



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

Corinth Wood Pellets, LLC
Penobscot County
Corinth, Maine
A-956-71-C-R (SM)

Departmental
Findings of Fact and Order
Air Emission License
Renewal

FINDINGS OF FACT

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Corinth Wood Pellets, LLC (CWP) has applied to renew their Air Emission License permitting the operation of emission sources associated with their wood pellet manufacturing facility.

The equipment addressed in this license is located at 74 Hob Road, Corinth, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Fuel Burning Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (ton/hr)	Fuel Type	Install. Date	Stack #
Burner #1	20	1.26 ^a	wood chips, shavings, sawdust	2006	1
Burner #2	20	1.26 ^a	wood chips, shavings, sawdust	2006	2

^a Based on firing wood with a moisture content of 12% by weight.

Process Equipment

<u>Equipment</u>	<u>Max Finished Material Process Rate</u>	<u>Pollution Control Equipment</u>	<u>Stack #</u>
Rotary Dryer #1	11.1 ODT/hr ^b	Cyclone #1	1
Rotary Dryer #2	11.1 ODT/hr ^b	Cyclone #2	2
Screening/Pellet Processing Operations	11.1 ODT/hr ^b	Baghouse #1	3
Feed Stock Conveying Systems	n/a	Cyclone #3	4

^b Based on a moisture content of 0% by weight and referred to as oven-dried tons per hour (ODT/hr)

C. Application Classification

The application for CWP does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of currently licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended). With the process limits on the burners and rotary dryers, the facility is licensed below the major source thresholds and is considered a synthetic minor.

II. **BEST PRACTICAL TREATMENT (BPT)**

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

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

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

Process Description

CWP produces wood pellets to be sold as fuel for pellet-fired wood stoves. The facility operates two wood pellet processing lines each consisting of a triple-pass rotary dryer capable of processing 11.1 ODT/hr of wood chips, shavings, and sawdust (based on a moisture content of 0% by weight) utilizing a direct wood-fired burner with a maximum heat input capacity of 20 MMBtu/hr to provide the heat for the rotary dryer.

Wet wood chips, shavings, and sawdust are received at the facility and introduced into either one of two triple-pass rotary dryers with hot air supplied by the exhaust gas from the direct wood-fired burners. The dryers reduce the moisture content of the wet wood material from approximately 50% by weight to a typical moisture content of between 6% and 12% by weight or lower. The exhaust from each rotary dryer enters a cyclone which separates the dried wood material from the gas stream which is exhausted out of the cyclone through a stack.

The dried wood material is further processed by screening equipment. The dried wood material that doesn't pass through the screen is made into pellets, bagged, and sold as wood pellet fuel.

The dried sawdust-like undersized wood particles that fall through the screen are conveyed to the direct wood-fired burners for use as fuel. This fuel is fired in semi-suspension to enhance complete combustion.

B. Rotary Dryers #1 & #2 and Burners #1 & #2

CWP performs the wood drying process through the operation of two triple-pass rotary dryers (Rotary Dryers #1 & #2) each capable of processing 11.1 ODT/hr of wood chips, shavings, and sawdust (based on a moisture content of 0% by weight) utilizing direct wood-fired burners (Burners #1 & #2), each with a maximum heat input capacity of 20 MMBtu/hr, to provide the heat necessary to dry the wood material. The rotary dryers are used to dry wood chips, shavings, and sawdust for the production of wood pellets to be sold for use in pellet-fired wood stoves.

The direct wood-fired burners are operated in a manner to maintain a burner chamber temperature of around 1400°F. Due to the combination of high combustion temperatures and the firing of dry (12% moisture by weight) wood materials in suspension, the burners produce relatively low emissions of sulfur dioxide (SO₂), carbon monoxide (CO) and volatile organic compounds (VOC). Burner chamber temperatures are not so high as to cause the creation of thermal NO_x (generally occurring at temperatures of 2000°F or higher). Ash that is generated from combustion is carried along with the hot flue gases into the rotary dryers where the gases and ash come into direct contact with the wet wood chips, shavings, and sawdust being dried. This direct-contact process removes much of

the ash from the exhaust stream. The gases from the rotary dryers which include the burner exhaust gases exhaust to the atmosphere after passing through a cyclone which separates the dried wood materials from the air stream.

The manufacturer's recommended rotary dryer inlet temperature was between 750°F and 850°F. The manufacturer indicated that, at higher temperatures, the hot gases may cause the resin in the wood to "cook out" creating blue, hazy visible emissions from the cyclone exhaust. To prevent the emission of this blue haze, CWP's original air emission license contained a maximum rotary dryer inlet temperature of 800°F on the rotary dryers. During operation of the rotary dryers over the first year, CWP determined that while the maximum rotary dryer inlet temperature of 800°F is appropriate during the processing of most softwoods and hardwoods, it was too high when processing pine wood species. Through experimenting with different operating methods while processing pine, CWP has determined that the most effective processing method and associated operating conditions while processing pine, includes running the material through the two rotary dryers in series rather than in parallel and maintaining rotary dryer inlet temperatures no higher than 650°F.

