



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
ACTING COMMISSIONER

Maine Woods Company, LLC)
Aroostook County) Departmental
Portage, Maine) Findings of Fact and Order
A-736-71-E-R (SM)) Air Emission License

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., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Maine Woods Company, LLC (Maine Woods) located at 92 Fish Lake Road in Portage, Maine has applied to renew their air emission license, permitting the operation of emission sources associated with their hardwood sawmill and lumber drying facility.

B. Emission Equipment

The following equipment is addressed in this license:

Fuel Burning Equipment

Equipment	Maximum Capacity	Fuel Type	Maximum Firing Rate	Ctrl Eqpmnt	Stack #
Boiler #1	28.8 MMBtu/hr	wood	3.2 ton/hr **	dual multicyclone	1
Furnace	3.5 MMBtu/hr	#2 oil, ASTM *	25 gal/hr	none	2

* The facility fires fuel which meets the criteria in ASTM D396 for #2 fuel oil
** based on wood with a moisture content of 50%, Higher Heating Value = 4500 Btu/lb

Process Equipment

Equipment	Maximum Capacity	Control Equipment
Drying Kilns	24.3 million board feet/year	none

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

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Equipment	Maximum Capacity	Control Equipment
Saw Rip-Line	50,000 bf/day *	cyclone

* board feet (bf) per day

C. Application Classification

The application for Maine Woods does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of current licensed emission units only and has been processed through Major and Minor Source Air Emission License Regulations, 06-096 CMR 115 (as amended). With the fuel limit on the boilers and lumber throughput restriction on the drying kilns, the facility is licensed below the major source thresholds and is considered a synthetic minor.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Definitions Regulation, 06-096 CMR 100 (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.

Before proceeding with the control requirements for each unit a general process description is provided to identify where the equipment fits into the process.

Process Description

Maine Woods manufactures green and dried hardwood lumber. Hardwood logs are delivered to the pile down area by trucks. The logs are accepted in pre-cut and

tree length form. Tree length material is slashed off-site and stored. From the pile down area, logs are transferred by truck to the mill in-feed deck. Once debarked, the logs are sawed into lumber.

Slabs and edgings are chipped. After screening to remove fines and dust, the chips are mechanically conveyed to concrete storage bins. From there the chips are conveyed to container trucks. The station is equipped with a railcar cover to minimize fugitive emissions during loading. Bark and sawdust generated by the sawmill is burned in the boiler. Excess wood waste is sold to off-site markets.

Green lumber exits the sawmill as strapped bundles ready for shipment or as stickered bundles. The latter are transferred to the covered in-feed carriages of the dry kilns using mobile lumber lifts. There are a series of several side-by-side steam heated, track style lumber dry kilns. The drying kilns dry the lumber after it has been cut to size. From the dry kilns, the dry lumber is strapped for shipment.

The kilns are heated with steam from Maine Woods' biomass boiler. Emissions result from the release of VOCs (including pinenes, terpenes, aldehydes, ketones and methanol) from the tannins, resins, fats, waxes, oils, gums and other aromatic compounds which naturally occur in the wood and are released during kiln drying. VOC emissions are emitted through roof vents from the drying kiln with the moisture (water vapor) extracted from the lumber. The kilns process hardwood species including Sugar Maple, Oregon (Soft) Maple and Yellow Birch.

B. Boiler #1

Boiler #1 fires green hardwood sawdust and hogged bark with an approximate wet basis moisture content of 50%. The boiler, which exhausts to a 55-foot tall stack, has a maximum capacity of 28.8 MMBtu/hr and was manufactured in 1998. It is therefore subject to EPA's New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for boilers with heat inputs between 10 MMBtu/hr and 100 MMBtu/hr, manufactured after June 9, 1989. Boiler #1 is not subject to the Subpart Dc standards for sulfur dioxide (section 60.42c) or particulate matter (section 60.43c) because the boiler fires wood and has a capacity of less than 30 MMBtu/hr.

The boiler is also subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR Part 63 Subpart JJJJJ).

The regulated pollutants emitted from the #2 oil-fired boilers are particulate matter (PM), particulate matter with a diameter smaller than ten microns (PM₁₀),

sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC). Emissions from Boiler #1 are vented to a multiclone to control particulate matter (PM). Remaining pollutants are minimized through good combustion practices.

A summary of the BPT analysis for Boiler #1 at Maine Woods is the following:

1. Continued use of a multiclone and continued good combustion practices.
2. PM emission limits calculated based on the maximum fuel input, ash and carbon carryover, and the efficiency of the multiclone. The PM₁₀ emission limit is based on AP-42 factors in which 61% of the emitted particulate matter was less than 10 microns in aerodynamic diameter. These PM limits meet the requirements of 06-096 CMR 103 (as amended) of the Department's regulations.
3. SO₂, NO_x and VOC emission limits are based on EPA's AP-42 factors, dated 7/01 for wood fired boilers.
4. CO emissions are calculated based on performance data from the manufacturer.
5. Visible emissions from Boiler #1 shall not exceed 20%, except for one six minute period per hour of not more than 27% opacity.
6. The wood-fired boiler is subject to the NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR Part 63 Subpart JJJJJ). The unit is rated greater than 10 MMBtu/hr but fires wood/biomass and therefore the unit is not subject to specific PM, CO, or mercury emission limits from 40 CFR Part 63 Subpart JJJJJ.

