

Irving Forest Products, Inc.) **Department**
Oxford County) **Findings of Fact and Order**
Dixfield, Maine) **Part 70 Air Emission License**
A-409-70-C-R

After review of the Part 70 Air Emission License renewal application, staff investigation reports and other documents in the applicant’s file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Irving Forest Products, Inc. (Irving)
LICENSE NUMBER	A-409-71-C-R
LICENSE TYPE	Part 70 Air Emission License renewal
NAICS CODES	321912, 321113, 321999
NATURE OF BUSINESS	Lumber, Manufacturer
FACILITY LOCATION	24 Hall Hill Road, Dixfield
DATE OF LICENSE ISSUANCE	
LICENSE EXPIRATION DATE	

B. Emission Equipment

1. The following process emission units are addressed by this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Drying Kilns (1-11)	190,000BF per kiln per week	Process Equipment
Drying Kilns (12-13)	75,000 BF per kiln per week	Process Equipment
Cyclone (value added shavings)	6,000 tons per year	Particulate Control
Cyclone #2 (Planer Mill Shavings)	25,000 tons per year	Particulate Control
Cyclone #3 (Bagger Silo)	25,000 tons per year	Particulate Control
Cyclone #4 (Shavings Hopper)	25,000 tons per year	Particulate Control
Cyclone #5 (Planer Mill Chip Hopper)	6,000 tons per year	Particulate Control
Cyclone #6 (Dillon Boiler Fuel Silos)	1,000 tons per year	Particulate Control
Cyclone #7 (Dillon Boiler Fuel Input)	14,000 tons per year	Particulate Control
Parts Washer #1 (Equipment Garage)	10 gallon degreaser	10 gallon degreaser
Parts Washer #2 (Equipment Garage)	10 gallon degreaser	10 gallon degreaser

Irving Forest Products, Inc.
Oxford County
Dixfield, Maine
A-409-70-C-R

)
)
)
2

Department
Findings of Fact and Order
Part 70 Air Emission License

2. The following fuel burning emission units are addressed by this Part 70 License:

EMISSIONS UNIT ID	UNIT CAPACITY	UNIT TYPE
Boiler #1 (Dillon Boiler)	12.0 MMBtu/hr	Wood Burning
Boiler #2 (Dillon Boiler)	12.0 MMBtu/hr	Wood Burning
Boiler #3 (Burnham Boiler)	16.8 MMBtu/hr	#6 and #2 Fuel Oil Burning
Boiler #4 (IBC Boiler)	46.2 MMBtu/hr	Wood Burning
Fire Pump #1	2.0 MMBtu/hr	Diesel Fuel Oil Burning

3. Irving has additional insignificant activities that do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 Air Emission License renewal application and in Appendix B of *Part 70 Air Emission License regulations*, 06-096 CMR 140 (last amended on December 24, 2005).

C. Application Classification

The application for air emission license renewal for Irving includes an amendment to include an alternative fuel use record keeping method as well as provisions from Air Emission License amendment A-409-77-1-A issued under *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 1, 2005) to include an increase in the facility's licensed kiln through-put restriction. The license is considered to be a Part 70 Air Emission License renewal/amendment issued under 06-096 CMR 140 and 06-096 CMR 115.

II. EMISSION UNIT DESCRIPTION

A. Process Description

Irving of Dixfield, Maine is a manufacturer of kiln-dried pine lumber. The main mill is located on Hall Hill Road. The main mill includes a sawmill, a planer mill, four boilers, fuel storage and a maintenance garage.

Logs are delivered by truck to the mill and then placed in inventory; they are then sprayed with water to prevent damage by aerobic organisms. The logs are transferred from inventory into the mill by a portal crane. The crane feeds the logs to two decks, each feeding one of the two ring debarkers. All the bark is collected by mechanical conveyors and fed into a truck-loading bin to eventually be hauled offsite to customers.

The sawmill consists of two log breakdown lines. The first line is the head-rig line, which consists of a double-cut vertical band-saw, and a twin horizontal band-saw. The second line is the quad line, which consist of two chipper heads, four vertical band-saws and a twelve-inch double arbor gang circular saw. There are two saw edgers that are fed from these two lines.

All the lumber is fed to a single 16-foot trim saw line, feeding into a length and width sorter, which feeds into a sticker stacker. All lumber is then transferred by forklift into storage to await kiln drying.

All of the waste from these machine centers is chipped and conveyed along with chips from the chipping heads to a truck bin to eventually be loaded into trucks and delivered offsite to customers.

There are two waste system chippers on the first floor of the sawmill with cyclones and screens inside the building. All the sawdust is captured by the cyclones and conveyed to a truck bin were it is eventually loaded onto trucks for either transfer on-site to the wood-fired boilers or delivery offsite to customers.

The lumber is stored in a covered storage area. Fans blow on the wood in the storage area in order to keep the wood cool and to prevent growth of fungi that cause staining of the wood. All of the boards produced at the Irving mill are kiln dried at the plant. There are 13 kilns located at the mill. Eleven of the kilns are track kilns and each has a capacity of 190,000 BF per cycle. The other two kilns are front loading and each has a capacity of 75,000 BF per cycle. The lumber is transported from inventory into the kilns by forklift. Moisture from the kilns is exhausted through multiple vents to the atmosphere.

After being dried, the wood is transferred by forklift to the planer mill. Rough, dry lumber is fed through a planer machine to create finished lumber. Finished lumber is conveyed to a grading station where it is graded. After grading, trim saws are used to trim for grade and length. The lumber is then sorted and stacked according to grade and length.

The planer shavings and trimmer sawdust is pneumatically conveyed to the planner mill shavings cyclone. The planer mill shavings cyclone drops the shavings into a blowpipe that blows the dust to the bagger silo cyclone and into the bagger silo. Shavings from the bagger silo are blown from the silo to the shavings hopper cyclone, where the dust is dropped into the bagger for loading onto trucks and sold offsite.

Blocks of wood from the trimmers in the planner mill are mechanically conveyed to a dry hog. The hogged wood is pneumatically blown to a truck-loading bin where the wood is loaded onto trucks and transported to hoppers for use as fuel for the facility's three wood fired boilers or delivered offsite to customers.

