



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

HUBER ENGINEERED WOODS, LLC)
AROOSTOOK COUNTY)
EASTON, MAINE)
A-62-70-F-R/A)

DEPARTMENT
FINDINGS OF FACT AND ORDER
PART 70 AIR EMISSIONS LICENSE
RENEWAL/AMENDMENT

After review of the air emission license renewal application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344, Section 590, 06-096 CMR 140 and the Department finds the following facts:

I. REGISTRATION

A. Introduction

| | |
|--------------------------|--|
| FACILITY | Huber Engineered Woods, LLC (Huber) |
| PART 70 LICENSE NUMBER | A-62-70-F-R/A |
| LICENSE TYPE | Part 70 License Renewal |
| NAIC CODES | 321219 |
| NATURE OF BUSINESS | Oriented Strand Board Manufacturer (OSB) |
| FACILITY LOCATION | 333 Station Road, Easton |
| DATE OF LICENSE ISSUANCE | |

B. Emission Equipment

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

| EMISSION UNIT ID | UNIT CAPACITY* | UNIT TYPE |
|-------------------------|--|-------------------|
| Boiler #1 | 84 MMBtu/hr (Biomass) 52.4 MMBtu/hr (Oil) | Fuel Burning |
| Dryer No. 3 | 21.25 oven dried tons/hr | Process Equipment |
| Dryer No. 4 | 21.25 oven dried tons/hr | Process Equipment |
| Dryer Furnace | 152 MMBtu/hr | Fuel Burning |
| Press | N/A | Process Equipment |
| Ink Jet Printer | N/A | Process Equipment |
| Blending and Forming | N/A | Process Equipment |
| Dust Handling Systems** | N/A | Process Equipment |
| Edge Spraying | N/A | Process Equipment |
| Emergency Generator | 2.6 MMBtu/hr | Fuel Burning |
| Emergency Fire Pump | 1.9 MMBtu/hr | Fuel Burning |
| Fuel Conveyor Systems | N/A | Process Equipment |
| Parts Washers | N/A | Process Equipment |

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143

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- * Unit capacities are nominal and listed for informational purposes only and are not intended as license restrictions.
- ** Includes Forming Fines Baghouse, Sander Baghouse, Sawline Baghouse, Trim & Grade Baghouse, and Dry Fuel Bin Baghouse.

Huber has additional insignificant activities which do not need to be listed in the emission equipment table above, including but not limited to green end activities (e.g., hot log ponds, sawing, debarking, chip piles, chip loading/unloading and chip handling) and OSB handling activities. The list of insignificant activities can be found in Huber's Part 70 air license renewal application dated January 2008 and in Appendix B of Part 70 Air Emission License Regulations, 06-096 CMR 140 (as amended).

C. Application Classification

The application for Huber is for renewal of their existing Part 70 Air License and subsequent amendments. Pursuant to Section 2(A) of 06-096 CMR 140, Huber has also requested a Part 70 Significant Modification to incorporate into its Part 70 Air License the relevant terms and conditions of the 06-096 CMR 115 New Source Review (NSR) licenses issued to Huber, including A-62-77-1-A issued January 26, 2007, A-62-77-2-A issued June 13, 2007, A-62-77-3-A issued August 8, 2008, and A-62-77-4-A issued April 5, 2010. Also, this license will include a few minor updates to Huber's Part 70 Air Emissions License. This license 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 and amendment to incorporate NSR requirements issued under 06-096 CMR 115 (as amended).

II. Facility and Emission Unit Description

A. Process Description

Huber owns and operates an oriented strand board (OSB) manufacturing facility in Easton, Maine. Logs are received at the plant by truck or rail and are stockpiled on site. The logs are soaked in hot water to thaw and clean the wood. They are then debarked and shaved into strands that are conveyed to green wood storage bins.

From the green wood storage bins, the strands are conveyed through rotary dryers where the strands are heated to reduce the moisture content. Heat for the drying process was historically provided by direct-fired wood burners and oil burners. In 2008, through Air Emissions License A-62-77-2-A, Huber underwent a project that addressed compliance with both the 40 CFR Part 63 Subpart DDDD "National Emission Standard for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products" (PCWP MACT) requirements and the 2004 version of 40 CFR Part 63 Subpart DDDDD "NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters" (Boiler MACT) that was in effect at the time of license issuance. To comply with the

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PCWP and Boiler (MACT) requirements, Huber installed systems that reduce emissions of volatile organic compounds (VOCs), Hazardous Air Pollutants (HAPs) and particulate matter using equipment design, air flow recovery/recirculation, and conventional pollution control.

The 2008 project was divided into two phases – MACT compliance (Phase One) and capacity expansion (Phase Two). Air License #A-62-77-2-A, issued June 13, 2007 pursuant to the New Source Review requirements for major modifications in 06-096 CMR Chapter 115, authorized Huber to undertake both Phases. Phase One is complete and Phase Two's schedule for construction, which is based more on market demand, is currently unknown. Phase Two (the capacity expansion) will be achieved by modifying the forming line and press systems. The green end will be modified as necessary to provide the raw material to meet the increased press demand and surge capacity of the Drying System installed during Phase One.

Phase One of the project included the following major elements:

- Replaced two existing dryers and dedicated burners with two new low temperature dryers equipped with exhaust gas recirculation, along with associated new drying system cyclones, screens, and conveyors. The new dryers (Dryers #3 and #4) have inherently low HAP and VOC emissions due to their design and will comply with the Production Based Compliance Option (PBCO) under the PCWP MACT.
- The two new dryers installed in 2008 were not equipped with burners. Instead, heat to the new dryers is provided by a new biomass-fired furnace. At times, if wood flakes are not available for drying, the furnace may continue to operate by "subloading" infeed to the dryers with water. This design prevents the need to vent the furnace exhaust to atmosphere, allowing the furnace exhaust emissions to be treated by the dry Electrostatic Precipitator (ESP). (The furnace and two new dryers together are referred to as the "Drying System").
- The exhaust from the new press enclosure (complying with the wood products enclosure requirements under the PCWP MACT) is routed to the dryer furnace and/or the existing boiler for combustion of the Hazardous Air Pollutants (HAPs).
- The existing Boiler #1 was upgraded to improve efficiency and potentially increase steam production. The boiler also receives some or all of the press exhaust air stream as combustion air.
- Replaced the existing fuel feed system (made up of belt conveyors) with a new system to feed both the new furnace and the existing boiler with enclosed trough, drag chain conveyors.
- Replaced the existing Boiler Electrified Filter Bed (EFB) and the Dryer System Wet Electrostatic Precipitator (WESP), and installed a single dry Electrostatic Precipitator (ESP) for control of particulate from the Dryer System and Boiler #1. The ESP ensured Boiler #1 would meet the applicable Boiler MACT standards in effect at that time.

Huber installed a biomass-fired furnace to provide direct heat for two low temperature dryers. The exhaust from the furnace is routed directly into the dryers for direct contact drying of the wood strands. After passing through the dryers, the dried strands are screened and stored in dry chip storage bins. From the dry storage bins, the strands are fed into blending drums where binders and wax are applied to the wood. The resinated strands are then oriented into loosely formed mats and hot pressed to produce 8-foot by 16-foot sheets.

The pressed sheets are then trimmed into panels of the desired dimensions. The panels may also be sanded and/or provided with a tongue-and-groove edge, quality stamped and/or branded. Some are edge sprayed and labeled with an ink jet printer. To prepare for shipment, the panels are stacked and strapped together. The finished product is then shipped to market by truck or rail.

B. Minor updates

Huber has requested to include the following to update the air emissions license:

- Mechanical Separator – The Mechanical Separator is an emergency wood flake “dropout box” equipped with a bypass vent which serves as a fire and explosion protection device for the ESP. This device is located between the dryer cyclone and the dry ESP (ESP). The Mechanical Separator itself is a “drop out box” designed to capture carry-over of flakes from the dryer cyclones during upset conditions. Under certain upset conditions, i.e. cyclone plug, the separator protects the ESP by capturing flake carry over during the dryer shutdown process reducing the risk of a fire in the ESP. The Separator is also equipped with an emergency abort vent. If oxygen levels entering the ESP are high, creating a fire risk, the lid on the Mechanical Separator lifts and exhausts the dryer air to atmosphere. This design provides the ESP with protection from explosion and/or fire. If the Mechanical Separator were not utilized, ESP programming would de-energize the ESP potentially causing an opacity event above the license limit. The types of malfunctions that may cause oxygen levels to rise above the ESP safety level include, but are not limited to, boiler fan malfunctions, dryer or furnace fuel delivery issues, or other unexpected equipment or computer malfunctions in the boiler or dryer systems. Although these events are infrequent and brief, Huber has requested this safety practice to be included in its air emissions license. The duration of these events will be tracked and recorded and will be included in the dryer furnace vent allowance specified in Condition (15) D. The duration of preventive maintenance testing periods of the vent for maintenance purposes do not need to be included in the Condition (15) D allowance when the dryer system is not operating, i.e. furnace either down or venting through the dryer furnace vent.
- Purge Vents – Each Dryer system is equipped with Purge Vents which are designed as emergency explosion control protection for the ESP. In the event of a power loss, the Dryer System goes into an emergency shutdown to divert shutdown emissions from the

ESP. The purge vents are also used after the dryers cease processing flakes as part of a controlled shutdown to cool down the Dryers while the Dryer furnace abort stack is open.

- ZIP Paper – Huber manufactures a product called ZIP System® roof and wall sheathing which is OSB with a paper overlay. The paper is pretreated with an adhesive polymer. The facility’s trimmings waste, as with its other products, are sent to and combusted in Boiler #1 and the Dryer Furnace. The Material Safety Data sheets for paper overlays used at the facility state that there are no hazardous chemicals present above the de minimus levels in 29 CFR Part 1910.1200(g)(2)(i)(C)(1) of the Occupational Safety and Health Administration (OSHA) Hazardous Communication Standard.
- Tub Grinder – Huber proposes to begin operation of a tub grinder to grind oversized logs, OSB, and other wood based materials. BPT requires Huber to use wet suppression as needed to control fugitive dust emissions from the tub grinder. The tub grinding process will not exceed the visible emissions limit for general process sources of 20% opacity 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.
- Baghouses Venting Inside – Baghouses are operated which vent inside of the Main Process Building, Huber proposes to include the Screener Baghouse and the Mat Saw Baghouse in the air license for purposes of clarity. Although not subject to Specific Condition (21), periodic visual inspections for dust accumulation inside the building may be performed to confirm performance of these baghouses which vent indoors.
- Include in the air license a 1.6 MMBtu/hr diesel fired emergency fire pump.

C. Boiler # 1

Unit Size and Age

Boiler #1 was manufactured by Wellons, Inc. with a maximum design heat input of 84 MMBtu/hr firing wood and processed wood waste and 52.4 MMBtu/hr firing No. 2 fuel oil. Boiler #1 provides steam for use in Huber’s manufacturing process. Huber also provides steam from this boiler to the McCain’s manufacturing facility which is adjacent to Huber. The boiler was installed in 1982, prior to the New Source Performance Standards (NSPS) Subpart Dc applicability date. The boiler underwent a BACT review as part of the 1982 PSD permitting of the plant and as a result of the 2008 permitting of the MACT compliance project, the boiler is now subject to 40 CFR Part 60 Subpart Dc.

