



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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

**Departmental  
Findings of Fact and Order  
Part 70 Air Emission License  
Renewal**

**FINDINGS OF FACT**

After review of the Part 70 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 Maine Department of Environmental Protection (Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

FACILITY	Irving Forest Products, Inc.
LICENSE TYPE	Part 70 License Renewal
NAICS CODES	321912, 321113, 321999
NATURE OF BUSINESS	Lumber Manufacturer
FACILITY LOCATION	24 Hall Hill Road, Dixfield, Maine

Irving Forest Products, Inc. (IFP) is a manufacturer of kiln-dried pine lumber. The facility consists of a sawmill, a planer mill, drying kilns, three boilers, fuel storage, and a maintenance garage.

IFP has the potential to emit more than 100 tons per year (TPY) of nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO) as well as more than 50 TPY of volatile organic compounds (VOC). Therefore, the source is a major source for criteria pollutants. IFP does not have the potential to emit more than 10 TPY of a single hazardous air pollutant (HAP) or more than 25 TPY of combined HAP. Therefore, the source is an area source for HAP.

**B. Emission Equipment**

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

**Boilers**

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Fuel Type, % sulfur	Manufacture Date	Install Date	Stack #
Boiler #1	12.0	wood, negligible	1959	1959	1
Boiler #2	12.0	wood, negligible	1960	1960	1
Boiler #4	46.2	wood, negligible	pre 1984	1994	3

Boiler #3 was removed from the facility in August 2011.

**Engines**

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Max. Firing Rate (gal/hr)	Fuel Type, % sulfur	Manufacture Date	Installation Date
Fire Pump #1	2.0	14.6	diesel, 0.0015%	1997	1997
Generator #1	1.2	8.8	diesel, 0.0015%	1999	2009

**Process Equipment**

Equipment	Capacity
Drying Kilns (1-11)	190,000 BF per kiln per charge
Cyclone #1 (Value Added Shavings)	6,000 tpy
Cyclone #2 (Planer Mill Shavings)	25,000 tpy
Cyclone #3 (Bagger Silo)	25,000 tpy
Cyclone #4 (Shavings Hopper)	25,000 tpy
Cyclone #5 (Planer Mill Chip Hopper)	6,000 tpy
Cyclone #6 (Boiler #1&#2 Fuel Silos)	1,000 tpy
Cyclone #7 (Boilers #1&#2 Fuel Input)	14,000 tpy
Parts Washer #1	10 gallons
Parts Washer #2	10 gallons

Drying Kilns #12 & #13 have been removed from the facility.

IFP has additional insignificant activities which do not need to be listed in the emission equipment tables above. The list of insignificant activities can be found

in the Part 70 license application and in Appendix B of *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended).

### C. Application Classification

The application for IFP does not include the licensing of increased emissions or the installation of new or modified equipment; therefore, the license is considered to be a Part 70 License renewal issued under 06-096 CMR 140 (as amended).

### D. Process Description

IFP is a manufacturer of kiln-dried pine lumber. The main mill includes a sawmill, a planer mill, 11 kilns, three boilers, fuel storage, and a maintenance garage.

Logs are delivered by truck to the mill and placed in inventory. They are 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 machines 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 where 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 IFP are kiln dried at the

plant. There are 11 kilns located at the mill. The kilns are track kilns each having a capacity of 190,000 board feet (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 are pneumatically conveyed to the planer 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 planer 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 Boilers #1 & #2 where sawdust is blown into a hopper before the wood is fed into the boiler.

IFP makes use of three wood-fired boilers designated Boilers #1, #2, and #4. These boilers are used to provide heat for the kilns as well as space heat for other buildings.

#### **E. General Facility Requirements**

IFP is subject to the following state and federal regulations listed below, in addition to the regulations listed for specific units as described further in this license.

CITATION	REQUIREMENT TITLE
06-096 CMR 101	Visible Emissions
06-096 CMR 102	Open Burning
06-096 CMR 103	Fuel Burning Equipment Particulate Emission Standard
06-096 CMR 105	General Process Source Particulate Emission Standard
06-096 CMR 106	Low Sulfur Fuel
06-096 CMR 109	Emergency Episode Regulation
06-096 CMR 110	Ambient Air Quality Standard
06-096 CMR 116	Prohibited Dispersion Techniques
06-096 CMR 117	Source Surveillance
06-096 CMR 130	Solvent Degreasers
06-096 CMR 137	Emission Statements
06-096 CMR 138	Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides
06-096 CMR 140	Part 70 Air Emission License Regulations
06-096 CMR 143	New Source Performance Standards
06-096 CMR 144	National Emission Standards for Hazardous Air Pollutants (NESHAP)
40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR Part 63, Subpart ZZZZ	National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR Part 63, Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
40 CFR Part 70	State Operating Permit Programs
40 CFR Part 75	Continuous Emissions Monitoring
40 CFR Part 98	Mandatory Greenhouse Gas Reporting

Note: CMR = Code of Maine Regulations  
CFR = Code of Federal Regulations

**F. Units of Measurement**

The following units of measurement are used in this license:

lb/hr	pounds per hour
lb/MMBtu	pounds per million British Thermal Units
MMBtu/hr	million British Thermal Units per hour
tpy	tons per year
BF	board feet
MMBF/yr	million board feet per year

## II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

### 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 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 emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

### B. NO<sub>x</sub> RACT (Reasonably Available Control Technology)

*Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides*, 06-096 CMR 138 (as amended) is applicable to sources that have the potential to emit quantities of NO<sub>x</sub> equal to or greater than 100 tons/year. It was determined that with the over-fire air system installed in 2005 as well as compliance with the annual tune-up requirement contained in 06-096 CMR 138, Boiler #4 would be meeting NO<sub>x</sub> RACT. Boilers #1 and #2 were determined to be meeting NO<sub>x</sub> RACT by complying with their respective lb/MMBtu emission limits. The NO<sub>x</sub> RACT requirements are incorporated in this renewal.

