

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

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #2**

After review of the air emissions 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
PART 70 LICENSE NUMBER	A-203-70-A-I
LICENSE TYPE	Part 70 Administrative Revision
NAICS CODES	322121
NATURE OF BUSINESS	Pulp & Paper Mill
FACILITY LOCATION	Jay, Maine
PART 70 LICENSE ISSUANCE DATE	January 12, 2005
ADMINISTRATIVE REVISION ISSUANCE DATE	January 19, 2007
PART 70 LICENSE EXPIRATION DATE	January 12, 2010

B. Amendment Description

CMP Androscoggin LLC (CMP Androscoggin) of Jay, Maine has requested an Administrative Revision of their Part 70 Air Emission License (A-203-70-A-I) under MEDEP Chapter 140 to incorporate the permitted changes to the maximum allowed sulfur content of the #2 fuel oil used in the Water Treatment Main Furnace from 0.3% to 0.5% by weight and to add a furnace to the license that was previously considered an "Insignificant Activity". The Water Treatment Small Furnace is being added to the license due to the fact that it will also be licensed to burn #2 fuel oil that contains a maximum sulfur content of 0.5% by weight, and therefore, will no longer meet the criteria to continue being considered an "Insignificant Activity".

The Chapter 115 New Source Review order A-203-77-1-M permitted the source to fire the maximum sulfur content in #2 fuel oil because, although there is evidence that #2 fuel oil is readily available at a sulfur content of 0.35% or lower, sources have found it difficult to obtain reliable documentation of the sulfur content for smaller individual loads of #2 fuel oil. Therefore, where a lower sulfur content requirement is not needed to demonstrate compliance with Ambient Air Quality Standards, as is the case here, the Department finds it appropriate to allow an increase in the license allowed maximum sulfur content up to 0.5% as defined by ASTM D396 standards for #2 fuel oil.

C. Emission Equipment

The following equipment is addressed in this Part 70 Administrative Revision:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>
Water Treatment Main Furnace	3.1	22	#2 fuel oil, 0.5%
Water Treatment Small Furnace	1.1	8	#2 fuel oil, 0.5%

D. Application Classification

These changes have already been processed under MEDEP Chapter 115 and a new source review license has been granted. The purpose of this application is to incorporate these changes into CMP Androscoggin's Part 70 Air Emission License (A-203-70-A-I). Therefore, these changes are considered a Part 70 Administrative Revision under MEDEP Chapter 140 and will be processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Department regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Water Treatment Main Furnace

The Water Treatment Main Furnace fires #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. This furnace is currently listed in CMP Androscoggin's Part 70 License A-203-70-A-I. The only change to the license regarding this unit is the replacement of 0.35% with 0.5%, as the maximum sulfur content of the #2 fuel oil used in this furnace.

A summary of the BPT analysis for the Water Treatment Main Furnace (3.1 MMBtu/hr) is the following and the change only affects sulfur dioxide (SO₂):

1. Chapter 106 regulates fuel sulfur content, however in this case a BPT/BACT analysis for SO₂ determined a limit of 0.5% was appropriate and shall be used.
2. Chapter 103 regulates PM emission limits from fuel burning equipment having a rated capacity of 3 MMBtu/hr or greater. This unit is subject to Chapter 103 based on its capacity, therefore, the PM limit is based upon Chapter 103 and the PM₁₀ limit is derived from the PM limit.
3. NO_x emission limits are based on data from similar #2 fuel oil fired boilers of this size and age.
4. CO and VOC emission limits are based upon AP-42 data dated 9/98.
5. Visible emissions from the Water Treatment Main Furnace shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block averages in a continuous 3-hour period.

