



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

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ACTING COMMISSIONER

**Catalyst Paper Operations Inc.
Oxford County
Rumford, Maine
A-214-77-13-A**

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

FINDINGS OF FACT

After review of the New Source Review air emission license 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 (MRSA), Section 344 and Section 590, the Maine Department of Environmental Protection (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Catalyst Paper Operations Inc.
LICENSE TYPE	06-096 CMR 115, Minor Modification
NAICS CODES	322121
NATURE OF BUSINESS	Pulp & Paper Mill
FACILITY LOCATION	35 Hartford Street, Rumford, Maine

B. Amendment Description

Catalyst Paper Operations Inc. (Catalyst) has submitted an application to license the addition of a soap skimming system and concentrator to its Weak Liquor Tank #1 and to modify the Recovery Boiler fuel delivery system to burn the collected and concentrated soap, and to add specification waste oil as a licensed fuel in the Recovery Boiler and the Lime Kiln.

C. Emission Equipment

The following equipment is addressed in this NSR air emission license:

Fuel Burning Process Equipment

Equipment	Max. Capacity (MMBtu/hr)	Rate/Capacity	Fuel Type	Control Equipment	Stack #
Lime Kiln	100 (#6 fuel oil)	350 tons/day CaO	fuel oil ($\leq 2.0\%$ S); Natural gas; Specification waste oil; ¹ LVHC gases	Wet Scrubber	KILN
	110 (natural gas)				
Recovery Boiler C	759 (fuel oil)	4.4 MMlb BLS/day	fuel oil ($\leq 2.0\%$ S); Natural gas; Specification waste oil; ² Black liquor; Soap	Electrostatic Precipitator (ESP)	CREC

The soap skimmer is proposed for installation in the #1 Weak Liquor Tank. Although not required by applicable federal or state regulations, emissions from this tank's vents are captured and collected as part of the high volume, low concentration (HVLC) non-condensable gases control system at the facility.

D. Application Classification

The application to (1) add a soap skimming system and modify the Recovery Boiler C fuel delivery system to burn concentrated soap, and (2) add specification waste oil as a licensed fuel in Recovery Boiler C and the Lime Kiln does not violate any applicable federal or state requirements and does not propose to reduce monitoring, reporting, testing, or recordkeeping requirements.

The addition of specification waste oil as a licensed fuel in Recovery Boiler C and the Lime Kiln is not expected to cause changes in emissions.

In the soap skimming system/recovery boiler fuel delivery system project, referred to hereafter in this NSR license as the Soap Skimmer Project, Recovery Boiler C is undergoing physical changes, but other emissions units will be affected by those changes. The consistent metering of soap to the recovery boiler fuel delivery system is expected to result in an increase in black liquor solids (BLS) firing by approximately 1.25% on an annual basis. The increase in BLS firing will also bring about a pulp production increase, affecting emissions from the Lime Kiln and from Smelt Tank C. Other units whose emissions could

¹ Added in this NSR license

² Added in this NSR license

potentially be impacted by the recovery boiler modification were evaluated, and the findings are presented in the following table, with explanations:

Emissions Unit	Reason(s) for No Emissions Impact
Bleach Plant	Emissions of Cl ₂ and ClO ₂ from the Bleach Plant scrubber are typically at non-detect levels and are expected to remain at non-detect levels as a result of this project.
Paper Machines	The increase in fiber from this project will be processed in the Pulp Dryer; thus, there will be no change to emissions from these units as a result of this project.
Pulp Mill and Evaporator System LVHC, HVLC gases, and Condensate Treatment	Exhausts from most pulping and evaporator system equipment are collected in the LVHC or HVLC systems; and pulping and evaporator condensate streams are treated in the steam stripper system, so no significant fugitive emissions are expected as a result of this project.
Evaporators / Pulp Mill / Pulp Dryer	On an annual average basis, steam demand increases and reductions as a result of this project will result in a surplus of steam. This surplus is estimated to offset the additional steam demand on the pulp dryer to dry the additional pulp. Thus, there is no net increase in steam demand as a result of this project.
Boilers: #6, #7, #3 (Steam Generation)	There is no increase in steam demand on any of these three boilers as a result of this project; therefore, no emissions increases associated with steam generation are expected.
#6 and #7 Cogen Boilers (emissions from burning SOG, NCG, HVLC)	A negligible increase in the volume of pulping gases and foul condensates generated by the Pulp Mill and Evaporators is expected as a result of this project, both of which are treated with control devices/methods. Any emissions increase from the incremental condensates or gases is negligible.

