



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

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COMMISSIONER

Hardwood Products Company LLC
Piscataquis County
Guilford, Maine
A-328-71-K-R

Departmental
Findings of Fact and Order
Air Emission License
Renewal

After review of the air emissions license renewal 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., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Hardwood Products Company LLC is a manufacturer of wood-based items using northern white birch for such products as medical devices (such as tongue depressors and cotton swabs) and food wares (such as food sticks and wooden "spoons" for ice cream cups). Hardwood Products Company LLC (HPC) has applied to renew their Air Emission License permitting the operation of emission sources associated with their wood products manufacturing facility.

Equipment addressed in this license is located at 31 School Street in Guilford, Maine.

B. 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, % sulfur</u>	<u>Install. Date</u>	<u>Stack #</u>
Boiler #1	13.9	3170 lb/hr	wood	1913	1
Boiler #2	13.9	3170 lb/hr	wood	1937	1
Boiler #3	2.8	19.8 gal/hr	#2 fuel, 0.5%	1985	2

Process Equipment

<u>Equipment</u>	<u>Pollution Control Equipment</u>	<u>Stack #</u>
Pneumatic Conveyors (6)	cyclones	4 - 9
Degreaser Units (2)	--	--

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

C. Application Classification

The application for HPC 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 currently licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended).

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 and 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.

Emissions from specific units at this facility include particulate matter (PM, PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC).

B. Boilers #1 and #2

HPC operates Boilers #1 and #2 for steam and heat to support facility operations. The boilers are each rated at 13.9 MMBtu/hr and fire wood. Boilers #1 and #2 were installed in 1913 and 1937, respectively. Boilers #1 and #2 exhaust through the same 80 ft. above ground level stack. Boilers #1 and #2 are equipped with multiple centrifugal separators to control particulate matter emissions.

Waste wood material is used as boiler fuel by first running it through a hammer-mill hog to pulverize the wood into small pieces for more uniform and consistent combustion. The wood waste is then burned in the two horizontal return tube boilers which use automatic controls to monitor performance and maximize efficiency.

Boilers #1 and #2 were installed prior to 1989 and are 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 units greater than 10 MMBtu/hr manufactured after June 9, 1989.

1. BPT Findings

The BPT emission limits for the boilers were based on the following:

- PM, PM₁₀ – 0.55 lb/MMBtu, 06-096 CMR 103
- SO₂ – 0.025 lb/MMBtu, AP-42 Table 1.6-2, dated 9/03
- NO_x – 0.49 lb/MMBtu, AP-42 Table 1.6-2, dated 9/03
- CO – 0.60 lb/MMBtu, AP-42 Table 1.6-2, dated 9/03
- VOC – 0.017 lb/MMBtu, AP-42 Table 1.6-2, dated 9/03
- Opacity – 06-096 CMR 101(2)(B)(1)(e) (dated 5/03)

The BPT emission limits for the boilers are the following:

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM₁₀ (lb/hr)</u>	<u>SO₂ (lb/hr)</u>	<u>NO_x (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
Boiler #1 (13.9 MMBtu/hr), wood	7.65	7.65	0.35	6.81	8.34	0.24
Boiler #2 (13.9 MMBtu/hr), wood	7.65	7.65	0.35	6.81	8.34	0.24

Opacity - Visible emissions from each boiler firing wood waste or biomass shall not exceed 30% opacity on a 6-minute block average basis, except for no more than two (2) six (6) minute block averages in a 3 hour period.

HPC shall be limited to a total of 10,800 tons/yr of wood fired in Boilers #1 and #2 on a 12-month rolling total basis based on a fuel moisture content of 33%. HPC shall use the following formula, when necessary, to convert fuel use records to 33% moisture:

Tons Wood at 33% moisture =

$$\frac{[\text{Actual Tons Wood}] \times [100 - (\text{actual \% moisture content, by weight})]}{67}$$

2. Periodic Monitoring

Periodic monitoring for Boilers #1 and #2 shall include recordkeeping to document fuel use on a monthly and a 12-month rolling total basis for each boiler.

3. Non-Spec. Continuous Opacity Monitors (COM)

HPC operates a separate opacity meter for each of these two boilers. The meters are not required by the license and are therefore not maintained under 06-096 CMR 117. Operators use the meters to monitor boiler function to facilitate compliance with licensed opacity limits.

4. 40 CFR Part 63 Subpart JJJJJ

Boilers #1 and #2 are existing biomass industrial boilers as defined in 40 CFR §63.11237 that are located at or are part of an area source of hazardous air pollutants (HAP), as defined in §63.2, and may be subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63, Subpart JJJJJ). However, 40 CFR Part 63, Subpart JJJJJ is currently under reconsideration by the EPA, and the applicability of the Subpart to this source may change, contingent upon the final specifications and requirements of the proposed amendments.

