



*The Commonwealth of Massachusetts*  
*Executive Office of Environmental Affairs*  
*Department of Environmental Quality Engineering*  
*Western Region*

S. RUSSELL SYLVA  
Commissioner  
JOHN J. HIGGINS  
Regional Environmental Engineer

*436 Dwight Street, Springfield, Mass. 01103*  
*(413) 785-5327*

October 14, 1987

Erving Paper Company  
P.O. Box 158  
Erving, Massachusetts 01344

Attn: Anthony J. Greco

Re: Pioneer Valley APCD - Erving  
Regulation 310 CMR 7.05(e)3  
Erving Paper Company  
SIP Revision-Increase firing  
rate of 2.2% (by weight)  
Sulfur-in-fuel oil

Gentlemen:

The Department of Environmental Quality Engineering received on April 26, 1984, a Technical Support Document (TSD) prepared by ERSECO, Inc., of Braintree, Massachusetts, evaluating monitoring data collected as part of Erving's effort to obtain a revision in the State Implementation Plan (SIP) concerning sulfur dioxide. This revision would allow an increase in the firing rate limitation currently imposed upon your facility while burning 2.2% sulfur fuel oil and ensuring that the National Ambient Air Quality Standards (NAAQS) will not be violated.

Previously, the Department, on June 15, 1979, approved Erving's application to burn fuel oil with a sulfur content not in excess of 1.21 pounds per million b.t.u. heat release potential under the provisions of 310 CMR 7.05(1)(e)3 of the "Regulations". This approval was subject to a number of provisions, among them, that a total firing rate not to exceed 416 gallons per hour be imposed on their boilers, and that ambient air monitoring for sulfur dioxide be conducted at sites approved by this Department. The latter requirement was intended to determine if the NAAQS could be violated while burning this oil.

The monitoring site locations, shelters, and ventilation were approved on February 25, 1980, by the EPA Region I Office. Data from these stations were collected for a period of approximately three years.

As part of the SIP revision process, ERSECO Inc. selected the 1983 calendar year data for its TSD to support Erving Paper Mill's contention that NAAQS would not be violated while burning high sulfur oil at rates exceeding the

current limitation. Although there were some discrepancies between the method of data analysis used by ERSECO, Inc. and the method specified by this Department (detailed in a letter dated August 11, 1981), these did not affect the conclusions reached in this TSD. Information presented in the TSD and additional analysis performed by the Boston DEQE office indicated that a load limitation of 71% would ensure that NAAQS will not be violated. Consequently, this Department, pursuant to regulation 310 CMR 7.05(1)(e) 3 of the "Regulations", approves the burning of fuel oil with a sulfur content not to exceed 1.21 pounds per million b.t.u. heat release potential at a rate not exceeding 650 gallons per hour (71% of the maximum firing rate) at Erving Paper Mill's boilers at Erving, Massachusetts subject to the following conditions:

1. That this approval will only take effect after final rulemaking in the Federal Register.
2. That a submittal be made to this office detailing a steam limitation and alarm system to ensure that a maximum firing rate of 650 gallons per hour (71% of the maximum firing rate of No. 6 oil, 2.2% S (by weight) is not exceeded under any operating conditions.

Said system may consist of a physical derating of the boiler(s) by reducing the size of pipes, pumps, valves, etc.

Plans, specifications, standard operating and maintenance procedures for said system must be reviewed and approved in writing by the Department before higher sulfur oil may be used.

3. That initial compliance testing and subsequent annual yearly calibrations and verifications of system performance be made on the system submitted under (2) above.
4. That the submittal in (2) above include provisions for chart recording of necessary data to verify that the steam limitation is being met. Such charts will be kept on file for a period of two years after they are recorded and made available to Department personnel at their request for inspection.
5. That a load shedding program be submitted to the Department for use when the production rate is such that the steam limitation could be exceeded.
6. That stack testing to determine compliance with the particulate emission limitation be conducted in accordance with a time schedule developed by the Department.
7. That affirmation shall be made to comply with all applicable provisions and requirements set forth in the "Criteria for Burning High Sulfur Fuel Under the Provision of Regulation 5" (now 310 CMR 7.05) of the "Regulations for the Control of Air Pollution in the Pioneer Valley Air Pollution Control District", dated December 19, 1976, the aforementioned conditions, and all other applicable "Regulations" by executing the attached agreement, signed by an officer duly authorized by law to act on behalf of the company.



This approval may be suspended, modified or revoked by the Department at any time if, in the opinion of the Department, the facility is violating any Regulation or condition of this approval, and will be revoked at any time that, in the opinion of the Department, the facility is violating or contributing to a violation of an Ambient Air Quality Standard.

If you have any further questions, please contact the undersigned or David Howland, Air Section Chief, at this office.

Very truly yours,



Stephen F. Joyce, Deputy  
Regional Environmental Engineer  
Air, Solid and Hazardous Materials  
Western Region

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STATEMENT OF AGREEMENT

I am in receipt of the Massachusetts Department of Environmental Quality Engineering's (the "Department") letter dated October 14, 1987, stating that approval to burn higher sulfur content fuel under the provisions of Regulation 310 CMR 7.05 (1) (formerly called Regulation 5) of the "Regulations for the Control of Air Pollution in the Pioneer Valley Air Pollution Control District" (PVAPCD) has been granted to Erving Paper Company, for fossil fuel utilization at their facility located at Erving, Massachusetts.

As a corporate officer, I hereby agree that Erving Paper Company will abide by all of the requirements of Regulation 7.05 (1), all other applicable "Regulations", all provisos contained in the approval letter dated October 14, 1987, and the requirements set forth in the Department's "Criteria for Burning Higher Sulfur Fuel Under the Provisions of Regulation 5 of the Regulations for the Control of Air Pollution in the Pioneer Valley Air Pollution Control District".

If there is a violation of any applicable Ambient Air Quality Standard within the area of impact of the fossil fuel utilization facility located at Erving, Massachusetts, this approval will be revoked immediately.

I understand that this approval can be suspended, modified or revoked by the Department at any time if, in the opinion of the Department, the facility is violating or contributing to any violation of air quality standards or applicable regulations, or if stack testing and/or monitoring requirements are not met.

Name: *Schuyler Bush*  
Title: *VP Mfg.*  
Company: Erving Paper Company  
P. O. Box 158  
Erving, Massachusetts 01344  
Date: *11-6-87*

Received for the Department by: *David Howard*  
Division of Air & Hazardous Materials  
Date: *11/12/87*