



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE  
GOVERNOR

PATRICIA W. AHO  
COMMISSIONER

**Lepage Bakeries, Inc.**  
**d/b/a Lepage Bakeries, Inc. Park**  
**Street**  
**Androscoggin**  
**Lewiston, Maine**  
**A-968-71-B-N/A (SM)**

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

After review of the air emissions license after-the-fact license renewal application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., §344 and §590, the Department finds the following facts:

**I. REGISTRATION**

**A. Introduction**

The Air Emission License for Lepage Bakeries, Inc. (Lepage) expired on May 16, 2012. Lepage has applied to renew their expired license permitting the operation of emission sources associated with their Park Street facility. In December 2012 Lepage submitted an amendment to their renewal license application to increase their volatile organic compound (VOC) emissions limit from 24.5 tons per year to 39 tons per year to provide additional flexibility in reacting to market demand changes.

The equipment addressed in this license is located at Park Street, Lewiston, Maine.

**B. Emission Equipment**

The following equipment is addressed in this air emission license:

**Fuel Burning Process Equipment**

<u>Equipment ID</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate scf/hr</u>	<u>Fuel Type, % sulfur</u>	<u>Stack ID</u>
Bread Oven	6.37	6,067	natural gas, neg.	Bread Oven Stack
Roll Oven	2.8	2,667	natural gas, neg.	Roll Oven Stack

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 04679-2094  
(207) 764-0477 FAX: (207) 760-3143

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

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

2

Lepage has a natural gas fired 0.868 MMBtu/hr Donut Fryer which is considered insignificant per Appendix B Section B(2) of 06-096 CMR 115 but is mentioned here for inventory purposes only.

**Boilers**

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Stack #</u>
Boiler #1	1.68	1,600	natural gas, neg.	Blr 1 Stack
Boiler #2	1.68	1,600	natural gas, neg.	Blr 2 Stack

Lepage has a natural gas fired 0.85 MMBtu/hr Hot Water Heater which is considered insignificant per Appendix B Section B(2) of 06-096 CMR 115 but is mentioned here for inventory purposes only.

**Generator**

<u>Equipment</u>	<u>Power Output KW</u>	<u>Firing Rate (gal/hr)</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Install. Date</u>	<u>Stack #</u>
Generator #1	900	63.9	8.75	2007	Gen 1

**C. Application Classification**

The previous air emission license for Lepage expired on May 16, 2012. A complete application was not submitted prior to the expiration date, therefore Lepage is considered to be an existing source applying for an after-the-fact renewal. With an operating hours restriction on the emergency generator, and the facility restriction on the VOC emissions, the facility is listed below the major source thresholds and is considered a synthetic minor. 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).

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

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

3

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

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).

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

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

### **Process Description**

#### B. Process Description

The baking part of the facility consists of a bread oven, and a roll oven. In bread baking, the yeast metabolizes sugar through anaerobic fermentation producing both carbon dioxide and ethanol. Ethanol is a volatile organic compound (VOC) which remains in a liquid state in the bread through the prebaking process and, when exposed to high temperatures through baking, vaporizes.

The ovens are not boilers therefore are not subject to any federal requirements such as New Source Performance Standard (NSPS) 40 CFR Part 60, Subpart Dc and the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR Part 63 Subpart JJJJJ).

**Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)**

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

4

**C. Bread Oven**

The Bread Oven has a heat input of 6.37 MMBtu/hr firing natural gas.

BACT Findings for the Bread Oven are the following:

PM/PM<sub>10</sub> – 0.05 lb/MMBtu based on 06-096 CMR 103; 0.32 lb/hr.  
SO<sub>2</sub> –0.6 lb/MMscf from AP-42, Table 1.4-2 (dated 7/98); 0.01 lb/hr  
NO<sub>x</sub> –100 lb/MMscf from AP-42, Table 1.4-1 (dated 7/98); 0.61 lb/hr  
CO –84 lb/MMscf from AP-42, Table 1.4-1 (dated 7/98); 0.51 lb/hr  
VOC –based on an emission factor of 5.5 lb/MMscf from AP-42, Table 1.4-2  
(dated 7/98) ; 0.03 lb/hr  
Opacity – Visible emissions from the Bread Oven Stack shall not exceed an  
opacity of 10% on a 6 minute block average basis, except for no more than  
one (1) six (6) minute block average in a 3 hour period.

Periodic monitoring for the Bread Oven 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.

**D. Roll Oven**

The Roll Oven has a heat input of 2.8 MMBtu/hr firing natural gas.

