



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

DEPARTMENT ORDER

Cousineau Wood Products of Maine,  
LLC  
Somerset County  
North Anson, Maine  
A-103-71-P-R/M

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

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

Cousineau Wood Products of Maine, LLC (Cousineau) has applied to renew their Air Emission License for the operation of emission sources associated with their wood products and laminated wood manufacturing facility. Cousineau has also requested a minor revision to their license in order to remove Boiler #3, the Emergency Generator, Kiln #2, and the Parts Washer. Cousineau has also requested to revise the fuel limit of the wood fired in Boiler #1 from 24,000 ton/yr to 1,000 ton/yr and remove used oil as an option to fire in the boiler.

The equipment addressed in this license is located at 3 Valley Road, North Anson, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Boiler #1	27.0	3 ton/hr	Biomass	1977	1977	1
Veneer Dryer	1.4	15.4 gal/hr	Propane	1994	2010	9
Boiler #3*	1.0	0.05 ton/hr	Wood Used oil	Early 2000's	2008	7

\* Removed from license

### Stationary Engines

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (kW)	Fuel Type	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.
<i>Emergency Generator*</i>	1.22	125	<i>Distillate fuel</i>	8.9	1977	1977

\* Removed from license

### Process Equipment

Equipment	Production Rate	Pollution Control Equipment	Stack #
Paint Spray Booth	--	Filters	3
Wood Waste and Byproducts Handling Equipment: - Sawdust and Wood Waste Blow System - Bagger Silo (wood shavings)	--	Dust collector Cyclone separator	--
Finger Jointing Process	--	--	Fugitive
Vener Laminating Line - Veneer Dryer (non-combustion emissions) - RF#1 Press - Dipping Tub - Drying Racks	2 MMBF/yr 30,000 gal/yr 0.2 MMBF/yr	--	Fugitive
DymaLux Line - HP#1 Press - Resin Dip	1 MMBF/yr (HP#1 Press)	--	Fugitive
UV#1 Line (including application of Wood Sealer and Top Coat)	1,000 ft <sup>2</sup> /month	--	--
<i>Kiln #2*</i>	<i>50,000 BF/load</i>	--	<i>Fugitive</i>

\* Removed from license

### Parts Washer

Equipment	Size Capacity	Pollution Control Equipment
<i>Parts Washer*</i>	<i>30 gallons</i>	<i>N/A</i>

\* Removed from license

C. Definitions

Biomass means any biomass-based solid fuel that is not a solid waste. This includes, but is not limited to, wood residue and wood products (*e.g.*, trees, tree stumps, tree limbs, bark, lumber, sawdust, sander dust, chips, scraps, slabs, millings, and shavings). This definition also includes wood chips and processed pellets made from wood or other forest residues. Inclusion in this definition does not constitute a determination that the material is not considered a solid waste. Cousineau should consult with the Department before adding any new biomass type to its fuel mix.

Records or Logs mean either hardcopy or electronic records.

D. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the date this license was issued.

Cousineau has applied to renew currently licensed emission units as well as modify their license as addressed in Section I(A) above. This amendment will not increase licensed emissions of any pollutant. Therefore, this license is considered to be both a renewal and a minor revision and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules C.M.R. ch. 115.

E. Facility Classification

With the VOC emission limits on the process equipment, the facility is licensed as follows:

- As a synthetic minor source of air emissions for criteria pollutants, because Cousineau is subject to license restrictions that keep facility emissions below major source thresholds for VOC; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

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

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment.

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

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

**B. Facility Description**

Cousineau is a manufacturing facility which produces solid wood, veneer, and laminated wood products. All the lumber is sourced from outside vendors. The veneer and laminated products are used by Cousineau's customers in a variety of fabrication applications to create final consumer products, such as gun stocks and pepper mills. Cousineau offers custom sized panels, blanks, and dowels to suit manufacturing needs. Cousineau uses yellow birch, walnut, birch, and occasionally maple species.

Sawdust from the cutting, planing, and sanding processes is pneumatically conveyed through a cyclone or via a vibrating conveyor and transported to storage bins. From the bins, the sawdust is sold to biomass customers to be used as wood fuel. Larger wood waste pieces are chipped and sold for the same purpose.

**C. Boiler #1**

Boiler #1 fires biomass fuel with a maximum capacity of 27 MMBtu/hour. The licensed biomass fuel includes wood chips, sawdust, bark, chipped pallets, and wood with paint residue. Exhaust from Boiler #1 passes through a fly ash reinjection system before exiting through its own stack, Stack #1.

