



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE  
GOVERNOR

PATRICIA W. AHO  
COMMISSIONER

**Limington Lumber Company  
Cumberland County  
East Baldwin, Maine  
A-714-71-F-R (SM)**

**Departmental  
Findings of Fact and Order  
Air Emission License  
Renewal**

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

**I. REGISTRATION**

A. Introduction

Limington Lumber Company (Limington Lumber) has applied to renew their Air Emission License permitting the operation of emission sources associated with their sawmill and planer mill. The equipment addressed in this license is located at 411 Pequawket Trail, Route 113, in East Baldwin, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

**Boilers**

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Fuel Type</u>	<u>Manuf. Date</u>	<u>Install. Date</u>	<u>Control Equipment</u>	<u>Stack #</u>
Boiler #1	2.91	1010 lb/hr <sup>a</sup>	Wood	1981	1981	Zurn Collector	1
Boiler #2	6.28	42.9 gal/hr	#2 fuel oil (0.5% sulfur)	1983	1995	None	2
Boiler #3	2.93	20.9 gal/hr					3
Boiler #4	12.4	2,751lb/hr <sup>b</sup>	Wood	2005	2006	Two multiclones in series; staged air combustion	4

<sup>a</sup> Based on a heating value of 2860 Btu/hr (60% moisture)

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

Limington Lumber also operates two #2 oil fired units (at 0.5% by weight maximum sulfur content): a forced hot air heating unit in the Maintenance Garage and a forced hot water unit in the Office Building (a home furnace) rated at 0.015

and 0.14 MMBtu/hour, respectively. These units are below licensing threshold levels and are included here for completeness purposes only.

### Wood Processing Equipment

<u>Equipment</u>	<u>Max. Capacity</u>	<u>Control Equipment</u>
Pre-Dryer	4,106 MBF/yr <sup>°</sup>	none
Drying Kilns (10)	18,720 MBF/yr	none

<sup>°</sup> MBF/yr = thousand board feet per year

#### C. Application Classification

The application for Limington Lumber 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 fuel limit on the boilers, the facility is licensed below the major source thresholds and is considered a synthetic minor air emissions source.

## 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.

Limington Lumber produces pine lumber at its mill in East Baldwin. The facility is licensed to operate two wood-fired boilers, two oil-fired boilers, a pre-dryer, and wood drying kilns.

#### B. Boiler #1

Boiler #1 was manufactured in 1981 with a maximum firing rate of 2.91 MMBtu/hour and fires wood residue with variable heating value and moisture

content. Emissions from this boiler are controlled through use of a Zurn mechanical collector, which then exhausts through Stack 1, a 33 ft. above ground level (AGL) stack.

1. New Source Performance Standards

Because of both the size and the manufacture date, Boiler #1 is not subject to EPA New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for boilers with a heat input of 10 MMBtu/hour or greater and manufactured after June 9, 1989.

2. BPT Findings

Emissions from Boiler #1 are based on the following emission factors and shall not exceed the following lb/hour emission limits:

<u>Pollutant</u>	<u>Emission Factor, lb/MMBtu</u>	<u>Source of Factor</u>	<u>Emission Limit, lb/hr</u>
PM	0.3	06-096 CMR 115, BPT	0.9
PM <sub>10</sub>	--	Derived from PM limit	0.9
SO <sub>2</sub>	0.025	AP-42 Table 1.6-2(09/03)	0.07
NO <sub>x</sub>	0.22		0.64
CO	0.60		1.75
VOC	0.017	AP-42 Table 1.6-3(09/03)	0.05

Note: SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC emission limits are based upon AP-42 factors for a wet-wood fired boiler equipped with a mechanical collector.

Visible emissions from Boiler #1 shall not exceed 30% opacity on a six-minute block average basis, except for no more than two six-minute block averages in a three-hour period. [06-096 CMR 101]

3. Periodic Monitoring

Periodic monitoring for Boiler #1 shall include recordkeeping to document fuel use both on a monthly and a 12-month rolling total basis.

