

STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION 17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

DEPARTMENT ORDER

Pixelle Androscoggin LLC Franklin County Jay, Maine A-203-70-AB-A Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #3

FINDINGS OF FACT

After review of the Part 70 License amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Pixelle Androscoggin LLC
LICENSE TYPE	Part 70 Significant License Modification
NAICS CODES	322121
NATURE OF BUSINESS	Pulp & Paper Mill
FACILITY LOCATION	Jay, Maine

Pixelle Androscoggin LLC (Pixelle) is an integrated pulp and paper manufacturing facility that utilizes both chemical and mechanical pulping processes to produce a wide variety of pulp and paper products.

Pixelle has the potential to emit more than 100 tons per year (tpy) of particulate matter (PM), particulate matter under 10 micrometers (PM_{10}), particulate matter under 2.5 micrometers ($PM_{2.5}$), sulfur dioxide (SO₂), nitrogen oxides (NO_X), and carbon monoxide (CO) and more than 50 tpy of volatile organic compounds (VOC); therefore, the source is classified as a major source for criteria pollutants.

Pixelle has the potential to emit 10 tpy or more of a single hazardous air pollutant (HAP) or 25 tpy or more of combined HAP; therefore, the source is classified as a major source for HAP.

Pixelle has submitted an application in accordance with *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 140 to amend existing conditions in Air Emission License A-203-70-G-R/A (issued May 5, 2015) and Air Emission License Amendment A-203-70-W-A (issued June 30, 2017) to update stack testing and continuous emission monitoring requirements to reflect recent operating changes at the mill.

Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #3

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

2

Equipment	Maximum Capacity	Fuel Type	Install. Date	Stack #
Boiler #3	480 MMBtu/hr (biomass) 240 MMBtu/hr (oil or natural gas)	Biomass, #6 oil, distillate fuel, used oil, pulp and paper WWTP sludge, natural gas	1976	PB3
Recovery Boiler #1 (RB1)	2.5 MMlb BLS/day 315 MMBtu/hr	Black liquor, #6 oil,	1965	CBR (Combined
Recovery Boiler #2 (RB2)	3.44 MMlb BLS/day 405 MMBtu/hr	distillate fuel, used oil, natural gas	1975-1976	Recovery Boiler Stack)
A Lime Kiln	80 MMBtu/hr (fuel firing) 248 tons/day calcium oxide (CaO)	Fuel oil (including #6 fuel oil, distillate fuel, specification used oil	1965	LKA
B Lime Kiln	80 MMBtu/hr (fuel firing) 248 tons/day calcium oxide (CaO)	and off-specification used oil), propane pilot gas, natural gas	1975	LKB
#1 Smelt Dissolving Tank (SDT1)	2.5 MMlb BLS/day	N.A.	1965	SDT1
#2 Smelt Dissolving Tank (SDT2)	3.44 MMlb BLS/day	N.A.	1975-1976	SDT2
Bleach Plant A	1819 ADTP/day	NA	1965	Bleach Plant Scrubber
Bleach Plant B	1017 110 11 / day	11.7 1.	1975	Stack

C. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the issued date of this license.

3

The application for Pixelle does not include the licensing of increased emissions; however, the revision of monitoring requirements and stack testing schedules could be considered a relaxation of testing and reporting license terms or conditions. Therefore, the license application is considered to be a Part 70 Significant License Modification processed under *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 140.

II. SIGNIFICANT LICENSE MODIFICATION DESCRIPTION

A. Introduction

On April 15, 2020, Pixelle suffered catastrophic failure of both the A and B Digesters in the pulp mill. With the A and B Digesters inoperable, no black liquor is being generated on-site, and the Kraft pulp and paper liquor cycle has been idled. Black liquor firing has been idled in Recovery Boilers #1 and #2; however, one or both of the Recovery Boilers could fire natural gas to supply steam and power to the mill. The #1 and #2 Smelt Dissolving Tanks will not operate while black liquor firing is idled. The A and B Lime Kilns have been idled. Boiler #3 may also operate in a limited manner.

While the Kraft liquor cycle is idled, certain monitoring and testing requirements present in Pixelle's air emission license are unnecessary and/or redundant. Pixelle has requested a license amendment to update these requirements as described below.

