



DEPARTMENT ORDER

**Daaquam Lumber Maine, Inc.
Aroostook County
Masardis, Maine
A-165-70-H-R**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Renewal**

FINDINGS OF FACT

After review of the Part 70 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 (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Daaquam Lumber Maine, Inc.
LICENSE TYPE	Part 70 License Renewal
NAICS CODES	321113
NATURE OF BUSINESS	Lumber Manufacturer
FACILITY LOCATION	Rt 11, Masardis, Maine

As per a letter to the Department dated August 22, 2018, the name of the lumber mill in Masardis, Maine previously licensed as Maibec Lumber Inc. has changed to Daaquam Lumber Maine, Inc. The name change will be reflected in this license.

Daaquam Lumber Maine, Inc. (Daaquam), is a lumber manufacturing facility consisting of two biomass boilers, six drying kilns, and a fire pump.

Daaquam has the potential to emit more than 100 tons per year (TPY) of carbon monoxide (CO) and 50 TPY of volatile organic compounds (VOC); therefore, the source is a major source for criteria pollutants. Daaquam does not have the potential to emit 10 TPY or more of a single hazardous air pollutant (HAP) or 25 TPY or more of combined HAP; therefore, the source is an area source for HAP.

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

Boilers

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Max. Firing Rate (ton/hr)	Fuel Type	Manufacture Date	Install. Date	Stack #
Boiler #1	27.0	3.0	Biomass	1979	1979	1
Boiler #2*	12.2	1.4	Biomass	1980	1993	2

*Formerly designated Boiler #3

Stationary Engine

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Max. Firing Rate (gal/hr)	Output (hp)	Fuel Type, % sulfur	Mfr. Date	Install. Date	Stack
Fire Pump #1	1.8	13.0	255	Distillate fuel, 0.0015%	1974	1975	Fire Pump Stack

Process Equipment

Equipment	Production Rate
Drying Kilns (6)	152 million board feet/year
Gasoline Storage Tank	3,000 gallon capacity
Parts Washers	N/A

Daaquam has additional insignificant activities which do not need to be listed in the emission equipment tables above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

Daaquam was previously licensed to operate a Finger Jointer Line. This has been dismantled, and portions of it have been sold off. Daaquam has no immediate plans to operate a Finger Jointer Line at the mill and has requested its removal from their Part 70 air emission license. In addition, the former owner of the Mill (Maibec Lumber) was previously licensed to install and operate a seventh drying kiln. Daaquam currently does

not plan to install a new kiln in the near future, and therefore the previously licensed Kiln #7 has been excluded from this license.

C. Definitions

Distillate Fuel. For the purposes of this license, *distillate fuel* means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;
- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

D. Application Classification

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

The application for Daaquam does not include the licensing of increased emissions or the installation of new or modified equipment; therefore, the license is considered to be a Part 70 License renewal issued under *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 140.

E. General Facility Requirements

Daaquam is subject to the following state and federal regulations listed below, in addition to the regulations listed for specific units as described further in this license.

CITATION	REQUIREMENT TITLE
06-096 C.M.R. ch. 101	Visible Emissions Regulation
06-096 C.M.R. ch. 102	Open Burning
06-096 C.M.R. ch. 103	Fuel Burning Equipment Particulate Emission Standard
06-096 C.M.R. ch. 106	Low Sulfur Fuel Regulation
06-096 C.M.R. ch. 109	Emergency Episode Regulations
06-096 C.M.R. ch. 110	Ambient Air Quality Standards
06-096 C.M.R. ch. 116	Prohibited Dispersion Techniques
06-096 C.M.R. ch. 130	Solvent Cleaners
06-096 C.M.R. ch. 137	Emission Statements
06-096 C.M.R. ch. 140	Part 70 Air Emission License Regulations
06-096 C.M.R. ch. 144	National Emission Standards for Hazardous Air Pollutants
40 C.F.R. Part 63, Subpart ZZZZ	National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

CITATION	REQUIREMENT TITLE
40 C.F.R. Part 63, Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
40 C.F.R. Part 70	State Operating Permit Programs

Note: C.M.R. = Code of Maine Regulations
C.F.R. = Code of Federal Regulations

F. Units of Measurement

The following units of measurement are used in this license:

BF	board feet
gal/hr	gallons per hour
hp	horsepower
lb/hr	pounds per hour
lb/MMBtu	pounds per million British Thermal Units
MMBF	million board feet
MMBF/yr	million board feet per year
MMBtu/hr	million British Thermal Units per hour
mmHg	millimeter of mercury
ppm	parts per million
ppmv	parts per million by volume
psig	pounds per square inch guage
ton/hr	tons per hour
tons/year or tpy	tons per year

II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

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 emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. VOC RACT (Reasonably Available Control Technology)

Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds, 06-096 C.M.R. ch. 134 (VOC RACT) is applicable to sources that have the potential to emit quantities of VOC equal to or greater than 40 tons/year. Boilers #1 and #2 are exempted in determining Daaquam's total VOC emissions per 06-096 C.M.R. ch. 134 § 1(C)(4). The drying kilns are exempted per 06-096 C.M.R. ch. 134 § 1(C)(6). Therefore, 06-096 C.M.R. ch. 134 is not applicable to this facility.

