



DEPARTMENT ORDER

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

**Departmental  
Findings of Fact and Order  
Part 70 Air Emission License  
Amendment #1**

**FINDINGS OF FACT**

After review of the Part 70 License amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

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

Louisiana-Pacific Corporation (LP) owns and operates a Laminated Strand Lumber (LSL) and specialty engineered wood panel production facility located in New Limerick, Maine.

New Source Review (NSR) license A-327-77-5-A (NSR #5), issued 3/5/2021, addressed physical and operational changes to accommodate the manufacturing of a new specialty engineered wood product. This project, referred to as the 2021 Expansion Project, included the following changes to the facility:

1. Operational changes to the Blending process;
2. Physical modifications to Line 1 Press (previously referred to as the OSB Press);
3. Physical modifications to the facility's Pneumatic Systems;
4. Installation of new finishing operations; and
5. Installation of a new hammermill.

NSR license amendment A-327-77-6-M (NSR #6), issued 10/20/2021, clarified stack testing requirements for the facility's dryers and extended the deadline for the next compliance test to accommodate ongoing construction of the 2021 Expansion Project.

LP has requested that the provisions of these NSR licenses be incorporated into their Part 70 license.

**B. Emission Equipment**

The following new equipment was added as part of the 2021 Expansion Project:

**Fuel Burning Equipment**

<b>Equipment</b>	<b>Maximum Capacity (MMBtu/hr)</b>	<b>Maximum Firing Rate (gal/hr)</b>	<b>Fuel Type, % sulfur</b>	<b>Manf. Date</b>
Finishing Line Oven #1	5.0	54.6	Propane, negligible	2021
Finishing Line Oven #2	5.0	54.6	Propane, negligible	2021
Finishing Line Oven #3	5.0	54.6	Propane, negligible	2021
Finishing Line Oven #4	6.35	69.4	Propane, negligible	2021
Finishing Line Oven #5	6.35	69.4	Propane, negligible	2021
Finishing Line Oven #6	6.35	69.4	Propane, negligible	2021
Specialty Pre-Heat Oven #1	3.15	34.4	Propane, negligible	2021
Specialty Drying Oven #1	3.15	34.4	Propane, negligible	2021
Specialty Drying Oven #2	3.15	34.4	Propane, negligible	2021

**Process Equipment**

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

The following existing equipment is also addressed in this Part 70 license amendment:

**Process Equipment**

Equipment	Description	Pollution Control Equipment
Line 1 Press <sup>1</sup>	Uses heat from thermal oil and pressure to bind wafers together	RCO/RTO
Pneumatic Systems	Transfers material around the facility	Baghouses
Main Line Spray Booth <sup>2</sup>	Surface treatments for finished product using high-pressure spray guns	Enclosed booths with filters
Dryers (2)	Uses exhaust gases from CHU to dry strands/wafers at a max rate of 15.25 Oven Dried Ton (ODT)/hr	Wet ESP & RTO

<sup>1</sup>Formerly referred to as OSB Press

<sup>2</sup>Formerly referred to as OSB Spray Booth

**Fuel Burning Equipment**

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Fuel Type	Manuf. Date	Install. Date
Press RCO/RTO*	11.2	Propane/Natural Gas	1999	1999
Central Heating Unit (CHU)	278	Bark, wood, mill trimmings	2007	2008
Dryer RTO	13.5	Propane/Natural Gas	2007	2007

\*Combined regenerative catalytic oxidizer (RCO) and regenerative thermal oxidizer (RTO)

**C. Application Classification**

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

LP has requested incorporation into the Part 70 Air License the relevant terms and conditions of NSR license A-327-77-5-A (3/5/2021) and NSR license amendment A-327-77-6-M (10/20/2021) pursuant to *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115. NSR #5 modified the Best Available Control Technology Analysis for existing equipment. Therefore, this license application was considered a Part 70 Significant License Modification and processed under *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

#### **D. Project Description**

The 2021 Expansion Project involved process and equipment changes to enable the production line that previously produced oriented strand board (OSB) to produce both OSB and a new specialty engineered wood panel product (referred to throughout this document as specialty paneling). Independent of the 2021 Expansion Project, laminated strand lumber (LSL) produced on the facility's LSL Press will continue to be finished by the existing LSL Edge Seal Process.

Due to the change in products to be manufactured, this license refers to the former OSB production line as the "Main Line." The Main Line consists of an existing press and spray booth. The OSB Press is renamed to Line 1 Press, and the OSB Spray Booth is renamed to Main Line Spray Booth.

In the blending process, the use of phenol-formaldehyde resin and wax will be used when producing OSB, and MDI (methylene di-phenyl-di-isocyanate) resin and wax will be used when producing the specialty paneling. A small turbo blender was added to mix MDI with wood fines.

Line 1 Press was physically modified. In addition to regular maintenance activities, the press' hydraulic system was upgraded, and a paper overlay system added. These changes allow Line 1 Press to produce either OSB or specialty paneling.

Physical modifications and upgrades were made to the pneumatic systems that collect and transport fines, sawdust, and dust throughout the facility. A new hammermill and ancillary equipment were added. The hammermill is used to grind/shred dry wood and convey fines via the existing pneumatic system.

New finishing lines were added consisting of saws, profilers, coating and adhesive application, drying ovens, one down grade board hog, strapping machines, and packaging equipment. This equipment is housed in the existing building and a new building located on the east end of the facility. In addition to the existing Main Line Spray Booth, there are three new lines: Primer Finish Line, Specialty Finish Coating Line, and Miscellaneous Product Finishing Line.

The Main Line Spray Booth is used to apply edge seal to OSB or primer to the ends of the specialty paneling. No other coating is applied to OSB products. For the specialty paneling, the Primer Finish Line contains high-pressure spray booths, fan coaters, and curtain coaters. It consists of three lanes in parallel. Each of the three lanes has two ovens in series, Finishing Line Ovens #1 - #3 followed by Finishing Line Ovens #4 - #6. All of the specialty paneling is primed and dried using this process. The full priming process is only used for specialty paneling.

