



DEPARTMENT ORDER

**Louisiana-Pacific Corporation  
Aroostook County  
New Limerick, Maine  
A-327-77-10-M**

**Departmental  
Findings of Fact and Order  
New Source Review  
NSR #10**

**FINDINGS OF FACT**

After review of the air emission license 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 (the Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

FACILITY	Louisiana-Pacific Corporation
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Revision
NAICS CODES	321219
NATURE OF BUSINESS	Reconstituted Wood Product Manufacturing
FACILITY LOCATION	240 Station Road, New Limerick, Maine

**B. NSR License Description**

Louisiana-Pacific Corporation (LP) has requested a New Source Review (NSR) license to replace the Line 1 Press RCO/RTO.

**C. Emission Equipment**

The following equipment is addressed in this NSR license:

**Fuel Burning Equipment**

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Fuel Type	Manuf. Date	Install. Date
Line 1 Press RCO/RTO*	11.2	Propane/Natural Gas	1999	1999
Line 1 Press RCO/RTO	12.0	Propane/Natural Gas	2025	2025

\*This licensing action involves replacing the Line 1 Press RCO/RTO with a new unit.

D. Project Description

Emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAP) from LP's Line 1 Press are currently controlled by a combination regenerative catalytic oxidizer (RCO) and regenerative thermal oxidizer (RTO) referred to as the Line 1 Press RCO/RTO. The Line 1 Press RCO/RTO is reaching the end of its useful life. LP proposes to replace the existing unit with a new RCO/RTO that can provide equivalent or better emissions control.

The Line 1 Press RCO/RTO replacement will not result in any increase in either permitted or actual emissions. Although the new unit has a slightly higher maximum heat input, LP has written guarantees from the manufacturer that emissions of each regulated pollutant will be equal to or less than the currently licensed emissions limits, which were established through a Best Available Control Technology (BACT) analysis in air emission license A-327-77-5-A (issued 3/5/2021). The Department finds that the new Line 1 Press RCO/RTO will achieve Best Practical Treatment (BPT) for control of emissions from the Line 1 Press.

E. Application Classification

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

Pursuant to § 2(R) of *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115, replacement of an existing air pollution control system may be considered a minor revision provided the new equipment achieves BPT. As discussed previously, the new Line 1 Press RCO/RTO will achieve BPT. Therefore, this application has been processed as a minor revision in accordance with 06-096 C.M.R. ch. 115.

F. 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.

The only change to this table is a reduction to SO<sub>2</sub> emissions based on the sulfur content of the propane used in the Line 1 Press RCO/RTO.

Maximum potential emissions were calculated based on the following assumptions:

- CHU – TOS operating for 8,760 hr/year at licensed lb/hr limits. VOC converted from “as carbon” to “as propane plus formaldehyde.”;
- Operation of the Dryers for 8,760 hr/year at licensed lb/hr limits. VOC converted from “as carbon” to “as propane plus formaldehyde.”;
- Operation of the LSL Press for 8,550 hr/year at licensed lb/hr limits. VOC converted from “as carbon” to “as propane plus formaldehyde.”;
- Operation of the Line 1 Press for 8,760 hr/year at licensed lb/hr limits. VOC converted from “as carbon” to “as propane plus formaldehyde.”;
- Assumes LSL Press and Line 1 Press lines cannot run simultaneously. The emissions shown in the table below are based on the worst-case operating scenario (Line 1 Press or LSL Press) using licensed emission limits and hours of operation noted here;
- Annual PM and VOC emission limits on the Dry Wafer Storage Bins and LSL Flying Cut-off Saw;
- Annual VOC emission limit on the LSL Edge Seal Process;
- Annual combined VOC emission limit on the Main Line Spray Booth, Primer Finish Line, and Smooth Panel Finishing Line;
- Operation of all finishing line oven burners for 8,760 hr/year at licensed lb/hr limits; and
- Operation of the emergency engines for 100 hr/year.

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 <sup>1</sup>
CHU – TOS Stack	20.1	20.1	20.1	16.7	154.0	154.0	4.3
CHU – Dryer Vent Stack (RTO Stack)	68.3	68.3	68.3	1.9	144.1	477.4	24.0
Dry Wafer Storage Bins	0.5	0.5	0.5	–	–	–	3.1
LSL Flying Cut-off Saw	2.5	2.5	2.5	–	–	–	8.6
LSL Press	–	–	–	–	–	–	32.6
Line 1 Press	53.9	53.9	53.9	1.2	89.8	42.0	–
LSL Edge Seal	–	–	–	–	–	–	1.1
Fire Pump	–	–	–	–	0.3	0.1	–
TOS Backup Pump	–	–	–	–	0.1	–	–
Finishing Line Ovens #1-#4	0.7	0.7	0.7	0.1	4.4	7.2	1.0

	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC <sup>1</sup>
Finishing Line Ovens #5-#6	0.4	0.4	0.4	—	2.8	4.6	0.6
Finishing Line Oven #7	0.2	0.2	0.2	—	1.2	1.9	0.3
Finishing Line Ovens #8-#9	0.6	0.6	0.6	—	3.8	6.2	0.8
Finishing Lines <sup>2</sup>	—	—	—	—	—	—	34.9
<b>Total TPY</b>	<b>147.2</b>	<b>147.2</b>	<b>147.2</b>	<b>19.9</b>	<b>400.5</b>	<b>693.4</b>	<b>111.3</b>

<sup>1</sup> All VOC emissions are listed as propane plus formaldehyde.

<sup>2</sup> Includes the Main Line Spray Booth, Primer Finish Line, and Smooth Panel Finishing Line.

## ORDER

The Department hereby grants New Source Review Minor Revision A-327-77-10-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the specific conditions below.

### SPECIFIC CONDITIONS

**The following shall replace Condition (1)(C)(2) of NSR License A-327-77-5-A (3/5/2021):**  
(Lowers the emission limit for SO<sub>2</sub> based on the actual maximum sulfur content of the fuel.)

**(1) Line 1 Press**

**C. Emission Limits**

(Emission limits are on a 1-hour block average unless otherwise stated.)

2. Emissions from the Line 1 Press shall not exceed the following limits:  
[06-096 C.M.R. ch. 115, BACT]

Controlled by...	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)
RCO	12.30	12.30	12.30	0.26	19.90	9.50	1.75 (as carbon)
RTO	12.30	12.30	12.30	0.26	20.50	9.60	1.75 (as carbon)

The following are new Conditions.

(2) Line 1 Press RCO/RTO

- A. LP is licensed to replace the Line 1 Press RCO/RTO. The new Line 1 Press RCO/RTO shall be subject to all applicable requirements and conditions as the previous unit. [06-096 C.M.R. ch. 115, BPT]
- B. Approval to construct the new Line 1 Press RCO/RTO shall become invalid if the source has not commenced construction within eighteen (18) months after issuance of this license amendment 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]

- (3) 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, LP may be required to submit additional information. Upon written request from the Department, LP 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 10<sup>th</sup> DAY OF JANUARY, 2025.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for  
MELANIE LOYZIM, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 12/11/2024

Date of application acceptance: 12/12/2024

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