STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

DEPARTMENT ORDER

Huhtamaki, Inc. **Kennebec County** **Waterville, Maine** **A-416-70-I-R**	**Departmental** **Findings of Fact and Order** **Part 70 Air Emission License** **Renewal**

FINDINGS OF FACT

After review of the Part 70 License renewal 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	Huhtamaki, Inc.
LICENSE TYPE	Part 70 License Renewal
NAICS CODES	322299
NATURE OF BUSINESS	Converted Paper Products Manufacturing
FACILITY LOCATION	242 College Avenue, Waterville, Maine

Huhtamaki is a molded pulp products facility consisting of fiber processing, forming, drying, and laminating operations run using boilers and other associated process equipment.

Huhtamaki has the potential to emit more than 100 tons per year (TPY) sulfur dioxide (SO_2) and nitrogen oxides (NO_X); therefore, the source is a major source for criteria pollutants. Huhtamaki does not have the potential to emit 10 TPY or more of a single hazardous air pollutant (HAP) or 25 TPY or more of combined HAP; therefore, the source is an area source for HAP.

B. Emission Equipment

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

External Combustion Units

Equipment	Max. Input Capacity (MMBtu/hr)	Max. Firing Rate	Fuel Type, % sulfur	Installation Date	Stack #
Boiler #2	32.6	32 Mscf/hr	Natural Gas, Negligible Sulfur	1959	1
	29.3	195.3 gal/hr	#6 Fuel Oil, 0.7% by weight		
Boiler #3	32.6	32 Mscf/hr	Natural Gas, Negligible Sulfur	1950	
	29.3	195.3 gal/hr	#6 Fuel Oil, 0.7% by weight		
Boiler #5	71.3	69.9 Mscf/hr	Natural Gas, Negligible Sulfur	1966	3
	64.8	432 gal/hr	#6 Fuel Oil, 0.7% by weight		

Internal Combustion Units

Equipment	Max. Input Capacity (MMBtu/hr)	Max. Firing Rate (gal/hr)	Fuel Type, % sulfur	Installation Date
Fire Pump	1.2	8.9	Distillate Fuel, 0.0015% by weight	1966

Process Equipment / Tanks

Equipment	Unit Type	Number of Units	Size / Max. Process Rate
Product Dryers-Rough	Process Steam Dryers	8	50,000 tons/year
Product Dryers-Smooth	Process Electric Dryers	33	65,000 tons/year
Bead Blaster	Process Equipment	1	N/A
Hydropulper	Process Equipment	1	52,500 gallons/year
Lamination	Process Equipment	11	20,000 tons/year
Parts Washers	Process Equipment	3	25 gallons each
Sodium Hypochlorite Tank	Storage Tank	1	5,252 gallons
#6 Fuel Oil Tanks	Storage Tank	2	40,000 gallons each

Huhtamaki has additional insignificant activities which do not need to be listed in the emission equipment tables 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 C.M.R. ch. 140.

C. Definitions

Distillate Fuel. For the purposes of this license, *distillate fuel* means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;
- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

Specification Waste Oil. For the purposes of this license, *specification waste oil* is petroleum-based oil which, through use or handling, has become unsuitable for its original purpose due to the presence of impurities or loss of original properties. It must have sufficient liquid content to be free flowing. It must also not otherwise exhibit hazardous waste characteristics or be mixed with a hazardous waste. The following are not considered specification waste oil:

- Oily waste debris generated from the clean-up of oil spills;
- Water generated from oil/water separation processes at a waste oil facility;
- Mineral spirits having a flash point less than 60°C (140°F).

[06-096 CMR 860(3)(s), (4)(A,B)]

Portable Engine. For the purposes of this license, *portable engine* means an internal combustion engine which is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform. This definition does NOT include engines which remain or will remain at a location (excluding storage locations) for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source. A location is any single site at a building, structure, facility, or installation. Any engine that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period.

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 Huhtamaki does not include the installation of new or modified equipment, and the annual emission restrictions increase only as a result of the

quantification and limiting of emissions from existing emission sources; therefore, the license is considered to be a Part 70 License renewal issued under *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 140.

E. Facility Description

Huhtamaki, Inc. is a molded pulp products manufacturing facility consisting of fiber processing, forming, drying, and laminating operations. Huhtamaki uses recycled newsprint, food board, milk carton stock, and other similar paper materials to produce molded pulp products. Cellulose fibers are mechanically cleaned and vacuum-drawn from liquid slurry into pre-shaped wire dies, where they are formed, compressed, and dried into finished products. Finished products include (but are not limited to) paper plates, pizza trays, food trays, and other similarly molded products. A small portion of the products are laminated with a plastic film.

F. General Facility Requirements

Huhtamaki is subject to the following state and federal regulations listed below, in addition to the regulations listed for specific units as described further in this license.

CITATION	REQUIREMENT TITLE
06-096 C.M.R. ch. 101	Visible Emissions Regulation
06-096 C.M.R. ch. 102	Open Burning
06-096 C.M.R. ch. 103	Fuel Burning Equipment Particulate Emission Standard
06-096 C.M.R. ch. 105	General Process Source Particulate Emission Standard
06-096 C.M.R. ch. 106	Low Sulfur Fuel Regulation
06-096 C.M.R. ch. 109	Emergency Episode Regulations
06-096 C.M.R. ch. 110	Ambient Air Quality Standards
06-096 C.M.R. ch. 116	Prohibited Dispersion Techniques
06-096 C.M.R. ch. 117	Source Surveillance – Emissions Monitoring
06-096 C.M.R. ch. 130	Solvent Cleaners
06-096 C.M.R. ch. 137	Emission Statements
06-096 C.M.R. ch. 138	Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides
06-096 C.M.R. ch. 140	Part 70 Air Emission License Regulations
40 C.F.R. Part 61, Subpart M	National Emission Standard for Asbestos
40 C.F.R. Part 63, Subpart ZZZZ	National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 63, Subpart JJJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
40 C.F.R. Part 70	State Operating Permit Programs
40 C.F.R. Part 98	Mandatory Greenhouse Gas Reporting

Note: C.M.R. = Code of Maine Regulations
C.F.R. = Code of Federal Regulations

G. Units of Measurement

The following units of measurement are used in this license:

CO_2e	-	carbon dioxide equivalent
gal/hr	-	gallons per hour
gal/yr	-	gallons per year
lb/1000gal	-	pounds per 1000 gallons
lb/hr	-	pounds per hour
lb/MMBtu	-	pounds per million British Thermal Units
lb/MMscf	-	pounds per million standard cubic feet of gas
MMBtu/hr	-	million British Thermal Units per hour
MMscf/hr	-	million standard cubic feet of gas per hour
MMscf/yr	-	million standard cubic feet of gas per year
Mscf/hr	-	thousand standard cubic feet of gas per hour
ppmv	-	parts per million by volume
psig	-	pounds per square inch gage (relative to atmosphere)
scf	-	standard cubic feet of gas
tpy	-	tons per year

II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

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 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 emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. NO_x RACT (Reasonably Available Control Technology)

Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides, 06-096 C.M.R. ch. 138 (NO_x RACT) is applicable to sources that have the potential to emit quantities of NO_X equal to or greater than 100 tons/year. Amendment A-416-72-B-A, issued to the facility on 01/19/1996, addressed NO_x RACT requirements which were subsequently amended in A-416-70-A-I (01/15/2002), A-416-70-B-A (06/02/2004),

A-416-70-F-A (05/15/2012), A-416-70-D-R (10/09/2012), and A-416-70-G-A (09/24/2013). NOx RACT is applicable to Boilers #2, #3, and #5, but not to the Fire Pump due to its 500-hour operating limit. Boilers #2 and #3 are required to meet NO_x RACT with the operation and calibration of automatic boiler controls, and Boiler #5 was required to meet NOx RACT with the retrofitting of a low-NOx burner and is required to test for NOx and meet a 0.40 lb/MMBtu emission limit. The NO_x RACT requirements are incorporated in this renewal.

C. Mandatory Greenhouse Gas (GHG) Reporting

Federal regulation *Mandatory Greenhouse Gas Reporting,* 40 C.F.R. Part 98, which contains GHG reporting and related monitoring and recordkeeping requirements, is applicable to the owners/operators of any facility which falls into any one of the following three categories, per *General Provisions, Who must report?*, 40 C.F.R. § 98.2.

(a)(1) A facility that contains any source category that is listed in Table A–3 of this subpart in any calendar year starting in 2010.

(a)(2) A facility that contains any source category that is listed in Table A–4 of this subpart and that emits 25,000 metric tons CO_2e or more per year in combined emissions from stationary fuel combustion units, miscellaneous uses of carbonate, and all applicable source categories that are listed in Table A–3 and Table A–4 of this subpart.

(a)(3) A facility that in any calendar year starting in 2010 meets all three of the conditions listed in this paragraph (a)(3). For these facilities, the annual GHG report must cover emissions from stationary fuel combustion sources only.

(i) The facility does not meet the requirements of either paragraph (a)(1) or (a)(2) of this section.

(ii) The aggregate maximum rated heat input capacity of the stationary fuel combustion units at the facility is 30 MMBtu/hour or greater.

(iii) The facility emits 25,000 metric tons CO_2e or more per year in combined emissions from all stationary fuel combustion sources.

If Huhtamaki burns more than 1,932,517 gallons of fuel oil, 417 MMscf of natural gas, or any applicable combination of the two (based on CO_2 emission factors of 120,000 lb/MMscf for natural gas and 25,873 lb/1000 gal for fuel oil) in a calendar year, the facility will meet all three conditions listed in paragraph (a)(3) above and will be subject to the recordkeeping and reporting requirements of 40 C.F.R. Part 98.