C. Compliance Assurance Monitoring (CAM)

Compliance Assurance Monitoring, 40 C.F.R. Part 64 is applicable to units at major sources if the unit has emission limits, a control device to meet the limits, and pre-control emissions greater than 100 tons/year for any pollutant. Boilers #1 and #2 have emission limits for particulate matter (PM) which are met through the use of a cyclone/multiclone. However, the pre-control emissions of PM for each of these boilers is less than 100 tons/year. Therefore, 40 C.F.R. Part 64 is not applicable to this facility.

D. Fuel Sulfur Content Requirements

Daaquam is licensed to fire distillate fuel which, by definition, has a sulfur content of 0.5% or less by weight. Per 38 M.R.S. § 603-A(2)(A)(3), as of July 1, 2018, no person shall import, distribute, or offer for sale any distillate fuel with a sulfur content greater than 0.0015% by weight (15 ppm). Therefore, the distillate fuel purchased or otherwise obtained for use at this facility shall not exceed 0.0015% by weight (15 ppm).

E. Boiler #1

Boiler #1 was manufactured by Industrial Boiler Co., Inc. and installed in 1979. It has a designed heat input capacity of 27.0 MMBtu/hr and is used for heating the drying kilns.

Boiler #1 is licensed to fire biomass which includes bark, wood chips, and sawdust.

Boiler #1 may also burn petroleum soaked material (oily rags, shop wipes, absorbent pads, oil/kerosene soaked sawdust, etc.) which is generated on-site, and cardboard generated on-site from the receipt of goods and supplies. Daaquam shall keep track of the estimated amount of petroleum product (in gallons) fired at the facility from the burning of petroleum soaked material.

Biomass heat input values listed in this license are based on an equivalent of 50% moisture, by weight. Daaquam shall use the following formula for converting fuel use records to 50% moisture, by weight:

Tons Wood at 50% = (Tons Wood at M%) x [(100-M)/50]

Where M = the actual moisture content of the wood as-fired

Emissions exit through Stack #1, which has an inside diameter of 2.67 feet and above ground level (AGL) height of 105 feet.

1. New Source Performance Standards (NSPS)

Due to its date of manufacture, Boiler #1 is not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Dc. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more that are constructed after June 9, 1989.

2. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

Boiler #1 is subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ. It is considered an existing biomass-fired boiler. Applicable Subpart JJJJJ requirements are addressed in section II.G of this license, titled National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJ.

Because Daaquam is not a major HAP source, Boiler #1 is not subject to *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, 40 C.F.R. Part 63, Subpart DDDDD.

3. Control Equipment

Emissions of PM are controlled by a multicyclone.

4. Emission Limits and Streamlining

For Boiler #1, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standard(s)	Origin and Authority	Licensed Emission Limit(s)
PM	0.47 lb/MMBtu	06-096 C.M.R. ch. 103, § 2(A)(3)(a)	0.30 lb/MMBtu *
	0.30 lb/MMBtu	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	
	8.10 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	8.10 lb/hr
PM ₁₀	8.10 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	8.10 lb/hr
SO ₂	0.23 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	0.23 lb/hr
NO _x	4.50 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	4.50 lb/hr
CO	40.80 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	40.80 lb/hr
VOC	0.66 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	0.66 lb/hr

Table Notes: * streamlining requested

Visible emissions from Boiler #1 shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time the unit operator may elect to comply with the following work practice requirements in lieu of the visible emission standard:

- a. The unit operator shall maintain a log (written or electronic) of the date, time, and duration of all startups and shutdowns and malfunctions of any unit or its associated air pollution control equipment;
- b. The unit operator shall develop and implement a written startup and shutdown plan;
- c. The duration of unit startups, shutdowns, or malfunctions shall each not exceed one hour per occurrence, unless otherwise defined and provided for in the facility's air emission license; and
- d. The unit, including any associated air pollution control equipment, shall be operated at all times in a manner consistent with safety and good air pollution control

practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Department that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the unit.

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

5. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boiler #1 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

6. Periodic Monitoring

Daaquam shall monitor and record values for Boiler #1 and its associated air pollution control equipment as indicated in the following table:

Boiler #1			
Value	Units of Measure	Monitoring Tool/Method	Frequency
Biomass use	Tons	Conveyor belt scales	Monthly and 12-month rolling total
Petroleum product fired	Gallons	Operations log	Monthly and 12-month rolling total
Maintenance activity	Each	Maintenance log	Maintain records documenting maintenance activities performed on the boiler and multicyclone

7. Parameter Monitors

There are no Parameter Monitors required for Boiler #1.

