

**Katahdin Paper Company LLC  
Penobscot County  
East Millinocket, Maine  
A-405-70-F-A**

**Departmental  
Findings of Fact and Order  
Part 70 Air Emission License  
Amendment #4**

After review of the Part 70 Significant Modification 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	Katahdin Paper Company LLC (KPC)
LICENSE NUMBER	A-405-70-F-A
LICENSE TYPE	Part 70 Significant Modification
NAICS CODES	322122
NATURE OF BUSINESS	Paper Mill
FACILITY LOCATION	Main St., East Millinocket
DATE OF INITIAL LICENSE ISSUANCE	<b>November 13, 2002</b>
DATE OF AMENDMENT ISSUANCE	<b>February 23, 2007</b>
LICENSE INITIAL EXPIRATION DATE	<b>November 13, 2007</b>

B. Modification Description

MEDEP Chapter 101, Section 3(A) contains a provision which exempts opacity violations for four hours from boilers greater than 100 MMBtu/hr during cold start-up. This provision sunsets on December 31, 2006. Section 3(B) of the same chapter allows affected facilities to amend their air emission license to establish site specific conditions and allowances for boiler start-up and shutdown. KPC has requested an amendment to their license to establish these allowances and to incorporate them into their Part 70 license.

KPC has requested the same four hour exemption previously allowed by MEDEP Chapter 101 be applied to boilers EB1, EB2, and EB3. KPC also requested the definition of initiation of boiler cold start-up be defined as "first fire" and not ID fan start-up. For various reasons the ID fan is often started and run for extended periods of time prior to actual operation of the boiler and is not an accurate representation of the beginning of boiler operations.

In addition, this amendment also updates Conditions related to submittal of the facility's annual air emissions statement based on recent changes to MEDEP Chapter 137.

C. Application Classification

The application for KPC does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be a Part 70 Significant Modification issued under Chapter 140 of the Department's regulations for a Part 70 source.

**ORDER**

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

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

The Department hereby grants the Part 70 Significant Modification A-405-70-F-A pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

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

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

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

**The following shall replace Condition (24) of Air Emission License A-405-70-A-I:**

(24) **Annual Emission Statement**

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

- A. A computer program and accompanying instructions supplied by the Department;

or

- B. 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 no later than July 1 or as otherwise specified in Chapter 137.

[MEDEP Chapter 137]

**The following are New Conditions:**

- (34) For boilers EB1, EB2, and EB3, violations of the opacity standard listed in Conditions (14)(J) and (15)(I) during the first four (4) hours, starting with the first violation during the initiation of cold start-up or planned shut down, are exempt provided that operating records are available to demonstrate that the facility was being operated to minimize emissions. Initiation of cold start-up is defined as to start with first fire into the boiler.

[MEDEP Chapter 101 & MEDEP Chapter 140, BPT]

(35) **Air Toxics Emissions Statement**

If KPC exceeds the thresholds for HAPs listed in Appendix A of MEDEP Chapter 137 in an inventory year, in accordance with MEDEP Chapter 137 the licensee shall report, no later than July 1 every three years (2005, 2008, 2011, etc.) or as otherwise stated in Chapter 137, the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a computer program supplied by the Department or a written emission statement containing the information required in MEDEP Chapter 137.

NOTE: Based on emission factors developed by the Eastern Research Group (ERG) in their memo "Development of Average Emission Factors and Baseline Emission Estimates for the Industrial, Commercial and Institutional Boilers and Process Heaters National Emission Standard for Hazardous Air Pollutants" dated October 2002, KPC will most likely exceed the Chapter 137 thresholds of HAPs based on fuel burning alone should the facility exceed the following firing rates in a calendar year: 64,725 gallons of #6 fuel oil or 4,698 tons of biomass.