This facility shall fulfill the applicable recordkeeping and reporting requirements of 40 C.F.R. Part 98.

D. NSR/BACT Review

The Department issued Air License A-416-77-1-A on 03/23/2012 to Huhtamaki. The license was issued to permit the firing natural gas as the primary fuel in addition to #6 fuel oil in Boiler #5. The license was issued pursuant to federal New Source Review (NSR) requirements and the Department's air licensing requirements for minor modifications. Huhtamaki has modified additional equipment and processes and has undergone the appropriate air licensing procedures to address these changes. Additional NSR licenses were issued including A-416-77-2-A on 09/20/2012 to license Boilers #2 and #3 to burn natural gas, and A-416-77-3-M on 06/11/2013 to revise calculations and calculation methods in the other two NSR licenses.

E. Compliance Assurance Monitoring (CAM)

Compliance Assurance Monitoring, 40 C.F.R. Part 64 is applicable to units at major sources if the unit has emission limits, a control device to meet the limits, and pre-control emissions greater than 100 tons/year for any pollutant. [40 C.F.R. Part 64 § 64.2(b)]

None of the units at Huhtamaki utilize control devices to comply with emission limits; therefore, they are all not subject to 40 C.F.R. Part 64.

F. Fuel Makeup Requirements

1. Specification Waste Oil Requirements

Huhtamaki is licensed to fire natural gas, #6 fuel oil, and specification waste oil in Boilers #2, #3, and #5. The facility shall meet the following requirements for specification waste oil:

- All waste oil fired in the boilers shall meet the criteria of "specification waste oil" as defined in *Waste Oil Management Rules,* 06-096 C.M.R. ch. 860 (as stated in the Definitions section of this license).
- Huhtamaki shall maintain testing records of a representative sample of the waste oil utilized, demonstrating that the waste oil meets the definition found in 06-096 C.M.R. ch. 860 (as stated in the Definitions section of this license).
- Huhtamaki shall submit a representative waste oil analysis to the Department upon request.

For consistency, all additional monitoring requirements for the specification waste oil are listed in the periodic monitoring sections for the boilers.

2. Removed Specification Waste Oil Requirements

Air Emission License A-416-71-D-R (10/09/2012) incorporated the following two new BPT conditions for specification waste oil:

- All waste oil fired in the boilers shall be generated on site.

- Huhtamaki shall only fire waste oil in the boilers that has been mixed with #6 fuel oil at the facility.

Because of the reduction in the facility's sulfur limits associated with residual oil, the establishment of a comparable lower sulfur limit for specification waste oil, and the variability/unpredictability of potential oil mixes, the Department has determined that these requirements no longer provide any environmental benefit and will be removed from this license

3. Starting Fuel

Huhtamaki has previously been licensed to start Boilers #2, #3, and #5 with propane or distillate fuel. Since the natural gas conversions of the boilers, the facility has been able to use natural gas to start the boilers.

4. Fuel Sulfur Content

Huhtamaki is licensed to fire distillate fuel. Per 38 M.R.S. § 603-A(2)(A)(3), as of July 1, 2018, no person shall import, distribute, or offer for sale any distillate fuel with a sulfur content greater than 0.0015% by weight (15 ppm). Therefore, the distillate fuel purchased or otherwise obtained for use at this facility shall not exceed 0.0015% by weight (15 ppm). Because all emission units at Huhtamaki that fire distillate fuel are already required to meet the updated fuel specifications, no changes are necessary.

Huhtamaki is licensed to fire residual fuel (#6 fuel oil). The sulfur content of residual fuel was previously limited to 1.7% by weight per 06-096 C.M.R. ch. 140, BPT (streamlined for Boilers #2 and #3). However, per 38 M.R.S. § 603-A(2)(A)(1) and (2), as of July 1, 2018, no person shall import, distribute, or offer for sale any residual fuel oil with a sulfur content greater than 0.5% by weight. Therefore, the residual fuel purchased or otherwise obtained for use at this facility shall not exceed 0.5% by weight.

Huhtamaki is licensed to fire specification waste oil in the boilers. The sulfur content of waste oil mixed with #6 fuel oil was previously limited to 1.7% by weight per 06-096 C.M.R. ch. 140, BPT (streamlined for Boilers #2 and #3). However, as of July 1, 2018, specification waste oil purchased or otherwise obtained for use at this facility is limited to a maximum sulfur content of 0.7% by weight for the waste oil per 06-096 C.M.R. ch. 140, BPT.

Fuel oil acquired prior to the sulfur limit changes may still be burned after July 1, 2018.

Specific monitoring requirements for fuel sulfur content are included in the periodic monitoring section for each unit.

5. Fuel Nitrogen Requirement

Air Emission License A-416-70-A-I (01/15/2002) incorporated fuel nitrogen monitoring requirements, with no nitrogen limit, in an attempt to establish NO_x

emission limits based on the nitrogen content of the fuel oil and stack test information. At the time, it was believed that fuel-bound nitrogen levels had a significant impact on NO_x emissions from fuel oil combustion, however, it has since been demonstrated that NO_x emissions are influenced by a much greater extent by thermal NO_x production due to the high percentage of nitrogen in the combustion air.

Because of the consistency of commercial fuel production and delivery and the inability to adequately estimate NO_x emissions from fuel nitrogen content due to the significance of thermal NO_x, and because the nitrogen monitoring requirements are not connected to any limit, the Department has determined that the fuel nitrogen monitoring requirements are no longer environmentally beneficial and can be removed.

G. Boilers #2 and #3

Boilers #2 and #3 are operated to provide heat and steam for processes at the facility. Boiler #2 is a Babcock and Wilcox boiler that was installed in 1959. It was designed with a maximum heat input capacity of 29.3 MMBtu/hr, firing oil. Boiler #3 is a Babcock and Wilcox boiler that was installed in 1950. Boiler #3 was also designed with a maximum heat input capacity of 29.3 MMBtu/hr, firing oil. When firing natural gas, the boilers have higher maximum input capacities of 32.6 MMBtu/hr.

Both boilers combust natural gas and #6 fuel oil with a maximum sulfur content of 1.7%, by weight (fuel purchased prior to July 1, 2018). Specification waste oil that is generated on-site is mixed with the #6 fuel oil in the oil storage tanks. The boilers utilize natural gas for start-up, regardless of which fuel is being used for steady-state operations.

Emissions from Boilers #2 and #3 exit through Stack #1, which has an inside diameter of 60 inches and above ground level (AGL) height of 203 feet.

1. New Source Performance Standards (NSPS)

   Boilers #2 and #3 are both not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Dc due to their ages. This standard applies to steam generating units with a heat input capacities of 10 MMBtu/hr or more that are constructed after June 9, 1989, and the boilers were installed in 1959 and 1950, respectively.

2. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

   40 C.F.R. Part 63, Subpart DDDDD
   Boilers #2 and #3 are not subject to *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 because Huhtamaki is not a major source of HAP.

40 C.F.R. Part 63, Subpart JJJJJJ
Boilers #2 and #3 are subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ and they are considered oil-fired units rated higher than 10 MMBtu/hr. However, because the boilers primarily fire natural gas and because gas-fired units are exempt from the subpart, Huhtamaki may elect to re-classify the boilers according to § 63.11225(g) and therefore exempt the boilers from the rule. [40 C.F.R. §§ 63.11193 and 63.11195]

Applicable requirements of 40 C.F.R. Part 63, Subpart JJJJJJ are addressed in Section II.I of the Findings of Fact, titled "Boilers #2, #3, and #5 NESHAP Requirements". Included, also, in that section is a discussion of current applicability.

3. NO_x RACT

Huhtamaki is required to operate an automated combustion control system for Boilers #2 and #3 (O_2 trim). This replaces the tune-up requirements listed in 06-096 C.M.R. ch. 138(L) based on the findings of a 2009 petition.

4. Emission Limits and Streamlining

For Boilers #2 and #3, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below. The following limits are for each boiler except as specified for Natural Gas, where limits are for combined emissions for boilers from Stack #1.

<table>
<tr><th>Pollutant</th><th>Residual Fuel</th><th>Natural Gas</th><th colspan="2">Licensed Emission Limit(s)</th></tr>
<tr><td rowspan="5">PM</td><td colspan="2">0.20 lb/MMBtu
06-096 C.M.R. ch. 103 § 2.A.(1)</td><td colspan="2">Both Fuels</td></tr>
<tr><td colspan="2">0.15 lb/MMBtu
06-096 C.M.R. ch. 140, BPT</td><td colspan="2" rowspan="2">0.15 lb/MMBtu *</td></tr>
<tr><td rowspan="3">4.4 lb/hr
A-416-70-A-I
(01/15/2002), BPT</td><td rowspan="3">0.48 lb/hr Combined
A-416-77-2-A
(09/20/2012), BACT</td></tr>
<tr><td>#6 Fuel Oil</td><td>Nat. Gas</td></tr>
<tr><td>4.4 lb/hr</td><td>0.48 lb/hr Combined</td></tr>
<tr><td rowspan="2">PM_{10}</td><td colspan="2" rowspan="2">0.15 lb/MMBtu
A-416-70-A-I, issued 01/15/2002</td><td colspan="2">Both Fuels</td></tr>
<tr><td colspan="2">0.15 lb/MMBtu</td></tr>
</table>

