

STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**Katahdin Forest Products Co.
Aroostook County
Oakfield, Maine
A-939-71-C-R/M**

**Departmental
Findings of Fact and Order
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., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Katahdin Forest Products Co. (Katahdin Forest Products) has applied to renew their Air Emission License permitting the operation of emission sources associated with their cedar log home facility. This renewal includes a fuel limit to bring Katahdin Forest Products' annual emissions below the annual reporting threshold. In addition, the renewal addresses an allowance for sawdust and shavings used to absorb on-site oil spills to be burned in the boiler.

The equipment addressed in this license is located at 205 Oakfield/Smyrna Road in Oakfield, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boiler

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (ton/hr)</u>	<u>Fuel Type</u>	<u>Installation Date</u>	<u>Control Equipment</u>
Boiler #1	14.2	1.38 *	wood/bark waste	2006 (mfg date 1991)	multiclone

* Firing rate calculated based on wood at 43% moisture and with a higher heating value of 5,130 Btu/lb.

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

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

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

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143

Process Equipment

<u>Equipment</u>	<u>Production Rate</u>	<u>Pollution Control Equipment</u>
Kiln	3.0 million board feet/year**	-
Paint Dip Tanks (2)	30 gal/year	-
Band Saw Mill – single surface planar	0.005 MM bd ft/year (finished product)	Cyclone
Picket Mill – 1x3 planar	1.50 MM bd ft/year	Cyclone
Planar Mill	3.4 MM bd ft/year	Cyclone

** This is a reduction from the previously licensed 10 MM bd ft/yr.

Katahdin Forest Products also operates a solvent degreaser.

C. Application Classification

The applications submitted by Katahdin Forest Products included a renewal and a minor revision request to fire on-site spilled oil absorbed with wood waste. The applications did 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 as a natural minor 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 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

Katahdin Forest Products saws logs and manufactures pre-cut log homes for delivery to sites across the United States. Log length cedar, pine and spruce are debarked, sawed to length, ripped to the appropriate cross section, and stockpiled for drying and further milling and machining. The sawmill waste is hogged and stockpiled. The products are moved from building to building by forklift since many of the operations are conducted in separate buildings. The log cabin wall stock (typically cedar, but optionally pine) is milled for tongue and groove construction and appropriate end lap in the automated house line, a state-of-the-art computer controlled facility. Other components of the log home package, such as cedar paneling, cedar decking and spruce roof purlins are manufactured on-site. Additional items including windows, doors, insulation, and roofing materials are brought to the site for packaging with the complete home kit to be shipped to the builder.

The cedar remaining after the cabin stock is sawed is processed into cedar fencing and shipped to various dealers for resale. The smaller scraps of waste wood are utilized by Cedar Ideas, Inc., a separate company with common ownership and management located adjacent to the Katahdin Forest Products site. Cedar Ideas uses the wood scraps to manufacture various specialty items including window boxes, planters, birdhouses, and assorted novelty products. Many of the Cedar Ideas products are painted or finished in a dipping process. All remaining wood by-products, such as sawdust, bark, and shavings are fired in the biomass boiler to generate heat for kiln drying and other energy needs.

B. Boiler #1

Boiler #1 is a wood-fired low pressure steam boiler with a capacity rating of 14.2 MMBtu/hr and a firing rate of 1.38 tons/hour, based on 43% moisture content wood. The boiler, purchased from another facility, was installed at Katahdin Forest Products in 2006. The unit is a Superior Boiler Model 3-SF-2001-515-M, Low Pressure Steam Boiler manufactured in 1991 and exhausts through a Zurn/Clarage model MTSA-12-9CYT-A-N/RSTD multiclone. The stack has an inside diameter of 1.83 feet and is 76 feet above ground level.

Boiler fuel consists of cedar waste from the 10-foot and 6-foot sawmills. This waste stream is a mixture of hogged slabs with bark and sawdust. The remaining waste stream from the various mill operations is a mixture of shavings, chips, sawdust and bark and is an estimated 50/50 mixture of air dried and kiln dried material. The facility's average fuel moisture content is estimated at 43%, from tests performed between June 2004 and March 2005.

Katahdin Forest Products may also fire sawdust and shavings used to absorb oil spills that occur at the facility. This oil infused wood fuel shall be mixed with the sawdust and shavings prior to being fed into the boiler. Katahdin Forest Products shall keep records of any oil infused wood fuel fired, including the on-site origin of the oil and the estimated amount of oil in the wood waste.

