



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

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COMMISSIONER

**PRL Sanford, LLC
York County
Sanford, Maine
A-24-71-P-R/T (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Renewal and Transfer**

FINDINGS OF FACT

After review of the file and related materials submitted with regard to the license transfer application, the air emission license renewal application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., §344 and §590, and 06-096 Code of Maine Rules (CMR) 115 (as amended), the Maine Department of Environmental Protection (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

PRL Sanford, LLC has requested the transfer of Air Emission License A-24-71-O-R from New England Building Materials, LLC d/b/a Lavalley Lumber Company, LLC to PRL Sanford, LLC through a letter to the Bureau of Air Quality dated December 4, 2013. Air Emission License A-24-71-O-R was issued to New England Building Materials, LLC d/b/a Lavalley Lumber Company, LLC on February 12, 2009.

PRL Sanford, LLC (PRL) has applied to renew their Air Emission License permitting the operation of emission sources associated with their wood products facility. The equipment addressed in this license is located at 563 New Dam Road, Sanford, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type, % sulfur	Date of Manufacture	Date of Installation	Stack #
Boiler #1	33.5	7876 lb/hr	Wood	1980	1980	#1
Boiler #2	14.6	97.5 gal/hr	#2 or #6 Fuel Oil, 0.5%	1973	1995	#2

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

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

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

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

Generator

<u>Equipment</u>	<u>Max. Design Heat Input Capacity (MMBtu/hr)</u>	<u>Max. Output Capacity (kW)</u>	<u>Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Date of Manufacture / Installation</u>	<u>Stack #</u>
Generator #1	3.4	350	25	Diesel, 0.0015%	1951 / 1986	#3

Process Equipment

<u>Equipment</u>	<u>Production Rate</u>	<u>Dates of Manufacture and Installation</u>	<u>Pollution Control Equipment</u>
Wood Drying Kilns (7)	15 MMBF/yr	1980 - 2003	None

C. Application Classification

The application for PRL does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered a renewal of currently licensed emission units and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended). With the fuel use limits on Boilers #1 and #2 and Generator #1, the facility is licensed below the major source thresholds and is considered a synthetic minor stationary source of air emissions.

II. TRANSFER REQUIREMENTS

A. Title, Right, or Interest

In the application, copies of property deeds transferring ownership of the facility from New England Building Materials, LLC d/b/a Lavalley Lumber Company, LLC to PRL Sanford, LLC were submitted. The parties have provided sufficient evidence of title, right, or interest in the facility to allow the transfer of the facility's licenses.

B. Technical Capacity and Intent

The information submitted in the application provides sufficient evidence that PRL has the technical capacity and intent to comply with their air emission license.

C. Full Name and Address

The full name and address of the new owner is as follows:

PRL Sanford, LLC
563 New Dam Road
Sanford, Maine 04073

D. Certification

PRL certifies that there will be no increase in air emissions beyond that provided for in the existing license, either in quantity or type.

III. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

1. Best Practical Treatment (BPT)

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

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

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

2. Facility Description

The facility is a lumber and building materials manufacturing facility. Emission sources at the facility include a wood-fired boiler and associated fuel handling equipment, an oil-fired boiler and associated equipment, wood sawing and milling machines, a diesel-fired generator, and wood drying kilns.

B. Boiler #1

PRL operates Boiler #1 to supply steam and hot water for the facility. Boiler #1 is a Dutch oven-style boiler with a design heat input capacity of 33.5 MMBtu/hour firing waste wood. Boiler #1 is equipped with two multicyclone mechanical dust separators to control particulate emissions. This unit was manufactured in 1980 and exhausts through its own stack, Stack #1.

