



DEPARTMENT ORDER

**JSI Store Fixtures Incorporated
Piscataquis County
Milo, Maine
A-1065-71-C-R (SM)**

**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

JSI Store Fixtures, Inc. (JSI) has applied to renew their Air Emission License for the operation of emission sources associated with their wood furniture manufacturing facility.

The equipment addressed in this license is located at 140 Park Street in Milo, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hour)	Fuel Type, % S	Installation Date	Stack #
Boiler #1	5.8	41.6	Distillate Fuel, 0.5% S	1966	B1

JSI also operates the following natural gas fired sources which are identified as insignificant activities as listed in 06-096 C.M.R. ch. 115 Appendix B(B)(2) and are listed for inventory purposes only:

Equipment	Location	Maximum Capacity (MMBtu/hr)
Buderus Water Heaters (2)	Warehouse Area	0.15
Furnace	Drying Room	0.495
Space Heaters	Loading Dock	<1.0
Office Heater	Administrative Office Area	0.18

Process Equipment

JSI operates two cyclones to collect and control particulate wood dust generated during the cutting and sanding process. These cyclones separate sawdust and grindings from the airstream.

In addition, JSI operates a total of six paint booths used during the staining, lacquering and laminating processes. The paint booths are equipped with fabric filters and exhaust externally.

Equipment	Substance Used	Production Rate (gal/year)	Control Equipment	Stack
Staining	Wood Stain	2,928	None	Ambient
Lacquer	Lacquer	17,001		
Laminating	Adhesive	16,494		

C. Definitions

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

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

D. Application Classification

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

The application for JSI 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.

With the annual Volatile Organic Compound (VOC) limits associated with the staining, lacquering and laminating processes, JSI is licensed below the major source thresholds for criteria pollutants and is considered a synthetic minor.

JSI is licensed below the major source thresholds for Hazardous Air Pollutants (HAP) and is considered an area source of 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 06-096 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

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

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

B. Process Description

JSI is a manufacturer of fixtures used by grocery retailers. Hardwood, plywood, pressboard/laminates, foam, and various plastic components are used in the production of custom store displays. The process involves the cutting, routing and sanding of components, the assembly of components, and finally the staining and lacquering of the assembled display.

The assembly and finishing of these displays involve the use of stains, lacquers, and adhesives that can emit VOCs and HAPs.

C. Boiler #1

JSI operates one boiler, designated Boiler #1, to provide heat and hot water to their facility.

Boiler #1 has a maximum design capacity of 5.8 MMBtu/hour, fires distillate fuel at a rate of 41.6 gallons/hour and was installed in 1966.

Boiler #1 exhausts through its own stack, designated Stack B1.

1. BPT Findings

The BPT emission limits for the boiler were based on the following:

PM/PM ₁₀	0.12 lb/MMBtu based on 06-096 C.M.R. ch. 103
SO ₂	0.5 lb/MMBtu, firing 0.5% S distillate fuel
NO _x	20 lb/1000 gallons, AP-42, Table 1.3-1, dated 5/10
CO	5.0 lb/1000 gallons, AP-42, Table 1.3-1, dated 5/10
VOC	0.34 lb/1000 gallons, AP-42, Table 1.3-3, dated 5/10
Opacity	06-096 C.M.R. ch. 115, BPT

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

Equipment	Pollutant	lb/MMBtu
Boiler #1	PM	0.12

Emissions from Boiler #1 shall not exceed the following:

Equipment	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.7	0.7	2.9	0.8	0.2	0.1

Visible emissions from Stack B1 shall not exceed 20% opacity on a six-minute block average basis.

JSI shall be limited to firing a total of 20,000 gallons of distillate fuel in Boiler #1, on a calendar-year total basis.

Fuel Sulfur Content Requirements

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

2. Periodic Monitoring

Periodic monitoring for Boiler #1 shall include recordkeeping to document fuel use both on a monthly and calendar-year total basis. Documentation shall include the type of fuel used and sulfur content of the fuel.

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

Due to its maximum design capacity and year of installation, Boiler #1 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

Since Boiler #1 is considered existing oil-fired boiler, Boiler #1 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. [40 C.F.R. §§63.11193 and 63.11195]

A summary of the currently applicable federal 40 C.F.R. Part 63, Subpart JJJJJ requirements is listed below. At this time, the Department has not taken delegation of this federal rule promulgated by EPA; however, JSI 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>.

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 for Boiler #1. [40 C.F.R. § 63.11223]

- (ii) Tune-ups shall be conducted on Boiler #1 on a two year interval.
[40 CFR Part 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. 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, not to exceed 36 months from the previous inspection. 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)]

JSI submitted their Notification of Compliance Status to EPA on March 31, 2014.

