

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



JANET T. MILLS
GOVERNOR

MELANIE LOYZIM
ACTING COMMISSIONER

IN THE MATTER OF:

ND PAPER INC.)	ADMINISTRATIVE CONSENT
RUMFORD, MAINE)	AGREEMENT
AIR QUALITY VIOLATION)	(38 M.R.S. § 347-A)
EIS NUMBER 2017-165-A)	

This Agreement, by and among ND Paper Inc., the State of Maine, the Office of the Attorney General (“OAG”), and Department of Environmental Protection (“Department” or “DEP”), as approved by the Maine Board of Environmental Protection (“Board”), is entered into pursuant to the laws concerning the Department’s *Organization and Powers*, 38 M.R.S. §§ 347-A(1) and 341-D(6).

THE PARTIES AGREE AS FOLLOWS:

1. ND Paper Inc. is a Delaware Corporation that operates a pulp and paper mill located in Rumford, Maine. Throughout the period of time addressed by this Agreement, ND Paper Inc. was known as Catalyst Paper Operations Inc. ND Paper Inc. and Catalyst Paper Operations Inc. are the same corporate entity. As shown by the Amended Application for Authority to Do Business filed with the Maine Secretary of State on September 24, 2018, Catalyst Paper Operations Inc. changed its corporate name to ND Paper Inc. This corporation shall be referred to as “ND Paper” for purposes of this Agreement.
2. Throughout the period of time addressed by this Agreement, ND Paper was subject to the conditions of Air Emission License A-214-70-G-R/A (“AEL”). The AEL was originally granted to Rumford Paper Company. ND Paper is a successor in interest to Rumford Paper Company. Any references to “Rumford Paper Company” or “the Mill” in the AEL apply to ND Paper, and the AEL is binding upon ND Paper.
3. Throughout the period of time addressed by this Agreement, ND Paper was subject to AEL, Condition 17(D)(1), which states in relevant part:

(17) *Cogen Boilers #6 and #7*

D. NESHAPs 40 CFR Part 63, Subpart DDDDD (Boiler MACT)

1. *Emission Limits [40 CFR Part 63, Subpart DDDDD Table 2]*

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143

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On and after the waste-to-fuel effective date identified above, Rumford Paper Company shall comply with the applicable emission limits for specific pollutants in 40 CFR Part 63, Subpart DDDDD, Table 2. For those pollutants which are limited both by the license and by Boiler MACT, the facility shall comply with the more stringent limit. [40 CFR §63.7505(a)]

40 CFR Part 63, Subpart DDDDD, contains Table 2, which states in relevant part:

Emission Limits for Existing Boilers and Process Heaters;

HCL: 2.2E-02 lb per MMBtu of heat input

4. ND Paper's Cogen Boilers #6 and #7 are subject to the Major Source Boiler MACT (40 C.F.R. Part 63, Subpart DDDDD) which includes hydrogen chloride ("HCl") emission limits for the affected boilers. 40 C.F.R. Part 63, Subpart DDDDD, contains Table 2, which states in relevant part:

Emission Limits for Existing Boilers and Process Heaters;

HCL: 2.2E-02 lb per MMBtu of heat input

5. Between February 15, 2017 and February 16, 2017, ND Paper performed HCl testing, in accordance with 40 C.F.R. Part 63, Subpart DDDDD, on the #6 and #7 Cogen Boilers. Both the February test and retesting that occurred between March 28, 2017 and March 30, 2017 exceeded the 2.2E-02 lb per MMBtu of heat input limit as set forth in Condition 17(D)(1) of ND Paper's AEL and 40 C.F.R. Part 63, Subpart DDDDD. ND Paper provided the Department with operational information documenting that on April 12, 2017 it implemented new HCl fuel input level control strategies. ND Paper retested between May 30, 2017 and May 31, 2017 and met Condition 17(D)(1) and established fuel input control strategies levels to meet 40 C.F.R. Part 63 Subpart DDDDD. The Department determined that with the implementation of the HCl fuel input level control strategies in April, ND Paper returned to compliance with AEL, Condition 17(D)(1) and 40 C.F.R. Part 63, Subpart DDDDD.
6. **By exceeding the 2.2E-02 lb per MMBtu of heat input limit, ND Paper was in violation of AEL, Condition 17(D)(1) and 40 C.F.R. Part 63, Subpart DDDDD for a total of 62 days.**
7. Throughout the period of time addressed in this Agreement, ND Paper was subject to AEL, Condition 17(C)(2) and 40 C.F.R. Part 63, Subpart DDDDD Table 4 (Operating Limits for Boilers and Process Heaters), which states in relevant part:

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(17) *Cogen Boilers #6 and #7*

C. *Emission Limits*

2. *Visible emissions from the combined stack for Cogen Boilers #6 and #7 shall not exceed 20% on a six-minute average basis, except for no more than one six-minute block average in a one-hour period of not more than 27% opacity. This opacity standard shall apply at all times except during periods of startup or shutdown.*

As of the effective date of 40 CFR Part 63, Subpart DDDDD applicability for these boilers, visible emissions shall not exceed the applicable standard as specified in Subpart DDDDD, demonstrated according to the applicable compliance demonstration method as specified in Subpart DDDDD.

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NESHAPs 40 CFR Part 63, Subpart DDDDD (Boiler MACT)

Table 4 – Operating Limits for Boilers and Process Heaters

Paragraph 4 Electrostatic precipitator control on a boiler or process heater not using a PM CPMS.

Sub-paragraph (a) This option is for boilers and process heaters that operate dry control systems (i.e., an ESP without a wet scrubber). Existing and new boilers and process heaters must maintain opacity to less than or equal to 10 percent opacity or the highest hourly average opacity reading measured during the performance test run demonstrating compliance with the PM (or TSM) emission limitation (daily block average).

8. **Quarterly Reports submitted by ND Paper to the Department from the fourth quarter of 2015 through the second quarter of 2018 documented that ND Paper exceeded the visible emissions limit on the combined stack for the #6 and #7 Cogen Boilers in violation of AEL, Condition 17(C)(2) for a total of 19 six-minute averages and 1 daily block average.**

9. Throughout the period of time addressed in this Agreement, ND Paper was subject to AEL, Condition 19(C)(1), which states in relevant part:

(19) *Recovery Boiler C*

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- C. *Emission Limits and Compliance Methods*
1. *Emissions from RBC shall not exceed the following limits.*

....
[Visible emissions of not more than] 30% opacity on a six-minute block average basis except for no more than one six-minute block average in a three-hour period. [A-214-71-E-A/R (July 18, 1989);096 CMR 101]

10. **Quarterly Reports submitted by ND Paper to the Department from the fourth quarter of 2015 through the second quarter of 2018 documented that ND Paper had exceeded the visible emissions limit for Recovery Boiler C in violation of AEL, Condition 19(C)(1) for a total of 23 six-minute block averages.**
11. Throughout the period of time addressed in this Agreement, ND Paper was subject to AEL, Conditions 17(C)(1) (table notes d and e) and 19(C)(1) (table note c.ii.), which state in relevant part:
- (17) *Cogen Boilers #6 and #7*
- C.1. SO₂ shall not exceed 0.32 lb/MMBTU per 24 hour block.
(see table notes d and e below)*
- d. In addition to the limitations listed above, The Mill shall be determined to be in compliance when Boilers #6 or #7 exceed the 176.4 lb/hour (352.8 lb/hour combined) SO₂ limit provided all of the following conditions are met:*
- i. Either Boiler #6 or #7 is firing any of the following gas streams: SOGs, LVHCs, or HVLCs;*
 - ii. SO₂ emissions from Cogen Boilers #6 and #7 combined do not exceed 500 lb/hour on a three-hour block average basis;*
 - iii. SO₂ emissions from Recovery Boiler C do not exceed 206.3 lb/hour on a three-hour block average basis;*
 - iv. SO₂ emissions from Boiler #3 does not exceed 60 lb/hour on a three-hour block average basis;*
 - v. The Mill shall report the dates, times, and average SO₂ emissions for each three-hour block when Boilers #6 and/or #7 utilize these alternative limits.*
- e. These alternative SO₂ limits as specified in (d) above shall not account for more than 4.0 ton/year of actual SO₂ emissions. Rumford Paper Company shall maintain records to document compliance with all SO₂ emission limits for these units.*

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(19) *Recovery Boiler*

C. *Emission Limits and Compliance Methods*

1. *(see table note c.ii. below)*

c. *As an alternative to the 206.3 lb/hr SO₂ emission limit, the Mill shall be determined to be in compliance when RBC exceeds the 206.3 lb/hr limit if all of the following requirements are met:*

ii. *SO₂ emissions from Cogen Boilers #6 and #7 combined shall not exceed 250.0 lb/hr on a 3-hour block average basis.*