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 Maine Woods is still subject to the requirements. The rule states that all affected facilities must conduct boiler tune-ups and perform a one time boiler energy assessment. For existing sources, the boiler tune-up must be completed by March 21, 2012.

- 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 all applicable boilers by March 21, 2012. [40 CFR Part 63.11196(a)(1)]

- A one time Energy Audit shall be implemented prior to March 21, 2014. [40 CFR Part 63. 63.11201(b)]
- 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.
- 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.

Boiler Tune-up

After the initial tune-up and initial compliance report has been submitted, Maine Woods 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)]

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All existing boilers greater than 10 million BTU per hour are required to conduct an energy assessment to identify cost-effective energy conservation measures. The Energy Audit requirement must be met by March 21, 2014.

Energy Assessment

The rule includes a one-time energy assessment of cost-effective energy conservation measures that would be required for affected units (greater than 10 MMBtu/hr). The energy audit must be completed by qualified personnel knowledgeable with evaluating energy systems and should include an assessment of the facility's energy management program and practices using EPA's ENERGY STAR Facility Energy Management Assessment Matrix. Facilities would be required to identify cost-effective solutions (those with a payback period of less than two years), but facilities are not required to implement findings of the audit. The procedures for an energy assessment are:

- Conduct a visual inspection of the boiler system
- Establish operating characteristics of the facility, energy system specifications, operating and maintenance procedures, and unusual operating constraints
- Identify major energy consuming systems
- Review available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage
- Identify a list of major energy conservation measures
- Determine the energy savings potential of the energy conservation measures identified
- Prepare a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments

Periodic Monitoring

Periodic monitoring for the Boiler #1 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.

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C. Furnace

Maine Woods operates a 3.5 MMBtu/hr boiler in the garage/office building located on site. The Furnace fires #2 fuel oil, and is not subject to NSPS 40 CFR Part 60 Subpart Dc due to its size. However, the boiler is subject to National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR Part 63 Subpart JJJJJ).

BPT for the Furnace is the following:

1. The firing of #2 fuel oil which meets the criteria of ASTM D396 for #2 oil. Until December 31, 2015, the #2 fuel oil fired in the boiler shall be ASTM D396 compliant #2 fuel oil (maximum sulfur content limit 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). Compliance shall be demonstrated by fuel records from the supplier showing the quantity, type, and sulfur content of the fuel delivered.
2. PM emission limits are regulated by 06-096 CMR 103 (as amended). PM₁₀ emission limits are based on the PM limits
3. NO_x, CO and VOC emission limits are based on EPA's AP-42 data dated 9/03 for boilers firing fuel oil.
4. Visible emissions from the Furnace's stack shall not exceed 20% opacity on a 6 minute block average.
5. The furnace is 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 unit is rated under 10 MMBtu/hr and is thus not subject to PM, CO, or mercury emission limits from 40 CFR Part 63 Subpart JJJJJ. For informational purposes, a summary of the applicable federal 40 CFR Part 63 Subpart JJJJJ requirements are listed below:
 - 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 all applicable 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.
 - 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,

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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.

Boiler Tune-up

After the initial tune-up and initial compliance report has been submitted, Maine Woods 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)]

D. Wood Drying Kilns

Maine Woods operates nine side-by-side steam heated, track style lumber dry kilns. Maximum capacity in the kilns is limited to 24,334,000 board feet per year. VOC emissions released during the wood drying process have been estimated using data from studies conducted by the National Council of the Paper Industry

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The pollutant of concern from the rip-line saw is particulate matter. Maine Woods operates a cyclone to reduce particulate matter from the rip-line saw. The cyclone meets the definition of BPT for this process, other add-on PM emission controls were determined not technically or economically feasible. Maine Woods shall meet the general process equipment opacity limit established in 06-096 CMR 101.

F. Fugitive Particulate Emissions

Fugitive particulate matter may potentially be emitted in the wood waste transfer and collections system, including the transfer of wood chips to railcars. Potential sources of fugitive PM emissions also include material stockpiles and unpaved roadways, and ash handling. Maine Woods shall maintain all potential fugitive particulate matter sources to prevent visible emissions in excess of 20% opacity on a six minute block average basis for more than one (1) six (6) minute block average in a 1- hour period.

