



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

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COMMISSIONER

**Woodland Pulp LLC
Washington County
Baileyville, Maine
A-215-77-6-A**

**Departmental
Findings of Fact and Order
New Source Review
NSR #6**

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 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Woodland Pulp LLC
LICENSE TYPE	06-096 CMR 115, Minor Modification
NAICS CODES	322121
NATURE OF BUSINESS	Pulp Production
FACILITY LOCATION	144 Main Street, Baileyville, Maine

B. New Source Review (NSR) License Description

Woodland Pulp LLC (Woodland Pulp) has requested a New Source Review (NSR) Minor Modification License to permit the replacement of the No. 4 Paper Machine with two new LDC (light dry crepe) Tissue Machines. A NSR license was issued to Woodland Pulp August 7, 2012, to license the replacement of the No. 4 Paper Machine with one new tissue machine utilizing a technology other than LDC technology. The facility has since decided to pursue the construction and operation of two LDC machines; thus, this NSR license shall supersede the NSR license #5 previously issued to the facility (air emission license A-215-77-5-A, issued August 7, 2012).

The two 200-inch LDC machines will each be capable of producing approximately 187 air-dried tons of finished product per day (ADTFPD) of bath, towel, and napkin grade tissue products, with production volume varying depending on the final grade mix of products to be manufactured. Each machine will utilize a Yankee dryer, which includes a large steam-heated drum and a hood in which hot air impinges on the paper sheet. The tissue will be separated from the drum by a doctor blade. The hot air in the hood will be heated by direct-fired natural gas

burners with a combined heat input capacity of approximately 120 MMBtu/hour. The Yankee drum will be heated by steam provided by the existing steam plant. Steam production at the mill will not increase as a result of this project, as steam will be diverted from other sources to supply the Yankee drum. Woodland Pulp does not plan to increase its pulp production capacity to accommodate these units, but will instead divert a portion of current pulp production from its existing Flakt pulp dryer to the new Tissue Machines.

The two new tissue machines will be co-located in the machine building that formerly housed the No. 4 Paper Machine.

C. Emission Equipment

The following equipment is addressed in this air emission license:

Equipment	Maximum Fuel Firing Capacity	Fuel Type	Stack #
Tissue Machines	120 MMBtu/hr	natural gas (direct-fired, in the dryer section)	fugitive
No. 9 Power Boiler	740 MMBtu/hr	Several (See license A-215-70-I-R/A for a full description and the complete listing of fuels.)	PB

The No. 9 Power Boiler is addressed in this license only in the context of annual emissions caps for certain pollutants. Other licensed descriptions, limitations, and requirements for the No. 9 Power Boiler are not affected by this NSR license.

D. Application Classification

The application for two new Tissue Machines to replace the No. 4 Paper Machine does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements. This application includes a Best Available Control Technology (BACT) analysis performed per New Source Review.

A modification is identified as major or minor based on whether or not expected emissions increases exceed the "Significant Emission Increase" levels as given in *Definitions Regulation*, 06-096 CMR 100 (as amended). Net emission increases are determined by subtracting the average actual emissions of a 24-month period most representative of normal operation within the ten years preceding the modification from the future actual emissions. In accordance with 06-096 CMR 100(15)(B), May 2004 through April 2006 was identified by the source as the consecutive 24-month period representing the highest emissions of all regulated pollutants during normal historic operation of these two units and was thus selected as the actual emissions baseline period.

Baseline actual emissions from the No. 4 Paper Machine were determined for PM and VOC, the only two pollutants emitted by this unit. Baseline actual emissions of these two pollutants were also determined for the No. 9 Power Boiler, with the intent to establish a PM and VOC cap for combined emissions from both the LDC Tissue Machines and the No. 9 Power Boiler. The No. 9 Power Boiler's recent conversion from No. 6 fuel oil to natural gas resulted in emission reductions that will enable the total future emissions of both the power boiler and the two new tissue machines to remain below the significant emissions increase levels, in order to classify this project as a minor modification.