### C. VOC RACT (Reasonably Available Control Technology)

*Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds*, 06-096 CMR 134 (as amended) is applicable to sources that have the potential to emit quantities of VOC equal to or greater than 40 tons/year.

The boilers and Fire Pump #1 are exempt from VOC RACT because their emissions of VOC are the product of incomplete combustion per Section 1(C)(4) of the rule. The drying kilns are also exempted from VOC RACT per Section 1(C)(6). Therefore, there is no VOC emitting equipment at IFP subject to the requirements of 06-096 CMR 134.

#### **D. Compliance Assurance Monitoring (CAM)**

40 CFR Part 64, *Compliance Assurance Monitoring*, is applicable to units at major sources if the unit has emission limits, a control device to meet the limits, and pre-control emissions greater than 100 tons/year for any pollutant.

Boiler #4 has potential CO emissions greater than 100 tpy. However, IFP is not required to operate any add-on control device on Boiler #4 for the control of CO emissions. Therefore, Boiler #4 is not subject to CAM.

The kilns have potential emissions of VOC in excess of 100 tpy. However, there is no add-on control equipment required on the kilns for control of VOC. Therefore, the kilns are not subject to CAM.

There are no emission units at IFP subject to the requirements of 40 CFR Part 64.

#### **E. Boilers #1 and #2**

Boilers #1 and #2 (the Dillon Boilers) are wood-fired boilers with maximum design heat input capacities of 12.0 MMBtu/hr each. Both boilers exhaust to a common stack (Stack #1). Boilers #1 and #2 were manufactured in 1959 and 1960 respectively.

Boilers #1 and #2 also fire chipped wood pallets. The pallets are not to be coated, painted, or treated in any way.

##### **1. New Source Performance Standards (NSPS)**

Boilers #1 and #2 are not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 CFR Part 60, Subpart Dc due to their age. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more that are constructed after June 9, 1989.

##### **2. National Emissions Standards for Hazardous Air Pollutants (NESHAP)**

Boilers #1 and #2 are subject to NESHAP for Area Sources: Industrial/Commercial/Institutional Boilers contained in 40 CFR Part 63, Subpart JJJJJ. They are considered existing biomass-fired boilers. See Section II.G, titled NESHAP 40 CFR Part 63, Subpart JJJJJ, for more information.

3. Emission Limits and Streamlining

For Boilers #1 and #2, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below. The standards below apply to each boiler.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.57 lb/MMBtu	06-096 CMR 103, §2(A)(3)(a)	0.30 lb/MMBtu *
	0.30 lb/MMBtu	06-096 CMR 140, BPT (A-409-74-D-A/R)	
	3.6 lb/hr	06-096 CMR 140, BPT (A-409-71-I-A)	
PM <sub>10</sub>	3.6 lb/hr	06-096 CMR 140, BPT (A-409-70-A-I)	3.6 lb/hr
SO <sub>2</sub>	0.3 lb/hr	06-096 CMR 140, BPT (A-409-70-C-R)	0.3 lb/hr
NO <sub>x</sub>	0.40 lb/MMBtu	06-096 CMR 140, BPT (A-409-71-I-A)	0.40 lb/MMBtu
	4.8 lb/hr	06-096 CMR 140, BPT (A-409-71-I-A)	4.8 lb/hr
CO	6.0 lb/hr	06-096 CMR 140, BPT (A-409-71-I-A)	6.0 lb/hr
VOC	0.2 lb/hr	06-096 CMR 140, BPT (A-409-71-L-M)	0.2 lb/hr
Visible Emissions	30% opacity on a six (6) minute block average basis, except for no more than three (3) six (6) minute block avgs in a 3-hr period	06-096 CMR 101, §2(B)(5)(a)	30% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block avgs in a 3-hr period *
	30% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block avgs in a 3-hr period	06-096 CMR 140, BPT (A-409-70-A-I) 06-096 CMR 101, §2(B)(1)(3) (when only 1 boiler firing)	

Table Notes: \* streamlining requested

4. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boilers #1 and #2 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

5. Periodic/Parameter Monitoring

IFP shall monitor and record parameters for Boilers #1 and #2 as indicated in the following table.

Boilers #1 and #2			
Parameter	Units of Measure	Monitoring Tool/Method	Frequency
Wood fuel use	Tons	Calculated from steam flow	Monthly, and 12-month rolling total

6. CEMS and COMS

There are no CEMS or COMS required for Boilers #1 and #2.

**F. Boiler #4**

Boiler #4 (the IBC Boiler) is a wood-fired boiler with a maximum design heat input capacity of 46.2 MMBtu/hr. It exhausts to Stack #3.

