



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**Woodland Pulp LLC
Washington County
Baileyville, Maine
A-215-77-9-M**

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

FINDINGS OF FACT

After review of the New Source Review (NSR) 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 | Woodland Pulp LLC (Woodland Pulp) |
| LICENSE TYPE | 06-096 CMR 115, Minor Revision |
| NAICS CODES | 32211 |
| NATURE OF BUSINESS | Pulp Production |
| FACILITY LOCATION | 144 Main Street, Baileyville, Maine |

B. Amendment Description

This NSR Minor Revision is to amend the NSR license issued to Woodland Pulp, A-215-77-7-A (July 5, 2013), NSR #7, to provide clarifying language concerning the types of wood pulped at the facility and the corresponding bleaching sequence used in the manufacturing process.

C. Emission Equipment

The following equipment is addressed in this air emission license:

| <u>Equipment</u> | <u>Production Rate</u> | <u>Primary Raw Materials</u> | <u>Pollution Control Equipment</u> |
|------------------|--|---|------------------------------------|
| Bleach Plant | supports production of approximately 400,000 ADTP/year | Unbleached Pulp, ClO ₂ , NaOH, O ₂ , Hydrogen Peroxide, oxidized white liquor | Bleach Plant Scrubber |

D. Application Classification

The application submitted by Woodland Pulp to provide clarifying language does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements. This application does not seek to modify a Best Available Control Technology (BACT) analysis performed per New Source Review.

The proposed revision will not change the facility's emission limits; therefore, the NSR license amendment 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.

II. MINOR REVISION DESCRIPTION

A. Introduction

Hardwood and softwood pulps have both been produced at the Woodland Pulp mill as a regular practice since at least as far back as the 1970s. Because of physical and chemical characteristics inherently different between the types of pulp, changes achieved in the Bleach Plant may require different bleaching sequences depending on the type of pulp processed. Testing to identify and refine alternate bleaching scenario(s) was conducted and completed under the authorization of NSR #7. There is no expected increase in emissions from this NSR license minor revision, nor is an analysis of Best Practical Treatment (BPT) required for the affected units.

B. Minor Revision Description

Woodland Pulp has requested the addition of specific language to NSR #7 to provide a more complete explanation and understanding of the following:

1. Woodland Pulp typically produces hardwood pulp with periodic runs of softwood species, as has been the Mill's practice from as early as at least the 1970s. Thus, varying pulped wood species between hardwoods and softwoods does not constitute a change of operation at the facility. This production flexibility has been previously established in Maine DEP wastewater permitting; this NSR License Minor Revision accomplishes the same for air permitting.
2. Under the authorization of NSR license A-215-77-7-A (July 5, 2013), Woodland Pulp identified alternate bleaching scenario(s). This was not intended to preclude operation of the Bleach Plant according to previously

utilized and licensed bleaching scenarios. This flexibility in regard to air permitting was understood by the Department at the time of issuance of the July 2013 NSR license, but it was not specifically documented as such. Woodland Pulp may bleach hardwood pulp and softwood pulp using the bleaching scenario appropriate for the type of wood being pulped (i.e., a bleaching sequence of three stages or five stages, as appropriate for either hardwood or softwood pulp) in response to internal or market demands and to obtain quality attributes that may be required at the time.

In all cases, Woodland Pulp will continue to comply with all applicable aspects of 40 CFR Part 63, Subpart S, as specified in NSR license A-215-77-7-A (July 5, 2013), in the facility's Part 70 operating license A-215-70-I-R/A (November 18, 2011), and in subsequently issued NSR licenses or amendments pertaining to the Bleach Plant and applicable Subpart S requirements.

C. Incorporation into the Part 70 Air Emission License

The requirements in this 06-096 CMR 115 NSR license minor revision shall apply to the facility upon issuance. Per *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended), Section 1(C)(8), an application to incorporate the provisions of this NSR license minor revision into the Part 70 air emission license shall be submitted no later than 12 months from commencement of the requested operation, as provided in 40 CFR Part 70.5. Because this NSR license minor revision is to provide clarifying language and does not include a change in operation, the application to incorporate this NSR license minor revision shall be submitted no later than 12 months from the date of issuance of this NSR license minor revision.

ORDER

The Department hereby grants NSR License Minor Revision A-215-77-9-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 Minor Revision or part thereof shall not affect the remainder of the provision or any other provisions. This License Minor Revision 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 language shall replace the first sentence in Specific Condition (1) of NSR License A-215-77-7-A (July 5, 2013).

- (1) Varying pulped wood species between hardwoods and softwoods does not constitute a change of operation at Woodland Pulp. The facility is licensed to modify the existing bleaching system to identify and operate alternate bleaching process scenarios, in accordance with the following:

Section D below shall be added to Specific Condition (1) in NSR License A-215-77-7-A (July 5, 2013). All other subparts of Specific Condition (1) shall remain in effect as written in NSR License A-215-77-7-A unless modified in a future licensing action.

- (1) D. The licensing of alternate bleaching process scenarios established under the authority of this NSR license does not preclude operation of the Bleach Plant according to previously utilized and licensed bleaching scenarios. Woodland Pulp is licensed to process hardwood pulp and softwood pulp in the Bleach Plant using the bleaching scenario appropriate for the type of wood being pulped (i.e., a bleaching sequence of three stages or five stages, as appropriate for either hardwood or softwood pulp) in response to internal or market demands and to obtain quality attributes that may be required at the time.
- (2) Woodland Pulp shall submit an application to incorporate this NSR license minor revision into the Part 70 air emission license no later than 12 months from commencement of the requested operation. [06-096 CMR 140, Section 1(C)(8)] For the purposes of this minor revision, Woodland Pulp shall submit the application within 12 months from the date of issuance of this minor revision.

DONE AND DATED IN AUGUSTA, MAINE THIS 1 DAY OF April, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 11, 2015

Date of application acceptance: March 11, 2015

Date filed with the Board of Environmental Protection:

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

