



DEPARTMENT ORDER

**Twin Rivers Paper Company LLC
Aroostook County
Madawaska, Maine
A-263-70-E-R/A**

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

FINDINGS OF FACT

After review of the Part 70 License renewal and amendment applications, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Twin Rivers Paper Company LLC (Twin Rivers)
LICENSE TYPE	Part 70 License Renewal and Part 70 Minor License Modification
NAICS CODES	322121 (Paper (except Newsprint) Mills)
NATURE OF BUSINESS	Paper Mill
FACILITY LOCATION	82 Bridge Avenue, Madawaska, Maine 04756

Twin Rivers Paper Company LLC (Twin Rivers) is an integrated specialty paper company that manufactures packaging, label, and publishing products from pulp piped from the company's Edmundston, New Brunswick pulp mill.

Twin Rivers has the potential to emit more than 100 tons per year (TPY) of sulfur dioxide (SO₂) and more than 50 TPY of volatile organic compounds (VOC); therefore, the source is a major source for criteria pollutants. Twin Rivers does not have the potential to emit 10 TPY or more of a single hazardous air pollutant (HAP) or 25 TPY or more of combined HAP; therefore, the source is an area source for HAP.

B. Emission Equipment

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

Fuel Burning Equipment

<u>Equipment</u>	<u>Max. Heat Input Capacity (MMBtu/hr)</u>	<u>Max. Firing Rate</u>	<u>Fuel Type, % sulfur</u>	<u>Mfr. Date</u>	<u>Install. Date</u>	<u>Stack #</u>
Boiler #6	240	1,600 gal/hr	#6 Fuel oil, 0.7% Specification waste oil Distillate fuel, 0.5% (startup)	1949	1949	2
Propane-fired Dryers (PD) #11*	3.03	1,180 scf/hr	Propane, negl.	1994	1994	Fugitive
PD #12 and #13*	6.2 (each)	2,395 scf/hr (each)		1994	1994	
PD #1, #2, #3, and #4**	5.0 (each)	2,000 scf/hr (each)		1966	1966	
PD #5 and #6**	7.0 (each)	2,800 scf/hr (each)		1996	1996	

*Associated with Paper Machine #7 and PM #7 Online Coater

**Associated with C-2 Off Machine Coater

Generator and Fire Pumps

<u>Equipment</u>	<u>Max. Heat Input Capacity (MMBtu/hr)</u>	<u>Max. Firing Rate (gal/hr)</u>	<u>Output (HP)</u>	<u>Fuel Type, % sulfur</u>	<u>Mfr. Date</u>	<u>Install. Date</u>
Diesel Fire Pump #1 Entity No. P1300	2.2	16.1	350	Distillate Fuel, 0.05%	1971	1972
Diesel Fire Pump #2 Entity No. P1326	1.8	13.1	290		1971	1972
Diesel Generator Entity No. ME61	0.6	4.4	86		1989	1990

Process Equipment

<u>Equipment</u>	<u>Max. Production Rate/Loading Rate/Capacity*</u>	<u>Pollution Control Equipment</u>	<u>Install. Date</u>
TK13854 (starch silo)	7,500 lb/hr	Baghouse	2013
TK13855 (starch silo)	1,200 lb/hr	Baghouse	2016
TK13856 (talc silo)	4,500 lb/hr	Baghouse	2016
Parts Washers (20)	Between 20 and 30 gallons, each	---	Pre-1997
Paper Machine #4 PM #4 Size Press	50,000 tons/year	---	1927
Paper Machine #5	76,000 tons/year	---	1928

<u>Equipment</u>	<u>Max. Production Rate/Loading Rate/Capacity*</u>	<u>Pollution Control Equipment</u>	<u>Install. Date</u>
Paper Machine #7 PM #7 Online Coater	70,000 tons/year	---	1960
Paper Machine #8	130,000 tons/year	---	1970
C-2 Off Machine Coater (aqueous)	80,000 tons/year	---	1966

*The process rate information is listed only for informational purposes; it is not intended as a license restriction.

Twin Rivers also has clay slurry storage tanks and associated positive displacement pumps that are considered insignificant activities per Appendix B, Section A, Item 25 of *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

Fuel Storage Tanks

<u>Equipment</u>	<u>Capacity (Gallons)</u>	<u>Year Installed</u>
Gasoline Storage Tank Entity No. TK1442	500	2003
Distillate Fuel Storage Tank Entity No. TK1422	4,000	Pre-1986
#6 Fuel Oil Storage Tank Entity No. TK1440	150,000	2001

The Gasoline Storage Tank and Distillate Fuel Storage Tank are considered insignificant activities per Appendix B of 06-096 C.M.R. ch. 140. Although considered an insignificant activity, the Gasoline Storage Tank is subject to requirements in *Gasoline Dispensing Facilities Vapor Control*, 06-096 C.M.R. ch. 118, and those requirements have been included in this air emission license. The #6 Fuel Oil Tank is not considered an insignificant activity, but is also not subject to any state or federal regulations, and thus will not be discussed further in this air emission license.

The following equipment has been rendered inoperable and/or removed from the facility; therefore, all requirements pertaining to this equipment have been removed from the license.

Equipment Removed

<u>Equipment</u>	<u>Production Rate/Capacity</u>	<u>Pollution Control Equipment</u>	<u>Install. Date</u>	<u>Year Removed/Rendered Inoperable</u>
Paper Machine #1	30,000 tons/year	---	1925	2010/2007
Paper Machine #2	33,000 tons/year	---	1925	2010/2007
Paper Machine #3 PM #3 Online Coater PD #14	33,830 tons/year	---	1927	2016

<u>Equipment</u>	<u>Production Rate/Capacity</u>	<u>Pollution Control Equipment</u>	<u>Install. Date</u>	<u>Year Removed/ Rendered Inoperable</u>
C-3 Off Machine Coater (aqueous) PD #7, PD #8, PD #9, PD #10, PD #15, and PD #16	80,000 tons/year	---	1979	2009
Paper Machine #6	74,000 tons/year	---	1928	2008
Clay Coating Unloading (blowers)	14 tons/hour	Baghouse	1966	2003
Starch Storage (Silos TK13851, TK13852, and TK13853)	10 tons/hour	Baghouse	1966	2013

Twin Rivers has additional insignificant activities which do not need to be listed in the emission equipment tables above. The list of insignificant activities can be found in Appendix B of 06-096 C.M.R. ch. 140.

C. Definitions

Distillate Fuel. For the purposes of this license, *distillate fuel* means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;
- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

D. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the issued date of this license.

The application for Twin Rivers is for the renewal of their existing Part 70 Air Emission License. Pursuant to Section 2(A) of *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 140, Twin Rivers has also requested incorporation into the Part 70 Air Emission License the relevant terms and conditions of the New Source Review (NSR) licenses issued to the facility pursuant to *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115, including A-263-77-1-A issued on January 27, 2017. Therefore, the license is a Part 70 License renewal with the incorporation of NSR requirements via a Part 70 Minor License Modification.

E. Facility Description

Twin Rivers owns and operates a paper mill in Madawaska, Maine. Most pulp is received from the Twin Rivers facility across the river from the Madawaska mill in Edmundston, New Brunswick, Canada. The pulp is conveyed by pipeline to Twin Rivers' Madawaska mill. Twin Rivers uses different mixtures of pulps and coatings to produce lightweight coated and uncoated packaging, label, and publishing products on four paper machines. Twin Rivers receives most of its steam from the facility in Edmundston, but also has a limited use backup boiler (Boiler #6) at its Madawaska facility.

Other industrial processes at the mill include starch loading and storage; a coating preparation area; a finishing, converting, and shipping area; a process wastewater treatment operation; and a solid waste landfill.

F. General Facility Requirements

Twin Rivers is subject to the following state and federal regulations listed below, in addition to the regulations listed for specific units as described further in this license.