BACT Findings for the Bread Oven are the following:

PM/PM<sub>10</sub> – 0.05 lb/MMBtu based on 06-096 CMR 103; 0.14 lb/hr.  
SO<sub>2</sub> –0.6 lb/MMscf from AP-42, Table 1.4-2 (dated 7/98); 0.01 lb/hr  
NO<sub>x</sub> –100 lb/MMscf from AP-42, Table 1.4-1 (dated 7/98); 0.27 lb/hr  
CO –84 lb/MMscf from AP-42, Table 1.4-1 (dated 7/98); 0.22 lb/hr  
VOC –based on an emission factor of 5.5 lb/MMscf from AP-42, Table 1.4-2  
(dated 7/98) ; 0.01 lb/hr  
Opacity – Visible emissions from the Roll Oven Stack shall not exceed an  
opacity of 10% on a 6 minute block average basis, except for no more than  
one (1) six (6) minute block average in a 3 hour period.

Periodic monitoring for the Roll Oven 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.

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

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

5

E. Boilers #1 & #2

Lepage operates Boiler #1 and #2 for heating. Each have a heat input of 1.68 MMBtu/hr firing natural gas.

Due to the size, the boilers are 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 units greater than 10 MMBtu/hr manufactured after June 9, 1989.

1. BACT for the boilers are based on the following:

Natural gas

PM/PM<sub>10</sub> – 0.05 lb/MMBtu based on 06-096 CMR 115

SO<sub>2</sub> – 0.6 lb/MMscf: AP-42, Table 1.4-2 (dated 7/98)

NO<sub>x</sub> – 100 lb/MMscf: AP-42, Table 1.4-1 (dated 7/98)

CO – 84 lb/MMscf: AP-42, Table 1.4-1 (dated 7/98)

VOC – 5.5 lb/MMscf: AP-42, Table 1.4-2 (dated 7/98)

Opacity – Visible emissions from Boilers #1 and #2 firing natural gas shall each not exceed an opacity of 10% on a 6 minute block average basis, except for no more than one (1) six (6) minute block average in a 3 hour period.

The BACT emission limits for the boilers are the following:

<u>Unit</u>	<u>PM</u> <u>(lb/hr)</u>	<u>PM<sub>10</sub></u> <u>(lb/hr)</u>	<u>SO<sub>2</sub></u> <u>(lb/hr)</u>	<u>NO<sub>x</sub></u> <u>(lb/hr)</u>	<u>CO</u> <u>(lb/hr)</u>	<u>VOC</u> <u>(lb/hr)</u>
Boiler #1 (1.68 MMBtu/hr) nat'l gas	0.08	0.08	0.01	0.16	0.13	0.01
Boiler #2 (1.68 MMBtu/hr) nat'l gas	0.08	0.08	0.01	0.16	0.13	0.01

2. Periodic Monitoring

Periodic monitoring for the boilers 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.

3. 40 CFR Part 63 Subpart JJJJJ

Boilers #1 and #2 are not subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional*

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

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

6

*Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ) because they fire natural gas.

F. BACT for VOC Bread Baking

Most bread products use the sponge dough process. In this process, flour, water, sugar and yeast are brought together and allowed to ferment for approximately 4 hours resulting in what is called the sponge. The dough is then made with the addition of other ingredients which sometimes includes additional yeast called the spike for which an additional spike fermentation time is included. The total baker's percent of yeast in the sponge dough process is often in the range of 3-5% or higher.

Lepage uses a new baking method which allows the baker to reduce the amount of baker's percent yeast and yeast action time; a pollution reduction technology through process modification. This is called the "liquid brew" or "water brew" method. In this method water, yeast and sugar are allowed to set for approximately 40 minutes before being added directly to the flour and other ingredients. The total fermentation time for this process can be reduced to approximately 1 hour.

The American Institute of Baking (AIB) conducted an independent evaluation of emission test data used by the EPA in development of the AP-42 emission factor for bakeries. The AIB findings were published in a technical bulletin entitled "*Bakery Oven Ethanol Emissions-Experimental and Plant Survey Results*". This bulletin detailed the driving factors in VOC emissions such as percent of yeast and fermentation time. In the case of this facility, the breads typically utilize 1.29% baker's yeast with a 56.5 minute yeast time and the rolls typically utilize 1.16% baker's yeast with a 59 minute yeast time. Based on this analysis, VOC emissions from bread baking using the water brew method at the Lepage Park Street operations were determined to be:

Product	AIB Emission Factor (lb/ton)
Bread	0.94
Rolls	0.91

Note: The emission factors in the above table are source specific based on the baker's percent of yeast in the sponge dough as well as the yeast time the facility uses.