The anticipated emissions increases from the project for NO_x, CO, SO₂, and CO_{2e} are less than the significant emissions increase thresholds. The anticipated emissions increases from the project for PM, PM₁₀, and PM_{2.5} are above the significant emissions increase threshold for each category of particulate matter pollutant and therefore are being capped with the power boiler emissions to net below the significant threshold for PM_{2.5}, the lowest significant emission increase threshold of the three. The project emissions increase for VOC is below the significant emission increase threshold, but there is uncertainty in the emission projections for that pollutant (the manufacturer is as yet undetermined, and there is a wide variation in specific testing data from NCASI studies of US facilities). Thus, the Woodland facility is proposing a cap of VOC emissions from the two tissue machines and the No. 9 Power Boiler combined to allow increased flexibility in the event that VOC emissions from the tissue machines are higher than originally predicted.

To determine projected actual emissions prior to construction, Woodland Pulp used the tissue machines' combined potential to emit, as provided by one of the potential manufacturers, for PM, SO₂, NO_x, CO, and HAP. Projected actual emissions of CO_{2e}, not provided by the manufacturer, were approximated based on the estimated maximum heat input capacity of the drying units at 60 MMBtu/hour each, an annual operation period of 8760 hours per year, and an AP-42 emission factor of 120,000 lb CO_{2e}/MMscf for the external combustion of natural gas.

Because of the uncertainty in available manufacturer data, Woodland Pulp has elected to use an industry-based emission factor developed by NCASI to estimate projected actual emissions from the two tissue machines. The application includes the proposal of a VOC emission factor of 0.44 lb/ADTFP, representing an average of the VOC emissions from NCASI's MACT III study published in July 1997.* The emission factor is also consistent with factors used in recently licensed tissue projects in Maine and New Hampshire.

*(NCASI Technical Bulletin No. 740, Volatile Organic Compound Emissions from Non-Chemical Pulp and Paper Mill Sources: Part V – Paper Machines)

The results of the comparison of combined baseline actual emissions from the No. 9 Power Boiler and the No. 4 Paper Machine to combined projected actual emissions from the No. 9 Power Boiler and the two new Tissue Machines are as follows:

Pollutant	Baseline Actual Emissions (tons/year)	Baseline Actual Emissions* 5/04 – 4/06 (tons/year)	Projected Actual Emissions** (tons/year)	Net Change (tons/year)	Significance Level (tons/year)
PM, PM ₁₀ , PM _{2.5}	From No. 4 PM: 6.5	204.6	213.6 (cap)***	+ 9.0	25, 15, 10
	From No. 9 PB: 198.1				
SO ₂	From No. 4 PM: 0	0.0	0.6	+ 0.6	40
NO _x	From No. 4 PM: 0	0.0	39.6	+ 39.6	40
CO	From No. 4 PM: 0	0.0	43.6	+ 43.6	100
VOC	From No. 4 PM: 4.5	20.5	59.5 (cap)***	+ 39.0	40
	From No. 9 PB: 16.0				
CO ₂ e	From No. 4 PM: 0	0.0	61,835.29	+ 61,835.29	75,000

* Baseline Actual Emissions values for PM, PM₁₀, PM_{2.5}, and VOC are the combined emissions from the No.9 Power Boiler and the No. 4 Paper Machine.

** Projected Actual Emissions values for PM, PM₁₀, PM_{2.5}, and VOC are the combined emissions from the No. 9 Power Boiler and the two new Tissue Machines.

*** Combined emission limit for two new Tissue Machines and No. 9 Power Boiler

Note: The above numbers are for the No. 9 Power Boiler, the No. 4 Paper Machine, and the two new LDC Tissue Machines only. No other equipment at the facility is affected by this license.

This NSR license is determined to be a minor modification to the source under *Minor and Major Source Air Emission License Regulations* 06-096 CMR 115 (as amended) based on the following findings:

- The changes being made are not addressed or prohibited in the existing Part 70 air emission license.
- No net change in tons per year emissions for any pollutant will exceed the significance level, as demonstrated above.

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.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 CMR 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Best Available Control Technology (BACT)

The following is a summary of the BACT determination for the two new Tissue Machines, by pollutant.

1. Particulate Matter (PM, PM₁₀, & PM_{2.5})

Wet end and dry end vent gases from paper machines often contain PM. The quantity of PM is difficult to measure due to the low PM concentrations and high exhaust gas flow rates, and the particle size is difficult to discern due to entrained water vapor. PM emissions from the dry end of tissue machines are generally higher than PM emissions from paper machines due to the doctor blade used to separate the tissue sheet from the Yankee drum. PM emissions from the tissue machines also include emissions generated from the dryer hood burners firing natural gas. Potential control technologies for PM emissions include add-on control equipment, combustion of clean fuels, and good combustion practices.

