



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

JAMES P. BROOKS
ACTING COMMISSIONER

**SB Acquisitions LLC
Oxford County
Greenwood, Maine
A-15-71-J-R/M (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Renewal/Minor Revision**

After review of the air emissions license renewal/minor revision 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

SB Acquisitions LLC (formerly Saunders Brothers) has applied to renew their Air Emission License permitting the operation of emission sources associated with their wood processing facility located in Greenwood, Maine. In addition, SB Acquisitions LLC (SBA) has requested permission to relocate an emergency diesel-fired generator from Saunders Brothers' Westbrook facility to the Locke Mills facility as well as a fabric filter to be used to collect the fines from their wood sanding operations.

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, % moisture or % sulfur</u>	<u>Stack #</u>
Boiler #1	6	1,154 lb/hr*	wood, typically ≤40% moisture content	1
Boiler #2	6	1,154 lb/hr*	wood, typically ≤40% moisture content	1
Diesel Fire Pump	0.9**	6.7 gal/hr	diesel	Pump house stack
Emergency Diesel Generator	2.5**	18 gal/hr	diesel	2

* based on wood @ 40% moisture content, by weight

** based on diesel fuel @ 138,000 Btu/gal

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

BANGOR
106 HOGAN ROAD, SUITE 6
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 04679-2094
(207) 764-0477 FAX: (207) 760-3143

Process Equipment

<u>Equipment</u>	<u>Production Rate</u>	<u>Pollution Control Equipment</u>
Kiln #1	39,000 Board Feet (BF)/batch	none
Kiln #2	39,000 BF/batch	none
Kiln #3	10,000 BF/batch	none
Ozmose dryer	N/A	none
Coating Operations:		
Spray booths	10,700 pieces/hr	paper filters
Tumbling barrels	1,900 pieces/hr	none
Dip coating processes	N/A	none
Wood turning operations	4,000 pieces/hr	cyclones
Wood sanding operations	N/A	fabric filter

C. Application Classification

This air emission license covers the renewal of current licensed emission units as well as approval to relocate an emergency diesel-fired generator and a fabric filter from Saunders Brothers' Westbrook facility. The addition of the emergency diesel generator and fabric filter for the sanding operations will increase emissions by less than 4 tons/year for each single pollutant and less than 8 tons/year for all pollutants combined. Therefore, these modifications are determined to be minor modifications and have been processed as such in combination with the renewal of the air emission license in accordance with *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 24, 2005).

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.

B. Boilers #1 and #2

Boilers #1 and #2 are both wood-fired boilers, each with a maximum design heat input capacity of 6 MMBtu/hr.

NSPS requirements

Both of these boilers were installed in 1950 and have heat input capacities of less than 10 MMBtu/hr, and are therefore not subject to the New Source Performance Standards (NSPS) Subpart Dc for steam generating units greater than 10 MMBtu/hr manufactured after June 9, 1989.

A summary of the BPT determination for Boilers #1 and #2 is the following:

1. The total fuel use for Boilers #1 and #2 shall not exceed the equivalent of 5,055 tons/year of wood (based on an average moisture content of 40% by weight), on a 12-month rolling total basis. Fuel use records shall be maintained on a monthly basis, in addition to the 12-month rolling total basis.
2. PM and PM₁₀ emission rates are based upon *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 (as amended). The licensed allowable PM emission rate for each boiler is 0.68 lb/MMBtu, based on a maximum heat input capacity of 6 MMBtu/hr.
3. SO₂, NO_x, CO, and VOC emission limits are based upon AP-42 data dated 9/03.
4. Visible emissions from the combined boiler stack (stack #1) shall not exceed 30% opacity on a 6-minute block average, except for no more than three, 6-minute block averages in a 3-hour block period.

