

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

#### DEPARTMENT ORDER

Louisiana-Pacific Corporation Aroostook County New Limerick, Maine A-327-70-T-A

Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #4

## FINDINGS OF FACT

After review of the Part 70 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

FACILITY	Louisiana-Pacific Corporation
LICENSE TYPE	Part 70 Significant License Modification
NAICS CODES	321219
NATURE OF BUSINESS	Reconstituted Wood Product Manufacturing
FACILITY LOCATION	240 Station Road, New Limerick, Maine

Louisiana-Pacific Corporation (LP) owns and operates a laminated strand lumber and specialty engineered wood panel production facility located in New Limerick, Maine.

New Source Review (NSR) license A-327-77-9-A (NSR #9), issued 8/8/2024, addressed the manufacture of a new type of specialty engineered wood panel product. The Smooth Panel Line Project involved the installation of a new finishing line to produce panels with a smooth, non-textured surface. LP has requested that the provisions of this NSR license be incorporated into their Part 70 license. The Department will also address any additional applicable requirements associated with the Smooth Panel Line Project.

With this license, the Department is also taking this opportunity to make the following changes:

- 1. Removing equipment that was previously permitted but not installed;
- 2. Correcting the heat input for Finishing Line Oven #4;
- 3. Updating visible emission standards as necessary due to recent changes to 06-096 Code of Maine Rules (C.M.R.) ch. 101, *Visible Emissions Regulation*; and
- 4. Replacement of the Standard Statements and Standard Conditions of the Part 70 License due to recent updates contained in 06-096 C.M.R. ch. 140, *Part 70 Air Emission License Regulations*.

### Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #4

## **B.** Emission Equipment

The following new emissions units are addressed by this Part 70 License:

## **Fuel Burning Equipment**

2

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hr)	Fuel Type, % sulfur	Manf. Date
Finishing Oven #7 (Endo Oven)	5.25	58	Propane, negligible	2024
Finishing Oven #8 (CT Oven #1)	8.75	97	Propane, negligible	2024
Finishing Oven #9 (CT Oven #2)	8.75	97	Propane, negligible	2024

## **Process Equipment**

		Pollution Control
Equipment	Description	Equipment
Smooth Panel	Surface treatments for finished product using a curtain coater and marking systems	None
Finishing Line	Surface treatments for finished product using high-pressure spray guns	Enclosed booths with filters

The following equipment was previously licensed but not installed. Applicable requirements specific to this equipment are being removed.

## **Fuel Burning Equipment**

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hr)	Fuel Type, % sulfur
Specialty Pre-Heat Oven #1	3.15	34.4	Propane, negligible
Specialty Drying Oven #1	3.15	34.4	Propane, negligible
Specialty Drying Oven #2	3.15	34.4	Propane, negligible

Louisiana-Pacific Corporation Aroostook County New Limerick, Maine A-327-70-T-A

### Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #4

## **Process Equipment**

3

Equipment	Description	Pollution Control Equipment
Specialty Finish	Surface treatments for finished product using fan coaters	None
Coating Line	Surface treatments for finished product using high-pressure spray guns	Enclosed booths with filters
Misc. Product Finishing Line	Surface treatments for finished product using high-pressure spray guns	Enclosed booths with filters

The following existing emissions units are also addressed in this Part 70 license amendment:

## **Fuel Burning Equipment**

	Maximum Capacity	Fuel Type,	Manf.
Equipment	(MMBtu/hr)	% sulfur	Date
Press RCO/RTO <sup>a</sup>	11.2	Propane/Natural Gas	1999
Central Heating Unit (CHU)	278	Bark, wood, mill trimmings	2007
Dryer RTO	13.5	Propane/Natural Gas	2007
Fire Pump	1.2	Distillate fuel	1981
TOS Backup Pump	0.3	Distillate fuel	2007
Emergency Dryer Drum Engine #1	0.04	Propane	2004
Emergency Dryer Drum Engine #2	0.04	Propane	2004
Finishing Line Oven #1	5.0	Propane, negligible	2021
Finishing Line Oven #2	5.0	Propane, negligible	2021
Finishing Line Oven #3	5.0	Propane, negligible	2021
Finishing Line Oven #4 <sup>b</sup>	5.0	Propane, negligible	2021
Finishing Line Oven #5	6.35	Propane, negligible	2021
Finishing Line Oven #6	6.35	Propane, negligible	2021

<sup>a</sup> Combined regenerative catalytic oxidizer (RCO) and regenerative thermal oxidizer (RTO)

<sup>b</sup> Corrected from the previously licensed 6.35 MMBtu/hr. Emission limits for this oven have been recalculated based on the previously established Best Available Control Technology emission rates.

Louisiana-Pacific Corporation Aroostook County New Limerick, Maine A-327-70-T-A

## **Process Equipment**

4

Equipment	Description	Pollution Control Equipment
Dryers (2)	Uses exhaust gases from CHU to dry strands/wafers at a max rate of 15.25 Oven Dried Ton (ODT)/hr	Wet ESP & RTO
Dry Wafer Storage Bins (2)	Dry strand/wafer storage	Baghouse
OSB/LSL Flying Cutoff Saws	Cut the mats to length before they enter the presses	Baghouse
Thermal Oil System	Provides heat for the OSB Press, LSL Press steam generator, buildings, and log ponds	Multiclone & Dry ESP
Line 1 Press Uses heat from thermal oil and pressure to bind wafers together		RCO/RTO
LSL Press Uses steam and pressure to bind strands together		N/A
Pneumatic Systems	Transfers material around the facility	Baghouses
LSL Edge Seal & OSB Spray Booths	Surface treatments for finished product	N/A

#### C. Definitions

<u>Records</u> or <u>Logs</u> 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 issued date of this license.

LP has requested incorporation into the Part 70 Air License the relevant terms and conditions of NSR license A-327-77-9-A issued 8/8/2024 pursuant to *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115. Therefore, this license application was considered a Part 70 Significant License Modification and processed under *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140. The NSR license addressed Best Available Control Technology analysis for new equipment.

Therefore, this license application was considered a Part 70 Significant License Modification and processed under *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

## E. Project Description

LP produces textured siding panels that have a cedar-like appearance. In NSR #9, LP proposed to also manufacture a panel product with a smooth or brushstroke appearance.

The change in the panel's appearance is created by swapping out textured plates in the existing Line 1 Press with smooth plates.

5

The smooth panels exit the Line 1 Press and are cut to length using the existing saw line. From there, the panels are transferred via forklift to a new finishing line (Smooth Panel Finishing Line). The new Smooth Panel Finishing Line consists of conveyors and stackers, a curtain coater, drying ovens, a horizontal cooler and cooling tower, an edge primer spray booth, marking systems, and stacking, strapping and packaging equipment. The new equipment is housed in the finishing building and installed adjacent to the Lap/Trim Finishing lines.

