



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI  
GOVERNOR

DAVID P. LITTELL  
COMMISSIONER

**Cousineau Wood Products of Maine, LLC**  
**Somerset County**  
**North Anson, Maine**  
**A-103-71-L-R (SM)**

**Departmental**  
**Findings of Fact and Order**  
**Air Emission License**

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

Cousineau Wood Products of Maine, LLC (Cousineau) of North Anson, Maine has applied to renew their Air Emission License permitting the operation of emission sources associated with their hardwood lumber sawing facility.

B. Emission Equipment

The following equipment is addressed in this air emission license:

**Fuel Burning Equipment**

<u>Equipment</u>	<u>Maximum Capacity MMBtu/hr</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type, % sulfur</u>	<u>Post Combust. Control</u>	<u>Stack #</u>
Boiler #1	27	3 tons/hr	Sawdust, bark, chipped pallets, wood with paint residue, used oil	Fly ash Reinjection	1
Boiler #2	20	133 gal/hr	#6, 0.5%		2
Generator #1	4.0	29.2 gal/hr	Diesel, 0.05%		4
Generator #2	4.0	29.2 gal/hr	Diesel, 0.05%		5
Generator #3	2.34	17.1 gal/hr	Diesel, 0.05%		6
Emergency Generator	1.22	8.9 gal/hr	Diesel, 0.05%		3

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688 FAX: (207) 287-7826  
RAY BLDG., HOSPITAL ST.

BANGOR  
106 HOGAN ROAD  
BANGOR, MAINE 04401  
(207) 941-4570 FAX: (207) 941-4584

PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769-2094  
(207) 764-0477 FAX: (207) 760-3143

### Process Equipment

<u>Equipment</u>	<u>Production Rate</u>	<u>Pollution Control Equipment</u>	<u>Stack #</u>
Paint Booths	--	Filters	3
Carter Day blower system	--	Dust collection bags	--
Bagger Shavings	--	Cyclone separator	--
Finger Jointer	--	None	Fugitive
Veneer Laminating Line	--	None	--
#1 Dry Kiln	250 MBF/load	None	Fugitive
#2 Dry Kiln	200 MBF/load	None	Fugitive

Cousineau also operates parts washers.

#### C. Application Classification

The application for Cousineau does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of current licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 24, 2005). With the fuel limit on Boilers #1 and #2 and Generators #1, #2 and #3, and the operating-hours restriction on the Emergency Generator, the facility is licensed below the major source thresholds and is considered a synthetic minor.

## 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 *Definitions Regulation*, 06-096 CMR 100 (last amended December 24, 2005). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

### **Process Description**

Cousineau produces hardwood lumber in widths of 3” and wider. Logs are received, debarked, and sawn square. When the most clear lumber possible has been obtained from the log, the wood block is sliced into five or six boards depending on width. Smaller edging saws square the sides of outside pieces of the log. Sawdust from the process is exhausted through a cyclone or collected in a vibrator and conveyed to two fuel storage bins from where it is augured to the wood-fired Boiler #1. Larger wood waste pieces are chipped and sold. Cousineau also fires some chipped pallets and wood with a small amount of paint residue.

After the lumber is cut, it is graded and computer stamped, sorted and kiln dried. Once the lumber is finished the drying process it is re-sorted to account for any changes of grade that may take place in the kilns. The ends of some of the lumber are painted and the boards are strapped together for shipment. Other boards are sawn into smaller, higher grade pieces to be used for cabinet stock.

Cousineau operates a Veneer Laminating Line to manufacture gunstocks.

In addition to Boiler #1, Cousineau operates oil-fired Boiler #2, three prime power generators and one emergency generator.

#### **B. Boiler #1**

Cousineau operates Boiler #1 for facility heat and for process heat for the kilns and paint booths. The boiler fires biomass fuel with a maximum capacity of 27 MMBtu/hr. Cousineau may fire sawdust, bark, chipped pallets and waste wood with small amounts of paint residue. Cousineau may also add up to 2,000 gallons/year of used motor oil to their fuel mix by metering it into the auger.

