



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE  
GOVERNOR

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COMMISSIONER

<b>Woodland Pulp LLC</b>	)	<b>Department</b>
<b>Washington County</b>	)	<b>Findings of Fact and Order</b>
<b>Baileyville Maine</b>	)	<b>Part 70 Air Emission License</b>
<b>A-215-70-I-R/A</b>	)	<b>Renewal</b>

After review of the Part 70 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 (WPLLC)
LICENSE NUMBER	A-215-70-I-R/A
LICENSE TYPE	Part 70 License Renewal
NAICS CODES	322122
NATURE OF BUSINESS	Pulp Manufacturing
FACILITY LOCATION	Baileyville, Maine
DATE OF LICENSE ISSUANCE	November 18, 2011
LICENSE EXPIRATION DATE	November 18, 2016

B. Emission Equipment

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

Emission Unit ID	Unit Capacity	Primary Fuels/Raw Materials/Gas Streams
Power Boiler #9	740 MMBtu/hr	Biomass #6 fuel oil Sludge Tire Derived Fuel Specification Waste Oil HVLC-High Vol., Low Conc. Gases LVHC-Low Vol., High Conc. Gases General Mill Yard Waste Oily Rags, Absorbent Material Stripper Off Gas Propane Natural Gas

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#3 Recovery Boiler	1207 MMBtu/hr	Black Liquor #6 Fuel Oil, Propane Natural Gas
Package Boiler	≤ 77.3 MMBtu/hr	#2 Fuel Oil, Diesel Fuel
Smelt Dissolving Tank	N/A	Smelt, Weak Wash, and Fresh Water
Continuous Kamyrdigester	N/A	Wood Chips
Multiple Effect Evaporator System	N/A	Weak Black Liquor
Brownstock Washer System	N/A	Brownstock Pulp
Pressure Diffusion Washer System	N/A	Brownstock Pulp
Black Liquor Storage System	N/A	Weak and Strong Black Liquor
Bleach Plant/Chlorine Dioxide Generation System	N/A	Unbleached Pulp, ClO <sub>2</sub> , NaOH, O <sub>2</sub> , Hydrogen Peroxide
R <sub>8</sub> /R <sub>10</sub> ClO <sub>2</sub> Generation Plant	N/A	Methanol, Sodium Chlorate, Sulfuric Acid
Lime Slakers (2)	N/A	Green Liquor, Lime (CaO), Weak Wash
Lime Kiln	75 MMBtu/hr	#6 Fuel Oil, Propane, Natural Gas
Fresh Lime Silo	N/A	Lime (CaO)
Reburned Lime Silo	N/A	Reburned Lime
Pulp Dryer	N/A	Bleached Pulp Slurry
Chip Thickness Screening Dust Collection System	N/A	Wood Dust
Old Screen Room Dust Collection System/Rotatory Drum Screen	N/A	Wood Dust
Condensate Steam Stripper	N/A	Foul Condensate
NCG Incinerator	20 MMBtu/hr	NCG (Non-Condensable Gases), Stripper Off-gas, Propane
#6 Fuel Oil Storage System	2,100,000 gal	#6 Fuel Oil
Fuel Oil Storage System	374,000 gal	Fuel Oil
Methanol Storage Tank	19,600 gal	Methanol
LVHC NCG Collection System	N/A	LVHC NCG
HVLC NCG Collection System	N/A	HVLC NCG

The descriptions above are nominal capacities and do not represent limits. Production capacities within the Findings of Fact of this License are referenced for the purposes of description only. Capacities that are determined to be a specific licensed limit are listed as such within the Order section of this License.

WPLLC has additional insignificant activities which do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (last amended December 24, 2005).

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C. Application Classification

WPLLC was issued a New Source Review (NSR) permit A-215-77-4-A on July 13, 2011, to allow them to fire Natural Gas in its fuel burning units. This NSR permit is being incorporated into this Part 70 renewal.

**II. EMISSION UNIT DESCRIPTION**

A. Process Description

WPLLC's Woodland Pulp facility is a semi-integrated pulp mill. Wood chips are delivered from an adjacent chipping facility as well as brought to the mill via trucks. Wood chips are unloaded and then screened in the woodyard. Acceptable chips are fed into the digester's steaming vessel, which purges air from the chips. The chips and white liquor are then fed into the digester, which subjects the chips to high temperature and pressure alkaline cooking in order to dissolve the lignin that holds the fibers together. After leaving the digester, softened chips are fed to a flash tank where they are subjected to a pressure drop, allowing the wood fibers to be separated from the now dissolved lignin. The fibers are then sent to the Pressure Diffusion Washer and the Brownstock Washing System in the form of brownstock pulp where residual liquor is removed from the pulp and spent pulping chemicals are recovered. The washed brownstock pulp is then sent through brownstock storage and then to the bleaching process. The bleached pulp is then sent to the pulp dryer.

The residual black liquor from the digester undergoes a series of concentration steps via evaporation, after which it is burned in the #3 Recovery Boiler. The resulting smelt from the Recovery Boiler is dissolved in weak wash or water in the Smelt Dissolving Tank, where it forms green liquor. The green liquor is then reacted with lime in the Lime Kiln to form white liquor, which is used again in the digester thus completing the "liquor cycle".

The Mill also operates support facilities including woodyards, wastewater treatment plant, sludge press, pulp production labs, environmental labs, finishing/shipping/receiving operations, storage areas, a landfill, power boiler and two steam turbines.

B. 40 CFR Part 63, Subpart S (Pulp and Paper MACT)

WPLLC is subject to Subpart S due to the facility's kraft pulping processes and the use of wood as a raw material.

a. LVHC System (Low Volume High Concentration)

In accordance with 40 CFR, §63.443 WPLLC captures and controls Hazardous Air Pollutants (HAP's) from the LVHC system, which includes the digester, steam stripper, and evaporator systems. The LVHC system

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gases are incinerated in the #3 Recovery Boiler, #9 Power Boiler or the NCG Incinerator.

- b. HVLC System (High Volume Low Concentration)  
In accordance with 40 CFR Part 63, Subpart S, WPLLC is required to capture and control HAP's from the HVLC system, which includes the brown stock washers. The HVLC control system consists of collection and incineration of the HVLC gasses in the #3 Recovery Boiler or the #9 Power Boiler.
- c. Condensate Collection System  
WPLLC has elected to demonstrate compliance with the pulping condensate collection option listed in 40 CFR Part 63, §63.446(c)(3), which requires collection of pulping process condensates that contain a total HAP mass rate of 11.1 lb/ton of oven-dry pulp.

WPLLC uses a steam stripper to treat some of the pulping process condensate streams and sending the captured HAP's to either the #3 Recovery Boiler, #9 Power Boiler or the NCG Incinerator. The treatment of these condensate streams meets the requirements of 40 CFR, 63.446(e)(3), reducing or destroying the total HAPS by 92%, or 63.446(e)(5), removing 10.2 lb of HAPs per ton of oven-dry pulp, or achieving a total HAP concentration of 330 ppm or less at the outlet.

C. Total Reduced Sulfur (TRS)

*Total Reduced Sulfur Control From Kraft Mills*, 06-096 CMR 124 (last amended September 26, 1995) requires control of TRS compounds from various pulping processes and condensate systems at the facility. In some instances, these control requirements overlap with the control requirements for HAPs per 40 CFR Part 63, Subpart S.

06-096 CMR 124 requires the use of the current LVHC system to control TRS from the digester system, evaporator systems, and the steam stripper. The LVHC system is controlled by the #3 Recovery Boiler, #9 Power Boiler or the NCG Incinerator. 06-096 CMR 124 requires the use of an HVLC system to control TRS from the brownstock washer systems. The Thickener (Decker) wash water has been replaced from clean combined condensate to fresh hot water, thus eliminating the need for collection and control of these gases.

D. #9 Power Boiler

The #9 Power Boiler was manufactured by Babcock & Wilcox with a nominal design heat input of 740 MMBtu/hr except as follows: The boiler has a licensed heat input of 625 MMBtu/hr on a 24-hr basis. The boiler may fire up to 740 MMBtu/hr when #3 Recovery Boiler is offline or in a period of startup or

shutdown, and the pulp mill and the pulp dryer are on-line. The boiler was installed in 1971, prior to the New Source Performance Standards (NSPS) subpart D or Db applicability dates. A wet scrubber was installed on the boiler in 1979. The boiler is used to supply energy to the manufacturing process. Emissions exit through a 225 ft Above Ground Level (AGL) stack. The #9 Power Boiler is currently licensed to fire primarily #6 fuel oil, and Biomass (including wood chips, bark, wood waste, waste paper, cardboard, cores, and sludge), but is also licensed to fire TDF (Tire Derived Fuel), specification waste oil, LVHC and HVLC system gases, Stripper Off-gases, general mill yard waste, oily rags and absorbent materials and propane.

NSR permit A-215-77-4-A allows the #9 Power Boiler to fire Natural Gas as a replacement for #6 Fuel Oil. #9 Power Boiler shall still be permitted to fire #6 Fuel Oil in the event Natural Gas becomes unavailable. When firing only natural gas in the #9 Power Boiler, WPLLC is not required to operate the wet scrubber system.

The #9 Power Boiler is considered “on line” if any fuel is being combusted in the boiler and the boiler has achieved its design operating pressure of 850 psi.

The #9 Power Boiler was subject to a RACT Determination in 1986 as the WPLLC facility was in a non-attainment area for Particulate Matter (PM). This area has subsequently been classified as in attainment. The EPA has allowed emission limit alterations based on the re-designation of an attainment area as long as any relaxed emission limit will not interfere with the maintenance of the National Ambient Air Quality Standards nor any applicable air quality increment. WPLLC has therefore requested that the PM emission limits for #9 Power Boiler be altered from 0.15 lb/MMBtu to 0.22 lb/MMBtu and 84.4 lb/hr which results in a 10% reduction in lb/hr emission from the current limit of 93.8 lb/hr. The Department therefore finds that this change meets BPT for the #9 Power Boiler PM emission limits as detailed in the Streamlining section.

**BART Requirements**

#9 Power Boiler is considered an eligible unit for Best Available Retrofit Technology (BART) as defined in the Regional Haze Rule 40 CFR, Part 51. The BART determination for #9 Power Boiler was established in A-215-77-2-A and is summarized below:

1. PM - operation of a wet scrubber and compliance with an emission limit of 0.22 lb/MMBtu. WPLLC is already required to meet this limit per this Part 70 Air Emission License. No further action is required.
2. SO<sub>2</sub> - operation of a wet scrubber to achieve a compliance limit of 0.30 lb/MMBtu, based on a 24 hour average.
3. NO<sub>x</sub> - use of Low NO<sub>x</sub> Burners, good combustion practices, and compliance with an emission limit of 0.4 lb/MMBtu based on a 24 hour

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average. WPLLC is already required to meet this limit per this Part 70 Air Emission License. No further action is required.

Streamlining

1. Opacity  
*Visible Emission Regulation, 06-096 CRM 101 (as amended), Section 2(B)(1) and Section 3 contain the only applicable Opacity standard for the #9 Power Boiler Stack.*  
**No streamlining is required.**
2. Particulate Matter (PM)
  - a. WPLLC accepts streamlining for PM requirements. BART and Fuel Burning Equipment Particulate Emission Standard, *06-096 CMR 103 (as amended)*, section 2(A)(3)(b) are applicable to the #9 Power Boiler. The BART PM emission limit of 0.22 lb/MMBtu is more stringent than 06-096 CMR 103 and shall be considered the only BPT emission limit.
  - b. BPT establishes the only applicable PM lb/hr emission limit of 84.4 lb/hr.  
**No streamlining is required.**
3. PM<sub>10</sub>  
BPT establishes the only applicable PM<sub>10</sub> lb/hr emission limit.  
**No streamlining is required.**
4. Sulfur Dioxide
  - a. WPLLC accepts streamlining for sulfur dioxide requirements. BART and Low Sulfur *Fuel, 06-096 CMR 106 (as amended)*, section 4(B) (Flue Gas Desulfurization) are applicable for #9 Power Boiler. The BART limit of 0.30 lb SO<sub>2</sub>/MMBtu is more stringent than 06-096 CMR 106 (as amended). Therefore, only the more stringent BART sulfur dioxide limit is included in this license.
  - b. BPT establishes the only applicable SO<sub>2</sub> lb/hr emission limit.  
**No streamlining is required.**
5. NO<sub>x</sub>
  - a. A NO<sub>x</sub> RACT emission limit of 0.40 lb/MMBtu applies pursuant to *Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides, 06-096 CMR 138 (as amended)*, section 4(3), and the emission averaging provisions in section 3(1). Compliance with the NO<sub>x</sub> RACT requirements also satisfies the requirements of BART.  
**No streamlining is required**
  - b. BPT establishes the only applicable NO<sub>x</sub> lb/hr emission limits.  
**No streamlining is required**

6. CO
  - a. BPT establishes the only applicable CO lb/MMBtu emission limit.  
**No streamlining is required**
  - b. BPT establishes the only applicable CO lb/hr emission limit.  
**No streamlining is required**
  
7. Volatile Organic Compounds (VOC)
  - a. BPT establishes the only applicable VOC lb/MMBtu emission limit.  
**No streamlining is required.**
  - b. BPT establishes the only applicable VOC lb/hr emission limit.  
**No streamlining is required.**

Periodic Monitors

Periodic monitoring for the #9 Power Boiler shall consist of the following:

Items to be Monitored	Record	Average
Scrubber Pressure Drop	Every 15 min	3 hr avg every three hours
Scrubber media make-up flow	Every 15 min	3 hr avg every three hours
Scrubber media recycle flow	Every 15 min	3 hr avg every three hours

WPLLC shall test the #9 Power Boiler for PM every calendar year in accordance with 40 CFR, Part 60, Appendix A, Method 5.