Boiler #4 was manufactured and installed at Bates College in Lewiston, Maine prior to 1984 and moved to the IFP facility in 1994.

Boiler #4 also fires chipped wood pallets. The pallets are not to be coated, painted, or treated in any way.

1. Control Equipment

Particulate matter emissions from Boiler #4 are controlled by two multi-cyclone mechanical dust collectors in series.

2. New Source Performance Standards (NSPS)

Boiler #4 is not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 CFR Part 60, Subpart Dc due to its age. These standards apply to steam generating units with a heat input capacity of

10 MMBtu/hr or more that are constructed after June 9, 1989. Boiler #4 was manufactured prior to 1989.

3. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

Boiler #4 is subject to NESHAP for Area Sources: Industrial/Commercial/Institutional Boilers contained in 40 CFR Part 63, Subpart JJJJJ. It is considered an existing biomass-fired boiler. See Section II.G, titled NESHAP 40 CFR Part 63, Subpart JJJJJ, for more information.

4. NO<sub>x</sub> RACT

IFP exceeds 100 tpy of an annual total potential emissions of NO<sub>x</sub>. Therefore, IFP is subject to *Reasonably Available Control Technology for Facilities That Emit Nitrogen Oxides*, 06-096 CMR 138 (as amended). Boiler #4 is considered a “small boiler” as defined in this rule. The requirements of NO<sub>x</sub> RACT have been incorporated into this license.

5. Emission Limits and Streamlining

For Boiler #4, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.30 lb/MMBtu	06-096 CMR 103, §2(B)(4)(a)	0.27 lb/MMBtu *
	0.27 lb/MMBtu	06-096 CMR 140, BPT (A-409-71-I-A)	
	12.5 lb/hr	06-096 CMR 140, BPT (A-409-71-I-A)	12.5 lb/hr
PM <sub>10</sub>	12.5 lb/hr	06-096 CMR 140, BPT (A-409-71-I-A)	12.5 lb/hr
SO <sub>2</sub>	1.2 lb/hr	06-096 CMR 140, BPT (A-409-70-C-R)	1.2 lb/hr

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
NO <sub>x</sub>	0.40 lb/MMBtu	06-096 CMR 140, BPT (A-409-71-I-A)	0.40 lb/MMBtu
	18.5 lb/hr	06-096 CMR 140, BPT (A-409-71-I-A)	18.5 lb/hr
CO	23.1 lb/hr	06-096 CMR 140, BPT (A-409-71-I-A)	23.1 lb/hr
VOC	0.8 lb/hr	06-096 CMR 140, BPT (A-409-70-C-R)	0.8 lb/hr
Visible Emissions	30% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block avgs in a 3-hr period	06-096 CMR 101, §2(B)(1)(e)	30% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block avgs in a 3-hr period

Table Notes: \* streamlining requested

6. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boiler #4 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

7. Periodic/Parameter Monitoring

IFP shall monitor and record parameters for Boiler #4 as indicated in the following table.

Boiler #4			
Parameter	Units of Measure	Monitoring Tool/Method	Frequency
Wood fuel use	Tons	Calculated from steam flow or delivery records	Daily, monthly, and 12-month rolling total
Opacity	% opacity	non-specification opacity monitor	Monitor: Continuously Record: Once per 4-hour period
Oxygen	% O <sub>2</sub>	continuous monitor	Monitor: Continuously Record: Once per 4-hour period

**G. NESHAP 40 CFR Part 63, Subpart JJJJJ**

Boilers #1, #2, and #4 are subject to 40 CFR Part 63, Subpart JJJJJ. Notification forms and additional rule information can be found on the following website: <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

**A. Compliance Dates, Notifications, and Work Practice Requirements**

**1. Initial Notification of Compliance**

An Initial Notification submittal to EPA is due no later than January 20, 2014. [40 CFR Part 63.11225(a)(2)]

**2. Boiler Tune-Up Program**

(a) A boiler tune-up program shall be implemented to include the initial tune-up of applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(1)]

(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; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [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. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [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 (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [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 30 days of start-up. [40 CFR Part 63.11223(b)(7)]
- (c) After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [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 (called a Notification of Compliance Status) has been submitted.
1. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

<b>Boiler Category</b>	<b>Tune-Up Frequency</b>
New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below	Every 2 years
<b><i>New and Existing Oil, Biomass, and Coal fired Boilers with less frequent tune up requirements</i></b>	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
With a heat input capacity of <5MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

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 at high fire or typical operating load, 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 types and amounts of fuels 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)]

### 3. Energy Assessment

IFP is subject to the energy assessment requirement as follows:

- (a) A one-time energy assessment shall be performed by a qualified energy assessor on the applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(3)]
- (b) The energy assessment shall include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments. [40 CFR Part 63, Table 2(4)]
- (c) A Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(c)]

### 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.

#### H. Fire Pump #1 and Generator #1

Fire Pump #1 is rated at 2.0 MMBtu/hr. This engine was manufactured and installed in 1997. Generator #1 is rated at 1.2 MMBtu/hr. This engine was manufactured in 1999 and installed in 2009.

Both engines (Fire Pump #1 and Generator #1) fire diesel fuel with a sulfur content not to exceed 0.0015% and are limited to 500 hour/year of operation each.

##### 1. New Source Performance Standards (NSPS)

The engines are not subject to federal regulation 40 CFR Part 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, because both the Fire Pump #1 and the Generator #1 were manufactured prior to April 1, 2006.