Cousineau shall seek an air license amendment to fire wood fuel derived from construction demolition debris.

Boiler #1 was installed in 1977 and is therefore not subject to the New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for steam generating units greater than 10 MMBtu/hr and manufactured after June 9, 1989. Exhaust from the boiler passes through a fly ash reinjection system before exiting to the atmosphere through stack #1.

A summary of the BPT analysis for Boiler #1 (27.0 MMBtu/hr) is the following:

1. The total fuel use for Boiler #1 shall not exceed 24,000 tons/year of wood waste at 50% moisture, based on a 12-month rolling total. The boiler may also fire up to 2,000 gallons of used motor oil per year.
2. Cousineau shall calculate the fuel use for Boiler #1 using the following formula:

$$\frac{\text{ton wood}}{\text{day}} = \frac{x \text{ gal water}}{\text{day}} \cdot \frac{8.34 \text{ lb steam}}{\text{gal water}} \cdot \frac{0.0003 \text{ ton wood}}{\text{lb steam}}$$

3. *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 (last amended November 3, 1990) regulates PM emission limits. The PM<sub>10</sub> limits are derived from the PM limits.
4. SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC emission limits are based on a previous modeling analysis.
5. The exhaust from Boiler #1 shall vent continuously through the cyclone to control particulate matter.
6. Visible emissions from Boiler #1 shall not exceed 30% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a continuous 3-hour period.

#### C. Boiler #2

Boiler #2 is currently not operational however Cousineau may choose to operate Boiler #2 on low-heat demand days and as a back-up for Boiler #1. Boiler #2 has a maximum heat input capacity of 20 MMBtu/hr and fires #6 fuel oil with a sulfur content to exceed 0.5% by weight.

Boiler #2 was installed in 1969 and is therefore not subject to the New Source Performance Standards (NSPS) 40 CFR Part60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for steam generating units greater than 10 MMBtu/hr and manufactured after June 9, 1989.

A summary of the BPT analysis for Boiler #2 (20.0 MMBtu/hr) is the following:

1. The total fuel use for Boiler #2 shall not exceed 50,000 gallons/year of #6 fuel oil.
2. Cousineau shall not operate Boiler #1 and Boiler #2 concurrently, except for periods of start-up and shut-down.
3. *Low Sulfur Fuel*, 06-096 CMR 106 (last amended June 9, 1999) regulates fuel sulfur content, however in this case a previous BPT analysis determined a more stringent limit of 0.5% by weight was appropriate and shall be used.
4. *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 (last amended November 3, 1990) regulates PM emission limits. The PM<sub>10</sub> limits are derived from the PM limits.
5. NO<sub>x</sub>, CO and VOC emission limits are based on a previous modeling analysis.
6. Visible emissions from Boiler #2 shall not exceed 30% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a continuous 3-hour period.

#### D. Prime Power Generators

Cousineau operates three diesel generators for prime power production. Generators #1 and #2 are each rated at a maximum heat input of 4.0 MMBtu/hr. Generator #3 has a maximum heat input of 2.34 MMBtu/hr. The generators fire diesel fuel with a sulfur content not to exceed 0.05% by weight.

A summary of the BPT analysis for Generators #1 and #2 (365 kW each) and Generator #3 (225 kW) is the following:

1. Total fuel use for Generators #1, #2 and #3 shall not exceed 105,000 gallons/year of diesel fuel.
2. 06-096 CMR 106 regulates fuel sulfur content, however in this case a BPT analysis for SO<sub>2</sub> determined a more stringent limit of 0.05% was appropriate and shall be used.
3. Generator #3 shall be limited to 5,600 hours/year of operation based on a 12-month rolling total. Compliance shall be demonstrated by a written log of all operating hours for Generator #3.
4. 06-096 CMR 103 regulates PM emission limits. The PM<sub>10</sub> limits are derived from the PM limits.
5. NO<sub>x</sub>, CO, and VOC emission limits are based upon guaranteed not-to-exceed data provided by Caterpillar for these engine models.
6. Visible emissions from Generators #1, #2 and #3 shall each not exceed 20% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a continuous 3-hour period.

