



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE  
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COMMISSIONER

**Verso Androscoggin LLC**  
**Franklin County**  
**Jay, Maine**  
**A-203-77-17-A**

**Departmental**  
**Findings of Fact and Order**  
**New Source Review**  
**NSR #17**

**FINDINGS OF FACT**

After review of the air emission license amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

**I. REGISTRATION**

A. Introduction

FACILITY	Verso Androscoggin LLC
LICENSE TYPE	06-096 CMR 115, Minor Modification
NAICS CODES	322121
NATURE OF BUSINESS	Pulp & Paper Mill
FACILITY LOCATION	Jay, Maine

Verso Androscoggin LLC (Verso Androscoggin, the Mill) is an integrated pulp and paper manufacturing facility in Jay, Maine owned by Verso Paper Corporation. Operations at the Mill include a full range of manufacturing and supporting activities to produce a wide variety of pulp and paper products. The Androscoggin Mill produces both bleached Kraft pulp from a chemical pulping process and groundwood pulp.

The Androscoggin Mill is an existing stationary source currently operating under a Part 70 License (A-203-70-A-I) and is considered a Part 70 major source, as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). The Mill has the potential to emit more than 100 tons per year (TPY) of particulate matter (PM), particulate matter under 10 micrometers (PM<sub>10</sub>), particulate matter under 2.5 micrometers (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), and carbon monoxide (CO) and 50 TPY of volatile organic compounds (VOC) and 100,000 tons of carbon dioxide equivalent (CO<sub>2e</sub>); therefore, the source is a major source for criteria pollutants. Verso Androscoggin has the potential to emit more than 10 TPY of a single hazardous air pollutant (HAP) or more than 25 TPY of combined HAP; therefore, the source is a major source for HAP.

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B. New Source Review (NSR) License Description

On January 19, 2012, Verso Androscoggin received New Source Review (NSR) Air Emission License A-203-77-13-A authorizing mill modifications to include the capability of firing natural gas in the Lime Kilns, Paper Machine Dryers, and Regenerative Thermal Oxidizer (RTO). The changes met the definition of "major modification" under the Federal major NSR air permitting regulations at 40 CFR Part 52.21(b)(2)(i) and 06-096 CMR 100, and required a Prevention of Significant Deterioration (PSD) permit. The project is referred to as the Natural Gas Conversion (NGC) Project.

In March 2012, Verso submitted a license application to modify the A Digester and wetroom to increase pulp production from the A kraft pulping line. The sources included in the NGC Project (among others) will not be physically modified as part of the Pulp Increase Project but will see increased throughput as a result of the A Digester modifications. The license for the pulp production increase has not yet been finalized.

The NGC Project license includes emission limits for particulate matter (PM) on a concentration basis [0.03 grains per dry standard cubic foot (gr/dscf) of exhaust gas, corrected to 10% oxygen (@ 10% O<sub>2</sub>)], as well as limits for PM<sub>10</sub>, and PM<sub>2.5</sub> on a mass per time (lb/hr) basis (25.5 lb/hr from A Lime Kiln, and 25.0 lb/hr from B Lime Kiln of each of those two pollutants). Based on the results of recent engineering testing trials, Verso Androscoggin requests to modify the gr/dscf PM emission limit for the lime kilns to more accurately represent all actual operating conditions, process variability, fuel mixes, and startup and shutdown scenarios that may occur.

Verso Androscoggin also proposes to implement a federally enforceable 10% combined annual capacity factor limit on Power Boilers #1 and #2. This cap results in contemporaneous emissions decreases for several pollutants when comparing baseline actual emissions from the power boilers to their future potential to emit with the operational cap.

C. Emission Equipment

The following equipment is addressed in this NSR air emission license:

<u>Equipment</u>	<u>Production Rate</u>	<u>Pollution Control Equipment</u>	<u>Stack #</u>
"A" Lime Kiln	248 tons/day CaO	Wet Scrubber	LKA
"B" Lime Kiln	248 tons/day CaO	Wet Scrubber	LKB

Other air emission units addressed in this NSR license amendment are as follows:

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Stack #</u>
Power Boiler #1	680	#6 oil, #2 oil, used oil; not to exceed 1.8% by weight	PB
Power Boiler #2	680		

D. Application Classification

The application to modify the gr/dscf PM emission limit for the lime kilns to more accurately represent all actual operating conditions does not violate any applicable federal or state requirements and does not reduce required monitoring, reporting, testing, or recordkeeping. This application includes a Best Available Control Technology (BACT) analysis for PM emissions from the lime kilns.