**1. BPT Findings**

The BPT emission limits for Boiler #1 were based on the following:

**Biomass**

PM/PM <sub>10</sub> /PM <sub>2.5</sub>	– 0.3 lb/MMBtu based on 06-096 C.M.R. ch. 103 § 2(A)(3)
SO <sub>2</sub>	– 0.025 lb/MMBtu based on AP-42 Table 1.6-2 dated 4/22
NO <sub>x</sub>	– 0.22 lb/MMBtu based on AP-42 Table 1.6-2 dated 4/22
CO	– 0.6 lb/MMBtu based on AP-42 Table 1.6-2 dated 4/22
VOC	– 0.017 lb/MMBtu based on AP-42 Table 1.6-3 dated 4/22

The BPT emission limits for Boiler #1 are the following:

Unit	Pollutant	lb/MMBtu
Boiler #1	PM	0.3

Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	8.10	8.10	8.10	0.68	5.94	16.20	0.46

Cousineau shall be limited to burning 1,000 tons of wood in Boiler #1 on a calendar year total basis. [06-096 C.M.R. ch. 115, BPT]

Cousineau shall calculate the fuel use for Boiler #1 using the following formula:

$$\frac{\text{ton wood}}{\text{day}} = \frac{x \text{ gal water}}{\text{day}} \times \frac{8.34 \text{ lb steam}}{\text{gal water}} \times \frac{3 \times 10^{-4} \text{ ton wood}}{\text{lb steam}}$$

[A-103-71-L-R (February 5, 2009), BPT]

## 2. Visible Emissions

Visible emissions from Boiler #1 shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time Cousineau shall either meet the normal operating visible emissions standard or the following alternative visible emissions standard.

During periods of startup, shutdown, or malfunction, visible emissions shall not exceed 40% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive six-minute block averages) per event. If this alternative visible emissions standard is utilized, Cousineau shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.

[06-096 C.M.R. ch. 101, § 4(A)(5)(a)]

## 3. Periodic Monitoring

Periodic monitoring for Boiler #1 shall include recordkeeping to document fuel use both on a monthly and calendar year total basis

4. New Source Performance Standards (NSPS): 40 C.F.R. Part 60, Subpart Dc

Due to the year of manufacture, the boiler is not subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr manufactured after June 9, 1989. [40 C.F.R. § 60.40c]

5. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJ

Boiler #1 is subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ. The unit is considered an existing biomass boiler rated more than 10 MMBtu/hr. [40 C.F.R. §§ 63.11193 and 63.11195]

a. Compliance Dates, Notifications, and Work Practice Requirements

(1) Boiler Tune-Up Program

(i) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]

(ii) Tune-ups shall be conducted every 2 years. [40 C.F.R. § 63.11223(a) and Table 2]

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

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]
2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]
3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are

made). Measurements may be taken using a portable CO analyzer.  
[40 C.F.R. § 63.11223(b)(5)]

6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up.  
[40 C.F.R. § 63.11223(b)(7)]

(iv) Tune-Up Report: A tune-up report shall be maintained onsite and, submitted to the Department and/or EPA upon request. The report shall contain the following information:

1. The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
2. A description of any corrective actions taken as part of the tune-up of the boiler; and
3. The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.  
[40 C.F.R. § 63.11223(b)(6)]

## (2) Compliance Report

For every two-year compliance period, Cousineau shall prepare a compliance report by March 1<sup>st</sup> of the following year to document the information below for the two-year period. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

- (i) Company name and address;
- (ii) A statement of whether the source has complied with all the relevant requirements of this Subpart;
- (iii) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
- (iv) The following certifications, as applicable:
  1. "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
  2. "No secondary materials that are solid waste were combusted in any affected unit."
  3. "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and

shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

b. Recordkeeping

- (1) Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJ including the following [40 C.F.R. § 63.11225(c)]:
  - (i) Copies of notifications and reports with supporting compliance documentation;
  - (ii) Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
  - (iii) Records of the occurrence and duration of each malfunction of each applicable boiler; and
  - (iv) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.
- (2) Records shall be in a form suitable and readily available for expeditious review. Each record must be kept for 5 years following the date of each recorded action. Each record must be kept on-site or be accessible from a central location by computer or other means that instantly provides access at the site for at least 2 years after the date of each recorded action. The records may be maintained off-site for the remaining 3 years. [40 C.F.R. § 63.11225(d)] Note: Standard Condition (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJ shall be streamlined to the more stringent six-year requirement.

D. Veneer Dryer

Cousineau operates a propane-fired Veneer Dryer for the Veneer Laminating Line. The Veneer Dryer has a rated heat input of 1.4 MMBtu/hour. The unit was manufactured in 1994 and installed in 2010, and exhausts through its own stack, Stack #9.