As part of Lepage's 2007 license application, Lepage reviewed 4 VOC control options: thermal oxidation, adsorption, wet scrubbing, and changing the baking

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

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

7

process. Although a similar facility in Maine has been licensed with catalytic oxidizer, the other facility is much larger with a VOC emission limit of 39 tons per year after control. Based on the size of the Lepage facility and the proposed emissions, the Department accepts Lepage's proposal to track production and calculate VOC emissions based on production and emission factors for each type of product. No additional control is required at this time.

Lepage shall be limited to 39 tons of VOC per year for the entire facility. Total VOC emissions from the Bread Oven and the Roll Oven combined shall be limited to 38.52 tons of VOC per year on a 12 month rolling average basis. These emissions shall be calculated on a monthly basis from the production data from each line, and multiplied by the emission factors listed above.

Total VOC emissions from the process ovens shall be calculated as follows:

*Total VOC per month* = [(tons of bread produced/month x 0.94 lb of VOC /ton of bread) + (tons of rolls produced/month x 0.91 lb of VOC /ton of rolls)] ÷ (2000 lbs/ton)

Periodic monitoring:

Production from each oven shall be tracked documenting the type and quantity of product put through the Bread Oven and the Roll Oven. Based on the production numbers and emission factors, the total VOC emissions shall be calculated on a monthly and a 12 month rolling total basis.

G. Emergency Generator #1

Lepage operates an emergency generator. The emergency generator is rated at 8.75 MMBtu/hr and fires diesel fuel. The generator was manufactured in 2006 and installed in 2007.

1. BACT Findings

The BACT emission limits for the generator are based on the following:

Generator #1 emission limits

PM/PM<sub>10</sub> – 0.12 lb/MMBtu; based on 06-096 CMR 115, BACT;  
1.05 lb/hr

SO<sub>2</sub> –based on firing 0.0015% sulfur, 0.0015 lb/MMBtu; 0.01 lb/hr

NO<sub>x</sub> – 1.33 lb/MMBtu; BACT - 4.0 grams/bhp-hr based on vendor data;  
11.66 lb/hr

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

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

8

CO – 0.87lb/MMBtu 2.61 grams/bhp-hr based on US EPA Non-road Tier 2; 7.61 lb/hr  
VOC – 0.09 lb/MMBtu, AP-42, Table 3.4-1 (dated 10/96); 0.76 lb/hr  
Opacity – Visible emissions from the diesel generator shall not exceed 20% opacity on a 6 minute block average, except for no more than two (2) six (6) minute block averages in a 3 hour period.

The emergency generator shall be limited to 500 hours of operation per year, based on a 12 month rolling total. Lepage shall keep records of the hours of operation for the unit.

2. 40 CFR Part 60, Subpart IIII

The federal regulation 40 CFR Part 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE)* is applicable to the emergency generator listed above since the unit was ordered after July 11, 2005 and manufactured after April 1, 2006. By meeting the requirements of Subpart IIII, the unit also meets the requirements found in the *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 CFR Part 63, Subpart ZZZZ.

Emergency Definition:

Emergency stationary internal combustion engine is defined in 40 CFR Part 60, Subpart IIII as any stationary internal combustion engine whose operation is limited to emergency situations and required testing and maintenance. Examples include stationary ICE 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 ICE used to pump water in the case of fire or flood, etc. Stationary CI ICE used to supply power to an electric grid or that supply power as part of a financial arrangement with another entity are not considered to be emergency engines.

40 CFR Part 60, Subpart IIII Requirements:

The generator shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in 40 CFR §60.4202. [40 CFR §60.4205(b)]

The diesel fuel fired in the generator shall not exceed 15 ppm sulfur (0.0015% sulfur). [40 CFR §60.4207(b)]

**Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)**

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

9

A non-resettable hour meter shall be installed and operated on the generator. [40 CFR §60.4209(a)]

The generator shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by Lepage that are approved by the engine manufacturer. Lepage may only change those emission-related settings that are permitted by the manufacturer. [40 CFR §60.4211(a)]

The generator shall be limited to 100 hours/year for maintenance and testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving or generating income or a financial arrangement with another entity). [40 CFR §60.4211(f)]

No initial notification is required for emergency engines. [40 CFR §60.4214(b)]

**H. Parts Washer**

The Parts Washer has a design capacity of 10 gallons. The Parts Washer is subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended) and records shall be kept documenting compliance.

