Tambrands, Inc.	)	**Departmental**
Androscoggin County	)	**Findings of Fact and Order**
Auburn, Maine	)	**Air Emission License**
A-44-71-Q-R/A (SM)	)	

After review of the air emissions license renewal 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

1. Tambrands, Inc. (Tambrands) of Auburn, Maine has applied to renew its air emission license permitting the operation of emission sources associated with their Auburn, Maine sanitary paper products manufacturing facility.

2. Tambrands has also requested that their air emissions license be amended to address equipment changes including a new ink jet printing operation and existing equipment that have not been addressed in the facility's previous air emission licenses, including a parts washer and welding room.

B. Emission Equipment

Tambrands is authorized to operate the following equipment:

Fuel Burning Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hr)	Fuel Type, % Sulfur	Date of Manufacture	Stack #
Boiler #1	6.3	42.0	#4 Fuel oil, 1.0%S	1967	1
Boiler #2	6.3	42.0	#4 Fuel oil, 1.0%S	1967	1
Boiler #3	6.3	42.0	#4 Fuel oil, 1.0%S	1973	2
Boiler #4	6.3	42.0	#4 Fuel oil, 1.0%S	1973	2
Boiler #5	6.3	42.0	#4 Fuel oil, 1.0%S	1973	2

Electrical Generation Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hr)	Fuel Type, % Sulfur	Stack #
Generator #2	6.1	44.5	#2 Fuel oil, 0.05%S	4
Fire Pump #1	1.8	14.2	#2 Fuel oil, 0.05%S	10
Fire Pump #2	1.8	14.2	#2 Fuel oil, 0.05%S	11

Process Equipment

Emission Unit #	Type of Equipment	Maximum Raw Material Process Rate (name and rate)	Date of Installation	Stack #	Control Device
79-84	Fiber Processing	1040kg\hr.	2002	Fugitive	2 stage air handling equip; dust filter & bag house
85 & 86	Fiber Processing	520 kg.\hr.	2004	Fugitive	2 stage air handling equip; dust filter & bag house
Pearl	Converting	11270 grams\minute	2002-2006	Fugitive	2 stage air handling equip; dust filter & bag house
West Wing	Converting	3220 grams\minute	2007-2008	Fugitive	2 stage air handling equip; dust filter & bag house

C. Application Classification

The application for Tambrands does not include any increases in current licensed allowed emission levels or limits and does not change any current monitoring or recordkeeping requirements, however, it does include a request to make operational changes. Therefore, the license is considered to be a renewal of current licensed emission units and minor modification and has been processed through Major and Minor Source Air Emission License Regulations, 06-096 CMR 115 (as amended). With the fuel limit on boilers, the operating hours restriction on the emergency generators, and the VOC/HAP emissions limit from the process, the facility is licensed below the major source thresholds and is considered a synthetic minor.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment

(BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Facility Description

Tambrands is a leading manufacturer of feminine products, the production of which requires the use of adhesive and fragrance additives. Tambrands is considering some process changes, which will result in changes to the facility's chemical usage. Tambrands has requested to amend the current air emission license to upgrade their current ink printing system and to include some equipment previously not mentioned in the air emissions license.

Tambrands Inc. uses an air handling and filtration system for the Fiber Processing Department. The system provides control of dust. The air handling equipment consists of two stages of air handling that have 98% capture efficiency in each stage. The system is comprised of two metal screens for fiber recovery, a dust filter and a bag house. The final process step is the rotary pre-filter which screens out long fibers, and returns them to the production line to be used in the process. The pre-filter exhaust proceeds to the rotary pleated belt filter which is utilized for fine fiber filtration. The fine fibers from the pleated belt filter are diverted to the baghouse, filtered and then dropped into a compacting unit. The baghouse has a 98% capture efficiency. The baghouse is equipped with an explosion vent which exhausts outside the building. The Fine Dust Filtration (FDF) system is equipped with pressure drop indicators that will automatically shut down the system if there is a low pressure or high pressure drop across the filter system.

Tambrands, Inc. uses ink to create the package code on the plastic wrapper of its product. Due to the location and configuration of the inkjet head on the manufacturing line, capture and control of emissions from the print process is not feasible. Line air quality testing has been done to insure line areas are within OSHA guidelines for ink coding application.