Changes in emissions from the modified sources and all affected sources are accounted for in the application and in the table below.

A modification at a major source is considered a major or minor modification based on whether or not expected emissions increases exceed the “Significant Emission Increase” levels as given in *Definitions Regulation*, 06-096 Code of Maine Rules (CMR) 100 (as amended). The emission increases are determined by subtracting the baseline actual emissions of the 24 months preceding the modification (or representative 24 months) from the projected actual emissions. The 24-month period used as the basis for this analysis is from January 2012 through December 2013. Values were based on actual production and/or fuel usage data, as well as CEMS data, stack test results, and emission factors. The results of this comparison are provided in the table below.

Pollutant	Baseline Actual Emissions (ton/year)	Projected Actual Emissions (ton/year)	Net Emissions Increase (ton/year)	Sig. Emissions Increase Levels (ton/year)
PM	169.4	173.6	4.2	25
PM ₁₀	136.6	140.0	3.4	15
PM _{2.5}	124.8	127.9	3.1	10
SO ₂	79.2	81.2	2.0	40
NO _x	584.5	599.1	14.6	40
CO	434.1	445.0	10.9	100
VOC	38.6	39.5	0.9	40
TRS	12.3	12.6	0.3	10
CO _{2e}	795,843	815,739	19,896	75,000

Note: The above numbers are for Recovery Boiler C, Smelt Tank C, and the Lime Kiln only, resulting from the Soap Skimmer Project. No other units at the facility have emissions which are affected by the modifications authorized in this NSR license.

Therefore, this modification is determined to be a minor modification under *Minor and Major Source Air Emission License Regulations* 06-096 CMR 115 (as amended) since the changes being made are not addressed or prohibited in the Part 70 air emission license. An application to incorporate the requirements of this NSR license into the Part 70 air emission license shall be submitted no later than 12 months from commencement of the requested operation.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 CMR 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Specification Waste Oil Addition as a Licensed Fuel: Recovery Boiler C, Lime Kiln

The Lime Kiln was installed in 1989 and modified in 2008 to support firing #6 fuel oil, at an input capacity of 100 MMBtu/hour, or to fire natural gas, at an input capacity of 110 MMBtu/hour, either alone or together. Fuel oil fired in the

Lime Kiln has a maximum sulfur content of 2.0% by weight when there is no lime within the kiln and 2.5% by weight when there is lime within the kiln, allowed per 06-096 CMR 106 (4)(B). In addition, the Lime Kiln can fire low volume, high concentration streams of non-condensable gases (LVHCs) generated by the pulping process. Emissions from the Lime Kiln are controlled by a wet scrubber. The Lime Kiln is equipped to continuously monitor and record LVHCs firing duration (when applicable), scrubber media flow rate, scrubber liquid supply pressure to the scrubber, O₂, and total reduced sulfur compounds (TRS).

Recovery Boiler C was installed in 1981 and has the capacity to fire 4.4 million pounds (MMlb) of dry black liquor solids (BLS) per day or 759 MMBtu/hour of fuel oil. As an auxiliary fuel in Recovery Boiler C, Catalyst fires #6 fuel oil with a maximum sulfur content of 2.0% by weight when there is no smelt within the boiler, and 2.5% by weight when there is smelt within the boiler, allowed per 06-096 CMR 106 (4)(B). Catalyst is also licensed to fire natural gas and black liquor soap in Recovery Boiler C.

