

MeadWestvaco Oxford Corporation
Oxford County
Rumford, Maine
A-214-70-A-I

Departmental
Findings of Fact and Order
Part 70 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 | MeadWestvaco Oxford Corporation (The Mill) |
| LICENSE NUMBER | A-214-70-A-I |
| LICENSE TYPE | Initial Part 70 License |
| NAICS CODES | 322121 |
| NATURE OF BUSINESS | Pulp & Paper Mill |
| FACILITY LOCATION | Rumford, Maine |
| DATE OF LICENSE ISSUANCE | July 30, 2003 |
| LICENSE EXPIRATION DATE | July 30, 2008 |

B. Emission Equipment

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

| EMISSION UNIT ID | UNIT CAPACITY | UNIT TYPE |
|------------------|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| Power Boiler #3 | 300 MMBtu/hr | Fuel Burning #6 oil, natural gas, NCGs, HVLCs, SOG's, specification & off-specification used oil |
| Power Boiler #5 | 300 MMBtu/hr | Fuel Burning #6 oil, natural gas, NCGs, HVLCs, SOG's, specification & off-specification used oil |
| Cogen Boiler #6 | 610 MMBtu/hr (annual) 630 MMBtu/hr (24-hr) | Fuel Burning #6 oil, biomass, coal, TDF, DPC, specification & off-spec used oil, natural gas, lime kiln rejects, NCG's, SOG's, HVLCs |

| | | |
|----------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| Cogen Boiler #7 | 610 MMBtu/hr (annual) 630 MMBtu/hr (24-hr) | Fuel Burning #6 oil, biomass, coal, TDF, DPC, specification & off-spec used oil, natural gas, lime kiln rejects, NCG's, SOG's, HVLCs |
| Lime Kiln | 90 MMBtu/hr | Process Equipment #6 oil, natural gas, NCGs |
| Recovery Boiler C | N/A | Process Equipment #6 oil, natural gas, black liquor, soap |
| 4 Flootation Dryers | (2) 6.4 MMBtu/hr (2) 8.05 MMBtu/hr | Fuel Burning propane or natural gas |
| Cogen Emerg Gen | 150 kW | Fuel Burning diesel fuel |
| R15 Emerg Gen | 125 kW | Fuel Burning diesel fuel |
| Mill Emerg Gen | 558 kW | Fuel Burning diesel fuel |
| Diesel Fire Pump | 230 hp | Fuel Burning diesel fuel |
| Landfill Flare | N/A | Fuel Burning supplemental propane |
| Methanol Storage Tank | 20,000 gallons | Process Equipment |
| Smelt Tank C | N/A | Process Equipment |
| Lime Slaker | N/A | Process Equipment |
| Bleach Plant | N/A | Process Equipment |
| 1 Kamyr Continuous Digester, 250 ton Blow Tank, 10 Batch Digesters, 2 Batch Blow Tanks | N/A | Process Equipment |
| A Line and B Line Brown Stock Washers | N/A | Process Equipment |
| Multiple Effect Evaporators | N/A | Process Equipment |
| Groundwood Operations | N/A | Process Equipment |
| Bulk Handling Systems | N/A | Process Equipment |
| Steam Stripper System | N/A | Pollution Control Equipment |
| LVHC System | N/A | Pollution Control Equipment |

| | | |
|----------------------------------------------------------------|-----|-----------------------------|
| HVLC Systems | N/A | Pollution Control Equipment |
| #10, 11, 12, 15 Papermachines & On- Line Aqueous Coaters | N/A | Process Equipment |
| Pulp Dryer | N/A | Process Equipment |

NCGs – Non-Condensable Gases (Low Volume, High Concentration Gases)

HVLCs – High Volume, Low Concentration Gases

TDF – Tire Derived Fuel

DPC – Delayed Petroleum Coke

SOGs – Stripper Off Gases

NOTE: Emission units which have listed 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.

The Mill has additional insignificant activities, which do not need to be listed in the emission equipment table above. The 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 the Mill 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.

II. EMISSION UNIT DESCRIPTION

A. Process Description

The Mill operates one Kamyr continuous digester and 10 batch digesters in which wood is "cooked" in a chemical solution of sodium and sulfur compounds called white liquor to dissolve lignin from around wood fibers.

Pulp from the digesters, called brown stock, is washed in the brown stock washer systems to remove residual spent cooking liquor from the pulp. After the pulp is washed in the brown stock washers, the pulp is bleached to a desired brightness and then sent to the paper production area. In the paper production area the bleached pulp is then used in the paper machines to make paper or is dried as bleached pulp.

The spent cooking liquor exiting the digesters, called black liquor, contains dissolved and suspended inorganic and organic compounds. The black liquor is

then sent into the multiple effect evaporation system to evaporate the water and bring the solids in the liquor to a higher concentration.

Upon exiting the multiple effect evaporation system, the concentrated black liquor, with a black liquor solids (BLS) content of 70% or more, is burned in the recovery boiler for chemical recovery and the production of steam.

Pulping chemicals left over after combustion of black liquor in the recovery boilers, primarily sodium and sulfur compounds are collected in the bottom of the recovery boiler as molten “smelt”. The smelt flows out of the bottom of the recovery boiler to a smelt dissolving tank, where the hot smelt mixes with weak wash to form green liquor. Quantities of steam are generated and vented from the smelt tank through two smelt tank scrubbers.

Green liquor from the smelt tank flows to the causticizing/lime kiln area, where chemicals reclaimed in the recovery boiler and smelt tank are further processed into the white liquor used in the digester system to cook the wood. Lime (CaO) is used in the causticizing process to convert the recovered but inactive sodium compounds into active compounds. The purpose of the lime kiln is to recover and recycle the lime. Hydrated lime from the lime slaker reacts with the green liquor, and calcium carbonate (CaCO₃) is precipitated out as mud.

The lime mud is then washed, filtered, and sent to the lime kiln where the CaCO₃ is reclaimed (carbon dioxide, CO₂, is driven off), and the recovered lime (CaO) is recycled back into the process. Lime mud enters the upper end of the kiln and is passed through successive stages of water evaporation, mud preheating, and lime calcination.

Lime produced in the lime kiln is sent to the hot lime silo, which feeds the slaker along with any fresh lime makeup. In the slaker, the lime is mixed with water to convert the lime into hydrated lime (Ca(OH)₂).

The hydrated lime produced in the lime slaker discharges into the causticizing system. The causticizing system converts the green liquor into white liquor, which is then recycled back to the digester system, as described above.

B. Power Boilers #3 & #5

Power Boiler #3 was manufactured in 1948 by Combustion Engineering and is currently licensed at a capacity of 300 MMBtu/hr. Boiler #3 was installed in 1948, prior to the New Source Performance Standards (NSPS) applicability date for Subpart D and Db.

Power Boiler #5 was manufactured in 1971 and 1972 by Erie City and is currently licensed at a capacity of 300 MMBtu/hr. Boiler #5 was designed to burn #6 fuel oil and wood. While Boiler #5 was re-licensed in 1993 to burn oil only, it was originally installed with oil burning capacity. Construction of Boiler #5 was begun before the August 1971 NSPS applicability date and completed in 1972.

Boilers #3 & 5 are licensed to fire natural gas, non-condensable gases, high volume low concentration gases, stripper off gases, specification and off-specification oil, and #6 fuel oil with a sulfur content not to exceed 2.5% by weight. These boilers are each equipped with low NO_x burners and flue gas recirculation (FGR) for the control of NO_x as well as variable venturi scrubbers for the removal of particulate matter and SO₂. In addition, they are equipped with a combustion system designed to ensure the optimal balance between control of NO_x and limitation of CO and VOCs. The FGR system experiences downtime during soot blows due to several potential operational and safety issues occurring. These include plugging of the flue orifices with soot fines rendering them inoperable, fouling of the series of linkages which modulate air to the burner front, which in turn would hinder burner performance, and the risk of causing burner flame out, which in turn may cause a boiler Master Fuel Trip (MFT). Emissions exit through a common 362-foot stack.

During the 1993 permitting process, a Best Available Control Technology (BACT) analysis was performed for Boilers #3 and #5. At that time, the control strategies outlined above were determined to be meeting BACT.

Streamlining

Opacity

The Mill accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(2) of the Department's regulations and previous BACT analysis requirements are applicable. The previous BACT analysis opacity limit is more stringent. Therefore, only the more stringent opacity limit is included in this license.

Particulate Matter

The Mill accepts streamlining for particulate matter requirements. Chapter 103 of the Department's regulations and previous BACT requirements are applicable. The previous BACT analysis particulate matter limit is more stringent. Therefore, only the more stringent particulate matter limit is included in this license.

Sulfur Dioxide

The Mill accepts streamlining for sulfur dioxide requirements. Chapter 106 and previous BACT requirements are applicable. The previous BACT analysis sulfur dioxide limit is more stringent. Therefore, only the more stringent sulfur dioxide limit is included in this license.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping that includes fuel use records and fuel analysis records. Periodic monitoring for Power Boilers #3 and #5 shall also consist of the following:

| Item to be Monitored | Monitor | Record |
|-------------------------|---------------------|---------------------|
| scrubber media solids | once every 24 hours | once every 24 hours |
| fuel oil firing rate | continuously | continuously |
| natural gas firing rate | continuously | continuously |

The Mill shall stack test Boilers #3 and #5 every two years for PM in accordance with 40 CFR Part 60, Appendix A, Method 5.

Periodic monitoring also includes the instrument monitoring and recordkeeping requirements in Chapter 117 of the Department's Regulations.

Based on best management practices and the type of fuel for which the boilers were designed, it is unlikely that Boilers #3 and #5 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.

Continuous Emission Monitors (CEMS)

Continuous Emission Monitoring for Boilers #3 and #5 shall consist of the following:

| CEM | Monitor | Record |
|-----------------|--------------|--------------|
| NO _x | continuously | continuously |
| SO ₂ | continuously | continuously |

Parameter Monitoring

Parameter monitoring for Power Boilers #3 and #5 shall consist of the following parameters as specified:

| Parameter | Monitor | Record |
|---------------------------------------------|--------------|--------------|
| venturi pressure drop | continuously | continuously |
| firing duration of NCGs, HVLCs, and/or SOGs | continuously | continuously |

C. Cogen Boilers #6 & #7

Cogen Boilers #6 & #7 are two identical circulating fluidized bed boilers (CFB) manufactured by Pyropower. Boilers #6 & #7 were permitted in 1986 and started operations in 1990. During the original permitting process a BACT (Best Available Control Technology) analysis was performed. In 1993 the Mill permitted an increase in the maximum firing rate of Boilers #6 & #7. At that time a new BACT analysis was performed and incorporated into air emission license A-214-71-O-A.

Both Boilers are subject to NSPS, 40 CFR Part 60, Subpart Db for SO₂, opacity, particulate matter and NO_x. Emissions exit through a common 411 foot stack.

The SO₂ lb/MMBtu BACT emission limit for Boilers #6 & #7 was determined in Amendment #5 (A-214-71-O-A) to Air Emission License A-214-71-E-A/R to be 0.28 lb/MMBtu for any combination of fuel and 0.32 lb/MMBtu for any combination of fuel that includes coal, DPC, TDF on a 24-hour block average basis. In addition, Boilers #6 & #7 are subject to a BACT requirement that the circulating limestone bed used in SO₂ control must remove at least 90% of the sulfur from the coal, tire derived fuel (TDF), delayed petroleum coke (DPC), and oil used. The averaging time for the 90% efficiency shall be a 30-day rolling average. Based on these lower emission limitations and SO₂ control requirements, it was determined by the Department that the BACT is more stringent and thus demonstration with the BACT emission limit is a demonstration of the NSPS limit.

40 CFR Part 60, Subpart Db specifies that NO_x lb/MMBtu emissions from Boilers #6 & #7 shall not exceed 0.3 or 0.6 on a 30-day rolling average basis, when firing liquid or solid fossil fuel, respectively. The circulating fluidized bed boiler design incorporates cyclonic mechanics to promote completeness of combustion at a relatively low combustion temperature, thus qualifying as an inherently low NO_x system. These mechanics minimize emissions of nitrogen oxides, carbon monoxide, VOCs, and particulate matter emissions. The operation of NO_x CEMS along with the circulating fluidized bed technology were determined to meet the definition of an equivalent low NO_x control strategy as required by Chapter 138 and were determined to be BACT for Cogen Boilers #6 & #7. Chapter 138 requires that emission rates for lb/MMBtu of NO_x emitted be calculated on a 24-hr daily block average basis.

40 CFR Part 60, Subpart Db specifies that particulate lb/MMBtu emissions from Boilers #6 & #7 shall not exceed a limit within the range of 0.05 to 0.20 depending on the fuel type, capacity factors and permit conditions. Flue gases from Boilers #6 & #7 pass separately through multi-cyclones and an electrostatic

precipitator (ESP) to reduce particulate matter emissions, from each boiler. Each ESP has one chamber and 4 fields per chamber and is powered by 4 Transformer Rectifier (T.R.) Sets. The ESPs have demonstrated compliance with Boilers' #6 & #7 emission limits with 2 fields per ESP operating. Stack testing has demonstrated compliance in this mode and is considered to meet BACT for operational purposes.

Currently, Boilers #6 & #7 are licensed to fire a variety of fuels, including coal with a maximum sulfur content not to exceed 3.5% by weight, natural gas, HVLCs, NCGs, SOGs, biomass (including wood waste, creosote treated wood chips, mill waste, wastewater treatment plant sludge, and waste papers), Tire Derived Fuel (TDF), Delayed Petroleum Coke (DPC), lime kiln rejects, and Oil (including specification used oil, off-specification used oil, and #6 fuel oil with a maximum sulfur content not to exceed 2.5% by weight). The firing rate capacity of Boilers #6 & #7 depends on what fuel or fuel mixture is employed. Boilers #6 & #7 are each currently licensed at the following maximum firing rates:

| <u>Fuel</u> | <u>Max Capacity</u> <u>(MMBtu/hr)</u> |
|-------------|-------------------------------------------------------|
| Combination | 630 (24-hr block avg.) 610 (12-month rolling avg.) |

NSPS for Boiler #6 & #7 specifies that visible emissions from the combined stack for the boilers shall not exceed 20% on a 6-minute average, except for one period per hour of not more than 27% opacity. This opacity standard shall apply at all times, except during periods of startup, shutdown, or malfunction. Opacity is measured on the combined stack, and thus during the startup or shutdown of one boiler, the other may still be under normal operations.