After it is primed, a portion of the specialty paneling is coated on the Specialty Finish Coating Line. The Specialty Finish Coating Line consists of one lane with three ovens in series: Specialty Pre-Heat Oven #1 and Specialty Drying Ovens #1 and #2. Specialty paneling is coated using fan coaters and high-pressure spray booths and then dried in the ovens.

The Miscellaneous Product Finishing Line consists of several manual stations where coatings, adhesive, and caulk can be applied. There are no drying ovens associated with this line.

## 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 new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts. BACT for the 2021 Expansion Project was addressed in NSR #5 and explained in further detail below.

### B. Line 1 Press

Line 1 Press (formerly referred to as the OSB Press) was physically modified as part of the 2021 Expansion Project. It was converted to allow production of either OSB or a variety of specialty engineered wood products. The press' hydraulic system was upgraded and a paper overlay system added.

#### 1. BACT

Best Available Control Technology (BACT) for Line 1 Press was addressed in NSR #5.

##### a. Volatile Organic Compounds (VOC)

The primary pollutant of concern from Line 1 Press is VOC (much of which is HAP) which is emitted when the heat and pressure in the press activates the resin which bonds the product together. Potential control technologies evaluated include add-on pollution control equipment such as adsorption systems, absorption systems, biofiltration, condensation systems, and thermal or catalytic oxidation.

The Department found the use of the existing regenerative catalytic oxidizer/regenerative thermal oxidizer (RCO/RTO) and the previously established emission limit of 1.75 lb/hr (as carbon) to represent BACT for VOC emissions from Line 1 Press. This standard applies at all times.

The RCO/RTO is primarily operated as an RCO. LP shall demonstrate compliance with the VOC lb/hr limit while operating as an RCO through emissions testing conducted every other calendar year. To allow time for project construction, the next compliance test is due no later than 12/31/2022.

LP shall demonstrate compliance with the VOC lb/hr limit while operating as an RTO through emissions testing upon request of the Department.

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

A significant portion of the particulate matter emitted from Line 1 Press is in the form of condensable particulate matter (CPM). CPM are gases at elevated temperatures but condense to form small droplets at ambient temperatures. Potential control technologies evaluated include baghouses, electrostatic precipitators (ESP), wet scrubbers, cyclones, and oxidation systems.

The Department found the use of the existing RCO/RTO and the following previously established emission limits to represent BACT for particulate matter emissions (PM, PM<sub>10</sub>, and PM<sub>2.5</sub>) from Line 1 Press.

Operating as...	PM (gr/dscf)	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)
RCO	0.015	12.30	12.30	12.30
RTO	0.015	12.30	12.30	12.30

These standards apply at all times. LP shall demonstrate compliance with the particulate matter gr/dscf and lb/hr limits while operating as an RCO through emissions testing conducted every other calendar year. To allow time for project construction, the next compliance test is due no later than 12/31/2022.

Since the RCO/RTO is primarily operated as an RCO, LP shall demonstrate compliance with the particulate matter gr/dscf and lb/hr limits while operating as an RTO through emissions testing upon request of the Department.

Visible emissions from the RCO/RTO stack (Stack #3) shall not exceed 20% opacity on a six-minute block average basis except for periods of startup, shutdown, malfunction, or approved maintenance.

Approved maintenance includes a bake-out process (as described in Part 70 license A-327-70-O-R, 9/24/2019). During the bake-out process, visible emissions from Stack #3 shall not exceed 30% opacity on a 6-minute block average basis except for 30 minutes during which time visible emissions shall not exceed 70% opacity. Each bake-out process shall not exceed 2 hours. [06-096 C.M.R. ch. 101, § 4(C)]

Compliance shall be demonstrated through performance testing in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 upon request by the Department.

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

The RCO/RTO associated with Line 1 Press burns fuel in order to combust exhaust gases from the press. The RCO/RTO fires propane and is also licensed to fire natural gas. Both are inherently low-sulfur fuels and result in minimal emissions of SO<sub>2</sub>. Additional add-on pollution controls were found to be not economically feasible.

The Department found the use of propane or natural gas in the RCO/RTO and the previously established emission limit of 1.50 lb/hr to represent BACT for SO<sub>2</sub> emissions from Line 1 Press.

This standard applies at all times. LP shall demonstrate compliance with the SO<sub>2</sub> lb/hr limit through emissions testing upon request of the Department.

d. Nitrogen Oxides (NO<sub>x</sub>) and Carbon Monoxide (CO)

The RCO/RTO associated with Line 1 Press burns fuel in order to combust exhaust gases from the press. The unit contains two separate burners which fire propane or natural gas. When operated as an RTO, the maximum heat input for both burners combined is 11.2 MMBtu/hr. However, the RCO/RTO is primarily operated as an RCO firing propane. The presence of the catalyst allows for a lower heat input. Thus, when operated as an RCO, the firing rate of the burners is reduced by inserting an orifice into the gas inlet line to physically limit the firing rate to 7.0 MMBtu/hr (both burners combined).

The use of additional pollution controls for NO<sub>x</sub> and CO for propane/natural gas-fired burners of this size was found to be not economically feasible.

The Department found the use of propane or natural gas in the RCO/RTO and the following previously established emission limits to represent BACT for NO<sub>x</sub> and CO emissions from Line 1 Press.

Operating as...	NO <sub>x</sub> (lb/hr)	CO (lb/hr)
RCO	19.90	9.50
RTO	20.50	9.60

These standards apply at all times. LP shall demonstrate compliance with the NO<sub>x</sub> lb/hr limit while operating as an RCO through emissions testing conducted every five calendar years. The next compliance test is due no later than 12/31/2024.

LP shall demonstrate compliance with the CO lb/hr limits and the NO<sub>x</sub> lb/hr limits while operating as an RTO through emissions testing upon request of the Department.

## 2. Production Limit

LP was previously subject to a production limit from this press of 600 tons of finished product per day on a 7-day rolling average basis. [A-327-70-H-A, 6/30/2006] With NSR #5, LP modified and relicensed Line 1 Press. LP demonstrated that actual emissions are not expected to exceed major modification levels. Therefore, this limitation will be considered obsolete upon startup of the Line 1 Press to produce specialty paneling.

