



DEPARTMENT ORDER

**Hardwood Products Company LLC
Piscataquis County
Guilford, Maine
A-328-71-L-R**

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

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

Hardwood Products Company LLC (HPC) has applied to renew their Air Emission License for the operation of emission sources associated with their wood products manufacturing facility.

In addition, HPC has requested the removal of the fuel caps from Boilers #1 and #2 and the Package Boiler, and that their licensed recordkeeping format be changed from a 12-month rolling total to a calendar year basis.

The equipment addressed in this license is located at 31 School Street in Guilford, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

<u>Equipment</u>	<u>Max. Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type, % sulfur</u>	<u>Date of Manuf.</u>	<u>Date of Install.</u>	<u>Stack #</u>
Boiler #1	13.9	* 3,170 lb/hr	Wood, negl.	1913	1913	1
Boiler #2	13.9	* 3,170 lb/hr	Wood, negl.	1937	1937	1
Package Boiler	2.8	19.8 gal/hr	Distillate Fuel, 0.0015%	1985	1985	2

* Assumes wood fuel with a 33% moisture content having a heating value of 6,030 Btu/lb

Process Equipment

<u>Equipment</u>	<u>Pollution Control Equipment</u>	<u>Stack #</u>
Pneumatic Conveyors (6)	Cyclones	4-9
Degreaser Units (4)	--	--

C. Definitions

Biomass means any biomass-based solid fuel that is not a solid waste. This includes, but is not limited to, wood residue; wood products (e.g., trees, tree stumps, tree limbs, bark, lumber, sawdust, sander dust, chips, scraps, slabs, millings, and shavings); animal manure, including litter and other bedding materials; vegetative agricultural and silvicultural materials, such as logging residues (slash), nut and grain hulls and chaff (e.g., almond, walnut, peanut, rice, and wheat), bagasse, orchard prunings, corn stalks, coffee bean hulls and grounds. This definition also includes wood chips and processed pellets made from wood or other forest residues. Inclusion in this definition does not constitute a determination that the material is not considered a solid waste. HPC should consult with the Department before adding any new biomass type to its fuel mix.

Distillate Fuel means the following:

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

D. Application Classification

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

The application for HPC does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of currently licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115.

E. Facility Description

HPC manufactures two lines of wooden products: Puritan and Gold Bond. The Puritan tradename is used for the line of medical wooden supplies manufactured at their facility, while the Gold Bond tradename is used to represent the food grade wooden supplies that they produce. The boilers and ancillary equipment that are covered by this air emission license are used to support the operation of both of these production lines.

F. Facility Classification

HPC is licensed as follows:

- As a natural minor source of air emissions, because no license restrictions are necessary to keep the facility's emissions below major source thresholds for criteria pollutants; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

II. **BEST PRACTICAL TREATMENT (BPT)**

A. Introduction

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

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

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

B. Boilers #1 and #2

HPC operates Boilers #1 and #2 for steam and heat to support the facility operations. The boilers are each rated at 13.9 MMBtu/hr and both fire wood fuel. Boilers #1 and #2 were installed in 1913 and 1937, respectively, and exhaust through a common stack that discharges 80 feet above ground level. HPC operates multiclones on both Boilers #1 and #2 for control of their particulate matter emissions.

Wood byproducts from manufacturing processes are used as fuel for Boilers #1 and #2 by first running them through a hammermill hog to pulverize the byproducts into smaller pieces to promote more uniform and consistent combustion. The pulverized wood byproducts are then burned in the two horizontal return tube boilers which use automatic controls to monitor performance and maximize their efficiency.

1. BPT Findings

The BPT emission limits for Boilers #1 and #2 were based on the following:

Wood Fuel

PM/PM ₁₀	– 0.55 lb/MMBtu, 06-096 C.M.R. ch. 103(2)(A)(3)(a)
SO ₂	– 0.025 lb/MMBtu, AP-42, Table 1.6-2, dated 09/03
NO _x	– 0.49 lb/MMBtu, AP-42, Table 1.6-2, dated 09/03
CO	– 0.60 lb/MMBtu, AP-42, Table 1.6-2, dated 09/03
VOC	– 0.017 lb/MMBtu, AP-42, Table 1.6-3, dated 09/03
Visible Emissions	– 06-096 C.M.R. ch. 115, BPT

The BPT emission limits for Boilers #1 and #2 are the following:

Unit	Pollutant	lb/MMBtu
Boiler #1	PM	0.55
Boiler #2	PM	0.55

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1 13.9 MMBtu/hr Wood Fuel	7.66	7.66	0.35	6.81	8.34	0.24
Boiler #2 13.9 MMBtu/hr Wood Fuel	7.66	7.66	0.35	6.81	8.34	0.24

Visible emissions from Boilers #1 and #2 shall not exceed 30% opacity from the common stack, recorded as six (6) minute block averages, except for periods of startup, shutdown, or malfunction during which time the unit operator may elect to comply with the following work practice standards of Section 3(A) of 06-096 C.M.R. ch. 101, *Visible Emissions Regulation*, in lieu of this visible emission standard.