Add-on control for the control of PM emissions includes baghouses, cyclones, wet scrubbers, and electrostatic precipitators (ESPs). Due to the high moisture loading of tissue machine exhaust and ventilation streams, baghouses are not technically feasible for this application. A review of relevant BACT precedents identified multiple tissue machines using venturi scrubbers to control dry end PM emissions. The use of a wet scrubber to control PM emissions from the new tissue machines is a technically feasible option, but

the specific technology employed will ultimately depend on the tissue machine manufacturer selected for the project and the corresponding specifics of the units.

The facility has proposed and the Department concurs that using a PM control technology to be determined based on the manufacturer chosen for the project, the combustion of natural gas, and good combustion practices to limit combined PM emissions from the two tissue machines to 8.2 lb/hour (0.52 lb/ADTFP) represents BACT for the two new LDC Tissue Machines.

General Process Source Particulate Emission Standard, 06-096 CMR 105, contains an applicable PM emission limit of 15.35 lb/hour for the Tissue Machine and associated dryers, calculated using a process weight of 10.42 tons/hour (equivalent to 250 tons/day, assuming 24-hour/day operation of the Tissue Machine and associated dryers) and the equation found in 06-096 CMR 105.

Because the primary purpose of fuel burning in the Tissue Machine and associated dryers is not to produce heat and power, from the definition of "fuel-burning equipment" as found in 06-096 CMR 100, *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 particulate emission limits do not apply to this unit.

2. Sulfur Dioxide (SO₂)

Emissions of SO₂ from the tissue machines are attributable to the oxidation of sulfur compounds contained in the natural gas used to generate hot air in the dryer hoods. Control options to reduce emissions of SO₂ include flue gas desulfurization through use of a wet scrubber or restricting the sulfur content of the fuel. The costs of a wet scrubbing system for a relatively small natural gas combustion source, including the associated annual operating costs for the scrubbing media, energy, operation, and maintenance render this option as economically infeasible.

The facility proposes and the Department concurs that the use of natural gas and a combined SO₂ emission limit from both tissue machines of 0.14 lb/hour represents BACT for SO₂ emissions from the two tissue machines.

3. Nitrogen Oxides (NO_x)

Emissions of NO_x from the Tissue Machine are attributable to the oxidation of nitrogen in the combustion air and of nitrogen compounds contained in the natural gas used to generate hot air in the dryer section of the machine. Options for controlling NO_x emissions from the unit include combustion

control techniques, add-on controls such as selective catalytic reduction (SCR) and selective non-catalytic reduction (SNCR), and the combustion of clean fuel.

The add-on control options of SNCR and SCR are primarily used on large industrial and utility boilers. A review of relevant BACT precedents did not indicate any tissue machines using an add-on technology for NO_x control. The costs of installing add-on controls, annual operating costs, added energy consumption, and operation and maintenance costs render this option economically infeasible.

NO_x can be controlled through combustion practices including low excess air firing and burner modification. Additional pollution control options include flue gas recirculation (FGR) and low-NO_x burners. In an FGR system, a portion of the flue gas is recirculated back into the main combustion chamber, reducing thermal NO_x formation by decreasing the peak flame temperatures. Typically, ductwork is run from the burner outlet duct to the combustion air duct. Low-NO_x burners are typically utilized on medium-to-large industrial and utility boilers. A review of relevant BACT precedents did not identify any tissue machines using FGR to control NO_x emissions from the burner hoods. Additionally, the costs of installing, operating, and maintaining a FGR system is not economically feasible.

Low-NO_x burners are both technically and economically feasible, and Woodland Pulp proposes the use of this combustion control practice as BACT. Combined with this technology, the facility will burn natural gas, which has low nitrogen content. The facility proposed to limit combined NO_x emissions from both tissue machines to 9.04 lb/hour as BACT, based on emission data provided by a potential tissue machine manufacturer.