From the time Boilers #6 & #7 were put on line in 1990, the Mill has experienced opacity events that are a result of startup or shutdown operations. Per 40 CFR Part 60, §60.43b(g), Boilers #6 and #7 are exempt from the NSPS opacity standards. However, these boilers are still subject to State opacity standards. In 1996, the Mill demonstrated to the Department's satisfaction that, due to the inherent characteristics of CFB boilers, the opacity events that the Mill experiences are not the result of poor operation or maintenance. CFBs require that bed material be continuously circulated around the boiler for proper operation and heat transfer. During startup of these units, a great deal of time is spent loading the bed material at rates that allow for a smooth startup operation. At the same time, oil is fired in the boilers to raise the combustion temperature, until combustion of solid fuels can be sustained without oil firing. During startup, the ESPs are operated in a manner that decreases the efficiency of the units. During

shutdown the bed material must remain in circulation for a period of time as the bed material is being removed. Combustion of fuel is not occurring during this period. As a result of these CFB characteristics, opacity events are experienced which are regulated through MSRA Title 38, Section 590.5.

NFPA 85 Boiler and Combustion Systems Hazards Code (Section 4.6.2.5.2) requires that the electrostatic precipitator trip on interlock with a boiler Master Fuel Trip (MFT). The code requirement is intended to prevent ignition of potentially explosive gases that may be present in the precipitator chamber following a boiler trip. The MFT requirement may result in unavoidable opacity exceedances. Therefore, when an affected unit experiences a MFT that is not the result of operator error or poor maintenance, it is a result of a malfunction meeting the definition of that term in 40 CFR Part 60.2 , and therefore excess opacity during such events are not violations under the authority of 40 C.F.R. Part 60.43b(g).

Through modeling required by the Department, it was determined that increased particulate emission rates from Boilers #6 & #7 could still meet Maine Ambient Air Quality Standards for periods of time which most approximately simulate startup and shutdown conditions. In addition past ambient monitoring data collected from the area was evaluated and it was determined that short term opacity events from Boilers #6 & #7 did not have an effect on the short term monitored pollutant impact concentrations of the same time periods.

Therefore, Condition (26) of this license incorporates the opacity allowance previously granted by the Department, pursuant to 38 M.R.S.A. Section 590, Subsection 5 for a specified period of time for each boiler during a startup or shutdown, and with the additional parameter monitoring requirements as specified in this license. The additional parameter monitoring requirements shall be used to document normal operations of a boiler during a period identified for the other boiler as being in startup or shutdown operations.

During a calibration of the gravimetric feeder for Boilers #6 & #7 and during startup and shutdown, the SO₂ emissions are increased as a result of oil firing. Through a modeling demonstration requested by the Department, it was determined that increased SO₂ emissions from Boilers #6 & #7 could still meet Maine Ambient Air Quality Standards and therefore conditions to allow increased SO₂ emissions have been incorporated into this license.

Streamlining

Particulate Matter

The Mill accepts streamlining for particulate matter requirements. Chapter 103 of the Department's regulations and 40 CFR Part 60, Subpart Db, and previous BACT determinations are applicable. The previous BACT analysis particulate matter limits are more stringent. Therefore, only the most stringent particulate matter limits are included in this license.

Sulfur Dioxide

The Mill accepts streamlining for sulfur dioxide requirements. Chapter 106, 40 CFR Part 60, Subpart Db, and previous BACT determinations are applicable. The previous BACT analysis sulfur dioxide limit is more stringent. Therefore, only the most stringent requirements are included in this license.

Nitrous Oxides

The Mill accepts streamlining for NO_x requirements. Chapter 138 and 40 CFR Part 60, Subpart Db and previous BACT determination requirements are applicable. The Chapter 138 limit is more stringent. Therefore, only Chapter 138 requirements are included in this license.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping that includes fuel use records and fuel analysis records. Periodic monitoring for Power Boilers #6 and #7 shall also consist of the following:

| Item to be Monitored | Monitor | Record |
|-----------------------------|----------------|-----------------|
| ESP Voltage | continuously | every half hour |
| ESP Amperage | continuously | every half hour |

Periodic monitoring also includes the instrument monitoring and recordkeeping requirements in Chapter 117 of the Department's Regulations.

The Mill shall stack test Boilers #6 and #7 every two years for PM and PM₁₀ in accordance with 40 CFR Part 60, Appendix A, Method 5.

Based on best management practices and the type of fuel for which the boilers were designed, it is unlikely that Boilers #6 and #7 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.

Continuous Emission / Opacity Monitors (CEMS / COMS)

Continuous Emission/Opacity Monitoring for Boilers #6 and #7 shall consist of the following:

| CEM | Monitor | Record |
|-----------------|----------------|---------------|
| NO _x | continuously | continuously |
| SO ₂ | continuously | continuously |
| Opacity | continuously | continuously |

Parameter Monitoring

In the event that only one boiler is in the process of startup or shutdown and the other is under “normal” operation, the Mill shall monitor and record the following surrogate parameter values indicative of boiler performance:

| Parameter | Monitor | Record |
|-----------------------------------------------|----------------|-----------------|
| Boiler air/fuel ratio | continuously | every half hour |
| Boiler combustion O ₂ trim control | continuously | every half hour |
| ESP Voltage | continuously | every half hour |
| ESP Amperage | continuously | every half hour |

D. Lime Kiln

The Mill installed a new lime kiln in 1989. The lime kiln is subject to NSPS 40 CFR Part 60, Subpart BB for Kraft Lime Kilns constructed after September 24, 1976. The kiln fires #6 fuel oil with a maximum sulfur content not to exceed 2.0% by weight, when there is no lime within the kiln and 2.5% by weight, when there is lime within the kiln. The kiln burner has a design capacity of 90 MMBtu/hr. The #6 fuel oil is fired to aid in the recalcination of the lime, which is then returned to the slaker. In addition, the kiln can fire Non Condensable Gases (NCGs) generated by the pulping process. The lime kiln subjects NCGs to 1200 °F for at least 0.5 seconds. The lime kiln is also licensed to fire natural gas.

Emissions from the lime kiln are controlled by a wet scrubber. The lime mud is also an effective media to scrub SO₂ emissions generated from the incineration of Total Reduced Sulfur Compounds (TRS). Emissions are vented to a 263 foot stack.

NO_x RACT for the lime kiln is compliance with MEDEP Chapter 138 limits and demonstration by biennial stack tests in accordance with 40 CFR, Part 60, Appendix A.

The lime kiln is subject to the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP's) for Chemical Recovery Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicemical Pulp Mills, 40 CFR Part 63, Subpart MM as of the effective date of the rule.

Streamlining

Particulate Matter

The Mill accepts streamlining for particulate matter requirements. Chapter 105 of the Department's regulations and previous BACT determinations are applicable. The previous BACT analysis particulate matter limit is more stringent. Therefore, only the more stringent particulate matter limit is included in this license.

On March 13, 2004, 40 CFR Part 63, Subpart MM requirements will also apply to this source. At that time, the requirements of 40 CFR Part 63, Subpart MM will become the most stringent particulate matter limits.

Sulfur Dioxide

The Mill accepts streamlining for sulfur dioxide requirements. Chapter 106, and previous BACT requirements are applicable. The previous BACT analysis sulfur dioxide limit is more stringent. Therefore, only the more stringent requirements are included in this license.

Total Reduced Sulfur

The Mill accepts streamlining for total reduced sulfur (TRS) requirements. Chapter 124, 40 CFR PART 60, Subpart BB, and previous BACT requirements, are applicable. The previous BACT analysis limit for TRS is more stringent. Therefore, only the more stringent requirements are included in this license.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping that includes fuel use records and fuel analysis records. Periodic Monitoring for the Lime Kilns shall also consist of the following:

| Item to be Monitored | Monitor | Record |
|-----------------------------|---------------------|---------------------|
| scrubber media solids | once every 24 hours | once every 24 hours |
| NCGs firing duration | continuously | continuously |

Periodic monitoring also includes the instrument monitoring and recordkeeping requirements in Chapter 117 of the Department's Regulations.

The Mill shall stack test the lime kiln every two years for PM and PM₁₀ in accordance with 40 CFR Part 60, Appendix A, Method 5.

Based on best management practices and the type of fuel for which the lime kiln was 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.

Continuous Emission Monitors (CEMS)

Continuous Emission Monitoring for the Lime Kiln shall consist of the following:

| CEM | Monitor | Record |
|------------|----------------|---------------|
| TRS | continuously | continuously |

Parameter Monitors

The Mill shall operate and record the following parameter monitors as specified for the lime kiln:

| Parameter | Monitor | Record |
|-------------------------|----------------|--------------------|
| scrubber media flowrate | continuously | once every 8 hours |

E. Recovery Boiler C

The Mill installed Recovery Boiler C (RBC) in 1981. RBC is a Babcock and Wilcox low odor design boiler. RBC is used by the Mill to recover pulping chemicals and produce steam. Emissions exit through a 290 foot stack.

RBC is subject to NSPS 40 CFR Part 60, Subpart BB for Kraft Recovery Boilers manufactured after September 24, 1976. RBC will also be subject to National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills, 40 CFR Part 63, Subpart MM as of the effective date of the rule. RBC is not subject to 40 CFR Part 60, Subpart D for fossil fuel-fired steam generating units because its annual capacity for oil is limited to less than 10%.

RBC fires #6 fuel oil with a maximum sulfur content not to exceed 2.0% by weight when there is no smelt within the boiler, and 2.5% by weight when there is smelt within the boiler. RBC is fired with fuel oil for startup purposes (in order to initiate BLS firing) in addition to shutdowns and other events which require the addition of oil firing. Recovery Boiler C is also licensed to fire natural gas.

During periods of time when the RBC has to fire oil, the SO₂ emissions are increased. Through a modeling demonstration requested by the Department, it

was determined that increased SO₂ emissions from RBC could still meet Maine Ambient Air Quality Standards.

In 2002 the Mill applied for a major modification to their air emission license in order to revise the permitted NO_x emission limits for RBC. At that time, Best Available Control Technology (BACT) for NO_x was addressed and a new NO_x BACT driven permit limit of 110 ppmdv was approved. The project modification reflected a change in emission calculation methodology only and did not include any physical modifications to RBC.

The particulate emissions from RBC are controlled by the operation of a S.F. Flakt Electrostatic Precipitator (ESP). The ESP is a rigid frame, dry bottom (European) design. The ESP has two chambers with 4 fields per chamber and is powered by 8 Transformer Rectifier (T.R.) Sets. The Mill has also demonstrated compliance during periods of precipitator maintenance with one of the two chambers in operation at reduced boiler load.

NO_x RACT for RBC was determined to be the installation of a NO_x CEMS and compliance with limits of MEDEP Chapter 138 on a 24-hour block average basis. As specified in MEDEP Chapter 138, Section 3(O), for any source that employs the use of a continuous emissions monitoring system, periods of startup, shutdown, equipment malfunction and fuel switching shall not be included in determining 24-hour daily block arithmetic average emission rates provided that operating records are available to demonstrate that the facility was being operated to minimize emissions.

Emissions of Total Reduced Sulfur (TRS) from RBC are to be controlled in accordance with MEDEP Chapter 124.

Streamlining

Opacity

The Mill accepts streamlining for opacity requirements. Chapter 101, Section 2(B)(2) of the Department's regulations, 40 CFR Part 60, Subpart BB, Section 282.a.1.ii, previous BACT requirements, and BPT are applicable. The BPT analysis opacity limit is most stringent. Therefore, only the more stringent opacity limit is included in this license.

Sulfur Dioxide

The Mill accepts streamlining for sulfur dioxide requirements. Chapter 106 and previous BACT requirements are applicable. The previous BACT analysis sulfur dioxide limit is more stringent. Therefore, only the more stringent requirements are included in this license.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes fuel use records and fuel analysis records.

Periodic Monitoring for RBC shall also consist of the following:

| Item to be Monitored | Monitor | Record |
|-----------------------------|---------------------|---------------------|
| virgin black liquor solids | once every 24 hours | once every 24 hours |
| black liquor firing rate | continuously | continuously |

Periodic monitoring also includes the instrument monitoring and recordkeeping requirements in Chapter 117 of the Department's Regulations.

The Mill shall stack test RBC every two years for PM and PM₁₀ in accordance with 40 CFR Part 60, Appendix A, Method 5.

Based on best management practices and the type of fuel for which the recovery boiler was designed, it is unlikely that RBC 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.

Continuous Emission/Opacity Monitors (CEMS / COMS)

Continuous Emission/Opacity Monitoring for RBC shall consist of the following:

| CEM | Monitor | Record |
|-----------------|----------------|---------------|
| NO _x | continuously | continuously |
| SO ₂ | continuously | continuously |
| TRS | continuously | continuously |
| Opacity | continuously | continuously |

F. Smelt Tank C

Smelt Tank C was installed in 1981. It is equipped with two venturi scrubbers, which were also installed in 1981. Emissions exit through two stacks 200 hundred feet above ground level.

Smelt Tank C is subject to NSPS 40 CFR Part 60, Subpart BB for Kraft Smelt Tanks manufactured after September 24, 1976, which requires TRS emissions to meet a limit of 0.033 lb/ton BLS. Smelt Tank C is also subject to National Emission Standards for Hazardous Air Pollutants for Chemical Recovery

Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills, 40 CFR Part 63, Subpart MM as of the effective date of the rule.

The Mill is required by Chapter 124 to meet a TRS emission limit of 0.016 g/kg black liquor solids as H₂S (0.033 lb/ton black liquor solids as H₂S) from the smelt tank. In addition, the Mill is required by a license condition to control particulate emissions from smelt tank C by a wet scrubber system. As a result, some of the VOC emissions from the smelt tank C are also controlled. The wet scrubber, which controls particulate and TRS emissions, represents RACT for VOC emissions.