- a. The unit operator shall maintain a log (written or electronic) of the date, time, and duration of all startups, shutdowns, malfunctions, or equipment maintenance of any unit or its associated air pollution control equipment which result in the operator electing to comply with this section.
- b. The unit operator shall develop and implement a written startup and shutdown plan.

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

2. Control Equipment

HPC shall continue their existing program for the periodic inspection, maintenance, and repair of the centrifugal separators and associated hoppers on Boilers #1 and #2. HPC shall perform inspections at least once per month and shall keep a maintenance log documenting all inspections, routine and non-routine maintenance performed, and the dates that the work was done.

3. Periodic Monitoring

Periodic monitoring for Boilers #1 and #2 shall include recordkeeping to document their operating hours, to be tracked on a monthly and calendar year basis. The operating hours are necessary for calculating the boilers' annual emissions for reporting, as required by 06-096 C.M.R. ch. 137, *Emission Statements*.

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

Boilers #1 and #2 were both installed prior to 1989 and therefore 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 that were 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 JJJJJ

Boilers #1 and #2 are both subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ. Each of the units is categorized as an existing industrial biomass boiler that is located at an area source of hazardous air pollutants. [40 C.F.R. §§63.11193 and 63.11200]

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

a. Compliance Dates, Notifications, and Work Practice Requirements

(1) Initial Notification of Compliance

An Initial Notification submittal to EPA was due no later than January 20, 2014. [40 C.F.R. § 63.11225(a)(2)] HPC mailed their Initial Notification to EPA on January 17, 2014

(2) Boiler Tune-Up Program

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

(ii) Based on their size, age, and operation, Boilers #1 and #2 shall each have a tune-up conducted at least once every two years.

[40 C.F.R. § 63.11223(a) and Table 2]

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

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]
2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]
3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]
6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 C.F.R. § 63.11223(b)(7)]

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

(3) Compliance Report

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

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

3. "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

(4) Energy Assessment

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

- (i) A one-time energy assessment was required to be performed by a qualified energy assessor on the applicable boilers no later than March 21, 2014. [40 C.F.R. § 63.11196(a)(3)] The one-time energy assessments for Boilers #1 and #2 were both completed on April 1, 2014.
- (ii) Each boiler's energy assessment was required to 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 cost of specific improvements, benefits, and the time frame for recouping those investments. [40 C.F.R. Part 63, Subpart JJJJJ, Table 2(16)]
- (iii) A Notification of Compliance Status was required to be submitted to EPA no later than July 19, 2014. [40 C.F.R. § 63.11225(a)(4) and 40 C.F.R. § 63.11214(c)]

b. Recordkeeping

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

- (1) Copies of notifications and reports with supporting compliance documentation;
- (2) 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;

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

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

C. Package Boiler (formerly licensed as Boiler #3)

The Package Boiler is used primarily for facility hot water needs. The boiler is rated at 2.8 MMBtu/hour, was installed in 1985, and exhausts through its own stack which is designated as Stack #2.

The Package Boiler is licensed to fire only distillate fuel having a maximum sulfur content of 0.0015% by weight (15 ppm). To demonstrate compliance, HPC shall maintain fuel delivery records from the supplier showing the percent sulfur of the fuel delivered.

1. BPT Findings

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

Distillate Fuel

PM/PM ₁₀	– 0.12 lb/MMBtu, based on 06-096 C.M.R. ch. 103
SO ₂	– based on firing distillate fuel with a maximum sulfur content of 0.0015% by weight
NO _x	– 0.3 lb/MMBtu, from previous air license A-328-71-I-R, dated April 24, 2006
CO	– 5 lb/1000 gal, AP-42, Table 1.3-1, dated 05/10
VOC	– 0.2 lb/1000 gal, AP-42, Table 1.3-3, dated 05/10
Visible Emissions	– 06-096 C.M.R. ch. 115, BPT

The BPT emission limits for the Package Boiler are the following:

Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Package Boiler 2.8 MMBtu/hr Distillate Fuel	0.33	0.33	0.01	0.83	0.10	0.01

Visible emissions from the Package Boiler shall not exceed 20% opacity from Stack #2 recorded as six (6) minute block averages, except for periods of startup, shutdown, or malfunction during which time the unit operator may elect to comply with the following work practice standards of Section 3(A) of 06-096 C.M.R. ch. 101, *Visible Emissions Regulation*, in lieu of this visible emission standard.