Wood waste and chips to be burned in the wood fired boilers are delivered by truck and dumped into hoppers. The facility also purchases chipped up wood pallets for use as wood fired boiler fuel. The pallets are considered wood waste on the condition that the pallets are not coated, painted or treated in any way. A series of conveyors, augers and bucket-elevators deliver the wood fuel to the wood fired boilers. One cyclone is used at the Dillon wood-fired boilers where sawdust is blown into a hopper before the wood is fed into the boiler.

Irving makes use of three wood-fired boilers, designated Boilers #1, #2 and #4, and one oil-fired boiler, designated Boiler #3, which are used at the Irving Dixfield site to provide heat for the kilns, as well as space heat for other buildings

B. Boilers #1 and #2

Boilers #1 and #2, the two Dillon Boilers, are wood fired boilers, each with a maximum design heat input capacity of 12.0 MMBtu/hr and each exhausts to the same stack designated Stack #1. Boilers #1 and #2 were manufactured in 1959 and 1960 respectively. The boilers were manufactured prior to 1989; therefore, the boilers are not subject to EPA's New Source Performance Standards (NSPS), Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units).

Boilers #1 and #2 have no post-combustion pollution control devices in the boiler exhaust gas stream. Boilers #1 and #2 were retrofitted in 1993 with a new fuel delivery system and a multizone undergrate air system designed to improve the furnace combustion efficiency therefore reducing carryover of particulate matter. This retrofit did not increase either actual or allowable emissions and the cost was minor in context with the cost of a new boiler; therefore, the retrofit would not be considered a reconstruction of the boilers under NSPS.

Irving's initial Part 70 Air Emission License (A-409-70-A-I) established an annual wood fuel use restriction of 68,325 tons of wood per year at 50% moisture or equivalent, based on a twelve-month rolling total. Compliance with this restriction is discussed in Section D below.

Pre-control emissions of applicable regulated pollutants from Boilers #1 and #2 each are less than 100 ton/year. Therefore, neither Boilers #1 and #2 are subject to 40 CFR Part 64, *Compliance Assurance Monitoring (CAM)* for PM.

Emissions for the boilers were based on previous licensed limits. These limits were calculated using AP-42 factors and previously licensed fuel use limits.

Streamlining

1. Opacity

Irving accepts streamlining for opacity requirements. *Visible Emissions Regulation*, 06-096 CMR 101 (last amended May 18, 2003), Section 2(A)(1) is applicable, however, the Best Practical Treatment (BPT) opacity limit in this license is more restrictive.

2. Particulate matter

Irving accepts streamlining for particulate emissions requirements *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 (last amended November 3, 1990), Section 2(A)(3) is applicable; however, the Best Practical Treatment (BPT) particulate emissions limit is more restrictive.

Periodic Monitoring

Periodic monitoring shall consist of records indicating the amount of wood fuel fired based on wood weight. The fuel records shall be kept on a monthly and a twelve-month rolling total basis.

C. Boiler #4

Boiler #4, an IBC boiler manufactured prior to 1989, is a wood fired boiler with a maximum design heat input capacity of 46.2 MMBtu/hr and exhausts to Stack #3. Particulate matter emissions from the boiler are controlled by two, in series, multi-cyclone mechanical dust collectors in the post combustion gas stream. The used Boiler was manufactured and installed at Bates College in Lewiston, Maine prior to 1984 and moved to the Irving facility (formally Highland Lumber) in 1994. The boiler was manufactured prior to 1989; therefore, the boiler is not subject to EPA's New Source Performance Standards (NSPS), Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units).

In 2005, Irving retrofitted Boiler #4 with an over-fire combustion air system (secondary air) that supplies combustion air into multiple locations along the length of the furnace combustion chamber above the fuel chutes. The major components of the proposed retrofit include a new secondary air fan, new duct work, new variable frequency drive motors for the current induced draft fan, the new secondary air fan, the undergrate air fan and the fuel feed fan, new boiler controls for proper adjustment of the wood fuel and combustion air levels and a new O₂ monitor. The retrofit did not result in an increase in either actual or allowable emissions and the total cost was approximately \$60,000; therefore the retrofit would not be considered a reconstruction under NSPS.

Boiler #4 also makes use of two multi-cyclone mechanical dust collectors (multiclones) in the post combustion gas stream. The multi-cyclone mechanical dust collectors shall control particulate matter emissions to no greater than 0.3 lb/MMBtu. To ensure compliance to this limit Irving shall install, operate and maintain a non-specification opacity monitor.

To ensure compliance with particulate matter emissions standards, Irving shall undertake a compliance stack test for particulate matter emissions from Boiler #4 within 36 months of the signing of this Air Emission License.

Irving shall maintain a record of opacity and O₂ in exhaust gas from Boiler #4 with records logged at least once every four-hour period beginning with the 12:00 AM to 4:00 AM period. Irving shall also maintain a record of inspection and maintenance of the opacity and O₂ monitors.

Irving's initial Part 70 Air Emission License (A-409-70-A-I) established an annual wood fuel use restriction of 68,325 tons of wood per year at 50% moisture or equivalent, based on a twelve-month rolling total. Compliance with this restriction is discussed in Section D below.

Pre-control emissions of applicable regulated pollutants from Boiler #4, except CO, are less than 100 ton/year. Pre-control emissions of CO are greater than 100 tons a year, however, Irving is not required any add-on control device for the control of CO emissions. Therefore, Boiler #4 is not subject to 40 CFR Part 64, *Compliance Assurance Monitoring* (CAM) for PM.

Irving exceeds an annual total potential emissions of NO_x of 100 tons per year, therefore, Boiler #4 is subject to *Reasonably Available Control Technology for Facilities That Emit Nitrogen Oxides*, 06-096 CMR 138 (last amended August 4, 1994). Compliance with 06-096 CMR 138 is discussed in Section E below. The 2005 retrofit to Boiler #4 is expected to result in improved nitrogen oxide (NO_x) emissions.

Emissions for the boilers were based on previous licensed limits. These limits were calculated using AP-42 factors and previously licensed fuel use limits.

