



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE  
GOVERNOR

PATRICIA W. AHO  
COMMISSIONER

**Woodland Pulp LLC  
Washington County  
Baileyville, Maine  
A-126-71-S-M (SM)**

**Departmental  
Findings of Fact and Order  
Air Emission License  
Amendment #1**

**FINDINGS OF FACT**

After review of the air emissions license minor revision application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

Woodland Pulp LLC (Woodland Pulp) was issued Air Emission License A-126-71-Q-N on February 28, 2012 permitting the operation of electrical generation emission equipment.

Woodland Pulp has requested a minor revision to the facility's air emission license in order to extend the 18 month construction timeframe for converting the biomass boiler to a natural gas unit. An 18 month construction timeframe extension was previously approved through a letter exchange. This subsequent 18 month construction extension request would extend the timeframe to August 28, 2016 and also includes updated ambient air quality modeling requirements.

The equipment addressed in this license is located at 156 Track Road, Baileyville, Maine.

**B. Emission Equipment**

The following equipment is addressed in this air emission license:

**Boiler**

<b>Equipment</b>	<b>Maximum Capacity (MMBtu/hr)</b>	<b>Maximum Firing Rate (scf/hr)</b>	<b>Fuel Type</b>	<b>Date of install.</b>	<b>Stack #</b>
Boiler	190	186,275*	Natural Gas (converted from biomass)	1975	1

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17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
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106 HOGAN ROAD, SUITE 6  
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312 CANCO ROAD  
PORTLAND, MAINE 04103  
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PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769  
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C. Application Classification

This amendment will not increase emissions of any pollutant previously licensed. Therefore, this amendment is determined to be a minor revision and has been processed as such through *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (CMR) 115 (as amended).

II. **BEST PRACTICAL TREATMENT (BPT)**

A. Construction Timeframe Extension

1. Background

Woodland Pulp has requested an 18 month construction timeframe extension to convert the boiler from biomass to natural gas. Woodland Pulp was issued a new air emission license on February 28, 2012 (A-126-71-Q-N) permitting the fuel conversion and operation of an existing boiler which was dormant when purchased from the previous owner. The boiler has an associated steam turbine for the generation of electricity.

Standard condition (3) of air emission license A-126-71-Q-N states:

(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. [06-096 CMR 115]

On August 26, 2013, Woodland Pulp submitted a letter to the Department requesting an 18 month extension of the construction timeframe. The Department responded with a letter dated August 28, 2013, extending the construction timeframe for the fuel conversion by 18 months based on the facility's stated future operating potential and the continued validity of the BACT determination, with the extension ending on February 28, 2015.

Woodland Pulp has submitted a minor revision to address a second 18 month construction extension timeframe. Operations at the north facility have not been initiated, but Woodland Pulp stated that the conversion and start-up of the boiler may become part of the company's overall power producing portfolio. Woodland Pulp operates a separate pulp and paper mill in the vicinity of the facility and the use of the boiler and steam turbine may be used to support existing and future manufacturing operations at Woodland Pulp's mill, including two tissue machines scheduled to start up at the mill site in late 2015 and early 2016.

2. Best Available Control Technology (BACT)

A complete BACT analysis was submitted as part of Woodland Pulp's application to convert and operate the boiler. No new information or new technology for the fuel conversion of the boiler has become available since the December 2011 application. The licensed BACT findings for the boiler continue to be valid, including the firing of natural gas as the sole fuel source, good operating practices, and a NO<sub>x</sub> limit of 0.12 lb/MMBtu.

3. Ambient Air Quality Analysis Requirements

At the time of license issuance (February 28, 2012), the facility was not required to submit an ambient air quality analysis since all of the license limits were below the ambient air quality analysis threshold levels in 06-096 CMR 115. However, the ambient air quality analysis level for NO<sub>x</sub> was lowered from 100 to 50 tons per year with an amendment to 06-096 CMR 115 on December 1, 2012. Woodland Pulp is currently licensed at 99.9 tons/year of NO<sub>x</sub>.

Based on the facts that (1) the boiler has not yet been put into operation since its relicensing to Woodland Pulp and (2) the revised ambient air quality analysis threshold for NO<sub>x</sub> is now 50 tons per year, Woodland Pulp shall be required to address the updated NO<sub>x</sub> ambient air quality analysis requirements prior to start-up of the boiler.

The Department approves the additional 18 month construction timeframe extension for the boiler until August 28, 2016, with the condition that Woodland Pulp exercise one of the following two options:

- an amendment is submitted to restrict NO<sub>x</sub> emissions below 50 tons/year if an ambient air quality analysis will not be performed; or
- an ambient air quality analysis is submitted prior to boiler start-up, demonstrating compliance with ambient air quality standards for the currently licensed scenario.

B. Annual Emissions

1. Total Annual Emissions

This minor revision does not change the total annual licensed emissions from Woodland Pulp. Woodland Pulp shall be restricted to the following annual emissions, based on a 12 month rolling total. The tons per year limits were calculated based on firing 1585 MMcf/year of natural gas and 500 hours/year for each of the two emergency fire pump engines:

**Total Licensed Annual Emissions for the Facility**  
**Tons/year**  
(used to calculate the annual license fee)

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
Boiler	8.08	8.08	4.85	97.00	97.00	8.08
Fire Pump Engines (two total)	0.20	0.20	0.001	2.87	0.62	0.23
<b>Total TPY</b>	<b>8.3</b>	<b>8.3</b>	<b>4.9</b>	<b>99.9</b>	<b>97.6</b>	<b>8.3</b>

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans*, 40 CFR Part 52, Subpart A, §52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO<sub>2</sub>e).

The quantity of CO<sub>2</sub>e emissions from this facility is less than 100,000 tons per year, based on the following:

- the facility's operating and fuel use limits;
- worst case emission factors from the following sources: U.S. EPA's AP-42, the Intergovernmental Panel on Climate Change (IPCC), and 40 CFR Part 98, *Mandatory Greenhouse Gas Reporting*; and
- global warming potentials contained in 40 CFR Part 98.

**ORDER**

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

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

The Department hereby grants Air Emission License A-126-71-S-M subject to the conditions found in Air Emission License A-126-71-Q-N and in the following conditions.

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

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construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

**SPECIFIC CONDITIONS**

- (1) The Department grants an additional 18 month construction timeframe extension to Woodland Pulp to commence construction on the boiler fuel conversion by August 28, 2016, with the following requirement. Woodland Pulp shall either:
- A. submit an amendment to restrict NO<sub>x</sub> emissions below 50 tons/year if the facility determines that an ambient air quality analysis will not be performed; or
  - B. submit an ambient air quality analysis prior to boiler start-up, demonstrating compliance with ambient air quality standards for the currently licensed scenario.

DONE AND DATED IN AUGUSTA, MAINE THIS 2 DAY OF March, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Core for  
PATRICIA W. AHO, COMMISSIONER

**The term of this amendment shall be concurrent with the term of Air Emission License A-126-71-Q-N.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: February 17, 2015

Date of application acceptance: February 18, 2015

Date filed with the Board of Environmental Protection:

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.