C. Boilers #2 and #3

Limington Lumber operates Boilers #2 and #3 for process steam and heat. The boilers are rated at 6.28 MMBtu/hour and 2.93 MMBtu/hour, respectively, and fire #2 fuel oil with a maximum sulfur content of 0.5% by weight. The boilers were both manufactured in 1983 and installed in 1995. Boiler #2 exhausts

through Stack 2 with a stack height of 32 ft. AGL, and Boiler #3 exhausts through Stack 3 with a stack height of 32 ft. AGL.

Fuel oil usage is limited to 250,000 gallons per year on a 12-month rolling total basis for the two oil-fired boilers combined, as previously licensed.

1. New Source Performance Standards

Because of both the sizes and the manufacture dates, Boilers #2 and #3 are not subject to the New Source Performance Standards (NSPS) of 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hour manufactured after June 9, 1989.

2. BPT Findings

The BPT emission limits for the boilers were based on the following:

- PM – 0.12 lb/MMBtu based on 06-096 CMR 103
- PM<sub>10</sub> – derived from the PM limit
- SO<sub>2</sub> – 0.5 lb/MMBtu, based on firing ASTM D396 compliant #2 fuel oil (0.5% sulfur)
- NO<sub>x</sub> – 20 lb/1000 gal, AP-42, Table 1.3-1, dated 5/10
- CO – 5 lb/1000 gal, AP-42, Table 1.3-1, dated 5/10
- VOC – 0.2 lb/1000 gal, AP-42, Table 1.3-3, dated 5/10
- Opacity – 06-096 CMR 101

The BPT emission limits for Boilers #2 and #3 are the following:

<u>Unit</u>	<u>PM</u> <u>(lb/hr)</u>	<u>PM<sub>10</sub></u> <u>(lb/hr)</u>	<u>SO<sub>2</sub></u> <u>(lb/hr)</u>	<u>NO<sub>x</sub></u> <u>(lb/hr)</u>	<u>CO</u> <u>(lb/hr)</u>	<u>VOC</u> <u>(lb/hr)</u>
Boiler #2 (6.28 MMBtu/hr) #2 fuel oil	0.75	0.75	3.1	0.90	0.20	0.01
Boiler #3 (2.93 MMBtu/hr) #2 fuel oil	0.35	0.35	1.5	0.42	0.10	0.004

Note: Values were calculated using a fuel heat content of 0.14 MMBtu/gallon.

Visible emissions from each boiler firing fuel oil shall not exceed 20% opacity on a six-minute block average basis, except for no more than one six-minute block average in a three-hour period.

Prior to January 1, 2016, the fuel oil fired in Boilers #2 and #3 shall be ASTM D396 compliant #2 fuel oil (maximum sulfur content of 0.5% by weight). Per

38 MRSA §603-A(2)(A)(3), beginning January 1, 2016, #2 fuel oil fired at the facility shall have a maximum sulfur content limit of 0.005% by weight (50 ppm); and beginning January 1, 2018, #2 fuel oil fired at the facility shall have a maximum sulfur content limit of 0.0015% by weight (15 ppm).

### 3. Periodic Monitoring

Periodic monitoring for Boilers #2 and #3 shall include recordkeeping to document fuel use both on a monthly and 12-month rolling total basis. Documentation shall include the type of fuel used and sulfur content of the fuel.

#### D. Boiler #4

Limington Lumber installed a wood-fired boiler in 2006, Boiler #4. Air Emissions License Amendment, A-714-71-C-A (March 17, 2006), addressed its emissions and established BACT emission limits. This license renewal will incorporate those requirements as BPT.

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

Particulate matter emissions from the boiler are controlled by two multiclones in series. NO<sub>x</sub> emissions are controlled through the use of staged air combustion. Sulfur Dioxide (SO<sub>2</sub>) emissions are limited through the use of wood as a fuel. CO and VOC emissions are controlled through good combustion techniques. Boiler #4 exhausts to a 40-ft. AGL stack, Stack #4. At this height, the stack represents about 50% Good Engineering Practice (GEP) formula stack height.