Boiler #1 was modified during the 2008 project to improve efficiency and potentially increase steam production. Boiler capacity was not increased above existing name plate capacity of 84 MMBtu/hr. The project included the installation of a new Programmable Logic Controller system on the boiler to improve performance and control of the system. In addition, the fuel feed system was replaced to provide more uniform and controlled fuel feed to the boiler. The boiler is licensed to combust various fuels, including bark, wood, and OSB process waste, including hogged trim, sander dust, wood fines, paper,

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cardboard, ZIP paper, wood pallets, used oil/grease, rags, vehicle wash water, binders, wax, release agent, stamp ink, edge seals, other non-hazardous OSB process wastes, boiler blowdown water, and #2 fuel oil. When compliance is required to meet 40 C.F.R. Part 63, Subpart DDDDD (Boiler MACT), Huber will only burn things that comply with the rule per last year's revisions to the solid waste, CISWI, and Boiler MACT rules. Propane, oil, and kerosene may continue to be used for cold startup ignition. The oil burner is also used as backup during wood fuel delivery or quality events. The oil burner may operate for periods during wood fuel system difficulties, independently or in conjunction with the wood furnaces, during winter periods when OSB is not being produced, to stabilize boiler operations, or to maximize heat output during very cold weather. In addition, a portion of the press exhaust gases (with the percentage of press exhaust going to the boiler or routed to the dryer furnace being based on operating conditions) is routed to the boiler firebox for combustion of 90% or greater of total HAP as defined under the PCWP MACT. In order to comply with MACT, BACT, and BPT regulations and requirements, the PM and PM₁₀ emissions from the boiler will be controlled with the same ESP as that used for the new Dryer System.

NOx RACT Requirements

Huber's Boiler #1 is subject to 'Section 4 Phase 1 Mid-Size Boilers' standards of 06-096 CMR 138 which established a NOx RACT limit of 0.40 lb/MMBtu for mid-size boilers licensed to fire biomass and oil. Stack test data for Boiler #1 previously submitted to the DEP confirms that this boiler meets the 0.40 lb/MMBtu NOx RACT emission limit. Compliance with the NOx emission limits shall be demonstrated through stack testing of only Boiler #1 emissions in accordance with 40 C.F.R. Part 60, App. A, Method 7E upon request by the Department. [06-096 CMR 115, BPT]

BPT/BACT Limits

The BACT analysis submitted by Huber as part of its application for a New Source Review amendment, A-62-77-2-A issued June 13, 2007 included identification of the control technologies currently in use for reducing emissions, a review of vendor literature, as available, and a review of the RACT/BACT/LAER Clearinghouse (RBLC). For BACT purposes, technical feasibility, control effectiveness, and economics were considered in selecting BACT for new or modified equipment. For purposes of BACT (now considered BPT for this renewal Part 70 Air Emissions License) the following potential control technologies were considered for Boiler #1 and the new dryer system:

| POLLUTANT | CONTROL TECHNOLOGY | LOCATION OF CONTROL | APPLICABLE EMISSION UNITS |
|------------------|---|---------------------|---|
| NO _x | Selective Catalytic Reduction (SCR) | Post-Process | Dryer, Boiler |
| | Selective Non-Catalytic Reduction (SNCR) | Post-Process | Dryer, Boiler |
| | Staged Combustion (includes Overfire Air / Ecotube®) | Combustion Chamber | Dryer, Boiler |
| | Selective Catalytic Oxidation and Scrubbing (SCONO _x) | Post-Process | Dryer, Boiler |
| | Water/Steam Injection | Combustion Chamber | Dryer, Boiler |
| | Flue Gas Recirculation (FGR) | Combustion Chamber | Dryer, Boiler |
| | Low NO _x Burners | Combustion Chamber | Dryer, Boiler |
| | Low Excess Air | Combustion Chamber | Dryer, Boiler |
| | Good Design and Operation or Good Combustion Practices | In-Process | Dryer, Boiler |
| CO | Catalytic Oxidation | Post-Process | Dryer, Boiler |
| | Regenerative Thermal Oxidation (RTO) | Post-Process | Dryer, Boiler |
| | Regenerative Catalytic Oxidation (RCO) | Post-Process | Dryer, Boiler |
| | Staged Combustion (includes Overfire Air / Ecotube®) | Combustion Chamber | Dryer, Boiler |
| | Low Temperature Dryers/Exhaust Gas Recirculation | In-Process | Dryers |
| | Good Design and Operation or Good Combustion Practices | In-Process | Dryer, Boiler |
| VOC | Catalytic Oxidation | Post-Process | Dryers, Boiler |
| | Regenerative Thermal Oxidation (RTO) | Post-Process | Dryers, Boiler, Baghouses, Ink Jet Printer |
| | Regenerative Catalytic Oxidation (RCO) | Post-Process | Dryers, Boiler, Baghouses, Ink Jet Printer |
| | Staged Combustion (includes Overfire Air / Ecotube®) | Combustion Chamber | Dryer, Boiler |
| | Biofiltration | Post-Process | Dryers, Boiler, Baghouses, Ink Jet Printer |
| | Low Temperature Dryers/Exhaust Gas Recirculation | In-Process | Dryers |
| | Material Use – Low VOC Ink | In-Process | Ink Jet Printer |
| | Good Design and Operation or Good Combustion Practices | In-Process | Dryers, Boiler, Baghouses, Ink Jet Printer |
| PM ₁₀ | Baghouse | Post-Process | Forming Line, Sander, Sawline, Dry Fuel Bin |
| | Dry Electrostatic Precipitator (Dry ESP) | Post-Process | Dryers, Boiler |
| | Wet Electrostatic Precipitator (WESP) | Post-Process | Dryers, Boiler |
| | Multiclone | Post-Process | Dryers, Boiler |
| | Good Design and Operation or Good Combustion Practices | In-Process | Dryers, Boiler, Baghouses |
| SO ₂ | Wet Scrubber | Post-Process | Dryers, Boiler |
| | Good Design and Operation | In-Process | Dryers, Boiler |

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Particulate Matter (PM/PM₁₀) BPT

Several PM control technologies were evaluated and described in greater detail in Air Emission License Amendment, A-62-77-2-A. BACT for PM/PM₁₀ was determined to be a dry ESP and a 0.07 lb/MMBtu emission limit which is lower than most comparable entries in the RBLC and is more stringent than the NSPS Subpart Dc limit of 0.10 lb/MMBtu. The Department may reevaluate the lbs/MMBtu limit based on actual stack test results. A limit of 22.0 lbs/hour is appropriate for the combined emissions of Boiler #1 and the Dryer System. This limit is comparable to other BACT limits established by the Department for similar equipment and is now considered BPT for this renewal Part 70 Air Emissions License.

NO_x BPT

Several NO_x control technologies were evaluated for BACT and are described in greater detail in Air Emission License Amendment, A-62-77-2-A. The control technologies evaluated included Selective Catalytic Reduction (SCR), Selective Non-catalytic Reduction (SNCR), Ecotube Systems, Staged combustion, SCONOX, Water/Steam Injection, Low NO_x burners, and Low Excess Air.

BPT for NO_x is the use of staged combustion and combustion controls to meet an emission limit of 0.40 lb/MMBtu which is below several of the recent RBLC entries for similar sized wood-fired units.

CO BPT

Several CO control technologies were evaluated for BACT and are described in greater detail in Air Emission License Amendment, A-62-77-2-A. The control technologies evaluated included Catalytic oxidation, Regenerative Thermal Oxidizers (RTO), and Ecotube Systems.

CO BPT is good staged combustion practices and an emission limit of 111.58 lb/hr for Boiler #1 and Dryer System emissions combined.

SO₂ BPT

Add-on controls for SO₂ involve wet scrubbing technology. Biomass is an inherently low sulfur fuel. In addition, Huber proposes to use limited amounts of low sulfur No. 2 fuel oil. The uncontrolled level of SO₂ concentration is comparable to SO₂ concentrations found in post-control exhaust streams. The use of scrubbing technology as an add-on control was deemed to have minimal potential for SO₂ emission reduction and was not

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considered BACT in the 2007 NSR license. For this reason, scrubbing technology is not considered feasible for the boiler.

BPT for SO₂ is the use of low sulfur fuels, including biomass and No. 2 fuel oil, and an emission limit of 5.9 lbs/hr for Boiler #1 and Dryer System emissions combined when firing only biomass. BPT for SO₂ from oil use is the use of fuel which meets the criteria in ASTM D396 for #2 fuel oil. The ASTM D396 criteria for #2 fuel oil complies with the 0.5% by weight sulfur content requirement found in 40 CFR Part 60 Subpart Dc.

VOC BPT

Potential emission controls listed for VOC from the boiler include those options presented for CO. The technical feasibility of applying these technologies for reduction of VOC from the boiler is the same as those for CO. Therefore, catalytic oxidation and RTO technology are considered technically infeasible for reducing VOC emissions from the boiler. Biofiltration was also listed as a potential VOC removal technology. The VOC emissions from the boiler are very low compared with typical VOC emissions considered for biofiltration. The amount of VOCs in the boiler gas would not be sufficient to serve as an energy source for the microbial population in a biofilter. Therefore, a biofilter is considered technically infeasible for removal of VOC from the boiler exhaust.

VOC BPT is good combustion practices and an emission limit of 21.8 lbs/hr for Boiler #1 and Dryer System emissions combined.

Streamlining

PM

- (i) 06-096 CMR 103 establishes a PM emission rate of 0.08 lb/MMBtu.
- (ii) BPT establishes an applicable PM emission standard of 0.07 lb/MMBtu.

Huber accepts streamlining for the PM standards of 06-096 CMR 103 and BPT. The BPT PM standard is more stringent than the 06-096 CMR 103 limit. The BPT limit is therefore the only standard of the two included in this license.

PM₁₀

BPT establishes the only applicable PM₁₀ lb/MMBtu emission limit of 0.07 lb/MMBtu.

No streamlining requested.

SO₂

- (i) 06-096 CMR 106 limits the sulfur content (by weight) of oil to 2.0%.
- (ii) NSPS Subpart Dc limits the sulfur content of fuel oil to 0.5% or less.
- (iii) BPT establishes an applicable SO₂ emission standard of 5.9 lb/hr for the exhaust from Boiler #1 and the Dryer System combined while burning wood and use of fuel which meets the criteria in ASTM D396 for #2 fuel oil.

Huber accepts streamlining for the SO₂ standards of 06-096 CMR 106 and NSPS Subpart Dc and BACT. The NSPS Subpart Dc and BPT SO₂ standards are more stringent than the 06-096 CMR 106 limit. The NSPS Subpart Dc and BPT limits are therefore the only standards included in this license.

NO_x

- (i) 06-096 CMR 138 establishes a NO_x emission limit of 0.40 lb/MMBtu.
- (ii) BPT establishes an applicable NO_x emission standard of 0.40 lb/MMBtu. No streamlining requested.

CO

BPT establishes the only applicable CO emission limit for the exhaust for Boiler #1 and the Dryer System combined of 111.58 lb/hr. **No streamlining requested.**

VOC

BPT establishes the only applicable VOC lb/hr emission limit for Boiler #1 and the Dryer System combined of 21.80 lb/hr. **No streamlining requested.**

Opacity

- (i) MEDEP Chapter 101, Section 2(B)(5) establishes an opacity limit for combined stack emissions of 30% on a 6-minute block average basis except for no more than three 6-minute block averages in a 3-hour period.
- (ii) NSPS Subpart Dc establishes an opacity limit of 20% on a 6-minute block average, except for one 6-minute period per hour of not more than 27% opacity, and except for periods of startup, shutdown, and malfunction.