12. **Quarterly Reports submitted by ND Paper to the Department from the fourth quarter of 2015 through the second quarter of 2018 documented that ND Paper exceeded the SO₂ emission limit for the Recovery Boiler C and Cogen Boilers #6 and #7, in violation of AEL, Conditions 17(C)(1) and 19(C)(1) for a total of 8 lb/hr exceedances and 2 lb/MMBtu exceedances.**

13. Throughout the period of time addressed in this Agreement, ND Paper was subject to AEL, Condition 22(D), which states in relevant part:

(22) *LVHC System*

D. *The Mill shall not allow venting of TRS from the LVHC system or associated equipment required to be controlled which exceeds 40 minutes in duration or contributes to an aggregate TRS venting of more than 1.0% of quarterly operating time. [06-096 CMR 124 (3)(C)]*

14. **Quarterly Reports submitted by ND Paper to the Department from the fourth quarter of 2015 through the second quarter of 2018 documented that ND Paper had a total of 3 TRS ventings from the LVHC system in violation of AEL, Condition 22(D).**

15. Throughout the period of time addressed in this Agreement, ND Paper was subject to AEL, Condition 26(F), which states in relevant part:

(26) *Bleach Plant*

F. *The Mill shall operate the Bleach Plant Scrubber System, when the Bleach Plant is in operation, in accordance with the requirements of 40 CFR 63,*

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§63.445(c). [A-214-77-8-M (August 24, 2009); 40 CFR Part §63.445(b);
06-096 CMR 115, BACT; and 38 M.R.S.A 589, §§2]

16. **Quarterly Reports submitted by ND Paper to the Department from the fourth quarter of 2015 through the second quarter of 2018 documented that ND Paper had a 4-hour block of low flow to the bleach plant scrubber in violation of AEL, Condition 26(F).**

17. Throughout the period of time addressed in this Agreement, ND Paper was subject to AEL, Conditions 17(E)(1) and (M), which state in relevant part:

(17) *Cogen Boilers #6 and #7*

E. Control Equipment

1. The Mill shall continue to operate and maintain the Multiple Cyclones and the Electrostatic Precipitator (ESP) to control emissions from Cogen Boilers #6 and #7. [06-096 CMR 140, BPT]

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M. 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. [A-214-70-A-I (July 30, 2003), BPT]

18. **Quarterly Reports submitted by ND Paper to the Department from the fourth quarter of 2015 through the second quarter of 2018 documented that ND Paper had a period of ESP downtime in violation of AEL, Conditions 17(E)(1) and (M).**

19. Throughout the period of time addressed in this Agreement, ND Paper was subject to 40 C.F.R. Part 63, Subpart DDDDD Table 3 (Work Practice Standards), which states in relevant part:

NESHAPs 40 CFR Part 63, Subpart DDDDD (Boiler MACT)

Table 3 – Work Practice Standards

Paragraph 5 If your unit is “An existing or new boiler or process heater subject

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to emission limits in Table 1 or 2 or 11 through 13 to this subpart during startup”.

Sub-paragraph (c)(2) You must engage and operate PM control within one hour of first feeding fuels that are not clean fuels.

20. **Quarterly Reports submitted by ND Paper to the Department from the fourth quarter of 2015 through the second quarter of 2018 documented that on February 20, 2017, ND Paper had a start-up period during which ND Paper did not operate the minimum number of fields, in violation of C.F.R. Part 63, Subpart DDDDD Table 3 (Work Practice Standards).**

21. Throughout the period of time addressed in this Agreement, ND Paper was subject to AEL, Condition 17(G), which states in relevant part:

(17) *Cogen Boilers #6 and #7*

G. Periodic Monitoring

Rumford Paper Company shall monitor and record parameters for Cogen Boilers #6 and #7 and their associated air pollution control equipment, as indicated in the following tables, whenever the equipment is operating. [A-214-70-A-I (July 30, 2003) and 06-096 CMR 140, BPT]:

<i>Cogen Boilers #6 and #7</i>			
<i>Parameter</i>	<i>Units of Measure</i>	<i>Monitoring Tool/Method</i>	<i>Frequency</i>
<i>Solid fuel firing rate</i>	<i>MMBtu/hour</i>	<i>Fuel measurement devices</i>	<i>Continuously, recorded daily</i>
<i>Solid fuels used (each)</i>	<i>Tons (each)</i>	<i>Recordkeeping</i>	<i>Monthly and annually</i>

For the purposes of the above tables, Continuously shall mean ongoing while the equipment is operating, providing, at a minimum, one data point per specified data recording period.