Pollutant	Residual Fuel	Natural Gas	Licensed Emission Limit(s)	
	4.4 lb/hr A-416-70-A-I (01/15/2002), BPT	0.48 lb/hr **Combined** A-416-77-2-A (09/20/2012), BACT	**#6 Fuel Oil**	**Nat. Gas**
			4.4 lb/hr	**0.48 lb/hr Combined**
SO_2	52 lb/hr A-416-70-A-I (01/15/2002), BPT	0.04 lb/hr **Combined** A-416-77-2-A (09/20/2012), BACT	**#6 Fuel Oil**	**Nat. Gas**
			52 lb/hr[1]	**0.04 lb/hr Combined**
NO_x	13.2 lb/hr A-416-70-A-I (01/15/2002), BPT	10.08 lb/hr **Combined** A-416-77-2-A (09/20/2012), BACT	**#6 Fuel Oil**	**Nat. Gas**
			13.2 lb/hr	**10.08 lb/hr Combined**
CO	1.0 lb/hr A-416-70-A-I (01/15/2002), BPT	5.38 lb/hr **Combined** A-416-77-2-A (09/20/2012), BACT	**#6 Fuel Oil**	**Nat. Gas**
			1.0 lb/hr	**5.38 lb/hr Combined**
VOC	0.25 lb/hr A-416-70-A-I ((01/15/2002), BPT	0.35 lb/hr **Combined** A-416-77-2-A (09/20/2012), BACT	**#6 Fuel Oil**	**Nat. Gas**
			0.25 lb/hr	**0.35 lb/hr Combined**

Table Notes: **** streamlining requested***

[1] Because Huhtamaki is permitted to fire residual fuel and specification waste oil purchased or generated prior to July 1, 2018 with sulfur contents above 0.5% and 0.7% by weight, respectively, the lb/hr limit will remain consistent with the previously licensed sulfur content of 1.7% by weight.

Visible Emissions

<table>
<tr><td rowspan="2">Boiler #2
and
Boiler #3</td><td>30% opacity on a 6-minute block average basis

06-096 C.M.R. ch. 140, BPT</td><td>10% opacity on a 6-minute block average basis

06-096 C.M.R. ch. 140, BPT</td><td rowspan="3">Visible Emissions from Stack #1 shall not exceed 30% opacity on a 6-minute block average basis when either boiler is firing #6 fuel oil or when both are operating, or 10% opacity on a 6-minute block average basis when only one is operating and firing Natural gas *</td></tr>
<tr><td>30% opacity on a 6-minute block average basis, except for no more than 2, 6-minute block averages in a 3-hour period

06-096 C.M.R. ch. 101,
§ 2(B)(1)(a)(i)
And
A A-416-70-A-I (01/15/2002), BPT</td><td>10% opacity on a 6-minute block average, except for no more than 2, 6-minute block averages in a 3-hour period

06-096 C.M.R. ch. 101,
§ 2(B)(1)(a)(i)
And
A-416-77-2-A (09/20/2012), BACT</td></tr>
<tr><td rowspan="2">Stack #1</td><td colspan="3">Both #6 Fuel Oil | Both Nat. Gas | One of Each
30% opacity on a 6-minute block average basis

06-096 C.M.R. ch. 140, BPT</td></tr>
<tr><td colspan="3">30% opacity on a 6-minute block average basis, except for no more than 2, 6-minute block averages in a 3-hour period

06-096 C.M.R. ch. 101,
§ 2(B)(5)(a)(i)
And
A-416-77-2-A (09/20/2012), BACT</td></tr>
</table>

Table Notes: ***streamlining requested***

5. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boilers #2 and #3 shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department.

Pollutant	Unit of Standard	Compliance Method	Frequency
PM	lb/MMBtu; lb/hr	40 CFR Part 60, App. A, Method 5	As requested
PM_{10}		40 CFR Part 60, App. A, Method 5 or EPA Test Method 201 or 201A	

Pollutant	Unit of Standard	Compliance Method	Frequency
SO_2	lb/hr	40 CFR Part 60, App. A, Method 6	As requested
NO_X		40 CFR Part 60, App. A, Method 7	
CO		40 CFR Part 60, App. A, Method 10	
VOC		40 CFR Part 60, App. A, Method 25 or 25A	
Visible Emissions	% opacity	40 C.F.R. Part 60, App. A, Method 9	As requested

6. Periodic Monitoring

Huhtamaki shall monitor and record the values for Boilers #2 and #3 indicated in the following table.

Values	Units of Measure	Frequency	Origin and Enforceability
#6 fuel oil use	Gallons	Monthly and 12 month rolling total	A-416-70-A-I (01/15/2002), BPT
#6 fuel oil sulfur content	Percent, by weight	Each fuel purchase	A-416-70-A-I (01/15/2002), BPT
Specification waste oil use	Gallons	Monthly and 12-month rolling total	A-416-70-A-I (01/15/2002), BPT
Specification waste oil sulfur content	Percent, by weight	Once per calendar year	A-416-70-A-I (01/15/2002), BPT

7. Parameter Monitors

There are no Parameter Monitors required for Boilers #2 and #3.

8. CEMS and COMS

There are no CEMS or COMS required for Boilers #2 and #3.

H. Boiler #5

Boilers #5 is operated to provide heat and steam for processes at the facility. Boiler #5 is a Babcock and Wilcox boiler that was installed in 1966. It was designed with a maximum heat input capacity of 64.8 MMBtu/hr firing oil and has a maximum heat input capacity of 71.3 MMBtu/hr when firing natural gas. Boiler #5 combusts natural gas, #6 fuel oil with a maximum sulfur content of 1.7%, by weight (fuel purchased prior to July 1, 2018), and

specification waste oil that is generated on-site and mixed with the #6 fuel oil in the oil storage tanks. The boiler utilizes natural gas for start-up, regardless of which fuel is being used for steady-state operation.

Emissions exit through Stack #3, which has an inside diameter of 60 inches and above ground level (AGL) height of 203 feet.

1. New Source Performance Standards (NSPS)

   Boiler #5 is not subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Dc because of its age. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more that are constructed after June 9, 1989.

2. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

   40 C.F.R. Part 63, Subpart DDDDD
   Boiler #5 is not subject to *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 because Huhtamaki is not a major source of HAP.

   40 C.F.R. Part 63, Subpart JJJJJJ
   Boiler #5 is subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ and is considered an oil-fired boiler rated higher than 10 MMBtu/hr. However, because the boiler primarily fires natural gas and because gas-fired units are exempt from the subpart, Huhtamaki may elect to re-classify the boiler according to § 63.11225(g) and therefore exempt the Boiler #5 from the rule. [40 C.F.R. §§ 63.11193 and 63.11195]

   Potentially applicable requirements of 40 C.F.R. Part 63, Subpart JJJJJJ are addressed in Section II.I of the Findings of Fact, titled "Boilers #2, #3, and #5 NESHAP Requirements". Included, also, in that section is a discussion of current applicability.

3. Emission Controls and Compliance Assurance Monitoring (CAM)

   Boiler #5 was retrofitted with a low NO_x burner pursuant to *Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides,* 06-096 C.M.R. ch. 138. There are no monitoring requirements for this emissions control method.

   Emissions from Boiler #5 are also reduced through the operation of an O_2 trim system.

The low NO_x burner and the O_2 trim system are not considered a control devices via 40 C.F.R § 64.1, therefore CAM requirements are not applicable.

4. Emission Limits and Streamlining

For Boiler #5, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

<table>
<tr><th>Pollutant</th><th>Residual Fuel</th><th>Natural Gas</th><th colspan="2">Licensed Emission Limit(s)</th></tr>
<tr><td rowspan="4">PM</td><td colspan="2">0.20 lb/MMBtu
06-096 C.M.R. ch. 103 § 2.A.(1)</td><td colspan="2">Both Fuels</td></tr>
<tr><td>0.20 lb/MMBtu
A-416-70-C-A
(11/08/2004), BPT</td><td rowspan="2">0.47 lb/hr
A-416-77-1-A (
03/26//2012), BACT</td><td colspan="2" rowspan="2">0.20 lb/MMBtu *</td></tr>
<tr><td>12.96. lb/hr
A-416-70-C-A
(11/08/2004), BPT</td><td>#6 Fuel Oil</td><td>Nat. Gas</td></tr>
<tr><td>12.96 lb/hr</td><td>0.47 lb/hr</td></tr>
<tr><td rowspan="4">PM_{10}</td><td>0.20 lb/MMBtu
A-416-70-C-A (issued
11/08/2004), BPT</td><td rowspan="2">0.47 lb/hr
A-416-77-1-A
(03/26//2012), BACT</td><td colspan="2">#6 Fuel Oil</td></tr>
<tr><td>12.96 lb/hr
06-096 C.M.R. ch. 140, BPT
A-416-70-C-A
(11/08/2004), BPT</td><td colspan="2">0.20 lb/MMBtu</td></tr>
<tr><td>#6 Fuel Oil</td><td>Nat. Gas</td></tr>
<tr><td>12.96 lb/hr</td><td>0.47 lb/hr</td></tr>
<tr><td rowspan="2">SO_2</td><td rowspan="2">115.1 lb/hr
A-416-70-A-I
(01/15/2002), BPT</td><td rowspan="2">0.04 lb/hr
A-416-77-1-A
(03/26//2012), BACT</td><td>#6 Fuel Oil</td><td>Nat. Gas</td></tr>
<tr><td>115.1 lb/hr[2]</td><td>0.04 lb/hr</td></tr>
<tr><td rowspan="2">NO_x</td><td rowspan="2">0.40 lb/MMBtu
A-416-70-A-I (issued
01/15/2002), BPT</td><td rowspan="2">9.7 lb/hr
A-416-77-1-A (issued
03/26//2012), BACT</td><td>#6 Fuel Oil</td><td>Nat. Gas</td></tr>
<tr><td>0.40 lb/MMBtu</td><td>9.7 lb/hr</td></tr>
</table>

[2] Because Huhtamaki is permitted to fire residual fuel and specification waste oil purchased or generated prior to July 1, 2018 with sulfur contents above 0.5% and 0.7% by weight, respectively, the lb/hr limit will remain consistent with the previously licensed sulfur content of 1.7% by weight.