This modification to NSR Air Emission License A-203-77-13-A (January 19, 2012) affects changes to only the PM emission rates; the pound per hour PM<sub>10</sub> and PM<sub>2.5</sub> limits shall remain as licensed. Because PM<sub>10</sub> and PM<sub>2.5</sub> emission rates are directly connected to PM emissions, this NSR license amendment includes re-evaluation of the baseline-to-future emissions comparison for PM/PM<sub>10</sub>/PM<sub>2.5</sub> completed for the January 19, 2012 license. BACT for the other pollutants emitted from Lime Kilns A and B was addressed in the above referenced NSR air emission license, the application for such license, and other supporting documentation in the applicant's file in the Bureau of Air Quality.

A modification is identified as major or minor based on whether or not projected net emissions increases exceed the "Significant Emission Increase" levels as given in *Definitions Regulation*, 06-096 CMR 100 (as amended). Net emission increases are determined by subtracting the average actual emissions from the 24 months preceding the modification (or 24 months representative of normal operation) from the future projected actual emissions for each regulated pollutant.

Regulations allow the use of a source's potential to emit (PTE) instead of projected future actual emissions. For the PM Emission Limit Project, Verso Androscoggin has elected to use future potential to emit PM emissions for both the A and B Lime Kilns in the determination of major or minor modification status, consistent with the approach taken for licensing of the NGC Project.

The baseline actual emissions are equal to the actual emissions from any period of 24 consecutive months within the 10 years prior to submittal of a complete license application, and the selected 24-month period can differ on a pollutant-by-pollutant basis. According to 06-096 CMR 100(1)(B), for the purpose of determining whether a net emissions increase has occurred, the facility shall use a

two-year period preceding the application and which is representative of normal operation. Verso Androscoggin has selected the following 24-month baseline periods to quantify baseline PM, PM<sub>10</sub>, and PM<sub>2.5</sub> actual emissions, representative of typical Mill operations with stable operation of the lime kilns over an extended period of time.

<b>Pollutants</b>	<b>24-Month Baseline Period</b>
PM	November 2008 – October 2010
PM <sub>10</sub>	January 2009 – December 2010
PM <sub>2.5</sub>	June 2009 – May 2011

The data and results of this baseline analysis for PM emissions from the A and B Lime Kilns are presented in Table 1. Note: The values in these tables are for the specified equipment and pollutants only. No other equipment at the facility or pollutants from the lime kilns are affected by this NSR license.

<b>Pollutant</b>	<b>Average Past Actual Emissions (tons/year)</b>		<b>Projected Future Actual Emissions (tons/year)</b>	<b>Net Change (tons/year)</b>	<b>Significance Level (tons/year)</b>
	A Lime Kiln	B Lime Kiln			
PM	A Lime Kiln	55.5	56.3	1.0	25
	B Lime Kiln	54.7	54.9		
PM <sub>10</sub>	A Lime Kiln	51.2	56.8	12.5	15
	B Lime Kiln	48.4	55.3		
PM <sub>2.5</sub>	A Lime Kiln	45.9	49.6	10.4	10
	B Lime Kiln	41.7	48.4		

Regulations require that a netting analysis be conducted to account for all creditable, contemporaneous emissions increases and decreases at the facility. The contemporaneous period is defined as the five-year period extending back from the expected date of commencement of construction and the time period between commencement of construction and when the modifications are complete and in operation.

There are two contemporaneous changes at this facility, which Verso Androscoggin has included in the netting analysis:

- the A and B Digester Steam Efficiency project (2009) and
- 10% combined annual capacity factor on Power Boilers #1 and #2 (2012).

A summary of the contemporaneous emissions changes is presented in the following table.