22. **Quarterly Reports submitted by ND Paper to the Department from the fourth quarter of 2015 through the second quarter of 2018 documented that, beginning on January 13, 2018 and ending on January 15, 2018, ND Paper had a 3-day period during which the Cogen Boiler #6 Merrick feeder drifted high causing an inaccurate recording of the solid fuel delivered to the boiler. ND Paper did not “continuously” monitor and record solid fuel delivery to Cogen Boiler #6 for 3 days in violation of AEL, Condition 17(G).**

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23. Throughout the period of time addressed in this Agreement, ND Paper was subject to AEL, Condition 19(D), which states in relevant part:

(19) *Recovery Boiler C*

D. Control Equipment

The Mill shall continue to operate and maintain the Electrostatic Precipitator to control emissions from Recovery Boiler C. [06-096 CMR 140, BPT]

24. **Quarterly Reports submitted by ND Paper to the Department from the fourth quarter of 2015 through the second quarter of 2018 documented that on May 29, 2018, ND Paper had a 6.2-hour period during which C-Recovery Boiler explosion dampers were not properly seated causing some flue gas to be vented through the C-Recovery Boiler Smelt Tank Scrubber by-passing the C-Recovery Boiler ESP in violation of AEL, Condition 19(D).**

25. Throughout the period of time addressed in this Agreement, ND Paper was subject to AEL, Condition 18(C), which states in relevant part:

(18) *Lime Kiln*

C. Control Equipment

The Mill shall continue to operate and maintain the Scrubber System to control emissions from the Lime Kiln at all times the Lime Kiln is in operation except when firing only natural gas with no lime in the Lime Kiln. [A-214-77-7-A (9/2/08) and 06-096 CMR 140, BPT]

26. **Quarterly Reports submitted by ND Paper to the Department from the fourth quarter of 2015 through the second quarter of 2018 documented that on June 10, 2018, ND Paper had a 2-hour period during which the Lime Kiln weak wash system that services the Lime Kiln Scrubber ran dry, which allowed Lime Kiln emissions to be emitted untreated in violation of AEL, Condition 18(C).**

27. On December 14, 2017, the Department issued a Notice of Violation to ND Paper in accordance with 38 M.R.S. § 347-A(1)(B) for the activities and violations described in the preceding paragraphs. The parties agree that this Agreement constitutes a legally sufficient Notice of Violation pursuant to 38 M.R.S. § 347-A(1)(B) for any violations specifically cited in this Agreement but not previously noticed, and that ND Paper has been adequately noticed for all violations described herein.

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28. This Agreement is not effective until it is approved and signed by the Board and the OAG.

29. To resolve the violations referred to in Paragraphs three (3) through twenty-six (26) of this Agreement, ND Paper agrees to a civil monetary penalty in the amount of Seventy-Nine Thousand, Seven Hundred Ten dollars (\$79,710.00) to be paid as follows and subject to the following conditions:
 - a. Immediately upon signing this Agreement, pay to the *Treasurer, State of Maine*, a civil monetary penalty of \$44,880.80.

 - b. Immediately upon signing this Agreement, pay to the Town of Rumford \$34,829.20 for the purposes of completing the Asbestos Removal and Erosion Control Supplemental Environmental Project (SEP) more fully described in Attachment A.

 - c. Any public statement, oral or written, in print, film, or other media, made by ND Paper making reference to the SEP described above shall include the following language: "This project was undertaken in connection with the settlement of an enforcement action taken by the Maine Department of Environmental Protection for various Air Emission License violations."

 - d. Any payments made by ND Paper pursuant to the SEP described above are not tax deductible and are ineligible for certification as tax exempt pollution control facilities pursuant to 36 M.R.S. §§ 105, 211.

30. The Department and OAG grant a release of their causes of action against ND Paper for the specific violations listed in Paragraphs three (3) through twenty-six (26) of this Agreement on the express condition that all actions listed in Paragraph twenty-nine (29) of this Agreement are completed in accordance with the terms and conditions of this Agreement. The release shall not become effective until all requirements of this Agreement are satisfied, as determined by the Department and the OAG in their sole discretion.