Streamlining
Particulate Matter

The Mill accepts streamlining for particulate matter requirements. 40 CFR Part 63, §63.862(a)(1)(i)(B) and previous BACT requirements are applicable. The previous BACT analysis particulate matter limit is more stringent. Therefore, only the more stringent particulate matter limit is included in this license.

Periodic Monitoring

The Mill shall operate the following periodic monitors as specified for Smelt Tank C:

| Item to be monitored | Monitor | Record |
|-----------------------|---------------------|---------------------|
| scrubber media solids | once every 24 hours | once every 24 hours |

The Mill shall stack test smelt tank C every two years for PM in accordance with 40 CFR Part 60, Appendix A, Method 5 and every two years for TRS in accordance with 40 CFR Part 60, Appendix A.

Parameter Monitors

The Mill shall operate monitors and record the following parameters as specified for Smelt Tank C:

| Parameter | Monitor | Record |
|-------------------------|--------------|--------------|
| venturi pressure drop | continuously | continuously |
| scrubber media flowrate | continuously | continuously |

G. Lime Slaker

The Mill operates one lime slaker manufactured by Ahlstrom Corp. The slaker was installed in 1989 and began operation in 1990. Emissions are controlled by a venturi scrubber and vented to a 120 foot stack. Wet scrubbing is considered the

most appropriate control alternative for this type of source because the scrubbing media can be reused in the process.

Lime slakers are not addressed by NSPS 40 CFR Part 60, Subpart BB nor 40 CFR, Part 63.

Parameter Monitoring

The Mill shall operate monitors and record the following parameters as specified for the lime slaker:

| Parameter | Monitor | Record |
|-------------------------|--------------|--------------|
| venturi pressure drop | continuously | continuously |
| scrubber media flowrate | continuously | continuously |

H. Causticizers

The Mill operates four causticizing tanks. The causticizing tanks #1, #2, and #3 have their emissions vented through the lime slaker venturi scrubber. The causticizing tank #4 is vented to atmosphere. The Causticizers were installed in 1989 and began operation in 1990.

Causticizers are not addressed by NSPS 40 CFR Part 60, Subpart BB nor 40 CFR Part 63. Causticizers are identified as an insignificant activity under Chapter 140, Appendix B, § B(A)(88).

I. Bleach Plant

The Mill Bleach Plant shall be defined as the Bleach Plants A-Line and B-Line, the Bleaching Scrubber System, the R8 ClO₂ Generation Plant, and the ClO₂ Scrubber System. In June 1992 the Mill installed a Wet Scrubber System to control chlorine (Cl₂) and chlorine dioxide (ClO₂) emissions from the Bleach Plant to less than 3.0 lb/hr each as required by MEDEP Chapter 122.

1. Bleach Plants A-Line and B-Line

The Mill operates two bleaching lines (A and B), each of which are composed of three bleaching stages (D, E_{op}, D). Each bleaching stage consists of a reaction tower, washer, and sealtank. The chlorine and chlorine dioxide emissions are collected and controlled by the Bleaching Lines Control Systems. The Bleaching Lines Control Systems consist of two packed tower scrubbers in series for each bleach line.

For each bleach line scrubber system the gases enter the first packed bed scrubber where caustic, white liquor, and/or weak wash is the scrubbing media. The gases then continue to the second packed bed scrubber, which

uses white liquor and/or weak wash. Both the A and B line scrubber systems vent to a combined 140 foot stack. There is also a crossover line to connect the scrubber systems should one of them malfunction or fail. Each scrubber system is capable of controlling combined emissions from both A and B bleach lines. In addition, each individual scrubber system is capable of controlling emissions with one of the two packed tower scrubbers in operation.

2. ClO₂ Production

In addition, the Mill operates an R8 process to generate chlorine dioxide. This process reacts sodium chlorate with methanol and sulfuric acid in a chlorine dioxide generator. In addition to ClO₂, sodium sesquisulfate crystals (acid saltcake) is formed. The saltcake slurry is pumped from the generator to a filter. The generator liquor and weak wash are recirculated to the process. The sodium sesquisulfate is removed from the filter and sent to a dissolving tank. From the dissolving tank, the saltcake solution is pumped to other mill processes.

The chlorine dioxide gas leaves the generator and passes through an indirect contact cooler, which removes some water vapor and thus increases the concentration of the chlorine dioxide gas. The gas then goes to the ClO₂ absorption tower (designated S-3) to absorb the ClO₂ with chilled water. The off-gases from the S-3 absorber along with other tank and equipment vents within the R-8 process are drawn into the vent scrubber (S-10). Chilled water is used in the vent scrubber (S-10) to absorb ClO₂. The weak ClO₂ solution is then drawn into the absorption tower (S-3). Off-gases from the vent scrubber (S-10) are drawn into the white liquor scrubber (designated S-16) which uses white liquor and/or caustic and/or weak wash to scrub any remaining Cl₂ or ClO₂. Emissions from the ClO₂ Scrubber System vent to an 8 foot stack.

The Bleach Plant is subject to the requirements of MEDEP Chapter 122 as well as the National Emission Standards for Hazardous Air Pollutants for the Pulp and Paper Source Category, 40 CFR Part 63, Subpart S. The R8 chlorine dioxide generator and the extraction stage of the bleach plant are not subject to Subpart S.

The control of emissions from the Bleach Plant by the Bleach Plant Scrubber System and the discontinued use of sodium hypochlorite as a primary bleaching stage has been determined to meet VOC RACT.

Parameter Monitors

The Mill shall operate monitors and record the following parameters as specified for the Bleach Plant Scrubber Systems A & B and the ClO₂ Generation Plant Scrubber System:

| Parameter for each scrubber | Monitor | Record |
|------------------------------------|----------------|----------------|
| recycle flow | continuously | once per shift |
| pressure drop | continuously | once per shift |
| recycle ORP | continuously | once per shift |
| fan amperage | continuously | once per shift |

Pursuant to 40 CFR §63.453(m), the Mill has proposed alternative monitoring parameters be used in place of the scrubber vent gas inlet flow rate required by §63.453(c). This request was approved by EPA per a letter dated March 29, 2001. The Mill shall monitor fan amperage for the bleaching system gas scrubber vent gas fan in lieu of monitoring vent gas inlet flow rate.

Pursuant to 40 CFR §63.453(m), the Mill has proposed alternative monitoring parameters be used in place of monitoring the bleach plant scrubber effluent as required by §63.453(c). This request was approved by EPA per a letter dated July 11, 2001. The Mill shall monitor bleach plant scrubber recycle Oxidation/Reduction Potential (ORP) in lieu of monitoring ORP at the bleach plant scrubber effluent. In a letter dated June 14, 2001, the Mill requested MEDEP Chapter 122 and 40 CFR 43.453 (c) be aligned, allowing continuous monitoring of ORP in lieu of pH. The requirement to monitor both parameters is redundant for the purposes of ensuring collection and treatment of chlorine and chlorine dioxide emissions. In addition, the ORP measurement system is subject to the uptime requirements of MEDEP Chapter 122 and the Federal Rules. Therefore, pH monitoring is not needed to supplement the ORP measurement in the event of downtime of this monitor. MeadWestvaco shall monitor ORP in lieu of pH.

As required by MEDEP Chapter 122, parametric monitors must operate at least 90% of the time during each quarter.

J. Digesters

The Mill operates one Kamyr continuous digester and 10 Batch digesters. The Kamyr digester was installed in 1961. Batch digesters #5 - #10 were installed in 1949. Batch digesters #1 - #4 were installed in 1990.

VOCs and total reduced sulfur compounds (TRS) are emitted from the digester systems. VOCs and TRS are currently captured by a collection system and then

incinerated in the lime kiln, Boiler #3, Boiler #5, or Cogen Boilers #6 or #7. Condensates from this system are treated by the Steam Stripper.

Batch digesters #1 - #4 are subject to NSPS 40 CFR Part 60 Subpart BB for Kraft Digesters manufactured after September 24, 1976.

The digesters vent to the Mill's LVHC system for the purposes of MEDEP Chapter 124 and are subject to 40 CFR Part 63, Subpart S per §63.443(a)(1)(i).

K. Brown Stock Washers

The Mill operates two brown stock washer lines. The Softwood Line was installed in 1961 and the original Hardwood Line was installed in 1951. The Hardwood Rewasher was installed in 1961 (prior to NSPS) and originally operated as the Softwood decker until 1990. The CB washer was installed in 1990 and the DD washer was installed in 2002. Regulated pollutants emitted from the brown stock washer systems are VOCs and TRS.

The softwood washer system was installed prior to the applicability date for NSPS 40 CFR Part 60, Subpart BB for Kraft Mill Brown Stock Washers. The Mill has replaced three hardwood vacuum drum washers with a new low flow Hardwood washer (DD Washer). This project was permitted in Air Emission License A-214-71-AG-A. The new low flow hardwood washer is subject to NSPS 40 CFR Part 60, Subpart BB.

Both washer systems are subject to the National Emission Standards for Hazardous Air Pollutants for the Pulp and Paper Source Category, 40 CFR Part 63, Subpart S as well as MEDEP Chapter 124, TRS Control. The collection system for the brown stock washers is discussed further in Part N of this section.

During development of Chapter 134, the Paper Industry Information Office performed a VOC RACT analysis on various VOC sources from a representative paper mill in Maine. From that analysis it was determined that the control of VOCs from the pulp stock washers would have an adverse economic impact and thus VOC emission from the Pulp Stock Washer Systems were meeting VOC RACT as of the May 31, 1995 compliance deadline under Chapter 134.

L. Multiple Effect Evaporators

The multiple effect evaporators were designed and manufactured by Goslin-Birmingham and installed in 1981. The evaporators were designed to have six effects and are non-contact systems. A regulated pollutant emitted from the multiple effect evaporators is TRS, which is collected and incinerated in the lime kiln, Boiler #3, Boiler #5, or Cogen Boilers #6 or #7. Certain condensates from

this system are collected and treated by the Steam Stripper as specified in 40 CFR Part 63, Subpart S.

The multiple effect evaporators are subject to NSPS 40 CFR Part 60, Subpart BB for Kraft Multiple Effect Evaporators manufactured and installed after September 24, 1976.

The evaporators are part of the Mill's LVHC system for the purposes of MEDEP Chapter 124 and are subject to 40 CFR Part 63, Subpart S per §63.443(a)(1)(i).

The control of VOC emissions from the evaporators by the lime kiln, Power Boilers #3 or #5, or Cogen Boilers #6 or #7 was determined to be meeting VOC RACT.

M. LVHC System

In accordance with 40 CFR Part 63, Subpart S and Chapter 124 requirements and in an effort to reduce emissions of malodorous compounds at the Rumford Mill, the Mill operates Non-Condensable Gas (NCG) control systems as part of their LVHC system for the following equipment:

1. Digester Systems
2. Evaporator Systems
3. Steam Stripper System

The NCGs collected from the digester systems and evaporator systems are considered part of the Mill's LVHC system for the purposes of MEDEP Chapter 124. The relief and blow gases from the digesters as well as the TRS laden gases from the evaporators are collected and incinerated in either Boiler #3, Boiler #5, the Lime Kiln, Boiler #6 or Boiler #7.

Condensates from these NCG systems are collected and treated by the steam stripper. The requirements for the steam stripper are addressed in Section II.P and Condition (37).

N. HVLC System

In accordance with 40 CFR Part 63, Subpart S requirements and in an effort to reduce emissions of malodorous compounds at the Rumford Mill, the Mill operates the following NCG control systems as part of their HVLC system.

1. Kamyr Chip Bin Vent Gas Control System

The collection and oxidation of the Kamyr chip bin vent gases reduces emissions to the atmosphere of TRS, VOCs, and methanol. The NCGs

collected from the chip bin are considered part of the Mill's HVLC system for the purposes of MEDEP Chapter 124 and are subject to miscellaneous source requirements effective July 1, 2007.

The Kamyrr chip bin vent gases are subject to the requirements of 40 CFR Part 63, Subpart S with an effective date of April 17, 2001.

The chip bin is sealed to reduce the generated gas volume and minimize infiltration, thus reducing the danger of NCG gas explosions by minimizing oxygen content of the vent gases. The gases from the chip bin are cooled and scrubbed before collection further reducing the volume of sulfur compounds to be oxidized in the mill boilers and dampening out variability. A flame arrester is installed in the NCG collection line after the chip bin condenser. Rupture disks, monitored by a pressure switch, are installed for overpressure protection. The gases are transported to the point of oxidation by a steam eductor. Condensates from the piping system are directed to the existing steam stripper system. The NCGs are oxidized in either Boiler #3, Boiler #5 or the Cogen Boilers #6 or #7. The TRS compounds in the gases are oxidized to SO₂. SO₂ is then controlled by the boiler scrubbers.

2. Hardwood Brown Stock Washer Control System

The NCG piping will collect the applicable vents within the hardwood brown stock washer system. The NCGs collected from the hardwood brown stock washer system are considered part of the Mill's HVLC system for the purposes of MEDEP Chapter 124. The Mill has replaced the three vacuum drum washers with a new low flow brownstock washer (called the DD washer. The new DD washer is subject to the requirements of 40 CFR Part 63, Subpart S and 40 CFR Part 60, Subpart BB, NSPS for Kraft Pulp Mills. The existing CB washer is also subject to the requirements and effective dates of 40 CFR Part 63, Subpart S.

In accordance with MEDEP Chapter 124, Section 3.D, the hardwood brown stock washer system has until the MACT compliance date of April 17, 2006 to meet the conditions of MEDEP Chapter 124, Section 3.A. The hardwood brown stock washer vents are transported to the point of oxidation in the same line as the chip bin vent gases and oxidized in Boiler #3 or #5 or to the Cogeneration Boilers #6 & #7 as discussed above.

The hardwood washer line is equipped with a decker. The decker uses fresh water or process water containing less than 400 ppmw of HAPS (measured as methanol). The Mill is therefore not required to collect these gases per 40 CFR Part 63, Section 63.443(a)(1)(iv)(A) and (B). The hardwood decker is also below the threshold of a miscellaneous source for MEDEP Chapter 124. If in the future shower water containing more than 400 ppmw of HAPS is

used on the hardwood decker, the Mill will be required to collect the gases and vent them to the NCG system. Until that time, the Mill has demonstrated that the use of stripped condensate as shower water will not result in an increase in annual emissions.