Panels proceed through a curtain coater where they are coated with an eggshell primer. The freshly coated panels are then conveyed through an endothermic oven (Finishing Oven #7) and then through one of two parallel cross-transfer ovens (Finishing Ovens #8 and #9) for additional drying. All finishing ovens fire propane. The panels are then conveyed through a spray booth where primer is sprayed onto the exposed edges of the panels. The finished panels are graded, marked, stacked, and packaged for shipment.



#### II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

#### 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 as well as for those sources located in designated non-attainment areas.

6

BPT for new sources and modifications is based on the demonstration contained in the underlying NSR license 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. BACT for the Smooth Panel Line Project was addressed in NSR #9 and explained in further detail below.

#### **B.** Smooth Panel Finishing Line

This section addresses emissions of particulate matter, VOC, and HAP from the coating operations on the proposed Smooth Panel Finishing Line. Emission requirements for the ovens associated with this finishing line are addressed later in this document.

The Smooth Panel Finishing Line uses a curtain (flow) coater to apply an eggshell primer to the smooth board. An edge primer is applied using a high-pressure spray coating booth. Various marking systems apply small amounts of paint and ink.

- 1. BACT Findings
  - a. Particulate Matter (PM, PM<sub>10</sub>, and PM<sub>2.5</sub>)

The curtain coating processes uses a metal box to transfer primer from a liquid bath to the product being coated. This type of coating does not generate emissions of particulate matter.

Primer will also be applied using either an automatic or manual spray paint booth. The paint booth is enclosed and equipped with particulate filters. This is considered a highly effective control method for particulate matter from spray painting operations.

The Department found the use of particulate filters and the visible emission limit listed below to represent BACT for particulate matter emissions (PM,  $PM_{10}$ , and  $PM_{2.5}$ ) from the Smooth Panel Finishing Line.

Visible emissions from any finishing line spray booth which vents outside shall not exceed 10% opacity on a 6-minute block average basis. LP shall demonstrate compliance with the visible emission limit through performance testing upon request of the Department.

LP shall keep records of the dates the particulate filters are replaced on the Smooth Panel Finishing Line spray booth.

b. Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

7

Emissions of VOC and HAP from the Smooth Panel Finishing Line are directly proportional to the VOC/HAP content of the products applied. Finishing lines are subject to state and federal regulations limiting the amount of VOC and HAP in the coatings.

*Surface Coating Facilities*, 06-096 C.M.R. ch. 129, contains applicable limits for the VOC content of the coatings applied along with work practice standards for the minimization of VOC emissions.

National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 C.F.R. Part 63, Subpart DDDD, contains applicable limits for the HAP content of the coatings applied.

All of the products used are considered to have a low VOC/HAP content. The existing finishing equipment is subject to an emission limit of 34.9 tpy on a 12-month rolling total basis. LP proposed to include emissions from the new Smooth Panel Finishing Line in this existing annual limit.

The Department found an annual VOC limit of 34.9 tpy on a 12-month rolling total basis for the Main Line Spray Booth, Primer Finish Line, and Smooth Panel Finishing Line combined and compliance with the most current versions of 06-096 C.M.R. ch. 129 and 40 C.F.R. Part 63, Subpart DDDD to represent BACT for VOC and HAP emissions for the Smooth Panel Finishing Line.

2. Periodic Monitoring

The following periodic monitoring is required for the Main Line Spray Booth, Primer Finish Line, and Smooth Panel Finishing Line pursuant to NSR #9. Additional periodic monitoring for reasons other than NSR are addressed in LP's existing Part 70 license (A-327-70-O-R issued 9/24/2019) as well as the requirements described below.

- a. Dates the particulate filters are replaced on the spray booth; and
- b. Monthly calculations of VOC use for the Main Line Spray Booth, Primer Finish Line, and Smooth Panel Finishing Line.

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

The Smooth Panel Finishing Line is subject to *Surface Coating Facilities*, 06-096 C.M.R. ch. 129 under the category of "surface coating of flatwood paneling." The definition of "flatwood paneling coating line" includes coating lines which apply and dry or cure coatings to exterior siding.

8

a. Emission Limitations

Actual VOC emissions from the facility's finishing lines are expected to exceed 2.7 tpy. As such, the emission limitations in Section 4 of 06-096 C.M.R. ch. 129 are applicable. LP has elected to comply with Control Option 1, use of low-solvent content coatings.

LP is limited to using coatings with a VOC content equal to or less than 2.1 lb VOC per gallon of coating (excluding water and exempt compounds), as applied and 2.9 lb VOC per gallon of solids, as applied. [06-096 C.M.R. ch. 129, § 4(E)] "Exempt compounds" are those specifically defined as not being a VOC per the definition of VOC in 06-096 C.M.R. ch. 100.

b. Handling, Storage, and Disposal of Materials Containing VOC

LP is subject to the work practice standards contained in Section 5 of 06-096 C.M.R. ch. 129. These requirements include:

- (1) Vapor-tight containers shall be used for the storage of spent or fresh VOC [containing materials] and for the storage or disposal of cloth or paper impregnated with VOC that are used for surface preparation, clean up, or coating removal.
- (2) Cleanup Operations
  - (i) The use of VOC [containing materials] is prohibited for cleanup operations unless equipment (e.g., a closed container) is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.
  - (ii) LP shall collect all organic solvent used to clean spray guns into a container that remains closed except when material is being added or removed.
  - (iii)LP shall pump or drain all organic solvent used for line cleaning into a normally closed container.
  - (iv)LP shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyers, continuous coaters and their enclosures, and/or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is

being replaced, LP may not use more than 1.0 gallon of organic solvent to prepare the booth prior to applying the booth coating.

(v) LP shall control emissions from washoff operations by:

9

- 1. Using normally closed tanks for washoff; and
- 2. Minimizing dripping by tilting or rotating the part to drain as much organic solvent as possible.
- c. Recordkeeping and Reporting
  - (1) LP shall submit to the Department an initial compliance certification upon startup of each new coating unit, line, or operation.
     [06-096 C.M.R. ch. 129 § 7(A)]

The initial certification shall contain the following information:

- (i) Name and location of the facility;
- (ii) Name, address, and telephone number of the facility's Responsible Official;
- (iii)Identification of each coating used on each coating line;
- (iv)The mass of VOC per volume of each coating (e.g., lb VOC/gal), excluding water and exempt compounds, as applied, expected to be used each day on each on each coating line; and
- (v) The time at which the facility's "day" begins if a time other than midnight is used to define a "day."
- [06-096 C.M.R. ch. 129, § 7(A)(2)]
- (2) LP shall keep records of the following:
  - (i) Name and identification of each coating; and
  - (ii) Mass of VOC per volume (e.g., lb VOC/gal), excluding water and exempt compounds, as applied used each month.
  - [06-096 C.M.R. ch. 129, § 7(B)(2)]
- (3) LP shall notify the Department in writing within thirty (30) calendar days of the use of any coatings that do not meet the VOC content limit.
  [06-096 C.M.R. ch. 129, § 8(B)(2)]
- 4. Architectural and Industrial Maintenance (AIM) Coatings, 06-096 C.M.R. ch. 151

The Smooth Panel Line Project does not make LP subject to *Architectural and Industrial Maintenance (AIM) Coatings*, 06-096 C.M.R. ch.151. This regulation applies to the manufacture, sale, and application of architectural coatings. Architectural coating is defined as follows:

"Architectural coating" means a coating to be applied to stationary structures and their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Coatings applied in shop applications or to non-stationary structures such as airplanes, ships, boats, railcars, and automobiles, and adhesives are not considered architectural coatings for the purposes of this rule.