The Department finds the use of low NO_x burners firing natural gas and a combined NO_x emission limit from both tissue machines of 9.04 lb/hour to be BACT for for NO_x emissions from the two Tissue Machines.

4. Carbon Monoxide (CO)

The formation of CO occurs as a result of incomplete combustion of organic compounds contained in the natural gas used to generate hot air in the dryer hood.

Based on the relatively small size of the fuel combustion source, it is not economically feasible to install add-on pollution control equipment to control CO from these units. No CO emissions control technologies were identified that are technically feasible for application to these units, but several sources

identified good combustion practices as BACT. Such practices include maintaining the air-to-fuel ratio at the manufacturer's specified setting and proper air and fuel pressures at the burner.

The Department finds that using good combustion practices and the limit of combined CO emissions of 9.95 lb/hour, based on the ton/year testing data provided by the manufacturer and assuming 8,760 hours/year of operation, represent BACT for CO emissions from the new Tissue Machines.

5. Volatile Organic Compounds (VOC)

Emissions of VOCs from the Tissue Machine can be attributed to many different sources. VOCs are present in the water carrying the pulp to the tissue machine and can be released as the water is removed from the sheet. The most often detected compound is methanol, a byproduct of chemical and mechanical pulping and bleaching processes. VOCs are sometimes present in papermaking additives, such as defoamers, slimicides, retention aids, wet strength agents, wire and felt cleaners, etc. and can be released in the papermaking process. Paper machines with direct-fired dryers, such as the two LDC Machines, also emit VOCs from the combustion of the fuel.

Add-on controls for emissions of VOCs from paper machine vents are not economically feasible because of the small pollutant concentrations, the high moisture content, and the high volume of the vent exhaust gases. A review of recent BACT determinations for similar units did identify several emission sources required to track paper machine chemical use and to use low VOC alternatives when practicable. Because there are no existing, technically feasible control technology alternatives, Woodland Pulp proposed the use of good combustion practices, limiting the VOC content of wet-end additives when possible, and a target limit of 6.87 lb/hour (0.44 lb/ADTFP) as BACT for these units. Because of the uncertainties as previously specified in the basis for this limit, the facility will track and record tissue machine chemical usage and the VOC content of all chemicals used, to develop a more accurate and site-specific estimate of VOC emissions from the tissue machines. Compliance with the annual cap of combined VOC emissions from the two Tissue Machines and the No. 9 Power Boiler shall be maintained at all times.

Based on the above information, the Department finds that minimizing the VOC content of papermaking additives and using good combustion practices with a limit of 6.87 lb/hour constitutes BACT for VOC emissions from the two new Tissue Machines with associated dryers firing natural gas.

6. Greenhouse Gases (GHG)

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 CFR Part 52, Subpart A, §52.21 Prevention of Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, GHG are calculated and reported as carbon dioxide equivalents (CO₂e).

As defined in 06-096 CMR 100 (as amended), the aggregate group of gases known as GHG are a regulated pollutant, except that for the purposes of 06-096 CMR 115 and 06-096 CMR 140, GHG are regulated pollutants only for the purposes of major New Source Review involving significant emissions of GHGs and Part 70 major source requirements. [06-096 CMR 100 (149)(H)] Because the net change in GHG emissions resulting from this project, calculated and reported as carbon dioxide equivalents (CO₂e), is less than the significant emissions level, GHG are not subject to BACT requirements for this project.

C. Emission Limits

The BACT emission limits for the two Tissue Machines and associated dryers firing natural gas are the following:

PM lb/hr	PM ₁₀ lb/hr	PM _{2.5} lb/hr	SO ₂ lb/hr	NO _x lb/hr	CO lb/hr	VOC lb/hr
8.20	8.20	8.20	0.14	9.04	9.95	6.87

Visible emissions from the two Tissue Machines and associated fuel burning equipment shall not exceed 10% opacity on a six-minute block average basis, except for no more than one six-minute block average in a continuous three-hour period. [06-096 CMR 101]

D. Cap Compliance Documentation

Woodland Pulp shall maintain records on a monthly basis demonstrating the combined 12-month rolling total of emissions from the two LDC Tissue Machines and the No. 9 Power Boiler do not exceed the licensed caps. Because the facility recently completed a fuel conversion project on No. 9 Power Boiler equipping it to burn natural gas, Woodland Pulp does not expect the emission caps to interfere with normal plant operations and shall maintain compliance with these caps at all times.

