

**CMP Androscoggin LLC
Franklin County
Jay, Maine
A-203-70-B-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #1**

After review of the Part 70 License Amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	CMP Androscoggin LLC (CMP Androscoggin) (formerly International Paper Company)
INITIAL LICENSE NUMBER	A-203-70-A-I
LICENSE TYPE	Significant Modification; Administrative Revision
NAICS CODES	322121
NATURE OF BUSINESS	Pulp & Paper Mill
FACILITY LOCATION	Jay, Maine
INITIAL LICENSE ISSUANCE DATE	January 12, 2005
AMENDMENT ISSUANCE DATE	September 29, 2006
LICENSE EXPIRATION DATE	January 12, 2010

B. Modification Description

CMP Androscoggin is requesting a Significant Modification to their Part 70 License in order to:

1. License the facility's compliance approach for both Maximum Achievable Control Technology (MACT) High Volume Low Concentration (HVLC) requirements (40 CFR Part 63 Subpart S) and Maine DEP Chapter 124 Total Reduced Sulfur (TRS) Regulations;
2. Revise the Recovery Boilers, Smelt Tanks and Lime Kilns' conditions as a result of MACT (40 CFR Part 63 Subpart MM) initial performance testing;
3. Clarify the description and conditions relating to the Bulk Handling Systems Source Group;

4. Correct technical information regarding the Water Treatment Main Furnace, add an existing Water Treatment Small Furnace to the Part 70 License which is also located in the Water Treatment Area; and
5. Add an existing 10,000 gallon underground gasoline storage tank and associated applicable requirements to the Part 70 License, which was inadvertently left out of the initial application and Part 70 License.

CMP Androscoggin is requesting an Administrative Revision to their Part 70 License in order to:

1. Clarify the applicability of the Temporary Units Source Group Condition; and,
2. Clarify the technical write-up of the mill's process description in Section II. A. of the Findings of Fact in the Part 70 License.

C. Application Classification

CMP Androscoggin has requested modifications to their Part 70 License that the Department has determined are substantial changes in existing monitoring and testing license terms or conditions. Therefore this request is considered to be a Significant Modification under Chapter 140 of the Department's regulations for a Part 70 source.

Additionally, CMP Androscoggin has requested modifications to correct typographical and other errors in their Part 70 License. The Department has determined that these changes are considered to be Administrative Revisions under Chapter 140 of the Department's regulations for a Part 70 source.

II. LICENSE MODIFICATIONS

A. Significant Modification

1. Compliance Approach to meet 40 CFR 63 Subpart S and MEDEP Chapter 124 TRS Requirements

In 1995, CMP Androscoggin installed a collection and treatment system designed to treat HVLC TRS containing gases. The system controls HVLC gases from various pulping and recovery area sources through a Regenerative Thermal Oxidizer (RTO). The Cluster Rule was promulgated in 1998 and included an eight-year compliance window to comply with newer HVLC collection and treatment requirements. In August 2003, the compliance deadline was extended at the facility's request, from April 2006 to April 2007.

CMP Androscoggin initiated a first pass review of the HVLC system with respect to the MACT requirements in 2003. It was concluded that the system was at maximum capability based on volume and heat load and could not accommodate any additional sources. Weston Solutions was contracted to

complete the RTO and source HAP testing in September 2003 to confirm the contribution of volume and heat load from each major source and to complete knotter and screen exemption testing as allowed by the MACT rule. The September 2003 data indicated that one MACT source was not collected to the RTO; the B Diffusion Washer System had very low emissions and might be suitable for Clean Condensate Alternative (CCA) application. The mill has subsequently demonstrated the viability of this CCA project and has chosen to proceed with this compliance strategy.

CMP Androscoggin is proposing modifications and requesting regulatory review and approval in the following areas to allow them to complete compliance with the MACT and Chapter 124 requirements:

- i. Exemption Status for Knotters & Screen Systems, and Deckers under MACT I Phase II

According to 40 C.F.R. §63.443(a)(1), knotter or screen systems are required to be controlled if HAP emission rates are greater than 0.3 lb/oven dried ton of pulp (ODTP) in total, or greater than 0.1 lb/ODTP for screen systems and 0.2 lb/ODTP for knotter systems individually. Decker systems are required to be controlled if the system uses process water with a total HAP concentration greater than 400 ppmw (400 mg/l) as methanol.