Pollutant	Residual Fuel	Natural Gas	Licensed Emission Limit(s)	
	26 lb/hr A-416-70-D-R(issued 10/09/2012), BPT[3]		**26 lb/hr**	
CO	2.2 lb/hr A-416-70-A-I (issued 01/15/2002), BPT	5.2 lb/hr A-416-77-1-A (issued 03/26//2012), BACT	**#6 Fuel Oil** **2.2 lb/hr**	**Nat. Gas** **5.2 lb/hr**
VOC	0.55 lb/hr A-416-70-A-I (issued 01/15/2002), BPT	0.34 lb/hr A-416-77-1-A (issued 03/26//2012), BACT	**#6 Fuel Oil** **0.55 lb/hr**	**Nat. Gas** **0.34 lb/hr**
Visible Emissions	30% opacity on a six-minute block average basis. 06-096 C.M.R. ch. 140, BPT	10 % opacity on a six-minute block average basis. 06-096 C.M.R. 140, BPT	**#6 Fuel Oil** **30% opacity on a six-minute block average basis. ***	
	30% opacity on a six-minute block average basis, except for no more than three six-minute block averages in a continuous 3-hour period. A-416-70-A-I (issued 01/15/2002), BPT	10% opacity on a six-minute block average basis, except for no more than one six-minute block average in a continuous 3-hour period. 06-096 C.M.R. ch. 101 § B.(1)(c) And A-416-77-1-A (issued 03/26//2012), BACT		
	30% opacity on a six-minute block average basis, except for no more than two six-minute block averages in a continuous 3-hour period. 06-096 C.M.R. ch. 101 § B.(1)(a)		**Nat Gas.** **10% opacity on a six-minute block average basis. ***	

Table Notes: ** streamlining requested*

[3] Limit first stablished in A-416-70-A-I, but calculation error corrected in A-416-70-D-R.

5. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boiler #5 shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department.

Pollutant	Unit of Standard	Compliance Method	Frequency
PM	lb/MMBtu; lb/hr	40 C.F.R. Part 60, App. A, Method 5	Dependent on #6 fuel oil use, as specified in Periodic Monitoring section
PM_{10}	lb/MMBtu; lb/hr	40 C.F.R. Part 60, App. A, Method 5 or EPA Test Method 201 or 201A	As requested
SO_2	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO_X	lb/MMBtu; lb/hr	40 C.F.R. Part 60, App. A, Method 7	Dependent on #6 fuel oil use, as specified in Periodic Monitoring section
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested
VOC	lb/hr	40 C.F.R. Part 60, App. A, Method 25 or 25A	As requested
Visible Emissions	% opacity	40 C.F.R. Part 60, App. A, Method 9	As requested

6. Periodic Monitoring

Huhtamaki shall monitor and record values for Boiler #5 as indicated in the following table:

Value	Units of Measure	Frequency	Origin and Authority
Combined fuel use	MMBtu	Monthly and 12-month rolling	A-416-70-F-A (05/15/2012), BPT
Natural gas use	MMBtu	Monthly and 12-month rolling	A-416-70-F-A (05/15/2012), BPT
Natural gas use	scf	Monthly and 12-month rolling	A-416-77-1-A (03/26/2012), BACT
Fuel oil use (#6 and waste oil)	Gallons	Monthly, and 12-month rolling total	A-416-70-A-I (01/15/2002), BPT

Value	Units of Measure	Frequency	Origin and Authority
Percent of total heat input from fuel oil	Percent by MMBtu	Monthly and 12-month rolling	06-096 C.M.R. ch. 140, BPT (in previous licensing for stack testing requirements: listed as #6 fuel oil, intent was total fuel oil)
#6 fuel oil use	MMBtu	Monthly and 12-month rolling	A-416-70-F-A (05/15/2012), BPT
#6 fuel oil sulfur content	Percent by weight	Each fuel purchase	A-416-70-A-I (01/15/2002), BPT
Waste oil use	MMBtu	Monthly and 12-month rolling total	A-416-70-F-A (05/15/2012), BPT
Waste oil sulfur content	Percent by weight	Once each calendar year	A-416-70-A-I (01/15/2002), BPT

PM and NO_x Emission Testing

Huhtamaki shall perform PM and NO_x emission testing on Boiler #5, firing #6 fuel oil, within 12 months of firing #6 fuel oil in Boiler #5 for greater than 50% of the boiler's annual total heat input on a 12-month rolling total basis.

7. Parameter Monitors

   There are no Parameter Monitors required for Boiler #5.

8. CEMS and COMS

   There are no CEMS or COMS required for Boiler #5

I. Boilers #2, #3, and #5 NESHAP Requirements

Boilers #2, #3, and #5 are all subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ. The boilers are all considered existing oil boilers rated higher than 10 MMBtu/hr. [40 C.F.R. §§63.11193 and 63.11195]

Each of the boilers primarily fires natural gas; however, Huhtamaki has chosen to maintain the boilers' oil-fired classifications. Gas-fired boilers are exempt from 40 C.F.R. Part 63, Subpart JJJJJJ. However, boilers which fire fuel oil are not. A "gas-fired boiler" is defined as any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel (48 hours total during any calendar year). Huhtamaki may elect to reclassify the boilers as gas fired as outlined in § 63.11225(g) and would therefore exempt the boilers from this rule. [40 C.F.R. § 63.11237]

A summary of the currently applicable federal 40 C.F.R. Part 63, Subpart JJJJJJ requirements is listed below. Notification forms and additional rule information can be found on the following website: https://www.epa.gov/stationary-sources-air-pollution/compliance-industrial-commercial-and-institutional-area-source.

1. Compliance Dates, Notifications, and Work Practice Requirements

   a. Initial Notification of Compliance

   An Initial Notification submittal to EPA was due no later than January 20, 2014. [40 C.F.R. § 63.11225(a)(2)]

   Huhtamaki submitted their Initial Notification to EPA on May 1, 2012.

   b. Boiler Tune-Up Program

   (1) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]

   (2) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. The boilers shall be tuned up according to the following table:

Boiler(s)	Boiler Category	Tune-Up Frequency
Boilers #2, #3, and #5	Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up. In order to qualify for this reduced frequency, the oxygen level must be set to no lower than the oxygen concentration measured during the most recent tune-up.	Every 5 years
Boilers if oxygen levels are set lower than what is measured during most recent tune-up	New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with Less Frequent Tune-up Requirements"	Every 2 years

[40 C.F.R. § 63.11223(a) and (c) and Table 2]

(3) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

(a) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the

previous inspection except for when Boilers #2 , #3, and/or #5 qualify for 5 year tune-ups, in which case delay of the burner inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]

(b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]

(c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection except for when Boilers #2, #3, and/or #5 qualify for 5 year tune-ups frequencies, in which case delay of the burner inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]

(d) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]

(e) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]

(f) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up.
[40 C.F.R. § 63.11223(b)(7)]

(4) Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:

(a) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;

(b) A description of any corrective actions taken as part of the tune-up of the boiler; and

(c) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

(5) After conducting the initial boiler tune-up, a Notification of Compliance Status was required to be submitted to EPA, no later than July 19, 2014. [40 C.F.R. § 63.11225(a)(4) and 40 C.F.R. § 63.11214(b)]

Huhtamaki submitted their Notification of Compliance Status to EPA on June 25, 2014.

c. Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years (or every five years for Boilers #2 and #3 when qualifying for 5 year tune-ups). The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

(1) Company name and address;
(2) A statement of whether the source has complied with all the relevant requirements of this Subpart;
(3) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
(4) The following certifications, as applicable:
  (a) "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
  (b) "No secondary materials that are solid waste were combusted in any affected unit."
  (c) "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

d. Energy Assessment

Boilers #2, #3, and #5 are subject to the energy assessment requirement as follows:

(1) A one-time energy assessment was required to be performed by a qualified energy assessor on the applicable boilers no later than March 21, 2014. [40 C.F.R. § 63.11196(a)(3)]

Huhtamaki conducted their one-time energy assessment on March 14, 2014.

2. Recordkeeping

Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJJ including the following [40 C.F.R. § 63.11225(c)]:

a. Copies of notifications and reports with supporting compliance documentation;
b. Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;

c. Records of the occurrence and duration of each malfunction of each applicable boiler; and
d. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review.

J. Boilers #2, #3, and #5 Fuel Use Limits

1. Natural Gas use in Boilers #2 and #3 shall not exceed 553.6 MMscf/year. [A-416-77-2-A (09/20/2012), BACT]

2. Natural Gas use in Boiler #5 shall not exceed 503.3 MMscf/year. [A-416-77-3-M (06/11/2013), BPT]

3. Cumulative #6 fuel oil and specification waste oil use in Boilers #2, #3, and #5 shall not exceed 3,500,000 gallons per year, on a 12-month rolling total basis. [A-416-70-D-R (10/09/2012), BPT]

4. Cumulative #6 fuel oil and specification waste oil use in Boiler #5 shall not exceed 3,110,400 gallons per year, on a 12-month rolling total basis. [A-416-70-C-A (11/08/2004), BPT]

K. Fire Pump

Huhtamaki operates one fire pump. The Fire Pump has an engine rated at 1.22 MMBtu/hr which fires distillate fuel, and it was installed in 1966.