Based on best management practices and the type of fuel for which #9 Power Boiler was designed, it is unlikely that #9 Power Boiler will exceed the emission limits for CO and VOC. Therefore, periodic monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting the Mill to perform testing and may take enforcement action for any violation discovered.

Parameter Monitors

There are no parameter monitors required for the #9 Power Boiler.

CEMS

Continuous Emission Monitoring Systems, subject to Source Surveillance, *06-096 CMR 117 (as amended)*, for #9 Power Boiler, shall be operated for SO<sub>2</sub>, NO<sub>x</sub>, and O<sub>2</sub> on a ppm basis, and stack flow on a cubic feet per minute (cfm) basis.

Control Equipment

PM and SO<sub>2</sub> emissions from the #9 Power Boiler are controlled through the use of a mulitclone and a variable-throat wet venturi scrubber.

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E. Compliance Assurance Monitoring (CAM)

40 CFR Part 64 requires that a major source required to obtain a Part 70 Air License submit a Compliance Assurance Monitoring plan for each unit at the source subject to an emission limit that uses a control device to achieve compliance with the emission limit and that has potential to emit the pollutant prior to control at or above major source levels. The only pollutant at WPLLC that is subject to CAM is the PM emitted from the #9 Power Boiler. CAM for the #9 Power Boiler shall consist of the following:

**PM CAM:**

	<b>Indicator</b>
<b>Indicators</b>	Scrubber Pressure Drop Scrubber Media Recycle Flow Rate
<b>General Criteria</b>	
Measurement Method	Magnetic flow meters, Pressure drop indicators
Indicator Ranges	Scrubber Pressure Drop - TBD Scrubber Media Recycle Flow Rate – TBD  Indicator ranges shall be determined within 180 days of the issuance of this Part 70 License. Indicator ranges shall be established based on manufacturer's recommendations, operational control experience, and stack testing results.  Excursions shall consist of any 3-hour block average outside the established indicator ranges. WPLLC shall take immediate corrective action in response to an excursion.
<b>Performance Criteria</b>	
Data Representativeness and QA/QC	Media Flow Meters shall be calibrated, maintained, and operated according to manufacturer's specifications.
Monitoring Frequency	Record indicator data every 15 minutes. Average indicator data every 3 hours.
Data Collection Procedure	Data shall be recorded and stored electronically.

F. #3 Recovery Boiler

The #3 Recovery Boiler is a Gotaverken single drum boiler nominally rated at 1207 MMBtu/hr. The unit was manufactured and installed in 1988, has fifteen burners, and fires black liquor (4 burners) and #6 fuel oil (11 burners). Each burner can utilize a propane/natural gas igniter. Installation of the #3 Recovery Boiler (and Smelt Tank) was permitted pursuant to Prevention of Significant Deterioration (PSD) permitting requirements. When firing oil, the boiler is subject to NSPS, 40 CFR Part 60, Subpart Db for steam generating units greater than 100 MMBtu/hr and manufactured after June 19<sup>th</sup>, 1984. The #3 Recovery Boiler is not subject to 40 CFR, Part 60, Subpart D or the NO<sub>x</sub> limits of 40 CFR, Part 60, Subpart Db because the annual capacity factor for oil is limited to less than 10%. The #3 Recovery Boiler is also subject to 40 CFR, Part 60, Subpart A,

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General NSPS Provisions; Subpart BB, NSPS for Kraft Mills; and 40 CFR, Part 63, Subpart MM, NESHAP for Chemical Recovery at Kraft Pulp Mills.

The #3 Recovery Boiler is capable of firing black liquor (from the Digester System as well as imported black liquor) either alone or in combination with #6 fuel oil. The #6 fuel oil is used to start the combustion of black liquor, and to stabilize the black liquor firing. The boiler is equipped with a dry ESP manufactured by ABB Flakt to control PM emissions.

NSR permit A-215-77-4-A allows the #3 Recovery Boiler to fire Natural Gas as a replacement for #6 Fuel Oil. The #3 Recovery Boiler shall still be permitted to fire #6 Fuel Oil in the event Natural Gas becomes unavailable. When firing only natural gas in the #3 Recovery Boiler, WPLLC is not required to operate the ESP system.

The #3 Recovery Boiler is considered “on line” if any fuel is being combusted in the boiler and the boiler has achieved its design operating steam pressure.

#### Streamlining

##### 1. Opacity

WPLLC accepts streamlining for opacity requirements. 06-096 CMR 101 (as amended), Section 2(B)(2) and 40 CFR, Part 60, Subpart BB requirements are applicable. Only the more stringent 06-096 CMR 101 requirements are included in this license.

##### 2. PM and PM<sub>10</sub>

a. WPLLC accepts streamlining for the PM requirement. *General Process Source Particulate Emission Standard*, 06-096 CMR 105 (as amended), Section 2 and previously established LAER limits are applicable. WPLLC was subject to LAER (Lowest Achievable Emission Rate) (A-215-71-B-A/R) in 1989. 40 CFR, Part 63, Subpart MM took effect March 13, 2004. The LAER PM limit is more stringent than the PM requirement put forth in Subpart MM. Only the more stringent LAER requirement is included in this license.

b. LAER establishes the only applicable PM and PM<sub>10</sub> lb/hr emission limits. **No streamlining is required.**

##### 3. Sulfur Dioxide

a. WPLLC accepts streamlining for SO<sub>2</sub> requirements. WPLLC was subject to BACT (A-215-71-B-A/R) in 1989. 06-096 CMR 106 and 40 CFR, Part 60, subsection Db, 60.42b are also applicable. SO<sub>2</sub> requirements for this license are split between a combination of the most stringent requirements of each rule. WPLLC shall either fire low sulfur fuel oil (most stringent

part of 06-096 CMR 106), or shall meet an alternative lb/MMBtu limit (most stringent part of 60.42b).

- b. To operate more efficiently during startup and shutdown, an alternative SO<sub>2</sub> limit has been put into effect that allows a combined emission limit for #3 Recovery Boiler and #9 Power Boiler of 793.04 lb SO<sub>2</sub>/hr on a 3-hour block average basis. This limit can be used for no more than 300 hours per calendar year.

NO<sub>x</sub>

- a. 06-096 CMR 138, Section 3(C) contains the only applicable NO<sub>x</sub> ppm (24 hr block average) emission standard. The 06-096 CMR 138 standard is on a wet basis. The limit contained in this license is the equivalent of that standard converted to a dry basis. **No streamlining is required.**
- b. BACT (A-215-71-B-A/R) establishes the only applicable NO<sub>x</sub> lb/hr and ppm (30 day rolling average) emission limits. **No streamlining is required.**

CO

- a. WPLLC was subject to BACT (A-215-71-B-A/R) in 1989. BACT establishes the only applicable CO ppmv emission limit. **No streamlining is required.**
- b. BACT (A-215-71-B-A/R) establishes the only applicable CO lb/hr emission limit. **No streamlining is required.**

VOC

- a. BACT (A-215-71-B-A/R) establishes the only applicable VOC lb/hr emission limit. **No streamlining is required.**

Total Reduced Sulfur (TRS)

WPLLC accepts streamlining for TRS. 06-096 CMR 124, Section 3(H) and 5(c)(3)(a) and 40 CFR, section 60.283(a)(2) and 60.284(e)(1)(i) contain applicable TRS ppm emission limits. Only the more stringent 06-096 CMR 124 (3)(H) and (5)(c)(3)(a) limits are included in this License.

Periodic Monitoring

Periodic monitoring shall consist of record keeping that includes fuel use records and fuel analysis records. Periodic monitoring for #3 Recovery Boiler shall also consist of the following:

Item to be monitored	Record
Black liquor firing rate	24-hr average

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WPLLC shall stack test the #3 Recovery Boiler once during the life of this License for PM in accordance with 40 CFR, Part 60, Appendix A, Method 5

Based on best management practices and the type of fuel for which #3 Recovery Boiler was designed, it is unlikely that #3 Recovery Boiler will exceed the emission limits for VOC. Therefore, periodic monitoring by the source for this pollutant is not required. However, neither the EPA nor the State is precluded from requesting the Mill to perform testing and may take enforcement action for any violation discovered.

Parameter Monitors

There are no parameter monitors required for the #3 Recovery Boiler.

MACT CMS

MACT, 40 CFR, Part 63, Subpart MM contains an applicable requirement to operate a COMS to monitor opacity from the #3 Recovery Boiler. The MACT CMS shall be installed, operational, and data verified pursuant to 40 CFR, Part 63.8(c)(3). The COMS must be installed and operated in accordance with the requirements in 06-096 CMR 117 (as amended). In addition, WPLLC is required to operate the COMS to monitor opacity from the No. 3 Recovery Boiler pursuant to 40 C.F.R. Part 63, Subpart MM. As required by 40 C.F.R. Parts 63, Subparts A and MM, WPLLC conducted an initial performance evaluation on the COMS within 180 days of the Subpart MM compliance date of March 13, 2004. WPLLC may utilize the same COMS for demonstrating compliance with the existing opacity limit in Condition 15(N) of this license and the opacity limit set forth in 40 C.F.R. Part 63, Subpart MM.

CEMS and COMS

- a. Air Emission License A-215-71-B-A/R contains an applicable requirement to monitor percent Opacity, SO<sub>2</sub> ppm, NO<sub>x</sub> ppm, O<sub>2</sub> ppm, and TRS ppm emissions.
- b. 06-096 CMR 138 (as amended) contains an applicable requirement to monitor NO<sub>x</sub> ppm emissions.
- c. 06-096 CMR 124 (as amended) contains an applicable requirement to monitor TRS ppm emissions.
- d. 40 CFR, Part 60, Subpart BB contains an applicable requirement to monitor TRS ppm emissions.
- e. BPT establishes an applicable requirement to monitor CO ppm emissions.
- f. All CEMS and COMS listed above shall be operated in accordance with 06-096 CMR 117 (as amended).

Based on the above, WPLLC shall operate a CEMS which provides data to calculate NO<sub>x</sub> (lb/hr, ppm), SO<sub>2</sub> (lb/hr, ppm), O<sub>2</sub> ppm, and TRS ppm emissions from #3 Recovery Boiler. BPT establishes that WPLLC shall operate a CEMS to

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monitor CO ppm emissions from #3 Recovery Boiler. WPLLC shall operate a COMS to monitor opacity from the #3 Recovery Boiler.

Control Equipment

Control Equipment for the #3 Recovery Boiler consists of operating an ESP for particulate emissions control.

G. Smelt Dissolving Tank

The Smelt Dissolving Tank was installed in 1988 in conjunction with the installation of the #3 Recovery Boiler, and began operating in August 1989. During the combustion of black liquor in the #3 Recovery Boiler, the heating value of the lignin is released and the cooking chemicals are recovered as molten sodium salts referred to as smelt. The liquid smelt is extracted from the bottom of the boiler, and dissolved in water or weak wash in the smelt dissolving tank to form green liquor.

Particulate emissions and TRS from the Smelt Dissolving Tank are controlled by a Ducon dynamic fan wet scrubber, which uses weak wash or fresh water as the scrubbing medium. The Smelt Dissolving Tank is subject to 06-096 CMR 124, as well as NSPS, 40 CFR, Part 60, Subpart BB for Kraft Smelt Tanks manufactured after September 24<sup>th</sup>, 1976. Subpart BB and 06-096 CMR 124 (as amended) each require TRS emissions to meet a limit of 0.033 lb/ton of Black Liquor Solids (BLS) as H<sub>2</sub>S, and Subpart BB requires PM emissions to meet a limit of 0.20 lb/ton of BLS (dry weight). The Smelt Dissolving Tank is also subject to 40 CFR, Part 63, Subpart MM, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chemical Recovery Combustion Sources at Kraft Pulp Mills.

The Smelt Dissolving Tank is considered “operating” or “in operation” if any smelt is being drained into the dissolving tank on a sustained basis.

Streamlining

1. PM and PM<sub>10</sub>

- a. WPLLC accepts streamlining for Particulate Matter requirements. The Smelt Dissolving Tank is subject to 06-096 CMR 105, as well as 40 CFR, Part 60, Subpart BB and Part 63, Subpart MM. Subpart BB requires PM emissions to meet a limit of 0.20 lb/ton of BLS (dry weight). Subpart MM required that the concentration of PM in the exhaust gases discharged to the atmosphere meet a standard of 0.20 lb/ton of BLS fired. However, the LAER applied in 1989 (A-215-71-B-A/R) requires the Smelt Dissolving Tank to meet a more stringent PM limit of 0.127 lb/ton of BLS (dry weight). Only the more stringent LAER standard is listed in this license.

b. BACT (A-215-71-B-A/R) establishes the only applicable PM and PM<sub>10</sub> lb/hr emission limits.