Based on the 2003 HVLC Air Emissions Exemption Testing Study, emissions for both A & B Pulp Mill Knotter and Screen sources are less than the MACT methanol emission exemption thresholds. Additionally, the mill uses mill water and not process condensates in the Decker Showers and both A & B Line Decker Shower Water tested between non-detect and 70mg/l of methanol.

The knotter and screen systems and decker systems are therefore considered exempt from HAP control based on MACT I Phase II requirements.

- ii. MEDEP Chapter 124 TRS Regulation – Economic Evaluation to Control Mass Emissions Caused by Low Chip Bin Venting Incidents and High Chip Bin Venting Incidents

MEDEP Chapter 124 defines “miscellaneous sources” as the following:

“Miscellaneous sources” means sources of TRS which are not controlled but emit TRS at levels greater than 0.75 pounds per hour on a continuous basis under normal operations. Continuous means occurring for more than a 2-hour period. Miscellaneous sources

may include, but are not limited to, knotters, screens, deckers, oxygen delignification systems, liquor storage tanks and chip bins.

CMP Androscoggin has submitted an economic evaluation to support the exemption of the A & B Chip Bins from the collection, treatment and reporting requirements of MEDEP Chapter 124. Chip bin venting occurs under two conditions: periods when the A & B Chip Bins have low chip levels and can emit higher TRS concentrations, and, periods when the A & B Chip Bins have high chip level and absorb most of the TRS, but for which venting is sometimes required during operation to perform maintenance on delivery fans and related equipment – these vents contain low TRS concentrations. The work that would be required to collect the chip bin vents when the chip level is low consists of an upgrade to the RTO, the RTO Scrubber and related equipment, and the following components:

- Two new gas direct contact scrubbers to remove chips and wood dust;
- Two new non-contact condensers to condense low chip bin event gas surges; and,
- Two new conveyor fans.

The economic evaluation finds the average cost to collect and treat TRS from the chip bin vents is estimated to be \$13,278 per pound of TRS. The cost of collecting the chip bin vents is therefore not justifiable. Therefore, vents from low chip bin levels are not subject to the LVHC collection, treatment and reporting requirements in Chapter 124.

iii. MACT Clean Condensate Alternative Emission Reduction Offsets for HVLC Sources

MACT allows a mill the opportunity to collect HAP emissions through a Clean Condensate Alternative which achieves a total HAP emission reduction equal to or greater than the total HAP emissions reduction that would have been achieved by compliance with the requirements of 40 CFR §§ 63.443(a)(1)(ii) through (a)(1)(v).

The mill will use daily emission credits from the over-collection of methanol above and beyond the amount required by the condensate collection MACT I Phase I requirements. This is achieved by routing the over-collected condensates through the existing Hard Pipe System and not through the open primary clarifier system. These credits will be compared with emission debits of methanol emitted from the B-Diffuser System on a 15-day rolling total.

The Department approves CMP Androscoggin's submitted emission credit and debit calculation methodology and examples of the calculations that will occur to ensure compliance with the MACT I Phase II Clean Condensate requirements specified in 40 CFR § 63.447.

iv. Weak and Heavy Black Liquor Tanks

The Strong Black Liquor (SBL) Tank (which is outside and located by the multiple effect evaporators and which feeds the concentrators) and the 68% Heavy Black Liquor Tank are eliminated from the requirements of MEDEP Chapter 124. The SBL Tank was tested under the TRS miscellaneous source collection threshold of 0.75 lb/hr and the 68% Tank emissions were estimated from the SBL Tank test data.

The #1 and #2 Weak Black Liquor Tanks are added to the MEDEP Chapter 124 collection system due to TRS levels being close to the miscellaneous source threshold.

The #3 and #4 Weak Black Liquor Tanks do not vent to the atmosphere except through emergency tank overflow lines and pressure activated safety relief valves. The estimated maximum and average emission rates from these tanks do not exceed the miscellaneous source threshold from Chapter 124; therefore the Department approves exempting these tanks from the collection system.