Catalyst has requested the inclusion of specification waste oil as a licensed fuel in the Lime Kiln and Recovery Boiler C. The specification waste oil, to be purchased from an off-site waste oil supplier, will be analyzed by the supplier to document compliance with the characterization of *specification waste oil* as defined in 06-096 CMR 860, *Waste Oil Management Rules*. There will be no addition of solvents or hazardous materials to the specification waste oil proposed for this use. The specification waste oil will be blended in the existing #6 oil storage tank and utilize the existing oil feed system for all sources. This additional fuel may be utilized to displace up to 100% of the #6 oil that the mill currently burns. No modifications to the Lime Kiln, to Recovery Boiler C, or to the corresponding control equipment are needed to accommodate the use of specification waste oil in these units, and licensed emission limits for the Lime Kiln and Recovery Boiler C shall not change because of the addition of this fuel.

Catalyst shall maintain records documenting compliance with the *specification waste oil* definition of 06-096 CMR 860 and the quantity of specification waste oil combusted in the Lime Kiln and in Recovery Boiler C both monthly and on an annual basis.

C. Soap Skimmer Project

1. Project Description

Soap byproducts from the kraft pulping process are entrained in black liquor exiting from the digesters. Soap has a lower density than black liquor; therefore, a soap layer collects at the surface in a storage tank. The soap skimmer in the #1 Weak Liquor Tank is designed to float on top of the black liquor and below the soap layer and collect the soap. Soap will flow from the floating skimmer to a standpipe, and then will be pumped to a device that will

increase the soap's density from about 3 lb/gallon to about 8 lb/gallon by breaking the bubbles and removing entrained air. The concentrated soap will then be metered into the recovery boiler for combustion.

Soaps that accumulate in concentrated black liquor storage tanks are not evenly distributed throughout the tank. As a result, soaps tend to be fed to the recovery boiler in "slugs," and firing rates and water/steam flow rates must be adjusted to accommodate the fuel feed variation. The facility is currently unable to sustain higher firing rates of black liquor in Recovery Boiler C because of such black liquor inconsistencies. The Soap Skimmer Project is expected to improve the recovery boiler's operation through more consistent feeding of black liquor and soaps to the boiler. After completion of this project, sustainable higher black liquor firing rates will allow for more black liquor to be fired per unit of time. Loosening of this bottleneck in the facility's pulping process will allow additional pulp to be produced in the digesters, calculated to be approximately 20 tons/day.

On an annual average basis, the Soap Skimmer Project is expected to result in approximately 20 tons/day of additional pulp production. This increase is expected to result from efficiency increases in the evaporators and in black liquor firing in Recovery Boiler C. A smaller quantity of soaps in the weak black liquor feed stream into the evaporators will also result in reduced evaporator scaling/fouling.

There is no projected increase in net steam demand because of this project. The facility estimates additional digester steam demand of 1.8 thousand pounds per hour (kpph) for the additional pulp production. At the same time, a net reduction of 3 kpph in steam demand for the evaporators is expected due to removal of soap from the feed, reduction of scale, and reduction of excess water removed with the soap from the liquor tanks. The additional BLS fired is calculated to generate 7.5 kpph of additional steam. Overall, the project will result in a surplus of 8.7 kpph of steam. This surplus is estimated to offset the additional steam demand on the pulp dryer to dry the additional 20 tons/day of pulp. Thus, there will be no increase in net steam demand, no additional fuel firing required, and no emissions increase associated with steam generation. Emissions increases resulting from this project will be from Recovery Boiler C firing additional BLS and the Lime Kiln and Smelt Tank C processing additional material.

Physical changes to regulated emissions equipment are changes to the fuel delivery system for Recovery Boiler C. The change will not increase the licensed heat input capacity and/or emission rate limits of Recovery Boiler C.

2. New Source Performance Standards (NSPS)

40 CFR Part 60, Subpart D

Recovery Boiler C will continue to operate in such a manner so as to remain below a fossil fuel firing annual capacity factor of 10%; therefore, the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart D, *Standards of Performance for Fossil-Fuel-Fired Steam Generators*, continues to not be applicable to this unit.