1. BPT Findings

The BPT emission limits for the Veneer Dryer were based on the following:

Propane

- |  |  |
|--|--|
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | — 0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT        |
| SO <sub>2</sub>                        | — 0.054 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08 |
| NO <sub>x</sub>                        | — 13 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08    |



- CO – 7.5 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08  
VOC – 1 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08

Note: Possible VOC and HAP emissions released from the product during the veneer drying process are accounted for in the Veneer Laminating Line VOC and HAP contents and materials usage records.

The BPT emission limits for the Veneer Dryer are the following:

Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Veneer Dryer	0.07	0.07	0.07	0.001	0.20	0.12	0.02

2. Visible Emissions

Visible emissions from the Veneer Dryer stack shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(3)]

3. New Source Performance Standards (NSPS): 40 C.F.R. Part 60, Subpart Dc

Due to the size and due to the fact that the Veneer Dryer is not a steam generating unit the Veneer Dryer is not subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr manufactured after June 9, 1989. [40 C.F.R. § 60.40c]

4. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJ

The Veneer Dryer is not subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ. The Veneer Dryer fires propane and does not meet the definition of a boiler as defined in 40 C.F.R. § 63.11237 and is therefore exempt from 40 C.F.R. Subpart JJJJJ. [40 C.F.R. §§ 63.11193, 63.11195, and 63.11237]

E. Paint Spray Booth

Cousineau operates one Paint Spray Booth, which is primarily used to coat skateboards. Regulated air pollutants emitted from this process include PM and VOC. There are no HAP-containing coatings applied in the Paint Spray Booth.

1. BPT Findings [06-096 C.M.R. ch. 115, BPT]

The following requirements are considered BPT for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC emissions:

- a. Cousineau uses particulate filters in the Paint Spray Booth to control PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions. The particulate filters shall be inspected monthly and replaced as required. All corrective or preventative maintenance performed on the particulate filters shall be documented in a maintenance log and made available to the Department upon request.
- b. VOC emissions from coatings sprayed in the Paint Spray Booth shall not exceed 1.0 ton per year on a calendar year total basis.
- c. Record and maintain records of the types and quantities of coatings used in the Paint Spray Booth and the VOC content of each, and any other applicable information.
- d. Calculate monthly VOC emissions from the Paint Spray Booth using the following mass balance equations for VOC-containing coatings:

$$\text{Monthly VOC Emissions} = \sum_{i=1}^n (A \times \text{VOC content})$$

Where:

i = Each VOC containing coating used at the facility during the month.

n = The number of VOC-containing coatings used in the Paint Spray Booth during the month.

A = Monthly purchases of VOC-containing coatings.

2. Visible Emissions

- a. Chapter 101

Visible emissions from the Paint Spray Booth shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

b. Chapter 115, BPT

Visible emissions from the Paint Spray Booth shall not exceed 5% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

c. Visible Emissions Streamlining

The Department had determined that the BPT visible emission limit is more stringent than the applicable limit in 06-096 C.M.R. ch. 101. Therefore, the visible emission limit from the Paint Spray Booth has been streamlined to the more stringent BPT limit, and only this more stringent limit shall be included in the air emission license. [06-096 C.M.R. ch. 115, BPT]

3. *Surface Coating Facilities*: 06-096 C.M.R. ch. 129

Cousineau is not subject to *Surface Coating Facilities*, 06-096 C.M.R. ch. 129 because it does not fall under any of the applicable surface coating categories. [06-096 C.M.R. ch. 129 1(A)]

F. Wood Waste and Byproducts Handling Equipment

Cousineau operates a Sawdust and Wood Waste Blower System and a Bagger Silo that stores the wood shavings. All of the wood waste is either treated (exposed to either a clear finish or dye) or untreated. This waste is in a solid wood form and piled until enough of it is gathered to grind into chips and hauled to a processor, where it is either burned as biomass fuel or processed into wood pellets. Cousineau uses a dust collector to control PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions.

1. BPT Findings [06 096 C.M.R. ch. 115, BPT]

- a. Cousineau shall operate the dust collector to control PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the Sawdust and Wood Waste Blower System. The dust collector shall have a design PM/PM<sub>10</sub>/PM<sub>2.5</sub> control efficiency of 99.9%. The dust collector shall be checked weekly and emptied when full. All corrective or preventative maintenance performed on the dust collector shall be documented in a maintenance log and made available to the Department upon request.
- b. Cousineau shall operate the cyclone separator to control PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the Bagger Silo. The central cyclone separator empties the dust into a hopper which is checked weekly and emptied when full or near full. Other stand-alone cyclone separators are also used and these separators use bags to collect the dust. These bags, which are located next to the operator, shall be monitored during operation and emptied when full. All corrective or preventative maintenance

performed on the cyclone separator shall be documented in a maintenance log and made available to the Department upon request.