**I. Annual Emissions**

Lepage has the following annual emissions based on the following:

- Licensed natural gas fired units operating 8,760 hours per year.
- Generator #1 limited to 500 hours of operation per year firing diesel with a maximum sulfur content of 15 ppm sulfur.
- Lepage is limited to a total of 39 tons of VOC per year for the entire facility. Total VOC emissions from the bread oven and the roll oven combined shall be limited to 38.52 tons of VOC per year on a 12 month rolling total basis.

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

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

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

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
Bread Oven (Combustion)	1.40	1.40	0.02	2.66	2.23	0.15
Roll Oven (Combustion)	0.61	0.61	0.01	1.17	0.98	0.06
Process emissions from Bread Oven and Roll Oven (Vents)	-	-	-	-	-	38.52
Boiler 1	0.37	0.37	0.01	0.7	0.59	0.04
Boiler 2	0.37	0.37	0.01	0.7	0.13	0.04
Generator #1	0.26	0.26	0.01	2.91	1.9	0.19
<b>Total TPY</b>	<b>3.0</b>	<b>3.0</b>	<b>0.06</b>	<b>8.1</b>	<b>6.3</b>	<b>39.0</b>

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 (CO<sub>2</sub>e).

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, Lepage is below the major source threshold of 100,000 tons of CO<sub>2</sub>e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

11

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

**III.AMBIENT AIR QUALITY ANALYSIS**

According to 06-096 CMR 115, the level of air quality analyses required for a minor new source shall be determined on a case-by case basis. Based on the information available in the file and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source.

**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-968-71-B-N subject to the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License 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

**Lepage Bakeries, Inc.**  
**d/b/a Lepage Bakeries, Inc. Park**  
**Street**  
**Androscoggin County**  
**Lewiston, Maine**  
**A-968-71-B-N/A (SM)**

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

12

- 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:

**Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)**

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

13

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 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

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

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

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) **Bread Oven**

- A. Lepage shall fire only natural gas in the Bread Oven [06-096 CMR 115, BACT]
- B. Compliance shall be demonstrated by fuel records from the supplier showing the quantity and type of the fuel delivered. Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 CMR 115, BACT]
- C. Emissions shall not exceed the following based on firing natural gas:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Bread Oven	PM	0.05	06-096 CMR 115, BACT

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

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	*VOC (lb/hr)
Bread Oven	0.32	0.32	0.01	0.61	0.51	0.03

*\*VOC's from fuel firing only and number does not include process emissions*

- E. Visible emissions from the Bread Oven firing natural gas shall not exceed 10% opacity on a 6 minute block average basis, except for no more than one (1) six (6) minute block average in a 3 hour period. [06-096 CMR 101]

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

15

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

**(17) Roll Oven**

- A. Lepage shall fire only natural gas in the Roll Oven [06-096 CMR 115, BACT]
- B. Compliance shall be demonstrated by fuel records from the supplier showing the quantity and type of the fuel delivered. Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 CMR 115, BACT]
- C. Emissions shall not exceed the following:

<b>Emission Unit</b>	<b>Pollutant</b>	<b>lb/MMBtu</b>	<b>Origin and Authority</b>
Boiler #	PM	0.05	06-096 CMR 115, BACT

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

<b>Emission Unit</b>	<b>PM (lb/hr)</b>	<b>PM<sub>10</sub> (lb/hr)</b>	<b>SO<sub>2</sub> (lb/hr)</b>	<b>NO<sub>x</sub> (lb/hr)</b>	<b>CO (lb/hr)</b>	<b>*VOC (lb/hr)</b>
Boiler #1	0.14	0.14	0.01	0.27	0.22	0.01

*\*VOC's from fuel firing only and number does not include process emissions*

- E. Visible emissions from the Roll Oven firing natural gas shall not exceed 10% opacity on a 6 minute block average basis, except for no more than one (1) six (6) minute block average in a 3 hour period. [06-096 CMR 101]
- (18) Boilers #1 and #2**

- A. Lepage shall fire only natural gas in Boilers #1 and #2. [06-096 CMR 115, BACT]
- B. Compliance shall be demonstrated by fuel records from the supplier showing the quantity and type of the fuel delivered. Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 CMR 115, BPT]
- C. Emissions shall not exceed the following:

<b>Unit</b>	<b>Pollutant</b>	<b>lb/MMBtu</b>	<b>Origin and Authority</b>
Boiler #1	PM	0.05	06-096 CMR 115, BACT
Boiler #2	PM	0.05	06-096 CMR 115, BACT