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Huber accepts streamlining for the opacity standards of 06-096 CMR 101 and NSPS Subpart Dc. The NSPS Subpart Dc standard is more stringent than the 06-096 CMR 101 limit. The NSPS Subpart Dc limit is therefore the only standard of the two included in this license.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

Boiler #1 is subject to 40 C.F.R. Part 63, Subpart DDDDD, the NESHAP for Industrial, Commercial and Institutional Boilers and Process Heaters (“Boiler MACT”) published in the federal register on February 21, 2011. EPA revised the rule and published these revisions on January 13, 2013 in the Federal Register. Existing sources must be in compliance within three (3) years from the date of publication of the final rule in the Federal Register (approximately early 2016). Huber may submit an application under the Part 70 Administrative Revision provisions of 06-096 CMR 06-096 CMR 140 to incorporate the updated Subpart DDDDD requirements into this license. Huber will meet the applicable requirements of the final regulation when required.

Parameter Monitors

NSPS Subpart Dc requires Boiler #1 to be equipped with a continuous emission monitoring system for opacity. New Source Review Amendment # A-62-77-2-A also required Huber to monitor secondary voltage on each field, primary current on each field and secondary current on each field of the ESP controlling emissions from Boiler #1 and the Dryer System.

Stack Testing

When required by this license, or otherwise upon request of the Department, compliance with the limits set forth shall be determined by a stack test conducted in accordance with the following stack test methods:

| Pollutant | Compliance Method |
|------------------|---|
| PM | 40 C.F.R. Part 60, Appendix A, Method 5 |
| PM ₁₀ | 40 C.F.R. Part 60, Appendix A, Method 5 or Method 201/201A 40 C.F.R. Part 51, Appendix M |
| NO _x | 40 C.F.R. Part 60, Appendix A, Method 7E |
| SO ₂ | 40 C.F.R. Part 60, Appendix A, Method 6C |
| VOC | 40 C.F.R. Part 60, Appendix A, Method 25 or 25A |
| CO | 40 C.F.R. Part 60, Appendix A, Method 10 |

D. Dryer System (Dryer #3, Dryer #4 and Dryer Furnace)

The 2008 project included the installation of two new low temperature dryers equipped with exhaust recirculation. The maximum production rate for each dryer is 21.25 Oven

Dried Tons per hour (ODT/hr) and inlet temperatures for the low temperature dryers are several hundred degrees less than conventional dryers. A biomass-fired furnace with a nominal heat input rating of 152 MMBtu/hr (at 50% moisture content fuel) provides direct heat to the dryers. The furnace may fire at slightly higher rates for short periods depending on air flows and fuel moisture content. The furnace is fired with bark, wood, and OSB process waste, including hogged trim, sander dust, wood fines, paper, cardboard, wood pallets, used oil/grease, vehicle wash water, binders, wax, release agent, stamp ink, edge seals, and other non-hazardous OSB process wastes. Propane, oil, or kerosene may be used for cold startup ignition. Press exhaust is also fired in the furnace and/or Boiler #1 for control of HAPs.

This type of dryer system generates inherently low VOC and HAP emissions when compared with conventional high temperature OSB wafer dryers, as is evidenced by the emissions compliance tests, which show compliance with the PCWP MACT production based compliance option. Exhaust from the dryers is routed through a dry electrostatic precipitator (ESP) for PM and PM₁₀ removal. The ESP also serves Boiler #1. Except for startups, shutdowns and malfunctions, the Dryer System will not operate if Boiler #1 is offline. Also, the Dryer Furnace is equipped with a by-pass vent that may be used in the event of an equipment malfunction, including over or under-pressure situations. The vent may also be used when maintenance is performed on the dryers or the furnace is in idle condition. Huber will maintain records of the date, time, duration and cause for use of the vent and will meet the time restrictions per Condition (15) D.

PM and PM₁₀ BPT

Several PM control technologies were evaluated for BACT and described in greater detail in Air Emission License Amendment, A-62-77-2-A. BPT for the Dryer System is routing its exhaust through the dry ESP and meeting a 22.0 lb/hr emission limit for the Drying System and Boiler #1 emissions combined. This limit is comparable to BPT and BACT limits established by the Department for similar equipment.

NO_x BPT

Several NO_x control technologies were evaluated for BACT and described in greater detail in Air Emission License Amendment, A-62-77-2-A, including SCR, SNCR, Ecotube Systems, Staged combustion, SCONO_x, Water/Steam Injection, Low NO_x burners, and Low Excess Air

BPT for NO_x from the Dryer System is staged combustion air and good combustion practices and an emission limit of 38.84 lb/hr for the Dryer System emissions. This limit is comparable to the BACT limit established by the Department for similar equipment. Because the Dryer System furnace is not a boiler, it is not possible to determine Btu input based on steam output and f factors. Therefore, it is not feasible to impose a lb/MMBtu limit as BACT. A lb/hour BACT limit for NO_x is consistent with a number of other

recent BACT determinations listed in EPA's RBLC for similar units. This BACT limit, established through New Source Review Air license, A-62-77-2-A, is considered BPT for this Part 70 air license renewal.

CO BPT

Several CO control technologies were evaluated for BACT and described in greater detail in Air Emission License Amendment, A-62-77-2-A, including Catalytic Oxidation, Regenerative Catalytic Oxidation (RCO), Regenerative Thermal Oxidation (RTO), and Ecotube Systems.

BPT for CO is good combustion practices using staged combustion with overfire air and an emission limit of 111.58 lb/hr emission limit for Boiler #1 and Dryer System emissions combined, which falls within the range of limits listed in the RBLC.

SO₂ BPT

Huber evaluated the use of a wet scrubber for BACT in Air Emissions License A-62-77-2-A. While technically feasible, environmental considerations such as additional fresh water usage and waste disposal ponds are significant drawbacks given the limited amount of SO₂ reduction anticipated and costs per ton removed was not economically feasible.

BPT for the Dryer System is good combustion practices with low sulfur fuel (i.e., wood) and an emission limit of 5.9 lb/hr for Boiler #1 and Dryer System emissions combined when firing only biomass.

VOC BPT

Several VOC control technologies were evaluated and are described in greater detail in Air Emission License Amendment, A-62-77-2-A, including Biofiltration, RCO, RTO, and Low Temperature Dryers.

VOC BPT for the dryer system is purchasing a mix of primarily hardwood tree species and use of low temperature dryer technology with exhaust gas recirculation with a maximum hourly VOC emission rate of 21.80 lb/hr from the dry ESP. This limit includes the boiler and the Dryer System, and any residual VOCs from the press that are not destroyed in the dryer furnace or boiler.

Streamlining

The maximum production rate of the new dryers is a combined total of 42.5 oven dried tons per hour. A new biomass-fired furnace with a nominal heat input of 152 MMBtu/hr (at 50% moisture content fuel) will provide direct heat to the dryers. The Dryer Furnace

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will not produce any steam and, therefore, is not subject to 06-096 CMR 103, NSPS 40 CFR Part 60, Subpart Db, or 40 CFR Part 63 Subpart DDDDD.

PM

- (i) 06-096 CMR 105 establishes a PM emission rate of 31.5 lb/hr from the dryers based on the process weight input rate for the dryers of 42.5 Oven Dried Tons (ODT) per hour and the following formula:

$$\text{Emission rate (lb/hr)} = 17.31 * (\text{process weight rate})^{0.16}$$

- (ii) BPT establishes an applicable PM emission standard for the exhaust of the Dryer System and Boiler #1 combined, of 22.0 lb/hr.

Huber accepts streamlining for the PM standards of 06-096 CMR 105 and BPT. The BPT PM standard is more stringent than the 06-096 CMR 105 limit. The BPT limit is therefore the only standard of the two included in this license.

PM₁₀

BPT establishes the only applicable PM₁₀ lb/MMBtu emission limit for the exhaust of the Dryer System and Boiler #1 combined of 22.0 lb/hr. **No streamlining requested.**

SO₂

BPT establishes the only applicable SO₂ emission limit for the exhaust of the Dryer System and Boiler #1 combined of 5.9 lb/hr (for biomass fuels). **No streamlining requested.**

NO_x

BPT establishes the only applicable NO_x emission limit for the exhaust of the Dryer System of 38.84 lb/hr. **No streamlining requested.**

CO

BPT establishes the only applicable CO emission limit for the exhaust from Boiler #1 and the Dryer System combined of 111.58 lb/hr. **No streamlining requested.**

VOC

BPT establishes the only applicable VOC lb/hr emission standard for the exhaust of the Dryer System and Boiler #1 combined of 21.80 lb/hr. **No streamlining requested.**

Opacity

- (i) 06-096 CMR 101, Section 2(B)(5) establishes an opacity limit for combined stack emissions of 30% on a 6-minute block average basis except for no more than three 6-minute block averages in a 3-hour period.
- (ii) BPT establishes an opacity limit of 20% on a 6-minute block average, except for one 6-minute period per hour of not more than 27% opacity, except for periods of startup, shutdown, and malfunction.

Huber accepts streamlining for the opacity standards of 06-096 CMR 101 and BPT. The BPT standard is more stringent than the 06-096 CMR 101 limit and is therefore the only standard of the two included in this license.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The Dryer System is subject to 40 C.F.R. Part 63, Subpart DDDD, the NESHAP for Plywood and Composite Wood Products (“PCWP MACT”). The Dryers are subject to 40 C.F.R. Part 63, Subpart DDDD, the NESHAP for Plywood and Composite Wood Products (PCWP MACT). Compliance for the Press has been established and demonstrated by press enclosure design and by routing the exhaust to the flame zones of the dryer and/or boiler furnaces. Compliance for the Dryers has been demonstrated through stack testing and the establishment of controlling parameters to meet the Production Based Compliance option provided in the PCWP MACT) The controlling parameters are identified in Specific Condition (16)H. Also, a Startup, Shutdown, Malfunction Plan is required by the PCWP MACT standard to satisfy the general duty to minimize emissions, ensure that malfunctions are corrected as soon as practicable to minimize excess emissions of hazardous air pollutants, and reduce the reporting burden associated with periods of startups, shutdowns, and malfunctions (including corrective action taken to restore malfunctioning processes, and pollution control equipment to its normal or usual manner of operation.

Parameter Monitors

The dry ESP controls particulate emissions from both the Dryer System and Boiler #1. NSPS Subpart Dc requires Boiler #1 to be equipped with a continuous emission monitoring system for opacity. Because this monitor is located after the ESP it monitors the combined emissions of Boiler #1 and the Dryer System. New Source Review Amendment # A-62-77-2-A also requires Huber to monitor secondary voltage on each field, primary current on each field and secondary current on each field of the ESP controlling emissions from Boiler #1 and the Dryer System. More detail about monitoring is provided in Section III of this license, Compliance Assurance Monitoring (CAM).