**2. Visible Emissions**

- a. Visible Emissions from the Sawdust and Wood Waste Blower System shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(3)]
- b. Visible emissions from the Bagger Silo shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

**G. Finger Jointing Process**

Cousineau operates a finger jointing operation, which helps reduce waste by reclaiming smaller lengths of wood. Emissions of VOC and/or HAP are released in this process from the glues and adhesives used to join the materials.

**1. BPT Findings [06-096 C.M.R. ch. 115, BPT]**

- a. Cousineau shall not exceed 0.1 tons per year of VOC emissions from the finger jointing process based on a calendar year total. Cousineau has a facility-wide HAP emissions limit, specified in Section II(K) below.
- b. Cousineau shall record and maintain records of the types and quantities of glues and adhesives used in the Finger Jointing Process and the VOC content of each, and any other applicable information.
- c. Calculate monthly VOC emissions using the following mass balance equations for the applicable:

$$\text{Monthly VOC Emissions} = \sum_{i=1}^n (A \times \text{VOC content})$$

Where:

i = Each VOC containing material used at the facility during the month.

n = The number of VOC-containing materials used at the facility during the month.

A = Monthly facility purchases of VOC-containing materials.

2. Visible Emissions

Visible emissions from the Finger Jointing Process shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

H. Veneer Laminating Line

Cousineau operates a Veneer Laminating Line for the production of wooden gunstocks. The Veneer Laminating Line includes the Veneer Dryer, RF#1 Press, Veneer Dyes, Dipping Tub, and Drying Racks. The RF #1 Press is a radio frequency glue press with a capacity of 850,000 BF/year of finished material. Some glues used in this laminating process contain small amounts of VOC and/or HAPs. After the products go through the Veneer Dryer and Press, they are placed in the Dipping Tubs and put under pressure. After the Dipping Tubs, the products are transferred to the Drying Racks.

1. BPT Findings [06-096 C.M.R. ch. 115, BPT]

- a. Cousineau shall be limited to 5.0 tons per year of non-combustion VOC emissions from the Veneer Laminating Line on a calendar year total basis. Cousineau has a facility-wide HAP emissions limit, specified in Section II(K) below.
- b. Cousineau shall record and maintain records of the types and quantities of glues used in the Veneer Laminating Line and the VOC content of each, and any other applicable information.
- c. Calculate monthly VOC emissions using the following mass balance equations for the applicable:

$$\text{Monthly VOC Emissions} = \sum_{i=1}^n (A \times \text{VOC content})$$

Where:

i = Each VOC containing material used at the facility during the month.

n = The number of VOC-containing materials used at the facility during the month.

A = Monthly facility purchases of VOC-containing materials.

**2. Visible Emissions**

**a. Chapter 101**

Visible emissions from the Veneer Laminating Line shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

**b. Chapter 115, BPT**

Visible emissions from the Veneer Laminating Line shall not exceed 5% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

**c. Visible Emissions Streamlining**

The Department had determined that the BPT visible emission limit is more stringent than the applicable limit in 06-096 C.M.R. ch. 101. Therefore, the visible emission limit from the Veneer Laminating Line has been streamlined to the more stringent BPT limit, and only this more stringent limit shall be included in the air emission license. [06-096 C.M.R. ch. 115, BPT]

**I. DymaLux Line**

The resin-impregnated laminated wood product line, the DymaLux line, starts with wood veneer which has (or has not, as required by the customer's specifications) been dyed, dried, and stored in a climate-controlled environment until needed for production. To manufacture the DymaLux material, veneer is impregnated with resin glue, dried to the desired moisture content, then hot-pressed to cure the glue, forming solid panels of DymaLux product, a waterproof and heat resistant material with extremely high density, hardness, and durability. The DymaLux line includes HP#1 Press and Resin Dip. Air pollutant emissions from this process are VOC and HAP contained in the resin. There are no other air pollutants emitted from the DymaLux manufacturing process.

**1. BPT Findings**

- a. Cousineau shall be limited to 1.1 tons per year of VOC emissions from the DymaLux Line on a calendar year total basis. Cousineau has a facility-wide HAP emissions limit, specified in Section II(K) below.
- b. Cousineau shall record and maintain records of the types and quantities of resins used in the DymaLux Line and the VOC content of each, and any other applicable information.

- c. Calculate monthly VOC emissions using the following mass balance equations for the applicable:

$$\text{Monthly VOC Emissions} = \sum_{i=1}^n (A \times \text{VOC content})$$

Where:

i = Each VOC containing material used at the facility during the month.

n = The number of VOC-containing materials used at the facility during the month.