##### 2. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

The federal regulation 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines* is applicable to Fire Pump #1 and Generator #1. These engines are considered an existing, emergency stationary reciprocating internal combustion engines at an area HAP source and they are not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE*) specifically does not exempt this unit from the federal requirements.

##### a. Emergency Definition:

Emergency stationary RICE means any stationary reciprocating internal combustion engine that meets all of the following criteria:

- (1) The stationary RICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc.

- (2) Paragraph (1) above notwithstanding, the emergency stationary RICE may be operated for any combination of the purposes specified below for a maximum of 100 hours per calendar year:
- (i) Maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
  - (ii) Emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
  - (iii) Periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
- (3) Paragraphs (1) and (2) above notwithstanding, emergency stationary RICE may be operated for up to 50 hours per calendar year in non-emergency situations. These 50 hours are counted as part of the 100 hours per calendar year for maintenance checks and readiness testing, emergency demand response, and periods of voltage deviation or low frequency, as provided in paragraph (2) above.

The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity, except provided in the following paragraphs:

- (i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power

is provided only to the facility itself or to support the local distribution center.

- (ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
  - (a) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
  - (b) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
  - (c) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
  - (d) The power is provided only to the facility itself or to support the local transmission and distribution system.
  - (e) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

Fire Pump #1 and Generator #1 shall be limited to the usage outlined in §63.6640(f) and therefore may be classified as an existing emergency stationary RICE as defined in 40 CFR Part 63, Subpart ZZZZ. Failure to comply with all of the requirements listed in §63.6640(f) may cause these engines to not be considered emergency engines and therefore subject to all the requirements for non-emergency engines.

b. 40 CFR Part 63, Subpart ZZZZ Requirements:

(1) Operation and Maintenance Requirements

	<b>Compliance Dates</b>	<b>Operating Limitations* (40 CFR §63.6603(a) and Table 2(d))</b>
Compression ignition (diesel, fuel oil) units:	No later than May 3, 2013	- Change oil and filter every 500 hours of operation or annually, whichever comes first; - Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and - Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

\* Note: Due to the 500 hour operation limit on each generator, the inspections and oil/filter changes shall be performed annually to meet the requirements of 40 CFR Part 63, Subpart ZZZZ.

The engines shall be operated and maintained according to the manufacturer's emission-related written instructions or facility shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]

(2) Optional Oil Analysis Program

IFP has the option of utilizing an oil analysis program which complies with the requirements of §63.6625(i) in order to extend the specified oil change requirement. If this option is used, IFP must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR §63.6625(i)]

(3) Non-Resetable Hour Meter Requirement

A non-resettable hour meter shall be installed and operated on each engine. [40 CFR §63.6625(f)]

(4) Startup Idle and Startup Time Minimization Requirements

During periods of startup the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed

for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [40 CFR §63.6625(h) & 40 CFR Part 63, Subpart ZZZZ Table 2d]

(5) Annual Time Limit For Maintenance and Testing

The engines shall each be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity unless the conditions in §63.6640(f)(4)(ii) are met). [40 CFR §63.6640(f)]

(6) Recordkeeping

Facility shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency. If the engines are operated during a period of demand response or deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in §63.6640(f)(4)(ii), Facility must keep records of the notification of the emergency situation, and the date, start time, and end time of generator operation for these purposes. [40 CFR §63.6655(e) and (f)]

(7) Requirements for Demand Response Availability Over 15 Hours Per Year (and greater than 100 brake HP)

If IFP operates or is contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in §63.6640(f)(4)(ii), the facility shall submit an annual report containing the information in §63.6650(h)(1)(i) through (ix). The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. The annual report must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)).

However, if the reporting form is not available in CEDRI at the time that the report is due, the written report must be submitted to the following address:

Director, Office of Ecosystem Protection  
U.S. Environmental Protection Agency  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

[40 CFR §63.6650(h)]

3. Emission Limits and Streamlining

For Fire Pump #1, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

<b>Pollutant</b>	<b>Applicable Emission Standard(s)</b>	<b>Origin and Authority</b>	<b>Licensed Emission Limit(s)</b>
PM	0.24 lb/hr	06-096 CMR 140, BPT	0.24 lb/hr
PM <sub>10</sub>	0.24 lb/hr	06-096 CMR 140, BPT	0.24 lb/hr
SO <sub>2</sub>	0.03 lb/hr (based on 0.0015% S limit, by weight)	06-096 CMR 140, BPT	0.03 lb/hr
NO <sub>x</sub>	8.82 lb/hr	06-096 CMR 140, BPT (A-409-70-C-R)	8.82 lb/hr
CO	1.90 lb/hr	06-096 CMR 140, BPT (A-409-70-C-R)	1.90 lb/hr
VOC	0.70 lb/hr	06-096 CMR 140, BPT (A-409-70-C-R)	0.70 lb/hr
Visible Emissions	20% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block avgs in a 3-hr period	06-096 CMR 101, §2(B)(1)(d)	20% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block avgs in a 3-hr period

Fire Pump #1 shall be limited to 500 hours of operation a year, based on a 12-month rolling total.

