



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
ACTING COMMISSIONER

**Wood Products Complex Andover, LLC
Oxford County
Andover, Maine
A-317-71-K-R/T**

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

After review of the air emissions license renewal and transfer applications, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A. §344 and §590 and 06-096 CMR 2, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Wood Products Complex Andover, LLC (Wood Products Complex Andover) has requested both a transfer and renewal for the equipment at its Andover, Maine site, including two boilers, a generator, and kilns. The facility had been temporarily shut down and some of the process equipment has been removed, however the facility began operations again in the spring of 2011.

Wood Products Complex Andover requested the transfer of Air Emission License A-317-71-I-R, amendment A-317-71-J-M, and the most recent renewal application from Andover Division of Ethan Allen Operations, Inc. to Wood Products Complex Andover, LLC through a submittal to the Bureau of Air Quality dated September 28, 2010 and a subsequent letter with documentation dated January 17, 2011.

The renewal includes removing process emissions from the license, allowing the #2 fuel oil fired to meet the ASTM (American Society of Testing and Materials) D396 requirements (maximum 0.5% sulfur), and the firing of 0.0015% sulfur (15 ppm) in the emergency diesel generator.

This air emission license incorporates both the transfer and the air emission license renewal applications. The equipment addressed in this license is located 4 Wentzell Road, Andover, Maine.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
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BANGOR
106 HOGAN ROAD, SUITE 6
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(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
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PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
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B. Transfer Information

1. *Title, Right, or Interest*

Wood Products Complex Andover submitted copies of a quitclaim deed with covenant transferring ownership of the facility from Ethan Allen Reality LLC (originally from Ethan Allen Retail, Inc. formerly known as Ethan Allen Inc. formerly known as Andover Wood Products, Inc) to Wood Products Complex Andover signed January 19, 2010. The parties have provided sufficient evidence of title, right, or interest in the facility to allow the transfer of the facility's licenses.

2. *Financial Capacity and Intent*

Wood Products Complex Andover states that they possess the financial capacity to operate the facility in compliance with its air emission license.

3. *Technical Capacity and Intent*

Wood Products Complex Andover states that they possess the technical capacity to operate the facility in compliance with its air emission license. At least one former employee of Ethan Allen is on payroll with a current boiler license.

4. *Full Name and Address*

The full name and address of the new owner is:
Wood Products Complex Andover, LLC
Steven J. Swasey, owner
PO Box 1
Andover, ME 04216

5. *Certification*

Wood Products Complex Andover certifies that there will be no increase in air emissions beyond that provided for in the air emission license, either in quantity or type.

C. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type</u>	<u>Stack #</u>
Boiler 2 – Cleaver Brooks	14.6	97 gal/hr	#2 oil, ASTM D396	2
Boiler 3 – Dillon	12.0	0.74 tons/hr (based on 8100 Btu/lb wood)	Wood	3

Generator

<u>Equipment</u>	<u>Firing Rate</u>	<u>Max. Input Capacity</u>	<u>Power Output</u>	<u>Fuel Type, % sulfur</u>
Generator 1	10 gal/hr	1.4 MMBtu/hr	170 kW	Diesel, 0.0015% sulfur

Process Equipment

<u>Equipment</u>
4 Drying Kilns

There are a number of storage tanks on-site and a 20 kW generator (propane-fired, 0.27 MMBtu/hr, Generac Guardian Model 005525-1) which are considered insignificant activities based on the size thresholds in *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115, Appendix B (as amended). These are mentioned for informational purposes only. The generator shall meet applicable federal requirements.

The previous license included gluing operations which are no longer at the facility. The contents of the rough mill and the saw mill have been removed, as well as four of the original eight drying kilns.

D. Application Classification

The application for Wood Products Complex Andover does not include the installation of new or modified equipment. Therefore, the license is considered to be a renewal of current licensed emission units with a transfer and has been processed 06-096 CMR 115 (as amended). The facility is a natural minor: emissions are below major source thresholds without the license fuel and operational limits.

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 (as amended). 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

Wood Products Complex Andover is made up of various buildings that previously housed a lumber and furniture manufacturing facility. The operations currently occurring at the facility include debarking, firewood cutting and storage, and lumber drying. The rough mill and saw mill equipment has been removed, as well as the gluing operations.

The debarking unit is located in a building located in the rear of the yard. The four kilns (reduced from eight kilns previously licensed) are in one area. The main building is now being used for general dry storage and maintenance.