Streamlining

1. Opacity

Irving accepts streamlining for opacity requirements. 06-096 CMR 101, Section 2(A)(1) is applicable, however, the Best Practical Treatment (BPT) opacity limit in this license is more restrictive.

2. Particulate matter

Irving accepts streamlining for particulate emissions requirements. 06-096 CMR 103 Section 2 (A) (3) is applicable; however, the Best Practical Treatment (BPT) particulate emissions limit is more restrictive.

Periodic Monitoring

1. Periodic monitoring shall consist of records indicating the amount of wood fired based on wood weight. The fuel records shall be kept on a monthly and a 12-month rolling total basis.
2. Periodic monitoring shall also consist of records indicating opacity and O₂ in exhaust gas with readings logged at least once every four-hour period beginning with the 12:00 AM to 4:00 AM period.
3. Periodic monitoring shall also consist of records of inspection and maintenance of the opacity and O₂ monitors and recorders.

D. Wood Use

As per Irving's initial Part 70 Air Emission License (A-409-70-A-I), the facility is restricted to a total annual wood fuel usage of no greater than 68,325 tons of wood per year at 50% moisture or equivalent, based on a twelve-month rolling total. Irving currently weighs the majority of wood before being fired in Boilers #1, #2 and #4. A small portion of the wood fired in the boilers is generated from the Specialty or Value-added shop. This wood is blown to the Boiler #1 and #2 fuel silo in a known volume and the weight is calculated from that volume.

Irving has not requested a change in the facility's total annual wood fuel usage limit for the wood burning boilers, however, as discussed in Section B above, Irving has proposed an alternative to the wood fuel use compliance demonstration method as it was established in the facility's initial Part 70 Air Emission License (A-409-70-A-I). Irving has proposed that the facility be allowed to demonstrate compliance with the wood fuel restriction by using either wood weight, steam flow or a combination of both.

The Department has determined that calculating wood fuel usage from a measured steam flow and accepted boiler efficiency is an adequate method of determining fuel usage. Within thirty days of the issuance of this license, Irving shall submit to the Department the method (formulas and record keeping method) by which they will determine fuel usage from measured steam flows.

E. NO_x RACT

Irving exceeds an annual total potential emissions of NO_x of 100 tons per year, therefore, Irving is subject to *Reasonably Available Control Technology for Facilities That Emit Nitrogen Oxides*, 06-096 CMR 138 (last amended August 4, 1994) for facilities that emit Nitrogen Oxides.

1. In accordance with 06-096 CMR 138, Section 3 (L) (1), Irving shall perform an annual tune-up on Boiler #4.
2. In accordance with 06-096 CMR 138, Section 3-(L) (2), Irving shall comply with the following tune-up record keeping requirements for Boiler #4.
 - a. A tune-up procedure file must be kept on-site and made available to the Department upon request,
 - b. An oxygen/carbon monoxide curve or an oxygen/smoke curve must be kept on file,
 - c. Once the optimum excess oxygen setting has been determined, Irving must periodically verify that the setting remains at that value, and
 - d. If the oxygen level found is substantially higher than the value provided by the combustion unit manufacturer, Irving must improve the fuel and air mixing, thereby allowing operation with less air.

F. Boiler #3

Boiler #3, an oil fired Burnham boiler, was manufactured in 1990 and has a maximum design heat input capacity of 16.8 MMBtu/hr. Boiler #3 exhausts to Stack #1. Irving's initial Part 70 Air Emission License (A-409-70-A-I) permits the facility to fire #6 fuel oil or #2 fuel oil with a sulfur content of no greater than 0.5% sulfur by weight.

Irving has not requested a change in the facility's fuel use limit for Boiler #3, therefore, as per the facility's initial Part 70 Air Emission License (A-409-70-A-I), Irving shall continue to be limited to firing no greater than 875,000 gallons of fuel oil per year in Boiler #3 based on a twelve-month rolling total. Compliance with fuel usage limits shall be demonstrated by record keeping which shall include purchase receipts that specify the amount of fuel purchased, the sulfur content of the fuel and the fuel delivery date or documentation that the fuel meets ASTM D396 specifications for #2 fuel oil. Fuel records shall be maintained on a monthly as well as a 12-month rolling basis.

Boiler #3 was manufactured later than 1989; therefore, the boiler is subject to EPA's New Source Performance Standards (NSPS), Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units). The applicable requirements are included in the following:

1. Standard for sulfur dioxide: 60.42c,
2. Compliance and performance test methods and procedures for sulfur dioxide: 60.44c,
3. Reporting and record keeping requirements: 60.48c.

Emissions restrictions for the boiler were based on previous licensed limits. These limits were calculated using AP-42 factors and vender supplied data.

Streamlining

1. Opacity

Irving accepts streamlining for opacity requirements. 06-096 CMR 101, Section 2(A)(1) is applicable, however, the Best Practical Treatment (BPT) opacity limit in this license is more restrictive.

2. Particulate matter

Irving accepts streamlining for opacity requirements. 06-096 CMR 103 Section 2 (A) (3) is applicable, however, the Best Practical Treatment (BPT) opacity limit in this license is more restrictive.

Periodic Monitoring

Periodic monitoring shall consist of purchase receipts that specify the amount of fuel purchased, the sulfur content of the fuel and the fuel delivery date or documentation that the fuel meets ASTM D396 specifications for #2 fuel oil. Fuel records shall be maintained on a monthly as well as a 12-month rolling basis.

G. Emergency Diesel Fire Pump

Irving makes use of a 2.0 MMBtu/hr Emergency Diesel Fire Pump, designated Fire Pump #1. Fire Pump #1 was installed in 1997 and fires diesel fuel oil with a sulfur content of 0.05% sulfur by weight. The unit shall be limited to a total usage of 500 hours per year on a twelve month rolling total basis. Irving shall continue to operate and maintain an hour meter on the unit to ensure compliance with the hours of operation limits on the unit.

Fire Pump #1 shall be operated only when normal testing procedures, as recommended by the manufacturer, are being performed or in case of an emergency as defined in 06-096 CMR 100.

