



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PAUL MERCER
COMMISSIONER

**S.D. Warren Company
Somerset County
Skowhegan, Maine
A-19-77-9-M**

**Departmental
Findings of Fact and Order
New Source Review
NSR #9**

FINDINGS OF FACT

After review of the New Source Review air emission 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.), Section 344 and Section 590, the Maine Department of Environmental Protection (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	S.D. Warren Company
LICENSE TYPE	06-096 CMR 115, Minor Revision
NAICS CODES	322121
NATURE OF BUSINESS	Pulp and Paper Mill
FACILITY LOCATION	1329 Waterville Road, U.S. Route 201 Skowhegan, Maine

B. NSR License Description

S.D. Warren Company (SDW) has requested a New Source Review (NSR) license to establish federally enforceable 10% annual capacity operating restriction on the Package Boiler to classify the boiler as a "limited use boiler" for the purposes of 40 CFR Part 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*.

C. Emission Equipment

The following equipment is addressed in this NSR license:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Stack</u>
Package Boiler	70.6	504.3	Distillate, 0.15%	Stub stack

D. Definitions

Distillate Fuel. For the purposes of this license, *distillate fuel* means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;
- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

E. Application Classification

The application submitted by SDW restricts the operation of the Package Boiler. This will not result in increased emissions or added equipment. Therefore, the NSR license is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 Code of Maine Rules (CMR) 115 (as amended). The procedures found in 06-096 CMR 115 (as amended) can be utilized to process this application since the proposed revision is not prohibited by the Part 70 air emission license. An application to incorporate the requirements of this NSR license into the Part 70 air emission license shall be submitted no later than 12 months from commencement of the requested operation.

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.

B. Package Boiler Restriction

1. Project Description

The Package Boiler was manufactured by Babcock & Wilcox and has a heat input of 70.6 MMBtu/hr. The boiler is licensed to fire #2 oil, used oil, propane, or kerosene. The exhaust from the Package Boiler is no longer going to the Main Stack and is being directed to the stub stack. Therefore, the sulfur content of any fuel fired in the Package Boiler shall not exceed a maximum of 0.15% by weight.

SDW has requested a 10% annual capacity factor limit on the Package Boiler, categorizing the boiler as a 'limited-use boiler' as defined in 40 CFR Part 63, Subpart DDDDD. 40 CFR §63.7575 defines a limited-use boiler or process heater as "any boiler or process heater that burns any amount of solid, liquid, or gaseous fuels and has a federally enforceable annual capacity factor of no more than 10 percent".

2. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

The Package Boiler is subject to *NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, 40 CFR Part 63, Subpart DDDDD.

As a limited-use boiler, the Package Boiler shall have a federally enforceable license condition limiting the fuel fired in the unit to no more than 10% of the annual capacity factor which is equivalent to 61,845 MMBtu/yr.

The Package Boiler must undergo a tune-up every five years as specified in 40 CFR §63.7540, as applicable based on boiler operation. As a limited-use boiler, the unit is not subject to specific emission limits, the annual tune-up requirement, or the energy assessment requirements in Table 3 of Subpart DDDDD or the operating limits in Table 4 of Subpart DDDDD. [§63.7500(c)] There are no applicable emission limits under this Subpart and thus no corresponding performance test requirements.

The initial tune-up of the Package Boiler must be completed following the procedures described in 40 CFR §63.7540(a)(10)(i) through (iv). If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR §63.7540(a)(13)].

Subsequent tune-ups are required every five calendar years. A compliance report is to be submitted after each tune-up, in accordance with Subpart DDDDD requirements.

Periodic monitoring shall consist of record keeping demonstrating the fuel use records and heat input for the days the boiler was operating.

The Package Boiler shall operate with a 10% annual capacity factor limit, equivalent to a heat input limit of 61,845 MMBtu/yr. Records documenting compliance with the annual capacity factor limit shall be kept on a calendar year basis.

C. Incorporation into the Part 70 Air Emission License

The requirements in this 06-096 CMR 115 New Source Review license shall apply to the facility upon issuance. Per *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended), Section 1(C)(8), for a modification at the facility that has undergone NSR requirements or been processed through 06-096 CMR 115, the source must then apply for an amendment to their Part 70 license within one year of commencing the proposed operations, as provided in 40 CFR Part 70.5.

ORDER

The Department hereby grants New Source Review Minor Revision A-19-77-9-M pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the specific conditions below.

Severability. The invalidity or unenforceability of any provision of this License or part thereof 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

(1) Package Boiler

A. Annual Capacity Limit

The Package Boiler shall not exceed a 10% annual capacity factor limit, equivalent to a heat input of 61,845 MMBtu/year. Records documenting

compliance with the annual capacity factor limit shall be kept on a calendar year basis.

- B. NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Subpart DDDDD)
1. SDW shall comply with all requirements of 40 CFR Part 63, Subpart DDDDD as applicable to the Package Boiler. [40 CFR §63.7485]
 2. SDW shall keep a copy of this federally enforceable license limiting the annual capacity factor to no more than 10 percent and maintain fuel use records for the days the boiler was operating. [40 CFR §63.7555(a)(3)]
 3. The facility shall complete an initial tune-up of the Package Boiler following the procedures described in 40 CFR §63.7540(a)(10)(i) through (vi). [40 CFR §63.7510(e)]
 4. Subsequent tune-ups must be conducted every 5 years, as applicable and as specified in 40 CFR §63.7540. [40 CFR §63.7510(e)]
- (2) SDW shall submit an application to incorporate this NSR license into the facility's Part 70 air emission license no later than 12 months from commencement of the requested operation. [06-096 CMR 140, Section 1(C)(8)]

DONE AND DATED IN AUGUSTA, MAINE THIS 19 DAY OF July, 2016.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:

Marc Allen Robert Carr for
PAUL MERCER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: June 13, 2016

Date of application acceptance: June 13, 2016

Date filed with the Board of Environmental Protection:

This Order prepared by Lisa P. Higgins, Bureau of Air Quality.