The four kilns dry the lumber brought in from a separate company (currently Kennebec Lumber). The kilns are heated using process steam from the wood-fired boiler. Wood Products Complex Andover is considering using the kilns to also dry firewood in the future.

The fuel for the wood boiler is purchased and stored under cover. The fuel metering system has a cyclone, with fuel being fed into the boiler by a screw auger. The previous facility-wide fuel transport system which brought wood waste from the process areas (sawmill, cutting, planers, etc) to the boiler fuel storage area is no longer in use.

The fuel oil boiler is not in operation at this time, but may be brought on-line at a later date.

B. Boiler 2 – Cleaver Brooks

Boiler 2 is a Cleaver Brooks fire tube package boiler with a maximum input rated capacity of 14.6 MMBtu/hr (97 gal/hr). The unit was previously licensed with 0.3% sulfur #2 fuel oil. In order to facilitate recordkeeping and to be consistent with similar units at other facilities, Wood Products Complex Andover may fire fuel oil certified as ASTM D396 #2 fuel oil (with a maximum sulfur content of 0.5% by weight). The operational parameters monitored on the boiler include breach temperature, steam pressure, air pressure, and fuel pressure. Boiler 2 exhausts through its own stack.

NSPS requirements

The boiler was manufactured in 1969, and is therefore not subject to New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* which contains federal requirements for units greater than 10 MMBtu/hr manufactured after June 9, 1989.

The BPT emission limits for Boiler 2 were based on the following:

- PM/PM₁₀ – 0.2 lb/MMBtu based on 06-096 CMR 103; 2.92 lb/hr
- SO₂ –based on firing ASTM D396 #2 fuel oil (0.5% sulfur); 0.5036 lb/MMBtu; 7.35 lb/hr
- NO_x – 0.5 lb/MMBtu based on previous licenses; 7.30 lb/hr
- CO – 5 lb/1000 gal from AP-42, Table 1.3-1, dated 5/10; 0.49 lb/hr
- VOC – 0.34 lb/1000 gal from AP-42, Table 1.3-3, dated 5/10; 0.02 lb/hr
- Opacity – Visible emissions from Boiler 2 shall not exceed 20% opacity on a 6 minute block average, except for no more than one (1) six (6) minute block average in a 3 hour period, based on 06-096 CMR 101.

The total fuel use for Boiler 2 shall not exceed 300,000 gal/year of #2 fuel oil based on a 12 month rolling total. Fuel use records shall be maintained on a monthly and 12 month rolling total basis. Fuel documentation shall also include the type of fuel used.

Until December 31, 2015, the fuel oil fired in Boiler 2 shall be ASTM D396 compliant #2 fuel oil (maximum sulfur content of 0.5% by weight). Per 38 MRSA §603-A(2)(A)(3), beginning January 1, 2016, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm), and beginning January 1, 2018, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm).

C. Boiler 3 – Dillon

Boiler 3 is a Dillon boiler rated at 12.0 MMBtu/hr firing wood (50% moisture) and was manufactured in 1924. It was installed at the facility in 1992 and was upgraded with a new Dutch oven, underfire air, overfire air and fuel feed system. The operational parameters monitored on the boiler include O₂, breach temperature, furnace vacuum, furnace temperature, and combustion air temperature. The operational controls can be electronically accessed and recorded. The majority of wood burned in the boiler is kiln dried sawdust and shavings with a mixture of green sawdust. For calculation purposes, a moisture content of approximately 10% (8100 Btu/lb) was used. Boiler 3 exhausts through a Breslove Separator (regenerative fly ash separator) and then up the stack, which is 48 feet measured from the top of the elevated separator. The fly ash collected by the separator drops into two drums for disposal.

Boiler 3 was manufactured prior to 1989 and is therefore not subject to 40 CFR Part 60, Subpart Dc which contains federal requirements for steam generating units greater than 10 MMBtu/hr manufactured after June 9, 1989.

The BPT emission limits for Boiler 3 were based on the following:

- PM/PM₁₀ – 0.3 lb/MMBtu based on Chapter 103; 3.60 lb/hr
- SO₂ – use of wood, 0.025 lb/MMBtu from AP-42 Table 1.6-2 dated 9/03; 0.3 lb/hr
- NO_x – 0.49 lb/MMBtu from AP-42 Table 1.6-2 for dry wood dated 9/03; 5.88 lb/hr
- CO - good combustion, 0.6 lb/MMBtu from AP-42 Table 1.6-2 dated 9/03; 7.20 lb/hr
- VOC - good combustion, 0.017 lb/MMBtu from AP-42 Table 1.6-2 dated 9/03; 0.20 lb/hr
- Opacity - Visible emissions from Boiler 3 shall not exceed 30% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a 3-hour period, based on 06-096 CMR 101.

