

Gardiner Paperboard Corporation)
Kennebec County)
Gardiner, Maine)
A-477-70-A-I)

Department
Findings of Fact and Order
Part 70 Air Emission License

After review of the Initial Part 70 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	Gardiner Paperboard Corporation
LICENSE NUMBER	A-477-70-A-I
LICENSE TYPE	Initial Part 70 License
SIC CODES	2631 (paperboard)
NATURE OF BUSINESS	Producer of pressed paperboard from hydropulped wastepaper
FACILITY LOCATION	721 Water Street, Gardiner
DATE OF LICENSE ISSUANCE	
LICENSE EXPIRATION DATE	

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Boiler 1	44.9 MMBtu/hr	#6 fuel oil boiler
Paper Making Process	5.65 tons/hr raw mat'l 5.2 tons/hr finished mat'l	custom machinery: pulpers, refiners, screens, forming sections, press sections, drying cylinders

Gardiner Paperboard Corp. has additional insignificant activities which do not need to be listed in the above emission equipment table but may be found in the application received on August 11, 1997.

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C. Application Classification

The application for Gardiner Paperboard Corp. does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

II. EMISSION UNIT DESCRIPTION

A. Process Description

Gardiner Paperboard Corp. produces recycle paper material from old corrugated cartons, old newspapers, and other waste papers. A significant source of emissions is the boiler that provides steam for the paper making operation and general heating.

The paper making operation is made up of a series of pulpers, refiners, screens, forming sections, press sections, and drying cylinders. The raw material (old corrugated cartons, newspapers, and other recycled wastepaper) is re-wetted and broken down into a slurry in a pulper. The slurry is then pumped through refiners and screens to break down the fiber agglomerate into individual fibers and remove contaminants such as plastic, gravel, wood, and metals.

The fiber slurry is then pumped to the forming cylinder section of the machine where it is formed into a continuous sheet of paperboard. A drainage and retention aid polymer and some dye are added to the slurry during the forming process. Some water removal occurs at this stage. After forming in the cylinder section, the sheet travels through six wringer-type presses. The water removed during forming and pressing is recycled back to the pulper.

The sheet of paper then travels through a series of steam heated drying cylinders where water is removed by evaporation. The moisture laden air from this section is exhausted through heat exchangers to the atmosphere. After drying, the paper is wound into rolls for shipment.

Gardiner Paperboard Corp. also produces a laminating paste. It is a mixture of water, clay and polyvinyl alcohol (PVA) which is used to laminate the board to form cores that are used to roll the paper. 100% of the paste produced at the facility is shipped off-site.

B. Boiler # 1, oil boiler

Unit Description

Boiler #1 was manufactured by Cleaver Brooks in 1979 and fires #6 fuel oil. The original burner was destroyed and replaced in 1995 with a burner having a maximum design heat input capacity of 44.9 MMBtu/hr. The fuel oil is limited to a maximum sulfur content of 0.7% and 2,500,000 gallons/year. The boiler was installed in 1983, prior to the New Source Performance Standards (NSPS) Subpart Dc applicability date. Emissions exit through a 100 ft stack.

Most of the steam from the boiler is sent through a reducing turbine which then supplies the motive force driving the paper machine. Almost all of the remaining steam is sent to the drying cylinders for drying the paper. A small percentage of the steam is used for building heat and heating water. Much of the condensate from the drying cylinders is recaptured and returned to the boiler to be turned into steam again.

The controls on boiler #1 include an automatic temperature control to preheat the fuel and a fire eye used as a flame sensor and pressure control. The burner is a low NO_x burner unit.

Emissions were based on previous licensed limits. These limits were calculated using AP-42 factors and data on low NO_x burners.

Streamlining

Opacity

Gardiner Paperboard Corp. accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(1) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The BPT opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license.

Fuel Use

Gardiner Paperboard Corp. accepts streamlining for NO_x RACT requirements. The NO_x RACT facility threshold is 99.9 tons/year, however, the fuel limit of 2,500,000 gallons of oil is more restrictive, capping NO_x at 56.3 tons/year.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes records of fuel use through purchase receipts indicating amounts (gallons) and percent sulfur by weight. The fuel records shall be kept on a monthly and a 12 month rolling basis.

