



DEPARTMENT ORDER

**S.D. Warren Company  
Somerset County  
Skowhegan, Maine  
A-19-77-11-A**

**Departmental  
Findings of Fact and Order  
New Source Review  
NSR #11**

**FINDINGS OF FACT**

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

**I. REGISTRATION**

**A. Introduction**

FACILITY	S.D. Warren Company
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Modification
NAICS CODES	322121
NATURE OF BUSINESS	Pulp and Paper Mill
FACILITY LOCATION	1329 Waterville Road, U.S. Route 201 Skowhegan, Maine

**B. NSR License Description**

S.D. Warren Company (SDW) has requested a New Source Review (NSR) license to rebuild No. 1 Paper Machine. The rebuild will provide additional product flexibility and includes the installation of six natural gas fired burners in the on-machine coating dryer sections of the paper machine and a seventh natural gas burner to dry coating on a new on-machine size press.

SDW is planning to extend the natural gas pipeline from the Utilities and Recovery Area to the Paper Mill Area starting on or about May 1, 2017. Project start up is currently scheduled for Spring 2018, and design production rates are expected to be reached in 2021.

C. Emission Equipment

The following equipment is addressed in this NSR license:

**Fuel Burning/ Process Equipment**

<b>Equipment</b>	<b>Maximum Capacity (MMBtu/hr)</b>	<b>Maximum Firing Rate (scf/hr)</b>	<b>Fuel Type</b>	<b>Stack #</b>
Size Press Dryer	18.5	18,176	Natural Gas	DSD#1
High Intensity Coating Dryer #1	10.2	10,039	Natural Gas	HID #1
Opti Dry Coating Dryer #1	11.6	11,402	Natural Gas	SSD #1
High Intensity Coating Dryer #2	10.2	10,039	Natural Gas	HID #2
Opti Dry Coating Dryer #2	11.6	11,402	Natural Gas	SSD #2
High Intensity Coating Dryer #3	10.2	10,039	Natural Gas	HID #3
Opti Dry Coating Dryer #3	11.6	11,402	Natural Gas	SSD #3

D. Application Classification

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

The application for SDW's No.1 Paper Machine (No. 1 PM) rebuild does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements.

The modification of a major source is considered a major or minor modification based on whether or not expected emissions increases exceed the "Significant Emission Increase" levels as given in *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100.

SDW is proposing to modify the No. 1 PM in order to produce higher basis weight paper products. Paper Machines No. 2 and No. 3 will continue to produce current product grades with no physical changes to these two machines. As part of this project new on-machine coating and coating dryer sections will be added to the No. 1 PM. The existing coaters and coater drying systems on No. 1 PM will be removed. Seven natural gas fired dryers will be installed on No. 1 PM, six to dry the coating material and one to dry sizing.

The rebuild of No. 1 PM to produce higher basis weight paper products will have no impact on the existing pulp mill either on production rates or emissions. All pulp currently produced by the pulp mill is either used on the paper machines or

dried in the pulp mill. The dried pulp is either stored for future use by the paper machines or sold. The additional pulp required for the project will be purchased as dry lap (dried pulp bales) which will be repulped for use on No. 1 PM. The repulping process is expected to produce de minimis VOCs consistent with the Department's listing of "repulping" as an insignificant activity in 06-096 C.M.R. ch. 115, Appendix B section A(84).

Expected increases in emissions from the new natural gas burners used to dry the coating on No. 1 PM will not trigger significance levels. The new dryer burners will have a combined total maximum design heat input capacity of 83.9 MMBtu/hr. Since there are no existing natural gas fired coating dryers, there are no baseline emissions for the new dryer burners. Quantification of projected emissions increases are provided in Table 1.