The Strong Black Liquor Tanks including the 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 Strong Black Liquor Tank, and the 68% Heavy Black Liquor Tank, and the #1, #2, #3, and #4 Weak Black Liquor Tanks are not subject to 40 C.F.R. 60 Subpart S. These tanks are existing sources and are not required to be collected and controlled under MACT I Phase II requirements in 40 C.F.R. 60 Subpart S.

v. Continuous Monitoring System Requirements (CMS) (MACT and MEDEP Chapter 124)

Because several sources are regulated by both the MACT and MEDEP Chapter 124 requirements and several sources by one or the other, the new CMS system for each regulation will overlap in some areas and not in others. This license clarifies which sources will fall into each CMS system and under what criteria they will primarily be regulated.

vi. Converting from Quarterly to Semi-Annual Reporting Cycles

CMP Androscoggin has chosen to use two separate downtime monitoring systems for the MEDEP Chapter 124 TRS and MACT regulations. To relieve strain to the system resulting from the quarterly organization of downtime allowance, CMP Androscoggin is proposing to submit quarterly downtime status reports, however final downtime compliance calculations would be calculated and reported on a semi-annual basis only per Federal MACT Rule regulation requirements. Current requirements are for semi-annual reports for MACT and quarterly reports for the State.

2. Recovery Boilers, Smelt Tanks and Lime Kilns Initial Performance Test for Subpart MM

CMP Androscoggin Jay is using a particulate “bubble” limit over the Recovery Boilers, Smelt Tanks and Lime Kilns, in order to comply with 40 CFR 63 Subpart MM. The mill conducted an initial performance test to demonstrate compliance with the bubble limits selected. The PM limits and compliance language have been updated to reflect the mill’s selected compliance approach.

3. Bulk Handling Systems Source Group

Section II.V of License A-203-70-A-I describes the Bulk Handling Systems Source Group as consisting of two silos in the Coating Prep area. The source description is amended to include Starch Silo #3, which was permitted in License Amendment A-203-71-BD-M on April 1, 2004, prior to the issuance of the Part 70 License.

The requirements for the Bulk Handling Systems unloading operations, state that “IP shall maintain the automatic shut-off alarm in proper operating condition.” CMP Androscoggin does not have automatic shut off alarms for unloading operations, but does operate baghouse rupture alarms. This condition is modified to reflect actual operation at the mill.

4. Water Treatment Area Furnaces

The capacity of the Water Treatment Main Furnace listed in Section I.B. of the Part 70 License A-203-70-A-I needs to be changed from 4.1 MMBtu/hr to the correct capacity of 3.1 MMBtu/hr.

A second Water Treatment Small Furnace (1.1 MMBtu/hr) located in the Water Treatment Area, which was previously considered an Insignificant

Activity under Chapter 140, Appendix B, Section B, needs to be added to the Part 70 License as a licensed emission unit.

5. Gasoline Storage Tank

An existing 10,000 gallon underground gasoline storage tank needs to be added as a licensed emission unit to the Part 70 License. This storage tank was inadvertently left out of the initial Part 70 Application and Part 70 License. The associated applicable requirements need to be added to the Part 70 License.

B. Administrative Revisions

1. Temporary Units Source Group

The Temporary Units Source Group Condition (27) of License A-203-70-A-I is modified to specify that the requirements of the condition apply only to temporary units that are equal to or greater than 3.0 MMBtu/hr in size. Units less than 3.0 MMBtu/hr are listed by category as insignificant activities in CMP Androscoggin's Part 70 application and are not subject to licensing.

2. Process Description Technical Clarification

The following clarifications are made to the Process Description on page 5 of License A-203-70-A-I:

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 unit, 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 (ClO₂) used in the bleaching process is manufactured in a separate process system. A dual scrubber system controls emissions from certain units in the Bleach Plant and the ClO₂ generation system.

ORDER

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

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-203-70-B-A pursuant to MEDEP Chapter 140, the preconstruction permitting requirements of MEDEP Chapter 115, the conditions of License A-203-70-A-I and the following modified and new conditions:

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

The following changes shall be made to Condition (16) of License A-203-70-A-I:

- (16) Recovery Boiler Source Group

The following shall replace Condition (16)(D) of License A-203-71-A-I:

- (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	0.035 @ 8% O ₂	--		133.3	
PM ₁₀	--	--		133.3	
SO ₂	--	180 ^a	30-day rolling	806.6	3-hr block
NO _x	--	206	24-hr block	213.3	24-hr block
CO	--	--		266.6	
VOC	--	--		22.3	
TRS	--	5	12-hr block	--	

[MEDEP Chapter 140, BPT and 40 CFR 63 Subpart MM]

^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, at the request of the Department.