10

LP does not apply coatings to stationary structures or portable buildings at the site of installation.

5. National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, 40 C.F.R. Part 63, Subpart QQQQ

National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, 40 C.F.R. Part 63, Subpart QQQQ, is not applicable to the Smooth Panel Finishing Line. This equipment is in the subcategory "exterior siding and primed doorskins."

The affected source is a collection of all coating operations and equipment (both automatic and manual) and storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed. [40 C.F.R. § 63.4682(b)]

This regulation does <u>not</u> apply to the application of edge seals, primers, and other markings such as logos and grade stamps. [40 C.F.R. § 63.4681(c)(1)] LP does not conduct any surface coating on the Smooth Panel Finishing Line except as exempted under this section. Therefore, the Smooth Panel Finishing Line is not subject to 40 C.F.R. Part 63, Subpart QQQQ.

Air Emission License A-327-70-P-A (issued 12/14/2021) stated that the Specialty Finish Coating Line and the Miscellaneous Product Finishing Line were subject to 40 C.F.R. Part 63, Subpart QQQQ, based on the assumption that non-exempt adhesives, caulks, and coatings would be applied to products on those lines. Those processes were never installed. Therefore, none of the fishing lines at LP are subject to 40 C.F.R. Part 63, Subpart QQQQ.

6. National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 C.F.R. Part 63, Subpart DDDD

LP is subject to *National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products*, 40 C.F.R. Part 63, Subpart DDDD. LP is a plywood and composite wood products manufacturing facility which is a major source of HAP. The affected source under Subpart DDDD includes, but is not limited to finishing operations.

Spray booths used to apply edge seal and primer meet the definition of "group 1 miscellaneous coating operations."

The Finishing Line Spray Booths shall use only non-HAP coatings. [40 C.F.R. § 63.2241(a) and Table 3]

Non-HAP coatings are defined as coatings with HAP contents below 0.1% by mass for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 C.F.R. § 1910.1200(d)(4) and below 1.0% by mass for other HAP compounds.

## C. Finishing Line Ovens

All products processed through the Smooth Panel Finishing Line pass through Finishing Oven #7 (Endo Oven) that has propane burners totaling 5.25 MMBtu/hr. The line then splits into two lanes in parallel. Each lane has a CT Oven (Finishing Line Oven #8 and Finishing Line Oven #9). The CT Ovens each have propane burners totaling 8.75 MMBtu/hr.

All of the Finishing Line Ovens are designed to fire propane and are referred to collectively as finishing ovens.

1. BACT Findings

Following is a summary of the BACT analysis for control of emissions from the finishing ovens.

a. Particulate Matter (PM, PM<sub>10</sub>, PM<sub>2.5</sub>)

LP burns only a low-ash content fuel (propane) in the finishing ovens. Additional add-on pollution controls are not economically feasible.

The Department found that BACT for  $PM/PM_{10}/PM_{2.5}$  emissions from the finishing ovens was the use of propane as a fuel and the emission limits listed in the table below.

b. Sulfur Dioxide (SO<sub>2</sub>)

LP fires only propane, an inherently low-sulfur fuel. The use of this fuel results in minimal emissions of  $SO_2$ , and additional add-on pollution controls are not economically feasible.

The Department found that BACT for  $SO_2$  emissions from the finishing ovens was the use of propane. Emissions of  $SO_2$  from these units were determined to be negligible.

c. Nitrogen Oxides (NO<sub>x</sub>)

The finishing line ovens are all equipped with low-NO<sub>x</sub> burners (LNBs) which minimize the formation of NO<sub>x</sub> by improving fuel/air mixing. The use of add-on control technologies for propane-fired units of such a small size is not economically feasible.

12

The Department found that BACT for  $NO_x$  emissions from the finishing ovens was the use of propane, LNBs, and the emission limits listed in the table below.

d. Carbon Monoxide (CO) and Volatile Organic Compounds (VOC)

Emissions of CO and VOC can be reduced by using oxidation catalysts or thermal oxidizers. Oxidation catalysts and thermal oxidizers both have high capital, maintenance, and operational costs considering the size of the emission unit in question. These controls were determined to not be economically feasible.

The Department found that BACT for CO and VOC emissions from the finishing ovens is the use of propane and the emission limits listed in the table below.

e. Emission Limits

The BACT emission limits for the finishing ovens were based on the following:

PM/PM10/PM2.5	_	0.7 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
NO <sub>x</sub>	_	0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BACT
		and manufacturer's specifications
CO	_	7.5 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
VOC	_	1.0 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
Visible Emissions	—	06-096 C.M.R. ch. 115, BACT

The BACT emission limits for the finishing ovens are the following:

Unit	Pollutant	lb/MMBtu
Finishing Line	PM	0.008
Ovens # / - #9 (each)		

Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Finishing Line Ovens #7	0.04	0.04	0.04	0.26	0.43	0.06
Finishing Line Ovens #8 - #9 (each)	0.07	0.07	0.07	0.44	0.72	0.10

LP shall demonstrate compliance with the emission limits above through performance testing upon request of the Department.

2. Visible Emissions

Visible emissions from each of the finishing ovens shall not exceed 10% opacity on a six-minute block average basis.

LP shall demonstrate compliance with the visible emissions limit through performance testing upon request of the Department.

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

Due to their size and not being "steam generating units," the finishing ovens are 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 DDDDD

The finishing ovens do not meet the definition of either *boiler* or *process heater* in 40 C.F.R. § 63.7575 since they are direct-fired heating sources where the combustion gases come into direct contact with the process materials. Therefore, the finishing ovens are not subject to *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, 40 C.F.R. Part 63, Subpart DDDDD.

## **D.** Visible Emissions

In 2023, the Department completed rulemaking on revisions to *Visible Emissions Regulation*, 06-096 C.M.R. ch. 101. The revised rule went into effect on January 1, 2024. The following section identifies applicable visible emissions requirements and addresses necessary revisions to applicable requirements due to this rulemaking.