3. Softwood Brown Stock Washer Control System

The softwood brown stock washer hoods will be sealed to minimize NCG vent gas volume. The NCG piping will collect the applicable vents associated with the softwood brown stock washer system. The NCGs collected from the softwood brown stock washer system are considered part of the Mill's HVLC system for the purposes of MEDEP Chapter 124. The softwood brown stock washer system shall comply with the requirements of MEDEP Chapter 124 by April 17, 2005. In addition, the softwood decker has been tied into the NCG system to allow the option of using alternate shower water. The collected NCGs are oxidized in Boilers #3 or #5 or Cogen Boilers #6 or #7 as discussed above. The softwood brown stock washer system is subject to the requirements and effective dates of 40 CFR Part 63, Subpart S.

4. Storage Tank Vent Control System

Several storage tank vents will be controlled to minimize the emissions of malodorous compounds. The tank vents controlled include: recovery saltcake mix tank, precipitator mix tank, 17% black liquor storage, 52% black liquor storage, and 64% black liquor storage.

The black liquor storage tank vent control system is not required per 40 CFR Part 63, Subpart S nor MEDEP Chapter 124. However, given the location and characteristics of these tanks, and the Mill's HVLC system, the Mill has chosen to control the black liquor storage tank vents in accordance with their continuing odor emission reduction program. These tanks are below the threshold for miscellaneous sources and therefore are not considered part of the HVLC system for purposes of MEDEP Chapter 124.

The saltcake mix tank and the precipitator mix tank are not subject to 40 CFR Part 63, Subpart S. The tank vents will be directed to the piping system installed for the control of the softwood brown stock washer system. They are subject to miscellaneous source requirements under MEDEP Chapter 124, effective July 1, 2007.

5. Knotter Vents

The knotter systems on the hardwood and softwood brown stock lines consist of the following equipment: primary knotters, stock chest, and shared backup knotter screen. These systems have low emissions (<0.1 lb HAP/ton ODP) and are therefore not required to have controls installed per 40 CFR Part 63, Section 63.433(a)(1)(ii)(A). These systems are also below the threshold for

miscellaneous sources and therefore are not considered part of the HVLC system for purposes of MEDEP Chapter 124. However, the Mill has chosen to control components of the hardwood and softwood knoter systems in accordance with their continuing odor emission reduction program.

6. Screen Vents

The screening system consists of the primary and secondary screens and the scalping screen. These vents have low emissions (<0.2 lb HAP/ton ODP) and are therefore not required to have controls installed per 40 CFR Part 63, Section (a)(1)(ii)(B). These systems are also below the threshold for miscellaneous sources and therefore are not considered part of the HVLC system for purposes of MEDEP Chapter 124. Therefore, these vents are not collected.

O. Closed Collection and Vent System Monitoring Provisions

The Mill is required by 40 CFR Part 63, §63.443(c) to enclose and vent to a closed-vent system the equipment systems listed in §63.443(a). The enclosures and closed-vent systems for pulping systems must also meet the requirements specified in §63.450.

Pursuant to 40 CFR Part 63, §63.453(m), the Mill has proposed alternative closed collection and vent system monitoring provisions. The following alternative monitoring provisions were approved by EPA in a letter dated July 16, 2001.

The Mill has demonstrated that unsafe conditions may be created in the inspection and monitoring of some enclosures and closed collection and vent system components as required in 40 CFR Part 63, §63.453(k) and (l). Therefore, for equipment required to be inspected per 40 CFR Part 63, §63.453(k) and (l), the Mill shall exempt any closed vent system, fixed roof cover, or enclosure from 30-day and annual inspection, monitoring and repair requirements if it is determined that personnel performing the inspection or repair would be exposed to an imminent or potential danger, or the equipment could not be inspected without elevating the inspection personnel more than 6 feet above a supported surface.

The site-specific monitoring plan must identify exempted equipment and describe how the equipment will be inspected and/or repaired during periods determined safe which must be at least once during each permit term.

Further, the Mill has requested a degree of flexibility in the frequency of inspections required per 40 CFR Part 63, §63.453(k) and (l). This is to allow the Mill to allocate dedicated resources to the inspection process and will not affect the stringency of the standard. As such, inspections in accordance with 40 CFR

Part 63, § 63.453(k) and (l) shall be performed once during each calendar month with at least 21 days elapsed time between inspections.

P. Condensate Collection System

The Mill has elected to demonstrate compliance with the pulping condensate collection option listed in 40 CFR Part 63, §63.446(c)(3). This option requires collection of pulping process condensates that contain a total HAP mass of 11.1 pounds per ton of oven-dry pulp for mills that perform bleaching.

The Mill has also elected to demonstrate compliance with the pulping condensate treatment option listed in 40 CFR Part 63, §63.446(e)(5) using a condensate stripping column. This option requires treatment of the pulping process condensates to ensure a 92% removal efficiency, remove a minimum of 10.2 pounds of HAP per ton of oven-dry pulp, or achieve a total HAP concentration of 330 ppm at the outlet of the control device.

Under paragraph 63.446(g), excess emissions from condensate collection or treatment requirements are not violations provided the total of excess emissions (including periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed 10%.

Q. Steam Stripper System

In 1998, in advance of the requirements of 40 CFR Part 63, Subpart S and in an effort to reduce emissions of malodorous compounds at the Rumford Mill, the Mill installed a Steam Stripper System to treat certain foul condensate streams generated by the mill's pulp manufacturing process system. The Steam Stripper System is comprised of the steam stripper, foul condensate tank, associated piping and ductwork. Effective April 17, 2001, the steam stripper system is subject to the requirements of 40 CFR Part 63, Subpart S.

The stripper is designed to receive foul condensate from the foul condensate storage tank which stores condensate collected from sources within the mill. The stripper removes TRS and VOCs from the foul condensate through volatilization by direct-contact heat transfer. The steam stripper generates an off-gas (SOGs) containing TRS and VOC. The Mill incinerates the SOGs in Power Boilers #3 or #5, or Cogen Boilers #6 or #7. In the boilers the TRS gases (from the SOGs) are oxidized to SO₂ which is in turn controlled by the wet scrubbers. The downtime allowances for collection and treatment of condensates are specified in 40 CFR Part 63.446 (g).

R. Bulk Handling Systems

The Mill operates the following commodity bulk handling and storage systems:

1. Number 15 Paper Machine Starch Silo #1
2. Number 15 Paper Machine Starch Silo #2
3. North Mill Starch Silo #1
4. North Mill Starch Silo #2
5. Lime Kiln Silo
6. River Bank (ETP) Lime Silo
7. Cogen Limestone Unloading
8. Farrington Mountain Ash Conditioning Facility Silo
9. Cogen Ash Silo

In order to minimize fugitive emissions, the Mill will follow an established Best Management Practice (BMP) Plan for all mill bulk handling unloading systems. The BMP shall be available to the Department upon request. For the bulk handling systems, the Mill shall:

1. Maintain the alarm systems in proper operating condition.
 2. Maintain all baghouses to achieve visible emissions no greater than 10% opacity on a six minute average basis, except for no more than one 6-minute block average in a one-hour period.
 3. Clean-up all spills within 24 hours of the occurrence of each spill.
 4. Inspect all unloading systems for leaks and malfunctions as described by the Mill's BMP Plan.
 5. Discontinue unloading until leaks and/or malfunctions are eliminated.
- [MEDEP Chapter 140, BPT]

S. Landfill Flare

The Mill operates a flare incineration system on the gas collection system at their landfill in Mexico, Maine. The flare incinerates methane and other gases that are generated by the decomposition of the landfill materials, and oxidizes entrained sulfur compounds.

The gases are collected from the gas collection system by a fan and then ignited by a propane fuel pilot. The flare is an enclosed flare system such that the flame is totally enclosed at the base of a cylindrical chimney. The operation of the flare is on an intermittent basis. When the collected landfill gases have attained a combustible concentration, the gases are incinerated until the concentration of the gases falls below combustible levels. The flare design guarantees an enclosed flame temperature between 1400 °F and 2000 °F and a destruction level for hydrocarbons of over 99%.

T. Groundwood Operations

The Mill operates mechanical groundwood operations. The VOC RACT determination for this equipment is summarized in Section III.G of this license.

U. Paper Machines and Pulp Dryer

The Mill operates four paper machines with on-line coaters. R-11, R-12, and R-15 paper machines contain Beloit Short Dwell Blade Coaters and steam dryers. R-10 contains a Voith Jet Coater and gas fired air flotation dryers. The Pulp Dryer contains steam dryers and no coaters. All coatings are aqueous based which contain minimal levels of VOCs, if any. The VOC content of coatings is below the RACT limits of 2.9 lb/gallon. The coaters are subject to MEDEP Chapter 123, Paper Coating Regulation. The Mill has certified that all of the coatings used on the coaters have an as applied VOC content less than 2.9 pounds per gallons of coating. The Department has previously determined through the rulemaking of Chapter 134 that additional controls are not feasible for paper machines. EPA has also reached this conclusion during the course of development of MACT requirements for paper machines. Paper machines and on-line coaters and dryers are exempt from Chapter 134 VOC RACT. The on-line coaters are subject to the applicable requirements of the National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ with a compliance date of December 5, 2005.

Periodic Monitoring

The coaters operated at the Mill meet the emission limits set forth in Chapter 123 as amended on October 2, 2000 by using only coatings with less than 2.9 pounds of VOC per gallon. As such, the Mill shall keep monthly records as required by Chapter 123. VOC content and emissions shall be based on EPA Method 24 as required in Chapter 123 of the Department's regulations.

V. Other Emission Sources

In 1998 the Mill installed four air flotation dryers on the paper machine designated R-10 to dry coating. Two of the dryers are rated at 6.4 MMBtu/hr and two at 8.05 MMBtu/hr and they are licensed to burn either propane or natural gas.

The Mill also operates the following fuel burning units with a maximum heat input capacity of less than 1.0 MMBtu/hr each that are considered insignificant activities. These units are a propane fired auxiliary lime kiln drive, the Swift River pump house heating furnace, and a lower gatehouse heating furnace.

In addition, the Mill operates several Emergency Diesels including the Cogen Emergency Generator, the R15 Emergency Generator, the Mill emergency Generator and the Diesel Fire Pump. The Mill has accepted a license restriction on the hours of operation for each of the Emergency Diesels to maintain the NO_x emissions under 10 ton/year and therefore exempt from any requirements for NO_x emissions control as specified by MEDEP Chapter 138.

The Mill operates a 20,000 gallon methanol storage tank that is subject to the recordkeeping requirements of 40 CFR Part 60, Subpart Kb.

III. VOC RACT

The following summarizes the Mill's VOC RACT analysis that was submitted by the Mill in 1994 pursuant to Chapter 134 and the Department's findings as set forth in Air License # A-214-71-S-A/R:

A. Bleach Plant

Pursuant to Chapter 122, the Mill is required to collect emissions from the Bleach Plant and have the chlorine and chlorine dioxide emissions controlled by the Bleach Plant Scrubber System. Total Bleach Plant chlorine and chlorine dioxide emissions after control by the wet scrubber systems are each limited to 3.0 lb/hr. As a result, some of the VOC emissions from the Bleach Plant are also collected and controlled by the Bleach Plant Scrubber System. In addition, the Mill has eliminated the use of sodium hypochlorite as a primary bleaching agent.

The control of emissions from the Bleach Plant by the Bleach Plant Scrubber System which complies with Chapter 122 for the control of chlorine and chlorine dioxide emissions and the discontinued use of sodium hypochlorite as a primary bleaching agent was determined to be VOC RACT.

B. Waste Water Treatment Facility

The Mill's wastewater treatment facility is regulated under a National Pollution Discharge Elimination System (NPDES) permit and a State of Maine Waste Discharge License. The operational practice of the treatment facility under these regulatory programs constitutes control of VOC emissions and thus was determined to be meeting VOC RACT.

C. Pulp Stock Washer Systems and Pulp Liquor Storage Tanks

During the development of Chapter 134, the Paper Industry Information Office performed a VOC RACT analysis on various VOC sources from a representative

paper mill in Maine. From that analysis it was determined that the control of VOCs from the pulping area (which contain pulp stock washers) would have an adverse economic impact and thus VOC emissions from the Pulp Stock Washer Systems, were meeting VOC RACT as of the May 31, 1995 compliance deadline under Chapter 134.

D. Digesters and Multiple Effect Evaporators

The Mill is required by MEDEP Chapter 124 to collect emissions from the Digesters and the Multiple Effect Evaporators. The TRS emissions from these sources are to be collected and incinerated within the Lime Kiln, Power Boilers #3 or #5, or Cogen boilers #6 & #7. As a result, VOC emissions from the Digesters and the Multiple Effect Evaporators are also collected and incinerated.

The control of VOC emissions from the Digesters and the Multiple Effect Evaporators by the Lime Kiln, Power Boiler #3 or #5, or Cogen Boilers #6 & #7 which complies with Chapter 124 for the control of TRS emissions were determined to be meeting VOC RACT.

E. Smelt Tank C

The Mill is required by MEDEP Chapter 124 to meet a TRS emission limit of 0.033 lb/ton black liquor solids as H₂S from Smelt Tank C. In addition, the Mill is required by license condition to control particulate emissions from Smelt Tank C by a wet scrubber system. As a result, some of the VOC emissions from the Smelt Tank C are also controlled. The limit on TRS emissions pursuant to MEDEP Chapter 124 and the control of particulate emissions by a wet scrubber system was determined to be VOC RACT.

F. Lime Kiln

The Mill is required per MEDEP Chapter 124 to maintain 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 a result, VOC emissions from the Lime Kiln are also controlled.

The control of VOC emissions from the Lime Kiln by maintaining adequate combustion conditions to comply with MEDEP Chapter 124 for the control of TRS emissions were determined to be VOC RACT.

G. Groundwood Operations

The Mill has identified that their groundwood operations are not exempt pursuant to Section 1(C) or eligible to achieve compliance through Section Option (D) of

Section 3(A) of MEDEP Chapter 134, therefore were subject to an alternative VOC RACT analysis as specified by Section 3(A)(3) of MEDEP Chapter 134.