Gardiner Paperboard Corp. shall also maintain a log documenting boiler maintenance as part of periodic monitoring.

C. Paper Making Process

Unit Description

The papermaking process includes the pulpers, refiners, screens, forming sections, press sections and drying cylinders. The original equipment was installed in 1949 and has been modified several times since then. Parts of the dryer and press sections were manufactured in the early 1920's and remain as they were at installation. The main press section was manufactured in 1988. The forming vats were manufactured in 1987 and the dryers were manufactured in 1996 and 1997.

A small amount of VOCs are emitted from the various retention aides, dyes, dispersing agents, and laminating paste used in the paper making process. VOC emissions from the paper making process were not addressed in the previous license. Based on information submitted with the initial Part 70 air emission license application, Gardiner Paperboard Corp. shall be limited to 18 tons/year VOC emissions from the papermaking process, based on a 12 month rolling total.

Periodic Monitoring

Periodic monitoring for VOC emissions from the papermaking process shall consist of recordkeeping which shall include the amount of chemical used, % of VOC per unit, and total VOC. The total facility VOC records shall be kept on a monthly and a 12 month rolling total basis.

D. Solvent Degreasers

Gardiner Paperboard currently operates two Safety Kleen cold cleaners. These cold cleaners are applicable to Chapter 130 of the Department's regulations (Solvent Degreasers).

Periodic Monitoring

Periodic monitoring for the degreaser units shall consist of recordkeeping including records of solvent added and removed.

E. Facility Emissions

Facility emissions were calculated based on an annual fuel limit of 2,500,000 gallons of #6 oil with a 0.7% sulfur content and an 18 tons/year VOC limit from the process. Emissions from Gardiner Paperboard shall not exceed the following:

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Total Allowable Annual Emissions for the Facility
(used to calculate the license fee)

Pollutant	Tons/Year
PM	37.5
PM ₁₀	37.5
SO ₂	136.9
NO _x	56.3
CO	5.62
VOC	19.6

III. AIR QUALITY ANALYSIS

Gardiner Paperboard 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 Initial Part 70 License.

ORDER

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

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

The Department hereby grants the Part 70 License A-477-70-A-I, subject to the following conditions:

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the license's premises during business hours, or any time during which any emission units are in operations, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license;

- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; **Enforceable by State-only**
- (5) The licensee shall pay the annual air emissions license fee to the Department, calculated pursuant to Title 38 MRSA §353;
- (6) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;
- (7) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; **Enforceable by State-only**
- (8) The licensee shall maintain sufficient records, to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;
- (9) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.
- (10) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.

- (11) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;
- (12) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- (a) perform stack testing under circumstances representative of the facility's normal process and operating conditions:
 - (i) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
 - (ii) to demonstrate compliance with the applicable emission standards; or
 - (iii) pursuant to any other requirement of this license to perform stack testing.
 - (b) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emissions testing; and
 - (c) submit a written report to the Department within thirty (30) days from the date of test completion.

Enforceable by State-only

- (13) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:
- (a) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
 - (b) the days of violation shall be presumed to include the date and stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operation conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - (c) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

- (14) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.
- (15) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
- (a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - (b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.
- Nothing in this section of any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to section 114 of the CAA.
- (16) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license.
- (17) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next working day, whichever is later, of such occasions and shall report that probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;
- (18) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall

prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

- (19) The licensee shall submit quarterly reports of any required monitoring as required by the Department. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.
- (20) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently as specified in the Applicable requirement by the Department. The compliance certification shall include the following:
 - (a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (e) Such other facts as the Department may require to determine the compliance status of the source;
- (21) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
 - (a) Additional Applicable requirements under the CAA become applicable to the Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;
 - (b) Additional requirements (including excess emissions requirements) become applicable to the Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
 - (c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms of conditions of the Part 70 license; or
 - (d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

(22) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading or other similar programs or processes for changes that are provided for in the Part 70 license.

SPECIAL CONDITIONS

(23) **Permit Shield for Non-Applicable Requirements**

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated August 11, 1997.