Fuel use records shall be maintained on a monthly and 12 month rolling total basis.

D. 40 CFR Part 63 Subpart JJJJJ

Boilers 2 and 3 are subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ). The units are considered existing oil and biomass boilers.

For informational purposes, a summary of the current applicable federal 40 CFR Part 63 Subpart JJJJJ requirements is listed below. At this time, the Maine Department of Environmental Protection has not taken delegation of this area source MACT (Maximum Achievable Control Technology) rule promulgated by EPA, however Wood Products Complex Andover is still subject to the requirements. Notification forms and additional rule information can be found on the following website: <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

1. Compliance Dates, Notifications, and Work Practice Requirements

a. Initial Notification of Compliance

An Initial Notification shall be submitted to EPA no later than September 17, 2011 for each boiler. [40 CFR Part 63.11225(a)(2)]

b. Boiler Tune-Up Program – Initial and Biennial

- i. 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)]
- ii. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
 - (a) As applicable, inspect the burner, and clean or replace 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)]
 - (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
 - (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. [40 CFR Part 63.11223(b)(3)]
 - (d) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
 - (e) Measure the 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)]
 - (f) 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)]
- iii. 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) and 40 CFR Part 63.11214(b)]
- iv. The facility shall implement a biennial boiler tune-up program after the initial tune-up and initial compliance report has been submitted.

- (a) Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up. [40 CFR Part 63.11223(a)]
- (b) The biennial report shall be maintained onsite and submitted to EPA, if requested. The report shall contain the concentration of CO in the effluent stream (ppmv) and oxygen in volume percent, measure before and after the boiler tune-up, a description of any corrective actions taken as part of the tune-up of the boiler, and the type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler. [40 CFR Part 63.11223(b)(6)] The biennial compliance report shall also include the company name and address; a compliance statement signed by a responsible official certifying truth, accuracy, and completeness; and a description of any deviations and corrective actions. [40 CFR Part 63.11225(b)]

c. Energy Assessment

- i. A one-time energy assessment shall be performed by a qualified energy assessor on the boilers by March 21, 2014. [40 CFR Part 63.11196(a)(3)]
- ii. The energy assessment shall include a visual inspection of the boiler system; an evaluation of operating characteristics of energy using systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major systems consuming energy from affected boiler(s); a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments. [40 CFR Part 63, Table 2(4)]
- iii. A Notification of Compliance Status shall be submitted to EPA no later than 120 days after conducting the energy assessment. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(c)]

2. Recordkeeping

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 notifications and reports with supporting compliance documentation; 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. Records shall be in a form suitable and readily available for expeditious review.

E. Emergency Generator

The emergency generator is rated at 170 kW (1.4 MMBtu/hr), fires 0.05% sulfur diesel oil, and is limited to 500 hours/year based on a 12 month rolling total.

1. BPT Findings

The BPT emission limits for the generator are based on the following:

PM/PM₁₀ — 0.31 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96; 0.43 lb/hr

SO₂ — use of 0.05% sulfur fuel, 0.5 lb/MMBtu; 0.07 lb/hr

NO_x — 4.4 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96; 6.17 lb/hr

CO — 0.95 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96; 1.33 lb/hr

VOC — 0.36 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96; 0.50 lb/hr

Opacity - Visible emissions from the emergency generator shall not exceed 30% opacity on a 6 minute block average basis, except for no more than 2 six minute block averages in a 3-hour period, based on 06-096 CMR 101.

The emergency generator shall be limited to 500 hours of operation a year, based on a 12 month rolling total. Wood Products Complex Andover shall keep records of the hours of operation for the unit.

2. 40 CFR Part 63, Subpart ZZZZ

The federal regulation 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines* is applicable to the emergency generator. The unit is considered an existing, emergency stationary reciprocating internal combustion engine at an area HAP source and is not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo specifically does not exempt this unit from the federal requirements.

Emergency Definition:

Emergency stationary reciprocating internal combustion engine (RICE) is defined in 40 CFR Part 63, Subpart ZZZZ as any stationary internal combustion engine whose operation is limited to emergency situations and required testing and maintenance. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility

(or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc. Stationary RICE used for peak shaving are not considered emergency stationary RICE. Stationary RICE used to supply power to an electric grid or that supply non-emergency power as part of a financial arrangement with another entity are not considered to be emergency engines, except as permitted under §63.6640(f).