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

2. Periodic Monitoring

Periodic monitoring for the Package Boiler shall include recordkeeping to document fuel use on both a monthly and calendar year basis. This information is necessary to calculate the Package Boiler's annual emissions for reporting, pursuant to the emissions inventory requirements contained in *Emission Statements*, 06-096 C.M.R. ch. 137.

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

The Package Boiler has a maximum heat input value of less than 10 MMBtu/hr and was installed in 1985. Therefore, it is 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]

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

The Package Boiler is subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ. The unit is considered to be an existing industrial oil-fired boiler located at an area source of hazardous air pollutants. [40 C.F.R. §§63.11193 and 63.11200]

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

a. Compliance Dates, Notifications, and Work Practice Requirements

(1) Initial Notification of Compliance

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

(2) Boiler Tune-Up Program

- (i) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]
- (ii) HPC shall conduct tune-ups on the Package Boiler at least every five (5) years. [40 C.F.R. § 63.11223(a) and Table 2]
- (iii) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hour, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 C.F.R. § 63.11223(b)(1)]
2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]

3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hour, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 C.F.R. § 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]
6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 C.F.R. § 63.11223(b)(7)]

(iv) Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:

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

(v) After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 C.F.R. § 63.11225(a)(4) and 40 C.F.R. § 63.11214(b)]

(3) Compliance Report

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

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

b. Recordkeeping

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

- (1) Copies of notifications and reports with supporting compliance documentation;
- (2) 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;
- (3) Records of the occurrence and duration of each malfunction of each applicable boiler; and
- (4) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

D. Process Equipment

HPC utilizes a pneumatic conveying system to transport wood material throughout the mill. Particulate emissions from the pneumatic conveyors are controlled by a number of cyclones, each of which exhausts through its own stack. This equipment is itemized as follows:

Unit ID	Type of Equipment	Manufacture Date	Stack #	Control Device
1	Pneumatic Conveyor	1959	4	Cyclone
2	Pneumatic Conveyor	1959	5	Cyclone
3	Pneumatic Conveyor	1990	6	Cyclone
4	Pneumatic Conveyor	1976	7	Cyclone
5	Pneumatic Conveyor	1964	8	Cyclone
6	Pneumatic Conveyor	1966	9	Cyclone

Visible emissions from the process equipment, including the pneumatic conveyors, cyclones and associated piping, shall not exceed 20% opacity recorded as six (6) minute block averages, except for periods of startup, shutdown, or malfunction during which time the unit operator may elect to comply with the following work practice standards of Section 3(A) of 06-096 C.M.R. ch. 101, *Visible Emissions Regulation*, in lieu of this visible emission standard.

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

E. Parts Washers

HPC has four parts washers (degreasers) at their facility, each having a design capacity of 15 gallons and each using distillates (100% VOC) as their solvent. The four parts washers are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130, and HPC shall keep records that document their compliance with this rule.

This equipment is exempt from *Industrial Cleaning Solvents*, 06-096 C.M.R. ch. 166 per Section (3)(B).

F. Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity on a five-minute block average basis.

G. Emissions Statement

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

1. The amount of distillate fuel fired in the Package Boiler on a monthly basis;
2. The sulfur content of the distillate fuel fired in the Package Boiler;
3. The hours of operation for Boilers #1 and #2 each, on an annual basis; and
4. Calculations of the VOC and/or HAP emissions from the Parts Washers on a calendar year total basis.

Because the moisture content of the wood fuel fired in Boilers #1 and #2 is not tracked by the facility, HPC shall calculate their PM and NO_x emissions for their annual emission statement using the following formulas:

Formulas for Boilers #1 and #2 only

$$PM \text{ emissions} = \text{Boiler Operating Hours} \times \frac{0.551 \text{ lb}}{MMBtu} \times \frac{13.9 \text{ MMBtu}}{hr} \div \frac{2000 \text{ lb}}{\text{Ton}}$$

$$NO_x \text{ emissions} = \text{Boiler Operating Hours} \times \frac{0.49 \text{ lb}}{MMBtu} \times \frac{13.9 \text{ MMBtu}}{hr} \div \frac{2000 \text{ lb}}{\text{Ton}}$$

The PM formula assumes that Boilers #1 and #2 are operating at 100% capacity and utilizes an emission factor from 06-096 C.M.R. ch. 103(2)(A)(3)(a) that does not consider the moisture content of the fuel.