CITATION	REQUIREMENT TITLE
06-096 C.M.R. ch. 101	Visible Emissions Regulation
06-096 C.M.R. ch. 102	Open Burning
06-096 C.M.R. ch. 103	Fuel Burning Equipment Particulate Emission Standard
06-096 C.M.R. ch. 105	General Process Source Particulate Emission Standard
06-096 C.M.R. ch. 106	Low Sulfur Fuel Regulation
06-096 C.M.R. ch. 109	Emergency Episode Regulations
06-096 C.M.R. ch. 110	Ambient Air Quality Standards
06-096 C.M.R. ch. 116	Prohibited Dispersion Techniques
06-096 C.M.R. ch. 130	Solvent Cleaners
06-096 C.M.R. ch. 137	Emission Statements
06-096 C.M.R. ch. 138	Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides
06-096 C.M.R. ch. 140	Part 70 Air Emission License Regulations
06-096 C.M.R. ch. 144	National Emission Standards for Hazardous Air Pollutants
40 C.F.R. Part 63, Subpart ZZZZ	National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 63, Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
40 C.F.R. Part 70	State Operating Permit Programs

Note: C.M.R. = Code of Maine Regulations
C.F.R. = Code of Federal Regulations

G. Units of Measurement

The following units of measurement are used in this license:

scf/hr	standard cubic feet per hour
gal/hr	gallons per hour
gal/scf	gallons per standard cubic foot
gal/yr	gallons per year
lb/hr	pounds per hour
lb/MMBtu	pounds per million British Thermal Units
MMBtu/hr	million British Thermal Units per hour
MMscf/yr	million standard cubic feet per year
tpy	tons per year

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 *Definitions Regulation*, 06-096 C.M.R. ch. 100. 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. NO_x RACT (Reasonably Available Control Technology)

Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides, 06-096 C.M.R. ch. 138 (NO_x RACT) is applicable to sources that have the potential to emit quantities of NO_x equal to or greater than 100 tons/year. Air Emission License A-263-71-B-R (issued June 9, 1998) and Amendments A-263-71-D-M (December 28, 1994) and A-263-71-E-A (April 16, 1996) originally addressed NO_x RACT requirements. Due to the promulgation of new federal regulations and changes in the facility's fuel limits and requirements, the facility's NO_x RACT requirements will be readdressed in this license in Section I. of this part.

C. VOC RACT (Reasonably Available Control Technology)

Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds, 06-096 C.M.R. ch. 134 (VOC RACT) is applicable to sources that have the potential to emit quantities of VOC equal to or greater than 40 tons/year. Twin Rivers does have the potential to emit quantities of VOC greater than 40 tons/year; however, certain parts of the facility, including Boiler #6, Paper Machines #4, #5, #7, and #8, and the on- and off-line dryers and coaters are exempt from this rule. With the exemptions mentioned above, the facility's potential to emit for VOC is less than 40 tons/year; therefore, Twin Rivers is not subject to VOC RACT. [06-096 C.M.R. ch. 134, §§ 1.C.(4) & 1.C.(7)]

D. Mandatory Greenhouse Gas (GHG) Reporting

Federal regulation *Mandatory Greenhouse Gas Reporting*, 40 C.F.R. Part 98, which contains GHG reporting and related monitoring and recordkeeping requirements, is applicable to the owners/operators of any facility which falls into any one of the following three categories, per *General Provisions, Who must report?*, 40 C.F.R. § 98.2.

- (a)(1) A facility that contains any source category that is listed in Table A-3 of this subpart in any calendar year starting in 2010.
- (a)(2) A facility that contains any source category that is listed in Table A-4 of this subpart and that emits 25,000 metric tons CO₂e or more per year in combined emissions from stationary fuel combustion units, miscellaneous uses of carbonate, and all applicable source categories that are listed in Table A-3 and Table A-4 of this subpart.
- (a)(3) A facility that in any calendar year starting in 2010 meets all three of the conditions listed in this paragraph (a)(3). For these facilities, the annual GHG report must cover emissions from stationary fuel combustion sources only.
 - (i) The facility does not meet the requirements of either paragraph (a)(1) or (a)(2) of this section.
 - (ii) The aggregate maximum rated heat input capacity of the stationary fuel combustion units at the facility is 30 MMBtu/hour or greater.
 - (iii) The facility emits 25,000 metric tons CO₂e or more per year in combined emissions from all stationary fuel combustion sources.

If Twin Rivers exceeds the use of 2,114,964 gallons of #6 fuel oil in a calendar year, the facility will meet all three conditions listed in paragraph (a)(3) above and will be subject to the recordkeeping and reporting requirements of 40 C.F.R. Part 98.

E. Compliance Assurance Monitoring (CAM)

Compliance Assurance Monitoring, 40 C.F.R. Part 64 is applicable to units at major sources if the unit has emission limits, a control device to meet the limits, and pre-control emissions greater than 100 tons/year for any pollutant. This regulation's 40 C.F.R. § 64.2(b)(1)(vi) specifies the exemption from specific CAM requirements for any emission units subject to emission limitations or standards for which a Part 70 air emission license specifies a continuous compliance determination method. Furthermore, 40 C.F.R. Part 64 § 64.2(b)(1)(i) specifies the exemption from specific CAM requirements for any emission units subject to emission limitations or standards in a NSPS or NESHAP regulation proposed by the Administrator after November 15, 1990. [40 C.F.R. § 64.2(b)]

The following table lists all the specific pollutants for each unit meeting CAM applicability criteria and the determination of the applicability of CAM requirements for each.

40 C.F.R. Part 64 Applicability Table

Units	Eligible Pollutant	CAM Required	Reason CAM is Not Applicable	Regulatory Authority
Boiler #6	SO ₂	No	No SO ₂ -specific control device	40 C.F.R. § 64.2(a)
Paper Coating and Solvent Degreasing	VOC	No	No VOC-specific control device	40 C.F.R. § 64.2(a)

Therefore, there are no units at this facility subject to CAM requirements.

F. Fuel Sulfur Content Requirements

Twin Rivers is licensed to fire distillate fuel which, by definition, has a sulfur content of 0.5% or less by weight. Per 38 M.R.S. § 603-A(2)(A)(3), as of July 1, 2018, no person shall import, distribute, or offer for sale any distillate fuel with a sulfur content greater than 0.0015% by weight (15 ppm). Therefore, beginning July 1, 2018, the distillate fuel purchased or otherwise obtained for use at this facility shall not exceed 0.0015% by weight (15 ppm).

Twin Rivers is licensed to fire residual fuel (includes #6 fuel oil). The sulfur content of residual fuel is currently limited to 0.7% by weight per 06-096 C.M.R. ch. 115, BPT. Per 38 M.R.S. § 603-A(2)(A)(1) and (2), as of July 1, 2018, no person shall import, distribute, or offer for sale any residual fuel oil with a sulfur content greater than 0.5% by weight. Therefore, beginning July 1, 2018, the residual fuel purchased or otherwise obtained for use at this facility shall not exceed 0.5% by weight.

G. HAP Status

In the past, Twin Rivers had sent in an initial notification for the following MACT subparts applicable to major HAP sources:

- *National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Pulp and Paper Industry*, 40 C.F.R. Part 63, Subpart S (submitted April 12, 1999);
- *NESHAP: Paper and Other Web Coating*, 40 C.F.R. Part 63, Subpart JJJJ (submitted November 24, 2004); and
- *NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, 40 C.F.R. Part 63, Subpart DDDDD (submitted March 4, 2005)

As clearly articulated in the notification Twin Rivers (then Fraser Papers Inc.) sent to Susan Lancey at EPA on April 12, 1999, the facility was unsure of the applicability of *NESHAP from the Pulp and Paper Industry*, 40 C.F.R. Part 63, Subpart S and of their status as an area source and erred on the side of caution. The facility continued to act out of caution with their Initial Notification submittals for *NESHAP: Paper and other Web Coating*, 40 C.F.R. Part 63, Subpart JJJJ (May 14, 2003) and *NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, 40 C.F.R. Part 63, Subpart DDDDD (March 4, 2005).

After reviewing the facility's HAP emissions inventory submittals for 2011 and 2014 and historical HAP emissions provided by the facility, the Department has determined that Twin Rivers is an area source of HAP and not a major source of HAP. This license includes facility-wide HAP limits which will ensure the facility's area source status moving forward.

H. Facility-wide HAP Limit

In order for Twin Rivers to remain an area source of HAP, Twin Rivers shall limit facility-wide HAP emissions to no more than 9.9 tons/year for a single HAP and 24.9 tons/year for total HAPs, on a 12-month rolling total basis. In order to demonstrate compliance with these limits, Twin Rivers shall maintain and make available upon request a current list of all HAP-containing materials in use at the facility. This list shall provide the necessary data to determine compliance, including:

- Names and types of all HAP-containing materials in use;
- Identification of each HAP in these materials;
- Percent HAP by weight or pounds of HAP per gallon for each material;
- The quantity of HAP-containing materials purchased on a monthly basis; and
- The quantity of HAP-containing materials shipped offsite on a monthly basis.