## 3. Periodic Monitoring

The following periodic monitors were required for the Line 1 Press as part of NSR #5. Additional periodic monitoring for reasons other than NSR are addressed in LP's existing Part 70 license (A-327-70-O-R) and included in the Order section of this license.

- a. Date, time, and duration of each bake-out process including start/end times of the warm-up cycle;
- b. Records of Method 9 observations conducted during each bake-out process including date, time, and results; and
- c. Records of any maintenance activities performed (planned or unplanned) on the Press RCO/RTO.



### C. Finishing Lines

This section addresses emissions of particulate matter, VOC, and HAP from the coating operations on new finishing lines. Emission requirements for the ovens associated with the finishing lines are addressed later in this document.

The Main Line Spray Booth uses a high-pressure spray booth to apply edge seal to OSB or primer to the ends of the specialty paneling.

The Primer Finish Line process uses three different methods of primer application. There are 12 fan coating application stations, six curtain coater application stations, and five high-pressure spray coating booths.

The Specialty Finish Coating Line uses one fan coating application station and several high-pressure spray coating booths.

The Miscellaneous Product Finishing Line has several manual stations, including manual spray booths, where coatings, adhesives, and caulk can be applied.

#### 1. BACT

BACT for the finishing lines was addressed in NSR #5.

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

The fan coating and curtain coating processes use a metal fan or metal box to transfer primer from a liquid bath to the product being coated. These coating types do not generate emissions of particulate matter.

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

The Department found the use of particulate filters and the visible emission limit listed below to represent BACT for particulate matter emissions (PM, PM<sub>10</sub>, and PM<sub>2.5</sub>) from the facility's finishing lines.

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

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

Emissions of VOC and HAP from the finishing lines is directly proportional to the VOC/HAP content of the products applied. The finishing lines are subject to State and Federal regulations limiting the amount of VOC and HAP in the coatings, adhesives, and caulk used.

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

*National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products*, 40 C.F.R. Part 63, Subpart QQQQ, contains applicable limits on the organic HAP in the products used.

Both of these regulations are described in greater detail later in this license.

All of the products that will be used are considered to have a low VOC/HAP content. Additionally, LP proposed a combined annual VOC limit for the Main Line Spray Booth, Primer Finish Line, Specialty Finish Coating Line, and Miscellaneous Product Finishing Line of 34.9 tpy on a 12-month rolling total basis.

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

2. Periodic Monitoring

The following periodic monitors are required for the Main Line Spray Booth, Primer Finish Line, Specialty Finish Coating Line, and Miscellaneous Product Finishing Line pursuant to NSR #5. Additional periodic monitoring for reasons other than NSR are addressed in LP's existing Part 70 license (A-327-70-O-R) as well as the requirements described below.

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

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

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

a. Emission Standards

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

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

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

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

(1) Vapor-tight containers shall be used for the storage of spent or fresh VOC and for the storage or disposal of cloth or paper impregnated with VOC that are used for surface preparation, clean up, or coating removal.

(2) Cleanup Operations

(i) The use of VOC is prohibited for cleanup operations unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.

(ii) LP shall collect all organic solvent used to clean spray guns into a normally closed container.

(iii) LP shall pump or drain all organic solvent used for line cleaning into a normally closed container.

(iv) LP shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyers, continuous coaters and their enclosures, and/or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, LP may not use more than 1.0 gallon of organic solvent to prepare the booth prior to applying the booth coating.

- (v) LP shall control emissions from washoff operations by:
  - 1. Using normally closed tanks for washoff; and
  - 2. Minimizing dripping by tilting or rotating the part to drain as much organic solvent as possible.

c. Recordkeeping and Reporting

- (1) LP shall submit to the Department an initial compliance certification upon startup of each new coating unit, line, or operation.

[06-096 C.M.R. ch. 129 § 7(A)]

The initial certification shall contain the following information:

- (i) Name and location of the facility;
- (ii) Name, address, and telephone number of the facility's Responsible Official;
- (iii) Identification of each coating used on each coating line;
- (iv) The mass of VOC per volume of each coating (e.g., lb VOC/gal), excluding water and exempt compounds, as applied, expected to be used each day on each on each coating line; and
- (v) The time at which the facility's "day" begins if a time other than midnight is used to define a "day."

[06-096 C.M.R. ch. 129, § 7(A)(2)]

- (2) LP shall keep records of the following:

- (i) Name and identification of each coating;
- (ii) Mass of VOC per volume (e.g., lb VOC/gal), excluding water and exempt compounds, of each coating as applied; and
- (iii) Amount of each coating used each month.

[06-096 C.M.R. ch. 129, § 7(B)(2)]

- (3) LP shall notify the Department in writing within thirty (30) calendar days of the use of any coatings that do not meet the VOC content limit.

[06-096 C.M.R. ch. 129, § 8(B)(2)]

4. *Architectural and Industrial Maintenance (AIM) Coatings*, 06-096 C.M.R. ch. 151

The 2021 Expansion Project will not make LP subject to *Architectural and Industrial Maintenance (AIM) Coatings*, 06-096 C.M.R. ch.151. This regulation applies to manufacture, sale, and application of architectural coatings. Architectural coating is defined as follows:

*"Architectural coating" means a coating to be applied to stationary structures and their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Coatings applied in shop applications or to non-stationary structures such as airplanes, ships, boats, railcars, and*

*automobiles, and adhesives are not considered architectural coatings for the purposes of this rule.*

LP is not applying coatings to stationary structures or portable buildings at the site of installation.

5. *Control of Volatile Organic Compounds from Adhesives and Sealants*, 06-096 C.M.R. ch. 159

The 2021 Expansion Project will not make LP subject to *Control of Volatile Organic Compounds from Adhesives and Sealants*, 06-096 C.M.R. ch. 159. The product data sheet for the adhesive to be used indicates a VOC content of 0.0105 g/L, less water and exempt compounds, as applied. The requirements of this rule do not apply to adhesives or sealants with a VOC content less than 20 g/L, less water and exempt compounds, as applied, pursuant to 06-096 C.M.R. ch. 159, § 3(A)(3). The caulk that will be used will be purchased from the manufacturer/supplier in 10.1-fluid ounce cartridges and is therefore also exempt pursuant to 06-096 C.M.R. ch. 159, § 3(A)(5).