Katahdin Forest Products has proposed an annual fuel limit of 6000 tons/year (wet), measured by monitoring a rotating feed valve which delivers 0.235 lb/dump.

Due to the size and manufacture date, the boiler is 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. Subpart Dc includes fuel recordkeeping and semi-annual report requirements.

1. BACT/BPT Findings

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

PM/PM₁₀ – 0.25 lb/MMBtu based on BACT; 3.55 lb/hr
SO₂ – 0.025 lb/MMBtu from AP-42 Table 1.6-2 dated 9/03; 0.36 lb/hr
NO_x - 0.22 lb/MMBtu from AP-42 Table 1.6-2 for wet wood dated 9/03;
3.12 lb/hr
CO - 0.6 lb/MMBtu from AP-42 Table 1.6-2 dated 9/03; 8.52 lb/hr
VOC - 0.017 lb/MMBtu from AP-42 Table 1.6-2 dated 9/03; 0.24 lb/hr

Opacity – Visible emissions from Boiler #1 shall not exceed 30% opacity on a 6-minute block average basis, except for no more than two 6-minute block averages in a 3-hour period.

Periodic Monitoring

Periodic monitoring for the boiler shall include recordkeeping to document fuel use both on a monthly and 12 month rolling total basis. A maintenance log shall be kept for the multiclone.

2. 40 CFR Part 63 Subpart JJJJJ

Boiler #1 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 considered an existing biomass boiler.

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 Katahdin Forest Products 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>.

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 the boiler by March 21, 2012. [40 CFR Part 63.11196(a)(1)]

(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 boiler 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 the 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. Process Equipment

Particulate matter emissions from the sawmill, planar mill, and picket mill are controlled by cyclones. The process cyclones shall be visually inspected at least once a quarter. A maintenance log shall be kept for the process cyclones. Visible emissions from the process cyclones and any general process source shall each 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.

D. Wood Drying Kiln

Katahdin Forest Products operates a kiln to dry cedar and pine lumber. The facility is licensed to process 3.0 million board feet per year through the wood drying kiln. VOC emissions released from the kiln during the wood drying process have been estimated using data from studies conducted by the National Council of the Paper Industry for Air and Stream Improvement, Inc. (NCASI) and the University of Maine. The kiln dries cedar species nearly exclusively, therefore the cedar emission factor of 0.12 lb VOC/1000 board feet was used to estimate VOC emissions from the kiln, for a total of 0.20 tons VOC/year. Accounting for factor variability, Katahdin Forest Products shall be limited to 0.5 tons VOC/year. Katahdin Forest Products shall maintain records of wood throughput in the kiln, on a 12-month rolling basis.

E. Paint Dip Tanks

Katahdin Forest Products operates two paint dip tanks, used to coat the novelty wood products produced by Cedar Ideas, Inc. Latex Primer and Acrylic Latex Stain are the coatings applied in the dip tanks. Both products contain small amounts of VOC and HAP. Katahdin Forest Products shall not exceed 2.0 tons/year of VOC or 1.0 tons/year of HAP emissions from the Paint Dip Tanks, on a 12-month rolling total. Katahdin Forest Products shall maintain records of the amount of Latex Primer and Acrylic Latex Stain used and shall calculate VOC and HAP emissions on a monthly and a 12-month rolling basis, assuming that

100% of the VOC and HAP contents from the materials' Material Safety Data Sheets (MSDS) are volatilized to the atmosphere.

F. Degreaser Unit

The degreaser unit has a design capacity of 12 gallons. The degreaser unit is subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended) and records shall be kept documenting compliance.

G. Fugitive Emissions

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.

H. Annual Emissions

Katahdin Forest Products shall be restricted to the following annual emissions on a 12 month rolling total, based on 6000 tons of wood (43% moisture, higher heating value of 5130 Btu/lb) or equivalent, limited kiln wood drying emissions, and limited paint emissions:

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boiler #1	7.7	7.7	0.77	6.77	18.47	0.52
Wood Kilns	--	--	--	--	--	0.5
Paint Dip Tanks	--	--	--	--	--	2.0
Total TPY	7.7	7.7	0.77	6.77	18.47	3.02

Katahdin Forest Products shall not exceed 1.0 ton/year of total HAP from the Paint Dip Tanks

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 and there are no extenuating circumstances:

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

Based on the total facility licensed emissions, Katahdin Forest Products is below the emissions level required for modeling.

