



DEPARTMENT ORDER

**Stratton Lumber, Inc.
Franklin County
Stratton, Maine
A-9-70-A-I**

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

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

| | |
|--------------------|-----------------------------------|
| FACILITY | Stratton Lumber, Inc. |
| LICENSE TYPE | Initial Part 70 License |
| NAICS CODES | 321113 |
| NATURE OF BUSINESS | Lumber mill |
| FACILITY LOCATION | 66 Fontaine Road, Stratton, Maine |

Stratton Lumber, Inc. (Stratton) is a lumber manufacturing facility consisting of a biomass fired boiler, a liquid propane gas (LPG) fired boiler, three lumber drying kilns, an emergency generator, and woodworking equipment.

Stratton has the potential to emit more than 50 tpy of volatile organic compounds (VOC); therefore, the source is classified as a major source for criteria pollutants.

Stratton does not have the potential to emit 10 tpy or more of a single hazardous air pollutant (HAP) or 25 tpy or more of combined HAP; therefore, the source is classified as an area source for HAP.

B. Emission Equipment

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

Boilers

| Equipment | Maximum Heat Input Capacity (MMBtu/hr) | Max. Firing Rate | Fuel Type, % sulfur | Manufacture Date | Install. Date | Stack # |
|-----------|--|------------------|---------------------|------------------|---------------|---------|
| Boiler #1 | 22.5 | 2.5* ton/hr | Biomass, neg | 1989 | 1990 | 1 |
| Boiler #2 | 8.42 | 92.0 gal/hr | LPG, neg | 2016 | 2016 | 6 |

* The maximum firing rate was based on a heat content of 4,500 BTU per pound of biomass at 50% moisture.

Generators

| Equipment | Maximum Heat Input Capacity (MMBtu/hr) | Max. Firing Rate (gal/hr) | Output (kW) | Fuel Type, % sulfur | Install. Date | Stack # |
|---------------------|--|---------------------------|-------------|--------------------------|---------------|---------|
| Emergency Generator | 0.19 | 1.4 | 20 | Distillate fuel, 0.0015% | 1996 | 7 |

Process Equipment

| Equipment | Production Rate | Pollution Control Equipment | Stack # |
|------------------------------------|---|-----------------------------|-------------|
| Kiln #1 | 150 MMBF/yr spruce and fir, 75 MMBF/yr fir ^a | None | Fugitive |
| Kiln #2 | | | |
| Kiln #3 | | | |
| Woodworking Equipment ^b | Varies | Cyclones | 2, 4, and 5 |

^a The production rate is for Kilns #1 through #3 combined.

^b Includes sawmill, planer, and fuel silo.

Stratton has additional insignificant activities which do not need to be listed in the emission equipment tables above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

C. Acronyms and Units of Measure

| | |
|-------------------|--|
| AGL | above ground level |
| ASTM | American Society for Testing and Materials |
| BACT | Best Available Control Technology |
| BF | board feet |
| BPT | Best Practical Treatment |
| Btu | British thermal unit |
| C.F.R. | Code of Federal Regulations |
| C.M.R. | Code of Maine Rules |
| CAM | Compliance Assurance Monitoring |
| CEMS | Continuous Emissions Monitoring System |
| CO | carbon monoxide |
| CO ₂ e | carbon dioxide equivalent |
| COMS | Continuous Opacity Monitoring System |
| EPA or US EPA | United States Environmental Protection Agency |
| gal/hr | gallon per hour |
| HAP | Hazardous Air Pollutants |
| hr/yr | hours per year |
| kW | kilowatt |
| lb | pound |
| lb/hr | pounds per hour |
| lb/MBF | pounds per thousand board feet |
| lb/MMBtu | pounds per million British thermal units |
| LPG | liquified petroleum gas |
| M.R.S. | Maine Revised Statutes |
| MBF | thousand board feet |
| MMBF | million board feet |
| MMBF/yr | million board feet per year |
| MMBtu | million British thermal units |
| MMBtu/hr | million British thermal units per hour |
| MMBtu/yr | million British thermal units per year |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NO _x | nitrogen oxides |
| NSPS | New Source Performance Standards |
| NSR | New Source Review |
| PM | particulate matter less than 100 microns in diameter |