The Boilers are subject to the requirements of the *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ). The units are each rated under 10 MMBtu/hr and are thus not subject to PM, CO, or Mercury emission limits from 40 CFR Part 63 Subpart JJJJJ. The boilers are subject to the following:

For informational purposes, a summary of the applicable federal 40 CFR Part 63 Subpart JJJJJ requirements are listed below. The Maine Department of Environmental Protection has not taken delegation of this area source MACT (Maximum Achievable Control Technology) rule promulgated by EPA, however SBA is still subject to the requirements.

- An initial notification must be submitted to EPA no later than September 17, 2011. [40 CFR Part 63.11225(a)(2)]

- A boiler tune-up program shall be implemented to include the tune-up of the boilers by March 21, 2012. [40 CFR Part 63.11196)(a)(1)]
- A Notification of Compliance Status shall be submitted to EPA no later than 120 days after conducting the initial boiler tune-up. [40 CFR Part 63.11225(a)(4)] The Notification of Compliance Status form developed by EPA may be used to submit the required information. This notice can be found near the bottom of the page on the following website: <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.
- After the initial tune-up and initial compliance report has been submitted, the facility shall implement a biennial boiler tune-up program and submit biennial compliance reports. The following are requirements of the boiler tune-up program:
 - Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up. [40 CFR Part 63.11223(a)]
 - Each biennial tune-up shall include the following, as applicable:
 - Inspection of the burner, cleaning/replacing any component of the burner, as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; however, the burner must be inspected at least once every 36 months. [40 CFR Part 63.11223(b)(1)]
 - Inspection of the flame pattern, and adjustment of the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
 - Inspection of the system controlling the air-to-fuel ratio, to ensure proper calibration and that it is functioning properly. [40 CFR Part 63.11223(b)(3)]
 - Optimization of total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
 - Measurement of concentration in the effluent stream of CO in parts per million (ppm), by volume, and oxygen in volume percent, before and after adjustments are made. [40 CFR Part 63.11223(b)(5)]
 - If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of start-up. [40 CFR Part 63.11223(b)(7)]
- Records shall be maintained consistent with the requirements of 40 CFR Part 63 Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]: copies of compliance reports; identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation.

C. Emergency Engines

SBA Operates a Diesel Fire Pump and an Emergency Generator rated at 0.9 and 2.5 MMBtu/hr respectively. Both units were manufactured prior to 2006 and are thus considered to be existing stationary compression ignition emergency engines. They are therefore not subject to either the NSPS 40 CFR Part 60 Subpart IIII, or the NESHAP 40 CFR Part 63 Subpart ZZZZ.

Back-up generators are only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. Back-up generators are not to be used for prime power or peak shaving when reliable offsite power is available or for any demand response program.

A summary of the BPT determination for the diesel fire pump is the following:

1. Each emergency engine shall be operated no more than 500 hr/yr on a 12-month rolling total basis. Hour meters shall be operated and a written log be kept for compliance purposes.
2. *Low Sulfur Fuel*, 06-096 CMR 106 (as amended) regulates fuel sulfur content, however, the use of diesel fuel with a sulfur content not to exceed 15 ppm is more stringent and shall be considered BPT.
3. A PM emission limit of 0.12 lb/MMBtu shall be considered BPT. The PM₁₀ emission limit is derived from the PM emission limit.
4. NO_x, CO, and VOC emission limits are based upon AP-42 data for diesel industrial engines dated 10/96.
5. Visible emissions from each emergency engine shall not exceed 20% opacity on a 6-minute block average, except for no more than two (2), six (6) minute block averages in a 3-hour period.

D. Drying Kilns (#1, #2, & #3)

Saunders Brothers currently operates only one wood drying kiln (Kiln #3); Kilns #1 and #2, although not currently operating, are being kept on the license for possible use in the future. Kilns #1 and #2 are each capable of drying 39,000 BF/batch. Kiln #3 is capable of drying 10,000 BF/batch. Kiln #3 is currently used to dry soft maple, beech, yellow birch, white birch and hard maple woods, all of which are hardwood species. Due to the lack of existing data for emissions from kilns drying hardwood species, the lowest VOC emission factor determined for drying softwood (0.12 lb/1,000 BF for cedar) is used to calculate VOC emissions from Kiln #3.