1. Stack #1 (CHU-TOS)

The exhaust from the CHU is split into two distinct streams. One stream (CHU-Dryers) provides direct contact heating for the two Rotary Dryers, and the other stream (CHU-TOS) passes through a heat exchanger to heat oil for the thermal oil system. The CHU-TOS exhaust stream is sent to a multiclone followed by a dry electrostatic precipitator (ESP) for control of particulate matter emissions. Emissions then exhaust through Stack #1.

Stack #1 is subject to a visible emissions standard of 10% opacity or the highest hourly average opacity reading measured during the most recent successful performance test demonstrating compliance with the PM emission limit. Therefore, Stack #1 is exempt from 06-096 C.M.R. ch. 101 pursuant to 1(C)(7).

14

2. Stack #2 (CHU-Dryers)

The CHU – Dryers exhaust stream passes through the Rotary Dryers and is sent through each dryer's centrifugal cyclone where the wafers, strands, and fines are separated from the exhaust gases. A portion of the exhaust gases from each cyclone is recirculated back to the dryers' inlet or to the CHU.

After the cyclones, the exhaust gas that is not recirculated is sent to a single wet electrostatic precipitator (WESP) for control of PM emissions before being routed through a regenerative thermal oxidizer, referred to as the Dryer RTO, for control of CO, VOC, and HAP emissions. Emissions exhaust through Stack #2.

a. 06-096 C.M.R. ch. 101

On January 1, 2024, the applicable visible emissions standard for Stack #2 contained in 06-096 C.M.R. ch. 101 changed to the following:

Visible emissions from Stack #2 shall not exceed 30% opacity on a 6-minute block average basis, except for periods of startup, shutdown, malfunction, or RTO bake-out.

During periods of startup, shutdown, or malfunction, visible emissions from Stack #2 shall not exceed 40% opacity on a 6-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive 6-minute block averages) per event. LP shall keep records sufficient to document the date, time, and duration of each event.

During periods of RTO bake-out, LP must meet either the applicable normal operating visible emissions standard above (i.e., 30% opacity on a 6-minute block average basis) or the following work practice standards:

- (1) LP shall keep records sufficient to document the date, time, and duration of each event;
- (2) Bake-out events (where work practice standards are utilized) shall not occur more frequently than six times per calendar year;
- (3) Once the RTO chamber is at temperature for bake-out to begin, the duration of each bake-out event shall not exceed three hours; and

(4) During the bake-out event, visible emissions shall not exceed 60 % opacity on a 6- minute block average basis.

15

[06-096 C.M.R. ch. 101, §§ 4(A)(8) and 5(A)]

b. 06-096 C.M.R. ch. 140, BPT

In Air Emission License A-327-70-O-R (9/24/2019), the Department established the following visible emission standards for Stack #2.

Visible emissions from Stack #2 shall not exceed 20% opacity on a 6-minute block average basis except for periods of startup, shutdown, malfunction, or approved maintenance.

During the bake-out process, visible emissions from Stack #2 shall not exceed 30% opacity on a 6-minute block average basis except for 30 minutes during which time visible emissions shall not exceed 70% opacity. Each bake-out warm-up process shall not exceed 4 hours.

Because this visible emission standard was established pursuant to the Department's authority under BPT and is not linked to a federal applicable requirement, such as New Source Review, the Department is taking this opportunity to reestablish BPT as follows:

Visible emissions from Stack #2 shall not exceed 20% opacity on a 6-minute block average basis, except for periods of startup, shutdown, malfunction, or RTO bake-out.

During periods of startup, shutdown, or malfunction, visible emissions from Stack #2 shall not exceed 40% opacity on a 6-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive 6-minute block averages) per event. LP shall keep records sufficient to document the date, time, and duration of each event.

During periods of RTO bake-out, LP must meet either the applicable normal operating visible emissions standard above (i.e., 20% opacity on a 6-minute block average basis) or the following work practice standards:

- (1) LP shall keep records sufficient to document the date, time, and duration of each event;
- (2) Bake-out events (where work practice standards are utilized) shall not occur more frequently than six times per calendar year;

(3) Once the RTO chamber is at temperature for bake-out to begin, the duration of each bake-out event shall not exceed three hours; and

16

(4) During the bake-out event, visible emissions shall not exceed 60% opacity on a 6-minute block average basis.

The new BPT standard is considered more stringent than the previous standard because it no longer allows any periods of unlimited opacity.

c. Streamlining

The Department has determined that the new BPT visible emissions standard is more stringent than all other applicable standards. Therefore, the visible emissions limits have been streamlined to the more stringent BPT limit, and only this more stringent limit shall be included in the Order of this air emission license. Streamlining the BPT limit with the Federally enforceable limits in 06-096 C.M.R. ch. 101 makes the BPT limit Federally enforceable.

3. Dry Wafer Storage Bins, LSL Flying Cut-off Saw, and Pneumatic Systems

On January 1, 2024, the applicable visible emissions standard for the Dry Water Storage Bins, the LSL Flying Cut-off Saw, and the Pneumatic Systems contained in 06-096 C.M.R. ch. 101 changed to the following:

Visible emissions shall not exceed 10% opacity on a 6-minute block average basis.  $[06-096 \text{ C.M.R. ch. } 101, \S 4(B)(3)]$ 

4. Stack #3 (Line 1 Press)

The Line 1 Press is controlled by an RCO/RTO that exhausts through Stack #3.

a. 06-096 C.M.R. ch. 101

On January 1, 2024, the applicable visible emissions standard for Stack #3 contained in 06-096 C.M.R. ch. 101 changed to the following:

Visible emissions from Stack #3 shall not exceed 30% opacity on a 6-minute block average basis, except for periods of startup, shutdown, malfunction, or RTO/RCO bake-out.

During periods of startup, shutdown, or malfunction, visible emissions from Stack #3 shall not exceed 40% opacity on a 6-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive 6-minute block averages) per event. LP shall keep records sufficient to document the date, time, and duration of each event.

17

During periods of RTO/RCO bake-out, LP must meet either the applicable normal operating visible emissions standard above (i.e., 30% opacity on a 6-minute block average basis) or the following work practice standards:

- (1) LP shall keep records sufficient to document the date, time, and duration of each event;
- (2) Bake-out events (where work practice standards are utilized) shall not occur more frequently than six times per calendar year;
- (3) Once the RTO/RCO chamber is at temperature for bake-out to begin, the duration of each bake-out event shall not exceed three hours; and
- (4) During the bake-out event, visible emissions shall not exceed 60% opacity on a 6-minute block average basis.

[06-096 C.M.R. ch. 101, §§ 4(A)(8) and 5(A)]

b. 06-096 C.M.R. ch. 115, BACT

In Air Emission License A-327-77-5-A (3/5/2021), the Department established the following visible emission standards for Stack #3.