1. New Source Performance Standards (NSPS)

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

2. BPT Findings

The BPT emission limits for Boiler #1 are based on the following:

- PM – 0.30 lb/MMBtu; 06-096 CMR 103 (2)(B)(4)(a)
- PM₁₀ – 0.30 lb/MMBtu; derived from PM emission factor
- SO₂ – 0.025 lb/MMBtu; AP-42, Table 1.6-2, dated 9/03
- NO_x – 0.22 lb/MMBtu; AP-42, Table 1.6-2, dated 9/03
- CO – 0.60 lb/MMBtu; AP-42, Table 1.6-2, dated 9/03
- VOC – 0.017 lb/MMBtu; AP-42, Table 1.6-3, dated 9/03
- Visible Emissions – A-24-71-O-R (February 12, 2009), BPT

The BPT emission limits for the boiler are the following:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1 (33.5 MMBtu/hr) wood	10.05	10.05	0.84	7.37	20.1	0.57

Visible emissions from Boiler #1 shall not exceed 20% opacity on a six-minute block average, except for no more than two six-minute block averages in a three-hour period. [A-24-71-O-R (February 12, 2009), BPT]

PRL shall limit fuel firing in Boiler #1 to no more than 29,000 tons per year of wood fuel at 50% moisture or the equivalent, based on a 12-month rolling total. The facility shall maintain records documenting the monthly and 12-month rolling total of wood fuel fired in Boiler #1. [A-24-71-O-R (February 12, 2009), BPT]

3. Fuel Handling for Boiler #1

PRL utilizes a pneumatic blower system to transfer waste wood from the wood processing areas to a dust cyclone, designated Cyclone #1. Waste wood drops from Cyclone #1 onto a drag chain conveyor for transfer to the Boiler #1 fuel bin. A conveyor moves waste wood from the fuel bin to Boiler #1 to be burned. PRL also utilizes an outside shed for wood fuel storage. Wood fuel is moved into and out of the shed by bucket loader.

In accordance with 06-096 CMR 101, Section 2(B)(3)(d), visible emissions from the waste wood handling system, including the waste wood blower conveyor systems, Cyclone #1, the waste wood fuel bin, and the wood fuel storage shed, shall not exceed an opacity of 20% on a six-minute block average basis, except for no more than one six-minute block average in a one-hour period.

PRL shall employ a system of maintenance, inspection, and repair for the

waste wood handling system, which shall include inspection of the system on a monthly or more frequent basis. Compliance shall be documented by means of a maintenance, inspection, and repair log.

C. Boiler #2

PRL operates Boiler #2 to supply heat and hot water for the facility. Boiler #2 was manufactured by Cleaver Brooks with a design heat input capacity of 14.6 MMBtu/hour. PRL is licensed to fire #2 fuel oil and #6 fuel oil in Boiler #2. Boiler #2 exhausts through its own stack, Stack #2.

1. New Source Performance Standards (NSPS)

Due to its year of manufacture, Boiler #2 is not subject to the requirements of NSPS 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hour manufactured after June 9, 1989.

2. BPT Findings

The BPT emission limits for Boiler #2 were based on the following:

- PM, PM₁₀ – 0.12 lb/MMBtu; A-24-71-O-R (February 12, 2009), BPT
- SO₂ – 0.5 lb/MMBtu; based on firing fuel oil with sulfur content of 0.5% by weight
- NO_x – 55 lb/1000 gal based on AP-42, Table 1.3-1, dated 5/10 (for #6 fuel oil)
- CO – 5 lb/1000 gal based on AP-42, Table 1.3-1, dated 5/10
- VOC – 0.28 lb/1000 gal based on AP-42, Table 1.3-3, dated 5/10 (industrial boiler firing #6 fuel oil)
- Visible Emissions – A-24-71-O-R (February 12, 2009), BPT

The BPT emission limits for the boiler are the following:

<u>Unit</u>	<u>PM</u> <u>(lb/hr)</u>	<u>PM₁₀</u> <u>(lb/hr)</u>	<u>SO₂</u> <u>(lb/hr)</u>	<u>NO_x</u> <u>(lb/hr)</u>	<u>CO</u> <u>(lb/hr)</u>	<u>VOC</u> <u>(lb/hr)</u>
Boiler #2 (14.6 MMBtu/hr) #2 and #6 fuel oil	1.75	1.75	7.3	5.36	0.49	0.03

Visible emissions from Boiler #2 shall not exceed 20% opacity on a six-minute block average, except for no more than two six-minute block averages in a three-hour period.

