



JANET T. MILLS
GOVERNOR



MELANIE LOYZIM
ACTING COMMISSIONER

MEMORANDUM

TO: Marc C. Draper, Board Chair of the Board of Environmental Protection
Laura Jensen, Assistant Attorney General

FROM: Jeff Crawford, Director, Bureau of Air Quality
Pete Carleton, Asst. Environmental Engineer, Bureau of Air Quality
Tracy W. Kelly, Compliance Section Manager, Bureau of Air Quality

SUBJECT: Administrative Consent Agreement, ND Paper, Inc./Catalyst Paper Operations
(ND Paper), Rumford, Maine

DATE: December 3, 2020

STATUTE AND RULE REFERENCE:

Air Emissions License (AEL) A-214-70-G-R/A
40 C.F.R. Part DDDDD

LOCATION:

35 Hartford Street, Rumford, Maine

VIOLATOR:

ND Paper, Inc./Catalyst Paper Operations, Inc.

DESCRIPTION:

This enforcement action was initiated as the result of failed hydrogen chloride (HCl) emissions stack tests conducted on Cogen Boilers #6 & #7 on February 15/16, 2017 and March 28/30, 2017. After review of the ND Paper license/compliance file maintained by the Department, enforcement staff discovered several other compliance findings that are included in the enforcement action initiated from the failed stack test. These compliance deficiencies are further discussed in the "Detailed Summary" section below.

DETAILED SUMMARY:

During the period of time covered by the administrative consent agreement, ND Paper, Inc. (ND Paper) was responsible for the following violations:

- Violation 1:** Exceedance of the facility's hydrogen chloride (HCl) emission standard established in 40 C.F.R. Part DDDDD (Boiler MACT) and required by the AEL.
- Violation 2:** Exceedances of the visible emissions limit on the combined stack for the #6 and #7 Cogen Boilers in violation of the AEL.

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- Violation 3:** Exceedances of the visible emissions limit for Recovery Boiler C in violation of the AEL.
- Violation 4:** Exceedance of the SO₂ emission limit for the Recovery Boiler C and Cogen Boilers #6 and #7, in violation of the AEL.
- Violation 5:** ND Paper had a total of three (3) non-exempt total reduced sulfur (TRS) ventings (a procedure to prevent hazardous accumulation of these gases) from the noncombustible gas, low volume, high concentration (LVHC) system in violation of the AEL.
- Violation 6:** ND Paper had a 4-hour block of low flow to the bleach plant scrubber in violation of the AEL.
- Violation 7:** ND Paper had a non-exempt period of electrostatic precipitator (ESP) downtime in violation of the AEL.
- Violation 8:** ND Paper had a 3-hour non-exemptible start-up period during which ND Paper did not operate the minimum number of fields (a component of the electrostatic precipitator, specifically the discharge electrodes), in violation of C.F.R. Part 63, Subpart DDDDD.
- Violation 9:** ND Paper exceeded the fuel HCl content standard established at their most recent compliant performance test, in violation of 40 C.F.R. Part 63, Subpart DDDDD.
- Violation 10:** ND Paper failed to have the C-Recovery Boiler Smelt Tank Scrubber operational, which was due to a weak wash leak explosion, in violation of the AEL.
- Violation 11:** ND Paper failed to record accurate data regarding the solid fuel delivered to the boiler in violation of the AEL.
- Violation 12:** ND Paper failed to have the C-Recovery Boiler explosion dampers properly seated causing some flue gas to be vented through the C-Recovery Boiler Smelt Tank Scrubber, bypassing the C-Recovery Boiler ESP, in violation of the AEL.
- Violation 13:** 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 the AEL.

ENVIRONMENTAL ISSUES:

The violations addressed in this Administrative Consent Agreement resulted in excess emissions to the air, specifically releases of hydrogen chloride (HCL), particulate matter (PM), total reduced sulfur (TRS) compounds, and other gasses, at levels that exceeded standards established in their Air Emission License (AEL) or established by federal

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regulations, as well as failure to maintain proper air pollution controls by not operating equipment according to the AEL.

STAFF RECOMMENDATION:

The Department recommends acceptance of this Administrative Consent Agreement as proposed stipulating a civil monetary penalty of \$79,710.00 with \$44,880.80 paid to the Treasurer, State of Maine and \$34,829.20 paid to the Town of Rumford as part of a Supplemental Environmental Project.

Is the agreement subject to 30-day public comment pursuant to 38 M.R.S. § 347-A(6)?

Yes No

POSTED FOR 30-DAY PUBLIC COMMENT:

Enforcement Coordinator: RM Posting Date: N/A Expires: N/A

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