31. Any non-compliance with this Agreement, as determined by the Department or the OAG in their sole discretion, voids the release set forth in Paragraph thirty (30) of this Agreement and may lead to an enforcement action pursuant to 38 M.R.S. §§ 347-A(1)(A), 347-A(5), or 348, as well as pursuit of other remedies.

32. By signing and executing this Agreement, ND Paper knowingly, voluntarily, intentionally, permanently, and irrevocably waives any and all defenses it has or might have with respect to the enforcement of this Agreement.

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- 33. Actions taken pursuant to this Agreement shall be completed in accordance with the requirements of all applicable local, state, and federal laws, rules, and orders including but not limited to licensing requirements.
- 34. The provisions of this Agreement shall apply to, and be binding on, the parties and their officers, agents, servants, employees, successors, and assigns, and upon those persons in active concert or participation with them who receive actual notice of this Agreement.

IN WITNESS WHEREOF the parties hereto have executed this Agreement consisting of fourteen (14) pages:

ND PAPER INC. (F/K/A CATALYST PAPER OPERATIONS INC.)

BY:  DATE: 10-29-20
RANDALL CHICOINE, V.P. AND GENERAL MANAGER, MAINE OPERATIONS

MAINE BOARD OF ENVIRONMENTAL PROTECTION

BY: _____ DATE: _____
MARK C. DRAPER, CHAIR

MAINE OFFICE OF THE ATTORNEY GENERAL

BY: _____ DATE: _____
LAURA E. JENSEN, ASSISTANT ATTORNEY GENERAL

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Attachment A: Supplemental Environmental Project

ND PAPER INC.

Name of Project:

Asbestos Removal and Erosion Control

Project implementer:

Stacy Carter
Town Manager, Rumford, ME
Email: townmanager@rumfordme.org
Phone: 207-364-4576 Ext 210

Geographic area to benefit the project:

Town of Rumford, Maine

Enforcement action:

This enforcement action was initiated as the result of failed HCl emissions stack tests conducted on Cogen Boilers #6 & #7 on February 15/16, 2017 and March 28/30, 2017. Additional non-compliance findings include exceedances of visible emission limits for the #6 and #7 Cogen Boilers and C-Recovery Boiler, exceedance of the SO₂ emission limit for the C-Recovery Boiler and Cogen Boilers #6 and #7, TRS ventings from the LVHC system, a bleach plant scrubber violation, an ESP downtime violation, a Boiler MACT Work Practice Standard violation, an exceedance of the fuel HCL content standard, a C-Recovery Boiler Smelt Tank Scrubber violation, a recordkeeping violation of fuel delivery to Cogen Boiler #6, a C-Recovery Boiler ESP by-pass violation, and a Lime Kiln emission violation.

During the period of time covered by the ACA, ND Paper Inc. was known as Catalyst Paper Operations, Inc.

Type of project:

This Supplemental Environmental Project is an environmental enhancement project pursuant to 38 M.R.S. § 349(2-A)(1) (Pollution prevention projects that eliminate all or a significant portion of pollutants at the point of generation) and (3) (Environmental enhancement projects in the same ecosystem or geographic area of the violation that significantly improve an area beyond what is required to remediate any damage caused by the violation that is the subject of the

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enforcement action). The focus of this project is to assist the City of Rumford with costly abatement activities and erosion control measures.

Project description:

1. Removal of Asbestos and Hazardous Building Materials at 109 Congress Street: The Town of Rumford owns the Clough & Pilsbury building at 109 Congress Street and last year completed a Phase I Environmental Site Assessment and Hazardous Building Materials Inventory through the Brownfields program administered by AVCOG. The ESA found a minimal amount of asbestos containing material in the building and old stockpiles of hazardous building materials. The Town proposes to remove the asbestos and hazardous building materials using a qualified contractor and dispose of them at a licensed facility.
2. Removal of Suspected Asbestos at 145 Congress Street: The Town Hall for the Town of Rumford has one pipe approximately 80 feet in length with potentially asbestos containing insulation still in place. The Town proposes to remove the material using a qualified contractor and to dispose of the material at a licensed facility.
3. Removal of Asbestos Sewer Pipe Stockpile at 1022 US Route 2: The Public Works Garage has a stockpile of never installed "Transite" type asbestos sewer pipe in the stockpile yards. The Town proposes to have this material removed by a qualified contractor and to dispose of the material at a licensed facility.
4. Morency Park Regrading and Erosion Control: Morency Park on River Street has an area of eroding soil right next to the retention wall. The park is located directly above the Androscoggin River. Soil settling and loss against an existing safety fence and retaining wall has created an uneven grade in the park. Regrading along the retaining wall and replacement with compacted gravel and sand base (3 feet deep by 2 feet wide) covered by loam mix and new grass seeding will reduce soil erosion which drains through cracks and crevices directly into the Androscoggin River.
5. Planting of Ground Coverings and Erosion Control: Visitor and staff parking on River Street at the Town Hall is abutted by a wide strip of dirt and sand which erodes directly in the Androscoggin River during rain events. The exposed soil strip is less than 10 feet from the main channel of the Androscoggin and perched on a steep embankment elevated approximately 30 feet above the mean water level. Continued erosion of this area poses substantial hazards to water quality and public infrastructure. Due to uncontrolled soil erosion and infiltration there is a possibility of sink hole development and a consequent major soil erosion event directly into the river if the area is not properly conserved. The