E. Ozmose Dryer

The Ozmose Dryer was relocated to the Locke Mills facility from Saunders Brother's Westbrook, Maine site. The dryer is utilized to tumble dry pressure treated dowels. The dowels are treated with chromated copper arsenate at Maine Wood Treaters and then brought to SBA to be dried in the Ozmose Dryer. The drying of wood treated with chromated copper arsenate results in very small emissions of chromium and copper compounds. Based on the amount of treated wood to be dried at SBA and the very small resultant emissions from the treated wood drying process, the Department has concluded that the Ozmose dryer is an insignificant source of emissions.

F. Coating Operations

SBA operates various coating operations including tumbling barrels, spray booths, and dip type coating processes. Some of the coating equipment currently used at the Locke Mills facility was relocated from Saunders Brothers' Westbrook, Maine facility (addressed in air emission license amendment A-15-71-G-A) in 2004.

The dip type coating process is a process in which the wood products are submerged into tanks containing the coatings and removed slowly, followed by air drying. The fumes from these processes are vented to atmosphere through coating room vents.

Pollutants associated with the coating operations can include (PM), (PM₁₀), volatile organic compounds (VOC) and Hazardous Air Pollutants (HAPs). BPT for VOCs emitted from the coating processes located at SBA shall include good house keeping practices to minimize fugitive VOC emissions. Good housekeeping practices include covering coating storage containers and the dip coating tanks when these containers are not in use, cleaning up excess and/or spilt materials, and proper disposal of contaminated working equipment (i.e., gloves, coveralls, tools, etc.). BPT also includes monthly and 12-month rolling total record keeping as outlined in Section (H) of the Finding of Facts of this license.

SBA, as a wood manufacturing facility that performs surface coating could be subject to *Surface Coating Facilities*, 06-096 CMR 129 (last amended March 3, 1998), however, Saunders Brothers has accepted federally enforceable restrictions on HAP emissions of 9.9 tons/yr of any single HAP and 24.9 tons/yr of all combined HAPs. Therefore, SBA is not considered a "Major Source" of HAPs as defined in 40 CFR Part 63, Subpart A, Section 63.2, and as such is not subject to 06-096 CMR 129 or 40 CFR Part 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations). Compliance is based on monthly and 12-month rolling total record keeping indicating the amount of product used and percent HAP by weight in each product.

BPT for the control of particulate matter emissions from the spray booths was determined to be the installation, operation, and maintenance of filter systems.

BPT shall include a visible emissions limitation from each coating operation vent of no more than 10% opacity on a 6-minute block average basis.

G. VOC and HAP Emission Records

VOC emissions from the use of coatings and from the kiln drying of wood shall be documented by monthly and twelve-month rolling total record keeping. The VOC records shall include the amount of coating used on site, material safety data sheets (MSDS) for each type of coating used indicating the VOC content of the coatings, the amount of wood dried in the kilns and the total facility VOC emissions (including calculations). In calculating VOC emissions from coatings, it is assumed that all volatile components of the coatings are released to the atmosphere. The total facility VOC emissions shall not exceed 39.9 tons per year based on a 12 month rolling total basis.

HAP emissions shall be documented by monthly and twelve-month rolling total record keeping including the amount of coatings used, the percent HAP content of each product and the total facility HAP emissions. Total facility HAP emissions shall be limited to 9.9 tons per year of any single HAP and 24.9 tons per year of all combined HAPs.

H. General Process Sources

General process sources not specifically addressed above include, but are not limited to wood turning operations and wood sanding operations.

PM emissions from wood turning equipment operated at the facility are captured and vented to cyclones for control purposes. BPT includes continuous operation of the cyclones at all times when the wood turning equipment being controlled by them is in operation. Visible emissions from the cyclone discharges shall not exceed 10% opacity on a 6-minute block average basis.

