the #1 and #2 Smelt Dissolving Tanks shall not exceed 20% opacity on a 6-minute block average basis, except for no more than on 6-minute block average in a 1-hour period. [MEDEP Chapter 101]

(G) IP shall operate the wet cyclonic scrubber systems on the emissions from the #1 and #2 Smelt Tanks in accordance with Condition (5) of the Standard Conditions. [MEDEP Chapter 140, BPT]

(H) IP shall record all #1 and #2 Smelt Dissolving Tanks' scrubber by-pass incidents greater than 5 minutes within the quarterly report with reasons for each occurrence. [MEDEP Chapter 124]

- (I) IP shall inspect and replace the Smelt Dissolving Tanks' scrubber nozzles annually. The nozzles shall be inspected no sooner than three months but no later than nine months after the annual outage. Commitment to this inspection schedule meets the SDT Scrubber enhancement requirement that is a condition of IP's compliance extension of Subpart MM. [MEDEP Chapter 140, BPT]
- () Compliance with the PM and TRS lb/ton BLS emission limits shall be demonstrated by stack testing performed once every two calendar years in accordance with 40 CFR Part 60. [MEDEP Chapter 124]
- () Compliance with the SO₂ emission limits shall be demonstrated by stack testing performed as requested by the Department in accordance with 40 CFR Part 60, Appendix A, Method 5. [MEDEP Chapter 140, BPT]
- () VOC RACT
The Department finds the following to be VOC RACT for the #1 and #2 Smelt Tanks:
 - () A TRS emission limit of 0.033 lb/ton BLS as H₂S per smelt tank (0.016 g/kg BLS as H₂S per smelt tank) pursuant to Chapter 124;
 - () Compliance with the TRS lb/ton BLS emission limit demonstrated through stack testing performed once every two calendar years in accordance with 40 CFR Part 60; and[MEDEP Chapter 134, VOC RACT]
- () IP shall comply with the recordkeeping and reporting requirements of 40 CFR Part 63, Subpart MM and the general provisions of Subpart A for each #1 and #2 Smelt Dissolving Tank March 15, 2005. [40 CFR Part 63, Subpart MM]
- () IP shall monitor and record the following for each of the #1 and #2 Smelt Dissolving Tanks. This alternative monitoring fulfils the requirements for the CMS for Subpart MM:

Parameter for each scrubber	Monitor	Record
Scrubber fan amps	Continuously	Continuously
Scrubber media flow rate	Continuously	Continuously

[MEDEP Chapter 140, BPT]

(18) “A” and “B” Lime Kilns

(E) The “A” Lime Kiln shall not exceed the following emission limits:

Pollutant	ppmv	Ave. Time	lb/hour
PM	--		25.5
PM ₁₀	--		25.5
SO ₂	--		6.7 ^{a,b}
NO _x	120		33.3
CO	--		333.3
VOC	--		1.4
TRS	20	12-hr block	--

[MEDEP Chapter 140] ^aSee (I) below ^bSee (J) below

(F) The “B” Lime Kiln shall not exceed the following emission limits:

Pollutant	ppmv	Ave. Time	lb/hour
PM	--		25.0
PM ₁₀	--		25.0
SO ₂	--		6.7 ^{a,b}
NO _x	120		33.3
CO	--		333.3
VOC	--		1.4
TRS	20	12-hr block	--

[MEDEP Chapter 140] ^aSee (I) below ^bSee (J)below

(G) Until particulate matter limits are established for affected sources under 40 CFR 63, Subpart MM, the “A” and “B” Lime Kilns shall each not exceed 0.13 gr/dscf corrected to 10% O₂ of particulate matter. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

(H) After establishment by performance tests in accordance with 40 CFR 63, Subpart MM, the “A” and “B” Lime Kilns shall each not exceed the particulate limit established pursuant to 40 CFR 63, Subpart MM.

(I) Compliance with the particulate matter limit shall be demonstrated by stack testing performed once every two calendar years in accordance with 40 CFR Part 60, Appendix A, Method 5. [MEDEP Chapter 140, BPT]

(J) Visible emissions from each of the “A” and “B” Lime Kilns 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]

- (K) TRS is limited to 20 ppmv corrected to 10% O₂ on a dry basis for each “A” and “B” Lime Kiln, measured as H₂S. Compliance with the TRS ppmv emission limit shall be on a 12 hour block average basis, as described in 40 CFR Part 60, Subpart BB and demonstrated by means of a TRS CEMS on each kiln. The first four 12-hour block averages in a quarter which exceed the TRS limit of this license are not a violation of Chapter 124. [MEDEP Chapter 124]
- (L) NO_x is limited to 120 ppmv corrected to 10% O₂ on a wet basis for each “A” and “B” Lime Kiln. Compliance with the NO_x ppmv emission limit shall be demonstrated by stack tests performed once every two calendar years, in accordance with 40 CFR Part 60, Appendix A. [MEDEP Chapter 138]
- ^a(I) The total combined annual SO₂ emissions from the “A” and “B” Lime Kilns shall not exceed 74.6 tons per year, which includes 3000 hours of SO₂ emissions at 24.0 lb/hr.
- ^b(J) Tertiary Backup System
The tertiary backup system described in this license shall be considered to be in operation when NCGs are being combusted in the kilns in the absence of lime and the lime mud feed to the kilns has stopped without interruption for a period greater than one hour.
- When the tertiary backup system is in operation and the other kiln is not in operation or is unable to accept the NCG gases, then:
- (iii) the SO₂ emissions from that kiln firing NCGs shall not exceed 24.0 lb/hr; [MEDEP Chapter 140, BPT]
- (iv) the NCG Scrubber shall be in operation; [MEDEP Chapter 140, BPT]
- (v) IP shall record in a log the date and length of time, in minutes, when NCGs are combusted within the “A or “B” Lime Kiln without the presence of lime; [MEDEP Chapter 140, BPT]
- (vi) IP shall continuously monitor and record the pH or conductivity of the Lime Kiln scrubbing solution. The recorded data shall be used by the Bureau of Air Quality to assess a range of proper scrubber operation; [MEDEP Chapter 140, BPT]
- (A) The following methods of monitoring and recordkeeping shall be performed. IP shall perform the respective alternate methods of

monitoring and recordkeeping in operation only in the event the primary method becomes non-operational:

[MEDEP Chapter 140]

- (i) primary: the high temperature propane pilots on the kiln;
alternate: the existing burner on the kiln;
 - (ii) primary: the lime silo level indicator;
alternate: a hand strung measurement of the lime silo level once when the lime silo level indicator becomes non-operational and every two hours thereafter;
 - (iii) primary: the front end camera of the kiln;
alternate: visual inspection of the kiln once when the front end camera becomes non-operational and every 15 minutes thereafter;
 - (iv) primary: the variable speed drive on the kiln;
alternate: the variable speed shall be bypassed and the kiln shall operate at maximum speed; and
 - (v) primary: a meter to continuously monitor and record the pH or conductivity of the Lime Kiln scrubbing solution;
alternate: a grab sample analyzed for pH or conductivity of the Lime Kiln scrubbing solution recorded in a log once when both the pH and the conductivity meter become non-operational and every 30 minutes thereafter.
- (B) The combined total hours of which NCG gases are combusted in the “A” and “B” Lime Kilns without the presence of lime within either kiln shall not exceed 3000 hours per calendar year. [MEDEP Chapter 140, BPT]
- (C) IP is licensed to fire fuel oil (including #6 fuel oil, #2 fuel oil, propane, specification used oil and off-specification used oil) in the lime kilns. IP shall maintain records of the amount of fuel oil, including #6 fuel oil, on and off specification used oil, fired in the lime kilns. IP shall maintain records on site to demonstrate the amount (gallons) and the specification used oil classification for each load of specification waste oil received at the mill. [MEDEP Chapter 140, BPT]
- (D) The sulfur content of the fuel oil fired in the “A” and “B” Lime Kilns shall not exceed 1.8% by weight demonstrated by purchase records from the supplier within the accuracy of the test methods used. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

- (E) IP shall operate the Scrubber Systems on the emissions from each of "A" and "B" Lime Kilns in accordance with Condition (5) of the Standard Conditions. [MEDEP Chapter 140, BPT]
- (J) IP shall comply with the standards and the recordkeeping and reporting requirements of 40 CFR Part 63, Subpart MM and the general provisions of Subpart A for each "A" and "B" Lime Kilns March 15, 2005. [40 CFR Part 63, Subpart MM]
- (J) IP shall monitor and record the following for each "A" and "B" Lime Kiln. This alternative monitoring for the "A" Lime Kiln and the monitoring for the "B" Kiln fulfills the requirements for the CMS for Subpart MM:

For the "A" Lime Kiln:

Item to be monitored	Record
High pressure pressure	Once every 8 hours
High pressure flow	Once every 8 hours
Low pressure flow	Once every 8 hours

For the "B" Lime Kiln:

Item to be monitored	Record
Scrubber pressure drop	Once every 8 hours
Scrubbing media flowrate	Once every 8 hours

[MEDEP Chapter 140]

- (0) RTO Source Group
The RTO Source Group is comprised of the RTO System (the collection system, associated fans, wet scrubber and the RTO itself) and several emission units which emit high volume, low concentration (HVLC) gases that are sent to the RTO for destruction. These emission units include the "A" and "B" Chip Bins, "A" Knotters, "A" Brown Stock Washers, "A" #1 and #2 Seal Tanks, the Oxygen Delignification System, the Black Liquor Storage Tanks, #1 and #2 Recovery Boiler Mix Tanks, West Precipitator Mix Tank, East precipitator Mix Tank, East Economizer Mix Tank, 52% Black Liquor Tank and 63% Black Liquor Tank. The RTO was subjected to a BACT determination when it was first licensed in A-203-71-M-A issued on July 31, 1995.
- () The RTO is licensed to fire propane and 0.3% sulfur #2 fuel oil as supplemental fuels. Compliance with the fuel sulfur limit shall be demonstrated through purchase records from the supplier showing the sulfur content of the fuel within the accuracy of the test methods used. [MEDEP Chapter 140, BPT]

- (B) Emissions from the RTO Source Group shall not exceed the following:

Pollutant	lb/hr
PM	1.0
PM ₁₀	1.0
SO ₂	2.02
NO _x	1.71
CO	1.2
VOC	3.0
TRS	0.2

[MEDEP Chapter 140, BPT]

- (C) A continuous monitoring device to measure and record the scrubbing media pH or conductivity and RTO combustion temperature shall be operated on the wet scrubber that serves the RTO System. [MEDEP Chapter 140, BPT]
- (D) IP shall operate the wet scrubber on the emissions from the RTO System in accordance with Condition (5) of the Standard Conditions. [MEDEP Chapter 140, BPT]
- (E) Emissions from the Oxygen Delignification System vents shall be collected and controlled by the RTO System. Emissions from the brown stock washer system shall be collected and controlled by the RTO System to meet the requirements of Chapter 124 and in accordance with the following requirements:
[MEDEP Chapter 124]
- (i) Emissions shall be collected such that VOC and TRS emissions are captured and contained for discharge through a control device (the RTO System);
[MEDEP Chapter 140, BPT]
- (ii) When the MACT and Chapter 124 requirements take effect, the RTO System shall meet, at a minimum, an average of 96% of the individual sources' percent collected time on a quarterly basis. Until such time, the RTO System shall meet a minimum average of 95% of the individual sources' percent collected time on a quarterly basis. This shall be determined by first calculating the individual source's percent collected time, as the time that emissions were collected from a source for control, dividing by that source's operating time, multiplying by 100, and then calculating the average of all the percent collected times; and
[MEDEP Chapter 140, BPT]

(iii) The RTO System shall control the collected emissions and IP shall meet, at a minimum, a 95% RTO System availability on a quarterly basis, based on the amount of time that emissions are sent to the RTO System for control. [MEDEP Chapter 124]

(F) IP shall collect and treat HAP emissions from the knotter or screen systems, pulp washing systems, decker systems and oxygen delignification system to meet the requirements of 40 CFR Part 63 §63.443 by April 17, 2007.