C. Amendment Description

The following summarizes the modifications to the existing license requested per this amendment:

1. Add a parts washer in the Machine Shop\Small Part Repair Shop. The Machine shop fixes small line parts in the event of an emergency break down. Most of the parts used for plant maintenance are new parts with the occasional emergency repair needed. Parts that require repair typically have some sort of lubrication material oil\grease on them when they arrive in the shop. The site standard is to clean the part before making the repair. The washer will reside in the open area of the Machine Shop and closed when not in use. The washer will meet the applicable requirements of 06-096 CMR 130 (as amended).

2. Add a parts washer in the Rebuild Shop area of the facility. The Rebuild Shop remanufactures parts that are considered normal wear components for the production lines. The parts must be cleaned before rebuild. The parts often have lubrication materials on them prior to cleaning. The washer is an ultrasonic unit and uses a detergent as the cleaning medium. The detergent emits no VOCs or HAPs and the unit uses a filter system to capture contaminants. Therefore this unit is not subject to 06-096 CMR 130 (as amended), however, if solvents that contain VOC/HAP are used this unit will be subject to the applicable requirements of this regulation.

3. Add a Spark Arresting smoke cleaner to the Welding Area. This unit is designed to remove heat and smoke from the welders face during work. The unit has a spark arresting chamber to filter out the air as it is removed from the welders face. The Machine Shop is not a production shop, it makes emergency repairs when new parts are not available. The unit only functions during those type of repairs that require some welding activity and the unit vents to the outside. To meet BACT, the visible emissions from this area will be required to meet the general process opacity limit per 06-096 CMR 101.

4. Add MEK based ink to the site. The site presently uses crayon based ink. That material does not handle line speed well and create smudged coding at the higher operation. The intent of the change is to allow lines to run at a higher rate and still create good quality coding. VOC emissions will increase from this change to the process; however, Tambrands has made changes to other process areas that have reduced VOC emissions facility-wide. Tambrands has not requested an increase in licensed allowed VOC emissions.

5. Reduce the VOC emissions limit from the process areas from the currently allowed 33.1 tons per year to 24 tons per year. Also, recalculated ton per year NOx emissions from the emergency diesel generators has been updated per this air license renewal to 10.2 tpy. The facility will now be below the applicability threshold for reporting under 06-096 CMR 137 (as amended).

D. Existing Fuel-Burning Equipment

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

Boiler Units

Tambrands operates several boilers for facility heating and hot water needs, designated as Boilers #1, #2, #3, #4, and #5. The boilers are each rated at a maximum design heat input capacity of 6.3 MMBtu/hr firing #4 fuel oil with a sulfur content of no greater than 1.0% sulfur by weight. Boilers #1 and #2 are Cleaver Brooks boilers manufactured in 1967 and exhaust to a common stack designated Stack #1. Boilers #3, #4 and #5 are Cleaver Brooks boilers manufactured in 1973 and exhaust to a common stack designated Stack #2.

The units are less than 10 MMBtu/hr and are therefore not subject to the *New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989. The boilers are subject to National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR Part 63 Subpart JJJJJJ).

The regulated pollutants emitted from the #4 oil-fired boilers are particulate matter (PM), particulate matter with a diameter smaller than ten microns (PM_{10}), sulfur dioxide (SO_2), nitrogen oxides (NOx), carbon monoxide (CO), and volatile organic compounds (VOC).

A summary of the BPT analysis for each boiler at Tambrands is the following:

1. The total fuel use for the facility shall not exceed 300,000 gal/year of #4 fuel oil based on a 12-month rolling total.

2. The SO_2 emission limits are based on the firing of #4 fuel oil with a maximum fuel sulfur content no greater than 1.0 % by weight.

3. Fuel Burning Equipment Particulate Emission Standard, 06-096 CMR 103 (as amended) regulates PM emission limits for boilers greater than 3.0 MMBtu/hr. The boilers at Tambrands are all greater than 3.0 MMBtu/hr and

therefore 06-096 CMR 103 (as amended) is applicable. However, the BPT limit will be as stringent and will require PM emissions limit to meet 0.12 lb/MMBtu. The PM_{10} limits are derived from the PM limits.