For informational purposes, a summary of the currently promulgated 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, HPC may still be 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>.

a. Compliance Dates, Notifications, and Work Practice Requirements

i. Initial Notification of Compliance

An Initial Notification submittal to EPA was due on September 17, 2011. [40 CFR Part 63.11225(a)(2)]

ii. Boiler Tune-Up Program – Initial and Biennial

(a) A boiler tune-up program shall be implemented to include the tune-up of applicable boilers by March 21, 2012, according to the rule currently in place. [40 CFR Part 63.11196(a)(1)] However, a No Action Assurance letter was issued on March 13, 2012, stating that EPA will exercise its enforcement discretion to not pursue enforcement action for failure to complete the required tune-up by the stated compliance date. The rule is expected to have a future compliance date in either 2013 or 2014 once the final revisions are promulgated.

- (b) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
1. 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)]
 2. 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)]
 3. 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)]
 4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
 5. 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)]
 6. 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)]
- (c) 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)]
- (d) The facility shall implement a biennial boiler tune-up program after the initial tune-up and initial compliance report has been submitted.
1. Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up. [40 CFR Part 63.11223(a)]
 2. 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, measured 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)]

iii. Energy Assessment

- (a) A one-time energy assessment shall be performed by a qualified energy assessor on the applicable boilers by March 21, 2014. [40 CFR Part 63.11196(a)(3)]
- (b) 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)]
- (c) 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)]

b. 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.

C. Boiler #3

Boiler #3 is a small package boiler used primarily for facility hot water needs. The boiler is rated at 2.8 MMBtu/hr and fires #2 fuel oil. The boiler was installed in 1985 and exhausts through its own stack, Stack #2.

Due to the size and year of installation, Boiler #3 is not subject to NSPS 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989.

1. BPT Findings

The BPT emission limits for the boiler were based on the following:

PM, PM ₁₀ –	0.12 lb/MMBtu, 06-096 CMR 103
SO ₂ –	0.5 lb/MMBtu based on firing ASTM D396 #2 fuel oil (0.5% sulfur)
NO _x –	0.3 lb/MMBtu based on previous licenses
CO –	5 lb/1000 gal, AP-42, Table 1.3-1, dated 5/10
VOC –	0.2 lb/1000 gal, AP-42, Table 1.3-3, dated 5/10
Opacity –	06-096 CMR 101(2)(B)(1)(b) (dated 5/03)

The BPT emission limits for the boilers are the following:

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM₁₀ (lb/hr)</u>	<u>SO₂ (lb/hr)</u>	<u>NO_x (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
Boiler #3 (2.8 MMBtu/hr), #2 fuel oil	0.34	0.34	1.4	0.84	0.10	0.01

Visible emissions from Boiler #3 shall not exceed 20% opacity on a 6 minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period.

HPC shall be limited to 100,000 gal/yr of #2 fuel oil fired in Boiler #3.

Prior to January 1, 2016, the fuel oil fired in Boiler #3 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).

2. Periodic Monitoring

Periodic monitoring for the boiler shall include recordkeeping to document fuel use both on a monthly and 12-month rolling total basis. Documentation shall include the type of fuel used and sulfur content of the fuel.

3. 40 CFR Part 63 Subpart JJJJJ

Boiler #3 is an existing oil fired industrial boiler as defined in 40 CFR §63.11237 that is located at or is part of an area source of HAP, as defined in §63.2, and may be subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63, Subpart JJJJJJ). However, 40 CFR Part 63, Subpart JJJJJJ is currently under reconsideration by the EPA, and the applicability of the Subpart to this source may change, contingent upon the final specifications and requirements of the proposed amendments.

The summary of the currently promulgated applicable federal 40 CFR Part 63, Subpart JJJJJ requirements provided previously in section II (B)(4) of the findings of fact of this air license renewal may apply to Boiler #3 as well.

D. Process Equipment

HPC uses a pneumatic conveying system to transport scrap material throughout the mill. Particulate emissions from the pneumatic conveyors are controlled by a number of cyclones, each of which exhausts through its own stack. This equipment is itemized as follows:

<u>Unit ID</u>	<u>Type of Equipment</u>	<u>Manufacture Date</u>	<u>Stack #</u>	<u>Control Device</u>
1	Pneumatic conveyor	1959	4	Cyclone
2	Pneumatic conveyor	1959	5	Cyclone
3	Pneumatic conveyor	1990	6	Cyclone
4	Pneumatic conveyor	1976	7	Cyclone
5	Pneumatic conveyor	1964	8	Cyclone
6	Pneumatic conveyor	1966	9	Cyclone

Visible emissions from any general process source, including the pneumatic conveyors and cyclones, shall not exceed 20% 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.

