

Louisiana-Pacific Corporation
Aroostook County
New Limerick, Maine
A-327-70-H-A

Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #7

After review of the Part 70 Major Modification 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

FACILITY	Louisiana-Pacific Corporation (LP)
INITIAL LICENSE NUMBER	A-327-70-A-I
LICENSE TYPE	Part 70 Major Modification
NAIC CODES	321219
NATURE OF BUSINESS	Oriented Strand Board Manufacturer
FACILITY LOCATION	240 Station Road, New Limerick, Maine
DATE OF INITIAL LICENSE ISSUANCE	December 19, 2000
DATE OF PART 70 MAJOR MODIFICATION	
LICENSE EXPIRATION DATE	December 19, 2005

B. Overview of Part 70 Major Modification

LP has requested a major modification to increase its OSB production limit from 518 tons per day to 600 tons per day; an approximate 16% increase. This increase will result in press CO annual emissions increasing, dry wafer storage bin and flying cut-off saw PM and VOC annual emissions increasing, spray booth VOC annual emissions increasing as well as overall facility HAP annual emission increasing. Also included in this request is the ability to install a heat exchanger in the Thermal Oil Heater (TOH) stack, revise the dryer fuel firing rate to correctly document the actual firing rate, and to revise the press SO₂ emission limit as a result of new emission factors published in AP-42. LP has also requested relaxation of the biennial NO_x stack testing requirement on the stacks serving the TOHs, dryer vent and press vent. Compliance Assurance Monitoring (CAM), as required by 40 CFR Part 64, is being addressed in this amendment for the ~~Thermal Oil Heaters, Core Line Dryer (for PM), Press, Surface Line Dryer (for PM), Dry Wafer Storage Bins (for PM) and the Flying Cut Off Saw (for PM).~~ CAM does not apply to the TOHs emissions due to being subject to 40 CFR Part 63, Subpart DDDDD (Boiler MACT). CAM does not apply to the Core Line Dryer, Surface Line Dryer or Press for VOC HAP emissions due to being subject to 40 CFR Part 63, Subpart DDDD (Plywood MACT).

Changes and improvements to non-licensed sources, such as the formers, blenders, saw lines, and green end, may also be completed as part of this project. These changes are expected to include an upgrade to the hood loader and the log handling equipment that feeds the waferizers, and replacement of the debarker and bark hog. The existing blenders will be replaced with new blenders, and wax, resin, glue, and air piping will be repiped to the new blenders. Because of the additional length of the new blenders, the surface and core infeed conveyors will also be replaced.

To allow for the increase in production, changes will also be made to the forming line to increase the speed of line which delivers mats to the press. Changes will be necessary to the following existing equipment: the forming line chain conveyor, speed up conveyor, reject gate, reject conveyor, loader hoist, loader boom, unloader hoist, unloader boom, triangle conveyor, return line, and unloader outfeed conveyor. PLC software changes will also be necessary, and any remaining DC drives will be changed out to AC frequency drives.

C. Application Classification

The application for LP includes increasing production, increasing SO₂ and CO short term emission limits for the press, relaxing biennial NO_x stack testing requirements, and increasing PM, SO₂, NO_x, CO, VOC and HAP annual emissions. There will be a significant net emissions increase in annual PM, NO_x, and CO emissions. Therefore, the license amendment is considered to be a Major Modification of a Part 70 source issued under Section 5 of Chapter 140 of the Department's regulations for a Part 70 source.

D. Thermal Oil Heaters

LP is licensed to operate two Thermal Oil Heaters (TOHs), which are used to heat the facility, hot ponds and to provide heated oil to the press. No physical changes are being proposed to the TOHs and no change is being proposed to the annual wood usage limit of 58,043 tons per year per (combined) in the TOHs or in the annual #2 fuel oil usage limit of 118,000 gallons per year (combined). LP has requested to be allowed to increase the annual waste oil usage limit from 3,500 gallons per year to 4,000 gallons per year. The short term emission limits will not change; the annual criteria pollutant emissions may increase slightly.

LP has requested to be allowed to install air-to-air heat exchangers in the ductwork of the TOH exhaust, downstream of the pollution control equipment. The heat exchangers would draw in outside air and preheat it using the exhaust gases of the TOHs. This warm air would then be vented into the main building to aid in heating the plant during the colder months of the year. The heat exchangers would not operate during the summertime. This installation will decrease the exhaust gas temperature during operation and slightly restrict flow. As such, the installation of the heat exchangers was accounted for in the air quality impact analysis.

Condition (36) of the initial Part 70 license allows LP to petition the DEP for removal of biennial NO_x stack testing requirements for the TOHs following two consecutive tests with passing results. Stack testing for NO_x was conducted in 2002 and 2004 during which compliance with the license limits was demonstrated. The stack test results are detailed below:

Stack	Year	Units	Average	License Limit
TOH	2004	lb/hr	5.7	9.5
		lb/MMBtu	0.21	0.33
	2002	lb/hr	5.3	9.5
		lb/MMBtu	0.15	0.33
Dryers	2004	lb/hr	10.3	32.9
	2002	lb/hr	7.3	32.9
Press	2004	lb/hr	1.9	20.5
	2002	lb/hr	6.9	20.5

As such, the biennial NO_x stack testing requirement for the TOHs has been changed to once per 5-year license term.

40 CFR Part 64—Compliance Assurance Monitoring (CAM) applicability

~~CAM applies to emission units located at a major source required to obtain a Part 70 permit in which the emissions unit is subject to an emission limitation, utilizes a control device to achieve that limitation and has precontrol emissions which are greater than the major source threshold for the controlled pollutant. The TOHs utilize multiclones and electrostatic precipitators (ESPs) to control PM emissions. The TOHs have the potential to emit greater than 100 tons per year each of PM prior to the control equipment and are not subject to 40 CFR Part 63, Subpart DDDDD due to not meeting the definition of boiler under 63.7575. As such, CAM applies to PM from the TOH.~~

PM-CAM:

	Indicator #1	Indicator #2
Indicator	ESP Secondary Voltage	ESP Primary and Secondary Current
General Criteria		
Measurement Method	A voltmeter or voltage sensor is used to monitor secondary voltage.	An ammeter or current sensor is used to measure current.
Indicator Range	The range maintained is based on information derived from previous stack tests. If the voltage drops below that range, it is considered an excursion. The TOH is shut down and trouble shooting is	Primary current is either on or off. If off, the ESP is not operating and the TOH is shut down. The secondary current range maintained is based on information derived from the previous stack tests. If the current is outside that range, it is considered an

	conducted on the ESP and air lock systems.	excursion. The system is shut down, the problem is identified, and corrective action is taken.
Performance Criteria		
Data Representativeness	Voltage is measured using the instrumentation the manufacturer provided with the ESP. The accuracy of the voltmeter or voltage sensor is $\pm 5\%$.	Current is measured using the instrumentation the manufacturer provided with the ESP. The accuracy of the ammeter or current sensor is $\pm 5\%$.
QA/QC	Confirm the meter or sensor reads zero when the unit is not operating. The voltmeter is calibrated annually. The computer controlled automatic voltage controller needs no calibration according to the manufacturer. Operator confirms that the meter or sensor reads in the appropriate range once per day.	Confirm the meter or sensor reads zero when the unit is not operating. The ammeter is calibrated annually. The computer controlled automatic voltage controller needs no calibration according to the manufacturer. Operator confirms that the meter or sensor reads in the appropriate range once per day.
Monitoring Frequency	Operator monitors equipment intermittently.	Operator monitors equipment intermittently.
Data Collection Procedure	Secondary voltage shall be recorded once per shift during operation.	Secondary current shall be recorded once per shift during operation.
Averaging Period	No average taken.	No average taken.

E. Core Line and Surface Line Dryers

LP operates two single-pass dryers; one core line dryer and one surface line dryer. Adjustments may be made to the dryer burners as part of the project, however these changes do not alter the maximum firing rate or change any short term emission limits. In the initial Part 70 license, the fuel firing rate for the dryers was inadvertently listed as 4.2 tons per hour. However, with a maximum heat input while firing wood of 44.0 MMBtu/hr and assuming an 8500 Btu/lb heating value (5.5% moisture) the maximum fuel firing rate is actually 2.6 tons per hour. As such, the annual wood fuel use for the dryers has been changed from 73,584 tons per year (combined) to 45,552 tons per year (5.5% moisture).

40 CFR Part 64 – CAM applicability

The core line and surface line dryers each utilize a cyclone and a wet ESP (WESP) to control PM emissions ~~and a regenerative thermal oxidizer (RTO) to control VOC emissions~~. The dryers have the potential to emit greater than 100 tons per year each of PM ~~and greater than 50 tons per year of VOC~~ prior to the control equipment. As such, CAM applies to PM ~~and VOCs~~ from the dryers.

PM CAM:

	Indicator #1	Indicator #2	Indicator #3
Indicator	WESP Secondary Voltage	WESP Secondary Current	Bake-out Visible Emissions
General Criteria			
Measurement Method	A voltmeter or voltage sensor is used to monitor secondary	An ammeter or current sensor is used to measure current.	Method 9 observations

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	voltage.		
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Indicator Range	An excursion is defined as a secondary voltage less than 30 kV DC, except during a flush. If the voltage drops below 30 kV, the dryer is shut down and the WESP is repaired.	The secondary current must be greater than 10 milliamps DC. If the current is below this threshold, it is considered an excursion. The system is shut down, the problem is identified, and corrective action is taken.	Opacity less than 30% during bake-outs. Excursions trigger trouble shooting, corrective action, and reporting requirements.
Performance Criteria			
Data Representativeness	Voltage is measured using the instrumentation the manufacturer provided with the WESP. The accuracy of the voltmeter or voltage sensor is $\pm 5\%$.	Current is measured using the instrumentation the manufacturer provided with the WESP. The accuracy of the ammeter or current sensor is $\pm 5\%$.	Observations are performed at the RTO exhaust midway through the bake-out process.
QA/QC	Confirm the meter reads zero when the unit is not operating. Operator confirms that the meter reads in the appropriate range once per day.	Confirm the meter reads zero when the unit is not operating. Operator confirms that the meter reads in the appropriate range once per day.	The observer will have passed Method 9 certification training once within the past 18 months.
Monitoring Frequency	Operator monitors voltage intermittently.	Operator monitors voltage intermittently.	VE recorded midway through the bake-out process.
Data Collection Procedure	Secondary voltage recorded once per shift during operation.	Secondary current recorded once per shift during operation.	Readings taken every 15 seconds for at least 18 minutes.
Averaging Period	No average taken.	No average taken.	6 minute averages.

