



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

EDWARD O. SULLIVAN
COMMISSIONER

INTERNATIONAL PAPER COMPANY) DEPARTMENTAL
 FRANKLIN COUNTY) FINDINGS OF FACT AND ORDER
 JAY, MAINE) AIR EMISSION LICENSE
 A-203-71-S-M) AMENDMENT #9

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

- ~~1. International Paper Company (IP) was issued Air Emission License #1431 for its Androscoggin Mill Jay, Maine facility on November 29, 1978. The license was subsequently amended on April 11, 1991 (A 203 71 C A), on September 25, 1992 (A 203 71 G M), on October 26, 1993 (A 203 71 J M), on June 30, 1994 (A 203 71 K M), on August 3, 1994 (A 203 71 L A), on June 7, 1995 (A 203 71 F A), on July 31, 1995 (A 203 71 M A), and on October 4, 1995 (A 203 71 R A).~~
2. IP has requested a minor revision to their Air Emission License to modify the language of the previous amendment (A-203-71-R-A) which summarized and identified the VOC RACT requirements which demonstrate compliance with Chapter 134 Section 3(A), Option (D), based on recent EPA comments of that language.

Specifically, EPA commented that Chapter 122 is not federally enforceable, therefore the RACT should require the operation of the scrubber. Since Chapter 124 is federally enforceable, EPA requested reference to Chapter 124 for control of the smelt tank emissions be included. In addition, EPA requested a justification why the Pulp Stock Washer Systems and Pulp Liquor Storage Tanks as currently configured were determined to be meeting RACT.

The modified language to replace the corresponding sections of the previous amendment (A-203-71-R-A) shall be as follows:

Pulp Stock Washer Systems and Pulp Liquor Storage Tanks

The Paper Industry Information Office performed a VOC RACT analysis on various VOC sources from a representative paper mill in Maine. From that analysis it was determined that the control of VOCs from the pulping area (which contain pulp stock washers) and the chemical recovery area (which contain pulp liquor storage tanks) would have a \$17,402/ton and \$29,089/ton cost effectiveness, respectively. Based on the economic impact, the control of

Serving Maine People & Protecting Their Environment

AUGUSTA
STATE HOUSE STATION 17
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
OFFICE LOCATED AT: RAY BUILDING, HOSPITAL STREET

PORTLAND
312 CANCO ROAD
PORTLAND, ME 04103
(207) 822-6300 FAX: (207) 822-6303

BANGOR
106 HOGAN ROAD
BANGOR, ME 04401
(207) 941-4570 FAX: (207) 941-4584

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, ME 04769
(207) 764-0477 FAX: (207) 764-1507

VOCs from these sources is therefore rejected as RACT. VOC emissions from the Pulp Stock Washer Systems and Pulp Liquor Storage Tanks as currently configured are determined to be meeting VOC RACT and the Department has determined that additional VOC controls are not feasible at this time.

Smelt Tanks 1 & 2

IP is required by Chapter 124 to meet a TRS emissions limit of 0.016 g/kg black liquor solids as H₂S (0.033 lb/ton black liquor solids as H₂S) from each smelt tank. In addition, IP is required by a license condition to control particulate emissions from Smelt Tanks 1 & 2 by a wet scrubber system. As a result, some of the VOC emissions from the Smelt Tanks 1 & 2 are also controlled. The limit on TRS emissions pursuant to Chapter 124 and the control of particulate emissions by a wet scrubber system is therefore determined to be meeting VOC RACT. The Department has determined that additional VOC controls for the Smelt Tank 1 & 2 are not feasible at this time.

