



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

BETH NAGUSKY
ACTING COMMISSIONER

**Red Shield Acquisition LLC
Penobscot County
Old Town, Maine
A-180-70-B-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #1**

After review of the license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section §344 and Section §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Facility	Red Shield Acquisition, LLC (Red Shield)
License Number	A-180-70-B-A
License Type	Part 70 502(b)(10) Change
NAICS Code	322110 Wood Pulp Mfg 221119 Electric Power Generation
Nature of Business	Pulp and Paper Manufacturing
Facility Location	Old Town, Maine
Date of Initial License Issuance	December 2, 2009
Date of Amendment Issuance	September 22, 2010
License Expiration Date	December 2, 2014

B. Emission Equipment

The following emission unit is addressed in this Part 70 License amendment: extension of the stack testing date for the Lime Kiln when firing natural gas.

C. Application Classification

The application for Red Shield does not include the licensing of increased emissions or the installation of new or modified equipment. The proposed extension to the lime kiln stack test date is considered a Part 70 Section 502(b)(10) change and have been processed under *Part 70 Air Emission License Regulations* 06-096 CMR 140 (last amended on December 24, 2005) .

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II. PART 70 SECTION 502(b)(10) DESCRIPTION – Lime Kiln Stack Test

Red Shield's Part 70 license A-180-70-A-I requires stack testing the lime kiln for NO_x and PM while firing natural gas prior to September 21, 2010 (condition 25(B)). The current testing contractor for Red Shield is scheduled to be on site for stack testing and CEM RATAs from October 28, 2010- November 4, 2010. In order to allow for one contractor mobilization, Red Shield has requested that the lime kiln stack testing requirement be extended approximately 7 weeks to coincide with the other scheduled stack testing and RATAs.

The Department approves the stack test extension for the lime kiln NO_x and PM tests while firing natural gas. Red Shield shall have until November 11, 2010 to perform the required tests.

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

The Department hereby grants the Part 70 License A-180-70-B-A pursuant to 06-096 CMR 140 and the pre-construction permitting requirements of 06-096 CMR 115; and subject air emission license A-180-70-A-I and the conditions below.

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

For each standard and special condition that is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

The following shall replace condition (25)(B) in air emission license A-180-70-A-I:

(25) Lime Kiln

B. Emissions from the Lime Kiln shall not exceed the following limits:

Pollutant	gr/DSCF	ppm	Ave Time	Compliance Method	Origin and Authority
PM	0.13 corrected to 10% O ₂	-	-	Stack Test (By November 11, 2010 firing natural gas and every other year thereafter on the current fuel)	40 CFR Part 63, Subpart MM alternative, and A-180- 71-BB-A (issued Sept. 21, 2009)
NO _x	-	170 dry basis, corrected to 10% O ₂	1 Hr Average	Stack Test (By November 11, 2010 firing natural gas and once every five years thereafter on the current fuel)	06-096 CMR 138, NO _x RACT, and A-180-71- BB-A (issued Sept. 21, 2009)
TRS	-	20 * dry basis corrected to 10% O ₂	12 Hr Block Average	CEM data	06-096 CMR 124, TRS

* Per 06-096 CMR 124, Section 5(C)(3)(b), the first four 12-hour block averages in a quarter which exceed the 20.0 ppm TRS limit are not considered violations of 06-096 CMR 124.

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Pollutant	lb/hr	Compliance Method
PM	32.9	Stack Test (every other calendar year)
PM ₁₀	32.9	Stack Test (upon request)
SO ₂	7.1	Stack Test (upon request)
NO _x	36.0	Stack Test (upon request)
CO	81.7	Stack Test (upon request)
VOC	1.2	Stack Test (upon request)
TRS	5.3	Stack Test (upon request)

[06-096 CMR 140, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 22nd DAY OF September, 2010.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brooks, Jr.
BETH NAGUSKY, ACTING COMMISSIONER

The term of this license shall be concurrent with the term of air emission license A-180-70-A-I.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 30, 2010

Date of application acceptance: August 31, 2010

Date filed with the Board of Environmental Protection _____

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.