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

LP is subject to *National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products*, 40 C.F.R. Part 63, Subpart DDDD. The edge seal and primer applied by the Main Line Spray Booth and the primer applied by the Primer Finish Line and Miscellaneous Product Finishing Line meet the definition of “group 1 miscellaneous coating operations.” These processes are subject to the following work practice standards which require they use only non-HAP coatings. [40 C.F.R. § 63.2241(a) and Table 3]

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

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

*National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products*, 40 C.F.R. Part 63, Subpart QQQQ, is applicable to the Specialty Finish Coating Line and the Miscellaneous Product Finishing Line. This equipment is in the subcategory “exterior siding and primed doorskins.”

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

This regulation does not apply to the application of edge seals [40 C.F.R. § 63.4681(c)(1)(i)] or the Primer Finish Line [40 C.F.R. § 63.4681(c)(1)(iii)].

a. Standards

As a new affected source, LP shall limit organic HAP emissions to the atmosphere to no more than the applicable emission limit in Table 1 of the subpart. The limit for exterior siding is 0 grams of organic HAP per liter solids or 0.00 pounds of organic HAP per gallon of solids.

b. Continuous Compliance

Subpart QQQQ offers several options for emission standards. LP has elected to comply with the “compliant material option” described in § 63.4691(a).

Compliance shall be demonstrated by recordkeeping which confirms that the Specialty Finish Coating Line and the Miscellaneous Product Finishing Line uses no coating, thinner, or cleaning material that contains organic HAP. Information from the supplier or manufacturer of the material, such as manufacturer’s formulation data, may be relied on. [40 C.F.R. § 63.4741(a)(4)]

Materials are considered to not contain organic HAP if they contain less than 0.1% (by mass) of certain compounds considered to be human carcinogens or possible human carcinogens or less than 1.0% (by mass) for other HAP. Subpart QQQQ currently contains an outdated citation for the list of compounds subject to the 0.1% threshold. EPA intends to update this regulation in the future to contain a table containing the organic HAP that must be counted if present at 0.1% or more by mass. Until such time, LP should refer to Table 5 in 40 C.F.R. Part 63, Subparts IIII, MMMM, or PPPP.

The use of any coating, thinner, or cleaning material on the Specialty Finish Coating Line or the Miscellaneous Product Finishing Line that contains organic HAP not compliant with the standards listed above is considered a deviation from the emission limitations that must be reported. [40 C.F.R. § 63.4742(b)]

c. Recordkeeping

LP shall maintain records for the Specialty Finish Coating Line and the Miscellaneous Product Finishing Line in accordance with 40 C.F.R. Part 63, Subpart QQQQ including, but not limited to, the following:

- (1) A copy of each notification and report submitted to comply with this subpart;
  - (2) Information provided by material suppliers or manufacturers used to determine the mass fraction of organic HAP of coatings, thinners, and cleaners;
  - (3) A record of the coating operations in use (e.g., Specialty Finish Coating Line) and the compliance option used (e.g., compliant material) for each reporting period;
  - (4) The name and volume of each coating, thinner, and cleaning material used;
  - (5) The mass fraction of organic HAP for each coating, thinner and cleaning material used; and
  - (6) The date, time, and duration of any deviation.
- [40 C.F.R. § 63.4730]

d. Notifications

- (1) LP shall submit the Initial Notification required by 40 C.F.R. § 63.9(b) no later than 120 days after startup of either the Specialty Finish Coating Line or the Miscellaneous Product Finishing Line whichever comes first.  
[40 C.F.R. § 63.4710(b)]
- (2) LP shall submit the Notification of Compliance Status (NOCS) required by 40 C.F.R. § 63.9(h) no later than 30 calendar days after the end of the initial compliance period. [40 C.F.R. § 63.4710(c)]

The initial compliance period begins upon startup of the affected units and ends on the last day of the 12<sup>th</sup> month following that date. [40 C.F.R. § 63.4740]

The NOCS shall be submitted electronically pursuant to 40 C.F.R. §§ 63.4720(d)(2) – (4).

e. Reports

LP shall submit semiannual compliance reports according to the requirements of 40 C.F.R. §§ 63.4720(a)(1) - (7).

LP is required to submit semiannual monitoring reports as a condition of their Part 70 license. If LP submits a semiannual compliance report as required by Part 70 which includes all of the required information concerning deviations from

any emission limitation in Subpart QQQQ, its submission shall be deemed to satisfy the semiannual reporting requirement of Subpart QQQQ.  
[40 C.F.R. § 63.4720(a)(2)]

#### D. Finishing Line Ovens

The Primer Finish Line consists of three lanes in parallel. Each of the three lanes has two ovens in series, Finishing Line Ovens #1 - #3 (5.0 MMBtu/hr each) followed by Finishing Line Ovens #4 - #6 (6.35 MMBtu/hr each).

The Specialty Finish Coating Line consists of one lane with three ovens in series, Specialty Pre-Heat Oven #1 (3.15 MMBtu/hr) and Specialty Drying Ovens #1 and #2 (3.15 MMBtu/hr each).

##### 1. BACT

BACT for the finishing line ovens was addressed in NSR #5.

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

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

The Department found the use of propane as a fuel and the emission limits listed in the table below to represent BACT for particulate matter (PM, PM<sub>10</sub>, and PM<sub>2.5</sub>) from the finishing line ovens.

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

LP proposed to fire only propane, an inherently low-sulfur fuel. The use of this fuel results in minimal emissions of SO<sub>2</sub>, and additional add-on pollution controls are not economically feasible.

The Department found the use of propane as a fuel to represent BACT for SO<sub>2</sub> from the finishing line ovens. Emissions of SO<sub>2</sub> from these units are determined to be negligible.

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

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



The Department found the use of propane, LNBS, and the emission limits listed in the table below to represent BACT for NO<sub>x</sub> emissions from the finishing ovens.