Emissions from Fire Pump #1 were based on previous licensed limits. These limits were calculated using AP-42 factors and vender supplied data.

Periodic Monitoring

Periodic monitoring shall consist of records indicating the hours of operation of Fire Pump #1 and the amount of diesel fuel fired calculated based on hours of operation. The record shall also include fuel purchase receipts that indicate amount of fuel purchased, sulfur content of the fuel and date of fuel purchase. The records shall be kept on a monthly and a 12-month rolling basis.

H. Drying Kilns

Irving utilizes 13 kilns to dry their lumber before sale. Kilns #1 through #11 are track kilns each with rated capacities of 190,000 BF per cycle. This gives Irving a total maximum kiln volume of 2,090,000 BF per cycle for kilns #1 through #11. These kilns are run on a 6-day charge cycle and are capable of 60 charges per year. Kilns #12 and #13 are older front loading kilns each with total maximum kiln volume of 75,000 BF (boardfeet) per cycle. Irving Forest Products, Inc. is capable of running 60 charges per year each through kilns #12 and #13 based on a twelve-month rolling total.

Irving predominantly dries eastern white pine. Irving's Air Emission License amendment (A-409-77-1-A) established a kiln through-put restriction of 101.55 MMBF per year (MMBF/yr). Using a factor of 2.26 pounds of VOC released in the kiln drying process for every 1,000 BF of white pine dried, Irving' is restricted to an annual VOC emission limit from kiln operations of no greater than 114.75 tons of VOC per year based on a twelve-month rolling total.

Periodic Monitoring

Periodic monitoring for the kiln operation shall consist of maintaining records indicating the quantity of wood dried in BF. The kiln records shall be kept on a monthly and a 12-month rolling basis.

I. Cyclones

Irving utilizes a number of process cyclones throughout the facility for handling particulate matter (PM) and particulate matter with a diameter of ten (10) microns or less (PM₁₀) that is generated by the wood processing equipment. Blowers convey the particulate from the process equipment, which includes saws, planers and wood conveying belts, to the cyclones.

Cyclone #1 is the Value Added Shavings cyclone and is used to control particulate emissions from the value added building. Cyclone #2 is the Planer Mill Shavings Cyclone. The trimmer sawdust and planer shavings are pneumatically conveyed to the planner mill shavings cyclone. The planner mill shavings cyclone drops the sawdust into a blowpipe that blows the dust to Cyclone #3, the Bagger Silo Cyclone, and into the Bagger Silo. Sawdust from the Bagger Silo is blown from the silo to Cyclone #4, the Shavings Hopper Cyclone, where the dust is dropped into the bagger for loading onto trucks and sold offsite.

Cyclone #5 is located at the Planer Mill Chip Hopper, which is a hopper used for directly dumping shavings and sawdust from the Planer Mill into trucks. Cyclone #6 is the Dillon Boiler Fuel Silo. The Dillon Boiler Fuel Silo is also called the Tek Tank. It receives shavings and sawdust from the Specialty mill or Value-added Shop. Cyclone #6 is located at the top of the Dillon Boiler House. The fuel is blown from the Tek Tank to the top of the boiler house where it is dropped into the fuel delivery system via Cyclone #7.

Visible emissions from each cyclone shall not exceed an opacity of 10% on a 6-minute block average basis.

Periodic Monitoring

Irving shall maintain a maintenance, inspection and repair log of the cyclones and silos. Irving shall inspect operations of the cyclones and the silos once per month and record findings in the maintenance, inspection and repair log.

Based on the type of control and operating in a manner consistent with good air pollution control practices, it is unlikely that the planer mill and sawmill will exceed the opacity limits; therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither EPA nor the state is precluded from performing its own testing and may take enforcement action for any violation discovered.

J. Parts Degreasers

Irving makes use of two 10-gallon parts degreasers in their maintenance department. One is in the mobile equipment garage and the other is in the sawmill. The degreasers make use of Ozzy Juice truck grade degreasing solution. This solvent is 0.005 percent VOCs by weight. The facility uses approximately 50 gallons of solvent per year per degreaser. The solvent weight is 8.47 pounds per gallon, therefore, Irving emits approximately 0.04 lbs/yr of VOCs from the parts washing activities. Should Irving convert to a solvent that contains greater than 5% VOC, Irving shall operate the parts degreasers in accordance with *Solvent Degreasers*, 06-096 CMR 130 (last amended June 28, 2004)

1. In accordance with 06-096 CMR 130, Section 3A, Irving shall equip each parts degreaser with the following:
 - a. Equip each parts degreaser with a cover that can be operated with one hand if vapor pressure >15 mmHG at 100°F, if the solvent is agitated or if the solvent is heated.
 - b. Equip each parts degreaser with an internal drainage basket so that parts are under the cover while draining if the solvent true vapor pressure > 32 mmHG at 100°F, except that the drainage basket may be external where an internal basket cannot fit into the degreaser.

- c. Affix each parts degreaser with a permanent conspicuous label summarizing the following operating standards:
 - Close cover when not in use,
 - Drain cleaned parts for at least 15 seconds or until dripping ceases,
 - If applicable, solvent spray must be a solid fluid stream and shall not exceed a pressure of 10 pounds per square inch gauge (psig),
 - Do not degrease porous or absorbent materials,
 - Do not operate degreaser if draft is greater than 131.2 feet per minute (ft/min) as measured between 3.28 and 6.56 feet upwind and at the same elevation as the tank lip), and
 - Do not operate degreaser upon occurrence of any visible leak until such leak is repaired.
2. In accordance with 06-096 CMR 130, Section 3A, Irving shall follow operational standards when making use of the facility's parts degreasers.
3. In accordance with 06-096 CMR 130, Section 3A, Irving shall implement one of the following control measures if the solvent true vapor pressure > 32 mmHG at 100°F or if the solvent is heated to above 120°F:
 - i. Freeboard height that gives a freeboard ratio (freeboard height divided by the smaller of the interior length, width or diameter) of greater than or equal to 0.7;
 - ii. Water cover at least 1 inch in depth (solvent shall be insoluble in and heavier than water); or
 - iii. Another system of equivalent control, such as refrigerated chiller or a carbon adsorber, approved by the Department and the Environmental Protection Agency (EPA).