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-939-71-C-R/M subject to the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 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) **Boiler #1**

A. Fuel

1. Wood and bark waste shall be fired in Boiler #1. Maximum wood firing shall be limited to 6000 tons/year based on moisture content of 43% and higher heating value of 5130 Btu/lb, or equivalent, on a 12-month rolling total basis. [06-096 CMR 115, BPT]
2. Fuel use shall be measured by monitoring a rotating feed valve. Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 CMR 115, BPT]
3. Katahdin Forest Products may fire sawdust and shavings used to absorb oil spills that occur at the facility. The oil infused wood fuel shall be mixed with the virgin sawdust and shavings prior to being fed into the boiler. Katahdin Forest Products shall keep records of any oil infused wood fuel fired, including the on-site origin of the oil and the estimated amount of oil in the wood waste. [06-096 CMR 115, BPT]

- B. Emissions from Boiler #1 shall be exhausted through a multiclone. A log shall be kept documenting maintenance on the multiclone. [06-096 CMR 115]

- C. Emissions from Boiler #1 shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.25	06-096 CMR 115, BPT

- D. Emissions from Boiler #1 shall not exceed the following [06-096 CMR 115, BPT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	3.55	3.5	0.36	3.12	8.52	0.24

(14.2 MMBt/hr)						
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- E. Visible emissions from Boiler #1 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. [06-096 CMR 101]
- F. Katahdin Forest Products shall comply with all requirements of 40 CFR Part 60, Subpart Dc applicable to Boiler #1 including, but not limited to, the following:
1. Katahdin Forest Products shall record and maintain records of the amounts of each fuel combusted during each day. [40 CFR §60.48c(g)]
 2. Katahdin Forest Products shall submit to EPA and the Department semi-annual reports. These reports shall include the calendar dates covered in the reporting period and records of fuel supplier certifications. The semi-annual reports are due within 30 days of the end of each 6-month period.
 3. The following address for EPA shall be used for any reports or notifications required to be copied to them: Compliance Clerk
USEPA Region 1
5 Post Office Sq. Suite 100
Boston, MA 02109-3912

(17) **Process Equipment**

- A. Particulate emissions from the sawmill, planar mill, and picket mill shall be controlled by cyclones. [06-096 CMR 115, BPT]
- B. A maintenance log shall be kept for the process cyclones. A visual inspection of the cyclones shall take place once a quarter. [06-096 CMR 115, BPT]
- C. Visible emissions from the process cyclones and any general process source shall each 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]

(18) **Wood Drying Kiln**

Wood drying kiln emissions shall be limited to 0.5 tons/year. Compliance shall be demonstrated through kiln loading records, on a 12 month rolling total. [06-096 CMR 115, BPT]

(19) **Paint Dip Tanks**

- A. Katahdin Forest Products shall not exceed 2.0 tons/year of VOC or 1.0 tons/year of HAP emissions from the Paint Dip Tanks, on a 12-month rolling total. [06-096 CMR 115, BPT]
- B. Katahdin Forest Products shall maintain records of the amount of VOC and HAP containing coating used in the Paint Dip Tanks. Katahdin Forest Products shall calculate VOC and HAP emissions from the Paint Dip Tanks on a monthly and 12-month rolling basis, assuming the VOC and HAP contents listed on the coatings' Material Safety Data Sheets (MSDS) and 100% VOC and HAP volatilization. [06-096 CMR 115, BPT]

(20) **Parts Washer**

The parts washer at Katahdin Forest Products is subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended).

- A. Katahdin Forest Products shall keep records of the amount of solvent added to the 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. Katahdin Forest Products 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 shall be immediately stored in covered containers.
 - (viii) Work area fans shall not blow across the opening of the degreaser unit.
 - (ix) The solvent level shall not exceed the fill line.
2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

(21) **Fugitive Emissions**

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]

- (22) Katahdin Forest Products 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 1st DAY OF November, 2011.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie P. Sizemore
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: February 18, 2011

Date of application acceptance: March 2, 2011

Date filed with the Board of Environmental Protection:

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



