



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

Limington Lumber Co.)
Cumberland County) Departmental
East Baldwin, Maine) Findings of Fact and Order
A-714-71-E-R/M (SM)) Air Emission License

After review of the air emissions license 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

Limington Lumber Co., (Limington Lumber) of East Baldwin, Maine has applied to renew their Air Emission License permitting the operation of emission sources associated with their sawmill and planer mill. The facility has also requested a minor revision to increase the allowable throughput for the pre-dryer and wood drying kilns.

B. Emission Equipment

Limington Lumber is authorized to operate the following equipment:

Fuel Burning Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manufacture	Post Combustion Ctrl Equipment	Stack #
Boiler #1	2.91	1010 ^a lb/hr	Wood	1981	Zurn collector	1
Boiler #2	6.28	42.9 gal/hr	#2, 0.5%	1983	none	2
Boiler #3	2.93	20.9 gal/hr	#2, 0.5%	1983	none	3
Boiler #4	12.4	2,751 ^b lb/hr	Wood	2005	Two multiclones in series; staged air combustion	4

^a Based on a heating value of 2860 Btu/hr (60% moisture)

^b Based on wood with a heating value of 4,500 Btu/hr (50% moisture)

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

BANGOR
106 HOGAN ROAD
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 04769-2094
(207) 764-0477 FAX: (207) 760-3143

Wood Processing Equipment

Equipment	Maximum Capacity (MBF/yr) ^b	Post Combustion Ctrl Equipment
Pre-dryer & Steam driven dry kiln	18,100 ^c	none

^b MBF/yr = thousand board feet per year

^c total capacity for both the pre-dryer and kiln (this is an increase from the prior licensed maximum capacity of 16,100 MBF/yr).

C. Application Classification

This application is considered to be a renewal of current licensed emission units. The application also requests to increase kiln throughput which will result in an increase of emissions by less than 4 ton/year for each single pollutant and less than 8 ton/year for all pollutants combined. This modification is determined to be a minor revision and has been processed as such along with a renewal of currently licensed air emission units.

Therefore, the license is considered to be a renewal of current licensed emission units along with a minor revision and has been processed through Minor Source Air Emission License Regulations, 06-096 CMR 115 (last amended December 24, 2005). With the fuel limit on the boilers and the operating hours restriction on the emergency generator, 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 (last amended December 24, 2005). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology

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- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Boiler #1

Limington Lumber produces pine lumber at its mill in East Baldwin. The facility is licensed to operate two wood-fired and two oil-fired boilers as well as a pre-dryer and wood drying kilns. Boiler #1 was manufactured in 1981 with a maximum firing rate of 2.91 MMBtu/hr and fires wood residue with variable heating value and moisture content. Emissions from this equipment are controlled through use of a mechanical collector. It is therefore not subject to EPA New Source Performance Standards (NSPS) Subpart Dc for boilers with a heat input of 10 MMBtu/hr or greater and manufactured after June 9, 1989.

BPT for Boiler #1 is the following:

1. PM emissions shall meet the 0.3 lb/MMBtu emission limit established in 06-096 CMR 103. PM₁₀ emission limits are based on the PM limit.
2. SO₂, NO_x, CO and VOC emission limits are based upon AP-42 data dated 7/01 for wet-wood fired boilers. Emissions from boiler #1 shall be vented through a mechanical collector before entering stack #1.
3. Visible emissions from boiler #1 (stack 1) shall not exceed 30% opacity on a 6-minute block average, except for no more than two (2) six (6) minute block averages in a 3-hour period.

C. Boilers #2 and #3

Boilers #2 and #3 were manufactured in 1983 with maximum firing rates of 6.28 and 2.93 MMBtu/hr respectively, firing #2 fuel oil which meets the criteria in ASTM D396 for #2 fuel oil. Fuel oil usage is limited to 250,000 gallons per 12-month rolling total for the two oil-fired boilers combined. These units, less than 10 MMBtu/hr each, are not subject to NSPS requirements.

BPT for Boilers #2 and #3 is the following:

1. The SO₂ emission limits are based on the firing of fuel which meets the criteria in ASTM D396 for #2 fuel oil.
2. NO_x emission limits and PM emission limits for Boiler #3 are based on data for boilers of similar size and age and firing #2 fuel oil.
3. The PM emission limit for Boiler #2 is regulated by 06-096 CMR 103. PM₁₀ emission limits for both boilers are based on their PM limits.

4. CO and VOC emission limits are based on AP-42 data dated 9/98 for #2 fired boilers smaller than 100 MMBtu/hr.
5. Visible emissions from Boilers #2 and #3 each shall not exceed 30% opacity on a 6-minute block average, except for no more than 2 six-minute block averages in a 3-hour period.

The current emission and fuel usage limitations were previously determined to represent BPT for the oil-fired boilers and continue to represent BPT for this equipment for the license renewal.