40 CFR Part 60, Subpart BB

Recovery Boiler C is considered an existing unit and is subject to 40 CFR Part 60, Subpart BB, *Standards of Performance for Kraft Pulp Mills*, since it was manufactured after September 24, 1976. Catalyst shall continue to meet the applicable requirements of this NSPS Subpart.

40 CFR Part 60, Subpart BBa

40 CFR Part 60, Subpart BBa, *Standards of Performance for Kraft Pulp Mill Affected Sources for Which Construction, Reconstruction, or Modification Commenced After May 23, 2013*, could apply to this source if this modification to Recovery Boiler C is considered reconstruction or a modification as defined per this Subpart. Under NSPS 40 CFR §60.14, a modification is “any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies.” Recovery Boiler C will remain in compliance with the currently applicable license limits and Subpart BB requirements. Thus, the project does not constitute a modification to the unit pursuant to 40 CFR §60.14.

Under NSPS 40 CFR §60.15, reconstruction means “the replacement of components of an existing facility to such an extent that the fixed capital cost of the new components exceeds 50% of the fixed capital cost that would be required to construct a comparable entirely new facility.” The estimated cost of the proposed project is far less than 50% of the cost to construct a new recovery boiler. Therefore, this project does not constitute reconstruction of the unit, as defined in 40 CFR §60.15.

Because the proposed fuel feed modification does not constitute a modification or reconstruction under 40 CFR Part 60, this project does not trigger applicability of 40 CFR Part 60, Subpart BBa.

3. National Emission Standards for Hazardous Air Pollutants (NESHAP)

Subpart MM

Recovery Boiler C is subject to 40 CFR Part 63, Subpart MM – *National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicemical Pulp Mills* and the applicable provisions contained in 40 CFR Part 63,

Subpart A, *General Provisions*. Because this unit is not being reconstructed according to the definition relevant to Subpart MM applicability, Recovery Boiler C remains subject to the applicable requirements of Subpart MM for existing recovery boilers and not subject to the new source requirements. The Soap Skimmer Project will not change the requirements under Subpart MM applicable to Recovery Boiler C.

Subpart DDDDD

Recovery Boiler C is not subject to 40 CFR Part 63, Subpart DDDDD *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters* (Boiler MACT standards) because units covered by 40 CFR Part 63, Subpart MM are not subject to the Boiler MACT standards. [40 CFR Part 63, § 63.7491(f)]

4. Best Available Control Technology (BACT)

Maine regulations require an analysis and determination of BACT for any pollutant emitted from a modified emissions unit, per 06-096 CMR 115 (4)(A)(4)(d). Because the only unit modified as part of the Soap Skimmer Project is Recovery Boiler C, a BACT analysis is provided for pollutants from this unit, summarized in the following paragraphs.

Particulate Matter (PM, PM₁₀, PM_{2.5}) BACT

The majority of particulate matter emissions generated in Recovery Boiler C are sodium sulfates, with minor amounts of sodium carbonate and sodium chloride. Minimal potassium compounds and trace amounts of other metal compounds may also be present. The particulate matter emissions are generally hygroscopic and comprised of roughly 66% PM₁₀ and less than 50% PM_{2.5}. Potential PM control technologies include fabric filters, electrostatic precipitators (ESPs), and wet scrubbers.

Due to the high moisture content and hygroscopic nature of PM emissions from recovery boilers, fabric filters would rapidly clog and become inoperable, making this option technically infeasible. ESPs use high-voltage fields to apply electrical charge to particles, which then are attracted to and collect on oppositely charge collection surfaces. The accumulated dust is then dislodged from the collectors. Wet scrubbers transfer entrained particles from the gas stream to a liquid stream, requiring large quantities of water and generating a waste stream requiring proper treatment and disposal.

Catalyst currently utilizes an ESP on Recovery Boiler C to control particulate emissions to meet the emission standards of 40 CFR Part 63, Subpart MM. The facility proposes as BACT the continued use of the ESP and compliance with the applicable emission limits for control of particulate matter from Recovery Boiler C. The Department concurs with this BACT assessment.