Periodic Monitoring

As Irving utilizes a solvent that contains 5% VOC or less for use in the parts degreasers, to satisfy record keeping requirements Irving need only keep a copy of the MSDS sheet that demonstrates the VOC content of the solvent on file at the Irving facility.

If, in the future, Irving converts to a solvent that contains greater than 5% VOC, Irving shall operate the parts degreasers in accordance with *Solvent Degreasers*, 06-096 CMR 130 (last amended June 28, 2004) and a record shall be maintained in regards to solvent added and solvent removed, which would include the dates when solvent is added and the volume of solvent added and removed and the VOC content of the solvent.

K. Facility Emissions

- Annual emissions from Boiler #3 were calculated based on an annual fuel use restriction of no greater than 875,000 gal/yr #6 fuel oil, #4 fuel oil or #2 fuel oil with a sulfur content of no greater than 0.5% sulfur by weight.
- Annual emissions from Boilers #1, #2 and #4 were calculated based on an annual fuel use restriction of no greater than 68,325 tons of wood per year at 50% moisture combined or equivalent.
- Annual emissions from Emergency Fire Pump were calculated based on an annual usage restriction of 500 hours per year firing fires diesel fuel oil with a sulfur content of 0.05% sulfur by weight.
- Annual emissions from wood drying kiln operations are based on an annual wood drying kiln through-put restriction of no greater than 101.55 MMBF per year.

Total Licensed Annual Emissions for the Facility tons/year

(used to calculate the annual license fee)

Equipment	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boiler #3	3.3	3.3	34.5	24.3	2.2	0.5
Boilers #1 and #2	31.5	31.5	2.6	42.0	52.6	1.8
Boiler #4	54.6	54.6	5.1	80.9	101.2	3.4
Emergency Fire Pump	0.2	0.2	0.03	2.2	0.5	0.2
Wood Drying Kilns	-	-	-	-	-	114.75
Total TPY	89.6	89.6	42.2	149.4	156.5	120.65

III. AIR QUALITY ANALYSIS

Irving previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Part 70 Air Emission License renewal.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 Air Emission License renewal A-409-70-C-R, subject to the following conditions:

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to this **Irving Forest Products, Inc.** facility pursuant to the Department's preconstruction permitting requirements in *Emission license regulations*, 06-096 CMR 108 or *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 24, 2005) have been incorporated into this Part 70 Air Emission License renewal, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 Air Emission License renewal must be changed pursuant to the applicable requirements in 06-096 CMR 115 for making such changes and pursuant to the applicable requirements in 06-096 CMR 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

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

STANDARD 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; [06-096 CMR 140]

- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [06-096 CMR 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 CMR 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; [06-096 CMR 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. [06-096 CMR 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 February 6, 2008.

Permit Shield

#	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
1	Boilers #1, #2, #3 and #4	40 CFR Part 60, Subpart D	Standards of Performance for Fossil-Fuel-Fired Steam Generating Units for Which Construction is Commenced After August 17, 1971	All Boilers < 250 MMBtu/hr
2	Boilers #1, #2, #3 and #4	40 CFR Part 60, Subpart Da	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	All Boilers < 250 MMBtu/hr
3	Boilers #1, #2, #3 and #4	40 CFR Part 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	All Boilers < 100 MMBtu/hr
4	Boilers #1, #2, and #4	40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Commenced construction prior to June 9, 1989
5	Facility wide	40 CFR Parts 61	NESHAP	No applicable emissions sources at the Irving facility
6	Boilers #1, #2, #3 and #4	40 CFR Part 63	Section 112J of the Clean Air Act	A 112J determination has not been made because Irving is not a major source of HAPs
7	Boilers #1, #2, and #3	40 CFR Part 64	Compliance Assurance Monitoring (CAM)	Not applicable to regulation
8	Facility wide	40 CFR Parts 72-78	Acid Deposition Control	Irving is not an electricity generating facility.
9	Drying Kilns	06-096 CMR 134	VOC RACT	06-096 CMR 134 specifically exempts wood drying kilns

- (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 06-096 CMR 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.

[06-096 CMR 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.
[06-096 CMR 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 38 §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 06-096 CMR 140; [06-096 CMR 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; [06-096 CMR 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; [06-096 CMR 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; [06-096 CMR 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. [06-096 CMR 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.

[06-096 CMR 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.

[06-096 CMR 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 MRSA § 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.

[06-096 CMR 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. [06-096 CMR 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. [06-096 CMR 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;
- [06-096 CMR 140]

SPECIFIC CONDITIONS

- (14) Boiler #3
- A. Irving is licensed to operate Boiler #3, having a maximum heat input capacity of 16.8 MMBtu/hr firing either #6, #4 or #2 fuel oil. Irving Forest Products, Inc. shall fire #6 fuel oil or #2 fuel oil each with a sulfur content of no greater than 0.5% sulfur by weight in Boiler #3.
[06-096 CMR 140, BPT, 40 CFR Part 60 Subparts A & Dc, A-409-74-D-A/R]
 - B. Irving shall not exceed an annual fuel use limit of 875,000 gallons of fuel oil per year in Boiler #3 based on a twelve-month rolling total. Compliance with fuel usage and sulfur content limits shall demonstrated by record keeping which shall include purchase receipts that specify the amount of fuel purchased, the sulfur content of the fuel and the fuel delivery date or documentation that the fuel meets ASTM D396 specifications for #2 fuel oil. Fuel records shall be maintained on a monthly as well as a 12-month rolling basis. [06-096 CMR 140, BPT, A-409-70-A-I]

C. Emissions from Boiler #3 shall not exceed the following limits:

Boiler #3 lb/MMBtu limits

Pollutant	lb/MMBtu	Origin and Authority
PM	0.05	06-096 CMR 140, BPT
NO _x	0.37	06-096 CMR 140, BPT

[06-096 CMR 140, BPT, A-409-74-D-A/R]

Boiler #3 lb/hr limits

Pollutant	lb/hr	Origin and Authority
PM	0.85	06-096 CMR 140, BPT
PM ₁₀	0.85	06-096 CMR 140, BPT
SO ₂	8.8	06-096 CMR 140, BPT
NO _x	6.2	06-096 CMR 140, BPT
CO	0.6	06-096 CMR 140, BPT
VOC	0.13	06-096 CMR 140, BPT

[06-096 CMR 140, BPT, A-409-74-D-A/R]

D. Irving shall operate Boiler #3 such that the visible emissions from the boiler does not exceed 20% opacity on a six-minute block average basis, except for no more than two 6-minute block averages in a 3-hour period.