1. BPT Findings

The BPT emission limits for all pollutants for the rotary dryers were based on a previous BACT analysis (06-096 CMR 115) as contained in A-956-71-B-A.

The BPT emission limits for each (except as noted) Rotary Dryer (#1 & #2) cyclone exhaust are the following:

Emission Unit	PM (lb/ODT)	PM ₁₀ (lb/ODT)	SO ₂ (lb/MMBtu)	NO _x (lb/ODT)	CO (lb/ODT)	VOC (lb/ODT)
Pine wood species						
Rotary Dryers Combined*	1.8	1.8	0.025	0.51	5.9	4.4
Other Softwood species (e.g., spruce & fir)						
Each Rotary Dryer	2.3	2.3	0.025	0.51	5.9	2.1
Hardwood species						
Each Rotary Dryer	1.1	1.1	0.025	0.51	4.5	1.0

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Pine wood species						
Rotary Dryers #1 & #2 Combined*	20.0	20.0	0.5	5.7	65.5	48.8
Other Softwood species (e.g., spruce & fir)						
Each Rotary Dryer	25.5	25.5	0.5	5.7	65.5	23.3
Hardwood species						
Each Rotary Dryer	30.0	30.0	0.5	5.7	50.0	11.1

* Because pine passes through the rotary dryers in series, lb/hr emission limits are on emissions from both rotary dryers combined.

Visible emissions from either Rotary Dryer cyclone exhaust (Stack #1 or #2) shall not exceed 20% opacity on a 6 minute block average, except for no more than one (1) six (6) minute block average in a 1-hour period.

2. Periodic Monitoring

Periodic monitoring for the Rotary Dryers shall include recordkeeping to document ODT of hardwood, pine, and other softwood processed on a monthly and 12 month rolling total basis.

C. Screening/Pellet Processing Operations

Screening/pellet processing operations at the facility include screens, conveyors, hammermills, pelletizers, coolers, and storage and bagging operations.

In air emission license A-956-71-B-A, the Department determined PM emissions from the hammermill were not effectively controlled through the use of a cyclone. To meet BACT, CWP installed and operates a reverse air filter (RAF) baghouse. The RAF baghouse replaces two cyclones. In addition to the hammermill, the RAF baghouse controls emissions from all points throughout the screening/pellet processing operations previously picked up by the former cyclones.

The Department finds that the proper operation and maintenance of the RAF baghouse in accordance with manufacturer's recommendations and compliance with the visible emissions limits contained in finding II.E or II.F below, as

appropriate, represents BPT for control of particulate matter emissions from the Screening/Pellet Processing Operations.

D. Feed Stock Conveying Systems

Feed Stock Conveying Systems at the facility include the storage of wood to be processed (whether in a storage building, bins, or in the open), conveyors, hammermill (bliss-overs), blowhog, and the movement of feedstock materials by yard equipment.

CWP installed a building to be used as temporary storage for the wood brought into the facility before being processed into pellets. The purpose of the storage building is to help reduce fugitive PM emissions during the storage of the wood and to maintain the quality of the feed stock to help stabilize combustion and drying operations in an effort to reduce emissions. The particulate matter emissions associated with some of the other operations are collected at various points and controlled through two cyclones. Controlled emissions from these operations are released to the ambient air through the exhaust stacks associated with each cyclone.

The Department finds that use of the storage building along with the proper operation and maintenance of the cyclones in accordance with manufacturer's recommendations and compliance with the visible emissions limits contained in finding II.E or II.F below, as appropriate, represents BPT for control of particulate matter emissions from these Feed Stock Conveying Systems.

E. Fugitive Emissions

Visible emissions from a fugitive emission source (including fuel/wood material stockpiles and roadways) shall not exceed an opacity of 20%, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20% in any one (1) hour.

F. General Process Emissions

Visible emissions from any general process source (not otherwise addressed in this license) 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.

G. Annual Emissions

1. Total Annual Emissions

CWP shall be restricted to the following annual emissions, based on a 12 month rolling total.

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

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	HAPS (Single/ Total)
Rotary Dryers #1 & #2 and Burners #1 & #2	25.0	25.0	0.6	6.5	75.5	48.0	9.9 / 24.9
Total TPY	25.0	25.0	0.6	6.5	75.5	48.0	9.9 / 24.9

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans*, 40 CFR Part 52, Subpart A, §52.21 Prevention of Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: Carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

Based on the facility's maximum fuel use, the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, CWP is below the major source threshold of 100,000 tons of CO₂e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source shall be determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient air quality impact analysis is not required for a minor source if the total emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

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

The total facility licensed emissions are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

ORDER

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

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

The Department hereby grants Air Emission License A-956-71-C-R subject to the following conditions.