For Generator #1, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standard(s)	Origin and Authority	Licensed Emission Limit(s)
PM	0.14 lb/hr	06-096 CMR 140, BPT	0.14 lb/hr
PM <sub>10</sub>	0.14 lb/hr	06-096 CMR 140, BPT	0.14 lb/hr
NO <sub>x</sub>	5.29 lb/hr	06-096 CMR 140, BPT	5.29 lb/hr
CO	0.95 lb/hr	06-096 CMR 140, BPT	0.95 lb/hr
VOC	0.42 lb/hr	06-096 CMR 140, BPT	0.42 lb/hr
Visible Emissions	20% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block avgs in a 3-hr period	06-096 CMR 101, §2(B)(1)(d)	20% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block avgs in a 3-hr period

Generator #1 shall be limited to 500 hours of operation a year, based on a 12-month rolling total.

4. Emission Limit Compliance Methods

Compliance with the emission limits associated with Fire Pump #1 and Generator #1 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

5. Periodic/Parameter Monitoring

IFP shall monitor and record parameters for Fire Pump #1 and Generator #1 as indicated in the following table.

Parameter	Units of Measure	Monitoring Tool/Method	Frequency
fuel oil sulfur content	Percent, by weight	Fuel receipts from supplier	As fuel is purchased
Operating time	Hours	Hour Meter	Monthly and 12-month rolling total

## I. Drying Kilns

IFP utilizes 11 kilns to dry lumber before sale. Kilns #1 through #11 are track kilns each with rated capacities of 190,000 BF per cycle for 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.

IFP predominantly dries eastern white pine. IFP's Air Emission License amendment (A-409-77-1-A) established a kiln through-put restriction of 101.55 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, IFP is restricted to an annual VOC emission limit from kiln operations of no greater than 114.8 tons of VOC per year based on a twelve-month rolling total.

### Periodic/Parameter Monitoring

IFP shall monitor and record parameters for the kilns as indicated in the following table.

Parameter	Units of Measure	Monitoring Tool/Method	Frequency
Quantity of wood dried	BF	Logbook (paper or electronic)	Monthly & 12-month rolling total

## J. Cyclones

IFP utilizes a number of process cyclones throughout the facility for handling material (such as sawdust and shavings) that is generated by the wood processing equipment. Blowers convey the material 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 planer mill shavings cyclone. The planer 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.

1. Emission Limits and Streamlining

For the cyclones, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standard(s)	Origin and Authority	Licensed Emission Limit(s)
Visible Emissions	20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block avg in a 1-hr period	06-096 CMR 101, §2(B)(3)(d)	20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block avg in a 1-hr period

2. Periodic/Parameter Monitoring

IFP shall monitor and record parameters for the cyclones as indicated in the following table.

Parameter	Units of Measure	Monitoring Tool/Method	Frequency
Inspections of each cyclone	Each	Record in logbook	Monthly
Maintenance activity records	Each	Record in logbook	Maintain records documenting maintenance activities performed on the cyclones.

**K. Parts Washers**

IFP operates parts washers (degreaser units) as part of their maintenance activities. The parts washers at IFP use an aqueous-based solvent with a VOC content less than 5%. Based on the solvent used, these parts washers are exempt from *Solvent Degreasers*, 06-096 CMR 130 (as amended).

**L. Facility Annual Emissions**

1. Total Annual Emissions

IFP is licensed for the following annual emissions, based on a 12 month rolling total. The tons per year limits were calculated based on the following:

- Operation of Boilers #1, #2, and #4 at 100% for 8760 hours per year firing 50% moisture wood.
- 500 hours per year operation for Fire Pump #1.
- Maximum throughput in the kilns of 101.55 MMBF/yr.

**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>
Boilers #1	15.8	15.8	1.3	21.0	26.3	0.9
Boiler #2	15.8	15.8	1.3	21.0	26.3	0.9
Boiler #4	54.6	54.6	5.1	80.9	101.2	3.4
Fire Pump #1	0.1	0.1	0.1	2.2	0.5	0.2
Wood Drying Kilns	–	–	–	–	–	114.8
<b>Total TPY</b>	<b>86.3</b>	<b>86.3</b>	<b>7.8</b>	<b>125.1</b>	<b>154.3</b>	<b>120.2</b>

<b>Pollutant</b>	<b>Tons/year</b>
Single HAP	9.9
Total HAP	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 (CO<sub>2</sub>e).

Based on the facility's fuel use limit(s), 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, IFP is below the major source threshold of 100,000 tons of CO<sub>2</sub>e per year.

### III. AMBIENT AIR QUALITY ANALYSIS

IFP 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 (see license A-409-71-O-A, issued on 1/19/01). An additional ambient air quality analysis is not required for this Part 70 License.

### ORDER

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

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

The Department hereby grants the Part 70 License A-409-70-D-R pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 115 and subject to the standard and specific conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to IFP pursuant to the Department's preconstruction permitting requirements in 06-096 CMR 108 or 115 have been incorporated into this Part 70 license, except for such conditions that the Department 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 license 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 specific 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 affect 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 their renewal application.

