



DEPARTMENT ORDER

Woodland Pulp LLC  
Washington County  
Baileyville, Maine  
A-215-70-T-A

Departmental  
Findings of Fact and Order  
Part 70 Air Emission License  
Amendment #8

FINDINGS OF FACT

After review of the Part 70 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 (Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Woodland Pulp LLC
LICENSE TYPE	Part 70 Minor License Modification
NAICS CODES	322120
NATURE OF BUSINESS	Pulp and Paper Mill
FACILITY LOCATION	144 Main Street, Baileyville, Maine

Woodland Pulp LLC (Woodland Pulp) has requested a Part 70 minor modification to incorporate New Source Review (NSR) minor revision A-215-77-21-M (issued 1/7/2025). The NSR minor revision extended the deadline to commence construction on the Tissue Machine 3 (TM3) project described in NSR A-215-77-20-A (issued 5/25/2023) and updated the deadline for the installation of a venturi-style wet scrubber on Tissue Machine 2 (TM2) to coincide with TM3 project construction.

B. Emission Equipment

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

Process Equipment

Equipment	Production Rate	Pollution Control Equipment	Stack #
TM2	187.4 ADT/day	Wet dust collection system and venturi scrubber	TM2_YH TM2_Dust

### 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.

A Part 70 Minor License Modification is for a license change that meets the following criteria:

- Does not violate any Applicable requirement;
- Does not involve a significant change to existing monitoring, reporting, or recordkeeping requirements in the license;
- Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impact or a visibility or increment analysis;
- Does not seek to establish or change a Part 70 license term or condition for which there is no corresponding underlying Applicable requirement, and that the source has assumed to avoid an Applicable requirement to which the source would otherwise be subject. Such terms and conditions include a federally enforceable emissions cap assumed to avoid classification as a Title I modification or a modification or reconstruction under any provision of Section 111, or 112 of the Clean Air Act (CAA); and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the CAA;
- Is not a Title I modification or a modification or reconstruction under any provision of Section 111 or 112 of the CAA; and
- Is not required by the Department to be processed under Part 70 Significant License Modification procedures.

Woodland Pulp has requested incorporation into the Part 70 Air License the relevant terms and conditions of New Source Review (NSR) license A-215-77-21-M (1/7/2025) issued to the facility pursuant to *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115. The facility's request to incorporate NSR requirements is classified as a Part 70 Minor License Modification and has been processed under *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 140.

### D. Minor Modification Description

Woodland Pulp was issued NSR License A-215-77-20-A on May 25, 2023. This NSR authorized the construction of a new tissue machine (TM3), and re-licensed two previously licensed tissue machines (TM1 and TM2) to uncouple the units from emission caps with the #9 Power Boiler established in NSR A-215-77-6-A (3/18/13). Standard Statement (1) of Air Emission License A-215-70-I-R/A, issued November 18, 2011, established 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. This timeframe was extended by an additional 18 months to May 25, 2026, in NSR License A-215-77-21-M, issued January 7, 2025. The BACT analysis included in NSR license A-215-77-20-A and summarized in license A-215-70-S-A (11/20/2024) remains the most applicable control technologies, operating practices, and emission limits for the facility.

Specific Condition (1)B.2. of NSR license A-215-77-20-A required Woodland Pulp to install a venturi-style wet scrubber on TM2 no later than 24 months after the date of issuance of the NSR. This condition was incorporated into Woodland Pulp's Part 70 license in license amendment A-215-70-S-A (11/20/2024). NSR license A-215-77-21-M updated the deadline to begin installation of the TM2 scrubber to coincide with the deadline for commencing construction on the TM3 project. Woodland Pulp shall commence construction on a venturi-style wet scrubber on TM2 by May 25, 2026.

#### **E. Facility Annual Emissions**

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

### **ORDER**

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

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

The Department hereby grants the Part 70 License Amendment A-215-70-T-A pursuant to 06-096 C.M.R. 140 and the preconstruction permitting requirements of *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 and subject to the conditions found in Air Emission License A-215-70-I-R/A; in amendments A-215-70-K-A, A-215-70-L-A, A-215-70-M-A, A-215-70-N-A, A-215-70-P-A, A-215-70-R-A, and A-215-70-S-A; and the following conditions.

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4

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Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 C.M.R. ch. 115 for making such changes and pursuant to the applicable requirements in 06-096 C.M.R. ch. 140.

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

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 (52)A.1. of Air Emission License A-215-70-S-A:**

**(52) Tissue Machines (TM1, TM2, and TM3)**

**A. 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 (A-215-77-21-M, 1/7/2025)]

DONE AND DATED IN AUGUSTA, MAINE THIS 19<sup>th</sup> DAY OF MARCH, 2025.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for  
MELANIE LOYZIM, COMMISSIONER

**The term of this amendment shall be concurrent with the term of Air Emission License A-215-70-I-R/A.**

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.