



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**Woodland Pulp LLC
Washington County
Baileysville, Maine
A-215-70-L-A**

**Departmental
Findings of Fact and Order
Part 70 Minor License Modification
Amendment #2**

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 (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Woodland Pulp LLC (Woodland Pulp)
LICENSE TYPE	Part 70 Minor License Modification
NAICS CODES	32211
NATURE OF BUSINESS	Pulp Production
FACILITY LOCATION	144 Main Street, Baileysville, Maine

Woodland Pulp has the potential to emit more than 100 tons per year (TPY) of particulate matter (PM), Particulate Matter under 10 micrometers (PM₁₀), particulate matter under 2.5 micrometers (PM_{2.5}), sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon monoxide (CO) and 50 TPY of volatile organic compounds (VOC) and 100,000 TPY of carbon dioxide equivalent (CO_{2e}); therefore, the source is a major source for criteria pollutants. Woodland Pulp has the potential to emit more than 10 TPY of a single hazardous air pollutant (HAP) or more than 25 TPY of combined HAP; therefore, the source is a major source for HAP.

Woodland Pulp has requested an amendment to its air emission license to include two emergency engines subject to applicable requirements of 40 CFR Part 63, Subpart ZZZZ; to include an emergency fire pump engine subject to applicable requirements of 40 CFR Part 60, Subpart IIII; and to incorporate the terms and conditions of New Source Review (NSR) License #8 (A-215-77-8-M) issued to the facility on July 3, 2014.

B. Emission Equipment

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

Generators/Engines

<u>Equipment</u>	<u>Max. Heat Input Capacity (MMBtu/hr)</u>	<u>Max. Firing Rate (gal/hr)</u>	<u>Output</u>	<u>Fuel Type, % sulfur</u>	<u>Mfr. Date</u>	<u>Install. Date</u>
#1 Fire Pump	1.7	12.4	175 kW	Diesel, 0.0015% by weight	8/9/85	8/31/85
#2 Fire Pump	2.9	21.2	298 kW		5/2008	1/25/10
Lime Kiln Auxiliary Drive Engine	0.32	2.3	46.5 hp (33.4 kW)		1986	2014

C. Application Classification

A Part 70 Minor License Modification is for a license change that meets the following criteria:

- Does not violate any Applicable requirement;
- Does not involve a Part 70 Significant License Modification to existing monitoring, reporting, or recordkeeping requirements in the license;
- Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impact or a visibility or increment analysis;
- Does not seek to establish or change a Part 70 license term or condition for which there is no corresponding underlying Applicable requirement, and that the source has assumed to avoid an Applicable requirement to which the source would otherwise be subject. Such terms and conditions include the following: a federally enforceable emissions cap assumed to avoid classification as a Title I modification or a modification or reconstruction under any provision of Section 111, or 112 of the Clean Air Act (CAA), and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the CAA;
- Is not a Title I modification or a modification or reconstruction under any provision of Section 111 or 112 of the CAA, and
- Is not required by the Department to be processed under Part 70 Significant License Modification procedures.

The request to include the Stationary Reciprocating Internal Combustion Engines (RICE) NESHAP as an applicable requirement in the Part 70 Air Emission License is not a Part 70 Significant License Modification. The facility is not proposing substantial changes to existing monitoring and testing requirements, nor is it proposing the relaxation of existing license conditions (definition of Part 70 Significant Modification).

The facility's request is classified as a Part 70 Minor License Modification and has been processed under *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (CMR) 140 (as amended).

II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

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 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 existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. #1 Fire Pump, #2 Fire Pump, and Lime Kiln Auxiliary Drive Engine

Woodland Pulp operates three emergency generators and engines, the #1 Fire Pump, the #2 Fire Pump, and the Lime Kiln Auxiliary Drive Engine. These diesel-fired emergency units are rated at 1.7 MMBtu/hour, 2.9 MMBtu/hour, and 0.32 MMBtu/hour and were manufactured in 1985, 2008, and 1986, respectively.

1. New Source Performance Standards (NSPS)

The #1 Fire Pump was manufactured and installed prior to the applicability dates of the federal regulation 40 CFR Part 60, Subpart III, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* (CI ICE); thus, the unit is not subject to requirements under this subpart. The Lime Kiln Auxiliary Engine was remanufactured since its original manufacture date of 1986, but as provided in NSR license A-215-77-8-M (July 3, 2014), the cost of remanufacturing was less than 50% of the cost of an entirely new unit; thus, the unit's date of manufacture is the original manufacture date, and the Lime Kiln Auxiliary Engine is also not subject to requirements under 40 CFR Part 60, Subpart III.