3. Fuel Limits

PRL is limited to 450,000 gallons/year of fuel oil fired in Boiler #2, on a 12-month rolling total basis.

Prior to July 1, 2016, or by the date otherwise stated in 38 MRSA §603-A(2)(A)(3), the #2 fuel oil fired at the facility shall be ASTM D396 compliant #2 fuel oil (maximum sulfur content of 0.5% by weight). Per 38 MRSA §603-A(2)(A)(3), beginning July 1, 2016, or on the date specified in the statute, the #2 fuel oil fired at the facility shall have a maximum sulfur content of 0.005% by weight (50 ppm), and beginning January 1, 2018, or on the date specified in the statute, the #2 fuel oil fired at the facility shall have a maximum sulfur content of 0.0015% by weight (15 ppm). The specific dates contained in this paragraph reflect the current dates in the statute as of the effective date of this license; however, if the statute is revised, the facility shall comply with the revised dates upon promulgation of the statute revision.

As previously licensed, #6 fuel oil fired at the facility shall have a maximum sulfur content of 0.5% by weight. [A-24-71-O-R (February 12, 2009), BPT]

4. Periodic Monitoring

Periodic monitoring for Boiler #2 shall include recordkeeping to document fuel use both on a monthly and 12-month rolling total basis. Documentation shall include the type of fuel used in Boiler #2 and sulfur content of the fuel.

D. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 CFR Part 63 Subpart JJJJJ

Boilers #1 and #2 may be subject to the requirements of 40 CFR Part 63, Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*. Boiler #1 is considered an existing biomass-fired boiler, and Boiler #2 is considered an existing oil-fired boiler.

For informational purposes, a summary of the currently applicable federal 40 CFR Part 63 Subpart JJJJJ requirements is listed below. At this time, the Department has not taken delegation of this rule promulgated by EPA; however, PRL is still subject to the requirements. Notification forms and additional rule information can be found on the following website:

<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

1. Compliance Dates, Notifications, and Work Practice Requirements

a. Initial Notification of Compliance

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

b. Boiler Tune-Up Program

- (1) A boiler tune-up program shall be implemented to include the initial tune-up of applicable boilers no later than March 21, 2014. [40 CFR §63.11196(a)(1)]
- (2) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
 - (a) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hour or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hour, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [40 CFR §63.11223(b)(1)]
 - (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR §63.11223(b)(2)]
 - (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hour or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hour, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [40 CFR §63.11223(b)(3)]
 - (d) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR §63.11223(b)(4)]
 - (e) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, **before and after** adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR §63.11223(b)(5)]
 - (f) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR §63.11223(b)(7)]
- (3) After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 CFR §63.11225(a)(4) and 40 CFR §63.11214(b)]

(4) The facility shall implement a boiler tune-up program after the initial tune-up and initial compliance report (the Notification of Compliance Status) has been submitted.

(a) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler, as summarized in the following table:

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

[40 CFR §63.11223(a) and Table 2]

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

c. Energy Assessment

Boilers #1 and #2 may be subject to the energy assessment requirement as follows:

(1) A one-time energy assessment shall be performed by a qualified energy assessor on the applicable boilers no later than March 21, 2014. [40 CFR §63.11196(a)(3)]

- (2) The energy assessment shall include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the costs of specific improvements and benefits, and the time frame for recouping those investments. [40 CFR Part 63, Table 2(4)]
- (3) A Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 CFR §63.11225(a)(4) and 40 CFR §63.11214(c)]

2. Recordkeeping

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

Note: EPA will require submission of Notification of Compliance Status (NOCS) reports for tune-ups and energy assessments through their electronic reporting system. However, until the system is available to receive submittals, sources may submit the written NOCS to the EPA Administrator by mail. [40 CFR §63.1125(a)(4)(vi)]

E. Generator #1

PRL utilizes a 3.4 MMBtu/hour (350 kW) diesel generator for back-up and emergency power for the facility. Generator #1 was manufactured in 1951 and installed in 1986.

