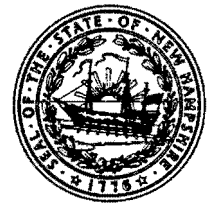




State of New Hampshire  
DEPARTMENT OF ENVIRONMENTAL SERVICES

64 No. Main Street, P.O. Box 2033, Concord, NH 03302-2033  
(603) 271-1370 FAX (603) 271-1381



September 24, 1997

Dr. Raymond H. Danforth  
Environmental Director  
Crown Vantage  
Berlin-Gorham Group  
650 Main Street  
Berlin, NH 03570-2431

**RE: Final NOx RACT Order ARD-97-003**

Dear Dr. Danforth: *Ray*

Enclosed is the Final RACT Order issued by the New Hampshire Department of Environmental Services, Air Resources Division ("NHDES-ARD"), to Crown Vantage concerning compliance with the Rules Governing the Control of Air Pollution PART Env-A 1211. The "proposed" RACT Order dated June 4, 1997 was revised based on comments received by you and by the US EPA. These revisions are consistent with the Division's testimony at the public hearing that was held on July 23, 1997.

If you have any questions regarding this matter, please contact Ms. Catherine A. Beahm of the Engineering Bureau of the Air Resources Division at (603) 271-6798.

Sincerely,

*Kenneth A. Colburn*

Kenneth A. Colburn  
Director  
Air Resources Division

Enclosure: Final NOx RACT Order ARD-97-003

cc: David Conroy, US EPA  
Timothy Drew, NHDES PIP Office  
Town Selectmen  
File

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Attn: Dr. Raymond H. Danforth  
Environmental Director  
Crown Vantage  
Berlin-Gorham Group  
650 Main Street  
Berlin, NH 03570-2431

**FINAL RACT ORDER  
ARD-97-003**

**A. INTRODUCTION**

This Proposed RACT Order is issued by the New Hampshire Department of Environmental Services, Air Resources Division ("NHDES-ARD") to Crown Vantage pursuant to RSA 125-C and the rules adopted pursuant thereto.

**B. PARTIES**

1. The New Hampshire Department of Environmental Services, Air Resources Division is a duly constituted administrative agency of the State of New Hampshire, having its principal offices at 64 North Main Street, Concord, NH 03302-2033, telephone number (603) 271-1370.
2. Crown Vantage owns and operates facilities in Berlin and Gorham, New Hampshire. The mailing address is 650 Main Street, Berlin, NH 03570-2431, telephone number (603) 342-2000. ("the Facility")

**C. STATEMENT OF FACTS AND LAW**

1. NHDES-ARD is responsible for adopting rules relative to the prevention, control, abatement, and limitation of air pollution in New Hampshire pursuant to RSA 125-C.
2. Effective May 20, 1994, NHDES-ARD adopted PART Env-A 1211 NITROGEN OXIDES (NO<sub>x</sub>).

3. The Facility filed a "NO<sub>x</sub> RACT Assessment Report" dated September 16, 1994 for the following devices:
  - a. Power Boiler #1 at the Cascade Mill,
  - b. Power Boiler #2 at the Cascade Mill,
  - c. Power Boiler #3 at the Cascade Mill,
  - d. Power Boiler #4 at the Cascade Mill,
  - e. Power Boiler #9 at the Burgess Mill,
  - f. Power Boiler #12 at the Burgess Mill,
  - g. Power Boiler #14 at the Burgess Mill,
  - h. Lift Station Emergency Diesel Generator at the Cascade Mill,
  - i. Chemical Recovery Unit #11 at the Burgess Mill,
  - j. #2 Lime Kiln at the Burgess Mill,
  - k. Yankee Hood Dryer for #10 Paper Machine at the Cascade Mill, and
  - l. Four Space Heaters.
  
