



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE  
GOVERNOR

PATRICIA W. AHO  
COMMISSIONER

**Verso Bucksport LLC  
Hancock County  
Bucksport, Maine  
A-22-77-13-M**

**Departmental  
Findings of Fact and Order  
New Source Review  
NSR #11**

**FINDINGS OF FACT**

After review of the Minor Revision application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

**I. REGISTRATION**

A. Introduction

Facility	Verso Bucksport LLC (Verso Bucksport)
License Amendment Type	06-096 CMR 115 Minor Revision
NAICS Code	322121 (pulp mill that produces paper)
Nature of Business	Groundwood and thermomechanical pulp; papermaking
Facility Location	2 River Road, Bucksport, Maine

Verso Bucksport LLC (Verso Bucksport) operates a pulp and paper mill and is licensed as a major source through its Part 70 Air Emission License (A-22-70-A-I, December 30, 2004) with various Part 70 amendments and New Source Review amendments.

Verso Bucksport has submitted a New Source Review minor revision to address the averaging time for the carbon monoxide (CO) emission limit from Boiler 5 of 0.08 lb/MMBtu, requesting it be reverted back to the originally licensed one hour basis and to have compliance with the limit be demonstrated via stack testing. Minor revision A-22-77-12-M was issued May 27, 2014 to establish the CO averaging time on a 30-day rolling average since Verso Bucksport was planning to install a CO continuous emissions monitoring system (CEMS) on the unit for operational and compliance purposes. However, due to an insufficient analyzer span range, Verso Bucksport has requested to return to the originally licensed averaging time and will not be installing a certified CEMS.

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B. Emission Equipment

The emission unit addressed in this amendment is natural gas fired Boiler 5, rated at 371 MMBtu/hr heat input.

C. Application Classification

This minor revision to revise the averaging time on the CO lb/MMBtu limit for Boiler 5 will not increase emissions. The licensed concentration, mass emission, and tons/year limits for CO from the unit will remain the same. Therefore, the Department has classified the application as a New Source Review minor revision and the revision request has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended).

## II. MINOR REVISION DESCRIPTION

The planned installation of a CO continuous emission monitoring system (CEMS) on Boiler 5, a 371 MMBtu/hr natural gas fired boiler, for operational and compliance purposes is not moving forward as proposed and Verso Bucksport has requested that the requirements addressing a CEMS and establishing a 30-day averaging time in air emission license minor revision A-22-77-12-M be removed.

Air emission license amendment A-22-77-11-A was issued on January 17, 2014 to allow the conversion of the Boiler 5 from oil to natural gas. The amendment included a CO limit of 0.08 lb/MMBtu and 29.68 lb/hr, with compliance demonstrated by a stack test performed upon request of the Department. With minor revision A-22-77-12-M (May 2014), Verso Bucksport requested the use of a CO CEMS and a 30 day rolling average for the 0.08 lb/MMBtu limit. The 30-day averaging time was to begin once the CO CEMS was certified, with the CO lb/hr limit to be based on stack tests performed upon request of the Department.

Verso Bucksport installed a CO analyzer and discovered the 0-50 ppm range of the analyzer wasn't sufficient to cover all of the operating scenarios. During startups, shutdowns, and load changes, the emissions exceeded the span range of the analyzer for brief periods of time. The analyzer stopped recording when measurements got out of range; however, if the monitor span were changed to cover the various operating scenarios (startup/shutdown), the accuracy would be lost at the very low ppm normal operation range.

In order to install a compliant CO CEMS, Verso Bucksport would need to install and certify either a dual range analyzer or a second analyzer. The facility has stated that at this time, neither option seems feasible.

Verso Bucksport had proposed the CO CEMS as a single analyzer option with the request initiating from facility, not due to regulatory requirements. Boiler 5 is a natural gas fired unit and, as such, does not have applicable CO emission limits or monitoring requirements under 40 CFR Part 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heater*. In addition, 06-096 CMR 117, *Source Surveillance – Emissions Monitoring*, as amended, does not specifically require a CO CEMS for this type and sized unit.

The Department approves removing the requirements in air emission license minor revision A-22-77-12-M. The CO averaging time and CO compliance demonstration for Boiler 5 will remain as written in air emission license amendment A-22-77-11-A: 0.08 lb/MMBtu and 29.68 lb/hr on an hourly basis, with compliance demonstrated by a stack test performed upon request of the Department using the appropriate stack test method.

**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.

The Department hereby grants Air Emission License A-22-77-13-M, subject to the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

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4

Departmental  
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NSR #11

**SPECIFIC CONDITIONS**

The conditions in Air Emission License A-22-77-12-M shall be deleted and are no longer applicable.

DONE AND DATED IN AUGUSTA, MAINE THIS *13* DAY OF *August*, 2014.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Marc Allen Robert Corne for*  
PATRICIA W. AHO, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: June 12, 2014

Date of application acceptance: June 12, 2014

Date filed with the Board of Environmental Protection:

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.