#### 1. New Source Performance Standards

New Source Performance Standards 40 CFR 60, Subpart Dc specifies emission standards, monitoring requirements, and test methods for steam generating units with heat input capacity greater than 10 MMBtu/hour and manufactured after June 9, 1989; this Subpart is applicable to Boiler #4.

Because Boiler #4 is wood-fired, there are no applicable SO<sub>2</sub> emissions standards specified in Subpart Dc. Boiler #4 is also less than 30 MMBtu/hour heat input capacity; therefore, Limington Lumber is not required to continuously monitor opacity of Boiler #4 emissions or meet the PM emission

standard contained in this Subpart. Boiler #4 is only subject to the reporting and record keeping requirements as outlined in 40 CFR 60.48c and 60.7.

## 2. BPT Findings

Emissions from Boiler #4 are based on the following emission factors and shall not exceed the following lb/hour emission limits:

<b>Pollutant</b>	<b>Emission Factor, lb/MMBtu</b>	<b>Source of Factor</b>	<b>Emission Limit, lb/hr</b>
PM	0.25	A-714-71-E-R/M (December 18, 2007) BACT	3.10
PM <sub>10</sub>	--	Derived from PM limit	3.10
SO <sub>2</sub>	0.03	A-714-71-E-R/M (December 18, 2007) BACT	0.37
NO <sub>x</sub>	0.22		2.73
CO	0.60		7.44
VOC	0.04		0.50

Note: SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC emission limits are based upon AP-42 factors for a wet-wood fired boiler equipped with a mechanical collector.

Visible emissions from Boiler #4 shall not exceed 30% opacity on a six-minute block average basis, except for no more than two six-minute block averages in a three-hour period. [06-096 CMR 101]

## 3. Periodic Monitoring

Periodic monitoring for Boiler #4 shall include recordkeeping to document fuel use both on a monthly and a 12-month rolling total basis.

## E. National Emission Standards for Hazardous Air Pollutants (NESHAP)

Boilers #1, #2, #3, and #4 may be subject to the requirements of 40 CFR Part 63, Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*. Boilers #1 and #4 are considered existing biomass boilers rated less than 10 MMBtu/hour each, and Boilers #2 and #3 are considered existing oil boilers rated less than 10 MMBtu/hour each.

For informational purposes, a summary of the currently applicable federal 40 CFR Part 63, Subpart JJJJJ requirements is listed below. At this time, the Maine Department of Environmental Protection has not taken delegation of this area source MACT (Maximum Achievable Control Technology) rule promulgated by EPA; however, Limington Lumber is still subject to the requirements.

Notification forms and additional rule information can be found on the following website: <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

Summary of 40 CFR Part 63, Subpart JJJJJ Requirements

a. Compliance Dates, Notifications, and Work Practice Requirements

i. Initial Notification of Compliance

An Initial Notification submittal to EPA was due on September 17, 2011. [40 CFR Part 63.11225(a)(2)]

ii. Boiler Tune-Up Program

(a) A boiler tune-up program shall be implemented to include the tune-up of applicable boilers by March 21, 2012, according to the rule currently in place. [40 CFR Part 63.11196(a)(1)] However, a No Action Assurance letter was issued on March 13, 2012, stating that EPA will exercise its enforcement discretion to not pursue enforcement action for failure to complete the required tune-up by the stated compliance date. The rule is expected to have a future compliance date in either 2013 or 2014 once the final revisions are promulgated.

