STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL·PROTECTION

ANGUS S. KING, JR.
GOVERNOR

EDWARD O. SULLIVAN
COMMISSIONER

S.D. WARREN COMPANY	)	DEPARTMENTAL
SOMERSET COUNTY	)	FINDINGS OF FACT AND ORDER
SKOWHEGAN, MAINE	)	AIR EMISSION LICENSE
A-19-71-Y-M	)	AMENDMENT #15

After review of the air emission license minor revision information, 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. ~~S.D. Warren Company, Somerset Operations in Skowhegan (S.D. Warren), Maine was issued Air Emission License #2152 on January 26, 1983.~~

2. ~~S.D. Warren's Air Emission License was subsequently amended on July 9, 1986, September 21, 1987, January 20, 1989, August 23, 1989, January 9, 1990, June 14, 1990, May 14, 1992, July 7, 1992, January 10, 1994, on March 25, 1994, on September 29, 1994, on April 4, 1995, on June 7 1995, and on October 4, 1995. In addition S.D. Warren's licenses were transferred from S.D. Warren a subsidiary of Scott to S.D. Warren Company on December 20, 1994.~~

3. S.D. Warren has requested a minor revision to their Air Emission License to modify the language of the previous minor revision (A-19-71-W-M) 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-19-71-W-M) shall be as follows:

Pulp Stock Washer Systems and Pulp Liquor Storage Tanks

VOC emissions from most of the Pulp Stock Washer Systems and Pulp Liquor Storage Tanks are currently collected and incinerated within the Recovery Boiler or within the #1 Power Boiler and thus is determined to be meeting VOC RACT.

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 pulping areas (which contain pulp stock washers) and chemical recovery areas (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 VOCs from these sources is therefore rejected as RACT. Based in part on this information the Department determines that VOC emissions from the Pulp Stock Washer Systems and Pulp Liquor Storage Tanks as currently configured at S.D. Warren are meeting VOC RACT and the Department has determined that additional VOC controls are not feasible at this time.

Smelt Tanks #1 and #2

S.D. Warren is required by Chapter 124 to meet a TRS emissions limit of 0.016 g/kg black liquor solids as H_2S (0.033 lb/ton black liquor solids as H_2S) from each smelt tank. In addition, S.D. Warren is required by a license condition to control particulate emissions from Smelt Tanks #1 and #2 by a wet scrubber system. As a result, some of the VOC emissions from the Smelt Tanks #1 and #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 Tanks #1 and #2 are not feasible at this time.

ORDER

The Department hereby grants Air Emission License Minor Revision A-19-71-Y-M, subject to the ~~conditions found in Air Emission License #2152, in the following amendments:~~

~~A-19-71-A-A,~~	~~A-19-71-B-A,~~	~~A-19-71-E-A,~~	~~A-19-71-F-A,~~
~~A-19-71-G-A,~~	~~A-19-71-I-A,~~	~~A-19-71-K-A~~	~~A-19-71-L-M,~~
~~A-19-71-N-A,~~	~~A-19-71-R-M,~~	~~A-19-71-S-M,~~	~~A-19-71-U-A,~~
~~A-19-71-V-M,~~	~~A-19-71-W-M,~~	~~and in the~~ following conditions:	

S.D. WARREN COMPANY   )   DEPARTMENTAL
SOMERSET COUNTY   )   FINDINGS OF FACT AND ORDER
SKOWHEGAN, MAINE   )   AIR EMISSION LICENSE
A-19-71-Y-M   3   AMENDMENT #15

The following shall replace Condition (17)a. and (17)f. of Air Emission License #2152, Amendment #14:

(17)   S.D. Warren shall meet the following VOC RACT requirements:

    a.   S.D. Warren shall not utilize, without a prior license revision, sodium hypochlorite as a primary bleaching agent in the Bleach Plant. S.D. Warren shall operate the Bleach Plant Scrubber System or the backup scrubber system when the Bleach Plant is in operation.

    f.   S.D. Warren shall operate the Smelt Tank Scrubbers when the Smelt Tank #1 and/or #2 are in operation and shall meet a TRS emissions limit of 0.016 g/kg black liquor solids as H_2S (0.033 lb/ton black liquor solids as H_2S), as required by Chapter 124 from the Smelt Tanks #1 and #2.

The following are new Conditions:

(19)   This License Amendment #15 shall expire concurrently with Air Emission License #2152.

DONE AND DATED IN AUGUSTA, MAINE THIS 9th DAY OF January 1996.

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   January 8, 1996
Date of application acceptance   January 8, 1996

Date filed with the Board of Environmental Protection _____

FILED
JAN 1 0 1996
BOARD OF ENVIRONMENTAL PROT.
STATE OF MAINE

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