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

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

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

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM<sub>10</sub> (lb/hr)</u>	<u>SO<sub>2</sub> (lb/hr)</u>	<u>NO<sub>x</sub> (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
Boiler #1 (1.68 MMBtu/hr) natural gas	0.08	0.08	0.01	0.16	0.13	0.01
Boiler #2 (1.68 MMBtu/hr) natural gas	0.08	0.08	0.01	0.16	0.13	0.01

E. Visible Emissions

Visible emissions from each boiler firing natural gas shall not exceed 10% opacity on a 6 minute block average basis, except for no more than one (1) six (6) minute block average in a 3 hour period. [06-096 CMR 101]

(19) **Emergency Generator #1**

A. The generator is limited to 500 hours per year total of operation, based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours. [06-096 CMR 115]

B. Emissions shall not exceed the following:

<u>Unit</u>	<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>Origin and Authority</u>
Generator #1	PM	0.12	06-096 CMR 115, BACT

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

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM<sub>10</sub> (lb/hr)</u>	<u>SO<sub>2</sub> (lb/hr)</u>	<u>NO<sub>x</sub> (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
Generator #1 (8.75 MMBtu/hr) Diesel	0.44	0.44	0.01	11.66	7.61	0.76

D. Visible emissions from the diesel generator shall each not exceed 20% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period. [06-096 CMR 101]

**Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)**

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

17

- E. The Emergency Generator shall meet the applicable requirements of 40 CFR Part 60, Subpart IIII, including the following:
1. The generator shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in §60.4202. [40 CFR §60.4205(b)]
  2. The diesel fuel fired in the generator shall not exceed 15 ppm sulfur (0.0015% sulfur). Compliance with the fuel sulfur content limit shall be based on fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [40 CFR §60.4207(b) and 06-096 CMR 115]
  3. A non-resettable hour meter shall be installed and operated on the generator. [40 CFR §60.4209(a)]
  4. The generator shall be limited to 100 hours/year for maintenance and testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving or generating income or a financial arrangement with another entity). These limits are based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours. [40 CFR §60.4211(f) and 06-096 CMR 115]
  5. The generator shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by Lepage that are approved by the engine manufacturer. Lepage may only change those emission-related settings that are permitted by the manufacturer. [40 CFR §60.4211(a)]

**(20) VOC Emission Limits**

- A. Lepage shall be limited to 39 tons of VOC per year for the entire facility. Total VOC emissions from the Bread Oven and the Roll Oven combined shall be limited to 38.52 tons of VOC per year on a 12 month rolling total basis. These emissions shall be calculated on a monthly basis from the production data from each line, and multiplied by the following emission factors:

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

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

18

Product	AIB Emission Factor (lb/ton)
Bread	0.94
Rolls	0.91

Total VOC emissions for the process ovens shall be calculated as follows:

$$\text{Total VOC per month} = [(\text{tons of bread produced/month} \times 0.94 \text{ lb of VOC /ton of bread}) + (\text{tons of rolls produced/month} \times 0.91 \text{ lb of VOC /ton of rolls})] \div (2000 \text{ lbs/ton})$$

B. Recordkeeping:

1. Lepage shall keep records of production amounts from each oven documenting the type and quantity of product put through the Bread Oven, and the Roll Oven. [06-096 CMR 115, BACT]
2. Total VOC emissions shall be calculated based on the production numbers and the product specific emission factors. The total VOC emission shall be calculated on a monthly and a 12 month rolling total basis. [06-096 CMR 115, BACT]

(21) **Parts Washers**

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

- A. Lepage 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 [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. Lepage shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
  - (i) Waste solvent shall be collected and stored in closed containers.
  - (ii) 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.
  - (iii) 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.
  - (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
  - (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.
  - (vi) 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.
  - (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
  - (viii) Work area fans shall not blow across the opening of the degreaser unit.
  - (ix) 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. [06-096 CMR 130]

(22) **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:

- 1) A computer program and accompanying instructions supplied by the Department; or
- 2) 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.

Lepage Bakeries, Inc.  
d/b/a Lepage Bakeries, Inc. Park  
Street  
Androscoggin County  
Lewiston, Maine  
A-968-71-B-N/A (SM)

20

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

- (23) Lepage 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 22 DAY OF January, 2013.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Maia Allen Robert Core for  
PATRICIA W. AHO, COMMISSIONER

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

[Note: If a complete renewal application, as determined by the Department, is submitted prior to expiration, 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 renewal of the license.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 5/18/2012

Date of application acceptance: 6/6/2012

Date filed with the Board of Environmental Protection:

This Order prepared by Lisa P. Higgins, Bureau of Air Quality.