(G) A continuous monitoring device to measure and record the combustion temperature that ensures TRS incineration shall be operated on the RTO System. The monitoring device must be accurate to within \pm one (1)% of the temperature being measured and must achieve 95% uptime based on quarterly incineration time. [MEDEP Chapter 124]

(H) IP shall monitor and record the following for the RTO and the RTO Scrubber:

Item to be monitored	Record
Scrubbing media pH or conductivity	Continuously
RTO Combustion Temperature	Continuously

[MEDEP Chapter 140]

(20) LVHC Source Group

The LVHC Source Group is comprised of emission units in several of the process areas of the mill that emit non-condensable gases (LVHC gases) which are sent to the Lime Kilns for destruction. Specifically, the LVHC Source Group consists of the "A" and "B" Digesters, "A" and "B" Evaporators, #1 and #2 Blow Tank, and the Condensate Collection Tank (CCT).

(A) IP shall collect and incinerate all gases from the emission units that comprise the LVHC Source Group in the #1 or #2 Lime Kiln, in accordance with Chapter 124 and 40 CFR Part 63, Subpart S. Incineration of LVHC gases in the Lime Kilns in the presence of lime mud shall constitute IP's primary strategy for control of TRS. Incineration of LVHC gases in the Lime Kilns without the presence of lime mud shall constitute IP's backup strategy for control of TRS. IP shall employ the backup TRS control strategy no later than 40 minutes after the primary system malfunctions or shuts down. [MEDEP Chapter 124 and 40 CFR Subpart S]

- (B) IP shall not allow venting of TRS from the LVHC system or associated equipment which:
 - (i) exceeds 40 minutes in duration; or
 - (ii) contributes to an aggregate TRS venting of more than 1.0% of quarterly operation time.[MEDEP Chapter 124, TRS Control]
 - (A) IP shall keep records of all ventings from the LVHC system exceeding one minute in duration. [MEDEP Chapter 124, TRS Control]
 - (B) IP shall maintain a written preventative maintenance program for their TRS gas collection system. [MEDEP Chapter 124, TRS Control]
 - (C) The closed collection system shall be operated to meet the requirements of 40 CFR Part 63, §63.450. Visual inspections shall be performed once during each calendar month with at least 21 days elapsed time between inspections, to ensure that all ductwork, piping, enclosures, and enclosure openings show no visible evidence of defects and are maintained in the closed position and sealed. Annual pressure demonstrations at each enclosure opening are also required. [40 CFR Part 63, Subpart S]
 - (A) IP may use hog ejectors to start the “A” and “B” Evaporators. IP shall report the dates and duration the hog ejectors were used in their quarterly report. [MEDEP Chapter 140, BPT]
- (21) Grinders Source Group
The Grinders Source Group is comprised of six grinders and the grinder flume.
- VOC RACT
The Grinders Source Group shall comply with MEDEP Chapter 134. The Department finds VOC RACT for the Grinders Source Group to be no control. [MEDEP Chapter 134]
- (22) Bleach Plant Scrubber Source Group
The Bleach Plant Scrubber Source Group is comprised of emission units in the Bleach Plant and ClO₂ generation system whose emissions are controlled by the Bleach Plant Scrubbers. Specifically, the Bleach Plant Scrubber Source Group includes the “A” and “B” Bleach Plants, the primary ClO₂ Generator, the secondary ClO₂ Recovery Unit and the secondary ClO₂ Absorber.
- (A) Total Cl₂ emissions from the Bleach Plant shall not exceed 3.0 lb/hour, 13.1 TPY. [MEDEP Chapter 122, BPT] **Enforceable by State-only**

- (B) Total ClO₂ emissions from the Bleach Plant shall not exceed 3.0 lb/hour, 13.1 TPY. [MEDEP Chapter 122, BPT] **Enforceable by State-only**
- (C) Compliance with the Cl₂ and ClO₂ lb/hr emission limits shall be demonstrated by testing performed once every year and upon the request of the Department. [MEDEP Chapter 122] **Enforceable by State-only**
- (D) IP shall operate the Scrubbers on the Cl₂ and ClO₂ emissions from the “A” and “B” Bleach Plants in accordance with Condition (5) of the Standard Conditions, and the following:
- (v) IP shall control Bleach Plant “A” emissions utilizing one or both Bleach Plant “A” scrubbers.
 - (vi) IP shall control Bleach Plant “B” emissions utilizing the “Chlorine” scrubber (the second scrubber in the Bleach Plant “B” scrubbing system) or both scrubbers.
 - (vii) IP is exempt from maintaining parameter data on the scrubber that is not in operation.
- [MEDEP Chapter 122, BPT] **Enforceable by State-only**
- (G) The Bleach Plant Scrubber Source Group is subject to the requirements of 40 CFR Part 63 Subpart S and the general provisions of Subpart A.
- (H) VOC RACT
IP shall not utilize sodium hypochlorite as a primary bleaching agent in the Bleach Plant. IP shall operate the Bleach Plant Scrubber System in accordance with Condition (22)(D) at all times the Bleach Plant is in operation. The Department finds this to be meeting VOC RACT for the Bleach Plant. [Chapter 134, VOC RACT]
- (I) IP shall monitor and record the following for each of the Bleach Plant Scrubbers and the ClO₂ Generation System:

Item to be monitored	Record
Scrubber recycle flow rate	Once every 8 hours
Scrubber pressure drop	Once every 8 hours
Scrubber influent pH	Once every 8 hours
Scrubber influent ORP	Once every 8 hours
Scrubber ID fan amps	Once every 8 hours