B. Continuous Emission Monitoring

Air Emission License A-203-70-G-R/A (5/5/2015) specifies that SO₂, TRS, and NO_x be monitored continuously in the individual recovery boiler ducts, and SO₂ be monitored continuously in the combined recovery boiler stack. Air Emission License Amendment A-203-70-W-A (6/30/2017) addressed idled operation for RB1, the No. 1 Smelt Dissolving Tank, and the A Lime Kiln. Currently, Pixelle plans to operate RB2 as back-up to the natural gas-fired cogen plant providing power for the facility. The recovery boilers are licensed to fire black liquor, natural gas, and fuel oil. Pixelle intends to fire only natural gas in the recovery boilers while the liquor cycle is idled.

When firing natural gas only, emissions of SO₂ are insignificant and emissions of TRS are expected to be non-existent. Pixelle has stated that it is not practical or necessary to continuously operate and audit (RATA and CGA) the SO₂ and TRS CEMS on the recovery boilers when natural gas is the only fuel being fired. In accordance with 06-096 C.M.R. ch. 117 § (1)(C), the Department may allow compliance with this Chapter using alternate emission monitoring and reporting requirements to satisfy the intent of the Chapter through

an amendment to the facility's air emission license. 06-096 C.M.R. ch. 124, *Total Reduced Sulfur Control from Kraft Pulp Mills*, defines "recovery furnace" as an enclosed combustion device where concentrated black liquor is burned to recover sodium and sulfur and to produce steam for energy recovery. During the period of idled black liquor firing, the recovery boilers are not recovering sodium and sulfur and do not meet the definition of "recovery furnace" for the purposes of being required to monitor TRS.

Pixelle has proposed the following updated monitoring requirements to accommodate periods of firing only natural gas in the recovery boilers:

Pollutant	Applicable Emission Limit	Compliance Method	Frequency
SO	ppmdv limits (individual units only)	SO ₂ CEMS	Continuously when firing black liquor*
SO ₂	lb/hr limit (combined stack only)	SO ₂ CEMS on the shared stack	Continuously when firing black liquor*
TRS	ppmdv limit	TRS CEMS	Continuously when firing or burning black liquor *, **

* The SO₂ and TRS CEMS are not required to be operated when firing natural gas only. Natural gas-only firing is not to be included in the quarterly operating hour threshold for determining when audits and accuracy tests in 06-096 C.M.R. ch. 117 § 4 will be required. Audits and accuracy tests in 06-096 C.M.R. ch. 117 § 4 will not be required in quarters of firing natural gas only.

** When operating as a recovery furnace, black liquor is burned to recover sodium and sulfur to produce steam for energy recovery.

C. Stack Testing

Deferral of stack testing requirements for idled operation of Recovery Boiler #1, Smelt Dissolving Tank #1, and the A Lime Kiln was granted in Air Emission License Amendment A-203-70-W-A (6/30/2017). Pixelle has requested similar consideration for Recovery Boiler #2, the B Lime Kiln, the Bleach Plant Source Group, and Boiler #3 due to the changes in operation caused by the idled liquor cycle.

Pixelle requires flexibility to defer required stack testing for equipment that is idled and cannot be operated in a normal manner. Pixelle has requested that *operating in a normal manner* be defined as firing black liquor solids in the recovery boilers, feeding lime mud to the lime kilns, and feeding pulp to the bleach plant washers and towers. If a source is shutdown and unable to demonstrate compliance before the compliance date due to being idled, the facility has requested that testing be postponed to within six months after coming out of the idle period when equipment returns to normal operation. Pixelle will require this duration of time to restart the Kraft liquor cycle and balance the system of interrelated

equipment within the liquor cycle in order to return to normal operating conditions. *Normal operation*, for the purposes of testing postponement, shall be defined as when the unit is operated for more than 2,190 operating hours during a calendar year (25% of total hours per year).

5

Pixelle has also requested flexibility to defer stack testing for Boiler #3 for periods of idled biomass firing and limited fossil fuel firing. Boiler #3 is only anticipated to run when the Cogeneration Plant is unavailable and is expected to fire fossil fuels only. Previous performance testing during fossil fuel only firing showed average particulate matter emissions of 0.023 and 0.028 lb/MMBtu (4.94 lb/hr and 5.46 lb/hr). These rates are 23 and 28 percent of the PM emission limit of 0.10 lb/MMBtu. When firing fossil fuels only, particulate matter emissions are expected to be a fraction of the existing license limits.

The following table summarizes the stack tests that are affected by changes to the mill's operating configuration.

