



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

AVERY T. DAY
ACTING COMMISSIONER

**Woodland Pulp LLC
Washington County
Baileyville, Maine
A-215-70-N-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #4**

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
LICENSE TYPE	Part 70 Administrative Revision
NAICS CODES	32211
NATURE OF BUSINESS	Pulp Production
FACILITY LOCATION	144 Main Street, Baileyville, Maine

Woodland Pulp LLC (Woodland Pulp) has requested an amendment to their Part 70 license to extend the timeline to complete particulate matter (PM) emissions testing on the Lime Kiln.

B. 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. The requested revision to extend the date for completion of particulate matter emissions testing on the Lime Kiln corresponds to 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. ADMINISTRATIVE REVISION DESCRIPTION

C. Description of Requested Change

Woodland Pulp has requested a revision to the facility's air emission license to extend the PM emissions test completion due date to July 2016. Under the authority of 06-096 CMR 140, BPT, Specific Condition (37) C of Air Emission License A-215-70-I-R/A (November 18, 2011) requires Woodland Pulp to conduct PM and NO_x stack emission testing on the Lime Kiln every five calendar years. Although NO_x testing was conducted in 2011 and therefore not yet due, the most recent PM testing on the Lime Kiln was conducted in November of 2010. Woodland Pulp has requested an extension of the test completion due date to July 2016, when the facility plans to complete required Boiler MACT testing on the #9 Power Boiler.

Lime Kiln PM testing results from November 2010 and from the compliance test previous to 2010 show PM emission rates well below limitations at a fraction of the licensed limit. There is no data which indicates that the extension of the compliance testing due date would cause or contribute to any increase in emissions.

B. Best Practical Treatment (BPT)

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).

BPT was established in Air Emission License A-215-70-I-R/A (November 18, 2011). A BPT analysis is not required for this requested license change, because no modifications to the facility will be made and no increases in emissions will result.

C. Determination

The Department hereby grants the request to extend the due date for PM emissions testing from the Lime Kiln from the end of calendar year 2015 to July 31, 2016.

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-215-70-N-A pursuant to 06-096 CMR 140 and subject to the specific conditions below.

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 shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

SPECIFIC CONDITIONS

Specific Condition (37) C of Air Emission License A-215-70-I-R/A shall be replaced with the following:

(14) **Stack Testing** [06-096 CMR 140, BPT]

Woodland Pulp shall conduct stack testing in accordance with each of the following:

- C. Conduct PM and NO_x stack emissions testing on the Lime Kiln every five calendar years. This requirement shall include the testing due date extension for PM testing on the Lime Kiln, normally to be conducted during calendar year 2015, to be completed on or before July 31, 2016. The subsequent periodic PM stack emissions testing on the Lime Kiln following the 2016 test shall resume the testing cycle of at least once every five calendar years.

DONE AND DATED IN AUGUSTA, MAINE THIS 29 DAY OF December, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Maec Allen Robert Core for
AVERY T. DAY, ACTING 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: December 23, 2015

Date of application acceptance: December 23, 2015

Date filed with the Board of Environmental Protection:

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