8. CEMS and COMS

No continuous emission monitoring systems (CEMS) or continuous opacity monitoring systems (COMS) are required for Boiler #1. Boiler #1 is equipped with a non-spec opacity monitor. The non-spec opacity monitor is not to be used to demonstrate compliance with the opacity limit. It is used as an operational tool only.

F. Boiler #2

Boiler #2 was manufactured by Industrial Boiler Co., Inc. in 1980 and installed at Daaquam in 1993. It has a designed heat input capacity of 12.2 MMBtu/hr and is used for heating the buildings and the hot pond. This boiler was previously licensed as Boiler #3. Daaquam has requested the designation be changed in this license.

Boiler #2 is licensed to fire biomass which includes bark, wood chips, and sawdust.

Boiler #2 may also burn petroleum soaked material (oily rags, shop wipes, absorbent pads, oil/kerosene soaked sawdust, etc.) which is generated on-site, and cardboard generated on-site from the receipt of goods and supplies. Daaquam shall keep track of the estimated amount of petroleum product (in gallons) fired at the facility from the burning of petroleum soaked material.

Biomass heat input values listed in this license are based on an equivalent of 50% moisture, by weight. Daaquam shall use the following formula for converting fuel use records to 50% moisture, by weight:

$$\text{Tons Wood at 50\%} = (\text{Tons Wood at M\%}) \times [(100-M)/50]$$

Where M = the actual moisture content of the wood as-fired

Emissions exit through Stack #2, which has an inside diameter of 2.25 feet and above ground level (AGL) height of 53 feet.

1. New Source Performance Standards (NSPS)

Due to its date of manufacture, Boiler #2 is not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Dc. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more that are constructed after June 9, 1989.

2. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

Boiler #2 is subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ. It is considered an existing biomass-fired boiler. Applicable Subpart JJJJJ requirements are addressed in section II.G of this license, titled National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJ.

Because Daaquam is not a major HAP source, Boiler #2 is not subject to *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, 40 C.F.R. Part 63, Subpart DDDDD.

3. Control Equipment

Emissions of PM are controlled by a multiclone.

4. Emission Limits and Streamlining

For Boiler #2, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standard(s)	Origin and Authority	Licensed Emission Limit(s)
PM	0.30 lb/MMBtu	06-096 C.M.R. ch. 103, § 2(B)(4)(A)	0.30 lb/MMBtu
	3.66 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	3.66 lb/hr
PM ₁₀	3.66 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	3.66 lb/hr
SO ₂	0.10 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	0.10 lb/hr
NO _x	2.03 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	2.03 lb/hr
CO	18.44 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	18.44 lb/hr
VOC	0.30 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	0.30 lb/hr

Visible emissions from Boiler #2 shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which

time the unit operator may elect to comply with the following work practice requirements in lieu of the visible emission standard:

- a. The unit operator shall maintain a log (written or electronic) of the date, time, and duration of all startups and shutdowns and malfunctions of any unit or its associated air pollution control equipment;
- b. The unit operator shall develop and implement a written startup and shutdown plan;
- c. The duration of unit startups, shutdowns, or malfunctions shall each not exceed one hour per occurrence, unless otherwise defined and provided for in the facility's air emission license; and
- d. The unit, including any associated air pollution control equipment, shall be operated at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Department that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the unit.

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

5. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boiler #2 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

6. Periodic Monitoring

Daaquam shall monitor and record values for Boiler #2 and its associated air pollution control equipment as indicated in the following table:

Boiler #2			
Value	Units of Measure	Monitoring Tool/Method	Frequency
Biomass fuel use	Tons	Conveyor belt scales	Monthly and 12-month rolling total
Petroleum product fired	Gallons	Operations log	Monthly and 12-month rolling total
Maintenance activity	Each	Maintenance log	Maintain records documenting maintenance activities performed on the boiler and cyclone

7. Parameter Monitors

There are no Parameter Monitors required for Boiler #2.

8. CEMS and COMS

No CEMS or COMS are required for Boiler #2. Boiler #2 is equipped with a non-spec opacity monitor. The non-spec opacity monitor is not to be used to demonstrate compliance with the opacity limit. It is used as an operational tool only.

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

Boilers #1 and #2 are subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ. The units are considered existing biomass boilers.

A summary of the currently applicable federal 40 C.F.R. Part 63, Subpart JJJJJ requirements is listed below. Notification forms and additional rule information can be found on the following website: <https://www.epa.gov/stationary-sources-air-pollution/compliance-industrial-commercial-and-institutional-area-source>.

