Irving Forest Products, Inc./Pinkham Mill	**)**	**Departmental**
Aroostook County	**)**	**Findings of Fact and Order**
Ashland, Maine	**)**	**Part 70 Air Emission License**
A-314-70-A-I	**)**	

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

I. REGISTRATION

A. Introduction:

FACILITY	Irving Forest Products, Inc./Pinkham Mill (Pinkham)
LICENSE NUMBER	A-314-70-A-I
LICENSE TYPE	Initial Part 70 License
SIC CODES	2421
NATURE OF BUSINESS	Wood Products
FACILITY LOCATION	P.O. Box 389, Ashland, ME 04732-0389
DATE OF LICENSE ISSUANCE	December 6, 2000
LICENSE EXPIRATION DATE	December 6, 2005

B. Emission Equipment:

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

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
PBW, Boiler #3	68 MMBtu/hr (biomass) 44.5 MMBtu/hr (diesel/#2 fuel oil)	Babcock and Wilcox Boiler
PD, Boiler #1	10 MMBtu/hr (sawdust)	Dillon Boiler
PCB, Boiler #2	30 MMBtu/hr (diesel/#2 fuel oil)	Cleaver Brooks Boiler
PWY	175 MMBf various stages of lumber	Woodyard
PSM	175 MMBf rough green lumber	Sawmill No. 2
PK	128 MMBf rough dry lumber	Kilns 1-9

PPM	153 MMBf finished dry lumber	Planer Mill
PT1	20,000 Gallons	Diesel Storage Tank

Pinkham has additional insignificant activities which do not need to be listed in the emission equipment table above, but can be found in the application (including small emergency diesel fire pumps).

C. Application Classification:

The application for Pinkham does not include the licensing of increased emissions or the installation of new or modified equipment; therefore, the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

Note that some emissions limits have been changed to demonstrate appropriate limits based on updated AP-42 emission factors.

II. EMISSION UNIT DESCRIPTION

A. Process Description:

Pinkham saws whole logs into lumber. The logs are debarked, sawed, chipped, resawed and sorted in the sawmill area. Next, the lumber is then dried in kilns by applying various cycles of heat and air flow to the stacked lumber. The dried lumber then goes to the planer mill where it is planed, trimmed, cut, chipped, graded and sorted. Annually, the facility produces approximately 120 million board feet (MMBf) of kiln dried lumber consisting mainly of spruce wood species.

B. PBW, Boiler #3:

PBW, boiler #3 was manufactured by Babcock and Wilcox in 1977 with a maximum design heat input capacity of 68 MMBtu/hr firing biomass, and 44.5 MMBtu/hr firing diesel/#2 fuel oil. It is the main boiler used to produce steam for the facility. The biomass fired includes wood, wood chips, sawdust, and bark. A weight scale is used to take continuous readings of biomass usage, estimated at 50% moisture content (4250 Btu/lb heat content). The sulfur content of the diesel/#2 fuel oil shall not exceed 0.5% sulfur by weight. As part of the fuel oil fired, Pinkham may include up to 2,500 gallons of 0.7% sulfur specification waste oil. PBW, boiler #3, is equipped with primary and secondary multiclones to control particulate matter.

The annual fuel limit for the boiler shall be included in the facility-wide total of 250,000 gallons/year of fuel oil and 70,100 tons/year of biomass.

Streamlining
Pinkham accepts streamlining for requirements regarding percent sulfur in the fuel oil. Chapter 106 of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) sulfur limit is more stringent. Therefore, only the more stringent BPT sulfur limit is included in this license.

Periodic Monitoring
Periodic monitoring shall consist of recordkeeping which includes records of fuel oil use through purchase receipts indicating the amount of fuel purchased (gallons) and percent sulfur by weight. Pinkham shall also operate a fuel flow meter on PBW, boiler #3. The amount of biomass fired shall be recorded from the weight scale.

