



DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

EDWARD O. SULLIVAN
COMMISSIONER

Lincoln Pulp and Paper Co.)	Departmental
Penobscot County)	Finding of Fact and Order
Lincoln, Maine)	Air Emission License
A-177-71-J-M)	Amendment #8

After review of the air emissions license application, staff investigation reports and other documents in the applicants 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:

I. REGISTRATION

Lincoln Pulp and Paper Company, Inc. (LPP), located in Lincoln, has submitted a letter outlining LPP's compliance status regarding provisions of Chapter 134 - Reasonable Available Control Technology (RACT) for facilities that emit volatile organic compounds (VOC) as described in Section 3(A)(4), Option D: RACT control for pulp and paper processes. This minor revision summarizes the Chapter 134 requirements applicable to the LPP mill.

II. REVISION DESCRIPTION

LPP operates the following sources which are eligible to achieve compliance with VOC RACT pursuant to Chapter 134, Option (D) of Section 3(A), as described below:

- a. Bleach Plant
- b. Waste Water Treatment Plant
- c. Pulp Stock Washers and Pulp Liquor Storage Tanks
- d. Digester System, Multiple Effect Evaporator System, Smelt Tank, and Lime Kiln

Bleach Plant

LPP is required, pursuant to Chapter 122, to collect emissions from the Bleach Plant and have the chorine and chlorine dioxide emissions controlled by the Bleach Plant Scrubber System. Total facility Bleach Plant chlorine and chlorine dioxide emissions are each limited to 3.0 lb/hr after control by the wet scrubber system. As a result of this control requirement, some of the VOC emissions from the bleach plant are also collected and controlled by the bleach plant scrubber system. Furthermore, LPP has reduced the use of chlorine as the primary bleaching agent by substitution with

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chlorine dioxide and hydrogen peroxide. LPP does not use sodium hypochlorite as a primary bleaching agent.

The control of emissions from the bleach plant by the bleach plant scrubber system pursuant to Chapter 122 (for the control of chlorine and chlorine dioxide emissions), and the reduced use of chlorine as the primary bleaching agent by substitution with chlorine dioxide and hydrogen peroxide has been determined to meet VOC RACT. The Department has determined that additional VOC controls for the bleach plant are not feasible at this time.

Waste Water Treatment Facility

LPP is required by Federal regulation to comply with their National Pollution Discharge Elimination System (NPDES) permit. By complying with their NPDES permit, LPP's VOC emissions from its waste water treatment facility are determined to meet VOC RACT.

Pulp Stock Washers and Pulp Liquor Storage Tanks

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 the pulping area (which contain pulp stock washers) and the chemical recovery area (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. VOC emissions from the Pulp Stock Washer Systems and Pulp Liquor Storage Tanks as currently configured are determined to be meeting VOC RACT and the Department has determined that additional VOC controls are not feasible at this time.

Digester System, Multiple Effect Evaporator System, and Smelt Tank

LPP is required by Chapter 124 to collect emissions from the Digester System and the Multiple Effect Evaporator System. The total reduced sulfur (TRS) emissions from these sources are to be collected and incinerated within the Lime Kiln or with Power Boiler #8 as backup. As a result, VOC emissions from the Digester System and the Multiple Effect Evaporator System are controlled through incineration.

The control of VOC emissions from the Digester system and the Multiple Effect Evaporator System by incineration, which complies with Chapter 124 for the control of TRS emissions, is determined to be meeting VOC RACT. The Department has determined that additional VOC control from the Digester system and the Multiple Effect Evaporator System are not feasible at this time.

Smelt Tank

LPP is required by Chapter 124 to meet a TRS emissions limit of 0.033 lb/ton black liquor solids as H₂S. In addition, the particulate emissions from this source are required by the license to be controlled by demister system. As a result, some of the VOC emissions from the Smelt Tank are also controlled. The control of emissions from the Smelt Tank by the demister, which complies with the license for the control of particulate emissions and the TRS emission limit of Chapter 124 is therefore determined to be meeting VOC RACT. The Department has determined that additional VOC controls for the Smelt Tank are not feasible at this time.

Lime Kiln

LPP is required to maintain adequate combustion conditions within the Lime Kiln to meet a TRS emissions limit of 20 ppmv corrected to 10% O₂ on a dry basis, as required by Chapter 124. As a result, VOC emissions from the lime kiln are also controlled by maintaining adequate combustion conditions.

The control of VOC emissions from the Lime Kiln by maintaining adequate combustion conditions, which complies with Chapter 124 for the control of TRS emissions, is therefore determined to be meeting VOC RACT. The Department has determined that additional VOC controls for the lime kiln are not feasible at this time.

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, and~~
- ~~will not violate applicable ambient air quality standards, or increment standards either alone or in conjunction with emissions from other sources.~~

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Therefore the Department grants this amendment A-177-71-J-M, ~~subject to the conditions found in air emission license A 177 71 A/R, subsequent amendments,~~ in addition to the following conditions:

- (1) LPP shall meet the following VOC RACT requirements:
- a. LPP shall operate the bleach plant scrubber when the bleach plant is in operation.
 - b. LPP shall comply with the terms and conditions of the facility's NPDES permit.
 - c. LPP shall collect and control emissions from the digester system and the multiple effect evaporator system for TRS control as required by Chapter 124 of the Department's regulations.
 - d. LPP shall operate the smelt tank demister when the smelt tank is in operation and shall not exceed the emission limits set forth in Chapter 124 of the Department's regulation from the smelt tank.
 - e. LPP shall meet a TRS emissions limit of 20.0 ppmv corrected to 10% O₂ on a dry basis, as required by Chapter 124 of the Department's regulations from the lime kiln.

(2) The term of this order shall be concurrent with the term of air emission license A-177-71-A/R

DONE AND DATED IN AUGUSTA, MAINE THIS 18th DAY OF December 1995.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brooks for
Edward O. Sullivan, Commissioner

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: May 31, 1995

Date of application acceptance: May 31, 1995

Date filed with Board of Environmental Protection: _____

This order prepared by Edwin L. Cousins, Bureau of Air Quality Control

