



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE  
GOVERNOR

PATRICIA W. AHO  
COMMISSIONER

Woodland Pulp LLC  
Washington County  
Baileyville, Maine  
A-215-77-5-A

Departmental  
Findings of Fact and Order  
New Source Review  
NSR #5

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 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Woodland Pulp LLC
LICENSE TYPE	06-096 CMR 115, Minor Modification
NAICS CODES	322121
NATURE OF BUSINESS	Pulp Production
FACILITY LOCATION	144 Main Street, Baileyville, Maine

B. New Source Review Minor Modification Description

Woodland Pulp LLC (Woodland Pulp) has requested a New Source Review (NSR) Minor Modification License to permit the replacement of the No. 4 Paper Machine with a new Tissue Machine with production capacity of approximately 250 air-dried metric tonnes per day (ADMTPD). The new machine will use hot air produced by associated natural gas fired dryers to complete the product drying process. Woodland Pulp does not plan to increase its pulp production capacity to accommodate this unit, but will instead divert a portion of current pulp production from its existing Flakt pulp dryer to the new Tissue Machine.

C. Emission Equipment

The following equipment is addressed in this air emission license:

<u>Equipment</u>	<u>Max.Capacity</u>	<u>Fuel Type</u>	<u>Stack #</u>
Tissue Machine	183 MMBtu/hr	natural gas (in dryer section)	fugitive
No. 9 Power Boiler	740 MMBtu/hr	Several, see license A-215-70-I-R/A	PB

The No. 9 Power Boiler is addressed in this license only in the context of annual emissions caps for certain pollutants. Other licensed descriptions, limitations, and requirements for the No. 9 Power Boiler are not affected by this NSR license.

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D. Application Classification

The application for a new Tissue Machine to replace the No. 4 Paper Machine does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements. This application includes a Best Available Control Technology (BACT) analysis performed per New Source Review.

A modification is identified as major or minor based on whether or not expected 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 of a 24-month period most representative of normal operation within the ten years preceding the modification from the future actual emissions. In accordance with 06-096 CMR 100(1)(B), May 2004 through April 2006 was identified by the source as the consecutive 24-month period representing the highest emissions of all regulated pollutants during normal historic operation of these two units and was thus selected as the actual emissions baseline period.

To determine projected actual emissions prior to construction, Woodland Pulp used the Tissue Machine's potential to emit, based on actual testing data as provided by the manufacturer, for all regulated pollutants other than CO<sub>2</sub>, which was not provided. Projected actual emissions of CO<sub>2</sub> were calculated from the maximum heat input capacity of the drying unit, 8,760 hours per year of operation, and an AP-42 emission factor of 120,000 lb CO<sub>2</sub> per MMscf for external combustion of natural gas.

In order to keep project emissions below the significant emission increase thresholds for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, VOC, and CO<sub>2</sub>, Woodland Pulp is proposing to cap combined emissions of these pollutants from the No. 9 Power Boiler and the new Tissue Machine. No. 9 Power Boiler recently converted from No. 6 fuel oil to natural gas and has emission reductions that will enable the total future emissions of both units to remain below the significant emissions increase levels, in order to classify this project as a minor modification. Thus, baseline actual emissions of PM and VOC for No. 4 Paper Machine - the only two pollutants emitted by this unit - were determined, and baseline actual emissions of PM, NO<sub>x</sub>, VOC, and CO<sub>2</sub> were determined for No. 9 Power Boiler.

Although the most recent U.S. EPA guidance related to biogenic emission deferral does not require the inclusion of biogenic sources of CO<sub>2</sub>e in the quantification of greenhouse gases from fuel combustion, CO<sub>2</sub>e emissions from the No. 9 Power Boiler quantified in the following table include CO<sub>2</sub>e from fuel oil, natural gas, and biogenic fuel CO<sub>2</sub> sources (hog fuel).

