



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

DEPARTMENT ORDER

**Verso Androscoggin LLC  
Franklin County  
Jay, Maine  
A-203-77-24-M**

**Departmental  
Findings of Fact and Order  
New Source Review  
NSR #24**

**FINDINGS OF FACT**

After review of the air emission license 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 (the Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

FACILITY	Verso Androscoggin LLC
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Revision
NAICS CODES	322121
NATURE OF BUSINESS	Pulp and Paper Mill
FACILITY LOCATION	Jay, Maine

**B. NSR License Description**

Verso Androscoggin LLC (Verso) has requested a New Source Review (NSR) license to address in the facility's air emission license a salt cake mix tank which will be returned to service.

**C. Emission Equipment**

This NSR license addresses equipment in the high volume low concentration (HVLC) source group, including the RTO (Regenerative Thermal Oxidizer).

**D. 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.

The application submitted by Verso does not violate any applicable federal or state requirements, does not reduce monitoring, reporting, testing, or recordkeeping requirements, and does not seek to modify a Best Available Control Technology (BACT) analysis.

The proposed revision will not change the facility's emission limits. 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 (C.M.R.) ch. 115. The procedures found in 06-096 C.M.R. ch. 115 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 C.M.R. ch. 100. 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 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

### B. Salt Cake (Na<sub>2</sub>SO<sub>4</sub>) Mix Tank

Salt cake is added to concentrated black liquor before it is introduced into the recovery boiler. Due to changes in mill operation, including reduced bleaching in the pulp mill that produces salt cake, Verso has the need to add purchased salt cake to the liquor cycle to make up chemical loss. To facilitate this, Verso has proposed to restart the use of the salt cake silo in the Power House and to mix the salt cake with either water or black liquor in a salt cake mix tank before introduction of the mixture to the recovery boilers.

The mix tank that will be returned to service is a 2,400 gallon tank located inside the salt cake silo. Because black liquor use is planned in the salt cake mix tank, emissions will be collected and controlled within HVLC non-condensable gas (NCG) collection system. The NCGs include total reduced sulfur compounds (TRS). In accordance with 06-096 C.M.R. Ch. 124, *Total Reduced Sulfur Control from Kraft Pulp Mills*, Verso collects and controls HVLC gas streams containing NCGs, including volatile organic compounds (VOC), hazardous air pollutants (HAP) and TRS compounds, as part of their HVLC system.

Federal regulation 40 C.F.R. § 63.443(c) requires HVLC equipment system emission points to be enclosed, vented to a closed vent system, and then routed to a control device. Verso's HVLC system collects vent gases from the pulp mill brown stock washers and oxygen delignification system, the B Chip Bin, and certain black liquor tanks including the

No. 1 and No. 2 Recovery Boiler Mix Tanks, West Precipitator Mix Tank, East Precipitator Mix Tank, East Economizer Mix Tank, 52% Black Liquor Tank, and 63% Black Liquor Tank. An HVLC collection line will be added to the salt cake mix tank and piped into an existing HVLC line.

BPT for VOC, HAP, and TRS from the black liquor mix tanks is the collection and control of HVLC vent gases within a closed vent collection system and combustion in Verso's RTO. Since the VOC, HAP, and TRS emissions from the salt cake mix tank, when black liquor is used, are to be collected and controlled within Verso's existing HVLC system, they will be receiving BPT. As an alternative operating scenario, water can be added and mixed with the salt cake instead of black liquor. When water is used in the salt cake mix tank, VOC, HAP, and TRS will not be generated, and therefore inclusion in the HVLC system is not required. Verso plans to initially return the mix tank to service on water then transition to black liquor for process efficiency.

C. Incorporation Into the Part 70 Air Emission License

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

D. Annual Emissions

No quantifiable change in emissions is expected as a result of this project.

III. AMBIENT AIR QUALITY ANALYSIS

Verso previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this NSR license.

**ORDER**

The Department hereby grants New Source Review Minor Revision A-203-77-24-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the specific conditions below.

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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) When using black liquor in the salt cake mix tank, Verso shall collect and control emissions in the RTO as part of the HVLC gas collection system, and shall comply with the applicable requirements found in Specific Condition (21) of air emission license A-203-70-G-R/A (issued May 20, 2015). [06-096 C.M.R. ch. 115, BPT]
- (2) Verso 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 C.M.R. ch. 140 § 1(C)(8)]

DONE AND DATED IN AUGUSTA, MAINE THIS 4 DAY OF January, 2019.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Carr for  
MELANIE LOYZIM, ACTING COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 29, 2018

Date of application acceptance: October 30, 2018

Date filed with the Board of Environmental Protection:

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