D. Boiler #4

Limington Lumber installed a wood-fired boiler in 2006. Air Emissions License Amendment, A-714-71-C-A, addressed its emissions and established BACT emission limits. This license renewal will incorporate those requirements as BPT.

Boiler #4 is a stoker boiler with a maximum heat input of 12.4 MMBtu/hr and will fire wood residue, including pine sawdust, chips and bark. The fuel mixture consists of approximately 90% green sawdust and bark with a moisture content of about 50 percent, and about 10% chipped board ends with a moisture content of about 8 percent. Dry shavings are sold for bedding and not used as fuel. Therefore, the typical heating value of the fuel mix is estimated at 50% moisture or 4,500 Btu/lb.

Particulate matter emissions from the boiler are controlled by two multiclones in series. NOx emissions are controlled through use of staged air combustion. Sulfur Dioxide (SO₂) emissions are limited through the use of wood as a fuel. CO and VOCs are controlled through good combustion techniques. Boiler #4 will exhaust to a forty-foot above ground level Stack #4. At this height the stack represents about 50% Good Engineering Practice (GEP) formula stack height.

New Source Performance Standards 40 CFR 60, Subpart Dc specifies emission standards, monitoring requirements and test methods for steam generating units greater than 10 MMBtu/hr and manufactured after June 9, 1989. Boiler #4 is subject to the requirements of Subpart Dc. Because the boiler is wood-fired, it is not subject to the SO₂ emissions standards specified in Subpart Dc. Boiler #4 is also less than 30 MMBtu/hr heat input capacity and is therefore not required to continuously monitor opacity or meet the PM emission standard. Boiler #4 is subject to the reporting and record keeping requirements as outlined in 40 CFR 60.48c and 60.7.

BPT for Boiler #4 is the following:

Pollutant	BPT Determination	Emission Factor
PM	Two multiclones in series	0.25 lb/MMBtu
SO ₂	Biomass fuel with inherent low sulfur	0.03 lb/MMBtu
NO _x	Staged air combustion	0.22 lb/MMBtu
CO	Good combustion techniques	0.6 lb/MMBtu
VOC	Good combustion techniques	0.04 lb/MMBtu

06-096 CMR 101 establishes opacity limits for emissions from several categories of air emission sources. Based on 06-096 CMR 101, Boiler #4 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.

E. Wood Drying

Limington Lumber operates a pre-dryer and a kiln for drying lumber. The pre-dryer was installed in 1981, while the wood-drying kilns were installed at various times beginning in 1995. Wood drying is a source of VOC emissions. Currently, pre-dryer and kiln throughput are limited to 16.1 million board feet per year based on a 12-month rolling total. VOC emissions from the wood drying equipment are calculated based on the Paper Industry NCASI study, dated 7/96 for measurement of volatile organic compound emissions from lumber drying. At an emission rate of 2.26 lb VOC/MBF, VOC emissions from wood drying at Limington were estimated to be 18.2 tons/year.

Limington Lumber has requested a minor revision to increase the allowable throughput by 2 million board feet to 18.1 million board feet per year. Utilizing the VOC emission factor of 2.26 pounds of VOC per 1000 board feet, potential VOC emissions from wood drying with the increase in allowable throughput will be 20.5 tons/year, resulting in an increase of 2.3 tons/year. Limington Lumber will remain a minor source of air emissions with this increase in potential VOC emissions.

The facility is not anticipating a significant increase in actual lumber production at this time and no changes are being proposed to the current wood drying equipment at the facility. The increase in potential throughput will allow additional operational flexibility to meet customer demand and sufficient margin to ensure compliance considering the normal variability in kiln production. The

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revised allowable throughput limitation of 18.1 million board feet per year and the associated allowable VOC emission limit of 20.5 tons/year constitute BPT for the wood drying equipment.

F. Annual Emissions

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

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

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Wood-Fired Boiler #1	3.8	3.8	0.4	2.8	7.7	0.5
Oil-Fired Boilers #2 and #3	2.1	2.1	8.8	5.3	0.7	0.1
Wood-Fired Boiler #4	13.6	13.6	1.6	11.9	32.5	2.1
Drying Kiln	--	--	--	--	--	20.5
Total TPY	19.5	19.5	10.8	20.0	40.9	23.2

III. AMBIENT AIR QUALITY ANALYSIS

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

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

Based on the above total facility emissions, Limington Lumber is below the emissions level required for modeling and monitoring.

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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-714-71-E-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

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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. [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.