Visible emissions from Stack #3 shall not exceed 20% opacity on a 6-minute block average basis except for periods of startup, shutdown, malfunction, or approved maintenance.

During the bake-out process, visible emissions from Stack #3 shall not exceed 30% opacity on a 6-minute block average basis except for 30 minutes during which time visible emissions shall not exceed 70% opacity. Each bake-out warm-up process shall not exceed 2 hours.

c. 06-096 C.M.R. ch. 140, BPT

With this amendment, the Department is establishing the following new visible emissions standard through BPT:

Visible emissions from Stack #3 shall not exceed 20% opacity on a 6-minute block average basis, except for periods of startup, shutdown, malfunction, or RTO/RCO bake-out.

During periods of startup, shutdown, or malfunction, visible emissions from Stack #3 shall not exceed 40% opacity on a 6-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive 6-minute block averages) per event. LP shall keep records sufficient to document the date, time, and duration of each event.

18

During periods of RTO/RCO bake-out, LP must meet either the applicable normal operating visible emissions standard above (i.e., 20% opacity on a 6-minute block average basis) or the following work practice standards:

- (1) LP shall keep records sufficient to document the date, time, and duration of each event;
- (2) Bake-out events (where work practice standards are utilized) shall not occur more frequently than six times per calendar year;
- (3) Once the RTO/RCO chamber is at temperature for bake-out to begin, the duration of each bake-out event shall not exceed three hours; and
- (4) During the bake-out event, visible emissions shall not exceed 60% opacity on a 6-minute block average basis.

This BPT standard is considered more stringent than the standard established pursuant to 06-096 C.M.R. ch. 115 because it no longer allows any periods of unlimited opacity.

d. Streamlining

The Department has determined that the new BPT visible emissions standard is more stringent than all other applicable standards. Therefore, the visible emissions limits have been streamlined to the more stringent BPT limit, and only this more stringent limit shall be included in the Order of this air emission license. Streamlining the BPT limit with the Federally enforceable limits in 06-096 C.M.R. chs. 101 and 115 makes the BPT limit Federally enforceable.

5. LSL Press

There is no change to the visible emissions standard for the LSL Press, however, this license amendment updates the citation from 06-096 C.M.R. ch. 101,  $\S$  3(B)(4) to 06-096 C.M.R. ch. 101,  $\S$  4(B)(4).

- 6. Finishing Line Spray Booths
  - a. 06-096 C.M.R. ch. 101

On January 1, 2024, the applicable visible emissions standard for Stack #2 contained in 06-096 C.M.R. ch. 101 changed to the following:

19

Visible emissions from any finishing line spray booth which vents outside shall not exceed 20% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

b. 06-096 C.M.R. ch. 115, BACT

In Air Emission License A-327-77-9-A (8/8/2024), the Department established the following visible emission standards for spray booths:

Visible emissions from any finishing line spray booth which vents outside shall not exceed 10% opacity on a 6-minute block average basis.

c. Streamlining

The Department has determined that the BACT visible emissions standard is more stringent than all other applicable standards. Therefore, the visible emissions limits have been streamlined to the more stringent BACT limit, and only this more stringent limit shall be included in the Order of this air emission license.

- 7. Finishing Line Ovens
  - a. 06-096 C.M.R. ch. 101

On January 1, 2024, the applicable visible emissions standard for the Finishing Line Ovens contained in 06-096 C.M.R. ch. 101 changed to the following:

Visible emissions from the Finishing Line Ovens each shall not exceed 30% opacity on a 6-minute block average basis, except for periods of startup, shutdown, or malfunction.

During periods of startup, shutdown, or malfunction, visible emissions from the Finishing Line Ovens shall not exceed 40% opacity on a 6-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive 6-minute block averages) per event. LP shall keep records sufficient to document the date, time, and duration of each event.

b. 06-096 C.M.R. ch. 115, BACT

In Air Emission License A-327-77-5-A (3/5/2021), the Department established the following visible emission standards for the Finishing Line Ovens:

20

Visible emissions from each of the finishing line ovens shall not exceed 10% opacity on a six-minute block average basis.

c. Streamlining

The Department has determined that the BACT visible emissions standard is more stringent than all other applicable standards. Therefore, the visible emissions limits have been streamlined to the more stringent BACT limit, and only this more stringent limit shall be included in the Order of this air emission license.

8. TOS Backup Pump and Dryer Drum Engines #1 and #2

On January 1, 2024, the applicable visible emissions standard for the TOS Backup Pump and Dryer Drum Engines #1 and #2 contained in 06-096 C.M.R. ch. 101 changed to the following:

Visible emissions shall not exceed 20% opacity on a 6-minute block average basis.  $[06-096 \text{ C.M.R. ch. } 101, \S 4(A)(4)]$ 

9. Fire Pump

On January 1, 2024, the applicable visible emissions standard for the Fire Pump contained in 06-096 C.M.R. ch. 101 changed to the following:

Visible emissions from the Fire Pump shall each not exceed an opacity of 20% on a six-minute block average basis, except during periods of startup. During periods of startup, the engine must meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard. Use of the following work practice standards and alternative visible emissions standard in lieu of the normal operating visible emissions standard is limited to no more than once per day per engine.

- 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. LP shall keep records as of the date, time, and duration of each startup event.  $[06-096 \text{ C.M.R. ch. } 101, \S 4(A)(4)]$ 

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.

10. Fugitive Emissions

On January 1, 2024, the applicable visible emissions standard for Fugitive Emissions contained in 06-096 C.M.R. ch. 101 changed to the following:

LP 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.

LP 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)]

11. General Process Sources

There is no change to the visible emissions standard for general process sources, however, this license amendment updates the citation from 06-096 C.M.R. ch. 101, 3(B)(4) to 06-096 C.M.R. ch. 101, 4(B)(4).

## E. Facility 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:

- 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;

22

- 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	<b>PM</b> 10	SO <sub>2</sub>	NOx	СО	VOC <sup>1</sup>
CHU – TOS Stack	20.1	20.1	16.7	154.0	154.0	4.3
CHU – Dryer Vent	68.3	68.3	1.0	144-1	177 1	24.0
Stack (RTO Stack)	08.5	08.5	1.9	144.1	4//.4	24.0
Dry Wafer Storage Bins	0.5	0.5	_	—	_	3.1
LSL Flying Cut-off Saw	2.5	2.5		_	_	8.6
LSL Press		_		_	_	32.6
Line 1 Press	53.9	53.9	6.6	89.8	42.0	_
LSL Edge Seal	_	_	_	-	-	1.1
Fire Pump	—	_	_	0.3	0.1	_
TOS Backup Pump	—	_	_	0.1	_	_
Finishing Line	07	07	0.1	4.4	7.2	1.0
Ovens #1-#4	0.7	0.7	0.1	4.4	1.2	1.0
Finishing Line	0.4	0.4		28	16	0.6
Ovens #5-#6	0.4	0.4	—	2.0	4.0	0.0
Finishing Line Oven #7	0.2	0.2	_	1.2	1.9	0.3
Finishing Line	0.6	0.6		28	62	0.8
Ovens #8-#9	0.0	0.0		5.0	0.2	0.0
Finishing Lines <sup>2</sup>				_	_	34.9
Total TPY	147.2	147.2	25.3	400.5	693.4	111.3

<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.