A = Monthly facility purchases of VOC-containing materials.

## 2. Visible Emissions

Visible emissions from the DymaLux Line shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

## 3. 06-096 C.M.R. ch. 129, *Surface Coating Facilities*

The requirements of 06-096 C.M.R. ch. 129 are not applicable to the DymaLux Line. The rule is applicable to the surface coating of various substrates which, as defined in the rule, means the surface to which a coating is applied. The wood substrate is impregnated with resin in the DymaLux process; thus, the resin is not a surface coating. [06-096 C.M.R. ch. 129 § 2(A)(16)]

## 4. 06-096 C.M.R. ch. 159, *Control of Volatile Organic Compounds from Adhesives and Sealants*

The requirements of 06-096 C.M.R. ch. 159 are not applicable to the DymaLux Line. This rule applies to uses within Maine of any adhesive, sealant, adhesive primer, or sealant primer, applied to a product for compensation. No material is used in the DymaLux process for these purposes, as defined in the rule. [06-096 C.M.R. ch. 159 § 1(A)]

## J. UV #1 Line

The UV #1 Line is a separate plywood coating line, installed in December 2013, and includes the treatment of plywood with wood sealer and top coating. The UV #1 Line starts when a conveyor belt feeds the plywood into a machine that applies a clear coating on the plywood. Then the boards are fed through another machine that exposes the plywood to a ultraviolet light which rapidly dries and cures the boards before they exit the UV #1 Line. The machines are connected to one another so the entire process takes place within the

machines. There are no HAPs contained in the wood sealer and coating materials used in this process.

**1. BPT Findings**

- a. Cousineau shall be limited to 0.2 tons per year of VOC emissions from the UV #1 Line on a calendar year total basis.
- b. Cousineau shall record and maintain records of the types and quantities of wood sealer and coating material used in the UV #1 Line and the VOC content of each, and any other applicable information.
- c. Calculate monthly VOC emissions using the following mass balance equations for the applicable:

$$\text{Monthly VOC Emissions} = \sum_{i=1}^n (A \times \text{VOC content})$$

Where:

i = Each VOC containing material used at the facility during the month.

n = The number of VOC-containing materials used at the facility during the month.

A = Monthly facility purchases of VOC-containing materials.

**2. Visible Emissions**

Visible emissions from the UV #1 Line shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

**K. Process HAP Emissions**

Cousineau shall not exceed a facility limit of 7.9 tons per year of any single HAP or 19.9 tons per year of total combined HAPs on a calendar year total basis. This shall include HAP emissions from the Finger Jointing Process, the Veneer Laminating Line, and the DymaLux Line.

Cousineau shall track HAP emissions by doing the following:

1. Record and maintain records of the types and quantities of materials purchased at the facility and the VOC and HAP content of each, and any other applicable information.



2. Calculate monthly HAP emissions using the following mass balance equations for the applicable materials purchased at the facility:

$$\text{Monthly HAP Emissions} = \sum_{i=1}^n (A \times \text{HAP content})$$

Where:

i = Each HAP containing material used at the facility during the month.

n = The number of HAP containing materials used at the facility during the month.

A = Monthly facility purchases of HAP-containing materials.

[06-096 C.M.R. ch. 115, BPT]

**L. General Process Emissions**

1. Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]
2. Visible emissions from any baghouse shall not exceed 10% on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(3)]

**M. Fugitive Emissions**

Cousineau shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.

Cousineau shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22.

[06-096 C.M.R. ch. 101, § 4(C)]

N. Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility's annual air license fee and establishing the facility's potential to emit (PTE). Only licensed equipment is included, i.e., emissions from insignificant activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included except when required by state or federal regulations. Maximum potential emissions were calculated based on the following assumptions:

- Firing 1,000 ton/yr wood in Boiler #1;
- Operating the Veneer Dryer for 8,760 hr/yr; and
- VOC limits from the Paint Spray Booth, Finger Jointing Process, Veneer Laminating Line, DymaLux Line, and UV Line as listed in the table below.