The results of the comparison of combined actual baseline emissions from the No. 9 Power Boiler and the No. 4 Paper Machine to combined, future, actual emissions from the No. 9 Power Boiler and the new Tissue Machine are as follows:

<b>Pollutant</b>	<b>Baseline Actual Emissions (tons/year)</b>	<b>Baseline Actual Emissions* 5/04 – 4/06 (tons/year)</b>	<b>Projected Actual Emissions** (tons/year)</b>	<b>Net Change (tons/year)</b>	<b>Significance Level (tons/year)</b>
PM, PM <sub>10</sub> , PM <sub>2.5</sub>	From No. 4 PM: 6.5	204.6	213.6 (cap)	+ 9.0	25, 15, 10
	From No. 9 PB: 198.1				
SO <sub>2</sub>	From No. 4 PM: 0	0.0	1.0	+ 1.0	40
NO <sub>x</sub>	From No. 4 PM: 0	585.8	624.8 (cap)	+ 39.0	40
	From No. 9 PB: 585.5				
CO	From No. 4 PM: 0	0.0	79.0	+ 79.0	100
VOC	From No. 4 PM: 4.5	20.5	59.5 (cap)	+ 39.0	40
	From No. 9 PB: 16.0				
CO <sub>2</sub> e	From No. 4 PM: 0	250,869.1	325,369.1 (cap)	+ 74,500	75,000
	From No. 9 PB: 250,869.1				

\* With the exceptions of SO<sub>2</sub> and CO, Baseline Actual Emissions values are the combined emissions from the No.9 Power Boiler and the No. 4 Paper Machine. Baseline Actual Emissions values for SO<sub>2</sub> and CO are from the No. 4 Paper Machine alone.

\*\* With the exceptions of SO<sub>2</sub> and CO, Projected Actual Emissions values are the combined emissions from the No. 9 Power Boiler and the new Tissue Machine. Projected Actual Emissions values for SO<sub>2</sub> and CO are from the new Tissue Machine alone.

Note: The above numbers are for the No. 9 Power Boiler, the No. 4 Paper Machine, and the new Tissue Machine only. No other equipment at the facility is affected by this license.

This NSR license is determined to be a minor modification to the source under *Minor and Major Source Air Emission License Regulations* 06-096 CMR 115 (as amended) based on the following findings:

- The changes being made are not addressed or prohibited in the existing Part 70 air emission license.

No net change in tons per year emissions for any pollutant will exceed the significance level, as demonstrated above.

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 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

### Project Description

The new Tissue Machine is designed with a production capacity of approximately 250 ADMTPD. The No. 4 Paper Machine which the new Tissue Machine is replacing operated at a production rate between 200 and 450 ADTPD, depending on the basis weight of the paper being produced. Lighter weight papers often ran at 200-250 ADTPD, comparable to the Tissue Machine production capacity. There was no fuel burning equipment associated with the No. 4 machine; steam from the central header was used to drive the machine and to heat the dryer section drums. Paper Machine No. 4 was permanently shut down in June 2007 and was completely dismantled in 2010.

The new Tissue Machine will include the installation of natural gas fired dryers to produce high temperature air to finish the drying of the sheet. The natural gas dryers are rated with a heat input capacity of 183 MMBtu/hour.

### B. BACT Determination

The following is a summary of the BACT determination for the Tissue Machine, by pollutant.

1. Particulate Matter (PM, PM<sub>10</sub>, & PM<sub>2.5</sub>)

Vent gases from paper machines often contain trace amounts of PM. The quantity of PM is difficult to measure due to the low PM concentrations and high exhaust gas flow rates. Particle size is difficult to discern due to entrained water vapor. PM emissions from tissue machines are generally higher than PM emissions from paper machines due to the use of a doctor blade to separate the tissue sheet from the dryers. PM emissions from the Tissue Machine also include emissions generated from the dryers firing natural gas.

Because of the high volume and high moisture content of the Tissue Machine vent exhaust gases, add-on control techniques for these vents are economically infeasible. Wet scrubbers have been employed to control PM emissions from tissue crepe operations on Yankee dryers; however, technology used in this process is different from the through-air drying (TAD) technology expected to be employed by Woodland Pulp's new machine.