All HAP in these materials is assumed to be released into the atmosphere. Monthly HAP totals shall be determined using the following equation:

$$\text{Monthly HAP Emissions} = \sum_{i=1}^n (\text{A} \times \text{HAP content}) - (\text{B} \times \text{HAP content})$$

Where:

- i = each HAP containing material used at the facility during the month;
- n = the number of HAP containing materials used at the facility during the month;
- A = monthly facility usage of HAP containing materials; and
- B = Quantities of HAP containing materials shipped offsite

Twin Rivers may elect not to account for the material shipped offsite, which will result in a conservatively high estimate of HAP emissions.

The monthly totals of HAPs shall be used to calculate and track HAP emissions on a 12-month rolling total basis. Twin Rivers shall make these records available to the Department upon request.

I. Boiler #6

Boiler #6 is a Combustion Engineering Model CE-VOX-3676 boiler installed in 1949. Boiler #6 was designed with a heat input capacity of 240 MMBtu/hr and combusts #6 fuel oil with a maximum sulfur content of 0.7% by weight and specification waste oil (as defined in Section (4.) (B.) of *Waste Oil Management Rules*, 06-096 C.M.R. ch. 860) generated onsite, and distillate fuel for startup of the boiler. Boiler #6 is operated as a backup boiler used to provide steam to the facility when steam from Twin Rivers' Edmundston, New Brunswick facility is unavailable.

Emissions from Boiler #6 exit through Stack #2, which has an inside diameter of 89.8 inches and above ground level (AGL) height of 199 feet.

1. New Source Performance Standards (NSPS)

Due to its year of manufacture, Boiler #6 is not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Db for units greater than 100 MMBtu/hr manufactured after June 19, 1984. [40 C.F.R. § 60.40b(a)]

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

Boiler #6 is subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ. The unit is considered an existing oil boiler rated more than 10 MMBtu/hr. The applicable requirements of 40 C.F.R. Part 63, Subpart JJJJJ for Boiler #6 are the following:

a. Compliance Dates, Notifications, and Work Practice Requirements

(1) Initial Notification of Compliance

Twin Rivers submitted their Initial Notification to EPA on September 1, 2017. [40 C.F.R. § 63.11225(a)(2)]

(2) Boiler Tune-Up Program

(i) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]

(ii) Each tune-up shall be conducted every two years. [40 C.F.R. § 63.11223(a) and Table 2]

(iii) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]
2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]
3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]

5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]
6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. [40 C.F.R. § 63.11223(b)(7)]

(iv) Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:

1. The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
2. A description of any corrective actions taken as part of the tune-up of the boiler; and
3. The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

(v) After conducting the initial boiler tune-up, Twin Rivers submitted their Notification of Compliance Status to EPA on July 28, 2017. [40 C.F.R. §§ 63.11225(a)(4) and 63.11214(b)]

(3) Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in 40 C.F.R. §§ 63.11225(b)(1) and (2), including the following [40 C.F.R. § 63.11225(b)]:

- (i) Company name and address;
- (ii) A statement of whether the source has complied with all the relevant requirements of this Subpart;
- (iii) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;

(iv) The following certifications, as applicable:

1. "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
2. "No secondary materials that are solid waste were combusted in any affected unit."
3. "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

(4) Energy Assessment

Boiler #6 is subject to the energy assessment requirement as follows:

- (i) A one-time energy assessment was required to be performed by a qualified energy assessor on the applicable boilers. Twin Rivers conducted their one-time energy assessment on November 21, 2016. [40 C.F.R. § 63.11196(a)(3)]
- (ii) A Notification of Compliance Status was required to be submitted to EPA after completion of the one-time energy assessment. Twin Rivers submitted their Notification of Compliance Status to EPA on July 28, 2017. [40 C.F.R. § 63.11225(a)(4) and 40 C.F.R. § 63.11214(c)]

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJ including the following [40 C.F.R. § 63.11225(c)]:

- (1) Copies of notifications and reports with supporting compliance documentation;
- (2) Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
- (3) Records of the occurrence and duration of each malfunction of each applicable boiler; and
- (4) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

3. Control Equipment

There is no control equipment required for Boiler #6.

4. NO_x RACT Requirements

In previous licenses, Boiler #6 was determined to be meeting NO_x RACT by limiting boiler operation to less than 30% of its annual capacity factor, by meeting a NO_x emission limit of 0.40 lb/MMBtu, and by limiting the NO_x emissions from Boiler #6 to less than 20 tons per month and 100 tons per year on a 12-month rolling total basis. Boiler #6 was determined to be meeting the 0.40 lb/MMBtu NO_x limit by stack testing and was determined to be meeting the 100 tons/year NO_x limit by firing less than 3,378,000 gallons of #6 fuel oil per year. NO_x RACT for Boiler #6 included additional requirements of NO_x stack testing and completing a tune-up of the unit if Twin Rivers fired over 2,800,000 gallons of #6 fuel oil in Boiler #6 in any given calendar year.

As part of this renewal and amendment, Twin Rivers has accepted a fuel limit of 2,800,000 gallons of #6 fuel oil on a 12-month rolling total basis, which is equal to an annual capacity factor of 20%; therefore, since Twin Rivers is limited to 2,800,000 gallons of #6 fuel oil on a 12-month rolling total basis they will no longer be capable of triggering the additional NO_x RACT stack testing and tune-up requirements that were necessary should they have exceeded the 2,800,000-gallon threshold. Note: tune-ups required per 40 C.F.R. Part 63, Subpart JJJJJ are still required in accordance with the requirements of that subpart.

The updated NO_x RACT requirements for Boiler #6 shall be limiting boiler operation to less than 20% of its annual capacity factor, meeting a NO_x emission limit of 0.40 lb/MMBtu, and limiting NO_x emissions from Boiler #6 to less than 20 tons per month (equivalent to 667,000 gallons/month of #6 fuel oil) and 100 tons per year on a 12-month rolling total basis. Compliance with these limits shall be demonstrated by fuel use records kept on a monthly and 12-month rolling total basis.

5. Emission Limits

For Boiler #6, a listing of potentially applicable emission standards, the origin and authority of the standards, and the applicable emission limits can be found below. The VOC lb/hr emission limit has been updated to reflect the most recent VOC emission factor of 0.76 lb/1,000 gallon in EPA's publication *AP-42: Compilation of Air Emission Factors*.

Pollutant	Applicable Emission Standard(s)	Origin and Authority	Licensed Emission Limit(s)
PM	0.20 lb/MMBtu	06-096 C.M.R. ch. 103, § 2.A.(1)	0.20 lb/MMBtu
	48.0 lb/hr	A-263-71-B-R (6/9/98), BPT	48.0 lb/hr
PM ₁₀	0.20 lb/MMBtu	A-263-71-B-R (6/9/98), BPT	0.20 lb/MMBtu
	48.0 lb/hr	A-263-71-B-R (6/9/98), BPT	48.0 lb/hr
SO ₂	0.74 lb/MMBtu (based on 0.7% S limit, by weight)	A-263-71-B-R (6/9/98), BPT	0.7% sulfur content limit, by weight
	175.8 lb/hr (based on 0.7% S limit, by weight)	A-263-71-B-R (6/9/98), BPT	175.8 lb/hr
NO _x	0.40 lb/MMBtu	A-263-71-E-A (4/16/96), NO _x RACT	0.40 lb/MMBtu
	96.0 lb/hr	A-263-71-B-R (6/9/98), BPT	96.0 lb/hr
CO	8.0 lb/hr	A-263-71-B-R (6/9/98), BPT	8.0 lb/hr
VOC	1.2 lb/hr	06-096 C.M.R. ch. 140, BPT	1.2 lb/hr
Visible Emissions	30% opacity on a six-minute block average basis, except for no more than two six-minute block averages in a three-hour period, during which time visible emissions shall not exceed 50% opacity.	06-096 C.M.R. ch. 140, BPT	30% opacity on a six-minute block average basis, except for no more than two six-minute block averages in a three-hour period, during which time visible emissions shall not exceed 50% opacity.

Table Notes:

% S = percent fuel sulfur content, by weight

6. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boiler #6 shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department. [06-096 C.M.R. ch. 140, BPT]

<u>Pollutant</u>	<u>Applicable Emission Limit</u>	<u>Compliance Method</u>	<u>Frequency</u>
PM	lb/MMBtu	40 C.F.R. Part 60, App. A, Method 5	As requested
	lb/hr		
PM ₁₀	lb/MMBtu	40 C.F.R. Part 60, App. A, Method 5 or EPA Test Method 201 or 201A	As requested
	lb/hr		
SO ₂	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO _x	lb/MMBtu	40 C.F.R. Part 60, App. A, Method 7	As requested
	lb/hr		
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested
VOC	lb/hr	40 C.F.R. Part 60, App. A, Method 25 or 25A	As requested
Visible Emissions	30% opacity on a six-minute block average basis, except for no more than two six-minute block averages in a three-hour period, during which time visible emissions shall not exceed 50% opacity.	40 C.F.R. Part 60, App. A, Method 9	As requested

7. Periodic Monitoring

Twin Rivers shall monitor and record values for Boiler #6 as indicated in the following table whenever the equipment is operating.