VOC emissions such as methanol, terpenes, pinenes, acetone, etc. are released from groundwood operations as the result of the heat that is generated by friction between the grinding stone and the pulpwood.

Since there is very little published VOC emission factor data from groundwood operations, emission factors were developed based on VOC source tests conducted at other similar facilities. The Mill has estimated the VOC emissions to be approximately 1.1 lb VOC /ADTP, which equates to 36 tons per year based on representative groundwood pulp production rates.

Combustion of the VOCs within the Mill's existing boilers was not considered to be feasible due to the length of the ductwork which would be needed in transporting the gases from the groundwood operations to the boilers. The distance between the groundwood mill and the boilers is approximately a quarter of a mile.

The Department therefore concluded that there are no technically or economically feasible control options that are capable of reducing the VOC emissions from the groundwood operations and thus the equipment and operations were receiving RACT for VOC emissions.

IV. NO_x RACT

The following summarizes the Department's NO_x RACT determinations as set forth in Air License # A-214-71-S-A/R:

A. Boilers #3 and #5

Boilers #3 and #5 have low NO_x burner systems installed in addition to flue gas circulation capabilities. The Mill has proposed that the current control systems for Boilers #3 and #5, which were determined as BACT in the Air Emission License Amendment A-214-71-O-A, meet the NO_x RACT requirements of Chapter 138. In addition, Boilers #3 and #5 currently have CEMs which monitor NO_x emissions. The Department has determined that the current controls and emission limits on Boilers #3 and #5 meet NO_x RACT.

B. Cogen Boilers #6 and #7

The Mill proposed that the current circulating fluidized bed technology employed by the Cogen Boilers #6 and #7 with effective process control, which were determined as BACT in the Air Emission License Amendment A-214-71-O-A,

are inherently low NO_x systems and therefore meet the definition of an equivalent strategy as required by Chapter 138. In addition, Boilers #6 and #7 have CEMs which monitor NO_x. The Department has determined that the current controls and emission limits on Boilers #6 and #7 meet NO_x RACT.

C. Recovery Boiler C and Lime Kiln

The Mill proposed NO_x RACT for Recovery Boiler C to be the installation of the NO_x CEMS and compliance with the proposed limit (converted to a dry basis CEM system) on a 24 hour block average basis as specified by Chapter 138. The Mill proposed NO_x RACT for the Lime Kiln to be compliance with the proposed limit and demonstration by a stack test as specified by Chapter 138 and this license. The Department has determined that the current controls and emission limits for Recovery Boiler C and the Lime Kiln meet NO_x RACT.

D. Diesel Fire Pump

The Mill accepted a license restriction on the hours of operation for the Diesel Fire Pump to maintain the NO_x emissions under 10 tons per year and thus this equipment is exempt from any requirements for NO_x emissions control as specified by Chapter 138.

V. Facility Emissions

The following is the sum of all emission limits in this license (for all equipment in Section I.B) which is used to calculate the license fees.

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

| | PM | PM ₁₀ | SO ₂ | NO _x | CO | VOC | Cl ₂ | ClO ₂ |
|------------------|--------------|------------------|-----------------|-----------------|----------------|--------------|-----------------|------------------|
| Power Boiler #3 | 65.7 | 65.7 | 341.6 | 525.6 | 262.8 | 19.7 | - | - |
| Power Boiler #5 | 65.7 | 65.7 | 341.6 | 525.6 | 262.8 | 19.7 | - | - |
| Power Boiler #6 | 82.8 | 82.8 | 772.6 | 1,655.6 | 1,090.0 | 22.1 | - | - |
| Power Boiler #7 | 82.8 | 82.8 | 772.6 | 1,655.6 | 1,090.0 | 22.1 | - | - |
| Lime Kiln | 105.1 | 105.1 | 100.7 | 227.8 | 170.8 | 8.8 | - | - |
| Recovery Boiler | 379.7 | 284.7 | 903.6 | 941.7 | 972.4 | 16.2 | - | - |
| Smelt Tank C | 70.1 | 69.2 | 24.1 | - | - | - | - | - |
| Dryers | 15.2 | 15.2 | 0.1 | 19.6 | 2.7 | 0.7 | - | - |
| Cogen Emerg Gen | 0.1 | 0.1 | 0.1 | 1.6 | 0.4 | 0.1 | - | - |
| R15 Emerg Gen | 0.1 | 0.1 | 0.1 | 1.4 | 0.3 | 0.1 | - | - |
| Mill Emerg Gen | 0.2 | 0.2 | 0.1 | 4.4 | 1.2 | 0.1 | - | - |
| Fire Pump | 0.1 | 0.1 | 0.1 | 2.5 | 0.5 | 0.2 | - | - |
| Bleach Plant | - | - | - | - | - | - | 13.1 | 13.1 |
| Total TPY | 867.6 | 771.7 | 3,257.3 | 5,534.4 | 3,853.9 | 109.8 | 13.1 | 13.1 |

VI. AIR QUALITY ANALYSIS

The Mill previously submitted an ambient air quality analysis. All air quality modeling studies have incorporated maximum short-term and maximum annual emission rates from the various sources of emissions at the Mill and demonstrated 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 Initial Part 70 License.

ORDER

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

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

The Department hereby grants the Part 70 License A-214-70-A-I pursuant to MEDEP Chapter 140 and the pre-construction 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 the Mill pursuant to the Department's pre-construction 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 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 emission 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) 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.
- (4) 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**
 - (5) The licensee shall pay the annual air emissions license fee to the Department, calculated pursuant to Title 38 MRSA §353.
 - (6) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege.
 - (7) 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**
 - (8) The licensee shall maintain sufficient records, to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license.
 - (9) 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.
 - (10) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.
 - (11) 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.

- (12) 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 emissions testing; and
 - (c) submit a written report to the Department within thirty (30) days from the date of test completion.

Enforceable by State-only

- (13) 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 a interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

- (14) 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.
- (15) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
- (a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - (b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

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

- (16) 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.
- (17) 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. The licensee shall notify the Department within two (2) days or the next working day, whichever is later, of such occasions

- and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation.
- (18) 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.
- (19) 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.
- (20) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequent if specified in the applicable requirement 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;
- (21) 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 the 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 the 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 emission standards or other terms of 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.

- (22) 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.

SPECIAL CONDITIONS

(23) Permit Shield for Non-Applicable Requirements

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated August 28, 1996.

| | SOURCE | CITATION | DESCRIPTION | BASIS FOR DETERMINATION |
|---|------------------------------------|-------------------------|--------------------------------------------------------|-----------------------------------------------------------------------------|
| A | Facility | Chapter 107 | Sulfur Dioxide Standards for Sulfite Pulp Mills | Facility is not a sulfite pulp mill |
| B | Facility | Chapter 111 | Petroleum Liquid Vapor Storage Control | Fuel oil stored at the facility has a vapor pressure below threshold limits |
| C | Lime Kiln | Chapter 134 | VOC RACT | Combustion Source |
| D | Boilers #6 & #7 | 40 CFR 60 Subpart Dc | NSPS for Steam Generating Units less than 100 MMBtu/hr | #6 & #7 are greater than 100 MMBtu/hr |
| E | Recovery Boiler C | 40 CFR 60 Subpart D | NSPS for Steam Generating Units | RBC is not fossil fuel fired |
| F | Boilers #3, #5, #6, #7, C-Recovery | 40 CFR 60 Subpart Da | NSPS for Electric Utility Steam Generating Units | These boilers do not meet the definition of an electric utility |
| G | Boilers #3, #5, #6, #7 | 40 CFR 60 Subpart E | NSPS for Incinerators | Units do not burn solid waste consisting of more than 50% municipal waste |
| H | Coal Handling | 40 CFR 60 Subpart Y | NSPS for Coal Preparation Plants | Facility is not a coal preparation plant |
| I | Facility | 40 CFR 60 Subpart RR | Pressure Sensitive Tape and Label Surface Coating | No applicable sources at this facility |
| J | Facility | 40 CFR 61 Subpart E | National Emission Standards for Mercury | Below mercury threshold |
| K | Boilers #3, #5, #6, #7 | 40 CFR Parts 72 thru 78 | EPA Acid Rain Program | Facility is not an electric utility unit. |

(24) Boilers #3 and #5

- A. The Mill is licensed to fire #6 fuel oil, specification and off-specification oil, natural gas, Non Condensable Gases (NCGs), HVLCs, and Stripper Off Gases (SOGs) in each boiler. [MEDEP Chapter 140, BPT]
- B. The Mill shall keep records of the sulfur content for all fuel oil fired in Boilers #3 and #5. [MEDEP Chapter 140, BPT]
- C. Boiler #3 and #5 shall each not exceed the following emission limits:

| Pollutant | Ib/MMBtu (each boiler) | Fuel | Ave Time | Compliance Determined By |
|------------------|-------------------------------|--------------------------------------------------------|-----------------|---------------------------------------|
| PM | 0.05 | any combination of oil, natural gas, NCGs, SOGs, HVLCs | -- | Stack Test Performed Every Other Year |
| | 0.08 | oil with any two or more of NCGs, SOGs, HVLC | | Stack Testing Upon Request |
| | 0.03 | natural gas firing only | | Stack Testing Upon Request |
| PM ₁₀ | 0.05 | any combination of oil, natural gas, NCGs, SOGs, HVLCs | -- | Stack Testing Upon Request |
| | 0.08 | oil with any two or more of NCGs, SOGs, HVLC | | |
| | 0.03 | natural gas firing only | | |
| SO ₂ | 0.26 | any combination | 24-hr block | CEMS |
| | 0.01 | natural gas firing only | | |
| NO _x | 0.40 | any combination | 30-day rolling | CEMS |
| | 0.20 | natural gas firing only | | |
| CO | 0.20 | any combination | -- | Stack Testing Upon Request |
| VOC | 0.015 | any combination | -- | Stack Testing Upon Request |

| Pollutant | lb/hour (each boiler) | Fuel | Ave Time | Compliance Determined By |
|------------------|--------------------------|--------------------------------------------------------|----------------|-----------------------------|
| PM | 15.0 | any combination of oil, natural gas, NCGs, SOGs, HVLCs | -- | Stack Test Every Other Year |
| | 24.0 | oil with any two or more of NCGs, SOGs, HVLCs | | |
| PM ₁₀ | 15.0 | any combination of oil, natural gas, NCGs, SOGs, HVLCs | -- | Stack Test Every Other Year |
| | 24.0 | oil with any two or more NCGs, SOGs, HVLCs | | |
| SO ₂ | 78.0 ^{a,b} | any combo | 3-hr block | CEMS |
| NO _x | 120.0 | any combo | 30-day rolling | CEMS |
| CO | 60.0 | any combo | -- | Stack Testing Upon Request |
| VOC | 4.5 | any combo | -- | Stack Testing Upon Request |

- a. When Boiler #6 and/or #7 is firing only fuel oil or performing a gravimetric calibration and SO₂ emissions are above 250.0 lb/hr, SO₂ emissions from the common stack for Boilers #3 and #5 shall be limited to a total of 60.0 lb/hr. The Mill shall keep records of the dates and times of all gravimetric calibrations and the date and time of any firing of only fuel oil in Boilers #6 and #7.
 - b. When the Recovery Boiler C is firing only fuel oil and SO₂ emissions are above 206.3, SO₂ emissions from the common stack for Boilers #3 and #5 shall be limited to a total of 60.0 lb/hr. The Mill shall keep records of the date and time of any firing of only fuel oil in Recovery Boiler C.
 [MEDEP Chapter 140, BPT]
- D. The Mill shall operate the boilers such that the visible emissions from the combined stack does not exceed 20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. Compliance shall be demonstrated by testing in accordance with 40 CFR Part 60, Appendix A, Method 9 upon request by the Department.
 [MEDEP Chapter 140, BPT]

- E. The Mill shall maintain records of annual #6 fuel oil use indicating the quantity of fuel oil consumed (gallons) and the percent (%) sulfur content of the fuel oil by weight demonstrated by purchase records from the supplier. The Mill shall maintain records of annual natural gas fuel use indicating the quantity of fuel consumed (MMscf). [MEDEP Chapter 140, BPT]
- F. Compliance with the lb/MMBtu particulate matter limits shall be demonstrated by stack testing performed once every two years. [MEDEP Chapter 140, BPT]
- G. Compliance with the NO_x lb/MMBtu emission limits shall be on a 30-day rolling average basis demonstrated by means of a CEMS on the combined stack of Power Boiler #3 and #5. Compliance with the NO_x lb/hr emission limits shall be on a 30-day rolling average basis demonstrated by means of data from a CEMS (EPA Method 19). [MEDEP Chapter 138, NO_x RACT]
- H. Compliance with the SO₂ lb/hr and lb/MMBtu emission limits shall be on a 3-hour and 24-hour block average basis, respectively, demonstrated by means of a CEMS on the combined stack of Power Boilers #3 and #5. [MEDEP Chapter 140, BPT]
- I. The Mill shall continue to operate the low NO_x burners and the flue gas recirculation system in Boilers #3 and #5 and shall operate the Venturi Scrubber System on the emissions from Boilers #3 and #5. Flue gas recirculation system downtime shall not be considered pollution control equipment down time if it does not exceed 5% of boiler operating time per quarter (excluding downtime for soot blows). The Mill need not operate the associated Venturi Scrubber System for those periods of time when Boiler #3 and/or #5 is firing natural gas only. [MEDEP Chapter 140, BPT]
- J. The Mill shall operate the monitor and record the following as specified, for Boilers #3 and #5:

| Parameter for each boiler | Monitor | Record |
|---------------------------------------------|---------------------|---------------------|
| venturi pressure drop | continuously | continuously |
| media solids | once every 24 hours | once every 24 hours |
| fuel oil firing rate | continuously | continuously |
| natural gas firing rate | continuously | continuously |
| firing duration of NCGs, HVLCs, and/or SOGs | continuously | continuously |

[MEDEP Chapter 140, BPT]

