



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI  
GOVERNOR

DAVID P. LITTELL  
COMMISSIONER

**S. D. Warren Company  
Somerset County  
Skowhegan, Maine  
A-19-77-4-M**

**Departmental  
Findings of Fact and Order  
New Source Review  
Amendment #3**

After review of the air emissions license amendment 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	S.D. Warren Company (SDW)
LICENSE TYPE	Chapter 115 Minor Revision
NAICS CODES	322121
NATURE OF BUSINESS	Pulp & Paper Manufacturer
FACILITY LOCATION	Skowhegan, Maine
NSR AMENDMENT ISSUANCE DATE	October 19, 2009

B. Amendment Description

SDW has requested a minor revision in order to align the frequency of stack testing with the State statute.

C. Application Classification

The application for SDW does not violate any applicable federal or state requirements. This application seeks to modify a Best Available Control Technology (BACT) analysis performed per New Source Review and modify other stack testing requirements in SDW's existing Part 70 air license.

This modification is determined to be a minor revision under *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 24, 2005) and has been processed as such.

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## 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 06-096 CMR 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 existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

### B. Adjusting Stack Test Frequency

SDW has requested that the stack testing frequency listed in the license be adjusted to reflect recent changes in Maine Statute. Specifically, 38 MRSA 589 Subsection 2 states that facilities shall not be required to stack test for chlorine or chlorine dioxide more than once every five years. In addition, facilities monitored by a Continuous Opacity Monitor (COM) or appropriate surrogate parameters as required by the commissioner shall not be required to stack test for PM more than once every five years. If visible emissions, operating parameters, federal requirements, or other information indicates that the source may be operating out of compliance, additional testing may be required upon request of the Department.

This change in statute has been determined to affect the following units at SDW: Power Boiler #1, Power Boiler #2, Lime Kiln, Recovery Boiler, and the Bleaching System.

## ORDER

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

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

The Department hereby grants Air Emission License A-19-77-4-M pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the standard and special conditions below.

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

**The following condition will replace Condition (15)(H) of Air Emission License A-19-70-A-I when amended:**

- (6) Compliance stack testing for PM for PB#1 shall be performed once by December 31, 2013 and once every five calendar years thereafter. [06-096 CMR 115, BPT and 38 M.R.S.A 589, Subsection 2] **Enforceable by State-only**

**The following condition will replace Condition (17)(F) of Air Emission License A-19-70-A-I when amended:**

- (7) Compliance stack testing for PM for PB#2 shall be performed once by December 31, 2013 and once every five calendar years thereafter. [06-096 CMR 115, BPT and 38 M.R.S.A 589, Subsection 2] **Enforceable by State-only**

**The following NSR conditions replace Condition (3)(L) of Air Emission License A-19-77-2-A and will replace Condition (18)(I) of Air Emission License A-19-70-A-I when amended:**

- (8) Compliance stack testing for PM for the Recovery Boiler while firing black liquor and operating less than 3 chambers shall be performed:
- A. within 12 months after startup of the Recovery Boiler upgrade project; and [06-096 CMR 115, BACT]

B. once every five calendar years thereafter. [06-096 CMR 115, BPT and 38 M.R.S.A 589, Subsection 2] **Enforceable by State-only**

**The following condition will replace Condition (20)(E) of Air Emission License A-19-70-A-I when amended:**

- (9) Compliance stack testing for PM for the Lime Kiln shall be performed once by December 31, 2013 and once every five calendar years thereafter. The compliance tests shall be performed on the Lime Kiln emissions prior to gas extraction by the PCC plant. [06-096 CMR 115, BPT and 38 M.R.S.A 589, Subsection 2] **Enforceable by State-only**

**The following conditions will replace Conditions (23)(B), (C), and (D) of Air Emission License A-19-70-A-I when amended:**

- (10) SDW shall perform compliance testing pursuant to the requirements of 06-096 CMR 122 (except for stack testing frequency) for the Central Absorber Scrubber by December 31, 2012 and once every five calendar years thereafter in accordance with NCASI Method 520 for sampling chlorine and chlorine dioxide. [06-096 CMR 122, 06-096 CMR 115, BPT and 38 M.R.S.A 589, Subsection 2] **Enforceable by State-only**
- (11) SDW shall perform compliance testing pursuant to 06-096 CMR 122 (except for stack testing frequency) while operating the Back-up Scrubber by December 31, 2012 and once every five calendar years thereafter (to the extent that SDW wishes to operate in this mode) in accordance with NCASI Method 520 for sampling chlorine and chlorine dioxide. [06-096 CMR 122, 06-096 CMR 115, BPT and 38 M.R.S.A 589, Subsection 2] **Enforceable by State-only**

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- (12) SDW shall perform compliance testing pursuant to 06-096 CMR 122 (except for stack testing frequency) while venting the S-10 tower to atmosphere once every five calendar years, to the extent SDW wishes to operate in this mode, in accordance with NCASI Method 520 for sampling chlorine and chlorine dioxide. [06-096 CMR 122, 06-096 CMR 115, BPT and 38 M.R.S.A 589, Subsection 2]  
**Enforceable by State-only**

DONE AND DATED IN AUGUSTA, MAINE THIS *19th* DAY OF *October* 2009.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *James P. Bookmyer*  
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DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 7/7/09

Date of application acceptance: 7/15/09

Date filed with the Board of Environmental Protection: \_\_\_\_\_

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

