



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE  
GOVERNOR

AVERY T. DAY  
ACTING COMMISSIONER

**Catalyst Paper Operations Inc.**  
**Oxford County**  
**Franklin, Maine**  
**A-214-70-H-A**

**Departmental**  
**Findings of Fact and Order**  
**Part 70 Air Emission License**  
**Amendment #1**

**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 Annotated (MRSA), §344 and §590, the Maine Department of Environmental Protection (the Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

FACILITY	Catalyst Paper Operations Inc.
LICENSE TYPE	Part 70 Section 502(b)(10) Change
NAICS CODES	322121
NATURE OF BUSINESS	Pulp and Paper Mill
FACILITY LOCATION	35 Hartford Street, Rumford, Maine

Catalyst Paper Operations Inc. (Catalyst) is an integrated pulp and paper manufacturing facility and is licensed as a major stationary source through its 40 Code of Federal Regulations (CFR) Part 70 license, A-214-70-G-R/A (February 13, 2014).

Catalyst has submitted a 40 CFR Part 70 Section 502(b)(10) Change notification to revise the method to document compliance with annual emissions limits for 17 small, natural gas fired building heaters located throughout the facility.

**B. Emission Equipment**

The following emission units are addressed by this Part 70 license amendment:

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 04769  
(207) 764-0477 FAX: (207) 760-3143

**Natural Gas Building Air Heaters**

<b>Equipment</b>	<b>Max.Capacity (MMBtu/hr)</b>	<b>Maximum Firing Rate (scf/hr)</b>	<b>Installation Date</b>
NG Unit 1	6.54	6,350	2003
NG Unit 2	9.62	9,340	2004
NG Unit 3	5.51	5,353	
NG Unit 4	5.51	5,353	
NG Unit A	2.05	1,992	
NG Unit B	14.11	13,700	2003
NG Unit C	6.41	6,225	2004
NG Unit D	6.32	6,136	
NG Unit E	5.13	4,980	
NG Unit F	4.62	4,482	2004
NG Unit G	6.41	6,225	
NG Unit H	14.12	13,695	
NG Unit I	7.69	7,466	2003
NG Unit J	12.83	12,456	
NG Unit K	7.69	7,470	2004
NG Unit L	6.32	6,136	
NG Unit RB	10.0	9,709	2007

**C. Application Classification**

The Part 70 Section 502(b)(10) Change process may be used for a change that contravenes an express permit term. This process does not allow changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

*Part 70 Air Emission License Regulations, 06-096 CMR 140 (as amended)* allows the use of a Part 70 Section 502(b)(10) Change for changes that are not modifications under 06-096 CMR 140 and that do not cause emissions in excess of the standards in the license (whether expressed therein as a rate of emissions or in terms of total emissions) and qualify as a 502(b)(10) Change under the Clean Air Act.

This notification from Catalyst does not include the licensing of increased emissions or the installation of new or modified equipment. This exchange of a specified compliance demonstration method with an equivalent compliance demonstration method meets the applicability criteria as follows:

- 1) The change does contravene an express license term which was required under the authority of 06-096 CMR 140, BPT.
- 2) The change does not violate applicable requirements or contravene federally enforceable permit terms and conditions, since the authority for the contravened term is Chapter 140, BPT and not based on a federal requirement.

Therefore, the proposed change is considered to be a Part 70 Section 502 (b)(10) Change issued under 06-096 CMR 140 (as amended).

## II. PART 70 SECTION 502(b)(10) CHANGE DESCRIPTION

Catalyst operates 17 natural gas-fired heaters at their Rumford, Maine facility. The dates of original licensure of the units are as follows:

<b>Number of Units</b>	<b>Original License Number</b>	<b>Date of License</b>
4	A-214-70-B-A	August 27, 2003
12	A-214-70-D-A	April 12, 2004
1	A-214-77-3-A	November 7, 2007

In all three of these licenses, the best available control technology (BACT) for each unit was determined to be good combustion control, the use of natural gas fuel, and the individual emission limitations listed in the respective Order for each unit.

The four units originally licensed in 2003 were licensed to operate 8,760 hours/year. For each of the remaining 13 units originally licensed in 2004 and 2007, an operational limit of 5,040 hours per year was included to ensure the addition of the units did not result in cumulative NO<sub>x</sub> emissions increases greater than the significant emissions increase level as defined in 06-096 CMR 100 (i.e., to ensure the addition of the units did not constitute a major modification to the facility), under the authority of 06-096 CMR 140 (Chapter 140), BPT. The limitation of operating hours was determined based on the fuel firing capacity and manufacturer guaranteed-not-to-exceed levels for NO<sub>x</sub> emissions. The facility's current Part 70 license contains the annual limit of 5,040 hours per year in license condition (29) (A)(3) under the authority of Chapter 140, BPT, and requires documentation of the hours of operation for the individual units.

The facility has requested that instead of being required to track hours of operation for the individual units, they be authorized to track total natural gas fuel use per year in the heaters to document equivalent assurance that the annual emissions limitations for the heaters are not exceeded. This change will not alter emission limits for the facility or for any individual units, but shall utilize an equivalent method to demonstrate compliance with the annual emissions limits by tracking the total fuel fired in these units in lieu of the tracking of operating hours for each unit. This change provides a more direct relationship between the recorded data and the quantity

of NO<sub>x</sub> emitted, while also being a more convenient and efficient parameter for the facility to track.

The total allowed annual heat input to the natural gas-fired building heaters was calculated to be 812,808 MMBtu/year, based on the design heat input (MMBtu/hour) and the allowable operating hours for each heater. Catalyst shall document compliance with this limit by records of the fuel consumed on an annual basis.

### **ORDER**

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-214-70-H-A pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 115 and subject to the conditions found in Air Emission License A-214-70-G-R/A and New Source Review licenses issued to the facility, and subject to the following conditions.

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

Severability. 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 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 Specific Condition (29) (A)(3) in Air Emission License A-214-70-G-R/A.

**(29) Building Air Heaters**

A. Fuel

3. The total heat input to the natural gas building heaters shall not exceed 812,808 MMBtu per year. Compliance shall be demonstrated by records of the fuel consumed on a calendar year basis (MMBtu/year). [06-096 CMR 140, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS *12* DAY OF *November*, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Marc Allen Robert Come for*  
AVERY T. DAY, ACTING COMMISSIONER

**The term of this license shall be concurrent with the term of Air Emission License A-214-70-G-R/A.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 22, 2015

Date of application acceptance: October 22, 2015

Date filed with the Board of Environmental Protection:

This Order prepared by Jane E. Gilbert, Bureau of Air Quality.