[MEDEP Chapter 122 and 40 CFR Part 63, Subpart S]

(23) Methanol Bulk Storage Tank

- (A) The Methanol Bulk Storage Tank is subject to the requirements of 40 CFR Part 60, Subpart Kb, which specifies that records be kept showing the dimension and capacity of the storage tank. Since the Methanol Bulk Storage Tank has a design capacity less than 75 m³, it is not subject to any of the other provisions of Subpart Kb except the requirements outlined in this Condition. [40 CFR Part 63, Subpart Kb (§60.116b(b))]
- (B) The Methanol Bulk Storage Tank is not currently in use. IP shall notify the Department before continuing to use the Methanol Bulk Storage Tank. [MEDEP Chapter 140, BPT]

(24) Flash Dryer

- (L) The Flash Dryer shall fire only #2 fuel oil with a maximum sulfur content not to exceed 0.3% by weight. Compliance shall be demonstrated by purchase records from the supplier showing the sulfur content of the fuel within the accuracy of the test methods used. [MEDEP Chapter 140, BPT]
- (M) Total emissions from the Flash Dryer shall not exceed the following:

Pollutant	lb/hr
PM	5.0
PM ₁₀	2.5
SO ₂	25.4
NO _x	11.8
CO	3.0
VOC	0.6

[MEDEP Chapter 140, BPT]

- (N) NO_x emissions from the Flash Dryer shall not exceed 0.14 lb/MMBtu. [MEDEP Chapter 140, BPT]
- (O) Visible emissions from each of the Flash Dryer vents shall not exceed 20% opacity on a 6-minute block average basis, except for no more than one 6-minute block average in a 3-hour period. [MEDEP Chapter 101]
- (P) Compliance with the emission limits for the Flash Dryer shall be demonstrated upon request of the Department. [MEDEP Chapter 140]
- (Q) IP shall evaluate the Flash Dryer controls and report findings to the Department within six months of the signature date of this license. [MEDEP Chapter 140, BPT]

- (R) The Flash Dryer shower system (valving, pressure, flows, etc.) shall be inspected monthly to confirm proper operation. Any problems with the system shall be corrected within 30 days. IP shall make a record of each inspection and the findings of the inspection. These records shall be kept on file for six years. [MEDEP Chapter 140, BPT]
 - (S) Flash Dryer spray nozzles shall be inspected on a semiannual basis and replaced on an annual basis. IP shall record when each inspection was conducted and when the nozzles were replaced. [MEDEP Chapter 140, BPT]
 - (T) When pressure in the Flash Dryer nozzles drops below 60 psi, IP shall initiate corrective action, including shutting down the Flash Dryer, until the pressure can be restored. [MEDEP Chapter 140, BPT.]
- (25) #3 Paper Machine Infrared Dryers
- (A) Visible emissions from the #3 Infrared Dryers shall not exceed 10% opacity on a 6-minute block average basis. [License A-203-71-AU-A]
 - (B) The #3 Infrared Dryers are licensed to fire only propane fuel or natural gas. Compliance shall be demonstrated through fuel purchase receipts. [MEDEP Chapter 140, BPT]
 - (C) Emissions from the #3 Infrared Dryers shall not exceed the following limits:

Pollutant	lb/MMBtu	lb/hr
PM	0.05	0.7
PM ₁₀	--	0.7
SO ₂	--	0.05
NO _x	--	2.0
CO	--	2.2
VOC	--	0.14

[License A-203-71-AU-A]

- (26) #4 Paper Machine Source Group
- The #4 Paper Machine Source Group is comprised of the #4 Calendar Roll, #4 Infrared Dryers, #4 Air Floatation Dryers, and the #4 Trimvac Trim Conveying System.
- (C) #4 Calendar Roll
 - (i) Visible emissions from the #4 Calendar Roll shall not exceed 10% opacity while firing propane and 20% for no more than 5 minutes

in any continuous 1 hour period when firing #2 fuel oil. [License A-203-71-AA-A]

- (ii) The #4 Calendar Roll is licensed to fire propane or #2 fuel oil with a sulfur content not to exceed 0.3% by weight. Compliance shall be demonstrated by fuel receipts from the supplier that indicate the sulfur content of the fuel within the accuracy of the test methods used. [MEDEP Chapter 140, BPT]
- (iii) Emissions from the #4 Calendar Roll shall not exceed the following limits:

Pollutant	Lb/MMBtu	lb/hr
PM	0.12	1.7
PM ₁₀	--	1.4
SO ₂	--	4.2
NO _x	--	4.2
CO	--	4.2
VOC	--	1.4

[Licenses A-203-71-AA-A, and A-203-71-AC-A]

(D) #4 Infrared Dryers

- (i) Visible emissions from the #4 Infrared Dryers shall not exceed 10% opacity. [License A-203-71-AA-A]
- (ii) The #4 Infrared Dryers are licensed to fire only propane fuel or natural gas. Compliance shall be demonstrated through fuel receipts. [MEDEP Chapter 140, BPT]
- (iii) Emissions from the #4 Infrared Dryers shall not exceed the following limits:

Pollutant	Lb/MMBtu	lb/hr
PM	0.05	0.5
PM ₁₀	--	0.5
SO ₂	--	0.01
NO _x	--	2.4
CO	--	3.8
VOC	--	1.0

[Licenses A-203-71-AA-A and A-203-71-AC-A]

- (E) #4 Air Floatation Dryer
- (vi) Visible emissions from the #4 Air Floatation Dryer shall not exceed 10% opacity. [License A-203-71-AA-A]
 - (vii) The #4 Air Floatation Dryer is licensed to fire only propane fuel and natural gas. Compliance shall be demonstrated through fuel receipts. [MEDEP Chapter 140, BPT]
 - (viii) Emissions from the #4 Air Floatation Dryers shall not exceed the following limits:

Pollutant	lb/MMBtu	lb/hr
PM	0.05	0.4
PM ₁₀	--	0.4
SO ₂	--	0.1
NO _x	--	2.0
CO	--	3.2
VOC	--	0.8

[License A-203-71-AA-A]

- (F) #4 Trimvac Trim Conveying System
- (i) Visible emissions from the #4 Trimvac Trim Conveying System shall not exceed 5% opacity on a 6-minute block average basis. [MEDEP Chapter 140, BPT]
 - (ii) Emissions from the #4 Trimvac Trim Conveying System shall not exceed the following limits:

Pollutant	lb/MMBtu	lb/hr
PM	0.05	2.0
PM ₁₀	0.05	1.0

[License A-203-71-AA-A]

- (iii) IP shall operate the wet cyclone separator on the emissions from the #4 Trimvac Trim Conveyor System in accordance with Condition (5) of the Standard Conditions. [MEDEP Chapter 140, BPT]

- (27) Temporary Units Source Group
- The Temporary Units Source Group is comprised of equipment brought on-site by IP and used in a temporary capacity. This includes, but is not limited to, Electrical Generating Stationary Internal Combustion Engines (Electrical Generating SICES), Air Compressors and Wood Tub Grinders.

- (A) IP shall not exceed on an annual basis, a total combined heat input of 30,600 MMBtu/yr from all temporary equipment, including Electrical Generating SICES, Air Compressors and Wood Tub Grinders. In order to document compliance with this condition, IP shall record the total MMBtu that have been consumed to date for the current year for each temporary electrical generating SICE, air compressor, and wood tub grinder that is operated for each day. The log shall be made available to the department upon request. [MEDEP Chapter 140, BPT]
- (B) For the operation of temporary equipment, including Electrical Generating SICES, Air Compressors and Wood Tub Grinders, IP shall not exceed on a daily basis, a total combined heat input of 50 MMBtu/hr. In order to document compliance with this condition, IP shall record in a log the total daily heat input capacities from all of the temporary equipment, including Electrical Generating SICES, Air Compressors and Wood Tub Grinders, that have been operated during any one day. The log shall be made available to the Department upon request. Emission units defined as Insignificant Activities pursuant to Chapter 140 shall not be included in this threshold assessment. [MEDEP Chapter 140, BPT]
- (C) Temporary equipment, including Electrical Generating SICES, Air Compressors, and Wood Tub Grinders, shall be limited to an individual heat input capacity of 20 MMBtu/hr. [MEDEP Chapter 140, BPT]
- (D) The sulfur content of the fuel fired in temporary Electrical Generating SICES shall not exceed 0.05% by weight. Compliance shall be demonstrated by records, including fuel purchase receipts showing the sulfur content of the fuel, noted in the temporary units log book for each day that a temporary Electrical Generating SICE operates. [MEDEP Chapter 140, BPT]
- (E) The fuel fired in temporary Air Compressors and temporary Wood Tub Grinders shall be limited to #2 fuel oil, diesel fuel, natural gas or propane with a sulfur content not to exceed 0.3% by weight. [MEDEP Chapter 140, BPT]
- (F) Visible emissions from each temporary unit shall each not exceed 30% opacity, except for 15 minutes in any 3-hour period. [MEDEP Chapter 140, BPT]
- (G) Compliance with the opacity limits for temporary units shall be demonstrated upon request of the Department. [MEDEP Chapter 140]

- (H) IP shall notify the Bureau of Air Quality within two working days (48 hours) of the operation of any temporary units, including Electrical Generating SICEs, Air Compressors, or Wood Tub Grinders. In addition, IP shall also submit this information in writing within the quarterly report. [MEDEP Chapter 140, BPT]
- (I) For each day there is a temporary unit in operation, IP shall record in a log the following, for each unit:
 - (ii) The maximum heat input capacity in MMBtu/hr;
 - (iii) The date and time, in hours, that the emission unit operates (by an hour meter for Electrical Generating SICEs);
 - (iv) The location within the mill;
 - (v) The fuel type that is fired within the unit, including the percent sulfur content by weight, demonstrated by purchase records from the supplier showing the sulfur content within the accuracy of the test methods used; and
 - (vi) The quantity of fuel input to the temporary unit.

The log shall be made available to the Department upon request. [MEDEP Chapter 140, BPT]

(28) Water Treatment Main Furnace

- (A) The Water Treatment Main Furnace is licensed to fire #2 fuel oil with a sulfur content not to exceed 0.3% by weight. Compliance shall be demonstrated by purchase receipts from the supplier showing the sulfur content within the accuracy of the test methods used. [MEDEP Chapter 140, BPT]
- (B) Emissions from the Water Treatment Main Furnace shall not exceed the following limits:

Pollutant	lb/MMBtu	lb/hr
PM	0.12	0.4
PM ₁₀	--	0.4
SO ₂	--	0.94
NO _x	--	0.93
CO	--	0.11
VOC	--	0.01

[MEDEP Chapter 140, BPT]

- (C) Visible emissions from the Water Treatment Main Furnace shall not exceed 20% opacity on a 6-minute block average basis, except for no more than one 6-minute block average in a 3-hour period. [MEDEP

one 6-minute block average in a 3-hour period. [MEDEP Chapter 101, BPT]

- (O) Wastewater Treatment Plant Source Group
The Wastewater Treatment Plant Source Group is comprised of emission sources in the wastewater treatment plant process. Specifically, the Wastewater Treatment Plant Source Group consists of the two Primary Clarifiers, the Wet Well, the Aeration Lagoon, and the two Secondary Clarifiers.
- (N) IP shall treat the process pulping condensates collected pursuant to 40 CFR Part 63 Subpart S in the Aeration Lagoon to remove 10.2 pounds of HAP per ton of oven dried pulp. The collected condensates shall be routed through the closed collection system and discharged beneath the surface of the Aeration Lagoon. Conveyance from the source to the Aeration Lagoon must meet the requirements of 40 CFR Part 63, Subpart RR. [40 CFR Part 63, §63.446(e)(2)]
- (N) IP shall treat the pulping process condensates to remove 10.2 pounds of HAP per ton of oven dry pulp or greater to achieve a total HAP concentration of 330 ppm or less by weight at the outlet of the control device. [40 CFR Part 63, §63.446(e)]
- (N) IP shall monitor and record the following for the Aeration Lagoon:

Parameter	Record
Inlet soluble COD	Daily
Inlet Flow	Daily
Aerator Horsepower	Daily

IP shall also obtain quarterly samples at the inlet and outlet of each biological treatment unit to perform percent HAP reduction testing as described in 40 CFR Part 63, Subpart S. [MEDEP Chapter 140, BPT and 40 CFR 63, Subpart S]

- (N) The Wastewater Treatment Plant Source Group is subject to MEDEP Chapter 124. IP submitted a BPT analysis for control of TRS from the wastewater treatment plant on December 30, 2003. The BPT analysis findings shall be implemented by January 1, 2007. [MEDEP Chapter 124] **Enforceable by State-only**
- (N) All monitoring, recording and reporting requirements are required as described in 40 CFR Part 63, Subpart S.

- (30) Landfill
- (C) VOC RACT
The Department finds that continued periodic sampling and analysis as required by the DEP solid waste license #S-006247-WD-N-R meets VOC RACT for the Landfill. [MEDEP Chapter 134, VOC RACT]
- (D) IP shall maintain records of the type and quantity of wastes disposed of in the solid waste landfill. Landfill gas emissions shall be monitored in accordance with the "Landfill Gas Monitoring Program." [MEDEP Chapter 140, BPT]
- (E) The areas of the Landfill containing asbestos waste are subject to 40 CFR Part 61, Subpart M §61.154.
- (31) Printing Press Room
IP shall maintain records of all materials used in the conjunction with the Printing Press Room that contain VOCs and the VOC composition of each material. These records shall be made available to the Department upon request. The Department finds this to be VOC RACT for the Printing Press Room. [MEDEP Chapter 134, VOC RACT]
- (32) Bulk Handling Systems Source Group
The Bulk Handling Systems Source Group is comprised of storage silos used in the storage and handling of bulk process elements and the control devices associated with the storage silos. The Bulk Handling Systems Source Group includes the Recaust lime pneumatic unloading system, Starch pneumatic unloading systems #3 - #5, wastewater treatment pneumatic unloading system and saltcake pneumatic unloading systems.
- (A) IP shall maintain the automatic shut-off alarm in proper operating condition. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
- (B) IP shall operate baghouses or air vent filters on each Bulk Handling silo in accordance with Condition (5) of the Standard Conditions. All baghouses or filters shall be maintained such that visible emissions do not exceed 10% opacity on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period. To document maintenance of the baghouses, IP shall keep a maintenance log recording the date and location of all bag failures as well as all routine maintenance. [MEDEP Chapter 101 and MEDEP Chapter 140, BPT]
- (C) IP shall clean up all spills, which shall include lime, clay, saltcake and starch, within 24 hours of the occurrence of each spill. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

- (D) IP shall inspect all unloading systems for leaks and malfunctions before unloading bulk process elements into any of the silos that comprise the Bulk Handling Systems Source Group. If a leak or malfunction is detected during unloading, IP shall discontinue unloading until the leak or malfunction is corrected and eliminated. [MEDEP Chapter 140, BPT]
Enforceable by State-only
- (33) **Condensates Source Group**
IP shall collect pulping process condensates that contain a total HAP mass of 11.1 pounds per ton of oven-dry pulp or greater on a 15-day rolling average basis. All monitoring, recording and reporting requirements required as described in 40 CFR Part 63, Subpart S. [40 CFR Part 63, §63.446(c)]
- (34) **Parts Washers**
Parts washers at IP Jay are subject to MEDEP Chapter 130.
- (A) IP Jay shall keep records of the amount of solvent added to each parts washer. [MEDEP Chapter 115, BPT]
- (B) The following are exempt from the requirements of Chapter 130 [MEDEP Chapter 130]:
- (i) 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);
 - (ii) Wipe cleaning; and,
 - (iii) 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.
- (i) IP Jay shall attach a permanent conspicuous label to each unit summarizing the following operational standards [MEDEP Chapter 130]:
 1. Waste solvent shall be collected and stored in closed containers.
 2. 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.
 3. 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.
 4. The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
 5. Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.

6. 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.
 0. Spills during solvent transfer shall be cleaned immediately. Sorbent material shall be immediately stored in covered containers.
 0. Work area fans shall not blow across the opening of the degreaser unit.
 0. The solvent level shall not exceed the fill line.
- () 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]

(0) Used Oil

The used oil to be burned shall meet the following criteria for specification or off-specification waste oil (generated on or off-site):

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

(C) Specification Waste Oil

Specification waste oil is defined as waste oil that meets all of the following standards, that does not otherwise exhibit hazardous waste characteristics, and that has not been mixed with a hazardous waste:

Constituent/Property	Allowable Level ^a
Arsenic	5.0 ppm maximum
Cadmium	2.0 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Polychlorinated Biphenyls (PCBs)	10 ppm maximum
Total Halogens	1,000 ppm maximum
Flash Point	100 °F minimum

^aConcentrations are in parts per million on a dry weight basis, values for metals are for total metal concentration, not EP Toxic concentration.

(C) Off-Specification Waste Oil

Off-specification waste oil is defined as waste oil that meets all of the following standards, that does not otherwise exhibit hazardous waste characteristics, and that has not been mixed with a hazardous waste:

Constituent/Property	Allowable Level ^a
Arsenic	18.0 ppm maximum
Cadmium	10.0 ppm maximum
Chromium	35 ppm maximum
Lead	1,000 ppm maximum
Polychlorinated Biphenyls (PCBs)	49 ppm maximum
Total Halogens	4,000 ppm maximum
Flash Point	100 °F minimum

^aConcentrations are in parts per million on a dry weight basis, values for metals are for total metal concentration, not EP Toxic concentration.

