



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**Cousineau Wood Products of Maine, LLC
Somerset County
North Anson, Maine
A-103-71-O-N (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
After-the-Fact Renewal**

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

The Air Emission License for Cousineau Wood Products of Maine, LLC (Cousineau) expired on February 4, 2014. Cousineau has applied to renew their expired license permitting the operation of emission sources associated with their wood products and laminated wood manufacturing facility.

B. Emission Equipment

The following equipment is addressed in this air emission license:

**Stationary Fuel Burning Equipment
(Excluding Generators and Engines)**

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type</u>	<u>Dates of...</u>		<u>Stack #</u>
				<u>Manufacture</u>	<u>Installation</u>	
Boiler #1	27.0	3 tons/hr	Wood, used oil	1977	1977	1
Boiler #3	1.0	0.05 ton/hr		early 2000's	2008	7
Veneer Dryer (emissions from fuel combustion)	1.4	15.4 gal/hr	propane	1994	2010	9

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143

Generator

<u>Equipment</u>	<u>Max. Capacity (MMBtu/hour)</u>	<u>Output Capacity</u>	<u>Firing Rate</u>	<u>Fuel Type, % sulfur</u>	<u>Date of Manufacture</u>	<u>Stack #</u>
Emergency Generator	1.22	125 kW	8.9 gal/hr	Distillate Fuel, 0.0015% by wt.	1977	3

Process Equipment

<u>Equipment</u>	<u>Production Rate</u>	<u>Pollution Control Equipment</u>	<u>Stack #</u>
Paint Spray Booth	--	Filters	3
Wood Waste and Byproducts Handling Equipment: - Sawdust and Wood Waste Blower System - Bagger (Shavings) Silo	--	Dust collection bags Cyclone separator	--
Finger Jointing Process	--	No add-on control equipment	Fugitive
<u>Veneer Laminating Line</u> - Veneer Dryer (non-combustion emissions) - RF#1 Press - Veneer Dyes	--		
Kiln #2	50,000 BF/load		
<u>DymaLux Line</u> - HP#1 Press - Resin Dip	--		
RF#1 Press	2 MMBF/year		
HP#1 Press	1 MMBF/year		
UV#1 Line (including application of Wood Sealer and Top Coat)	1,000 ft ² /month		
Dipping Tubs	30,000 gal/year		
Drying Racks	200,000 BF/year	10	
			12/2013
			n/a: Units vent inside building.

Cousineau has also requested that the license be updated to provide an accurate inventory of emission units in use at the facility. Several units previously included in their air emission license, including Boiler #2 (firing #6 fuel oil), Generators #1, #2, and #3 (firing diesel fuel @ 0.05% sulfur), and the #1 Dry Kiln have been removed from the facility and thus removed from this license. A wood-fired boiler not previously included in the license, identified as Boiler #3 and installed at the facility in 2008, has been included in this license.

C. Application Classification

The previous air emission license for Cousineau expired on February 4, 2014. A complete application was not submitted prior to the expiration date; therefore, Cousineau is considered to be an existing source applying for an after-the-fact renewal. The Department has determined the facility is a minor source, and the application has been processed through *Major and Minor Source Air Emission License Regulations*, 06 096 CMR 115 (as amended). With the annual fuel limit on Boiler #1, the VOC limits associated with the various production processes, and the operating hours restriction on the Emergency Generator, the facility is licensed below the major source thresholds for criteria pollutants and is considered a synthetic minor. With the annual fuel limit on Boiler #1, the HAP limits associated with the paint booth, and the operating hours restriction on the emergency generator, the facility is licensed below the major source thresholds for hazardous air pollutants (HAP) and is considered an area source of 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 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment. BPT for an after-the-fact renewal requires an analysis similar to a Best Available Control Technology analysis per 06-096 CMR 115 (as amended).

B. Process Description

Cousineau is a manufacturing facility which produces hardwood lumber, veneer, and laminated wood products. The veneer and laminated products are used by Cousineau's customers, such as craftsmen and other companies, in a variety of fabrication applications such as gun stocks, pepper mills, etc. to create a final consumer product. Cousineau offers custom sized panels, blanks, and dowels to suit manufacturing needs. The hardwood lumber manufactured by Cousineau is sawn in widths of 3" and wider. Logs are received, debarked, and sawn square. When the clearest lumber possible has been obtained from the log, the wood block is sliced into boards. Smaller, edging saws square the exterior sides of the boards. After the lumber is cut, it is graded, computer stamped, sorted, and kiln-dried. After completion of the drying process, the lumber is re-sorted to account for any changes of grade that may take place in the kilns. The ends of some of the lumber are painted and the boards are strapped together for shipment. Other boards are sawn into smaller, higher grade pieces to be used for cabinet stock.

Sawdust from the lumber manufacturing process is pneumatically conveyed through a cyclone or via a vibrating conveyor and transported to two fuel storage bins. From the bins, the sawdust is used as wood fuel and fed by auger for combustion in Boiler #1 or Boiler #3. Larger wood waste pieces are chipped and sold. Cousineau also combusts

some chipped pallets and wood with a small amount of paint residue in the two wood-fired boilers.

Quantities of VOC and HAP emissions from process sources as identified in this air emission license are based on conservative manufacturing projections and the assumption that 100% of the VOC and HAP content in the components is released to atmosphere through fugitive building vents and air exchange avenues.