Boiler #6			
Monitored Values	Units of Measure	Monitoring Tool/Method	Frequency
#6 fuel oil use	Gallons	Tank fuel level marker/meter/gauge and calculations	Monthly and 12-month rolling total
#6 fuel oil sulfur content	Percent, by weight	Fuel receipts from supplier	As fuel is purchased

8. Parameter Monitors

There are no Parameter Monitors required for Boiler #6.

J. Diesel Fire Pumps #1 and #2 and Diesel Generator

Twin Rivers operates Diesel Generator as an emergency generator. Diesel Generator is a Cummins brand generator set, consisting of an engine and an electrical generator. Diesel Generator has an engine rated at 0.6 MMBtu/hr which fires distillate fuel at a rate of 4.4 gal/hr. Diesel Generator was manufactured in 1989 and installed at the facility in 1990.

Twin Rivers also operates two fire pumps, Diesel Fire Pump #1 and Diesel Fire Pump #2. Diesel Fire Pumps #1 and #2 have engines rated at 2.2 MMBtu/hr and 1.8 MMBtu/hr, respectively, which fire distillate fuel. Diesel Fire Pumps #1 and #2 were both manufactured in 1971 and installed in 1972.

1. New Source Performance Standards (NSPS)

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 C.F.R. Part 60, Subpart IIII is not applicable to Diesel Fire Pumps #1 and #2 and Diesel Generator since the units were ordered before July 11, 2005, and manufactured before April 1, 2006.

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

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 C.F.R. Part 63, Subpart ZZZZ is applicable to Diesel Fire Pumps #1 and #2 and Diesel Generator. The units are considered existing, emergency stationary reciprocating internal combustion engines (RICE) at an area HAP source and are not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo (*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 Engine Designation and Operating Criteria

Under Subpart ZZZZ, a stationary reciprocating internal combustion engine (RICE) is considered an **emergency** stationary RICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under Subpart ZZZZ, resulting in the engine being subject to requirements applicable to **non-emergency** engines.

(1) Emergency Situation Operation (Onsite)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an onsite disaster or equipment failure;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

- (i) An emergency engine 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; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance company associated with the engine. The owner or operator 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 more than 100 hours per calendar year.
- (ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

Diesel Fire Pumps #1 and #2 and Diesel Generator shall be limited to the usage outlined in 40 C.F.R. § 63.6640(f) and therefore may be classified as existing emergency stationary RICE as defined in 40 C.F.R. Part 63, Subpart ZZZZ. Failure to comply with all of the requirements listed in 40 C.F.R. § 63.6640(f) may cause these engines to not be considered emergency engines and therefore subject to all applicable requirements for non-emergency engines.

b. 40 C.F.R. Part 63, Subpart ZZZZ Requirements

(1) Operation and Maintenance Requirements

<u>Engine Type</u>	<u>Operating Limitations</u>
Compression ignition (distillate fuel) unit: Diesel Fire Pump #1 Diesel Fire Pump #2 Diesel Generator	- 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 engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or Twin Rivers shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

(2) Optional Oil Analysis Program

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

(3) Non-Resettable Hour Meter Requirement

A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 63.6625(f)]

(4) Startup Idle and Startup Time Minimization Requirements

During periods of startup the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) and 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(5) Annual Time Limit for Maintenance and Testing

As emergency engines, the units shall each be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards.

Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). [40 C.F.R. § 63.6640(f)]

(6) Recordkeeping

Twin Rivers shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, the number of hours each unit operated for non-emergency purposes, and the reason each engine was in operation during each time. [40 C.F.R. § 63.6655(f)]

3. Control Equipment

There is no control equipment required for Diesel Fire Pumps #1 and #2 or Diesel Generator.

4. Emission Limits

The emission limits for Diesel Fire Pumps #1 and #2 and Diesel Generator are based on the following:

- PM/PM₁₀ - 0.12 lb/MMBtu from A-263-70-C-R (1/20/2010), BPT
 - SO₂ - 0.05 lb/MMBtu based on combustion of distillate fuel with a maximum sulfur content not to exceed 0.05% sulfur by weight
 - NO_x - 4.41 lb/MMBtu from AP-42 dated 10/96
 - CO - 0.95 lb/MMBtu from AP-42 dated 10/96
 - VOC - 0.35 lb/MMBtu from AP-42 dated 10/96
 - Visible - 06-096 C.M.R. ch. 140, BPT
- Emissions

The emission limits for Diesel Fire Pumps #1 and #2 and Diesel Generator are the following [A-263-70-C-R (1/20/2010), BPT]:

Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Diesel Fire Pump #1	0.3	0.3	0.1	9.7	2.1	0.8
Diesel Fire Pump #2	0.2	0.2	0.1	7.9	1.7	0.6
Diesel Generator	0.1	0.1	0.1	2.6	0.6	0.2

Visible emissions from Diesel Fire Pumps #1 and #2 and Diesel Generator shall each not exceed 30% opacity on a six-minute block average basis.

5. Emission Limit Compliance Methods

Compliance with the emission limits associated with Diesel Fire Pumps #1 and #2 and Diesel Generator shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

6. Periodic Monitoring

Twin Rivers shall monitor and record values for Diesel Fire Pumps #1 and #2 and Diesel Generator as indicated in the following table.

Monitored Values	Units of Measure	Monitoring Tool/Method	Frequency
Fuel oil sulfur content	Percent, by weight	Fuel receipts from supplier	As fuel is purchased
Operating time	Hours	Hour Meter	Monthly and calendar year total recorded as they occur
Type of Operation (emergency, maintenance, etc.)	N/A	Recorded electronically or in logbook	As occurs

7. Parameter Monitors

There are no Parameter Monitors required for Diesel Fire Pumps #1 or #2 or Diesel Generator.

K. Paper Machines, Size Press, On- and Off-Line Coaters, and Propane-Fired Dryers

Twin Rivers is licensed to operate the following paper machines, size presses, coaters, and dryers:

Unit	Date of Installation	Control Equipment
Paper Machine #4 PM #4 Size Press	1927	N/A
Paper Machine #5	1928	N/A
Paper Machine #7 PM #7 Online Coater PD #11, #12, and #13	1960	N/A
Paper Machine #8	1970	N/A
C-2 Off Machine Coater PD #1, #2, #3, #4, #5, and #6	1966	N/A

1. Paper Machines, Size Press, and On and Off Machine Coaters

Twin Rivers operates four paper machines (Paper Machines #4, #5, #7, and #8) and one size press (PM #4 Size Press) for the production of paper, and two coaters (PM #7 Online Coater and C-2 Off Machine Coater) for the coating of paper. Twin Rivers shall run PM #7 Online Coater and C-2 Off Machine Coater with aqueous-based coatings only. The VOC content of the coatings shall remain below 2.9 lb VOC/gallon.

a. New Source Performance Standards (NSPS)

There are no NSPS requirements applicable to these units.

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

There are no emissions units at this facility subject to *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating*, 40 C.F.R. Part 63, Subpart JJJJ. This regulation is only applicable to major sources of HAP. As established in a previous section, Twin Rivers is an area source of HAP and is therefore not subject to this regulation.

c. *Paper Coating Regulation*, 06-096 C.M.R. ch. 123

Twin Rivers is not subject to *Control of Volatile Organic Compounds from Paper, Film and Foil Coating Operations*, 06-096 C.M.R. ch. 123. Size presses, on-machine coaters, and off machine coaters that use coatings with a VOC content less than 2.9 lb VOC/gallon are considered exempt from this regulation. [06-096 C.M.R. ch. 123, § 1.C.(1-2)]

To demonstrate that the facility is and will continue to not be subject to this regulation, Twin Rivers shall maintain the following records on site for all coatings used at the facility on a monthly and 12-month rolling total basis:

- Amount of VOC containing chemicals (in lb VOC/gallon, less water) in applied coatings;
- Volume (in gallons) of coating applied each month;
- Total VOCs emitted from coatings on a monthly and 12-month rolling total basis; and
- Certification stating all coatings used at the facility are below 2.9 lb VOC/gallon, excluding water and negligibly reactive VOC compounds.