E. Emergency Generator

Cousineau operates a back-up emergency diesel generator. The Emergency Generator is rated at a maximum heat input of 1.22 MMBtu/hr and fires diesel fuel with a sulfur content not to exceed 0.05% by weight. The Emergency Generator shall have an operating limit of 500 hours per year, on a 12-month rolling total. An emergency shall be defined according to 06-096 CMR 148:

“Emergency” means an electric power outage due to a failure of the electrical grid, on-site disaster, local equipment failure, or public service emergencies such as flood, fire, natural disaster. Emergency shall also mean when the imminent threat of a power outage is likely due to failure of the electrical supply or capacity deficiencies result in a deviation of voltage from the electrical supplier to the premises of three percent (3%) above or five percent (5%) below standard voltage.

A summary of the BPT analysis for the Emergency Generator (125 kW) is the following:

1. The emergency generator shall fire only diesel fuel with a maximum sulfur content not to exceed 0.05% by weight.
2. The emergency generator shall be limited to 500 hours/year of operation based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours.
3. 06-096 CMR 106 regulates fuel sulfur content, however in this case a BPT analysis for SO<sub>2</sub> determined a more stringent limit of 0.05% was appropriate and shall be used.
4. 06-096 CMR 103 regulates PM emission limits. The PM<sub>10</sub> limits are derived from the PM limits.
5. NO<sub>x</sub>, CO, and VOC emission limits are based on AP-42 dated 10/96 and a previous modeling analysis.
6. Visible emissions from the emergency generator shall not exceed 20% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a continuous 3-hour period.

F. Kilns

Cousineau operates two kilns for drying lumber. Kiln #1 has a maximum process rate of 250,000 board feet per load (BF/load). Kiln #2 has a maximum capacity of 200,000 BF/load. Cousineau shall not exceed a yearly throughput in the kilns of 7.5 million board feet per year on a 12-month rolling total. Based on data from a National Council of the Paper Industry for Air and Stream Improvement (NCASI) study dated 6/96 for volatile organic compound emissions from the drying of spruce and fir wood species, at this loading Cousineau shall not exceed

8.5 tons per year VOC from the drying kilns based on a 12-month rolling total. The throughput shall be documented by monthly records of board feet processed.

G. Finger Joining Process

Cousineau operates a finger joining operation in order to reduce waste by reclaiming smaller lengths of wood. Cousineau shall not exceed a limit of 4.6 tons VOC per year from the finger joining operation, based on a 12-month rolling total. Compliance shall be demonstrated by monthly records indicating the amount of glue used and its VOC content.

H. Paint Spray Booths

Cousineau operates two spray paint booths. The facility shall not exceed 4.3 tons per year of VOC from paint sprayed in the spray booths, based on a 12-month rolling total. Compliance shall be documented by monthly records of the amount of paint used and the VOC content of the paint. Cousineau shall maintain particulate filters in the Paint Spray Booths. Visible emissions from the paint booths shall not exceed 5% opacity on a 6-minute block average basis.

I. Veneer Laminating Line

Cousineau operates a Veneer Laminating Line used for the production of wooden gunstocks and includes operation of a radio frequency glue press. The glue used in the laminating process is made up of various materials, some of which contain small amounts of VOCs.

BACT for the Veneer Laminating Line includes:

1. Cousineau shall not exceed an annual VOC emission limit from the veneer laminating line of 10 tons per year on a 12-month rolling total basis. Compliance shall be demonstrated by monthly records indicating the amounts, types and VOC contents of each glue material component used (excluding water).
2. Cousineau shall not exceed a visible emissions limit of 5% opacity on a six (6) month block average basis from the Veneer Laminating Line.