(b) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; however, the burner must be inspected at least once every 36 months. [40 CFR Part 63.11223(b)(1)]
2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. [40 CFR Part 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv) and oxygen in volume percent, before and after adjustments are made. [40 CFR Part 63.11223(b)(5)]
6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of start-up. [40 CFR Part 63.11223(b)(7)]

- (c) A Notification of Compliance Status shall be submitted to EPA no later than 120 days after conducting the initial boiler tune-up. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]
- (d) The facility shall implement a boiler tune-up program after the initial tune-up and initial compliance report has been submitted.
  - 1. Each tune-up shall be conducted at a frequency specified by the rule and based on the size and age of the boiler. [40 CFR Part 63.11223(a)]
  - 2. The tune-up compliance report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the concentration of CO in the effluent stream (ppmv) and oxygen in volume percent, measured before and after the boiler tune-up; a description of any corrective actions taken as part of the tune-up of the boiler; and the type and amount of fuel used over the 12 months prior to the tune-up of the boiler. [40 CFR Part 63.11223(b)(6)] The compliance report shall also include the company name and address; a compliance statement signed by a responsible official certifying truth, accuracy, and completeness; and a description of any deviations and corrective actions. [40 CFR Part 63.11225(b)]

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 CFR Part 63 Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]: copies of notifications and reports with supporting compliance documentation; identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation. Records shall be in a form suitable and readily available for expeditious review.

F. Wood Drying

Limington Lumber operates a pre-dryer and several kilns for drying lumber. There are a total of ten wood drying kilns on site; eight of which are single kilns and one is a double kiln. The kilns are operated at about 150 °F over seven days, resulting in a 10 to 12% moisture content of the finished product.

The pre-dryer was installed in 1981, and the wood-drying kilns were installed in various years beginning in 1995. Wood drying is a source of VOC emissions. The total pre-dryer and kilns throughput is limited to 18.1 million board feet per year based on a 12-month rolling total [air emission license A-714-71-E-R/M

(December 18, 2007)]. VOC emissions from the wood drying equipment were calculated based on the Paper Industry NCASI study dated 7/96 for measurement of VOC emissions from lumber drying. Using the emission factor of 2.26 lb VOC/MBF, VOC emissions from drying the maximum throughput (MMBF/yr) at this facility are 20.5 tons/year.

1. NSPS and NESHAP Requirements

There are no NSPS or NESHAP requirements applicable to the wood drying equipment at Limington Lumber.

2. Periodic Monitoring

Periodic monitoring shall consist of record keeping which includes monthly records of board feet processed and a 12-month rolling total.

G. Fugitive Emissions

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

H. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis, except for no more than one six-minute block average in a one-hour period.

I. Annual Emissions

1. Total Annual Emissions

Limington Lumber shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits were calculated based on a combined annual fuel oil limit for Boilers #2 and #3 of 250,000 gallons, 8760 hours/year for all other fuel burning sources, and 18.1 MMBF/year through the wood drying process.

**Total Licensed Annual Emissions for the Facility**

**Tons/year**

(used to calculate the annual license fee)

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
Boiler #1 (2.91 MMBtu/hour, wood)	3.9	3.9	0.3	2.8	2.6	0.2
Boiler #2 (6.28 MMBtu/hour, #2 fuel oil) and Boiler #3 (2.93 MMBtu/hour, #2 fuel oil)	2.1	2.1	8.8	2.5	0.7	0.1
Boiler #4 (12.4 MMBtu/hour, wood)	13.6	13.6	1.6	12.0	32.6	0.9
Pre-Dryer and Drying Kilns	--	--	--	--	--	20.5
<b>Total TPY</b>	<b>19.6</b>	<b>19.6</b>	<b>10.7</b>	<b>17.3</b>	<b>35.9</b>	<b>21.7</b>

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 (CO<sub>2</sub>e).

Based on the facility's fuel use limit, 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, Limington Lumber is below the major source threshold of 100,000 tons of CO<sub>2</sub>e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

**III. AMBIENT AIR QUALITY ANALYSIS**

The level of air quality analyses required for a renewal source shall be determined on a case-by case basis, per 06-096 CMR 115. Modeling is not required for a renewal if the total emissions of any pollutant released do not exceed the following and there are no extenuating circumstances:

<b>Pollutant</b>	<b>Tons/Year</b>
PM	25
PM <sub>10</sub>	25
SO <sub>2</sub>	50
NO <sub>x</sub>	50
CO	250

Because the licensed total emissions of pollutants released from this facility do not exceed modeling threshold quantities, Limington Lumber is not required to conduct air quality impact modeling.