For licensing fee purposes, total VOC emissions from all coatings used at the facility have been conservatively estimated at 130.0 TPY. Although this is not a limit, Twin Rivers shall maintain records of VOC emissions from these coatings as described above for emissions inventory purposes.

d. Control Equipment

There is no control equipment required for these units.

e. Visible Emissions

Visible emissions from Paper Machines #4, #5, #7, and #8, the Paper Machine #7 Online Coater, and the C-2 Off Machine Coater shall each not exceed 20% opacity on a six-minute block average basis. Compliance with this limit shall be demonstrated by conducting EPA Method 9 visible emissions tests on an as-requested basis. [06-096 C.M.R. ch. 101, § 2.B.3.d.]

f. Periodic Monitoring

Twin Rivers shall keep records of VOC emissions as described above on a monthly and 12-month rolling total basis.

g. Parameter Monitors

There are no parameter monitors required for this equipment.

2. Propane-Fired Dryers

Twin Rivers operates nine Propane-fired Dryers for drying paper and coatings. The Propane-fired Dryers range in size from 3.03 MMBtu/hr to 7.0 MMBtu/hr and exhaust through individual roof vents. The requirements for the Propane-fired Dryers are addressed in the following sections.

a. New Source Performance Standards (NSPS)

Due to the size of the units, the Propane-fired Dryers are not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr manufactured after June 9, 1989. [40 C.F.R. § 60.40c(a)]

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

The Propane-fired Dryers are not subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ. The units are considered process heaters, which are exempt from 40 C.F.R. Part 63, Subpart JJJJJ. [40 C.F.R. §§ 63.11193 and 63.11237]

c. Control Equipment

There is no control equipment required for the Propane-fired Dryers.

d. Emission Limits

The emission limits for the Propane-fired Dryers are based on the following emission factors and a conversion factor of 0.0278 gal/scf:

- PM/PM₁₀ – 0.05 lb/MMBtu based on 06-096 C.M.R. ch. 140, BPT
- SO₂ – 0.018 lb/1000 gal based on AP-42, Table 1.5-1, dated 7/08
- NO_x – 13 lb/1000 gal based on AP-42, Table 1.5-1, dated 7/08
- CO – 7.5 lb/1000 gal based on AP-42, Table 1.5-1, dated 7/08
- VOC – 1.0 lb/1000 gal based on AP-42, Table 1.5-1, dated 7/08
- Visible Emissions – 06-096 C.M.R. ch. 140, BPT

The emission limits for the Propane-fired Dryers are the following:

Unit	Pollutant	lb/MMBtu
Propane-fired Dryers #1-6 and #11-13 [each]	PM	0.05

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Propane-fired Dryers #1-4 [each]	0.25	0.25	0.01	0.72	0.41	0.06
Propane-fired Dryers #5-6 [each]	0.35	0.35	0.01	1.01	0.58	0.08
Propane-fired Dryer #11	0.15	0.15	0.01	0.44	0.25	0.03
Propane-fired Dryers #12-13 [each]	0.31	0.31	0.01	0.89	0.51	0.07

Visible emissions from each Propane-fired Dryer shall not exceed 10% opacity on a six-minute block average basis.

Twin Rivers shall be limited to 3,000,000 gal/yr of propane on a 12-month rolling total basis for Propane-fired Dryers #1-6 and #11-13, combined.

e. Emission Limit Compliance Methods

Compliance with the emission limits associated with the Propane-fired Dryers shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department.

Pollutant	Applicable Emission Limit	Compliance Method	Frequency
PM	lb/MMBtu lb/hr	40 C.F.R. Part 60, App. A, Method 5	As requested
PM ₁₀	lb/hr	40 C.F.R. Part 60, App. A, Method 5 or EPA Test Method 201 or 201A	As requested
SO ₂	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO _x	lb/hr	40 C.F.R. Part 60, App. A, Method 7	As requested
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested
VOC	lb/hr	40 C.F.R. Part 60, App. A, Method 25 or 25A	As requested
Visible Emissions	10% opacity on a six-minute block average basis	40 C.F.R. Part 60, App. A, Method 9	As requested

f. Periodic Monitoring

Twin Rivers shall monitor and record values for the Propane-fired Dryers in the following table.

Propane-Fired Dryers			
Monitored Value	Units of Measure	Monitoring Tool/Method	Frequency
Propane fuel use	gallons	Fuel receipts from supplier	Monthly and 12-month rolling total

g. Parameter Monitors

There are no parameter monitors required for the Propane-fired Dryers.

L. Storage Silos TK13854, TK13855, and TK13856 (Starch Unloading and Storage)

Twin Rivers is licensed to install and operate storage silos TK13854, TK13855, and TK13856. [A-263-77-1-A (1/27/2017), BACT] Storage silos TK13854 and TK13855 both store starch, and storage silo TK13856 stores talc. Storage silo TK13854 was installed in 2013 and has a production rate of 7,500 lbs/hr. Storage silos TK13855 and TK13856 were both installed in 2016 and have maximum loading rates of 1,200 lbs/hr and 4,500 lbs/hr, respectively. Particulate matter emissions from all three silos and their loading operations are controlled by baghouses.

Twin Rivers shall operate and maintain baghouses on storage silos TK13854, TK13855, and TK13856 to control particulate matter emissions generated during the loading and unloading of the storage silos. Visible emission from each storage silo shall not exceed 10% opacity on a six-minute block average basis. Corrective action shall be taken if emissions exceed 5% opacity on a six-minute block average basis. In order to document maintenance of the baghouses, Twin Rivers shall keep a maintenance log recording the date of all bag failures and routine baghouse inspections and maintenance. [A-263-77-1-A (1/27/2017), BACT]

M. Parts Washers

Twin Rivers uses 20 parts washers throughout the facility. The parts washers were manufactured and installed prior to 1997 and have design capacities of between 20 and 30 gallons, each. Based on the solvent used, the parts washers are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130.

Periodic monitoring for the parts washers shall consist of recordkeeping including records of solvent added and removed.

N. Gasoline Storage Tank

The Gasoline Storage Tank has a capacity of 500 gallons and is not subject to *NESHAP for Source Category: Gasoline Dispensing Facilities*, 40 C.F.R. Part 63, Subpart CCCCCC because the throughput of the tank is and has been below the initial applicability threshold of 100,000 gallons per month.

Although the Gasoline Storage Tank has always had a throughput below the 10,000 gallons per month applicability threshold included in 06-096 C.M.R. ch. 118, and thus has not been subject to the vapor system, testing, and training and public education requirements of 06-096 C.M.R. ch. 118, the Gasoline Storage Tank is still subject to the following two requirements of that regulation:

1. The fill pipe shall extend within six inches of the bottom of the gasoline storage tank. [06-096 C.M.R. ch. 118, § 4.A.]
2. Twin Rivers shall maintain records of the monthly and annual throughput of gasoline and shall notify the Department of its applicability within 30 days if the monthly or annual throughput of the Gasoline Storage Tank ever exceeds the initial applicability threshold. These records shall be maintained for a minimum of three years, shall be available for inspection during normal business hours, and shall be provided to the Department and/or EPA upon request. [06-096 C.M.R. ch. 118, § 10.B.]

O. Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity, except for no more than five minutes in any one-hour period during which time visible emissions shall not exceed 30% opacity. Compliance shall be determined by an aggregate of the individual fifteen-second opacity observations which exceed 20% in any one hour. [06-096 C.M.R. ch. 140, BPT]

P. General Process Sources

Visible emissions from any general process source shall not exceed an opacity of 20% on a six-minute block average basis. [06-096 C.M.R. ch. 140, BPT]

Q. Facility Annual Emissions

1. Total Annual Emissions

The table below provides an estimate of mill-wide potential emissions for the purposes of quantifying future license fees. The tons per year emissions were calculated based on a fuel limit of 2,800,000 gallons of #6 fuel oil per year for Boiler #6, a fuel limit of 3,000,000 gal/yr of propane for Propane-fired Dryers #1-13 (combined), 100 hours/year of operation each for Diesel Fire Pumps #1 and #2 and the Diesel Generator, and a conservative estimate of 130.0 tons/year of VOC for all paper coatings used at the facility:

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

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boiler #6	42.0	42.0	154.5	84.0	7.0	1.1
Propane-fired Dryers #1-6 and #11-13 (combined)	6.8	6.8	0.1	19.5	11.3	1.5
Diesel Fire Pump #1	0.1	0.1	0.1	0.5	0.1	0.1
Diesel Fire Pump #2	0.1	0.1	0.1	0.4	0.1	0.1
Diesel Generator	0.1	0.1	0.1	0.1	0.1	0.1
Paper Coating	--	--	--	--	--	130.0
Total TPY	49.1	49.1	154.9	104.5	18.6	132.9

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

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 C.F.R. Part 52, Subpart A, § 52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 C.M.R. ch. 100, 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).