§63.6640(f) limits maintenance checks and readiness testing of the units to 100 hours per year. Emergency stationary RICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph, as long as the power provided by the financial arrangement is limited to emergency power.

40 CFR Part 63, Subpart ZZZZ Requirements:

	Compliance Date	Operating Limitations* (40 CFR §63.6603(a) and Table 2(d))
Emergency Generator (compression ignition diesel unit)	No later than May 3, 2013	<ul style="list-style-type: none"> - Change oil and filter every 500 hours of operation or annually, whichever comes first; - Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first; - Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary

* Note: Due to the 500 hour operation limit on each generator, the inspections and oil/filter changes shall be performed annually to meet the requirements of 40 CFR Part 63, Subpart ZZZZ.

The generator shall be operated and maintained according to the manufacturer's emission-related written instructions or Wood Products Complex Andover shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]

A non-resettable hour meter shall be installed and operated on the generator. [40 CFR §63.6625(f)]

The generator shall be limited to 100 hours/year for maintenance and testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving or generating income or a financial arrangement with another entity). A maximum of 15 hours per year (of the 50 hours/year) may be used as part of a demand response program. [40 CFR §63.6640(f)(1)]

Wood Products Complex Andover shall keep records that include maintenance conducted on the generators and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency. If the generator is used for demand response operation, Wood Products Complex Andover must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [40 CFR §63.6655(e) and (f)]

F. Material Handling and Storage

The wood fuel transport system from the boiler storage to the wood boiler consists of enclosed conveyors and a cyclone. Routine maintenance shall include inspections so that any leakage is quickly repaired and spilled wood waste is collected to prevent wind entrainment.

Visible emissions from the fuel feed cyclone and the Breslove Separator cyclone shall each not exceed 20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period, based on 06-096 CMR 101.

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

G. Kilns

Wood Products Complex Andover has four (4) wood drying kilns (four additional kilns previously located at the facility have been removed). Processing times range from approximately 35 to 40 days depending on the species of wood. Each kiln has a capacity of 60,000 board feet, for a total of 240,000 board feet. Using an emission factor for spruce/fir kiln drying of 1.283 lb VOC/MBF (1000 board feet) based on testing performed at the University of Maine and an average of one month for a full kiln's drying time, VOC emissions from the four kilns are currently estimated to be 2.0 ton/year.

Wood Products Complex Andover shall keep records of the board feet kiln dried on a calendar basis. If, in the future, the facility does dry firewood in the kilns, the amount of fire wood dried shall also be recorded.

H. Annual Emissions

Wood Products Complex Andover shall be restricted to the following annual emissions, based on a 12 month rolling total, calculated using the 300,000 gal/year oil limit on Boiler 2, 8760 hours/year operation of Boiler 3, 500 hours/year operation of the generator, and kiln emissions:

Total Licensed Annual Emissions for the Facility

Tons/year

(used to calculate the annual license fee)

	PM	PM₁₀	SO₂	NO_x	CO	VOC
Boiler 2	4.2	4.2	10.6	10.5	0.8	0.03
Boiler 3	15.8	15.8	1.3	25.8	31.5	0.9
Generator 1	0.11	0.11	0.02	1.54	0.33	0.13
Kilns	-	-	-	-	-	2.0
Total TPY	20.1	20.1	11.9	37.8	32.6	3.1

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 is not required for a renewal if the total emissions of any pollutant released do not exceed the following:

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

Based on the total facility licensed emissions, Wood Products Complex Andover is below the emissions level required for modeling.

ORDER

Based on the above, the Department concludes that the applicant for the air emission license transfer has the capacity to satisfy all applicable statutory criteria and hereby APPROVES the transfer of Air Emission License A-317-71-I-R, A-317-71-J-M, and the Air Emission License application for A-317-71-K-R/T, from Andover Division of Ethan Allen Operations, Inc. to Wood Products Complex Andover, LLC subject to all conditions attached to them.