**No streamlining is required.**

2. SO<sub>2</sub>

BACT (A-215-71-B-A/R) establishes the only applicable SO<sub>2</sub> lb/hr emission limit.

**No streamlining is required.**

3. TRS

06-096 CMR 124, Section 3(J) and 40 CFR, section 63.283(a)(4) contain identical TRS ppm emission standards. **No streamlining is required.**

Periodic monitoring

WPLLC shall stack test the Smelt Dissolving Tank every five calendar years for PM in accordance with 40 CFR, Part 60, Appendix A, Method 5, and every five calendar years for TRS in accordance with 40 CFR, Part 60, Appendix A.

MACT CMS

MACT, 40 CFR, Part 63, Subpart MM contains an applicable requirement to operate a CMS for the Smelt Tank Scrubber.

The MACT CMS for the Smelt Tank Scrubber shall consist of the following in accordance with Subpart MM. The MACT CMS shall be installed, operational, and data verified pursuant to 40 CFR, Part 60.8(c)(3):

Item to be monitored	Record	Average
Scrubber media flowrate	Every 15 min	3 hr block avg once every 3 hours
Scrubber pressure drop	Every 15 min	3 hr block avg once every 3 hours

The CMS parameter range shall be determined or modified as necessary, according to the procedures as specified in 40 CFR, Part 63.453(n).”

CEMS and COMS

There are no CEMS or COMS required to be operated for the Smelt Dissolving Tank.

Control Equipment

The Smelt Dissolving Tank is equipped with a Ducon dynamic fan wet scrubber to control particulate emissions. The scrubber uses weak wash or fresh water as the scrubbing media.

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H. Portable Package Boiler

A Portable Package Boiler is used for back-up steam production when the #9 Power Boiler is off-line. Based on modeling detailed in Air Emission License #A-215-71-E-A, a Portable Package Boiler can have a maximum heat input rating of 77.3 MMBtu/hr and must fire #2 fuel oil or Diesel Fuel. A Package Boiler shall not operate when the #9 Power Boiler is on-line. For the purposes of this license, "on-line" shall be defined as producing steam for production or heating use by the Mill. A Portable Package Boiler shall be limited to less than six weeks of operation per calendar year.

A Portable Package Boiler fires #2 fuel oil with a sulfur content not to exceed 0.25% by weight. Use of a Package Boiler shall be limited to 6 weeks per calendar year. WPLLC must maintain documentation sufficient to demonstrate compliance with this restriction. PM and PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub>, CO, and VOC emission rates are based on BACT emission factors. A Portable Package Boiler may be subject to 40 CFR, Part 60, Subparts A and Dc depending on the age of the unit used.

A Package Boiler has already been licensed pursuant to Maine's minor NSR provisions. Provided a Package Boiler meets the requirements in this license, including restriction of operation to less than 6 weeks per year and size restrictions on the boiler, temporary installation and use of a package boiler will not be subject to additional minor or major NSR licensing requirements under 06-096 CMR 115 (as amended) or 40 C.F.R. Part 51.

Streamlining

1. Opacity

06-096 CMR 101 establishes an applicable visible emission standard. In addition, 40 CFR, Part 60, Subpart Dc establishes an applicable visible emission standard if the boiler is subject to Subpart Dc. BACT (A-215-71-E-A) establishes that the Subpart Dc standard is the more stringent standard and shall be used in this License regardless of whether a Portable Package Boiler is subject to Subpart Dc.

2. PM and PM<sub>10</sub>

a. 06-096 CMR 103 (as amended) and BACT (A-215-71-E-A) establish identical PM lb/MMBtu emission standard.

b. BACT (A-215-71-E-A) establishes the only applicable PM lb/hr emission limit.

**No streamlining is required.**

c. BACT (A-215-71-E-A) establishes the only applicable PM<sub>10</sub> lb/hr emission limit.

**No streamlining is required.**

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3. SO<sub>2</sub>  
A BACT emission limit was established for SO<sub>2</sub> in Air Emission License # A-215-71-E-A, and is the only applicable SO<sub>2</sub> lb/hr emission limit included in this License. **No streamlining is required.**
  
4. NO<sub>x</sub>  
A BACT emission limit was established for NO<sub>x</sub> in Air Emission License # A-215-71-E-A, and is the only applicable NO<sub>x</sub> lb/hr emission limit included in this License. **No streamlining is required.**
  
5. CO  
A BACT emission limit was established for CO in Air Emission License # A-215-71-E-A, and is the only applicable CO lb/hr emission limit included in this License. **No streamlining is required.**
  
6. VOC  
A BACT emission limit was established for VOC in Air Emission License # A-215-71-E-A, and is the only applicable VOC lb/hr emission limit included in this License. **No streamlining is required.**

Periodic Monitoring

Periodic Monitoring shall consist of record keeping which demonstrates fuel use and firing rate of a Portable Package Boiler and delivery receipts or other records from the supplier indicating the percent sulfur by weight of the fuel oil.

Based on best management practices and the type of fuel for which a Portable Package Boiler was designed, it is unlikely that it will exceed emission limits for PM, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, and Opacity. Therefore periodic monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting WPLLC to perform testing, and may take enforcement action for any violations discovered.

Parameter Monitors

There are no Parameter Monitors required for a Portable Package Boiler.

CEMS and COMS

There are no CEMS or COMS required to be operated for a Portable Package Boiler.

Control Equipment

None

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I. Digester and Multiple Effect Evaporation System (MEE)

The Digester and Evaporation Systems consists of a continuous Kamyr (now Ahlstrom) digester and two multiple effect evaporator trains. The evaporator systems are used to increase the percent solids of the spent cooking liquor from the digester. The Digester and Evaporator Systems generate non-condensable gases (NCGs) and VOCs, which are collected and vented to the #3 Recovery Boiler, #9 Power Boiler or the backup NCG incinerator for incineration. The Digester system does not include the chip bin for purposes of 06-096 CMR 124 (as amended) or 40 CFR, Part 63, Subpart S, because only fresh steam is used in the chip bin.

The Digester and Evaporator systems are subject to 40 CFR, Part 63, Subpart S for Pulp and Paper Manufacturers. They are not subject to 40 CFR, Part 60, Subpart BB for Kraft Digesters as it was installed in 1965, prior to the applicability date of September 24<sup>th</sup>, 1976. The control of VOC emissions from the Digester system by incineration in the #3 Recovery Boiler, #9 Power Boiler or the NCG incinerator complies with 06-096 CMR 124 (as amended), and is therefore determined to be meeting VOC RACT.

Streamlining

1. TRS

06-096 CMR 124 (as amended) contains the only applicable TRS emission standards.

**No streamlining is required.**

2. VOC

This source is subject to and has been evaluated for VOC RACT per 06-096 CMR 134 (as amended). **No streamlining is required.**

3. HAPs

40 CFR, Part 63, Subpart S contains the only applicable HAP standard.

**No streamlining is required.**

J. Brownstock Washer System

The Brownstock Washer System washes the cooked pulp from the digester in order to remove the residual liquor that would contaminate the pulp during subsequent processing steps and recover the maximum amount of spent chemicals with minimum dilution.

The Brownstock Washer System is subject to the requirements of 40 CFR, Part 63, Subpart S. It is not subject to 40 CFR, Part 60, Subpart BB since it was installed in 1965, prior to the applicability date of September 24<sup>th</sup>, 1976, and has not since been modified or reconstructed.

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The Brownstock Washer System includes a Pressure Diffusion Washer that was installed in 1996 and is subject to 40 CFR, Part 63, Subpart S. The Pressure Diffusion Washer is not subject to 40 CFR, Part 60, Subpart BB because “diffusion washers” are excluded from the definition of “brownstock washers” for the purposes of that subpart.

Streamlining

1. TRS  
06-096 CMR 124 (as amended) contains the only applicable TRS emission limit.  
**No streamlining is required**
  
2. VOC  
This source is subject to and has been evaluated for VOC RACT per 06-096 CMR 134 (as amended). **No streamlining is required**
  
3. HAPs  
40 CFR, Part 63, Subpart S contains the only applicable HAP standard.  
**No streamlining is required**

K. Bleach Plant and Chlorine Dioxide Generation

In the chlorine dioxide generation process, sodium chlorate reacts with methanol in the presence of sulfuric acid to form chlorine dioxide and a spent acid stream containing formic acid and an acidic salt cake. The bleach plant uses chlorine dioxide as a bleaching agent. The typical bleaching sequence is D<sub>0</sub> E<sub>1</sub> D<sub>1</sub> E<sub>2</sub> D<sub>2</sub>. Elemental Chlorine has been eliminated from the bleaching process. Oxygen (O) and Peroxide (P) are supplements to the alkaline extraction stage (E).

Emissions from the Bleach Plant and Chlorine Dioxide Generation System are treated with a single packed bed scrubber. A tail gas scrubber pretreats some of the gas streams being fed to the bleach plant scrubber. Stack testing on the bleach plant scrubber may be conducted with the tail gas scrubber on or off line as described in Specific Condition 25(E). The Bleach Plant and Chlorine Dioxide Generation System are subject to *Chlorine and Chlorine Dioxide Emission Standard*, 06-096 CMR 122 (as amended), and the Bleach Plant is subject to 40 CFR, Part 63, Subpart S.

Streamlining

1. Cl<sub>2</sub> and ClO<sub>2</sub>  
06-096 CMR 122 (as amended) contains applicable Cl<sub>2</sub> and ClO<sub>2</sub> lb/hr emission limits.  
**No streamlining is required**

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2. VOC

This source is subject to and has been evaluated for VOC RACT per 06-096 CMR 134 (as amended). **No streamlining is required**

3. HAPs

40 CFR, Part 63, Subpart S contains applicable compliance options at 63.445 (c) for emissions of chlorinated HAPs. **No streamlining is required**

Periodic Monitoring

Per A-215-70-J-A, beginning June 23, 2008 WPLLC shall stack test the Bleach Plant/ClO<sub>2</sub> Generation System Scrubber every five calendar years for Cl<sub>2</sub> and ClO<sub>2</sub> emissions in accordance with NCASI Method 520 for sampling chlorine and chlorine dioxide.

MACT CMS

40 CFR, Part 63, Subpart S contains an applicable requirement to operate a CMS for the Bleach Plant Scrubber. A letter dated February 23, 2001, requesting alternative monitoring from Subpart S was sent to, and approved by, the EPA by a letter dated March 14<sup>th</sup>, 2001. Therefore, the MACT CMS for the Bleach Plant Scrubber shall consist of the following:

Item to be monitored	Record	Average
Scrubber liquid influent recycle flow rate	Every 15 min	3 hr block avg every 3 hours
pH or ORP of the scrubber liquid	Every 15 min	3 hr block avg every 3 hours
Scrubber Fan On/Off	Every 3 hours	N/A

The CMS parameter range shall be determined or modified as necessary, according to the procedures as specified in 40 CFR, Part 63.453(n).

Control Equipment

Control equipment for the Bleach Plant/ClO<sub>2</sub> Generation System consists of a single packed bed scrubber.

L. Lime Kiln Slakers and Causticizers

WPLLC operates two lime slakers (designated as small and large) and four causticizers. Green liquor and lime are fed to the slaker-causticizer assembly and converted into white liquor, which is used in the digester. WPLLC uses the small slaker for backup purposes.

Particulate emissions from the large slaker are controlled by a dynamic fan type wet scrubber, which uses green liquor as a scrubbing medium. Particulate

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emissions from the small slaker are controlled with a scrubber using green liquor as a scrubbing medium.

Streamlining

PM and PM<sub>10</sub>

06-096 CMR 105 (as amended) contains the only applicable PM standard.

**No streamlining is required**

Periodic Monitoring

Periodic monitoring for the Lime Kiln Slaker Scrubber shall be the following:

Item to be monitored	Record
Scrubber media flow rate	Once per shift

Control Equipment

Particulate emissions from the Lime Kiln Slakers and Causticizers are controlled by a dynamic fan type wet scrubber which uses green liquor as a scrubbing medium.

M. Lime Kiln

The Lime Kiln is a rotary kiln unit fired with #6 fuel oil. The Lime Kiln has a nominal production capacity of 440 ton/day of calcium oxide (lime, CaO). The kiln has a nominal heat input capacity of 75 MMBtu/hr. The Lime Kiln is used to recover lime (CaO) from lime mud (a product of causticizing green liquor). Lime is then used in the chemical conversion of green liquor to white liquor.

NSR permit A-215-77-4-A allows the Lime Kiln to fire Natural Gas as a replacement for #6 Fuel Oil. The Lime Kiln shall still be permitted to fire #6 Fuel Oil in the event Natural Gas becomes unavailable.

The Lime Kiln was constructed in 1965, prior to September 24<sup>th</sup>, 1976, and is therefore not subject to the requirements of 40 CFR, Part 60, Subpart BB. The Lime Kiln is subject to the requirements of 40 CFR, Part 63, Subpart MM and 06-096 CMR 124 (as amended). In 1989, RACT emission limits were determined for the Lime Kiln in Air Emission License #A-215-71-B-A/R.