The quantity of CO₂e emissions from this facility is less than 100,000 tons per year, based on the following:

- the facility's fuel use and operating hours limits;
- worst case emission factors from the following sources: U.S. EPA's AP-42, the Intergovernmental Panel on Climate Change (IPCC), and *Mandatory Greenhouse Gas Reporting*, 40 C.F.R. Part 98; and
- global warming potentials contained in 40 C.F.R. Part 98.

No additional licensing actions to address GHG emissions are required at this time.

III. AMBIENT AIR QUALITY ANALYSIS

Twin Rivers 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-263-71-B-R, issued on June 9, 1998). No substantial changes have been made to the facility since the previous air quality analysis was performed that would meaningfully affect the results of that analysis; therefore, an additional ambient air quality analysis is not required for this Part 70 License.

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-263-70-E-R/A pursuant to 06-096 C.M.R. ch. 140 and the preconstruction permitting requirements of 06-096 C.M.R. ch. 115 and subject to the standard and specific conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Twin Rivers pursuant to the Department's preconstruction permitting requirements have been incorporated into this Part 70 license, except for such conditions that the Department has determined are obsolete, extraneous, or otherwise environmentally insignificant, as explained in the Findings of Fact accompanying this Order. As such, the conditions in this license supersede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 for making such changes and pursuant to the applicable requirements in 06-096 C.M.R. ch. 140.

For each standard and 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 of this License 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.

STANDARD STATEMENTS

- (1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both; [06-096 C.M.R. ch. 140]
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [06-096 C.M.R. ch. 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 C.M.R. ch. 140]
- (4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license; [06-096 C.M.R. ch. 140]
- (5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 C.M.R. ch. 140]

- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
- A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or affect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated July 18, 2014.

Permit Shield Table

Source	Citation	Description	Basis for Determination
Boiler #6	40 C.F.R. Part 60, Subpart D	Standards of Performance for Fossil-Fuel-Fired Steam Generators	Boiler #6 is rated at less than 250 MMBtu/hr of heat input
	40 C.F.R. Part 60, Subpart Da	Standards of Performance for Electric Utility Steam Generating Units	Boiler #6 is not an electric utility steam-generating unit and is incapable of combusting more than 250 MMBtu/hr heat input of fossil fuels
Boiler #6	40 C.F.R. Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Boiler #6 was constructed prior to the applicability date (June 9, 1989) and has a heat input greater than 100 MMBtu/hr
Boiler #6	40 C.F.R. Part 63, Subpart DDDDD	NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	Facility is not a major source of HAP

<u>Source</u>	<u>Citation</u>	<u>Description</u>	<u>Basis for Determination</u>
Boiler #6	06-096 C.M.R. ch. 117	Source Surveillance – Emissions Monitoring	Boiler #6 is limited to an annual average capacity factor of less than 30% by a federally enforceable license condition
Parts Washers	40 C.F.R. Part 63, Subpart T	NESHAP for Halogenated Solvent Cleaning	Facility's parts washers (degreasers) do not use any solvents that contain chemicals subject to this regulation in concentrations subject to this regulation
Proof Presses	40 C.F.R. Part 63, Subpart KK	NESHAP for the Printing and Publishing Industry	Proof presses, as the one Twin Rivers operates, are exempt
	06-096 C.M.R. ch. 132	Graphic Arts – Rotogravure and Flexography	Facility's proof press is operated in the lab and used for quality control purposes. The proof press does not meet the definition of a printing press (continuous substrate or sheet)
Facility	40 C.F.R. Part 64	Compliance Assurance Monitoring	None of the units at the facility meet all three applicability criteria
	40 C.F.R. Part 60, Subpart BB	Standards of Performance for Kraft Pulp Mills	Facility does not include a kraft pulp mill
	40 C.F.R. Part 60, Subpart BBa	Standards of Performance for Kraft Pulp Mill Affected Sources for which Construction, Reconstruction, or Modification Commenced after May 23, 2013	Facility does not include a kraft pulp mill
	40 C.F.R. Part 63, Subpart S	NESHAP from the Pulp and Paper Industry	Facility is not a major source of HAP and does not use the processes and materials listed in 40 C.F.R. § 63.440(a)
	40 C.F.R. Part 63, Subpart JJJJ	NESHAP: Paper and Other Web Coating	Facility is not a major source of HAP
	40 C.F.R. Part 82, Subpart E	The Labeling of Products Using Ozone-Depleting Substances	Facility does not use substances subject to this regulation
Facility	06-096 C.M.R. ch. 107	Sulfur Dioxide Emission Standards for Sulfite Pulp Mills	Sulfite pulp mill is located in Edmundston, New Brunswick, Canada and is therefore not part of this facility

<u>Source</u>	<u>Citation</u>	<u>Description</u>	<u>Basis for Determination</u>
Facility	06-096 C.M.R. ch. 111	Petroleum Liquid Storage Vapor Control	Facility does not have tanks that are subject to this regulation
	06-096 C.M.R. ch. 124	Total Reduced Sulfur Control from Kraft Pulp Mills	Facility does not include a kraft pulp mill
	06-096 C.M.R. ch. 129	Surface Coating Facilities	Facility does not own, operate, or participate in any activities that would be subject to this regulation
	06-096 C.M.R. ch. 134	VOC RACT	Boilers, paper machines, and on- and off-line coaters and dryers are exempt from this rule. Potential to emit VOCs from the remaining equipment is less than 40 tpy.

[06-096 C.M.R. ch. 140]

- (7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of three or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to 06-096 C.M.R. ch. 140;
 - B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
 - C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
 - D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[06-096 C.M.R. ch. 140]

- (8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading, and other similar programs or processes for changes that are provided for in the Part 70 license. [06-096 C.M.R. ch. 140]

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (38 M.R.S. § 347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140. [06-096 C.M.R. ch. 140]
- (3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 C.M.R. ch. 140] **Enforceable by State-only**
- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to 38 M.R.S. § 353-A.
- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 C.M.R. ch. 140]
Enforceable by State-only

- (6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license. [06-096 C.M.R. ch. 140]
- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [06-096 C.M.R. ch. 140]
- (8) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:
- A. Perform stack testing under circumstances representative of the facility's normal process and operating conditions:
 - 1. Within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring, or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
 - 2. To demonstrate compliance with the applicable emission standards; or
 - 3. Pursuant to any other requirement of this license to perform stack testing.
 - B. Install or make provisions to install test ports that meet the criteria of 40 C.F.R. Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - C. Submit a written report to the Department within thirty (30) days from date of test completion.

[06-096 C.M.R. ch. 140] **Enforceable by State-only**

- (9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:
- A. Within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department; and
 - B. The days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - C. The licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 C.M.R. ch. 140] **Enforceable by State-only**

- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.
- A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;
 - B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 M.R.S. § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during startup or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design, or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

C. All other deviations shall be reported to the Department in the facility's semiannual report.

[06-096 C.M.R. ch. 140]

- (11) Upon the written request of the Department, the licensee shall establish and maintain such records; make such reports; install, use, and maintain such monitoring equipment; sample such emissions in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe; and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 C.M.R. ch. 140]
- (12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [06-096 C.M.R. ch. 140]
- (13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
 - A. The identification of each term or condition of the Part 70 license that is the basis of the certification;
 - B. The compliance status;
 - C. Whether compliance was continuous or intermittent;
 - D. The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - E. Such other facts as the Department may require to determine the compliance status of the source.

[06-096 C.M.R. ch. 140]

SPECIFIC CONDITIONS

(14) Facility-wide HAP Limit

Twin Rivers shall be limited to a facility-wide HAP limit of 9.9 tons/year for any single HAP and 24.9 tons/year for total HAP on a 12-month rolling total basis. To demonstrate compliance with this limit, Twin Rivers shall maintain and make available upon request a current list of all HAP-containing materials in use at the facility. This list shall provide the necessary data to determine compliance, including:

- Names and types of all HAP-containing materials in use;
- Identification of each HAP in these materials;
- Percent HAP by weight or pounds of HAP per gallon for each material;
- The quantity of HAP-containing materials purchased on a monthly basis; and
- The quantity of HAP-containing materials shipped offsite on a monthly basis.