*Table 1 - No. 1 Paper Machine Size Press and Coating Dryers Natural Gas Burners*

<b>Pollutant</b>	<b>Baseline Actual Emissions 2007/2008 (ton/year)</b>	<b>Projected Actual Emissions (ton/year)</b>	<b>Net Emissions Increase (ton/year)</b>	<b>Significant Emissions Increase Levels (ton/year)</b>
PM	--	0.27	0.27	25
PM <sub>10</sub>	--	1.07	1.07	15
PM <sub>2.5</sub>	--	1.07	1.07	10
SO <sub>2</sub>	--	0.14	0.14	40
NO <sub>x</sub>	--	10.74	10.74	40
CO	--	11.46	11.46	100
VOC	--	0.77	0.77	40
CO <sub>2e</sub>	--	16,843	16,843	75,000

The new natural gas coating dryers will replace the current steam heated coating drying system, and the existing steam machine drive will be replaced with an electrical drive. Energy needed to dry the additional paper produced will result in an increase in steam demand of approximately 40,000 lbs/hr from Power Boilers #1 and #2. There are no physical changes to these boilers as a result of this project, and the boilers will continue to operate within their previously licensed capacities and emission limits. As noted above, this project will not affect the pulp mill, including the recovery boiler. The recovery boiler will continue to be base loaded to support pulp production. Emissions associated with the increased steam demand from Power Boilers #1 and #2 are provided in Table 2.

*Table 2 - No. 1 & No. 2 Power Boilers (increase in steam demand)*

<b>Pollutant</b>	<b>Baseline Actual Emissions 2007/2008 (ton/year)</b>	<b>Projected Actual Emissions (ton/year)</b>	<b>Net Emissions Increase (ton/year)</b>	<b>Significant Emissions Increase Levels (ton/year)</b>
PM	224.8	170.5	-54.3	25
PM <sub>10</sub>	302.9	227.5	-75.4	15
PM <sub>2.5</sub>	225.0	167.9	-57.1	10
SO <sub>2</sub>	1172.6	788.2	-384.4	40
NO <sub>x</sub>	1527.1	1079.7	-447.4	40
CO	834.4	829.9	-4.5	100
VOC	13.7	9.3	-4.4	40
CO <sub>2e</sub>	1,279,185	775,305	-503,880	75,000

Paper production will increase as a result of this project, and there will be a change in VOC emissions from coating materials used in the paper mill. The change in PM and VOC emissions resulting from the increase in paper production and coating changes are shown in Table 3. The average annual paper mill production and coating usage from baseline years 2007/2008 and projected actual emissions were used in this analysis.

*Table 3 - No. 1, No.2 & No. 3 Paper Machine (due to product line changes)*

<b>Pollutant</b>	<b>Baseline Actual Emissions 2007/2008 (ton/year)</b>	<b>Projected Actual Emissions (ton/year)</b>	<b>Net Emissions Increase (ton/year)</b>	<b>Significant Emissions Increase Levels (ton/year)</b>
PM	17.29	18.14	0.85	25
PM <sub>10</sub>	41.8	47.90	6.10	15
PM <sub>2.5</sub>	38.9	43.62	4.72	10
VOC	47.2	33.41	-13.80	40

Projected actual emissions from the entire project include a marginal increase in PM from the increase in paper production, emissions increases from the natural gas coating dryer burners, VOC emissions changes from paper coating materials, and emissions associated with the increased steam demand from Power Boilers #1 and #2. These comparison results show that none of the pollutants will experience a significant increase as a result of this project.

Net emission increases are determined by subtracting the baseline actual emissions over any 24-month period representative of normal operation within the ten years preceding the modification from the projected actual emissions. In accordance with 06-096 C.M.R. ch. 100(15)(b), January 2007 through December

2008 was identified by SDW as the consecutive 24-month period representative of normal operations for all regulated pollutants from the No. 1 PM and was thus selected as baseline actual emissions.

*Table 4 - Total Project Net Emission Increase Summary*

<b>Pollutant</b>	<b>Baseline Actual Emissions 2007/2008 (ton/year)</b>	<b>Projected Actual Emissions (ton/year)</b>	<b>Net Emissions Increase (ton/year)</b>	<b>Significant Emissions Increase Levels (ton/year)</b>
PM	242.1	188.9	-53.1	25
PM <sub>10</sub>	344.7	276.5	-68.3	15
PM <sub>2.5</sub>	264.0	212.6	-51.3	10
SO <sub>2</sub>	1,172.6	788.3	-384.3	40
NO <sub>x</sub>	1,527.1	1,090.4	-436.7	40
CO	834.4	841.4	6.9	100
VOC	60.9	43.5	-17.4	40
CO <sub>2</sub> e	1,279,185	792,149	-487,037	75,000

Note: The above values are for the No. 1 PM Rebuild Project, which includes a review of the energy demand changes due to the project, the paper machine product line changes and the changes due to the addition of the natural gas burners for the size press and coating dryers. Projected actual emissions are based on design production rates. None of the other equipment at the facility is affected by this NSR license.