4. NO_x emission limits are based on data from similar #4 oil fired boilers of this size and age.

5. CO and VOC emission limits are based upon AP-42 data dated 9/03.

6. Visible emissions from Stack #1 and #2 are subject to 06-096 CMR 101 (as amended) of the Department's regulations and shall be restricted to the following:

   a. Visible emissions from stack #1, during periods when only one of the two boilers (Boilers #1 and #2) is operational shall not exceed 20% opacity on a 6-minute block average except, for no more than one 6-minute block average in a 3-hour period.
   b. Visible emissions from stack #1, during periods when both of the two boilers (Boilers #1 and #2) are operational shall not exceed 30% opacity on a 6-minute block average except, for no more than three 6-minute block averages in a 3-hour period.
   c. Visible emissions from stack #2, during periods when only one of the three boilers (Boilers #3, #4 and #5) is operational shall not exceed 20% opacity on a 6-minute block average except, for no more than one 6-minute block average in a 3-hour period.
   d. Visible emissions from stack #2, during periods when more than one of the three boilers (Boilers #3, #4 and #5) is operational shall not exceed 30% opacity on a 6-minute block average except, for no more than three 6-minute block averages in a 3-hour period.

7. Visible emissions from each boiler shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period.

8. The boilers at Tambrands are subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJJ). The units are each rated under 10 MMBtu/hr and are thus not subject to PM, CO, or mercury emission limits from 40 CFR Part 63 Subpart JJJJJJ.

For informational purposes, a summary of the applicable federal 40 CFR Part 63 Subpart JJJJJJ requirements are listed below. The Maine Department of Environmental Protection has not taken delegation of this area source MACT

(Maximum Achievable Control Technology) rule promulgated by EPA, however Tambrands is still subject to the requirements.

- An initial notification must be submitted to EPA no later than September 17, 2011. [40 CFR Part 63.11225(a)(2)]
- A boiler tune-up program shall be implemented to include the tune-up of all applicable boilers by March 21, 2012. [40 CFR Part 63.11196)(a)(1)]
- A Notification of Compliance Status shall be submitted to EPA no later than 120 days after conducting the initial boiler tune-up. [40 CFR Part 63.11225(a)(4)] The Notification of Compliance Status form developed by EPA may be used to submit the required information.
- After the initial tune-up and initial compliance report has been submitted, Tambrands shall implement a biennial boiler tune-up program and submit biennial compliance reports. The following are requirements of the boiler tune-up program:
  - Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up. [40 CFR Part 63.11223(a)]
  - Each biennial tune-up shall include the following, as applicable:
    - Inspection of the burner, cleaning/replacing any component of the burner, as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; however, the burner must be inspected at least once every 36 months. [40 CFR Part 63.11223(b)(1)]
    - Inspection of the flame pattern, and adjustment of the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
    - Inspection of the system controlling the air-to-fuel ratio, to ensure proper calibration and that it is functioning properly. [40 CFR Part 63.11223(b)(3)]
    - Optimization of total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
    - Measurement of concentration in the effluent stream of CO in parts per million (ppm), by volume, and oxygen in volume percent, before and after adjustments are made. [40 CFR Part 63.11223(b)(5)]
  - If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of start-up. [40 CFR Part 63.11223(b)(7)]
- Records shall be maintained consistent with the requirements of 40 CFR Part 63 Subpart JJJJJJ including the following [40 CFR Part 63.11225(c)]: copies of compliance reports; identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and

actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation.

Emergency Generators

Tambrands, Inc. has at its facility an emergency generator (designated Generator #2) and two emergency fire-pump diesel units (designated Fire Pump #1 and Fire Pump #2). Generator #2 has a maximum design heat input capacity of 6.1 MMBtu/hr and was manufactured in 1990. Fire Pumps #1 and #2 have maximum design heat input capacities of 1.8 MMBtu/hr each, and were manufactured in 2000 and 2001 respectively.