1. Operation Restrictions (NO_s RACT)

The Fire Pump is licensed to operate for 500 hours per year in total and 100 hours per year for non-emergency purposes, as allowed by 40 C.F.R. Part 63, Subpart ZZZZ. By limiting the unit to 500 hours per year of total operation, it is not subject to NO_x RACT requirements.

2. New Source Performance Standards (NSPS)

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 C.F.R. Part 60, Subpart IIII is not applicable to the Fire Pump since the unit was ordered before July 11, 2005, and manufactured before April 1, 2006.

3. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 C.F.R. Part 63, Subpart ZZZZ is applicable to the Fire Pump. The unit is considered an existing, emergency stationary reciprocating internal combustion engine (RICE) at an area HAP source and is not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE*) specifically does not exempt these units from the federal requirements.

a. Emergency Engine Designation and Operating Criteria

Under Subpart ZZZZ, a stationary reciprocating internal combustion engine (RICE) is considered an **emergency** stationary RICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under Subpart ZZZZ, resulting in the engine being subject to requirements applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster or equipment failure;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

(i) An emergency engine may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance

company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE more than 100 hours per calendar year.

(ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The Fire Pump shall be limited to the usage outlined in 40 C.F.R. § 63.6640(f) and therefore may be classified as an existing emergency stationary RICE as defined in 40 C.F.R. Part 63, Subpart ZZZZ. Failure to comply with all of the requirements listed in 40 C.F.R. § 63.6640(f) may cause this engine to not be considered an emergency engine and therefore subject to all applicable requirements for non-emergency engines.

b. 40 CFR Part 63, Subpart ZZZZ Requirements

(1) Operation and Maintenance Requirements
Huhtamaki shall comply with the following operation and maintenance requirements for the Fire Pump:

- Change oil and filter every 500 hours of operation or annually, whichever comes first;
- Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The Fire Pump shall be operated and maintained according to the manufacturer's emission-related written instructions, or Huhtamaki shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

(2) Optional Oil Analysis Program
Huhtamaki has the option of utilizing an oil analysis program which complies with the requirements of § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, Huhtamaki must keep records of the parameters that are analyzed as part of the program, the results of the analysis,

and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 C.F.R. § 63.6625(i)]

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on the Fire Pump. [40 C.F.R. § 63.6625(f)]

(4) Startup Idle and Startup Time Minimization Requirements
During periods of startup the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) and 40 CFR Part 63, Subpart ZZZZ Table 2d]

(5) Annual Time Limit for Maintenance and Testing
As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations. [40 CFR § 63.6640(f)]

(6) Recordkeeping
Huhtamaki shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 CFR §63.6655(f)]

4. Opacity Standards and Streamlining

The following table lists all applicable opacity standards for the Fire Pump, the origin and authority of the standards, and the streamlined licensed standard:

Pollutant	Applicable Standards	Licensed Standard
Visible Emissions	30% opacity on a six-minute block average basis. 06-096 C.M.R. ch. 140, BPT	Visible Emissions from the Fire Pump shall not exceed 30% opacity on a six-minute block average basis. *
	30% opacity on a six-minute block average basis in a three-hour period, except for no more than two six-minute block averages in a three-hour period. 06-096 C.M.R. ch. 101(2)(B)(f)	
	30% opacity on a six-minute block average basis in a three-hour period, except for no more than two six-minute block averages in a three-hour period. A A-416-70-D-R (10/09/2002), BPT	

Table Notes: ** streamlining requested*

5. Emission Limit Compliance Methods

Compliance with the opacity standard associated with the Fire Pump shall be demonstrated in accordance with 40 C.F.R. Part 60, App. A, Method 9, or another method as approved by the Department.

6. Compliance Assurance Monitoring

CAM is not applicable to the Fire Pump as it does not utilize control equipment to minimize emissions.

7. Periodic Monitoring

Huhtamaki shall demonstrate compliance with the fuel sulfur content requirement shall by fuel delivery receipts from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [A-416-70-A-I (01/15/2002), BPT]

8. Parameter Monitors

   There are no Parameter Monitors required for the Fire Pump.

9. CEMS and COMS

   There are no CEMS or COMS required for the Fire Pump.

L. Portable Engines

Huhtamaki may operate portable engines on-site for maintenance and emergency-only purposes. Depending on their size and age, these engines may be subject to *Visible Emissions Regulation*, 06-096 C.M.R. ch. 101 and *Fuel Burning Equipment Particulate Emission Standard*, 06-096 C.M.R. ch. 103.

Any engine which cannot meet the definition of "portable engine" as defined by this license may be subject to additional State and Federal regulations. A license amendment may be necessary for a portable engine to be reclassified as stationary.

M. Process Equipment

Huhtamaki operates the following additional equipment within the manufacturing process:

- Rough Dryers
- Smooth Dryers
- Laminators
- Hydropulper
- Bead Blaster

The operation of these units results in the emission of particulate matter, VOC, and HAP. Huhtamaki shall meet the following requirements for the licensed process equipment:

Particulate Matter Emissions (Evaluated in the Basis of Visible Emissions)

The following table lists all applicable visible emissions standards for the process equipment, the origin and authority of the standards, and the streamlined licensed standard:

Pollutant	Applicable Standards	Licensed Standard
Visible Emissions	10% opacity on a six-minute block average basis for each of the following: Rough Molded Dryers, Smooth Molded Dryers, Bead Blaster, Hydropulper, and Lamination Process Compliance shall be determined in accordance with EPA Test Method 9, contained in 40 C.F.R. Part 60, Appendix A or another method as approved by the Department. A-416-70-D-R (10/09/2012), BPT	Visible Emissions from process equipment at Huhtamaki shall not exceed 10% opacity on a six-minute block average basis for each of the following: Rough Molded Dryers, Smooth Molded Dryers, Bead Blaster, Hydropulper, and Lamination Process Compliance shall be determined in accordance with EPA Test Method 9, contained in 40 C.F.R. Part 60, Appendix A or another method as approved by the Department. *
	20% opacity on a six-minute block average basis in a three-hour period, except for no more than one six-minute block average in a one-hour period. 06-096 C.M.R. ch. 101(2)(B)(3)(d)	
	10% opacity on a six-minute block average basis from Process Dryers #8-15 and the Bead Blaster A-416-70-A-I (01/15/2002), BPT	

Table Notes: * streamlining requested

VOC and HAP Emissions

Potential emissions estimates for VOC and HAP were provided by Huhtamaki in the application dated 03/17/2017 for each process unit. Based on the provided emissions estimates, the annual fuel use limits, and the annual production capabilities of the facility, Huhtamaki shall be limited to the following for all facility operations:

- 24.9 tons per year of VOC
- 24.9 tons per year of total HAP
- 9.9 tons per year of any single HAP

Based on the results of stack testing completed between 1992 and 1993, when operating the facility in accordance with the annual fuel limits on the boilers, Huhtamaki does not

have the potential to exceed the VOC and HAP limits. Huhtamaki shall therefore maintain the records required for the boilers to document compliance with the above limits.

Upon request, Huhtamaki shall provide to the Department records of the quantities of materials used in the process units (as applicable) on a 12-month rolling total basis. When requested by the Department, Huhtamaki shall also conduct stack testing on applicable process vents to determine compliance with the tons per year limits.
[06-096 C.M.R. ch. 140, BPT]

Additional Periodic Monitoring
Huhtamaki shall maintain production records and records of all process and process equipment malfunctions that could potentially increase air emissions.
[A-416-70-D-R (10/09/2012), BPT]

N. Storage Tanks

1. LNG Storage Tanks
   The LNG storage tanks listed in A-416-70-D-R (10/09/2012) have been removed from the facility. Since the issuance of that license, natural gas became available via pipeline to the facility and Huhtamaki no longer needed to maintain the storage tanks. Because the tanks were considered to be insignificant, no additional licensing action is necessary.

2. #6 Fuel Oil Storage Tanks
   Huhtamaki has two #6 fuel oil storage tanks on site. Both tanks were installed in 2002 and each of them can store 40,000 gallons. Because of the sizes of the tanks, they are not subject to any state or federal regulation and will not be addressed further in this license.

3. Sodium Hypochlorite Tank
Huhtamaki uses a 5,452 gallon tank to store sodium hypochlorite at the facility. Aerosol emission from the tank are controlled by a demister pad (previously identified as a scrubber) on the vent stack with a design capture and PM control efficiency of over 99%.

The following requirements are applicable for the sodium hypochlorite tank:

Emission Standards and Streamlining

Pollutant	Applicable Standards	Licensed Standard
Visible Emissions	Shall not exceed 20% opacity on a six-minute block average basis in a three-hour period. 06-096 C.M.R. ch. 140, BPT	Visible Emissions from the Sodium Hypochlorite Tank shall not exceed 20% opacity on a six-minute block average basis in a three-hour period. Compliance shall be determined in accordance with EPA Test Method 9, contained in 40 C.F.R. Part 60, Appendix A, or other method as approved by the Department. *
	Shall not exceed 20% opacity on a six-minute block average basis in a three-hour period, except for no more than one six-minute block averages in a three-hour period. Compliance shall be determined in accordance with EPA Test Method 9, contained in 40 C.F.R. Part 60, Appendix A, or other method as approved by the Department. 06-096 C.M.R. ch. 101(2)(B)(3)(d) and A-416-70-D-R (10/09/2012), BPT	
	Shall not exceed 20% opacity on a six-minute block average basis in a three-hour period, except for no more than one six-minute block averages in a three-hour period. 06-096 C.M.R. ch. 101(2)(B)(3)(d)	

*Table Notes: * streamlining requested*

Control Equipment
Huhtamaki shall operate and maintain a demister system on the Sodium Hypochlorite Tank vent stack to control emissions.

