

**Wausau Paper Specialty Products, LLC**  
**Franklin County**  
**Jay, Maine**  
**A-149-77-1-A**

**Departmental**  
**Findings of Fact and Order**  
**New Source Review License**  
**Amendment #1**

After review of the 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

FACILITY	Wausau Paper Jay Maine Mill (Wausau Paper)
CURRENT LICENSE NUMBER	A-149-70-C-R/A
LICENSE TYPE	New Source Review
NAICS CODES	322121
NATURE OF BUSINESS	Paper Mill
FACILITY LOCATION	1 Mill Street, Jay
INITIAL LICENSE ISSUANCE DATE	August 14, 2000
RENEWAL ISSUANCE DATE	November 2, 2005
LICENSE EXPIRATION DATE	November 2, 2010

Wausau Paper (Wausau) has requested an amendment to their License in order to increase the facility-wide VOC emission limit. To better compete in the marketplace, Wausau has acquired several food grade paper lines from a sister facility. In order to produce these lines Wausau needs to use larger quantities of VOC containing coating formulations than their current Air Emission License would allow. Therefore, Wausau is requesting to increase their total facility VOC emissions to 73.25 tons/year.

B. Application Classification

The modification of a major source is considered a major modification based on whether or not expected emissions increases exceed the "Significant Emission Increase Levels" as given in *Definitions Regulation*, 06-096 CMR 100 (last amended December 1, 2005).

The emission increases are determined by subtracting the average actual emissions of the 24 months preceding the modification (or representative 24 months) from the maximum future license allowed emissions. The results of this test are as follows:

Pollutant	Average Past Actuals 5/05 – 4/07 (ton/year)	Future Permit (ton/year)	Net Change (ton/year)	Significance Level (ton/year)
VOC	34.25	73.25	39.0	40

Therefore, this amendment is determined to be a minor modification under *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 1, 2005) and has been processed as such.

## 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 06-096 CMR 100. 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 06-096 CMR 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

### B. Paper Machines (9PM, 11PM) and Coating Prep Area (1CP)

Wausau has proposed to modify their License to increase the VOC emissions limitations. This will allow Wausau to incorporate new food grade paper lines from sister mills, that require increased usage of VOC containing coatings. As a minor modification, the paper machines and coating prep area (1CP) are subject to BACT. A BACT evaluation was conducted on various VOC control technologies and it was determined that any add-on control equipment was either practically or economically unfeasible. Therefore, BACT for the paper machines and 1CP shall consist of good operating practices to minimize PM and VOC emissions, and the continual reevaluation of new coating additives to reduce VOC content.

The paper machines and 1CP are subject to *Paper Coating Regulation*, 06-096 CMR 123 (last amended October 2000). The Department finds the use of low-VOC-content coatings (not to exceed 2.9 pounds of VOC per gallon less water and exempt compounds) to meet the requirements of 06-096 CMR 123 and represent BACT for the paper machines and 1CP at Wausau. Because Wausau is

not a major source of HAPs as defined in 40 CFR, Part 63.2, the paper machines and 1CP are not subject to the requirements of 40 CFR, Part 63, Subpart JJJJ for Paper and Other Web Coating.

Periodic Monitoring

Periodic Monitoring shall consist of records documenting the VOC-content of coatings used in the paper machines and 1CP and the amount of each coating used on a monthly and 12-month rolling total basis, in accordance with the record keeping procedures outlined in 06-096 CMR 123, Section D.

C. Facility Emissions

1. Wausau shall not fire in excess of 11,680,000 gallons of #6 fuel oil, with a maximum sulfur content not to exceed 2.0% by weight in the boilers, based on a 12 month rolling total.
2. Wausau shall not fire in excess of 10,000 gal of spec. waste oil with a sulfur content not to exceed 2.0% by weight in the boilers, based on a 12 month rolling total.
3. The coating used in the paper machines and 1CP shall not exceed 2.9 lb VOC/gal of coating (excluding water and exempt compounds).
4. Wausau shall not exceed the following facility-wide emissions, on a 12 month rolling total:

**Total Licensed Annual Emissions for the Facility**

**Tons/year**

(used to calculate the annual license fee)

	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
<b>Total TPY</b>	<b>131.89</b>	<b>123.13</b>	<b>1850.60</b>	<b>352.20</b>	<b>72.19</b>	<b>73.25</b>

**III. AIR QUALITY ANALYSIS**

Wausau Paper previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this minor modification.

**ORDER**

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

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