J. Parts Washers

Cousineau shall keep records of the amount and type of solvent added to the parts washers.

K. Process Emissions

Visible emissions from any general process source not otherwise specifically mentioned shall not exceed 20% opacity on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period.

L. Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20 percent opacity, except for no more than five minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual 15-second opacity observations which exceed 20 percent in any one hour.

M. Annual Emissions

Cousineau shall be restricted to the following annual emissions, based on a 12 month rolling total. Emissions are based on the following:

- 24,000 tons of wood fired in Boiler #1;
- 50,000 gallons of #6 fuel oil with a sulfur content of 0.5% by weight fired in Boiler #2;
- 5,600 hours of operation of Generator #3 and 105,000 gallons of diesel fuel with a sulfur content of 0.05% by weight fired in Generators #1, #2 and #3;
- 500 hours of operation of the Emergency Generator; and,
- 7.5 million board feet through the drying kilns.

**Total Licensed Annual Emission for the Facility**

**Tons/year**

(Used to calculate the annual license fee)

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
Boiler #1	50.76	50.76	2.16	18.36	78.84	2.16
Boiler #2	0.75	0.75	1.97	1.88	0.13	0.01
Prime Power Generators	0.86	0.86	0.36	21.73	4.78	0.23
Emergency Generator	0.04	0.04	0.02	1.35	0.29	0.11
Kilns	--	--	--	--	--	8.5
Finger Joining	--	--	--	--	--	4.6
Paint Booth	--	--	--	--	--	4.3
Veneer Laminating Line	--	--	--	--	--	10
<b>Total TPY</b>	<b>52.41</b>	<b>52.41</b>	<b>4.51</b>	<b>43.32</b>	<b>84.04</b>	<b>2.91</b>

Cousineau shall not exceed 9.9 tons/year single hazardous air pollutant (HAP) or 9.9 tons/year of combined HAP on a 12-month rolling total.

### III. AMBIENT AIR QUALITY ANALYSIS

Cousineau 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 renewal.

### 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-103-71-L-R(SM) 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.

### 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 (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. [06-096 CMR 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. [06-096 CMR 115]
- (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 dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353. [06-096 CMR 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]
- (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. [06-096 CMR 115]
- (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. [06-096 CMR 115]
- (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. [06-096 CMR 115]
- (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. [06-096 CMR 115]
- (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:
  - 1. 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; or
  - 2. pursuant to any other requirement of this license to perform stack testing.
- 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.

[06-096 CMR 115]

- (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.

[06-096 CMR 115]

- (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. [06-096 CMR 115]

- (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. [06-096 CMR 115]
- (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. [06-096 CMR 115]

#### SPECIFIC CONDITIONS

(16) **Boiler #1**

- A. Total fuel use for Boiler #1 shall not exceed 24,000 tons per year, based on a 12-month rolling total, of wood waste at 50% moisture. Fuel records, including the amount of fuel fired, shall be maintained on a monthly and a 12-month rolling total basis. Cousineau shall use the following formula to calculate fuel use:

$$\frac{\text{ton wood}}{\text{day}} = \frac{x \text{ gal water}}{\text{day}} \cdot \frac{8.34 \text{ lb steam}}{\text{gal water}} \cdot \frac{0.0003 \text{ ton wood}}{\text{lb steam}}$$

Cousineau may also fire up to 2,000 gallons per year of used motor oil, on a 12-month rolling total. The motor oil shall be metered into the wood fuel auger. Cousineau shall maintain records of the amount of motor oil added to the fuel mix on a monthly and 12-month rolling total. [06-096 CMR 115, BPT]

