



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

AVERY T. DAY
ACTING COMMISSIONER

**Woodland Pulp LLC
Washington County
Baileyville, Maine
A-215-77-10-M**

**Departmental
Findings of Fact and Order
New Source Review
NSR #10**

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	Woodland Pulp LLC
LICENSE TYPE	06-096 CMR 115, Minor Revision
NAICS CODES	32211
NATURE OF BUSINESS	Pulp Production
FACILITY LOCATION	144 Main Street, Baileyville, Maine

B. Amendment Description

Woodland Pulp LLC (Woodland Pulp) has requested a New Source Review (NSR) license to authorize the addition of specification waste oil as a licensed fuel in the facility's Lime Kiln.

C. Emission Equipment

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

<u>Equipment</u>	<u>Capacity (MMBtu/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Year of Manufacture/ Installation</u>
Lime Kiln	75 MMBtu/hr (max. fuel firing)	#6 fuel oil, Specification waste oil ¹ , Propane, and Natural gas	1965
	440 tons/day calcium oxide/lime/CaO (nominal capacity)		

¹ Added in this NSR license

D. Application Classification

The application submitted by Woodland Pulp does not violate any applicable federal or state requirements, does not reduce monitoring, reporting, testing, or record keeping, and does not seek to modify a Best Available Control Technology (BACT) analysis.

The proposed revision will not change the facility's emission limits. Therefore, this NSR license is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 Code of Maine Rules (CMR) 115 (as amended). The procedures found in 06-096 CMR 115 (as amended) can be utilized to process this application since the proposed revision is not prohibited by the facility's Part 70 air emission license. An application to incorporate the requirements of this NSR license into the facility's 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. Lime Kiln

The Lime Kiln was constructed in 1965 with a nominal heat input capacity of 75 MMBtu/hour and is licensed to fire natural gas, propane, or #6 fuel oil. The Lime Kiln has a nominal production capacity of 440 ton/day of lime (calcium oxide, CaO). Emissions from the Lime Kiln are controlled using a fixed-throat wet venturi scrubber and a Ceilcote cross-flow scrubber. The Lime Kiln is equipped to continuously monitor and record venturi scrubber pressure drop, scrubber media flow rate, O₂, and TRS.

Woodland Pulp has requested the inclusion of specification waste oil as a licensed fuel in the Lime Kiln. 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. No modifications to the Lime Kiln or the corresponding control equipment are needed to accommodate the use of specification waste oil.

Licensed emission limits for the Lime Kiln shall not change as a result of the addition of this fuel.

Woodland Pulp shall maintain records of the fuel analyses 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 both monthly and on a 12-month rolling total basis.

C. 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 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 to incorporate the terms and conditions of the NSR license within one year of commencing the proposed operations, as provided in 40 CFR Part 70.5.

D. Annual Emissions

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

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. An additional ambient air quality analysis is not required for this NSR license.

ORDER

The Department hereby grants New Source Review Air Emission License A-215-77-10-M pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the specific conditions below.

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,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

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 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) Lime Kiln

- A. Woodland Pulp is licensed to fire natural gas, propane, #6 fuel oil, 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-215-70-I-R/A (November 18, 2011), subsequently issued Part 70 license amendments, and NSR licenses issued pertaining to the facility's Lime Kiln.
- B. The waste oil fired in the Lime Kiln 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]
- C. Woodland Pulp shall maintain records of the quantity of specification waste oil combusted in the Lime Kiln both monthly and on a 12-month rolling total basis. [06-096 CMR 115, BACT/BPT]

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Washington County
Baileyville, Maine
A-215-77-10-M

5

Departmental
Findings of Fact and Order
New Source Review
NSR #10

- (2) Woodland Pulp shall submit an application to incorporate this NSR license into the 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 *22* DAY OF *September*, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Marc Allen Robert Cove 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.