		Current Testing	
Source	Test	Frequency	Proposed Testing Frequency
Boiler #3	PM limit of 0.10 lb/MMBtu and 48 lb/hr	1 every 2 years	 If Boiler #3 is operating firing biomass, at least once every two calendar years. ** If Boiler #3 is in an idled state for biomass firing, testing can be deferred to within 6 months upon operation of Boiler #3 firing biomass for more than 2,190 operating hours during the calendar year. ** In calendar years that stack testing is required under Subpart DDDDD, the stack testing can be used to show compliance with the particulate matter emissions limits of 0.10 lb/MMBtu and 48 lb/hr.

Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #3

		Current Testing	
Source	Test	Frequency	Proposed Testing Frequency
Recovery Boiler #1 and Recovery Boiler #2 (combined stack)	РМ	1 every 5 years	If RB1 is operating, every 5 years. If RB1 is in an idled state, testing can be deferred to within 6 months upon operation of RB1 firing black liquor solids for more than 2,190 operating hours during the calendar year. If RB2 is operating, every 5 years. If RB2 is in an idled state, testing can be deferred to within 6 months upon operation of RB2 firing black liquor solids for more than 2,190 operating hours during the calendar year.
#1 Smelt Dissolving Tank	РМ	1 every 5 years	If SDT1 is operating, every 5 years. If SDT1 is in an idled state, testing can be deferred to within 6 months upon operation of SDT1 for more than 2,190 operating hours during the calendar year.
#2 Smelt Dissolving Tank	РМ	1 every 5 years	If SDT2 is operating, every 5 years. If SDT2 is in an idled state, testing can be deferred to within 6 months upon operation of SDT2 for more than 2,190 operating hours during the calendar year.
#1 Smelt Dissolving Tank	TRS	1 every 2 years	If SDT1 is operating, every 2 years. If SDT1 is in an idled state, testing can be deferred to within 6 months upon operation of SDT1 for more than 2,190 operating hours during the calendar year.
#2 Smelt Dissolving Tank	TRS	1 every 2 years	If SDT2 is operating, every 2 years. If SDT2 is in an idled state, testing can be deferred to within 6 months upon operation of SDT2 for more than 2,190 operating hours during the calendar year.

6

Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #3

		Current Testing	
Source	Test	Frequency	Proposed Testing Frequency
	РМ	1	If LKA is operating, every 5 years. If LKA is in an idled state, testing can be
A Lime Kiln	NO _x	l every 5 years	deferred to within 6 months upon operation of production of CaO for more than 2,190 operating hours during the calendar year.
B Lime	РМ	1 every 5	If LKB is operating, every 5 years. If LKB is in an idled state, testing can be deferred to within 6 months upon
Kiln	NO _x	years	operation of production of CaO for more than 2,190 operating hours during the calendar year.
Bleach Plant Source Group	ClO ₂ /Cl ₂	1 every 5 years	If the source group is operating, every 5 years. If the source group is in an idled state, testing can be deferred to within 6 months upon operation of pulp bleaching for more than 2,190 operating hours during the calendar year, for the sources that are operational within the source group.

7

Any required stack testing per 40 C.F.R. Part 63, Subparts S, MM, and DDDDD is to be conducted based on representative performance (i.e., performance based on normal operating conditions). [40 C.F.R. § 63.7(e)] Any affected source that was unable to demonstrate compliance before the compliance date due to being idled, or that had demonstrated compliance but was idled during the normal window for the next compliance test, must demonstrate compliance within 6 months after coming out of the idle period and resuming normal operations.

D. Facility Annual Emissions

This license amendment will not change the facility's licensed annual emissions.

ORDER

8

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

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

The Department hereby grants the Part 70 License Amendment A-203-70-AB-A pursuant to 06-096 C.M.R. 140 and the preconstruction permitting requirements of *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 and subject to the conditions found in Air Emission License A-203-70-G-R/A, in amendments A-203-70-V-A and A-203-70-W-A, and the following conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 C.M.R. ch. 115 for making such changes and pursuant to the applicable requirements in 06-096 C.M.R. ch. 140.

For each specific condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

<u>Severability</u>. The invalidity or unenforceability of any provision of this License Amendment or part thereof shall not affect the remainder of the provision or any other provisions. This License Amendment shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

SPECIFIC CONDITIONS

Specific Condition (16)D of Air Emission License A-203-70-G-R/A (5/20/2015), as amended in Air Emission License A-203-70-W-A (6/30/2017), shall be replaced by the following:

(16) **Boiler #3**

D. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boiler #3 shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department.

Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #3

Pollutant	Emission Limit	Compliance Method	Frequency
РМ	lb/MMBtu and lb/hr limits		For the emission limit in Table 2 of 40 C.F.R. Part 63, <u>Subpart</u> <u>DDDDD:</u> Annually, or otherwise in accordance with 40 C.F.R. Part 63, Subpart DDDDD *
		Emissions Testing according to 40 C.F.R. Part 60, Appendix A, Method 5	For the emission limit of <u>0.10 lb/MMBtu and 48 lb/hr:</u> If Boiler #3 is operating firing biomass, at least once every two calendar years **
			If Boiler #3 is in an idled state for biomass firing, testing can be deferred to within 6 months upon operation of Boiler #3 firing biomass for more than 2,190 operating hours during the calendar year.
\mathbf{PM}_{10}	lb/hr limit	Emissions Testing according to 40 C.F.R. Part 60, Appendix A, Method 5	As requested
	lb/MMBtu limit	CEMS	Continuously
SO_2	lb/hr limit	Emissions Testing according to Applicable Method of 40 C.F.R. Part 60, Appendix A	As requested
	lb/MMBtu limit	CEMS	Continuously
NO _x	lb/hr limit	Emissions Testing according to Applicable Method of 40 C.F.R. Part 60, Appendix A	As requested
СО	ppmvd limit	Emissions Testing according to Applicable Method of 40 C.F.R. Part 60, Appendix A; or CEMS if alternative monitoring is selected for Boiler MACT	<u>As requested</u> if stack testing standard is chosen. <u>Annually</u> , or otherwise in accordance with 40 C.F.R. Part 63, Subpart DDDDD *
	lb/hr limit	Emissions Testing according to Applicable Method of 40 C.F.R. Part 60, Appendix A	As requested
VOC	lb/hr limit	Emissions Testing according to Applicable Method of 40 C.F.R. Part 60, Appendix A	As requested
Visible Emissions	opacity limit	40 C.F.R. Part 60, Appendix A, Method 9	As requested

9

Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #3

* In accordance with 40 C.F.R. § 63.7515, if performance tests for a given pollutant for at least two consecutive years show emissions at or below 75% of the emission limit for that pollutant, and if there are no changes in operation of the boiler or air pollution control equipment that could increase emissions, Pixelle may opt to conduct performance testing every third year on this unit. Such option and conditions shall be in accordance with the requirements and specifications of 40 C.F.R. § 63.7515. In accordance with § 63.7515(g), for affected sources that have not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, Pixelle must complete the subsequent compliance demonstration, if subject to the emission limits in Table 2 of Subpart DDDDD, no later than 180 days after the re-start of the affected source and according to the applicable provisions in §63.7(a)(2) as cited in Table 10 of Subpart DDDDD.

10

** In calendar years that stack testing is required under Subpart DDDDD, that stack testing can be used to show compliance with the particulate matter emission limits of 0.10 lb/MMBtu and 48 lb/hr.

[06-096 C.M.R. ch. 140, BPT]

Specific Condition (17)D of Air Emission License A-203-70-G-R/A (5/20/2015), as amended in Air Emission License A-203-70-W-A (6/30/2017), shall be replaced by the following:

(17) **Recovery Boiler #1 and Recovery Boiler #2**

D. Emission Limit Compliance Methods

Compliance with the emission limits for Recovery Boilers #1 and #2 shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department.

Pollutant	Applicable Emission Limit	Compliance Method	Frequency
РМ	gr/dscf and lb/hr limits (combined emissions from RB1 and RB2)	40 C.F.R. Part 60, App. A, Method 5	Once every 5 calendar years. If RB1 is in an idled state, RB1 testing can be deferred to within 6 months upon operation of RB1 firing black liquor solids for more than 2,190 operating hours during the calendar year. * If RB2 is in an idled state, RB2 testing can be deferred to within 6 months upon operation of RB2 firing black liquor solids for more than 2,190 operating hours during the calendar year. *

Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #3

Pollutant	Applicable Emission Limit	Compliance Method	Frequency
PM ₁₀	lb/hr limit (combined emissions from both RBs)	40 C.F.R. Part 60, App. A, Method 5	As requested
SO_2	ppmdv limits (individual units only)	SO ₂ CEMS	Continuously when firing black liquor**
SO_2	lb/hr limit (combined stack only)	SO ₂ CEMS on the shared stack	Continuously when firing black liquor**
NO	ppmdv limits	NO _x CEMS	Continuously
NO _X	lb/hr limits	Emissions Testing	As requested
СО	lb/hr limits	Applicable Method of 40 C.F.R. Part 60, Appendix A	As requested
VOC	lb/hr limits	Emissions Testing according to Applicable Method of 40 C.F.R. Part 60, Appendix A	As requested
Visible Emissions	Opacity limit	COMS monitoring emissions from the common stack	Continuously
TRS	ppmdv limit	TRS CEMS	Continuously when firing or burning black liquor**

11

* If Recovery Boiler #1 or Recovery Boiler #2 starts up and fires only natural gas, particulate matter stack testing will not be required. Natural gas-only firing is not to be included in the annual operating hour threshold for determining when stack testing is required. For any required stack testing per 40 C.F.R. Part 63, Subpart MM, any affected source that was unable to demonstrate compliance before the compliance date due to being idled, or that had demonstrated compliance but was idled during the normal window for the next compliance test, must demonstrate compliance within 6 months after coming out of the idle period and resuming normal operations.

** The SO₂ and TRS CEMS are not required to be operated when firing natural gas only. Natural gas-only firing is not to be included in the quarterly operating hour threshold for determining when audits and accuracy tests in 06-096 C.M.R. ch. 117 § 4 will be required. Audits and accuracy tests in 06-096 C.M.R. ch. 117 § 4 will not be required in quarters of natural gas only firing.

[06-096 C.M.R. ch. 140, BPT]

Pixelle Androscoggin LLC		Departmental
Franklin County		Findings of Fact and Order
Jay, Maine		Part 70 Air Emission License
A-203-70-AB-A	12	Amendment #3

Specific Condition (18)C of Air Emission License A-203-70-G-R/A (5/20/2015), as amended in Air Emission License A-203-70-W-A (6/30/2017), shall be replaced by the following:

(18) Smelt Dissolving Tanks #1 and #2

C. Emission Limit Compliance Methods

Compliance with the emission limits associated with Smelt Dissolving Tanks #1 and #2 shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department.

Pollutant	Applicable Emission Limit	Compliance Method	Frequency
PM	lb/ton BLS fired and lb/hour limits	Emissions testing in accordance with applicable method of 40 C.F.R. Part 60, Appendix A	Once every five years. If SDT1 is in an idled state, testing can be deferred to within 6 months upon operation of SDT1 for more than 2,190 operating hours during the calendar year. * If SDT2 is in an idled state, testing can be deferred to within 6 months upon operation of SDT2 for more than 2,190 operating hours during the calendar year. *
PM_{10}	lb/hour limits		As requested
SO_2	lb/hour limits	Emissions testing in accordance with applicable method of 40 C.F.R. Part 60, Appendix A	As requested
TRS	lb/ton BLS (as H ₂ S) limit	Emissions testing in accordance with applicable method of 40 C.F.R. Part 60, Appendix A	Once every two years. If SDT1 is in an idled state, testing can be deferred to within 6 months upon operation of SDT1 for more than 2,190 operating hours during the calendar year. If SDT2 is in an idled state, testing can be deferred to within 6 months upon operation of SDT2 for more than 2,190 operating hours during the calendar year.
Visible Emissions	opacity limit	Emissions testing in accordance with 40 C.F.R. Part 60, Method 9	As requested

* For any required stack testing per 40 C.F.R. Part 63, Subpart MM, any affected source that was unable to demonstrate compliance before the compliance date due to being idled, or that had demonstrated compliance but was idled during the normal window for the next compliance test, must demonstrate compliance within 6 months after coming out of the idle period and resuming normal operations.

13

[06-096 C.M.R. ch. 140, BPT]

Specific Condition (19)C of Air Emission License A-203-70-G-R/A (5/20/2015), as amended in Air Emission License A-203-70-W-A (6/30/2017), shall be replaced by the following:

(19) **A and B Lime Kilns**

C. Emission Limit Compliance Methods

Compliance with the emission limits associated with A and B Lime Kilns shall be demonstrated in accordance with the methods and frequencies for each unit as indicated in the table below or other methods or frequencies as approved by the Department.