1. Compliance Dates, Notifications, and Work Practice Requirements

a. Initial Notification of Compliance

An Initial Notification submittal to EPA was due no later than January 20, 2014. [40 C.F.R. § 63.11225(a)(2)] Daaquam submitted their Initial Notification to EPA on September 6, 2011.

b. Boiler Tune-Up Program

(1) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]

(2) Each tune-up shall be conducted at a frequency of every two years. [40 C.F.R. § 63.11223(a) and Table 2]

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

(i) 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. [40 C.F.R. § 63.11223(b)(1)]

- (ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]
 - (iii) 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. [40 C.F.R. § 63.11223(b)(3)]
 - (iv) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
 - (v) 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 C.F.R. § 63.11223(b)(5)]
 - (vi) 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 C.F.R. § 63.11223(b)(7)]
- (4) Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:
- (i) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
 - (ii) A description of any corrective actions taken as part of the tune-up of the boiler; and
 - (iii) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]
- (5) After conducting the initial boiler tune-up, a Notification of Compliance Status was to be submitted to EPA no later than July 19, 2014. [40 C.F.R. § 63.11225(a)(4) and 40 C.F.R. § 63.11214(b)] Daaquam submitted their Notification of Compliance Status to EPA on May 21, 2014.

c. Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must

include the items contained in §§ 63.11225(b)(1) and (2), including the following:
[40 C.F.R. § 63.11225(b)]

- (1) Company name and address;
- (2) A statement of whether the source has complied with all the relevant requirements of this Subpart;
- (3) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
- (4) The following certifications, as applicable:
 - (i) "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
 - (ii) "No secondary materials that are solid waste were combusted in any affected unit."
 - (iii) "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

d. Energy Assessment

Daaquam is subject to the energy assessment requirement as follows:

- (1) 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 C.F.R. § 63.11196(a)(3)] Daaquam conducted their one-time energy assessment on January 22, 2014.
- (2) A Notification of Compliance Status was required to be submitted to EPA no later than July 19, 2014. [40 C.F.R. § 63.11225(a)(4) and 40 C.F.R. § 63.11214(c)] Daaquam submitted their Notification of Compliance Status to EPA on May 21, 2014.

2. Recordkeeping

Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJ including the following [40 C.F.R. § 63.11225(c)]:

- a. Copies of notifications and reports with supporting compliance documentation;
- b. 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;

- c. Records of the occurrence and duration of each malfunction of each applicable boiler; and
- d. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

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 C.F.R. § 63.11225(a)(4)(vi)]

H. Drying Kilns

Daaquam utilizes six kilns to dry lumber before sale. Heat for the kilns is provided by Boiler #1.

Daaquam predominantly dries red spruce. Daaquam's Air Emission License Amendment A-165-70-C-A established a kiln through-put restriction of 152 MMBF/yr. Using a factor of 1.283 pounds of VOC released in the kiln drying process for every 1,000 BF dried, Daaquam is restricted to an annual VOC emission limit from kiln operations of no greater than 97.5 tons of VOC per year based on a twelve-month rolling total.

Also in Air Emission License Amendment A-165-70-C-A (January 10, 2007), Daaquam accepted a through-put restriction of 152 MMBF/yr to limit the facility's emissions of a single HAP (methanol) to 9.9 tpy and total HAP emissions to less than 24.9 tpy.

Periodic Monitoring

Daaquam shall monitor and record values for the kilns as indicated in the following table whenever the equipment is operating.

Kilns #1-#7			
Value	Units of Measure	Monitoring Tool/Method	Frequency
Quantity of wood dried	BF	Production Records	Monthly & 12-month rolling total

I. Fire Pump #1

Daaquam operates one fire pump. The fire pump has an engine rated at 1.8 MMBtu/hr which fires distillate fuel. The fire pump was manufactured in 1974.

1. New Source Performance Standards (NSPS)

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

2. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 C.F.R. Part 63, Subpart ZZZZ is applicable to Fire Pump #1. The unit is considered an existing, emergency stationary reciprocating internal combustion engine (RICE) at an area HAP source and is not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE*) specifically does not exempt these units from the federal requirements.

a. Emergency Engine Designation and Operating Criteria

Under Subpart ZZZZ, a stationary reciprocating internal combustion engine (RICE) is considered an **emergency** stationary RICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under Subpart ZZZZ, resulting in the engine being subject to requirements applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster or equipment failure;

- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

- (i) An emergency engine may be operated for a maximum of 100 hours per calendar year for 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 more than 100 hours per calendar year.
- (ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, 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.

Fire Pump #1 shall be limited to the usage outlined in 40 C.F.R. § 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 C.F.R. § 63.6640(f) may cause this engine to not be considered an emergency engine and therefore subject to all applicable requirements for non-emergency engines.

b. 40 CFR Part 63, Subpart ZZZZ Requirements

(1) Operation and Maintenance Requirements

	Operating Limitations
Compression ignition (distillate fuel) units: Fire Pump #1	<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 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

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

(2) Optional Oil Analysis Program

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

(3) Non-Resettable Hour Meter Requirement

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

(4) Startup Idle and Startup Time Minimization Requirements

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

(5) Annual Time Limit for Maintenance and Testing

As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, 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). [40 C.F.R. § 63.6640(f)]

(6) Recordkeeping

Daaquam shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 63.6655(f)]