Particulate emissions from the Lime Kiln are controlled by a variable throat venturi scrubber and a Ceilcote crossflow scrubber. The Lime Kiln is equipped to continuously monitor and record venturi scrubber pressure drop, media flow rate, O<sub>2</sub>, and TRS.

BART Requirements

The Lime Kiln is considered an eligible unit for Best Available Retrofit Technology (BART) as defined in the Regional Haze Rule 40 CFR, Part 51. The

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BART determination for the Lime Kiln was established in A-215-77-2-A and is summarized below:

1. As part of this Part 70 Air Emission License, WPLLC is required to meet the PM standard found in 40 CFR, Part 63, Subpart MM. No further action is required.
2. SO<sub>2</sub> - operation of two wet scrubbers and In-process control to comply with emission limit of 8.3 lb/hr. WPLLC is already required to meet this limit per this Part 70 Air Emission License. No further action is required.
3. NO<sub>x</sub> - good combustion practices and compliance with emission limit of 120 ppmvd corrected to 10% O<sub>2</sub>. WPLLC is already required to meet this limit per this Part 70 Air Emission License. No further action is required.

Streamlining

1. PM and PM<sub>10</sub>
  - a. WPLLC accepts streamlining for the PM standards of 06-096 CMR 105 (as amended), 40 CFR, Part 63, Subpart MM, and BART. The standard of Subpart MM is determined to be more stringent and is therefore the only PM concentration standard included in this license
  - b. BPT (A-215-71-B-A/R) established the only applicable PM and PM<sub>10</sub> lb/hr emission limits.  
**No streamlining is required**
  
2. SO<sub>2</sub>  
WPLLC accepts streamlining for SO<sub>2</sub>. BART and RACT (A-215-71-B-A/R) establish applicable SO<sub>2</sub> lb/hr emission limits for the Lime Kiln. Only the RACT emission limit of 8.3 lb/hr is included in this license.
  
3. NO<sub>x</sub>
  - a. WPLLC accepts streamlining for NO<sub>x</sub>. BART and RACT (A-215-71-B-A/R) establish applicable NO<sub>x</sub> lb/hr emission limits for the Lime Kiln. Only the RACT emission limit of 120 ppmvd corrected to 10% O<sub>2</sub> is included in this license
  - b. RACT (A-215-71-B-A/R) establishes the only applicable NO<sub>x</sub> lb/hr emission limit. **No streamlining is required**
  
4. CO  
BPT (A-215-71-B-A/R) established the only applicable CO lb/hr emission limit.  
**No streamlining is required**
  
5. TRS  
06-096 CMR 124 (as amended) contains the only applicable TRS ppm emission limit.  
**No streamlining is required**

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6. VOC

- a. This source is subject to and has been evaluated for VOC RACT per 06-096 CMR 134 (as amended). **No streamlining is required**
- b. BPT (A-215-71-B-A/R) established the only applicable VOC lb/hr emission limit.  
**No streamlining is required**

Periodic Monitoring

Periodic Monitoring shall consist of record keeping that includes fuel use records and fuel analysis records. Periodic monitoring for the Lime Kiln shall also consist of calculating the daily oil fired on a quarterly basis.

WPLLC shall stack test the Lime Kiln every five calendar years for PM in accordance with 40 CFR, Part 60, Appendix A, Method 5 WPLLC shall stack test the Lime Kiln every five calendar years for NO<sub>x</sub> in accordance with 40 CFR, Part 60, Appendix A, Method 7E.

Based on best management practices and the type of fuel for which the Lime Kiln was designed, it is unlikely that the Lime Kiln will exceed the emission limits for CO and VOC. Therefore periodic monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting the Mill to perform testing, and may take enforcement action for any violations discovered.

MACT CMS

MACT, 40 CFR, Part 63, Subpart MM contains an applicable requirement to operate a CMS for the Lime Kiln Scrubbers. The MACT CMS for the Lime Kiln Scrubbers shall consist of the following in accordance with 40 CFR, Part 63, Subpart MM. The MACT CMS shall be installed, operational and data verified pursuant to 40 CFR Part 63.8(c)(3).

Items to be Monitored	Record	Average
Scrubber Pressure Drop	Every 15 min	3 hr block avg once every 3 hours
Scrubber media flow rate	Every 15 min	3 hr block avg once every 3 hours

The CMS parameter range shall be determined, or modified as necessary, according to the procedures as specified in 40 CFR Part 63.864(j).

CEMS

06-096 CMR 124 contains an applicable requirement to monitor TRS ppm emissions.

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There are no COMS required to be operated for the Lime Kiln. Based on the above, WPLLC shall operate a CEMS which provides data to calculate TRS ppm and O<sub>2</sub> ppm emissions from the Lime Kiln.

Control Equipment

Particulate control equipment for the Lime Kiln consists of a variable throat venturi scrubber and a Ceilcote crossflow scrubber.

N. Steam Stripper

The Steam Stripper was installed in September of 1999 in order to comply with 40 CFR, Part 63, Subpart S. Hot condensate from the stripper is sent to the "clean combined condensate tank" for reuse in the brown stock washing system. The stripper off-gases are burned in the #3 Recovery Boiler, #9 Power Boiler, or in the NCG Incinerator.

The Steam Stripper is subject to the requirements of 40 CFR, Part 60, Subpart BB, as well as 40 CFR, Part 63, Subpart S. Pursuant to 40 CFR, 63.446(g) the Steam Stripper must have a minimum of 90% up-time.

In 2003, a WATER9 Model was conducted on the Waste Water Treatment Plant (WWTP) to study the ability of the WWTP to remove HAPs from condensate streams that had bypassed the Steam Stripper from May 11 to June 9, 2002. The study supported Domtar's position that the WWTP was effective at removing HAPs when the Steam Stripper was bypassed. As a result, the environmental impact of bypassing the steam stripper was negligible.

Streamlining

1. VOC

This source is subject to and has been evaluated for VOC RACT per 06-096 CMR 134 (as amended). **No streamlining is required**

2. HAPs

40 CFR, Part 63, Subpart S contains applicable HAP standards for this source. **No streamlining is required**

MACT CMS

MACT, 40 CFR, Part 63, Subpart S contains an applicable requirement to operate a CMS for the Steam Stripper. The MACT CMS for the Steam Stripper shall consist of the following:

Items to be Monitored	Record	Average
Stripper Condensate Feed Rate	Every 15 min	3-hr block avg every three hours
Steam feed rate	Every 15 min	3-hr block avg every three hours
Stripper Condensate Feed Temperature	Every 15 min	3-hr block avg every three hours
Steam flow to Condensate flow ratio	Every 15 min	3-hr block avg every three hours

The CMS parameter range shall be determined, or modified as necessary, according to the procedures as specified in 40 CFR Part 63.864(j).

O. Bulk Handling System

WPLLC operates two separate bulk handling systems: hot lime handling system (average of 440 ton/day), and fresh lime make-up system (average of 37 ton/day). Each system consists of enclosed conveyers, hopper and silos.

Emissions from each system consist primarily of PM. Each system is equipped with a baghouse to control particulate emissions. Also, the hot lime system is equipped with an alarm system for overfilling or other malfunctions while unloading.

P. Non-Condensable Gas (NCG) Incinerator

The NCG Incinerator is a Jettherm BK-6 single chamber propane or Natural Gas fired incinerator with a maximum operating capacity of 20 MMBtu/hr. It serves as a back-up incinerator to the #3 Recovery Boiler and the #9 Power Boiler, which are the primary incinerators for NCGs and Stripper off Gases (SOG). For the proper incineration of TRS gases, the NCG incinerator shall operate at a temperature adequate to comply with 40 CFR, Part 63, Subpart S.

The NCG Incinerator is limited to 2637 hours per year of operation (12 month rolling total). The NCG Incinerator is subject to the requirements of 40 CFR, Part 63, Subparts A and S.

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Streamlining

1. PM and PM<sub>10</sub>
  - a. 06-096 CMR 103 contains the only applicable PM lb/MMBtu emission limit. **No streamlining is required**
  - b. BACT (A-215-71-AC-A) established the only applicable PM and PM<sub>10</sub> lb/hr emission limits.  
**No streamlining is required**
2. SO<sub>2</sub>

BACT (A-215-71-AC-A) establishes the only applicable SO<sub>2</sub> lb/hr emission limits.  
**No streamlining is required**
3. NO<sub>x</sub>

BACT (A-215-71-AC-A) establishes the only applicable NO<sub>x</sub> lb/hr emission limits.  
**No streamlining is required**
4. CO  
BACT (A-215-71-AC-A) establishes the only applicable CO lb/hr emission limits.  
**No streamlining is required**
5. VOC  
BACT (A-215-71-AC-A) establishes the only applicable VOC lb/hr emission limits.  
**No streamlining is required**

Periodic Monitoring

Periodic Monitoring shall consist of record keeping which demonstrates the type of fuel used in the NCG Incinerator during operation.

Based on best management practices and the type of fuel used in the NCG Incinerator, it is unlikely that the NCG Incinerator will exceed the emission limits for PM, NO<sub>x</sub>, SO<sub>2</sub>, CO, or VOC. Therefore, Periodic Monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting the Mill to perform testing and may take enforcement action for any violations discovered.

MACT CMS

MACT, 40 CFR, Part 63, Subpart S contains an applicable requirement to operate a CMS for the NCG Incinerator. The MACT CMS for the NCG Incinerator shall consist of the following:

Item to be monitored	Record
Incinerator temperature	1 minute average

The CMS parameter range shall be determined, or modified as necessary, according to the procedures as specified in 40 CFR Part 63.864(j).

Q. Chip Thickness Screening System

1. The rotary drum screen shall only operate when the chip thickness screening system is out of service.
2. Visible emissions from the primary/secondary cyclone system, located in the chip thickness screening building, shall not exceed 20% opacity on a six minute block average basis, except for no more than 1 (one), 6 (six) minute block average in a 1-hour period.

R. Waste Water Treatment Plant (WWTP)

By Federal Regulation, WPLLC is required to operate with a National (or State) Pollution Discharge Elimination System (NPDES or SPDES) permit. By maintaining a valid NPDES or SPDES permit, the Department previously determined that WPLLC's WWTP is meeting VOC RACT.

S. Visibility

An assessment of visibility impacts was submitted in July, 1987. This analysis characterized potential impairment at 3 Class I areas, the northern and southern sections of the Moosehorn National Wildlife Refuge (MNWR) and Roosevelt Campobello International Park. This analysis was conducted in accordance with the procedures contained in the EPA Workbook for Estimating Visibility Impairment (EPA-450/4-80-031, November, 1980). The level I analysis was sufficient to demonstrate the proposed mill configuration would pose no impairment to visibility at the Roosevelt Campobello International Park or the southern section of the MNWR. WPLLC and the Federal Land Manager disagreed over whether modeling conducted by both parties demonstrated an adverse impact on visibility from the #3 Recovery Boiler in the Northern Section of the MNWR. However, the Federal Land Manager and WPLLC agreed that the #3 Recovery Boiler will not contribute to an adverse visibility impact on the Northern Section of the MNWR if the combined mill's NO<sub>x</sub> emissions from the Lime Kiln, #3 Recovery Boiler, and the #9 Power Boiler are limited to: 371 lb/hr, 8904 lb/day and 1178 ton/yr.

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T. Facility Emissions

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

<u>Equipment</u>	<u>PM</u>	<u>PM<sub>10</sub></u>	<u>SO<sub>2</sub></u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>VOC</u>	<u>TRS</u>
#9 Power Boiler	394	394	676	780	5008	130	-
#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	0.06	-
NCG Incinerator	8.4	8.4	12.7	39.6	2.8	0.2	-
<b>TOTALS</b>	<b>784.4</b>	<b>784.4</b>	<b>2300.6</b>	<b>1178.0<sup>a</sup></b>	<b>7745.2</b>	<b>306.3</b>	<b>13.6</b>

- a. Please note that the total NO<sub>x</sub> limit for the mill is less than total allowable emissions from individual units. WPLLC 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 ton/yr (on a 12 month rolling total).
- b. PM10 and CO are not used in the calculation of the annual fee but are included in this table for completeness.
- c. Emissions limits in the table do not include insignificant activities and process units (e.g. woodyard) which have no licensed emission limits.

**III. AIR QUALITY ANALYSIS**

WPLLC 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). An additional ambient air quality analysis is not required for this Part 70 License Renewal.

**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-215-70-I-R/A pursuant to 06-096 CMR 140 (as amended) and the preconstruction permitting requirements of 06-096 CMR 115 (as amended) and subject to the standard and special conditions below.

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All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to WPLLC pursuant to the Department's preconstruction permitting requirements in 06-096 CMR 108 (as amended) or 06-096 CMR 115 (as amended) have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 CMR 115 (as amended) for making such changes and pursuant to the applicable requirements in 06-096 CMR 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

**Standard Statements**

**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 CMR 140]
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [06-096 CMR 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 CMR 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 CMR 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 CMR 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 effect 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 October 8<sup>th</sup>, 1999.

SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
#9 Power Boiler	40 CFR, Part 60, Subpart C, Ca, and Cb	Standards of Performance for Large Municipal Waste Combustors	The only waste burned is generated by the mill and is not considered municipal waste.
#9 Power Boiler	40 CFR, Part 60, Subpart E, Ea, and Eb	Standards of Performance for Incinerators	#9 Power Boiler's main function is not that of an incinerator.
#9 Power Boiler	40 CFR, Part 60, Subpart O	Standards of Performance for Sewage Treatment Plants	#9 Power Boiler's main function is not that of a municipal sewage incinerator.
#9 Power Boiler	40 CFR, Part 60, Subpart E	National Emission Standard for Mercury	This regulation was not intended to apply to multi-fuel boilers that burn sludge generated from the facilities WWTP.

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#9 Power Boiler	06-096 CMR 104	Incinerator Particulate Emission Standard	#9 Power Boiler is classified by Chapter 100 as fuel-burning equipment, not as an incinerator, and is therefore not subject to Chapter 104.
#9 Power Boiler	06-096 CMR 117	Continuous Opacity Monitoring Requirement	#9 Power Boiler is equipped with an approved wet scrubber.
#9 Power Boiler	06-096 CMR 121	Emission testing of resource recovery facilities	#9 Power Boiler is not a resource recovery facility.
#9 Power boiler	06-096 CMR 134	VOC RACT	Boilers are exempt per section 1(C)(4) of Chapter 134.
#9 Power Boiler	06-096 CMR 135	Hexavalent Chromium Particulate Emission Standard	#9 Power Boiler does not burn fuels which contain a total aggregate chromium concentration of 0.05% (or 500 ppm) by weight, as cited of section 2 of Chapter 135.
#3 Recovery Boiler	06-096 CMR 134	VOC RACT	Boilers are exempt per section 1(C)(4) of Chapter 134.
#3 Recovery Boiler	40 CFR Part 60, Subpart Db	Standards of Performance for Steam Generating Units	#3 Recovery Boiler is not subject to the NO <sub>x</sub> limits at Section 60.44b in Subpart Db, because it is limited to 10% annual capacity for oil.
Package Boiler	06-096 CMR 115 and 40 CFR, Part 51	PSD Licensing Requirements	Package Boiler has a licensed restriction of less than six weeks of operation per year.
Package Boiler	06-096 CMR 138	NO <sub>x</sub> RACT	Package Boiler is limited by license to less than 10 ton/yr NO <sub>x</sub> .
Pressure Diffusion System	40 CFR, Part 60, Subpart BB	Standards of Performance for Kraft Mills and TRS Control from Kraft Pulp Mills	Definition of brownstock washer systems excludes diffusion washer systems.
Lime Kiln	06-096 CMR 134	VOC RACT	Fuel burning equipment is exempt from Chapter 134.

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Pulp Dryer	06-096 CMR 105	General Process Source Particulate Emission Standard	Pulp Dryer does not emit measurable particulate matter.
Steam Stripper	06-096 CMR 115 and 40 CFR, Part 51, PSD applicability	PSD License Procedures	Steam Stripper project was licensed as a pollution control project.
NCG Incinerator	40 CFR, Part 60, Subparts C, Ca, Cb, E, Ea, and Eb	Standards of Performance for Municipal Waste Combustors and Incinerators	NCG Incinerator is not a municipal waste incinerator.
#6 Fuel Oil Storage System	40 CFR, Part 60, Subparts K and Ka	Standards of Performance for Petroleum Liquid and Volatile Organic Liquid Storage Vessels	#6 fuel oil is not a petroleum liquid as defined in 60.111a (b).
#6 Fuel oil Storage System	40 CFR, Part 60, Subpart Kb	Standards of Performance for Petroleum Liquid and Volatile Organic Liquid Storage Vessels	#6 fuel oil has a vapor pressure less than 3.5 KPa. (per 10/15/03 Federal Register Notice)
Low Sulfur #6 Fuel Oil Storage Tank	40 CFR, Part 60, Subparts K and Ka	Standards of Performance for Petroleum Liquid and Volatile Organic Liquid Storage Vessels	#6 fuel oil is not a petroleum liquid as defined in 60.111a (b).
Low Sulfur #6 Fuel Oil Storage Tank	40 CFR, Part 60, Subpart Kb	Standards of Performance for Petroleum Liquid and Volatile Organic Liquid Storage Vessels	#6 fuel oil has a vapor pressure less than 3.5 KPa. (per 10/15/03 Federal Register Notice)
Facility	40 CFR, Part 63, Subpart OO	NESHAP for tanks – level 1	WPLLC does not own or operate any equipment subject to Subpart OO.
Facility	40 CFR, Part 63, Subpart PP	NESHAP for containers	WPLLC does not own or operate any equipment subject to Subpart PP.
Facility	40 CFR, Part 63, Subpart QQ	NESHAP for Surface Impoundments	WPLLC does not own or operate any equipment subject to Subpart QQ.
Facility	40 CFR, Part 63, Subpart RR	NESHAP for Individual Drain Systems	WPLLC does not own or operate any equipment subject to Subpart RR.

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Facility	40 CFR, Part 63, Subpart VV	NESHAP for Oil-Water Separators and Organic- Water Separators	WPLLC does not own or operate any equipment subject to Subpart VV.
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[06-096 CMR 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 3 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 CMR 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 CMR 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 CMR 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,

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conducting inspections, or examining and copying records relating to emissions and this license (38 M.R.S.A. §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 CMR 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 CMR 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.A. §353.
- (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 CMR 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 CMR 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 CMR 140]
- (8) In accordance with the Department's air emission compliance test protocol and 40 CFR 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 CFR 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 CMR 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 CFR 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 CMR 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.A. § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up 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 CMR 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 CMR 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 CMR 140]

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- (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 CMR 140]

### SPECIAL CONDITIONS

- (14) #9 Power Boiler  
 A. Emissions from the #9 Power Boiler shall not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority	Avg Time
PM	0.22	BPT, BART (A-215-77-2-A)	-
SO <sub>2</sub>	0.30 <sup>1</sup>	BPT, BART (A-215-77-2-A)	24 hr block
NO <sub>x</sub>	0.40 <sup>2</sup>	06-096 CMR 138, NO <sub>x</sub> RACT BART (A-215-77-2-A)	24 hr block

Pollutant	lb/hr	Origin and Authority	Avg Time
PM	84.4	06-096 CMR 140, BPT	-
PM <sub>10</sub>	84.4	06-096 CMR 140, BPT, <b>Enforceable by State Only</b>	-
SO <sub>2</sub>	186	06-096 CMR 140, BPT, <b>Enforceable by State Only</b>	3 hr block
NO <sub>x</sub>	186 <sup>3</sup>	06-096 CMR 140, BPT	24 hr block
CO	1192.4	BPT, #A-215-71-B-A/R, <b>Enforceable by State Only</b>	-
VOC	31.3	06-096 CMR 140, BPT, <b>Enforceable by State Only</b>	-

1. Effective date is 1/1/13. Until then, limit remains 0.79 lb/MMBtu.
2. See Condition 14(M) regarding compliance and for an alternative to this limit by combining NO<sub>x</sub> emissions with the #3 Recovery Boiler.
3. See Condition 16 for an alternative to this limit by combining NO<sub>x</sub> emissions with Recovery Boiler #3.

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- B. Except as set forth in Condition 14(C), #9 Power Boiler shall not exceed a heat input rate of 625 MMBtu/hr while firing a combination of “other fuel” and #6 fuel oil or natural gas. [06-096 CMR 140, BPT]
- C. While the #3 recovery boiler is offline or in a period of startup or shutdown, and the kraft mill, and the pulp dryer are all operating, Condition 14B of this license is not in effect. [06-096 CMR 140, BPT]
- D. WPLLC shall document the date and time when the #3 recovery boiler is offline or in a period of startup or shutdown, and the kraft mill, and the pulp dryer are all not operating. [06-096 CMR 140, BPT]
- E. WPLLC shall have no sulfur restrictions on fuel oil for the #9 power boiler, provided that emissions do not exceed the licensed limit for lb SO<sub>2</sub>/MMBtu on a 24 hr block average. [06-096 CMR 140, BPT, BART (A-215-77-4-A)]
- F. Visible emissions from the #9 power boiler shall not exceed an opacity of 30% on a six minute block average, except for no more than two (2), six (6) minute block averages in a three hour period. [06-096 CMR 101]
- G. Four hours of cold start-up or planned shut-down are exempt from opacity standards provided the Department determines that the boiler was operated in a manner consistent with good air pollution control device practices to minimize emissions during the cold start-up or planned shut-down. [06-096 CMR 101]
- H. WPLLC shall keep records of all maintenance and inspections performed on the grates, oil guns, and the combustion control systems for the #9 Power Boiler. Copies of these records shall be submitted to the Department upon request. [06-096 CMR 140, BPT] **Enforceable by State-only**
- I. An annual detailed review of scrubber operation shall be conducted by an original equipment manufacturer (OEM) representative, or otherwise qualified personnel. Any recommendations that arise shall be reviewed and acted upon as practicable. [06-096 CMR 140, BPT] **Enforceable by State-only**
- J. Records of scrubber review and all repairs shall be maintained, available upon request, and included in WPLLC’s quarterly reports for the quarter when the annual review is conducted. [06-096 CMR 140, BPT] **Enforceable by State-only**
- K. WPLLC shall operate, calibrate, and maintain O<sub>2</sub>, NO<sub>x</sub>, and SO<sub>2</sub> CEMS and a stack flow monitor in accordance with 40 CFR, Part 60, Appendix B and the data recovery requirements of 06-096 CMR 117.

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- L. The NO<sub>x</sub> and SO<sub>2</sub> CEMS shall record data on a lb/hr basis. WPLLC shall also record, on a daily basis, the total NO<sub>x</sub> emissions in lb/day from the #9 power boiler, and on a monthly basis, the total NO<sub>x</sub> emissions on a 12 month rolling total from the #9 power boiler. These emission rates shall be used to calculate the total NO<sub>x</sub> emissions for Condition 17. [#A-215-71-B-A/R]
- M. WPLLC may demonstrate compliance with NO<sub>x</sub> emission limits using an emissions averaging basis, with CEM data. The emissions averaging shall be calculated between the #9 Power Boiler and #3 Recovery Boiler on an equivalent lb/MMBtu or ppmv on a 24-hour daily block arithmetic basis. The emission averaging basis shall be calculated as follows:
1. Calculate the over-controlled NO<sub>x</sub> level from #3 Recovery Boiler by subtracting the # 3 Recovery Boiler actual NO<sub>x</sub> ppm<sub>dv</sub> corrected for O<sub>2</sub> from Chapter 138 limit (164 ppm, dry basis corrected for O<sub>2</sub>);
  2. Convert over-controlled NO<sub>x</sub> level from #3 Recovery Boiler from ppmv to lbs/hr;
  3. Convert over-controlled NO<sub>x</sub> level from #3 Recovery Boiler from lbs/hr to lbs/MMBtu;
  4. Subtract over-controlled NO<sub>x</sub> level from #3 Recovery Boiler (in lbs/MMBtu) from actual 24 hour average (lb/MMBtu) on #9 Power Boiler and compare this value with NO<sub>x</sub> RACT lb/MMBtu limit (0.4 lbs/MMBtu) to determine compliance.

This method can also be used if surplus NO<sub>x</sub> from #9 Power Boiler needs to be averaged with NO<sub>x</sub> emissions from #3 Recovery Boiler.

If a CEM is used to demonstrate compliance with NO<sub>x</sub> emission limits, then periods of startup, shutdown, malfunction, and fuel switching are not included in the 24-hour average emission rates, provided that records are maintained to show facility was operated to minimize emissions.

[Chapter 138 Sec 3(O); #A-215-71-S-A]

- N. Periodic monitoring for the #9 Power Boiler shall consist of the following:

Periodic monitoring	Record	Average
Scrubber pressure drop	Every 15 min	3 hr avg every three hours
Scrubber media recycle flow rate	Every 15 min	3 hr avg every three hours

[06-096 CMR 140, BPT]

- O. During periods of firing natural gas only, the wet scrubber is not required to be in operation. [06-096 CMR 140, BPT]

P. Compliance Assurance Monitoring (CAM)

1. WPLLC operates a wet scrubber on #9 Power Boiler to meet the requirements of CAM for PM.  
[40 CFR Part 64]:

**PM CAM:**

	<b>Indicator</b>
<b>Indicators</b>	Scrubber Pressure Drop Scrubber Media Recycle Flow Rate
<b>General Criteria</b>	
Measurement Method	Magnetic flow meters, Pressure drop indicators
Indicator Ranges	Scrubber Pressure Drop - TBD Scrubber Media Recycle Flow Rate – TBD  Indicator ranges shall be determined within 180 days of the issuance of this Part 70 License. Indicator ranges shall be established based on manufacturer’s recommendations, operational control experience, and stack testing results.  Excursions shall consist of any 3-hour block average outside the established indicator ranges. WPLLC shall take immediate corrective action in response to an excursion.
<b>Performance Criteria</b>	
Data Representativeness and QA/QC	Flow Meters and Pressure Drop Indicators shall be calibrated, maintained, and operated according to manufacturer’s specifications.
Monitoring Frequency	Record indicator data every 15 minutes. Average indicator data every 3 hours.
Data Collection Procedure	Data shall be recorded and stored electronically.