VOC CAM:

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
Indicator	RTO Combustion Chamber Temperature	RTO Outlet Air Flow	RTO Inlet Pressure	Position of RTO Isolation Damper
General Criteria				
Measurement Method	Temperature is monitored with thermocouples.	Air flow is monitored with an outlet flow monitor.	Pressure is monitored with an inlet pressure sensor.	Position of the isolation damper is determined with damper position indicators.
Indicator Range	Temperatures are maintained above the minimum one hour average temperatures at which compliance was demonstrated during emissions testing. If the one hour average temperature drops below this threshold, the system is shut down until the problem is identified and	Outlet air flows are maintained below the maximum air flow at which compliance was demonstrated during emissions testing. If the air flow is above this threshold, the system is shut down until the problem is identified and repairs are completed. The excursion is	The pressure must be less than or equal to zero (i.e., not positive pressure). If the pressure is above this threshold, the system is shut down until the problem is identified and repairs are completed.	The isolation damper must be open while the dryers are operating. If closed, the RTO is off line and not controlling emissions from the dryers.

		repairs are completed. The excursion is reported.	reported.		
Performance Criteria					
Data Representativeness		Thermocouples installed in combustion chamber per manufacturer's design. Thermocouples are accurate within ±2%.	Airflow monitor is installed in a location which provides representative volumetric flow measurements. Flow monitor is accurate within ±10%.	Inlet pressure sensor is installed such that it provides representative pressure indications over the anticipated operating conditions. The pressure sensor is accurate within ±10% or 2 inches of water, whichever is greater.	-Damper position indicators identify if the isolation damper is open or closed. Accuracy is not applicable. Confirm isolation damper indicators read correctly every 6 months.
QA/QC		Temperature readouts are checked against each other. All indicators must remain within ±50°F of each other. Annual calibrations are performed in accordance with manufacturer recommendations.	Annual calibrations are performed in accordance with manufacturer recommendations. Accuracy is checked during biennial stack testing.	Annual calibrations are performed in accordance with manufacturer recommendations.	Not applicable.
Monitoring Frequency		Temperature is measured continuously.	Air flow is measured continuously.	Inlet pressure is measured continuously.	The position of the isolation damper is monitored continuously.
Data Collection Procedure		Temperature is recorded every 15 minutes using an automatic data logger.	Air flow is recorded every 15 minutes using an automatic data logger.	Inlet pressure is recorded hourly.	The position of the isolation damper is recorded hourly. Opening and closing of the damper is recorded.
Averaging Period		1 hour	1 hour	No average is taken.	Not applicable.

F. Press

LP operates one hydraulic press and has requested an increase in the allowable production rate from 518 tons per day to 600 tons per day (an approximately 16% increase), on a seven-day average basis. VOC emissions are controlled by means of a thermal oxidizer which operates as a regenerative thermal oxidizer (RTO) or a regenerative catalytic oxidizer (RCO).

No changes are being proposed to the current lb/hr emission limits for PM, NO_x, or VOCs. A new SO₂ emission factor for OSB presses has become available through AP-42 dated March, 2002. As a result, LP has requested the short term SO₂ emission factor from 0.2 lb/hr to 1.5 lb/hr. LP is also proposing to revise the short-term CO emission limit for the press be increased as well. The current limit is 8.2 lb/hr when operating the oxidizer as an RCO and 8.3 lb/hr when operating the oxidizer as an RTO. As a result of the 16% increase in production, the short-

term CO emission rates for the RCO and RTO will be increased 16% to 9.5 lb/hr and 9.6 lb/hr, respectively. LP will perform a stack test on the press ~~within no later than~~ 90 days ~~of reaching after production first exceeds 600-550 tons per day~~ on a seven-day average ~~basis for six consecutive weeks~~ to verify the revised SO₂ and CO emission rates are ~~correct~~.

With the proposed short-term SO₂ and CO emission limit increases, the potential annual SO₂ and CO emissions from the press will increase as well. SO₂ emissions from the press will increase further due to the revised AP-42 emission factor. Potential SO₂ emissions will increase from 0.88 tons/year to 6.58 tons/year and potential CO emissions will increase from 36.35 tons/year to 42.0 tons/year.

40 CFR Part 64—CAM applicability

~~The press utilizes an RTO/RCO to control VOC emissions. The press has the potential to emit greater than 50 tons per year of VOC prior to the control equipment. As such, CAM applies to VOCs from the press.~~

VOC CAM:

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
Indicator	RCO Combustion Chamber Temperature	RCO Outlet Air Flow	RCO Inlet Pressure	Position of RCO Isolation Damper
General Criteria				
Measurement Method	Temperature is monitored with thermocouples.	Air flow is monitored with an outlet flow monitor.	Pressure is monitored with an inlet pressure sensor.	Position of the isolation damper is determined with damper position indicators.
Indicator Range	Temperatures are maintained above the minimum one-hour average temperatures at which compliance was demonstrated during emissions testing. If the one-hour average temperature drops below this threshold, the system is shut down until the problem is identified and repairs are completed. The excursion is reported.	Outlet air flows are maintained below the maximum air flow at which compliance was demonstrated during emissions testing. If the air flow is above this threshold, the system is shut down until the problem is identified and repairs are completed. The excursion is reported.	The pressure must be less than or equal to zero (i.e., not positive pressure). If the pressure is above this threshold, the system is shut down until the problem is identified and repairs are completed.	The isolation damper must be open while the press is operating. If closed, the RCO is off-line and not controlling emissions from the press.
Performance Criteria				
Date Representativeness	Thermocouples installed in combustion chamber per manufacturer's design. Thermocouples are accuracy within ±2%.	Airflow monitor is installed in a location which provides representative volumetric flow measurements. Flow	Inlet pressure sensor is installed such that it provides representative pressure indications over the anticipated operating conditions.	Damper position indicators identify if the isolation damper is open or closed. Accuracy is not applicable. Confirm

			monitor is accurate within $\pm 10\%$.	The pressure sensor is accurate within $\pm 10\%$ or 2 inches of water, whichever is greater.	isolation damper indicators read correctly every 6 months.
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QA/QC	Temperature readouts are checked against each other. All indicators must remain within $\pm 50^{\circ}\text{F}$ of each other. Annual calibrations are performed in accordance with manufacturer recommendations.	Annual calibrations are performed in accordance with manufacturer recommendations. Accuracy is checked during biennial stack testing.	Annual calibrations are performed in accordance with manufacturer recommendations.	Not applicable.
Monitoring Frequency	Temperature is measured continuously.	Air flow is measured continuously.	Inlet pressure is measured continuously.	The position of the isolation damper is monitored continuously.
Data Collection Procedure	Temperature is recorded every 15 minutes using an automatic data logger.	Air flow is recorded every 15 minutes using an automatic logger.	Inlet pressure is recorded hourly.	The position of the isolation damper is recorded hourly. Opening and closing of the damper is recorded.
Averaging Period	1-hour	1-hour	No average is taken.	Not applicable.

G. Dry Wafer Storage Bins

LP utilizes a baghouse to control PM emissions from the dry wafer storage bins. This baghouse vents outside the building. No changes are being proposed to the dry wafer storage bins. However, PM and VOC emissions from this source may increase as a result of the increased production. Therefore, LP has requested an increase in the licensed allowable emission limits by 16% for these two pollutants. PM emissions will increase from 0.1 to 0.12 lb/hr and VOC emissions will increase from 2.7 tons/year to 3.1 tons per year.

40 CFR Part 64 – CAM applicability

LP utilizes a baghouse to control PM emissions ~~from, but has no control device for VOCs. CAM does not apply to VOC emissions from the baghouse.~~ The ~~the~~ dry wafer storage bins which have the potential to emit greater than 100 tons per year of PM prior to the control equipment. As such, CAM applies to PM from the dry wafer storage bins.

PM CAM:

	Indicator #1	Indicator #2
Indicator	Pressure Drop	Inspection/Maintenance
General Criteria		
Measurement Method	Pressure drop across the baghouse is measured with a differential pressure gauge.	Inspections each shift. Maintenance is performed as needed.
Indicator Range	The indicator range is a pressure drop between 0 and 5 inches of water. If the	Not applicable.

	pressure drop is high, the bags are changed out at the next maintenance period.	
Performance Criteria		
Data Representativeness	The pressure drop across the baghouse is measured on either side of the bags (inlet and outlet). The accuracy of the pressure gauge is 3%.	Inspections performed at the baghouse.
QA/QC	The pressure gauge is replaced if it does not read properly. The pressure taps are checked quarterly for plugging. The cleaning cycle is initiated whenever there is downtime on the system.	Qualified personnel perform inspections.
Monitoring Frequency	Pressure drop is monitored intermittently.	Inspection once per shift.
Data Collection Procedure	Pressure drop is manually recorded once per shift.	Records are maintained to document inspections and any required maintenance.
Averaging Period	No average taken.	Not applicable.

H. Flying Cut-off Saw

LP utilizes a baghouse to control PM emissions from the flying cut-off saw. This baghouse vents outside the building. No changes are being proposed to the flying cut-off saw. However, PM and VOC emissions from this source may increase as a result of the increased production. Therefore, LP has requested an increase in the licensed allowable emission limits by 16% for these two pollutants. PM emissions from the flying cut-off saw will increase from 0.5 to 0.58 lb/hr and VOC emissions will increase from 7.4 tons/year to 8.6 tons per year.

40 CFR Part 64 – CAM applicability

LP utilizes a baghouse to control PM emissions ~~from but has no control device for VOCs. CAM does not apply to VOC emissions from the baghouse.~~ The flying cut-off saw which has the potential to emit greater than 100 tons per year of PM prior to the control equipment. As such, CAM applies to PM from the flying cut-off saw.

PM CAM:

	Indicator #1	Indicator #2
Indicator	Pressure Drop	Inspection/Maintenance
General Criteria		
Measurement Method	Pressure drop across the baghouse is measured with a differential pressure gauge.	Inspections each shift. Maintenance is performed as needed.
Indicator Range	The indicator range is a pressure drop between 0 and 5 inches of water. If the pressure drop is high, the bags are changed out at the next maintenance period.	Not applicable.
Performance Criteria		
Data	The pressure drop across the baghouse is	Inspections performed at the baghouse.

Representativeness	measured on either side of the bags (inlet and outlet). The accuracy of the pressure gauge is +/- 3%.	
QA/QC	The pressure gauge is replaced if it does not read properly. The pressure taps are checked quarterly for plugging. The cleaning cycle is initiated whenever there is downtime on the system.	Qualified personnel perform inspections.
Monitoring Frequency	Pressure drop is monitored intermittently.	Inspection once per shift.
Data Collection Procedure	Pressure drop is manually recorded once per shift.	Records are maintained to document inspections and any required maintenance.
Averaging Period	No average taken.	Not applicable.

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I. Spray Booths

No changes will be made to the spray booths. However, the 16% production increase may result in an increase in edgeseal usage. VOC emissions from the application of edgeseal in the two spray booths combined will increase from 2.5 tons/year to 2.9 tons per year.

J. Hazardous Air Pollutants

Due to the above mentioned changes, HAP emissions will increase from 39.68 tons/year to 45.36 tons/year. The HAP equation for demonstrating compliance has been revised.

K. Revised Facility Emissions

The following total licensed annual emissions for the facility are based on the following raw materials used. All usages are based on a 12 month rolling total.