1. New Source Performance Standards (NSPS)

The federal regulation 40 CFR Part 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE)* is not applicable to Generator #1, since the unit was installed prior to the 2005 applicability date for 40 CFR Part 60, Subpart IIII.

2. BPT Findings

The BPT emission limits for Generator #1 are based on the following:

- PM, PM₁₀ - 0.12 lb/MMBtu; 06-096 CMR 103 (2)(B)(1)(a)
- SO₂ - 0.0015 lb/MMBtu; combustion of diesel fuel with maximum fuel sulfur content of 15 ppm (0.0015% sulfur by weight)
- NO_x - 4.41 lb/MMBtu; AP-42, Table 3.3-1, dated 10/96
- CO - 0.95 lb/MMBtu from AP-42 dated 10/96
- VOC - 0.36 lb/MMBtu from AP-42 dated 10/96
- Visible Emissions - 06-096 CMR 101 (2)(B)(1)(f)

The BPT emission limits for Generator #1 are the following:

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM₁₀ (lb/hr)</u>	<u>SO₂ (lb/hr)</u>	<u>NO_x (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
Generator #1 (3.4 MMBtu/hr) Diesel	0.41	0.41	0.005	15.00	3.23	1.22

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

3. Fuel and Documentation of Compliance

Generator #1 shall meet BPT through the firing of no greater than 25,000 gallons of diesel fuel with a maximum sulfur content of 0.0015% by weight.

PRL shall maintain a log for Generator #1 indicating the twelve-month rolling total of fuel oil fired in Generator #1 and supplier certification of the diesel fuel's sulfur content. The log shall also include documentation of the date, time, and reason for each time the generator is operated.

4. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 CFR Part 63, Subpart ZZZZ

Generator #1 is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. Under this regulation, PRL's

Generator #1 is considered an existing, emergency, stationary reciprocating internal combustion engine (RICE) located at an area source of hazardous air pollutants (HAP) emissions and which is not subject to NSPS regulations.

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

(1) The stationary RICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc.

(2) Paragraph (1) above notwithstanding, the emergency stationary RICE may be operated for any combination of the purposes specified below for a maximum of 100 hours per calendar year:

(i) Maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(ii) Emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, *Capacity and Energy Emergencies*, or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Periods where there is a deviation of voltage or frequency of 5% or greater below standard voltage or frequency.

(3) Paragraphs (1) and (2) above notwithstanding, emergency stationary RICE may be operated for up to 50 hours per calendar year in non-emergency situations. These 50 hours are counted as part of the 100 hours per calendar year for maintenance checks and readiness testing,

emergency demand response, and periods of voltage deviation or low frequency, as provided in paragraph (2) above.

The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supplying power as part of a financial arrangement with another entity, except as provided in the following paragraphs:

- (i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution center.
- (ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
 - (a) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
 - (b) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - (c) The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.
 - (d) The power is provided only to the facility itself or to support the local transmission and distribution system.
 - (e) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

Generator #1 shall be limited to the usage outlined in 40 CFR §63.6640(f) and therefore may be classified as an existing emergency stationary RICE as defined in 40 CFR Part 63, Subpart ZZZZ. Failure to comply with all of the requirements listed in 40 CFR §63.6640(f) may cause this engine to not be considered an emergency engine and therefore subject to all the requirements for a non-emergency engine.

b. 40 CFR Part 63, Subpart ZZZZ Requirements

(1) *Operation and Maintenance Requirements*

PRL shall conduct the following operational practices for Generator #1:

- (a) Change the oil and filter every 500 hours of operation or annually, whichever comes first;
- (b) Inspect the air cleaner every 1000 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.