3. Emission Limits and Streamlining

For Fire Pump #1, a listing of potentially applicable emission standards, the origin and authority of the standards, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standard(s)	Origin and Authority	Licensed Emission Limit(s)
PM	0.55 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-G-A, issued 10/3/2017)	0.55 lb/hr
PM ₁₀	0.55 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-G-A, issued 10/3/2017)	0.55 lb/hr
NO _x	7.76 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-G-A, issued 10/3/2017)	7.76 lb/hr
CO	1.67 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-G-A, issued 10/3/2017)	1.67 lb/hr
VOC	0.62 lb/hr	06-096 C.M.R. ch. 140, BPT (A-165-70-G-A, issued 10/3/2017)	0.62 lb/hr
Visible Emissions	No greater than 20% opacity on a 6-min block average basis	06-096 C.M.R. ch. 140, BPT (A-165-70-G-A, issued 10/3/2017)	No greater than 20% opacity on a 6-min block average basis

Table Notes: % S = percent fuel sulfur, by weight

4. Emission Limit Compliance Methods

Compliance with the emission limits associated with Fire Pump #1 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

5. Periodic Monitoring

Daaquam shall monitor and record values for Fire Pump #1 as indicated in the following table.

Value	Units of Measure	Monitoring Tool/Method	Frequency
Fuel oil sulfur content	Percent, by weight	Fuel receipts from supplier	As fuel is purchased
Operating time	Hours	Hour Meter	Monthly and Calendar year total
Type of Operation (emergency, maintenance, etc.)	N/A	Recorded electronically or in logbook	As occurs

6. Parameter Monitors

There are no Parameter Monitors required for Fire Pump #1.

7. CEMS and COMS

There are no CEMS or COMS required for Fire Pump #1.

J. Gasoline Storage

Daaquam has a 3,000 gallon tank used to store gasoline for company vehicles. Daaquam is subject to and shall comply with applicable requirements of 06-096 C.M.R. ch. 118, *Gasoline Dispensing Facilities Vapor Control*.

1. The fill pipe shall extend within six inches of the bottom of the gasoline storage tank.
2. Daaquam shall maintain records of gasoline throughput on a monthly and annual basis.

[06-096 C.M.R. ch. 118]

K. Parts Washers

Daaquam operates parts washers for maintenance needs. Based on the solvent used, the parts washers are subject to *Solvent Degreasers*, 06-096 C.M.R. ch. 130.

Periodic monitoring for the parts washers shall consist of recordkeeping including records of solvent added.

L. Emissions Statement

Daaquam is subject to emissions inventory requirements contained in *Emission Statements*, 06-096 C.M.R. ch. 137. Daaquam shall maintain the following records in order to comply with this rule:

1. The amount of distillate fuel fired in Fire Pump #1;
2. The amount of wood fired (at 50% moisture) in Boilers #1 and #2 on a monthly basis;
3. The sulfur content of the distillate fuel fired in Fire Pump #1;
4. Kiln throughput on a monthly basis;
5. Calculations of the VOC and/or HAP emissions from the Drying Kilns on a calendar year total basis; and
6. Hours of operation for each emission unit on an annual basis.

In reporting year 2020 and every third year thereafter, Daaquam shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). The Department will use these reports to calculate and invoice for the applicable annual air quality surcharge for the subsequent three billing periods. Daaquam shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3). [38 M.R.S. § 353-A(1-A)]

M. Facility Annual Emissions

1. Total Annual Emissions

Daaquam is licensed for the following annual emissions, based on a 12-month rolling total. The tons per year limits were calculated based on operation of Boilers #1 and #2 for 8,760 hours per year firing wood with a moisture content of 50%; operation of Fire Pump #1 for 100 hours per year; and maximum throughput in the kilns of 152 MMBF/yr.

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

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boiler #1	35.5	35.5	1.0	19.7	178.7	2.9
Boiler #2	16.0	16.0	0.4	8.9	80.8	1.3
Fire Pump #1	--	--	--	0.4	0.1	--
Kilns	--	--	--	--	--	97.5
Total TPY	51.5	51.5	1.4	29.0	259.6	101.7

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

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 C.F.R. Part 52, Subpart A, § 52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 C.M.R. ch. 100, 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).

The quantity of CO₂e emissions from this facility is less than 100,000 tons per year, based on the following:

- the facility's operating limitations;
- worst case emission factors from the following sources: U.S. EPA's AP-42, the Intergovernmental Panel on Climate Change (IPCC), and *Mandatory Greenhouse Gas Reporting*, 40 C.F.R. Part 98; and
- global warming potentials contained in 40 C.F.R. Part 98.

No additional licensing actions to address GHG emissions are required at this time.

III. AMBIENT AIR QUALITY ANALYSIS

Daaquam previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (see license A-165-70-A-I, issued on 3/15/2001). An additional ambient air quality analysis is not required for this Part 70 License.

