



DEPARTMENT ORDER

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

Departmental  
Findings of Fact and Order  
Part 70 Air Emission License  
Amendment #2

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 Administrative Revision
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.

LP has requested a Part 70 Administrative Revision to remove streamlining from certain nitrogen oxides (NO<sub>x</sub>) emission limits applicable to the CHU-TOS stack.

B. Emission Equipment

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

Fuel Burning Equipment

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Fuel Type	Manuf. Date	Install. Date
Central Heating Unit (CHU)	278	Bark, wood, mill trimmings	2007	2008

### C. Revision Description

The Central Heating Unit (CHU) is a biomass-fired unit with a design heat input capacity of 278 MMBtu/hr. The fuel source for the CHU is biomass, mostly wood waste generated during the log debarking process.

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

Emissions of NO<sub>x</sub> from the CHU-TOS exhaust are subject to emission standards established under both New Source Review (NSR) and *Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides*, 06-096 C.M.R. ch. 138 (NO<sub>x</sub> RACT).

NSR licenses A-327-77-1-N (8/28/2006) and A-327-77-2-A (9/6/2007) established the following emission limits for NO<sub>x</sub> from the CHU-TOS pursuant to a Best Available Control Technology (BACT) analysis:

- 200 ppm<sub>dv</sub> @ 7% O<sub>2</sub> on a 30-day rolling average;
- 0.23 lb/MMBtu
- 35.2 lb/hr

The NSR licenses above established that compliance with the ppm<sub>dv</sub> standard was based on the use of a continuous emissions monitoring system (CEMS) and an Fd factor of 9,600 dscf/MMBtu, and compliance with the lb/MMBtu and lb/hr standards was based on stack testing in accordance with 40 C.F.R. Part 60, Appendix A.

NO<sub>x</sub> RACT establishes an emission standard of 0.30 lb/MMBtu. [06-096 C.M.R. ch 138, § 3(B)(2)] Since the CHU has a heat input greater than 250 MMBtu/hr, compliance must be demonstrated through use of a CEMS [06-096 C.M.R. ch. 138, § 3(B)(6)] and is on a 24-hour daily block arithmetic average basis [06-096 C.M.R. ch. 138, § 3(B)(8)].

In LP's Part 70 license (A-327-70-O-R, 9/24/2019), the two lb/MMBtu standards were streamlined together. When two standards are combined through streamlining, the most stringent aspects of each standard are retained. This resulted in a streamlined standard of 0.23 lb/MMBtu on a 1-hour basis demonstrated by use of a CEMS. Streamlining of standards is optional, and LP has requested removal of the streamlining since the standard established through NSR is on a 1-hour average specifically because compliance was to be demonstrated through stack testing.

The Department agrees that the forms of the standards are incompatible and that streamlining in this instance is inappropriate. This revision removes the previously streamlined standard and replaces it with the two established underlying standards on which it was based.

#### **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.

A Part 70 Administrative Revision is for license changes that correct typographical errors; change the name, address, or phone number of any person or facility identified in the Part 70 license or a similar administrative change at the Part 70 source; or result in more frequent monitoring, reporting, recordkeeping or testing requirements.

The requested revision to remove streamlining from the CHU-TOS NO<sub>x</sub> lb/MMBtu standards meets the definition of a Part 70 Administrative Revision and has been processed under *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

#### **E. Facility Annual Emissions**

This license amendment will not change the facility's licensed annual emissions.

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

LP previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (see license A-327-77-1-N, issued on 8/28/2006). 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 Administrative Revision A-327-70-Q-A pursuant to 06-096 C.M.R. 140 and the preconstruction permitting requirements of *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 and subject to the conditions found in Air Emission License A-327-70-O-R, in amendment A-327-70-P-A, and the following conditions.

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

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

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 Condition (15)(B)(2) of Air Emission License A-327-70-O-R:

(15) **CHU – TOS**

B. Emission Limits

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

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

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.030 (See Note 3)	40 C.F.R. Part 60, Subpart Db, § 60.43b(h)(1)	Federally Enforceable
PM <sub>10</sub>	0.030	06-096 C.M.R. ch. 115, BACT (A-327-77-2-A, 9/6/2007)	Federally Enforceable
NO <sub>x</sub>	0.23	06-096 C.M.R. ch. 115, BACT (A-327-77-1-N, 8/28/2006 & A-327-77-2-A, 9/6/2007)	Federally Enforceable
NO <sub>x</sub>	0.30 24-hr block avg (See Note 4)	06-096 C.M.R. ch. 138, § 3(B)(2)	Federally Enforceable
HCl	2.2 x 10 <sup>-2</sup> (See Note 2)	40 C.F.R. Part 63, Subpart DDDDD, Table 2, Row 1(a)	Federally Enforceable
Hg	5.7 x 10 <sup>-6</sup> (See Note 2)	40 C.F.R. Part 63, Subpart DDDDD, Table 2, Row 1(b)	Federally Enforceable

