

Metso Paper USA, Inc.)	Departmental
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A-851-71-A-N)	After-the-Fact

After review of the air emissions license 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:

Metso Paper USA, Inc. (Metso Paper) of Biddeford, Maine, has applied for an Air Emission License permitting the operation of emission sources associated with their custom paper machinery manufacturing facility.

B. Emission Equipment:

Metso Paper is authorized to operate the following equipment:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Fuel Type, % Sulfur</u>	<u>Post Combustion Ctrl Eqpmnt</u>	<u>Stack #</u>
Boiler #1	1.1	7.9	#2, 0.35%	None	1
Boiler #2	1.1	7.9	#2, 0.35%	None	1
Boiler #3	1.4	10.0	#2, 0.35%	None	2
Dryer	1.0	10.6	Propane	None	4

Process Equipment

<u>Equipment/Process</u>	<u>Prod. Rate</u>	<u>Pollutant Emitted</u>	<u>Control Device</u>	<u>Stack #</u>
Paint Spray Booth #6	varies	PM, VOC	Fabric Filters, HVLP guns	5,6,7
Welding Anti-Spatter Spray Application	varies	HAP	None	fugitive

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Insignificant Activities

<u>Name</u>	<u>Description</u>
Boiler #4	0.9 MMBtu/hr, #2 fired boiler
Welding Operations	Combination of MIG, TIG stick and flux core welding w/approx. 83% MIG welding and emissions < 0.1 lb/hr and 1.0 lb/day
Metal Prep Wash Tank	Hot water wash tank used to remove lubricant and cutting oil from welded honeycomb strips; emissions negligible
Grit Blasting	Enclosed and controlled with baghouses that do not vent outside

C. Application Classification:

Metso Paper is classified as an existing source that is applying for its first air emission license, after the fact. The Department has determined the facility is a minor source and the application has been processed through Chapter 115 of the Department’s regulations.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction:

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Department regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

Process Description

Metso Paper engineers and manufactures custom paper machinery, primarily paper drying equipment. The machinery and equipment are manufactured from various metal stock including ductile iron, aluminum, mild carbon steel, and 304 and 316 stainless steel. The production operation includes spray painting, metal cutting, machining, welding and metal preparation.

B. Boilers #1 - #3:

Boilers #1 - #3 were manufactured in 1988, 1998 and 1994 with maximum design capacities of 1.1, 1.1 and 1.4 MMBtu/hr, respectively. The Boilers are not subject to EPA’s New Source Performance Standards (NSPS) Subpart Dc, for boilers with a heat inputs of 10 MMBtu/hr or greater and manufactured after July 9,

1989. All three boilers fire #2 fuel oil; Boilers #1 and #2 vent to combined stack #1; Boiler #3 vents to stack #2.

BACT for Boilers #1- #3 is the following:

1. The firing of #2 fuel oil with a maximum sulfur content of 0.35% by weight;
2. A NOx emission limit based on data for boilers of similar age and operation;
3. PM, CO and VOC emission limits based on AP-42 data dated 9/98 for oil fired boilers; and,
4. Visible emissions from each of the Boilers' stacks (stacks #1 and #2) shall not exceed 20% opacity on a 6-minute block average.

C. Dryer:

The dryer fires propane with a maximum design capacity of 1.0 MMBtu/hr.

BACT for the Dryer is the following:

1. The firing of propane;
2. PM, NOx, CO and VOC emission limits based on AP-42 data dated 10/96 for propane burning emission units; and
3. Visible emissions from the Dryer's stack (stack #4) shall not exceed 10% opacity on a 6-minute block average.

D. Process Equipment:

Metso Paper operates Paint Spray Booth #6 for coating various metal parts and products produced at Metso Paper. Paint is applied to the products via a hand-held high volume/low pressure (HVLP) paint spray gun. Air is drawn through polyester filters along the back wall of the booth and vented outside through three horizontal exhaust fans. The paints used in the spray booth contain VOCs and Hazardous Air Pollutants (HAPs). PM is also emitted in the painting process. Maximum potential VOC and HAP emissions from the paint spray booth have been calculated at 940 and 1,667 lb/year, respectively, based on a maximum paint application of 4 hours per day and 50 days per year. The paint used in the paint spray booth may emit Toluene, Xylene, Ethylbenzene and Methanol. These hazardous air pollutants are not emitted in amounts greater than the DEP's facility threshold value of 1 ton per year. Metso Paper shall maintain records to demonstrate that total HAPs from the Paint Spray Booth do not exceed 1 ton per year, on a 12 month rolling total basis.

Metso Paper applies anti-spatter spray contained in hand spray cans as part of their welding operation. The anti-spatter spray contains methylene chloride, which is a HAP. Potential emissions of methylene chloride from Metso Paper have been calculated at 8,711 lb/year, based on continuous application of the anti-spatter spray.

Both the painting process and the anti-spatter application are considered surface coating of miscellaneous metal parts as defined in MEDEP Chapter 129 "Surface

Coating Facilities.” Facilities may be exempted from the emission limitations of Chapter 129 if the following criteria are met:

- The maximum theoretical emissions from all surface coating operations are limited by permit or order of the Department to 1,666 lb or less in any calendar month;
- The owner or operator subject to the Chapter is and has at all times been in compliance with the maximum theoretical emission limitation since the issuance of the permit or order of the Department; and,
- The total actual emissions from the surface coating facility have not exceeded 1,666 lb in any calendar month since January 1990.

Metso Paper shall therefore not exceed 1,500 lb/month of VOC from Paint Spray Booth #6, and 5,000 lb/year of HAPs from the Anti-Spatter Spray Application, and shall submit documentation to the Department within one month of the signature date of this license to demonstrate that the facility has not exceed 1,666 lb emitted from the surface coating equipment in any calendar month since January 1990.