The diesel generator and fire pumps were manufactured and installed prior to April 2006; therefore, these units are not subject to New Source Performance Standards 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The emergency generator and fire pumps are applicable to 40 CFR Part 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. Pursuant to 63.6603(a), the units are subject to Tables 2b and 2d of Subpart ZZZZ, including changing the oil and filter every 500 hours of operation or annually (whichever comes first); inspecting all hoses and belts every 500 hours of operation or annually (whichever comes first) and replacing as necessary; and inspecting the air cleaner annually. Compliance with the standard is required by May 3, 2013.

A summary of the BPT analysis for Generator #2 and Fire Pumps #1 and #2 is the following:

1. The emergency generator and fire pumps shall fire only diesel fuel with a maximum sulfur content not to exceed 0.0015% by weight.

2. Tambrands, Inc. shall operate and maintain an hour meter on Generator #2 and Fire Pumps #1 and #2. The generator and fire pumps shall each be limited to 500 hr/yr of operation based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours.

3. 06-096 CMR 106 (as amended) regulates fuel sulfur content, however in this case a BPT analysis for SO_2 determined a more stringent limit of 0.0015% was appropriate and shall be used.

4. The PM and PM_{10} limits are derived from 06-096 CMR 103 (as amended).

5. NO_x, CO, and VOC emission limits are based upon AP-42 data dated 10/96.

6. Visible emissions from each emergency generator and fire pump shall not exceed 20% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period.

7. Tambrands, Inc. will limit Generator #2 and Fire Pumps #1 and #2 to 500 hours of operation per year each, based on a twelve-month rolling total. Generator #2 and Fire Pumps #1 and #2 shall be operated only when normal testing procedures, as recommended by the manufacturer, are being performed or in case of an emergency as defined by the following:

   - Definition of "Emergency"

     "... any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error."

   - By definition, a generator used for load shedding purposes (also known as a "Dispachable Load Generator") is <u>not</u> considered an "Emergency Generator".

E. <u>Process Equipment</u>

Air Handling System

Tambrands Inc. uses an air handling and filtration system for the Fiber Processing Department. The system provides control of dust.

The air handling equipment consists of two stages of air handling that have 98% capture efficiency in each stage. The system is comprised of two metal screens for fiber recovery, a dust filter and a bag house. The final process step is the rotary pre-filter which screens out long fibers, and returns them to the production line to be used in the process. The pre-filter exhaust proceeds to the rotary pleated belt filter which is utilized for fine fiber filtration. The fine fibers from the pleated belt filter are diverted to the baghouse, filtered and then dropped into a compacting unit. The baghouse has a 98% capture efficiency. The baghouse is equipped with an explosion vent which exhausts outside the building. The FDF system is equipped with pressure drop indicators that will automatically shut down the system if there is a low pressure or high pressure drop across the filter system. The airflow from the baghouse is exhausted inside the building. This system will constitute BPT for the process.

The regulated pollutants associated with the operation of this equipment are particulate matter (PM) and particulate matter with a diameter of ten microns and smaller (PM_{10}). PM and PM_{10} emissions from the air handling equipment will amount to approximately 5 TPY.

BPT is also proper maintenance and operation of the system. This shall include maintaining an inspection schedule and maintaining records of maintenance and operations of the filter equipment and baghouses. Record keeping shall consist of maintaining an electronic or manual log of operation of the equipment, which would include documenting periods when the filters and/or the baghouses are malfunctioning or offline for maintenance as well as any maintenance or repair actions taken.

BPT for PM and PM_{10} emissions from the air handling equipment shall be limited to 1.23 lb/hr, which calculates to approximately 5.4 tons per year of PM emissions. Visible emissions from the Air Handling Equipment shall not exceed 10% opacity on a six-minute block average.

VOC and HAP Emissions

Process activities at Tambrands result in the emissions of VOCs and HAPs from the use of glues and fragrances. Tambrands shall be licensed to emit no greater than 24 tons per year (ton/yr) of VOCs based on a twelve-month rolling total and 6.0 tons/yr of HAPs based on a twelve-month rolling total. Tambrands had been previously licensed at a VOC limit of 33.1 tons per year, however, actual VOC emissions from the facility have decreased and the facility has accepted this lower limit and therefore will drop below the threshold for 06-096 CMR 137 reporting.