PM emissions from wood sanding equipment operated at the facility are captured and vented to a fabric filter for control purposes. BPT includes continuous operation of the fabric filter at all times when the wood sanding equipment being controlled by them is in operation. Visible emissions from the fabric filter discharge shall not exceed 10% opacity on a 6-minute block average basis.

Visible emissions from any other general process source 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.

I. Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity, except for no more than 5-minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual 15-second opacity observations which exceed 20% in any 1-hour.

J. Annual Emissions

SBA shall be restricted to the following annual emissions, based on a 12-month rolling total:

Total Licensed Annual Emissions for the Facility

Tons/year

(*used to calculate the annual license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	**HAPs (single)	**HAPs (combined)
Boilers #1 and #2	18.6	18.6	0.7	6.0	16.4	0.5	--	--
Diesel Fire Pump	0.03	0.03	0.01	1.0	0.2	0.1	--	--
Emergency Diesel Generator	0.08	0.08	0.01	2.8	0.6	0.2	--	--
Drying Kilns	--	--	--	--	--	Included in Total	--	--
Coating Operations	--	--	--	--	--	Included in Total	Included in Total	Included in Total
Total TPY	18.7	18.7	0.7	9.8	17.2	39.9	9.9	24.9

* CO and HAP emissions are not included in determining the annual license fee

** HAPs are identified by the EPA in regulations pursuant to Section 112(b) of the Clean Air Act (CAA)

III. AMBIENT AIR QUALITY ANALYSIS

According to 06-096 CMR 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Modeling and monitoring are not required for a renewal if the total emissions of any pollutant released do not exceed the following:

<u>Pollutant</u>	<u>Tons/Year</u>
PM	25
PM ₁₀	25
SO ₂	50
NO _x	100
CO	250

Based on the above total licensed annual emissions for the facility, SBA is below the emissions level required for modeling and monitoring.

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-15-71-J-R/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.

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) **Boilers #1 and #2**
- A. Total fuel use for Boilers #1 and #2 shall not exceed the equivalent of 5,055 tons/yr of wood (based on an average moisture content of 40% by weight), based on a 12-month rolling total. Fuel use records shall be maintained on a monthly basis, in addition to a 12-month rolling total basis. [06-096 CMR 115, BPT]
- B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.68	06-096 CMR 103(2)(A)(3)(a)
Boiler #2	PM	0.68	06-096 CMR 103(2)(A)(3)(a)

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

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	4.2	4.2	0.16	1.4	3.7	0.11
Boiler #2	4.2	4.2	0.16	1.4	3.7	0.11

D. Visible emissions from the combined boiler stack (#1) shall not exceed 30% opacity on a 6-minute block average, except for no more than three, 6-minute block averages in a 3-hour block period. [06-096 CMR 101]

(17) **Emergency Engines**

A. The diesel fire pump and emergency diesel generator shall each be limited to 500 hr/yr of operation (based on a 12-month rolling total). An hour meter shall be installed, maintained, and operated on the diesel fire pump and on the emergency diesel generator. [06-096 CMR 115, BPT]

B. Each emergency engine shall only be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. The generators shall not to be used for prime power when reliable offsite power is available or for any demand response program. A log shall be maintained documenting the date, time, and reason for operation. [06-096 CMR 115, BPT]

C. The diesel fire pump and emergency diesel generator shall fire diesel fuel with a sulfur content not to exceed 15 ppm. Compliance shall be based on fuel records from the supplier showing the quantity of fuel delivered and the type of fuel.

[06-096 CMR 115, BPT]

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

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Diesel Fire Pump	0.11	0.11	0.01	3.97	0.86	0.32
Emergency Diesel Generator	0.30	0.30	0.01	11.03	2.38	0.88

E. Visible emissions from either the diesel fire pump or the emergency diesel generator shall not exceed 20% opacity on a 6-minute block average basis, except for no more than two, 6-minute block averages in a 3-hour period.