Woodland Pulp shall use the following compliance calculation methodologies to demonstrate compliance with the specified emission caps:

1. PM, PM₁₀, and PM_{2.5} Emissions from the Two New Tissue Machines and No. 9 Power Boiler

Monthly values shall be calculated using the following data and factors:

$$\left(\begin{array}{l} \text{Monthly heat input} \\ \text{from all combined} \\ \text{fuels, including gas,} \\ \text{oil, hog fuel, into No.} \\ \text{9 Power Boiler} \end{array} \right) \times \left(\begin{array}{l} \text{Site-specific source} \\ \text{testing factor for PM} \\ \text{(lb PM/MMBtu)} \end{array} \right) + \left(\begin{array}{l} \text{monthly production} \\ \text{rate of tissue} \\ \text{machines (ADTFPM)} \end{array} \right) \times 0.52 \text{ lb/ADTFP*} = \text{monthly total}$$

* BACT PM emission estimate based on data provided by the likely equipment supplier. Upon written authorization, the Department may allow the use of an alternate emission factor in such instances as new emission data is provided by the selected tissue machine manufacturer or testing is conducted.

The 12-month rolling total shall not exceed 213.6 tons/year PM emissions.

2. VOC Emissions from the Two New Tissue Machines and No. 9 Power Boiler
 Monthly values shall be calculated using the following data and factors:

$$\left(\begin{array}{l} \text{Monthly gas used} \\ \text{in No. 9 Power} \\ \text{Boiler (MMscf)} \end{array} \right) \times \left(\begin{array}{l} \text{AP-42 emission factor} \\ \text{for VOC from natural} \\ \text{gas combustion (5.5} \\ \text{lb/MMscf) or site-} \\ \text{specific source testing} \\ \text{factor} \end{array} \right) + \left(\begin{array}{l} \text{Monthly fuel oil} \\ \text{used in No. 9} \\ \text{Power Boiler} \\ \text{(1000 gallons)} \end{array} \right) \times \left(\begin{array}{l} \text{AP-42 emission factor} \\ \text{for VOC from No. 6 fuel} \\ \text{oil combustion (0.76} \\ \text{lb/1000 gal) or site-} \\ \text{specific source testing} \\ \text{factor} \end{array} \right) +$$

$$\left(\begin{array}{l} \text{Monthly hog fuel} \\ \text{used in No. 9} \\ \text{Power Boiler} \\ \text{(MMBtu)} \end{array} \right) \times \left(\begin{array}{l} \text{AP-42 emission factor} \\ \text{for VOC from biomass} \\ \text{combustion} \\ \text{(0.017 lb/MMBtu) or} \\ \text{site-specific source} \\ \text{testing factor} \end{array} \right) + \left(\begin{array}{l} \text{Monthly production} \\ \text{rate of tissue} \\ \text{machines (ADTFP)} \end{array} \right) \times \left(\begin{array}{l} \text{Woodland emission} \\ \text{factor for VOC from} \\ \text{tissue machines (to be} \\ \text{determined based on} \\ \text{VOC recordkeeping)} \end{array} \right) = \text{monthly total}$$

The 12-month rolling total shall not exceed 59.5 tons/year VOC emissions.

E. Incorporation into the Part 70 Air Emission License

The requirements in this 06-096 CMR 115 New Source Review license shall apply to the facility upon startup of the new Tissue Machines. Per *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended), Section 1(C)(8), for a modification at a source that has undergone NSR requirements or been processed through 06-096 CMR 115, the source must apply, within one year of commencing the proposed operations, for an amendment to the Part 70 license to include the NSR license requirements, as provided in 40 CFR Part 70.5.

F. Annual Emissions

Woodland Pulp shall be restricted to the following annual emissions, based on a 12-month rolling total.

