



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**Bucksport Mill LLC
Hancock County
Bucksport, Maine
A-22-77-15-M**

**Departmental
Findings of Fact and Order
New Source Review
NSR #13**

FINDINGS OF FACT

After review of the minor revision amendment 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, §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Facility	Bucksport Mill LLC (Bucksport Mill)
License Amendment Type	06-096 CMR 115 Minor Revision
NAICS Code	221112, Fossil Fuel Electric Power Generation
Nature of Business	Electric Services
Facility Location	2 River Road, Bucksport, Maine

Bucksport Mill LLC (Bucksport Mill) operates electric power generation equipment and is licensed as a major source through its Part 70 Air Emission License (A-22-70-A-I, December 30, 2004) with various Part 70 amendments and New Source Review amendments.

Bucksport Mill submitted a New Source Review minor revision application to revise the stack testing deadlines for ammonia, particulate matter (PM), and PM_{2.5} for Boiler 8 due to the temporary shutdown of the boiler. This minor revision application proposes to adjust the stack testing language in air emission license A-22-77-4-A (November 29, 2010), as amended in air emission licenses A-22-77-6-M (June 30, 2011), A-22-77-9-M (April 9, 2013), and A-22-77-10-A (July 31, 2013) for Boiler 8.

B. Emission Equipment

The emission unit addressed in this amendment is Boiler 8 (814 MMBtu/hr). The licensed allowed fuels include biomass (wood waste, wood chips, bark, paper mill

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sludge, waste papers, and fiber core ends), fuel oil (specification waste oil, off-specification waste oil, and fuel oil), and natural gas.

C. Application Classification

This application request does not result in increased emissions of any pollutant and only revises the stack test dates for Boiler 8. Therefore, the Department has classified the application as a minor revision to New Source Review license A-22-77-4-A and its associated amendments: A-22-77-6-M, A-22-77-9-M, and A-22-77-10-A. The application has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended).

II. MINOR REVISION DESCRIPTION

Bucksport Mill has submitted a revision to address the timeframe for the follow-up stack testing on Boiler 8.

A. Background

The upgrade to the multi-fuel fired Boiler 8 was licensed in amendment A-22-77-4-A for an increase in the biomass feed rate of the unit (from 26 tons/hour to approximately 80 tons/hour) to allow for the production of additional energy from a new 25 MW steam turbine generator. Subsequent amendments were issued to clarify the compliance dates for the new lb/MMBtu emission limits and to clarify the timeframes for initial stack testing. Bucksport Mill has performed the initial stack testing, but is required to perform follow-up stack testing.

B. Request for Stack Test Deadline Revisions

Bucksport Mill has requested additional time to perform the follow-up stack testing required in air emission license amendment A-22-77-10-A due to the temporary shutdown of Boiler 8. The facility is under new ownership, and although Boiler 8 was operational during the first quarter of 2015, the unit was shut down on April 20, 2015. The shutdown occurred due to the electrical market's condition and the cost of biomass and, at this time, it is unknown when Boiler 8 will be restarted.

The initial required stack testing was performed on August 7, 8, and 14, 2014, following the upgrade of Boiler 8. This amendment addresses the subsequent stack testing requirements.

Condition (2)(F) states, as most recently amended in A-22-77-10-A (July 31, 2013):

(2)(F) Ammonia emissions shall not exceed 40 ppmdv from startup of the upgraded boiler until 24 months later when the limit shall be 20 ppmdv. Compliance with

the ammonia limit shall be demonstrated by a stack test conducted within 12 months of Boiler 8 achieving sustainable full load or within 12 months of February 15, 2014, whichever date is earlier. For the purposes of stack testing timeframes, sustainable full load shall be defined as operating at an average steam load equal to or greater than 390,000 lb/hr for a 30 consecutive day period. ***A subsequent ammonia stack test shall be performed again within 24 months of the initial test and by request thereafter.*** The stack test shall be performed in accordance with the appropriate 40 CFR Part 60, Appendix A Method or other method as approved by EPA and the Department. [*emphasis added*]

Condition (2)(H) states, as most recently amended in A-22-77-10-A (July 31, 2013):

(2)(H) The facility shall perform stack tests on Boiler 8 to determine compliance with the PM emission limits (lb/MMBtu and lb/hr). A PM stack test shall be performed within 6 months of Boiler 8 achieving sustainable full load or within 6 months of February 15, 2014, whichever date is earlier. ***A subsequent PM stack test shall be performed again within 12 months of the initial test and every other year thereafter.*** The stack tests shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 1-5 or other method as approved by EPA and the Department.