Pollutant	Emission Limit	Compliance Method	Frequency
PM	gr/dscf and lb/hr limits	Emissions testing in accordance with the applicable method of 40 C.F.R. Part 60, Appendix A	Once every five years. If LKA is in an idled state, testing can be deferred to within 6 months upon operation of production of CaO for more than 2,190 operating hours during the calendar year.* If LKB is in an idled state, testing can be deferred to within 6 months upon operation of production of CaO for more than 2,190 operating hours during the calendar year.*
PM_{10}	lb/hr limits		As requested
PM _{2.5}	lb/hr limits		As requested
SO_2	lb/hr limits	Emissions testing in accordance with 40 C.F.R. Part 60, Appendix A, Method 6	As requested

Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #3

Pollutant	Emission Limit	Compliance Method	Frequency
NO _X	ppmv (wet) and lb/hr limits	Emissions testing in accordance with 40 C.F.R. Part 60, Appendix A, Method 7E	 Once every five calendar years. If LKA is in an idled state, testing can be deferred to within 6 months upon operation of production of CaO for more than 2,190 operating hours during the calendar year.** If LKB is in an idled state, testing can be deferred to within 6 months upon operation of production of CaO for more than 2,190 operating hours during the calendar year.**
СО	lb/hr limits	Emissions testing in accordance with the applicable method in 40 C.F.R. Part 60, Appendix A	As requested
VOC	lb/hr limits	Emissions testing in accordance with the applicable method in 40 C.F.R. Part 60, Appendix A	As requested

14

* In accordance with 38 M.R.S. § 589, §§ 2, if visible emissions, operating parameters, federal requirements, or other information indicates the source may be operating out of compliance, additional testing may be required upon request of the Department. Natural gas-only firing or no-load-only firing is not to be included in the annual operating hour threshold for determining when stack testing is required.

If the A or B Lime Kiln is operating periodically as an incinerator only for NCG control or otherwise under no-load conditions, PM stack testing will not be required. For any required stack testing per 40 C.F.R. Part 63, Subpart MM, any affected source that was unable to demonstrate compliance before the compliance date due to being idled, or that had demonstrated compliance but was idled during the normal window for the next compliance test, must demonstrate compliance within 6 months after coming out of the idle period and resuming normal operations.

** If operating parameters, federal requirements, or other information indicates the source may be operating out of compliance, additional testing may be required upon request of the Department. Natural gas-only firing or no-load-only firing is not to be included in the annual operating hour threshold for determining when stack testing is required.

Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #3

If the A or B Lime Kiln is operating periodically as an incinerator only for NCG control or otherwise under no-load conditions, NO_x stack testing will not be required.

	Emission		
Pollutant	Limit	Compliance Method	Frequency
TRS	ppm limit	CEMS – monitoring	Calculate and record daily: 12-hour block average TRS
		TRS concentration on	@ 10% O_2 and O_2 concentrations for the two
		a dry basis and % O_2	consecutive periods of each operating day, determined
		by volume on a dry	as the arithmetic mean of the appropriate 12
		basis of emissions	contiguous, one-hour averages from the CEMS

15

[06-096 C.M.R. ch. 140, BPT]

Specific Conditions (25)C and (25)J of Air Emission License A-203-70-G-R/A (5/20/2015) shall be replaced by the following:

(25) **Bleach Plant Source Group**

C. Compliance with the Cl₂ and ClO₂ lb/hr emission limits shall be demonstrated by stack testing performed once every five years and upon the request of the Department. If the source group is in an idled state, testing can be deferred to within 6 months upon operation of pulp bleaching for more than 2,190 operating hours during the calendar year, for the sources which are operational within the source group.

Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #3

J. Pixelle shall comply with applicable recordkeeping, reporting, and test methods and procedures requirements of Subpart S and as approved in alternative monitoring plans. For any required stack testing per 40 C.F.R. Part 63, Subpart S, any affected source that was unable to demonstrate compliance before the compliance date due to being idled, or that had demonstrated compliance but was idled during the normal window for the next compliance test, must demonstrate compliance within 6 months after coming out of the idle period and resuming normal operations. Normal operation shall be pulp bleaching for more than 2,190 operating hours during the calendar year, for the sources which are operational within the source group. [40 C.F.R. §§ 63.454(g), 63.455(b) and (e), and 63.457]

16

Done and dated in Augusta, maine this 18^{th} day of DECEMBER, 2020.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: for MELANIE LOYZIM, ACTING COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-203-70-G-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: June 17, 2020 Date of application acceptance: June 26, 2020

Date filed with the Board of Environmental Protection:

This Order prepared by Benjamin Goundie, Bureau of Air Quality.

FILED

DEC 18, 2020

State of Maine Board of Environmental Protection