



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**Expera Old Town, LLC
Penobscot County
Old Town, Maine
A-180-70-H-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #5**

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

I. REGISTRATION

A. Introduction

FACILITY	Expera Old Town, LLC (Expera)
LICENSE TYPE	Part 70 Administrative Revision
NAICS CODES	322110 Wood Pulp Manufacturing 221119 Electric Power Generation
NATURE OF BUSINESS	Pulp Manufacturing
FACILITY LOCATION	24 Portland Street, Old Town, Maine

Expera is a pulp manufacturing facility in Old Town, Maine, capable of additional on-site energy and steam production. Expera is an existing stationary source currently operating under a Part 70 license (A-180-70-A-I, issued December 2, 2009) and subsequent amendments. Expera is considered a Part 70 major source as defined in *Definitions Regulations*, 06-096 Code of Maine Rules (CMR) 100 (as amended).

Expera has submitted a request to clarify the deadlines for performing particulate matter stack tests on #5 Power Boiler and the Biomass Boiler.

B. Emission Equipment

The stack testing schedule clarification addressed in this Part 70 License is for the following pieces of equipment: #5 Power Boiler and the Biomass Boiler.

C. Application Classification

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. As defined in 06-096 Code of Maine Rules (CMR) 100, a Part 70 Administrative Revision may also be used to incorporate the terms and conditions of a major New Source Review air license issued pursuant to 06-096 CMR 115 into a Part 70 license.

The requested revision was submitted solely for the purpose of clarifying the stack testing deadlines for Boiler 5 and the Biomass Boiler; therefore, the request meets the definition of a Part 70 Administrative Revision and has been processed under *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended).

II. PART 70 ADMINISTRATIVE REVISION REQUESTS

Expera has requested clarification of the requirements in the Part 70 license A-180-70-A-I (December 2, 2009) and amendment A-180-70-G-A (December 29, 2014) regarding particulate matter stack testing on #5 Power Boiler and the Biomass Boiler. The proposed clarification includes requiring stack testing to be performed on #5 Power Boiler within 30 days of when #6 fuel oil is fired in the unit and adding one month's time to the stack testing deadline on the Biomass Boiler due to the scheduled annual facility shutdown.

A. Background

The facility is required to stack test the following equipment biannually: #5 Power Boiler, Biomass Boiler, Recovery Boiler, Smelt Dissolving Tank, and Lime Kiln. Originally, the years of testing were 2010, 2012, 2014, etc.; however, due to the temporary shutdown of the facility from August 15, 2014 to December 2014, the acquisition of the facility by Expera in December 2014, and the time needed to restart the facility and bring the equipment up to normal operations under the new ownership, Expera was granted clarification of the stack testing schedule in the Part 70 Administrative Revision amendment A-180-70-G-A. Stack testing for the affected units is now required by June 30, 2015 (approximately 180 days from restarting some of the affected units) and every other calendar year thereafter.

Expera will be stack testing the Recovery Boiler, Smelt Dissolving Tank, and Lime Kiln by June 30, 2015, but has requested additional clarification of the stack testing requirements for the #5 Power Boiler and Biomass Boiler.

B. #5 Power Boiler Stack Testing

#5 Power Boiler is currently primarily utilized on a back-up basis and only operated 88 hours in 2014. The licensed fuel is #6 fuel oil, with distillate (#2 fuel oil) utilized for startup and operation at low loads.

Expera is in the process of obtaining a New Source Review amendment to allow the firing of #2 fuel oil during regular operations of the unit. Emissions from #5 Power Boiler will be reduced when firing distillate oil as compared to firing residual oil (#6 fuel oil). In addition, Expera intends to convert #5 Power Boiler to natural gas by the end of 2015. Emissions will be further minimized with the conversion of the boiler to natural gas.