Therefore, this NSR license is determined to be a minor modification under *Minor and Major Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 since the changes being made are not addressed or prohibited in the Part 70 air emission license and the net change in tons per year emissions for any pollutant will not exceed the significance levels as demonstrated above.

An application to incorporate the requirements of this NSR license into the Part 70 air emission license shall be submitted no later than 12 months from commencement of the requested operation.

## II. BEST PRACTICAL TREATMENT (BPT)

### A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. Separate

control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

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

B. Best Available Control Technology (BACT)

The following is a summary of the BACT determination for the No. 1 PM rebuild, by pollutant.

1. Particulate Matter (PM, PM<sub>10</sub>, PM<sub>2.5</sub>)

PM emissions from the size press and coater dryers include emissions generated from the dryer burners firing natural gas. Potential control technologies for PM emissions include add-on control equipment, combustion of clean fuels and good combustion practices.

Add-on control for PM emissions includes baghouses, cyclones, wet scrubbers and electrostatic precipitators (ESPs). Due to the low PM concentrations in the dryer exhausts, baghouses, cyclones, and ESPs are not technically feasible for this application. A review of relevant BACT precedents identified multiple paper machines using venturi scrubbers to control dry end PM emissions. The use of a wet scrubber to control PM emissions from the dryers is a technically feasible option but typically not employed for coating dryer systems.

The Department finds that using good combustion practices, the use of clean fuels, and the combined limit of PM emissions of 0.16 lb/hr, and PM<sub>10</sub> and PM<sub>2.5</sub> emissions of 0.63 lb/hr from natural gas combustion constitutes BACT for PM emissions from the size press dryer and coating dryers.

2. Sulfur Dioxide (SO<sub>2</sub>)

Emissions of SO<sub>2</sub> from the size press and the coating dryers are attributable to the oxidation of sulfur compounds contained in the natural gas used to generate hot air in the dryer hoods. Control options to reduce emissions of SO<sub>2</sub> include flue gas desulfurization through the use of a wet scrubber or restricting the sulfur content of the fuel. The costs of a wet scrubbing system for a relatively small SO<sub>2</sub> source, including the associated annual operating costs for scrubbing media, energy, operation and maintenance render this control option as economically infeasible.

SDW proposes and the Department concurs that the use of natural gas and an SO<sub>2</sub> emission limit for the size press and coating dryers combined of 0.084 lb/hr represents BACT, based on the sulfur content of the fuel and emissions factors from recent BACT determinations on similar installations.

3. Nitrogen Oxides (NO<sub>x</sub>)

Emissions of NO<sub>x</sub> from the size press dryer and coater dryers are attributable to the oxidation of nitrogen in the combustion air and of nitrogen compounds contained in the natural gas used to generate hot air in the dryer sections. Options for controlling NO<sub>x</sub> emissions from the unit include combustion control techniques, add-on controls such as selective catalytic reduction (SCR), and selective non-catalytic reduction (SNCR), and the combustion of clean fuels.

The add-on control options of SNCR and SCR are primarily used on large industrial and utility boilers. A review of the relevant BACT precedents did not indicate any paper machine dryers using an add-on technology for NO<sub>x</sub> control. The cost of installing add-on controls, annual operating costs, added energy consumption and operation and maintenance costs render this option economically infeasible.