A limit of 6.4 lb/hour is proposed by Woodland Pulp based on the ton/year testing data provided by the manufacturer and assuming 8,760 hours/year of operation. The equivalent value in lb/MMBtu is lower than Boiler Maximum Achievable Control Technology (MACT) requirements, assuming the PM is based on combustion emissions alone. The Department recognizes that a portion of these PM emissions originate in the tissue making process separate from fuel burning.

*General Process Source Particulate Emission Standard*, 06-096 CMR 105, contains an applicable PM emission limit of 15.35 lb/hour for the Tissue Machine and associated dryers, calculated using a process weight of 10.42 tons/hour (equivalent to 250 tons/day, assuming 24-hour/day operation of the Tissue Machine and associated dryers) and the equation found in 06-096 CMR 105.

Because the primary purpose of fuel burning in the Tissue Machine and associated dryers is not to produce heat and power, from the definition of "fuel-burning equipment" as found in 06-096 CMR 100, *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 particulate emission limits do not apply to this unit.

The Department finds good combustion practices with a limit of 6.4 lb/hour constitute BACT for PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the new Tissue Machine and the associated dryers firing natural gas.

2. Sulfur Dioxide (SO<sub>2</sub>)

Sulfur dioxide emissions from the Tissue Machine are attributable to the oxidation of sulfur compounds in the natural gas fired to dry the product. The options to control SO<sub>2</sub> emissions from fuel combustion include low sulfur fuel and add-on treatment of the combustion exhaust gases.

Based on review of the RACT/BACT/LAER Clearinghouse (RBLC), EPA's AP-42 database, and other Maine DEP air licenses, add-on controls for SO<sub>2</sub> emissions from direct-fired dryer paper machines of similar size firing natural gas were not identified. Due to the inherently low sulfur content of natural gas, additional SO<sub>2</sub> control from natural gas combustion is not economically feasible.

The Department finds good combustion controls with a limit of 0.23 lb/hour, based on the ton/year testing data provided by the manufacturer and assuming 8,760 hours/year of operation, constitute BACT for SO<sub>2</sub> emissions from the Tissue Machine with associated dryers firing natural gas.

3. Nitrogen Oxides (NO<sub>x</sub>)

Emissions of NO<sub>x</sub> from the Tissue Machine are attributable to the oxidation of nitrogen in the combustion air and the oxidation of nitrogen compounds contained in the natural gas used to generate hot air in the dryer section of the machine.

Options for controlling NO<sub>x</sub> emissions from the unit include combustion control, selective catalytic reduction (SCR), and selective non-catalytic reduction (SNCR).

Additional control technology for this unit is economically infeasible. Review of recent, similar projects did not identify any required add-on controls. The Department finds the use of good combustion controls with a limit of 16.44 lb/hour, based on the ton/year testing data provided by the manufacturer and assuming 8,760 hours/year of operation, constitute BACT for NO<sub>x</sub> emissions from the Tissue Machine with associated dryers firing natural gas.

4. Carbon Monoxide (CO)

The formation of CO occurs as a result of incomplete combustion of organic compounds contained in the natural gas used to generate hot air for drying the product.

No CO emissions control technologies were identified that are technically feasible for application to this unit. This is consistent with the findings regarding control technologies employed on other direct-fired dryer paper machines. The Department finds that using good combustion practices and a CO emissions limit of 18.04 lb/hour, based on the ton/year testing data provided by the manufacturer and assuming 8,760 hours/year of operation, represent BACT for CO emissions from the Tissue Machine with associated dryers firing natural gas.

5. Volatile Organic Compounds (VOC)

Emissions of VOCs from the Tissue Machine can be attributed to many different sources. VOCs are present in the water carrying the pulp to the tissue machine and can be released as the water is removed from the sheet. The most often detected compound is methanol, a byproduct of chemical and mechanical pulping and bleaching processes. VOCs are sometimes present in papermaking additives, such as defoamers, slimicides, retention aids, wet strength agents, wire and felt cleaners, etc. and can be released in the papermaking process. Paper machines with direct-fired dryers, such as this Tissue Machine, also emit VOCs from the combustion of the fuel.

