



DEPARTMENT ORDER

**Sappi North America, Inc.
Somerset Operations
Somerset County
Skowhegan, Maine
A-19-77-12-M**

**Departmental
Findings of Fact and Order
New Source Review
NSR #12**

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	Sappi North America, Inc.
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Revision
NAICS CODES	322121
NATURE OF BUSINESS	Pulp and Paper Mill
FACILITY LOCATION	1329 Waterville, Road, U.S. Route 201 Skowhegan, Maine

B. Amendment Description

Sappi North America, Inc. (Sappi) has requested a New Source Review (NSR) license to amend NSR License A-19-77-8-M (May 7, 2014) to clarify that Sappi is allowed to fire High Volume, Low Concentration (HVLC) gases in Power Boiler #2 (PB#2) without the operation of the electrostatic precipitator (ESP). It also clarifies the use of the distillate fuel igniters.

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 Sappi does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements, and it does not seek to modify a Best Available Control Technology (BACT) analysis.

The proposed revision will not change the facility's emission limits nor will it result in an emission increase of greater than 4 tons/year of a single pollutant or 8 tons/year total pollutants. Therefore, the amendment 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.

A request for a Part 70 administrative revision was submitted concurrently with this licensing action for incorporation into Sappi's Part 70 license.

D. Project Description

Air Emission License Minor Revision A-19-77-8-M issued a finding that PB#2 ESP may be shut off during periods when firing only natural gas. Sappi requests a clarification to also allow the ESP to be shut off during instances when natural gas is fired in conjunction with HVLC gases. HVLC gases are essentially ambient air with very low concentrations of pulp mill total reduced sulfur gases collected from a variety of process equipment throughout the facility. At present, HVLC gases are mixed with boiler combustion air when introduced into the boiler.

When the natural gas firing capability was installed, the natural gas was added by installing eight burners in the four corners of the boiler at two separate levels (using existing unused fuel ports adjacent to the No. 6 fuel oil ports). The existing upper four distillate ignitor ports were replaced with natural gas ignitors. However, the existing four lower distillate ignitors were not replaced and provide the facility with additional flexibility to start up the natural gas burners with the distillate oil ignitors. ESPs would not be in operation when distillate fuel oil is used for the sole purpose of igniting the natural gas burners. In addition, this gives Sappi the ability to start up the No. 6 oil burners with the distillate fuel oil ignitors when the natural gas is not available for igniting the No. 6 oil burners. When igniting the No. 6 oil burners, Sappi intends to operate the ESP.

Pursuant to EPA's 40 C.F.R. Part 63 Subpart DDDDD, *National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, ESPs are not required to be in operation during "startup" periods when "clean fuels" are being fired. Distillate fuel is defined by Subpart DDDDD as a clean fuel and is used in the lower four ignitors for the startup of the natural gas burners. The distillate fuel ignitors are only operated for short durations to ignite the gas burners. They are typically operated for less than 15 minutes when igniting natural gas burners and do not provide enough heat to carry the steam load needed for the boiler to be operational.

Pursuant to license condition (28) in A-19-70-A-I (12/4/04), combustion of HVLC gases in PB#2 needs to be maximized because Power Boiler #1 (PB#1) is restricted to combusting HVLC gases less than 1,314 hours in a calendar year. Unlike PB#2, PB#1 is not equipped with an SO₂ scrubber.

During these alternative ESP operating scenarios, Sappi shall not be not be relieved of its obligation to meet its licensed opacity and PM limits.

ORDER

The Department hereby grants New Source Review Minor Revision A-19-77-12-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the standard and 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 condition shall amend Specific Condition (1) in A-19-77-8-M.

(1) No. 2 Power Boiler

- E. Notwithstanding Condition 17(O) of License A-19-70-A-I, Sappi is not required to operate the ESP during the following:
1. periods of natural gas firing only,
 2. boiler trips triggered by Burner Management System (BMS) safety protocols resulting in the shutdown of the ESP,
 3. periods in which natural gas and HVLC gases (no solid or liquid fuels) are combusted in the boiler, or

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4. periods in which distillate fuel ignitors are used to ignite the natural gas burners. The distillate fuel ignitors may be used to ignite the No. 6 Fuel Oil burners, but the ESP shall be online when this occurs.

DONE AND DATED IN AUGUSTA, MAINE THIS 1st DAY OF October, 2019.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: 

GERALD D. REID, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 7/29/2019

Date of application acceptance: 7/31/2019

Date filed with the Board of Environmental Protection:

This Order prepared by Lisa P. Higgins, Bureau of Air Quality.