C. Boiler #1 and Boiler #3

Cousineau operates Boilers #1 and #3 for facility heat and for process heat for the kilns and paint booth. The boilers fire biomass fuel with a maximum capacity of 27 MMBtu/hour. The licensed biomass fuel includes wood chips, sawdust, bark, chipped pallets, and wood with paint residue. Cousineau may also add up to 2,000 gallons/year of used motor oil to their fuel mix by metering it into the auger. Boiler #1 was installed in 1977, and Boiler #3 was installed in 2008. Exhaust from Boiler #1 passes through a fly ash reinjection system before exiting through its own stack, Stack #1. Exhaust from Boiler #3 exit through Stack #7.

1. New Source Performance Standards (NSPS)

Due to its age, Boiler #1 is not subject to the New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for steam generating units greater than 10 MMBtu/hour and manufactured after June 9, 1989. Due to its size, Boiler #3 is not subject to NSPS 40 CFR Part 60, Subpart Dc.

2. BACT/BPT Findings

The BACT/BPT emission limits for Boilers #1 and #3 were based on the following:

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Source of Emission Factor</u>
PM, PM ₁₀ (Boiler #1)	0.47 lb/MMBtu	06-096 CMR 103(2)(A)(3)(a)
PM, PM ₁₀ (Boiler #3)	0.35 lb/MMBtu	AP-42, Table 1.6-1 (9/03)
SO ₂	0.025 lb/MMBtu	AP-42, Table 1.6-2 (9/03)
NO _x	0.22 lb/MMBtu	
CO	0.60 lb/MMBtu	
VOC	0.017 lb/MMBtu	AP-42, Table 1.6-3 (9/03)
Visible Emissions	–	06-096 CMR 101

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

<u>Unit</u>	<u>Pollutant</u>	<u>lb/MMBtu</u>
Boiler #1	PM	0.47

The BACT/BPT emission limits for Boiler #1 and Boiler #3 are the following:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1 27.0 MMBtu/hour	12.7	12.7	0.68	5.94	16.2	0.46
Boiler #3 1.0 MMBtu/hour	0.35	0.35	0.025	0.22	0.60	0.017

Visible emissions from Boiler #1 and from Boiler #3 shall not exceed 30% opacity on a six-minute block average, except for no more than two six-minute block averages in a continuous three-hour period.

In accordance with 06-096 CMR 101, Section 2(B)(3)(d), visible emissions from the fuel handling system shall not exceed an opacity of 20% on a six-minute block average basis, except for no more than one six-minute block average in a one-hour period.

The total fuel use for Boiler #1 shall not exceed 24,000 tons/year of wood waste at 50% moisture, based on a 12-month rolling total. The boiler may also fire up to 2,000 gallons of used motor oil per year.

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

$$\frac{\text{ton wood}}{\text{day}} = \frac{x \text{ gal water}}{\text{day}} \cdot \frac{8.34 \text{ lb steam}}{\text{gal water}} \cdot \frac{0.0003 \text{ ton wood}}{\text{lb steam}}$$

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

3. Periodic Monitoring

Periodic monitoring for Boiler #1 and Boiler #3 shall include recordkeeping to document fuel use both on a monthly and 12-month rolling total basis. Documentation shall include the type of fuel used.

4. National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (NESHAP)

Boiler #1 and Boiler #3 are subject to applicable requirements of 40 CFR Part 63, Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*. Boiler #1 is considered an existing biomass boiler rated greater than 10 MMBtu/hour, and Boiler #3 is considered an existing biomass boiler rated less than 10 MMBtu/hour.

A summary of the currently applicable federal 40 CFR Part 63 Subpart JJJJJ requirements is listed below. At this time, the Department has not taken delegation of this area source MACT (Maximum Achievable Control Technology) rule promulgated by EPA; however, Cousineau is still subject to the applicable

requirements. Notification forms and additional rule information can be found on the following website: <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

a. Compliance Dates, Notifications, and Work Practice Requirements

i. Initial Notification of Compliance

An Initial Notification submittal to EPA was due no later than January 20, 2014. [40 CFR §63.11225(a)(2)]

ii. Boiler Tune-Up Program

(a) A boiler tune-up program shall be implemented to include the initial tune-up of applicable boilers no later than March 21, 2014. [40 CFR §63.11223]

(1) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

Boiler Category	Tune-Up Frequency
New or Existing Oil, Biomass, and Coal fired boilers that are not designated as "Boilers with less frequent tune up requirements" below	Every 2 years
<i>New and Existing Oil, Biomass, and Coal fired Boilers with less frequent tune up requirements</i>	
Seasonal (see definition, 40 CFR §63.11237)	Every 5 years
Limited use (see definition, 40 CFR §63.11237)	Every 5 years
With a heat input capacity of <5MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR §63.11223(a) and Table 2]

(2) The tune-up compliance report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the concentration of CO in the effluent stream (ppmv) and oxygen in volume percent, measured at high fire or typical operating load, before and after the boiler tune-up, a description of any corrective actions taken as part of the tune-up of the boiler, and the types and amounts of fuels used over the 12 months prior to the tune-up of the boiler. [40 CFR §63.11223(b)(6)] The compliance report shall also include the company name and address; a compliance statement signed by a responsible official certifying truth, accuracy, and completeness; and a description of any deviations and corrective actions. [40 CFR §63.11225(b)]