Condition (16)(F) is deleted.

The following shall replace Condition (16)(G) of License A-203-71-A-I:

- (G) Recovery Boilers #1 and #2 shall each not exceed a particulate matter limit of 0.035 gr/dscf corrected to 8% O₂. [40 CFR 63, Subpart MM]

The following shall replace Condition (16)(S) of License A-203-71-A-I:

- (S) CMP Androscoggin 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
Tons black liquor solids fired per day	Once every 24 hours

[MEDEP Chapter 140 and 40 CFR Subpart MM]

The following changes shall be made to Condition (17) of License A-203-70-A-I:

- (17) #1 and #2 Smelt Dissolving Tanks

Condition (17)(D) is deleted.

The following shall replace Condition (17)(E) of License A-203-70-A-I:

- (E) Smelt Tank #1 shall not exceed a PM limit of 0.31 lb/ton black liquor solids (TBLS). Smelt Tank #2 shall not exceed a PM limit of 0.13 lb/TBLS. [40 CFR 63, Subpart MM]

The following changes shall be made to Condition (18) of License A-203-70-A-I:

- (18) "A" and "B" Lime Kilns

Condition (18)(C) is deleted.

The following shall replace Condition (18)(D) of License A-203-70-A-I:

- (D) The “A” and “B” Lime Kilns shall each not exceed a particulate matter limit of 0.13 gr/dscf corrected to 10% O₂. [40 CFR 63, Subpart MM]

The following language shall be modified and added to Condition (19) of License A-203-70-A-I

(19) 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” Full Chip Bins, “A” Knotters, “A” Brown Stock Washers, “A” #1 and #2 Seal Tanks, the Oxygen Delignification System, the Black Liquor Storage Tanks which consist of #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 #1 Weak Black Liquor Tank and #2 Weak 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.

- (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) This condition is in effect until April 17, 2007. The RTO System shall meet a minimum average of 95% (except as allowed for during construction and startup of the upgraded system as described in new Condition (48) of this amendment) 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) This condition is in effect until April 17, 2007. The RTO System shall control the collected emissions and CMP Androscoggin shall meet, at a minimum, a 95% RTO System availability on a quarterly basis (except as allowed for during construction and startup of the upgraded system as described in new Condition (48) of this amendment), based on the amount of time that emissions are sent to the RTO System for control.
[MEDEP Chapter 124]

 - (I) The knotter and screen systems and decker systems are exempt from HAP Control under MACT I Phase II requirements. [40 CFR 63, Subpart S]

 - (J) Weak and Heavy Black Liquor Tanks
 - i. The Strong Black Liquor Tank and the 68% Heavy Black Liquor Tank are not required to be collected under MEDEP Chapter 124 [MEDEP Chapter 124, BPT]
 - ii. The #1 and #2 Weak Black Liquor Tanks are required to be collected in the HVLC system under MEDEP Chapter 124. These tanks will be collected by the April 17, 2007, compliance date. [MEDEP Chapter 124, BPT]
 - iii. The #3 and #4 Weak Black Liquor Tanks are not required to be collected under MEDEP Chapter 124. [MEDEP Chapter 124, BPT]

 - (K) Uptime and Continuous Monitoring System Requirements in effect starting April 17, 2007.
 - i. CMP Androscoggin's HVLC system shall maintain a 96% collection and control uptime (except as allowed for during construction and startup of the upgraded system as described in new Condition (48) of this amendment), with a start-up, shut-down and malfunction allowance, based on the time of vents divided by the total process operating time in a semi-annual reporting period for the following sources:
 - a. A-Pulp Mill Nos. 1 & 2 Brown-stock Washer Hood Vents;
 - b. A-Pulp Mill Nos. 1 & 2 Brown-stock Washer Seal (Weak Liquor Filtrate) Tank Vents;
 - c. Oxygen Delignification Drum Washer Hood Vent;
 - d. Oxygen Delignification Drum Washer Seal (Filtrate Tank) Vent;
 - e. Oxygen Delignification O2 Tower Vent;
 - f. Oxygen Delignification System;
 - g. A-Pulp Mill Combined Source Condenser Vent/Bypass Vent; and
 - h. Main RTO Bypass Vent.
- [40 CFR 63 Subpart S]