2. Any excursion shall be reported on semiannual reports. If excursions occur, WPLLC must also certify intermittent compliance with the emission limits for the control device monitored on their annual compliance certification. Excursions from the PM CAM indicator ranges shall only be considered violations if the emission limits specified in this license are exceeded. [40 CFR 64]
3. WPLLC shall restore normal operation of the control equipment as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. [40 CFR 64.7.d]
4. WPLLC shall operate and monitor the control equipment within the ranges established by the CAM plan outlined in section 1 above. Prior to making any changes to the approved CAM plan, WPLLC shall notify the Department and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification

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may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [40 CFR 64.7.e]

(15) #3 Recovery Boiler

The #3 Recovery Boiler shall comply with each of the following:

A. Emissions shall not exceed the following.

Pollutant	gr/dscf corrected to 8% O <sub>2</sub>	ppmv dry basis corrected to 8% O <sub>2</sub>	lb/hr	Origin and Authority
PM	0.021	-	40.68	A-215-71-B-A/R, BPT
PM <sub>10</sub>	-	-	40.68	A-215-71-B-A/R, BPT
SO <sub>2</sub>	-	150 (30 day rolling average)	373.04, (3 hour block average) <sub>1</sub>	A-215-71-B-A/R, BPT
NO <sub>x</sub>	-	80 (30 day rolling avg) <sub>2</sub> 164 (24 hr block avg) <sub>2</sub>	143.3 (24 hour block average) <sub>3</sub>	A-215-71-B-A/R, BPT
CO	-	215 (30 day rolling avg)	235 (24 hr block average) <sub>3</sub>	A-215-71-B-A/R, BPT
VOC	-	-	40.2 (based on appropriate EPA stack testing method)	06-096 CMR 140, BPT ( <b>Enforceable by State only</b> )
TRS	-	5 (12 hr block average) <sub>4</sub>	-	A-215-71-B-A/R, BPT

1. See Condition 15(F)(1) for an alternative to this limit.
2. See Condition 14(U) regarding compliance and for alternatives to these limits by averaging emissions with the #9 Power Boiler.
3. See Condition 16 for alternatives to these limits by averaging emissions with the #9 Power Boiler.
4. The first 2 (two) 12 (twelve)-hour block averages in a calendar quarter which exceed 5 ppm are not considered violations of Chapter 124 or this License.

B. The 30 day rolling average shall be calculated and updated for each calendar day the boiler operates, as described in 40 CFR, Part 60, Method 19 (equation 19-19).

C. The 3-hour block average shall be calculated in eight consecutive 3-hour blocks per day, beginning at midnight. [06-096 CMR 140, BPT]

D. WPLLC shall not exceed an annual oil capacity of 10% for the #3 Recovery Boiler. Therefore, WPLLC shall be limited to 6,822,930 gal #6 fuel oil on a

12 month rolling total. Fuel use records shall be kept to demonstrate compliance with this limit. [40 CFR, Part 60, Subpart Db]

E. WPLLC shall record CEMS data for SO<sub>2</sub> and NO<sub>x</sub> on the #3 Recovery Boiler, on a lb/hr basis. [A-215-71-B-A/R, BPT]

F. WPLLC shall: [A-215-71-B-A/R, BPT]

- 1) Not exceed the SO<sub>2</sub> emission limit of 373.04 lb/hr on a 3-hour block average basis for the #3 recovery boiler, except for the 300 hours per calendar year (see Condition 18) when the SO<sub>2</sub> emissions cap for the #3 recovery boiler and the #9 power boiler is not in effect.
- 2) Demonstrate compliance with the SO<sub>2</sub> limits in 40 CFR, Part 60, Subpart Db, for the #3 recovery boiler by either of the following:
  - i) The use of low sulfur oil (no greater than 0.5% by weight), or
  - ii) By means of SO<sub>2</sub> CEMS data and actual total heat input data to maintain a maximum emission rate of 0.5 lb/MMBtu from all fuel on a 30-day rolling average basis, regardless of the percent sulfur content. The hourly emission rate averages calculated from CEMS information and calculated heat input from fuel shall be used to calculate emission rate averages for 30, consecutive, steam generating days.
- 3) If WPLLC demonstrates compliance with SO<sub>2</sub> emission limits by using low sulfur fuel oil, as described in Condition 15(F)(2)(i), WPLLC may demonstrate compliance on the basis of fuel supplier receipts, or WPLLC may sample the fuel on a daily basis, and demonstrate that the oil contains 0.5% sulfur or less in an as-fired condition on a 30-day rolling average basis.
- 4) If WPLLC demonstrates compliance with SO<sub>2</sub> emission limits via SO<sub>2</sub> CEMS data, as described in Condition 15(F)(2)(ii), WPLLC shall submit with the quarterly reports, SO<sub>2</sub> CEMS monitoring data and delivered total fuel heat content. The hourly emission rate averages calculated from CEM data, and the calculated MMBtu heat input from fuel shall be used to calculate emission rate averages for 30 consecutive steam generating days (e.g. 30-day rolling average). The actual 30-day average shall not exceed 0.50 lb SO<sub>2</sub>/MMBtu for all fuels.

G. WPLLC shall maintain records of the fuel oil analysis provided by the supplier. [A-215-71-B-A/R, BPT]

H. Operation of the #3 recovery boiler with only one ESP chamber in operation shall not exceed the maximum firing rate established through EPA reference test method 5 at which 0.021 gr/dscf and 40.68 lb/hr of PM emissions shall not be exceeded. As used in this Condition 15(H), the maximum boiler firing rate shall be 2.79 MM lbs. BLS/day when the north or south ESP chamber is

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not operational. Testing was conducted in 2008 to establish the maximum firing rates when an ESP field is down. [A-215-71-B-A/R, BPT]

- I. WPLLC shall record hourly total NO<sub>x</sub> emissions in lb/hr, shall record daily total NO<sub>x</sub> emissions in lb/day, and shall record monthly (calendar month) the total NO<sub>x</sub> emissions for the most recent 12 months for the #3 Recovery Boiler. This data shall be used to calculate the total facility NO<sub>x</sub> emissions for Condition 16. [A-215-71-B-A/R, BPT]
- J. WPLLC shall maintain records of startup, shutdown, and malfunction (SSM) for the #3 Recovery Boiler and maintain an SSM plan pursuant to 40 CFR, Part 63, Subpart MM.
- K. WPLLC shall operate a COMS to monitor opacity from the #3 Recovery Boiler pursuant to 40 CFR, Part 63, Subpart MM.
- L. Periodic monitoring for the #3 Recovery Boiler shall consist of the following:  
[A-215-71-B-A/R, BPT]

Items to be Monitored	Record
Black liquor firing rate	24-hr average

- M. The #3 Recovery Boiler shall vent through a 275 ft AGL (Above Ground Level) stack. [A-215-71-B-A/R, BPT]
  - N. The #3 Recovery Boiler is subject to 40 CFR, Part 60, Subparts A, BB, and Db, as well as 40 CFR, Part 63, Subparts A, S, and MM.
  - O. WPLLC has chosen to comply with the opacity standard option in 06-096 CMR 101, Section 2(B)(2)(a)(ii) for the #3 Recovery Boiler. By choosing this option, WPLLC shall also be subject to the requirements of 06-096 CMR 101, Section 2(B)(2)(b) for the #3 Recovery Boiler.
  - P. When #3 RB is firing only natural gas, the ESP is not required to be in operation. [06-096 CMR 140, BPT]
- (16) Combined lb/hr Emissions From #3 Recovery Boiler and #9 Power Boiler  
[A-215-71-AC-A, A-215-71-AH-M]
- A. When NO<sub>x</sub> emissions from the #3 Recovery Boiler are greater than 143.3 lb/hr on a 24-hour average basis, a combined limit of 329.3 lb/hr on a 24-hour average for #3 Recovery Boiler and #9 Power Boiler shall apply. These alternative limits may not be used more than 60 times per year (12 month rolling total).

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- B. When NO<sub>x</sub> emissions from #9 Power Boiler are greater than 186 lb/hr on a 24-hour average basis, the combined NO<sub>x</sub> emissions from both units shall not exceed the total of 329.3 lb/hr on a 24-hour average basis. This alternative limit may not be used more than 5 times per year (12 month rolling total). During such periods, WPLLC shall keep records detailing the use of these limits, including a 12 month rolling total. WPLLC shall still meet the BACT limits of 164 ppmv, on a dry basis, corrected to 8% O<sub>2</sub>, on a 24-hour block average basis and 80 ppmv, corrected to 8% O<sub>2</sub>, on a 30 day rolling average, for the #3 Recovery Boiler, except that it may utilize the Emissions Averaging allowed in Condition 14(M) to meet such ppmv limits.
- C. A combined CO emission limit for #9 Power Boiler and #3 Recovery Boiler shall be in effect only when #9 Power Boiler is off-line. Combined CO emissions from #9 Power Boiler and #3 Recovery Boiler shall not exceed 1427.4 lb/hr on a 24-hour block average basis, for no more than seven, 24-hour block averages in any year (12 month rolling total). If #9 Power Boiler is off-line for less than a 24-hour period, then this period shall be time weighted to adjust the additional CO amount for the #3 Recovery Boiler 24-hour block average.
- (17) WPLLC shall limit the mill-wide NO<sub>x</sub> emissions to 371 lb/hr, 8904 lb/day, and 1178 ton/yr (based on a 12-month rolling total). No more than five times per year, WPLLC may exceed the lb/hr limit of 371. During these instances, the mill-wide NO<sub>x</sub> emissions shall not exceed 450 lb/hr. Records shall be maintained to demonstrate compliance with these limits. [06-096 CMR 140, BPT]
- (18) The combined total SO<sub>2</sub> emissions from the #3 RB and the #9 power boiler shall not exceed 793.04 lb/hr (based on a 3-hour block average). This combined emissions cap shall be in effect for no more than 300 hours per calendar year. [06-096 CMR 140, BPT, A-215-71-X-M]
- (19) Smelt Dissolving Tank [06-096 CMR 140, BPT, A-215-71-B-A/R, 40 CFR, Part 63, Subpart MM]

The smelt dissolving tank shall comply with each of the following:

- A. Emissions from the smelt dissolving tank shall not exceed the following:

Pollutant		lb/hr
PM	0.127 lb/ton BLS (dry weight)	11.9
PM <sub>10</sub>	-	11.9
SO <sub>2</sub>	-	5.89
TRS	0.033 lb/ton BLS (dry weight)	3.1

- B. The smelt dissolving tank shall vent through a 232 ft AGL stack.

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- C. WPLLC shall operate the smelt dissolving tank scrubber when the smelt dissolving tank is in operation, and may not exceed the applicable emission limits set forth in 06-096 CMR 124 and 40 CFR, Part 60, Subpart BB.
- D. The smelt dissolving tank is subject to 40 CFR, Part 60, Subparts A and BB as well as 40 CFR, Part 63, Subparts A and MM.
- E. WPLLC shall operate a continuous monitoring system that can be used to determine and record the pressure drop across the scrubber and the scrubber fluid flow rate at least once every successive 15-minute period in accordance with 40 CFR, Part 63.8(c).
- F. The monitoring used for continuous measurement of the pressure drop of the gas stream across the scrubber must be certified by the manufacturer to be accurate within a gauge pressure of  $\pm 500$  pascals ( $\pm 2$  inches of water gauge pressure).
- G. The monitoring device used for continuous measurement of the scrubbing liquid flow rate must be certified by the manufacturer to be accurate within  $\pm 5$  percent of the design scrubbing liquid flow rate.

(20) The Digester and Evaporator System

- A. WPLLC shall maintain and operate the TRS NCG collection system for the digester relief gases, exhaust gases from the blow tank, flash tank, condenser, and evaporator system to be incinerated in the #3 Recovery Boiler, #9 Power Boiler or the backup incinerator as required in 06-096 CMR 124.
- B. WPLLC shall operate and maintain a designated backup incinerator in accordance with 06-096 CMR 124.
- C. The Digester and Evaporator System is subject to 40 CFR, Part 63, Subparts A and S.

(21) Brownstock Washer System

The Pressure Diffusion Washer System shall meet the control requirements of 40 CFR, Part 63, Subpart S. The Brownstock Washer System, including the Pressure Diffusion Washer System, shall meet the control requirements in 06-096 CMR 124.

(22) Condensate Collection [06-096 CMR 140, BPT, 40 CFR, Part 63, Subpart S, 06-096 CMR 124]

WPLLC shall demonstrate compliance with the pulping condensate collection option listed in 40 CFR Part 63, §63.446(c)(3), which requires collection of

pulping process condensates that contain a total HAP mass rate of 11.1 lb/ton of oven-dry pulp.