Periodic Monitoring

a. Sodium hypochlorite throughput
Huhtamaki shall monitor and record the tank's annual sodium hypochlorite throughput, in gallons, on a monthly 12-month rolling total basis.

b. Control equipment
Huhtamaki shall document and maintain records detailing all control equipment malfunctions and all maintenance activities related to the demister pad. The documentation shall include the date and nature of all demister pad failures.

O. Steam Turbine Generator

Huhtamaki installed a steam turbine in 2005 to generate electricity while controlling steam pressure levels to process equipment at the facility.

Huhtamaki uses two different steam pressures in its heating and drying processes, 450 psig and 125 psig. The majority of plant steam, for both high and low pressure needs, is generated by one boiler operating at the high pressure level of 450 psig. Instead of passing the higher pressure steam through a regulating valve to yield the lower steam pressure of 125 psig, Huhtamaki uses the turbine generator to generate electricity while reducing the pressure.

The turbine steam flow and resulting electric output is controlled by the steam pressure needs within the mill (125 psig vs 450 psig), and the turbine generator can only be operated in this way. As a result, no additional steam is needed from any of the boilers to operate the steam turbine generator and the boilers cannot be operated just to feed the turbine. This unit only acts to increase the energy efficiency of the facility and no additional air emissions are produced with its utilization. Based on these findings, the Department has determined that the installation and operation of the steam turbine generator does not constitute a modification and its inclusion in this license is for informational purposes only.

P. Parts Washers

Huhtamaki utilizes three parts washers at the facility. The two parts washers licensed in A-416-70-D-R (10/09/2012) have been removed and have been replaced with three new ones. All three parts washers use solvents that are equal to or below 5% VOC by weight and are therefore exempt from 06-096 C.M.R. ch. 130.

Q. Facility Annual Emissions

1. Total Annual Emissions

Huhtamaki is licensed for the emissions in the table below on a 12-month rolling total basis. For the purpose of calculating the combined tons per year, the following factors are considered:

- Boiler #5's use of #6 fuel oil is limited to 3,110,400 gallons/year, with fuel sulfur content not to exceed 1.7% by weight (as previously licensed).
- The facility-wide #6 fuel oil use is limited to 3.5 million gallons per year, with fuel sulfur content not to exceed 1.7% by weight (as previously licensed).
- Boiler #5's use of natural gas is limited to 503.2 MMscf/year (using the corrected conversion factor).
- The natural gas use in Boilers #2 and #3 combined is limited to 553.6 MMscf/year (as previously licensed).
- The VOC and HAP limits that have been provided for all process operations:
  - 24.9 tons per year of VOC
  - 24.9 tons per year of total HAP
  - 9.9 tons per year of any single HAP

Based on the lb/hour emission limits for Huhtamaki's emission units, emissions factors used for each fuel type in each boiler, and operating limitations, the operating scenario for the facility which results in the highest emission levels is the following:

a. Boilers #2 and #3 fire #6 fuel oil continuously at their maximum rated capacities for 8760 hours/year (equal to 3,421,656 gallons);

b. Boiler #5 fires the oil remaining under the facility fuel use cap (equal to 78,344 gallons), since Boiler #2 and #3 are not physically capable of firing 3.5 million gallons of #6 fuel oil; and

c. Boiler #5 then fires natural gas up to its natural gas fuel use cap of 503.2 MMscf (after the annual fuel oil quantity is expended).

The resulting, facility-wide, worst-case annual emissions for the facility are presented in the table below and shall be the basis for calculation of the facility's annual licensing fee.

Total Annual Emissions for the Facility
(Tons/Year)

Units	PM	PM_{10}	SO_2	NO_x	CO	VOC
Boilers #2, #3, and #5, combined	41.6	41.6	466.1	157.6	30.2	24.9

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans,* 40 C.F.R. Part 52, Subpart A, § 52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 C.M.R. ch. 100, are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO_2e).

The quantity of CO_2e emissions from this facility is less than 100,000 tons per year, based on the following:

- the facility's fuel use limits;
- worst case emission factors from the following sources: U.S. EPA's AP-42, the Intergovernmental Panel on Climate Change (IPCC), and *Mandatory Greenhouse Gas Reporting,* 40 C.F.R. Part 98; and
- global warming potentials contained in 40 C.F.R. Part 98.

III. AMBIENT AIR QUALITY ANALYSIS

Huhtamaki 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 (see license A-416-70-A-I, issued on 01/15/2002). An additional ambient air quality analysis is not required for this Part 70 License.

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 A-416-70-I-R pursuant to 06-096 C.M.R. ch. 140 and the preconstruction permitting requirements of 06-096 C.M.R. ch. 115 and subject to the standard and specific conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Huhtamaki pursuant to the Department's preconstruction permitting requirements have been incorporated into this Part 70 license, except for such conditions that the Department has

determined are obsolete, extraneous, or otherwise environmentally insignificant, as explained in the Findings of Fact accompanying this Order. As such, the conditions in this license supersede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in *Major and Minor Source Air Emission License Regulations*, 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 standard and 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.

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 C.M.R. ch. 140]

(2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [06-096 C.M.R. ch. 140]

(3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 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 affect 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 03/17/2017.

Permit Shield Table

Source	Citation	Description	Basis for Determination
Facility	06-096 C.M.R. ch. 132	Graphic Arts- Rotogravure and Flexography	Huhtamaki does not operate rotogravure printing presses and is below the HAP emission threshold for flexography.
Facility	40 C.F.R. Part 63, Subpart KK	National Emission Standard for the Printing and Publishing Industry	
Facility	06-096 C.M.R. ch. 134	VOC RACT	Paper machines are exempt from VOC RACT (Section 1.C.7); PTE from other areas is < 40 TPY
Facility	40 C.F.R. Part 63, Subpart S	National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry	Facility is not a major source of HAP and does not use chlorinated compounds to bleach pulp
Fire Pump	06-096 C.M.R. ch. 138	NO_x RACT	The Fire Pump does not have the potential to emit 10 TPY of NO_x

Source	Citation	Description	Basis for Determination
Boilers	40 C.F.R. Part 60, Subpart Dc	Standards of Performance of Small Industrial-Commercial-Institutional Steam Generating Units	Boilers were constructed prior to applicability date of 06-09/1989

[06-096 C.M.R. ch. 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 three 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 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, conducting inspections, or examining and copying records relating to emissions and this license (38 M.R.S. § 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 C.M.R. ch. 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 C.M.R. ch. 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. § 353-A.

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

(8) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. 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 C.F.R. 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 C.M.R. ch. 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 C.F.R. 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 140]

(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 C.M.R. ch. 140]

SPECIFIC CONDITIONS

(14) Facility Fuel Use

A. Fuel Specifications

1. Specification Waste Oil Requirements

Huhtamaki is licensed to fire specification waste oil mixed with #6 fuel oil in Boilers #2, #3, and #5. The facility shall meet the following requirements for specification waste oil:

a. All waste oil fired in the boilers shall meet the criterial of "specification waste oil" as defined in *Waste Oil Management Rules,* 06-096 C.M.R. ch. 860 (as stated in the Definitions section of this license). [A-416-70-A-I (01/15/2002), BPT]
b. Huhtamaki shall maintain testing records of a representative sample of the waste oil utilized, demonstrating that the waste oil meets the definition found in 06-096 C.M.R. ch. 860. [A-416-70-A-I (01/15/2002), BPT]
c. Huhtamaki shall submit a representative waste oil analysis to the Department upon request. [A-416-70-A-I (01/15/2002), BPT]

2. Fuel Sulfur Content

Distillate Fuel (Fire Pump)
Huhtamaki shall only fire distillate fuel with a sulfur content of 0.0015% or less by weight. [A-416-70-D-R (10/09/2012), BPT; 38 M.R.S. § 603-A(2)(A)(3)]

#6 Fuel Oil and Specification Waste Oil (Boilers)

a. #6 fuel oil or any mixture of #6 fuel oil with specification waste oil fired in the boilers acquired prior to July 1, 2018, shall have a sulfur content that does not exceed 1.7% by weight.

b. #6 fuel oil purchased or otherwise obtained for use at the facility shall not exceed 0.5% by weight.

c. Specification waste oil purchased or otherwise obtained for use at the facility shall not exceed 0.7% by weight.