[06-096 CMR 101]

(18) **Drying Kilns (#1, #2, & #3)**

SBA shall maintain a record of kiln production from each of the drying kilns, which shall include the amount of wood dried. An emission factor of 0.12 lb VOC/1000 BF shall be used to calculate the VOC emissions from the kilns. The kiln production records shall be maintained on a monthly and 12-month rolling total basis and emissions of VOCs shall be included in the facility's total VOC emission record as required by Condition (20) of this license. [06-096 CMR 115, BPT]

(19) **Coating Operations**

- A. SBA shall maintain good housekeeping practices to minimize fugitive VOC and HAP emissions from their coating operations. Good housekeeping practices shall include covering coating storage containers and dip type coating tanks when these containers are not in use, cleaning up excess and/or spilt material, and proper disposal of contaminated working equipment (gloves, coveralls, tools etc).
- B. SBA shall maintain their spray booths, including spray booth blowers and filters, in good working order and any excess or spilt coating materials shall be cleaned up immediately. A record shall be kept in regards to spray booth maintenance, failures, and corrective actions.
- C. SBA shall maintain their tumbling barrels and dip type coating process equipment in good working order and any excess or spilt coating materials shall be cleaned up immediately. A record shall be kept in regards to tumbling barrel and dip type coating process equipment maintenance, failures, and corrective actions.
- D. Visible emissions from each coating operation vent shall not exceed 10% opacity on a 6-minute block average basis.
[06-096 CMR 115, BPT]

(20) **VOC and HAP Record Keeping**

- A. SBA shall maintain a record of VOC emissions from the use of coatings and from the kiln drying of wood. The VOC records shall include the amounts of each coating used on site, material safety data sheets (MSDS) for each type of coating used indicating the VOC content of the coatings, the amounts of wood dried in the kilns, and the total facility VOC emissions (including calculations). Combined annual VOC emissions from the coating and kiln drying operations shall not exceed 39.1 tons/year. Combined annual VOC emissions from the facility shall not exceed 39.9 tons/year. The VOC emission records shall be maintained on a monthly and 12-month rolling total basis. [06-096 CMR 115, BPT]
- B. SBA shall maintain a record of HAP emissions from the use of coatings. The HAP records shall include the amounts of each coating used on site, the percent HAP content of each type of coating, and the total HAP emissions (including calculations). Combined annual HAP emissions shall not exceed

9.9 tons/year. The HAP emission records shall be maintained on a monthly and 12-month rolling total basis. [06-096 CMR 115, BPT]

(21) **General Process Sources**

- A. Visible emissions from the discharges of the cyclones controlling PM emissions from the wood turning equipment operated at the facility shall not exceed 10% opacity on a 6-minute block average basis.
[06-096 CMR 115, BPT]
- B. Visible emissions from the discharge of the fabric filter controlling PM emissions from the wood sanding equipment operated at the facility shall not exceed 10% opacity on a 6-minute block average basis.
[06-096 CMR 115, BPT]
- C. Visible emissions from any general process source not otherwise addressed 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]

(22) **Fugitive Emissions**

Visible emissions from each fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity, except for no more than 5-minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual 15-second opacity observations which exceed 20% in any 1-hour. [06-096 CMR 101]

(23) **Malfunction/Breakdown Notification**

SBA 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.
[Title 38 MRSA §605]

(24) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department; or
- 2) A written emission statement containing the information required in 06-096 CMR 137.

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

DONE AND DATED IN AUGUSTA, MAINE THIS 25th DAY OF May 2011.
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie Brooks
JAMES P. BROOKS, ACTING 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: May 15, 2006

Date of application acceptance: June 6, 2006

Date filed with the Board of Environmental Protection: _____

This Order prepared by Jonathan Voisine, Bureau of Air Quality.