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-317-71-K-R/T 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 M.R.S.A. §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 #2

A. Fuel

1. Total fuel use for Boiler #2 shall not exceed 300,000 gal/yr of #2 fuel oil. [06-096 CMR 115, BPT]
2. Until December 31, 2015, the #2 fuel oil fired in the boiler shall be ASTM D396 compliant (max. sulfur content of 0.5% by weight). [06-096 CMR 115, BPT]
3. Beginning January 1, 2016, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm). [38 MRSA §603-A(2)(A)(3)]
4. Beginning January 1, 2018, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm). [38 MRSA §603-A(2)(A)(3)]
5. Compliance shall be demonstrated by fuel records from the supplier showing the quantity, type, and the percent sulfur of the fuel delivered (if applicable). Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 CMR 115, BPT]

B. Emissions shall not exceed the following:

Emission Unit	PM (lb/MMBtu)	Origin and Authority
Boiler #2	0.2	06-096 CMR 103(2)(A)(1)

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

Emission Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #2 (14.6 MMBtu/hr)	2.92	2.92	7.35	7.30	0.49	0.02

- D. Visible emissions from Boiler #2 shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block averages in a continuous 3-hour period. [06-096 CMR 101]

(17) Boiler #3

- A. Boiler #3 shall fire wood waste. Records of annual fuel use shall be kept on a 12-month rolling total basis. [06-096 CMR 115, BPT]

B. Emissions shall not exceed the following:

Emission Unit	PM (lb/MMBtu)	Origin and Authority
Boiler #3	0.3	06-096 CMR 103(2)(B)(4)(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 #3 (12.0 MMBtu/hr)	3.60	3.60	0.30	5.88	7.20	0.20

D. The facility shall continuously operate the Breslove Separator cyclone on the emissions from Boiler #3 whenever Boiler #3 is in operation. [06-096 CMR 115, BPT]

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

(18) **Emergency Generator**

A. The emergency generator is limited to 500 hours per year total operation, based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours. [06-096 CMR 115]

B. The fuel oil sulfur content for the emergency generator shall be limited to 0.05% sulfur by weight. Compliance shall be demonstrated by fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 CMR 115, BPT]

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

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Emergency Generator (1.4 MMBtu/hr, diesel)	0.43	0.43	0.07	6.17	1.33	0.50

D. Visible emissions from the diesel generator shall not exceed 30% opacity on a 6 minute block average, except for no more than two (2) six (6) minute block averages in a 3 hour period. [06-096 CMR 101]

- E. The emergency generator shall meet the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, including the following:
1. No later than May 3, 2013, Wood Products Complex Andover shall meet the following operational limitations for the compression ignition emergency generator:
 - a. Change the oil and filter annually,
 - b. Inspect the air cleaner annually, and
 - c. Inspect the hoses and belts annually and replace as necessary.A log shall be maintained documenting compliance with the operational limitations. [40 CFR §63.6603(a) and Table 2(d); and 06-096 CMR 115]
 2. A non-resettable hour meter shall be installed and operated on the generator. [40 CFR §63.6625(f)]
 3. Maintenance, Testing, and Non-Emergency Operating Situations
 - a. The generator shall be limited to 100 hours/year for maintenance and testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving or generating income or a financial arrangement with another entity). A maximum of 15 hours per year (of the 50 hours/year) may be used as part of a demand response program. These limits are based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours. [40 CFR §63.6640(f)(1) and 06-096 CMR 115]
 - b. Wood Products Complex Andover shall keep records that include maintenance conducted on the generator and the hours of operation recorded through the non-resettable hour meter. Documentation shall include the hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency. If the generator is used for demand response operation, Wood Products Complex Andover must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [40 CFR §63.6655(e) and (f)]
 4. The generator shall be operated and maintained according to the manufacturer's emission-related written instructions or Wood Products Complex Andover shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]

(19) **Material Handling and Storage**

- A. Wood Products Complex Andover shall operate the wood fuel handling and storage system in a manner to minimize particulate emissions. Maintenance records shall be kept, including routine or emergency repairs to the system. [06-096 CMR 115, BPT]
- B. Visible emissions from the fuel feed cyclone and the Breslove Separator cyclone shall each not exceed 20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]
- C. Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed an opacity of 20%, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20% in any one (1) hour. [06-096 CMR 101]

(20) **Kilns**

Wood Products Complex Andover shall keep records documenting calendar year kiln throughput (board feet) for the four kilns. If firewood is dried in the kilns in the future, the amount of firewood dried shall also be recorded. [06-096 CMR 115]

(21) **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.

Wood Products Complex Andover, LLC
Oxford County
Andover, Maine
A-317-71-K-R/T

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- (22) Wood Products Complex Andover 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 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 22nd DAY OF August, 2011.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie P. Gifford
PATRICIA W. AHO, 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: October 6, 2010

Date of application acceptance: October 29, 2010

Date filed with the Board of Environmental Protection:

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