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

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

Generator #1 shall be operated and maintained according to the manufacturer's emission-related written instructions, or PRL shall develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]

(2) *Optional Oil Analysis Program*

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

(3) *Non-Resettable Hour Meter Requirement*

A non-resettable hour meter shall be installed and operated on Generator #1. [40 CFR §63.6625(f)]

(4) *Startup Idle and Startup Time Minimization Requirements*

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

(5) *Annual Time Limit for Maintenance and Testing*

Generator #1 shall each be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations. (This does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supplying power as part of a financial arrangement with another entity unless the conditions in 40 CFR §63.6640(f)(4)(ii) are met.) [40 CFR §63.6640(f)]

(6) *Recordkeeping*

PRL shall keep records of maintenance conducted on Generator #1 and the hours of operation of the unit recorded from the non-resettable hour meter. PRL shall document the hours of operation for non-emergency purposes and the hours of operation for emergency purposes, including what classified the use as emergency. If Generator #1 is operated during a period of demand response or deviation from standard voltage or frequency, or for supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in 40 CFR §63.6640(f)(4)(ii), PRL shall keep records of the notification of the emergency situation and the date, start time, and end time of Generator #1 operation for these purposes. [40 CFR §63.6655(e) and (f)]

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

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

Director, Office of Ecosystem Protection
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, MA 02109-3912

[40 CFR §63.6650(h)]

F. Wood Drying Kilns

PRL uses seven wood drying kilns to dry lumber produced at the facility. Five of the seven wood drying kilns are box kilns with volumes of 60,000 boardfeet (BF) each. The other two are box kilns with volumes of 30,000 BF each. Most of the lumber dried in the kilns is Eastern White Pine. Using the emission factor of 2.26 pounds of VOC per 1000 board feet for white pine [from NCASI *Emissions From Lumber Drying*, Technical Bulletin 718 (07/1996)] and the annual drying production from the Wood Drying Kilns of approximately 15.0 million BF per year, PRL emits approximately 17.0 tons of VOC per year from the kiln drying process.

To allow for production flexibility, PRL shall be restricted to 25.0 tons of VOC emissions per year from kiln drying operations, based on a 12-month rolling total. To demonstrate compliance, PRL shall maintain records of the quantity of wood dried in the kilns, by species; drying dates; and calculated VOC emissions, determined monthly using the equation given below. In the equation, VOC emissions (in lb/month) from kiln-drying of Eastern White Pine are designated as VOC_{pine} .

To Determine *Monthly* VOC Emissions from Kiln-Drying of Eastern White Pine

$$VOC_{\text{pine}} \text{ (lb/month)} = 2.26 \text{ (lb per thousand-board-feet)} \\ \times \# \text{ (throughput, in thousand-board-feet of pine per month)}$$

The record of calculated VOC emissions from the Wood Drying Kilns shall be maintained on both a monthly basis and a 12-month rolling total basis.

G. Fugitive Emissions

Visible emissions from any fugitive emission source, including stockpiles and roadways, shall not exceed 20% opacity, except for up to five minutes in any one-hour period. Compliance shall be determined by an aggregate of the individual 15-second opacity observations which exceed 20% in any one hour.