Due to the low concentration of VOCs applied throughout the many stages of the feminine products manufacturing process, capture and control of VOC emissions through add-on pollution control is not technically or economically feasible.

Tambrands, Inc. uses ink to create the package code on the plastic wrapper of its product. The ink is MEK based which provide the evaporation for drying the ink. Due to the location and configuration of the inkjet head on the manufacturing line, capturing VOCs from the print process is not feasible.

BPT for VOC emissions includes monthly record keeping indicating the amount of fragrance and glue used and the VOC content of the fragrance and glues. BPT also includes maintaining the VOC record on a twelve-month rolling total basis indicating compliance with the VOC emission limit of 24 tons per year generated from the use of glues, inks, and fragrances.

BPT for HAP emissions includes monthly record keeping indicating the amount of fragrance and glue used and the HAP content of the fragrance and glues. BPT also includes maintaining the HAP record on a twelve-month rolling total basis indicating compliance with the HAP emission limit of 6.0 tons per year generated from the use of glues, inks, and fragrances.

F. Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed an opacity of 20%, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20% in any one (1) hour.

G. Annual Facility Emissions

Tambrands shall be restricted to the following annual emissions, based on a 12 month rolling total:

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

Pollutant	Tons/year			
	Boiler Units	Emerg Gens	Process Emissions	Total
PM	2.5	0.4	5.4	**8.3**
PM_{10}	2.5	0.4	5.4	**8.3**
SO_2	21.2	0.3	na	**21.5**
NO_x	8.4	10.2	na	**18.6**
CO	0.8	2.3	na	**3.1**
VOC	0.1	0.8	24	**24.9**
HAPs	na	na	6.0	**6.0**

III. AMBIENT AIR QUALITY ANALYSIS

According to 06-096 CMR 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Modeling is not required for a renewal if the total emissions of any pollutant released do not exceed the following and there are no extenuating circumstances:

Pollutant	Tons/Year
PM	25
PM_{10}	25
SO_2	50
NO_x	100
CO	250

Based on the total facility licensed emissions, Tambrands is below the emissions level required for modeling.

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,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-44-71-Q-R/A subject to 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 construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S.A. §347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [06-096 CMR 115]

(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]

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353-A. [06-096 CMR 115]

(6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]

(7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]

(8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]

(9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]

(10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]

(11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:

1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
2. pursuant to any other requirement of this license to perform stack testing.

B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

C. submit a written report to the Department within thirty (30) days from date of test completion.

[06-096 CMR 115]

(12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:

A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 CMR 115]

(13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]

(14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]

(15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

SPECIFIC CONDITIONS

(16) **Boiler Units**

A. Total fuel use, for Boiler #1, #2, #3, #4 and #5 combined, shall not exceed 300,000 gals/yr. #4 fuel oil with a maximum sulfur content of 1.0% sulfur by weight, based on a twelve-month rolling total. [06-096 CMR 115, BPT]

B. Compliance with the fuel restriction shall be based on fuel records, which shall include receipts from the supplier showing the quantity of fuel delivered and supplier certification indicating the percent sulfur of the purchased fuel. Fuel use records shall be maintained on a monthly basis, in addition to the twelve-month rolling total. [06-096 CMR 115, BPT]

C. Emissions from Boilers #1, #2, #3, #4 and #5 each shall not exceed the following:

Equipment		PM	PM_{10}	SO_2	NO_x	CO	VOC
Boiler #1	lb/MMBtu	0.12	-	-	-	-	-
	lb/hr	0.8	0.8	6.4	2.5	0.8	0.1
Boiler #2	lb/MMBtu	0.12	-	-	-	-	-
	lb/hr	0.8	0.8	6.4	2.5	0.8	0.1
Boiler #3	lb/MMBtu	0.12	-	-	-	-	-
	lb/hr	0.8	0.8	6.4	2.5	0.8	0.1
Boiler #4	lb/MMBtu	0.12	-	-	-	-	-
	lb/hr	0.8	0.8	6.4	2.5	0.8	0.1
Boiler #5	lb/MMBtu	0.12	-	-	-	-	-
	lb/hr	0.8	0.8	6.4	2.5	0.8	0.1

[06-096 CMR 115, BPT & 06-096 CMR 103]