- 58,043 tons per year of biomass (4,090 Btu/lb, 54.5% moisture) in the Thermal Oil Heaters, or equivalent.
- 118,000 gallons per year of #2 fuel oil (0.3% sulfur by weight) in the Thermal Oil Heaters.
- 4,000 gallons per year of specification waste oil (0.7% sulfur by weight) in the Thermal Oil Heaters.
- 1,258,085 gallons of liquid propane or 114,815,534 cubic feet of natural gas in the RTO for the Line Dryers (based on 8760 hours/year).
- 45,552 tons per year of biomass (8,500 Btu/lb, 5.5% moisture) in the Line Dryers, or equivalent.
- 75,000 gallons per year of #2 fuel oil (0.3% sulfur by weight) in the Line Dryers.
- 1,043,745 gallons of liquid propane or 95,254,369 cubic feet of natural gas in the RTO/RCO for the Press Vent (based on 8760 hours/year).
- 219,000 tons of finished product per year.
- Diesel Fire pump fuel use of 4,286 gallons per year of diesel fuel (0.05% sulfur by weight).

Total Annual Emissions for the Facility
(used to calculate the license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	Total HAPs*
Thermal Oil Heaters (wood)	35.61	35.61	5.93	78.34	466.91	15.82	1.45
Thermal Oil Heaters (#2 FO)	1.24	1.24	2.56	2.73	0.30	0.04	0.01
Thermal Oil Heaters (Waste Oil)	0.04	0.04	0.21	0.09	0.01	0.01	0.06
Dryers through RTO (wood)	68.34	68.34	1.84	144.19	479.43	24.67	24.97
Dryers through RTO (oil)	0.63	0.63	1.60	2.51	0.19	0.02	--
Press as RTO	53.87	53.87	6.68	89.77	42.04	7.67	7.23
Dry Wafer Storage Bins	0.53	0.53	--	--	--	3.12	3.12
Flying Cut-Off Saw	2.54	2.54	--	--	--	8.55	8.54
Spray Booths	--	--	--	--	--	2.90	--
Diesel Engine	0.09	0.09	0.02 [MER2]	1.32	0.29	0.11	--
Total TPY	162.9	162.9	18.8	319.0	989.2	62.9	45.4

*HAPs included are: Lead, Arsenic, Benzene, Acetaldehyde, Acrolein, Formaldehyde, Methanol and Phenol

II. Ambient Air Quality Analysis

A. Overview

A refined modeling analysis was performed to demonstrate that emissions from LP, in conjunction with other area sources, will not cause or contribute to violations of Maine Ambient Air Quality Standards (MAAQS) for SO₂, PM₁₀, NO₂ or CO or to Class II SO₂, PM₁₀ and NO₂ increment standards.

Based upon the distance from LP to the nearest Class I area (121 kilometers) and the magnitude of emissions increase, the affected Federal Land Managers (FLMs) and MEDEP-BAQ have determined that an assessment of Class I Air Quality Related Values (AQRVs) is not required.

B. Model Inputs

The ISCST3 model was used in refined simple terrain mode to address standards and increments in all areas. In addition, the VALLEY screening mode of the COMPLEX-I model (CI-VM) was used to evaluate impacts in intermediate and

complex terrain, i.e., areas where terrain elevations exceed the proposed stack-top elevations.

All modeling was performed in accordance with all applicable requirements of the Maine Department of Environmental Protection, Bureau of Air Quality (MEDEP-BAQ) and the United States Environmental Protection Agency (USEPA).

A valid 5-year hourly meteorological off-site database was used for the refined modeling. The wind data was collected at a height of 10.00 meters at the Caribou National Weather Service station meteorological site during the 5-year period 1985-1989. Missing data were interpolated or coded as missing. Surface data collected at Loring Air Force Base were substituted for missing data. Hourly cloud cover, ceiling height and surface wind speed from Caribou NWS were used to calculate stability. Hourly mixing heights were derived from surface and upper air data collected at Caribou NWS station.

Point-source parameters, used in the modeling for LP and other nearby sources, are listed in Table II-1. The modeling analysis accounted for the potential of building wake effects on emissions from all modeled stacks that are below their respective formula GEP stack heights.

TABLE II-1 : Point Source Stack Parameters

<u>Facility/Stack</u>	<u>Stack Base Elevation (m)</u>	<u>Stack Height (m)</u>	<u>GEP Stack Height (m)</u>	<u>Stack Diameter (m)</u>	<u>UTM Easting NAD27 (km)</u>	<u>UTM Northing NAD27 (km)</u>
<u>CURRENT</u>						
<u>Louisiana-Pacific</u>						
<u>Thermal Oil Heaters</u>	<u>122.53</u>	<u>30.48</u>	<u>49.53</u>	<u>1.30</u>	<u>580.738</u>	<u>5106.454</u>
<u>Dryers</u>	<u>122.53</u>	<u>30.48</u>	<u>49.53</u>	<u>2.08</u>	<u>580.770</u>	<u>5106.518</u>
<u>Press</u>	<u>122.53</u>	<u>30.48</u>	<u>39.62</u>	<u>1.93</u>	<u>580.902</u>	<u>5106.474</u>
<u>AE Staley</u>						
<u>Main Stack (Boilers)</u>	<u>121.90</u>	<u>27.70</u>	<u>37.34</u>	<u>0.76</u>	<u>586.344</u>	<u>5106.239</u>
<u>Flash Dryer</u>	<u>121.90</u>	<u>18.30</u>	<u>37.34</u>	<u>1.30</u>	<u>586.319</u>	<u>5106.280</u>
<u>Houlton Regional Hospital</u>						
<u>Main Stack</u>	<u>118.26</u>	<u>16.15</u>	<u>27.43</u>	<u>0.96</u>	<u>589.205</u>	<u>5109.318</u>
<u>CURRENT ACTUALS (BASED ON FUEL USE DATA)</u>						
<u>AE Staley</u>						
<u>Main Stack (Boilers)</u>	<u>121.90</u>	<u>27.70</u>	<u>37.34</u>	<u>0.76</u>	<u>586.344</u>	<u>5106.239</u>
<u>1987 BASELINE</u>						
<u>Louisiana-Pacific</u>						
<u>Thermal Oil Heaters</u>	<u>122.53</u>	<u>30.48</u>	<u>48.01</u>	<u>1.30</u>	<u>580.738</u>	<u>5106.454</u>
<u>Dryers</u>	<u>122.53</u>	<u>30.48</u>	<u>48.01</u>	<u>1.07</u>	<u>580.729</u>	<u>5106.490</u>
<u>AE Staley</u>						
<u>Main Stack (Boilers)</u>	<u>121.90</u>	<u>18.30</u>	<u>37.34</u>	<u>0.76</u>	<u>586.344</u>	<u>5106.239</u>

<u>Houlton Regional Hospital</u>							
It has been determined by MEDEP that Houlton Regional Hospital does not consume NO _x increment							
<u>1977 BASELINE</u>							
<u>Louisiana-Pacific</u>							
All LP sources built after 1977 baseline year, no credit to be taken							
<u>AE Staley</u>							
Main Stack (Boilers)	121.90	7.60	37.34	0.71	586.344	5106.239	
<u>Houlton Regional Hospital</u>							
It has been determined by MEDEP that Houlton Regional Hospital does not consume SO ₂ or PM ₁₀ increment							

Emission parameters for LP and other nearby sources for MAAQS and increment modeling are listed in Table II-2. For the purposes of determining PM₁₀ and NO₂ impacts, all PM and NO_x emissions were conservatively assumed to convert to PM₁₀ and NO₂, respectively.

TABLE II-2 : Stack Emission Parameters

Facility/Stack	Averaging Periods	SO ₂ (g/s)	PM ₁₀ (g/s)	NO ₂ (g/s)	CO (g/s)	Stack Temp (K)	Stack Velocity (m/s)
<u>MAXIMUM LICENSE ALLOWED</u>							
<u>Louisiana-Pacific</u>							
<u>Maximum Load Case #2</u>							
Thermal Oil Heaters	All	0.78	1.02	2.39	13.43	408.15	8.56
Dryers	All	2.67	1.97	4.15	13.73	404.26	8.74
Press	All	0.19	1.55	2.58	1.21	344.26	16.78
<u>Typical Winter Case #2</u>							
Thermal Oil Heaters	All	0.67	0.87	2.04	11.42	408.15	7.28
Dryers	All	2.40	1.76	3.73	12.36	404.26	7.87
Press	All	0.18	1.40	2.33	1.08	344.26	15.10
<u>AE Staley</u>							
Main Stack (Boilers)	All	13.63	0.97	3.25		450.00	16.15
Flash Dryer	All		0.52			319.30	4.30
<u>Houlton Regional Hospital</u>							
Main Stack	All	2.82	0.45	2.52		450.00	8.68
<u>CURRENT ACTUALS (BASED ON FUEL USE DATA)</u>							
<u>AE Staley</u>							
Main Stack (Boilers)	All	3.81	0.27	0.91		450.00	4.53
<u>BASELINE – 1987</u>							
<u>Louisiana-Pacific</u>							
Thermal Oil Heaters	All			0.89		561.00	26.40
Dryers	All			1.16		383.00	10.38
<u>AE Staley</u>							
Main Stack (Boilers)	All			0.35		450.00	2.35
<u>Houlton Regional Hospital</u>							
It has been determined by MEDEP that Houlton Regional Hospital does not consume NO _x increment							

BASELINE – 1977							
<u>Louisiana-Pacific</u>							
All LP sources built after 1977 baseline year, no credit to be taken							
<u>AE Staley</u>							
Main Stack (Boilers)	All	3.69	0.24			450.00	4.55
<u>Houlton Regional Hospital</u>							
It has been determined by MEDEP that Houlton Regional Hospital does not consume SO ₂ or PM ₁₀ increment							

Key: Shaded areas = not modeled

C. Single Source Modeling Impacts

ISCST3 refined modeling, using the latest year of meteorological data (1989), and CI-VM screening modeling was performed for 5 LP load cases that represented 2 maximum, 2 typical and 1 minimum operating scenarios. ISCST3 refined modeling, using 5 years of off-site meteorological data, and CI-VM screening modeling was then performed for the worst-case operating scenarios, as determined by the single-year ISCST3 modeling. Two load cases were examined further: maximum load case #2 (Max #2) and typical winter case #2 (Typical #2).

The model results for LP alone, in both simple and complex terrain, are shown in Tables II-3 and II-4, respectively. Maximum predicted impacts that exceed their respective significance level are indicated in boldface type. No further modeling was required for pollutant/terrain combinations that did not exceed their respective significance levels.