The federal regulation 40 CFR Part 60, Subpart III is applicable to the **#2 Fire Pump**, since the unit was ordered after July 11, 2005, and manufactured after April 1, 2006. By meeting the requirements of

Subpart IIII, the unit also meets the requirements found in the NESHAP regulation *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 CFR Part 63, Subpart ZZZZ.

a. Emergency Definition of Subpart IIII [40 CFR §60.4211(f) and §60.4219]

Emergency stationary ICE means any stationary reciprocating internal combustion engine that meets all of the following criteria:

- (1) The stationary ICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary ICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary ICE used to pump water in the case of fire or flood, etc. There is no time limit on the use of emergency stationary ICE in emergency situations.
- (2) Paragraph (1) above notwithstanding, the #2 Fire Pump may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; or Woodland Pulp's insurance carrier. Woodland Pulp may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
- (3) Paragraphs (1) and (2) above notwithstanding, the #2 Fire Pump may be operated for up to 50 hours per calendar year in non-emergency situations. These 50 hours are counted as part of the 100 hours per calendar year for maintenance checks and readiness testing, as provided in paragraph (2) above.

b. 40 CFR Part 60, Subpart IIII Requirements

(1) Emission Standards Compliance Documentation

The #2 Fire Pump is subject to applicable emission standards identified in Table 4 to Subpart IIII of 40 CFR Part 60. [40 CFR §60.4205 (c)]

Compliance is demonstrated through maintenance of records of engine manufacturer data indicating compliance with the applicable standards. A copy of these records has been submitted as part of the application for this amendment and shall also be maintained on-site by Woodland Pulp. [40 CFR §60.4211 (b)(3)]

(2) Ultra-Low Sulfur Diesel Requirement

The diesel fuel fired in the #2 Fire Pump shall not exceed 15 ppm sulfur (0.0015% sulfur), except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. [40 CFR §60.4207(b)]

(3) Non-Resettable Hour Meter Requirement

A non-resettable hour meter shall be installed and operated on the #2 Fire Pump. [40 CFR §60.4209(a)]

(4) Operation and Maintenance Requirement

The #2 Fire Pump shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by the facility that are approved by the engine manufacturer. Woodland Pulp may only change those emission-related settings that are permitted by the manufacturer. [40 CFR §60.4211(a)]

(5) Annual Time Limit for Maintenance and Testing

The #2 Fire Pump shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations. [40 CFR §60.4211(f)]

(6) Initial Notification Requirement

No initial notification is required for emergency engines. [40 CFR §60.4214(b)]

(7) Recordkeeping Requirements

Woodland Pulp shall keep records that include maintenance conducted on the #2 Fire Pump and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours spent in emergency operation, including what classified the situation as emergency, and the number of hours spent in non-emergency operation. [40 CFR §60.4214(b)]

2. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

The federal regulation 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines* is applicable to the **#1 Fire Pump** and the **Lime Kiln Auxiliary Drive Engine**. The units are considered existing, emergency stationary reciprocating internal combustion engines (RICE) at a major HAP source and are not subject to NSPS regulations. EPA's August 9, 2010 memo (entitled "Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE") specifically does not exempt these units from the federal requirements.

a. Emergency Definition of Subpart ZZZZ

Emergency stationary RICE means any stationary reciprocating internal combustion engine that meets all of the following criteria:

- (1) The stationary RICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc. There is no time limit on the use of emergency stationary ICE in emergency situations.
- (2) Paragraph (1) above notwithstanding, the #1 Fire Pump and the Lime Kiln Auxiliary Drive Engine may each be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; or Woodland Pulp's insurance carrier. Woodland Pulp may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- (3) Paragraphs (1) and (2) above notwithstanding, the #1 Fire Pump and the Lime Kiln Auxiliary Drive Engine may each be operated for up to 50 hours per calendar year in non-emergency situations. These 50 hours are counted as part of the 100 hours per calendar year for

maintenance checks and readiness testing, as provided in paragraph (2) above.