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

- (1) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR §63.11223(b)(1)]
 - (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR §63.11223(b)(2)]
 - (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR §63.11223(b)(3)]
 - (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR §63.11223(b)(4)]
 - (5) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR §63.11223(b)(5)]
 - (6) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR §63.11223(b)(7)]
- (c) A Notification of Compliance Status was to be submitted to EPA after the initial boiler tune-up had been completed. [40 CFR §63.11225(a)(4) and 40 CFR §63.11214(b)]

iii. Energy Assessment

Boiler #1 is subject to the energy assessment requirement as follows:

- (a) A one-time energy assessment was required to be performed by a qualified energy assessor on the applicable boilers no later than March 21, 2014. [40 CFR §63.11196(a)(3)]
- (b) The energy assessment was required to include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected

boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments. [40 CFR Part 63, Subpart JJJJJ, Table 2(4)]

(c) A Notification of Compliance Status is required to be submitted to EPA after completion of the energy assessment. [40 CFR §63.11225(a)(4) and 40 CFR §63.11214(c)]

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 CFR Part 63, Subpart JJJJJ including the following [40 CFR §63.11225(c)]: copies of notifications and reports with supporting compliance documentation; identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation. Records shall be in a form suitable and readily available for expeditious review.

EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 CFR §63.1125(a)(4)(vi)]

D. Wood Waste and Byproducts Handling Equipment

Cousineau utilizes dust collection bags to control particulate emissions from the sawdust and wood waste blower/conveying system and a cyclone separator to control emissions from the Bagger (Shavings) Silo.

In accordance with 06-096 CMR 101, Section 2(B)(3)(d), visible emissions from the Wood Waste and Byproducts Handling Equipment shall not exceed 20% opacity on a six-minute block average basis, except for no more than one six-minute block average in a one-hour period.

E. Emergency Generator

Cousineau operates one emergency generator. The Emergency Generator is rated at a maximum heat input of 1.22 MMBtu/hour and fires distillate fuel with a sulfur content not to exceed 0.0015% by weight. The unit was manufactured in 1977, prior to the applicability dates of NSPS requirements found in 40 CFR Part 60.

1. BACT/BPT Findings

The BACT/BPT emission limits for the Emergency Generator are based on the following:

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Source of Emission Factor</u>
PM, PM ₁₀	0.31 lb/MMBtu	AP-42, Table 3.3-1 (10/96)
SO ₂	0.0015 lb/MMBtu	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	AP-42, Table 3.3-1 (10/96)
CO	0.95 lb/MMBtu	
VOC	0.36 lb/MMBtu	
Visible Emissions	–	06-096 CMR 101

The BACT/BPT emission limits for the Emergency Generator are the following:

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM₁₀ (lb/hr)</u>	<u>SO₂ (lb/hr)</u>	<u>NO_x (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
Emergency Generator 1.22 MMBtu/hour Distillate fuel	0.38	0.38	0.002	5.38	1.16	0.44

Visible emissions from the distillate fuel-fired Emergency Generator shall not exceed 20% opacity on a six-minute block average, except for no more than two six-minute block averages in a three-hour period.

2. 40 CFR Part 63, Subpart ZZZZ

The federal regulation 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines*, is applicable to the Emergency Generator. The unit is considered an existing, emergency stationary reciprocating internal combustion engine (RICE) at an area HAP source and is not subject to NSPS 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 this unit from the federal requirements.

a. Emergency Definition

Emergency stationary RICE means any stationary reciprocating internal combustion engine that meets all of the following criteria:

- (1) The stationary RICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc. There is no time limit on the use of emergency stationary RICE in emergency situations.
- (2) Paragraph (1) above notwithstanding, the emergency stationary RICE may be operated for any combination of the following purposes for a maximum of 100 hours per calendar year:
 - (i) Maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
 - (ii) Emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, *Capacity and Energy Emergencies*, or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
 - (iii) Periods where there is a 5% or greater deviation of voltage or frequency below standard voltage or frequency.
- (3) Paragraphs (1) and (2) above notwithstanding, emergency stationary RICE may be operated for up to 50 hours per calendar year in non-emergency situations. These 50 hours are counted as part of the 100 hours per calendar year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation, as provided in paragraph (2) above.

The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving, non-emergency demand response, or to generate income for

a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity, except as follows:

The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

- (i) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
- (ii) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
- (iii) The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
- (iv) The power is provided only to the facility itself or to support the local transmission and distribution system.
- (v) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

The Emergency Generator shall be limited to the usage outlined in 40 CFR §63.6640(f) and therefore may be classified as an existing emergency stationary RICE as defined in 40 CFR Part 63, Subpart ZZZZ. Failure to comply with all of the requirements listed in 40 CFR §63.6640(f) may cause this engine to not be considered an emergency engine and therefore subject to all the requirements for a non-emergency engine.

b. 40 CFR Part 63, Subpart ZZZZ Requirements

(1) Operation and Maintenance Requirements [40 CFR §63.6603(a) and Table 2(d)]

	Operating Limitations*
Compression ignition (distillate fuel) units: <i>Emergency Generator</i>	<ul style="list-style-type: none"> - Change oil and filter every 500 hours of operation or annually, whichever comes first. - Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary. - Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The generator shall be operated and maintained according to the manufacturer's emission-related written instructions, or Cousineau 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 CFR §63.6625(e)]

(2) Optional Oil Analysis Program

Cousineau has the option of utilizing an oil analysis program which complies with the requirements of 40 CFR §63.6625(i) in order to extend the specified oil change requirement. If this option is used, Cousineau 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 CFR §63.6625(i)]

