



DEPARTMENT ORDER

**Woodland Pulp LLC
Washington County
Baileyville, Maine
A-215-77-16-M**

**Departmental
Findings of Fact and Order
New Source Review
NSR #16**

FINDINGS OF FACT

After review of the air emission license application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 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	Woodland Pulp LLC
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Revision
NAICS CODES	322121
NATURE OF BUSINESS	Pulp and Paper Mill
FACILITY LOCATION	144 Main Street, Baileyville, Maine 04694

B. NSR License Description

Woodland Pulp LLC (Woodland Pulp) has requested a New Source Review (NSR) license to extend its 18-month deadline to commence construction for two new tissue machines (TM3 and TM4) addressed in NSR license A-215-77-15-A (issued July 27, 2018).

C. 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 submitted by Woodland Pulp does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements.

The proposed revision will not change the facility's emission limits. Therefore, the NSR license is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 Code of Maine Rules (C.M.R.) ch. 115. The procedures found in 06-096 C.M.R. ch. 115 can be utilized to process this application since the proposed revision is not prohibited by the Part 70 air emission license. 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.

D. Construction Timeframe Extension

NSR License A-215-77-15-A, issued July 27, 2018, approved the construction and operation of two new tissue machines (TM3 and TM4) at the Baileyville facility. Standard Statement (1) of Air Emission License A-215-70-I-R/A, issued November 18, 2011, establishes an original construction timeframe of 18 months after approval to construct, as follows:

*(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 C.M.R. ch. 140]*

Woodland Pulp's original 18-month timeframe for commencing construction began on July 27, 2018 with the issuance of NSR license A-215-77-15-A and will end on January 27, 2020. Woodland Pulp has requested permission to extend this timeframe in order to evaluate all business and market considerations to optimize expenditures at the facility. The BACT analysis included in license A-215-77-15-A remains the most applicable control technologies, operating practices, and emission limits for the facility. Woodland Pulp has demonstrated reasonable justification for a delay, and the Department has elected to extend the allowable construction period by an additional 18 months. As of the issuance of this NSR license, Woodland Pulp shall have until July 27, 2021, to commence construction on TM3 and TM4 as addressed by NSR license A-215-77-15-A.

E. Annual Emissions

This NSR license will not result in a change in annual emission limits for any pollutants.

ORDER

The Department hereby grants New Source Review Minor Revision A-215-77-16-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the 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) The Department grants an 18-month construction timeframe extension to Woodland Pulp to commence construction on TM3 and TM4 addressed in NSR license A-215-77-15-A. If Woodland Pulp does not commence construction prior to July 27, 2021, approval to construct shall become invalid, and Woodland Pulp shall be required to apply for an NSR license amendment to re-address BACT for these changes. [06-096 C.M.R. ch. 115 § (3)(E)(5)(c)]
- (2) Woodland Pulp 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 2nd DAY OF January, 2020.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: [Signature] for
GERALD D. REID, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: December 17, 2019
Date of application acceptance: December 18, 2019

Date filed with the Board of Environmental Protection:

This Order prepared by Benjamin Goundie, Bureau of Air Quality.