Source	Citation	Description	Basis for Determination
Kilns	06-096 CMR 134	VOC RACT	Exempt per 06-096 CMR 134, Section (1)(C)(6)
All Boilers	06-096 CMR 134	VOC RACT	Exempt per 06-096 CMR 134, Section (1)(C)(4)
Fire Pump #1	06-096 CMR 138	NO <sub>x</sub> RACT	Fire Pump #1 is an emergency standby engine limited to 500 hrs/year.
All Boilers	06-096 CMR 145	NO <sub>x</sub> Control Program	Maximum heat input for each boiler less than 250 MMBtu/hr
All Boilers	40 CFR 60, Subpart D	NSPS for Fossil-Fuel-Fired Steam Generators	Maximum heat input for each boiler less than 250 MMBtu/hr
All Boilers	40 CFR 60, Subpart Db	NSPS for Industrial-Commercial-Institutional Steam Generating Units	Maximum heat input for each boiler less than 100 MMBtu/hr
All Boilers	40 CFR 60, Subpart Dc	NSPS for Small Industrial-Commercial-Institutional Steam Generating Units	Each of these boilers commenced construction prior to June 9, 1989.
Fire Pump #1	40 CFR 60, Subpart IIII	NSPS for Stationary Compression Ignition Internal Combustion Engines	Fire Pump #1 was constructed prior to the applicability date.
All Boilers	40 CFR Part 63, Subpart DDDDD	NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters	Facility is not a major source of HAP.
Facility	40 CFR Part 98	Mandatory Greenhouse Gas Reporting	Facility does not contain any source category listed in Tables A-3 or A-4 of the rule and facility does not have the potential to emit more than 25,000 metric tons of CO <sub>2e</sub> .

[06-096 CMR 140]

- (7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

- A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to 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 (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 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 38 M.R.S.A. §353-A.
- (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 M.R.S.A. § 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) Boilers #1 and #2**

**A. Allowable Fuels**

- 1. Boilers #1 and #2 are licensed to fire wood and chipped pallets. The chipped pallets fired may not have been painted, stained, or treated in any way. [06-096 CMR 140, BPT]
- 2. IFP shall maintain records of the quantity of fuel consumed on a monthly and 12-month rolling total basis. [06-096 CMR 140, BPT]

**B. Boilers #1 and #2 Emission Limits**

- 1. Boilers #1 and #2 shall each not exceed the following emission limits:

<b>Pollutant</b>	<b>lb/MMBtu</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	0.30	06-096 CMR 140, BPT (A-409-74-D-A/R)	Federally Enforceable
NO <sub>x</sub>	0.40	06-096 CMR 140, BPT (A-409-71-I-A)	Federally Enforceable

<b>Pollutant</b>	<b>lb/hr</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	3.6	06-096 CMR 140, BPT (A-409-71-I-A)	Federally Enforceable
PM <sub>10</sub>	3.6	06-096 CMR 140, BPT (A-409-71-I-A)	Federally Enforceable
SO <sub>2</sub>	0.3	06-096 CMR 140, BPT (A-409-70-C-R)	Federally Enforceable
NO <sub>x</sub>	4.8	06-096 CMR 140, BPT (A-409-71-I-A)	Federally Enforceable
CO	6.0	06-096 CMR 140, BPT (A-409-71-I-A)	Federally Enforceable
VOC	0.2	06-096 CMR 140, BPT (A-409-71-L-M)	Federally Enforceable

- 2. Visible emissions from Stack #1 shall not exceed 30% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute

block averages in a 3-hour block period. [06-096 CMR 140, BPT (A-409-70-A-I)]

C. Periodic Monitoring

IFP shall monitor and record parameters for Boilers #1 and #2 as indicated in the following table. [06-096 CMR 140, BPT]

<b>Boilers #1 and #2</b>			
<b>Parameter</b>	<b>Units of Measure</b>	<b>Monitoring Tool/Method</b>	<b>Frequency</b>
Wood fuel use	Tons	Calculated from steam flow	Monthly, and 12-month rolling total

D. Federal Regulations

Boilers #1 and #2 are subject to 40 CFR Part 63, Subpart JJJJJ, and IFP shall comply with all applicable requirements thereof.

(15) **Boiler #4**

A. Allowable Fuels

1. Boiler #4 is licensed to fire wood and chipped pallets. The chipped pallets fired may not have been painted, stained, or treated in any way. [06-096 CMR 140, BPT]
2. IFP shall maintain records of the quantity of fuel consumed on a monthly and 12-month rolling total basis. [06-096 CMR 140, BPT]

B. Boiler #4 Emission Limits

1. Boiler #4 shall not exceed the following emission limits:

<b>Pollutant</b>	<b>lb/MMBtu</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	0.27	06-096 CMR 140, BPT (A-409-71-I-A)	Federally Enforceable
NO <sub>x</sub>	0.40	06-096 CMR 140, BPT (A-409-71-I-A)	Federally Enforceable

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	12.5	06-096 CMR 140, BPT (A-409-71-I-A)	Federally Enforceable
PM <sub>10</sub>	12.5	06-096 CMR 140, BPT (A-409-71-I-A)	Federally Enforceable
SO <sub>2</sub>	1.2	06-096 CMR 140, BPT (A-409-70-C-R)	Federally Enforceable
NO <sub>x</sub>	18.5	06-096 CMR 140, BPT (A-409-71-I-A)	Federally Enforceable
CO	23.1	06-096 CMR 140, BPT (A-409-71-I-A)	Federally Enforceable
VOC	0.8	06-096 CMR 140, BPT (A-409-70-C-R)	Federally Enforceable