E. Press

Huber's Press compacts wood flakes, binders and wax, and OSB product. Release agents and catalysts may also be used in the press. The Press is equipped with an enclosure which meets the definition of wood products enclosure in 40 C.F.R. Part 63, Subpart DDDD (Plywood MACT) and emissions are vented to the Boiler #1 and/or Dryer Furnace for control. Emissions applicable to the Boiler #1 and Dryer System inherently address press vent emissions. Under the Plywood MACT, enclosures meeting the definition of a wood products enclosure are considered to capture 100% of the press emissions. Therefore, there are no separate applicable emission limits for the Press.

The exhaust from the press enclosure is routed to the boiler firebox and/or the dryer furnace firebox for combustion. The press enclosure has resulted in a reduction in fugitive VOC emissions. In addition, Huber reviewed methyl diisocyanate (MDI) emissions and determined that the 2008 project reduced MDI emissions to levels approaching the Department's insignificant activity threshold.

BPT for the Press

BPT for the Press is a press enclosure meeting the definition of a wood products enclosure under the PCWP MACT and routing of Press exhaust to the Dryer Furnace and/or Boiler #1. The Press does not have a separate emission point under the process design. The BPT emissions limitations and control technologies evaluated for Boiler #1 and the Dryer System incorporate the emissions from combustion of the Press exhaust.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The Press system is subject to 40 C.F.R. Part 63, Subpart DDDD, the NESHAP for Plywood and Composite Wood Products (PCWP MACT). Compliance for the Press has been established and demonstrated by press enclosure design and by routing the exhaust to the flame zones of the dryer and/or boiler furnaces.

The Press cannot operate without the boiler furnace producing steam to heat the platens. On occasion, green wood flakes are not available for processing in the dryer systems. However, the dryer furnace and dryer systems will continue to operate while "subloading" the dehydration drum(s) with water until wood flakes are again ready for processing.

F. Temporary Package Boiler

Huber is permitted to utilize a temporary #2 oil-fired portable package boiler for up to four weeks (28 days) per calendar year when the Boiler #1 is unavailable to produce steam at design pressure due to maintenance or repairs. The package boiler shall not

exceed 52.4 MMBtu/hr, which is the nominal oil-firing capacity of Boiler #1. Huber may burn only fuel which meets the criteria in ASTM D396 for #2 oil in the temporary package boiler. Oil used in the boiler will be included in determining compliance with the daily and 12-month rolling facility-wide oil use limits.

Periodic Monitoring

Huber must maintain records of the dates and times of operation of the temporary package boiler and, on a daily basis, the amount of oil used in the boiler.

G. Dry Fuel Bin Baghouse

The 2008 project included the installation of a new dry fuel bin baghouse on top of a new dry fuel bin. This equipment replaced the existing dry fuel bin and associated baghouse. The baghouse is designed to maintain PM and PM₁₀ emissions to less than 1.0 ton per year and Huber will use high-efficiency bags to limit emissions to this level.

H. Screener Baghouse

The 2008 project included the installation of a new Screener Baghouse. This equipment was installed to accommodate the new dryer screens and reduce the loading to the Forming Fines Baghouse. The Screener Baghouse vents inside the main process building. Periodic visual inspections for dust accumulation inside the building may be performed.

I. Emergency Generator #1

The emergency generator is only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. Emergency generator is not to be used for prime power when reliable offsite power is available. Based on the manufactured date and year of installation of the diesel generator, there are different federal requirements that may apply. Emergency Generator #1 is subject to 40 CFR Part 60 Subpart IIII *New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines*.

As part of Huber's 2008 project, Emergency Generator #1 was installed. The unit is rated at 250 Kilowatts (kw) and 399 horsepower (hp) with a maximum heat input capacity of 2.6 MMBtu/hr. This generator is subject to the New Source Performance Standards (NSPS) Subpart IIII.

NSPS Requirements

Huber's back-up generator is defined as any stationary internal combustion engine whose operation is limited to emergency situations and required testing and maintenance. Examples include stationary engines 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 engines used to pump water in the case of fire or flood. Stationary engines used to supply power to an electric grid or that supply power as part of a financial arrangement with another entity are not considered to be emergency engines.

Huber's Emergency Generator #1 was purchased after July 11, 2005 and manufactured after April 1, 2006. Therefore, Generator #1 is subject to New Source Performance Standards 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

A summary of the BPT analysis for Emergency Generator #1 (2.6 MMBtu/hr) is the following:

1. Emergency Generator #1 shall fire only diesel fuel with a maximum sulfur content not to exceed 15 ppm.
2. Emergency Generator #1 shall be limited to 100 hr/yr of operation for maintenance checks and readiness testing. Generator #1 shall be limited to 500 hours per year of total operation. Both of these limits are based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours.
3. Emergency Generator #1 shall be equipped with a non-resettable hour meter.
4. PM, CO, and NO_x + VOC emission limits are based on emission limits set forth in 40 CFR 60, Subpart IIII.
5. Huber shall operate and maintain Emergency Generator #1 in accordance with the manufacturer's written instructions. Huber shall not change settings that are not approved in writing by the manufacturer.
6. Visible emissions from Emergency Generator #1 shall not exceed 20% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period.

| Emission Unit | PM (lb/hr) | PM₁₀ (lb/hr) | SO₂ (lb/hr) | NO_x + VOC (lb/hr) | CO (lb/hr) |
|------------------------|-----------------------|------------------------------------|-----------------------------------|---|-----------------------|
| Emergency Generator #1 | 0.13 | 0.13 | 0.13 | 2.64 | 2.29 |

40 CFR Part 60, Subpart IIII

The federal regulation 40 CFR Part 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE)* is applicable to the emergency generator listed above since the unit was ordered after July 11, 2005 and manufactured after April 1, 2006. By meeting the requirements of Subpart IIII, the unit also meet the requirements found in the *National Emission Standards for*

Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ.

a. Emergency Definition:

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

- (1) The stationary ICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary ICE 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 ICE used to pump water in the case of fire or flood, etc.
- (2) Paragraph (1) above notwithstanding, the emergency stationary ICE 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 ICE 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 ICE 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 if the following conditions are met:

- (i) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
- (ii) 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.
- (iii) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
- (iv) The power is provided only to the facility itself or to support the local transmission and distribution system.
- (v) 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.

[40 CFR §60.4211(f) and §60.4219]

b. 40 CFR Part 60, Subpart III Requirements:

The generator shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in 40 CFR §60.4202. [40 CFR §60.4205(b)]

The diesel fuel fired in the generator shall not exceed 15 ppm sulfur (0.0015% sulfur), except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. [40 CFR §60.4207(b)]

A non-resettable hour meter shall be installed and operated on the generator. [40 CFR §60.4209(a)]

The generator shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by Huber that are approved by the engine manufacturer. Huber may only change those emission-related settings that are permitted by the manufacturer. [40 CFR §60.4211(a)]

The generator shall 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 §60.4211(f)(3)(i) are met). [40 CFR §60.4211(f)]

No initial notification is required for emergency engine. [40 CFR §60.4214(b)]

If Huber 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 §60.4211(f)(3)(i), the facility shall submit an annual report containing the information in §60.4214(d)(1)(i) through (vii). 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). 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 §60.4214(d)]

J. Emergency Fire Pump

Huber also owns an emergency fire pump which was installed prior to April 2006 and is therefore subject to 40 CFR Part 63 Subpart ZZZZ *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*.

A summary of the BPT analysis for the emergency fire pump (1.9 MMBtu/hr) is the following:

- PM/PM₁₀ – 0.31 lb/MMBtu from AP-42 Table 3.3-1 (dated 10/96)
- SO₂ – based on firing 0.05% sulfur,
- NO_x – 4.41 lb/MMBtu, AP-42, Table 3.3-1 (dated 10/96);
- CO – 0.95 lb/MMBtu, AP-42, Table 3.3-1 (dated 10/96);
- VOC – 0.36 lb/MMBtu, AP-42, Table 3.3-1 (dated 10/96);
- Opacity – Visible emissions from each of the diesel emergency generators shall 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.

| Unit | PM (lb/hr) | PM ₁₀ (lb/hr) | SO ₂ (lb/hr) | NO _x (lb/hr) | CO (lb/hr) | VOC (lb/hr) |
|---------------------------------------|---------------|-----------------------------|----------------------------|----------------------------|---------------|----------------|
| Emergency Fire Pump (1.9 MMBtu/hr) | 0.6 | 0.6 | 0.1 | 8.4 | 1.8 | 0.7 |

40 CFR Part 63, Subpart ZZZZ

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 the emergency fire pump listed above. The unit is considered existing, emergency stationary reciprocating internal combustion engine at an area HAP source and 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:

- (ii) 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.
- (iii) 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.

The emergency fire pump 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 this engine to not be considered emergency engine and therefore subject to all the requirements for non-emergency engines.

b. 40 CFR Part 63, Subpart ZZZZ Requirements:

| | Compliance Dates | Operating Limitations* (40 CFR §63.6603(a) and Table 2(d)) |
|---|---------------------------|---|
| Compression ignition (diesel, fuel oil) units: Emergency Fire Pump | 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.

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The generator shall be operated and maintained according to the manufacturer's emission-related written instructions or Huber 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)]

Huber 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, Huber 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)]

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

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]

The generator shall 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)]

Huber shall keep records that include maintenance conducted on the emergency fire pump and the hours of operation of the 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 generator is 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), Huber 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)]

If Huber 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), beginning January 1, 2015, the diesel fuel fired in the generator shall not exceed 15 ppm sulfur (0.0015%). Any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. [40 CFR §63.6604(b)]

If Huber 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). 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)]

K. Fuel Conveyor Systems

The 2008 project significantly changed the fuel conveyor system at the facility. The previous conveyor system used a number of open conveyors with the possibility of generating fugitive emissions. The 2008 project involved several new fuel conveyors. The conveyors are enclosed trough, drag chain conveyors to minimize fugitive emissions and have resulted in a significant reduction in fugitive PM and PM₁₀ emissions from the fuel handling systems.

BPT for this equipment is enclosed design and an opacity limit of 20% except for no more than one 6 minute block in any one hour period.

L. Blending and Forming Vent

The dried wood strands are fed into blending drums where binders and wax are applied to the strands prior to being formed into mats and pressed. A ventilation system maintains the blenders and formers under negative pressure to ensure adequate indoor air quality. The air removed by the system is filtered to remove particulate matter by the Forming Fines Baghouse which is addressed in the next section. A ventilation system for the three forming line bunkers is vented through a non-baghouse filter vent system prior to discharge. There are no additional applicable requirements for the Blending and Forming unit.

Potential PM and VOC emissions from the blender and forming line pickup points are included in the Forming Fines Baghouse potential emissions.

M. Dust Handling Systems

Huber operates the following dust handling and control systems that vent outside:

1. Forming Fines Baghouse,
2. Sawline Baghouse
3. Sanding Baghouse, and
4. Dry Fuel Bin and Baghouse.

The baghouses will be maintained to reduce particulate emissions from each baghouse to less than 1 tpy. In addition, the vent from the Blending and Forming Unit is routed through the Forming Fines Baghouse. VOC emissions from the Baghouses are expected to be minimal.

In order to minimize fugitive emissions, Huber will follow a written, Best Management Practices (BMP) plan for all plant dust handling and control systems. The BMP shall be available to the Department upon request. For the dust handling systems, Huber shall:

1. Maintain an alarm system and proper operating condition.
2. Maintain all baghouses to achieve visible emissions no greater than 10% opacity on a 6-minute average basis except for one 6-minute period per hour.
3. Take corrective action if opacity exceeds 5% from the baghouses.
4. Inspect the dust collection and control systems for leaks and malfunctions as described in Huber's BMP plan.
5. Install bags rated to maintain PM emissions at less than 1 ton per year.