D. Visible emissions:

1. Visible emissions from stack #1, during periods when only one of the two boilers (Boilers #1 and #2) is in operation shall not exceed 20% opacity on a 6-minute block average except, for no more than one 6-minute block average in a 3-hour period. [06-096 CMR 101]

2. Visible emissions from stack #1, during periods when both of the two boilers (Boilers #1 and #2) are in operation shall not exceed 30% opacity on a 6-minute block average except, for no more than three 6-minute block averages in a 3-hour period. [06-096 CMR 101]

3. Visible emissions from stack #2, during periods when only one of the three boilers (Boilers #3, #4 and #5) is in operation shall not exceed 20% opacity on a 6-minute block average except, for no more than one 6-minute block average in a 3-hour period. [06-096 CMR 101]

4. Visible emissions from stack #2, during periods when more than one of the three boilers (Boilers #3, #4 and #5) is in operation shall not exceed 30% opacity on a 6-minute block average except, for no more than three 6-minute block averages in a 3-hour period. [06-096 CMR 101]

(17) **Emergency Generators** (Generator #2, Fire Pump #1, and Fire Pump #2)

A. Generator #2 and Fire Pumps #1 and #2 each shall be limited to 500 hours per year of operation, based on a 12 month rolling total. [06-096 CMR 115, BPT]

B. An hour meter shall be operated and maintained on Generator #2 and Fire Pumps #1 and #2 each. [06-096 CMR 115, BPT]

C. Tambrands shall fire diesel fuel oil with a sulfur content of no greater than 0.05% sulfur by weight in Generator #2 and Fire Pumps #1 and #2. Compliance with the sulfur content restriction shall be demonstrated through purchase receipts or supplier certification indicating the sulfur content of the purchased fuel. [06-096 CMR 115, BPT]

D. Generator #2 and Fire Pumps #1 and #2 shall be operated only when testing procedures, as recommended by the manufacturer or required by law or good manufacturing practices, are being performed or in case of an emergency as defined in the Finding of Fact section of this license. [06-096 CMR 115, BPT]

E. Tambrands shall maintain a log documenting the dates, times and reason of operation for each emergency generator. [06-096 CMR 115, BPT]

F. Emissions from Generator #2 and Fire Pumps #1 and #2 each shall not exceed the following:

Equipment		PM	PM_{10}	SO_2	NO_x	CO	VOC
Generator #2	lb/MMBtu	0.12	-	-	-	-	-
	lb/hr	0.7	0.7	0.3	19.5	5.8	2.1
Fire Pump #1	lb/hr	0.2	0.2	0.1	6.2	1.3	0.5
Fire Pump #2	lb/hr	0.2	0.2	0.1	7.9	1.7	0.6

[06-096 CMR 115, BPT]

G. Visible emissions from Generator #2 and Fire Pumps #1 and #2 each shall not exceed 30% opacity on a six-minute block average, except for 2 six-minute block averages in a 3-hour period. [06-096 CMR 101]

H. The Emergency Generators (Generator #2, Fire Pump #1, and Fire Pump #2) shall meet the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, including the following:

1. No later than May 3, 2013, Tambrands shall meet the following operational limitations for each of the compression ignition emergency generators:

   a. Change the oil and filter annually,
   b. Inspect the air cleaner annually, and

c. Inspect the houses and belts annually and replace as necessary.

A log shall be maintained documenting compliance with the operational limitations.

[40 CFR §63.6603(a) and Table 2(d); and 06-096 CMR 115]

2. No later than October 19, 2013, Tambrands shall meet the following operational requirements for each of the spark ignition emergency generators:

   a. Change the oil and filter annually,
   b. Inspect the spark plugs annually, and
   c. Inspect the hoses and belts annually and replace as necessary.

   A log shall be maintained documenting compliance with the operational requirements.