NO<sub>x</sub> can be controlled through combustion practices including low excess air firing and burner modification. Additional pollution control options include flue gas recirculation (FGR) and low-NO<sub>x</sub> burners. In an FGR system, a portion of the flue gas is recirculated back to the main combustion chamber, reducing thermal NO<sub>x</sub> formation by decreasing the peak flame temperatures. Typically, ductwork is run from the burner outlet duct to the combustion air duct. Low-NO<sub>x</sub> burners are typically utilized on medium-to-large industrial and utility boilers. A review of relevant BACT precedents did not identify any paper drying systems using FGR to control NO<sub>x</sub> emissions from the burner hoods. Additionally, the costs of installing, operating, and maintaining a FGR system is not economically feasible.

Low-NO<sub>x</sub> burners are both technically and economically feasible and SDW proposes the use of this combustion control practice as BACT. Combined with this technology, the facility will burn natural gas, which has an inherently low nitrogen content. SDW proposed to limit the combined NO<sub>x</sub> emissions from the size press and coater dryers to 6.3 lb/hr as BACT, based on recent BACT determinations on similar installations.

The Department finds the use of low NO<sub>x</sub> burners firing natural gas and a combined NO<sub>x</sub> emission limit for the size press dryer and coating dryers of 6.3 lb/hr to represent BACT.

4. Carbon Monoxide (CO)

The formation of CO occurs as a result of incomplete combustion of organic compounds contained in the natural gas used to generate hot air in the size press and coating dryers.

Based on the relatively small size of the fuel combustion source, it is not economically feasible to install add-on pollution control equipment to control CO from these units. No CO emission control technologies were identified that are technically feasible for application to these units, but several sources identified good combustion practices as BACT. Such practices include maintaining the air-to-fuel ratio at the manufacturer's specified setting and maintaining proper air and fuel pressures at the burners.

The Department finds that using good combustion practices and the combined limit for CO emissions of 6.7 lb/hr constitutes BACT for CO emissions from the size press and coating dryers.

5. Volatile Organic Compounds (VOC)

The paper machine and the associated operations are a source of emissions of VOC attributable to the volatilization of compounds in the various operations conducted. The increase in VOCs from this project will come primarily from the on-machine coating operations. The potential VOCs emitted from the paper machine are vented through the coating dryer hoods. The VOC emissions generated by the paper machine are currently uncontrolled.

The No. 1 Paper Machine is operated and equipped in a manner that is consistent with the existing state of technology for paper machines and associated process units. Consideration may be given, however, to the control of VOC emissions from this unit through capture and venting to a device such as a thermal oxidizer, adsorber, condenser, absorber or biofilter. However, no technology exists that can be considered acceptable for this application, for the following reasons:

The cost associated with installing and operating a thermal oxidizer of the size appropriate to handle the very high volume, high moisture content, and low VOC concentration emissions would be significant. Further, thermal oxidation is unproven in actual practice in controlling emissions from paper machines. The lack of demonstrated effectiveness for this type of application makes



thermal oxidation an infeasible option for BACT.

The technical feasibility of an absorber for this application is questionable, primarily because there are no available types of adsorption material that are capable of achieving effective control of the mixture of VOC compounds that are likely to be present in the emissions from the units associated with the papermaking operations. As with selective catalytic reduction (SCR), adsorption is unproven for this type of application, making it technically infeasible as an option for BACT.

Use of a condenser is not technically feasible for this application because the concentration of VOC in the emission stream would be too low and the moisture content in the emission stream would be too high to allow effective control by a condenser.

Like adsorption, absorption is not considered to be technically feasible based on the fact that there are no available types of absorption media that have been demonstrated to be capable of achieving effective control of emissions stream containing the mixture of VOC compounds that are likely to be present in the emissions capture from papermaking operations.

Biofiltration is not considered to be technically feasible for this application based on the fact that the pollutants that would be present would likely damage the filtration media. Further, biofiltration is unproven for this type of application making it technically infeasible as an option for BACT.

Finally, when the US Environmental Protection Agency (EPA) promulgated its "MACT III" standards, the EPA concluded that no emissions controls or emissions limits for existing or new papermaking operations are feasible. *See* 63 Fed. Reg. 18504 (April 15, 1998).

The coating applicators and associated dryers for No. 1 PM will meet BACT by the use of a clean fuel, namely natural gas. The only criteria pollutant resulting from the application and drying of coating formulations is VOCs. Considering the low level of emissions, add-on controls are not economically feasible. BACT for the dryer emissions will be met by the use of clean fuel (i.e., natural gas).