This information does not represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

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

	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Boiler #1	1.4	1.4	1.4	0.1	1.0	2.7	0.1
Veneer Dryer	0.3	0.3	0.3	--	0.9	0.5	0.1
Paint Spray Booth	--	--	--	--	--	--	1.0
Finger Jointing Process	--	--	--	--	--	--	0.1
Veneer Laminating Line	--	--	--	--	--	--	5.0
DymaLux Line	--	--	--	--	--	--	1.1
UV #1 Line	--	--	--	--	--	--	0.2
<b>Total TPY</b>	<b>1.7</b>	<b>1.7</b>	<b>1.7</b>	<b>0.1</b>	<b>1.9</b>	<b>3.2</b>	<b>7.6</b>

Pollutant	Tons/year
Single HAP	7.9
Total HAP	19.9

### **III.AMBIENT AIR QUALITY ANALYSIS**

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

<b>Pollutant</b>	<b>Tons/Year</b>
PM <sub>10</sub>	25
PM <sub>2.5</sub>	15
SO <sub>2</sub>	50
NO <sub>x</sub>	50
CO	250

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

This determination is based on information provided by the applicant regarding licensed emission units. If the Department determines that any parameter (e.g., stack size, configuration, flow rate, emission rates, nearby structures, etc.) deviates from what was included in the application, the Department may require Cousineau to submit additional information and may require an ambient air quality impact analysis at that time.

### **ORDER**

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

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

The Department hereby grants Air Emission License A-103-71-P-R/M subject to following conditions.

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

**STANDARD CONDITIONS**

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S. § 347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to beginning actual construction of a modification, unless specifically provided for in Chapter 115. [06-096 C.M.R. ch. 115]
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 C.M.R. ch. 115]
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 C.M.R. ch. 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S. § 353-A. [06-096 C.M.R. ch. 115] Payment of the annual air emission license fee for Cousineau is due by the end of February of each year. [38 M.R.S. § 353-A(3)]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 C.M.R. ch. 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 C.M.R. ch. 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated

noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license.  
[06-096 C.M.R. ch. 115]

- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.  
[06-096 C.M.R. ch. 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:
- A. Perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
    - 1. Within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
    - 2. Pursuant to any other requirement of this license to perform stack testing.
  - B. Install or make provisions to install test ports that meet the criteria of 40 C.F.R. Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
  - C. Submit a written report to the Department within thirty (30) days from date of test completion.  
[06-096 C.M.R. ch. 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. Within thirty (30) days following receipt of the written test report by the Department, or another alternative timeframe approved by the Department, 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 C.F.R. 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 C.M.R. ch. 115]

- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or license requirement. [06-096 C.M.R. ch. 115]
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 C.M.R. ch. 115]
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 C.M.R. ch. 115]
- (16) The licensee shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S. § 605). [06-096 C.M.R. ch. 115]

## **SPECIFIC CONDITIONS**

### **(17) Boiler #1**

#### **A. Fuel**

- 1. Boiler #1 is licensed to fire biomass fuel. The licensed biomass fuel includes wood chips, sawdust, bark, chipped pallets, and wood with paint residue. [06-096 C.M.R. ch. 115, BPT]

2. Total fuel use for Boiler #1 shall not exceed 1,000 ton/yr of biomass fuel, based on a calendar year total basis. [06-096 C.M.R. ch. 115, BPT]
3. Cousineau shall calculate the fuel use for Boiler #1 using the following formula:

$$\frac{\text{ton wood}}{\text{day}} = \frac{x \text{ gal water}}{\text{day}} \times \frac{8.34 \text{ lb steam}}{\text{gal water}} \times \frac{3 \times 10^{-4} \text{ ton wood}}{\text{lb steam}}$$

[A-103-71-L-R (February 5, 2009), BPT]

- B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.3	06-096 C.M.R. ch. 115, BPT

- C. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	8.10	8.10	8.10	0.68	5.94	16.20	0.46

- D. Visible Emissions

Visible emissions from Boiler #1 shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time Cousineau shall either meet the normal operating visible emissions standard or the following alternative visible emissions standard.

During periods of startup, shutdown, or malfunction, visible emissions shall not exceed 40% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive six-minute block averages) per event. If this alternative visible emissions standard is utilized, Cousineau shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.

[06-096 C.M.R. ch. 101, § 4(A)(5)(a)]

- E. Cousineau shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJ applicable to Boiler #1 including, but not limited to, the following: [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]
  - a. Each tune-up shall be conducted every two years. [40 C.F.R. § 63.11223(a) and Table 2]
  - b. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
    - (1) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]
    - (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]
    - (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]
    - (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
    - (5) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]
    - (6) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 C.F.R. § 63.11223(b)(7)]
  - c. Tune-Up Report: A tune-up report shall be maintained onsite and submitted to the Department and EPA upon request. The report shall contain the following information:
    - (1) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
    - (2) A description of any corrective actions taken as part of the tune-up of the boiler; and
    - (3) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]



**2. Compliance Report**

For every two-year compliance period, Cousineau shall prepare a compliance report shall be prepared by March 1<sup>st</sup> of the following year to document the information below for the two-year period. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

