



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**Huhtamaki, Inc.
Kennebec County
Waterville, Maine
A-416-70-F-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #3**

After review of the Part 70 License revision 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. §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Huhtamaki, Inc. – Waterville (Huhtamaki)
INITIAL LICENSE NUMBER	A-416-70-A-I
LICENSE TYPE	Administrative Revision to the Part 70 License
NAICS CODES	322222, 322299
NATURE OF BUSINESS	Molded Paper Products Manufacturing
FACILITY LOCATION	Waterville, Maine

B. Application Classification

Huhtamaki has requested an Administrative Revision to their Part 70/Title V license in order to modify their nitrogen oxides (NO_x) stack testing schedule. Conditions (16)F and (25)D of the original license required NO_x testing be performed on Boiler #5 by May 31 of each calendar year. These two sub-conditions were amended in 2004 (license amendment A-416-70-B-A) to authorize delay of the required Boiler #5 NO_x testing for calendar year 2004 only, from May 31 until December 31 of that year.

C. Administrative Revision Description

On March 26, 2012, the Department issued license A-416-77-1-A permitting the modification of Boiler #5 to have the capability to fire either natural gas or No. 6 fuel oil. Huhtamaki anticipates completing the project and firing natural gas in Boiler #5 prior to May 31, 2012. Upon converting to natural gas, Huhtamaki anticipates firing No. 6 fuel oil as a back-up fuel only, such as when natural gas is not available. Because the operating configuration is about to change, Huhtamaki requests that NO_x testing requirements on Boiler #5 be modified to reflect the environmental benefits of firing natural gas and licensed requirements of similar sources firing natural gas.

The pollutant emission rates resulting from firing natural gas are notably less than those resulting from firing No. 6 fuel oil. NO_x testing is typically not required for

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similar units that fire natural gas. In consideration of this information, the Department finds it appropriate to remove the annual NO_x testing requirement for Huhtamaki's Boiler #5 and replace it with a requirement of testing triggered by frequency and duration of No. 6 fuel oil use in Boiler #5.

ORDER

The following replaces Condition (16) F of License Amendment A-416-70-B-A:

(16) Boiler No. 5

F. Huhtamaki shall perform NO_x emission stack testing on Boiler #5 within 12 months of firing No. 6 fuel oil in Boiler #5 for greater than 50% of the boiler's annual total heat input, on a 12-month rolling total basis, beginning June 1, 2012. Records shall be kept for Boiler #5 documenting the heat input from each fuel, the total heat input, and the percentage of the total heat input from No. 6 fuel oil for the previous 12-month period. These records shall be kept on a monthly and a 12-month rolling total basis.

The following addresses Condition (25) D of License A-416-70-B-A:

(25) Stack Testing

Parts A, B, and C of this Special Condition from Air Emission License A-416-70-A-I are still in effect. Part D is hereby removed from the license for this facility.

DONE AND DATED IN AUGUSTA, MAINE THIS 14th DAY OF May, 2012.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie R. Gifford
PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-416-70-A-I.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: April 27, 2012

Date of application acceptance: April 30, 2012

Date filed with the Board of Environmental Protection:

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