The Department finds the use of natural gas constitutes BACT for VOC emissions for coating applicators and associated dryers for No. 1 PM.

6. Periodic Monitoring

SDW shall maintain records of production and additives and coating used in the paper or substrate formation associated with No.1 PM. Annual production and VOC emissions based on site specific and industry emission factors are to be reported in the annual emissions reporting required in 06-096 C.M.R. ch. 137, *Emission Statements* and in Special Condition (41) of Air Emission License A-19-71-A- I (issued 12/4/2004).

C. Paper Coating Regulation (06-096 C.M.R. ch. 123)

Requirements of 06-096 C.M.R. ch. 123, *Paper Coating Regulation*, apply to roll, knife, meyer rod, or rotogravure coater(s) and drying oven(s) of paper coating lines at stationary sources of VOC emissions. This regulation does not apply to size presses and on-machine coaters on papermaking machines apply sizing or water-based clays. Since the No. 1 PM coating systems are on-machine coaters, the requirements of this regulation do not apply. [06-096 C.M.R. 123 (1)(C)(1)]

D. National Emission Standards for Hazardous Air Pollutants: the Paper and Other Web Coating, 40 C.F.R. Part 63, Subpart JJJ

The *National Emission Standards for Hazardous Air Pollutants: the Paper and Other Web Coating* category, 40 C.F.R. Part 63, Subpart JJJ, regulates paper machine coating operations. However, on-machine coaters, such as SDW's coaters, that apply sizing or water-based clays as a component of the papermaking system are not subject per EPA's applicability letter to the American Forest Paper Association dated November 19, 2003.

E. Emission Limits

The combined BACT emission limits from the combustion of natural gas in the No. 1 PM size press dryer and coater dryers are the following:

<b>PM<sup>1</sup> lb/hr</b>	<b>PM<sub>10</sub><sup>2</sup> lb/hr</b>	<b>PM<sub>2.5</sub><sup>2</sup> lb/hr</b>	<b>SO<sub>2</sub> lb/hr</b>	<b>NO<sub>x</sub> lb/hr</b>	<b>CO lb/hr</b>	<b>VOC lb/hr</b>
0.16	0.63	0.63	0.084	6.3	6.7	0.46

<sup>1</sup>PM limit does not include condensables

<sup>2</sup>PM<sub>10</sub> and PM<sub>2.5</sub> limits include condensables

Visible Emissions from the size press dryer exhaust and each of the coating dryer exhausts shall not exceed 10% opacity on the six-minute block average basis. [06-096 C.M.R. ch. 115, BACT]

F. Incorporation Into the Part 70 Air Emission License

The requirements in this 06-096 C.M.R. ch. 115 New Source Review license shall apply to the facility upon startup of No. 1 PM following the completion of the rebuild activities. Per *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140 § 1(C)(8), for a modification at the facility that has undergone NSR requirements or been processed through 06-096 C.M.R. ch. 115, the source must apply for an amendment to their Part 70 license within one year of commencing the proposed operations, as provided in 40 C.F.R. Part 70.5.

G. Annual Emissions

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

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
Package Boiler	0.5	0.5	--	22.5	4.5	1.2	0.1
Power Boiler #1	963.6	963.6	--	3,258.7	1,309.6	9,942.6	60.0
Power Boiler #2	170.8	170.8	--	1,537.4	1,138.8	2,277.6	39.9
Recovery Boiler	906.7	906.7	--	8650.5	3,285.0	13,634.9	65.7
Smelt Tanks #1 & #2	113.9	113.9	--	113.9	--	--	--
Lime Kiln	254.0	306.6	306.6	328.5	311.0	254.0	43.8
No. 2 Emergency Engine	0.1	0.1	--	0.1	1.8	1.1	0.1
No. 1 Paper Machine	0.7	2.8	2.8	0.4	27.6	29.3	2.0
<b>Total TPY</b>	<b>2,410.3</b>	<b>2,465.0</b>	<b>309.4</b>	<b>13,912.0</b>	<b>6,078.3</b>	<b>26,140.7</b>	<b>211.6</b>