- a. Company name and address;
- b. A statement of whether the source has complied with all the relevant requirements of this Subpart;
- c. A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
- d. The following certifications, as applicable:
  - (1) "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
  - (2) "No secondary materials that are solid waste were combusted in any affected unit."
  - (3) "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

**3. Recordkeeping**

- a. Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJ including the following [40 C.F.R. § 63.11225(c)]:
  - (1) Copies of notifications and reports with supporting compliance documentation;
  - (2) Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
  - (3) Records of the occurrence and duration of each malfunction of each applicable boiler; and
  - (4) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.
- b. Records shall be in a form suitable and readily available for expeditious review. Each record must be kept for 5 years following the date of each recorded action.

Each record must be kept on-site or be accessible from a central location by computer or other means that instantly provides access at the site for at least 2 years after the date of each recorded action. The records may be maintained off-site for the remaining 3 years. [40 C.F.R. § 63.11225(d)] Note: Standard Condition (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ shall be streamlined to the more stringent six-year requirement.

(18) **Veneer Dryer**

- A. The Veneer Dryer is licensed to fire propane. [06-096 C.M.R. ch. 115, BPT]
- B. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Veneer Dryer	0.07	0.07	0.07	0.001	0.20	0.12	0.02

C. Visible Emissions

Visible emissions from the Veneer Dryer stack shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(3)]

(19) **Paint Spray Booth [06-096 C.M.R. ch. 115, BPT]**

- A. The particulate filters shall be inspected monthly and replaced as required. All corrective or preventative maintenance performed on the particulate filters shall be documented in a maintenance log and made available to the Department upon request.
- B. VOC emissions from coatings sprayed in the Paint Spray Booth shall not exceed 1.0 tons per year based on a calendar year total basis.
- C. Record and maintain records of the types and quantities of coatings used in the Paint Spray Booth and the VOC content of each and any other relevant information.

- D. Calculate monthly VOC emissions from the Paint Spray Booth using the following mass balance equations for VOC-containing coatings:

$$\text{Monthly VOC Emissions} = \sum_{i=1}^n (A \times \text{VOC content})$$

Where:

i = Each VOC containing coating used at the facility during the month.

n = The number of VOC-containing coatings used in the Paint Spray Booth during the month.

A = Monthly purchases of VOC-containing coatings.

- E. Visible emissions from the Paint Spray Booth shall not exceed 5% opacity on a six-minute block average basis.

**(20) Wood Waste and Byproducts Handling Equipment**

- A. Cousineau shall operate the dust collector to control PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the Sawdust and Wood Waste Blower System. The dust collector shall have a design PM/PM<sub>10</sub>/PM<sub>2.5</sub> control efficiency of 99.9%. The dust collector shall be checked weekly and emptied when full. All corrective or preventative maintenance performed on the dust collector shall be documented in a maintenance log and made available to the Department upon request. [06-096 C.M.R. ch. 115, BPT]
- B. Cousineau shall operate the cyclone separator to control PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the Bagger Silo. The central cyclone separator empties the dust into a hopper which is checked weekly and emptied when full or near full. The other stand-alone cyclone separators use bags to collect the dust. These bags, which are located next to the operator, shall be monitored during operation and emptied when full. All corrective or preventative maintenance performed on the cyclone separator shall be documented in a maintenance log and made available to the Department upon request. [06-096 C.M.R. ch. 115, BPT]

C. Visible Emissions

1. Visible Emissions from the Sawdust and Wood Waste Blower System shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(3)]
2. Visible emissions from the Bagger Silo shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

(21) **Finger Jointing Process**

- A. Cousineau shall not exceed 0.1 tons per year of VOC emissions from the finger jointing process based on a calendar year total. [06-096 C.M.R. ch. 115, BPT]
- B. Cousineau shall record and maintain records of the types and quantities of glues and adhesives used in the Finger Jointing Process and the VOC content of each, and any other applicable information. [06-096 C.M.R. ch. 115, BPT]
- C. Calculate monthly VOC emissions using the following mass balance equations for the applicable:

$$\text{Monthly VOC Emissions} = \sum_{i=1}^n (A \times \text{VOC content})$$

Where:

i = Each VOC containing material used at the facility during the month.

n = The number of VOC-containing materials used at the facility during the month.

A = Monthly facility purchases of VOC-containing materials.