TABLE II-3 : Maximum ISCST3 Simple Terrain Impacts from LP Alone

<u>Pollutant</u>	<u>Averaging Period</u>	<u>Max Impact (µg/m³)</u>	<u>Receptor UTM E (km)</u>	<u>Receptor UTM N (km)</u>	<u>Receptor Elevation (m)</u>	<u>Operating Scenario</u>	<u>Class II Significance Level (µg/m³)</u>
SO ₂	3-hour	73.07	580.800	5106.600	128.02	Max #2	25
	24-hour	24.56	580.800	5106.600	128.02	Typical #2	5
	Annual	2.48	580.844	5106.436	122.53	Max #2	1
PM ₁₀	24-hour	21.18	580.800	5106.600	128.02	Typical #2	5
	Annual	2.45	581.400	5105.800	146.30	Max #2	1
NO ₂	Annual	5.11	581.400	5105.800	146.30	Max #2	1
CO	1-hour	898.79	580.800	5106.600	128.02	Max #2	2000
	8-hour	435.46	580.800	5106.600	128.02	Max #2	500

TABLE II-4 : Maximum CI-VM Complex Terrain Impacts from LP Alone

<u>Pollutant</u>	<u>Averaging Period</u>	<u>Max Impact</u> ($\mu\text{g}/\text{m}^3$)	<u>Receptor UTM E</u> (km)	<u>Receptor UTM N</u> (km)	<u>Receptor Elevation</u> (m)	<u>Operating Scenario</u>	<u>Class II Significance Level</u> ($\mu\text{g}/\text{m}^3$)
SO ₂	3-hour	39.22	582.650	5105.165	198.12	Max #2	25
	24-hour	10.90	582.650	5105.165	198.12	Max #2	5
	Annual	3.49	582.650	5105.165	198.12	Max #2	1
PM ₁₀	24-hour	14.01	582.630	5105.180	195.07	Max #2	5
	Annual	4.48	582.630	5105.180	195.07	Max #2	1
NO ₂	Annual	8.99	582.630	5105.180	195.07	Max #2	1
CO	1-hour	346.40	582.630	5105.180	195.07	Max #2	2000
	8-hour	242.48	582.630	5105.180	195.07	Max #2	500

D. Combined Source Modeling Impacts

Since maximum predicted modeled impacts from LP alone exceeded significance levels, as indicated in Tables II-3 and II-4, other sources not explicitly included in the modeling analysis must be accounted for by using representative background concentrations for the area.

Background concentrations, listed in Table II-5, are derived from representative Northern Maine rural background data.

TABLE II-5 : Background Concentrations

<u>Pollutant</u>	<u>Averaging Period</u>	<u>Background Concentration</u> ($\mu\text{g}/\text{m}^3$)	<u>Date</u>
SO ₂	3-hour	24	2003 ¹
	24-hour	13	
	Annual	5	
PM ₁₀	24-hour	32	2001 ¹
	Annual	10	1999 ¹
NO ₂	Annual	11	1995 ²

Notes:

¹ Robinson Site, Easton

² TLSP site, Cape Elizabeth

MEDEP-BAQ identified other sources whose impacts would potentially be significant in LP's significant impact area. Other sources explicitly included in the combined source modeling analysis were: AE Staley and Houlton Regional Hospital.

Table II-6 summarizes maximum combined source SO₂, PM₁₀, and NO₂ impacts. The higher of the simple or complex terrain maximum predicted impacts are added to the conservative background concentrations to demonstrate compliance

with MAAQS. All combined source impacts for all pollutant/averaging periods were below their respective MAAQS. Because the predicted impacts using this method meet MAAQS, no further MAAQS modeling for LP needed to be performed.

TABLE II-6 : Maximum Combined Sources Impacts

<u>Pollutant</u>	<u>Averaging Period</u>	<u>Max Impact (µg/m³)</u>	<u>Receptor UTM E (km)</u>	<u>Receptor UTM N (km)</u>	<u>Receptor Elevation (m)</u>	<u>Operating Scenario</u>	<u>Back-Ground (µg/m³)</u>	<u>Max Total Impact (µg/m³)</u>	<u>MAAQS (µg/m³)</u>
SO ₂	3-hour	334.30	589.150	5109.250	121.92	Max #2	24	358.30	1150
	24-hour	118.51	586.500	5106.000	128.02	Max #2	13	131.51	230
	Annual	15.83	586.500	5106.000	128.02	Max #2	5	20.83	57
PM ₁₀	24-hour	42.15	586.304	5106.366	121.92	Typical #2	32	74.15	150
	Annual	5.32	586.374	5106.210	121.92	Max #2	10	15.32	40
NO ₂	Annual	8.99	582.630	5105.180	195.07	Max #2	11	19.99	100

E. Increment

LP's maximum increment impacts were predicted using the ISCST3 refined model in simple terrain and CI-VM screening model in complex terrain. For addressing increment impacts in intermediate terrain (i.e., terrain above stack top and below plume centerline), the ISCST3 and CI-VM models were run individually, and the higher of the two increment impacts chosen, per EPA Model Clearinghouse guidance Memo #77.

LP sources were conservatively modeled at their maximum licensed allowed emission rates, with no credit allowed for current-actual emissions based on recent fuel use data. Since LP was built after 1977 and before 1987, LP could only take credit for emissions sources that existed in the NO₂ baseline year (1987).

Results of the single and combined source Class II increment analyses are shown in Tables II-7 and II-8, respectively. All predicted increment impacts were below all increment standards. Because all predicted increment impacts meet increment standards, no further Class II SO₂, PM₁₀ and NO₂ increment modeling needed to be performed.

TABLE II-7 : Class II Increment Consumption – LP Alone

<u>Pollutant</u>	<u>Averaging Period</u>	<u>Max Impact (µg/m³)</u>	<u>Receptor UTM E (km)</u>	<u>Receptor UTM N (km)</u>	<u>Receptor Elevation (m)</u>	<u>Class II Increment (µg/m³)</u>
SO ₂	3-hour	73.07	580.800	5106.600	128.02	512
	24-hour	24.17	580.800	5106.600	128.02	91
	Annual	3.49	582.650	5105.165	198.12	20
PM ₁₀	24-hour	21.11	580.800	5106.600	128.02	30
	Annual	4.48	582.630	5105.180	195.07	17
NO ₂	Annual	6.99	582.630	5105.180	195.07	25

TABLE II-8 : Class II Increment Consumption – Combined Source

<u>Pollutant</u>	<u>Averaging Period</u>	<u>Max Impact (µg/m³)</u>	<u>Receptor UTM E (km)</u>	<u>Receptor UTM N (km)</u>	<u>Receptor Elevation (m)</u>	<u>Class II Increment (µg/m³)</u>
SO ₂	3-hour	73.07	580.800	5106.600	128.02	512
	24-hour	24.17	580.800	5106.600	128.02	91
	Annual	3.49	582.650	5105.165	198.12	20
PM ₁₀	24-hour	21.11	580.800	5106.600	128.02	30
	Annual	4.48	582.630	5105.180	195.07	17
NO ₂	Annual	6.99	582.630	5105.180	195.07	25

Federal guidance and Chapter 140 of MEDEP regulations require that any major source undergoing a major modification provide additional analyses of impacts that would occur as a direct result of the general, commercial, residential, industrial and mobile-source growth associated with the construction and operation of that source.

GENERAL GROWTH: Very minimal increases in local emissions due to construction related activities are expected to occur, as the proposed modification will involve relatively minor general construction. Increases in potential emissions of NO_x due to increased traffic to the mill will be minimal, as there will be an insignificant increase in truck traffic in and out of the facility (transporting raw materials, finished product, etc). Fugitive PM emissions (if any) will be minimized by the use of “Best Management Practices”.

RESIDENTIAL, COMMERCIAL AND INDUSTRIAL GROWTH: Population growth in the impact area of a proposed source can be used as a surrogate factor for the growth in emissions from combustion sources. Since the population in Aroostook County has declined approximately 15% since the minor source baseline date was established and the modification is not expected to create any new jobs, no new significant residential, commercial and industrial growth will follow from the modification associated with this source.

MOBILE SOURCE AND AREA SOURCE GROWTH: Since area and mobile sources are considered minor sources of NO₂, their contribution to increment has to be evaluated. Technical guidance from the Environmental Protection Agency points out that screening procedures can be used to determine whether additional detailed analyses of minor source emissions are required. Compiling a minor source inventory may not be required if it can be shown that little or no growth has taken place in the impact area of the proposed source since the baseline date (February 8, 1988) was established. Emissions during the calendar year 1987 are used to determine baseline emissions. As stated previously, the population in Aroostook County has declined approximately 15% since the minor source baseline date was established, therefore, no further assessment of additional area source growth of NO₂ increment is needed.

Any emissions associated with the minimal increases in vehicle miles traveled have been more than offset by decreases in NO_x emissions in terms of reduced average grams-per-vehicle-mile emission rates since the minor source baseline date was established. Therefore, no increase in actual NO_x emissions from mobile sources is expected. No further detailed analyses of mobile NO₂ emissions are needed.

F. Class I Impacts

Based upon the distance from LP to the nearest Class I area (121 kilometers) and the magnitude of emissions increase, the affected Federal Land Managers (FLMs) and MEDEP-BAQ have determined that an assessment of Class I Air Quality Related Values (AQRVs) is not required.

G. Summary

In summary, it has been demonstrated that LP in its proposed configuration will not cause or contribute to a violation of any SO₂, PM₁₀, NO₂ or CO averaging period MAAQS or any SO₂, PM₁₀ or NO₂ averaging period Class II increment standards.

ORDER

The following conditions and statements replace all previous conditions from all other licenses and amendments except for Condition (53) of license A-327-70-A-I, stating the expiration date of the license.

The Department hereby grants Part 70 Major Modification A-327-70-H-A, subject to Condition (53) of Part 70 License A-327-70-A-I, and the following Conditions and Statements:

STANDARD STATEMENTS

- (1) 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; [MEDEP Chapter 140]
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [MEDEP Chapter 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [MEDEP Chapter 140]
- (4) 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; [MEDEP Chapter 140]

- (5) Notwithstanding any other provision 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. [MEDEP Chapter 140]
- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
- A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee ~~in an application dated October, 1999.~~

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
a.	<u>Thermal Oil Heater #1 and #2 Louisiana-Pacific</u>	40 CFR Part 60, Subpart Dc	Standards of Performance for New Stationary Sources	Thermal Oil heaters #1 and #2 were Constructed prior to June 9, 1989; not modified or reconstructed after June 9, 1989.
b.	<u>Thermal Oil Heater #1 and #2</u>	<u>40 CFR Part 64</u>	<u>Compliance Assurance Monitoring</u>	<u>Thermal Oil Heater #1 and #2 are subject to 40 CFR Part 63, Subpart DDDDD (Boiler MACT)</u>
c.	<u>Dryer RTO, Press RTO, Core Line Dryer and Surface Line Dryer</u>	40 CFR Part 60, Subpart Dc	Standards of Performance for New Stationary Sources	Dryer RTO, Press RTO, Core Line Dryer and Surface Line Dryer These are not "steam generating units" <u>as defined in 40 CFR Part 60, Subpart Dc.</u>

**Louisiana-Pacific Corporation
Aroostook County
New Limerick, Maine
A-327-70-H-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #7**

	Louisiana-Pacific			
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	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
<u>d.</u>	Dryer VOC HAP emissions	40 CFR Part 64	Compliance Assurance Monitoring	Dryer organic HAP emissions are subject to 40 CFR Part 63, Subpart DDDD (Plywood MACT)
<u>e.</u>	Press VOC HAP Emissions	40 CFR Part 64	Compliance Assurance Monitoring	Press organic HAP emissions are subject to 40 CFR Part 63, Subpart DDDD (Plywood MACT)
<u>f.</u>	Louisiana-Pacific	40 CFR Part 63, Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins	Facility does not produce Group I polymers or resins.
<u>g.</u>	Louisiana-Pacific	40 CFR Part 63, Subpart W	National Emission Standards for Hazardous Air Pollutant Emissions for Epoxy Resins Production and Non-Nylon Polyamides Production.	Facility does not produce epoxy resins or non-nylon polyamides.
<u>h.</u>	Louisiana-Pacific	40 CFR Part 63, Subpart JJ	National Emission Standards for Wood Furniture Manufacturing Operations.	Facility does not produce wood furniture.
<u>i.</u>	Spray Booths	40 CFR Part 64	Compliance Assurance Monitoring.	Units do not emit greater than 50 tons/year of VOC.
<u>j.</u>	MDI Storage Tank	40 CFR Part 60, Subpart Kb	Standards Of Performance For Volatile Organic Liquid Storage Vessels	Exempted from applicability per October 15, 2003 Federal Register.
<u>k.</u>	Penolic Resin Storage Tanks	40 CFR Part 60, Subpart Kb	Standards Of Performance For Volatile Organic Liquid Storage Vessels	Exempted from applicability per October 15, 2003 Federal Register.
<u>l.</u>	Diesel Fire Pump	Chapter 103, Section 2(B)(1)(a)	Particulate emission limit for fuel burning equipment > 3.0 MMBtu/hr.	Not applicable, unit is < 3.0 MMBtu/hr.