The NO_x formula also assumes that Boilers #1 and #2 are operating at 100% capacity and uses an emission factor from AP-42 Table 1.6-2 that assumes the higher of the two available emission factors for wood residue combustion.

Emissions from the Package Boiler shall be calculated based on its actual fuel usage and applicable emission factors.

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

H. Annual Emissions

Total Annual Emissions

HPC shall be restricted to the following annual emissions, tracked on a calendar year basis. The tons per year limits were calculated based on 8,760 hours per year of operation, with no fuel limits on Boilers #1 and #2 or the Package Boiler.

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

	PM	PM₁₀	SO₂	NO_x	CO	VOC
Boilers #1 and #2	67.1	67.1	3.0	59.7	73.1	2.1
Package Boiler	1.5	1.5	0.1	3.6	0.4	0.1
Total TPY	68.6	68.6	3.1	63.3	73.5	2.2

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by case basis. In accordance with 06-096 C.M.R. ch. 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual 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

HPC previously submitted an ambient air quality impact analysis for air emission license A-328-71-H-M/R dated April 30, 2001, demonstrating that emissions from the facility, in conjunction with all other sources, do not violate Ambient Air Quality Standards (AAQS). An additional air quality impact analysis is not required for this renewal.

ORDER

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

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

The Department hereby grants Air Emission License A-328-71-L-R 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. § 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S. § 353-A. [06-096 C.M.R. ch. 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:
- A. Perform stack testing 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 C.F.R. Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - C. Submit a written report to the Department within thirty (30) days from date of test completion.
[06-096 C.M.R. ch. 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 C.F.R. Part 60 or other method approved or required by the Department; and
 - B. The days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

- C. The licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
[06-096 C.M.R. ch. 115]
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 C.M.R. ch. 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 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 C.M.R. ch. 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 C.M.R. ch. 115]

SPECIFIC CONDITIONS

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

- A. Boilers #1 and #2 shall fire wood fuel exclusively. [06-096 C.M.R. ch. 115, BPT]
- B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boilers #1 and #2	PM	0.55	06-096 C.M.R. ch. 103(2)(A)(3)(a)

C. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Emission Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	7.66	7.66	0.35	6.81	8.34	0.24
Boiler #2	7.66	7.66	0.35	6.81	8.34	0.24

D. Control Equipment

HPC shall continue their existing program for the periodic inspection, maintenance, and repair of the centrifugal separators and associated hoppers on Boilers #1 and #2. HPC shall perform inspections at least once per month and shall keep a maintenance log documenting all inspections, routine and non-routine maintenance performed, and the dates that the work was done. [06-096 C.M.R. ch. 115, BPT]

E. HPC shall keep records to track and document the operating hours for Boilers #1 and #2, to be maintained on a monthly and calendar year basis. [06-096 C.M.R. ch. 115, BPT]

F. Visible emissions from Boilers #1 and #2 shall not exceed 30% opacity from the common stack, recorded as six (6) minute block averages, except for periods of startup, shutdown, or malfunction during which time the unit operator may elect to comply with the following work practice standards of Section 3(A) of 06-096 C.M.R. ch. 101, *Visible Emissions Regulation*, in lieu of this visible emission standard.

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

G. HPC shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJ applicable to Boilers #1 and #2 including, but not limited to, the following: [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]
 - a. Boilers #1 and #2 shall each have a tune-up conducted at least once every two years. [40 C.F.R. § 63.11223(a) and Table 2]
 - b. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
 - (1) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]
 - (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]
 - (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]
 - (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
 - (5) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]
 - (6) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 C.F.R. § 63.11223(b)(7)]
 - c. Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:

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

2. Compliance Report

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

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

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

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

(17) **Package Boiler**

A. Fuel

1. The Package Boiler shall fire distillate fuel exclusively. [06-096 C.M.R. ch. 115, BPT]
2. The facility shall not purchase or otherwise obtain distillate fuel for firing in the Package Boiler having a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [06-096 C.M.R. ch. 115, BPT]
3. Compliance shall be demonstrated by fuel records from the supplier showing the percent sulfur of the fuel delivered. [06-096 C.M.R. ch. 115, BPT]
4. Records of annual fuel use shall be kept on both a monthly and a calendar year total basis. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Package Boiler	PM	0.12	06-096 C.M.R. ch. 103(2)(B)(1)(a)

C. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Emission Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Package Boiler Distillate Fuel 2.8 MMBtu/hr	0.33	0.33	0.01	0.83	0.10	0.01

D. Visible emissions from Visible emissions from the Package Boiler shall not exceed 20% opacity from Stack #2 recorded as six (6) minute block averages, except for periods of startup, shutdown, or malfunction during which time the unit operator may elect to comply with the following work practice standards of Section 3(A) of 06-096 C.M.R. ch. 101, *Visible Emissions Regulation*, in lieu of this visible emission standard.