[A-416-70-A-I (01/15/2002), BPT; 38 M.R.S. § 603-A(2)(A)(1) and (2); 06-096 C.M.R. ch. 140, BPT]

3. Fuel Limits

a. Natural gas use in Boilers #2 and #3 shall not exceed 553.6 MMscf/year. [A-416-77-2-A (09/20/2012), BACT]

b. Natural gas use in Boiler #5 shall not exceed 503.2 MMscf/year. [A-416-77-3-M (06/11/2013), BPT]

c. Total cumulative #6 fuel oil and specification waste oil use in Boilers #2, #3, and #5 shall not exceed 3,500,000 gallons per year, on a 12-month rolling total basis. [A-416-70-D-R (10/09/2012), BPT]

d. Cumulative #6 fuel oil and specification waste oil use in Boiler #5 shall not exceed 3,110,400 gallons per year. [A-416-70-C-A (11/08/2004), BPT]

(15) **Boilers #2 and #3**

A. Operating Restrictions

1. Boilers #2 and #3 are licensed to fire natural gas, #6 fuel oil, and specification waste oil. [A-416-70-A-I (01/15/2002), BPT and 06-0096 C.M.R. ch. 140, BPT]

2. Huhtamaki is licensed to operate each boiler at a maximum design heat input capacity of 29.3 MMBtu/hr firing fuel oil and 32.6 MMBtu/hr firing natural gas [A-416-70-G-A (09/23/2013), BPT]

B. Boilers #2 and #3 Emission Limits

1. Emissions from Boilers #2 and #3 shall not exceed the following limits:

– Each Boiler – All Fuels			
Pollutant	**lb/MMBtu**	**Origin and Authority**	**Enforceability**
PM	0.15	06-096 C.M.R. ch. 140, BPT	-
PM_{10}	0.15	A-416-70-A-I (01/15/2002), BPT	Enforceable by State-only

– Combined Emissions – Natural Gas			
Pollutant	**lb/hr**	**Origin and Authority**	**Enforceability**
PM	0.48	A-416-77-2-A (09/20/2012), BACT	-
PM_{10}	0.48	A-416-77-2-A (09/20/2012), BACT	-
SO_2	0.04	A-416-77-2-A (09/20/2012), BACT	-
NO_X	10.08	A-416-77-2-A (09/20/2012), BACT	-
CO	5.38	A-416-77-2-A (09/20/2012), BACT	-
VOC	0.35	A-416-77-2-A (09/20/2012), BACT	-

– Each Boiler – #6 Fuel Oil / Specification Waste Oil			
Pollutant	**lb/hr**	**Origin and Authority**	**Enforceability**
PM	4.4	A-416-70-A-I (01/15/2002), BPT	Enforceable by State-only
PM_{10}	4.4	A-416-70-A-I (01/15/2002), BPT	
SO_2	52	A-416-70-A-I (01/15/2002), BPT	
NO_X	13.2	A-416-70-A-I (01/15/2002), BPT	
CO	1.0	A-416-70-A-I (01/15/2002), BPT	
VOC	0.25	A-416-70-A-I (01/15/2002), BPT	

2. Visible Emissions from Stack #1 shall not exceed 30% opacity on a 6-minute block average basis when either boiler is firing #6 fuel oil or when both are operating. [06-096 C.M.R. ch. 140, BPT]

3. Visible Emissions from Stack #1 shall not exceed 10% opacity on a 6-minute block average basis when only one boiler is operating and is firing Natural gas [06-096 C.M.R. ch. 140, BPT]

C. Compliance Methods

Compliance with the emission limits listed above shall be demonstrated in accordance with the following methods and frequencies, or other methods and frequencies as approved by the Department [06-096 C.M.R. ch. 140, BPT]:

Pollutant	**Unit of Standard**	**Compliance Method**	**Frequency**
PM	lb/MMBtu; lb/hr	40 CFR Part 60, App. A, Method 5	As requested
PM_{10}		40 CFR Part 60, App. A, Method 5 or EPA Test Method 201 or 201A	
SO_2	lb/hr	40 CFR Part 60, App. A, Method 6 or 6C	

Pollutant	Unit of Standard	Compliance Method	Frequency
NO_X		40 CFR Part 60, App. A, Method 7 or 7E	As requested
CO		40 CFR Part 60, App. A, Method 10	
VOC		40 CFR Part 60, App. A, Method 25 or 25A	
Visible Emissions	% opacity	40 C.F.R. Part 60, App. A, Method 9	As requested

D. Automated Boiler Controls (O_2 Trim)

As a substitute for the required annual tune-up on each boiler in *Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides (NO_x RACT)*, 06-096 C.M.R. ch. 138 § 3(L)(1) and (2), Huhtamaki shall utilize automated boiler combustion controls on Boilers #2 and #3. Huhtamaki shall use this system to optimize operation of these boilers on a continuous basis and thereby minimize emissions of air pollutants. [06-096 C.M.R. ch. 138 § 3(L)(1) and (2), and 06-096 C.M.R. ch. 140, BPT]

E. Periodic Monitoring

Huhtamaki shall monitor and record the values for Boilers #2 and #3 indicated in the following table. [06-096 C.M.R. ch. 140, BPT]

Values	Units of Measure	Frequency	Origin and Enforceability
#6 fuel oil use	Gallons	Monthly and 12 month rolling total	A-416-70-A-I (01/15/2002), BPT
#6 fuel oil sulfur content	Percent, by weight	Each fuel purchase	A-416-70-A-I (01/15/2002), BPT
Specification waste oil use	Gallons	Monthly and 12-month rolling total	A-416-70-A-I (01/15/2002), BPT
Specification waste oil sulfur content	Percent, by weight	Once per calendar year	A-416-70-A-I (01/15/2002), BPT

(16) **Boiler #5**

A. Operating Restrictions

1. Boiler #5 is licensed to fire natural gas, #6 fuel oil, and specification waste oil. [A-416-70-A-I (01/15/2002), BPT]

2. Huhtamaki is licensed to operate Boiler #5 at a maximum design heat input capacity of 64.8 MMBtu/hr firing fuel oil and 71.3 MMBtu/hr firing natural gas. [A-416-70-G-A (09/23/2013), BPT]

B. Boiler #5 Emission Limits

1. Emissions from Boiler #5 shall not exceed the following limits:

All Fuels			
Pollutant	**lb/MMBtu**	**Origin and Authority**	**Enforceability**
PM	0.20	A-416-70-C-A (11/08/2004), BPT	-
PM_{10}	0.20	A-416-70-C-A (11/08/2004), BPT	Enforceable by State-only

#6 Fuel Oil / Specification Waste Oil			
Pollutant	**lb/MMBtu**	**Origin and Authority**	**Enforceability**
NO_x	0.40	A-416-70-A-I (01/15/2005), BPT	Enforceable by State-only

Natural Gas			
Pollutant	**lb/hr**	**Origin and Authority**	**Enforceability**
PM	0.47	A-416-77-1-A (03/26/2012), BACT	-
PM_{10}	0.47	A-416-77-1-A (03/26/2012), BACT	-
SO_2	0.04	A-416-77-1-A (03/26/2012), BACT	-
NO_X	9.7	A-416-77-1-A (03/26/2012), BACT	-
CO	5.2	A-416-77-1-A (03/26/2012), BACT	-
VOC	0.34	A-416-77-1-A (03/26/2012), BACT	-

#6 Fuel Oil / Specification Waste Oil			
Pollutant	**lb/hr**	**Origin and Authority**	**Enforceability**
PM	12.96	A-416-70-C-A (11/08/2004), BPT	Enforceable by State-only
PM_{10}	12.96	A-416-70-C-A (11/08/2004), BPT	
SO_2	115.1	A-416-70-A-I (01/15/2002), BPT	
NO_X	26.0	A-416-70-D-R (10/09/2012), BPT[4]	
CO	2.2	A-416-70-A-I (01/15/2002), BPT	
VOC	0.55	A-416-70-A-I (01/15/2002), BPT	

[4] A-416-70-A-I calculation error corrected in A-416-70-D-R

2. Visible Emissions

   a. Visible emissions from Boiler #5 shall not exceed 30% opacity on a six-minute block average basis when firing fuel oil. [06-096 C.M.R. ch. 140, BPT]

   b. Visible emissions from Boiler #5 shall not exceed 10% opacity on a six-minute block average basis when firing natural gas. [06-096 C.M.R. ch. 140, BPT]

C. Control Equipment

Huhtamaki shall operate and maintain low NO_x burner technology to meet the NO_x emission limits for this unit. [A-416-72-B-A (01/19/1996), RACT]

D. Compliance Methods

Compliance with the emission limits listed above shall be demonstrated in accordance with the following methods and frequencies, or other methods and frequencies as approved by the Department [06-096 C.M.R. ch. 140, BPT]:

Pollutant	Unit of Standard	Compliance Method	Frequency
PM	lb/MMBtu; lb/hr	40 C.F.R. Part 60, App. A, Method 5	Dependent on #6 fuel oil use, as specified in Periodic Monitoring section
PM_{10}	lb/MMBtu; lb/hr	40 C.F.R. Part 60, App. A, Method 5 or EPA Test Method 201 or 201A	As requested
SO_2	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO_x	lb/MMBtu; lb/hr	40 C.F.R. Part 60, App. A, Method 7	Dependent on #6 fuel oil use, as specified in Periodic Monitoring section
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested
VOC	lb/hr	40 C.F.R. Part 60, App. A, Method 25 or 25A	As requested
Visible Emissions	% opacity	40 C.F.R. Part 60, App. A, Method 9	As requested

E. Periodic Monitoring

1. Huhtamaki shall monitor and record values for Boiler #5 as indicated in the following table: [06-096 C.M.R. ch. 140, BPT]

Values	Units of Measure	Frequency	Origin and Authority
Combined fuel use	MMBtu	Monthly and 12-month rolling	A-416-70-F-A (05/15/2012), BPT
Natural gas use	MMBtu	Monthly and 12-month rolling	A-416-70-F-A (05/15/2012), BPT
Natural gas use	scf	Monthly and 12-month rolling	A-416-77-1-A (03/26/2012), BACT
fuel oil use (#6 and waste oil)	Gallons	Monthly, and 12-month rolling total	A-416-70-A-I (01/15/2002), BPT
Percent of total heat input from fuel oil	Percent by MMBtu	Monthly and 12-month rolling	06-096 C.M.R. ch. 140, BPT (in previous licensing for stack testing requirements: listed as #6 fuel oil, intent was total fuel oil)
#6 fuel oil use	MMBtu	Monthly and 12-month rolling	A-416-70-F-A (05/15/2012), BPT
#6 fuel oil sulfur content	Percent by weight	Each fuel purchase	A-416-70-A-I (01/15/2002), BPT
Waste oil use	MMBtu	Monthly and 12-month rolling total	A-416-70-F-A (05/15/2012), BPT
Waste oil sulfur content	Percent by weight	Once each calendar year	A-416-70-A-I (01/15/2002), BPT