2. Visible emissions from Stack #3 (Boiler #4) shall not exceed 30% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour block period.  
 [06-096 CMR 101, §2(B)(1)(e)]

C. Control Equipment

IFP shall control particulate matter emissions from Boiler #4 by use of multiple centrifugal cyclones and shall maintain a log of all maintenance performed on each cyclone, as well as a log documenting the nature of all failures and corrective actions taken. [06-096 CMR 140, BPT]

D. Periodic Monitoring

IFP shall monitor and record parameters for Boiler #4 as indicated in the following table. [06-096 CMR 140, BPT]

Boiler #4			
Parameter	Units of Measure	Monitoring Tool/Method	Frequency
Wood fuel use	Tons	Calculated from steam flow or delivery records	Daily, monthly, and 12-month rolling total
Opacity	% opacity	non-specification opacity monitor	Monitor: Continuously Record: Once per 4-hour period
Oxygen	% O <sub>2</sub>	continuous monitor	Monitor: Continuously Record: Once per 4-hour period

E. NO<sub>x</sub> RACT

1. In accordance with 06-096 CMR 138, §3(L)(1), IFP shall perform an annual tune-up on Boiler #4.
2. In accordance with 06-096 CMR 138, §3(L)(2), IFP 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, IFP must periodically verify that the setting remains at that value.
  - d. If the oxygen level found is substantially higher than the value provided by the combustion unit manufacturer, IFP must improve the fuel and air mixing, thereby allowing operation with less air.

F. Federal Regulations

Boiler #4 is subject to 40 CFR Part 63, Subpart JJJJJJ, and IFP shall comply with all applicable requirements thereof.

(16) **NESHAP 40 CFR Part 63, Subpart JJJJJJ**

A. Compliance Dates, Notifications, and Work Practice Requirements

1. Initial Notification of Compliance

An Initial Notification submittal to EPA is due no later than January 20, 2014. [40 CFR Part 63.11225(a)(2)]

2. Boiler Tune-Up Program

(a) A boiler tune-up program shall be implemented to include the initial tune-up of applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(1)]

(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; not to

- exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [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. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [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 (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [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 30 days of start-up. [40 CFR Part 63.11223(b)(7)]
- (c) After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [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 (called a Notification of Compliance Status) has been submitted.
1. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

<b>Boiler Category</b>	<b>Tune-Up Frequency</b>
New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below	Every 2 years
<b><i>New and Existing Oil, Biomass, and Coal fired Boilers with less frequent tune up requirements</i></b>	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
With a heat input capacity of <5MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

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 at high fire or typical operating load, 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 types and amounts of fuels 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)]

3. Energy Assessment

IFP is subject to the energy assessment requirement as follows:

- (a) A one-time energy assessment shall be performed by a qualified energy assessor on the applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(3)]
- (b) The energy assessment shall include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or

operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments. [40 CFR Part 63, Table 2(4)]

- (c) A Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(c)]

**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.

**(17) Fire Pump #1 and Generator #1**

**A. Allowable Operation and Fuels**

1. Fire Pump #1 and Generator #1 are licensed to fire diesel fuel. [06-096 CMR 140, BPT (A-409-70-A-I)]
2. Fire Pump #1 and Generator #1 are each limited to 500 hours per year total operation, based on a 12-month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours. [06-096 CMR 140, BPT (A-409-70-A-I)]

**B. Fuel Sulfur Content**

1. The fuel oil sulfur content for Fire Pump #1 and Generator #1 shall be limited to 0.0015% sulfur. [06-096 CMR 140, BPT]
2. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 CMR 140, BPT]

- C. Emissions shall not exceed the following limits [06-096 CMR 140, BPT]  
**Enforceable by State-only:**

Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Fire Pump #1	0.24	0.24	0.03	8.82	1.90	0.70
Generator #1	0.14	0.14	neg	5.29	1.14	0.42

- D. Visible emissions from Fire Pump #1 and Generator #1 shall each not exceed 20% opacity on a 6-minute block average, except for no more than two (2) six (6) minute block averages in a 3-hour period. [06-096 CMR 101, §2(B)(1)(d)]
- E. Fire Pump #1 and Generator #1 shall meet the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, including the following:

1. No later than May 3, 2013, IFP shall meet the following operational limitations for Fire Pump #1 and Generator #1:
  - a. Change the oil and filter annually,
  - b. Inspect the air cleaner annually, and
  - c. Inspect the hoses and belts annually and replace as necessary.

A log shall be maintained documenting compliance with the operational limitations.  
[40 CFR §63.6603(a) and Table 2(d); and 06-096 CMR 140, BPT]

2. Oil Analysis Program Option  
IFP has the option of utilizing an oil analysis program which complies with the requirements of §63.6625(i) in order to extend the specified oil change requirement. If this option is used, IFP must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR §63.6625(i)]
3. Non-Resettable Hour Meter  
A non-resettable hour meter shall be installed and operated on Fire Pump #1 and Generator #1. [40 CFR §63.6625(f)]
4. Maintenance, Testing, and Non-Emergency Operating Situations
  - a. The engines shall each be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this

does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity unless the conditions in §63.6640(f)(4)(ii) are met). These limits are based on a calendar year. Compliance shall be demonstrated by a written log of all generator operating hours. [40 CFR §63.6640(f) and 06-096 CMR 115]

