



TECHNICAL SUPPORT DOCUMENT

Amendments to COMAR 26.11.14 Control of Emissions from Kraft Pulp Mills

Purpose of the New Regulations/Amendments

The primary purpose of this action is to accurately describe the Volatile Organic Compound (VOC) control system and requirements, to incorporate existing NO_x RACT requirements into this Chapter, amend the use of the word “allowance” to read “NO_x Ozone Season Allowance” and to clarify that the Monitoring and Reporting Requirements apply to the owner of a boiler and combustion turbine at a Kraft pulp mill.

Background

Nitrogen Oxide (NO_x) Emissions

The NO_x emissions discharge through a common stack and are currently subject to reasonably available control technology (RACT) requirements under COMAR 26.11.09.08 and 26.11.14.07A(2)(b) respectively. RACT requires the units to reduce NO_x emissions to meet an emissions rate of 0.70 pounds per million Btu during the period May 1 to September 30 (ozone season) of each year and a rate of 0.99 pounds per million Btu for the rest of the year. COMAR 26.11.14.07 prohibits total NO_x ozone season emissions from the NewPage Kraft pulp mill stack from exceeding 947 tons, unless the pulp mill acquires an allowance for each ton of NO_x they emit over 947 tons. The regulation allows the pulp mill to secure up to 95 allowances for each period in which they exceed the 947 ton emission cap.

Volatile Organic Compounds (VOC) Emissions

In 2001, Regulation .06 (Control of Volatile Organic Compounds) was added to COMAR 26.11.14 for the control of VOC emissions from several process installations at Kraft pulp mills. The regulation established RACT standards to specifically control VOC emissions from Kraft pulp mill operations statewide that have actual emissions of 20 pounds or more of VOCs per day and the potential to emit total plant-wide VOC emissions of 25 tons or more per year. In addition, Kraft pulp mills are required to install VOC emission controls to meet the requirements of the Paper and Pulp MACT (40 CFR Part 63, Subpart S).

Affected Sources

This amendment affects two coal fired units and one gas fired unit at the Kraft pulp mill located in Luke, Maryland.

Requirements

The proposed amendments to the regulation do not establish any new standards or requirements from fuel burning equipment located at Kraft pulp mills. The action primarily clarifies processes and consolidates requirements into a unique chapter of COMAR pertaining to Kraft pulp mills. The revisions to the regulation:

- Clarify that air emissions from brown stock washers are to be collected and combusted;
- Clarify that evaporators, digester blow tank systems, and brown stock washers shall be controlled by removing 90 percent or more of the condensate VOC loading by demonstrating a VOC removal or destruction efficiency of the condensate stream stripper of 90 percent or greater or a system analysis of these units;
- Allow the use of other approved methods by the Department as part of a State Implementation Plan (SIP) to demonstrate the collective VOC removal efficiency of the condensate steam stripper and other control systems as required;
- Include the requirement that Kraft pulp mills must meet an emission rate of 0.70 pounds of NO_x per million Btu in addition to an emission limit of 947 tons of NO_x during the period May 1 through September 30 of each year;
- Changes the word(s) “allowance” or “NO_x allowance” used in §B(2), §B(3) and §C(1) and (2) of Regulation .07 to “NO_x ozone season allowance”;
- Changes reference to COMAR 26.11.01.10G(2)(d) in D(2) of Regulation .07 regarding the submission of CEM quarterly reports to the Department to COMAR 26.11.01.11E(2);

Expected Emissions Reductions

There is no emission reduction expected as a result of this action.

Comparison to Federal Standards

No. This action codifies existing standards, clarifies processes and consolidates requirements into new chapter COMAR 26.11.14.

Economic Impact on Affected Sources, the Department, other State Agencies, Local Government, other Industries or Trade Groups, the Public

There is no economic impact on affected sources or the Department.

Economic Impact on Small Businesses

The affected source does not fit the definition of a small business.

Submission to EPA as Revision to Maryland's SIP (or 111(d) Plan, or Title V Program)

These amendments will be submitted to EPA to be included in the approved SIP.