2. PM and NO_x Emission Testing

Huhtamaki shall perform PM and NO_x emission testing on Boiler #5, firing #6 fuel oil, within 12 months of firing fuel oil in Boiler #5 for greater than 50% of the boiler's annual total heat input on a 12-month rolling total basis. [A-416-70-F-A (05/15/2012), BPT]

(17) **Boilers #2, #3, and #5 NESHAP Requirements**

Huhtamaki shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJJ applicable to each boiler including, but not limited to, the following for as long as the boilers are classified as oil-fired and are subject to the rule:
[40 C.F.R. §§ 63.11193 and 63.11195]

A. Compliance Dates, Notifications, and Work Practice Standards

1. Boiler Tune-Up Program

a. A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]

b. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. The boilers shall be tuned up according to the following table:

Boiler(s)	Boiler Category	Tune-Up Frequency
Boilers #2, #3, and #5	Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up. In order to qualify for this reduced frequency, the oxygen level must be set to no lower than the oxygen concentration measured during the most recent tune-up.	Every 5 years
Boilers if oxygen levels are set lower than what is measured during most recent tune-up	New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with Less Frequent Tune-up Requirements"	Every 2 years

[40 C.F.R. § 63.11223(a) and (c) and Table 2]

c. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

(1) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection except for when Boilers #2 and #3 qualify for 5 year tune-ups, in which case delay of the burner inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]

(2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]

(3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection except for when Boilers #2 and #3 qualify for 5 year tune-ups frequencies, in which case delay of the burner inspection

until the next scheduled shutdown is permitted for up to 72 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]

(4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]

(5) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]

(6) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up.
[40 C.F.R. § 63.11223(b)(7)]

d. Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:

(1) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;

(2) A description of any corrective actions taken as part of the tune-up of the boiler; and

(3) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

2. Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years (or every five years for Boilers #2 and #3 when qualifying for 5 year tune-ups). The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

a. Company name and address;

b. A statement of whether the source has complied with all the relevant requirements of this Subpart;

c. A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;

d. The following certifications, as applicable:

(1) "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."

(2) "No secondary materials that are solid waste were combusted in any affected unit."
(3) "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

B. Recordkeeping

Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJJ including the following [40 C.F.R. § 63.11225(c)]:

1. Copies of notifications and reports with supporting compliance documentation;
2. Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
3. Records of the occurrence and duration of each malfunction of each applicable boiler; and
4. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review.

(18) **Fire Pump**

A. Allowable Operation and Fuels

1. Huhtamaki's Fire Pump is licensed to fire distillate fuel. [A-416-70-A-I (01/15/2002), BPT]
2. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [A-416-70-A-I (01/15/2002), BPT]
3. The Fire Pump shall be limited to 500 hours of total operation and 100 hours of operation for non-emergency purposes per calendar year. [A-416-71-D-R (10/09/2012), BPT] **Enforceable by State-only**

B. Visible Emissions from the Fire Pump shall not exceed 30% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 140, BPT]

C. The Fire Pump shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following:

1. Operational Limitations

   a. Huhtamaki shall change the oil and filter every 500 hours of operation or annually, whichever comes first;
   b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
   c. Inspect the hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

   Records shall be maintained documenting compliance with the operational limitations.
   [40 C.F.R. § 63.6603(a) and Table 2(d); and 06-096 C.M.R. ch. 140, BPT]

2. Oil Analysis Program Option
   Huhtamaki has the option of utilizing an oil analysis program which complies with the requirements of § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, Huhtamaki must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 C.F.R. § 63.6625(i)]

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 63.6625(f)]

4. Maintenance, Testing, and Non-Emergency Operating Situations

   a. The engine shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations. These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written logs) of all engine operating hours. [40 C.F.R. § 63.6640(f) and 06-096 C.M.R. ch. 140, BPT]

   b. Huhtamaki shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. §§ 63.6655(e) and (f) and A-416-70-D-R (10/09/2012), BPT]

5. Operation and Maintenance
   The engine shall be operated and maintained according to the manufacturer's emission-related written instructions, or Huhtamaki shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

6. Startup Idle and Startup Time Minimization
   During periods of startup the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) & 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(19) **Process Equipment**

Huhtamaki shall comply with the requirements below for the following equipment:

- Rough Dryers
- Smooth Dryers
- Laminators
- Hydropulper
- Bead Blaster

A. Visible Emissions

Visible Emissions from the Rough Dryers, Smooth Dyers, Laminators, Hydropulper, and Bead Blaster at Huhtamaki shall not each exceed 10% opacity on a six-minute block average basis.

Compliance shall be determined in accordance with EPA Test Method 9, contained in 40 C.F.R. Part 60, Appendix A or another method as approved by the Department.

[A-416-70-D-R (10/09/2012), BPT]

B. VOC and HAP Emissions

1. Huhtamaki shall operate the process equipment so that all facility operations are limited to the following:

   - 24.9 Tons per year of VOC
   - 24.9 Tons per year of total HAP
   - 9.9 Tons per year of any single HAP

2. When operating the facility in accordance with the annual fuel limits on the boilers, Huhtamaki does not have the potential to exceed the VOC and HAP limits. Huhtamaki shall therefore maintain the records required for the boilers to document compliance with the above limits.

3. Upon request, Huhtamaki shall provide to the Department records of the materials used in the process units on an annual basis.

4. Upon request, Huhtamaki shall conduct stack testing on applicable process vents to demonstrate compliance with the VOC and HAP tons per year limits:

[06-096 C.M.R. ch. 140, BPT]

C. Additional Periodic Monitoring

Huhtamaki shall maintain production records and records of all process and process equipment malfunctions that could potentially increase air emissions.
[A-416-70-D-R (10/09/2012), BPT]

(20) **Sodium Hypochlorite Tank**

A. Visible Emissions

Visible Emissions from the Sodium Hypochlorite Tank shall not exceed 20% opacity on a six-minute block average basis in a three-hour period. Compliance shall be determined in accordance with EPA Test Method 9, contained in 40 C.F.R. Part 60, Appendix A, or other method as approved by the Department.
[A-416-70-D-R (10/09/2012), BPT]

B. Control Equipment

Huhtamaki shall operate and maintain a demister pad on the Sodium Hypochlorite Tank vent stack to capture and control emissions.
[06-096 C.M.R. ch. 140, BPT]

C. Periodic Monitoring

1. Huhtamaki shall monitor and record the tank's annual sodium hypochlorite throughput, in gallons, on a monthly and 12-month rolling total basis.

2. Huhtamaki shall document and maintain records detailing all control equipment malfunctions and all maintenance activities related to the demister pad. The documentation shall include the date and nature of all demister pad failures.

[A-416-70-A-I (01/15/2002), BPT]

(21) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity, except for no more than five minutes in any one-hour period during which time visible emissions shall not exceed 30% opacity. Compliance shall be determined by an aggregate of the individual fifteen-second opacity observations which exceed 20% in any one hour.
[06-096 C.M.R. ch. 140, BPT/BACT]

(22) **General Process Sources**

Visible emissions from any general process source not listed in the Process Equipment section of this license shall not exceed an opacity of 20% on a six-minute block average basis, except for no more than one six-minute block average in a one-hour period. [06-096 C.M.R. ch. 101]

(23) **Semiannual Reporting** [06-096 C.M.R. ch. 140]

A. The licensee shall submit to the Bureau of Air Quality semiannual reports which are due on **January 31st** and **July 31st** 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 Department within seven calendar days of the due date.
C. 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.

(24) **Annual Compliance Certification**

Huhtamaki shall submit an annual compliance certification to the Department and EPA in accordance with Standard Condition (13) of this license. The annual compliance certification is due January 31st 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 Department 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 C.M.R. ch. 140]

(25) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, the licensee shall annually report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory. The emission statement shall be submitted by the date specified in 06-096 C.M.R. ch. 137.

(26) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

Origin and Authority	Requirement Summary	Enforceability
06-096 C.M.R. ch. 102	Open Burning	-
06-096 C.M.R. ch. 109	Emergency Episode Regulation	-
06-096 C.M.R. ch. 110	Ambient Air Quality Standard	-
06-096 C.M.R. ch. 116	Prohibited Dispersion Techniques	-
38 M.R.S. § 585-B, §§5	Mercury Emission Limit	Enforceable by State-only

(27) **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 C.F.R. Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. Examples of such units include refrigerators and any size air conditioners that contain CFCs. [40 C.F.R. Part 82, Subpart F]

(28) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Huhtamaki shall comply with the *Standard for Asbestos Demolition and Renovation,* 40 C.F.R. Part 61, Subpart M.

(29) **Expiration of a Part 70 license**

A. Huhtamaki shall submit a complete Part 70 renewal application at least six but no more than 18 months prior to the expiration of this air license.

B. Pursuant to Title 5 M.R.S. §10002, and 06-096 C.M.R. ch. 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 06-096 C.M.R. ch. 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**

(30) **New Source Review**

Huhtamaki is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emission license, and the NSR requirements remain in effect even if this 06-096 C.M.R. ch. 140 Air Emissions License, A-416-70-I-R, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 22 DAY OF February , 2019.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Cerne for
GERALD D. REID, COMMISSIONER

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

[Note: If a complete renewal application, as determined by the Department, is submitted at least six but no more than 18 months prior to expiration of the facility's Part 70 license, then pursuant to Title 5 M.R.S. §10002, all terms and conditions of the Part 70 license shall remain in effect until the Department takes final action on the Part 70 license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 03/17/2017
Date of application acceptance: 03/27/2017

Date filed with the Board of Environmental Protection:

This Order prepared by Colby Fortier-Brown, Bureau of Air Quality.

Filed
FEB 2 2 2019
State of Maine
Board of Environmental Protection