E. Degreaser Units

The degreaser units have a design capacity of 30 gallons each using petroleum naphtha as the solvent. The degreaser units are subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended), and records shall be kept documenting compliance.

F. Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity 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.

G. Annual Emissions

1. Total Licensed Annual Emissions

HPC shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits were calculated based on a total of 10,800 tons/yr of wood fired in Boilers #1 and #2 with a fuel moisture content of 33% and a maximum of 100,000 gal/yr of #2 fuel oil fired in Boiler #3.

Total Licensed Annual Emissions for the Facility

Tons/year

(used to calculate the annual license fee)

	<u>PM</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>NO_x</u>	<u>CO</u>	<u>VOC</u>
Boilers #1 and #2	35.8	35.8	1.6	31.9	39.1	1.1
Boiler #3	0.8	0.8	3.5	2.1	0.3	0.1
Total TPY	36.6	36.6	5.1	34.0	39.4	1.2

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans*, 40 CFR Part 52, Subpart A, §52.21 Prevention of Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

Based on the facility's fuel use limits, the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, HPC is below the major source threshold of 100,000 tons of CO₂e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

III. AMBIENT AIR QUALITY ANALYSIS

HPC previously submitted an ambient air quality analysis for air emission license A-328-71-H-M/R, dated April 30, 2001, 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-328-71-K-R 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-A. [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. Fuel

Total fuel use for Boilers #1 and #2 shall not exceed 10,800 tons/yr wood on a 33% moisture content basis. Compliance shall be demonstrated by records of fuel use kept on a monthly and a 12-month rolling total basis. [06-096 CMR 115, BPT]

B. Emission Limits

Emissions shall not exceed the following:

<u>Unit</u>	<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>Origin and Authority</u>
Boiler #1	PM	0.55	06-096 CMR 103 (2)(A)(3)(a)
Boiler #2	PM	0.55	

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

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM₁₀ (lb/hr)</u>	<u>SO₂ (lb/hr)</u>	<u>NO_x (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
Boiler #1 (13.9 MMBtu/hr), wood	7.65	7.65	0.35	6.81	8.34	0.24
Boiler #2 (13.9 MMBtu/hr), wood	7.65	7.65	0.35	6.81	8.34	0.24

C. Control Equipment

HPC shall establish a system of maintenance, inspection, and repair for the multiple centrifugal separators on Boilers #1 and #2 which shall allow for a monthly inspection of the system. HPC shall document compliance by means of a maintenance, inspection, and repair log. HPC shall inspect operation and integrity of the multiple centrifugal separators and associated hoppers once per month and record findings in the maintenance, inspection, and repair log. [06-096 CMR 115, BPT]

D. Visible Emissions

Visible emissions from each boiler firing wood waste or biomass shall not exceed 30% opacity on a 6-minute block average basis, except for no more than two (2) six (6) minute block averages in a 3 hour period.

(17) **Boiler #3**

A. Fuel

1. Total fuel use for Boiler #3 shall not exceed 100,000 gal/yr of #2 fuel oil on a 12-month rolling total basis.
2. Prior to January 1, 2016, the #2 fuel oil fired in Boiler #3 shall be ASTM D396 compliant (maximum 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. Records of annual fuel use shall be kept on a monthly and a 12-month rolling total basis. [06-096 CMR 115, BPT]

B. Emission Limits

Emissions shall not exceed the following:

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

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

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM₁₀ (lb/hr)</u>	<u>SO₂ (lb/hr)</u>	<u>NO_x (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
Boiler #3 (2.8 MMBtu/hr), #2 fuel oil	0.34	0.34	1.4	0.84	0.10	0.01

C. Visible Emissions

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

(18) **Process Equipment**

Visible emissions from any general process source, including the cyclones controlling particulate emissions from pneumatic conveyors, shall 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.

(19) **Parts Washers**

Parts washers at HPC are subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended).

- A. HPC 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 06-096 CMR 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, 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 cold cleaning machines that are applicable sources under Chapter 130.
 1. HPC shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
 - (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 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 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 used to clean spills shall then 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]

(20) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity, 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]

(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 either

- 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.

- (22) HPC 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 20th DAY OF June, 2012.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie S. [Signature]
PATRICIA W. AHO, 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: March 31, 2011

Date of application acceptance: April 13, 2011

Date filed with the Board of Environmental Protection:

This Order prepared by Jane Gilbert, Bureau of Air Quality.