Based on the minimal annual operation of #5 Power Boiler and the expectation of firing of distillate oil rather than residual oil when the unit does operate, Expera has requested that particulate matter testing be revised from requiring a stack test by June 30, 2015 to require a stack test within 30 days of firing #6 fuel oil. If the requirement remains as currently written, the unit will need to be operated using #6 fuel oil, solely for the purpose of conducting the stack test.

As was recognized in existing Condition 14(J) in air emission license A-180-70-A-I, the unit does not operate with much frequency. Condition 14(J) states:

‘Red Shield shall demonstrate compliance with the lb/MMBtu and lb/hr particulate matter limit by stack testing if the #5 Power Boiler is operated 1000 hours or greater over a five calendar year period. The particulate matter stack test shall be performed within 60 days of the end of the five year period in accordance with 40 CFR Part 60, Appendix A, Method 5.’

Condition 14(E) of A-180-70-A-I was revised in amendment A-180-70-G-A from stack testing for particulate matter every two years (unless the condition 14(J) operational hours caveat applies) to:

‘Stack testing by June 30, 2015 and per condition 14(J) thereafter.’

This condition was based on #6 fuel oil being the main fuel of the boiler and the recognized change of facility ownership.

The Department approves clarifying the particulate matter stack testing requirement schedule for #5 Power Boiler to require stack testing within 30 days after #6 fuel oil is fired in the unit, due to the limited use of the boiler and the switch to lower pollutant emitting fuels. At this time, condition 14(J) of air emission license A-180-70-A-I shall remain in effect to require stack testing if the unit is operated more often than it has in the recent past (i.e., 1000 hours or greater over a five calendar year period).

C. Biomass Boiler Stack Testing

The Biomass Boiler is scheduled to undergo needed repairs and maintenance during the cold mill outage scheduled for the week of June 22, 2015. Repairs and maintenance will also be performed on the Biomass Boiler's electrostatic precipitator.

Expera has requested that the stack testing for the Biomass Boiler take place after the repair and maintenance work is complete to be reflective of the operations and equipment condition moving forward.

The Department approves revising the stack testing timeframe on the Biomass Boiler from June 30, 2015 to July 31, 2015 to take into account the scheduled cold mill shutdown and the work planned for the unit and associated control equipment.

D. Facility Annual Emissions

The facility's annual emissions are not being revised with this amendment and shall remain as currently licensed.

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 A-180-70-H-A pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 115 and subject to the conditions found in Air Emission License A-180-70-A-I, in amendments A-180-70-B-A, A-180-70-C-A, and A-180-70-G-A and in the following conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 CMR 115 for making such changes and pursuant to the applicable requirements in 06-096 CMR 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, 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.

SPECIFIC CONDITIONS

The following shall replace the portion of Condition 14(E) addressing PM in air emission license A-180-70-A-I (December 2, 2009) and air emission license amendment A-180-70-G-A (December 29, 2014):

(14) #5 Power Boiler

E. Emissions from #5 Power Boiler shall not exceed the following limits:

Pollutant	lb/MMBtu	Ave Time	Compliance Method
PM	0.08	-	Stack Test within 30 days of the actual usage of #6 fuel oil in the boiler or per Condition 14(J), whichever is earlier

Pollutant	lb/hr	Ave Time	Compliance Method
PM	19.92	-	Stack Test within 30 days of the actual usage of #6 fuel oil in the boiler or per Condition 14(J), whichever is earlier

The following shall replace Condition 15(K)(1) in air emission license A-180-70-A-I (December 2, 2009) and air emission license amendment A-180-70-G-A (December 29, 2014):

(15) Biomass Boiler and Turbine

K. Emission Limit Compliance Demonstration

1. Expera shall conduct PM emission testing to demonstrate compliance by July 31, 2015 and every other calendar year thereafter (2017, 2019, etc.) for the Biomass Boiler.

DONE AND DATED IN AUGUSTA, MAINE THIS 15 DAY OF June, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Patricia W. Aho*
PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-180-70-A-I.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: May 11, 2015

Date of application acceptance: May 13, 2015

Date filed with the Board of Environmental Protection:

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