(3) Compliance Report

A compliance report shall be prepared by March 1st every two years 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 CFR § 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 40 CFR §§ 63.11214(d) to conduct a tune-up of each applicable boiler according to 40 CFR § 63.11223(b)."

D. Process Equipment

1. Cutting and Sanding Operations

JSI operates cutting and sanding equipment which emit particulate matter, which is controlled and collected through the operation of two cyclones.

Visible emission from each cyclone shall not exceed 20% opacity on a six-minute block average basis.

2. Wood Finishing / Spray Booths

JSI has six paint booths that are used during the assembly and finishing of their store displays. JSI uses stains, lacquers, and adhesives that can emit VOCs and HAPs. The paint booths are equipped with fabric filters and exhaust externally.

06-096 C.M.R. ch. 129 *Surface Coating Facilities* regulates the Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) from selected surface coating operations. The JSI facility meets the category definition of a '*Wood Furniture Manufacturing Operation*'. 06-096 C.M.R. ch. 129 (10)(a) references the standard to 40 CFR, Part 63, Subpart JJ. Since Subpart JJ is only applicable to major sources, there are no requirements in 06-096 C.M.R. ch. 129 for which JSI need comply.

JSI has previously evaluated Thermal Oxidizers, Catalytic Oxidizers and Adsorption techniques as possible add-on pollution control technology. Based on the cost of the installation, operation, and maintenance of such equipment, The Department had made the determination that the installation of such equipment is not economically viable for a facility of this size. Therefore, BPT for JSI shall consist of good operating practices to minimize VOC and HAP emissions, and the continual reevaluation of new coating additives to reduce VOC and HAP content, when practical.

JSI shall be limited to 49.0 tons per year of VOC from all stains, lacquers and adhesives, on a twelve-month rolling total basis.

JSI shall be limited to 9.9 tons per year of HAPs for any single HAP and 24.9 tons per year for all HAP emissions combined, with both limits on a twelve-month rolling basis.

Compliance with the VOC and HAP limits shall be demonstrated through records maintained on a monthly and twelve-month rolling total basis, showing the amount of each type of material used, percent VOC and HAP of the material (from the Safety Data Sheet), material weight and total VOC and HAP emitted through use of that material.

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

3. 06-096 C.M.R. ch. 159 - *Control of Volatile Organic Compounds from Adhesives and Sealants*

JSI is subject to *Control of Volatile Organic Compounds from Adhesives and Sealants*, 06-096 C.M.R. ch. 159, which is applicable to facilities that use or apply any adhesives, sealants, adhesive primers or sealer primers.

JSI shall comply with all applicable requirements of 06-096 C.M.R. ch 159.

E. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis.

F. Annual Emissions

1. Total Annual Emissions

JSI shall be restricted to the following annual emissions, on a twelve-month rolling-total basis.

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

Equipment	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	Single HAP	Total HAP
Boiler #1	0.2	0.2	0.7	0.2	0.1	0.1	0.0	0.0
Coating Operations	0.0	0.0	0.0	0.0	0.0	49.0	9.9	24.9
Total TPY	0.2	0.2	0.7	0.2	0.1	49.1	9.9	24.9

The tons per year limits were calculated based on Boiler #1 firing 20,000 gallons/year of distillate fuel and VOC/HAP limits placed on the amount of stains, lacquers, and adhesives that can be used in the manufacturing process.

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 C.M.R. 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).

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

- the types of fuel being fired;
- the facility’s fuel use limit;
- worst case emission factors from the following sources: U.S. EPA’s AP-42, the Intergovernmental Panel on Climate Change (IPCC), and 40 CFR Part 98, *Mandatory Greenhouse Gas Reporting*; and
- global warming potentials contained in 40 CFR Part 98.

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

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	25
PM ₁₀	25
SO ₂	50
NO _x	100
CO	250

The total licensed annual emissions for JSI are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

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-1065-71-C-R subject to the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License 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) Boiler #1

A. Fuel

1. Total fuel use for Boiler #1 shall not exceed 20,000 gallons/year of distillate fuel, on a calendar-year total basis. [06-096 C.M.R. ch. 115, BPT]
2. Prior to July 1, 2018, Boiler #1 shall fire distillate fuel with a maximum sulfur content not to exceed 0.5% by weight. [06-096 C.M.R. ch. 115, BPT]
3. Beginning July 1, 2018, JSI shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [06-096 C.M.R. ch. 115, BPT]
4. 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 calendar-year total basis. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following:

Equipment	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	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]:

Equipment	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.7	0.7	2.9	0.8	0.2	0.1

- D. Visible emissions from Stack B1 shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]
- E. Boiler MACT (40 C.F.R. Part 63, Subpart JJJJJ) Requirements for Boiler #1 [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. JSI shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]
 - a. Tune-ups shall be conducted on Boiler #1 on a two year interval. [40 C.F.R. Part 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. 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, not to exceed 36 months from the previous inspection. 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

For Boiler #1, a compliance report shall be prepared by March 1st every two years 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 40 C.F.R. § 63.11214(d) to conduct a tune-up of each applicable boiler according to 40 C.F.R. § 63.11223(b)."

