

STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION 17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

DEPARTMENT ORDER

International Paper Company Androscoggin County Auburn, Maine A-461-71-N-R (SM) Departmental
Findings of Fact and Order
Air Emission License
Renewal

FINDINGS OF FACT

After review of the air emission license renewal application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

International Paper Company (IP) has applied to renew their Air Emission License for the operation of emission sources associated with their corrugated container manufacturing facility.

The equipment addressed in this license is located at 175 Allied Road, Auburn, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (scf/hr)	Fuel Type, % sulfur	Date of Manuf.	Date of Install.	Stack#
Boiler #1	10.7	10,460	Natural Gas*, negligible	1974	1974	1
Boiler #3	20.9	20,490	Natural Gas*, negligible	2003	2003	2

^{*} Boilers #1 and #3 were previously licensed to fire #4 and #6 fuel oil. The fuel oil storage tank and feed equipment have been physically removed, and the boilers now fire natural gas exclusively.

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Process Equipment

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Equipment	Production Rate	Pollution Control Equipment
Waste Trim	500,000 ft²/hr*	Cyclone
General Building Ventilation (VOC from printing, gluing, etc.)	500,000 ft²/hr*	None
Starch Silo	7,000 lb/day	Baghouse
Presses (7)	500,000 ft ² /hr	None
Parts Washers (2)	N/A	None

^{*} Facility maximum total production.

IP also operates a small (40 kW) LPG-fired emergency generator. This equipment has a heat input less than 0.5 MMBtu/hr and is therefore considered an insignificant activity. It is mentioned here for completeness only.

C. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the issued date of this license.

The application for IP does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of currently licensed emission units only and has been processed through *Major* and *Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115.

With the VOC and HAP limits associated with the printing inks and the folding/gluing operations, the facility is licensed as follows:

- · As a synthetic minor source of air emissions, because the licensed emissions are below the major source thresholds for criteria pollutants; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

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 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment.

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BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

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- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Process Description

IP manufactures corrugated containers from liner board stock. Rolled unbleached liner board paper stock is threaded onto the corrugator where it is shaped into corrugated folds and then glue (a combination of starch, water, borax, caustic soda, and starch additive combined on-site) is applied to both sides of the corrugated paper. Emissions from the use of starch additives in the glue are released to the atmosphere via general building ventilation.

After glue is applied to the corrugated paper sheet, top and bottom layers of flat liner board paper is attached. As the sheet leaves the corrugator, it is trimmed to width and cut to length for further processing on the converters.

Steam is provided to various areas of the plant by two boilers. Boiler #1 is used for seasonal heating needs. Boiler #3 is used primarily as a high pressure boiler to provide process steam for the corrugation systems. Both boilers now fire only natural gas.

Corrugated box board stock is processed through the converters where the stock is cut and finished to meet customer specifications. The stock is die-cut to the correct dimension and shape to form the tabs that will assemble the box. The cut stock is then printed to customer specifications on the presses, and an adhesive is applied to facilitate assembly during the converting process. The converting process is completely enclosed, and no vents are associated with it. However, non-point source VOC and HAP emissions occur as a result of the inks, ink additives, adhesives, and coatings used in finishing the flat container, and these emissions are released to the atmosphere via general building ventilation (doors, windows, roof vents, etc.). From the converters, the flat containers are packaged and shipped to the customer.

Trim from the converters and corrugator, floor waste, and damaged or off-spec boxes are transported via pneumatic system to a shredder and baler. Particulate matter (PM) generated from this process is controlled by a cyclone.

IP uses VOC-containing chemicals to clean rollers and in its parts washers. These activities result in the release of small amounts of VOC to the atmosphere via general building ventilation. IP also operates a starch silo. PM emissions from the silo are controlled with a baghouse.

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C. Boilers #1 and #3

Boiler #1 is rated at 10.7 MMBtu/hr and is used for seasonal heating needs. It was manufactured and installed in 1974.

Boiler #3 is rated at 20.9 MMBtu/hr and is used primarily as a high pressure boiler to provide process steam for the corrugation systems. It was manufactured and installed in 2003.

Both boilers fire natural gas and exhaust through their own dedicated stack.

1. BPT Findings

The BPT emission limits for the boilers were based on the following:

PM/PM_{10}		0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT
SO_2	*****	0.6 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
NO_x	_	100 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
CO	_	84 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
VOC		5.5 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
Visible	_	06-096 C.M.R. ch. 115, BPT
Emissions		

The BPT emission limits for the boilers are the following:

Unit	Pollutant	lb/MMBtu
Boiler #1	PM	0.05
Boiler #3	PM	0.05

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.53	0.53	0.01	1.05	0.88	0.06
Boiler #3	1.05	1.05	0.01	2.05	1.72	0.11

Visible emissions from Boilers #1 and #3 shall each not exceed 10% opacity on a six-minute block average basis.