4. The Facility proposed the following measures as RACT (reasonably available control technology):
  - a. Boiler #1 is fitted with low-NO<sub>x</sub> burners and a flue gas recirculation system and therefore complies with Env-A 1211.05(d)(3), (e) and (f).
  - b. Boiler #2 is fitted with low-NO<sub>x</sub> burners and a flue gas recirculation system and therefore complies with Env-A 1211.05(d)(3), (e) and (f).
  - c. Boiler #3's existing technology is RACT and the Facility will comply with the monitoring requirements of Env-A 1211.22, the recordkeeping requirements of Env-A 901.06 and the reporting requirements of Env-A 901.07.
  - d. Boiler #4 will comply with Section Env-A 1211.05(b) and (f).
  - e. Boiler #9 is fitted with low-NO<sub>x</sub> burners and a flue gas recirculation system and therefore complies with Env-A 1211.05(d)(3), (e) and (f).
  - f. Boiler #12's existing technology is RACT and the Facility will comply with the monitoring requirements of Env-A 1211.22, the recordkeeping requirements of Env-A 901.06 and the reporting requirements of Env-A 901.07.
  - g. Boiler #14 will comply with Section Env-A 1211.05(d)(5)b., (e) and (f).
  - h. The emergency diesel generator at the Cascade lift station will comply with Section Env-A 1211.11.
  - i. Chemical Recovery Unit #11's existing technology is RACT and the Facility will comply with the monitoring requirements of Env-A 1211.22, the recordkeeping requirements of Env-A 901.06 and the reporting requirements of Env-A 901.07.
  - j. The #2 Lime Kiln's current mode of operation is RACT and the Facility will comply with the monitoring requirements of Env-A 1211.22, the recordkeeping requirements of Env-A 901.06 and the reporting requirements of Env-A 901.07.

- k. The Yankee Hood Dryer for the #10 Paper Machine's existing technology is RACT.
- l. The four space heaters's existing technology is RACT.
5. NHDES-ARD responded with a letter of insufficiency on December 2, 1994 to the Facility's "NO<sub>x</sub> RACT Assessment Report" dated September 16, 1994.
6. The Facility submitted additional information related to NO<sub>x</sub> RACT in a letter dated February 22, 1995.
7. The Facility submitted comments on the alternative RACT demonstration for Boiler #3 on May 22, 1995 and June 19, 1995.
8. Pursuant to Env-A 1211.16(a), compliance shall be achieved no later than May 31, 1995.
9. The Facility submitted CEM data for Boiler #3 and the Chemical Recovery Unit #11 on May 9, 1997.

#### **D. ORDER**

Based on the above findings and determinations, NHDES-ARD hereby orders the Facility as follows:

1. Implement the following plan according to the following approved schedule:
  - a. For Boiler #1, the Facility shall continue to comply with Env-A 1211.05.
  - b. For Boiler #2, the Facility shall continue to comply with Env-A 1211.05.
  - c. For Boiler #3, the Facility shall comply with the NO<sub>x</sub> emission limitations of 0.45 lb/MMBTU on an annual average and 0.60 lb/MMBTU on a 24-hr average.
  - d. For Boiler #4, the Facility shall comply with Env-A 1211.05(b).
  - e. For Boiler #9, the Facility shall continue to comply with Env-A 1211.05.
  - f. For Boiler #12, the Facility shall comply with the NO<sub>x</sub> emission limitation of 0.45 lb/MMBTU on a 24-hr average.
  - g. For Boiler #14, the Facility shall comply with Env-A 1211.05.
  - h. For the emergency diesel generator at the lift station, the Facility shall comply with Env-A 1211.02(j).
  - i. For the Chemical Recovery Unit #11, the Facility shall comply with the NO<sub>x</sub> emission limit of 120 ppmwv (wet) corrected to 8% oxygen for any 24-hour calendar day average as calculated on the CEM.
  - j. For the #2 lime kiln, the Facility shall comply with the NO<sub>x</sub> emission limitation of 120 ppmwv (wet) corrected to 10% oxygen for any 24-hr calendar day average.
  - k. For the four space heaters, the existing technology is RACT.

- l. The Yankee hood dryer at the Cascade mill is no longer in operation, therefore RACT is no controls.
  - m. For the emergency diesel fire pump located at the Burgess mill, the Facility shall comply with Env-A 1211.02(j).
  - n. For the thermal oxidizer, RACT is current mode of operation.
  - o. In addition, the Facility shall follow the recordkeeping and reporting requirements of Env-A 901.06 and Env-A 901.07 for all NO<sub>x</sub> emitting sources at the facility. Records shall be maintained for at least 4 years.
2. Condition D.1. shall be incorporated in the final permit(s) for the applicable equipment for Crown Vantage.

Please address any correspondence and communication in reference to this Order to:

Director  
NHDES-ARD, Air Resources Division  
64 N. Main St., Caller Box 2033  
Concord, NH 03302-2033  
(603) 271-1370



Kenneth A. Colburn, Director  
Department of Environmental Services  
Air Resources Division

cc: Timothy Drew, PIP Office  
David Conroy, US EPA  
Town Selectmen  
File

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