WPLLC shall use a steam stripper to treat some of the pulping process condensate streams and send the captured HAP's to either the #3 Recovery Boiler, #9 Power Boiler or the NCG Incinerator in accordance with 40 C.F.R. § 63.446. The treatment of these condensate streams meets the requirements of 40 CFR, 63.446(e)(3), reducing or destroying the total HAPS by 92%, or 63.446(e)(5), removing 10.2 lb of HAPs per ton of oven-dry pulp, or achieving a total HAP concentration of 330 ppm or less at the outlet.

The steam stripper system is comprised of the steam stripper, foul condensate tank, and associated piping and ductwork.

- A. Emissions from the steam stripper and foul condensate tank shall be collected and controlled by the #3 Recovery Boiler, #9 Power Boiler or the NCG incinerator for a minimum of 99% of the stripper's operating time on a quarterly basis. The Steam Stripper must have a minimum of 90% up-time pursuant to 40 CFR, 63.446(g).

WPLLC shall record the amount of time on a quarterly basis of:

1. stripper operation
2. the combustion of Stripper Off Gas (SOG) in the #3 Recovery Boiler
3. the combustion of SOGs in the #9 Power Boiler
4. the combustion of SOGs in the NCG incinerator
5. any ventings of SOGs

Any venting of SOGs in portion or in whole shall be considered time of uncontrolled emissions, which shall not exceed the specified 1% above.

- B. WPLLC shall monitor and record the following as specified for the Steam stripper.

Item to be monitored	Record	Average
Stripper Condensate Feed Rate	Every 15 min	3-hr block avg every three hours
Steam feed rate	Every 15 min	3-hr block avg every three hours
Stripper Condensate Feed Temperature	Every 15 min	3-hr block avg every three hours
Steam flow to Condensate flow ratio	Every 15 min	3-hr block avg every three hours

- C. The steam stripper system is subject to 40 CFR, Part 60, Subpart BB, and 40 CFR, Part 63, Subpart S.

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(23) Non-Condensable Gas Incinerator [06-096 CMR 140, BPT, 40 CFR, Part 63, Subparts S and MM, 06-096 CMR 124]

The Non-Condensable Gas (NCG) incinerator shall comply with each of the following:

- A. The NCG incinerator shall serve as a backup incineration device to the #3 Recovery Boiler and #9 power boiler for the NCG system.
- B. The NCG incinerator shall fire Propane or Natural Gas.
- C. The NCG incinerator shall not operate more than 2637 hours per year (12 month rolling total).
- D. The NCG incinerator shall maintain a minimum combustion temperature adequate to comply with the conditions of 40 CFR, Part 63, Subpart S.
- E. In addition to Subpart S, the NCG Incinerator is subject to 06-096 CMR 124.
- F. Emissions from the NCG incinerator shall not exceed the following:

Pollutant	Lb/MMBtu	lb/hr
PM	0.20	3.9
PM <sub>10</sub>	-	3.9
SO <sub>2</sub>	-	5.9
<sup>1</sup> NO <sub>x</sub>	-	18.4
CO	-	1.3
VOC	-	0.1

- 1. The NO<sub>x</sub> emissions from the NCG incinerator shall be included in the mill-wide NO<sub>x</sub> limit found in Condition 17.
- G. The NO<sub>x</sub> emissions shall be calculated by multiplying the hours of incinerator operation with the above lb/hr NO<sub>x</sub> emission limit.
- H. Records of incinerator operation shall be maintained, and included in WPLLC's quarterly reports.
- I. WPLLC shall monitor and record the following as specified for the NCG incinerator:

Item to be monitored	Record
Incinerator temperature	1 min average

(24) Bleach Plant/Chlorine Dioxide Generation System [06-096 CMR 140, BPT, 06-096 CMR 122, A-215-70-J-A]

The Bleach Plant/Chlorine Dioxide Generation System shall comply with each of the following:

- A. Total ClO<sub>2</sub> emissions shall not exceed 3.0 lb/hr. **Enforceable by State-Only**
- B. Total Cl<sub>2</sub> emissions shall not exceed 3.0 lb/hr. **Enforceable by State-Only**
- C. Compliance testing for Cl<sub>2</sub> and ClO<sub>2</sub> emission limits shall be conducted consistent with the MEDEP stack testing protocol guidelines. **Enforceable by State-Only**
- D. Beginning June 23, 2008 WPLLC shall stack test the Bleach Plant/ClO<sub>2</sub> Generation System Scrubber every five calendar years for Cl<sub>2</sub> and ClO<sub>2</sub> emissions in accordance with NCASI Method 520 for sampling chlorine and chlorine dioxide. **Enforceable by State-Only**
- E. For the Bleach plant scrubber, WPLLC shall conduct compliance testing with the tail gas scrubber on-line. In addition, WPLLC shall conduct compliance testing with the tail gas scrubber off-line if the mill has operated with the tail gas scrubber off-line since the last compliance test. WPLLC may operate the Bleach Plant and ClO<sub>2</sub> Generation systems with the tail gas scrubber off-line if the previous testing has demonstrated compliance with the limit in Chapter 122 under the operating scenario. **Enforceable by State-Only**
- F. If at any time, WPLLC desires to use an alternate scrubbing media other than caustic or white liquor in either tower, WPLLC shall conduct compliance tests within 60 days to demonstrate that the emission limits specified in this license are being met. The alternate media shall comply with 06-096 CMR 122. **Enforceable by State-Only**
- G. Periodic monitoring for the ClO<sub>2</sub> Plant Scrubber System shall consist of the following:

Items to be Monitored	Record	Average
Scrubber liquid influent recycle flow rate	Every 15 min	3 hr block avg every 3 hours
pH or ORP of the scrubber liquid	Every 15 min	3 hr block avg every 3 hours
Scrubber Fan On/Off	Every 3 hours	N/A

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H. The Bleach Plant is subject to 40 CFR, Part 63, Subparts A and S.

(25) Lime Kiln Slakers and Causticizers [06-096 CMR 140, BPT]

The Lime Kiln Slakers and Causticizers shall comply with each of the following:

A. WPLLC shall periodically monitor the media flow rate to the slaker scrubber and record once per shift in a permanent log.

B. For the small, backup slaker, WPLLC shall operate a Ducon wetted fan scrubber on the slaker utilizing green liquor as the medium.

(26) Lime Kiln [06-096 CMR 140, BPT, #A-215-71-B-A/R, BART (A-215-77-2-A)]

The Lime Kiln shall comply with each of the following:

A. Emissions from the Lime Kiln shall not exceed the following:

Pollutant		lb/hr
PM	0.064 gr/dscf corrected to 10% O <sub>2</sub> based on EPA Method 5 stack testing.	20.8
PM <sub>10</sub>	-	20.8
SO <sub>2</sub>	-	8.3
NO <sub>x</sub>	120 ppm (dry basis) corrected to 10% O <sub>2</sub> based on appropriate EPA Method 7 stack testing.	41.7
CO	-	417
VOC	-	1.5
TRS	20 ppm (dry basis) corrected to 10% O <sub>2</sub> on a 12 hour block average basis.	-

B. WPLLC shall operate, calibrate, and maintain TRS and O<sub>2</sub> CEMS in accordance with 06-096 CMR 117.

C. WPLLC shall record hourly fuel firing rates to calculate and document hourly and daily NO<sub>x</sub> emissions by a DEP approved method that corresponds to the required NO<sub>x</sub> performance testing and submit the data in the quarterly reports. Until such a method is approved, use maximum hourly NO<sub>x</sub> emissions as determined by stack testing to calculate and document hourly NO<sub>x</sub> emissions. WPLLC shall record hourly total lime kiln NO<sub>x</sub> emissions in lb/hr, shall record daily total NO<sub>x</sub> emissions in lb/day, and shall record monthly (calendar month) the total NO<sub>x</sub> emissions for the most recent 12 months. This shall be used to calculate total facility NO<sub>x</sub> emissions.

D. The first four (4), twelve (12)-hour block averages in a quarter which exceed the TRS limits in Section 26(A) above are not violations of this License. [06-096 CMR 124]

- E. WPLLC shall not have restrictions in percent sulfur in fuel oil for the Lime Kiln, provided that emissions do not exceed 1.92 lb SO<sub>2</sub>/MMBtu in any 24-hour period, as set forth in 06-096 CMR 106. WPLLC shall not be required to operate SO<sub>2</sub> CEMS on the Lime Kiln as set forth in 06-096 CMR 117.
- F. WPLLC shall record CaO production rates in ton/day for the Lime Kiln.
- G. WPLLC shall operate a continuous monitoring system that can be used to determine and record the pressure drop across the scrubber and the scrubber fluid flow rate at least once every successive 15-minute period in accordance with 40 CFR, Part 63.8(c).
- H. The monitoring used for continuous measurement of the pressure drop of the gas stream across the scrubber must be certified by the manufacturer to be accurate within a gauge pressure of ±500 pascals (±2 inches of water gauge pressure). [40 CFR, Part 63, Subpart MM]
- I. The monitoring device used for continuous measurement of the scrubbing liquid flow rate must be certified by the manufacturer to be accurate within ±5 percent of the design scrubbing liquid flow rate. [40 CFR, Part 63, Subpart MM]
- J. The Lime Kiln is subject to 40 CFR, Part 63, Subparts A and MM.

(27) Fresh Lime, and Hot Lime, Bulk Handling Systems

The fresh lime and hot lime bulk handling systems shall comply with each of the following:

- A. WPLLC shall clean up spills within 24 hours of occurrence of each spill or deposit. [06-096 CMR 140, BPT] **Enforceable by State Only**
- B. WPLLC shall inspect all unloading systems for leaks and malfunction once per shift. If leaks and/or malfunctions occur, WPLLC shall discontinue unloading until leaks and/or malfunctions are eliminated. The inspection shall be recorded in a permanent log. [06-096 CMR 140, BPT]
- C. Visible emissions for the Bulk Handling System baghouses shall not exceed 10% opacity on a six minute block average basis, except for no more than one, six-minute block average in a one-hour period. WPLLC shall take corrective action if the visible emissions from the baghouses exceeds 5% opacity. [06-096 CMR 101]

(28) Portable Package Boiler [#A-215-71-E-A]

The Portable Package Boiler shall comply with each of the following:

- A. The Portable Package Boiler shall not exceed 77.3 MMBtu/hr of #2 fuel oil with a sulfur content not to exceed 0.25% by weight. WPLLC shall keep records of fuel use for the Portable Package Boiler, which shall consist of fuel supplier receipts, demonstrating percent sulfur content by weight.
- B. The Portable Package Boiler shall not operate when the #9 Power Boiler is on-line. "On-line" is defined as producing steam at the design pressure of the boiler. WPLLC shall maintain sufficient documentation to demonstrate compliance with this condition, including records documenting dates and times of operation for the Portable Package Boiler.
- C. The Portable Package Boiler shall not operate for more than 6 weeks per calendar year. WPLLC shall maintain sufficient documentation to demonstrate compliance with this condition.
- D. WPLLC shall maintain records of startup, shutdown, and malfunction for the Portable Package Boiler.
- E. Emissions from the Portable Package Boiler shall not exceed the following:

Pollutant	lb/MMBtu	lb/hr
PM	0.08	1.1
PM <sub>10</sub>	-	1.1
SO <sub>2</sub>	-	19.6
NO <sub>x</sub>	-	11.1
CO	-	2.8
VOC	-	0.1

- F. Visible emissions shall not exceed 20% opacity based on six minute block average basis, except for no more than one (1), six (6) minute block average, not to exceed 27% opacity in a one hour period.
  - G. The Portable Package Boiler may be subject to 40 CFR, Part 60, Subparts A and Dc.
- (29) Chip Thickness Screening System [06-096 CMR 140, BPT]

The Chip Thickness Screening System shall comply with each of the following:

- A. The rotary drum screen shall only operate when the chip thickness screening system is out of service. WPLLC shall keep a log of rotary drum screen operation.

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B. Visible emissions from the primary/secondary cyclone system, located in the chip thickness screening building, shall not exceed 20% opacity on a six minute block average basis, except for one, six-minute block average in any one-hour period. [06-096 CMR 101]

(30) Low Volume, High Concentration Collection and Control System

A. The digester and evaporator systems shall be vented to the LVHC system when the units are in use as specified in 40 CFR Part 63, Subpart S and 06-096 CMR 124 of the Department's regulations, with the #9 Power Boiler as the primary incineration unit and the #3 Recovery Boiler and NCG Incinerator as the back-up incineration units. [40 CFR Part 63, Subpart S and 06-096 CMR 124]

B. Pursuant to 06-096 CMR 124, WPLLC shall not allow venting of TRS from the LVHC or associated equipment that is required to be controlled which exceeds 40 minutes in duration or contributes to an aggregate TRS venting of more than 1% of quarterly operating time. Ventings within these parameters are not violations of this License. [06-096 CMR 124]

C. Pursuant to 40 CFR Part 63, Subpart S, WPLLC shall operate the LVHC system as follows:

1. The LVHC system shall be enclosed and vented into a closed-vent system per 40 CFR Part 63, Subpart S, Sections 63.443 and 63.450.
2. Periods of excess emissions reported under 40 CFR Part 63, Subpart S, Section 63.455 shall not be a violation of Sections 63.443 (c) and (d), or this License, provided that at the time of excess emissions (excluding startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed the following levels: 1% for control devices used to reduce the total HAP emissions from the LVHC system and 4% for control devices used to reduce the total HAP emissions from both the LVHC and HVLC systems.