BPT for the Dust Handling Systems

The most effective control technique for particulate matter from pneumatic transfer is baghouse control. Baghouse technology is considered as BPT for this application, with annual particulate emissions less than 1 tpy from each baghouse. BPT determinations for VOC from baghouses are "no control" or "good design and operation." There is no design method for baghouses that affects VOC emissions.

N. Fugitive Emissions

The 2008 project included a new fuel conveyor system, using enclosed conveyors. Installation of the new conveyor system resulted in reductions in fugitive particulate emissions from the facility. The project also included the installation of a wood products enclosure on the press which resulted in a decrease in particulate and fugitive VOC emissions from the manufacturing building. The facility will continue to have fugitive VOC emissions from insignificant emission units such as OSB storage, hot log ponds, log storage, chip/bark piles, chip handling, roads, and other miscellaneous manufacturing processes.

O. Ink Jet Printer

The ink jet printer system is used to apply logos and nail grids to the OSB products through printer heads in an enclosed booth after the facility's sanding operations. The inks utilized are solvent-based with an average VOC content of the inks historically used in the Ink Jet Printer approximately 7 pounds of VOC per gallon. Huber is limited by license condition to 20.7 tons per year of VOC emissions from the ink jet printer. The average VOC content in this paragraph is not a limit. Huber may utilize different types and amounts of inks provided it limits annual VOC emissions from the ink jet printer to 20.7 tpy. Huber has been researching the use of lower VOC containing inks and those may be used in the future.

BPT for the Ink Jet Printer

VOC control technologies considered:

- (i) Biofiltration – To ensure the health of microorganisms in the biofilter, a constant feed stream of VOCs must be maintained. Inking operations at Huber's Easton facility are sufficiently intermittent to not support a biofilter. Therefore, a biofilter is technically infeasible for the Ink Jet Printer.
- (ii) Low VOC Ink – Although used in various industrial coatings operations, the use of currently available low VOC inks needed for the specific application in the Huber operation have not yet proven to be feasible. To meet Huber's needs, inks must meet specific criteria relating to, for example, clarity, drying time, adhesion, and bleeding. To date, low VOC inks have not met Huber's criteria. Huber will continue to evaluate the potential to use low VOC inks as new products become available.

BPT for VOCs from the Ink Jet Printer is good housekeeping practices and a limit of 20.7 tons per year. Huber will also be required to review the availability of new, low VOC containing inks as new products become available and, on an annual basis, provide a summary to the Department of any such reviews.

Periodic Monitoring

Periodic monitoring for the ink jet printer consists of maintaining records of the VOC content of inks utilized, the amount of inks used and the amount of VOCs in the inks on a monthly basis and 12-month rolling total basis.

P. Edge Spraying

Huber conducts several different types of edge spraying activities in an enclosed booth for its OSB. Through Air Emissions License, A-62-77-4-M issued April 5, 2010, BPT for this process will be to maintain filters to reduce particulates and limit VOC emissions to 6.5 tons per year based on a 12-month rolling total and 1,666 pounds or less in any calendar month from the edge sealing process.

Q. Gasoline Tank

Huber operates a 550-gallon gasoline tank which provides gasoline for Huber's vehicles. The tank is equipped with a submerged fill pipe that extends to within 6 inches of the bottom of the tank.

Periodic monitoring

Huber shall maintain records of the amount of gasoline throughput of the tank on a monthly basis.

R. Parts Washers

For parts washers using solvent containing more than 5% VOCs by weight, Huber shall label any parts washers with operational standards, equip the washers with covers if the vapor pressure is >15 mmHG at 100°F, close covers when not in use, drain parts for 15 seconds or longer, keep drafts < 40 m/minute, repair leaks, and keep records of solvent added and removed. Huber shall not degrease any non-metal porous material and will meet the applicable requirements of 06-096 CMR 130 (as amended) as described in Condition (25) of this license.

S. Facility Emissions

**Total Licensed Annual Emissions for the Facility
 (Tons/year)**

(used to calculate the annual license fee)

| Emission Units | Potential Emissions (tons/year) | | | | | | |
|--|------------------------------------|------------------|-----------------|-------|-----------------|-------|---------|
| | PM | PM ₁₀ | NO _x | CO | SO ₂ | VOC | Lead |
| ESP Stack (includes Press, Furnace, Dryers #3 & #4, Boiler #1) | 96.3 | 96.3 | 317.3 | 488.7 | 38.3 | 95.5 | 7.2E-03 |
| Dry Fuel Bin Baghouse (new) | 1.0 | 1.0 | -- | -- | -- | 3.3 | -- |
| Ink Jet Printing | -- | -- | -- | -- | -- | 20.7 | -- |
| Edge Spraying | -- | -- | -- | -- | -- | 6.5 | -- |
| Blending Forming Vents | (Proposed for removal in Phase II) | | | | | | |
| Forming Fines Baghouse | 1.0 | 1.0 | -- | -- | -- | 5.5 | -- |
| Sawline Baghouse | 1.0 | 1.0 | -- | -- | -- | 2.5 | -- |
| Sander Baghouse | 1.0 | 1.0 | -- | -- | -- | 7.1 | -- |
| Emergency Generator | 0.2 | 0.2 | 2.9 | 0.6 | 0.1 | 0.3 | -- |
| TOTAL | 100.5 | 100.5 | 320.2 | 489.3 | 38.4 | 141.4 | 7.2E-03 |

III. Compliance Assurance Monitoring (CAM)

The following constitutes Huber's Compliance Assurance Monitoring (CAM) Plan for the facility's renewal of its Part 70 Air Emission License.

Introduction

Subject to certain exemptions, the CAM requirements of 40 C.F.R. Part 64 (incorporated into 06-096 CMR 140 (as amended) of the DEP regulations) applies to units that: (i) are subject to a federally enforceable emission limitation for an applicable regulated pollutant (except for, inter alia, emissions standards proposed by EPA after 1990 pursuant to Sections 111 or 112 of the Clean Air Act), (ii) use an active control device to achieve compliance with the limit, and (iii) have potential pre-control device emissions of the applicable regulated pollutant that are equal to or greater than 100% of the amount in tons per year required for a source to be classified as a major source. The emission units at Huber that meet these three criteria are as follows:

1. Boiler #1 for particulate matter (PM);
2. Dryers No. 3 and No. 4 and the Dryer Furnace (together referred to as the Dryer System) for PM; and
3. Four dust collection system and associated baghouses as follows: Sander Baghouse, Trim and Grade baghouse, Forming Fines Baghouse and Dry Fuel Bin Baghouse.

Boiler #1 and the Dryer System

The PM emissions streams from Boiler #1 and the Dryer System will be combined and controlled by a mechanical dust collector and dry electrostatic precipitator (ESP) and the combined emissions will exhaust through a common stack. Given that these units' PM emissions are controlled by a shared control device, a single CAM plan for the mechanical dust collector and dry ESP serving these emissions units is allowed.

A. Control Technology

1. Mechanical dust collector and dry ESP.
2. Pollutant controlled: PM

B. Emission Limits: DEP established the following BACT limits for PM under the new source review provisions of 06-096 CMR 115: 0.07 lbs/MMBtu (Boiler #1) and 22.0 lbs/hr for combined emissions from Boiler #1 and the Dryer System per License Condition (19)(A) of Huber's NSR Air License # A-62-77-2-A.

C. Indicator Monitored: Opacity and, for the ESP, secondary voltage, primary current and secondary current. Note that NSR Air License #A-62-77-2-A requires operation of a continuous opacity monitor system (COMS). The license also requires Huber to monitor and record secondary voltage, primary current and secondary current on each field of the dry ESP once every 12-hour shift during operation.

D. Analytical Devices Required: A COMS and, for the ESP, meters for secondary voltage, primary current and secondary current.

E. Indicator Range: A license violation occurs when a 6-minute average opacity measurement is greater than 20%, except for one 6-minute average in an hour not to exceed 27%. Huber will continuously monitor the opacity from the boiler when producing at a rate greater than 8,000 lbs of steam per hour and will use an indicator set point of 16% opacity at which level an inspection of the particulate control parameters will be initiated which provides reasonable assurance of compliance with PM emission limits contained in Huber's air license. Specifically, when an opacity reading of 16% for ten consecutive six-minute block average periods is reached, excluding periods of startup, shutdown, or malfunction, Huber will immediately check the following parameters:

- ESP secondary voltage on each field, primary and secondary current on each field, spark rate indicators, inlet and outlet gas temperatures, and ESP alarms.

F. Data Requirements and Recordkeeping: Records of COMS data shall be maintained in accordance with 06-096 CMR 117 (as amended) of the DEP regulations and 40

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C.F.R. Part 60, Subpart A. Huber will record secondary voltage, primary and secondary current values once every 12 hours for each field.

G. Specific QA/QC Procedures: Calibrate, maintain and operate the COMS in accordance with 06-096 CMR 117 (as amended) of the DEP regulations and 40 C.F.R. Part 60, Subpart A. Calibrate, maintain and operate the secondary voltage, primary and secondary current meters using procedures that take into account the manufacturer's specifications.

H. Rationale for Monitoring Approach: Boiler #1 is subject to 40 C.F.R. Part 63, Subpart DDDDD, the NESHAP for Industrial, Commercial and Institutional Boilers and Process Heaters ("Boiler MACT") published in the federal register on February 21, 2011. EPA revised the rule and published these revisions on January 13, 2013 in the Federal Register. Existing sources must be in compliance within three (3) years from the date of publication of the final rule in the Federal Register (approximately early 2016). In accordance with 06-096 CMR 140, Section 6, Huber will submit an application under the Part 70 Administrative Revision procedures of 06-096 CMR 140 to incorporate into this license the provisions of Subpart DDDDD.

In the meantime, Huber proposes that operation of a continuous opacity monitor and monitoring of secondary voltage, primary current, and secondary current on each field of the ESP once per 12 hour shift fulfill CAM requirements for the Boiler and ESP. Subpart DDDDD and 40 CFR Part 60, Subpart Dc reflects EPA's determination that a COMS is an appropriate monitoring tool for ESP performance. In addition, DEP imposed the requirement in Huber's NSR Air License to monitor secondary voltage, primary current and secondary current on each field once per 12-hour shift. Secondary voltage, primary current, and secondary current have been identified by the U.S. EPA as a presumptively acceptable monitoring approach for ESPs.

Secondary voltage, primary current, or secondary current values outside of the ESP manufacturer's recommended ranges are not violations provided Huber promptly reviews operation of the ESP and, if it finds the ESP is not operating normally, makes adjustments to return the ESP to normal operation.

The CAM requirements in this license for PM emissions from the Boiler and ESP shall be superseded by the applicable monitoring and recordkeeping requirements for PM in the Boiler MACT rule once that rule is finalized (after reconsideration) by EPA beginning on the relevant compliance date for Huber.