H. General Process Emissions

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

I. Annual Emissions

1. Total Annual Emissions

PRL shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits were calculated based on the following:

- Boiler #1: annual fuel use limit of 29,000 tons/year of wood at a moisture content of 50.0%, or the equivalent (heating value of 4,500 Btu/lb)
- Boiler #2: annual fuel use limit of 450,000 gal/year of fuel oil
- Generator #1: annual fuel use limit of 25,000 gallons/year diesel fuel

Total Licensed Annual Emissions for the Facility

Tons/year

(used to calculate the annual license fee)

	PM	PM₁₀	SO₂	NO_x	CO	VOC
Boiler #1 (wood-fired)	39.2	39.2	3.3	28.7	78.3	2.2
Boiler #2 (oil-fired)	4.0	4.0	16.8	12.1	1.1	0.1
Generator #1(diesel)	0.2	0.2	0.1	7.5	1.6	0.6
Wood Drying Kilns	--	--	--	--	--	25.0
Total TPY	43.4	43.4	20.2	48.3	81.0	27.9

Total emissions from the facility of any single HAP shall be less than 10 TPY; and total emissions from the facility of all HAP combined shall be less than 25 TPY.

2. Greenhouse Gases

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

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

IV. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source shall be determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient air quality impact analysis is not required for a minor source if the total emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM ₁₀	25
SO ₂	50
NO _x	50
CO	250

The total facility licensed emissions are above at least one of the emission levels contained in the table above; however, after taking into consideration the following factors:

- similarity with other licensed sources based on size, emissions, and local topography;
- location, including proximity to other sources, complex terrain, and Class I areas; and
- background air quality data available in or representative of the local area;

The Department has determined that an ambient air quality impact analysis is not required for the facility and that Ambient Air Quality Standards (AAQS) will not be exceeded.

ORDER

Based on the above, the Department concludes that the applicant for the air emission license transfer has the capacity to satisfy all applicable statutory criteria and hereby APPROVES the transfer of Air Emission License A-24-71-O-R, from New England Building Materials, LLC d/b/a Lavalley Lumber Company, LLC to PRL Sanford, LLC, subject to all conditions attached to it.

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

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

The Department hereby grants Air Emission License A-24-71-P-R/T subject to the following conditions.

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

STANDARD CONDITIONS

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

for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]

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

of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

- B. The days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
- C. The licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 CMR 115]

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

SPECIFIC CONDITIONS

(16) Boiler #1

A. PRL shall limit fuel firing in Boiler #1 to no more than 29,000 tons per year of wood fuel at 50% moisture or the equivalent, based on a 12-month rolling total. The facility shall maintain records documenting the monthly and 12-month rolling total of wood fuel fired in Boiler #1. [A-24-71-O-R (February 12, 2009), BPT]

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

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1 (33.5 MMBtu/hr) wood	PM	0.30	06-096 CMR 103(2)(B)(4)(a)

C. Emissions from Boiler #1 shall not exceed the following [06-096 CMR 115, BPT]:

Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1 (33.5 MMBtu/hr) wood	10.05	10.05	0.84	7.37	20.1	0.57

D. Visible emissions from Boiler #1 shall not exceed 20% opacity on a six-minute block average, except for no more than two six-minute block averages in a three-hour period. [A-24-71-O-R (February 12, 2009), BPT]

(17) Boiler #2

A. PRL is licensed to fire either #2 fuel oil or #6 fuel oil in Boiler #2.

1. PRL is limited to 450,000 gallons/year of total fuel oil fired in Boiler #2, on a 12-month rolling total basis. [06-096 CMR 115, BPT]
2. Prior to July 1, 2016, or the date specified in 38 MRSA §603-A(2)(A)(3), the #2 fuel oil fired in the boiler shall be ASTM D396 compliant (max. sulfur content of 0.5% by weight). [06-096 CMR 115, BPT]
3. Beginning July 1, 2016, or on the date specified in 38 MRSA §603-A(2)(A)(3), the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm). [38 MRSA §603-A(2)(A)(3)]
4. Beginning January 1, 2018, or on the date specified in 38 MRSA §603-A(2)(A)(3), the facility shall fire #2 fuel oil with a maximum sulfur

content limit of 0.0015% by weight (15 ppm). [38 MRSA §603-A(2)(A)(3)]

5. The #6 fuel oil fired at the facility shall have a maximum sulfur content of 0.5% by weight. [A-24-71-O-R (February 12, 2009), BPT]
6. Compliance shall be demonstrated by fuel records from the supplier showing the quantity, type, and the percent sulfur of the fuel delivered. Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 CMR 115, BPT]