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

	PM	PM₁₀	SO₂	NO_x	CO	VOC	TRS
Tissue Machines	--	--	0.6	39.6	43.6	--	--
Tissue Machines and No. 9 Power Boiler Combined	213.6	213.6	--	--	--	59.5	--
No. 9 Power Boiler	--	--	676	780	5008	--	--
#3 Recovery Boiler	189	189	1567	601	983	176	--
Smelt Dissolving Tank	50	50	--	--	--	--	13.6
Lime Kiln	87	87	35	175	1750	--	--
Package Boiler	56	56	9.9	5.6	1.4	0.1	--
NCG Incinerator	8.4	8.4	12.7	39.6	2.8	0.2	--
TOTALS	604.0	604.0	2301.2	1178.0^c	7788.8	235.8	13.6

- a Emissions limits in the table do not include insignificant activities and process units (e.g. woodyard) which have no licensed emission limits.
- b PM₁₀, CO, and TRS are not used in the calculation of the annual fee but are included in this table for completeness.
- c Note that the total NO_x limit for the mill is less than total allowable emissions from individual units. Woodland Pulp may emit up to each required limit for any one individual unit, provided that the total of all units does not exceed the mill wide total of 1178.0 ton/year on a 12-month rolling total basis. See License A-215-70-I-R/A, Condition (17), issued November 18, 2011.

III. AMBIENT AIR QUALITY ANALYSIS

Woodland Pulp previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (License A-215-71-AC-A, dated October 6, 1999). An additional ambient air quality analysis is not required for this minor modification.

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 Air Emission License A-215-77-6-A pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the standard and special 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

The following Specific Conditions supersede the Specific Conditions found in NSR Air Emission License A-215-77-5-A (dated August 7, 2012).

(1) Tissue Machines

- A. Woodland Pulp is licensed to replace the No. 4 Paper Machine with two new light dry crepe (LDC) Tissue Machines, with production capacity for each unit of approximately 187 air-dried tons of finished product per day (ADTFPD). In addition to the Yankee dryer heated by steam provided by the existing steam plant, each tissue machine shall utilize direct-fired natural gas burners to provide hot air in the hood. The natural gas burners shall have a combined heat input capacity of approximately 120 MMBtu/hour for the two machines.
- B. Emissions from the Tissue Machines and associated dryers shall not exceed the following [06-096 CMR 115, BACT]:

PM lb/hr	PM₁₀ lb/hr	PM_{2.5} lb/hr	SO₂ lb/hr	NO_x lb/hr	CO lb/hr	VOC lb/hr
8.20	8.20	8.20	0.14	9.04	9.95	6.87

- C. Visible emissions from the two Tissue Machines and associated fuel burning equipment shall not exceed 10% opacity on a six-minute block average basis, except for no more than one six-minute block average in a continuous three-hour period. [06-096 CMR 101]

Woodland Pulp LLC
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Departmental
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(2) **Tissue Machines & No. 9 Power Boiler Combined Emissions Cap Compliance**

Woodland Pulp shall maintain records on a monthly basis demonstrating that the 12-month rolling total of combined emissions from the Tissue Machines and the No. 9 Power Boiler do not exceed the following licensed caps:

Combined Emissions from the Two New Tissue Machines and No. 9 Power Boiler

<u>Pollutant</u>	<u>Limit, tons/year</u>
PM	213.6
VOC	59.5

These combined emissions limits from the Tissue Machines and No. 9 Power Boiler shall become effective upon start-up of the Tissue Machines.

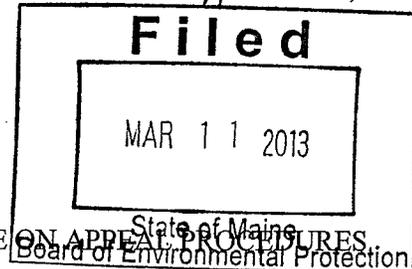
Compliance shall be documented through recordkeeping and calculations utilizing the following, as appropriate: production data, fuel use data, and factors from NCASI, AP-42, and stack test results, as outlined in the Findings of Fact of this NSR license and as approved by the Department.

- (3) Woodland Pulp shall submit an application to incorporate this amendment into the Part 70 air emission license no later than 12 months from commencement of the requested operation. [06-096 CMR 140, Section 1(C)(8)]

DONE AND DATED IN AUGUSTA, MAINE THIS 8 DAY OF March, 2013.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marie Allen Robert Core for
PATRICIA W. AHO, COMMISSIONER



PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES.

Date of initial receipt of application: February 1, 2013

Date of application acceptance: February 1, 2013

Date filed with the Board of Environmental Protection:

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