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

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S.A. §347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [06-096 CMR 115]

- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 CMR 115]
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353-A. [06-096 CMR 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]

- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 2. pursuant to any other requirement of this license to perform stack testing.
 - B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - C. submit a written report to the Department within thirty (30) days from date of test completion.
- [06-096 CMR 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
 - B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
- [06-096 CMR 115]
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]

- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

SPECIFIC CONDITIONS

(16) **Rotary Dryers #1 & #2 and Burners #1 & #2**

- A. Rotary Dryers #1 & #2 shall not exceed combined 12-month rolling total processing rates that cause either one of the following two equations to be incorrect. These processing rates shall include the wood that passes through the rotary dryer which also includes the fraction that is returned to Burners #1 & #2. The amount of wood processed as well as the type in terms of pine, other softwood, and hardwood shall be determined and recorded on a monthly and 12-month rolling total basis. The 12-month rolling total processing rates shall be determined based on monthly raw material consumption determinations calculated using wood delivery receipts, recorded moisture contents, and weekly raw material inventory records. This method of determining the 12-month rolling total processing rates began on January 1, 2009 and shall continue until the Department determines an alternative method is more appropriate.

VOC Equation

$$([\text{Oven Dry Tons (ODT) of Pine Processed}] * 4.4 \text{ lbs of VOC/ODT} + [\text{ODT of Other Softwoods Processed}] * 2.1 \text{ lbs of VOC/ODT} + [\text{ODT of Hardwood Processed}] * 1 \text{ lb of VOC/ODT}) / 2000 \text{ lbs/ton}$$
 must be ≤ 48 TPY (tons per year) of VOCs

PM Equation

([Oven Dry Tons (ODT) of Pine Processed] * 1.8 lbs of PM/ODT + [ODT of Other Softwoods Processed] * 2.3 lbs of PM/ODT + [ODT of Hardwood Processed] * 1.1 lbs of PM/ODT)/2000 lbs/ton must be \leq 25 TPY (tons per year) of PM.

Note: Oven-dried tons (ODT) refers to a moisture content of 0% by weight.

[06-096 CMR 115, BPT]

- B. Burners #1 & #2 are licensed to fire wood/woodwaste materials which may include woodchips, wood shavings, and sawdust. [06-096 CMR 115, BPT]
- C. Emissions from each (except as noted) Rotary Dryer (#1 & #2) cyclone exhaust stack shall not exceed the following emission limits as associated with each particular species of wood being processed [06-096 CMR 115, BPT]:

Emission Unit	PM* (lb/ODT)	PM ₁₀ * (lb/ODT)	SO ₂ (lb/MMBtu)	NO _x (lb/ODT)	CO (lb/ODT)	VOC (lb/ODT)
Pine wood species						
Rotary Dryers Combined*	1.8	1.8	0.025	0.51	5.9	4.4
Other Softwood species (e.g., spruce & fir)						
Each Rotary Dryer	2.3	2.3	0.025	0.51	5.9	2.1
Hardwood species						
Each Rotary Dryer	1.1	1.1	0.025	0.51	4.5	1.0

* PM and PM₁₀ lb/ODT limits include filterable particulate only.

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Pine wood species						
Rotary Dryers #1 & #2 Combined*	20.0	20.0	0.5	5.7	65.5	48.8
Other Softwood species (e.g., spruce & fir)						
Each Rotary Dryer	25.5	25.5	0.5	5.7	65.5	23.3
Hardwood species						
Each Rotary Dryer	30.0	30.0	0.5	5.7	50.0	11.1

* Because pine passes through the rotary dryers in series, lb/hr emission limits are on emissions from both rotary dryers combined.

- D. When processing pine or a mix comprised of greater than a 25% pine wood CWP shall operate Rotary Dryers #1 & #2 in series (meaning that after the wood passes through one rotary dryer it then also passes through the other). CWP shall train each of its lead drying line operators how to monitor and determine whether or not the fraction of pine being processed is above or below 25% by weight. CWP shall record in a log the date, time, and duration of any periods when greater than 25% pine is processed and certify that the rotary dryers are operated in series during these periods and that the temperature limit contained in condition (16)E below is not exceeded. [06-096 CMR 115, BPT]
- E. The temperature of the drying gases, generated by the wood-fired burners, at the inlet of each rotary dryer shall not exceed 800°F when processing hardwood and softwood species other than pine or a pine mix less than 25% by weight and shall not exceed 650°F when processing all pine or a pine mix greater than 25% by weight. These rotary dryer inlet temperature limits apply at all times the rotary dryers are processing wood, except during periods of startup, shutdown, or malfunction. Compliance with temperature limits shall be based on 30 minute block averages, except that no more than one 30 minute period per day may exceed the limit by an amount of no more than 50°F more than the applicable limit. [06-096 CMR 115, BPT]
- F. The inlet temperature of each rotary dryer shall be monitored and recorded on a continuous basis. Temperature readings shall be reduced to one minute block averages which shall then be used to determine the 30 minute block average values. A valid one minute block average shall consist of at least one