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

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #2 (14.6 MMBtu/hr) #2 and #6 fuel oil	1.75	1.75	7.3	5.36	0.49	0.03

[06-096 CMR 115, BPT]

C. Visible emissions from Boiler #2 shall not exceed 20% opacity on a six-minute block average, except for no more than two six-minute block averages in a three-hour period. [06-096 CMR 101]

(18) Boilers #1 and #2: 40 CFR Part 63, Subpart JJJJJ

A. PRL shall comply with the applicable initial notification requirements of 40 CFR Part 63, Subpart JJJJJ by submitting an Initial Notification to EPA no later than January 20, 2014. [40 CFR §63.11225(a)(2) and 06-096 CMR 115, BPT]

B. Boiler Tune-Ups

1. PRL shall implement and carry out a boiler tune-up program for Boilers #1 and #2 in accordance with the applicable tune-up requirements of 40 CFR Part 63, Subpart JJJJJ.

The initial tune-up shall be conducted no later than March 21, 2014, on each boiler, in accordance with the applicable components and procedures as specified in 40 CFR §63.11223(b). Where specific tune-up requirements of Subpart JJJJJ do not apply directly to the wood-fired Boiler #1, the Department will work with PRL to establish appropriate components and procedures of the tune-up.

[40 CFR §63.11196(a)(1) and 06-096 CMR 115, BPT]

2. Each boiler shall undergo tune-ups every two years, in accordance with the tune-up frequency requirements of Subpart JJJJJ. [40 CFR §63.11223(a) and Table 2; and 06-096 CMR 115, BPT]
- C. After conducting the initial boiler tune-up on Boiler #1 and Boiler #2, a Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 CFR §63.11225(a)(4); 40 CFR §63.11214(b); and 06-096 CMR 115, BPT]
- D. The tune-up compliance report for each boiler shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the concentration of CO in the effluent stream (ppmv) and oxygen in volume percent, measured at high fire or typical operating load, before and after the boiler tune-up; a description of any corrective actions taken as part of the tune-up of the boiler; and the types and amounts of fuels used over the 12 months prior to the tune-up of the boiler. [40 CFR §63.11223(b)(6)] The compliance report shall also include the company name and address; a compliance statement signed by a responsible official certifying truth, accuracy, and completeness; and a description of any deviations and corrective actions. [40 CFR §63.11225(b) and 06-096 CMR 115, BPT]
- E. Energy Assessment
1. A one-time energy assessment shall be performed by a qualified energy assessor on the applicable boilers no later than March 21, 2014. [40 CFR §63.11196(a)(3) and 06-096 CMR 115, BPT]
 2. The energy assessment shall include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the costs of specific improvements and benefits, and the time frame for recouping those investments. [40 CFR Part 63, Table 2(4) and 06-096 CMR 115, BPT]
 3. A Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 CFR §63.11225(a)(4); 40 CFR §63.11214(c); and 06-096 CMR 115, BPT]

F. Records shall be maintained consistent with the requirements of 40 CFR Part 63, Subpart JJJJJ including the following [40 CFR §63.11225(c)]: copies of notifications and reports with supporting compliance documentation; identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation. Records shall be in a form suitable and readily available for expeditious review. [06-096 CMR 115, BPT]

(19) **Generator #1**

A. Fuel

1. Generator #1 shall fire no greater than 25,000 gallons/year of diesel fuel with a maximum sulfur content of 0.0015% by weight. [A-24-71-O-R (February 12, 2009), BPT]
2. PRL shall maintain a log for Generator #1 indicating the twelve-month rolling total of diesel fuel fired in Generator #1 and supplier certification of the diesel fuel's sulfur content. The log shall also include documentation of the date, time, and reason for each time the generator is operated. [06-096 CMR 115, BPT]
3. Compliance with the fuel sulfur content limit shall be demonstrated by fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 CMR 115, BPT]