(25) Cogen Boilers #6 and #7

A. The Mill shall operate each boiler such that the following firing rates are not exceeded, firing a combination of fuels including coal with a maximum sulfur content not to exceed 3.5% by weight, biomass (including wood waste, creosote treated wood chips, mill waste treatment sludge, and waste papers), Tire Derived Fuel (TDF), Delayed Petroleum Coke (DPC), Lime Kiln Rejects, HVLCs, SOGs, NCGs, Oil (including Specification Used oil, Off-Specification Used oil or fuel oil with a maximum sulfur content not to exceed 2.5% by weight), and natural gas:

| <u>Fuel</u> | <u>Max Heat Input (MMBtu/hr)</u> |
|--------------|-------------------------------------------------------------------------------------|
| Combination: | 630 – short term (24 hour block avg.) 610 – annual (12 month rolling avg.) |

[MEDEP Chapter 140, BPT]

B. The sulfur content of the fuel oil fired in Boiler #6 or Boiler #7 shall not exceed 2.5% by weight demonstrated by purchase records from the supplier. The sulfur content of the coal fired in Boiler #6 or Boiler #7 shall not exceed 3.5% by weight demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT]

C. Boilers #6 and #7 shall each not exceed the following emission limits:

| Pollutant | lb/MMBtu (each boiler) | Fuel | Ave Time | Compliance Determined By |
|------------------|---------------------------|---------------------------------------|-------------|--------------------------------------|
| PM | 0.03 | any combination | -- | Stack Testing Every Other Year |
| PM ₁₀ | 0.03 | any combination | -- | Stack Testing Upon Request |
| SO ₂ | 0.28 ^a | any combination | 24-hr block | CEMS |
| | 0.32 ^a | for coal, DPC, or TDF contribution | | |
| NO _x | 0.60 | any combination | 24-hr block | CEMS |
| | 0.10 | natural gas only | | |
| | 0.30 | oil only | | |
| CO | 0.15 | coal, DPC, or TDF; or | -- | Stack Testing Upon Request |
| | 0.50 | biomass, or natural gas; | | |
| | 0.03 | oil | | |
| VOC | 0.008 | any combination | -- | Stack Testing Upon Request |

- a. When Boiler #6 and/or #7 is firing only fuel oil or performing a gravimetric calibration, the monitored SO₂ lb/MMBtu emissions during that period shall not be included in determining the 24-hr block average SO₂ lb/MMBtu emission rate. The Mill shall keep records of the dates and times of all gravimetric calibrations and the date and time of any firing of only fuel oil in Boilers #6 and #7.

| Pollutant | lb/hour (each boiler) | Ave Time | Compliance Determined By |
|------------------|--------------------------|-------------|-----------------------------------|
| PM | 18.9 | -- | Stack Testing Every Other Year |
| PM ₁₀ | 18.9 | -- | Stack Testing Upon Request |
| SO ₂ | 176.4 ^{b,c} | 3-hr block | CEMS |
| NO _x | 378.0 | 24-hr block | CEMS |
| CO | 248.85 | -- | Stack Testing Upon Request |
| VOC | 5.04 | -- | Stack Testing Upon Request |

- b. When Boiler #6 and/or #7 is firing only fuel oil or performing a gravimetric calibration, SO₂ emissions from the common stack for Boilers #6 and #7 shall be limited to a total of 500.0 lb/hr. The Mill shall keep records of the dates and times of all gravimetric calibrations and the date and time of any firing of only fuel oil in Boilers #6 and #7.
- c. When the Recovery Boiler C is firing only fuel oil and emissions are above 206.3 lb/hr, SO₂ emissions from the common stack for Boilers #6 and #7 shall be limited to a total of 250.0 lb/hr. The Mill shall keep records of the date and time of any firing of only fuel oil in Recovery Boiler C.

[MEDEP Chapter 140, BPT]

- D. Visible emissions from the combined stack for Boilers #6 and #7 shall not exceed 20% on a 6 minute average, except for one period per hour of not more than 27% opacity. This opacity standard shall apply at all times, except during periods of startup or shutdown. During periods of startup or shutdown visible emissions shall comply with Condition (26), as specified in this license. Compliance with the opacity limit shall be demonstrated by means of a COMS on the combined stack of Boiler #6 and #7. [MEDEP Chapter 140, BPT]
- E. NFPA code (Section 4.6.2.5) requires that the electrostatic precipitator trip on interlock with a boiler Master Fuel Trip (MFT). The code requirement is intended to prevent ignition of potentially explosive gases that may be present in the precipitator chamber following a boiler trip. The MFT requirement may result in unavoidable opacity exceedances. Therefore, when an affected unit experiences a MFT that is not the result of operator error or poor maintenance, , it is a result of a malfunction meeting the definition of that

term in 40 CFR Part 60.2, and therefore excess opacity during such events are not violations under the authority of 40 C.F.R. Part 60.43b(g).

- F. Compliance with the lb/MMBtu particulate matter limits shall be demonstrated by stack testing performed once every two years. [MEDEP Chapter 140, BPT]
- G. Compliance with the SO₂ lb/hr and lb/MMBtu emission limits shall be on a 3-hr block and 24-hr block average basis, respectively, demonstrated by means of a CEMS on the combined stack of Boiler #6 and #7. [MEDEP Chapter 140, BPT]
- H. Compliance with the NO_x lb/hr and lb/MMBtu emission limits shall be on a 24-hr block average basis, demonstrated by means of a CEMS on the combined stack of Boiler #6 and #7. [MEDEP Chapter 138, NO_x RACT]
- I. The Mill shall continue to operate the Multiple Cyclones and the Electrostatic Precipitator (ESP) on the emissions from Boilers #6 and #7. [MEDEP Chapter 140, BPT]
- J. The circulating limestone bed used in SO₂ control must remove at least 90% of the sulfur from the coal, tire derived fuel, delayed petroleum coke, and oil used. The averaging time for the 90% efficiency shall be a 30-day calculated rolling average. [MEDEP Chapter 140, BPT]
- K. When firing multiple fuels the NO_x, CO, SO₂, and VOC emission rates for Boilers #6 and #7 shall be determined by a weighted average on a Btu basis. [MEDEP Chapter 140, BPT]
- L. The Mill shall operate the monitor and record the following as specified, for Boilers #6 and #7:

| Item to be Monitored | Monitor | Record |
|-----------------------------|----------------|-----------------|
| ESP Voltage | continuously | every half hour |
| ESP Amperage | continuously | every half hour |

[MEDEP Chapter 140, BPT]

- M. The entire biomass conveying system shall be enclosed. [MEDEP Chapter 140, BPT]
- N. The coal railcars shall be unloaded within an unloading shed to a below grade receiving hopper equipped with a dust collection system sufficient to prevent visible emissions greater than 10% opacity. The coal shall be handled within

an enclosed system and there shall be no venting of the coal handling system other than via baghouses. Visible emissions from the baghouses shall be limited to no more than 10% opacity on a six minute average basis except for no more than one 6-minute block average per hour. [MEDEP Chapter 140, BPT]

- O. The ash (bottom and fly) transfer for Boilers #6 and #7 shall be accomplished such that no visible emissions result greater than 10% opacity, on a six minute average basis, from either the loading of the ash by-product into trucks or trailers or the transport of the ash by-product except for no more than one 6-minute block average per hour. [MEDEP Chapter 140, BPT]
 - P. The Mill shall operate, at a minimum, the number of ESP fields for which compliance with its licensed particulate emission limits has been demonstrated. Upon written notification to the Department, and in accordance with the Bureau of Air Quality Air Emission Compliance Test Protocol, the Mill may perform additional particulate emission testing to demonstrate compliance with alternative operating scenarios, but under no circumstances shall the Mill be relieved of its obligation to meet its licensed emission limits. [MEDEP Chapter 140, BPT]
 - Q. Boilers #6 and #7 are both subject to 40 CFR Part 60 Subpart A and Subpart Db for particulate matter, SO₂, opacity, and NO_x and the Mill shall comply with the notification and recordkeeping requirements of 40 CFR Part 60.7. [MEDEP Chapter 140, BPT]
- (26) Visible emissions from the combined stack for Boilers #6 and #7 shall be deemed to be in compliance with the visible emission requirements of this license for a certain period of time, if the Department has determined that that period of time, is a startup or shutdown of Boiler #6 and/or #7, and the following requirements are met:
- A. For each period that is a startup or shutdown of Boiler #6 and/or #7, the Mill shall:
 - 1. maintain records of opacities which are greater than 20% on a six minute average except for one 6 minute period per hour of not more than 27% opacity; and
 - 2. report each of these periods in the quarterly report. These periods shall not be reported in the excess emissions section of the quarterly report.
 - B. In the event when only one Boiler #6 or #7 is in the process of startup or shutdown and the other is under "normal" operation, the Mill shall

continuously monitor and record once every half hour, the following surrogate parameters values indicative of boiler performance:

1. boiler air/fuel ratio
2. Boiler combustion O₂ trim control
3. the operating ESP T.R. Set voltage and amp

During the startup or shutdown period, operation of the other boiler within the normal range of variation for the above parameters shall constitute compliance with the visible emission requirements of this license. Upon request from the Department, the Mill shall submit copies of the records for these parameters.

- C. The identified period of opacity allowance of Boiler #6 and/or #7:
1. shall not exceed a maximum period of 36 hours per boiler for startups after boiler conditions were available for internal maintenance
 2. shall not exceed a maximum period of 24 hours per boiler for all other startups or shutdowns
 3. shall begin upon the first 6 minute value that is recorded to be in excess of 20% opacity on a six minute average except for one 6 minute period per hour of not more than 27% opacity.
- D. When Boiler #6 and/or #7 is determined to have completed shutdown operations and is available for internal maintenance, visible emissions from the combined stack shall not exceed 60% opacity on a six minute average. The Mill shall maintain the records as described by Condition (26)A and B. above, in the event when only one Boiler #6 or #7 is down and the other is under "normal" operation.
[MEDEP Chapter 140, BPT]

(27) Lime Kiln

- A. The lime kiln shall be limited to a maximum fuel oil sulfur content not to exceed 2.0% by weight when there is no lime within the kiln and 2.5% by weight when there is lime within the kiln. The lime kiln is licensed to fire natural gas, fuel oil, and NCGs. [MEDEP Chapter 140, BPT]

B. The lime kiln shall not exceed the following emission limits:

| Pollutant | ppmv | Ave Time | lb/hour |
|------------------|-------------|-----------------|----------------|
| PM | -- | | 24.0 |
| PM ₁₀ | -- | | 24.0 |
| SO ₂ | -- | | 23.0 |
| NO _x | 120 | | 52.0 |
| CO | -- | | 39.0 |
| VOC | -- | | 2.0 |
| TRS | 8.0 | 12-hr block | -- |

[MEDEP Chapter 140, BPT]

C. The lime kiln shall not exceed a limit of 0.067 grains/dscf corrected to 10% O₂ for PM. Compliance with the particulate matter limits shall be demonstrated by stack testing performed once every two years. [MEDEP Chapter 140, BPT]

D. The lime kiln shall meet a limit of 0.064 grains/dscf corrected to 10% O₂ for PM in accordance with 40 CFR Part 63, Subpart MM by the date required in Section 63.863(a). [40 CFR Part 63, Subpart MM]

E. The lime kiln shall not exceed a NO_x limit of 120 ppmv corrected to 10% O₂ on a wet basis. Compliance with the NO_x limits shall be demonstrated by stack testing performed once every two years in accordance with 40 CFR Part 60, Appendix A. [MEDEP Chapter 138, NO_x RACT]

F. The lime kiln shall not exceed a TRS limit of 8.0 ppmv corrected to 10% O₂ on a dry basis, measured as H₂S. Compliance with the TRS ppmv emission limit shall be determined on a 12-hr block average basis, as described in 40 CFR Part 60, Subpart BB and demonstrated by means of a CEMS on the lime kiln. The first four twelve (12)-hour block averages in a quarter which exceed either license limits or the emission standards of DEP Chapter 124 Section 3(K) are not in violation of Chapter 124. [MEDEP Chapter 140, BPT]

G. The Mill shall continuously operate the Scrubber System on the emissions from the lime kiln. [MEDEP Chapter 140, BPT]

H. The Mill shall monitor and record the following for the lime kiln:

| Parameter | Monitor | Record |
|--------------------------|---------------------|---------------------|
| scrubber media flowrate | continuously | once every 8 hours |
| scrubber media solids | once every 24 hours | once every 24 hours |
| NCGs combustion duration | continuously | continuously |

[MEDEP Chapter 140, BPT]

- I. The Mill is subject to and shall comply with the requirements of 40 CFR Part 60, Subpart A and Subpart BB for the lime kiln. [40 CFR Part 60, Subpart BB]
- J. The Mill is subject to and shall comply with the requirements of 40 CFR Part 63, Subpart A and Subpart MM for the lime kiln by the dates required by that Subpart. [40 CFR Part 63, Subpart MM]

(28) Recovery Boiler C

A. Recovery Boiler C shall be limited to a maximum fuel oil sulfur content not to exceed 2.0% by weight when there is no smelt within the boiler and 2.5% by weight when there is smelt within the boiler demonstrated by purchase records from the supplier. Recovery Boiler C is also licensed to fire natural gas. [MEDEP Chapter 140, BPT]

B. Recovery Boiler C shall not exceed the following emission limits:

| Pollutant | ppmv | Ave Time | lb/hour | Ave Time |
|------------------|------------------|----------------|----------------------|-------------|
| PM | -- | | 86.7 | |
| PM ₁₀ | -- | | 65.0 | |
| SO ₂ | 100 ^c | 30-day rolling | 206.3 ^{a,b} | 3-hr block |
| NO _x | 110 | 24-hr block | 215.0 | 24-hr block |
| CO | -- | | 222.0 | |
| VOC | -- | | 3.7 | |
| TRS | 5 | 12-hr block | -- | |

- a. When Boiler #6 and/or #7 are firing only fuel oil or performing a gravimetric calibration, Recovery Boiler C shall be limited to 206.3 lb/hr of SO₂ emissions. The Mill shall keep records of the dates and times of all gravimetric calibrations and the date and time of any firing of only fuel oil in Boilers #6 and #7.

- b. When the Recovery Boiler C is firing only fuel oil, Recovery Boiler C shall be limited to 650.0 lb/hr of SO₂ emissions on a weighted 3-hr block basis. The Mill shall keep records of the date and time of any firing of only fuel oil in Recovery Boiler C.
- c. When the Recovery Boiler C 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.