2. New Source Performance Standards (NSPS): 40 C.F.R. Part 60, Subpart Dc

Due to its year of manufacture, Boiler #1 is not subject to Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr manufactured after June 9, 1989. [40 C.F.R. § 60.40c]

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Boiler #3 is subject to 40 C.F.R. Part 60, Subpart Dc. IP shall comply with the following requirements of 40 C.F.R. Part 60, Subpart Dc applicable to Boiler #3:

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IP shall record and maintain records of the amount of natural gas combusted by the facility during each calendar month. [40 C.F.R. § 60.48c(g)(3)]

3. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJJ

Boilers which fire only natural gas (i.e. Boilers #1 and #3) are exempt from *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ.

D. Process Emissions

Following are descriptions of emissions associated with the corrugator, presses, and other general process emissions at the facility.

1. Waste Trim

As the corrugated material is trimmed to product specifications, the reject and scrap pieces are collected pneumatically. The rejected corrugated pieces are separated from the air system by a cyclonic separator, which is vented through stack #3.

BPT for the Waste Trim collection system is the use of a cyclone and a visible emissions limit of 20% opacity on a six-minute block average basis.

2. Cornstarch Glue

The glue that is used in the corrugating formation process is a water based cornstarch mixture. Emissions are considered to be insignificant and are therefore noted for completeness only.

3. Printing Inks

IP uses a variety of inks to print the outsides of the containers. Assuming a maximum total quantity of 30,000 gallons of ink with an average VOC content of 0.74 lb VOC/gal by weight is used per year, and that the inks volatize completely, IP shall not exceed 11.1 tons/year of VOC emitted from the Printing process on a 12-month rolling total basis.

Some of the printing inks contain HAPs in varying quantities. IP shall not exceed 9.9 tons/year of total HAPs on a 12-month rolling total basis from the Printing process. The HAP limits are based on representative ink use and HAP content data.

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Compliance with the VOC and HAP emission limits shall be documented on a mass balance basis.

4. Folding/Gluing

The glue that is applied in the fold and gluing process of the corrugated boxes contains 0.009 lb VOC/gallon of glue. The use of 20,000 gallons of glue on an annual basis, will result in emissions of less than 0.1 tpy of VOC from the Folding/Gluing process. Therefore, IP shall be limited to the use of 20,000 gallons/year of glue and a 12-month rolling total basis.

5. Starch Silo

Emissions from the starch silo vent through a baghouse. Visible emissions from the baghouse shall not exceed 10% opacity on a six-minute block average basis. IP shall take corrective action if visible emissions from the bag house exceed 5% opacity on a six-minute block average basis.

6. General Process Emissions

Visible emissions from any general process source (including building ventilation) shall not exceed 20% opacity on a six-minute block average basis.

E. Parts Washer

IP operates two parts washers (degreasers) each with a 25 gallon capacity. The degreasing liquid is 100% VOC as purchased and approximately 20% VOC as applied. Therefore, the parts washers are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130 and records shall be kept documenting compliance.

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F. Annual Emissions

1. Total Annual Emissions

IP shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits were calculated based on unlimited use of natural gas in the boilers and VOC and HAP limits for the process equipment.

Total Licensed Annual Emissions for the Facility Tons/year

(used to calculate the annual license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	Total HAP
Boiler #1	2.3	2.3		4.6	3.9	0.3	_
Boiler #3	4.6	4.6	0.1	9.0	7.5	0.5	_
Printing	_	_	_	_	_	11.1	9.9
Folding/Gluing				_		0.1	-
Total TPY	6.9	6.9	0.1	13.6	11.4	12.0	9.9

2. Greenhouse Gases

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 C.F.R. Part 52, Subpart A, § 52.21, Prevention of Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in 06-096 C.M.R. ch. 100, are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

The quantity of CO_2 e emissions from this facility is less than 100,000 tons per year, based on the following:

- the facility's fuel use;
- worst case emission factors from the following sources: U.S. EPA's AP-42, the Intergovernmental Panel on Climate Change (IPCC), and *Mandatory Greenhouse Gas Reporting*, 40 C.F.R. Part 98; and
- global warming potentials contained in 40 C.F.R. Part 98.

No additional licensing actions to address GHG emissions are required at this time.

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III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by case basis. In accordance with 06-096 C.M.R. ch. 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

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Pollutant	Tons/Year
PM_{10}	25
SO_2	50
NO _x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

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-461-71-N-R subject to the following conditions.

<u>Severability</u>. The invalidity or unenforceability of any provision of this License or part thereof 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.

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the

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purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S. § 347-C).

- (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 115. [06-096 C.M.R. ch. 115]
- (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. [06-096 C.M.R. ch. 115]
- (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. [06-096 C.M.R. ch. 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S. § 353-A. [06-096 C.M.R. ch. 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 C.M.R. ch. 115]
- (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. [06-096 C.M.R. ch. 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. 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 a renewal of a license or amendment shall not stay any condition of the license. [06-096 C.M.R. ch. 115]
- (10) 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.