All HAP in these materials is assumed to be released into the atmosphere. Monthly HAP totals shall be determined using the following equation:

$$\text{Monthly HAP Emissions} = \sum_{i=1}^n (\text{A} \times \text{HAP content}) - (\text{B} \times \text{HAP content})$$

Where:

- i = each HAP containing material used at the facility during the month;
- n = the number of HAP containing materials used at the facility during the month;
- A = monthly facility usage of HAP containing materials; and
- B = Quantities of HAP containing materials shipped offsite

The monthly totals of HAPs shall be used to calculate and track HAP emissions on a 12-month rolling total basis. Twin Rivers shall make these records available to the Department upon request.

[06-096 C.M.R. ch. 140, BPT]

(15) Boiler #6 – 240 MMBtu/hr

A. Fuels

1. Twin Rivers is licensed to operate Boiler #6 (240 MMBtu/hr) which is licensed to fire #6 fuel oil and specification waste oil (as defined in Section (4.)(B.) of 06-096 C.M.R. ch. 860) generated onsite as the primary fuels and distillate fuel for startup. [06-096 C.M.R. ch. 140, BPT & 06-096 C.M.R. ch. 860]
2. The fuel use limit for Boiler #6 shall be 2,800,000 gallons/year of #6 fuel oil on a 12-month rolling total basis. [06-096 C.M.R. ch. 140, BPT]
3. Fuel Sulfur Content
 - a. #6 Fuel Oil
 - (1) Prior to July 1, 2018, the #6 fuel oil fired at the facility shall have a maximum sulfur content of 0.7% by weight demonstrated by purchase records from the supplier. [A-263-70-A-I (6/28/02), BPT]
 - (2) Beginning July 1, 2018, the #6 fuel oil fired at the facility shall have a maximum sulfur content of 0.5% by weight. [38 M.R.S. §§ 603-A(2)(A)(1)]
 - b. Distillate Fuel
 - (1) Prior to July 1, 2018, the distillate fuel fired at the facility shall have a maximum sulfur content of 0.5% by weight. [06-096 C.M.R. ch. 140, BPT]
 - (2) Beginning July 1, 2018, the facility shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [38 M.R.S. § 603-A(2)(A)(3)]
 - c. Sulfur content compliance shall be demonstrated by purchase records from the supplier which indicate the type and percent sulfur of the fuel delivered. [06-096 C.M.R. ch. 140, BPT]

4. Fuel Sulfur Content and Fuel Limit Compliance

Twin Rivers shall maintain records on a monthly and 12-month rolling total basis of #6 fuel oil use indicating the quantity of fuel consumed (gallons and the percent (%) sulfur content of the fuel by weight), demonstrated by fuel records from the supplier indicating the sulfur content of the fuel, by weight, and tank fuel level marker/meter/gauge measurements and related calculations indicating the monthly quantity of fuel used. [A-263-70-A-I (6/28/02), BPT & 06-096 C.M.R. ch. 140, BPT]

B. Boiler #6 Emission Limits

1. Emissions from Boiler #6 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	06-096 C.M.R. ch. 103 § 2.A.(1)	Enforceable by State-only
PM ₁₀	0.20	A-263-71-B-R (6/9/98), BPT	Enforceable by State-only
NO _x	0.40	A-263-71-E-A (4/16/96), NO _x RACT	Enforceable by State-only

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	48.0	A-263-71-B-R (6/9/98), BPT	Enforceable by State-only
PM ₁₀	48.0	A-263-71-B-R (6/9/98), BPT	Enforceable by State-only
SO ₂	175.8	A-263-71-B-R (6/9/98), BPT	Enforceable by State-only
NO _x	96.0	A-263-71-B-R (6/9/98), BPT	Enforceable by State-only
CO	8.0	A-263-71-B-R (6/9/98), BPT	Enforceable by State-only
VOC	1.2	06-096 C.M.R. ch. 140, BPT	Enforceable by State-only

2. Visible emissions from Boiler #6 shall not exceed 30% opacity on a six-minute block average basis, except no more than two six-minute block averages in a three-hour block period, during which time visible emissions shall not exceed 50% opacity. Compliance with this limit shall be determined using 40 C.F.R. Part 60, App. A, Method 9, on an as requested basis. [06-096 C.M.R. ch. 140, BPT]

C. Compliance Methods

Compliance with the emission limits listed above shall be demonstrated in accordance with the following methods and frequencies, or other methods and frequencies as approved by the Department [06-096 C.M.R. ch. 140, BPT]:

Pollutant	Unit of Emission Standard	Compliance Method	Frequency
PM	lb/MMBtu and lb/hr	40 C.F.R. Part 60, App. A, Method 5	As requested
PM ₁₀	lb/MMBtu and lb/hr	40 C.F.R. Part 60, App. A, Method 5 or EPA Test Method 201 or 201A	As requested
SO ₂	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO _x	lb/MMBtu and lb/hr	40 C.F.R. Part 60, App. A, Method 7	As requested
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested
VOC	lb/hr	40 C.F.R. Part 60, App. A, Method 25 or 25A	As requested

D. Twin Rivers shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJJ applicable to Boiler #6 including, but not limited to, the following:

1. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]
 - a. Each tune-up shall be conducted every two years. [40 C.F.R. § 63.11223(a) and Table 2]
 - b. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
 - (1) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]
 - (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]
 - (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]

- (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
 - (5) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]
 - (6) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. [40 C.F.R. § 63.11223(b)(7)]
- c. Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information [40 C.F.R. § 63.11223(b)(6)]:
- (1) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
 - (2) A description of any corrective actions taken as part of the tune-up of the boiler; and
 - (3) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

2. Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in 40 C.F.R. §§ 63.11225(b)(1) and (2), including the following [40 C.F.R. § 63.11225(b)]:

- a. Company name and address;
- b. A statement of whether the source has complied with all the relevant requirements of this Subpart;
- c. A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;

d. The following certifications, as applicable:

- (1) "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
- (2) "No secondary materials that are solid waste were combusted in any affected unit."
- (3) "This facility complies with the requirement in 40 C.F.R. §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

3. Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJ including the following [40 C.F.R. § 63.11225(c)]:

- a. Copies of notifications and reports with supporting compliance documentation;
- b. Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
- c. Records of the occurrence and duration of each malfunction of each applicable boiler; and
- d. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

(16) Diesel Fire Pumps #1 and #2 and Diesel Generator

A. Allowable Fuels and Fuel Sulfur Content

1. Diesel Fire Pumps #1 and #2 and Diesel Generator shall fire distillate fuel with a fuel sulfur limit not to exceed 0.05% by weight. [A-263-70-C-R (1/20/10), BPT]

2. Beginning July 1, 2018, the facility shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm) for use in Diesel Fire Pumps #1 and #2 and Diesel Generator. [38 M.R.S. § 603-A(2)(A)(3)]
3. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [A-263-70-C-R (1/20/10), BPT]

B. Emissions shall not exceed the following limits [A-263-70-C-R (1/20/2010), BPT]:

Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Diesel Fire Pump #1	0.3	0.3	0.1	9.7	2.1	0.8
Diesel Fire Pump #2	0.2	0.2	0.1	7.9	1.7	0.6
Diesel Generator	0.1	0.1	0.1	2.6	0.6	0.2

C. Visible emissions from Diesel Fire Pumps #1 and #2 and Diesel Generator shall each not exceed 30% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 140, BPT]

D. Diesel Fire Pumps #1 and #2 and Diesel Generator shall all meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following:

1. Twin Rivers shall meet the following operational limitations for each of the compression ignition emergency engines (Diesel Fire Pumps #1 and #2 and Diesel Generator):
 - a. Change the oil and filter annually,
 - b. Inspect the air cleaner annually, and
 - c. Inspect the hoses and belts annually and replace as necessary.

Records shall be maintained documenting compliance with the operational limitations.