Based on best management practices, the use of multiclones, and the types of fuel for which the boiler was designed, it is unlikely that the boiler will exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

C. PD, Boiler #1:

PD, boiler #1 was manufactured by Dillon in 1963 with a maximum design heat input capacity of 10.0 MMBtu/hr firing sawdust. It is estimated that the moisture content of the sawdust is 62% (heat content 3420 Btu/lb). Boiler #1 operates mainly when boiler #3 is down. Sawdust is carried to the boiler by a front-end loader and the number of buckets used is recorded.

The annual fuel limit for the boiler shall be included in the facility-wide total of 70,100 tons/year of biomass.

Periodic Monitoring
Periodic monitoring shall consist of recordkeeping which includes records of sawdust fired by documenting the weight of the sawdust consumed.

Based on best management practices and the type of fuel for which the boiler was designed, it is unlikely that the boiler will exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from

performing its own testing and may take enforcement action for any violations discovered.

D. PCB, Boiler #2:

PCB, boiler #2 is a spare boiler that only runs occasionally, and was manufactured by Cleaver Brooks in 1974 with a maximum design heat input capacity of 30.0 MMBtu/hr firing diesel/#2 fuel oil. The sulfur content of the diesel/#2 fuel oil shall not exceed 0.5% sulfur by weight.

The annual fuel limit for the boiler shall be included in the facility-wide total of 250,000 gallons/year of fuel oil.

Streamlining
Pinkham accepts streamlining for requirements regarding percent sulfur in the fuel oil. Chapter 106 of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) sulfur limit is more stringent. Therefore, only the more stringent BPT sulfur limit is included in this license.

Periodic Monitoring
Periodic monitoring shall consist of recordkeeping which includes records of fuel oil use through purchase receipts indicating the amount of fuel purchased (gallons) and percent sulfur by weight. Pinkham shall also operate a fuel flow meter on PCB, boiler #2.

Based on best management practices, and the type of fuel for which the boiler was designed, it is unlikely that the boiler will exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

E. PWY, Woodyard

The woodyard is used for log unloading, wood chipping, and wood chip and lumber storage and loading. The lumber in the woodyard includes rough green lumber, rough dry lumber, and finished dry lumber. Pinkham shall be required to control fugitive dust emissions from the woodyard.

F. PSM, Sawmill No. 2

Sawmill no. 2, installed in 1975, consists of debarking, sawing, hogging, chipping, resawing, and sorting. Wood logs are processed through the sawmill,

resulting in rough green lumber and chips. The mill 2 sawdust cyclone is an integral part of the pneumatic conveying system. Mill 2 sawdust cyclone #2 and mill 2 rechipper cyclone vent inside the building and are not emission sources. Emissions from the cyclones vented to the atmosphere shall be limited by opacity.

G. PK, Kilns

The nine lumber kilns at Pinkham are indirect fired and were installed at various dates. Based on 128 MMBf and an emission factor for spruce/fir kiln drying of 1.283 lb VOC/MBF (1000 board feet), VOC emissions from the nine kilns are currently estimated to be 82 ton/year. Pinkham shall be limited to 90 tons/year of VOC emissions from the kilns, based on a 12 month rolling total. Recordkeeping shall include production records and the factor used to calculate VOC emission depending on the species dried.

H. PPM, Planer Mill

The planer mill consists of equipment to plane, trim, cut, chip, grade, and sort lumber. The planer mill chipper #1, and sawdust and shavings cyclones are integral parts of the pneumatic conveying system. The chips from Chipper #1 are blown into trucks. The sawdust and shavings go through cyclones then into bins. The planer mill baghouse vents inside the building and is not an emission source. Emissions from the cyclones vented to the atmosphere shall be limited by opacity.

I. PT1, Diesel Storage Tank:

PT1 is a 20,000 gallon, above ground, diesel storage tank that was manufactured in 1991. The annual throughput of PT1 is 500,000 gallons. PT1 is subject to 40 CFR Part 60, Subpart Kb.