### ORDER

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

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

The Department hereby grants Air Emission License A-714-71-F-R (SM) 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) **Boiler #1**

- A. Boiler #1 shall fire wood waste. [A-714-71-E-R/M (SM), December 18, 2007, BPT]
- B. Emissions from Boiler #1 shall not exceed the following:

<b>Pollutant</b>	<b>Emission Limit, lb/hr</b>	<b>Origin and Authority</b>
PM	0.9	06-096 CMR 115, BPT
PM <sub>10</sub>	0.9	
SO <sub>2</sub>	0.07	
NO <sub>x</sub>	0.64	
CO	1.75	
VOC	0.05	

- C. Visible emissions from Boiler #1 shall not exceed 30% opacity on a six-minute block average basis, except for no more than two six-minute block averages in a three-hour period. [06-096 CMR 101]
- D. Periodic monitoring for Boiler #1 shall include recordkeeping to document fuel use both on a monthly and a 12-month rolling total basis. [06-096 CMR 115, BPT]
- E. Emissions from Boiler #1 shall be vented to a mechanical collector before exhausting through Stack #1. [06-096 CMR 115, BPT]

(17) **Boilers #2 and #3**

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

<b>Pollutant</b>	<b>Emission Limits</b>		<b>Origin and Authority</b>
	<b>Boiler #2</b> (6.28 MMBtu/hr) #2 fuel oil	<b>Boiler #3</b> (2.93 MMBtu/hr) #2 fuel oil	
PM	0.12 lb/MMBtu		06-096 CMR 103(2)(B)(4)(a)
	0.75 lb/hr	0.35 lb/hr	06-096 CMR 115, BPT
PM <sub>10</sub>	0.75 lb/hr	0.35 lb/hr	06-096 CMR 115, BPT
SO <sub>2</sub>	3.1 lb/hr	1.5 lb/hr	
NO <sub>x</sub>	0.90 lb/hr	0.42 lb/hr	
CO	0.20 lb/hr	0.10 lb/hr	
VOC	0.01 lb/hr	0.004 lb/hr	

B. Visible emissions from each boiler firing fuel oil shall not exceed 20% opacity on a six-minute block average basis, except for no more than one six-minute block average in a three-hour period. [06-096 CMR 101 (2)(B)(1)(b)]

C. Fuel

1. Total fuel use for Boilers #2 and #3 shall not exceed 250,000 gal/year of #2 fuel oil on a 12 month rolling total basis.
2. Prior to January 1, 2016, the #2 fuel oil fired in the boilers shall be ASTM D396 compliant (maximum sulfur content of 0.5% by weight). [06-096 CMR 115, BPT]
3. Beginning January 1, 2016, #2 fuel oil fired at the facility shall have a maximum sulfur content limit of 0.005% by weight (50 ppm). [38 MRSA §603-A(2)(A)(3)]
4. Beginning January 1, 2018, #2 fuel oil fired at the facility shall have a maximum sulfur content limit of 0.0015% by weight (15 ppm). [38 MRSA §603-A(2)(A)(3)]
5. Compliance shall be demonstrated by fuel records from the supplier showing the quantity, type, and percent sulfur of the fuel delivered. Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 CMR 115, BPT]

(18) **Boiler #4**

A. Emissions from Boiler #4 shall not exceed the following:

<b>Pollutant</b>	<b>Emission Limit</b>	<b>Origin and Authority</b>
PM	0.25 lb/MMBtu	A-714-71-E-R/M (December 18, 2007), BACT
	3.1 lb/hr	
PM <sub>10</sub>	3.1 lb/hr	
SO <sub>2</sub>	0.37 lb/hr	
NO <sub>x</sub>	2.73 lb/hr	
CO	7.44 lb/hr	
VOC	0.50 lb/hr	