   [40 CFR §63.6603(a) and Table 2(d); and 06-096 CMR 115]

3. A non-resettable hour meter shall be installed and operated on each generator. [40 CFR §63.6625(f)]

4. Maintenance, Testing, and Non-Emergency Operating Situations

   a. The generators shall each be limited to 100 hours/year for maintenance and testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving or generating income or a financial arrangement with another entity). A maximum of 15 hours per year (of the 50 hours/year) may be used as part of a demand response program. These limits are based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours.
   [40 CFR §63.6640(f)(1) & 06-096 CMR 115]

   b. Tambrands shall keep records that include maintenance conducted on the five generators and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency. If the generators are used for demand response operation, Tambrands must keep records of the notification of the emergency

situation, and the time the engine was operated as part of demand response. [40 CFR §63.6655(e) and (f)]

5. The generators shall be operated and maintained according to the manufacturer's emission-related written instructions or Tambrands shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]

(18) **Process Equipment**

A. Air Handling Equipment

1. All process equipment venting to atmosphere shall be vented through the air handling system (fiber filtering system) and then through one of the baghouses. [06-096 CMR 115, BPT]

2. All components of the air handling system and baghouses shall be maintained in accordance with manufacturer specifications and good manufacturing practices so as to prevent PM/PM_{10} leaks. [06-096 CMR 115, BPT]

3. Tambrands shall maintain an inspection/maintenance log for the air handling system (fiber filtering system) and the baghouses, which shall include an inspection schedule which provides for monthly inspections of the equipment, inspection findings. Electronic or manual records shall be kept of periods when the filters and/or the baghouses are malfunctioning or offline for maintenance as well as any maintenance or repair actions taken. [06-096 CMR 115, BPT]

4. Baghouse explosion vents shall be inspected and maintained as recommended by the manufacturer or good manufacturing practices. Results from inspections and any maintenance actions taken shall be included in the inspection/ maintenance log. [06-096 CMR 115, BPT]

5. Emissions from the air handling equipment shall not exceed the following:

Pollutant	Equipment
PM	1.23 lb/hr
PM_{10}	1.23 lb/hr

[06-096 CMR 115, BPT]

6. Visible emissions from the production line vents shall not exceed 10% opacity on a six-minute block average. [06-096 CMR 101]

B. VOC and HAP Emissions

1. Tambrands shall be limited to no greater than 24 tons per year of VOC emissions from the use of glues, inks, and fragrances based on a twelve-month rolling total. [06-096 CMR 115, BPT]

2. Tambrands shall maintain VOC emissions records on a monthly and twelve-month rolling total keeping indicating the amount of fragrance and glue used and the VOC content of the fragrance, inks, and glues. [06-096 CMR 115, BPT]

3. Tambrands shall be limited to no greater than 6.0 tons per year of HAP emissions from the use of glues, inks, and fragrances based on a twelve-month rolling total. [06-096 CMR 115, BPT]

4. Tambrands shall maintain HAP emissions records on a monthly and twelve-month rolling total keeping indicating the amount of fragrance and glue used and the VOC content of the fragrances, inks, and glues. [06-096 CMR 115, BPT]

(19) **Parts Washers**

Parts washers at Tambrands are subject to Solvent Cleaners, 06-096 CMR 130 (as amended).

A. Tambrands shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]

B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 130]:
   1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
   2. Wipe cleaning; and,
   3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.

C. The following standards apply to cold cleaning machines that are applicable sources under 06-096 CMR 130.
   1. Tambrands shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
      (i) Waste solvent shall be collected and stored in closed containers.
      (ii) Cleaned parts shall be drained of solvent directly back to the cold

cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.

(iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.

(iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.

(v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.

(vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.

(vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material shall be immediately stored in covered containers.

(viii) Work area fans shall not blow across the opening of the degreaser unit.

(ix) The solvent level shall not exceed the fill line.

2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

(20) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed an opacity of 20%, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20% in any one (1) hour. [06-096 CMR 101]

(21) **General Process Sources**

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

(22) Tambrands shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 12th DAY OF September 2011.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie Loyzim for
PATRICIA W. AHO, ACTING COMMISSIONER

Filed
SEP 13 2011
State of Maine
Board of Environmental Protection

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

The term of this Order shall be for five (5) years from the signature above.

Date of initial receipt of application: **August 19, 2009**
Date of application acceptance: **September 11, 2009**

Date filed with the Board of Environmental Protection: _____

This Order prepared by Edwin Cousins, Bureau of Air Quality