ORDER

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

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

The Department hereby grants the Part 70 License A-165-70-H-R pursuant to 06-096 C.M.R. ch. 140 and the preconstruction permitting requirements of 06-096 C.M.R. ch. 115 and subject to the standard and specific conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Daaquam pursuant to the Department's preconstruction permitting requirements have been incorporated into this Part 70 license, except for such conditions that the Department has determined are obsolete, extraneous, or otherwise environmentally insignificant, as explained in the Findings of Fact accompanying this Order. As such, the conditions in this license supersede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 for making such changes and pursuant to the applicable requirements in 06-096 C.M.R. ch. 140.

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

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 STATEMENTS

- (1) 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 C.M.R. ch. 140]
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [06-096 C.M.R. ch. 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 C.M.R. ch. 140]
- (4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license; [06-096 C.M.R. ch. 140]

- (5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 C.M.R. ch. 140]
- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
- A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or affect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated November 21, 2017.

Permit Shield Table

Source	Citation	Description	Basis for Determination
Facility	06-096 C.M.R. 134	VOC RACT	Non-exempt equipment emits less than 40 tpy.
Facility	06-096 C.M.R. 138	NO _x RACT	Facility emits less than 100 tpy of NO _x
All Boilers	40 C.F.R. Part 60, Subpart D	NSPS for Fossil-Fuel-Fired Steam Generators	Maximum heat input for each boiler less than 250 MMBtu/hr
All Boilers	40 C.F.R. Part 60, Subpart Db	NSPS for Industrial-Commercial-Institutional Steam Generating Units	Maximum heat input for each boiler less than 100 MMBtu/hr
All Boilers	40 C.F.R. Part 60, Subpart Dc	NSPS for Small Industrial-Commercial-Institutional Steam Generating Units	Each of these boilers commenced construction prior to June 9, 1989
Gasoline Storage	40 C.F.R. Part 60, Subparts K, Ka, and Kb	Storage Vessels for Petroleum Liquids	Tank capacity is less than 40,000 gallons.

Source	Citation	Description	Basis for Determination
All Boilers	40 C.F.R. Part 63, Subpart DDDDD	NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters	Facility is not a major source of HAP.
All Boilers	40 C.F.R. Part 64	Compliance Assurance Monitoring	Pre-control emissions less than 100 tpy.
Facility	40 C.F.R. Part 98	Mandatory Greenhouse Gas Reporting	Facility does not contain any source category listed in Tables A-3 or A-4 of the rule, and facility does not have the potential to emit more than 25,000 metric tons of CO _{2e}

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

- (7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of three or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to 06-096 C.M.R. ch. 140;
 - B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
 - C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
 - D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

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

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

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

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (38 M.R.S. § 347-C).
- (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 140. [06-096 C.M.R. ch. 140]
- (3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 C.M.R. ch. 140]
Enforceable by State-only
- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to 38 M.R.S. § 353-A.
- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 C.M.R. ch. 140]
Enforceable by State-only
- (6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license. [06-096 C.M.R. ch. 140]
- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [06-096 C.M.R. ch. 140]

- (8) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:
- A. Perform stack testing 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;
 - 2. To demonstrate compliance with the applicable emission standards; or
 - 3. 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 C.F.R. 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 C.M.R. ch. 140] **Enforceable by State-only**

- (9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates 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 C.F.R. 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 C.M.R. ch. 140] **Enforceable by State-only**

- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

- A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;
- B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

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

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

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

- (11) Upon the written request of the Department, the licensee shall establish and maintain such records; make such reports; install, use, and maintain such monitoring equipment; sample such emissions in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe; and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 C.M.R. ch. 140]

- (12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [06-096 C.M.R. ch. 140]
- (13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
- A. The identification of each term or condition of the Part 70 license that is the basis of the certification;
 - B. The compliance status;
 - C. Whether compliance was continuous or intermittent;
 - D. The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - E. Such other facts as the Department may require to determine the compliance status of the source.

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

SPECIFIC CONDITIONS

(14) **Boilers #1 and #2**

A. Allowable Fuels

Boilers #1 and #2 are licensed to fire biomass, petroleum soaked material (oily rags, shop wipes, absorbent pads, oil/kerosene soaked sawdust, etc.) generated on-site, and cardboard generated on-site from the receipt of goods and supplies.
[40 C.M.R. ch. 140, BPT]

B. Boiler #1 and #2 Emission Limits

1. Emissions from Boiler #1 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.30	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	8.10	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only

Pollutant	lb/hr	Origin and Authority	Enforceability
PM ₁₀	8.10	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only
SO ₂	0.23	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only
NO _x	4.50	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only
CO	40.80	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only
VOC	0.66	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only

2. Emissions from Boiler #2 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.30	06-096 C.M.R. ch. 103, § 2(B)(4)(a)	Federally Enforceable

