



DEPARTMENT ORDER

**Sappi North America, Inc.
Cumberland County
Westbrook, Maine
A-29-70-K-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #1**

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	Sappi North America, Inc.
LICENSE TYPE	Part 70 Administrative Revision
NAICS CODES	322121
NATURE OF BUSINESS	Paper Mill
FACILITY LOCATION	89 Cumberland St, Westbrook, Maine

The Westbrook mill of Sappi North America, Inc. (Sappi) is a non-integrated paper mill producing specialty coated papers from purchased paper. Sappi has requested clarification regarding testing requirements for #20 Coater.

B. Emission Equipment

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

Process Equipment

Equipment	Process Rate	Pollution Control Equipment	Installation Date
#20 Coater	70 ton/day	Catalytic Incinerator Wet Scrubbers	1984

C. Revision Description

The #20 Coater is an off-machine coater that utilizes a Catalytic Incinerator to control VOC emissions from an air knife applicator when running grades of coating containing greater than 2.9 pounds of VOC per gallon of coating applied in that air knife. Sappi is not required to operate the Catalytic Incinerator when #20 Coater is applying coatings containing less than 2.9 pounds of VOC per gallon (low-solvent coatings).

There are VOC emission standards that must be met when applying coatings containing greater than 2.9 pounds of VOC per gallon, and compliance is demonstrated through regular stack testing. Condition (27)(E)(4) of Air Emission License A-29-70-J-R/A states:

Compliance with the VOC emission limits for #20 Coater when not using low solvent coatings shall be demonstrated through performance testing conducted every other calendar year. The next performance test is due no later than 12/31/2022. Performance testing shall be conducted while in accordance with the requirements of 06-096 C.M.R. ch. 123 and 06-096 C.M.R. ch. 126.

[06-096 C.M.R. ch. 140, BPT (A-29-70-A-I, 12/31/2003)]

Sappi has reduced the VOC loading of the coatings and at present is not running coating with greater than 2.9 pound of VOC per gallon. As such, the Catalytic Incinerator is not being operated. It is not the Department's intent to require Sappi to change to higher-VOC coatings and start up the Catalytic Incinerator solely to perform testing. Therefore, this condition is amended as follows to clarify that testing may be delayed until Sappi resumes the use of coating with a higher VOC content:

Compliance with the VOC emission limits for #20 Coater when not using low-solvent coatings shall be demonstrated through performance testing conducted at least once every two years with no more than 25 months between tests. If #20 Coater is using only low-solvent coatings at the time a test is due, testing may be delayed. If delayed, testing shall be conducted within 60 days of resuming use of coating with greater than 2.9 pound of VOC per gallon. Performance testing shall be conducted while in accordance with the requirements of 06-096 C.M.R. ch. 123 and 06-096 C.M.R. ch. 126. [06-096 C.M.R. ch. 140, BPT]

D. 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 Administrative Revision is for license changes that correct typographical errors; change the name, address, or phone number of any person or facility identified in the Part 70 license or a similar administrative change at the Part 70 source; or result in more frequent monitoring, reporting, recordkeeping or testing requirements.

The requested revision to clarify testing requirements when using only low-solvent coatings meets the definition of a Part 70 Administrative Revision and has been processed under *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

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-29-70-K-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-29-70-J-R/A and the following conditions.

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.

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SPECIFIC CONDITIONS

The following shall replace Condition (27)(E)(4) of Air Emission License A-29-70-J-R/A:

(27) **#20 Coater and Dryers**

E. Compliance Methods

4. Compliance with the VOC emission limits for #20 Coater when not using low-solvent coatings shall be demonstrated through performance testing conducted at least once every two years with no more than 25 months between tests. If #20 Coater is using only low-solvent coatings at the time a test is due, testing may be delayed. If delayed, testing shall be conducted within 60 days of resuming use of coating with greater than 2.9 pound of VOC per gallon. Performance testing shall be conducted while in accordance with the requirements of 06-096 C.M.R. ch. 123 and 06-096 C.M.R. ch. 126. [06-096 C.M.R. ch. 140, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 12th DAY OF SEPTEMBER, 2022.

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-29-70-J-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 8/3/2022

Date of application acceptance: 8/3/2022

Date filed with the Board of Environmental Protection:

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