Add-on controls for emissions of VOCs from paper machine vents are not economically feasible because of the small pollutant concentrations, the high moisture content, and the high volume of the vent exhaust gases. No technically feasible VOC emissions control technologies for application to this unit for were identified. This is consistent with findings regarding control technologies employed on other, direct-fired dryer paper machines.

The facility has proposed a VOC emission limit of 11 lb/hour, based on the ton/year testing data provided by the manufacturer, as BACT for VOC emissions from the Tissue Machine. Compliance with the annual cap of combined VOC emissions from the Tissue Machine and the No. 9 Power Boiler shall be maintained at all times.

Based on the above information, the Department finds that minimizing the VOC content of papermaking additives and using good combustion practices with a limit of 11 lb/hour constitutes BACT for VOC emissions from the Tissue Machine with associated dryers firing natural gas.

6. Greenhouse Gases (GHG)

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans*, 40 CFR Part 52, Subpart A, §52.21 Prevention of

Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, GHG are calculated and reported as carbon dioxide equivalents (CO<sub>2</sub>e).

GHG emissions from the Tissue Machine are attributable to the hot air dryers which emit CO<sub>2</sub> as a product of the combustion of hydrocarbons in fossil fuels such as natural gas. No GHG emissions control technologies were identified that are technically feasible for application to this unit. This is consistent with the findings regarding control technologies employed at other “on-machine” dryer units.

Based on the above information, the Department finds that good operation and maintenance practices to maximize dryer efficiency is BACT for GHG emissions from the Tissue Machine with associated dryers firing natural gas.

C. Emission Limits

The BACT emission limits for the Tissue Machine and associated dryers firing natural gas are the following:

<u>PM,</u> <u>lb/hr</u>	<u>PM<sub>10</sub>,</u> <u>lb/hr</u>	<u>PM<sub>2.5</sub></u> <u>lb/hr</u>	<u>SO<sub>2</sub>,</u> <u>lb/hr</u>	<u>NO<sub>x</sub>,</u> <u>lb/hr</u>	<u>CO,</u> <u>lb/hr</u>	<u>VOC,</u> <u>lb/hr</u>
6.4	6.4	6.4	0.23	16.44	18.04	11

Visible emissions from the Tissue Machine and associated fuel burning equipment shall not exceed 10% opacity on a six-minute block average basis, except for no more than one six-minute block average in a continuous three-hour period. [06-096 CMR 101]

D. Cap Compliance Documentation

Woodland Pulp shall maintain records on a monthly basis demonstrating the combined 12-month rolling total of emissions from the Tissue Machine and the No. 9 Power Boiler do not exceed the licensed cap. Because the facility recently completed a fuel conversion project on No. 9 Power Boiler equipping it to burn natural gas, Woodland Pulp does not expect the emission caps to interfere with normal plant operations and shall maintain compliance with these caps at all times.

Woodland Pulp proposes to use the following compliance calculation methodologies to demonstrate compliance with the specified emission caps:

PM Emissions from the Tissue Machine and No. 9 Power Boiler

Monthly values shall be calculated using the following data and factors:

<u>Production Data</u>	<u>Factor</u>	<u>Source of Factor</u>
No. 9 Power Boiler fuel use records and fuel heat content values	lb PM/MMBtu	Representative stack testing results, AP-42, and/or NCASI emission factors
Monthly tissue production rate, air dried tons final product (ADTFP)	0.614 lb/ADTFP	This factor was calculated based on the manufacturer's proposed BACT limit of 6.4 lb/hr, 250 ADTFP/day, and the assumption of 24 hr/day production.

The 12-month rolling total shall not exceed 213.6 tons/year PM emissions.