[06-096 CMR 101, 06-096 CMR 140, BPT, A-409-70-A-I]

(15) Boilers #1 and #2

A. Irving is licensed to operate Boilers #1 and #2, each having a maximum heat input capacity of 12.0 MMBtu/hr firing wood fuel.

[06-096 CMR 140, BPT, A-409-74-D-A/R]

B. Emissions from Boilers #1 and #2 each shall not exceed the following limits:

Boilers #1 and #2 (each) lb/MMBtu limits

Pollutant	lb/MMBtu	Origin and Authority
PM	0.3	06-096 CMR 140, BPT
NO _x	0.4	06-096 CMR 140, BPT

[06-096 CMR 140, BPT, A-409-71-I-A]

Irving Forest Products, Inc.
Oxford County
Dixfield, Maine
A-409-70-C-R

)
)
)
24

Department
Findings of Fact and Order
Part 70 Air Emission License

Boilers #1 and #2 (each) lb/hr limits

Pollutant	lb/hr	Origin and Authority
PM	3.6	06-096 CMR 140, BPT
PM ₁₀	3.6	06-096 CMR 140, BPT
SO ₂	0.3	06-096 CMR 140, BPT
NO _x	4.8	06-096 CMR 140, BPT
CO	6.0	06-096 CMR 140, BPT
VOC	0.2	06-096 CMR 140, BPT

[06-096 CMR 140, BPT, A-409-71-I-A]

- C. Irving shall operate Boilers #1 and #2 such that the visible emissions from Stack #1 does not exceed 30% opacity on a 6-minute block average basis, except for no more than two 6-minute block averages in a 3-hour period.

[06-096 CMR 101, 06-096 CMR 140, BPT, A-409-70-A-I]

(16) Boiler #4

- A. Irving is licensed to operate Boiler #4, having a maximum heat input capacity of 46.2 MMBtu/hr firing wood fuel.

[06-096 CMR 140, BPT, A-409-74-E-A]

- B. Emissions from Boiler #4 shall not exceed the following limits:

Boiler #4 lb/MMBtu limits

Pollutant	lb/MMBtu	Origin and Authority
PM	0.27	06-096 CMR 140, BPT
NO _x	0.4	06-096 CMR 140, BPT

[06-096 CMR 140, BPT, A-409-71-I-A]

Boiler #4 lb/hr limits

Pollutant	lb/hr	Origin and Authority
PM	12.5	06-096 CMR 140, BPT
PM ₁₀	12.5	06-096 CMR 140, BPT
SO ₂	1.2	06-096 CMR 140, BPT
NO _x	18.5	06-096 CMR 140, BPT
CO	23.1	06-096 CMR 140, BPT
VOC	0.8	06-096 CMR 140, BPT

[06-096 CMR 140, BPT, A-409-71-I-A]

Irving Forest Products, Inc.)
Oxford County)
Dixfield, Maine)
A-409-70-C-R 25

Department
Findings of Fact and Order
Part 70 Air Emission License

- C. Irving shall undertake a compliance stack test for particulate matter emissions from Boiler #4 within 36 months of the signing of this Air Emission License. [06-096 CMR 140, BPT]
- D. Irving shall operate Boiler #4 such that the visible emissions from the boiler does not exceed 30% opacity on a 6-minute block average basis, except for no more than two 6-minute block averages in a 3-hour period. [06-096 CMR 101, 06-096 CMR 140, BPT, A-409-71-I-A]
- E. Irving shall install, operate and maintain a non-specification opacity monitor in order to monitor opacity emissions from Boiler #4. The monitor shall be operated with a recorder. A record of opacity shall be maintained by Irving with readings logged at least once per every four-hour period beginning with the 12:00 AM to 4:00 AM period. [06-096 CMR 140, BPT, A-409-74-E-A]
- F. Irving shall install, operate and maintain an oxygen monitor in order to monitor O₂ concentrations in the exhaust gas from Boiler #4. The monitor shall be operated with a recorder. A record of O₂ shall be maintained by Irving with readings logged at least once per every four-hour period beginning with the 12:00 AM to 4:00 AM period. [06-096 CMR 140, BPT, A-409-74-E-A]

(17) Wood Fuel Use

- A. Irving shall be limited to a total annual wood usage limit is 68,325 tons of wood per year at 50% moisture or equivalent. Compliance with the wood fuel use limit shall be demonstrated through fuel usage records required for the wood firing boilers. [06-096 CMR 140, BACT, A-409-70-C-R]
- B. Irving shall determine the weight of all wood before being fired in Boilers #1, #2 and #4 and maintain a record of wood fired in the wood firing boilers. To determine the weight of the wood fired in the boilers, Irving shall either use the actual weight of the wood fired, calculate the weight of the wood fired by using the steam generated in the boilers or use a combination of both of these methods. [06-096 CMR 140, BACT, A-409-70-C-R]
- C. Within thirty days of the issuance of this license, Irving shall submit to the Department the method (formulas and record keeping method) by which they will determine fuel usage from steam measured steam flows. [06-096 CMR 140, BACT, A-409-70-C-R]