(17) Wood Finishing

- A. For all stains, lacquers, and adhesives, JSI shall be limited to 49.0 tons of VOC year, on a twelve-month rolling-total basis. Compliance with the VOC limits shall be demonstrated through records showing the amount of each type of material used, percent VOC of the material (taken from the Safety Data Sheet), material weight and total VOC emitted through use of that material. Records shall be kept on a monthly and twelve-month rolling-total basis. [06-096 C.M.R. ch. 115, BPT]
- B. For all stains, lacquers, and adhesives, JSI shall be limited to 9.9 tons of HAPs for any single HAP and 24.9 tons for all HAP emissions combined, with both limits on a twelve-month rolling basis. Compliance with the HAP limits shall be demonstrated through records showing the amount of each type of material used, percent HAP of the material (taken from the Safety Data Sheet), material weight and total HAP emitted through use of that material. Records shall be kept on a monthly and twelve-month rolling-total basis. [06-096 C.M.R. ch. 115, BPT]
- C. Visible emissions from the wood finishing process shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]
- D. 06-096 C.M.R. ch. 159 - *Control of Volatile Organic Compounds from Adhesives and Sealants*

JSI shall comply with all applicable requirements 06-096 C.M.R. ch 159, specifically the following:

1. VOC Limits

- a. JSI shall not use any adhesive, sealant, adhesive primer, or sealant primer with VOC contents exceeding the concentrations provided in 06-096 C.M.R. ch. 115, Table 1. [06-096 C.M.R. ch. 159(2)(G)]
 - b. The VOC content limits in Table 1 for adhesives meeting the definition of “contact bond” shall apply to JSI’s laminating operations.
- 2. JSI shall store or dispose of all absorbent materials, such as cloth or paper, which are moistened with adhesives, sealants, primers or solvents subject to this rule, in non-absorbent containers that shall be closed except when placing materials in or removing materials from the container. [06-096 C.M.R. ch 159(F)]
 - 3. JSI shall not require the use or specify the application of any adhesive, sealant, adhesive primer, sealant primer, surface preparation or clean-up solvent if such use or application results in a violation of the provisions of this rule. The prohibition of this section shall apply to all written or oral contracts under which

any adhesive, sealant, adhesive primer, sealant primer, surface preparation or clean-up solvent subject to this rule. [06-096 C.M.R. ch 159(G)]

4. JSI shall maintain the following records:

- a. A list of each adhesive, sealant, adhesive primer, sealant primer cleanup solvent and surface preparation solvent in use and in storage;
- b. A data sheet or material list which provides the material name, manufacturer identification, and material application;
- c. Catalysts, reducers or other components used and the mix ratio;
- d. The VOC content of each product as supplied;
- e. The final VOC content or vapor pressure, as applied; and
- f. The annual volume of each adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent used or purchased. [06-096 C.M.R. ch. 159(4)]

6. All records made to determine compliance with 06-096 C.M.R. ch 159 shall be maintained for five years from the date such record is created and shall be made available to the Department within 90 days of a request. [06-096 C.M.R. ch. 159(4)(C)]

(18) Cutting and Sanding

- A. JSI shall operate and maintain cyclones for particulate control on cutting and sanding operations. [06-096 C.M.R. ch. 115, BPT]
- B. JSI shall conduct a monthly inspection of the cyclones and maintain a log detailing all routine and non-routine maintenance on each cyclone. The log shall contain location, date, nature of failure and action taken to correct the failure(s). [06-096 C.M.R. ch. 115, BPT]
- C. Visible emissions from each cyclone shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(19) Spray Booths

- A. Each spray booth shall vent through a fabric filter to control visible emissions. [06-096 C.M.R. ch. 115, BPT]

B. JSI shall conduct a monthly inspection of the spray booth and maintain a log recording all routine and non-routine maintenance of the spray booth. The log shall contain location, date, nature of failure and action taken to correct the failure(s). [06-096 C.M.R. ch. 115, BPT]

C. Visible emissions from each spray booth shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(20) General Process Sources

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(21) Annual Emission Statement

In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, JSI 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.

(22) JSI 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 4 DAY OF October, 2017.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Core for
PAUL MERCER, 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: December 15, 2016

Date of application acceptance: December 15, 2016

Date filed with the Board of Environmental Protection:

This Order prepared by Kevin J Ostrowski, Bureau of Air Quality.