recorded value each minute and the 30 minute block average shall consist of all one minute averages recorded during each 30 minute period. Each temperature monitoring and recording system shall be installed, operated, maintained, and calibrated in accordance with the manufacturer's recommendations. CWP shall maintain a log documenting all maintenance and calibration activities performed on these temperature monitoring and recording systems. CWP shall develop a written quality assurance/quality control (QA/QC) Plan, for the Department's review and approval, that specifies the maintenance, calibration, and recordkeeping procedures that will be used to ensure the quality of the data being displayed and recorded. The temperature monitoring and recording systems shall meet the parameter monitor uptime requirements contained in condition (24) below.

[06-096 CMR 115, BPT]

- G. Visible emissions from the Rotary Dryer cyclone exhaust stacks shall each not exceed 20% opacity 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]
- H. Exhaust gases from Burners #1 & #2 shall be directed through the rotary dryers and associated cyclones except during periods of startup, shutdown, or malfunction when the exhaust gases may be diverted through the associated bypass stack. These periods shall be limited to no more than one (1) hour per event. If the startup, shutdown, or malfunction event lasts longer than 1 hour, CWP shall either shut the unit down for at least a one hour period or the opacity limit in Condition (16)G above shall apply to the visible emissions from the bypass stack. [06-096 CMR 115, BPT]
- I. CWP shall operate automatic burner control systems on Burners #1 & #2 that tie fuel feed shut-offs to rotary dryer inlet temperature readings and that tie burner chamber combustion air fan speeds to burner chamber temperature readings. [06-096 CMR 115, BPT]
- J. CWP shall operate negative draft cyclones to control PM emissions from each of the Rotary Dryers. [06-096 CMR 115, BPT]
- (17) CWP shall operate the RAF baghouse and Cyclone #3 with its associated fabric filter at all times the Screening/Pellet Processing Operation is operating. [06-096 CMR 115, BPT]
- (18) CWP shall maintain a log documenting maintenance activities performed on the major equipment located at the facility, including Burners #1 & #2, Rotary Dryers #1 & #2, the RAF baghouse, and all facility cyclones. CWP shall record the date and location of all bag failures as well as all routine maintenance performed on this equipment. [06-096 CMR 115, BPT]

- (19) CWP shall not cause visible emissions (not including water vapor), measured as any opacity totaling twelve minutes or longer in any one hour period, to occur at ground level over any land or surrounding any buildings not owned by CWP. Opacity from an unobscured source under this condition shall be determined pursuant to the Environmental Protection Agency's (EPA's) Method 22 - Visual determination of fugitive emissions from material sources and smoke emissions from flares contained in 40 CFR Part 60, Appendix A. [06-096 CMR 115, BPT]
- (20) CWP shall employ and have on-site at least one person who is trained and certified in determining visible emissions in accordance with EPA Test Methods 9 and 22. These certified employees shall have the authority, and shall exercise such authority, to shut down any process or activity at the facility that is causing or contributing to excess visible emissions. An employee certified in determining visible emissions shall be on-site at all times the facility is operating. [06-096 CMR 115, BPT]
- (21) **Fugitive Emissions**
Visible emissions from fugitive emission sources located at the facility (including fuel/feed stock stockpiles and roadways) shall not exceed 20 percent opacity, 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. [06-096 CMR 101]
- (22) **General Process Sources**
Visible emissions from any general process source (not otherwise addressed in this license) shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]
- (23) **Startup, Shutdown, and Malfunction Recordkeeping**
CWP shall record each startup, shutdown, and malfunction event, including start time, end time, duration, cause, method utilized to minimize duration of the event and/or to prevent reoccurrence, and whether a bypass stack was utilized. [06-096 CMR 101]
- (24) **Parameter Monitors**
Each parameter monitor (i.e. inlet temperature of the Rotary Dryers) 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.
[06-096 CMR 115, BPT]

(25) **Annual Emission Statement**

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

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

The emission statement must be submitted as specified by the date in 06-096 CMR 137.

- (26) CWP shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 18 DAY OF September, 2013.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Core for
PATRICIA W. AHO, COMMISSIONER

The term of this license shall be ten (10) years from the signature date above.

[Note: If a complete renewal application, as determined by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 MRSA §10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the renewal of the license.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 9/13/11

Date of application acceptance: 9/19/11

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Poland, Bureau of Air Quality.