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

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

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

2. Emission Limits

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

- PM/PM<sub>10</sub>/PM<sub>2.5</sub> – 0.7 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
- NO<sub>x</sub> – 0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BACT and manufacturer’s specifications
- CO – 7.5 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
- VOC – 1.0 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
- Visible Emissions – 06-096 C.M.R. ch. 115, BACT

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

Unit	Pollutant	lb/MMBtu
Finishing Line Ovens #1 - #3 (each)	PM	0.008
Finishing Line Ovens #4 - #6 (each)	PM	0.008
Specialty Pre-Heat Oven #1	PM	0.008
Specialty Drying Ovens #1 & #2 (each)	PM	0.008

Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Finishing Line Ovens #1 - #3 (each)	0.04	0.04	0.04	0.25	0.41	0.05
Finishing Line Ovens #4 - #6 (each)	0.05	0.05	0.05	0.32	0.52	0.07
Specialty Pre-Heat Oven #1	0.02	0.02	0.02	0.16	0.26	0.03
Specialty Drying Ovens #1 & #2 (each)	0.02	0.02	0.02	0.16	0.26	0.03

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

3. Visible Emissions

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

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

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

Due to their size and not being “steam generating units,” the finishing ovens are not subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr manufactured after June 9, 1989. [40 C.F.R. § 60.40c]

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

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

**E. Pneumatic Systems**

Materials, including fines, sawdust, and dust generated by various processes, storage bins, and conveying systems are collected by several pneumatic systems made up of enclosures, ductwork, fans, and baghouses.

LP considered several control technologies for emissions of particulate matter from the pneumatic systems, including baghouses, cyclones, ESPs, and wet scrubbers. Baghouses were determined to have the highest control efficiency for this type of process and are commonly in use in the wood products industry as reflected in the RBLC (RACT, BACT, LAER Clearinghouse) database.

Eight baghouses were affected by this project. Four existing baghouses (Baghouses # 1/2, 4, 6, and 9) were refurbished, replaced, and/or relocated. Existing Baghouses # 3, 5, 7, and 8 were refurbished as necessary but remained in their current locations. One new baghouse (Baghouse #1) was installed.

The Department found the use of baghouses and the visible emission limit listed below to represent BACT for particulate matter emissions (PM, PM<sub>10</sub>, and PM<sub>2.5</sub>) from the facility's pneumatic systems.

Visible emissions from each of the Pneumatic Systems Baghouses shall not exceed 10% opacity on a 6-minute block average basis. LP shall take corrective action if visible emissions exceed 5% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 101, § 3(B)(3)]

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

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

1. Pressure drop for each baghouse recorded once per shift.
2. Records of any maintenance activities performed (planned or unplanned) on each baghouse.

#### **F. Performance Test Deadlines**

Line 1 Press is subject to periodic performance testing for NO<sub>x</sub> conducted at least once every five calendar years and for VOC conducted at least once every other (i.e., every two) calendar year. To allow time for construction of the 2021 Expansion Project, NSR #5 moved the next compliance test for VOC, and it is now due no later than 12/31/2022. The test schedule for NO<sub>x</sub> was unaffected.

LP's Central Heating Unit (CHU) provides direct-contact heat to two rotary dryers (Dryers). Exhaust from the Dryers is controlled by cyclones, a wet electrostatic precipitator (WESP), and finally a regenerative thermal oxidizer (Dryer RTO).

The Dryers are subject to periodic performance testing for NO<sub>x</sub> and PM. NSR #6 clarified that testing for NO<sub>x</sub> was to be conducted at least once every five calendar years and testing for PM was to be conducted at least once every other (i.e., every two) calendar years. Due to the integral nature of the Dryers to Line 1 Press and the construction associated with the 2021 Expansion Project, NSR #6 moved the next compliance test for PM, and it is now due no later than 12/31/2022. The test schedule for NO<sub>x</sub> was unaffected.

### G. Performance Test Protocol

For any performance testing required by the facility's license, LP shall submit to the Department for approval a performance test protocol, as outlined in the Department's Performance Testing Guidance, at least 30 days prior to the scheduled date of the performance test.

The Department's Performance Testing Guidance is available online at:  
<https://www.maine.gov/dep/air/emissions/testing.html>

### H. Facility Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility's annual air license fee. Only licensed equipment is included, i.e., emissions from insignificant activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included. Maximum potential emissions were calculated based on the following assumptions:

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

Please note, this information provides the basis for fee calculation only and should not be construed to represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

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

	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC <sup>1</sup>
CHU – TOS Stack	20.1	20.1	16.7	154.0	154.0	4.3
CHU – Dryer Vent Stack (RTO Stack)	68.3	68.3	1.9	144.1	477.4	24.0
Dry Wafer Storage Bins	0.5	0.5	–	–	–	3.1
LSL Flying Cut-off Saw	2.5	2.5	–	–	–	8.6
LSL Press	–	–	–	–	–	32.6
Line 1 Press	53.9	53.9	6.6	89.8	42.0	–
LSL Edge Seal	–	–	–	–	–	1.1
Fire Pump	–	–	–	0.3	0.1	–
TOS Backup Pump	–	–	–	0.1	–	–
Finishing Line Ovens #1-#3	0.5	0.5	–	3.3	5.4	0.7
Finishing Line Ovens #4-#6	0.6	0.6	–	4.2	6.8	0.9
Specialty Pre-Heat Oven #1	0.1	0.1	–	0.7	1.1	0.2
Specialty Drying Ovens #1 - #2	0.2	0.2	–	1.4	2.3	0.3
Finishing Lines <sup>2</sup>	–	–	–	–	–	34.9
<b>Total TPY</b>	<b>146.7</b>	<b>146.7</b>	<b>25.2</b>	<b>397.9</b>	<b>689.1</b>	<b>110.7</b>

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

<sup>2</sup> Includes the Main Line Spray Booth, Primer Finish Line, Specialty Finish Coating Line, and Miscellaneous Product Finishing Line.

### III. AMBIENT AIR QUALITY ANALYSIS

LP previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (see license A-327-77-1-N, issued 8/26/2006). An additional ambient air quality analysis is not required for this Part 70 License Amendment.

