

**Rumford Paper Company
Oxford County
Rumford, Maine
A-214-70-F-A & A-214-77-4-A**

**Departmental
Findings of Fact and Order
NSR Amendment #4
Part 70 Amendment #3**

After review of the application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, § 344 and § 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Rumford Paper Company (The Mill)
CURRENT PART 70 LICENSE	A-214-70-A-I
LICENSE TYPE	Part 70 Significant Modification & NSR Minor Modification
NAICS CODES	322121
NATURE OF BUSINESS	Pulp & Paper Mill
FACILITY LOCATION	Rumford, Maine
AMENDMENT ISSUANCE DATE	

B. Amendment Description

Rumford Paper Company (The Mill) has requested an amendment to their Part 70 air emission license to modify current monitoring and testing requirements. Specifically, the requirement to stack test Boilers #3 and #5 every other year for PM and the requirement to continuously monitor fan amperage in the ClO₂ Generation Plant scrubber system.

C. Application Classification

The application for The Mill addresses what have been determined to be substantial changes to existing monitoring and testing requirements, therefore the license is considered to be a Part 70 Significant License Modification issued under *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (last amended December 24, 2005) as well as a Minor Modification issued under *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 24, 2005).

II. FACILITY AND EMISSION UNIT DESCRIPTION

A. Power Boilers #3 and #5

The Mill's Part 70 air emission license requires them to demonstrate compliance with the particulate matter (PM) emission limits for Boilers #3 and #5 through stack testing once every two years. Boilers #3 and #5 have operated intermittently during the past two years. Boiler #5 has not operated at all during 2007 and is not expected to resume operation before the end of the year.

The Mill has requested that the PM stack testing schedule be amended to incorporate flexibility to accommodate the infrequent operation of these units. The Mill has proposed changing the schedule to require stack testing once every two "qualifying years" where a qualifying year is a calendar year in which a boiler has operated for at least 10% of the potential amount of operating hours (876 hours).

B. ClO₂ Generation Plant Scrubber System

The Mill's Part 70 air emission license requires them to monitor the following parameters for the Bleach Plant Scrubber Systems A and B and the ClO₂ Generation Plant Scrubber System:

Parameter for each scrubber	Monitor	Record
recycle flow	continuously	once per shift
pressure drop	continuously	once per shift
recycle ORP	continuously	once per shift
fan amperage	continuously	once per shift

The basis for these monitoring requirements stem from the MACT standard for the Pulp and Paper Industry (40 CFR 63, Subpart S) and *Chlorine and Chlorine Dioxide Emission Standard*, 06-096 CMR 122. However, the ClO₂ Generation Plant is not part of the bleaching system as defined in 40 CFR 63, Subpart S and 06-096 CMR 122 does not require the fan amperage to be continuously monitored for this equipment.

The Mill has proposed changing the monitoring requirements to require that fan "on/off" be monitored on the ClO₂ Generation Plant Scrubber rather than amperage.

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

The Department hereby grants the Part 70 License A-214-70-F-A pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 115 and subject to the standard and special conditions below.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License 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.

The following shall replace Condition (24)(C) of Air Emission License A-214-70-A-I:

C. Boiler #3 and #5 shall each not exceed the following emission limits:

Pollutant	lb/MMBtu (each boiler)	Fuel	Ave Time
PM	0.05	any combination of oil, natural gas, NCGs, SOGs, HVLCs	--
	0.08	oil with any two or more of NCGs, SOGs, HVLC	
	0.03	natural gas firing only	
PM ₁₀	0.05	any combination of oil, natural gas, NCGs, SOGs, HVLCs	--
	0.08	oil with any two or more of NCGs, SOGs, HVLC	
	0.03	natural gas firing only	
SO ₂	0.26	any combination	24-hr block
	0.01	natural gas firing only	
NO _x	0.40	any combination	30-day rolling
	0.20	natural gas firing only	
CO	0.20	any combination	--
VOC	0.015	any combination	--

Pollutant	lb/hour (each boiler)	Fuel	Ave Time
PM	15.0	any combination of oil, natural gas, NCGs, SOGs, HVLCs	--
	24.0	oil with any two or more of NCGs, SOGs, HVLCs	
PM ₁₀	15.0	any combination of oil, natural gas, NCGs, SOGs, HVLCs	--
	24.0	oil with any two or more NCGs, SOGs, HVLCs	
SO ₂	78.0 ^{a,b}	any combo	3-hr block
NO _x	120.0	any combo	30-day rolling
CO	60.0	any combo	--
VOC	4.5	any combo	--

- a. When Boiler #6 and/or #7 is firing only fuel oil or performing a gravimetric calibration and SO₂ emissions are above 250.0 lb/hr, SO₂ emissions from the common stack for Boilers #3 and #5 shall be limited to a total of 60.0 lb/hr. The Mill shall keep records of the dates and times of all gravimetric calibrations and the date and time of any firing of only fuel oil in Boilers #6 and #7.
 - b. When the Recovery Boiler C is firing only fuel oil and SO₂ emissions are above 206.3, SO₂ emissions from the common stack for Boilers #3 and #5 shall be limited to a total of 60.0 lb/hr. The Mill shall keep records of the date and time of any firing of only fuel oil in Recovery Boiler C.
- [MEDEP Chapter 140, BPT]

The following shall replace Condition (24)(F) of Air Emission License A-214-70-A-I:

- F. Compliance with the lb/MMBtu particulate matter limits shall be demonstrated by stack testing performed on each boiler once every two qualifying operating years. For this condition, a qualifying operating year for an individual boiler is any calendar year in which that individual boiler was operated for at least 876 hours. [06-096 CMR 140, BPT]

The following shall replace Condition (31)(F) of Air Emission License A-214-70-A-I:

- F. The Mill shall monitor and record the following for each of the Bleach Plant Scrubber Systems A & B, and the ClO₂ Generation Plant Scrubber System:

Parameter for each scrubber	Monitor	Record
recycle flow	continuously	once per shift
pressure drop	continuously	once per shift
recycle flow ORP	continuously	once per shift
Bleach Plant Scrubber fan amperage	continuously	once per shift
ClO ₂ Scrubber fan "on/off"	continuously	once per shift

[06-096 CMR 122, 40 CFR Part 63, §63.453(c), and 06-096 CMR 140]

DONE AND DATED IN AUGUSTA, MAINE THIS _____ DAY OF _____ 2007.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 11/1/07

Date of application acceptance: 11/1/07

Date filed with the Board of Environmental Protection: _____

This Order prepared by Lynn Ross, Bureau of Air Quality.