[06-096 C.M.R. ch. 115, BPT]

- D. Visible emissions from the Finger Jointing Process shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

(22) **Veneer Laminating Line [06-096 C.M.R. ch. 115, BPT]**

- A. Cousineau shall be limited to 5.0 tons per year of non-combustion VOC emissions from the Veneer Laminating Line on a calendar year total basis.
- B. Cousineau shall record and maintain records of the types and quantities of glues used in the Veneer Laminating Line and the VOC content of each, and any other applicable information.
- C. Calculate monthly VOC emissions using the following mass balance equations for the applicable:

$$\text{Monthly VOC Emissions} = \sum_{i=1}^n (A \times \text{VOC content})$$

Where:

i = Each VOC containing material used at the facility during the month.

n = The number of VOC-containing materials used at the facility during the month.

A = Monthly facility purchases of VOC-containing materials.

- D. Visible emissions from the Veneer Laminating Line shall not exceed 5% opacity on a six-minute block average basis.

(23) **DymaLux Line**

- A. Cousineau shall be limited to 1.1 tons per year of VOC emissions from the DymaLux Line on a calendar year total basis. [06-096 C.M.R. ch. 115, BPT]
- B. Cousineau shall record and maintain records of the types and quantities of resins used in the DymaLux Line and the VOC content of each, and any other applicable information. [06-096 C.M.R. ch. 115, BPT]

- C. Calculate monthly VOC emissions using the following mass balance equations for the applicable:

$$\text{Monthly VOC Emissions} = \sum_{i=1}^n (A \times \text{VOC content})$$

Where:

i = Each VOC containing material used at the facility during the month.

n = The number of VOC-containing materials used at the facility during the month.

A = Monthly facility purchases of VOC-containing materials.

[06-096 C.M.R. ch. 115, BPT]

- D. Visible emissions from the DymaLux Line shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

(24) **UV #1 Line**

- A. Cousineau shall be limited to 0.2 tons per year of VOC emissions from the UV #1 Line on a calendar year total basis. [06-096 C.M.R. ch. 115, BPT]
- B. Cousineau shall record and maintain records of the types and quantities of wood sealer and coating material used in the UV #1 Line and the VOC content of each, and any other applicable information. [06-096 C.M.R. ch. 115, BPT]
- C. Calculate monthly VOC emissions using the following mass balance equations for the applicable:

$$\text{Monthly VOC Emissions} = \sum_{i=1}^n (A \times \text{VOC content})$$

Where:

i = Each VOC containing material used at the facility during the month.

n = The number of VOC-containing materials used at the facility during the month.

A = Monthly facility purchases of VOC-containing materials.

[06-096 C.M.R. ch. 115, BPT]

- D. Visible emissions from the UV #1 Line shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

(25) **Process HAP Emissions [06-096 C.M.R. ch. 115, BPT]**

- A. Cousineau shall not exceed a facility limit of 7.9 tons per year of any single HAP or 19.9 tons per year of total combined HAPs on a calendar year total basis. This shall include HAP emissions from the Finger Jointing Process, the Veneer Laminating Line, the DymaLux Line.
- B. Cousineau shall track HAP emissions by doing the following:
1. Record and maintain records of the types and quantities of materials purchased at the facility and the VOC and HAP content of each, and any other applicable information.
  2. Calculate monthly HAP emissions using the following mass balance equations for the applicable materials purchased at the facility:

$$\text{Monthly HAP Emissions} = \sum_{i=1}^n (A \times \text{HAP content})$$

Where:

i = Each HAP containing material used at the facility during the month.

n = The number of HAP containing materials used at the facility during the month.

A = Monthly facility purchases of HAP-containing materials.

(26) **General Process Sources**

- A. Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]
- B. Visible emissions from any baghouse shall not exceed 10% on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(3)]

(27) **Fugitive Emissions**

- A. Cousineau shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such

**Cousineau Wood Products of Maine,  
LLC  
Somerset County  
North Anson, Maine  
A-103-71-P-R/M**

32

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

reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.

- B. Cousineau shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22.

[06-096 C.M.R. ch. 101, § 4(C)]

- (28) If the Department determines that any parameter value pertaining to construction and operation of the emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, Cousineau may be required to submit additional information. Upon written request from the Department, Cousineau shall provide information necessary to demonstrate AAQS will not be exceeded, potentially including submission of an ambient air quality impact analysis or an application to amend this air emission license to resolve any deficiencies and ensure compliance with AAQS. Submission of this information is due within 60 days of the Department's written request unless otherwise stated in the Department's letter.

[06-096 C.M.R. ch. 115, § 2(O)]

DONE AND DATED IN AUGUSTA, MAINE THIS 31<sup>st</sup> DAY OF DECEMBER, 2024.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for  
MELANIE LOYZIM, COMMISSIONER

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

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: September 10, 2024

Date of application acceptance: September 10, 2024

This Order prepared by Kendra Nash, Bureau of Air Quality.