## ORDER

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

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

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

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

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

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

### SPECIFIC CONDITIONS

**The following shall replace Conditions (16)(D) and (E) of Air Emission License A-327-70-O-R:**

#### (16) CHU - Dryers

- D. LP shall demonstrate compliance with the PM gr/dscf and lb/hr emission limits for Stack #2 (Dryer RTO) through performance testing conducted at least once every other calendar year. The next compliance test is due no later than 12/31/2022.  
[06-096 C.M.R. ch. 115, BPT (A-327-77-6-M, 10/20/2021)]
- E. LP shall demonstrate compliance with the NO<sub>x</sub> lb/hr emission limit for Stack #2 (Dryer RTO) through performance testing conducted at least once every five calendar years. The next compliance test is due no later than 12/31/2024.  
[06-096 C.M.R. ch. 115, BPT (A-327-77-6-M, 10/20/2021)]

The following shall replace Condition (19) of Air Emission License A-327-70-O-R:

(19) **Line 1 Press**

A. Control Equipment

1. Emissions of VOC and HAP from the Line 1 Press shall be controlled by the operation and maintenance of an RCO/RTO. The main forming line shall not operate unless the Press RCO/RTO is operating. For safety and fire hazard concerns, LP shall be allowed a maximum of 15 minutes from the time the RCO/RTO goes down to shut down the production line.  
[06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]
2. LP is licensed to fire propane or natural gas in the Press RCO/RTO.  
[06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]
3. When operated as an RCO, the maximum heat input to the Press RCO/RTO shall not exceed 7.0 MMBtu/hr. When operating as an RTO, the maximum heat input to the Press RCO/RTO shall not exceed 11.2 MMBtu/hr. Compliance shall be demonstrated by flow meter logs or fuel flow recording charts and heating values of 0.0915 MMBtu/gal for propane and 1,020 MMBtu/million scf of natural gas.  
[06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]
4. When the Press RCO/RTO is operated as an RTO, the 3-hour block average firebox temperature shall be maintained above the minimum temperature established during the most recent performance test at all operating times except for periods of process unit or control device startup, shutdown, and malfunction. Startup and shutdown periods shall not exceed the minimum amount of time necessary for these events. [40 C.F.R. §§ 63.2240(b), 63.2250(a), and Table 2, Row 1]
5. When the Press RCO/RTO is operated as an RCO, the 3-hour block average catalytic oxidizer temperature shall be maintained above the minimum temperature established during the most recent performance test at all operating times except for periods of process unit or control device startup, shutdown, and malfunction. Startup and shutdown periods shall not exceed the minimum amount of time necessary for these events. [40 C.F.R. §§ 63.2240(b), 63.2250(a), and Table 2, Row 2]
6. When the Press RCO/RTO is operated as an RCO, LP shall check the activity level of a representative sample of the catalyst at least every 12 months and take any necessary corrective action to ensure that the catalyst is performing within its design range. [40 C.F.R. § 63.2271(a) and Table 7, Row 4]

7. LP shall use a wood products enclosure (as defined in § 63.2292) on the Line 1 Press. [40 C.F.R. § 63.2267]

B. Production Limit

Until the Line 1 Press begins producing specialty paneling, production of OSB shall not exceed 600 tons of finished product per day on a seven-day rolling average basis. This condition becomes obsolete upon startup of the Line 1 Press to produce specialty paneling. [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

C. Emission Limits

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

1. Emissions from the Line 1 Press shall not exceed the following limits:

Pollutant	ppmdv	Origin and Authority	Enforceability
THC	20 (as carbon) or alternative option as allowed in Table 1B of the rule (See Note 1)	40 C.F.R. Part 63, Subpart DDDD, Table 1B	Federally Enforceable

Note 1: This limit applies at all operating times except for periods of process unit or control device startup, shutdown, and malfunction. Table 1B of 40 C.F.R. Part 63, Subpart DDDD allows for six compliance options. As an alternative to the 20 ppmvd THC limit, the facility may comply with one of the other five options listed in Table 1B without obtaining prior approval from the Department. [40 C.F.R. § 63.2250(a)]

2. Emissions from the Line 1 Press shall not exceed the following limits: [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

Pollutant	gr/dscf
PM	0.015

3. Emissions from the Line 1 Press shall not exceed the following limits: [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

Controlled by...	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
RCO	12.30	12.30	12.30	1.50	19.90	9.50	1.75 (as carbon)
RTO	12.30	12.30	12.30	1.50	20.50	9.60	1.75 (as carbon)



D. Visible Emissions

1. When the Line 1 Press is operating, visible emissions from Stack #3 shall not exceed 20% opacity on a 6-minute block average except for periods of startup, shutdown, malfunction, or approved maintenance. [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

2. Approved Maintenance

During the bake-out process, visible emissions from Stack #3 shall not exceed 30% opacity on a 6-minute block average basis except for 30 minutes during which time visible emissions shall not exceed 70% opacity. Each bake-out process shall not exceed 2 hours. [06-096 C.M.R. ch. 101, § 4(C)]

3. LP shall demonstrate compliance with the alternative visible emission limits during every RTO bake-out through conducting observations consistent with 40 C.F.R. Part 60, Appendix A, Method 9. Observations shall be started 20 to 30 minutes after the end of the warm-up cycle and shall be conducted for at least 18 minutes. [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

4. Upon request by the Department, LP shall demonstrate compliance with the visible emission limits for Stack #3 through performance testing in accordance with 40 C.F.R. Part 60, Appendix A, Method 9. [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

- E. Compliance with the emission limits associated with operation as an RTO shall be demonstrated by performance testing upon request using test methods approved by the Department. [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

- F. LP shall demonstrate compliance with the PM gr/dscf and lb/hr emission limits for operation as an RCO through performance testing conducted every other calendar year. To allow time for project construction, the next compliance test is due no later than 12/31/2022. [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

- G. LP shall demonstrate compliance with the NO<sub>x</sub> lb/hr emission limit for operation as an RCO through performance testing conducted every five calendar years. The next compliance test is due no later than 12/31/2024. [06-096 C.M.R. ch. 115, BACT (A-327-77-6-M, 10/20/2021)]