(3) Non-Resettable Hour Meter Requirement

A non-resettable hour meter shall be installed and operated on the generator. [40 CFR §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 CFR §63.6625(h) & 40 CFR Part 63, Subpart ZZZZ Table 2d]

(5) Annual Time Limit for Maintenance and Testing

The Emergency Generator shall be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supplying power as part of a financial arrangement with another entity unless the conditions in 40 CFR §63.6640(f)(4)(ii) are met). [40 CFR §63.6640(f)]

(6) Recordkeeping

Cousineau shall keep records that include maintenance conducted on the generator and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the engine was used in emergency operation, including what classified the operation as emergency, and the number of hours the engine operated for non-emergency purposes. If the generator is operated during a period of demand response, during deviation from standard voltage or frequency, or to supply power during a non-emergency situation as part of a financial arrangement with another entity as specified in 40 CFR §63.6640(f)(4)(ii), Cousineau shall keep records of the notification of the emergency situation, and the date, start time, and end time of generator operation for these purposes. [40 CFR §63.6655(e) and (f)]

(7) Requirements for Demand Response Availability Over 15 Hours Per Year (and greater than 100 brake hp)

If Cousineau operates or is contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or for supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in 40 CFR §63.6640(f)(4)(ii), the facility shall submit an annual report containing the information in 40 CFR §63.6650(h)(1)(i) through (ix). The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. The annual report must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI), accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form is not available in CEDRI at the time that the report is due, the written report must be submitted to the following address:

Director, Office of Ecosystem Protection
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, MA 02109-3912
[40 CFR §63.6650(h)]

F. Kiln

Cousineau operates Kiln #2 for drying of lumber, with heat for the kiln provided by Boilers #1 and #3; Kiln #1 has been retired. Kiln #2, manufactured and installed in 1980, has a maximum capacity of 50,000 BF/load and 1.2 million BF/year. The wood dried is primarily maple and birch species. Regulated pollutants emitted from indirectly heated lumber drying kilns are VOCs.

Cousineau has been limited to a yearly throughput in two kilns of 7.5 million board feet per year on a 12-month rolling total basis; however, since Kiln #2 is the only kiln in operation, the facility shall be limited to its capacity, 1.2 million BF/year.

Emission factors used to calculate VOC emissions from Kiln #2 and resulting annual emissions in tons/year are as follows, assuming a 50/50 mix of maple and birch:

<u>Pollutant</u>	<u>Wood Species</u>	<u>Emission Factor, lb VOC/thousand BF</u>	<u>Factor Source</u>	<u>Emissions, ton/year</u>
VOC	Maple, Birch	0.46	From WebFIRE emission factor for similar process	0.28

Cousineau shall not exceed 0.28 tons per year VOC from the drying Kiln #2 based on a 12-month rolling total. The throughput shall be documented by monthly records of board feet of lumber processed in Kiln #2. [A-103-71-L-R (February 5, 2009), BPT]

G. Paint Spray Booth

Cousineau operates one Paint Spray Booth. Regulated air pollutants emitted from this process include PM and VOC; there are no HAP-containing coatings applied in the Paint Spray Booth. Cousineau shall maintain particulate filters in the Paint Spray Booth. Visible emissions from the Paint Spray Booth shall not exceed 5% opacity on a six-minute block average basis.

The facility shall not exceed 1.0 tons per year of VOC emissions from coatings sprayed in the Paint Spray Booth, based on a 12-month rolling total. Cousineau shall document compliance by monthly records of the amount of each coating used and the VOC content of each coating. [A-103-71-L-R (February 5, 2009) and 06-096 CMR 115, BPT]

H. Finger Jointing Process

Cousineau operates a finger jointing operation, which helps reduce waste by reclaiming smaller lengths of wood. Emissions of VOC and/or HAP are released in this process from the glue/adhesive used to join the materials. Cousineau shall not exceed 0.01 tons per year of VOC emissions and 0.01 tons per year of HAP emissions from the finger jointing process, both based on a 12-month rolling total. Compliance shall be documented by monthly records of the amount of glue used and the contents of VOC and HAP. [A-103-71-L-R (February 5, 2009), BPT]

I. Veneer Laminating Line [A-103-71-L-R (February 5, 2009), BACT/BPT]

Cousineau operates a Veneer Laminating Line for the production of wooden gunstocks, which includes operation of a radio frequency glue press with a capacity of 850,000 BF/year of finished material and which was installed in 2009. Some glues used in this laminating process contain small amounts of VOCs and/or HAPs.

BACT for non-combustion emissions from the Veneer Laminating Line includes the following:

1. Cousineau shall not exceed 5.0 tons per year of VOC emissions and 0.5 tons per year of HAP emissions from the Veneer Laminating Line, both on a 12-month rolling total basis. Compliance shall be demonstrated by monthly records indicating the amount, type, and VOC and HAP contents of each glue material component used (excluding water).
2. Visible emissions from the Veneer Laminating Line shall not exceed 5% opacity on a six-minute block average basis.

J. Veneer Dryer

Cousineau operates a propane-fired Veneer Dryer with a rated heat input of 1.4 MMBtu/hour. The unit was manufactured in 1994 and installed in 2010, and exhausts through its own stack, Stack #9. Due to the size of this fuel burning unit and the

comparable quantities of resulting emissions from this fuel, the Department finds that firing propane in the Veneer Dryer meets BACT/BPT requirements.