[MEDEP Chapter 140]

- (7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the

original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

- B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
- C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
- D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[MEDEP Chapter 140]

- (8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license. [MEDEP Chapter 140]

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 and this license (Title 38 MRSA §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 140; [MEDEP Chapter 140]
- (3) 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; [MEDEP Chapter 140]
Enforceable by State-only
- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.

- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; [MEDEP Chapter 140]
Enforceable by State-only
- (6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license; [MEDEP Chapter 140]
- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, 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 the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [MEDEP Chapter 140]
- (8) 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 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;
 - 2. to demonstrate compliance with the applicable emission standards; or
 - 3. 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.
[MEDEP Chapter 140]
Enforceable by State-only
- (9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates 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.

[MEDEP Chapter 140]

Enforceable by State-only

- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.
 - A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;
 - B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 MRS § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

- C. All other deviations shall be reported to the Department in the facility's semiannual report.
[MEDEP Chapter 140]
- (11) Upon the written request of 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 manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [MEDEP Chapter 140]
- (12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [MEDEP Chapter 140]
- (13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
- (a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (e) Such other facts as the Department may require to determine the compliance status of the source;
- [MEDEP Chapter 140]

SPECIAL CONDITIONS

- (14) Thermal Oil Heaters #1 and #2
- A. LP is licensed to fire wood, #2 fuel oil and specification waste oil in Thermal Oil Heaters #1 and #2. Cleanup residue from the blenders and former infeed conveyors generated during normal plant operations may also be burned.
[~~MEDEP Chapter 140~~[A-327-70-A-I \(12/19/2000\)](#), BPT] **Enforceable by State-only**
 - B. The maximum firing rate of biomass into Thermal Oil Heaters #1 and #2 shall not exceed 3.3 tons/hr (4,090 Btu/lb, 54.5% moisture) (27.1 MMBtu/hr) per Thermal Oil Heater. Compliance shall be demonstrated by recording the number of fuel meter screw revolutions once per day and quarterly mass of biomass per revolution checks. Records shall be kept on a 12 month rolling total. [[A-327-70-A-I \(12/19/2000\)](#),~~MEDEP Chapter 140~~ BPT] **Enforceable by State-only**

- C. The maximum heat input capacity from the firing of fuel oil into the Thermal Oil Heaters shall not exceed 143 gal/hr (20.0 MMBtu/hr) demonstrated by fuel oil record keeping which includes records of hours of oil heater operation, and fuel use based on total monthly oil consumed with hours of operation and percent sulfur by weight provided by fuel oil supplier.

[[A-327-70-A-I \(12/19/2000\)](#),~~MEDEP Chapter 140~~, BPT] **Enforceable by State-only**

- D. LP is limited to 29,021.5 tons of biomass per year in each of the Thermal Oil Heaters (4,090 Btu/lb, 54.5% moisture) based on a 12 month rolling total (record keeping as described in Condition 14 (B)).

[[A-327-70-A-I \(12/19/2000\)](#),~~MEDEP Chapter 140~~, BPT] **Enforceable by State-only**

- E. LP is limited to 118,000 gallons of #2 fuel oil per year in the Thermal Oil Heaters (based on a 12 month rolling total), with a sulfur content not to exceed 0.3% by weight demonstrated by purchase records from the supplier.

[[A-327-70-A-I \(12/19/2000\)](#),~~MEDEP Chapter 140~~, BPT] **Enforceable by State-only**

- F. LP is limited to 4,000 gallons of specification waste oil per year (based on a 12 month rolling total), with a sulfur content not to exceed 0.7%. Only bearing grease, oil soaked rags, and floor sweepings containing oil shall be burned.

Compliance shall be based on record keeping of the amount of used oil drawn from the "Used Oil" barrel. The amount of oil contained on the rags has been estimated at less than 50 gallons per year based on testing performed by LP and is therefore considered insignificant.

[MEDEP Chapter 140, BPT] **Enforceable by State-only**

- G. Particulate matter (PM, PM₁₀) emissions from each Thermal Oil Heater shall be controlled by the operation and maintenance of a multiclone followed by an electrostatic precipitator (ESP).

LP shall operate, at a minimum, the number of ESP chambers and number of fields per chamber that operated during the most recent demonstration of compliance with the licensed particulate emission limits. [Data for the following points in the ESP shall be recorded once per shift during operation:](#)

- 1) [Secondary voltages on each field](#)
- 2) [Primary current on each field](#)
- 3) [Secondary current on each field](#)

[[A-327-70-A-I \(12/19/2000\)](#),~~MEDEP Chapter 140~~ BPT]

Upon written notification to the Department, and in accordance with the Bureau of Air Quality's Air Emission Compliance Test Protocol, LP may perform additional particulate emission testing to demonstrate compliance with alternative operating scenarios, but under no

circumstances shall LP be relieved of its obligation to meet its licensed emission limits.

[[A-327-70-A-I \(12/19/2000\), MEDEP Chapter 140](#) BPT]

H. Emissions from both TOH (combined) shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority
PM	0.15	MEDEP, Chapter 103, Section 2(B)(4)(a)
NO _x	0.33	MEDEP, Chapter 138, Section 3H, alternative RACT

Pollutant	lb/hr	Origin and Authority
PM	8.1	A-327-72-D-A/R (4/8/1998), MEDEP Chapter 140, BPT
PM ₁₀	8.1	A-327-72-D-A/R (4/8/1998), MEDEP Chapter 140, BPT
SO ₂	6.2	A-327-70-A-I (12/19/2000), MEDEP Chapter 140, BPT
NO _x	17.9	MEDEP Chapter 140, BPT
CO	106.6	A-327-72-D-A/R (4/8/1998), MEDEP Chapter 140, BPT
VOC	3.6	A-327-72-D-A/R (4/8/1998), MEDEP Chapter 140, BPT

~~I. PM CAM Requirements for the TOHs [40 CFR Part 64]~~

Condition	Indicator #1: ESP secondary voltage	Indicator #2: ESP primary and secondary current
1. Measurement Method	LP shall use a voltmeter or voltage sensor to monitor TOH ESP secondary voltage.	LP shall use an ammeter or current sensor to measure TOH ESP primary and secondary current.
2. Indicator Range	The range maintained is based on information derived from previous stack tests. If the voltage drops below that range, it is considered an excursion. The TOH is shut down and trouble shooting is conducted on the ESP and air lock systems.	LP shall shut down the TOH if the primary current is off. The secondary current range maintained is based on information derived from the previous stack tests. If the current is outside that range, it is considered an excursion. The system is shut down, the problem is identified, and corrective action is taken.
3. Data Representativeness	The accuracy of the voltmeter or voltage sensor shall be no more than ±5%.	The accuracy of the ammeter or current sensor shall be no more than ±5%.
4. QA/QC	LP shall confirm the voltmeter or voltage sensor reads zero when the unit is not operating. Operator confirms that the meter or sensor reads in the appropriate range once per day.	LP shall confirm the ammeter or current sensor reads zero when the unit is not operating. Operator confirms that the meter or sensor reads in the appropriate range once per day.
5. Monitoring Frequency	Operator monitors equipment intermittently.	Operator monitors equipment intermittently.
6. Data Collection Procedure	Secondary voltage data shall be recorded once per shift during operation.	Secondary current data shall be recorded once per shift during operation.
7. Averaging Period	No averaging periods for voltage shall be used.	No averaging periods for current shall be used.

(15) Dryer Vent RTO

A. LP is licensed to fire propane or natural gas in the Dryer Vent RTO.

~~[A-327-70-A-I (12/19/2000) MEDEP Chapter 140, BPT]~~ **Enforceable by State-only**

B. The maximum heat input capacity from the firing of propane into the Dryer Vent RTO shall not exceed 144 gal/hr (13.5 MMBtu/hr) demonstrated by flow meter logs or fuel flow recording charts.

[[A-327-70-A-I \(12/19/2000\)](#)~~MEDEP Chapter 140~~, BPT] **Enforceable by State-only**

C. LP shall maintain records of the Dryer Vent RTO hours of operation and propane or natural gas use indicating the quantity of fuel consumed, demonstrated by fuel meter logs.

[[A-327-70-A-I \(12/19/2000\)](#)~~MEDEP Chapter 140~~, BPT] **Enforceable by State-only**

D. Particulate matter (PM, PM₁₀) emissions from the Line Dryers shall be controlled by the operation and maintenance of a centrifugal cyclone separator followed by a wet electrostatic precipitator (ESP) prior to being introduced to the Dryer Vent RTO. [[A-327-70-A-I \(12/19/2000\)](#)~~MEDEP Chapter 140~~, BPT]

LP shall operate, at a minimum, the number of ESP chambers and number of fields per chamber that operated during the most recent demonstration of compliance with the licensed particulate emission limits. [[A-327-70-A-I \(12/19/2000\)](#)~~MEDEP Chapter 140~~, BPT]

Upon written notification to the Department, and in accordance with the Bureau of Air Quality's Air Emission Compliance Test Protocol, LP may perform additional particulate emission testing to demonstrate compliance with alternative operating scenarios, but under no circumstances shall LP be relieved of its obligation to meet its licensed emission limits.