- H. LP shall demonstrate compliance with the VOC lb/hr emission limit for operation as an RCO through performance testing conducted every other calendar year. To allow time for project construction, the next compliance test is due no later than 12/31/2022. [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

- I. LP shall demonstrate compliance with the THC ppm<sub>dv</sub> emission limit through use of a CPMS pursuant to 40 C.F.R. § 63.2271(a) and Table 7. If LP complies with an alternative limit under 40 C.F.R. Part 63, Subpart DDDD, Table 1B, compliance shall be demonstrated through the requirements of Table 7, as appropriate.
- J. Upon request by the Department, LP shall conduct performance testing to demonstrate compliance with the PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, and CO lb/hr emission limits for operation as an RCO using test methods approved by the Department.  
[06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

K. Periodic Monitoring

LP shall operate, record data, and maintain records from the following periodic monitors for the Line 1 Press:

- 1. Hours of operation for the Line 1 Press a on monthly and calendar year basis.  
[06-096 C.M.R ch. 137]
- 2. Date, time, and duration of each bake-out process including start/end times of the warm-up cycle; [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]
- 3. Records of Method 9 observations conducted during each bake-out process including date, time, and results; [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]
- 4. Records of any maintenance activities performed (planned or unplanned) on the Press RCO/RTO; [06-096 C.M.R. ch. 115, BACT. (A-327-77-5-A, 3/5/2021)]
- 5. Propane or natural gas usage for the Press RCO/RTO. [06-096 C.M.R. ch. 137]
- 6. Records of annual catalyst activity checks and subsequent corrective actions.  
[40 C.F.R. § 63.2282(e)]

L. Parameter Monitors

During all operating times, LP shall operate, record data, and maintain records from the following CPMS for the Line 1 Press, as applicable:

Parameter	Frequency
Press RTO Firebox Temperature (when operated as an RTO)	Monitor: Continuously Record: Continuously
Press RCO Catalytic Oxidizer Temperature (when operated as an RCO)	Monitor: Continuously Record: Continuously

[40 C.F.R. § 63.2271(a) and Table 7, Row 1]

The following shall replace Condition (21) of Air Emission License A-327-70-O-R:

(21) **LSL Edge Seal Process**

A. Emission Limits

Emissions from the LSL Edge Seal Process shall not exceed the following limits:

Pollutant	lb/hr	Origin and Authority	Enforceability
VOC (LSL Process)	1.1 tpy	06-096 C.M.R. ch. 115, BACT (A-327-77-2-A, 9/6/2007)	Federally Enforceable

B. The LSL Edge Seal Process shall use only non-HAP coatings. [40 C.F.R. § 63.2241(a) and Table 3]

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

C. Periodic Monitoring

LP shall operate, record data, and maintain records from the following periodic monitors for the LSL Edge Seal Process:

1. VOC content (by weight) of the coatings used;
2. Documentation that only non-HAP coatings are used; and
3. Amount of each coating used on a monthly basis.

[06-096 C.M.R. ch. 137 and 06-096 C.M.R. ch. 115, BACT (A-327-70-H-A)]

The following shall replace Condition (23) of Air Emission License A-327-70-O-R:

(23) **Pneumatic Systems**

A. Emissions of particulate matter from the Pneumatic Systems shall be controlled by the operation and maintenance of baghouses. [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

B. Visible emissions from each of the Pneumatic Systems Baggouses shall not exceed 10% opacity on a 6-minute block average basis. LP shall take corrective action if visible emissions exceed 5% opacity on a 6-minute block average basis.

[06-096 C.M.R. ch. 101, § 3(B)(3)]

C. Upon request by the Department, LP shall demonstrate compliance with the visible emission limit for the Pneumatic Systems through performance testing in accordance with 40 C.F.R. Part 60, Appendix A, Method 9. [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

D. Periodic Monitoring

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

1. Pressure drop for each baghouse recorded once per shift.
2. Records of any maintenance activities performed (planned or unplanned) on each baghouse.

[06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

**The following are New Conditions:**

**(40) Finishing Lines**

A. Emissions of VOC from the Main Line Spray Booth, Primer Finish Line, Specialty Finish Coating Line, and Miscellaneous Product Finishing Line (combined) shall not exceed 34.9 tpy (12-month rolling total basis). Compliance shall be demonstrated by monthly calculations of VOC use for the Main Line Spray Booth, Primer Finish Line, Specialty Finish Coating Line, and Miscellaneous Product Finishing Line. [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

B. Visible emissions from any finishing line spray booth which vents outside shall not exceed 10% opacity on a 6-minute block average basis. Upon request by the Department, LP shall demonstrate compliance with the visible emission limit through performance testing in accordance with 40 C.F.R. Part 60, Appendix A, Method 9. [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

C. LP shall use only non-HAP coatings in the Main Line Spray Booth and the Primer Finish Line and when applying primer in the Miscellaneous Product Finishing Line. [40 C.F.R. § 63.2241(a) and Table 3]

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

D. Periodic Monitoring

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

1. Name and identification of each coating used; [06-096 C.M.R. ch. 129, § 7(B)(2)]
2. Mass of VOC per volume (e.g., lb VOC/gal), excluding water and exempt compounds, for each coating as applied; [06-096 C.M.R. ch. 129, § 7(B)(2)]
3. Documentation that only non-HAP coatings are used in the Main Line Spray Booth and the Primer Finish Line and when applying primer in the Miscellaneous Product Finishing Line; [40 C.F.R. Part 63, Subpart DDDD]
4. Amount of each coating used each month; [06-096 C.M.R. ch. 129, § 7(B)(2)]
5. A copy of each notification and report submitted to comply with 40 C.F.R. Part 63, Subpart QQQQ; [40 C.F.R. § 63.4730(a)]
6. Information provided by material suppliers or manufacturers used to determine the mass fraction of organic HAP of coatings, thinners, and cleaners; [40 C.F.R. § 63.4730(b)]
7. A record of the coating operations in use (e.g., Specialty Finish Coating Line) and the compliance option used (e.g., compliant material) for each reporting period; [40 C.F.R. § 63.4730(c)(1)]
8. The name and volume of each coating, thinner, and cleaning material used; [40 C.F.R. § 63.4730(d)]
9. The mass fraction of organic HAP for each coating, thinner, and cleaning material used; [40 C.F.R. § 63.4730(e)]
10. The date, time, and duration of any deviations; [40 C.F.R. § 63.4730(j)] and
11. Dates the particulate filters are replaced on each spray booth; [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