1. The BACT/BPT emission factors and corresponding emission limits for the Veneer Dryer are as follows:

Pollutant	Factor	Factor Source	Emission Limit, lb/hr
PM, PM ₁₀	0.02 lb/MMBtu	06-096 CMR 115, BACT/BPT	0.028
SO ₂	0.054 lb/10 ³ gal Using 0.10S lb/10 ³ gal and fuel sulfur content of 0.54 gr per 100 ft ³	AP-42, Table 1.5-1 (dated 7/08) for propane (gal)	0.0008
NO _x	13 lb/10 ³ gal		0.20
CO	7.5 lb/10 ³ gal		0.16
VOC	1.0 lb/10 ³ gal		0.015

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

2. Visible emissions from the Veneer Dryer stack shall not exceed 10% opacity on a six-minute block average basis, except for no more than one six-minute block average in a three-hour period. [06-096 CMR 101(2)(B)(1)(c), BACT/BPT]

K. DymaLux Line [A-103-71-N-M (November 26, 2013), BACT]

1. Process Description

The resin-impregnated laminated wood product line, the DymaLux line, starts with wood veneer which has (or has not, as required by the customer's specifications) been dyed, dried, and stored in a climate-controlled environment until needed for production. To manufacture the DymaLux material, veneer is impregnated with resin glue, dried to the desired moisture content, then hot-pressed to cure the glue, forming solid panels of DymaLux product, a waterproof and heat resistant material with extremely high density, hardness, and durability. The DymaLux line includes HP#1 Press and Resin Dip, as identified in the license renewal application.

Air pollutant emissions from this process are VOC and HAP contained in the resin. There are no other air pollutants emitted from the DymaLux manufacturing process.

The following emissions were calculated based on data from the resin manufacturer and the projected use of 30,000 gallons/year of resin with a density of 10.5 lb/gallon:

<u>Pollutant</u>	<u>Concentration in Resin</u>	<u>Total Emitted, lb/year</u>	<u>Total Emitted, ton/year</u>
VOC	0.7% by weight	2205	1.1
HAP	0.68% by weight	2142	1.1

2. 06-096 CMR 129, *Surface Coating Facilities*

The requirements of 06-096 CMR 129 are not applicable to the DymaLux Line. The rule is applicable to the surface coating of various substrates; and *coating*, as defined in the rule, means a material applied in a thin layer to a surface as a protective, decorative, or functional film. The wood substrate is impregnated with resin in the DymaLux process; thus, the resin not a surface coating.

3. 06-096 CMR 159, *Control of Volatile Organic Compounds from Adhesives and Sealants*

The requirements of 06-096 CMR 159 are not applicable to the DymaLux Line. This rule applies to uses within Maine of any adhesive, sealant, adhesive primer, or sealant primer, applied to a product for compensation. No material is used in the DymaLux process for these purposes, as defined in the rule.

4. BACT Determination

The Department's determination of BACT for the DymaLux Line includes the following:

Emissions from the DymaLux Line shall not exceed 1.1 ton/year of VOC on a 12-month rolling total basis, and emissions from the DymaLux Line shall not exceed 1.1 ton/year of total HAP on a 12-month rolling total basis. Compliance with these limits shall be demonstrated by monthly records of the amounts, types, and VOC and HAP contents of each resin used.

L. UV #1 Line

The UV #1 Line is a separate plywood coating line, installed in December 2013, and includes the treatment of plywood with wood sealer and top coating. There are no HAPs contained in the wood sealer and top coating materials used in this process. Based on conservative manufacturing estimates, Cousineau shall not exceed 0.2 tons per year of VOC emissions from the UV #1 Line, on a 12-month rolling total basis. Compliance shall be demonstrated by monthly records indicating the amount, type, and VOC content of each wood sealer and top coating component used (excluding water).

M. Process HAP Emissions [A-103-71-L-R (February 5, 2009), BPT]

Cousineau shall not exceed a facility limit of 9.9 tons per year of any single HAP or 9.9 tons per year of total combined HAPs, on a 12-month rolling total basis. This shall include HAP emissions from the Finger Jointing Process, the Paint Spray Booth, the

Veneer Laminating Line, the Veneer Dryer, and the DymaLux Line. Cousineau shall keep records of the amounts of HAP containing material used, the HAP content of the material, and the total HAP emissions assuming 100% of HAP content is released to the atmosphere, on both a monthly and a 12-month rolling total basis.

N. Parts Washer

The parts washer at the Cousineau facility is subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended), and records shall be kept documenting compliance.

O. Fugitive Emissions

Visible emissions from a fugitive emission source, including stockpiles and roadways, shall not exceed 20% opacity except for no more than five minutes in any one-hour period. Compliance shall be determined by an aggregate of the individual fifteen-second opacity observations which exceed 20% in any one hour.

P. General Process Emissions

Visible emissions from any general process source otherwise not specifically addressed shall not exceed 20% opacity on a six-minute block average basis, except for no more than one six-minute block average in a one-hour period.

Q. Annual Emissions

1. Total Annual Emissions

Cousineau shall be restricted to the following annual emissions, based on a 12-month rolling total. Emissions are based on the following:

- 24,000 tons per year of fuel use in Boiler #1;
- 8,760 hours of operation of Boiler #3 and the Veneer Dryer;
- 100 hours of operation of the Emergency Generator; and,
- 1.2 million board feet per year through drying Kiln #2.