3. ~~IP has requested a minor revision to their Air Emission License to modify the language of the previous amendment (A 203 71 R A) which identified the Recovery Boilers #1 and #2 capacities which are subject to the NOx RACT requirements of Chapter 138.~~

~~In the License Amendment A 203 71 R A, the Recovery Boilers #1 and #2 were identified as having the capacities of 1.98 (315 MMBtu/hr oil only) and 2.82 (405 MMBtu/hr oil only) MMlb BLS/day respectively.~~

~~IP has proposed that the Recovery Boiler capacities should be defined only by the dry black liquor firing rate since it is the most representative and appropriate capacity measurement. This determination is based on the fact that the dry black liquor firing rate can be constantly quantified. Other capacity ratings are a conversion of the dry black liquor firing rate utilizing variables that are not easily and readily measured nor do they remain constant over time. IP has therefore proposed that the Recovery Boilers have the following designated capacities, which shall replace the corresponding sections of the table in Section H.C. of License Amendment A 203 71 R A:~~

Equipment	Maximum Capacity	Fuel Type/Process Chemical	Control Equipment	Stack
Recovery Boiler #1	2.50 MMlb dry BLS/day	#6 fuel oil, black liquor	ESP	3
Recovery Boiler #2	3.44 MMlb dry BLS/day	#6 fuel oil, black liquor	ESP	3

~~Therefore, the Bureau of Air Quality Control has determined the minor revision to clarify the capacities of Recovery Boilers #1 and #2 to be acceptable. In addition, the clarification of the capacities will not affect facility emissions.~~

- ~~4. In addition, IP has requested a minor revision to their Air Emission License to change the date by which SO₂ emission testing was to be performed when NCGs are combusted in each Lime Kiln #1 and #2 without the presence of lime. Condition (oo)10. of Air Emission License #1431, which is found in License Amendment #6 (A-203-71-F-A), required that IP perform emission testing by December 31, 1995. IP has proposed a change in the date due to the fact that the kiln incinerator components were not completely operational until October 31, 1995 and therefore, there was not enough time to adequately address the Department requirements to submit an acceptable testing protocol.~~

~~The Bureau of Air Quality Control has thereby determined the minor revision to change the testing deadline to June 31, 1996 to be acceptable. In addition, the change in the deadline will not affect facility emissions.~~

ORDER

The Department hereby grants Air Emission License Minor Revision A-203-71-S-M, subject to the conditions found in Air Emission License #1431, in the Amendments:

~~_____ A-203-71-C-A, _____ A-203-71-G-M, _____ A-203-71-J-M,
_____ A-203-71-K-M, _____ A-203-71-L-A, _____ A-203-71-F-A,
_____ A-203-71-M-A, _____ A-203-71-R-A, _____ and in the following conditions:~~

The following shall replace Condition (tt)a. and (tt)d. of Air Emission License #1431:

- (tt) IP shall meet the following VOC RACT requirements:
- a. IP shall not utilize, without a prior license revision, sodium hypochlorite as a primary bleaching agent in Bleach Plant. IP shall operate the Bleach Plant Scrubber System when the Bleach Plant is in operation.
 - d. IP shall operate the Smelt Tank Scrubbers 1 & 2 when the Smelt Tanks 1 & 2 are in operation. IP shall meet a TRS emissions limit of 0.016 g/kg black liquor solids as H₂S (0.033 lb/ton black liquor solids as H₂S), as required by Chapter 124 from the Smelt Tanks 1 & 2.

INTERNATIONAL PAPER COMPANY) DEPARTMENTAL
FRANKLIN COUNTY) FINDINGS OF FACT AND ORDER
JAY, MAINE) AIR EMISSION LICENSE
A-203-71-S-M 4 AMENDMENT #9

~~The following shall replace Condition (oo)10. of Air Emission License #1431:~~

~~(oo) Lime Kilns #1 and #2~~

~~10. IP shall perform SO₂ emission testing when NCGs are combusted within each Lime Kiln #1 and #2 without the presence of lime in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other methods approved or required by the Department, by June 30, 1996.~~

~~IP shall submit a written report of the SO₂ emission demonstration and propose an SO₂ emission limitation that satisfies BPT by July 31, 1996. Following the Department's review and evaluation of the report, the license shall be amended to incorporate an SO₂ emission limit established by the Department.~~

The following are new Conditions:

(ww) This amendment shall expire concurrently with Air Emission License #1431.

DONE AND DATED IN AUGUSTA, MAINE THIS 13th DAY OF December, 1995.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brooks for
EDWARD O. SULLIVAN, COMMISSIONER

PLEASE NOTE THE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application November 30, 1995

Date of application acceptance November 30, 1995

Date filed with the Board of Environmental Protection _____

This Order prepared by Kim Hibbard, Bureau of Air Quality Control