[[A-327-70-A-I \(12/19/2000\)](#)~~MEDEP Chapter 140~~ BPT]

E. Emissions from the Dryer Vent RTO (stack #2) shall not exceed the following limits:

Pollutant	gr/dscf	Origin and Authority
PM	0.015	A-327-72-G-M (4/12/1996) MEDEP Chapter 140 , BPT

Pollutant	lb/hr	Origin and Authority
PM	15.6	A-327-72-G-M (4/12/1996) MEDEP Chapter 140 BPT
PM ₁₀	15.6	A-327-72-G-M (4/12/1996) MEDEP Chapter 140 , BPT
SO ₂	21.0	A-327-72-G-M (4/12/1996) MEDEP Chapter 140 , BPT
NO _x	32.9	A-327-72-D-A/R (4/8/1998) MEDEP Chapter 140 , BPT
CO	109.0	A-327-72-D-A/R (4/8/1998) MEDEP Chapter 140 BPT
VOC	5.6	A-327-72-G-M (4/12/1996) MEDEP Chapter 140 , BPT

F. PM CAM for the Dryer Vent [40 CFR Part 64]

Condition	Indicator #1 WESP Secondary Voltage	Indicator #2 WESP Secondary Current	Indicator #3 Bake-out Visible Emissions
1. Measurement Method	LP shall use a voltmeter or voltage sensor to monitor WESP secondary voltage for the Dryer Vent .	LP shall use an ammeter or current sensor to measure WESP current for the Dryer Vent .	LP shall use Method 9 observations to determine bake-out visible emissions from the Dryer Vent.
2. Indicator Range	An excursion is defined as a secondary voltage less than 30 kV DC, except during a flush. If the voltage drops below 30 kV, the dryer is shut down and the WESP is repaired.	The secondary current must be greater than 10 milliamps DC. If the current is below this threshold, it is considered an excursion. The system is shut down, the problem is identified, and corrective action is taken	Opacity must be less than or equal to 30% during bake-outs. Opacity higher than 30% for 2 hours, except for 30 minutes which cannot exceed 70%, is considered an excursion. Excursions trigger trouble shooting, corrective action, and reporting requirements.
3. Data Representativeness	The accuracy of the WESP voltmeter or voltage sensor shall be no greater than $\pm 5\%$.	The accuracy of the ammeter or current sensor shall be no greater than $\pm 5\%$.	LP shall perform the Method 9 observations at the RTO exhaust midway through the bake-out process.
4. QA/QC	LP shall confirm the meter or sensor reads zero when the unit is not operating. Operator confirms that the meter reads in the appropriate range once per day.	LP shall confirm the meter or sensor reads zero when the unit is not operating. Operator confirms that the meter reads in the appropriate range once per day.	The observer will have passed Method 9 certification training once within the past 18 months.
5. Monitoring Frequency	Operator monitors voltage intermittently.	Operator monitors voltage intermittently.	VE recorded midway through the bake-out process.
6. Data Collection Frequency	Secondary voltage shall be recorded once per shift during operation.	Secondary current shall be recorded once per shift during operation.	Visible emissions readings shall be taken every 15 seconds for at least 18 minutes, in accordance with EPA Method 9.
7. Averaging Period	No averaging period shall be used.	No averaging period shall be used.	6 minute averages for opacity shall be used.

Condition	Indicator #1 RTO Combustion Chamber Temperature	Indicator #2 RTO Outlet Air Flow	Indicator #3 RTO Inlet Static Pressure	Indicator #4 Position of RTO Isolation Damper
1. Measurement Method	LP shall monitor RTO combustion chamber temperature with thermocouples.	LP shall monitor RTO outlet air flow with an outlet flow monitor.	LP shall measure RTO inlet static pressure with an inlet pressure sensor.	LP shall determine the position of the RTO isolation damper with damper position indicators.

<p>2. Indicator — Range</p>		<p>Temperatures are maintained above the minimum one hour average temperatures at which compliance was demonstrated during emissions testing. If the one hour average temperature drops below this threshold, it is considered an excursion and the system is shut down until the problem is identified and repairs are completed. The excursion is reported.</p>	<p>Outlet air flows are maintained below the maximum air flow at which compliance was demonstrated during emissions testing. If the air flow is above this threshold, it is considered an excursion and the system is shut down until the problem is identified and repairs are completed. The excursion is reported.</p>	<p>The pressure must be less than or equal to zero (i.e., not positive pressure). If the pressure is above this threshold, it is considered an excursion and the system is shut down until the problem is identified and repairs are completed.</p>	<p>The isolation damper must be open while the dryers are operating. If closed, this is considered an excursion and the RTO is off line and not controlling emissions from the dryers.</p>
<p>3. Data — Representativeness</p>		<p>The thermocouples shall be installed in the combustion chamber per manufacturer's design. Thermocouples are accurate within $\pm 2\%$.</p>	<p>The airflow monitor shall be installed in a location which provides representative volumetric flow measurements. Flow monitor is accurate within $\pm 10\%$.</p>	<p>The inlet static pressure sensor shall be installed such that it provides representative pressure indications over the anticipated operating conditions. The pressure sensor is accurate within $\pm 10\%$ or 2 inches of water, whichever is greater.</p>	<p>The damper position indicators shall identify if the isolation damper is open or closed.</p>
<p>4. QA/QC</p>		<p>LP shall check temperature readouts against each other. All indicators must remain within $\pm 50^\circ\text{F}$ of each other. Annual calibrations shall be performed in accordance with manufacturer recommendations.</p>	<p>LP shall perform annual calibrations in accordance with manufacturer recommendations. Accuracy is checked during biennial stack testing.</p>	<p>LP shall perform annual calibrations in accordance with manufacturer recommendations.</p>	<p>No applicable calibration check. Confirm isolation damper indicators read correctly every 6 months.</p>
<p>5. Monitoring — Frequency</p>		<p>LP shall measure dryer vent RTO temperature continuously.</p>	<p>LP shall measure dryer vent RTO air flow continuously.</p>	<p>LP shall measure dryer vent RTO inlet static pressure continuously.</p>	<p>LP shall monitor the position of the isolation damper continuously.</p>
<p>6. Data — Collection — Procedure</p>		<p>LP shall record dryer vent RTO temperature every 15 minutes using an automatic data logger.</p>	<p>LP shall record dryer vent RTO air flow every 15 minutes using an automatic logger.</p>	<p>LP shall record dryer vent RTO inlet static pressure hourly.</p>	<p>LP shall record the position of the dryer vent RTO isolation damper hourly. Opening and closing of the damper is recorded.</p>

7. Averaging Period	LP shall average the dryer vent RTO temperature over 1 hour.	LP shall average the dryer vent RTO air flow over 1 hour	No average is taken.	Not applicable.
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(16) Press Vent RCO/RTO

- A. LP is licensed to fire propane or natural gas in the Press Vent RCO/RTO.
[\[A-327-70-F-A \(8/16/2004\), BPTMEDEP Chapter 140, BPT\]](#) **Enforceable by State-only**
- B. The maximum heat input capacity from the firing of propane into the Press Vent RCO shall not exceed 77.3 gal/hr (7.0 MMBtu/hr) demonstrated by flow meter logs or fuel flow recording charts. When the oxidizer system is operated as an RTO, the maximum heat input capacity from the firing of propane shall not exceed 120 gal/hr (11.2 MMBtu/hr).
[\[A-327-70-F-A \(8/16/2004\), BPTMEDEP Chapter 140, BPT\]](#) **Enforceable by State-only**
- C. LP shall maintain records of the Press Vent RCO/RTO hours of operation and propane or natural gas use indicating the quantity of fuel consumed, demonstrated by fuel meter logs.
[\[A-327-70-F-A \(8/16/2004\), BPTMEDEP Chapter 140, BPT\]](#) **Enforceable by State-only**
- D. Emissions from the Press Vent RCO (stack #3) shall not exceed the following limits:

Pollutant	gr/dscf	Origin and Authority
PM	0.015	MEDEP Chapter 140, BPT A-327-70-F-A (8/16/2004), BPT

Pollutant	lb/hr	Origin and Authority
PM	12.3	A-327-70-F-A (8/16/2004), BPT MEDEP Chapter 140, BPT
PM ₁₀	12.3	A-327-70-F-A (8/16/2004), BPT MEDEP Chapter 140, BPT
SO ₂	1.5	A-327-70-F-A (8/16/2004), BPT MEDEP Chapter 140, BPT
NO _x	19.9	A-327-70-F-A (8/16/2004), BPT MEDEP Chapter 140, BPT
CO	9.5	A-327-70-F-A (8/16/2004), BPT MEDEP Chapter 140, BPT
VOC	1.75	A-327-70-F-A (8/16/2004), BPT MEDEP Chapter 140, BPT

E. When the oxidation system is operated as an RTO, emissions from the Press Vent RTO (stack #3) shall not exceed the following limits:

Pollutant	gr/dscf	Origin and Authority
PM	0.015	A-327-72-E-M (2/2/1995) , MEDEP Chapter 140 , BPT

Pollutant	lb/hr	Origin and Authority
PM	12.3	A-327-72-E-M (2/2/1995) , MEDEP Chapter 140 , BPT
PM ₁₀	12.3	A-327-72-E-M (2/2/1995) , MEDEP Chapter 140 , BPT
SO ₂	1.5	MEDEP Chapter 140, BPT
NO _x	20.5	A-327-72-D-A/R (4/8/1998) , MEDEP Chapter 140 , BPT
CO	9.6	MEDEP Chapter 140, BPT
VOC	1.75	A-327-72-E-M (2/2/1995) , MEDEP Chapter 140 , BPT

- (17) [Dryer Vent RTO & Press Vent RCO/RTO Parametric Monitors \[A-327-70-F-A \(8/16/2004\), BPT\]](#)

[LP shall maintain and operate the following parameter monitors continuously as part of the Parametric Monitoring Plan:](#)

[Dryer Vent RTO and Press Vent RCO/RTO combustion chamber temperature. These temperatures shall be maintained above the minimum temperatures at which compliance with specified licensed limits was demonstrated during any emissions testing that demonstrated compliance.](#)

[Dryer Vent RTO and Press Vent RCO/RTO outlet air flow monitor. The air flow shall be less than the maximum air flow at which compliance with specified licensed limits was demonstrated during any emissions testing that demonstrated compliance.](#)

[Note, “continuous” is defined as: Equally spaced data points with at least one data point for each successive 15-minute period. A minimum of three evenly spaced data points constitutes a valid hour.](#)

[Each parameter monitor must record accurate and reliable data. If the parameter monitor is recording accurate and reliable data less than 98% of the source-operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions.](#)

- (18) [Dryer Vent RTO and Press Vent RCO/RTO Periodic Monitoring](#)

LP shall record the Dryer Vent RTO and Press Vent RCO/RTO inlet static pressure once per hour as part of the Parametric Monitoring Plan.

LP shall document the opening and closing of the Dryer Vent RTO and Press Vent RCO/RTO isolation dampers as part of the Parametric Monitoring Plan.

[A-327-70-F-A (8/16/2004), BPT]

(19) Line Dryers

A. LP is licensed to fire wood and #2 fuel oil in the Line Dryers and propane or natural gas in the pilots.

[A-327-70-A-I (12/19/2000), MEDEP Chapter 140, BPT] **Enforceable by State-only**

B. The maximum firing rate of biomass into the Core Line Dryer and Surface Line Dryer shall not exceed 2.6 tons/hr (8,500 Btu/lb, 5.5% moisture) (44.0 MMBtu/hr) per Dryer. Compliance shall be demonstrated by recording the number of fuel meter screw revolutions once per shift and quarterly mass of biomass per revolution checks.