- ii. CMP Androscoggin shall operate and maintain according to the manufacturer's specifications, a continuous monitoring system to determine HVLC system vent time and RTO combustion temperature. The CMS shall include a continuous recorder. [40 CFR 63 Subpart S]
- iii. Under MEDEP Chapter 124, CMP Androscoggin's HVLC system shall maintain a 96% collection and control uptime (except as allowed for during construction and startup of the upgraded system as described in new Condition (48) of this amendment), with no start-up, shut-down and malfunction allowance, based on quarterly system operating time on a total mass weighted basis for the following sources:
 - a. A-Pulp Mill Combined Source Condenser Vent/Bypass Vent;
 - b. A-Pulp Mill No.1 BSW Seal Tank (Filtrate Tank) Vent;
 - c. Power House Combined Source Vent;
 - d. Nos. 1 & 2 Weak Black Liquor Tank Vent(s);
 - e. Main RTO Inlet Bypass Vent; and
 - f. A and B Chip Bin high level vents
- iv. CMP Androscoggin's HVLC continuous monitoring system parameters shall meet the following requirements:
 - a. A continuous monitoring device to measure and record the combustion temperature must be accurate to within \pm one (1)% of the temperature being measured and must achieve 95% uptime based on quarterly incineration time. CMP Androscoggin will report RTO combustion temperature parameter downtime in the quarterly status reports and semi-annual reports.
 - b. Scrubber pH will be continuously monitored.

[MEDEP Chapter 124]
- v. Sources that will be collected but will not count towards MEDEP Chapter 124 downtime or MACT HVLC are:
 - a. No. 1 Secondary Knotter; and,
 - b. The Parshall Flume.

[MEDEP Chapter 124]
- vi. Any timeframe during which venting occurs shall be counted as one minute of venting for any minute that either an individual source or header comprised of multiple sources in the combined header are venting. There can be no more than 1440 minutes of vent time in a day. [MEDEP Chapter 140, BPT]

The following language shall be modified and added to Condition (20) of License A-203-70-A-I

(20) LVHC Source Group

(G) The A and B Chip Bins are exempt from the collection, treatment and Leak Detection and Repair (LDAR) requirements of MACT provided CMP Androscoggin Jay complies with the following:

- i. Ensures fresh, non-process steam use on the chip bins;
- ii. Ensures fresh, non-process steam use on the low pressure feeder pocket purge;
- iii. Ensures wood chip level in the bin is high enough to condense/adsorb LVHC emissions; and,
- iv. Monitors the time of actual chip bin vents caused by chip bin chip levels dropping low enough to cause LVHC gas collection bypass (NOTE: High chip bin level chip bin gases are collected within the HVLC collection system as long as the collection source fan is operational) – as indicated by high temperature in the top of the chip bins(s) and delivery fan cut off while the digester system is in operation.

[40 CFR 63 Subpart S]

(H) The A and B Chip Bins are exempt from the LVHC collection, treatment and reporting requirements of MEDEP Chapter 124. [MEDEP Chapter 124, BPT]

(I) Uptime and Continuous Monitoring System Requirements

(i) The LVHC/NCG System, currently subject to MACT I LVHC requirements and MEDEP Chapter 124 requirements, will continue to monitor the following sources under future Chapter 124 TRS requirements:

1. Concentrated Seal Tank Vent;
2. A & B Evaporator Seal Tank Vents;
3. A & B NCG Seal Pot Vents;
4. A & B Low Pressure Feeder Exhaust;
5. MACT Condensate Collection Tank Vent;
6. A & B Digester Steaming Vessel Relief Lines;
7. 1 & 2 Digester Blow Tank Vents;
8. A-Digester Cyclone;
9. A-Level Tank; and,
10. Combined LVHC Header Bypass vent.