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

E. HPC shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJ applicable to the Package Boiler including, but not limited to, the following: [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]
 - a. The Package Boiler shall have a tune-up conducted at least once every five years. [40 C.F.R. § 63.11223(a) and Table 2]
 - b. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

- (1) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hour, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 C.F.R. § 63.11223(b)(1)]
 - (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]
 - (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hour, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 C.F.R. § 63.11223(b)(3)]
 - (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
 - (5) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]
 - (6) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 C.F.R. § 63.11223(b)(7)]
- c. Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:
- (1) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
 - (2) A description of any corrective actions taken as part of the tune-up of the boiler; and

- (3) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

2. Compliance Report

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

- a. Company name and address;
 - b. A statement of whether the source has complied with all the relevant requirements of this Subpart;
 - c. A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
 - d. The following certifications, as applicable:
 - (1) "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
 - (2) "No secondary materials that are solid waste were combusted in any affected unit."
 - (3) "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."
3. Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJ including the following [40 C.F.R. § 63.11225(c)]:
 - a. Copies of notifications and reports with supporting compliance documentation;

- b. Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
- c. Records of the occurrence and duration of each malfunction of each applicable boiler; and
- d. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

(18) Process Equipment

Visible emissions from the process equipment, including pneumatic conveyors and cyclones, shall not exceed 20% opacity recorded as six (6) minute block averages, except for periods of startup, shutdown, or malfunction during which time the unit operator may elect to comply with the following work practice standards of Section 3(A) of 06-096 C.M.R. ch. 101, *Visible Emissions Regulation*, in lieu of this visible emission standard.

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

(19) **Parts Washers**

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

- A. HPC shall keep records of the amount of solvent added to each parts washer. [06-096 C.M.R. ch. 115, BPT]
- B. The following are exempt from the requirements of 06-096 C.M.R. ch. 130 [06-096 C.M.R. ch. 130]:
 1. Solvent cleaners using less than two liters (68 oz.) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
 2. Wipe cleaning; and,
 3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
- C. The following standards apply to cold cleaning machines that are applicable sources under 06-096 C.M.R. ch. 130.
 1. HPC shall attach a permanent conspicuous label to each unit summarizing the following operational standards:
 - a. Waste solvent shall be collected and stored in closed containers.
 - b. Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
 - c. Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
 - d. The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
 - e. Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the parts washer.
 - f. When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.

- g. Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
 - h. Work area fans shall not blow across the opening of the parts washer unit.
 - i. The solvent level shall not exceed the fill line.
2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches.
 3. Each parts washer shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent.
[06-096 C.M.R. ch. 130]

(20) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity on a five-minute block average basis.
[06-096 C.M.R. ch. 115, BPT]

(21) **Annual Emission Statement**

- A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, HPC shall annually report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory. The emission statement shall be submitted as specified by the date in 06-096 C.M.R. ch. 137.
- B. HPC shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:
 1. The amount of distillate fuel fired in the Package Boiler on a monthly basis;
 2. The sulfur content of the distillate fuel fired in the Package Boiler;
 3. The hours of operation for Boilers #1 and #2 each, on a monthly basis; and
 4. Calculations of the VOC and/or HAP emissions from the Parts Washers on a calendar year total basis.
- C. Beginning with reporting year 2020 and every third year thereafter, HPC shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). HPC shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3).
[38 M.R.S. § 353-A(1-A)]

Hardwood Products Company LLC
Piscataquis County
Guilford, Maine
A-328-71-L-R

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Departmental
Findings of Fact and Order
Air Emission License
Renewal

- (22) HPC 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. § 605).

DONE AND DATED IN AUGUSTA, MAINE THIS 7th DAY OF June, 2019.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: 
GERALD D. REID, COMMISSIONER

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

[Note: If a renewal application, determined as complete by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 M.R.S. § 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: June 7, 2017
Date of application acceptance: June 8, 2017

Date filed with the Board of Environmental Protection:

This Order prepared by Patric J. Sherman, Bureau of Air Quality.

