



DEPARTMENT ORDER

**Woodland Pulp LLC
Washington County
Baileyville, Maine
A-215-77-21-M**

**Departmental
Findings of Fact and Order
New Source Review
NSR #21**

FINDINGS OF FACT

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 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Woodland Pulp LLC
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Revision
NAICS CODES	322120
NATURE OF BUSINESS	Pulp and Paper Mill
FACILITY LOCATION	144 Main Street, Baileyville, Maine

B. NSR License Description

Woodland Pulp LLC (Woodland Pulp) was issued New Source Review (NSR) license A-215-77-20-A on May 25, 2023, authorizing the construction and operation of a new Tissue Machine (TM3), and to re-license two previously licensed tissue machines (TM1 and TM2) to uncouple the units from PM and VOC emission caps with the #9 Power Boiler established in NSR A-215-77-6-A (3/8/13). Woodland Pulp has requested an NSR license amendment to extend its 18-month deadline to commence construction for TM3 and to extend the timeframe for installation of a venturi scrubber on TM2.

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 submitted by Woodland Pulp does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements.

The proposed revision will not change the facility's expected emissions or emission limits. Therefore, the NSR license is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 Code of Maine Rules (C.M.R.) ch. 115. The procedures found in 06-096 C.M.R. ch. 115 can be utilized to process this application since the proposed revision is not prohibited by the Part 70 air emission license. An application to incorporate the requirements of this NSR license into the Part 70 air emission license has been submitted to the Department.

D. Construction Timeframe Extension

NSR License A-215-77-20-A, issued May 25, 2023, approved the construction and operation of a new tissue machine (TM3) at the Baileyville facility. Standard Statement (1) of Air Emission License A-215-70-I-R/A, issued November 18, 2011, establishes an original construction timeframe of 18 months after the approval to construct, as follows:

(1) 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. 140]

Woodland Pulp's original 18-month timeframe for commencing construction began on May 25, 2023, with the issuance of NSR license A-215-77-20-A. Woodland Pulp has requested permission to extend this timeframe by an additional 18 months in order to complete a sales and marketing analysis needed for the proposed project. The BACT analysis included in NSR license A-215-77-20-A remains the most applicable control technologies, operating practices, and emission limits for the facility. Woodland Pulp has demonstrated reasonable justification for a delay, and the Department has elected to extend the allowable construction period by an additional 18 months. As of the issuance of this NSR license, Woodland Pulp shall have until May 25, 2026, to commence construction on the project as addressed by NSR license A-215-77-20-A.

E. TM2 Venturi Scrubber

Specific Condition (1)B.2. of NSR license A-215-77-20-A requires Woodland Pulp to install a venturi-style wet scrubber on TM2 no later than 24 months after the date of issuance of the NSR. Woodland Pulp has requested that this deadline be modified to coincide with construction on the TM3 project. Scheduling the installation of the venturi-style wet scrubber on TM2 at the same time as construction and installation of TM3 will minimize both cost and production disruptions at the facility. The Department has elected to extend the deadline for installation of the wet scrubber. As of the issuance of this NSR

license, Woodland Pulp shall have until May 25, 2026, to commence construction on the TM2 venturi-style wet scrubber.

F. Annual Emissions

This license amendment will not change the facility's licensed annual emissions.

ORDER

The Department hereby grants New Source Review Minor Revision A-215-77-21-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the specific conditions below.

Severability. The invalidity or unenforceability of any provision of this License Amendment or part thereof shall not affect the remainder of the provision or any other provisions. This License Amendment 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 shall replace Condition (1)B.2. of NSR License A-215-77-20-A:

(1) Tissue Machines

B. Control Equipment

2. Installation of the venturi-style wet scrubber on TM2 shall begin no later than May 25, 2026. [06-096 C.M.R. ch. 115]

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The following is a new condition:

- (2) The Department grants an 18-month construction timeframe extension to Woodland Pulp to commence construction on TM3 addressed in NSR license A-215-77-20-A. If Woodland Pulp does not commence construction prior to May 25, 2026, approval to construct shall become invalid, and Woodland Pulp shall be required to apply for an NSR license amendment to re-address BACT for these changes. [06-096 C.M.R. ch. 115 § (3)(E)(5)(c)]

DONE AND DATED IN AUGUSTA, MAINE THIS 7th DAY OF JANUARY, 2025.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: November 4, 2024

Date of application acceptance: November 12, 2024

This Order prepared by Benjamin Goundie, Bureau of Air Quality.