NO<sub>x</sub> Emissions from the Tissue Machine and No. 9 Power Boiler

Monthly values shall be calculated using the following data and factors:

<u>Production Data</u>	<u>Factor</u>	<u>Source of Factor</u>
monthly total CEM calculated NO <sub>x</sub> emissions from No. 9 Power Boiler	--	--
monthly natural gas use by the Tissue Machine	91.6 lb/MMscf	This factor was calculated based on the manufacturer's proposed BACT limit of 16.44 lb/hr, 250 ADTFP/day, and the assumption of 24 hr/day production.

The 12-month rolling total shall not exceed 624.8 tons/year NO<sub>x</sub> emissions.

VOC Emissions from the Tissue Machine and No. 9 Power Boiler

Monthly values shall be calculated using the following data and factors:

<u>Production Data</u>	<u>Factor</u>	<u>Source of Factor</u>
monthly fuel use in No. 9 Power Boiler	5.5 lb/MMscf	AP-42, Table 1.4-2 (dated 7/98); emission factor for VOC from natural gas combustion
	0.76 lb/1000 gal	AP-42, Table 1.3-3 (dated 5/10); emission factor for VOC from No. 6 fuel oil combustion
	0.017 lb/MMBtu	AP-42, Table 1.6-3 (dated 9/03); emission factor for VOC from biomass combustion
monthly tissue production rate, ADTFP	0.6 lb/ADTFP	NCASI *

\* NCASI Technical Bulletin 681: *Volatile Organic Emissions from Pulp and Paper Mill Sources, Part VII – Pulp Dryers and Paper Machines at Integrated Chemical Pulp Mills*. 1994. Table VI.A.I, worst case emission factor of all sources tested.

The 12-month rolling total shall not exceed 59.5 tons/year VOC emissions.

CO<sub>2</sub>e Emissions from the Tissue Machine and No. 9 Power Boiler  
 Monthly values shall be calculated using the following data and factors:

<u>Production Data</u>	<u>Factor</u>	<u>Source of Factor</u>
monthly fuel use in No. 9 Power Boiler	120,000 lb/MMscf	AP-42, Table 1.4-2 (dated 7/98), emission factor for CO <sub>2</sub> from natural gas combustion
	25,000 lb/1000 gal	AP-42, Table 1.3-12 (dated 5/10), emission factor for CO <sub>2</sub> from No. 6 fuel oil combustion
	195 lb/MMBtu*	AP-42, Table 1.6-3 (dated 9/03), emission factor for CO <sub>2</sub> from biomass combustion
monthly natural gas use by the Tissue Machine	120,000 lb/MMscf	AP-42, Table 1.4-2 (dated 7/98), emission factor for CO <sub>2</sub> from natural gas combustion

\* Qualifying biogenic fuel may be excluded from the quantification of CO<sub>2</sub>e gases as determined by the Department on a case by case basis.

The 12-month rolling total shall not exceed 325,369.1 tons/year CO<sub>2</sub>e emissions.

E. 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.

F. Annual Emissions

Woodland Pulp shall be restricted to the following annual emissions, based on a 12-month rolling total.

**Total Licensed Annual Emissions for the Facility<sup>a</sup>**

**Tons/year**

(used to calculate the annual license fee<sup>b</sup>)

	<u>PM</u>	<u>PM<sub>10</sub></u>	<u>SO<sub>2</sub></u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>VOC</u>	<u>TRS</u>
Tissue Machine	--	--	1.0	--	79.0	--	--
Tissue Machine and No. 9 Power Boiler Combined	213.6	213.6	--	624.8	--	59.5	--
No. 9 Power Boiler	--	--	676	--	5008	--	--

	<u>PM</u>	<u>PM<sub>10</sub></u>	<u>SO<sub>2</sub></u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>VOC</u>	<u>TRS</u>
#3 Recovery Boiler	189	189	1567	601	983	176	--
Smelt Dissolving Tank	50	50	--	--	--	--	13.6
Lime Kiln	87	87	35	175	1750	--	--
Package Boiler	56	56	9.9	5.6	1.4	0.1	--
NCG Incinerator	8.4	8.4	12.7	39.6	2.8	0.2	--
<b>TOTALS</b>	<b>604.0</b>	<b>604.0</b>	<b>2301.6</b>	<b>1178.0<sup>c</sup></b>	<b>7824.2</b>	<b>235.8</b>	<b>13.6</b>