Louisiana-Pacific Corporation Aroostook County New Limerick, Maine A-327-70-T-A

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

LP 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 (see license A-327-77-1-N, issued on 8/26/2006). An additional ambient air quality analysis is not required for this Part 70 License.

23

#### ORDER

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

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

The Department hereby grants the Part 70 License Amendment A-327-70-T-A pursuant to 06-096 C.M.R. 140 and the preconstruction permitting requirements of *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 and subject to the conditions found in Air Emission License A-327-70-O-R, in amendments A-327-70-P-A, A-327-70-Q-A, A-327-70-R-A, and the following conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 C.M.R. ch. 115 for making such changes and pursuant to the applicable requirements in 06-096 C.M.R. ch. 140.

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

<u>Severability</u>. 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.

Due to recent changes to 06-096 C.M.R. ch. 140, the following shall replace the Standard Statements and Standard Conditions of Air Emission License A-327-70-O-R.

#### STANDARD STATEMENTS

(1) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 140]

(2) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 C.M.R. ch. 140]

24

- (3) 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. 140]
- (4) 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, rule, regulation, or Part 70 license requirement. [06-096 C.M.R. ch. 140]
- (5) Compliance with the conditions of this Part 70 license will 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 alters or affects 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.

## Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #4

The following requirements have been specifically identified as not applicable.

Source	Citation	Description	<b>Basis for Determination</b>
Finishing Lines	06-096 C.M.R.	Architectural and Industrial	LP does not apply coatings to
_	ch. 151	Coatings	stationary structures or
			portable buildings.
Dryer RTO &	40 C.F.R. Part 60,	NSPS for Small Industrial-	These are not "steam
Press RTO/RCO	Subpart Dc	Commercial-Institutional	generating units" as defined in
		Steam Generating Units	40 C.F.R. Part 60, Subpart Dc
MDI Storage	40 C.F.R. Part 60,	NSPS for Volatile Organic	Exempted from applicability
Tank	Subpart Kb	Liquid Storage Vessels	per 10/15/03 Federal Register.
Facility	40 C.F.R. Part 63,	NESHAP for Group I	Facility does not produce
-	Subpart U	Polymers and Resins	Group I polymers and resins.
Facility	40 C.F.R. Part 63,	NESHAP for Epoxy Resins	Facility does not produce
	Subpart W	Production and Non-Nylon	epoxy resins or non-nylon
	Acc.	Polyamides Production	polyamides.
Facility	40 C.F.R. Part 63,	NESHAP for Wood	Facility does not produce
	Subpart JJ	Furniture Manufacturing	wood furniture.
		Operations	
Finishing Lines	40 C.F.R. Part 63,	NESHAP for Surface	Facility does not operate any
-	Subpart QQQQ	Coating of Wood Building	non-exempt processes.
		Products	
Finishing Line	40 C.F.R. Part 63,	NESHAP for Major Sources:	The finishing ovens do not
Ovens	Subpart DDDDD	Industrial, Commercial, and	meet the definition of boiler or
		Institutional Boilers and	process heater.
		Process Heaters	-

# Permit Shield Table

25

[06-096 C.M.R. ch. 140]

- (6) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
  - A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of three 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 06-096 C.M.R. ch. 140;
  - B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans will be deemed to be incorporated into the Part 70 license;
  - C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or

D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

26

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[06-096 C.M.R. ch. 140]

(7) No license revision or amendment is required, under any approved economic incentives, marketable licenses, emissions trading, and other similar programs or processes for changes that are provided for in the Part 70 license. [06-096 C.M.R. ch. 140]

## STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed safe access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (38 M.R.S. § 347-C). [06-096 C.M.R. ch. 140]
- (2) The licensee shall acquire a new or amended air emission license pursuant to 06-096 C.M.R. ch. 115 prior to commencing construction of a modification, unless specifically provided for in 06-096 C.M.R. ch. 140 or 06-096 C.M.R. ch. 115. [06-096 C.M.R. ch. 140]
- (3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 C.M.R. ch. 140] **Enforceable by State-only**
- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to 38 M.R.S. § 353-A.
- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 C.M.R. ch. 140] Enforceable by State-only

Louisiana-Pacific Corporation Aroostook County New Limerick, Maine A-327-70-T-A

## Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #4

(6) 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 years. In addition, the licensee shall retain records of all required monitoring data and support information for a period of at least six years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license. [06-096 C.M.R. ch. 140]

27

- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal, 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 does not stay any condition of the Part 70 license. [06-096 C.M.R. ch. 140]
- (8) In accordance with the Department's Performance Testing Guidance and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:
  - A. Submit to the Department for approval a test protocol at least 30 calendar days prior to the scheduled date of the emissions test, unless the Department agrees to a shorter submission timeframe;
  - B. Perform emissions testing under circumstances representative of the facility's normal process and operating conditions:
    - 1. Within 60 calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring, or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
    - 2. To demonstrate compliance with the applicable emission standards; or
    - 3. Pursuant to any other requirement of this license to perform emissions testing.
  - C. 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
  - D. Submit a written report to the Department within 30 days from date of test completion, unless an extension is granted by the Department.
  - [06-096 C.M.R. ch. 140] Enforceable by State-only

(9) If the results of an emissions test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

28

- A. Within 30 days following receipt of such test results, the licensee shall re-test the noncomplying 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;
- B. The days of violation will be presumed to include the date of the emissions 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 until a demonstration of compliance under normal and representative process and operating conditions is completed.

## [06-096 C.M.R. ch. 140] Enforceable by State-only

- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.
  - A. The licensee shall notify the Department within 48 hours of a violation of any emission standard or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;
  - B. The licensee shall submit a report to the Department on a <u>quarterly basis</u> describing all violations of any emission standard.

Pursuant to 38 M.R.S. § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design, or any other reasonably preventable condition or

preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

C. All other deviations from permit requirements shall be reported to the Department in the facility's semiannual report.

