

Irving Forest Products, Inc./Pinkham Mill)
Aroostook County)
Ashland, Maine)
A-314-70-B-A)

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

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	Irving Forest Products, Inc/Pinkham Mill (Pinkham)
License Number	A-314-70-A-I
Current Amendment Type	502(b)(10) Change
NAIC Code(s)	2421
Nature of Business	Wood Products
Date of License Issuance	December 6, 2000
Date of License Expiration	December 6, 2005
Date of Amendment Issuance	April 14, 2004

This Part 70 Section 502(b)(10) license change includes the following:

- * increasing waste oil firing to 10,000 gallons/year and the inclusion of absorbent pad material used to clean up minor spills of waste oil and distillate fuels, and
- * changing the allowable firing of sawdust in the #1 Dillon Boiler to 40 tons/day (from 35 tons/day).

The short term emission limits and the total facility-wide fuel emission limits shall not increase with these changes.

B. Emission Equipment

This amendment addresses the fuel fired in Boiler #3 (68 MMBtu/hr biomass, 44.5 MMBtu/hr oil) and the fuel fired in Boiler #1 (10 MMBtu/hr sawdust).

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C. Application Classification

Per Chapter 100 of the Department's regulations, Part 70 Section 502 (b)(10) Changes are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring, recordkeeping, reporting, or compliance certification requirements. Part 70 502(b)(10) Changes cannot be defined as "modifications" or cause emissions in excess of the standards in the permit.

The changes proposed by Pinkham are not considered modifications since:

- * the increase in waste fuel oil will be offset by a reduction in total oil allowed in the boiler and waste fuel oil is already an allowable fuel for boiler #3.
- * the change in the allowable firing rate for sawdust in the boiler is a clarification to take into account fluctuations in the moisture content of the fuel.

Facility short term and licensed allowed emissions will remain the same.

II. 502(b)(10) DESCRIPTIONS

A. Waste Oil

Pinkham's current license is limited to 2500 gallons/year of waste oil in PBW Boiler #3. Pinkham has requested to increase that amount to 10,000 gallons per year and to include absorbent pad material used to clean up minor spills of waste oil and distillate fuel onsite. Absorbent pad material from off-site maintenance and other activities related to the facility shall also be allowed, with documentation of where the pads originated. Pinkham has maintenance garages located in Portage and Oakfield and also employs foresters with equipment that may periodically require the use of the absorbent pads.

Pinkham's current maximum facility-wide fuel limit is 250,000 gallons/year. The increase in waste oil shall be offset by lowering the licensed allowed fuel oil to 242,500 gallons/year. The short term PBW Boiler #3 emission limits shall remain the same.

Pinkham shall continue to meet the license requirements of burning the waste oil:

- the annual limit shall be met over a 12 month rolling total,
- only onsite waste oil meeting the criteria 'specification' or 'off-specification' waste oil shall be burned, and

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- the sulfur content of the waste oil shall not exceed 0.7% by weight demonstrated by test results performed on a representative sample of onsite generated specification or off-specification waste oil.

B. Sawdust

PD Boiler #1 has a capacity of 10 MMBtu/hr firing sawdust. Using an assumed moisture content (4250 Btu/lb moisture content, approx. 50 % moisture) and weighing a full bucket of sawdust and recording the number of buckets used, a limit of 35 tons/day was established in the license. Pinkham has requested the number be increased to 40 tons/day.

Due to the variability of the fuel moisture content, the Department approves the limit of 40 tons/day sawdust in the PD Boiler #1. There will be no increase in the 70,100 ton/year limit of biomass or the short term limits for Boiler #1.

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, or increment standards either alone or in conjunction with emissions from other sources.

Therefore the Department grants this amendment A-314-70-B-A, subject to the conditions found in air emission license A-314-70-A-I in addition to the following conditions:

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The following shall replace condition 23(G) in air emission license A-314-70-A-I:

(23) PBW, Boiler #3

G. Waste Oil

- i. Pinkham may burn no more than 10,000 gallons total of onsite generated specification and off-specification waste oil in Boiler #3, based on a 12 month rolling total. Pinkham shall maintain a log of waste oil fired on a monthly and 12 month rolling total. Only waste oil meeting the criteria “specification” or “off-specification” waste oil (as defined in the Department’s ‘Waste Oil Management Rules’) shall be burned in Boiler #3. The sulfur content of the waste oil shall not exceed 0.7% by weight demonstrated by test results performed on a representative sample of onsite generated waste oil. If the equipment generating the waste oil changes, a new representative sample must be tested. All waste oil test results shall be kept at the facility.
- ii. Pinkham may burn absorbent pad material used to clean up minor onsite spills of waste oil and distillate fuels in Boiler #3. Absorbent pad material from off-site maintenance and other activities related to the facility shall also be allowed, with documentation of how much material is burned and a record of where the pads originated. The burning of these waste oil product pads shall be considered part of the waste oil limit (for recordkeeping purposes, one drum of absorbent pads shall be considered to be 55 gallons of waste oil product).

[Chapter 140, BPT] **Enforceable by State Only**

The following shall replace condition 24(A) in air emission license A-314-70-A-I:

(24) PD, Boiler #1

- A. PD, Boiler #1 shall not exceed a heat input rate of 10 MMBtu/hr, firing sawdust. To document compliance with the boiler’s capacity, the weight of the sawdust fired shall be determined by weighing a full bucket of sawdust and recording the number of buckets used (max. 40 tons/day). Pinkham shall perform a weight verification of the sawdust bucket load at least once per month. [Chapter 140, BPT] **Enforceable by State Only**

The following shall replace condition 29(A) in air emission license A-314-70-A-I:

(29) Facility Fuel Use

- A. Pinkham shall not exceed a facility wide fuel cap of 242,500 gallons/year of #2 fuel oil with a sulfur content not to exceed 0.5% by weight, based on