[MEDEP Chapter 140, BPT] **Enforceable by State-only**

C. The maximum heat input capacity from the firing of fuel oil into the Core Line Dryer and Surface Line Dryer shall not exceed 247 gal/hr (34.6 MMBtu/hr) per Dryer demonstrated by flow meter logs or oil flow recording charts.

[A-327-70-A-I (12/19/2000), MEDEP Chapter 140 BPT] **Enforceable by State-only**

D. LP is limited to 22,776 tons of biomass per year in each of the two Line Dryers (8,500 Btu/lb, 5.5% moisture) based on a 12 month rolling total.

[MEDEP Chapter 140, BPT] **Enforceable by State-only**

E. LP is limited to 75,000 gallons of #2 fuel oil per year in the Line Dryers (based on a 12 month rolling total), with a sulfur content not to exceed 0.3% by weight demonstrated by purchase records from the supplier.

[MEDEP Chapter 140, BPT]

(20) The line dryers shall not operate unless the wet ESP and Dryer Vent RTO are operating. The main forming line shall not operate unless the Press Vent RCO/RTO is operating. For safety and fire hazard concerns, LP shall be allowed a maximum of 15 minutes from the time the RCO/RTO goes down to shut down the production line. Compliance shall be demonstrated by logbooks.

[MEDEP Chapter 140, BPT]

(21) LP shall not combust treated or pressure treated wood at this facility, except for waste produced in the process of manufacturing OSB.

[MEDEP Chapter 140, A-327-72-D-A/R (4/8/1998), BPT] **Enforceable by State-only**

(22) Visible emissions shall be recorded for Stack #1 on a quarterly basis; readings to be taken every 15 seconds for at least 18 consecutive minutes.

- A. At least one operator shall attend and successfully complete EPA Method 9 training (“smoke school”) once per session (two times per year).
- B. The operator attending the training shall conduct on-site training of Method 9 for operators who did not attend the training on how to perform a smoke reading. Only operators having passed smoke school once within the past 18 months may be re-trained by the current Method 9 certified operator.
- C. Opacity shall be recorded by a trained operator on a quarterly basis; readings to be taken every 15 seconds for at least 18 consecutive minutes.

[[A-327-70-A-I \(12/19/2000\)](#), ~~MEDEP Chapter 140~~, BPT]

(23) Visible emissions shall be recorded for Stack #2 and #3 during bake-outs; bake-out readings to be taken every 15 seconds for at least 18 consecutive minutes.

- A. At least one operator shall attend and successfully complete EPA Method 9 training (“smoke school”) once per session (two times per year).
- B. The operator attending the training shall conduct on-site training of Method 9 for operators who did not attend the training on how to perform a smoke reading. Only operators having passed smoke school once within the past 18 months may be re-trained by the current Method 9 certified operator.
- C. Opacity shall be recorded by a trained operator midway through the bake-out process; readings to be taken every 15 seconds for at least 18 consecutive minutes.

[[A-327-70-A-I \(12/19/2000\)](#), ~~MEDEP Chapter 140~~ BPT]

(24) Visible Emissions from Stack #1, #2, and #3

Visible emissions from Stack #1 (Thermal Oil Heaters), #2 (Dryer Vent RTO), or #3 (Press Vent RCO/RTO) shall not exceed an opacity of 20% on a six (6) minute block average basis, except for two (2) six (6) minute block averages in a 3-hour period.

For RTO and RCO start-ups during the bake-out process, visible emissions shall not exceed 30% for 2 hours except for 30 minutes which cannot exceed 70%.

[~~MEDEP Chapter 140~~, [A-327-70-F-A \(8/16/2004\)](#), BPT]

(25) LP shall perform **particulate matter (PM)** stack testing between January 1st and December 31st of each even numbered year on the Thermal Oil heater stack (Stack #1), the Dryer Vent stack (Stack #2) and the Press Vent stack (Stack #3). The test results shall be reported in gr/dscf for Stack #2 & #3, as well as lb/hr for all three stacks.

PM testing shall be conducted according to 40 CFR Part 60, Appendix A, Method 5, or other methods or testing scenarios approved by the Department.

A full engineering report shall be prepared for all required stack testing, including an evaluation of test procedures, test results, and source operations. LP shall submit such report to the Bureau of Air Quality within 30 days after testing. All testing programs shall comply with all of the requirements of the DEP compliance stack testing protocol.

[~~MEDEP Chapter 140, BPT~~[A-327-71-G-A \(9/9/2004\), BPT](#)]

- (26) LP shall perform **nitrogen oxides** (NO_x) stack testing once per 5-year license term on the Thermal Oil heater stack (Stack #1), the Dryer Vent stack (Stack #2) and the Press Vent stack (Stack #3). The test results shall be reported in lb/MMBtu for Stack #1 as well as lb/hr for all three stacks.

NO_x testing shall be conducted according to 40 CFR Part 60, Appendix A, Method 7E, or other methods or testing scenarios approved by the Department.

[MEDEP Chapter 140, BPT]

- (27) LP shall perform a **sulfur dioxide** (SO₂) and **carbon monoxide** (CO) stack test on the Press Vent stack (Stack #3) ~~within no later than 90 days after production first exceeds of the press reaching 600 518 tons per day on a seven-day average basis for six consecutive weeks~~ to verify the revised SO₂ and CO emission rates are correct. The test results shall be reported in lb/hr.

SO₂ testing shall be conducted according to 40 CFR Part 60, Appendix A, Method 6, or other methods or testing scenarios approved by the Department.

CO testing shall be conducted according to 40 CFR Part 60, Appendix A, Method 10, or other methods or testing scenarios approved by the Department.

[~~MEDEP Chapter 140, BPT~~]

- (28) Hydraulic Press
Production of oriented strand board product shall not exceed 600 tons of finished product per day averaged over a rolling seven day period. Appropriate records shall be maintained to demonstrate compliance with this condition, and made available to the Department upon request.

[MEDEP Chapter 140, BPT]

- (29) LP shall maintain a log detailing maintenance and any malfunctions that occur to all air pollution control equipment along with RCO/RTO bake-out times, dates, and durations shall be kept, and made available to representatives of the Department upon request.

[~~A-327-70-A-I (12/19/2000), MEDEP Chapter 140~~ BPT]

- (30) LP shall perform biennial **VOC** stack testing on the Press Vent RCO (Stack #3). Stack testing for VOCs shall follow 40 CFR, Part 60, Appendix A, Method 18, 25, 25A, 25B or other methods approved by the Department.

A full engineering report shall be prepared for all required stack testing, including an evaluation of test procedures, test results, and source operations. LP shall submit such report to the Bureau of Air Quality within 30 days after testing. All testing programs shall comply with all of the requirements of the DEP compliance stack testing protocol.

[~~A-327-70-F-A (8/16/2004)MEDEP Chapter 140~~, BPT]

- (31) LP shall check the activity level of a representative sample of the RCO catalyst at least once every 12 months.

[~~A-327-70-F-A (8/16/2004)40 CFR Part 63, Subpart DDDD, MEDEP Chapter 140~~, BPT]

- (32) **Dry Wafer Storage Bin Baghouse**

A. PM emissions from the Dry Wafer Storage Bin Baghouse shall not exceed 0.12 pounds per hour. Compliance with the PM lb/hr limit shall be demonstrated by stack testing in accordance with 40 CFR Part 60, Appendix A, Method 5 upon request by the Department.

[MEDEP Chapter 140, BPT]

B. VOC emissions from the Dry Wafer Storage Bin Baghouse shall be restricted to 3.1 tons per year on a twelve-month rolling average basis. Compliance shall be determined as follows:

$$\text{Tons of VOC/year} = \text{hours of operation per year} \times 0.713 \text{ lb/hr} / 2000$$

[MEDEP Chapter 140, BPT]

C. Visible emissions from the Dry Wafer Storage Bin Baghouse shall not exceed an opacity of 10 percent on a six (6) minute block average basis, for more than one (1) six (6) minute block average in a 1-hour period. LP shall take corrective action if visible emissions from the baghouse exceeds five (5) percent opacity.

[~~MEDEP Chapter 140~~A-327-70-D-A (12/9/2003), BPT]

- D. PM CAM for the dry wafer storage bins [40 CFR Part 64]

Condition	Indicator #1 Pressure Drop	Indicator #2 Inspection/Maintenance
1. Measurement Method	LP shall measure pressure drop across the baghouse with a differential pressure gauge.	LP shall perform inspections of the dry wafer storage bin baghouse each shift. Maintenance is performed as needed.
2. Indicator Range	The indicator range is a pressure drop between 0 and 5 inches of water. A pressure drop outside of this range is an excursion. If the pressure drop is high, the bags are changed out at the next maintenance period.	No applicable indicator range.
3. Data Representativeness	The pressure drop across the baghouse shall be measured on either side of the bags (inlet and outlet). The accuracy of the pressure gauge is 3%.	Inspections shall be performed at the baghouse.
4. QA/QC	The pressure gauge shall be replaced if it does not read properly. The pressure taps shall be checked	Qualified personnel shall perform inspections.

	quarterly for plugging. The cleaning cycle is initiated whenever there is downtime on the system.	
5. Monitoring Frequency	Pressure drop shall be monitored intermittently.	Inspection shall be performed once per shift.
6. Data Collection Procedure	Pressure drop shall be recorded once per shift.	Records shall be maintained to document inspections and any required maintenance.
7. Averaging Period	No average is taken.	Not applicable.

(33) **Flying Cut-Off Saw Baghouse**

A. PM emissions from the Flying Cut-Off Saw Baghouse shall not exceed 0.58 pounds per hour. Compliance with the PM lb/hr limit shall be demonstrated by stack testing in accordance with 40 CFR Part 60, Appendix A, Method 5 upon request by the Department.

[MEDEP Chapter 140, BPT]

B. VOC emissions from the Flying Cut-Off Saw Baghouse shall be restricted to 8.6 tons per year on a twelve-month rolling average basis. Compliance shall be determined as follows:

$$\text{Tons of VOC/year} = \text{hours of operation per year} \times 1.95 \text{ lb/hr} / 2000$$

[MEDEP Chapter 140, BPT]

C. Visible emissions from the Flying Cut-Off Saw Baghouse shall not exceed an opacity of 10 percent on a six (6) minute block average basis, for more than one (1) six (6) minute block average in a 1-hour period. LP shall take corrective action if visible emissions from the baghouse exceeds five (5) percent opacity.