The #1 Fire Pump and the Lime Kiln Auxiliary Drive Engine shall be limited to the usage outlined in 40 CFR §63.6640(f) and therefore may be classified as existing emergency stationary RICE as defined in 40 CFR Part 63, Subpart ZZZZ. Failure to comply with all of the applicable requirements listed in §63.6640(f) may cause these engines to not be considered emergency engines and therefore subject to all the requirements for non-emergency engines.

b. 40 CFR Part 63, Subpart ZZZZ Requirements

(1) Operation and Maintenance Requirements

For the #1 Fire Pump and the Lime Kiln Auxiliary Drive Engine, Woodland Pulp shall comply with the following requirements [40 CFR §63.6603(a) and Table 2(d)]:

- Change oil and filter every 500 hours of operation or annually, whichever comes first;
- Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The units shall be operated and maintained according to the manufacturer's emission-related written instructions, or Woodland Pulp shall develop a maintenance plan which provides to the extent practicable for the maintenance and operation of each engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]

(2) Optional Oil Analysis Program

Woodland Pulp has the option of utilizing an oil analysis program which complies with the requirements of 40 CFR §63.6625(i) in order to extend the specified oil change requirement. If this option is used, Woodland Pulp shall keep records of the parameters that are analyzed as part of the program, the results of each analysis, and the oil changes for each engine. The analysis program must be part of the maintenance plan for each engine. [40 CFR §63.6625(i)]

(3) Non-Resettable Hour Meter Requirement

A non-resettable hour meter shall be installed and operated on the #1 Fire Pump and the Lime Kiln Auxiliary Drive Engine. [40 CFR §63.6625(f)]

(4) Startup Idle and Startup Time Minimization Requirements

During periods of startup of the #1 Fire Pump or the Lime Kiln Auxiliary Drive Engine, the facility must minimize each engine's time spent at idle and minimize each engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR §63.6625(h) & 40 CFR Part 63, Subpart ZZZZ, Table 2d]

(5) Annual Time Limit For Maintenance and Testing

The #1 Fire Pump and the Lime Kiln Auxiliary Drive Engine shall *each* be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations. [40 CFR §63.6640(f)]

(6) Recordkeeping Requirements

Woodland Pulp shall keep records that include maintenance conducted on each engine and the hours of operation of each engine recorded based on the non-resettable hour meter. Documentation shall include the number of hours spent in emergency operation, including what classified the operation as emergency, and the number of hours spent in non-emergency operation. [40 CFR §63.6655(e) and (f)]

3. Emission Limits

The BACT/BPT emission limits for the #1 Fire Pump, the #2 Fire Pump, and the Lime Kiln Auxiliary Drive Engine are based on the following:

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Source of Emission Factor</u>
PM, PM ₁₀	- 0.31 lb/MMBtu	AP-42 Table 3.3-1 (10/96)
SO ₂	- 0.0015 lb/MMBtu	combustion of diesel fuel with a sulfur content not to exceed 15 ppm (0.0015% by weight)
NO _x	- 4.41 lb/MMBtu	
CO	- 0.95 lb/MMBtu	AP-42, Table 3.3-1 (10/96)
VOC	- 0.36 lb/MMBtu	
Visible Emissions	N.A.	06-096 CMR 101, Section 2(B)(1)(d)

The BACT/BPT emission limits for the engines are the following:

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM₁₀ (lb/hr)</u>	<u>SO₂ (lb/hr)</u>	<u>NO_x (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
#1 Fire Pump 1.7 MMBtu/hr, diesel	0.53	0.53	0.003	7.50	1.62	0.61
#2 Fire Pump 2.9 MMBtu/hr, diesel	0.90	0.90	0.004	12.79	2.76	1.04

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Lime Kiln Auxiliary Drive Engine 0.32 MMBtu/hr, diesel	0.10	0.10	negligible	1.41	0.30	0.16

Visible emissions from each of the emergency engines shall not exceed 20% opacity on a six-minute block average, except for no more than two six-minute block averages in a three-hour period.

4. Emission Limit Compliance Methods

Compliance with the emission limits associated with the three emergency units shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

5. Periodic Monitoring

For the #1 Fire Pump, the #2 Fire Pump, and the Lime Kiln Auxiliary Drive Engine, Woodland Pulp shall periodically monitor and record the information indicated in the following table.

<u>Information</u>	<u>Units of Measure</u>	<u>Monitoring Tool/Method</u>	<u>Frequency</u>
Fuel oil sulfur content	Percent, by weight	Fuel receipts from supplier	As fuel is purchased, documented semi-annually
Operating time	Hours	Hour Meter	Recorded monthly and totaled at the end of every calendar year
Reason for Operation	N/A	Logbook or similar documentation	As it occurs

6. Parameter Monitors

There are no Parameter Monitors required for the #1 Fire Pump, the #2 Fire Pump, or the Lime Kiln Auxiliary Drive Engine.

