



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**International Paper Company
Androscoggin County
Auburn, Maine
A-461-71-L-A**

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

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., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

International Paper Company (IP) was issued Air Emission License A-461-71-K-R/A on April 6, 2012, permitting the operation of emission sources associated with their corrugated container manufacturing facility.

IP has requested an amendment to their license in order to increase the annual fuel cap from 75,000 MMBtu to 85,000 MMBtu.

The equipment addressed in this license is located at 175 Allied Road, Auburn, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type, % sulfur</u>	<u>Install. Date</u>	<u>Stack #</u>
Boiler #1	10.5	69.7 gal/hr	#6 Fuel Oil, 0.50%	1974	1
		72.2 gal/hr	#4 Fuel Oil, 0.50%		
		74.8 gal/hr	#2 Fuel Oil, 0.35%		
		10,460 scf/hr	Natural Gas		
Boiler #3	20.9	139.3 gal/hr	#6 Fuel Oil, 0.50%	2003	2
		144.2 gal/hr	#4 Fuel Oil, 0.50%		
		149.3 gal/hr	#2 Fuel Oil, 0.35%		
		20,491 scf/hr	Natural Gas		

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

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 04679-2094
(207) 764-0477 FAX: (207) 760-3143

C. Application Classification

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the "Significant Emission Levels" as defined in the Department's regulations. The emission increases are determined by subtracting the current licensed emissions preceding the modification from the maximum future licensed allowed emissions, as follows:

<u>Pollutant</u>	<u>Current License (TPY)</u>	<u>Future License (TPY)</u>	<u>Net Change (TPY)</u>	<u>Sig. Level</u>
PM	7.5	8.5	1.0	100
PM ₁₀	7.5	8.5	1.0	100
SO ₂	19.7	22.3	2.6	100
NO _x	18.8	21.3	2.5	100
CO	5.6	6.4	0.8	100
VOC	13.7	14.6	0.9	50

This modification is determined to be a minor modification and has been processed as such.

II. DESCRIPTION OF LICENSE AMENDMENT

A. Amendment Description

IP is operating with an annual fuel cap of 75,000 MMBtu. The allotted fuel is consumed in two boilers, designated Boilers #1 and #3. Each boiler has licensed capability to fire #6, #4 and #2 fuel oil and natural gas. IP has requested that the annual fuel cap be increased to 85,000 MMBtu due to the facility currently running at approximately 75-80% of the fuel limit. An increase in the annual fuel limit will provide IP with more flexibility in their operations.

B. Annual Emissions

1. Total Annual Emissions

Because emissions are dependent on the fuel being fired, and IP wishes to retain licensed capability to fire #6, #4 and #2 fuel oil when natural gas is not available, the facility shall be restricted to the maximum annual emissions from the fuel which gives the highest tons per year quantity for each pollutant. The tons per year of pollutants from fuel oil and natural gas combustion were calculated based on firing 85,000 MMBtu/yr. Due to this limitation, the

highest emissions occur for PM, PM₁₀, SO₂, NO_x and VOC when firing #6 fuel oil in the boilers and CO when firing natural gas in the boilers.

The resulting annual emission limits for the facility based on a 12-month rolling total are as follows:

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

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	HAP
Boilers	8.5	8.5	22.3	21.3	6.4	1.5	--
Printing	--	--	--	--	--	11.1	9.9
Folding/Gluing	--	--	--	--	--	2.0	--
Total TPY	8.5	8.5	22.3	21.3	6.4	14.6	9.9

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 (CO₂e).

Based on the facility's fuel use limit, the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, IP is below the major source threshold of 100,000 tons of CO₂e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

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Auburn, Maine
A-461-71-L-A

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ORDER

The Department hereby grants Air Emission License A-461-71-L-A subject to the conditions found in Air Emission License A-461-71-K-R/A 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 construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

SPECIFIC CONDITIONS

The following shall replace Condition (16)(A) in License A-461-71-K-R/A.

(16) **Boilers #1 and #3**

- A. IP shall be limited to firing a total of 85,000 MMBtu of fuel on a 12-month rolling total. Records from the supplier documenting quantities delivered and the sulfur content of the fuel oils shall be kept for compliance purposes. [06-096 CMR 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 12 DAY OF December, 2012.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

The term of this amendment shall be concurrent with the term of Air Emission License A-461-71-K-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/11/2012

Date of application acceptance: 10/23/2012

Date filed with the Board of Environmental Protection:

This Order prepared by Allison M. Hazard, Bureau of Air Quality.