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- 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. Boiler #1 shall fire wood waste. [06-096 CMR 115, BPT]
 B. Emissions from boiler #1 shall not exceed the following:

Boiler #1 Emission Limits

Pollutant	lb/hr
PM	0.9
PM ₁₀	0.9
SO ₂	0.1
NO _x	0.7
CO	1.8
VOC	0.1

[06-096 CMR 115, BPT]

- C. Emissions from boiler #1 shall be vented to a mechanical collector before entering stack #1. [06-096 CMR 115, BPT]
 D. Visible emissions from boiler #1 (stack #1) shall not exceed 30% opacity on a 6-minute block average, except for no more than 2 six-minute block averages in a 3-hour period. [06-096 CMR 101]
- (17) **Boilers #2 and #3**
 A. Boilers #2 and #3 are limited to a combined total of 250,000 gallons per year based on a 12-month rolling total of #2 fuel oil which meets the criteria in ASTM D396. Compliance shall be demonstrated through fuel use records and supplier receipts showing the sulfur content of the fuel. Records shall be

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maintained on a monthly and on a 12-month rolling total basis. [06-096
 CMR 115, BPT]

B. Emissions from Boilers #2 and #3 shall not exceed the following:

Boilers #2 and #3 Emission Limits

Pollutant	lb/MMBtu	Boiler #2 (lb/hr)	Boiler #3 (lb/hr)
PM	0.12	0.8	0.4
PM ₁₀	0.12	0.8	0.4
SO ₂	N/A	3.2	1.5
NO _x	N/A	1.9	0.9
CO	N/A	0.2	0.1
VOC	N/A	0.1	0.1

[06-096 CMR 115, BPT]

C. Visible emissions from each boiler shall not exceed 30% opacity on a 6-minute block average, except for no more than 2 six-minute block averages in a 3-hour period. [06-096 CMR 101]

(18) **Boiler #4**

A. Emissions from Boiler #4 shall not exceed the following: [06-096 CMR 115, BPT]

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #4	PM	0.25	MEDEP, Chapter 115, BACT

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

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #4	3.10	3.10	0.37	2.72	7.43	0.48

C. Emissions from Boiler #4 shall exhaust through two multiclones in series.
 [06-096 CMR 115, BPT]

D. Boiler #4 shall utilize staged air combustion and O₂ trim to reduce NO_x emissions.
 [06-096 CMR 115, BPT]

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- E. Visible emissions from Boiler #4 shall not exceed 30% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a continuous 3-hour period. [06-096 CMR 101]
- (19) **New Source Performance Standards** [40 CFR Part 60, Subpart Dc]
Boiler #4 is subject to Federal New Source Performance Standards, Subpart Dc. Limington Lumber shall comply with all requirements of 40 CFR Part 60, Subpart Dc including, but not limited to, the following:
- A. Limington Lumber shall record and maintain records of the amounts of each fuel combusted during each day.
 - B. Limington Lumber shall maintain records required by Subpart Dc for a period of two years following the date of such record.
 - C. The following address for EPA shall be used for any reports or notifications required to be copied to them:

Compliance Clerk
USEPA Region 1
1 Congress Street
Suite 1100
Boston, MA 02114-2023

- (20) **Wood Drying Kiln**
Yearly throughput is limited to 18.1 million board feet per year based on a 12-month rolling total. Compliance shall be demonstrated through kiln loading records. [06-096 CMR 115, BPT]
- (21) **Wood Kiln VOC emissions**
Limington Lumber shall limit VOC emissions from the wood kilns to less than 20.5 tons per year based on a 12-month rolling total. Limington shall use the following equations to determine compliance with the above emission limit:

$$\begin{aligned} \text{monthly VOC (pine)} &= (2.26 \text{ lb/1000 board feet}) * (X \text{ board feet of pine/month}) \\ \text{monthly VOC (non-pine)} &= (1.28 \text{ lb/1000 board feet}) * (X \text{ board feet of non-pine/month}) \end{aligned}$$

$$\text{Total monthly VOC in tons} = [\text{VOC (pine)} + \text{VOC (non-pine)}] / 2000$$

[06-096 CMR 115, BPT]

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(22) Limington Lumber 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).

(23) **Annual Emission Statement**

In accordance with Emission Statements, 06-096 CMR 137 (last amended July 6, 2004), 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.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted by July 1 or as otherwise specified in 06-096 CMR 137.

(24) **Air Toxics Emission Statement**

If Limington Lumber exceeds the thresholds for HAPs listed in Appendix A of 06-096 CMR 137 in an inventory year, in accordance with 06-096 CMR 137 the licensee shall report, no later than July 1 every three years (2005, 2008, 2011, etc.) or as otherwise stated in 06-096 CMR 137, the information necessary to accurately update the State's toxic air pollutants emission inventory in a format prescribed by the Department containing the information required in 06-096 CMR 137.

NOTE: Based on AP-42 emission factors for fuel burning equipment, Limington Lumber will most likely exceed the 06-096 CMR 137 thresholds of HAPs based on fuel burning alone should the facility exceed the firing of 250 tons of wood waste (50% moisture) in a calendar year.

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Reports and questions should be directed to:

Attn: HAP Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437 [06-096 CMR 137]

DONE AND DATED IN AUGUSTA, MAINE THIS 18th DAY OF December 2007.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brooks for
DAVID P. LITTELL, 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: July 19, 2007

Date of application acceptance: August 8, 2007

Date filed with the Board of Environmental Protection: _____

This Order prepared by Edwin Cousins, Bureau of Air Quality.