7. CEMS and COMS

There are no CEMS or COMS required for the #1 Fire Pump, the #2 Fire Pump, or the Lime Kiln Auxiliary Drive Engine.

C. Facility Annual Emissions

1. Total Annual Emissions

Woodland Pulp shall be restricted to the following annual emissions, based on a 12-month rolling total.

Total Licensed Annual Emissions for the Facility^a
Tons/year
 (used to calculate the annual license fee^b)

	PM	PM₁₀	SO₂	NO_x	CO	VOC	TRS
Tissue Machines	--	--	0.6	39.6	43.6	--	--
Tissue Machines and No. 9 Power Boiler Combined	213.6	213.6	--	--	--	59.5	--
No. 9 Power Boiler	--	--	676	780	5008	--	--
#3 Recovery Boiler	189	189	1567	601	983	176	--
Smelt Dissolving Tank	50	50	--	--	--	--	13.6
Lime Kiln	87	87	35	175	1750	--	--
Package Boiler	56	56	9.9	5.6	1.4	0.1	--
NCG Incinerator	8.4	8.4	12.7	39.6	2.8	0.2	--
TOTALS	604.0	604.0	2301.2	1178.0^c	7788.8	235.8	13.6

- a. Emissions limits in the table do not include insignificant activities and process units (e.g. the woodyard) with no licensed emission limits, and do not include emergency engines whose possible emissions provide little or no noticeable contribution to the totals represented in this table.
- b. PM₁₀, CO, and TRS are not used in the calculation of the annual fee but are included in this table for completeness.
- c. Note that the total NO_x limit for the mill is less than total allowable emissions from individual units. Woodland Pulp may emit up to each required limit for any one individual unit, provided that the total of all units does not exceed the mill wide total of 1178.0 ton/year on a 12-month rolling total basis. See License A-215-70-I-R/A, Condition (17), issued November 18, 2011.

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans*, 40 CFR Part 52, Subpart A, §52.21 *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following

gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

Based on the facility's fuel use limits; the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*; 40 CFR Part 98; and the global warming potentials contained in 40 CFR Part 98; Woodland Pulp is above the major source threshold of 100,000 tons of CO₂e per year.

III. AMBIENT AIR QUALITY ANALYSIS

Woodland Pulp 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 license A-215-70-AC-A, issued October 6, 1999). An additional ambient air quality analysis is not required for this Part 70 Minor License Modification.

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 Minor License Modification (Amendment #2), A-215-70-L-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-215-70-I-R/A and license amendment A-215-70-K-A, and the following conditions.

Federally enforceable conditions in this Part 70 license amendment 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.

Severability. The invalidity or unenforceability of any provision of this License 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 is a new Specific Condition.

(49) Emergency Engines

A. Allowable Operation and Fuels

1. The #1 Fire Pump, the #2 Fire Pump, and the Lime Kiln Auxiliary Drive Engine are licensed to fire distillate fuel. [06-096 CMR 140, BPT]
2. The distillate fuel sulfur content for the #1 Fire Pump, the #2 Fire Pump, and the Lime Kiln Auxiliary Drive Engine shall be limited to 0.0015% sulfur by weight. [06-096 CMR 140, BPT]
3. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier documenting the type of fuel delivered and its sulfur content. [06-096 CMR 140, BPT]

B. Emissions shall not exceed the following limits [06-096 CMR 140, BPT]:

Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
#1 Fire Pump 1.7 MMBtu/hr, diesel	0.53	0.53	0.003	7.50	1.62	0.61
#2 Fire Pump 2.9 MMBtu/hr, diesel	0.90	0.90	0.004	12.79	2.76	1.04
Lime Kiln Auxiliary Drive Engine 0.32 MMBtu/hr, diesel	0.10	0.10	negligible	1.41	0.30	0.16

C. Visible Emissions

Visible emissions from each of the emergency engines shall not exceed 20% opacity on a six-minute block average, except for no more than two six-minute block averages in a three-hour period. [06-096 CMR 101]

D. Compliance with the emission limits associated with the #1 Fire Pump, the #2 Fire Pump, and the Lime Kiln Auxiliary Drive Engine shall be demonstrated in accordance with the appropriate test methods upon request of the Department. [06-096 CMR 140, BPT]