29

[06-096 C.M.R. ch. 140]

- (11) Upon the written request of the Department, the licensee shall establish and maintain such records; make such reports; install, use, and maintain such monitoring equipment; sample such emissions in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe; and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 C.M.R. ch. 140]
- (12) The licensee shall submit semiannual reports of any required periodic monitoring by January 31 and July 31 of each year, or on an equivalent schedule specified in the license. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [06-096 C.M.R. ch. 140]
- (13) The licensee shall submit a compliance certification to the Department and EPA annually by January 31 of each year, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
  - A. The identification of each term or condition of the Part 70 license that is the basis of the certification;
  - B. The compliance status;
  - C. Whether compliance was continuous or intermittent;
  - D. The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
  - E. Such other facts as the Department may require to determine the compliance status of the source.

[06-096 C.M.R. ch. 140]

### SPECIFIC CONDITIONS

#### The following shall replace Condition (16)(C) of Air Emission License A-327-70-O-R.

#### (16) **CHU – Dryers**

- C. Visible Emissions
  - 1. Visible emissions from Stack #2 shall not exceed 20% opacity on a 6-minute block average basis, except for periods of startup, shutdown, malfunction, or RTO bakeout. [06-096 C.M.R. ch. 140, BPT]
  - 2. During periods of startup, shutdown, or malfunction, visible emissions from Stack #2 shall not exceed 40% opacity on a 6-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive 6-minute block averages) per event. LP shall keep records sufficient to document the date, time, and duration of each event. [06-096 C.M.R. ch. 140, BPT]
  - 3. During periods of RTO bake-out, LP must meet either the applicable normal operating visible emissions standard above (i.e., 20% opacity on a 6-minute block average basis) or the following work practice standards:
    - a. LP shall keep records sufficient to document the date, time, and duration of each event;
    - b. Bake-out events (where work practice standards are utilized) shall not occur more frequently than six times per calendar year;
    - c. Once the RTO chamber is at temperature for bake-out to begin, the duration of each bake-out event shall not exceed three hours; and
    - d. During the bake-out event, visible emissions shall not exceed 60% opacity on a 6-minute block average basis.
      [06-096 C.M.R. ch. 140, BPT]
    - [06-096 C.M.R. ch. 140, BP1]
  - LP shall demonstrate compliance with the alternative visible emission limits during RTO bake-out through conducting observations consistent with 40 C.F.R. Part 60, Appendix A, Method 9. Observations shall be started 20 to 30 minutes after the end of the warm-up cycle and shall be conducted for at least 18 minutes. [40 C.F.R. § 70.6(c)(1) and 40 C.F.R. Part 64]
  - 5. Upon request by the Department, LP shall demonstrate compliance with the visible emission limits for Stack #2 through performance testing in accordance with 40 C.F.R. Part 60, Appendix A, Method 9. [40 C.F.R. § 70.6(c)(1)]

### The following shall replace Condition (17)(C) of Air Emission License A-327-70-O-R.

#### (17) **Dry Wafer Storage Bins**

C. Visible emissions from the Dry Wafer Storage Bins shall not exceed 10% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(3)]

31

#### The following shall replace Condition (18)(C) of Air Emission License A-327-70-O-R.

#### (18) LSL Flying Cut-off Saw

C. Visible emissions from LSL Flying Cut-off Saw shall not exceed 10% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(3)]

#### The following shall replace Condition (20)(C) of Air Emission License A-327-70-O-R.

#### (20) LSL Press

C. Visible emissions from the LSL Press shall not exceed 20% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

### The following shall replace Condition (24)(B) of Air Emission License A-327-70-O-R.

## (24) **TOS Backup Pump**

B. Visible emissions from the TOS Backup Pump shall not exceed 20% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(4)]

## The following shall replace Condition (25)(B) of Air Emission License A-327-70-O-R.

#### (25) **Fire Pump and Dryer Drum Engines #1 and #2**

- B. Visible Emissions
  - 1. Visible emissions from Dryer Drum Engines #1 and #2 shall each not exceed 20% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(4)]
  - 2. Visible emissions from the Fire Pump shall each not exceed an opacity of 20% on a six-minute block average basis, except during periods of startup. During periods of startup, the engine must meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard. Use of the following work practice standards and alternative visible emissions standard in lieu of the normal operating visible emissions standard is limited to no more than once per day per engine.

a. The duration of the startup shall not exceed 30 minutes per event;

32

b. Visible emissions shall not exceed 50% opacity on a six-minute block average basis; and

c. LP shall keep records as of the date, time, and duration of each startup event. [06-096 C.M.R. ch. 101, \$ 4(A)(4)]

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

#### The following shall replace Condition (26) of Air Emission License A-327-70-O-R.

#### (26) **Fugitive Emissions**

- A. LP 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.
- B. LP 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)]

#### The following shall replace Condition (27) of Air Emission License A-327-70-O-R.

#### (27) General Process Sources

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

#### The following shall replace Condition (19)(D) of Air Emission License A-327-70-P-A.

#### (19) Line 1 Press

- D. Visible Emissions
  - 1. Visible emissions from Stack #3 shall not exceed 20% opacity on a 6-minute block average basis, except for periods of startup, shutdown, malfunction, or RTO/RCO bake-out. [06-096 C.M.R. ch. 140, BPT]

 During periods of startup, shutdown, or malfunction, visible emissions from Stack #3 shall not exceed 40% opacity on a 6-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive 6-minute block averages) per event. LP shall keep records sufficient to document the date, time, and duration of each event. [06-096 C.M.R. ch. 140, BPT]

33

- 3. During periods of RTO/RCO bake-out, LP must meet either the applicable normal operating visible emissions standard above (i.e., 20% opacity on a 6-minute block average basis) or the following work practice standards:
  - a. LP shall keep records sufficient to document the date, time, and duration of each event;
  - b. Bake-out events (where work practice standards are utilized) shall not occur more frequently than six times per calendar year;
  - c. Once the RTO/RCO chamber is at temperature for bake-out to begin, the duration of each bake-out event shall not exceed three hours; and
  - d. During the bake-out event, visible emissions shall not exceed 60% opacity on a 6-minute block average basis.
    106 096 C M P ch 140 BPT1

[06-096 C.M.R. ch. 140, BPT]

- 4. LP shall demonstrate compliance with the alternative visible emission limits during RTO/RCO bake-out through conducting observations consistent with 40 C.F.R. Part 60, Appendix A, Method 9. Observations shall be started 20 to 30 minutes after the end of the warm-up cycle and shall be conducted for at least 18 minutes. [40 C.F.R. § 70.6(c)(1) and 40 C.F.R. Part 64]
- 5. Upon request by the Department, LP shall demonstrate compliance with the visible emission limits for Stack #3 through performance testing in accordance with 40 C.F.R. Part 60, Appendix A, Method 9. [40 C.F.R. § 70.6(c)(1)]

## The following shall replace Condition (23)(B) of Air Emission License A-327-70-P-A.

## (23) **Pneumatic Systems**

B. Visible emissions from each of the Pneumatic Systems Baghouses shall not exceed 10% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 101, 4(B)(3)]