Sulfur Dioxide (SO₂) BACT

Black liquor combusted in the recovery boiler has a sulfur content of approximately 3-5% by weight. While the majority of the sulfur exits the recovery boiler as smelt, about 1% exits the boiler as gaseous or particulate compounds. Recovery boilers are operated in such a way as to ensure high levels of sodium fumes in order to capture the SO₂ produced from reduced sulfur compounds oxidation. Potential ways to control SO₂ emissions from recovery boilers include staged combustion to optimize liquor and combustion air properties for maximum and uniform temperatures in the lower furnace. A wet scrubber is an add-on control option for SO₂ control.

Catalyst uses staged combustion to optimize liquor and combustion air properties using primary, secondary, and tertiary combustion air in the boiler firebox. The existing use of tertiary staged combustion can minimize SO₂ emissions to levels below those attainable through the use of a wet scrubber. Further, the use of a wet scrubber is not economically or environmentally justified, given the capital and ongoing costs, water demand, waste stream disposal, and energy requirements to operate a wet scrubber after the ESP.

The facility proposes as BACT for SO₂ emissions the existing tertiary staged combustion and compliance with the currently licensed limits. The Department concurs with this BACT assessment.

Nitrogen Oxides (NO_x) BACT

Emissions of NO_x from Recovery Boiler C result through a combination of three mechanisms:

- Fuel NO_x, from the oxidation of fuel-bound nitrogen in the combustion process, resulting in the majority of the NO_x emitted from this unit;
- Thermal NO_x, from dissociation and subsequent oxidation of nitrogen (N₂) in the combustion air at temperatures greater than 2,900 °F; and
- Prompt NO_x, forming from the high-speed oxidation of hydrocarbon radicals near the combustion flame, producing an insignificant amount of NO_x compared to the other two mechanisms.

The staged combustion arrangement in Recovery Boiler C, with a reducing zone in the lower part of the furnace and an oxidizing zone further up in the liquor spray guns and secondary and tertiary air regions of the furnace, suppresses excessive NO_x formation. In addition, black liquor, the primary substance combusted in the recovery boiler, has relatively low nitrogen content as compared to other fuels.

Potential control of NO_x emissions could be achieved using add-on control devices such as selective catalytic reduction (SCR) and selective non-catalytic reduction (SNCR). Demonstrated NO_x control technologies include staged combustion and proper operation. SCR is not a technically viable option, since particulate entrained in the exhaust gases would clog the catalyst bed,

requiring installation of SCR after the ESP. However, gases would then have to be reheated between the ESP and the SCR to achieve the temperatures for optimum SCR effectiveness. This option is technically and economically prohibitive. SNCR includes the injection of a reducing agent in the post-combustion flue gas. This entails extensive technical difficulty in altering the injection rate and location as needed to accommodate the range of conditions over which a recovery boiler is operated. SNCR also introduces significant safety risks of water from related reactions reaching the furnace floor and causing a smelt-water explosion. Neither of these options is technical feasible for this unit.

Catalyst proposes proper operation and combustion controls with tertiary staged combustion air and compliance with the currently licensed limits as BACT for NO_x emissions from Recovery Boiler C. The Department concurs with this BACT assessment.

Carbon Monoxide (CO) and Volatile Organic Compounds (VOC) BACT

Emissions of CO and VOC result from incomplete combustion of fuels. These emissions can be minimized using staged combustion and good combustion practices or with add-on control devices such as an oxidation catalyst. Good combustion practices include controlling combustion temperatures, proper maintenance including proper controls of the air/fuel ratio, and maintenance of atomizing air pressure at optimum levels. The effectiveness of good combustion practices is enhanced through the use of staged combustion.

The use of an oxidation catalyst reduces CO and VOC emissions, but it also causes a portion of the SO₂ in the exhaust gas to oxidize to SO₃, which reacts with water in the exhaust gas and in the atmosphere to form sulfuric acid mist (H₂SO₄), or acid rain, and would increase fine particulate emissions. Also, the oxidation catalyst would have to be installed after the ESP, which would result in incoming gases below ideal temperatures for effective catalyst use.