[MEDEP Chapter 124, 40 CFR 63 Subpart S]

- (ii) Any timeframe during which venting occurs shall be counted as one minute of venting for any minute that either an individual source or header comprised of multiple sources in the combined header are venting. There can be no more than 1440 minutes of vent time in a day. [MEDEP Chapter 140, BPT]
- (iii) If the venting allowance exceeds the 1% vent allowance then such an excess emissions event shall be counted as one event against the combined MACT/Chapter 124 requirements and not as separate incidents (for the same event minute) against both requirements. [MEDEP Chapter 140, BPT]
- (iv) Periods of LVHC excess emissions reported under MACT I 40 C.F.R. §63.455 shall not be a violation of 40 C.F.R. §63.443 (c) and (d) provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed (1) one percent. [40 C.F.R. Part 63 Subpart s].

The following replaces Condition (27) of License A-203-70-A-I:

- (27) Temporary Units Source Group
The Temporary Units Source Group is comprised of equipment with individual rated capacities equal to and larger than 3.0 MMBtu/hr brought on-site by CMP Androscoggin and used in a temporary capacity. This includes, but is not limited to, Electrical Generating Stationary Internal Combustion Engines (Electrical Generating SICES), Package Boilers, Air Compressors and Wood Tub Grinders.
 - (A) CMP Androscoggin 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, CMP Androscoggin shall record the total MMBtu that have been consumed to date for the current year for each temporary Electrical Generating SICE, Package Boiler, 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, Package Boilers, Air Compressors and Wood Tub Grinders, CMP Androscoggin shall not exceed on a daily basis, a total combined heat input of 50 MMBtu/hr. In order to document compliance with this condition, CMP Androscoggin shall record in a log the total daily heat input capacities from all of the temporary equipment, including Electrical

Generating SICEs, Package Boilers, 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, Package Boilers and Wood Tub Grinders, shall be limited to an individual heat input capacity of 20 MMBtu/hr. [MEDEP Chapter 140, BPT]
- (D) Temporary equipment, including Electrical Generating SICEs, Air Compressors, Package Boilers and Wood Tub Grinders smaller than 3.0 MMBtu/hr are not subject to the requirements of this Condition. [MEDEP Chapter 140, BPT]
- (E) 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]
- (F) The fuel fired in temporary Package Boilers, temporary Air Compressors and temporary Wood Tub Grinders shall be limited to utilizing #2 fuel oil, diesel fuel, natural gas, or propane. [MEDEP Chapter 140, BPT]
- (G) Visible emissions from each temporary unit shall each not exceed 30% opacity, except for no more than two six-minute block averages in a 3-hour period. [MEDEP Chapter 140, BPT]
- (H) Compliance with the opacity limits for temporary units shall be demonstrated upon request of the Department. [MEDEP Chapter 140]
- (I) CMP Androscoggin shall notify the Bureau of Air Quality within two working days (48 hours) if the operation of any temporary units on a daily basis exceeds a total combined heat input of 48 MMBtu/hr. In addition, CMP Androscoggin shall also submit this information in writing within the quarterly report. [MEDEP Chapter 140, BPT]
- (J) For each day there is a temporary unit in operation, CMP Androscoggin shall record in a log the following, for each unit:
 - (i) The maximum heat input capacity in MMBtu/hr;

- (ii) The date and time, in hours, that the emission unit operates (by an hour meter for Electrical Generating SICES);
- (iii) The location within the mill;
- (iv) The fuel type that is fired within the unit shall be demonstrated by purchase records from the supplier; and
- (v) The quantity of fuel input to the temporary unit.

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

The following changes shall be made to Condition (28) of License A-203-70-A-I:

- (28) Water Treatment Furnaces (two)
 - (A) The Water Treatment Main Furnace and Small Furnace are 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]
 - (C) Visible emissions from the Water Treatment Main Furnace and Small 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 Chapter 101, BPT]

The following replaces Condition (32)(A) of License A-203-70-A-I:

- (32) Bulk Handling Systems Source Group
 - (A) CMP Androscoggin shall maintain the baghouse rupture alarms in proper operating condition. [MEDEP Chapter 140] **Enforceable by State-only**

The following are new conditions:

- (46) Clean Condensate Alternative
 - (A) MACT Credits Calculation
CMP Androscoggin shall calculate MACT credits for the Clean Condensate Alternative by measuring the methanol over-collection beyond MACT I Phase I requirements. Credits shall be calculated in lb/day from the daily emissions reductions achieved by routing the over-collected condensates through the existing Hard Pipe System and not through the open primary clarifier. The facility will subtract the MACT I

Phase I required methanol collection in lb/ODTP from the total measured daily methanol collection entering the Hard Pipe to determine the over-collection of methanol that can be applied in the MACT I Phase II CCA credit calculations. The over-collected methanol in lb/ODTP shall be multiplied by the facility's daily pulp production in ODTP/day and the primary clarifier atmospheric methanol emissions rate determined by EPA's WATER9 methanol emissions model to calculate the daily CCA emission reduction credit in lb methanol/day.

Over-collection in lb methanol /ODTP * ODTP/day mill pulp production * % WATER9 volatilization = lb of emissions reduction credits accrued per day

(B) MACT Debits Calculation

CMP Androscoggin shall calculate MACT debits for the Clean Condensate Alternative by summing the methanol emissions from the B-Diffusion Washer System vents. Methanol emissions from the B-Diffusion Washer shall be calculated by multiplying the B-Digester daily production by the B-Diffusion Washer System emission factor in lb methanol/ODTP established in 2003 during HAP testing.

B-Diffusion Washer System Methanol calculation: lb/ODTP factor * B-pulp-ODTP/day = B-Diffusion Washer System lb/day methanol emissions

(C) Clean Condensate Alternative Total HAP Emission Reduction

CMP Androscoggin shall calculate the total HAP emission reduction from the Clean Condensate Alternative by comparing the 15-day rolling average MACT Credits and the 15-day rolling average MACT Debits (which accrue from both the B-Diffusion Washer System). To demonstrate compliance with the MACT standards of 40 CFR §§ 63.443(a)(1)(ii) through (a)(1)(v), CMP Androscoggin shall demonstrate that the total HAP emissions reductions achieved by the Clean Condensate Alternative 40 CFR § 63.447 are equal or greater than the total HAP emission reductions that would have been achieved by compliance with 40 CFR §§ 63.443(a)(1)(ii) through (a)(1)(v).

(D) The Clean Condensate Alternative shall meet all the requirements of 40 CFR §§ 63.447(a) through (h).

[40 CFR 63 Subpart S]

- (47) Reporting Cycle for MACT and Chapter 124
CMP Androscoggin shall submit separate downtime status reports for MACT and TRS regulations on a quarterly basis. CMP Androscoggin shall submit final downtime reports and calculations on a semi-annual basis only. [MEDEP Chapter 140, BPT]
- (48) HVLC Project Tie-Ins
Upgrades and new tie-ins to the RTO System are needed to implement CMP Androscoggin's compliance plan for MACT and Chapter 124. The construction of these upgrades and tie-ins is currently planned to begin in late September or early October of 2006. Therefore the upgrades are expected to effect RTO System downtime in the 3rd and 4th quarters of 2006. Collection System and control equipment tie-ins and work on the RTO are expected to take approximately two to three weeks, which will result in RTO and RTO collection system downtime. This condition allows a RTO and RTO collection system downtime greater than 5% of the operating period in the quarters that HVLC MACT compliance construction and system startup occurs for the purpose of meeting HVLC MACT and Chapter 124 requirements. Total downtime for the construction, startup, and commissioning of the RTO System shall not exceed 28 calendar days without prior request from and approval by the Department.
Enforceable by State-Only
- (49) **Gasoline Tank**
- (A) The Androscoggin Mill shall maintain records of monthly and annual gasoline throughput. Copies of these records shall be maintained for a minimum of three years. [MEDEP Chapter 118]
- (B) CMP Androscoggin shall maintain a submerged fill pipe that extends to within six inches of the bottom of the gasoline storage tank. [MEDEP Chapter 118]

**CMP Androscoggin LLC
Franklin County
Jay, Maine
A-203-70-B-A**

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**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #1**

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

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-203-70-A-I.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 2, 2006

Date of application acceptance: March 15, 2006

Date filed with the Board of Environmental Protection: _____

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