Total Licensed Annual Emissions for the Facility

Tons/year

(used to calculate the annual license fee)

	PM	PM₁₀	SO₂	NO_x	CO	VOC	Total HAP
Boiler #1	50.8	50.8	2.7	23.8	64.8	1.8	--
Boiler #3	1.5	1.4	0.1	1.0	2.6	0.1	--
Emergency Generator	0.02	0.02	0.0001	0.3	0.06	0.02	--
Kiln #2	--	--	--	--	--	0.28	--
Finger Jointing Process	--	--	--	--	--	0.01	0.01
Paint Spray Booth	--	--	--	--	--	1.0	--
Veneer Laminating Line	--	--	--	--	--	5.0	0.5

	PM	PM₁₀	SO₂	NO_x	CO	VOC	Total HAP
Veneer Dryer	0.12	0.12	0.004	0.88	0.70	0.07	--
DymaLux Line	--	--	--	--	--	1.1	1.1
UV Line	--	--	--	--	--	0.2	--
Total TPY*	52.4	52.3	2.8	26.0	68.2	9.6	1.6

* rounded to the nearest tenth of a ton

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans*, 40 CFR Part 52, Subpart A, §52.21 *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

Based on the facility's fuel use limit(s); the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98; Cousineau is below the major source threshold of 100,000 tons of CO₂e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

III. AMBIENT AIR QUALITY ANALYSIS

Cousineau previously submitted an ambient air quality impact analysis for air emission license A-103-74-F-M/R (July 22, 1996) demonstrating that emissions from the facility, in conjunction with all other sources, do not violate Ambient Air Quality Standards (AAQS). An additional air quality impact analysis is not required for this renewal.

ORDER

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

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

The Department hereby grants Air Emission License A-103-71-O-N subject to the following conditions.

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

STANDARD CONDITIONS

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

- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- A. Perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 - 1. Within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 - 2. Pursuant to any other requirement of this license to perform stack testing.
 - B. Install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - C. Submit a written report to the Department within thirty (30) days from date of test completion.
[06-096 CMR 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. Within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
 - B. The days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days

during which no violation occurred or that the violation was not continuing in nature;
and

- C. The licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.[06-096 CMR 115]
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the Clean Air Act (CAA), any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]
- (15) Upon written request from the Department, the licensee shall establish and maintain such records; make such reports; install, use, and maintain such monitoring equipment; sample such emissions in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe; and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

SPECIFIC CONDITIONS

(16) **Boiler #1 and Boiler #3**

- A. Cousineau is licensed to fire biomass in Boiler #1 and Boiler #3. Biomass fuel shall include wood chips, sawdust, bark, chipped pallets, and wood with paint residue. The fuel mix is also licensed to include up to 2,000 gallons per year of used motor oil, on a 12-month rolling total. The motor oil shall be metered into the wood fuel auger. Cousineau shall maintain records of the amount of motor oil added to the fuel mix on a monthly and 12-month rolling total. [A-103-71-L-R (February 5, 2009), BPT]
- B. Total fuel use for Boiler #1 shall not exceed 24,000 tons per year, based on a 12-month rolling total, of biomass fuel at 50% moisture. Fuel records, including the amount of fuel fired, shall be maintained on a monthly and a 12-month rolling total basis. Cousineau shall use the following formula to calculate fuel use:

$$\frac{\text{ton wood}}{\text{day}} = \frac{x \text{ gal water}}{\text{day}} \cdot \frac{8.34 \text{ lb steam}}{\text{gal water}} \cdot \frac{0.0003 \text{ ton wood}}{\text{lb steam}}$$

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

- C. Boiler #1 shall exhaust through the fly ash reinjection system at all times it is in operation. [A-103-71-L-R (February 5, 2009), BPT]
- D. Cousineau shall not operate Boiler #1 and Boiler #3 simultaneously at any time except for periods of start-up and shut-down. [06-096 CMR 115, BPT]
- E. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.47	06-096 CMR 103(2)(A)(3)(a)

- F. The BACT/BPT emission limits for Boiler #1 and Boiler #3 are the following:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1 27.0 MMBtu/hour	12.7	12.7	0.68	5.94	16.2	0.46
Boiler #3 1.0 MMBtu/hour	0.35	0.35	0.025	0.22	0.60	0.017

- G. Visible emissions from Boiler #1 and from Boiler #3 shall not exceed 30% opacity on a six-minute block average, except for no more than two six-minute block averages in a continuous three-hour period. [06-096 CMR 101]
- H. In accordance with 06-096 CMR 101, Section 2(B)(3)(d), visible emissions from the fuel handling system shall not exceed an opacity of 20% on a six-minute block average basis, except for no more than one six-minute block average in a one-hour period. [06-096 CMR 101 (2)(B)(3)(d)]
- I. 40 CFR Part 63, Subpart JJJJJ Requirements for Boiler #1 and Boiler #3 [incorporated under 06-096 CMR 115, BPT]
 - 1. The facility shall implement a boiler tune-up program to include the initial tune-up of applicable boilers. [40 CFR §63.11223]
 - a. Each tune-up shall be conducted at a frequency and based on the size, age, and operations of the boiler, as specified in the rule and the table below:

Boiler Category	Tune-Up Frequency
New or Existing Oil, Biomass, and Coal fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below	Every 2 years
<i>New and Existing Oil, Biomass, and Coal fired Boilers with less frequent tune up requirements</i>	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
With a heat input capacity of <5MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR §63.11223(a) and Table 2]

- b. The tune-up compliance report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the concentration of CO in the effluent stream (ppmv) and oxygen in volume percent, measured at high fire or typical operating load, **before and after** the boiler tune-up, a description of any corrective actions taken as part of the tune-up of the boiler, and the types and amounts of fuels used over the 12 months prior to the tune-up of the boiler. [40 CFR §63.11223(b)(6)] The compliance report shall also include the company name and address; a compliance statement signed by a responsible official certifying truth, accuracy, and completeness; and a description of any deviations and corrective actions. [40 CFR §63.11225(b)]
2. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
 - a. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR §63.11223(b)(1)]
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR §63.11223(b)(2)]
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR §63.11223(b)(3)]
 - d. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR §63.11223(b)(4)]

- e. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR §63.11223(b)(5)]
 - f. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR §63.11223(b)(7)]
 3. After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA. [40 CFR §63.11225(a)(4) and 40 CFR §63.11214(b)]
 4. Energy Assessment
Boiler #1 is subject to the energy assessment requirement, as follows:
 - a. A one-time energy assessment is required to be performed by a qualified energy assessor on the applicable boilers. [40 CFR §63.11196(a)(3)]
 - b. The energy assessment was required to include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments. [40 CFR Part 63, Table 2(4)]
 - c. A Notification of Compliance Status shall be submitted to EPA. [40 CFR §63.11225(a)(4) and 40 CFR §63.11214(c)]
 5. Records shall be maintained consistent with the requirements of 40 CFR Part 63, Subpart JJJJJ including the following [40 CFR §63.11225(c)]: copies of notifications and reports with supporting compliance documentation; identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation. Records shall be in a form suitable and readily available for expeditious review.

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

Visible emissions from the Wood Waste and Byproducts Handling Equipment shall not exceed 20% opacity on a six-minute block average basis, except for no more than one six-minute block average in a one-hour period. [06-096 CMR 101 (2)(B)(3)(d)]

(17) **Emergency Generator** [A-103-71-L-R (February 5, 2009), BPT]

A. The Emergency Generator shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 CMR 115]

B. Emissions shall not exceed the following:

<u>Unit</u>	<u>PM</u> <u>(lb/hr)</u>	<u>PM₁₀</u> <u>(lb/hr)</u>	<u>SO₂</u> <u>(lb/hr)</u>	<u>NO_x</u> <u>(lb/hr)</u>	<u>CO</u> <u>(lb/hr)</u>	<u>VOC</u> <u>(lb/hr)</u>
Emergency Generator 1.22 MMBtu/hr Distillate fuel	0.38	0.38	0.002	5.38	1.16	0.44

C. Visible emissions from the Emergency Generator shall not exceed 20% opacity on a six-minute block average, except for no more than two six-minute block averages in a three-hour period. [06-096 CMR 101]

D. The sulfur content of fuel fired in the Emergency Generator shall be limited to 0.0015% sulfur by weight. Compliance shall be demonstrated by fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 CMR 115, BPT]

E. The Emergency Generator shall meet the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, including the following:

1. Operation and Maintenance Requirements

Cousineau shall meet the following operational limitations for the compression ignition emergency generator:

- a. Change the oil and filter annually,
- b. Inspect the air cleaner annually and replace as necessary, and
- c. Inspect the hoses and belts annually and replace as necessary.

A log shall be maintained documenting compliance with the operational limitations.

[40 CFR §63.6603(a) and Table 2(d); and 06-096 CMR 115]

2. Oil Analysis Program Option

Cousineau has the option of utilizing an oil analysis program which complies with the requirements of 40 CFR §63.6625(i) in order to extend the specified oil change requirement. If this option is used, Cousineau 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 CFR §63.6625(i)]

3. Non-Resettable Hour Meter

A non-resettable hour meter shall be installed and operated on the Emergency Generator. [40 CFR §63.6625(f)]

4. 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 CFR §63.6625(h) and 40 CFR Part 63, Subpart ZZZZ Table 2d]

5. Annual Time Limit for Maintenance and Testing

The Emergency Generator shall be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supplying power as part of a financial arrangement with another entity unless the conditions in 40 CFR §63.6640(f)(4)(ii) are met). [40 CFR §63.6640(f)]

6. Recordkeeping

Cousineau shall keep records that include maintenance conducted on the generator and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the engine was used in emergency operation, including what classified the operation as emergency, and the number of hours the engine operated for non-emergency purposes. If the generator is operated during a period of demand response, during deviation from standard voltage or frequency, or to supply power during a non-emergency situation as part of a financial arrangement with another entity as specified in 40 CFR §63.6640(f)(4)(ii), Cousineau shall keep records of the notification of the emergency situation, and the date, start time, and end time of generator operation for these purposes. [40 CFR §63.6655(e) and (f)]

7. Requirements For Demand Response Availability Over 15 Hours Per Year (and greater than 100 brake hp)

If Cousineau operates or is contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or for supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in 40 CFR §63.6640(f)(4)(ii), the facility shall submit an annual report containing the information in 40 CFR §63.6650(h)(1)(i) through (ix). The first annual report must cover the calendar year 2015 and must be submitted no later

than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. The annual report must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI), accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form is not available in CEDRI at the time that the report is due, the written report must be submitted to the following address:

Director, Office of Ecosystem Protection
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, MA 02109-3912
[40 CFR §63.6650(h)]

(18) **Kilns** [06-096 CMR 115, BPT]

- A. Cousineau shall not exceed a yearly throughput of 1.2 million board feet per year through Kiln #2 based on a 12-month rolling total.
- B. Cousineau shall keep monthly and 12-month rolling records of board feet processed in Kiln #2 to document compliance with the above limit.