[40 CFR Part 63 Subpart S 63.433 (e)(3)]

D. WPLLC shall comply with the applicable LVHC system recordkeeping and reporting requirements of 40 CFR Part 63, Subpart S and 06-096 CMR 124 of the Department's regulations. [40 CFR Part 63, Subpart S and 06-096 CMR 124]

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(31) High Volume Low Concentration Collection and Control System

- A. WPLLC shall operate an HVLC control and collection system for the brownstock washer systems, and, if required, knotters, and screens as required to meet 06-096 CMR 124 of the Department's regulations and 40 CFR Part 63, Subpart S. [06-096 CMR 124 and 40 CFR Part 63, Subpart S]
- B. WPLLC shall collect and control TRS emissions greater than 0.75 lb/hr from the brownstock washer system per the requirements of 06-096 CMR 124 of the Department's regulations. [06-096 CMR 124]
- C. The HVLC collection system shall maintain a 96% collection and control uptime based on quarterly brownstock washer system operating time. [06-096 CMR 124 and 40 CFR Part 63, Subpart S]
- D. WPLLC shall comply with the applicable HVLC system recordkeeping and reporting requirements of 40 CFR Part 63, Subpart S and 06-096 CMR 124 of the Department's regulations. [40 CFR Part 63, Subpart S and 06-096 CMR 124]

(32) Closed Collection and Vent System Monitoring

- A. For equipment required to be inspected per 40 CFR Part 63, Subpart S, Sections 63.453(k) and (l), WPLLC may exempt any closed vent system, fixed roof cover, or enclosure from 30-day and annual inspection, monitoring and repair requirements if it is determined that personnel performing the inspection of repair would be exposed to an imminent or potential danger, or the equipment could not be inspected without elevating the inspection personnel more than 6 feet above a supported surface. The site-specific monitoring plan must identify exempted equipment and describe how the equipment will be inspected and/or repaired during periods determined safe. [40 CFR Part 63, §63.453]
- B. WPLLC shall perform inspections in accordance with 40 CFR Part 63, Subpart S, Sections 63.453(k) and (l) once during each calendar month with at least 15 days elapsed time between inspections. [40 CFR Part 63, §63.453]

(33) Best Available Retrofit Technology (BART) [A-215-77-2-A]

**By January 1, 2013; WPLLC shall:**

A. For the #9 Power Boiler

1. Operate the wet scrubber to meet a compliance limit of 0.30 lb SO<sub>2</sub>/MMBtu based on a 24 hour average, as demonstrated by a continuous emission monitoring system.
2. Operate the wet scrubber to meet compliance limits of 0.22 lb PM/MMBtu and 84.4 lbs PM/hr.
3. Use Low NO<sub>x</sub> Burners , good combustion practices, and meet a compliance limit of 0.4 lb NO<sub>x</sub>/MMBtu.

B. For the Lime Kiln

1. Limit PM emissions to 0.064 gr/dscf corrected to 10% O<sub>2</sub>, as found in 40 CFR Part 63, Subpart MM.
2. Operate the two wet scrubbers and in-process control to achieve 90% control efficiency, and meet a compliance limit of 8.3 lb SO<sub>2</sub>/hr.

(34) Periodic Monitors [06-096 CMR 140]

A. The following Periodic Monitoring shall be recorded as specified by the applicable Special Conditions of this License. The records generated to demonstrate compliance may be from monitors, devices, calculations or other engineering methods which provide accurate and reliable data. If the periodic monitor allows the recording of accurate and reliable data less than 95% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions.

1. Scrubber pressure drop for the #9 Power Boiler.
2. Scrubber media recycle flow for the #9 Power Boiler.
3. Fuel use and firing rate records for the Portable Package Boiler if operated.
4. Scrubber flow rate for the Lime Kiln Slaker.
5. Fuel firing rate for the Lime Kiln.
6. Fuel use records for the #3 Recovery Boiler.
7. Documentation that WPLLC is maintaining a valid NPDES or SPDES permit.

8. Solvent containing > 5% VOC added to each parts washer.

B. Bleach Plant Monitors [06-096 CMR 122, 40 CFR, Part 63, Subpart S]

The following periodic monitoring shall be recorded as specified by the applicable Special Conditions of this License, for the Bleach Plant. The Bleach plant monitors must record accurate and reliable data. If the periodic monitor allows the recording of accurate and reliable data less than 90% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions.

1. Scrubber recycle flow for the Bleach Plant/ClO<sub>2</sub> System.
2. Scrubber pressure drop for the Bleach Plant/ClO<sub>2</sub> System.
3. Scrubber ORP for the Bleach Plant/ClO<sub>2</sub> System.
4. Scrubber Fan on/off setting for the Bleach Plant/ClO<sub>2</sub> System.

(35) The following are identified as MACT Continuous Monitoring Systems (CMS)

1. The CMS required by 40 CFR, art 63, Subpart MM by the applicable deadline.
2. The CMS required by 40 CFR, Part 63, Subpart S.
3. The specific performance requirements for the CMS identified above are listed in 40 CFR, Part 63, Subpart A and the appropriate Subpart.

(36) CEMS, COMS, and Periodic Monitors [06-096 CMR 140, BPT]

The CEMS, COMS, and periodic monitors required by this license shall be the primary means of demonstrating compliance with emission standards set by this Order, statute, state or federal regulation, as applicable. The licensee shall comply with the following:

A. Performance Specifications [06-096 CMR 117]

All CEMS and COMS shall meet the sampling and performance criteria specified in 40 CFR Part 51 Appendix P, and shall be operated in accordance with 40 CFR Part 60 Appendix F and 06-096 CMR 117 of the Departments regulations.

1. Conduct Relative Accuracy Testing (RATA) and/or Performance Audits in accordance with 06-096 CMR 117 of the Department's regulations.

2. Develop and maintain an updated quality assurance plan for all CEMS and COMS in accordance with 40 CFR Part 60 Appendix F and 06-096 CMR 117 of the Department's regulations.

**B. Recordkeeping [06-096 CMR 117]**

For all of the continuous emission monitoring (CEMS), continuous opacity monitor (COMS) required by this license, the licensee shall maintain records of the most current six year period and the records shall include:

- a. Documentation that all CEMS and COMS are continuously accurate, reliable and operated in accordance with 06-096 CMR 117, 40 CFR Part 51, Appendix P, and 40 CFR Part 60, Appendices B and F. A CEM or COM shall allow the recording of accurate and reliable data sufficient to meet the data recovery thresholds in Section 5 of 06-096 CMR 117.
- b. Records of all measurements, performance evaluations, calibration checks, and maintenance or adjustments for each CEMS and COMS as required by 40 CFR Part 51 Appendix P.

**C. Quarterly Reporting [06-096 CMR 117]**

The licensee shall submit a Quarterly Report to the Bureau of Air Quality within 30 days after the end of each calendar quarter, detailing the following, for the control equipment, periodic monitors, Continuous Emission Monitoring Systems (CEMS) or Continuous Opacity Monitoring Systems (COMS) required by this license.

1. All control equipment downtimes and malfunctions.
2. All CEMS or COMS downtimes and malfunctions.
3. Sources (with CEMS/COMS) downtime report (#3 Recovery Boiler, #9 Power Boiler and Lime Kiln).
4. All CEM and COMS Quality Assurance Reports such as CGAs and Opacity Audit Report.
5. Production and Daily Oil Firing Rates Report, which includes the following information:
  - (i) #3 Recovery Boiler daily average daily steam load (1000 # steam) black liquor solids fired per day and Oil flow (gallons per day);
  - (ii) #9 Power Boiler daily average daily steam load (1000 # steam) and Oil flow (gallons per day);
  - (iii) Digester Production (Air dried tons per day, ADTP);
  - (iv) Lime Kiln Production (tons of lime (CaO) produced per day).
  - (v) If no oil is fired, the Production and Daily Oil Firing Rates Report does not need to be prepared and submitted.
6. Grate block inspection and change report for #9 Power Boiler annually.
7. #9 Power Boiler venturi scrubber inspection and maintenance report by a qualified third party (annually).

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8. Prorated NO<sub>x</sub> Report (lb/MMBtu) for the #9 Power Boiler.
9. NCGs/SOGs venting report with durations and sources.
10. Incinerator running time for each month of the quarter (in hours).
11. Visibility Report – Conformance to millwide NO<sub>x</sub> **limit**.
12. SO<sub>2</sub> CEMS data and delivered total fuel heat content as per Special Condition 15(F)(4).
13. All excess events of emission and operational limitations set by this Order, Statute, state or federal regulations, as appropriate. The following information shall be reported for each excess event;
  - a. Standard exceeded;
  - b. Date, time, and duration of excess event;
  - c. Maximum and average values of the excess event, reported in the units of the applicable standard, and copies of pertinent strip charts and printouts when requested;
  - d. A description of what caused the excess event;
  - e. The strategy employed to minimize the excess event; and
  - f. The strategy employed to prevent reoccurrence.
14. A report certifying there were no excess emissions, if that is the case.

(37) Stack Testing [06-096 CMR 140, BPT]

WPLLC shall conduct stack testing in accordance with each of the following:

- A. Conduct particulate emission testing and demonstrate compliance once during the term of this License, pursuant to Condition 8 of this License, on the #3 Recovery Boiler.
- B. Conduct particulate emission testing and demonstrate compliance every calendar year on the #9 Power Boiler.
- C. Conduct PM and NO<sub>x</sub> stack emission testing on Lime Kiln every five calendar years.
- D. Conduct PM and TRS stack emission testing and demonstrate compliance once every five calendar years on the Smelt Tank.
- E. Beginning June 23, 2008, Conduct Cl<sub>2</sub> and ClO<sub>2</sub> stack testing on the Bleach Plant/ClO<sub>2</sub> Generation System Scrubber every five calendar years in accordance with NCASI Method 520 for sampling chlorine and chlorine dioxide.
- F. Any stack testing performed shall use appropriate EPA test methods found in 40 CFR, Part 60, Appendix A.

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G. WPLLC may report all particulate matter emissions measured by EPA Method 5 as PM<sub>10</sub>. Testing using EPA Method 201, 201A or 202 is not required.

H. VOC stack testing shall be conducted as requested by the Department using EPA Method 25A with results reported as carbon or propane.

(38) Parts Washer

Parts washers at WPLLC are subject to *Solvent Cleaners*, 06-096 CMR 130 (last amended June 28, 2004).

A. WPLLC shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 140, BPT]

B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 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 applicable sources under 06-096 CMR 130.

1. WPLLC shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
  - (i) Waste solvent shall be collected and stored in closed containers.
  - (ii) 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.
  - (iii) 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.
  - (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
  - (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.
  - (vi) 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.
  - (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material shall be immediately stored in covered containers.

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(viii) Work area fans shall not blow across the opening of the degreaser unit.

(ix) 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 CMR 130]

(39) Semiannual Reporting [06-096 CMR 140]

- A. The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on **January 31<sup>st</sup>** and **July 31<sup>st</sup>** 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 DEP within seven calendar days of the due date.
- C. Each semiannual report shall include a summary of the periodic and CAM monitoring required by this license.
- D. Each semiannual report shall include the annual capacity factor of #3 Recovery Boiler 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.

(40) Annual Compliance Certification

WPLLC shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The initial annual compliance certification is due January 31 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 DEP 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 CMR 140]

(41) Annual Emission Statement

In accordance with *Emission Statements*, 06-096 CMR 137 (last amended November 8, 2008), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- A. A computer program and accompanying instructions supplied by the Department; or
- B. A written emission statement containing the information required in 06-096 CMR 137.

The emission statement must be submitted by the date as specified in 06-096 CMR 137.

[06-096 CMR 137]

(42) The licensee is subject to the State regulations listed below.

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

(43) 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 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B.

[40 CFR, Part 82, Subpart F]

(44) Asbestos Abatement

When undertaking Asbestos abatement activities, WPLLC shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

(45) Risk Management Plan

The licensee is subject to all applicable requirements of 40 CFR Part 68 (Risk Management Plan).

(46) Operational Flexibility for Insignificant Units and Activities

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WPLLC may add or modify units and activities identified as "categorically exempt insignificant units and activities" under Appendix B of 06-096 CMR 140. WPLLC shall provide notice to the Department within 30 days of such addition or modification. Addition or modification of such units or activities does not require an amendment to this License.

(47) Expiration of a Part 70 license

- A. WPLLC shall submit a complete Part 70 renewal application at least 6 months prior, but no more than 18-months prior, to the expiration of this air license.
- B. Pursuant to Title 5 MRSA §10002, and 06-096 CMR 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 Chapter 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**

(48) New Source Review

WPLLC is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emissions license and the NSR requirements remain in effect even if this 06-096 CMR 140 Air Emissions License, A-215-70-I-R, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 18<sup>th</sup> DAY OF November, 2011.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie R. Bisson  
PATRICIA W. KEO, COMMISSIONER

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 5/4/2009

Date of application acceptance: 5/5/2009

Date filed with the Board of Environmental Protection:

This Order prepared by Jonathan Voisine, Bureau of Air Quality.