- (A) A log shall be kept recording the following for the used oil burned in each of the Power Boilers #1 and #2, Recovery Boilers #1 and #2, the WFI and the “A” and “B” Lime Kilns:
- (i) quantity;
 - (ii) type (on or off site generated, specification or off-specification)
 - (iii) sulfur content (NOTE: The sulfur content shall be documented by purchase records from the supplier or by test results performed on a representative sample of onsite generated specification or off-specification used oil, both within the accuracy of the test methods used); and
 - (iv) the manifest records for used oil that is generated off-site.
- These logs shall be made available to the Department upon request.

(36) **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]

(A) **Periodic Monitoring Records**

The following records shall be maintained:

- (i) For the #1 and #2 Power Boilers:
 - 1. the percent (%) sulfur content of the fuel by weight;
 - 2. fuel use records;
 - 3. amount (gallons) and used oil classification for each load of used oil received at the mill;
 - 4. results of any stack tests performed once every 2 calendar years.
- (ii) For the WFI:
 - 1. the percent (%) sulfur content of the fuel by weight;
 - 2. fuel use records;
 - 3. results of PM stack tests performed once every 2 calendar years;

4. amount (gallons) and used oil classification for each load of used oil received at the mill;
 0. scrubbing fluid media solids;
 0. flue gas pressure drop;
 0. scrubbing fluid flow rate (gal/min);
 0. scrubbing fluid pressure from the wet scrubber;
 0. total biomass (ton/hr);
 0. total steam production.
- (ii) For the #1 and #2 Recovery Boilers:
0. the percent (%) sulfur content of the fuel by weight;
 0. results of any stack tests performed once every 2 calendar years;
 0. amount (gallons) and used oil classification for each load of used oil received at the mill;
 0. black liquor solids;
 0. fuel oil firing rate;
 0. black liquor firing rate.
- (ii) For the #1 and #2 Smelt Dissolving Tanks:
0. results of any stack tests performed once every 2 calendar years;
 0. results of scrubber nozzle inspections performed every 6 months;
 0. scrubber bypass incidents greater than 5 min. in duration with reasons for each occurrence;
 0. scrubber media flowrate;
 0. scrubber fan amps.
- (ii) For the "A" and "B" Lime Kilns:
0. results of any stack tests performed once every 2 calendar years;
 0. date and length of time (min) that NCG's are combusted in either lime kiln without the presence of lime;
 0. amount of fuel oil (including #6 and specification used oil) fired in the lime kilns;
 0. amount (gallons) and used oil classification for each load of used oil received at the mill;
 0. the percent (%) sulfur content of the fuel by weight;
 0. high pressure pressure in the "A" Lime Kiln;
 0. high pressure flow in the "A" Lime Kiln;
 0. low pressure flow in the "A" Lime Kiln;
 0. scrubber pressure drop in the "B" Lime Kiln;
 0. scrubbing liquid flowrate in the "B" Lime Kiln.

- (vi) For the RTO Source Group:
 - 1. the percent (%) sulfur content of the fuel by weight;
 - 2. fuel use;
 - 3. firing rate;
 - 4. scrubbing media pH or conductivity;
 - 5. RTO combustion temperature;
 - 6. results of stack testing for TRS and criteria pollutants performed once during the life of this permit;
 - 7. monthly visual leak inspections of the condensate collection system in accordance with the dates and methods of 40 CFR Part 63, Subpart S (when required);
 - 8. annual pressure demonstrations at enclosure openings of the condensate collection system in accordance with 40 CFR Part 63, Subpart S (when required).

- (vii) For the LVHC Source Group:
 - 1. the date, time and reason for occurrence of all TRS venting greater than 1 minute in duration;
 - 2. monthly visual leak inspections of the LVHC collection system in accordance with 40 CFR Part 63, Subpart S;
 - 3. annual leak detection inspections of the condensate collection tank in accordance with 40 CFR Part 63, Subpart S.
 - 4. annual pressure demonstrations at enclosure openings of the condensate collection system in accordance with 40 CFR Part 63, Subpart S.
 - 5. the date and duration of hog ejector use for starting the evaporators.

- (viii) For the Bleach Plant Scrubber Source Group:
 - 1. results of Cl₂ and ClO stack tests performed at least once every calendar year;
 - 2. pH of scrubber influent;
 - 3. scrubber recycle flow;
 - 4. scrubber pressure drop;
 - 5. scrubber influent fluid ORP;
 - 6. scrubber fan amps.

- (ix) For the Flash Dryer:
 - 1. the percent (%) sulfur content of the fuel by weight;
 - 2. fuel use;
 - 3. results of visible emissions and criteria pollutant testing performed on request of the Department;

4. records of monthly shower system inspections and semiannual nozzle inspections and, the findings of each inspection and details of any work completed or nozzles replaced.
- (ii) For the #3 Paper Machine Source Group:
 0. the percent (%) sulfur content of the fuel by weight;
 0. fuel use.
 - (ii) For the #4 Paper Machine Source Group:
 0. The percent (%) sulfur content of the #2 fuel by weight;
 0. Fuel use.
 - (ii) For the Temporary Units Source Group:
 0. the percent (%) sulfur content of the fuel by weight fired in each unit;
 0. the type of fuel fired in each unit;
 0. the total heat input capacities (MMBtu) consumed by temporary units to date for each year;
 0. the total daily heat input capacities (MMBtu) consumed by temporary units;
 0. the maximum heat input capacity of each unit;
 0. date and time (hours) that each unit operates;
 0. each unit's location in the mill;
 0. the quantity of the fuel input to each unit;
 0. results of visible emissions and criteria pollutant testing performed on request of the Department.
 - (ii) For the Water Treatment Main Furnace:
 0. the percent (%) sulfur content of the fuel by weight;
 0. fuel use.
 - (ii) For the Wastewater Treatment Plant:
 0. Inlet soluble COD;
 0. Inlet flow;
 0. Hp of aerator units;
 0. Quarterly percent (%) HAP reduction testing per 40 CFR Part 63, Subpart S.
 - (ii) For the Landfill:

The type and quantity of waste disposed of in the landfill.