Baghouses

Huber operates processes that have the potential to emit PM and create visible emissions. Certain processes are controlled by baghouses, have potential, uncontrolled emissions in excess of 100 tons/yr, and are subject to federally enforceable emission limitations and, therefore, are subject to the Compliance Assurance Monitoring requirements. These units are: Sander System controlled by the Sander Baghouse, Trim and Edge system controlled by the Sawline Baghouse, Forming and Blending System controlled by the Forming Fines Baghouse. Dry Fuel System controlled by the Dry Fuel Bin Baghouse.

- A. Control Technology: Each of the dust handling and control systems listed above is equipped with a baghouse.
- B. Emission Limit: Each of the dust handling and control systems listed above is subject to the general process weight rate PM limitation as set forth in 06-096 CMR 105 of the DEP regulations which establishes emission rates based on process weight rate. Whereas Huber has accepted lower operating limits of 1 ton/yr PM from each baghouse, it is unnecessary to perform the weight rate calculations in 06-096 CMR 105. In addition, each of the dust handling and control systems are subject to an opacity limit of 10% on a 6-minute average basis except for one 6-minute period per hour of visible emissions per Condition 24 of Huber's NSR Air License #A-62-77-2-A.
- C. Indicator Monitored: Each of the baghouses will be equipped with a bag leak detection system that will alarm if leaks are detected. The alarms will operate continuously. If an alarm triggers, Huber will investigate and take corrective action as necessary. However, alarms do not constitute violations.
- D. Analytical Devices Required: Bag leak detector and associated instrumentation.
- E. Rationale for Monitoring Approach: Bag leak detectors that operate on principles such as electrostatic induction, light scattering or light transmission, produce a signal that is proportional to the particulate loading in the baghouse outlet gas stream. Bag leak detection monitors have been identified by the U.S. EPA as an acceptable CAM approach for units controlled by baghouses.
- F. Data Requirements and Recordkeeping: Huber will maintain records of the date and time of any alarms, the results of its investigations of the cause of the alarm and the corrective actions taken, if any.
- G. Specific QA/QC Procedures: Calibrate, maintain and operate instrumentation using procedures that take into account manufacturer's specifications.

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IV. Ambient Air Quality Analysis

Huber 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. A refined modeling analysis was performed to demonstrate that emissions from Huber will not cause or contribute to violations of Maine Ambient Air Quality Standards (MAAQS) for SO₂, PM₁₀, NO₂ or CO or to Class II increment standards for SO₂, PM₁₀ or NO₂. The modeling analysis can be found in Air Emissions License, A-62-77-2-A, issued June 13, 2007. An additional ambient air quality analysis is not required for this Part 70 License Renewal.

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
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-62-70-F-R/A pursuant to 06-096 CMR 140 (as amended) and the preconstruction permitting requirements of 06-096 CMR 115 (as amended) and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Huber 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 MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supersede 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 (as amended) for making such changes and pursuant to the applicable requirements in 06-096 CMR 140 (as amended).

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

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

STANDARD STATEMENTS

- (1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both; [06-096 CMR 140]
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [06-096 CMR 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 CMR 140]
- (4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license; [06-096 CMR 140]
- (5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 140]
- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
 - A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

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

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee.

| SOURCE | CITATION | DESCRIPTION | BASIS FOR DETERMINATION |
|---------------------------------------|---------------------------------|---|---|
| Dryers #3 and #4 | 40 C.F.R. Part 60 Subpart Dc | Standards of performance to new stationary sources | Dryers #3 and #4 are not "steam generating units." |
| Facility | 40 C.F.R. Part 63 Subpart U | National emission standards for hazardous air pollutant emissions: Group I polymers and resins | Huber does not produce Group I polymers or resins. |
| Facility | 40 C.F.R. Part 63 Subpart W | National emission standards for hazardous air pollutant emissions for epoxy resins production and non-nylon polyamides production | Huber does not produce epoxy resins or non-nylon polyamides |
| Facility | 40 C.F.R. Part 63 Subpart JJ | National emission standards for wood furniture manufacturing operations | Huber does not produce wood furniture |
| Facility | 40 C.F.R. Part 63, Subpart QQQQ | National emission standards for surface coating of wood building products | Huber does not surface coat wood building products as regulated under Subpart QQQQ, section 63.4681. Huber meets the exemption criteria of paragraphs (c)(1)(i) through (c)(1)(xi) of this section. |
| Dryers #3 and #4 and OSB press | Chapter 134 | VOC RACT | As per Section 1(C)(2), of Chapter 134, dryers and press vent are not subject to VOC RACT because they were subject to BACT |
| Wood yard operations | Chapter 134 | VOC RACT | As per Section 1(C)(6), emissions from wood yards are not subject to VOC RACT |
| Ink Jet Printer and Edge Seal Coating | Chapter 129 | Surface coating facilities | Huber's OSB is not considered "flat wood paneling" for purposes of Chapter 129 |

| | | | |
|----------------------------|-------------|--|--|
| Edge Seal Coating | Chapter 159 | Control of VOCs from Adhesives and Sealants | OSB edge sealants are not formulated primarily to fill, seal, waterproof or weather proof gaps or joints between two surfaces |
| Emergency Fire Pump Engine | Chapter 140 | <ul style="list-style-type: none"> • Insignificant Activity for SICE • For Chapter 140 sources, reduction of the insignificant activity category for stationary internal combustion engines from 3.0 MMBtu/hr to 1.7 MMBtu/hr. • The Huber Emergency Fire Pump Engine is rated at 1.9 MMBtu/hr. | The Maine DEP adopted amendments to its air licensing regulations, including Chapter 100, Definitions; Chapter 115, Major and Minor Source Air Emission License Regulations; and Chapter 140, Part 70 Air Emission License Regulations. The amendments became effective December 1, 2012. The amendments included a number of changes that should be considered by facilities filing applications for minor or major NSR licenses under Chapter 115 or applications for renewal or amendment of Chapter 140/Title V air licenses. Whereas the Huber renewal application was submitted in January 2008, the emergency fire engine is not required to be included in this license. |

[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

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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]

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- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to 38 M.R.S.A. §353.
- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; [06-096 CMR 140]
Enforceable by State-only
- (6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;
[06-096 CMR 140]
- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [06-096 CMR 140]
- (8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- A. perform stack testing under circumstances representative of the facility's normal process and operating conditions:
1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
 2. to demonstrate compliance with the applicable emission standards; or
 3. pursuant to any other requirement of this license to perform stack testing.
- B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

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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) **Boiler #1**

[06-096 CMR 115, New Source Review Amendment A-62-77-2-A, BACT issued 6/13/07]

Huber may fire in Boiler #1: bark, wood and OSB process waste, including hogged trim, sander dust, wood fines, paper, cardboard, ZIP paper, wood pallets, used oil/grease, vehicle wash water, binders, wax, release agent, stamp ink, edge seals and other non-hazardous OSB process wastes, and boiler blowdown water. Huber may also fire oil which meets the criteria in ASTM D396 for #2 oil. Propane, kerosene or rags soaked with kerosene or oil may be fired for startup purposes. [06-096 CMR 115, BPT]

- A. Huber shall maintain and operate an electrostatic precipitator (ESP) to control particulate matter (PM, PM₁₀) emissions from Boiler #1 and the Dryer System. [06-096 CMR 115, BPT]
- B. Emissions from Boiler #1 shall not exceed the following lb/MMBtu limits and the lb/hr limits in Condition (16) of this license, except for periods of startup, shutdown, or malfunction:

| Pollutant | Emission Rate lb/MMBtu | Origin and Authority |
|-----------|---------------------------|---|
| PM | 0.07 | 06-096 CMR 115, BPT |
| NOx | 0.40 | 06-096 CMR 138 NOx RACT, 06-096 CMR 115, BPT |

- C. For Boiler #1, Huber shall not exceed 8,400 gallons per day or 350,000 gallons per year (on a 12-month rolling total) of #2 oil which meets the criteria of ATSM D396 for #2 fuel oil. [06-096 CMR 115, BPT.] Beginning January 1, 2016 Huber shall use #2 oil that contains 0.005% or less sulfur by weight; and beginning January 1, 2018, Huber shall use #2 oil that contains 0.0015% or less sulfur by weight. [38 MRSA 603-A, **State-only enforceable.**]
- D. Compliance with the fuel oil limits shall be based on records of fuel use and fuel oil supplier receipts identifying that the #2 oil meets the criteria in ASTM D396 for #2 fuel oil. If Huber exceeds 8,400 gallons per day or 350,000 gallons per year, then the fuel receipts must also identify the sulfur content of the oil to demonstrate the sulfur equivalency is more restrictive than the criteria in ASTM D396 for #2 oil. Huber shall maintain a record of fuel oil used in Boiler #1 on a daily basis and 12-month rolling total basis and shall maintain records of fuel oil supplier receipts. [06-096 CMR 115, BPT]

- E. Huber shall maintain records of steam production from Boiler #1 and calculations of wood fuel used in the boiler based on steam production on a monthly basis. [06-096 CMR 115, BPT]
- F. Particulate matter (PM, PM₁₀) emissions from Boiler #1 shall be controlled by the operation and maintenance of the ESP, except for periods of startup, shutdown, and malfunction. [40 CFR Part 60 Subpart A, Dc & 38 MRSA 349 (9)]
- G. Huber shall develop and submit a startup/shutdown/malfunction (SSM) plan for approval by the Department for Boiler #1 within 180 days after issuance of this air emissions license renewal.
- H. Compliance with the PM emission limits in paragraph C of this Condition (14) shall be demonstrated through stack testing with only Boiler #1 emitting to the DESP and in accordance with 40 C.F.R. Part 60, App. A, Method 5 upon request by the Department. Huber may operate the boiler on oil with the DESP de-energized only if the facility performs a compliance test demonstrating that the boiler can meet all applicable emission limits. [06-096 CMR 115, BPT]
- I. Compliance with the NO_x emission limits in paragraph C of this Condition (14) shall be demonstrated through stack testing of only Boiler #1 emissions in accordance with 40 C.F.R. Part 60, App. A, Method 7E upon request by the Department. [06-096 CMR 115, BPT]
- J. New Source Performance Standards [40 CFR Part 60 Subpart A & Dc]
- (i) Boiler #1 is subject to 40 C.F.R. Part 60, Subparts A and Dc. Huber shall provide notifications, maintain records, and submit reports as required by the subparts or approved alternatives.
 - (ii) Huber shall maintain records of the amount of wood fuel and oil combusted each day to allow calculation of annual capacity factor for each calendar quarter.
 - (iii) Visible emissions from Boiler #1 shall not exceed 20% opacity on a 6-minute average except for one 6-minute period per hour of not more than 27% opacity. This opacity standard shall apply at all times, except during periods of startup, shutdown, and malfunctions as defined in Condition (14)(G).
 - (iv) Compliance with the opacity limit for Boiler #1 and the Dryer System shall be demonstrated by means of a single continuous opacity monitoring system (COM) located after the ESP. The COMs shall be operated, certified, and maintained in accordance with 40 C.F.R. Part 60, Subparts A and Dc.
- K. Huber shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for*

Industrial, Commercial and Institutional Boilers and Process Heaters, when required.