- b. IFP shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency. If the generators are operated during a period of demand response or deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in §63.6640(f)(4)(ii), the IFP must keep records of the notification of the emergency situation, and the date, start time, and end time of generator operation for these purposes. [40 CFR §63.6655(e) and (f)]
5. Operation and Maintenance  
The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or IFP shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]
  6. Startup Idle and Startup Time Minimization  
During periods of startup the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [40 CFR §63.6625(h) & 40 CFR Part 63, Subpart ZZZZ Table 2d]
  7. Requirements for Demand Response Availability Over 15 Hours Per Year (and greater than 100 brake hp)
    - a. If IFP operates or is contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in §63.6640(f)(4)(ii), the facility shall submit an annual report containing the information in

§63.6650(h)(1)(i) through (ix). The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. The annual report must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). However, if the reporting form is not available in CEDRI at the time that the report is due, the written report must be submitted to the following address:

Director, Office of Ecosystem Protection  
U.S. Environmental Protection Agency  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

[40 CFR §63.6650(h)]

(18) **Drying Kilns**

- A. IFP shall be limited to drying a total of 101,550,000 BF (101.55 MMBF) of lumber per year in the facility's drying kilns based on a 12-month rolling total. [06-096 CMR 115, BACT (A-409-77-1-A)]
- B. IFP 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 12-month rolling total basis. [06-096 CMR 115, BACT (A-409-77-1-A)]

(19) **Parts Washers**

IFP shall keep records of the SDS sheets for all solvent used in the degreasers to demonstrate the VOC content is below 5%. [06-096 CMR 140, BPT]

(20) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed an opacity of 20 percent, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20 percent in any one (1) hour. [06-096 CMR 101]

(21) **General Process Sources**

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

(22) **Parameter Monitor General Requirements** [06-096 CMR 140 and 117]

- A. Parameter monitors required by this license shall be installed, operated, maintained, and calibrated in accordance with manufacturer recommendations or as otherwise required by the Department.
- B. Parameter monitors required by this license shall continuously monitor data at all times the associated emissions unit is in operation. "Continuously" with respect to the operation of parameter monitors required by this license means providing equally spaced data points with at least one valid data point in each successive 15-minute period. A minimum of three valid 15-minute periods constitute a valid hour.
- C. Each parameter monitor must record accurate and reliable data. If the parameter monitor is recording accurate and reliable data less than 98% of the associated emissions unit 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.

**Enforceable by State-only**

(23) **Quarterly Reporting**

The licensee shall submit a Quarterly Report to the Bureau of Air Quality within 30 days after the end of each calendar quarter, detailing the following, for the control equipment and parameter monitors required by this license. [06-096 CMR 117]

- A. All control equipment downtimes and malfunctions;
- B. All parameter monitor downtimes and malfunctions;
- C. All excess events of emission and operational limitations set by this Order, Statute, state or federal regulations, as appropriate. The following information shall be reported for each excess event;
  - 1. Standard exceeded;
  - 2. Date, time, and duration of excess event;
  - 3. Amount of air contaminant emitted in excess of the applicable emission standard expressed in the units of the standard;
  - 4. A description of what caused the excess event;

5. The strategy employed to minimize the excess event; and
  6. The strategy employed to prevent reoccurrence.
- D. A report certifying there were no excess emissions, if that is the case.

(24) **Semiannual Reporting** [06-096 CMR 140]

- A. The licensee shall submit to the Bureau of Air Quality semiannual reports which are due on **January 31<sup>st</sup>** and **July 31<sup>st</sup>** of each year. The facility's designated responsible official must sign this report.
- B. The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date.
- C. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- D. 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.

(25) **Annual Compliance Certification**

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

The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the Department 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]

(26) **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:

- 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 by the date as specified in 06-096 CMR 137.

[06-096 CMR 137]

(27) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
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 M.R.S.A. §585-B, §§5	Mercury Emission Limit	Enforceable by State-only

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

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

[40 CFR, Part 82, Subpart F]

(29) **Asbestos Abatement**

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

(30) **Expiration of a Part 70 license**

- A. IFP shall submit a complete Part 70 renewal application at least 6 months prior, but no more than 18 months prior, to the expiration of this air license.
- B. Pursuant to Title 5 MRSA §10002, and 06-096 CMR 140, the Part 70 license shall not expire and all terms and conditions shall remain in effect until the Department takes final action on the renewal application of the Part 70 license. An existing source submitting a complete renewal application under 06-096 CMR 140 prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license. **Enforceable by State-only**

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

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Departmental  
Findings of Fact and Order  
Part 70 Air Emission License  
Renewal

(31) New Source Review

IFP is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emissions license and the NSR requirements remain in effect even if this 06-096 CMR 140 Air Emissions License, A-409-70-D-R, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 31 DAY OF December, 2013.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:

Patricia W. Aho for  
PATRICIA W. AHO, COMMISSIONER

**The term of this license shall be five (5) years from the signature date above.**

[Note: If a complete renewal application as determined by the Department, is submitted at least 6 months prior to expiration but no earlier than 18 months, then pursuant to Title 5 MRSA §10002, all terms and conditions of the Part 70 license shall remain in effect until the Department takes final action on the renewal of the Part 70 license.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/17/12

Date of application acceptance: 10/18/12

Date filed with the Board of Environmental Protection:

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