Note 2: This limit applies at all operating times except periods of startup and shutdown.  
[40 C.F.R. § 63.7500(f)]

Note 3: This limit applies at all operating times except periods of startup, shutdown, and malfunction. [40 C.F.R. § 60.43b(g)]

Note 4: Periods of startup, shutdown, and malfunction shall not be included in determining the 24-hour daily block arithmetic average provided that operating records are available to demonstrate that the facility was being operated to minimize emissions. [06-096 C.M.R. ch. 138, § 3(O)]

**Conditions (15)(D) through (G) of Air Emission License A-327-70-O-R are Deleted and Replaced with the following:**

**(15) CHU – TOS**

**D. CEMS/COMS**

1. LP shall install, calibrate, maintain, and operate a COMS on Stack #1 and record the output of the system. [40 C.F.R. § 60.48b(a)]
2. The span value of the COMS shall be between 60 and 80 percent. [40 C.F.R. § 60.48b(e)(1)]
3. LP shall operate and maintain a COMS according to the procedures in §§ 63.7525(c)(1) – (7). [40 C.F.R. § 63.7525(c)]
4. LP shall operate and maintain a NO<sub>x</sub> CEMS on Stack #1 and record the output of the system. [06-096 C.M.R. ch. 117, § 1(B)(2)]
5. LP shall operate and maintain a CEMS for CO and oxygen according to the procedures in §§ 63.7525(a)(1) – (6). [40 C.F.R. § 63.7525(a) and 06-096 C.M.R. ch. 115, BACT (A-327-77-1-N, 8/28/2006 & A-327-77-2-A, 9/6/2007)]

**E. Compliance Methods**

Note: Compliance methods for the PM, HCl, and Hg lb/MMBtu emission limits is addressed in Condition (15)(K).

1. Compliance with the PM lb/hr emission limit shall be demonstrated through performance testing conducted at least once every five calendar years. The next compliance test is due no later than 12/31/2025. The performance testing for PM lb/MMBtu required under 40 C.F.R. § 63.7515 satisfies this testing requirement if results are also provided in lb/hr. [06-096 C.M.R. ch. 115, BACT (A-327-77-2-A) and 38 M.R.S. § 589.2]
2. Compliance with the NO<sub>x</sub> ppm<sub>dv</sub> emission limit shall be demonstrated through use of the NO<sub>x</sub> CEMS. [06-096 C.M.R. ch. 115, BACT (A-327-77-1-N, 8/28/2006 & A-327-77-2-A, 9/6/2007)]
3. Compliance with the NO<sub>x</sub> RACT emission limit (0.30 lb/MMBtu on a 24-hour block arithmetic average) shall be demonstrated through use of the NO<sub>x</sub> CEMS. [06-096 C.M.R. ch. 138, § 3(B)(6)]

4. Compliance with the NO<sub>x</sub> lb/MMBtu emission limit established through BACT (0.23 lb/MMBtu) shall be demonstrated through stack testing in accordance with 40 C.F.R. Part 60, Appendix A upon request by the Department. [06-096 C.M.R. ch. 115, BACT (A-327-77-1-N, 8/28/2006 & A-327-77-2-A, 9/6/2007)]
5. Compliance with the CO ppm<sub>dv</sub> emission limits shall be demonstrated through the use of the CO CEMS. [40 C.F.R. § 63.7525(a) and 06-096 C.M.R. ch. 115, BACT (A-327-77-1-N, 8/28/2006 & A-327-77-2-A, 9/6/2007)]
6. Compliance with the PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC lb/hr emission limits shall be demonstrated through stack testing in accordance with 40 C.F.R. Part 60, Appendix A upon request by the Department. [06-096 C.M.R. ch. 115, BACT (A-327-77-1-N, 8/28/2006 & A-327-77-2-A, 9/6/2007)]

DONE AND DATED IN AUGUSTA, MAINE THIS 21<sup>st</sup> DAY OF APRIL, 2022.

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: 3/17/2022

Date of application acceptance: 3/18/2022

Date filed with the Board of Environmental Protection:

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