- B. The fuel mix for the boiler may include sawdust, bark, chipped pallets, waste wood with small amounts of paint residue, and used motor oil. Cousineau shall seek an air license amendment to burn construction debris wood fuel. [06-096 CMR 115, BPT]
- C. The boiler shall exhaust through the fly ash reinjection system at all times it is in operation. [06-096 CMR 115, BPT]
- D. Cousineau shall not operate Boiler #1 and Boiler #2 simultaneously at any time except for periods of start-up and shut-down. [06-096 CMR 115, BPT]

E. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.47	06-096 CMR 103(2)(A)(3)(a)

F. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	12.7	12.7	0.54	4.59	19.71	0.54

G. Visible emissions from Boiler #1 shall not exceed 30% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a continuous 3-hour period. [06-096 CMR 101]

(17) **Boiler #2**

- A. Fuel use for Boiler #2 shall not exceed 50,000 gallons per year on a 12-month rolling total, of #6 fuel oil with a sulfur content not to exceed 0.5% by weight. Compliance shall be demonstrated by fuel records showing the quantity of fuel delivered and the percent sulfur of the fuel. Records of annual fuel use shall be kept on a monthly and a 12-month rolling total basis. [06-096 CMR 115, BPT]
- B. Cousineau shall not operate Boiler #1 and Boiler #2 simultaneously at any time except for periods of start-up and shut-down. [06-096 CMR 115, BPT]
- C. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #2	PM	0.20	06-096 CMR103(2)(A)(1)

D. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #2	4.00	4.00	10.51	10.00	0.67	0.04

E. Visible emissions from Boiler #2 shall not exceed 30% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a continuous 3-hour period. [06-096 CMR 101]

(18) **Prime Power Generators #1, #2 and #3**

- A. Total fuel use for Generators #1, #2 and #3 shall not exceed 105,000 gallons per year of diesel fuel, on a 12-month rolling total and with a sulfur content not to exceed 0.05% by weight. Compliance shall be demonstrated by fuel records showing the quantity of fuel delivered and an indication that the deliveries are on-road diesel. Records of annual fuel use shall be kept on a monthly and a 12-month rolling total basis. [06-096 CMR 115, BPT]
- B. Generator #3 shall be limited to 5,600 hours per year of operation on a 12-month rolling total. Compliance shall be demonstrated by a written log of all operating hours for the generator. Cousineau shall maintain and operate an hour meter on Generator #3. [06-096 CMR 115, BPT]
- C. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Generator #1	PM	0.12	06-096 CMR 103(2)(B)(1)(a)
Generator #2	PM	0.12	06-096 CMR 103(2)(B)(1)(a)
Generator #3	PM	0.12	06-096 CMR 103(2)(B)(1)(a)

D. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #1	0.48	0.48	0.20	10.92	11.44	0.20
Generator #2	0.48	0.48	0.20	10.92	11.44	0.20
Generator #3	0.28	0.28	0.12	7.14	1.05	0.07

E. Visible emissions from Generators #1, #2 and #3 shall each not exceed 20% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a continuous 3-hour period. 06-096 CMR 101]

(19) **Emergency Generator**

- A. Cousineau shall limit the Emergency Generator to 500 hours per year of operation, based on a 12-month rolling total. An hour meter shall be maintained and operated on the Emergency Generator. [06-096 CMR 115, BPT]
- B. The Emergency Generator shall be operated for emergency purposes only or for short periods to exercise the unit and to keep it in operating order. A log shall be maintained and updated each time the generator runs, documenting the date, time, and reason for its operation. [06-096 CMR 115, BPT]
- C. The Emergency Generator shall fire diesel fuel with a sulfur content not to exceed 0.05% by weight. Compliance shall be demonstrated by fuel records showing the quantity of fuel delivered and an indication that the deliveries are on-road diesel. Records of annual fuel use shall be kept on a monthly and a 12-month rolling total basis. [06-096 CMR 115, BPT]
- D. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

