



DEPARTMENT ORDER

**Woodland Pulp LLC
Washington County
Baileyville, Maine
A-215-70-R-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #6**

FINDINGS OF FACT

After review of the Part 70 License amendment 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 (Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Woodland Pulp LLC
LICENSE TYPE	Part 70 Administrative Revision
NAICS CODES	32211
NATURE OF BUSINESS	Pulp Production
FACILITY LOCATION	144 Main Street, Baileyville, Maine

Woodland Pulp LLC (Woodland Pulp) has requested an administrative revision to their Part 70 license to streamline the frequency of particulate matter (PM) performance testing for Power Boiler #9.

B. 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.

A Part 70 Administrative Revision is for license changes that correct typographical errors; change the name, address, or phone number of any person or facility identified in the Part 70 license or a similar administrative change at the Part 70 source; or result in more frequent monitoring, reporting, recordkeeping or testing requirements. The requested revision to streamline the PM stack testing frequency corresponds to the definition of a Part 70 Administrative Revision and has been processed under *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

II. ADMINISTRATIVE REVISION DESCRIPTION

Woodland Pulp's current Part 70 license requires performance testing be conducted on Power Boiler #9 every calendar year. However, the statutory requirement in 38 M.R.S. § 589(2) reads as follows:

A person is not required to conduct stack tests for particulate matter on a source monitored by a continuous monitoring device for opacity as specified by 40 Code of Federal Regulations, Part 60, Appendix B, specification 1 or appropriate surrogate parameters as required by the commissioner more frequently than once every 5 years unless visible emissions, operating parameters, or other information indicates the source may be operating out of compliance with any applicable emission standard or unless there are more stringent federal requirements. If visible emissions, operating parameters, or other information indicates potential noncompliance with an air emission standard, or if there are more stringent federal requirements, the Department may require additional stack tests.

Although Woodland Pulp does not continuously monitor Power Boiler #9 for opacity, it does monitor other surrogate parameters for PM as required by *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, 40 C.F.R. Part 63, Subpart DDDDD. Therefore, State requirements do not require PM performance testing to take place more frequently than once every five years.

There are Federal requirements for PM performance testing contained in 40 C.F.R. Part 63, Subpart DDDDD. Specifically, § 63.7515 requires Woodland Pulp to test Power Boiler #9 for PM annually. However, if there are at least two consecutive years where the results of performance testing are at or below 75% of the emission limit contained in Subpart DDDDD, the interval for performance testing can be extended to up to 37 months between tests.

In New Source Review (NSR) license A-215-77-3-M (issued 11/5/10) Woodland Pulp revised their Reasonably Available Control Technology (RACT) determination for Power Boiler #9. Emission limits were modified to the current limits of 0.22 lb/MMBtu and 84.4 lb/hr. The PM emission limit for Power Boiler #9 in Subpart DDDDD is 0.44 lb/MMBtu. Therefore, it is not possible for a performance test to exceed 75% of the Subpart DDDDD emission limit for PM and still be in compliance with the federally-enforceable RACT emission limit contained in Woodland Pulp's license.

The Department approves Woodland Pulp's request to streamline the frequency of PM performance testing to the requirements in 40 C.F.R. Part 63, Subpart DDDDD.

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; and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License Amendment A-215-70-R-A pursuant to 06-096 C.M.R. 140 and the preconstruction permitting requirements of *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 and subject to the conditions found in Air Emission License A-215-70-I-R/A, in amendments A-215-70-K-A, A-215-70-L-A, A-215-70-M-A, and A-215-70-N-A, and the following conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 C.M.R. ch. 115 for making such changes and pursuant to the applicable requirements in 06-096 C.M.R. ch. 140.

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

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

SPECIFIC CONDITIONS

The following shall replace Condition (37)(B) of Air Emission License A-215-70-I-R/A:

(37) Stack Testing

B. Power Boiler #9 – PM Performance Tests

1. Except as provided for in the next paragraph, Woodland Pulp shall conduct performance stack tests for PM annually. Annual performance

- tests must be completed no more than 13 months after the previous performance test [40 C.F.R. § 63.7515(a)]
2. If the performance tests for PM for at least two consecutive years show that emissions are at or below 75% of the emission limit contained in 40 C.F.R. Part 63, Subpart DDDDD (i.e., results of 0.33 lb/MMBtu or less), and there are no changes in the operation of Power Boiler #9 or its associated air pollution control equipment that could increase emissions, Woodland Pulp may elect to conduct performance tests for that pollutant every third year. The subsequent performance tests must be conducted no more than 37 months after the previous performance test. [40 C.F.R. § 63.7515(b)]
 3. If a performance test for PM shows emissions exceed 75% of the emission limit contained in 40 C.F.R. Part 63, Subpart DDDDD, Woodland Pulp shall resume conducting annual performance testing for PM until all performance stack tests for over a 2-year period are at or below 75% of the emission limit. [40 C.F.R. § 63.7515(c)]

DONE AND DATED IN AUGUSTA, MAINE THIS 3 DAY OF October, 2017.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Curie for
PAUL MERCER, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-215-70-I-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 8/18/17
Date of application acceptance: 8/21/17

Date filed with the Board of Environmental Protection:

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