[MEDEP Chapter 140, BPT]

- C. Recovery Boiler C shall not exceed a particulate limit of 0.044 grains/dscf corrected to 8% O₂ for PM. [40 CFR Part 60, Subpart BB]
- D. Compliance with the particulate matter limits shall be demonstrated by stack testing performed once every two years. [MEDEP Chapter 140, BPT]
- E. Recovery Boiler C shall not exceed a NO_x limit of 110 ppmv corrected to 8% O₂ on a dry basis. Compliance with the NO_x ppmv and lb/hr emission limit shall be on a 24-hr block average basis, demonstrated by means of a CEMS on the Recovery Boiler C stack. Periods of startup, shutdown, equipment malfunction, and fuel switching shall not be included in determining 24-hour daily block arithmetic average emission rates provided that operating records are available to demonstrate that the facility was being operated to minimize emissions. [MEDEP Chapter 138, NO_x RACT]
- F. Recovery Boiler C shall not exceed a SO₂ limit of 100 ppmv corrected to 8% O₂ on a dry basis. Compliance with the SO₂ lb/hr and ppmv emission limits shall be on a 3-hr block and 30-day rolling average basis, respectively, demonstrated by means of a CEMS on the Recovery Boiler C stack. [MEDEP Chapter 140, BPT]
- G. Recovery Boiler C shall not exceed a TRS limit of 5 ppmv corrected to 8% O₂ on a dry basis, measured as H₂S. Compliance with the TRS ppmv emission limit shall be determined on a 12-hr block average basis, as described in 40 CFR Part 60, Subpart BB and demonstrated by means of a CEMS on the Recovery Boiler C stack. The first two twelve (12)-hour block averages in a quarter which exceed either license limits or the emission standards of Section 3(H) or 3(I) of DEP Chapter 124 are not violations of chapter 124. [MEDEP Chapter 124, TRS Control and 40 CFR Part 60, Subpart BB]
- H. Except for periods of maintenance or shutdown, the Mill shall operate Recovery Boiler C such that the visible emissions from the stack do not exceed 30% opacity on a six (6) minute block average basis except for no

more than one six minute block average in a 3-hour period.
[MEDEP Chapter 101, Visible Emissions]

When maintenance is being performed on either precipitator chamber, or when Recovery Boiler C has completed shutdown operations, visible emissions from the stack shall not exceed 60% opacity on a six minute average.

- I. Beginning March 13, 2004, the Mill is required to implement corrective action, as specified in the startup, shutdown, and malfunction plan prepared for each unit under 40 CFR 63.866(a), when the average of ten (10) consecutive six (6) minute block averages results in a measurement greater than 20 percent opacity. [MEDEP Chapter 140, BPT]
- J. Recovery Boiler C shall not exceed an annual capacity factor for oil of 10%. [MEDEP Chapter 140, BPT]
- K. The Mill shall continue to operate the Electrostatic Precipitator on the emissions from Recovery Boiler C. [MEDEP Chapter 140, BPT]
- L. The Mill shall monitor and record the following as specified, for Recovery Boiler C:

| Parameter | Monitor | Record |
|----------------------------|---------------------|---------------------|
| black liquor firing rate | continuously | continuously |
| virgin black liquor solids | once every 24 hours | once every 24 hours |

[MEDEP Chapter 140, BPT]

- M. The Mill is subject to and shall comply with the requirements of 40 CFR Part 60, Subpart A and Subpart BB for Recovery Boiler C. [40 CFR Part 60, Subpart BB]
- N. By March 13, 2004 the Mill shall comply with the requirements of 40 CFR Part 63, Subpart A and Subpart MM for Recovery Boiler C. [40 CFR Part 63, Subpart MM]

(29) Smelt Tank C

A. The smelt tank C shall not exceed the following emission limits:

| Pollutant | lb/ton BLS | lb/hour |
|------------------|------------|---------|
| PM | 0.192 | 16.0 |
| PM ₁₀ | 0.190 | 15.8 |
| SO ₂ | 0.067 | 5.5 |
| TRS ^a | 0.033 | -- |

a. TRS shall be measured as H₂S.
 [MEDEP Chapter 140, BPT]

B. Compliance with the particulate matter limits shall be demonstrated by stack testing performed once every two years. [MEDEP Chapter 140, BPT]

C. Compliance with the TRS lb/ton BLS emission limit shall be demonstrated by stack testing once every two years. [MEDEP Chapter 124, TRS Control]
Enforceable by State-only

D. The Mill is subject to and shall comply with the requirements of 40 CFR Part 60, Subpart A and Subpart BB for Smelt Tank C. [40 CFR Part 60, Subpart BB]

E. By March 13, 2004 the Mill shall comply with the requirements of 40 CFR Part 63, Subpart A and Subpart MM for Smelt Tank C. [40 CFR Part 63, Subpart MM]

F. Emissions from Smelt Tank C shall continuously vent through one of the two Venturi Scrubber Systems when Smelt Tank C is in operation. the Mill shall keep records of scrubber downtime. [MEDEP Chapter 140, BPT]

G. The Mill shall monitor and record the following for Smelt Tank C:

| Parameter for each scrubber | Monitor | Record |
|-----------------------------|---------------------|---------------------|
| venturi pressure drop | continuously | continuously |
| scrubber media flowrate | continuously | continuously |
| scrubber media solids | once every 24 hours | once every 24 hours |

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

(30) Lime Slaker

- A. The Mill shall continuously operate the Venturi Scrubber System on the emissions from the Lime Slaker when the Lime Slaker is in operation. The Mill shall keep records of scrubber downtime. [MEDEP Chapter 140, BPT]
- B. The Mill shall operate the Lime Slaker such that the visible emissions from the stack do not exceed 20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. Compliance shall be demonstrated by testing in accordance with 40 CFR Part 60, Appendix A, Method 9 upon request by the Department. [MEDEP Chapter 140, BPT]
- C. The Mill shall monitor and record the following for the Lime Slaker:

| Parameter | Monitor | Record |
|-------------------------|--------------|--------------|
| venturi pressure drop | continuously | continuously |
| scrubber media flowrate | continuously | continuously |

[MEDEP Chapter 140, BPT]

(31) Bleach Plant

The Bleach Plant shall consist of the Bleach Plants A-Line and B-Line, the Bleaching Scrubber System, the R8 ClO₂ Generation Plant, and the ClO₂ Scrubber System.

- A. Total Cl₂ emissions from the Bleach Plant shall not exceed 3.0 lb/hour. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
- B. Total ClO₂ emissions from the Bleach Plant shall not exceed 3.0 lb/hour. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
- C. Total chlorinated HAP emissions (not including chloroform) measured as chlorine from the equipment specified in 63.445(b) shall meet:
 - 1. Reduce the total chlorinated HAP mass in the vent stream entering the scrubber by 99 percent or more by weight; or
 - 2. Achieve a scrubber outlet concentration of 10 ppmv of total chlorinated HAP; or
 - 3. Achieve a scrubber outlet mass emission rate of 0.001 kg of total chlorinated HAP mass per megagram (0.002 lb/ton) of ODP.

[40 CFR Part 63, §63.445(c)]

- D. The Mill shall not utilize, without a prior license revision, sodium hypochlorite as a primary bleaching agent in the Bleach Plant. [MEDEP Chapter 134, VOC RACT]
- E. The Mill shall operate the Bleach Plant Scrubber System, when the Bleach Plant is in operation, in accordance with the requirements of 40 CFR Part 63, §63.445(c). [40 CFR Part 63, §63.445(b) and MEDEP Chapter 122, Cl₂ & ClO₂ Emission Standard]
- F. The Mill shall monitor and record the following for each of the Bleach Plant Scrubber Systems A & B, and the ClO₂ Generation Plant Scrubber System:

| Parameter for each scrubber | Monitor | Record |
|------------------------------------|----------------|---------------|
| recycle flow | continuously | once a shift |
| pressure drop | continuously | once a shift |
| recycle fluid ORP | continuously | once a shift |
| fan amperage | continuously | once a shift |

[MEDEP Chapter 122, Cl₂ & ClO₂ Emission Standard and 40 CFR Part 63, §63.453(c)]

- G. The Mill shall run the Bleach Plant Scrubber fan(s) at maximum speed during any performance test used to demonstrate compliance. [40 CFR Part 63, §63.453(m)]
- H. The Mill shall satisfy all applicable monitoring requirements found in 40 CFR Part 63, §63.453(m), (n), and (o). [40 CFR Part 63, §63.453(m)]

(32) **Digesters**

- A. Digesters #1, #2, #3, and #4 are subject to 40 CFR Part 60 Subpart BB. The Mill shall comply with the standards, monitoring, recordkeeping, and reporting requirements of this subpart. [40 CFR Part 60, Subpart BB]
- B. The condensates from the digester system shall be collected and treated by the Steam Stripper in accordance with 40 CFR Part 63, §63.446. [40 CFR Part 63, Subpart S]
- C. The digester system vents are considered part of the LVHC system. The Mill shall comply with the recordkeeping and reporting requirements of MEDEP Chapter 124 and 40 CFR Part 63, Subpart S for the LVHC system. [MEDEP Chapter 124, TRS Control and 40 CFR Part 63, Subpart S]

(33) LVHC System Equipment Requirements

- A. Each digester shall be vented to either Boiler #3, Boiler #5, Boiler #6, Boiler #7 or the Lime Kiln when the digester is in use as specified in 40 CFR Part 63, Subpart S and MEDEP Chapter 124. [40 CFR Part 63, Subpart S and MEDEP Chapter 124]
- B. The evaporators shall be vented to either Boiler #3, Boiler #5, Boiler #6, Boiler #7 or the Lime Kiln when the evaporators are in use as specified in 40 CFR Part 63, Subpart S and MEDEP Chapter 124. [40 CFR Part 63, Subpart S and MEDEP Chapter 124]
- C. The digester systems and the evaporator systems are subject to and shall comply with the recordkeeping and reporting requirements of 40 CFR Part 63, Subpart S. [40 CFR Part 63, Subpart S]
- D. The digester systems and the evaporator systems are subject to and shall comply with the recordkeeping and reporting requirements of MEDEP Chapter 124. [MEDEP Chapter 124, TRS Control]
- E. The Mill shall not allow venting of TRS from the LVHC system or associated equipment which exceeds the allowances in MEDEP Chapter 124 or 40 CFR part 63, Subpart S. [40 CFR Part 63, Subpart S and MEDEP Chapter 124]
- F. The Mill shall keep records of all ventings from the LVHC system as required by Chapter 124. [MEDEP Chapter 124, TRS Control]
- G. The condensates from the LVHC system shall be collected and treated by the steam stripper in accordance with Condition (36). [40 CFR Part 63, Subpart S]

(34) HVLC System Equipment Requirements

A. Kamyr Chip Bin

- 1. The Kamyr chip bin is subject to and shall comply with the requirements of MEDEP Chapter 124. [MEDEP Chapter 124, TRS Control]
- 2. The Kamyr chip bin is subject to the requirements of 40 CFR Part 63, Subpart A and Subpart S. [40 CFR Part 63, Subpart S]

B. Hardwood Brown Stock Washer System and Hardwood Decker

1. The hardwood brown stock washer system shall be vented to either Boiler #3, Boiler #5, Boiler #6, or Boiler #7 when the washer system is in use as specified in Condition (34)E. The hardwood brown stock washer system is subject to and shall comply with the requirements of NSPS 40 CFR Part 60, Subpart A and Subpart BB. [40 CFR Part 60, Subpart BB]
2. The hardwood brown stock washer system is subject to and shall comply with the requirements of 40 CFR Part 63, Subpart A and Subpart S. [40 CFR Part 63, Subpart S]
3. If shower water containing more than 400 ppmw of methanol is used on the Hardwood Decker, the Mill shall collect the NCGs and vent them to the HVLC system. [40 CFR Part 63, Subpart S]
4. If shower water is used on the Hardwood Decker, which causes emissions of TRS greater than 0.75 lb/hr on a continuous basis under normal operations, the Mill shall collect the NCGs and vent them to the HVLC system. [MEDEP Chapter 124, TRS Control]

C. Softwood Brown Stock Washer System and Softwood Decker

1. No later than April 17, 2005 the softwood brown stock washer system shall be vented to either Boiler #3, Boiler #5, Boiler #6, or Boiler #7 when the washer system is in use as specified in Condition (34)E. [MEDEP Chapter 124, TRS Control]
2. If shower water containing greater than 400 ppmw of HAPS (measured as methanol) is used, then no later than April 17, 2006 the softwood decker shall be vented to either Boiler #3, Boiler #5, Boiler #6, or Boiler #7 when the decker is in use as specified in Condition (34)E. [40 CFR Part 63, Subpart S]
3. If shower water is used on the Softwood Decker, which causes emissions of TRS greater than 0.75 lb/hr on a continuous basis under normal operations, the Mill shall collect the NCGs and vent them to the HVLC system no later than July 1, 2007. [MEDEP Chapter 124, TRS Control]
4. The softwood brown stock washer system and softwood decker are subject to and shall comply with the requirements of MEDEP Chapter 124. [MEDEP Chapter 124, TRS Control]

5. No later than April 17, 2006 the softwood brown stock washer system and the softwood decker (as specified in Condition (34)(C)(2) above) shall be vented to either Boiler #3, Boiler #5, Boiler #6, or Boiler #7 when the washer system and/or decker are in use. The softwood brown stock washer system and softwood decker are subject to and shall comply with the requirements of 40 CFR Part 63, Subpart S. [40 CFR Part 63, Subpart S]

D. Saltcake Mix Tank and Precipitator Mix Tank

No later than July 1, 2007 the saltcake mix tank and the precipitator mix tank shall be vented to either Boiler #3, Boiler #5, Boiler #6, or Boiler #7 when the tanks are in use as specified in Condition (34)(E)(2). The saltcake mix tank and the precipitator mix tank are subject to and shall comply with the requirements of MEDEP Chapter 124. [MEDEP Chapter 124, TRS Control]