The facility shall perform PM_{2.5} stack tests on Boiler 8. A PM_{2.5} stack test shall be performed within 6 months of Boiler 8 achieving sustainable full load or within 6 months of February 15, 2014, whichever date is earlier. ***A subsequent PM_{2.5} stack test shall be performed again within 12 months of the initial test and by request thereafter.*** The stack tests shall be performed in accordance with the appropriate EPA method or other method as approved by EPA and the Department. The facility shall submit an amendment application to the Department which shall include a proposed lb/MMBtu PM_{2.5} limit for the boiler within 6 months of the second test date.

For the purposes of stack testing timeframes, sustainable full load shall be defined as operating at an average steam load equal to or greater than 390,000 lb/hr for a 30 consecutive day period.

[*emphasis added*]

Due to the current shutdown of Boiler 8, the Department approves revising conditions (2)(F) and (2)(H) as addressed in air emission license amendment A-22-77-10-A (and also noted in A-22-77-4-A, A-22-77-6-M, and A-22-77-9-M) to allow for the PM, PM_{2.5}, and ammonia follow-up stack testing for Boiler 8 to be performed within 60 days of Boiler 8 achieving a sustainable full load once the boiler re-starts or within 120 days of re-start, whichever date is earlier. For the purposes of stack testing timeframes, sustainable full load shall be defined as operating at an average steam load equal to or greater than 390,000 lb/hr for a 30 consecutive day period.

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 Air Emission License A-22-77-15-M, subject to the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License 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.

SPECIAL CONDITIONS

The following shall replace Condition 2(F) in Air Emission Licenses A-22-77-4-A, A-22-77-6-M, A-22-77-9-M, and A-22-77-10-A:

- (2) F. Ammonia emissions shall not exceed 40 ppmdv from startup of the upgraded boiler until 24 months later when the limit shall be 20 ppmdv. Compliance with the 40 ppmdv ammonia limit was demonstrated by a stack test in August 2014 and compliance with the 20 ppmdv ammonia limit shall be demonstrated by a stack test conducted within 60 days of Boiler 8 achieving sustainable full load after re-start or within 120 days of re-start, whichever date is earlier; and by request thereafter. For the purposes of stack testing timeframes, sustainable full load shall be defined as operating at an average steam load equal to or greater than 390,000 lb/hr for a 30 consecutive day period. The stack test shall be performed in accordance with the appropriate 40 CFR Part 60, Appendix A Method or other method as approved by EPA and the Department. [06-096 CMR 115, BACT]

The following shall replace Condition 2(H) in Air Emission Licenses A-22-77-4-A, A-22-77-6-M, A-22-77-9-M, and A-22-77-10-A:

- (2) H. As a follow-up to the August 2014 initial stack tests performed on Boiler 8 to determine compliance with the PM emission limits (lb/MMBtu and lb/hr), Bucksport Mill shall perform a subsequent PM stack test within 60 days of Boiler 8 achieving sustainable full load after re-start or within 120 days of re-

start, whichever date is earlier; and every other year thereafter. The stack tests shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 1-5 or other method as approved by EPA and the Department.

As a follow-up to the August 2014 initial PM_{2.5} stack tests performed on Boiler 8, Bucksport Mill shall perform a subsequent PM_{2.5} stack test within 60 days of Boiler 8 achieving sustainable full load after re-start or within 120 days of re-start, whichever date is earlier; and by request thereafter. The stack tests shall be performed in accordance with the appropriate EPA method or other method as approved by EPA and the Department. Bucksport Mill shall submit an amendment application to the Department which shall include a proposed lb/MMBtu PM_{2.5} limit for the boiler within 6 months of this second test date.

For the purposes of stack testing timeframes, sustainable full load shall be defined as operating at an average steam load equal to or greater than 390,000 lb/hr for a 30 consecutive day period.

[06-096 CMR 115, BACT]

DONE AND DATED IN AUGUSTA, MAINE THIS 17 DAY OF July, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Maureen Robert Coro for
PATRICIA W. AHO, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: May 15, 2015

Date of application acceptance: May 19, 2015

Date filed with the Board of Environmental Protection:

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.