G. Facility Emissions

Facility emissions were based on continuous operation of Boiler #1 and the heater unit and a maximum wood throughput for the kilns of 24.3 million board feet per year. Maine Woods has the following emissions, based on a 12 month rolling total:

Total Annual Emissions
(used to calculate the annual license fee)

Pollutant	Boiler #1 (tons)	Furnace (tons)	Drying Kilns (tons)	Total Tons/year
PM	27.7	1.9	--	29.6
PM ₁₀	16.9	1.9	--	18.8
SO ₂	3.1	7.7	--	10.8
NO _x	27.7	6.1	--	33.8
CO	75.4	0.6	--	76.0
VOC	2.1	0.1	27.5	29.7

III. AMBIENT AIR QUALITY ANALYSIS

Maine Woods previously submitted an ambient air quality analysis for air emission license A-736-71-A-N issued May 29, 1998 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-736-71-E-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

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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) **Boiler #1**

- A. Maine Woods shall fire wood fuel in Boiler #1. Maine Woods may also fire sawdust, oily sawdust, and oily rags.
- B. The following limits shall not be exceeded by Boiler #1:

Boiler #1 Emission Limits

Pollutant	lb/MMBtu	lb/hr
PM	0.22	6.4
PM ₁₀	--	3.5
SO ₂	--	0.7
NO _x	--	6.4
CO	--	17.3
VOC	--	0.5

- C. Maine Woods shall operate and maintain a multiclone on the emissions from Boiler #1. Maine Woods shall keep a maintenance log of all failures and maintenance, routine or otherwise, on the multiclone.
- D. Boiler #1 is subject to 40 CFR 60 Subpart Dc, New Source Performance Standards for boilers with heat inputs between 10 MMBtu/hr and 100 MMBtu/hr and manufactured after June 9, 1989. Maine Woods shall comply with all applicable monitoring, record keeping and reporting requirements of Subparts A and Dc.
- E. Visible emissions from Boiler #1 shall not exceed 20%, except for one six minute period per hour of not more than 27% opacity.

(17) **Furnace**

- A. Maine Woods shall fire only #2 fuel oil for the furnace which meets the criteria of ASTM D396 for #2 oil. Compliance shall be demonstrated by fuel records from the supplier showing type of fuel delivered (ASTM D396

compliant). The following is a description of future laws (specifically 38 MRSA §603-A(2)(A)(3)) affecting #2 oil:

1. Until December 31, 2015, the #2 fuel oil fired in the furnace shall be ASTM D396 compliant #2 fuel oil (maximum sulfur content limit of 0.5% by weight).
2. Beginning January 1, 2016, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm),
3. Beginning January 1, 2018, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm).
4. Compliance shall be demonstrated by fuel records from the supplier showing the quantity, type, and sulfur content of the fuel delivered.

[38 MRSA §603-A(2)(A)(3), 06-096 CMR 115, BPT]

B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Furnace	PM	0.12	06-096 CMR 103(2)(B)(1)(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)
Furnace	0.4	0.4	1.8	1.4	0.2	0.1

D. Visible emissions from the furnace 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]

(18) **Drying Kilns**

- A. Yearly throughput is limited to 24.3 million board feet per year based on a 12-month rolling total. Compliance shall be demonstrated through kiln loading records.
- B. Maine Woods shall dry hardwood species in the drying kilns and shall notify the Department prior to drying softwood species in the kilns.
- C. Visible emissions from the drying kiln vents shall not exceed 20% opacity on a 6-minute block average, except for no more than one 6-minute block averages in a 1-hour period. [MEDEP Chapter 101]

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average basis, except for no more than one (1) six (6) minute block average in a 1-hour period.

Maine Woods shall maintain the following records:

- a) Maine Woods will perform daily visual inspections of the cyclone to assure proper operation and have documentation that this will be done in their Standard Operating Procedure manual.
- b) A description of any maintenance or repairs of the cyclone that resulted from the inspection will be kept on file.

(20) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles, wood chip piles, ash handling, 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]

(21) **General Process Sources**

Visible emissions from any general process source shall not exceed an opacity of 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. [06-096 CMR 101]

(22) **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 (as amended).

(23) Maine Woods 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).

(24) A copy of this Order shall be kept on site and the operator(s) shall be familiar with the terms and conditions of the Order.

Maine Woods Company, LLC)
Aroostook County)
Portage, Maine)
A-736-71-E-R (SM) 17

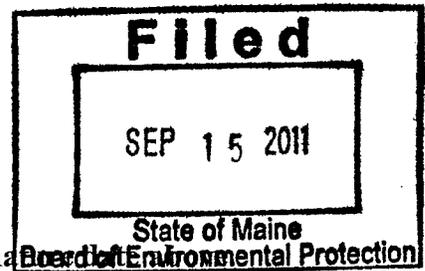
Departmental
Findings of Fact and Order
Air Emission License

- (24) A copy of this Order shall be kept on site and the operator(s) shall be familiar with the terms and conditions of the Order.

DONE AND DATED IN AUGUSTA, MAINE THIS 14th DAY OF September 2011.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie L. G. For
PATRICIA W. AHO, ACTING COMMISSIONER



The term of this license shall be five (5) years from the signature

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: May 12, 2008

Date of application acceptance: June 2, 2008

Date filed with Board of Environmental Protection: _____

This order prepared by Edwin Cousins, Bureau of Air Quality