E. General System Requirements

1. No later than April 17, 2005 the HVLC system shall maintain a 96% collection and control uptime based on quarterly brownstock washer system operating time on a total mass weighted basis. [MEDEP Chapter 124, TRS Control]
2. The HVLC system shall maintain a 96% collection and control uptime based on quarterly brownstock washer system operating time on a total mass weighted basis by the effective dates required by 40 CFR Part 63, Subpart S. [40 CFR Part 63, Subpart S]
3. Condensates from the HVLC system shall be collected and treated by the Steam Stripper as required by 40 CFR Part 63, Subpart S. [40 CFR Part 63, Subpart S]

(35) Closed Collection and Vent System Monitoring

- A. For equipment required to be inspected per 40 CFR §63.453(k) and (l), the Mill shall exempt any closed vent system, fixed roof cover, or enclosure from 30-day and annual inspection, monitoring and repair requirements if it is determined that personnel performing the inspection or repair would be exposed to an imminent or potential danger, or the equipment could not be inspected without elevating the inspection personnel more than 6 feet above a supported surface. The site-specific monitoring plan must identify exempted equipment and describe how the equipment will be inspected and/or repaired during periods determined safe which must be at least once during each permit term. [40 CFR Part 63, §63.453(m)]

- B. The Mill shall perform inspections in accordance with 40 CFR Part 63, §63.453(k) and (l) once during each calendar month with at least 21 days elapsed time between inspections. [40 CFR Part 63, §63.453(m)]
- (36) Condensate Collection System
- A. The Mill shall collect pulping process condensates that contain a total HAP mass of 11.1 pounds per ton of oven-dry pulp or greater. [40 CFR Part 63, §63.446(c)]
- B. The Mill shall treat the pulping process condensates to remove 10.2 pounds of HAP per ton of oven-dry pulp or greater or achieve a total HAP concentration of 330 ppm at the outlet of the control device. [40 CFR Part 63, §63.446(e)]
- C. Excess emissions regarding condensate collection and control shall not be a violation provided that such excess emissions (including periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed 10%. [40 CFR Part 63, §63.446(g)]
- (37) Multiple Effect Evaporators
- A. The evaporators are subject to 40 CFR Part 60 Subpart BB. The Mill shall comply with the standards, monitoring, recordkeeping, and reporting requirements of this subpart. [40 CFR Part 60, Subpart BB]
- B. The applicable condensates from the evaporators shall be collected and treated by the Steam Stripper in accordance with 40 CFR §63.446. [40 CFR Part 63, Subpart S]
- C. The evaporator vents are considered part of the LVHC system. The Mill shall comply with the recordkeeping and reporting requirements of MEDEP Chapter 124 and 40 CFR Part 63, Subpart S for the LVHC system. [MEDEP Chapter 124, TRS Control and 40 CFR Part 63, Subpart S]
- (38) Steam Stripper System
- The Steam Stripper System is comprised of the steam stripper, foul condensate tank, associated piping and ductwork.
- A. The Mill is licensed to operate the steam stripper system. Emissions from the steam stripper and the foul condensate storage tank shall be collected and controlled by Power Boilers #3, #5, #6, and/or #7 for a minimum of 99% of

the stripper operating time on a quarterly basis. [MEDEP Chapter 124, TRS Control and 40 CFR Part 63, Subpart S]

- B. The Mill shall record the amount of time on a quarterly basis of:
 - 1. the stripper operation;
 - 2. the combustion of SOGs in Boilers #3 or #5, or Cogen Boilers #6 or #7;
and
 - 3. any venting of SOGs.
- C. Any ventings of SOGs in portion or in whole shall be considered time of uncontrolled emissions, which shall not exceed the specified 1% above. Stripper downtime shall be counted toward the 10% excess emissions allowance provided in Condition 36(C). [MEDEP Chapter 140, BPT, 40 CFR part 63, Subpart S]
- D. The Mill shall monitor and record the following for the Steam Stripper:

| Parameter | Monitor | Record |
|--------------------------------------|----------------|---------------|
| process wastewater feed rate | continuously | continuously |
| steam feed rate | continuously | continuously |
| process wastewater column feed temp. | continuously | continuously |

[40 CFR Part 63, §63.453(g)]

- E. The steam stripper system is subject to and shall comply with the requirements of MEDEP Chapter 124 and 40 CFR Part 63, Subpart S. [MEDEP Chapter 124, TRS Control, 40 CFR Part 63, Subpart S]
- (39) Emission Units Associated with the R-10 Paper Machine
- A. Visible emissions from each of the R-10 Dryers #1, #2, #3, and #4 shall not exceed 10% opacity on a six (6) minute block average basis. [MEDEP Chapter 140, BPT]
 - B. The Mill shall fire only propane or natural gas fuel in each of the R-10 Dryers #1, #2, #3, and #4. [MEDEP Chapter 140, BPT]

C. Emissions from the R-10 Dryers #1, #2, #3, and #4 shall not exceed the following limits:

| Pollutant | lb/MMBtu - each dryer | lb/hr - total |
|------------------|----------------------------------|--------------------------|
| PM | 0.12 | 3.47 |
| PM ₁₀ | -- | 3.47 |
| SO ₂ | -- | 0.016 |
| NO _x | -- | 4.47 |
| CO | -- | 0.61 |
| VOC | -- | 0.16 |

[MEDEP Chapter 140, BPT]

(40) R-10, R-11, R-12, R-15 Paper Machines and on-line coaters

The R-10, R-11, R-12, and R-15 paper machines are subject to the recordkeeping requirements of MEDEP Chapter 123, Section 5(D). [MEDEP Chapter 123, Paper Coating]

The on-line coaters associated with paper machines R-10, R-11, R-12 and R-15 are subject to the applicable requirements of 40 CFR 63, Subpart A and Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating with a compliance date of December 5, 2005.

(41) Bulk Handling Systems

A. The Mill operates the following commodity bulk handling and storage systems:

1. Number 15 Paper Machine Starch Silo #1
2. Number 15 Paper Machine Starch Silo #2
3. North Mill Starch Silo #1
4. North Mill Starch Silo #2
5. Lime Kiln Silo
6. River Bank (ETP) Lime Silo
7. Cogen Limestone Unloading
8. Farrington Mountain Ash Conditioning Facility Silo
9. Cogen Ash Silo

B. For the bulk handling systems, the Mill shall:

1. Maintain the alarm systems in proper operating condition.
2. Maintain all baghouses to achieve visible emissions no greater than 10% opacity on a six minute average basis, except for no more than one 6-minute block average per hour.

3. Clean-up all spills within 24 hours of the occurrence of each spill.
 4. Inspect all unloading systems for leaks and malfunctions as described by the Mill's BMP Plan. The BMP Plan shall be available to the Department upon request.
 5. Discontinue unloading until leaks and/or malfunctions are eliminated.
[MEDEP Chapter 140, BPT]
- (42) The Mill shall maintain a NPDES or SPDES permit. [MEDEP Chapter 134, VOC RACT]
- (43) Emergency Diesels
- A. The Mill shall limit the Emergency Diesels (Cogen Emergency Generator, R15 Emergency Generator, Mill Emergency Generator, and Emergency Fire Pump) to 500 hr/yr of operation each (based on a 12 month rolling total). An hour meter shall be installed and operated on each Emergency Diesel.
 - B. A log(s) documenting the dates and hours of operation for the Emergency Diesels shall be kept.
 - C. The Emergency Diesels shall fire #2 fuel oil with a sulfur limit not to exceed 0.05% by weight. Fuel records, including percent sulfur, shall be maintained.
 - D. Visible emissions from each Emergency Diesel shall not exceed 20% opacity on a 6 minute block average, except for no more than 2 six minute block averages in a continuous 3 hour period.
- (44) Parts Washers
- The parts washers are subject to the operational and record keeping requirements of MEDEP Chapter 130 which include, but are not limited to, the following:
- A. The Mill shall keep monthly records of the amount of solvent added to each parts washer and maintain the records for a period of two years.
 - B. The Mill shall attach a permanent conspicuous label to each unit summarizing the following operational standards of Chapter 130:
 1. Equip each cold cleaning degreaser with a cover that is easily operated with one hand if:
 - a.the solvent vapor pressure is greater than 15 millimeters of mercury measured at 100 °F by ASTM D323-89; or,
 - b.the solvent is agitated; or,
 - c.the solvent is heated.
 2. Close the covers on all solvent degreasing tanks when the tanks are not in use;
 3. Drain the cleaned parts for at least fifteen (15) seconds or until dripping stops;
 4. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized or shower-type spray) at a pressure that does not exceed ten (10) pounds per square inch gauge pressure (psig);

5. Do not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
6. Minimize drafts to less than 40 meters/minute;
7. Refrain from operating the cold cleaning degreaser upon the occurrence of any visible solvent leak until such leak is repaired; and
8. Do not use any halogenated solvents in the degreasing tanks.

[MEDEP Chapter 130]

(45) Methanol Storage Tank

The methanol storage tank is subject to the recordkeeping requirements of 40 CFR part 60, Subpart Kb. [40 CFR part 60, Subpart Kb]

(46) **Monitoring and Recordkeeping Requirements**

[MEDEP Chapters 140, 117, and 122]

A. The following are identified as Periodic Monitors:

1. Fuel use records for Boilers #3, #5, #6, #7, the Lime Kiln, and Recovery Boiler C.
2. Fuel analysis records for Boilers #3, #5, #6, #7, the Lime Kiln, and Recovery Boiler C.
3. Fuel oil and natural gas firing rate for Power Boilers #3 and #5.
4. Media solids for the scrubbers on Boilers #3 and #5.
5. ESP voltage and amperage for Power Boilers #6 and #7.
6. Media solids for the Lime Kiln Scrubber.
7. NCGs firing duration for the Lime Kiln
8. Virgin black liquor solids for Recovery Boiler C.
9. Black liquor firing rate for Recovery Boiler C.
10. Media solids for the Smelt Tank C Scrubbers.
11. VOC content of coatings used.
12. Sulfur content of diesel fuel fired in the Emergency Diesels.
13. Hours of operation for each Emergency Diesel.
14. Documentation that the Mill is maintaining a valid NPDES and/or SPDES permit.
15. Solvent used in each Parts Washer.
16. Steam Stripper monitoring requirements

B. Periodic monitors must record accurate and reliable data. Periodic monitors and associated recording equipment shall be operated at all times except during periods of calibration or malfunction.

C. The following are identified as Parameter Monitors:

1. Venturi pressure drop for the scrubbers on Power Boilers #3 and #5.
2. Firing duration of NCGs, HVLCs, and/or SOGs for Power Boilers #3 and #5.

3. Air/fuel ratio and combustion O₂ trim control for any time either Power Boiler #6 or #7 is under normal operation while the other is in the process of startup or shutdown.
 4. Media flow rate for the Lime Kiln Scrubber.
 5. Venturi pressure drop for the scrubbers on Smelt Tank C.
 6. Media flow rate for the scrubbers on Smelt Tank C.
 7. Venturi pressure drop for the scrubber on the Lime Slaker.
 8. Media flow rate for the scrubber on the Lime Slaker.
 9. Recycle flow for the Bleach Plant scrubbers.
 10. Pressure drop for the Bleach Plant scrubbers.
 11. Recycle ORP for the Bleach Plant scrubbers.
 12. Fan amperage for the Bleach Plant scrubbers.
- D. Parameter monitors must record accurate and reliable data. If a parameter monitor allows the recording of accurate and reliable data less than 98% of the source operating time within any quarter of the calendar year (or less than 90% of the source operating time for bleach plant parameter monitors), the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not providing accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to provide accurate and reliable data was due to the performance of the established quality assurance and quality control procedures or unavoidable malfunctions.
- E. For all CEMS and COMS recordkeeping shall include:
1. 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;
 2. 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;
 3. A report of other data indicative of compliance with the applicable emission standard for those periods when the CEMS or 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 Departments request, provide additional data, and shall have the burden of demonstrating that the data is indicative of compliance with the applicable standard.

(47) **Quarterly Reporting**

The licensee shall submit a Quarterly Report to the Bureau of Air Quality and EPA 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]

1. All control equipment downtimes and malfunctions;
2. All CEMS or COMS downtimes and malfunctions;
3. All parameter monitor downtimes and malfunctions;
4. 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;
 - a. Standard exceeded;
 - b. Date, time, and duration of excess event;
 - c. 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;
 - d. A description of what caused the excess event;
 - e. The strategy employed to minimize the excess event; and
 - f. The strategy employed to prevent reoccurrence.
5. A report certifying there were no excess emissions, if that is the case.

(48) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due with every other quarterly report, and the initial semiannual report is due July 31, 2004.

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

[MEDEP Chapter 140]

(49) **Annual Compliance Certification**

The licensee shall submit an annual compliance certification to the Department in accordance with Condition (20) of this license. The initial annual compliance certification is due January 31, 2004. Compliance certification is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance certification may be based upon other reasonably available information such as the design of the equipment, or applicable emission factors. [MEDEP Chapter 140]

(50) 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.

(51) **Annual Emission Statement**

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

- 1) A computer program and accompanying instructions supplied by the Department;
or
- 2) 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 September 1 or as otherwise specified in Chapter 137.

(52) **Biennial Emission Statement**

In accordance with MEDEP Chapter 137, the licensee shall report, no later than September 1, every two years (1996,1998,etc.) or in a timeframe designated to the Department, 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

The emission statement must be submitted no later than September 1 or as otherwise specified in Chapter 137.

- (53) The Mill 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 |

- (54) **Units Containing Ozone Depleting Substances**

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

- (55) The Mill is subject to all applicable requirements of 40 CFR Part 68 (Risk Management Plan).
- (56) The Mill shall pay the annual air emission license fee within 30 days of July 31st of each year. Pursuant to 38 M.R.S.A. Section 353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under 38 M.R.S.A. Section 341-D, Subsection 3.

- (57) **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]

**MeadWestvaco Oxford Corporation
Oxford County
Rumford, Maine
A-214-70-A-I**

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

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

DONE AND DATED IN AUGUSTA, MAINE THIS _____ DAY OF _____ 2003.
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 8/28/96

Date of application acceptance: 8/28/96

Date filed with the Board of Environmental Protection _____

This Order prepared by Lynn Ross, Bureau of Air Quality.