C. Water Treatment Small Furnace

The Water Treatment Small Furnace fires #2 fuel oil at a maximum design capacity of 1.1 MMBtu/hr, and as such is not subject to NSPS Subpart Dc. This furnace is not currently listed in CMP Androscoggin's Part 70 License A-203-70-A-I as it was previously considered an "Insignificant Activity" per Chapters 115 and 140, Appendix B, Section B.2. This states that fuel burning equipment with a maximum design heat input of less than 3.0 MMBtu/hr firing fuel with a sulfur content less than 0.35% is an "Insignificant Activity". Since this unit is now being licensed to fire #2 fuel oil with a maximum sulfur content of 0.5%, it will be added to the Part 70 License as a licensed unit.

A summary of the BPT analysis for the Water Treatment Small Furnace is the following:

1. Chapter 106 regulates fuel sulfur content, however in this case a BPT/BACT analysis for SO₂ determined a limit of 0.5% was appropriate and shall be used.
2. Chapter 103 regulates PM emission limits from fuel burning equipment having a rated capacity of 3 MMBtu/hr or greater. This unit is not subject to Chapter 103 based on its capacity, however, the Department finds that it is appropriate to base the PM and PM₁₀ limits on Chapter 103.
3. NO_x emission limits are based on data from similar #2 fuel oil fired boilers of this size and age.
4. CO and VOC emission limits are based upon AP-42 data dated 9/98.
5. Visible emissions from the Water Treatment Small Furnace shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block averages in a continuous 3-hour period.

D. Annual Emissions

CMP Androscoggin's Water Treatment Main Furnace and Water Treatment Small Furnace shall be restricted to the following annual emissions, based on a 12 month rolling total:

**Licensed Annual Emissions
 Tons/year**

(used in conjunction with other licensed annual emissions to calculate the annual license fee for the facility)

	PM	PM₁₀	SO₂	NO_x	CO	VOC
Water Treatment Main Furnace	1.6	1.6	6.8	4.1	0.5	0.03
Water Treatment Small Furnace	0.6	0.6	2.3	1.4	0.2	0.01
Total TPY	2.2	2.2	9.1	5.5	0.7	0.04
Licensed Annual Emissions firing 0.35%S #2 fuel oil	2.2	2.2	6.4	5.5	0.7	0.04
Increase in Licensed Annual Emissions	0.0	0.0	2.7	0.0	0.0	0.0

III. AMBIENT AIR QUALITY ANALYSIS

CMP Androscoggin previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate

ambient air quality standards. An additional ambient air quality analysis is not required for this minor revision.

ORDER

The Department hereby grants Part 70 Air Emission License Amendment #2 (A-203-70-D-A), subject to the conditions found in Part 70 Air Emission License A-203-70-A-I and Amendment #1 (A-203-70-B-A) and the following modified and new conditions below.

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 shall replace Condition (28) of License A-203-70-A-I:

(28) Water Treatment Main Furnace and Water Treatment Small Furnace

- A. CMP Androscoggin shall only fire #2 fuel oil, meeting ASTM D396, in the Water Treatment Main Furnace and in the Water Treatment Small Furnace. Compliance shall be demonstrated by fuel records from the supplier. [MEDEP Chapter 115, BPT]
- B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Water Treatment Main Furnace	PM	0.12	MEDEP, Chapter 103, Section 2(B)(1)(a)

- C. Emissions shall not exceed the following [MEDEP Chapter 115, BPT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Water Treatment Main Furnace	0.4	0.4	1.6	0.93	0.11	0.01
Water Treatment Small Furnace	0.13	0.13	0.53	0.32	0.04	0.003

- D. Visible emissions from either the Water Treatment Main Furnace or the Water Treatment Small Furnace shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [MEDEP Chapter 101]

The following changes shall be made to Condition (36) of License A-203-70-A-I:

(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:

The following shall replace Condition (36)(A)(xiii) of License A-203-70-A-I:

(xiii) For the Water Treatment Main Furnace and Water Treatment Small Furnace:

1. type of fuel (i.e., #2 fuel oil meeting ASTM D396 specifications);
2. fuel use.

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

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: June 5, 2006

Date of application acceptance: October 12, 2006

Date filed with the Board of Environmental Protection: _____

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