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

Robbins Lumber East Baldwin, LLC	**|**	**Departmental**
Cumberland County	**|**	**Findings of Fact and Order**
East Baldwin, Maine	**|**	**Air Emission License**
A-714-71-K-A	**|**	**After-the-Fact Amendment**

Findings of Fact

After review of the air emission license 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

Robbins Lumber East Baldwin, LLC (Robbins) was issued Air Emission License A-714-71-J-R/A on June 21, 2023, for the operation of emission sources associated with their white pine lumber production facility. The license was subsequently amended on 3/30/2026 (A-714-71-K-A) to add Generator #2, which is used to power their oversized log debarker

The equipment addressed in this license amendment is located at 411 Pequawket Trail, Route 113, East Baldwin, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license amendment:

Stationary Engine

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (kW)	Fuel Type	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.
Generator #2	1.25	113	Distillate Fuel	9.01	1995	2025

C. Definitions

Distillate Fuel means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;

- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

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.

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the "Significant Emissions" levels as defined in the Department's *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100. The emission increases are determined by subtracting the current licensed annual emissions preceding the modification from the maximum future licensed annual emissions, as follows:

Pollutant	Current License (tpy)	Future License (tpy)	Net Change (tpy)	Significant Emissions Levels
PM	20.6	20.7	+0.1	100
PM_{10}	17.8	17.9	+0.1	100
$PM_{2.5}$	12.3	12.4	+0.1	100
SO_2	1.7	1.7	--	100
NO_x	20.6	22.8	+2.2	100
CO	42.0	42.5	+0.5	100
VOC	35.1	35.3	+0.2	100

This modification is determined to be a minor modification and has been processed as such.

E. Facility Classification

With the annual throughput limit on the drying kilns, and the operating hours restriction on the generators, the facility is licensed as follows:

- As a synthetic minor source of air emissions for criteria pollutants, because Robbins is subject to license restrictions that keep facility emissions below major source thresholds for NO_X and 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 new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

B. Generator #2

Robbins operates Generator #2 to power their oversized log debarker. Generator #2 has an engine rated at 1.25 MMBtu/hr, fires distillate fuel, and was manufactured in 1995. Robbins estimates that the log debarker and generator are in use for approximately 2 hours per week and has proposed an operating limit on Generator #2 of 800 hr/yr.

1. BACT Findings

The BACT emission limits for Generator #2 are based on the following:

$PM/PM_{10}/PM_{2.5}$	–	0.12 lb/MMBtu based on 06-096 C.M.R. ch. 115, BACT
SO_2	–	Combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
NO_x	–	4.41 lb/MMBtu from AP-42 Table 3.3-1dated 4/25
CO	–	0.95 lb/MMBtu from AP-42 Table 3.3-1 dated 4/25
VOC	–	0.36 lb/MMBtu from AP-42 Table 3.3-1 dated 4/25
Visible Emissions	–	06-096 C.M.R. ch. 101

The BACT emission limits for Generator #2 are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #2	0.15	0.15	0.15	--	5.51	1.19	0.45

Generator #2 shall be limited to 800 hours per calendar year of operation for any reason, including startup and shutdown, and testing use. Compliance shall be demonstrated by a written or electronic log of all generator operating hours. [06-096 C.M.R. ch. 115, BPT]

2. Visible Emissions

   Visible emissions from Generator #2 shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time Robbins shall either meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard.

   a. The duration of the startup shall not exceed 30 minutes per event;
   b. Visible emissions shall not exceed 50% opacity on a six-minute block average basis; and
   c. Robbins shall keep records of the date, time, and duration of each startup.

   Use of the work practice standards and alternative visible emissions standard in lieu of the normal operating standard is limited to no more than once per day.

   Note: This does not limit the engine to one startup per day. It only limits the use of the alternative emission standard to once per day.

3. Chapter 169

   Stationary Generators, 06-096 C.M.R. ch. 169 (Chapter 169), is applicable to Generator #2. It is a generator powered by an engine with a rated output of less than 1,000 brake horsepower (747 kW). Chapter 169 identifies emission standards for generator engines subject to this chapter and stack height requirements for certain generator engines subject to this chapter.

   a. <u>Chapter 169 Emission Standards Requirements</u>

      For Generator #2, Robbins shall comply with the emission standards for emergency generators by complying with the applicable standards contained in 40 C.F.R. Part 63, Subpart ZZZZ.
      [06-096 C.M.R. ch. 169, § 4(B)(1)]

   b. <u>Chapter 169 Stack Height Requirements</u>

      Chapter 169 identifies stack height requirements for any stack used to exhaust a generator engine or combination of generator engines with a combined rated output equal to or greater than 1,000 brake horsepower (747 kW). Individual generator engines with a maximum power capacity of less than 300 kW are not included in the assessment of the combined generator power capacity exhausted through a common stack. [06-096 C.M.R. ch. 169, § 6]

There are no stack height requirements in Chapter 169 applicable to Generator #2 because it exhausts through its own stack and its rated output is less than 1,000 brake horsepower (747 kilowatts).
[06-096 C.M.R. ch. 169, § 6]

4. New Source Performance Standards (NSPS)

Due to the date of manufacture of the compression ignition emergency engine listed above, the engine is not subject to the New Source Performance Standards (NSPS) *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE),* 40 C.F.R. Part 60, Subpart IIII since the unit was manufactured prior to April 1, 2006. [40 C.F.R. § 60.4200]

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

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63, Subpart ZZZZ is applicable to Generator #2. The unit is considered existing, stationary reciprocating internal combustion engine at an area HAP source and is not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE*) specifically does not exempt these units from the federal requirements. [40 C.F.R. § 63.6585]

A summary of the currently applicable federal 40 C.F.R. Part 63, Subpart ZZZZ requirements is listed below.

a. Engine Designation and Operating Criteria

Under 40 C.F.R. Part 63, Subpart ZZZZ, a stationary reciprocating internal combustion engine (RICE) is considered a stationary RICE as long as the engine is operated in accordance with the following criteria. Generator #2 is considered a non-emergency engine under 40 C.F.R. Part 63, Subpart ZZZZ.

b. 40 C.F.R. Part 63, Subpart ZZZZ Requirements

(1) Operation and Maintenance Requirements

(i) Robbins shall meet the following operational limitations for the compression ignition emergency engine (Generator #2):

1. Change the oil and filter every 1,000 hours of operation or within 1 year + 30 days of the previous change, whichever comes first;
2. Inspect the air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and
3. Inspect the hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

Records shall be maintained documenting compliance with the operational limitations.