[MEDEP Chapter 140, BPT]

D. PM CAM for the flying cut-off saw [40 CFR Part 64]

Condition	Indicator #1 Pressure Drop	Indicator #2 Inspection/Maintenance
1. Measurement Method	LP shall measure pressure drop across the baghouse with a differential pressure gauge.	LP shall perform inspections of the flying cut-off saw baghouse each shift. Maintenance is performed as needed.
2. Indicator Range	The indicator range is a pressure drop between 0 and 5 inches of water. A pressure drop outside of this range is an excursion. If the pressure drop is high, the bags are changed out at the next maintenance period.	No applicable indicator range.
3. Data Representativeness	The pressure drop across the baghouse shall be measured on either side of the bags (inlet and outlet). The accuracy of the pressure gauge is 3%.	Inspections shall be performed at the baghouse.
4. QA/QC	The pressure gauge shall be replaced if it does not read properly. The pressure taps shall be checked quarterly for plugging. The cleaning cycle is initiated whenever there is downtime on the	Qualified personnel shall perform inspections.

	system.	
5. Monitoring Frequency	Pressure drop shall be monitored intermittently.	Inspection shall be performed once per shift.
6. Data Collection Procedure	Pressure drop shall be recorded once per shift.	Records shall be maintained to document inspections and any required maintenance.
7. Averaging Period	No average is taken.	Not applicable.

(34) Spray booths [~~MEDEP Chapter 140~~A-327-70-C-M (11/5/2003), BACT]

- A. VOC emissions from the application of edgeseal in the two spray booths combined shall be restricted to 2.9 tons per year on a twelve-month rolling average basis.
- B. LP shall maintain a record of the usage of each type of edgeseal and VOC emissions from all edgeseals combined. The record shall be maintained on a monthly and twelve-month rolling total basis.

(35) **Diesel Fire Pump**

The diesel fire pump shall be limited to 500 hours of operation per year, firing 0.05% sulfur (documented through supplier fuel records) diesel fuel, based on a 12 month rolling total. Hours of operation shall be kept by an hour meter on the fire pump. Fuel purchase receipts indicating percent sulfur by weight shall be kept as well. [~~A-327-72-D-A/R (4/8/1998), MEDEP Chapter 140~~ BPT]

(36) **Miscellaneous Emission Units**

Emission Unit	Origin and Authority	Requirement Summary
Diesel Fire Pump	Chapter 101, Section 2(A), Chapter 140, BPT	Visible emissions shall not exceed an opacity of 20 percent on a six (6) minute block average basis, for more than two (2) six (6) minute block averages in a 3-hour period.

[~~MEDEP Chapter 140~~A-327-70-A-I (12/19/2000), BPT]

(37) **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.
[MEDEP Chapter 101]

(38) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed an opacity of 20 percent, 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 percent in any one (1) hour.

[MEDEP Chapter 101]

(39) **Hazardous Air Pollutants**[MEDEP Chapter 140, BPT] **Enforceable by State Only**

LP shall limit facility wide HAP emissions to 45.4 tons per year. Compliance shall be based the following:

HAPS from the Thermal Oil Heaters (TOH)

Tons of Biomass burned/year in the TOH X 0.05 lb HAP/Ton of Biomass

Plus

Gallons of #2 fuel oil burned/year in the TOH X 2.24×10^{-6} lb HAP/Gallon of oil

Plus

Gallons of waste oil burned/year in the TOH X 0.0275 lb HAP/Gallon of oil

Plus

HAPS from the Dryers

TFP/year X 0.228 lb HAP/TFP

Plus

HAPS from the Press

TFP/year X 0.066 lb HAP/TFP

Plus

HAPS from the Dry Wafer Storage Bin

Hours of operation X 0.713 lb HAP/hr

Plus

HAPS from the Flying Cut-Off Saw

Hours of operation X 1.95 lb HAP/hr

Equals Pounds of HAP emitted. Divide by 2000 to get Tons of HAP emitted.

TFP	=	Tons of Finished Product
ODT	=	Oven Dried Ton
MSF	=	1000 Square Feet

| (40) **Gasoline Storage Tank** [MEDEP Chapter 118]

A. The fill pipe shall extend within 6 inches of the bottom of the gasoline storage tank.

B. The licensee shall maintain records of the monthly and annual throughput of gasoline.

| (41) **Recordkeeping** [MEDEP Chapter 140, BPT]

For all of the equipment monitoring and recording required by this license, the licensee shall maintain records of the most current six year period. All parameter records shall be made available to the Bureau of Air Quality upon request.

| (42) **Certification by a Responsible Official** [MEDEP Chapter 140]

All reports (including semiannual reports and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official.

(43) **Monitoring and Recordkeeping Requirements**

A. The following are identified as Periodic Monitors [MEDEP Chapter 140]:

1. Thermal Oil Heater hours of operation on oil.
2. Thermal Oil Heater total monthly oil consumed.
3. Thermal Oil Heater fuel oil sulfur content.
4. Thermal Oil Heater monthly hours of operation on biomass.
5. Thermal Oil Heater monthly tons of biomass burned.
6. Thermal Oil Heater PM stack testing results when performed.
7. Thermal Oil Heater NO_x stack testing results when performed.
8. [Thermal Oil Heater ESP secondary voltage.](#)
9. [Thermal Oil Heater ESP primary current.](#)
10. [Thermal Oil Heater ESP secondary current.](#)
118. Dryer Vent RTO propane and/or natural gas use.
129. Dryer Vent PM stack testing results when performed.
130. Dryer Vent NO_x stack testing results when performed.
142. Dryer fuel oil sulfur content.

- 153. Dryer fuel meter screw revolutions once per shift.
- 164. Dryer quarterly mass of biomass per revolution checks.
- 17. Dryer RTO inlet pressure once per hour.
- 18. Position of Dryer RTO isolation dampers.
- 195. Press Vent RTO/RCO propane and/or natural gas use.
- 2016. Press Vent PM stack testing when performed.
- 2147. Press Vent NO_x stack testing when performed.
- 2248. Press Vent RTO/RCO visible emissions during bakeouts.
- 23. Press Vent RTO/RCO inlet pressure once per hour.
- 24. Position of Press Vent RTO/RCO isolation dampers.
- 2549. Dryer fuel oil use.
- 260. Daily board press output.
- 274. Fire pump hours of operation.
- 2834. Fire pump fuel oil percent sulfur.

B. The following are identified as Parameter Monitors [A-327-70-F-A (8/16/2004), BPT]:

- 1. Dryer RTO outlet air flow.
- 2. Dryer RTO combustion chamber temperature.
- 3. Press Vent RTO/RCO outlet air flow.
- 4. Press Vent RTO/RCO combustion chamber temperature.

C. The following are identified as CAM Monitors [40 CFR Part 64]:

- ~~1. Thermal Oil Heater ESP secondary voltage.~~
- ~~2. Thermal Oil Heater ESP primary current.~~
- ~~3. Thermal Oil Heater ESP secondary current.~~
- 1. Line Dryer WESP secondary voltage.
- 2. Line Dryer WESP secondary current.
- 3. Line Dryer Vent RTO bake-out visible emissions.
- ~~7. Line Dryer RTO outlet air flow.~~
- ~~8. Line Dryer RTO inlet pressure.~~
- ~~9. Position of Line Dryer RTO isolation dampers.~~
- ~~10. Line Dryer RTO combustion chamber temperature.~~
- ~~11. Press RTO/RCO combustion chamber temperature.~~
- ~~12. Press RTO/RCO outlet air flow.~~
- ~~13. Press RTO/RCO inlet pressure.~~
- ~~14. Position of Press RTO/RCO isolation dampers.~~
- 4. Dry wafer storage bin pressure drop across the baghouse.
- 5. Dry wafer storage bin baghouse inspection/maintenance.
- 6. Flying cut-off saw pressure drop across the baghouse.
- 7. Flying cut-off saw baghouse inspection/maintenance.

(44) Compliance Assurance Monitoring

- A. LP shall operate and monitor ~~Thermal Oil Heater #1 and #2, the~~ Core Line ~~Dryers, and~~ Surface Line Dryers, Press, Dry Wafer Storage Bins and Flying Cut-off Saw within the ranges established by the CAM plan received by the

Department on March 16, 2005. Prior to making any changes to the approved CAM plan, LP shall notify the Department and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [40 CFR 64.7.e]

- B. Upon detecting an excursion, LP shall restore normal operation of the control equipment as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. [40 CFR 64.7.d]
- C. Any excursion shall be reported on semiannual reports. If excursions occur, LP must also certify intermittent compliance with the emission limits for the control device monitored on their annual compliance certification. [40 CFR 64]

(45) **Quarterly Reporting**

The licensee shall submit a Quarterly Report to the Bureau of Air Quality within 30 days after the end of each calendar quarter, detailing the following, for the control equipment and CAM monitors required by this license. [MEDEP Chapter 117]

- A. All control equipment downtimes and malfunctions;
- B. All CAM monitor downtimes and malfunctions;
- C. All excess events of emission and operational limitations set by this Order, Statute, state or federal regulations, as appropriate. The following information shall be reported for each excess event;
 - 1. Standard exceeded;
 - 2. Date, time, and duration of excess event;
 - 3. Maximum and average values of the excess event, reported in the units of the applicable standard, and copies of pertinent strip charts and printouts when requested;
 - 4. A description of what caused the excess event;
 - 5. The strategy employed to minimize the excess event; and
 - 6. The strategy employed to prevent reoccurrence.
- D. A report certifying there were no excess emissions, if that is the case.

(46) **Semiannual Reporting [MEDEP Chapter 140]**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on July 31st and Jan 31st of each year. The facility's designated responsible official must sign this report.

The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date.

- A. Each semiannual report shall include a summary of the periodic and CAM monitoring required by this license.

- B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

(47) **Annual Compliance Certification**

LP shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The annual compliance certification is due January 31 of each year. The facility's designated responsible official must sign this report.

The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [MEDEP Chapter 140]

(48) **Annual Emission Statement** [MEDEP Chapter 137]

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- A. A computer program and accompanying instructions supplied by the Department;
or
B. A written emission statement containing the information required in MEDEP Chapter 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 no later than July 1 or as otherwise specified in Chapter 137.

(49) **Air Toxics Emissions Statement** [MEDEP Chapter 137]

The licensee shall report HAP emissions in accordance with MEDEP Chapter 137 no later than July 1, the information necessary to accurately update the State's

**Louisiana-Pacific Corporation
Aroostook County
New Limerick, Maine
A-327-70-H-A**

**Departmental
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Part 70 Air Emission License
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toxic air pollutants emission inventory by means of a written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions on the Air Toxics emissions inventory portion should be directed to:

Attn: Toxics Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017
Phone: (207) 287-2437

(50) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, sub-§5	Mercury Emission Limit	Enforceable by State-only

(51) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. An example of such units include refrigerators and any size air conditioner that contain CFCs.

[40 CFR, Part 82, Subpart F]

(52) **Asbestos Abatement**

When undertaking Asbestos abatement activities, LP shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

(53) **Annual Fee**

LP shall pay the annual air emission license fee within 30 days of April 30th of each year. Pursuant to 38 MRSA 353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under section 341-D, subsection 3.

DONE AND DATED IN AUGUSTA, MAINE THIS _____ DAY OF _____ 2006.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-327-70-A-I.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of receipt of application: March 16, 2005

Date of application acceptance: March 21, 2005

Date filed with the Board of Environmental Protection _____

This Order prepared by Mark E. Roberts, Bureau of Air Quality.