Table Notes:

- \* PM<sub>10</sub>, PM<sub>2.5</sub>, and CO are not used in calculating the annual fee but are included for completeness.
- \* PM and VOC emissions do not include process emission units (e.g., woodyard) which have no license emissions limits.
- \* VOC lb/hr limits, lb/MMBtu limits, and VOC TPY emissions listed in this license are based on VOC emissions reported as carbon by EPA Method 25A.
- \* The PM<sub>10</sub> total for the lime kiln and the No. 1 Paper Machine Coating Dryers is calculated by the current definition which includes condensables. PM<sub>10</sub> totals for all other emission units above have not been adjusted at this time to include PM condensables.
- \* PM<sub>2.5</sub> totals for emission units other than the Lime Kiln and No. 1 PM above have not been included in the license at this time.

### III. AMBIENT AIR QUALITY ANALYSIS

SDW 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. A summary of that analysis is included in air emission license A-19-77-2-A dated June 2, 2008. This project does not result in an emissions increase requiring modeling. Therefore, an additional ambient air quality analysis is not required for this NSR license.

#### **ORDER**

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

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

The Department hereby grants New Source Review License A-19-77-11-A pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the standard and specific conditions below.

Severability. The invalidity or unenforceability of any provision of this License or part thereof shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

**SPECIFIC CONDITIONS**

- (1) SDW is licensed to rebuild No. 1 PM and install a size press dryer and each of the coating dryer equipped with natural gas-fired burners. The maximum heat input of the dryers are as follows:

<b>Equipment</b>	<b>Maximum Capacity (MMBtu/hr)</b>
Size Press Dryer	18.5
High Intensity Coating Dryer #1	10.2
Opti Dry Coating Dryer #1	11.6
High Intensity Coating Dryer #2	10.2
Opti Dry Coating Dryer #2	11.6
High Intensity Coating Dryer #3	10.2
Opti Dry Coating Dryer #3	11.6

- (2) SDW shall use good combustion practices, shall fire natural gas, and use low NOx burners on the No. 1 PM size press and coating dryers.
- (3) The combined emissions from the combustion of natural gas in the No.1 PM size press dryer and coating dryers shall not exceed the following:

<b>PM<sup>1</sup> lb/hr</b>	<b>PM<sub>10</sub><sup>2</sup> lb/hr</b>	<b>PM<sub>2.5</sub><sup>2</sup> lb/hr</b>	<b>SO<sub>2</sub> lb/hr</b>	<b>NO<sub>x</sub> lb/hr</b>	<b>CO lb/hr</b>	<b>VOC lb/hr</b>
0.16	0.63	0.63	0.084	6.3	6.7	0.46

<sup>1</sup>PM limit is without condensables  
<sup>2</sup>PM<sub>10</sub> and PM<sub>2.5</sub> limits include condensables

- (4) Visible Emissions from the size press dryer exhaust and each of the coating dryer exhausts shall not exceed 10% opacity on the six-minute block average basis. [06-096 C.M.R. ch. 115, BACT]
- (5) SDW shall maintain records of production and additives and coating used in the paper or substrate formation associated with No.1 PM. Annual production and VOC emissions based on site specific and industry emission factors are to be reported in the annual emissions reporting required by 06-096 C.M.R. ch. 137, *Emission Statements*.

- (6) The requirements in this 06-096 C.M.R. ch. 115 New Source Review license shall apply to the facility upon startup of No. 1 PM following the completion of the rebuild activities. SDW shall submit an application to incorporate this NSR license into the facility's Part 70 air emission license no later than 12 months from commencement of the requested operation. [06-096 C.M.R. ch. 140 § 1(C)(8)]

DONE AND DATED IN AUGUSTA, MAINE THIS 20 DAY OF April, 2017.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Paul Mercer  
PAUL MERCER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 10, 2017

Date of application acceptance: March 15, 2017

Date filed with the Board of Environmental Protection:

This Order prepared by Lisa P. Higgins, Bureau of Air Quality.