[40 C.F.R. § 63.6603(a) & Table 2(d); 06-096 C.M.R. ch. 115, BPT]

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

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

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 63.6625(f)]

(4) Startup Idle and Startup Time Minimization Requirements
During periods of startup, the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) and 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(5) Recordkeeping
Robbins shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the

non-resettable hour meter. Documentation shall include the number of hours the unit operated for. [40 C.F.R. § 63.6655(f)]

C. 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:

- The biomass fired in Boilers #1 and #4 has an average moisture content of 50% by weight;
- Firing Boilers #1-#4 for 8,760 hours per year each;
- Operating Generator #1 for 100 hr/yr of non-emergency operation;
- Drying 30.0 MMBF/yr of pine in the kilns; and
- Operating Generator #2 for 800 hr/yr.

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_{10}	$PM_{2.5}$	SO_2	NO_x	CO	VOC
Boiler #1	3.8	2.8	1.7	0.3	2.8	7.6	0.2
Boiler #2	2.2	2.2	2.2	--	3.9	1.0	0.1
Boiler #3	1.0	1.0	1.0	--	1.8	0.5	--
Boiler #4	13.6	11.8	7.4	1.4	12.0	32.6	0.9
Generator #1	--	--	--	--	0.1	0.3	--
Kilns	--	--	--	--	--	--	33.9
Generator #2	0.1	0.1	0.1	--	2.2	0.5	0.2
Total TPY	**20.7**	**17.9**	**12.4**	**1.7**	**22.8**	**42.5**	**35.3**

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

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:

Pollutant	Tons/Year
PM_{10}	25
$PM_{2.5}$	15
SO_2	50
NO_x	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 amendment.

This determination is based on information provided by the applicant regarding the expected operation of the proposed 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 Robbins 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 Amendment A-714-71-K-A subject to the conditions found in Air Emission License A-714-71-J-R/A and the following conditions.

Severability. The invalidity or unenforceability of any provision of this License Amendment or part thereof shall not affect the remainder of the provision or any other provisions. This

License Amendment shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

Specific Conditions

The following is a new condition:

(26) **Generator #2**

A. Generator #2 shall be limited to 800 hours per calendar year of operation for any reason, including startup and shutdown, and testing use. A non-resettable hour meter shall be installed and operated on the generator. Compliance with the hour limit shall be demonstrated by a written or electronic log of all generator operating hours. [06-096 C.M.R. ch. 115, BACT]

A. Robbins shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours Generator #2 operated for any reason, and the reason the engine was in operation during each time. [06-096 C.M.R. ch. 115, BACT]

B. The fuel sulfur content for Generator #2 shall be limited to 0.0015% sulfur by weight. Compliance shall be demonstrated by fuel delivery receipts from the supplier, fuel supplier certification, certificate of analysis, or testing of the fuel in the tank on-site. [06-096 C.M.R. ch. 115, BACT]

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

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #2	0.15	0.15	0.15	--	5.51	1.19	0.45

D. Visible Emissions

Visible emissions from Generator #2 shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time Robbins shall either meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard.

1. The duration of the startup shall not exceed 30 minutes per event;
2. Visible emissions shall not exceed 50% opacity on a six-minute block average basis; and
3. Robbins shall keep records of the date, time, and duration of each startup.

Use of the work practice standards and alternative visible emissions standard in lieu of the normal operating standard is limited to no more than once per day.

Note: This does not limit the engine to one startup per day. It only limits the use of the alternative emission standard to once per day.

[06-096 C.M.R. ch. 101, § 4(A)(4)]

E. Generator #2 shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following:
[incorporated under 06-096 C.M.R. ch. 115, BACT]

1. Robbins shall meet the following operational limitations for the stationary compression ignition engine:

   a. Change the oil and filter every 1,000 hours of operation or within 1 year + 30 days of the previous change, whichever comes first;
   b. Inspect the air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and
   c. Inspect the hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

   Records shall be maintained documenting compliance with the operational limitations.

   [40 C.F.R. § 63.6603(a) and Table 2(d); and 06-096 C.M.R. ch. 115]

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

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 63.6625(f)]

4. Operation and Maintenance
   The engine shall be operated and maintained according to the manufacturer's emission-related written instructions, or Robbins shall develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
   [40 C.F.R. § 63.6625(e)]

   Robbins shall have available for review by the Department a copy of the manufacturer's emission-related written instructions for engine operation and maintenance. [06-096 C.M.R. ch. 115, BPT]

5. Startup Idle and Startup Time Minimization
   During periods of startup, the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) & 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

Done and Dated in Augusta, Maine this 16th day of JUNE, 2026.

Department of Environmental Protection

BY:_____
for Melanie Loyzim, Commissioner

The term of this license amendment shall be ten (10) years from the issuance of Air Emission License A-714-71-J-R/A (issued 06/21/2023).

[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: 3/30/2026
Date of application acceptance: 3/30/2026

This Order prepared by Jack Doran, Bureau of Air Quality.