(17) **Finger Jointing Process** [A 103 71 L-R (February 5, 2009) and 06-096 CMR 115, BPT]

Cousineau shall not exceed 0.01 tons per year of VOC emissions and 0.01 tons per year of HAP emissions from the finger jointing process, both based on a 12-month rolling total. Compliance shall be documented by monthly records of the amount of glue used and the contents of VOC and HAP.

(19) **Paint Spray Booth** [A-103-71-L-R (February 5, 2009) and 06-096 CMR 115, BPT]

- A. Cousineau shall not exceed 1.0 tons per year of VOC emissions from paint sprayed in the spray booth, based on a 12-month rolling total. Compliance shall be documented by monthly records of the amount of paint used and the VOC content of the paint.
- B. Cousineau shall maintain particulate filters in the Paint Spray Booth.
- C. Visible emissions from the Paint Spray Booth shall not exceed 5% opacity on a six-minute block average basis.

(20) **Veneer Laminating Line** [A-103-71-M-A (December 5, 2008), BACT]

- A. Cousineau shall not exceed 5.0 tons per year of VOC emissions and 0.5 tons per year of HAP emissions from the Veneer Laminating Line, both on a 12-month rolling total basis. Compliance shall be demonstrated by monthly records indicating the amount, type, and VOC and HAP contents of each glue material component used (excluding water).

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

(21) **Veneer Dryer**

A. Emissions shall not exceed the following: [06-096 CMR 115, BACT/BPT]

	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Veneer Dryer 1.4 MMBtu/hr	0.028	0.028	negligible	0.20	0.16	0.015

B. Visible emissions from the Veneer Dryer stack shall not exceed 10% opacity on a six-minute block average basis, except for no more than one six-minute block average in a three-hour period. [06-096 CMR 101(2)(B)(1)(c), BACT/BPT]

(22) **DymaLux Line** [A-103-71-N-M (November 26, 2013), BACT]

A. Cousineau shall keep records of the amounts, types, and VOC and HAP contents of each resin used on the DymaLux line. Records shall be kept both on a monthly and a 12-month rolling total basis.

B. Emissions from the DymaLux Line shall not exceed 1.1 ton/year of VOC on a 12-month rolling total basis.

C. Emissions from the DymaLux Line shall not exceed 1.1 ton/year of total HAP on a 12-month rolling total basis.

(23) **UV #1 Line**

Cousineau shall not exceed 0.2 tons per year of VOC emissions from the UV #1 Line, on a 12-month rolling total basis. Compliance shall be demonstrated by monthly records indicating the amount, type, and VOC content of each wood sealer and top coating component used (excluding water).

(24) **Process HAP Emissions** [A-103-71-L-R (February 5, 2009), BPT]

Cousineau shall not exceed a facility limit of 9.9 tons per year of any single HAP or 9.9 tons per year of total combined HAPs, on a 12-month rolling total basis. Cousineau shall keep records of the amounts of HAP containing material used and the HAP content of the material on a monthly and 12-month rolling total.

(25) **Parts Washer** [06-096 CMR 130]

Parts washers at Cousineau are subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended).

- A. Cousineau shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]
- B. The following are exempt from the requirements of 06-096 CMR 130:
 1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg or less, at 20° C (68° F);
 2. Wipe cleaning; and,
 3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
- C. The following standards apply to cold cleaning machines that are applicable sources under Chapter 130.
 1. Cousineau shall attach a permanent conspicuous label to each unit summarizing the following operational standards:
 - a. Waste solvent shall be collected and stored in closed containers.
 - b. Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
 - c. Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
 - d. The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
 - e. Sponges, fabric, wood, leather, paper products, and other absorbent materials shall not be cleaned in the parts washer.
 - f. When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air-agitated solvent baths may not be used.
 - g. Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
 - h. Work area fans shall not blow across the opening of the parts washer unit.
 - i. The solvent level shall not exceed the fill line.
 2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches.

(26) **Fugitive Emissions**

Visible emissions from a fugitive emission source including stockpiles and roadways shall not exceed 20% opacity except for no more than five minutes in any one-hour period. Compliance shall be determined by an aggregate of the individual 15-second opacity observations which exceed 20% in any one hour. [06-096 CMR 101]

(27) **General Process Sources**

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis, except for no more than one six-minute block average in a one-hour period. [06-096 CMR 101]

(28) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of either of the following methods:

- A. A computer program and accompanying instructions supplied by the Department; or
- B. A written emission statement containing the information required in 06-096 CMR 137.

The emission statement must be submitted as specified by the date in 06-096 CMR 137.

- (29) Cousineau shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 12 DAY OF September, 2014.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Cora for
PATRICIA W. AHO, COMMISSIONER

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

[Note: If a renewal application, determined as complete by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 MRSA §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: July 3, 2014

Date of application acceptance: July 7, 2014

Date filed with the Board of Environmental Protection:

This Order prepared by Jane E. Gilbert, Bureau of Air Quality.