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	3.66	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only
PM ₁₀	3.66	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only
SO ₂	0.10	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only
NO _x	2.03	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only
CO	18.44	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only
VOC	0.30	06-096 C.M.R. ch. 140, BPT (A-165-70-A-I, issued 3/15/2001)	Enforceable by State-Only

C. Visible emissions from Boilers #1 and #2 shall each not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time the unit operator may elect to comply with the following work practice requirements in lieu of the visible emission standard:

1. The unit operator shall maintain a log (written or electronic) of the date, time, and duration of all startups and shutdowns and malfunctions of any unit or its associated air pollution control equipment;
2. The unit operator shall develop and implement a written startup and shutdown plan;
3. The duration of unit startups, shutdowns, or malfunctions shall each not exceed one hour per occurrence, unless otherwise defined and provided for in the facility's air emission license; and
4. The unit, including any associated air pollution control equipment, shall be operated at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Department that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the unit.

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

D. Control Equipment

Daaquam shall control particulate matter emissions from Boilers #1 and #2 by use of multiclones and shall maintain records of all maintenance performed on each multiclone, as well as records documenting the nature of all failures and corrective actions taken. [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-Only**

E. Compliance Methods

Compliance with the emission limits listed above shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

[06-096 C.M.R. ch. 140] **Enforceable by State-Only**

F. Periodic Monitoring

Daaquam shall monitor and record values for Boilers #1 and #2 and its associated air pollution control equipment as indicated in the following table:
 [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-Only**

Boilers #1 and #2			
Value	Units of Measure	Monitoring Tool/Method	Frequency
Biomass fuel use	Tons	Conveyor belt scales	Monthly and 12-month rolling total
Petroleum product fired	Gallons	Operations log	Monthly and 12-month rolling total
Maintenance activity	Each	Maintenance log	Maintain records documenting maintenance activities performed on the boiler and cyclone

G. Federal Regulations

Daaquam shall meet all applicable requirements in 40 C.F.R. Part 63, Subpart JJJJJ including, but not limited to the following:

1. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]
 - a. Each tune-up shall be conducted at a frequency of every two years. [40 C.F.R. § 63.11223(a) and Table 2]
 - 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. [40 C.F.R. § 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 C.F.R. § 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. [40 C.F.R. § 63.11223(b)(3)]
 - (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 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 C.F.R. § 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 C.F.R. § 63.11223(b)(7)]

- c. Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:
 - (1) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
 - (2) A description of any corrective actions taken as part of the tune-up of the boiler; and
 - (3) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

2. Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following:
[40 C.F.R. § 63.11225(b)]

- a. Company name and address;
- b. A statement of whether the source has complied with all the relevant requirements of this Subpart;
- c. A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
- d. The following certifications, as applicable:
 - (1) "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
 - (2) "No secondary materials that are solid waste were combusted in any affected unit."
 - (3) "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the

manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

3. Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJ including the following [40 C.F.R. § 63.11225(c)]:
 - a. Copies of notifications and reports with supporting compliance documentation;
 - b. 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;
 - c. Records of the occurrence and duration of each malfunction of each applicable boiler; and
 - d. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

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 C.F.R. § 63.11225(a)(4)(vi)]

(15) Drying Kilns

- A. Daaquam shall be limited to drying no more than 152,000,000 BF (152 MMBF) of lumber per year in the facility's drying kilns based on a 12-month rolling total. [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-Only**
- B. Daaquam shall maintain records indicating the quantity of wood dried, in BF, and the VOC emissions. VOC emissions shall be calculated using an emission factor of 1.283 pounds of VOC per 1,000 BF. The kiln record shall be maintained on a monthly and 12-month rolling total basis. [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-Only**

(16) Fire Pump #1

- A. Allowable Operation and Fuels
 1. Fire Pump #1 is licensed to fire distillate fuel. [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-Only**
 2. Fire Pump #1 shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-Only**

B. Fuel Sulfur Content

1. The fuel oil sulfur content for Fire Pump #1 shall be limited to 0.0015% sulfur by weight. [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-Only**
2. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-Only**

C. Emissions shall not exceed the following limits [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-Only:**

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Fire Pump #1 (1.8 MMBtu/hr) Distillate fuel	0.55	0.55	--	7.76	1.67	0.62

D. Visible Emissions

Visible emissions from Fire Pump #1 shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 140, BPT]

E. Fire Pump #1 shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following:

1. Daaquam shall meet the following operational limitations for the compression ignition emergency engine (Fire Pump #1):
 - a. Change the oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c. Inspect the hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Records shall be maintained documenting compliance with the operational limitations.