The facility has proposed as BACT for CO and VOC emissions the use of good combustion practices and staged combustion and compliance with the currently licensed limits. The Department concurs with this BACT assessment.

5. NSR Future Project Emissions Reporting

As shown by the baseline-actual-to-projected-actual emissions comparisons table above, the emissions increases from this project are less than 50% of the Prevention of Significant Deterioration (PSD) significance levels. Since these calculations indicate the anticipated emissions increase associated with the this project will not exceed 50% of the PSD significance levels, the project is deemed to *not* have a “reasonable possibility” of resulting in a significant net

emissions increase, in accordance with 40 CFR §52.21(r)(6)(vi); thus, pre- and post-project recordkeeping and reporting requirements do not apply. Catalyst is not required to track future actual emissions from this project. [40 CFR Part 52, §52.21(r)(6)]

D. Incorporation into the Part 70 Air Emission License

The requirements in this 06-096 CMR 115 New Source Review license shall apply to the facility upon amendment issuance. Per *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended), Section 1(C)(8), for a modification that has undergone NSR requirements or been processed through 06-096 CMR 115, the source must then apply for an amendment to the Part 70 license within one year of commencing the proposed operations as provided in 40 CFR Part 70.5.

E. Annual Emissions

This NSR minor modification license will not result in any changes to the annual emissions totals currently in Catalyst's air emission license, including any amendments. License allowed annual emissions remain unchanged.

III. AMBIENT AIR QUALITY ANALYSIS

Catalyst previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. [See NO_x modeling results in license A-214-71-AN-A (April 9, 2002) and modeling results for other pollutants in license A-214-71-S-A/R (September 3, 1996).] An additional ambient air quality analysis is not required for this NSR license.

ORDER

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

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

The Department hereby grants New Source Review Air Emission License A-214-77-13-A pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the specific conditions below.

Severability. The invalidity or unenforceability of any provision of this NSR License or part thereof shall not affect the remainder of the provision or any other provisions. This NSR License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

SPECIFIC CONDITIONS

- (1) **Specification Waste Oil Addition as a Licensed Fuel: Recovery Boiler C, Lime Kiln**
 - A. Catalyst is licensed to fire fuel oil, natural gas, LVHC gases, and specification waste oil in the Lime Kiln. The facility shall continue to comply with the emission limits for the Lime Kiln and other requirements as specified in air emission license A-214-70-G-R/A (February 13, 2014), subsequently issued Part 70 license amendments, and NSR licenses issued pertaining to the facility's Lime Kiln.
 - B. Catalyst is licensed to fire black liquor, fuel oil, natural gas, specification waste oil, and soap in Recovery Boiler C. The facility shall continue to comply with the emission limits for Recovery Boiler C and other requirements as specified in air emission license A-214-70-G-R/A (February 13, 2014), subsequently issued Part 70 license amendments, and NSR licenses issued pertaining to Recovery Boiler C.
 - C. The waste oil fired in the Lime Kiln and in Recovery Boiler C shall meet the definition of "specification waste oil" as defined in 06-096 CMR 860, *Waste Oil Management Rules*. Documentation of compliance with this requirement shall be maintained on-site. [06-096 CMR 115, BACT/BPT]
 - D. Catalyst shall maintain records of the quantity of specification waste oil combusted in the Lime Kiln and in Recovery Boiler C both monthly and on an annual basis. [06-096 CMR 115, BACT/BPT]
- (2) Catalyst is licensed to install a soap skimming system and concentrator to its Weak Liquor Tank #1 and to modify the Recovery Boiler C fuel delivery system to burn this concentrated soap.

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- (3) Catalyst shall submit an application to incorporate this NSR license into the facility's Part 70 air emission license no later than 12 months from commencement of the requested operation. [06-096 CMR 140, Section 1(C)(8)]

DONE AND DATED IN AUGUSTA, MAINE THIS 12 DAY OF November, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Corne for
AVERY T. DAY, ACTING COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 20, 2015

Date of application acceptance: August 20, 2015

Date filed with the Board of Environmental Protection:

This Order prepared by Jane E. Gilbert, Bureau of Air Quality.