<b>Emission Unit</b>	<b>PM (lb/hr)</b>	<b>PM<sub>10</sub> (lb/hr)</b>	<b>SO<sub>2</sub> (lb/hr)</b>	<b>NO<sub>x</sub> (lb/hr)</b>	<b>CO (lb/hr)</b>	<b>VOC (lb/hr)</b>
Emergency Generator	0.15	0.15	0.06	5.38	1.16	0.43

- E. Visible emissions from the Emergency Generator shall not exceed 20% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a continuous 3-hour period. [06-096 CMR 101]

(20) **Kilns**

- A. Cousineau shall not exceed a yearly throughput in the kilns of 7.5 million board feet per year based on a 12-month rolling total. [06-096 CMR 115, BPT]
- B. Cousineau shall keep monthly and 12-month rolling records of board feet processed. [06-096 CMR 115, BPT]

(21) **Finger Joining Process**

Cousineau shall not exceed 4.6 tons VOC per year on a 12-month rolling total from the finger joining operation. Compliance shall be demonstrated by monthly records indicating the amount of glue used and its VOC content. [06-096 CMR 115, BPT]

(22) **Paint Spray Booths**

- A. Cousineau shall not exceed the use of 3,500 gallons of paint per year, based on a 12-month rolling total. Compliance shall be demonstrated by monthly records indicating the amount of paint used and the VOC content of the paint. [06-096 CMR115, BPT]
- B. Cousineau shall maintain particulate filters in the spray booths. [06-096 CMR 115, BPT]
- C. Visible emissions from the Paint Spray Booths shall not exceed 5% opacity on a 6-minute block average basis. [06-096 CMR 101]

(23) **Process HAP Emissions**

Cousineau shall not exceed a facility limit of 9.9 tons per year of any single HAP or 9.9 tons per year of total combined HAPs, on a 12-month rolling total basis. Cousineau shall keep records of the amounts of HAP containing material used and the HAP content of the material on a monthly and 12-month rolling total. [06-096 CMR 115, BPT]

(24) **Parts Washer**

Parts washers at Cousineau are subject to 06-096 CMR 130.

- A. Cousineau shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]
- B. The following are exempt from the requirements of Chapter 130 [06-096 CMR 130]:
  1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg (.039 inHg), or less, at 20° C (68° F);
  2. Wipe cleaning; and,
  3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
- C. The following standards apply to remote reservoir cold cleaning machines that are applicable sources under 06-096 CMR 130.
  1. Cousineau shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR130]:
    - (i) Waste solvent shall be collected and stored in closed containers.
    - (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.

- (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine atomized or shower type spray) at a pressure that does not exceed 68.9 kPa (10 psig). Flushing shall be performed only within the freeboard area of the cold cleaning machine.
  - (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute (130 feet per minute) when the cover is open.
  - (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.
  - (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
  - (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material shall be immediately stored in covered containers.
  - (viii) Work area fans shall not blow across the opening of the degreaser unit.
  - (ix) The solvent level shall not exceed the fill line.
2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130, BPT]

(25) **General Process Sources**

Visible emissions from any general process source not otherwise specifically mentioned shall not exceed 20% opacity on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period. [06-096 CMR 101]

(26) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20 percent opacity, except for no more than five minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual 15-second opacity observations which exceed 20 percent in any one hour. [06-096 CMR 101]

(27) **Malfunctions and Breakdowns**

Cousineau shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 MRSA §605).

(28) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (last amended July 6, 2004), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of a written emission statement containing the information required in 06-096 CMR 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator  
Maine DEP  
Bureau of Air Quality  
17 State House Station  
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted as specified in 06-096 CMR 137.

DONE AND DATED IN AUGUSTA, MAINE THIS 5<sup>th</sup> DAY OF February 2009.  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Little  
DAVID P. LITTELL, COMMISSIONER

**The term of this license shall be five (5) years from the signature date above.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: December 5, 2005

Date of application acceptance: December 8, 2005

Date filed with the Board of Environmental Protection:

This Order prepared by N. Lynn Cornfield, Bureau of Air Quality.