[40 C.F.R. § 63.6603(a) and Table 2(d); and 06-096 C.M.R. ch. 140, BPT]

2. Oil Analysis Program Option

Daaquam has the option of utilizing an oil analysis program which complies with the requirements of § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, Daaquam must keep records of the parameters

that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 C.F.R. § 63.6625(i)]

3. **Non-Resettable Hour Meter**

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

4. **Maintenance, Testing, and Non-Emergency Operating Situations**

a. The engine shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, 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). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written logs) of all engine operating hours. [40 C.F.R. § 63.6640(f) and 06-096 C.M.R. ch. 140, BPT]

b. Daaquam shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. §§ 63.6655(e) and (f)]

5. **Operation and Maintenance**

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

6. **Startup Idle and Startup Time Minimization**

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

(17) **Gasoline Storage Tanks**

A. The fill pipe shall extend within six inches of the bottom of the gasoline storage tank.
[06-096 C.M.R. ch. 118]

- B. The licensee shall maintain records of gasoline throughput on a monthly and annual basis. [06-096 C.M.R. ch 118]

(18) **Parts Washers**

Parts washers at Daaquam are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130.

- A. Daaquam shall keep records of the amount of solvent added to each parts washer. [06-096 C.M.R. ch. 140, BPT]
- B. The following are exempt from the requirements of 06-096 C.M.R. ch. 130 [06-096 C.M.R. ch. 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 subject to 06-096 C.M.R. ch. 130.
1. Daaquam shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 C.M.R. ch. 130]:
 - 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 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.

3. Each parts washer shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent
[06-096 C.M.R. ch. 130]

(19) 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 during which time visible emissions shall not exceed 30% opacity. Compliance shall be determined by an aggregate of the individual fifteen-second opacity observations which exceed 20% in any one hour.

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

(20) Semiannual Reporting [06-096 C.M.R. ch. 140]

- A. The licensee shall submit to the Bureau of Air Quality semiannual reports which are due on **January 31st** and **July 31st** of each year. The facility's designated responsible official must sign this report.
- B. The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the Department within seven calendar days of the due date.
- C. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

(21) Annual Compliance Certification

Daaquam shall submit an annual compliance certification to the Department and EPA in accordance with Standard Condition (13) of this license. The annual compliance certification is due January 31st of each year. The facility's designated responsible official must sign this report.

The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the Department within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [06-096 C.M.R. ch. 140]

(22) **Annual Emission Statement**

- A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, Daaquam shall annually report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory. The emission statement shall be submitted as specified by the date in 06-096 C.M.R. ch. 137.
- B. Daaquam shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:
1. The amount of distillate fuel fired in Fire Pump #1;
 2. The amount of wood fired (at 50% moisture) in Boilers #1 and #2 on a monthly basis;
 3. The sulfur content of the distillate fuel fired in Fire Pump #1;
 4. Kiln throughput on a monthly basis;
 5. Calculations of the VOC and/or HAP emissions from the Drying Kilns on a calendar year total basis; and
 6. Hours of operation for each emission unit on an annual basis.

[06-096 C.M.R. ch. 137]

- C. In reporting year 2020 and every third year thereafter, Daaquam shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). Daaquam shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3). [38 M.R.S. § 353-A(1-A)]

(23) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
06-096 C.M.R. ch. 102	Open Burning	-
06-096 C.M.R. ch. 109	Emergency Episode Regulation	-
06-096 C.M.R. ch. 110	Ambient Air Quality Standard	-
06-096 C.M.R. ch. 116	Prohibited Dispersion Techniques	-
38 M.R.S. § 585-B, §§ 5	Mercury Emission Limit	Enforceable by State-only

(24) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. Examples of such units include refrigerators and any size air conditioners that contain CFCs. [40 C.F.R. Part 82, Subpart F]

(25) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Daaquam shall comply with the *Standard for Asbestos Demolition and Renovation*, 40 C.F.R. Part 61, Subpart M.

(26) **Expiration of a Part 70 license**

- A. Daaquam shall submit a complete Part 70 renewal application at least six but no more than 18 months prior to the expiration of this air license.
- B. Pursuant to Title 5 M.R.S. §10002, and 06-096 C.M.R. ch. 140, the Part 70 license shall not expire and all terms and conditions shall remain in effect until the Department takes final action on the renewal application of the Part 70 license. An existing source submitting a complete renewal application under 06-096 C.M.R. ch. 140 prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license. **Enforceable by State-only**

**Daaquam Lumber Maine, Inc.
Aroostook County
Masardis, Maine
A-165-70-H-R**

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**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Renewal**

(27) New Source Review

Daaquam is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emission license, and the NSR requirements remain in effect even if this 06-096 C.M.R. ch. 140 Air Emission License, A-165-70-H-R, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 8 DAY OF February, 2019.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Carr for
GERALD D. REID, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

[Note: If a complete renewal application, as determined by the Department, is submitted at least six but no more than 18 months prior to expiration of the facility's Part 70 license, then pursuant to Title 5 M.R.S. §10002, all terms and conditions of the Part 70 license shall remain in effect until the Department takes final action on the Part 70 license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: November 22, 2017

Date of application acceptance: December 1, 2017

Date filed with the Board of Environmental Protection:

This Order prepared by Benjamin Goundie, Bureau of Air Quality.