Louisiana-Pacific Corporation Aroostook County New Limerick, Maine A-327-70-T-A

#### The following shall replace Condition (40) of Air Emission License A-327-70-P-A.

#### (40) **Finishing Lines**

A. Emissions of VOC from the Main Line Spray Booth, Primer Finish Line, and Smooth Panel Finishing Line (combined) shall not exceed 34.9 tpy (12-month rolling total basis). Compliance shall be demonstrated by monthly calculations of VOC use for the Main Line Spray Booth, Primer Finish Line, and Smooth Panel Finishing Line. [06-096 C.M.R. ch. 115, BACT (A-327-77-9-A, 8/8/2024)]

34

- B. Visible emissions from any finishing line spray booth which vents outside shall not exceed 10% opacity on a 6-minute block average basis. Upon request by the Department, LP shall demonstrate compliance with the visible emission limit through performance testing in accordance with 40 C.F.R. Part 60, Appendix A, Method 9. [06-096 C.M.R. ch. 115, BACT (A-327-77-9-A, 8/8/2024)]
- C. LP shall use only non-HAP edge seal and primer coatings. [40 C.F.R. § 63.2241(a) and Table 3]

Non-HAP coatings are defined as coatings with HAP contents below 0.1% by mass for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in section A.6.4 of appendix A to 29 C.F.R. § 1910.1200 and below 1.0% by mass for other HAP compounds.

D. Periodic Monitoring

LP shall operate, record data, and maintain records from the following periodic monitors for the finishing lines:

- 1. Name and identification of each coating used; [06-096 C.M.R. ch. 129, § 7(B)(2)]
- 2. Mass of VOC per volume (e.g., lb VOC/gal), excluding water and exempt compounds, for each coating as applied; [06-096 C.M.R. ch. 129, § 7(B)(2)]
- 3. Documentation that only non-HAP edge seal and primer coatings are used; [40 C.F.R. Part 63, Subpart DDDD]
- 4. Amount of each coating used each month; [06-096 C.M.R. ch. 129, § 7(B)(2)] and
- 5. Dates the particulate filters are replaced on each spray booth; [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

E. Following are applicable requirements of 06-096 C.M.R. ch. 129 for the finishing lines not addressed elsewhere in this Order:

35

1. Emission Standards

LP shall only use coatings with a VOC content equal to or less than 2.1 lb VOC per gallon of coating (excluding water and exempt compounds), as applied and 2.9 lb VOC per gallon of solids, as applied. [06-096 C.M.R. ch. 129, § 4(E)] "Exempt compounds" are those specifically defined as not being a VOC pursuant to the definition of VOC in 06-096 C.M.R. ch. 100.

- 2. Handling, Storage, and Disposal of Materials Containing VOC
  - a. Vapor-tight containers shall be used for the storage of spent or fresh VOC [containing materials] and for the storage or disposal of cloth or paper impregnated with VOC that are used for surface preparation, clean up, or coating removal.
     IOE ODE C M P. ch. 120, 8 5 (A)]

[06-096 C.M.R. ch. 129, § 5(A)]

- b. Cleanup Operations
  - (1) The use of VOC [containing materials] is prohibited for cleanup operations unless equipment (e.g., a closed container) is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.
  - (2) LP shall collect all organic solvent used to clean spray guns into a container that remains closed except when material is being added or removed.
  - (3) LP shall pump or drain all organic solvent used for line cleaning into a normally closed container.
  - (4) LP shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyers, continuous coaters and their enclosures, and/or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, LP may not use more than 1.0 gallon of organic solvent to prepare the booth prior to applying the booth coating.
  - (5) LP shall control emissions from washoff operations by:
    - (i) Using normally closed tanks for washoff; and
    - (ii) Minimizing dripping by tilting or rotating the part to drain as much organic solvent as possible.

[06-096 C.M.R. ch. 129, § 5(B)]

36

## 3. Reporting

- a. LP shall submit to the Department an initial compliance certification upon startup of each new coating unit, line, or operation.
   [06-096 C.M.R. ch. 129, § 7(A)]
- b. The initial certification shall contain the following information:
  - (1) Name and location of the facility;
  - (2) Name, address, and telephone number of the facility's Responsible Official;
  - (3) Identification of each coating used on each coating line;
  - (4) The mass of VOC per volume of each coating (e.g., lb VOC/gal), excluding water and exempt compounds, as applied, expected to be used each day on each on each coating line; and
  - (5) The time at which the facility's "day" begins if a time other than midnight is used to define a "day."

[06-096 C.M.R. ch. 129, § 7(A)(2)]

c. LP shall notify the Department in writing within thirty (30) calendar days of the use of any coatings that do not meet the VOC content limit.
 [06-096 C.M.R. ch. 129, § 8(B)(2)]

## The following shall replace Condition (41) of Air Emission License A-327-70-P-A.

## (41) **Finishing Line Ovens**

- A. The finishing line ovens shall only fire propane. [06-096 C.M.R. ch. 115, BACT (A-327-77-9-A, 8/8/2024)]
- B. The finishing line ovens shall each be equipped with low-NO<sub>x</sub> burners. [06-096 C.M.R. ch. 115, BACT (A-327-77-9-A, 8/8/2024)]
- C. Emissions shall not exceed the following: [06-096 C.M.R. ch. 115, BACT (A-327-77-9-A, 8/8/2024)]

Unit	Pollutant	lb/MMBtu
Finishing Line Ovens #1 - #9 (each)	РМ	0.008

## Departmental Findings of Fact and Order Part 70 Air Emission License Amendment #4

D. Emissions shall not exceed the following: [06-096 C.M.R. ch. 115, BACT (A-327-77-9-A, 8/8/2024)]

Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM2.5 (lb/hr)	NOx (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Finishing Line Ovens #1 - #4 (each)	0.04	0.04	0.04	0.25	0.41	0.05
Finishing Line Ovens #5 - #6 (each)	0.05	0.05	0.05	0.32	0.52	0.07
Finishing Line Ovens #7	0.04	0.04	0.04	0.26	0.43	0.06
Finishing Line Ovens #8 - #9 (each)	0.07	0.07	0.07	0.44	0.72	0.10

37

- E. Visible emissions from each of the finishing line ovens shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BACT (A-327-77-9-A, 8/8/2024)]
- F. LP shall demonstrate compliance with the emission limits above through performance testing upon request of the Department. [06-096 C.M.R. ch. 115, BACT (A-327-77-9-A, 8/8/2024)]]

Done and dated in Augusta, maine this  $8^{th}$  day of OCTOBER, 2024.

DEPARTMENT OF ENVIRONMENTAL PROTECTION BY: for MELANIE LOYZIM, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-327-70-O-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application:7/1/2024Date of application acceptance:7/8/2024

Date filed with the Board of Environmental Protection:

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

FILED

OCT 08, 2024

State of Maine Board of Environmental Protection