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

1. Emission Standards

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

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

- a. Vapor-tight containers shall be used for the storage of spent or fresh VOC and for the storage or disposal of cloth or paper impregnated with VOC that are used for surface preparation, clean up, or coating removal. [06-096 C.M.R. ch. 129, § 5(A)]

b. Cleanup Operations

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

[06-096 C.M.R. ch. 129, § 5(B)]

3. Reporting

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

[06-096 C.M.R. ch. 129, § 7(A)(2)]
- c. LP shall notify the Department in writing within thirty (30) calendar days of the use of any coatings that do not meet the VOC content limit.  
[06-096 C.M.R. ch. 129, § 8(B)(2)]

F. Following are applicable requirements of 40 C.F.R. Part 63, Subpart QQQQ for the Specialty Finish Coating Line and the Miscellaneous Product Finishing Line not addressed elsewhere in this Order:

1. Emission Standards

LP shall limit organic HAP emissions to the atmosphere to 0 grams of organic HAP per liter solids or 0.00 pounds of organic HAP per gallon of solids.  
[40 C.F.R. § 63.4690(a) and Table 1]

2. Continuous Compliance

Compliance with the emission standards in (1) above shall be demonstrated by recordkeeping which confirms that the Specialty Finish Coating Line and the Miscellaneous Product Finishing Line uses no coating, thinner, or cleaning material that contains organic HAP. Information from the supplier or manufacturer of the material, such as manufacturer's formulation data, may be relied on.  
[40 C.F.R. § 63.4741(a)(4)]

3. Notifications

a. LP shall submit the Initial Notification required by 40 C.F.R. § 63.9(b) no later than 120 days after startup of either the Specialty Finish Coating Line or the Miscellaneous Product Finishing Line (whichever comes first).  
[40 C.F.R. § 63.4710(b)]

b. LP shall submit the Notification of Compliance Status (NOCS) required by 40 C.F.R. § 63.9(h) no later than 30 calendar days after the end of the initial compliance period. [40 C.F.R. § 63.4710(c)]

The initial compliance period begins upon startup of the affected units and ends on the last day of the 12<sup>th</sup> month following that date. [40 C.F.R. § 63.4740]

c. The NOCS shall be submitted electronically pursuant to 40 C.F.R. §§ 63.4720(d)(2) – (4).

4. Reports

LP shall submit semiannual compliance reports according to the requirements of 40 C.F.R. §§ 63.4720(a)(1) - (7).

If LP submits a semiannual compliance report as required by Part 70 which includes all of the required information concerning deviations from any emission limitation in Subpart QQQQ, its submission shall be deemed to satisfy the semiannual reporting requirement of Subpart QQQQ.  
[40 C.F.R. § 63.4720(a)(2)]

(41) **Finishing Line Ovens**

- A. The finishing line ovens shall only fire propane.  
[06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]
- B. The finishing line ovens shall each be equipped with low-NO<sub>x</sub> burners.  
[06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]
- C. Emissions shall not exceed the following:  
[06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

Unit	Pollutant	lb/MMBtu
Finishing Line Ovens #1 - #3 (each)	PM	0.008
Finishing Line Ovens #4 - #6 (each)	PM	0.008
Specialty Pre-Heat Oven #1	PM	0.008
Specialty Drying Ovens #1 & #2 (each)	PM	0.008

- D. Emissions shall not exceed the following:  
[06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Finishing Line Ovens #1 - #3 (each)	0.04	0.04	0.04	0.25	0.41	0.05
Finishing Line Ovens #4 - #6 (each)	0.05	0.05	0.05	0.32	0.52	0.07
Specialty Pre-Heat Oven #1	0.02	0.02	0.02	0.16	0.26	0.03
Specialty Drying Ovens #1 & #2 (each)	0.02	0.02	0.02	0.16	0.26	0.03



- E. Visible emissions from each of the finishing line ovens shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]
- F. LP shall demonstrate compliance with the emission limits above through performance testing upon request of the Department.  
[06-096 C.M.R. ch. 115, BACT (A-327-77-5-A, 3/5/2021)]

**(42) Future Project Emissions Reporting**

- A. LP shall monitor, calculate, and maintain a record of the annual emissions, in tons per year on a calendar year basis, of PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO, and VOC for all emission units that are part of the 2021 Expansion Project (modified or affected). LP shall monitor, calculate, and maintain a record of the annual emissions for a period of 5 years following the resumption of regular operations after the change.  
[40 C.F.R. § 52.21(r)(6)]
- B. If the annual emissions, in tons per year, from the project exceed the baseline actual emissions, excluding any emission increase unrelated to the project and due to demand growth, for any of these pollutants by an amount equal to or greater than the significant emissions increase level for that pollutant as identified in NSR air emission license A-327-77-5-A (3/5/2021), LP shall submit a report to the Department and EPA within 60 days after the end of the calendar year which contains the following:
  - 1. The facility name, address, and phone number;
  - 2. The annual emissions for the project; and
  - 3. Any other information that the facility wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection.)  
[40 C.F.R. § 52.21(r)(6)(v)]

(43) **Performance Test Protocol**

For any performance testing required by the facility's license, LP shall submit to the Department for approval a performance test protocol, as outlined in the Department's Performance Testing Guidance, at least 30 days prior to the scheduled date of the performance test. [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-only**

DONE AND DATED IN AUGUSTA, MAINE THIS 14<sup>th</sup> DAY OF DECEMBER, 2021.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for  
MELANIE LOYZIM, COMMISSIONER

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 9/14/2021

Date of application acceptance: 9/16/2021

Date filed with the Board of Environmental Protection:

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

**FILED**  
DEC 14, 2021  
State of Maine  
Board of Environmental Protection