 [06-096 C.M.R. ch. 115]

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- (11) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:
 - A. Perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 - 1. 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; or
 - 2. 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 C.F.R. Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - C. Submit a written report to the Department within thirty (30) days from date of test completion.

[06-096 C.M.R. ch. 115]

- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate 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 C.F.R. Part 60 or other method approved or required by the Department; and
 - B. The days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating 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.

[06-096 C.M.R. ch. 115]

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(13) Notwithstanding any other provisions 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. [06-096 C.M.R. ch. 115]

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- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and 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 state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 C.M.R. ch. 115]
- (15) Upon written request from 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 a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

 [06-096 C.M.R. ch. 115]

SPECIFIC CONDITIONS

(16) **Boilers #1 and #3**

- A. Boilers #1 and #3 are licensed to fire natural gas. [06-096 C.M.R. ch. 115, BPT]
- B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.05	06-096 C.M.R. ch. 115, BPT
Boiler #3	PM	0.05	06-096 C.M.R. ch. 115, BPT

C. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT/BACT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.53	0.53	0.01	1.05	0.88	0.06
Boiler #3	1.05	1.05	0.01	2.05	1.72	0.11

D. Visible emissions from Boilers #1 and #3 shall each not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

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E. 40 C.F.R. Part 60, Subpart Dc

- 1. IP shall comply with all applicable requirements for Boiler #3 of 40 C.F.R. Part 60, Subpart Dc.
- 2. IP shall record and maintain records of the amount of natural gas combusted by the facility during each calendar month. [40 C.F.R. § 60.48c(g)(3)]

(17) Process Emission Sources

A. Waste Trim

- 1. The Waste Trim operation shall vent to a cyclone. [06-096 C.M.R. ch. 115, BPT]
- 2. Visible emissions from the Waste Trim operation shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

B. Printing Inks

- 1. IP shall not exceed 11.1 tons/year of VOC emitted from the Printing operation, on a 12-month rolling total basis. [06-096 C.M.R. ch. 115, BPT]
- 2. IP shall not exceed 9.9 tons/year total HAPs from the Printing operation, on a 12-month rolling total basis. [06-096 C.M.R. ch. 115, BPT]
- 3. Compliance with the VOC and HAP emission limits for printing inks shall be demonstrated by records of the amount of each ink used, the VOC and HAP contents for each ink, and total VOC and HAPs emitted on a 12-month rolling total basis. [06-096 C.M.R. ch. 115, BPT]

C. Folding/Gluing

IP shall not exceed the use of 20,000 gallons of glue on a 12-month rolling total basis. Compliance shall be demonstrated by records of the amount of glue used on a monthly and 12-month rolling total basis. [06-096 C.M.R. ch. 115, BPT]

D. Starch Silo

- 1. The Starch Silo shall vent to a baghouse. [06-096 C.M.R. ch. 115, BPT]
- 2. Visible emissions from the baghouse shall not exceed 10% opacity on a six-minute block average basis. IP shall take corrective action if visible emissions from the bag house exceed 5% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

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3. IP shall keep maintenance records for the baghouse recording the date and location of all bag failures as well as routine and non-routine maintenance. [06-096 C.M.R. ch. 115, BPT]

E. General Process Emissions

Visible emissions from any general process source (including building ventilation) shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(18) Parts Washers

Parts washers at IP are subject to Solvent Cleaners, 06-096 C.M.R. ch. 130.

- A. IP shall keep records of the amount of solvent added to each parts washer. [06-096 C.M.R. ch. 115, BPT]
- B. The following are exempt from the requirements of 06-096 C.M.R. ch. 130 [06-096 C.M.R. ch. 130]:
 - 1. Solvent cleaners using less than two liters (68 oz.) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
 - 2. Wipe cleaning; and,
 - 3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
- C. The following standards apply to cold cleaning machines that are applicable sources under 06-096 C.M.R. ch. 130.
 - 1. IP shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 C.M.R. ch. 130]:
 - a. Waste solvent shall be collected and stored in closed containers.
 - b. Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
 - c. Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
 - d. The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
 - e. Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the parts washer.
 - f. When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.

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- g. Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
- h. Work area fans shall not blow across the opening of the parts washer unit.
- i. The solvent level shall not exceed the fill line.
- 2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 C.M.R. ch. 130]
- (19)IP shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S. § 605).

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DONE AND DATED IN AUGUSTA, MAINE THIS

23 DAY OF June

DEPARTMENT OF ENVIRONMENTAL PROTECTION

The term of this license shall be ten (10) years from the signature date above.

[Note: If a renewal application, determined as complete by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 M.R.S. § 10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the license renewal application.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 3/20/17 Date of application acceptance:

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

State of Maine Board of Environmental Protection