(15) **Dryer System**

[06-096 CMR 115, New Source Review Amendment A-62-77-2-A, BACT issued 6/13/07]

- A. Huber is licensed to operate two low temperature wood flake dryers (each 21.25 oven dry tons/hr) and an associated dryer furnace with a nominal heat input rating of 152 MMBtu/hr (50% moisture equivalent) (together referred to as the “Dryer System”). Huber is licensed to fire bark, wood and OSB process waste, including hogged trim, sander dust, wood files, paper, cardboard, wood pallets, used oil/grease, vehicle wash water, binders, wax, release agent, stamp ink, edge seals and other non-hazardous OSB process wastes, boiler blowdown water and #2 fuel oil. Propane, kerosene or rags soaked with kerosene or oil may be fired for startup purposes. [06-096 CMR 115, BPT]
- B. The maximum firing rate of fuel in the furnace shall not exceed on a monthly average an amount of fuel with the heat input equivalent of 420 tons/day of 4,350 Btu/lb, 50% moisture fuel. Compliance shall be demonstrated by monitoring and recording the fuel feed to the unit. [06-096 CMR 115, BPT]
- C. Except as provided in Condition (15) D, particulate matter (PM, PM₁₀) emissions from the Dryer System shall be controlled by the operation and maintenance of an ESP. The ESP shall also control particulate matter emissions from Boiler #1. [06-096 CMR 115, BPT]
- D. The Dryer Furnace is equipped with a by-pass vent that may be used in the event of an equipment malfunction, including over or under-pressure situations. The vent may also be used when maintenance is performed on the dryers or the furnace is in start up or idle condition. Huber shall maintain records of the date, time, duration and cause for use of the vent. The Dryer System also includes an emergency vent located between the primary cyclones and the dry ESP. This abort vent is at the dryer Mechanical Separator and is automatically opened to prevent an ESP fire/explosion in the event that the air stream oxygen content entering the ESP approaches the flammable threshold.

Use of the furnace by-pass vent for pressure relief situations and use of the Mechanical Separator is limited to 100 hours per year. Use of the vents beyond these limits may be exempt if due to unavoidable malfunction. Use of the furnace by-pass vent during furnace idle conditions is limited to 288 hours per year. The vents may also be used during the 180 day initial startup and shakedown period for Phase II of the project. These limits do not apply to those periods when the

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dryer system starting up or is shutting down. The Mechanical Separator openings may not be counted toward the limit when flake drying is not occurring and the furnace is not venting to it.

[06-096 CMR, BPT]

- E. Emissions from the Dryer System shall not exceed the following lb/hr limit and the lb/hr limits in Condition (16) of this license, except for periods of startup, shutdown, or malfunction:

| Pollutant | Emission Rate (lb/hr) | Origin and Authority |
|-----------|-----------------------|----------------------|
| NOx | 38.8 | 06-096 CMR 115, BPT |

- F. Compliance with the NOx lb/hr limit shall be demonstrated by stack testing the ESP Stack Combined NOx emissions in accordance with Condition (16) and subtracting the lb/hr NOx emissions from Boiler #1. NOx testing for the Dryer System shall be required upon request by the Department. [06-096 CMR 115, BPT]
- G. Huber shall develop and submit a startup/shutdown/malfunction (SSM) plan for approval by the Department for the Dryer System within 180 days after issuance of this air emissions license renewal.

(16) **ESP Stack Combined emissions from Boiler #1 and Dryer System**
[06-096 CMR 115, New Source Review Amendment A-62-77-2-A, BACT issued 6/13/07]

- A. Emissions from the ESP Stack shall not exceed the following:

| Pollutant | lb/hr | Origin and Authority |
|------------------------------------|-------|----------------------|
| PM | 22.0 | 06-096 CMR 115, BPT |
| PM ₁₀ | 22.0 | 06-096 CMR 115, BPT |
| SO ₂ (firing wood only) | 5.9 | 06-096 CMR 115, BPT |
| NOx | 72.4 | 06-096 CMR 115, BPT |
| CO | 111.6 | 06-096 CMR 115, BPT |
| VOC | 21.8 | 06-096 CMR 115, BPT |

[06-096 CMR 115, BPT]

- B. Compliance with the PM, PM₁₀, NOx, CO and VOC limits in paragraph A of this Condition (16) shall be demonstrated through stack testing in accordance with the following methods upon request by the Department. Compliance with the SO₂ limit in paragraph A of Condition (16) shall be demonstrated through stack testing upon Department request in accordance with the following method.

| Pollutant | Compliance Method |
|------------------|---|
| PM | 40 C.F.R. Part 60, Appendix A, Method 5 |
| PM ₁₀ | 40 C.F.R. Part 60, Appendix A, Method 5 or Method 201/201A 40 C.F.R. Part 51, Appendix M |
| NO _x | 40 C.F.R. Part 60, Appendix A, Method 7E |
| SO ₂ | 40 C.F.R. Part 60, Appendix A, Method 6C |
| VOC | 40 C.F.R. Part 60, Appendix A, Method 25 or 25A |
| CO | 40 C.F.R. Part 60, Appendix A, Method 10 |

C. Huber shall operate, at a minimum, the number of ESP chambers and number of fields per chamber that operated during the most recent demonstration of compliance with the licensed particulate emission limits. Data for the following points in the ESP shall be recorded once every twelve hours (once 7:00 a.m. to 7:00 p.m. and once 7:00 p.m. to 7:00 a.m.), except during periods of monitor malfunction per shift during operation:

- 1) Secondary voltages on each field
- 2) Primary current on each field
- 3) Secondary current on each field

Upon written notification to the Department, and in accordance with the Bureau of Air Quality’s Air Emission Compliance Test Protocol, Huber may perform additional particulate emission testing to demonstrate compliance with alternative operating scenarios, but under no circumstances shall Huber be relieved of its obligation to meet its licensed emission limits. [06-096 CMR 115, BPT]

- D. Huber shall develop a monitoring program that minimizes NO_x, CO, and VOC emissions and be made available upon Department request. [06-096 CMR 115, BPT]
- E. The exhaust stack from the ESP shall have a minimum stack height of 170 feet above ground level. [06-096 CMR 115, BPT]
- F. The dryer system shall not exceed the following Subpart DDDD MACT PBCO emission limitation in pounds per oven dried ton (lb/ODT) of material processed through the dryer systems.

| Pollutant | Emission Rate (lb/ODT) | Origin and Authority |
|-----------|------------------------|-----------------------------|
| Total HAP | 0.18 | 40 CFR Part 63 Subpart DDDD |

G. Inlet Dryer temperature shall be the controlling operating parameter to demonstrate continuous compliance with the limitations set forth in Condition

16(F). The temperature limit (maximum, range, average as appropriate) was established during initial performance testing in accordance with applicable requirements.

- H. Based on data collected during the initial performance test the site shall operate the dryers such that the maximum inlet temperature reading of any one of three dryer inlet thermocouples, calculated as a 5-minute rolling average shall not exceed 785 and 809 degrees Fahrenheit (F) for core and surface dryers respectively.
- I. The site may establish different controlling parameter limits for the dryer systems by submitting the notification specified in §63.2280(g) and conducting a repeat performance test as specified in paragraph 63.2262 (n)(1) that demonstrates compliance with the PBCO.
- J. Huber may apply to amend the requirements in Conditions (16)(F)-(J) to reflect amended or updated requirements of 40 CFR Part 63, Subpart DDDDD. Such a license amendment may be processed as a Part Administrative Revision under 06-096 CMR 140 and, by itself, shall not constitute a modification of the boiler for purposes of 06-096 CMR 100 and 115.

(17) **Press Vent**

[06-096 CMR 115, New Source Review Amendment A-62-77-2-A, BACT issued 6/13/07]

The press shall be equipped with an enclosure meeting the definition of a “wood products enclosure” at 40 C.F.R. Part 63, Subpart DDDD. Emissions from the press enclosure shall be routed to the combustion chamber of Boiler #1 and/or the dryer furnace. The “wood products enclosure” is designed to operate so the average facial velocity of air is at least 3600 meters per hour (200 feet per minute) through the three permanent natural draft openings (NDOs). The NDOs submitted for the MACT compliance demonstration for the press are the loader infeed, loader arm, and unloader outfeed. All non NDOs, i.e. doors, will remain closed during normal pressing operations. [06-096 CMR 115, BPT] The doors may be opened for minimal periods during normal operations for cleaning, inspection, and repair. Routine entry and exit through press enclosure doors shall be allowed but shall not exceed five minutes per use of each door.

(18) **Alternative Raw Materials**

[06-096 CMR 115, New Source Review Amendment A-62-77-2-A, BACT issued 6/13/07]

Huber wood supply is maintained by purchasing a mix of hardwood species, loads may contain an occasional random non-hardwood log. Huber may use alternative wood species and make changes to other raw materials such as glues, waxes, resins, release agents or other substances in the process upon notification to the Department. Huber may run trials with such new materials for a period up to 90 days. Huber shall provide notice to the DEP no later than 2 weeks after permanently switching to use of new materials. Upon request of the Department, Huber may be required to conduct stack tests to

demonstrate compliance with this license after making the permanent switch to a new substance.

[06-096 CMR 115, BPT]

(19) **Production Rates**

Huber shall notify the Department in writing within 30 days of first exceeding 525 tons/day production, 550 tons/day production, 575 tons/day production, etc., on a 14-day rolling average daily production rate basis. Huber shall maintain records documenting daily production rates and calculate the ongoing 14-day rolling average daily production rates. Huber shall stack test for NOx, PM, and VOC from the dryers and stack test for PM and VOC from the press vent to demonstrate compliance with applicable emission limits upon Department request. In determining whether to require Huber to conduct such testing, the Department shall consider the production levels during prior emission tests conducted by Huber and the frequency at which the increased production levels are achieved by Huber.

Huber shall maintain records documenting daily production rates, 14-day rolling average daily production rates and 12-month average daily production rates updated monthly.

[06-096 CMR 140, BPT]

(20) **Temporary Package Boiler**

Huber is permitted to utilize a temporary #2 oil-fired portable package boiler for up to four weeks (28 days) per calendar year when the Boiler #1 is unavailable to produce steam at design pressure due to maintenance or repairs. The package boiler shall not exceed 52.4 MMBtu/hr, which is the nominal oil-firing capacity of Boiler #1. Huber may burn only fuel which meets the criteria in ASTM D396 for #2 oil in the temporary package boiler. Oil used in the boiler will be included in determining compliance with the daily and 12-month rolling facility-wide oil use limits. Huber must maintain records of the dates and times of operation of the temporary package boiler and, on a daily basis, the amount of oil used in the boiler. The package boiler shall meet all applicable requirements, including any applicable requirements of 40 C.F.R. Parts 60 and 63.

[06-096 CMR 140, BPT, Air License A-62-70-A-I issued 7/31/03]

(21) **Ink Jet Printer**

[06-096 CMR 115, New Source Review Amendment A-62-77-2-A, BACT issued 6/13/07]

Huber shall maintain monthly records of the amounts and VOC content of inks used in the ink jet printer and records of maintenance and tune-ups/repairs. Huber may use alternative inks. The total VOC emissions from all inks applied by the Ink Jet Printer shall not exceed 20.7 tons per year on a 12-month rolling total from this process.