[40 C.F.R. § 63.6603(a) and Table 2(d) & 06-096 C.M.R. ch. 140, BPT]

2. Oil Analysis Program Option

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

3. Non-Resettable Hour Meter

A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 63.6625(f)]

4. Maintenance, Testing, and Non-Emergency Operating Situations

a. The engines shall each be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written logs) of all engine operating hours. [40 C.F.R. § 63.6640(f) & 06-096 C.M.R. ch. 140, BPT]

b. Twin Rivers shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, the number of hours each unit operated for non-emergency purposes, and the reason each engine was in operation during each time. [40 C.F.R. §§ 63.6655(e) and (f)]

5. Operation and Maintenance

The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or Twin Rivers shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

6. Startup Idle and Startup Time Minimization

During periods of startup the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) & 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(17) Paper Machines, Size Press, On- and Off-Line Coaters, and Propane-Fired Dryers

A. Paper Machines, Size Press, and On- and Off Machine Coaters

1. PM #7 Online Coater and C-2 Off Machine Coater operated at Twin Rivers shall run with only aqueous-based coatings. The VOC content of the coatings shall remain below 2.9 lb VOC/gallon. [06-096 C.M.R. ch. 123 & A-263-71-B-R (6/9/98), BPT]
2. Twin Rivers shall maintain the following records on site for all coatings used at the facility on a monthly and 12-month rolling total basis [06-096 C.M.R. ch. 123 & A-263-70-A-I (6/28/02), BPT]:
 - a. Amount of VOC containing chemicals (in lb VOC/gallon, less water) in applied coatings;
 - b. Volume (in gallons) of coating applied each month;
 - c. Total VOCs emitted from coatings on a monthly and 12-month rolling total basis; and
 - d. Certification stating all coatings used at the facility are below 2.9 lb VOC/gallon, excluding water and negligibly reactive VOC compounds.
3. Visible emissions from Paper Machines #4-8, the Paper Machine #7 Online Coater, and the C-2 Off Machine Coater shall each not exceed 20% opacity on a six-minute block average basis. Compliance with this limit shall be demonstrated by conducting EPA Method 9 visible emissions tests on an as-requested basis. [06-096 C.M.R. ch. 101, § 2.B.3.d.]

B. Propane-Fired Dryers

1. Fuel

- a. Total fuel use for all nine Propane-fired Dryers combined shall not exceed 3,000,000 gal/yr of propane, based on a 12-month rolling total basis. [06-096 C.M.R. ch. 140, BPT]

- b. Compliance shall be demonstrated by fuel records from the supplier showing the quantity and type of the fuel delivered. Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 C.M.R. ch. 140, BPT]

2. Emissions shall not exceed the following:

<u>Unit</u>	<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>Origin and Authority</u>
Propane-fired Dryers #1-6 and #11-13 [each]	PM	0.05	06-096 C.M.R. ch. 140, BPT

3. Emissions shall not exceed the following [06-096 C.M.R. ch. 140, BPT]:

<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>
Propane-fired Dryers #1-4 [each]	0.25	0.25	0.01	0.72	0.41	0.06
Propane-fired Dryers #5-6 [each]	0.35	0.35	0.01	1.01	0.58	0.08
Propane-fired Dryer #11	0.15	0.15	0.01	0.44	0.25	0.03
Propane-fired Dryers #12-13 [each]	0.31	0.31	0.01	0.89	0.51	0.07

4. Visible emissions from Propane-fired Dryers #1-6 and #11-13 shall each not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 140, BPT]

(18) Storage Silos TK13854, TK13855, and TK13856

- A. Twin Rivers is licensed to have storage silos TK13854, TK13855, and TK13856 in service. [A-263-77-1-A (1/27/2017), BACT]
- B. Twin Rivers shall operate and maintain baghouses on storage silos TK13854, TK13855, and TK13856 to control particulate matter emissions generated during the loading and unloading of the storage silos. Visible emissions from each storage silo shall not exceed 10% opacity on a six-minute block average basis. Corrective action shall be taken if emissions exceed 5% opacity on a six-minute block average basis. In order to document maintenance of the baghouses, Twin Rivers shall keep a maintenance log recording the date of all bag failures and routine baghouse inspections and maintenance. [A-263-77-1-A (1/27/2017), BACT]

(19) Parts Washers

Parts washers at Twin Rivers are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130.

A. Twin Rivers shall keep records of the amount of solvent added to each parts washer. [06-096 C.M.R. ch. 140, BPT]

B. The following are exempt from the requirements of 06-096 C.M.R. ch. 130 [06-096 C.M.R. ch. 130]:

1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
2. Wipe cleaning; and,
3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.

C. The following standards apply to cold cleaning machines that are subject to 06-096 C.M.R. ch. 130.

1. Twin Rivers shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 C.M.R. ch. 130]:
 - a. Waste solvent shall be collected and stored in closed containers.
 - b. Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
 - c. Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized, or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
 - d. The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
 - e. Sponges, fabric, wood, leather, paper products, and other absorbent materials shall not be cleaned in the parts washer.
 - f. When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
 - g. Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
 - h. Work area fans shall not blow across the opening of the washer unit.
 - i. The solvent level shall not exceed the fill line.

2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 C.M.R. ch. 130]

(20) Gasoline Storage Tank

- A. The fill pipe shall extend within six inches of the bottom of the gasoline storage tank. [06-096 C.M.R. ch. 118, § 4.A.]
- B. Twin Rivers shall maintain records of the monthly and annual throughput of gasoline and shall notify the Department of its applicability within 30 days if the monthly or annual throughput of the Gasoline Storage Tank ever exceeds the initial applicability threshold. These records shall be maintained for a minimum of three years, shall be available for inspection during normal business hours, and shall be provided to the Department and/or EPA upon request. [06-096 C.M.R. ch. 118, § 10.B.]

(21) Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity, except for no more than five minutes in any one-hour period during which time visible emissions shall not exceed 30% opacity. Compliance shall be determined by an aggregate of the individual fifteen-second opacity observations which exceed 20% in any one hour. [06-096 C.M.R. ch. 140, BPT]

(22) General Process Sources

Visible emissions from any general process source shall not exceed an opacity of 20% on a six-minute block average basis. [06-096 C.M.R. ch. 140, BPT]

(23) Semiannual Reporting [06-096 C.M.R. ch. 140]

- A. The licensee shall submit to the Bureau of Air Quality semiannual reports which are due on **January 31st** and **July 31st** of each year. The facility's designated responsible official must sign this report.
- B. The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the Department within seven calendar days of the due date.
- C. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- D. Each semiannual report shall include the annual capacity factor of Boiler #6 for each fuel.

E. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

(24) Annual Compliance Certification

Twin Rivers shall submit an annual compliance certification to the Department and EPA in accordance with Standard Condition (13) of this license. The annual compliance certification is due January 31st of each year. The facility's designated responsible official must sign this report.

The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the Department within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [06-096 C.M.R. ch. 140]

(25) Annual Emission Statement

In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, the licensee shall annually report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory. The emission statement shall be submitted by the date specified in 06-096 C.M.R. ch. 137.

(26) General Applicable State Regulations

The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
06-096 C.M.R. ch. 102	Open Burning	-
06-096 C.M.R. ch. 109	Emergency Episode Regulation	-
06-096 C.M.R. ch. 110	Ambient Air Quality Standards	-
06-096 C.M.R. ch. 116	Prohibited Dispersion Techniques	-
38 M.R.S. § 585-B, §§5	Mercury Emission Limit	Enforceable by State-only

(27) Units Containing Ozone Depleting Substances

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. Examples of such units include refrigerators and any size air conditioners that contain CFCs. [40 C.F.R. Part 82, Subpart F]

(28) Asbestos Abatement

When undertaking Asbestos abatement activities, Twin Rivers shall comply with the *Standard for Asbestos Demolition and Renovation*, 40 C.F.R. Part 61, Subpart M.

(29) Expiration of a Part 70 license

- A. Twin Rivers shall submit a complete Part 70 renewal application at least six but no more than 18 months prior to the expiration of this air license.
- B. Pursuant to Title 5 M.R.S. § 10002, and 06-096 C.M.R. ch. 140, the Part 70 license shall not expire and all terms and conditions shall remain in effect until the Department takes final action on the renewal application of the Part 70 license. An existing source submitting a complete renewal application under 06-096 C.M.R. ch. 140 prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license. **Enforceable by State-only**

(30) **New Source Review**

Twin Rivers is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emission license, and the NSR requirements remain in effect even if this 06-096 C.M.R. ch. 140 Air Emission License, A-263-70-E-R/A, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 14 DAY OF August, 2018.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Corne for
PAUL MERCER, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

[Note: If a complete renewal application, as determined by the Department, is submitted at least six but no more than 18 months prior to expiration of the facility's Part 70 license, then pursuant to Title 5 M.R.S. §10002, all terms and conditions of the Part 70 license shall remain in effect until the Department takes final action on the Part 70 license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 7/18/2014

Date of application acceptance: 7/18/2014

Date filed with the Board of Environmental Protection:

This Order prepared by Jonathan E. Rice, Bureau of Air Quality.