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
<b>Contemporaneous Decreases, TPY</b> [operational cap per this NSR license, 2012]							
Power Boiler #1	96.5	96.5	60.0	1501.0	280.0	1.6 (increase)	0.3
Power Boiler #2	84.5	84.5	53.6	1286.0	241.0	2.2 (increase)	0.1
<b>Contemporaneous Increases</b> [NSR license A-203-77-9-A, 3/30/2010]							
A&B Digester Steam Efficiency Project	--	--	--	--	--	--	20.8
<b>Total Contemporaneous Emissions Changes</b>							
	(180.6)	(180.6)	(113.3)	(2786)	(521.0)	3.8	20.5

Because this NSR license addresses only a change in the PM emission limits, contemporaneous changes are considered hereafter for only PM, PM<sub>10</sub>, and PM<sub>2.5</sub>. Combining the above particulate matter contemporaneous emission changes with the emissions from the PM Emission Limit Project results in the following:

<b>Pollutant</b>	<b>Net Increase, PM Emission Limit Project (ton/year)</b>	<b>Contemporaneous Emissions Changes (ton/year)</b>	<b>Net Projected Changes (ton/year)</b>	<b>Significance Level (ton/year)</b>
PM	1.0	(180.6)	(179.6)	<b>25</b>
PM <sub>10</sub>	12.5	(180.6)	(168.1)	<b>15</b>
PM <sub>2.5</sub>	10.4	(113.3)	(102.9)	<b>10</b>

Therefore, the change in PM emission limits from the lime kilns is determined to be a minor modification to the NSR license A-203-77-13-A issued January 19, 2012, and the 10% annual capacity factor limit on the two power boilers is a minor modification to the source under *Minor and Major Source Air Emission License Regulations* 06-096 CMR 115 (as amended), since the changes being made are not addressed or prohibited in 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.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 CMR 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

A general process description is provided in Air Emission License A-203-77-13-A (January 19, 2012) which describes where the equipment fits into the process.

The following subsections address applicable regulatory requirements with respect to the lime kilns and emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub>. Other emission units and pollutants associated with the NGC Project were addressed in the air emission license and documentation related to that project. Because other pollutants from the lime kilns are not changing as a result of this amendment, they are excluded from further discussion in this document.

B. New Source Performance Standards (NSPS)

Verso Androscoggin's lime kilns are not subject to the NSPS requirements of 40 CFR Part 60, Subpart BB, *Standards of Performance for Kraft Pulp Mills*, which contains requirements for Kraft pulp mill sources constructed (or modified or reconstructed) after September 24, 1976. This project does not include capital expenditure, and thus does not meet the criteria of reconstruction contained in §60.15.

The NGC Project licensed in January 2012 included upgrades to the wet scrubbing systems that control PM emissions from both kilns, designed to reduce the hourly PM emissions to levels well below those emitted by each kiln prior to the scrubber upgrades. The modification of the PM emission limit under this license amendment still results in an overall decrease in the hourly emission rates compared to the emissions prior to the NGC Project. Since the emission limit revisions will not result in a short-term emissions increase in PM, this project does not qualify as a modification under NSPS. Thus, Subpart BB remains not applicable to the kilns.

C. National Emission Standards for Hazardous Air Pollutants (NESHAPs)

The A and B Lime Kilns are subject to NESHAPs requirements, as applicable, found in the following subparts of 40 CFR Part 63:

- Subpart A, *General Provisions*,
- Subpart S, *National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry*, and

Subpart MM, *National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi-chemical Pulp Mills.*

This PM Emission Limit Project does not change the applicability of these Part 63 requirements; therefore, all affected units will continue to comply with the applicable standards. Specifically covered by this license amendment, under the provisions of Subpart MM, the lime kilns are both subject to a PM emission limit of 0.064 gr/dscf @ 10% O<sub>2</sub>. The revised limit in this license is 0.05 gr/dscf @ 10% O<sub>2</sub>.

D. Best Available Control Technology (BACT)

The previously licensed NGC Project qualified as a major modification, since it resulted in a significant net emissions increase for NO<sub>x</sub>. Therefore, a BACT evaluation and an ambient evaluation of the applicable NAAQS levels and PSD Increments were required for NO<sub>x</sub>. A top-down BACT evaluation was also conducted for the other pollutants that did not trigger PSD, in accordance with 06-096 CMR 115 requirements. This license amendment includes a revised BACT evaluation for PM emissions, since revised PM emission limits are the object of this licensing action.

The methodology used in the evaluation to determine BACT follows the “top-down” approach outlined in Chapter B of the U.S. EPA Draft “*New Source Review Workshop Manual*” dated October 1990. According to that document, consistent with the Department’s requirements, a “top-down” BACT analysis contains the following elements:

- Determination of the most stringent control alternatives potentially available.
- Discussion of the technical and economic feasibility of each alternative.
- Assessment of energy and environmental impacts, including toxic and hazardous pollutant impacts, of feasible alternatives.
- Selection of the most stringent control alternative that is technically and economically feasible and that provides the best overall control of all pollutants.