	<u>SOURCE</u>	<u>CITATION</u>	<u>DESCRIPTION</u>	<u>BASIS FOR DETERMINATION</u>
A.	Boiler #1	40 CFR Part 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Commenced construction prior to June 9, 1989
B.	Facility	Chapter 138	NO _x RACT	Facility is limited to less than 99.9 tons NO _x /year
C.	Facility	Chapter 134	VOC RACT	Facility is limited to less than 40 tons VOC/year

(24) **Boiler 1**

A. The boiler (44.9 MMBtu/hr) shall fire #6 fuel oil. The sulfur content of the fuel oil fired shall not exceed 0.7% by weight demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT]

B. Emissions from the boiler shall not exceed the following limits:

<i>Pollutant</i>	<i>Limit</i>	<i>Origin and Authority</i>	<i>Enforceability</i>
PM	0.2 lb/MMBtu	MEDEP, Chapter 103, Section 2(A)(1)	-
	9.0 lb/hr	MEDEP Chapter 140, BPT	Enforceable by State-only
PM ₁₀	9.0 lb/hr	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	32.8 lb/hr	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	13.5 lb/hr	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	1.3 lb/hr	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	0.4 lb/hr	MEDEP Chapter 140, BPT	Enforceable by State-only

C. Gardiner Paperboard shall operate the boiler such that the visible emissions from the stack does not exceed 30% opacity on a six (6) minute block average basis, for more than two (2) six (6) minute block averages in a 3-hour period. [MEDEP Chapter 140, BPT]

- D. Gardiner Paperboard shall maintain records of annual #6 fuel use indicating the quantity of fuel consumed (gallons), the percent (%) sulfur content of the fuel by weight, and the heat content of the fuel, demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT]
- E. Gardiner Paperboard shall maintain a boiler maintenance log. The log shall include all planned and unplanned maintenance work on the boiler.
- F. Gardiner Paperboard shall not exceed an annual #6 fuel cap of 2,500,000 gallons per year (12 month rolling total) demonstrated by fuel use records. [MEDEP Chapter 140, BPT]

(25) **Paper Making Process**

- A. Gardiner Paperboard shall maintain records of VOC emissions from the papermaking process. The records shall include the amount of chemical used, % of VOC per unit, and total VOC. The total facility VOC records shall be kept on a monthly and a 12 month rolling total basis. The VOC monthly recordkeeping for this license shall begin on the signature date. The rolling total shall begin twelve months after the month in which the license was signed. [MEDEP Chapter 140, BPT]
- B. Gardiner Paperboard shall not exceed an annual VOC limit from the papermaking process of 18 tons VOC/year based on a 12 month rolling total [MEDEP Chapter 140, BPT]

(26) **Solvent Degreasers**

For the cold cleaning degreasers, Gardiner Paperboard shall:

- A. Equip the washer with a cover if vapor pressure >15 mmHG at 100°F, the solvent is agitated, or if the solvent is heated,
 - B. Label the cold cleaning parts washer with the operational standards (see C-G as follows),
 - C. Close the cover when not in use,
 - D. Drain parts for at least 15 seconds or until the dripping ceases,
 - E. Not degrease porous or absorbent material,
 - F. Keep drafts across the top of each cold cleaning degreaser to less than 131.2 ft/minute when the cover is open,
 - G. Not operate the cold cleaning degreaser upon the occurrence of any visible solvent leak until such leak is repaired, and
 - H. Shall keep records of solvent added and removed.
- [MEDEP Chapter 130]

(27) Semiannual Reporting

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The initial semiannual report is due April 30, 2000; 30 days from the end of the second calendar quarter following the date of signature of this license.

A. Each semiannual report shall include a summary of the periodic monitoring required by this license.

B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

[MEDEP Chapter 140]

(28) Annual Compliance Certification

The licensee shall submit an annual compliance certification to the Department in accordance with Condition (20) of this license. The initial annual compliance certification is due October 31, 2000 with the submittal of the second semiannual report after the signature date of this license. [MEDEP Chapter 140]

(29) Annual Emission Statement

The licensee shall annually report to the Department, in a specified format, fuel use, operating rates, use of materials and other information necessary to accurately update the State's emission inventory. [MEDEP Chapter 137]

(30) General Regulations

The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>
Chapter 102	Open Burning
Chapter 109	Emergency Episode Regulation
Chapter 110	Ambient Air Quality Standard
Chapter 116	Prohibited Dispersion Techniques