- (xvi) For the Printing Press Room:
The type and VOC composition of VOC containing materials used in conjunction with the Printing Press Room.
- (xvii) For the Bulk Handling Systems Source Group:
1. Maintenance log with the date and location of all bag failures and records of routine maintenance on the baghouses;
 2. Records to demonstrate inspection of all unloading systems for leaks and malfunctions before unloading of bulk process elements.
- (xviii) For the Condensates Source Group:
The time of excess emissions (including periods of startup, shutdown or malfunction) divided by the total process operating time.
- (xix) For the Parts Washers Source Group:
Amount of solvent added or removed.

(B) Parameter Monitoring Records

The following records shall be maintained:

- (i) For the #1 and #2 Power Boilers:
fuel oil firing rate into each #1 and #2 Power Boiler.
- (ii) For the WFI:
fuel oil flow rate (gal/min);
- (iii) For the RTO Source Group:
1. scrubber media pH or conductivity;
 2. RTO combustion temperature.

(C) CEMS and COMS Records

The CEMS and COMS at IP's Androscoggin Mill include:

- COMS on the breaching of each #1 and #2 Power Boilers or on the combined stack emissions, and NO_x and O₂ CEMS on each #1 and #2 Power Boiler;
- SO₂, NO_x and O₂ CEMS on the WFI;
- NO_x, SO₂ TRS and O₂ CEMS on each #1 and #2 Recovery Boiler; SO₂ CEMS on the Recovery Boilers' combined stack and a COMS on the combined stack emissions. .
- TRS CEMS on each #1 and #2 Lime Kiln.

The following records shall be kept for the CEMS and COMS at Androscoggin Mill:

- (i) Documentation that all CEMS and COMS are 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;
- (i) Records of all measurements, performance evaluations, calibration checks and maintenance or adjustments for each CEMS and COMS as required by 40 CFR Part 51 Appendix P;
- (ii) A report or other data indicative of compliance with the applicable emission standard for those periods when the CEMS and COMS were 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]

(37) Quarterly Reporting

IP 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, Continuous Emission Monitoring Systems (CEMS) or Continuous Opacity Monitoring Systems (COMS) required by this license. [MEDEP Chapter 117]

- (A) All control equipment downtime and malfunctions during source operation.

Control equipment includes:

- (i) Low-NOx burners on each #1 and #2 Power Boiler;
- (ii) Variable throat venturi scrubber and demister on emissions from the WFI;
- (iii) Rigid frame, dry bottom ESP on the combined emissions from each #1 and #2 Recovery Boilers;
- (iv) Wet scrubbers on emissions from each #1 and #2 Smelt Dissolving Tanks;
- (v) Fixed throat venturi scrubber on emissions from the "A" Lime Kiln;

- (vi) Variable throat venturi scrubber on emissions from the "B" Lime Kiln;
 - (vii) Dual tower packed scrubbers on emissions from each "A" and "B" Bleach Plant in the Bleach Plant Scrubber Source Group;
 - (viii) Four cyclones on emissions from the Flash Dryer (demonstrated by maintenance records);
 - (ix) Wet cyclone separator on emissions from the Trimvac Paper Trim Collection System in the #4 Paper Machine Source Group (demonstrated by maintenance records); and,
 - (x) Baghouses on each of the silos comprising the Bulk Handling Systems Source Group.
- (B) All CEMS or COMS downtime and malfunctions;
- (C) All parameter monitor downtime and malfunction;
- (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;
- (i) standard exceeded;
 - (ii) date, time and duration of excess event;
 - (iii) 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;
 - (iv) a description of what caused the excess event;
 - (v) the strategy employed to minimize the excess event;
 - (vi) the strategy employed to prevent recurrence.
- (E) A report certifying that there were no excess emissions, if such is the case.
- (38) **Semiannual Reporting**
- (A) IP shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on July 30th and January 30th of each year with the initial semiannual report due July 31, 2005. 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. Each semiannual report shall include a summary of the periodic monitoring required by this license.

- (C) 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]

(0) **Annual Compliance Certification**

IP shall submit an annual compliance certification to EPA and the Department in accordance with Standard Condition (13) of this license. The annual compliance certification is due January 30th of each year with the initial annual certification due January 30, 2006. 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]

(0) **Emission Statements**

(B) **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 computer program and accompanying instructions supplied by the Department; or
- () 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 by July 1 or as otherwise specified in Chapter 137.

(B) **Toxic Air Pollutants Emission Statement**

In accordance with MEDEP Chapter 137 IP shall report, no later than July 1, every three years (2005, 2008, 2011, etc.), the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions on the Air Toxics emissions inventory portion should be directed to:

Attn: Toxics Inventory Coordinator
Maine DEP - Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017
Phone: (207) 287-2437

- (0) During periods of start-up, shut-down and malfunction, compliance with all license limits and standards shall be subject to the provisions of 38 M.R.S.A. Section 349 (9) and MEDEP Chapter 101.
- (0) 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. Section 3 §585-B, sub-§5	Reduce Mercury Use and Emissions	Enforceable by State-only

- (0) IP is subject to all applicable requirements of 40 CFR Part 82, Subpart F (Refrigerant Control).
- (0) IP is subject to all applicable requirements of 40 CFR Part 68 (Risk Management Plan).

(0) **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]

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: October 28, 1996

Date of application acceptance: October 28, 1996

Date filed with the Board of Environmental Protection _____

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