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Town proposes to remove superficial winter sand accumulation and conserve the existing soil with loam mix and ground covering.

Existing Regulatory Requirements:

SEPs may not be done for activities that are already required by law, 38 M.R.S. § 349(2-A)(B)(2). This is a voluntary project that is not a requirement of any local, state or federal entity. This project does not represent a corrective action of the violations resolved in the Consent Agreement and does not primarily benefit the violator. The projects conducted will benefit the inhabitants of the Town of Rumford and reduce pollution to the Androscoggin River.

Total project budget:

Item	Amount
Transite Sewer Line Safe Disposal	\$4,995.00
Asbestos Survey	\$897.00
Weekend Removal of Basement Piping	\$7,800.00
Riprap for Parking Lot Erosion Control	\$1,656.00
Heavy Duty Fabric for Parking Lot Erosion Control	\$1,198.00
Labor for Parking Lot Erosion Control	\$1,295.20
Gravel for River Street Park Erosion Control	\$972.00
Loam for River Street Park Erosion Control	\$993.60
Equipment Rental for River St Park Erosion Control	\$3,200.00
Pipe/Underdrain River Street Park Erosion Control	\$400.00
Labor for River Street Park Erosion Control	\$2,582.40
109 Congress St Asbestos Removal	\$8,840
TOTAL	\$34,829.20

Project schedule:

Task	Responsible	Due Date
Completion of All Projects	Town of Rumford	06/30/2021

Expected project benefits:

Asbestos removal and disposal by a qualified contractor to a certified facility prevents possible asbestos exposure to, mishandling of or spreading of a hazardous material from its source. The

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Morency Park and Rumford Town Hall projects including regrading and planting ground cover which will reduce erosion from the area that is going into the Androscoggin River.

Reporting:

The Town of Rumford will notify ND Paper upon the completion of each task as listed in the project description above and upon completion of all projects. ND Paper will subsequently notify the Department, in writing, of the same. Notification will include a Summary Report that provides a final accounting of the implemented tasks, including but not limited to a description of the tasks completed, copies of payments made to the Town of Rumford, invoices (certified asbestos contractors), and photographs of erosion control and restoration activities.

Remaining Funds:

At the completion of the project, any funds provided as part of the Administrative Consent Agreement to the Town of Rumford that are not expended as part of this project shall be paid by the Town of Rumford to the *Treasurer, State of Maine*, within 30 days of providing a final report to ND Paper Inc.

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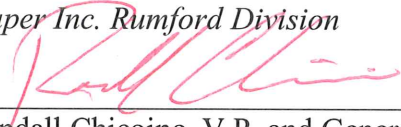
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Certification:

ND Paper Inc. Rumford Division certifies that this proposed SEP project is not result of substantive planning that occurred prior to this enforcement action.

ND Paper Inc. Rumford Division

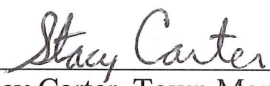
BY: 
Randall Chicoine, V.P. and General Manager
Maine Operations

DATE: 10-29-20

Recipient Acknowledgment:

For and in consideration of the payments described herein the Town of Rumford agrees to perform, or be responsible for obtaining performance of, the services, study, or projects described in this document pursuant to the terms set forth herein and to pay to the Treasurer, State of Maine within 30 days of providing the final report to ND Paper Inc., any remaining funds provided by the Administrative Consent Agreement between ND Paper Inc. and Maine Department of Environmental Protection not expended as part of this project.

Town of Rumford, Maine

BY: 
Stacy Carter, Town Manager
Rumford, ME

DATE: 11-19-2020

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