

**Huhtamaki Foodservice, Inc.**  
**Kennebec County**  
**Waterville, Maine**  
**A-416-70-C-A**

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

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

A. Introduction

FACILITY	Huhtamaki Foodservice, Inc. (Huhtamaki)
INITIAL LICENSE NUMBER	A-416-70-A-I
LICENSE TYPE	Minor Modification
NAICS CODES	322222, 322299
NATURE OF BUSINESS	Molded paper products
FACILITY LOCATION	Waterville, Maine
INITIAL LICENSE ISSUANCE DATE	January 14, 2002
AMENDMENT ISSUANCE DATE	November 5, 2004
LICENSE EXPIRATION DATE	January 14, 2007

B. Application Classification

Huhtamaki has requested a 502(b)(10) Change to their Part 70 Title V license in order to increase particulate matter (PM and PM<sub>10</sub>) emission limits for Boiler #5 from 0.15 lb/MMBtu to 0.20 lb/MMBtu. Annual emissions from Boilers #4 and #5 (which share a common stack) will not change as a result of the emission limit increase. The change is not a physical change in, or a change in the method of operation of, a stationary source which increases the amount of any air pollutant emitted by such source or which results in the emission of any air pollutant not previously emitted. Therefore this amendment has been determined to be a 502(b)(10) change, and has been processed as such.

C. Minor Revision Description

1. **Establishment of 0.15 lb/MMBtu as the particulate emission limit**

In 1981, Huhtamaki (then Keyes Fibre Company) requested an amendment to their license to allow the combustion of woodex pellets in Boilers #1 and #4. At the time Waterville was considered non-attainment for PM. A condition of the license amendment was that Huhtamaki agreed to limit the annual PM to 1977 limits and to accept RACT for all of its boilers. Thus an emission limit

of 0.15 lb/MMBtu was established for Boiler #5. This was not a PSD determination.

After the issuance of the 1981 amendment, Boilers #1 and #4 were never converted to fire wood and there are no longer ambient standards for PM. The RACT limits imposed on the boilers were carried forward and Huhtamaki is still permitted to emit 1977 levels of PM on an annual basis.

2. **Current improvements to Boiler #5**

During the summer of 2004 Huhtamaki made improvements to Boiler #5 in order to improve fuel combustion efficiency and decrease NOx emissions from the boiler. New burner tips were installed and the boiler operations adjusted to limit O<sub>2</sub>, thus preventing NOx formation. The boiler modifications, combined with Boiler #5's very narrow and short combustion chamber, caused concern that Boiler #5 would consistently meet the 0.15 lb/MMBtu emissions limit. Decreasing O<sub>2</sub>, while lowering NOx emissions, often has the unfortunate side effect of increasing PM.

Boiler #4 has not operated in many years and is not expected to operate in the near future.

3. **Department determination**

Huhtamaki is requesting that the PM limit for Boiler #5 be increased to 0.20 lb/MMBtu. This is demonstrated as BACT for a number of other similar boilers located throughout the state. Further, the increased limit is consistent with the state's regulations in Chapter 103.

The Department finds that increasing the particulate matter limit for Boiler #5 to 0.20 lb/MMBtu is consistent with BACT as demonstrated at several similar sites throughout the state and Chapter 103. Huhtamaki shall continue to limit annual particulate matter to 1977 levels. Boiler #5 shall not exceed an annual fuel use of 3,110,400 gallons of #6 fuel oil. This prevents the boiler from exceeding the significance limits that would trigger major New Source Review. Following scheduled PM testing during the 2004 calendar year, the Department reserves the right to reevaluate the PM limits for Boiler #5 and to readjust them if reasonable based on the results of the test.

**ORDER**

**The following replaces Condition 16(D) of License A-416-70-A-I:**

(16) **Boiler No. 5**

D. Emissions from Boiler No. 5 shall not exceed the following limits:

Pollutant	lb/MMBtu	lb/hr	Origin & Authority	Enforceability
PM	0.20	12.96	MEDEP Chapter 140, BPT	Lb/hr limit enforceable by State-only
PM <sub>10</sub>	0.20	12.96	MEDEP Chapter 140, BPT	Lb/hr limit enforceable by State-only
SO <sub>2</sub>	--	115.1	MEDEP Chapter 140, BPT	Enforceable by State-only
NO <sub>x</sub>	0.40	24	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	--	2.2	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	--	0.55	MEDEP Chapter 140, BPT	Enforceable by State-only

The following are new Conditions, to be added to Condition (16) of License A-416-70-A-I:

(16)

- H. Boiler #5 shall not exceed the use of 3,110,400 gallons/year of #6 fuel oil on an annual basis. The fuel use shall be calculated as a 12-month block average, with the first month of the first block average being the month in which this amendment is issued. Huhtamaki shall keep records of fuel use for Boiler #5.
- I. Following the results of particulate matter testing on Boiler #5, the Department reserves the right to reexamine and readjust the PM limits for Boiler #5.

DONE AND DATED IN AUGUSTA, MAINE THIS                      DAY OF                      2004.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: July 13, 2004

Date of application acceptance: July 28, 2004

Date filed with the Board of Environmental Protection: \_\_\_\_\_

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