(18) NO_x RACT

1. In accordance with 06-096 CMR 138, Section 3 (L) (1), Irving Forest Products, Inc. shall perform an annual tune-up on Boiler #4.
[06-096 CMR 138, 06-096 CMR 140, BPT, A-409-70-A-I]
2. In accordance with MEDEP Chapter 138, Section 3 (L) (2), Irving Forest Products, Inc. shall comply with the following tune-up record keeping requirements for Boiler #4.
 - a. A tune-up procedure file must be kept on-site and made available to the Department upon request,
 - b. An oxygen/carbon monoxide curve or an oxygen/smoke curve must be kept on file,
 - c. Once the optimum excess oxygen setting has been determined, Irving Forest Products, Inc. must periodically verify that the setting remains at that value, and
 - d. If the oxygen level found is substantially higher than the value provided by the combustion unit manufacturer, Irving Forest Products, Inc. must improve the fuel and air mixing, thereby allowing operation with less air.
[06-096 CMR 138, 06-096 CMR 140, BPT, A-409-70-A-I]

(19) Fire Pump #1

- A. Irving is licensed to operate Fire Pump #1, having a maximum heat input capacity of 2.0 MMBtu/hr firing diesel fuel oil.
[06-096 CMR 140, BPT, A-409-70-A-I]
- B. Irving shall be limited to 500 hours of operation per year of Fire Pump #1 based on a twelve-month rolling total.
[06-096 CMR 140, BPT, A-409-70-A-I]
- C. Irving shall continue operate and maintain Fire Pump #1 hour meter.
[06-096 CMR 140, BPT, A-409-70-A-I]
- D. Irving is restricted to firing only diesel fuel with a sulfur content of no greater than 0.05% sulfur by weight in Fire Pump #1.
[06-096 CMR 140, BPT, A-409-70-A-I]

E. In order to demonstrate compliance with the hour of operations and the fuel sulfur content restrictions, Irving shall maintain a log of all Fire Pump #1 operations. The operations log shall include dates of operation, duration of operation, hour meter readings for each period of operation and circumstances for which the unit was operated, fuel purchase receipts or supplier certification indicating fuel sulfur content and date of fuel purchase.
[06-096 CMR 140, BPT, A-409-70-A-I]

F. Emissions from Fire Pump #1 shall be limited to the following:

Emergency Diesel Fire Pump lb/hr limits

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.6	06-096 CMR 140, BPT	Enforceable by State only
PM ₁₀	0.6	06-096 CMR 140, BPT	Enforceable by State only
SO ₂	0.1	06-096 CMR 140, BPT	Enforceable by State only
NO _x	8.8	06-096 CMR 140, BPT	Enforceable by State only
CO	1.9	06-096 CMR 140, BPT	Enforceable by State only
VOC	0.7	06-096 CMR 140, BPT	Enforceable by State only

[06-096 CMR 140, BPT, A-409-70-A-I]

G. Visible emissions from Fire Pump #1 shall not exceed 20% opacity on a six-minute block average, except for no more than 2 six-minute block averages in a 3-hour period. [06-096 CMR 101, 06-096 CMR 140, BPT, A-409-70-A-I]

(20) Drying Kilns

A. Irving shall be limited to drying a total of 101,550,000 boardfeet (101.55 MMBF) of lumber per year in the facility's drying kilns based on a twelve-month rolling total. [06-096 CMR 140, BPT, A-409-77-1-A]

B. Irving Forest Products, Inc. shall maintain records indicating the quantity of wood dried in BF and VOC emissions. VOC emissions shall be calculated using an emission factor of 2.26 pounds of VOC per 1,000 BF. The kiln record shall be maintained on a monthly and a twelve-month rolling total basis. [06-096 CMR 140, BPT, A-409-77-1-A]

(21) Parts Degreasers

A. Irving shall keep a copy of the parts degreaser solvent MSDS sheet that demonstrates the VOC content of the solvent on file at the Irving facility.
[06-096 CMR 140, BACT, A-409-70-C-R]

B. If, in the future, Irving converts to a solvent that contains greater than 5% VOC, Irving shall operate the parts degreasers in accordance with *Solvent Degreasers*, 06-096 CMR 130 (last amended June 28, 2004) and a record shall be maintained in regards to solvent added and solvent removed, which would include the dates when solvent is added and the volume of solvent added and removed and the VOC content of the solvent.

[06-096 CMR 130, 06-096 CMR 140, BACT, A-409-70-C-R]

C. In accordance with 06-096 CMR 130, Section 3A, Irving shall follow equipment and operational standards when making use of the facility's parts degreasers. [06-096 CMR 130, A-409-70-A-I]

D. In accordance with 06-096 CMR 130, Section 3A, Irving shall equip each parts degreaser with the following:

a. Equip each parts degreaser with a cover that can be operated with one hand if vapor pressure >15 mmHG at 100°F, if the solvent is agitated or if the solvent is heated.

b. Equip each parts degreaser with an internal drainage basket so that parts are under the cover while draining if the solvent true vapor pressure > 32 mmHG at 100°F, except that the drainage basket may be external where an internal basket cannot fit into the degreaser.

c. Affix each parts degreaser with a permanent conspicuous label summarizing the following operating standards:

- Close cover when not in use,
- Drain cleaned parts for at least 15 seconds or until dripping ceases,
- If applicable, solvent spray must be a solid fluid stream and shall not exceed a pressure of 10 pounds per square inch gauge (psig),
- Do not degrease porous or absorbent materials,
- Do not operate degreaser if draft is greater than 131.2 feet per minute (ft/min) as measured between 3.28 and 6.56 feet upwind and at the same elevation as the tank lip), and
- Do not operate degreaser upon occurrence of any visible leak until such leak is repaired.

[06-096 CMR 130, A-409-70-A-I]

E. In accordance with 06-096 CMR 130, Section 3A, Irving shall follow operational standards when making use of the facility's parts degreasers.

[06-096 CMR 130, A-409-70-A-I]

F. In accordance with 06-096 CMR 130, Section 3A, Irving shall implement one of the following control measures if the solvent true vapor pressure > 32 mmHG at 100°F or if the solvent is heated to above 120°F:

- i. Freeboard height that gives a freeboard ratio (freeboard height divided by the smaller of the interior length, width or diameter) of greater than or equal to 0.7;
- ii. Water cover at least 1 inch in depth (solvent shall be insoluble in and heavier than water); or
- iii. Another system of equivalent control, such as refrigerated chiller or a carbon adsorber, approved by the Department and the Environmental Protection Agency (EPA).