E. #2 Fire Pump: 40 CFR Part 60, Subpart III Requirements

1. Emission Standards Compliance Documentation

The #2 Fire Pump is subject to applicable emission standards identified in Table 4 to Subpart III of 40 CFR Part 60. [40 CFR §60.4205 (c)]

Woodland Pulp shall demonstrate compliance through maintenance of records of engine manufacturer data indicating compliance with the applicable standards. [40 CFR §60.4211 (b)(3)]

2. Ultra-Low Sulfur Diesel Requirement

The distillate fuel fired in the #2 Fire Pump shall not exceed 15 ppm sulfur (0.0015% sulfur), except that any existing fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. [40 CFR §60.4207(b)]

3. Non-Resettable Hour Meter Requirement

A non-resettable hour meter shall be installed and operated on the #2 Fire Pump. [40 CFR §60.4209(a)]

4. Operation and Maintenance Requirement

The #2 Fire Pump shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by facility that are approved by the engine manufacturer. Woodland Pulp may only change those emission-related settings that are permitted by the manufacturer. [40 CFR §60.4211(a)]

5. Annual Time Limit for Maintenance and Testing

The #2 Fire Pump shall be limited to 100 hours/year of operation for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations. [40 CFR §60.4211(f)]

6. Recordkeeping Requirements

Woodland Pulp shall keep records that include maintenance conducted on the #2 Fire Pump and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours spent in emergency operation, including what classified the situation as emergency, and the number of hours spent in non-emergency operation. [40 CFR §60.4214(b)]

F. **#1 Fire Pump and the Lime Kiln Auxiliary Drive Engine:** 40 CFR Part 63, Subpart ZZZZ Requirements

1. Operation and Maintenance Requirements

For the #1 Fire Pump and the Lime Kiln Auxiliary Drive Engine, Woodland Pulp shall comply with the following requirements [40 CFR §63.6603(a) and Table 2(d)]:

- a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
- b. Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and
- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The units shall be operated and maintained according to the manufacturer's emission-related written instructions or according to a maintenance plan developed by Woodland Pulp which provides to the extent practicable for the maintenance and operation of each engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]

2. Optional Oil Analysis Program

Woodland Pulp has the option of utilizing an oil analysis program which complies with the requirements of 40 CFR §63.6625(i) in order to extend the specified oil change requirement. If this option is used, Woodland Pulp shall keep records of the parameters that are analyzed as part of the program, the results of each analysis, and the oil changes for each engine. The analysis program must be part of the maintenance plan for each engine. [40 CFR §63.6625(i)]

3. Non-Resettable Hour Meter Requirement

A non-resettable hour meter shall be installed and operated on the #1 Fire Pump and the Lime Kiln Auxiliary Drive Engine. [40 CFR §63.6625(f)]

4. Startup Idle and Startup Time Minimization Requirements

During periods of startup of the #1 Fire Pump or the Lime Kiln Auxiliary Drive Engine, the facility must minimize each engine's time spent at idle and minimize each engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR §63.6625(h) & 40 CFR Part 63, Subpart ZZZZ Table 2d]

5. Annual Time Limit For Maintenance and Testing

The #1 Fire Pump and the Lime Kiln Auxiliary Drive Engine shall each be limited to 100 hours/year for maintenance checks and readiness testing.

Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations. [40 CFR §63.6640(f)]

6. Recordkeeping Requirements

Woodland Pulp shall keep records that include maintenance conducted on each engine and the hours of operation of each engine recorded based on the non-resettable hour meter. Documentation shall include the number of hours spent in emergency operation, including what classified the operation as emergency, and the number of hours spent in non-emergency operation. [40 CFR §63.6655(e) and (f)]

G. Periodic Monitoring

For the #1 Fire Pump, the #2 Fire Pump, and the Lime Kiln Auxiliary Drive Engine, Woodland Pulp shall periodically monitor and record the information indicated in the following table.

<u>Information</u>	<u>Units of Measure</u>	<u>Monitoring Tool/Method</u>	<u>Frequency</u>
Fuel Oil Sulfur Content	Percent, by weight	Fuel receipts from supplier	As fuel is purchased, documented semi-annually
Operating Time	Hours	Hour Meter	Recorded monthly and totaled at the end of every calendar year
Reason for Operation	N/A	Logbook or similar documentation	As it occurs

DONE AND DATED IN AUGUSTA, MAINE THIS 17 DAY OF September, 2014.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Maureen Allen Robert Case for
PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-215-70-I-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 3, 2014

Date of application acceptance: March 4, 2014

Date filed with the Board of Environmental Protection:

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