Verso Androscoggin’s BACT analysis identified dry and wet electrostatic precipitators (ESPs) and wet scrubbers as technically feasible control technologies for the lime kilns. Due to the relatively high moisture content in the exhaust stream, dry ESPs were eliminated from further consideration. Upon consideration of the SO<sub>2</sub> emissions from the kilns due to the combustion of NCGs, a wet ESP was deemed to be infeasible because of the minimal control of SO<sub>2</sub> emissions compared to the existing scrubbers. The addition of a wet ESP in conjunction with the existing wet scrubbers was demonstrated to be economically unfeasible, with an incremental cost for PM control exceeding \$17,300 per ton.

Based on these factors, Verso Androscoggin proposed and then implemented an upgrade to the existing wet scrubbers as BACT for the Mill's lime kilns. The wet scrubbers were upgraded to EnviroCare scrubber systems in June and August 2012.

Verso Androscoggin's review of the U.S. EPA's RACT/BACT/LAER Clearinghouse (RBLC) database found that PM emission limits ranged from 0.03 gr/dscf @ 10% O<sub>2</sub> (with no control method description provided) to 0.05 gr/dscf @ 10% O<sub>2</sub> (controlled by a wet scrubber). Verso Androscoggin's BACT analysis for this license, in conjunction with establishing an emission limit which can be met at all times to account for inherent process viability, multiple load conditions and fuel mixes, startup, and shutdown, has proposed PM emission limits as follows:

<b>Unit</b>	<b>PM</b>	<b>PM<sub>10</sub>, PM<sub>2.5</sub></b>
A Lime Kiln	0.05 gr/dscf	25.5 lb/hr
B Lime Kiln	@ 10% O <sub>2</sub>	25.0 lb/hr

The mass emission rates are consistent with existing license limits. The PM BACT limits proposed by Verso Androscoggin are comparable to other BACT emission limits contained in the RBLC for similar types of lime kilns. The proposed gr/dscf limit is more stringent than the PM limit of 0.064 gr/dscf @ 10% O<sub>2</sub> contained in Subpart MM MACT standards.

The Department finds a PM emission limit of 0.05 gr/dscf @ 10% O<sub>2</sub> constitutes BACT for Lime Kiln A and Lime Kiln B.

E. Power Boilers #1 and #2 Annual Capacity Factor Limit

Verso Androscoggin has proposed to cap operation of Power Boilers #1 and #2 to 10% of their combined annual capacity. At 100% capacity and 680 MMBtu/hour each firing No. 6 fuel oil, the total fuel oil fired by these boilers would be 79,424,000 gallons per year. With a 10% combined annual capacity factor, the total fuel oil fired by these boilers is limited to no more than 7,942,400 gallons per year of all fuel oils fired in the two boilers.

Power Boiler #1 and Power Boiler #2 shall operate with a combined 10% annual capacity factor limit, equivalent to a combined total fuel use limit of 7,942,400 gallons/year of fuel oil. Records documenting compliance with the annual average capacity factor limit shall be kept on a calendar year basis.

F. Power Boilers #1 and #2 CEM/COM Requirements

Because the power boilers are limited to 10% annual average capacity factor as of the issuance of this license, some of the CEM/COM requirements will no longer

apply once the Part 70 license is amended to include the changes in this NSR license. The following monitoring and testing requirements will change at that time:

- The opacity monitors on Power Boilers #1 and #2 will no longer be required, per 06-096 CMR 117(B)(1)(b).
- NO<sub>x</sub> CEMS on Power Boilers #1 and #2 will no longer be required. NO<sub>x</sub> CEMS were required per 06-096 CMR 117, 06-096 CMR 138, and 06-096 CMR 140 BPT. However, the Department finds that once the boilers are capped at an annual average capacity factor of 10%, NO<sub>x</sub> CEMS will no longer be required.
- PM stack testing shall be required only upon request by the Department. [06-096 CMR 117(1)(B)(2)]

G. 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 license issuance. Per *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended), Section 2(J)(2)(c), for a modification that has undergone NSR requirements or been processed through 06-096 CMR 115, the source must apply, within one year of commencing the proposed operations, for an amendment to the Part 70 license to include the NSR license requirements, as provided in 40 CFR Part 70.5.

H. Annual Emissions

Total licensed annual emissions for the facility will not change as a result of the PM Emission Limit Project.