III. AIR QUALITY ANALYSIS

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

ORDER

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

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

The Department hereby grants the Part 70 License A-314-70-A-I, subject to the following conditions:

For each standard and special condition which is State Enforceable only, State Only Enforceability is designated with the following statement: **Enforceable by State Only**

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 emission 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;

(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;

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; **Enforceable by State-only**

(5) The licensee shall pay the annual air emissions license fee to the Department, calculated pursuant to Title 38 MRSA 353;

(6) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;

(7) 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; **Enforceable by State-only**

(8) The licensee shall maintain sufficient records, to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;

(9) 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;

(10) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable;

(11) 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;

(12) 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:

(i) 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;

(ii) to demonstrate compliance with the applicable emission standards; or

(iii) 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 emissions testing; and

(c) submit a written report to the Department within thirty (30) days from the date of test completion.

Enforceable by State-only

(13) 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 where 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 a interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

(14) 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;

(15) 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.

(16) 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;

(17) 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. The licensee shall notify the Department within two (2) days or the next working day, whichever is later, of such occasions and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

(18) 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;

(19) 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;

(20) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequent if specified in the Applicable requirement 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;

(21) 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 the Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

(b) Additional requirements (including excess emissions requirements) become applicable to the 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 emission standards or other terms of 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;

(22) 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.

SPECIAL CONDITIONS

(23) **PBW, Boiler #3**

PBW, Boiler #3 shall comply with each of the following:

A. PBW, Boiler #3 shall not exceed a heat input rate of 68.0 MMBtu/hr of biomass or 44.5 MMBtu/hr firing diesel/#2 fuel oil. To document compliance with the boiler's capacity, a fuel flow meter shall be used when firing oil (max. 320 gal/hr). Weight of the fuel shall be recorded when firing biomass (max. 192 tons/day). [Chapter 140, BPT] **Enforceable by State Only**

B. The sulfur content of the diesel/#2 fuel oil fired in boiler #3 shall not exceed 0.5% by weight demonstrated by purchase records from the supplier. [Chapter 140, BPT]

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

Boiler #3 Emission Limits

Pollutant	lb/MMBtu	Origin &Authority	Enforceability
PM	0.38	Chapter 103	-

Pollutant	lb/hr	Origin & Authority	Enforceability
PM	25.8	Chapter 140, BPT	Enforceable by State Only
PM_{10}	25.8	Chapter 140, BPT	Enforceable by State Only
SO_2	34.7	Chapter 140, BPT	Enforceable by State Only
NOx	20.4	Chapter 140, BPT	Enforceable by State Only
CO	102.7	Chapter 140, BPT	Enforceable by State Only
VOC	1.36	Chapter 140, BPT	Enforceable by State Only

D. Pinkham shall conduct one NOx and one PM stack test during the life of this license. Each stack test shall be conducted in accordance with the appropriate test method in 40 CFR Part 60. [Chapter 140, BPT]

E. Particulate matter (PM, PM_{10}) emissions from Boiler #3 shall be controlled by the operation and maintenance of primary and secondary multiclones. Pinkham shall keep maintenance records for the multiclones. [Chapter 140, BPT]

F. Pinkham shall operate Boiler #3 such that the opacity does not exceed 30% based on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period. [Chapter 140, BPT]

G. Pinkham may burn no more than 2,500 gallons/year of specification waste oil in Boiler #3. The annual limit shall be met over a 12-month rolling total. Only waste oil meeting the criteria "specification" or "off-specification" waste oil (as defined in the "Waste Oil Management Rules") shall be burned in Boiler #3. The sulfur content of the waste oil shall not exceed 0.7% by weight demonstrated by test results performed on a representative sample of onsite generated Specification or Off-Specification waste oil. [Chapter 140, BPT] **Enforceable by State Only**

H. Ash from Boiler #3 shall be disposed of in accordance with the Bureau of Remediation and Waste Management (BRWM). Ash shall be sufficiently conditioned with water or transported in sealed containers so as to prevent fugitive emissions. [Chapter 140, BPT] **Enforceable by State Only**

(24) **PD, Boiler #1**

PD, Boiler #1 shall comply with each of the following:

A. PD, Boiler #1 shall not exceed a heat input rate of 10.0 MMBtu/hr, firing sawdust. To document compliance with the boiler's capacity, the weight of the sawdust fired shall be determined by weighing a full bucket of sawdust and recording the number of buckets used (max. 35 tons/day). [Chapter 140, BPT] **Enforceable by State Only**

B. Emissions from Boiler #1 shall not exceed the following limits:

Boiler #1 Emission Limits

Pollutant	lb/MMBtu	Origin &Authority	Enforceability
PM	0.61	Chapter 103	-

Pollutant	lb/hr	Origin & Authority	Enforceability
PM	6.10	Chapter 140, BPT	Enforceable by State Only
PM_{10}	6.10	Chapter 140, BPT	Enforceable by State Only
SO_2	0.10	Chapter 140, BPT	Enforceable by State Only
NO_X	2.50	Chapter 140, BPT	Enforceable by State Only
CO	7.30	Chapter 140, BPT	Enforceable by State Only
VOC	0.20	Chapter 140, BPT	Enforceable by State Only

C. Pinkham shall operate Boiler #1 such that the opacity does not exceed 30% based on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period. [Chapter 140, BPT]

D. Ash from Boiler #1 shall be disposed of in accordance with the Bureau of Remediation and Waste Management (BRWM). Ash shall be sufficiently conditioned with water or transported in sealed containers so as to prevent fugitive emissions. [Chapter 140, BPT] **Enforceable by State Only**

(25) **PCB, Boiler #2**

PCB, Boiler #2 shall comply with each of the following:

A. PCB, Boiler #2 shall not exceed a heat input rate of 30.0 MMBtu/hr firing #2 fuel oil. To document compliance with the boiler's capacity, a fuel flow meter shall be used when firing oil (max. 214 gal/hr) [Chapter 140, BPT] **Enforceable by State Only**

B. The sulfur content of the #2 fuel oil fired in the Boiler #2 shall not exceed 0.5% by weight demonstrated by purchase records from the supplier. [Chapter 140, BPT]

C. Emissions from Boiler #2 shall not exceed the following limits:

Boiler #2 Emission Limits

Pollutant	Lb/MMBtu	Origin &Authority	Enforceability
PM	0.20	Chapter 103	-

Pollutant	lb/hr	Origin & Authority	Enforceability
PM	6.0	Chapter 140, BPT	Enforceable by State Only
PM_{10}	6.0	Chapter 140, BPT	Enforceable by State Only
SO_2	15.3	Chapter 140, BPT	Enforceable by State Only
NOx	7.50	Chapter 140, BPT	Enforceable by State Only
CO	1.20	Chapter 140, BPT	Enforceable by State Only
VOC	0.30	Chapter 140, BPT	Enforceable by State Only

D. Pinkham shall operate Boiler #2 such that the opacity does not exceed 30% based on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period. [Chapter 140, BPT]

E. Ash from Boiler #2 shall be disposed of in accordance with the Bureau of Remediation and Waste Management (BRWM). Ash shall be sufficiently conditioned with water or transported in sealed containers so as to prevent fugitive emissions. [Chapter 140, BPT] **Enforceable by State Only**

(29) **Facility Fuel Use**

A. Pinkham shall not exceed a facility wide fuel cap of 250,000 gallons/year of #2 fuel oil with a sulfur content not to exceed 0.5% by weight, based on a 12 month rolling total. Fuel use records documenting compliance with this limit include fuel flow monitor data and purchase records. [Chapter 140, BPT]

B. Pinkham shall not exceed a facility wide fuel cap of 70,100 tons/year of biomass, based on a 12 month rolling total. Records documenting compliance with this limit include biomass weight records. [Chapter 140, BPT]

(30) **Wood Chip Piles**

Opacity from the fuel (wood chip) storage area shall not exceed 5% opacity based on three (3) minute block averages. The chips shall be wetted with sufficient water to eliminate visible emission in excess of 5% opacity based on three (3) minute block averages. [Chapter 140, BPT] **Enforceable by State Only**