[06-096 CMR 115, BPT]

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(22) **Edge Spraying**

[06-096 CMR 115, New Source Review Amendment A-62-77-4-A, BACT issued 4/5/10]

Huber shall limit VOC emissions from the edge spraying process to 6.5 tons per year, based on a 12 month rolling total and shall limit VOC emissions to 1,666 pounds or less in any calendar month. Huber shall maintain documentation from the suppliers to demonstrate compliance with the VOC emission limit and usage. [06-096 CMR 115, BPT]

(23) **Dust Handling Systems**

[06-096 CMR 115, New Source Review Amendment A-62-77-2-A, BACT issued 6/13/07]

Huber shall operate the following dust handling and control systems:

- Forming Fines baghouse (including blending and forming vent),
- Sawline baghouse,
- Sanding baghouse, and
- Dry Fuel Bin baghouse.

In order to minimize fugitive emissions, Huber will follow a written, Best Management Practices (BMP) plan for all plant dust handling and control systems. The BMP shall be available to the Department upon request. For the dust handling systems listed above, Huber shall:

1. Maintain an alarm system and proper operating condition. During times when a baghouse alarm system is not operational, a daily physical inspection should be performed of the baghouse to reasonably confirm proper operation. This inspection would not be required on startup or shutdown days.
2. Maintain all baghouses to achieve visible emissions no greater than 10% opacity on a 6-minute average basis except for one 6-minute period per hour.
3. Take corrective action if opacity exceeds 5% from the baghouses.
4. Inspect the dust collection and control systems for leaks and malfunctions as described in Huber's BMP plan.
5. Use bags rated to maintain PM emissions at less than one ton/yr.

To demonstrate compliance with this condition, Huber shall have at least one employee certified in EPA Method 9 for visible emissions.

[06-096 CMR 101 & 06-096 CMR 115, BPT]

(24) **Fugitive PM Emissions**

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

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hour. To demonstrate compliance with this condition, Huber shall have at least one employee certified in EPA Method 9 for visible emissions.
[06-096 CMR 101]

(25) **Fuel Conveyor Systems**

- A. The outside fuel conveyor systems shall be covered.
[06-096 CMR 115, BPT, 06-096 CMR 115, New Source Review Amendment A-62-77-2-A, BACT issued 6/13/07]
- B. Visible emissions shall not exceed an opacity of 20 percent on a six (6) minute block average basis for more than one (1) six (6) minute block averages in a one hour period. To demonstrate compliance with this condition, Huber shall have at least one employee certified in EPA Method 9 for visible emissions. [06-096 CMR 101, Section 2(B)(3)(d) and 06-096 CMR 115, BPT]
To demonstrate compliance with this condition, Huber shall have at least one employee certified in EPA Method 9 for visible emissions.

(26) **Diesel-Fired Emergency Generator**

[06-096 CMR 115, New Source Review Amendment A-62-77-4-A, BACT issued 4/5/10]

- A. Generator #1 shall fire only diesel fuel with a maximum sulfur content not to exceed 15 ppm. [40 CFR 60.4207(b)]
- B. Generator #1 shall be limited to 100 hr/yr of operation for maintenance checks and readiness testing. Generator #1 shall be limited to 500 hours per year of total operation. Both of these limits are based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours. [40 CFR 60.4211(E) and 06-096 CMR 115, BPT]
- C. Generator #1 shall be equipped with a non-resettable hour meter.
[40 CFR 60.4209(a)]
- D. Emissions shall not exceed the following:

| Emission Unit | Pollutant | lb/MMBtu | Origin and Authority |
|---------------|-----------|----------|----------------------|
| Generator #1 | PM | 0.10 | 06-096 CMR 115, BPT |

E. Emissions shall not exceed the following [40 CFR 60.4205(b)]:

| Emission Unit | PM (g/hp-hr) | NO _x + VOC (g/hp-hr) | CO (g/hp-hr) |
|---------------|-----------------|------------------------------------|-----------------|
| Generator #1 | 0.15 | 3.0 | 2.6 |

F. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

| Emission Unit | PM (lb/hr) | PM ₁₀ (lb/hr) | SO ₂ (lb/hr) | NO _x + VOC (lb/hr) | CO (lb/hr) |
|---------------|---------------|-----------------------------|----------------------------|----------------------------------|---------------|
| Generator #1 | 0.13 | 0.13 | 0.13 | 2.64 | 2.29 |

G. Huber shall operate and maintain Generator #1 in accordance with the manufacturer's written instructions. Huber shall not change settings that are not approved in writing by the manufacturer. [40 CFR 60.4211(a)]

H. Visible emissions from the back-up generator shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block averages in a continuous 3-hour period. [06-096 CMR 101] To demonstrate compliance with this condition, Huber shall have at least one employee certified in EPA Method 9 for visible emissions.

I. The Emergency Generator shall demonstrate compliance by meeting the applicable requirements of 40 CFR Part 60, Subpart IIII, including the following:

1. The emergency generator shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in §60.4202. [40 CFR §60.4205(b)]
2. The diesel fuel fired in the generator shall not exceed 15 ppm sulfur (0.0015% sulfur), except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. Compliance with the fuel sulfur content limit shall be based on fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [40 CFR §60.4207(b) and 06-096 CMR 115]
3. A non-resettable hour meter shall be installed and operated on the generator. [40 CFR §60.4209(a)]
4. The generator 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 §60.4211(f)(3)(i) 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 §60.4211(f) and 06-096 CMR 115]

5. The generator shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by Huber that are approved by the engine manufacturer. Huber may only change those emission-related settings that are permitted by the manufacturer. [40 CFR §60.4211(a)]
6. If Huber 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 §60.4211(f)(3)(i), the facility shall submit an annual report containing the information in §60.4214(d)(1)(i) through (vii). 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). 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 §60.4214(d)]

(27) Emergency Fire Pump

- A. The Emergency Fire Pump 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 115]
- B. The fuel oil sulfur content for the fire pump shall be limited to 0.05%. Compliance shall be demonstrated by fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 CMR 115, BPT]

C. Emissions shall not exceed the following:

| Unit | Pollutant | lb/MMBtu | Origin and Authority |
|---------------------|-----------|----------|----------------------------|
| Emergency Fire Pump | PM | 0.12 | 06-096 CMR 103(2)(B)(1)(a) |

D. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

| Unit | PM (lb/hr) | PM ₁₀ (lb/hr) | SO ₂ (lb/hr) | NO _x (lb/hr) | CO (lb/hr) | VOC (lb/hr) |
|---------------------------------------|---------------|-----------------------------|----------------------------|----------------------------|---------------|----------------|
| Emergency Fire Pump (1.9 MMBtu/hr) | 0.6 | 0.6 | 0.1 | 8.4 | 1.8 | 0.7 |

E. Visible Emissions

1. Visible emissions from the emergency fire pump shall 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. To demonstrate compliance with this condition, Huber shall have at least one employee certified in EPA Method 9 for visible emissions. [06-096 CMR 101]

F. The Emergency Fire Pump shall demonstrate compliance by meeting the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, including the following:

1. No later than May 3, 2013, Huber shall meet the following operational limitations for the compression ignition emergency generator (Emergency Fire Pump):
 - a. Change the oil and filter annually,
 - b. Inspect the air cleaner annually and replace as necessary, 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 115]

2. Huber 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, Huber 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. A non-resettable hour meter shall be installed and operated on fire pump. [40 CFR §63.6625(f)]
4. Maintenance, Testing, and Non-Emergency Operating Situations
 - a. The fire pump shall 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. Huber shall keep records that include maintenance conducted on the fire pump and the hours of operation of the 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 fire pump is 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 Huber 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. The fire pump shall be operated and maintained according to the manufacturer's emission-related written instructions or Huber 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. 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. If Huber 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), beginning January 1, 2015, the diesel fuel fired in the fire pump shall not exceed 15 ppm sulfur (0.0015%). Any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. [40 CFR §63.6604(b)]

8. If Huber 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). 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)]

(28) **Parts Washer**

Parts washers at Huber are subject to the following requirements. Solvent Cleaners, 06-096 CMR 130 (as amended).

- A. Huber shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]
- B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 130]:
1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
 2. Wipe cleaning; and,
 3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
- C. The following standards apply to cold cleaning machines that are applicable sources under 06-096 CMR 130.
1. Huber shall attach a permanent conspicuous label to each unit summarizing the

following operational standards [06-096 CMR 130]:

- (i) Waste solvent shall be collected and stored in closed containers.
 - (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
 - (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
 - (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
 - (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.
 - (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
 - (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material shall be immediately stored in covered containers.
 - (viii) Work area fans shall not blow across the opening of the degreaser unit.
 - (ix) The solvent level shall not exceed the fill line.
2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

(29) **Gasoline Storage Tank**

- A. The fill pipe shall extend within 6 inches of the bottom of the gasoline storage tank. [06-096 CMR 118]
- B. The licensee shall maintain records of the monthly and annual throughput of gasoline. [06-096 CMR 118]

(30) **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. To demonstrate compliance with this condition, Huber shall have at least one employee certified in EPA Method 9 for visible emissions. [06-096 CMR 101]

(31) **Compliance Assurance Monitoring**

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

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

(32) **Monitoring and Recordkeeping Requirements**
[06-096 CMR 140, 117, and 122]

- A. The following are identified as CAM Monitors [40 CFR Part 64]:
1. opacity (measured by COMS)
 2. for the ESP, secondary voltage, primary current and secondary current
 3. for the baghouses, bag leak detection system with alarm
- B. For the COMS recordkeeping shall include:
1. Documentation that the COMS is continuously accurate, reliable and operated in accordance with 06-096 CMR 117 (as amended), 40 CFR Part 51, Appendix P, and 40 CFR Part 60, Appendices B and F;
 2. Records of all measurements, performance evaluations, calibration checks, and maintenance or adjustments for the COMS as required by 40 CFR Part 51 Appendix P;
 3. A report of other data indicative of compliance with the applicable emission standards for those periods when the COMS was not in operation or produced invalid data. In the event the Department does not concur with the licensee's compliance determination, the licensee shall, upon the Department's request, provide additional data, and shall have the burden of demonstrating that the data is indicative of compliance with the applicable standard.

(33) **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, parameter monitors, or Continuous Opacity Monitoring Systems (COMS) required by this license. [06-096 CMR 117 (as amended)]

- A. All control equipment downtimes and malfunctions;
- B. All COMS downtimes and malfunctions;
- C. All parameter monitor downtimes and malfunctions;
- D. 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;

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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.
- E. A report certifying there were no excess emissions, if that is the case.

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

- A. The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on January 31st and July 31st 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 and CAM monitoring required by this license.
- D. Each semiannual report shall include the annual capacity factor of Unit for each fuel.
- E. 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.

(35) **Annual Compliance Certification**

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

The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [06-096 CMR 140]

(36) **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:

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

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

(37) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

| Origin and Authority | Requirement Summary | Enforceability |
|----------------------------|----------------------------------|---------------------------|
| 06-096 CMR 102 | Open Burning | - |
| 06-096 CMR 109 | Emergency Episode Regulation | - |
| 06-096 CMR 110 | Ambient Air Quality Standard | - |
| 06-096 CMR 116 | Prohibited Dispersion Techniques | - |
| 38 M.R.S.A. §585-B, §§5 | Mercury Emission Limit | Enforceable by State-only |

(38) **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]

(39) **Asbestos Abatement**

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

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

- A. Huber 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

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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**

(41) **New Source Review**

Huber 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-62-70-F-R/A, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 28 DAY OF August, 2013

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Come 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: January 29, 2008

Date of application acceptance: February 14, 2008

Date filed with the Board of Environmental Protection:

This Order prepared by Edwin Cousins, Bureau of Air Quality