B. Emissions from Generator #1 shall not exceed the following:

Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #1 (3.4 MMBtu/hr) Diesel	0.41	0.41	0.005	15.00	3.23	1.22

[06-096 CMR 115, BPT]

- C. Visible emissions from Generator #1 shall not exceed 30% opacity on a six-minute block average basis, except for no more than two six-minute block averages in a three-hour period. [06-096 CMR 101]
- D. Generator #1 shall meet the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, including the following:

1. PRL shall conduct the following operational practices for Generator #1:
 - a. Change the oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect the air cleaner every 1000 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.

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

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

2. Generator #1 shall be operated and maintained according to the manufacturer's emission-related written instructions, or PRL shall develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]

3. Oil Analysis Program Option

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

4. Non-Resettable Hour Meter

A non-resettable hour meter shall be installed and operated on Generator #1. [40 CFR §63.6625(f)]

5. Annual Time Limit for Maintenance and Testing

Generator #1 shall be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations. (This does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supplying power as part of a financial arrangement with another entity unless the conditions in §63.6640(f)(4)(ii) are met.) [40 CFR §63.6640(f)]

6. Recordkeeping

PRL shall keep records of maintenance conducted on Generator #1 and the hours of operation of the unit recorded from the non-resettable hour meter. PRL shall document the hours of operation for non-emergency purposes and the hours of operation for emergency purposes, including what classified the use as emergency. If Generator #1 is operated during a period of demand response or deviation from standard voltage or frequency, or for supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in 40 CFR §63.6640(f)(4)(ii), PRL must keep records of the notification of the emergency situation and the date, start time, and end time of generator operation for these purposes. [40 CFR §63.6655(e) and (f)]

7. Startup Idle and Startup Time Minimization

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

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

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

Director, Office of Ecosystem Protection
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, MA 02109-3912

[40 CFR §63.6650(h)]

(20) **Wood Drying Kilns**

- A. Emissions of VOC from the Wood Drying Kilns shall not exceed 25.0 tons/year, based on a 12-month rolling total. [A-24-71-O-R (February 12, 2009), BPT]
- B. PRL shall maintain records of the quantity of wood dried in the kilns, by species; drying dates; and calculated VOC emissions, determined monthly using the equation given below. In the equation, VOC emissions (in lb/month) from kiln-drying of Eastern White Pine are designated as VOC_{pine} .

$$VOC_{\text{pine}} \text{ (lb/month)} = 2.26 \text{ (lb per thousand-board-feet)} \\ \times \# \text{ (throughput, in thousand-board-feet of pine per month)}$$

The record of calculated VOC emissions from the Wood Drying Kilns shall be maintained on both a monthly basis and a 12-month rolling total basis.

[A-24-71-O-R (February 12, 2009), BPT]

(21) **Fugitive Emissions**

Visible emissions from any fugitive emission source, including stockpiles and roadways, shall not exceed 20% opacity, except for up to five minutes in any one-hour period. Compliance shall be determined by an aggregate of the individual 15-second opacity observations which exceed 20% in any one hour. [06-096 CMR 101]

(22) **General Process Sources**

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

(23) **Annual Emission Statement**

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

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

PRL Sanford, LLC
York County
Sanford, Maine
A-24-71-P-R/T (SM)

28

**Departmental
Findings of Fact and Order
Air Emission License
Renewal and Transfer**

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

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

DONE AND DATED IN AUGUSTA, MAINE THIS 29 DAY OF January, 2014.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:

Marc Allen Robert Cone for
PATRICIA W. AHO, COMMISSIONER

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

[Note: If a renewal application which is determined by the Department as complete is submitted prior to expiration of this license, then pursuant to Title 5 MRSA §10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: December 6, 2013

Date of application acceptance: December 9, 2013

Date filed with the Board of Environmental Protection:

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