(31) **Process Cyclones**

A. For each of the process cyclones exhausting to the atmosphere, Pinkham shall not exceed an opacity of 20% on a six minute block average bases, except for no more than 1 six minute block average in a one hour period. [Chapter 140, BPT]

B. Pinkham shall keep records documenting maintenance, malfunctions, and downtime of the cyclones. [Chapter 140, BPT]

(32) **PK, Kilns**

Pinkham shall be limited to 90 tons/year VOC from the wood kilns on a 12 month rolling total basis. Documentation to show compliance with this limit shall be the monthly kiln throughput rate and the VOC emission factor used for the specific species of wood dried. [Chapter 140, BPT] **Enforceable by State Only**

(33) **PTI, Diesel Storage Tank**

PTI, Diesel Storage Tank shall comply with each of the following:

A. PTI, Diesel Storage Tank shall not exceed a capacity of 20,000 gallons with an annual throughput of 250,000 gallons. [Chapter 140, BPT]

B. Pinkham shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the source. [40 CFR Part 60 Subpart Kb]

(34) **Annual Facility Emissions**

The total annual emissions from the boilers and kilns shall not exceed the following: [Chapter 140, BPT] **Enforceable by State Only**

Pollutant	TPY	Origin & Authority
PM	123	Chapter 140, BPT
PM_{10}	123	Chapter 140, BPT
SO_2	10.0	Chapter 140, BPT
NO_X	95.4	Chapter 140, BPT
CO	479	Chapter 140, BPT
VOC	97.03*	Chapter 140, BPT

* Includes 7.03 tpy from fuel burning equipment and 90 tpy from kilns.

(35) **Permit Shield for Non-Applicable Requirements**

The following requirements have been specifically identified as not applicable based upon information submitted by Pinkham in an application dated March 20, 1998.

CITATION	DESCRIPTION	BASIS FOR DETERMINATION
Chapter 104	Incinerator Particulate Emission Standard	Pinkham's boilers are not classified as incinerators.
Chapter 111	Petroleum Liquid Storage Vapor Control	Vapor pressures and tank sizes below applicability thresholds.
Chapter 126	Capture Efficiency Test Procedure	No add-on control devices used to control VOCs subject to Chapter 123.
Chapter 134	Reasonably Available Control Technology for Facilities that Emit Volatile Orgainc Compounds	Total facility emits less than 40 TPY of VOCs from equipment subject to control.
Chapter 138	Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides	Total facility emits less than 100 TPY of NOx.
40 CFR, Part 60, subpart Da	NSPS for Electric Utility Steam Generating Units	Facility boilers rated below applicability threshold.
40 CFR, Part 60, subpart Db	NSPS for Industrial-Commercial-Institutional Steam Generating Units	Facility boilers rated below applicability threshold.
40 CFR, Part 60, subpart Dc	NSPS for Small Industrial-Commercial-Institutional Steam Generating Units	Facility boilers constructed prior to applicability date.

(36) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due January 31 and July 31.

A. Each semiannual report shall include a summary of the periodic monitoring required by this license.

B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

[MEDEP Chapter 140]

(37) **Annual Compliance Certification**

Pinkham shall submit an annual compliance certification to the Department in accordance with Condition (20) of this license. The annual compliance certification is due January 31. [MEDEP Chapter 140]

(38) **Annual Emission Statement**

The licensee shall annually report to the Department, in a specified format, fuel use, operating rates, use of materials and other information necessary to accurately update the State's emission inventory. [MEDEP Chapter 137] **Enforceable by State only**

(39) The licensee is subject to the State regulations listed below.

Origin and Authority	Requirement Summary
Chapter 102	Open Burning
Chapter 109	Emergency Episode Regulation
Chapter 110	Ambient Air Quality Standard
Chapter 116	Prohibited Dispersion Techniques

(40) **Certification by a Responsible Official**
All reports (including quarterly reports, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

(41) This term of this license shall be five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2000.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application March 19, 1998.
Date of application acceptance March 20, 1998.

Date filed with Board of Environmental Protection _____

This Order prepared by Kathleen E. Neil, Bureau of Air Quality.