- B. Visible emissions from Boiler #4 shall not exceed 30% opacity on a six-minute block average basis, except for no more than two six-minute block averages in a three-hour period. [06-096 CMR 101]
- C. Periodic monitoring for Boiler #4 shall include recordkeeping to document fuel use both on a monthly and a 12-month rolling total basis. [06-096 CMR 115, BPT]
- D. Emissions from Boiler #4 shall exhaust through two multiclones in series. [06-096 CMR 115, BPT]
- E. Boiler #4 shall utilize staged air combustion and O<sub>2</sub> trim to reduce NO<sub>x</sub> emissions. [A-714-71-E-R/M (December 18, 2007), BACT]
- F. **New Source Performance Standards** [40 CFR Part 60, Subpart Dc]

Limington Lumber shall comply with all requirements of 40 CFR Part 60, Subpart Dc for Boiler #4, including but not limited to the following:

1. Limington Lumber shall record and maintain records of the amounts of each fuel combusted during each day in Boiler #4.
2. Limington Lumber shall maintain records required by Subpart Dc for Boiler #4 for a period of two years following the date of such record.
3. The following address for EPA shall be used for any reports or notifications required to be copied to them:

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

(19) **Wood Drying Kilns**

- A. Yearly throughput is limited to 18.1 million board feet per year based on a 12-month rolling total. Compliance shall be demonstrated through kiln loading records. [A-714-71-E-R/M (December 18, 2007), BPT]
- B. Limington Lumber shall limit VOC emissions from the wood kilns to less than 20.5 tons per year based on a 12-month rolling total.
- C. Limington shall use the following equations to calculate monthly and annual VOC emissions from the wood drying equipment to determine compliance with the above emission limit [A-714-71-E-R/M (December 18, 2007), BPT]:

Monthly VOC (from pine) =

$$\left( \frac{2.26 \text{ lb}}{1000 \text{ board feet}} \right) \cdot \left( X \frac{\text{board-feet of pine}}{\text{month}} \right)$$

Monthly VOC (from non-pine species) =

$$\left( \frac{1.28 \text{ lb}}{1000 \text{ board feet}} \right) \cdot \left( X \frac{\text{board-feet of non-pine}}{\text{month}} \right)$$

---

---

Total monthly VOC (tons) = [VOC (pine) + VOC (non-pine)] ÷ 2000

Annual VOC (TPY) = sum of the last 12 months of monthly VOC emissions (tons)

(20) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity, except for no more than five minutes in any one-hour period. Compliance shall be determined by an aggregate of the individual fifteen-second opacity observations which exceed 20% in any one hour. [06-096 CMR 101]

(21) **General Process Emissions**

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis, except for no more than one six-minute block average in a one-hour period.

(22) **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

**Limington Lumber Company  
Cumberland County  
East Baldwin, Maine  
A-714-71-F-R (SM)**

18

**Departmental  
Findings of Fact and Order  
Air Emission License  
Renewal**

accurately update the State's emission inventory by means of either of the following:

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

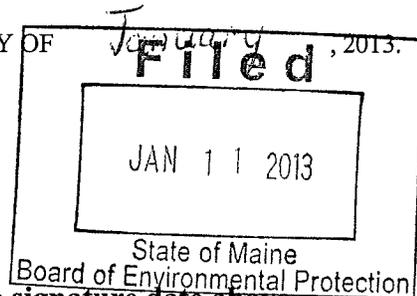
The emission statement must be submitted as specified by the date in 06-096 CMR 137.

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

DONE AND DATED IN AUGUSTA, MAINE THIS 11 DAY OF January, 2013.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marie 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, 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: November 28, 2012

Date of application acceptance: November 30, 2012

Date filed with the Board of Environmental Protection:

This Order prepared by Jane Gilbert, Bureau of Air Quality.