### III. AMBIENT AIR QUALITY ANALYSIS

Verso Androscoggin 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 minor modification.

### ORDER

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

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

The Department hereby grants Air Emission License A-203-77-17-A pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the standard and specific conditions below.

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

This condition shall directly replace Specific Condition (1) C of NSR Air Emission License A-203-77-13-A. All other Conditions and all other subparts of Specific Condition (1) shall remain in effect as written in License A-203-77-13-A.

(1) **“A” Lime Kiln**

**C. Emission Limits**

Emissions from the “A” Lime Kiln shall not exceed the following upon completion of the natural gas conversion project with respect to the kiln:

<u>Pollutant</u>	<u>Emission Limit</u>	<u>Units</u>	<u>Origin and Authority</u>
PM	0.05	gr/dscf @ 10% O <sub>2</sub>	06-096 CMR 115, BACT
PM <sub>10</sub> /PM <sub>2.5</sub>	25.5	lb/hr	
SO <sub>2</sub>	6.7 (loaded condition)	lb/hr	
	24 (no load condition*)	lb/hr	
NO <sub>x</sub>	120	ppmv wet @ 10% O <sub>2</sub>	
	33.3	lb/hr	
CO	200	lb/hr	
VOC	1.4	lb/hr	
TRS	20	ppmdv @ 10% O <sub>2</sub> on a 12-hour block average basis	

\* No load condition means the lime kiln is in operation when NCGs are being combusted in the kiln in the absence of lime, and the lime mud feed to the kilns has stopped for a period greater than one hour.

This condition shall directly replace Specific Condition (2) C of NSR Air Emission License A-203-77-13-A. All other Conditions and all other subparts of Specific Condition (2) shall remain in effect as written in License A-203-77-13-A.

(2) **“B” Lime Kiln**

C. **Emission Limits**

Emissions from the “B” Lime Kiln shall not exceed the following upon completion of the natural gas conversion project with respect to the kiln:

<u>Pollutant</u>	<u>Emission Limit</u>	<u>Units</u>	<u>Origin and Authority</u>
PM	0.05	gr/dscf @ 10% O <sub>2</sub>	06-096 CMR 115, BACT
PM <sub>10</sub> /PM <sub>2.5</sub>	25.0	lb/hr	
SO <sub>2</sub>	6.7 (loaded condition)	lb/hr	
	24 (no load condition*)	lb/hr	
NO <sub>x</sub>	120	ppmv wet @ 10% O <sub>2</sub>	
	33.3	lb/hr	
CO	200	lb/hr	
VOC	1.4	lb/hr	
TRS	20	ppmdv @ 10% O <sub>2</sub> on a 12-hour block average basis	

\* No load condition means the lime kiln is in operation when NCGs are being combusted in the kiln in the absence of lime and the lime mud feed to the kilns has stopped without interruption for a period greater than one hour.

The following is a new condition restricting the operation of Power Boilers #1 and #2. All other Conditions in the Part 70 license, subsequent amendments, and NSR licensing pertaining to Power Boilers #1 and #2 shall remain in effect as written unless directly amended within this Specific Condition (3).

(3) **Power Boilers #1 and #2**

A. Annual Capacity Factor Limit

Power Boiler #1 and Power Boiler #2 shall operate with a combined 10% annual capacity factor limit, equivalent to a combined total fuel use limit of 7,942,400 gallons/year fuel oil. Records documenting compliance with the annual average capacity factor limit shall be kept on a calendar year basis.

B. Monitoring Requirements

Once the Part 70 license is amended to include the changes as established in this NSR license, the following monitoring requirements will change for Power Boilers #1 and #2:

1. The opacity monitors on Power Boilers #1 and #2 will no longer be required, per 06-096 CMR 117(B)(1)(b).
  2. NO<sub>x</sub> CEMS on Power Boilers #1 and #2 will no longer be required. [06-096 CMR 117 (B)(2)]
  3. PM stack testing on Power Boilers #1 and #2 shall be required only upon request by the Department. [06-096 CMR 117(1)(B)(2)]
- (4) Verso Androscoggin shall submit an application to incorporate this NSR license amendment into the Part 70 air emission license no later than 12 months from commencement of the requested operation. [06-096 CMR 140, Section 2(J)(2)(c)]

DONE AND DATED IN AUGUSTA, MAINE THIS 31 DAY OF October, 2012.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 9, 2012

Date of application acceptance: October 9, 2012

Date filed with the Board of Environmental Protection:

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