[06-096 CMR 130, A-409-70-A-I]

(22) General Process Emissions

A. Visible emissions from any general process source, including the wood waste conveying system (blowers) and the dust cyclones shall not exceed an opacity of 10% on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period.

[06-096 CMR 101, 06-096 CMR 140, BPT, A-409-70-A-I]

B. Irving Forest Products, Inc. shall maintain a maintenance, inspection and repair log of the cyclones and silos. Irving Forest Products, Inc. shall inspect operations of the cyclones and the silos once per month and record findings in the maintenance, inspection and repairs log.

[06-096 CMR 140, BPT, A-409-70-A-I]

(23) Record Keeping Requirements

The following is a list of the periodic monitoring required by this license:

1. Irving Forest Products, Inc. shall maintain a record of wood usage fired in Boilers #1, #2 and #4.
2. Irving Forest Products, Inc. shall maintain a log indicating opacity and O₂ emissions in Boiler #4.
3. Irving Forest Products, Inc. shall maintain a record of maintenance, inspection and repair of the Boiler #4 opacity and O₂ monitors and recorders.

4. Irving Forest Products, Inc. shall maintain a record regarding NO_x RACT tune-up requirements.
5. Irving Forest Products, Inc. shall maintain a record of #6 and #2 fuel oil purchased for Boiler #3 as well as the sulfur content of the fuels or documentation that the fuel meets ASTM D396 specifications for #2 fuel oil.
6. Irving Forest Products, Inc. shall maintain a record of use and fuel oil purchases for the Emergency Diesel Fire Pump.
7. Irving Forest Products, Inc. shall maintain a record of kiln production.
8. Irving Forest Products, Inc. shall maintain a record of maintenance, inspection and repair of the facility's cyclones.
9. If, in the future, Irving converts to a solvent that contains greater than 5% VOC, a record shall be maintained in regards to solvent added and solvent removed, which would include the dates when solvent is added and the volume of solvent added and removed and the VOC content of the solvent.

[06-096 CMR 140, BPT, A-409-70-A-I]

(24) 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 required by this license. [06-096 CMR 117]

1. All control equipment downtimes and malfunctions;
2. 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;
 - a. Standard exceeded;
 - b. Date, time, and duration of excess event;
 - c. 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;
 - d. A description of what caused the excess event;
 - e. The strategy employed to minimize the excess event; and
 - f. The strategy employed to prevent reoccurrence.
3. A report certifying there were no excess emissions, if that is the case.
[06-096 CMR 117, 06-096 CMR 140, BPT, A-409-70-A-I]

(25) Semiannual Reporting

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. Semiannual reports shall be due on January 30 and July 30 of each year.

- A. Each semiannual report shall include a summary of the periodic monitoring required by Condition 23 of 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.

[06-096 CMR 140, BPT, A-409-70-A-I]

(26) Annual Emission Statement

In accordance with *Emission Statements*, 06-096 CMR 137 (last amended July 6, 2004), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department;
- or
- 2) A written emission statement containing the information required in 06-096 CMR 137.

Reports and questions should be directed to:

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

Phone: (207) 287-2437

The emission statement must be submitted as specified in 06-096 CMR 137.
[06-096 CMR 137, A-409-70-A-I]

(27) Annual Compliance Certification

- A. The licensee shall submit an annual compliance certification to the Department and the EPA in accordance with Standard Condition (13) of this license. Annual compliance certifications shall be due January 31 of each year. [06-096 CMR 140, BPT, A-409-70-A-I]

B. 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. [06-096 CMR 140, BPT, A-409-70-A-I]

(28) Air Toxics Emissions Statement

If Irving exceeds the thresholds for HAPs listed in Appendix A of 06-096 CMR 137 in an inventory year, in accordance with 06-096 CMR 137, the licensee shall report, no later than July 1 every three years (2005, 2008, 2011, etc.) or as otherwise stated in 06-096 CMR 137, the information necessary to accurately update the State’s toxic air pollutants emission inventory by means of a computer program supplied by the Department or a written emission statement containing the information required in 06-096 CMR 137. NOTE: Based on emission factors developed by the Eastern Research Group (ERG) in their memo “Development of Average Emission Factors and Baseline Emission Estimates for the Industrial, Commercial and Institutional Boilers and Process Heaters National Emission Standard for Hazardous Air Pollutants” dated October 2002, Irving will most likely exceed the 06-096 CMR 137 thresholds of HAPs based on fuel burning alone should the facility exceed the following firing rates in a calendar year:

Fuel	Control Device	Quantity of fuel before Chapter 137 toxics reporting threshold is exceeded
Wood/Biomass	No control	1,263 Tons
Wood/Biomass	Cyclone	1,403 Tons
#6 Fuel Oil	No control	64,725 Gallons
#6 Fuel Oil	Cyclone	72,072 Gallons
#2 Fuel Oil	No Control	661,376 Gallons

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
 [06-096 CMR 137, A-409-70-A-I]

(29) The Licensee is subject to the State Regulations listed below

Origin and Authority	Requirement Summary	Enforceability
06-096 CMR 102	Open Burning	-
06-096 CMR 109	Emergency Episode Regulation	-
06-096 CMR 110	Ambient Air Quality Standard	-
06-096 CMR 116	Prohibited Dispersion Techniques	-
38 MRSA Section 3 § 585-B, subpart § 5	Reduce Mercury Use and Emissions	Enforceable by State only

(30) Units Containing Ozone Depletion 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]

(31) Asbestos Abatement

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

(32) Certification by a Responsible Official

All reports (including quarterly reports, 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. [06-096 CMR 140]

(33) Expiration of a Part 70 license

- A. Irving shall submit a complete Part 70 Air Emission License renewal application at least 6-months, but no more than 18-months, prior to the expiration of this Air Emission License renewal. [06-096 CMR 140]
- B. Pursuant to Title 5 MRSA § 10002, and 06-096 CMR 140, the Part 70 Air Emission License shall not expire and all terms and conditions shall remain in effect until the Department takes final action on the renewal application under 06-096 CMR 140. Prior to the expiration of the Part 70 Air Emission License, Irving will not be in violation of operation without a Part 70 Air Emission License. **Enforceable by State only**