- Emissions limits in the table do not include insignificant activities and process units (e.g. woodyard) which have no licensed emission limits.
- PM<sub>10</sub>, CO, and TRS are not used in the calculation of the annual fee but are included in this table for completeness.
- Please note that the total NO<sub>x</sub> limit for the mill is less than total allowable emissions from individual units. Woodland Pulp may emit up to each required limit for any one individual unit, provided that the total of all units does not exceed the mill wide total of 1178.0 ton/yr (on a 12-month rolling total basis). See License A-215-70-I-R/A, Condition (17), issued November 18, 2011.

### III. AMBIENT AIR QUALITY ANALYSIS

Woodland Pulp 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 (License A-215-71-AC-A, dated October 6, 1999). 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, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-215-77-5-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**

The following are new conditions, supplementary to the conditions found in Air Emission License A-215-70-I-R/A (dated November 18, 2011) and Air Emission License Amendment A-215-70-K-A (dated April 23, 2012).

(1) **Tissue Machine**

- A. Woodland Pulp is licensed to replace the No. 4 Paper Machine with a new Tissue Machine, with production capacity of approximately 250 air-dried metric tonnes per day (ADMTPD). The new machine shall use hot air produced by associated natural gas fired dryers with a maximum heat input rate of 183 MMBtu/hour.
- B. Emissions from the Tissue Machine and associated dryers shall not exceed the following [06-096 CMR 115, BACT]:

<u>PM, lb/hr</u>	<u>PM<sub>10</sub>, lb/hr</u>	<u>PM<sub>2.5</sub> lb/hr</u>	<u>SO<sub>2</sub>, lb/hr</u>	<u>NO<sub>x</sub>, lb/hr</u>	<u>CO, lb/hr</u>	<u>VOC, lb/hr</u>
6.4	6.4	6.4	0.23	16.44	18.04	11

- C. Visible emissions from the Tissue Machine and associated fuel burning equipment shall not exceed 10% opacity on a six-minute block average basis, except for no more than one six-minute block average in a continuous three-hour period. [06-096 CMR 101]

(2) **Tissue Machine and No. 9 Power Boiler Combined Emissions Cap Compliance**

Woodland Pulp shall maintain records on a monthly basis demonstrating that the 12-month rolling total of combined emissions from the Tissue Machine and the No. 9 Power Boiler do not exceed the following licensed caps:

Combined Emissions from the Tissue Machine and No. 9 Power Boiler

<u>Pollutant</u>	<u>Limit, tons/year</u>
PM	213.6
NO <sub>x</sub>	624.8
VOC	59.5
CO <sub>2</sub> e	325,369.1

These combined emissions limits from the Tissue Machine and No. 9 Power Boiler shall become effective upon start-up of the Tissue Machine.

Compliance shall be documented through recordkeeping and calculations utilizing the following, as appropriate: production data, fuel use data, and factors from NCASI, AP-42, and stack test results, as approved by the Department.

Before start-up of the Tissue Machine, Woodland Pulp shall submit to the Department the specific methodology to be employed by the facility to assess, calculate, and document compliance with the above established caps. The Department will respond in writing within 30 days of submittal to confirm approval of or negotiate changes to the proposed methodology. Before making changes to this methodology, the facility shall obtain in writing the Department's approval of any changes in or adjustments to the established compliance assessment, calculation, and/or documentation procedures.

- (3) Woodland Pulp shall submit an application to incorporate this NSR license 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 7<sup>th</sup> DAY OF August, 2012.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Patricia W. Aho*  
PATRICIA W. AHO, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: June 14, 2012

Date of application acceptance: June 14, 2012

Date filed with the Board of Environmental Protection:

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