BACT for the Process Equipment is the following:

1. A VOC limit of 1,500 lb/month from Paint Spray Booth #6;
2. The use of HVLP paint spray guns and polyester filters in Paint Spray Booth #6;
3. A HAP limit of 5,000 lb/year from the application of Anti-Spatter Spray;
4. Documentation submitted to the Department within one month of the signature date of this license to meet the requirements of Chapter 129; and
5. Visible emissions from the Paint Spray Booth #6 vents shall not exceed 10% opacity on a 6 minute block average basis, except for no more than 1 six minute block average in a 1 hour period.

E. Annual Emission Restrictions:

Metso Paper shall not exceed the following limits on a 12-month rolling total basis:

Total Allowable Annual Emission for the Facility
(used to calculate the annual license fee)

Pollutant	Boiler #1	Boiler #2	Boiler #3	Dryer	Paint Booth	Anti-Spatter	Tons/year
PM	0.07	0.07	0.09	0.02	--	--	0.25
PM ₁₀	0.07	0.07	0.09	0.02	--	--	0.25
SO ₂	1.70	1.70	2.16	0.01	--	--	5.57
NO _x	1.69	1.69	2.15	0.65	--	--	6.18
CO	0.17	0.17	0.22	0.09	--	--	0.64
VOC	0.01	0.01	0.01	0.02	9.0	--	9.05
HAP	--	--	--	--	<1.0	2.5	<3.5

III. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for an after-the-fact renewal shall be determined on a case-by case basis. Based on the information available in the file, and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-851-71-A-N subject to the following conditions:

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (Title 38 MRSA §347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115.
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both.
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive

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- dust, and shall submit a description of the program to the Department upon request.
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353.
 - (6) The license does not convey any property rights of any sort, or any exclusive privilege.
 - (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions.
 - (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request.
 - (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license.
 - (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.
 - (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
 - (A) perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 - (i) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
 - (ii) pursuant to any other requirement of this license to perform stack testing.

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- (B) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - (C) submit a written report to the Department within thirty (30) days from date of test completion.
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- (A) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
 - (B) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - (C) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation.
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods,

at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

SPECIFIC CONDITIONS

(16) Boilers #1, #2 and #3

- (A) Boilers #1, #2 and #3 shall fire #2 fuel oil with a maximum sulfur content of 0.35% by weight. Compliance shall be demonstrated through fuel receipts showing the sulfur content of the fuel.
- (B) Emissions from the Boilers shall not exceed the following:

**Boiler #1, #2 and #3 Emission Limits
(lb/hr per boiler)**

	Boilers #1 and #2	Boiler #3
PM	0.02	0.02
PM ₁₀	0.02	0.02
SO ₂	0.39	0.50
NO _x	0.39	0.50
CO	0.04	0.05
VOC	0.01	0.01

- (C) Visible emissions from each of the Boilers' stacks (stacks #1 and #2) shall not exceed 20% opacity on a 6-minute block average.

(17) Dryer

- (A) The dryer shall fire propane as fuel, and shall not exceed the following emissions:

**Dryer Emission Limits
(lb/hr)**

	Dryer
PM	0.01
PM ₁₀	0.01
SO ₂	0.01
NO _x	0.15
CO	0.02
VOC	0.01

- (B) Visible emissions from the Dryer's stack (stack #4) shall not exceed 10% opacity on a 6-minute block average.

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- (18) Surface Coating Emissions
- (A) Metso Paper shall not exceed 9 tons/year and 1500 lb/month of VOC from Paint Spray Booth #6. The ton/year limit shall be on a 12 month rolling total basis; the lb/month limit shall be on a calendar month basis. Compliance shall be demonstrated through records maintained on a calendar month basis showing the amount of paint used in the Paint Spray Booth, the percent VOC for each type of paint, and the total amount of VOC emitted from the spray booth for the month. The most recent twelve consecutive calendar month records shall be used to show compliance with the ton/year emission limit.
 - (B) Metso Paper shall not exceed 1 ton of HAPs per year from Paint Spray Booth #6. Compliance shall be demonstrated through monthly usage records showing the percent HAP of the paint used that month. The most recent twelve consecutive month records shall be used to show compliance with the annual limit on a 12 month rolling total basis.
 - (C) Metso Paper shall continue to operate HVLP paint spray guns in Paint Spray Booth #6. Metso Paper shall continue to operate and maintain polyester filters in Paint Spray Booth #6.
 - (D) Visible emissions from the Paint Spray Booth #6 vents shall not exceed 10% opacity on a 6 minute block average basis, except for no more than 1 six minute block average in a 1 hour period.
 - (E) Metso Paper shall not exceed 2.5 ton of HAPs per year from Anti-Spatter Spray Application. Compliance shall be demonstrated through monthly usage records showing the percent HAP of the Anti-Spatter Spray used that month. The most recent twelve consecutive month records shall be used to show compliance with the annual limit on a 12 month rolling basis.
- (22) Metso Paper shall pay the annual air emission license fee within 30 days of March 31 of each year. Pursuant to 38 MRSA §353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under 38 MRSA §341-D, subsection 3.

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(23) The term of this Order shall be for five (5) years from the signature below.

DONE AND DATED IN AUGUSTA, MAINE THIS _____ DAY OF _____ 2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: January 7, 2003

Date of application acceptance: February 5, 2003

Date filed with the Board of Environmental Protection: _____

This Order prepared by Rachel E. Pilling, Bureau of Air Quality