



DEPARTMENT ORDER

Twin Rivers Paper Company LLC
Aroostook County
Madawaska, Maine
A-263-77-1-A

Departmental
Findings of Fact and Order
New Source Review
NSR #1

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

FACILITY	Twin Rivers Paper Company LLC (Twin Rivers)
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Modification
NAICS CODES	322121 (paper (except newsprint) mills)
NATURE OF BUSINESS	Paper Mill
FACILITY LOCATION	82 Bridge Avenue, Madawaska, Maine

B. NSR License Description

Twin Rivers Paper Company LLC (Twin Rivers) has requested a New Source Review (NSR) license to install two new starch silos and a talc silo to replace three existing starch silos.

C. Emission Equipment

The following equipment is addressed in this NSR license:

Storage Silos

<u>Equipment</u>	<u>Production Rate</u>	<u>Date of Installation</u>	<u>Pollution Control Equipment</u>
TK13854	7,500 lbs/hr	2013	Baghouse
TK13855	1,200 lbs/hr	2016	Baghouse
TK13856	4,500 lbs/hr	2016	Baghouse

Storage silos TK13851, TK13852, and TK13853 were all removed in 2013.

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 the addition of two new starch silos (TK13854 and TK13855) and a new talc silo (TK13856) does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements.

The modification of a major source is considered a major or minor modification based on whether or not expected emissions increases exceed the "Significant Emission Increase" levels as given in *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100. Twin Rivers is replacing three existing storage silos controlled by baghouses with three new storage silos controlled by baghouses; therefore, there is no expected change in emissions from their current actual emissions, and thus there will be no change in license allowed emissions.

Therefore, this NSR license is determined to be a minor modification under *Minor and Major Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 since the changes being made are not addressed or prohibited in the Part 70 air emission license. An application to incorporate the requirements of this NSR license into the Part 70 air emission license shall be submitted no later than 12 months from commencement of the requested operation. Twin Rivers submitted this application December 15, 2016.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 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 new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Storage Silos (new)

1. Project Description

This project licenses the replacement of three existing starch silos (TK13851, TK13852, and TK13853) with two new starch silos and a new talc silo (TK13854, TK13855, and TK13856, respectively).

2. BACT for Storage Silos

For the control of particulate matter emissions generated by the loading and storage of material, industry and regulatory standards prescribe baghouses with a particulate matter control efficiency of 99.9% and regular maintenance and inspection of the baghouses as BACT. The Department has determined this to be BACT for the two new starch silos (TK13854 and TK13855) and one new talc silo (TK13856). Additionally, the Department has determined that BACT for visible emissions from the TK13854, TK13855, and TK13856 baghouses shall be a limit of 10% opacity on a six-minute block average basis, with a requirement for corrective action to be taken if emissions from any of the baghouses exceed 5% opacity on a six-minute block average basis.

C. Incorporation Into the Part 70 Air Emission License

The requirements in this 06-096 C.M.R. ch. 115 New Source Review license shall apply to the facility upon issuance. Per *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140 § 1(C)(8), for a modification at the facility that has undergone NSR requirements or been processed through 06-096 C.M.R. ch. 115, the source must apply for an amendment to their Part 70 license within one year of commencing the proposed operations, as provided in 40 C.F.R. Part 70.5. Twin Rivers applied for an amendment to incorporate the requirements of this NSR license into their Part 70 license on December 15, 2016.

D. Annual Emissions

This NSR license will not change the facility's licensed annual emissions.

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

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ORDER

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

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

The Department hereby grants New Source Review License A-263-77-1-A pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the specific conditions below.

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.

SPECIFIC CONDITIONS

- (1) Twin Rivers is licensed to install and operate storage silos TK13854, TK13855, and TK13856. [06-096 C.M.R. ch. 115, BACT]

(2) **Storage Silos**

Twin Rivers shall install and operate 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 required to be taken if emissions from any of the baghouses 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. [06-096 C.M.R. ch. 115, BACT]

DONE AND DATED IN AUGUSTA, MAINE THIS 27 DAY OF January, 2017.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Paul Mercer*
PAUL MERCER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 12/15/2016

Date of application acceptance: 12/15/2016

Date filed with the Board of Environmental Protection:

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