| | |
|-------------------|--|
| PM ₁₀ | particulate matter less than 10 microns in diameter |
| PM _{2.5} | particulate matter less than 2.5 microns in diameter |
| ppm | parts per million |
| ppmv | parts per million by volume |
| RACT | Reasonably Available Control Technology |
| RICE | reciprocating internal combustion engine |
| SO ₂ | sulfur dioxide |
| ton/hr | tons per hour |
| tpy | tons per year |
| VOC | volatile organic compounds |

D. 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. Stratton 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.

Portable or Non-Road Engine means an internal combustion engine which is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform. This definition does NOT include engines which remain or will remain at a location (excluding storage locations) for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source. A location is any single site at a building, structure, facility, or installation. Any engine that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period.

An engine is not a non-road (portable) engine if it remains or will remain at a location for more than 12 consecutive months or for a shorter period of time if sited at a seasonal source. A seasonal source is a source that remains in a single location for two years or more and which operates for fewer than 12 months in a calendar year. If an engine operates at a seasonal source for one entire season, the engine does not meet the criteria of a non-road (portable) engine and is subject to applicable stationary engine requirements.

E. 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 Stratton is for an initial Part 70 License issued under *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 140.

F. General Facility Requirements

Stratton is subject to the following state and federal regulations listed below in addition to the regulations listed for specific units as described further in this license.

| Citation | Requirement Title |
|----------------------------------|---|
| 06-096 C.M.R. ch. 101 | Visible Emissions Regulation |
| 06-096 C.M.R. ch. 102 | Open Burning |
| 06-096 C.M.R. ch. 103 | Fuel Burning Equipment Particulate Emission Standard |
| 06-096 C.M.R. ch. 106 | Low Sulfur Fuel Regulation |
| 06-096 C.M.R. ch. 109 | Emergency Episode Regulations |
| 06-096 C.M.R. ch. 110 | Ambient Air Quality Standards |
| 06-096 C.M.R. ch. 116 | Prohibited Dispersion Techniques |
| 06-096 C.M.R. ch. 137 | Emission Statements |
| 06-096 C.M.R. ch. 140 | Part 70 Air Emission License Regulations |
| 06-096 C.M.R. ch. 143 | New Source Performance Standards |
| 06-096 C.M.R. ch. 144 | National Emission Standards for Hazardous Air Pollutants |
| 40 C.F.R. Part 60, Subpart Dc | Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units |
| 40 C.F.R. Part 63, Subpart ZZZZ | National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines |
| 40 C.F.R. Part 63, Subpart JJJJJ | National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources |
| 40 C.F.R. Part 70 | State Operating Permit Programs |

Note: C.M.R. = Code of Maine Regulations
 C.F.R. = Code of Federal Regulations

II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

A. Introduction

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

BPT for 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 emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. VOC RACT (Reasonably Available Control Technology)

Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds, 06-096 C.M.R. ch. 134 (VOC RACT) is applicable to sources that have the potential to emit quantities of VOC equal to or greater than 40 tons/year from non-exempt equipment. Boilers #1 and #2 are exempted in determining Stratton's total VOC emissions per 06-096 C.M.R. ch. 134 § 1(C)(4). Kilns #1, #2, and #3 are exempted per 06-096 C.M.R. ch. 134 § 1(C)(6). Therefore, 06-096 C.M.R. ch. 134 is not applicable to this facility.

C. Compliance Assurance Monitoring (CAM)

Compliance Assurance Monitoring, 40 C.F.R. Part 64 is applicable to units at major sources if the unit has emission limits, a control device to meet the limits, and pre-control emissions greater than 100% of the major source threshold (50 tons/year for VOC and 100 tpy for any other pollutant). Boiler #1 has emission limits for particulate matter (PM) which are met through the use of multiclones. However, the pre-control emissions of PM for Boiler #1 are less than 100 tons/year. No other units are equipped with control devices to meet emission limits. Therefore, 40 C.F.R. Part 64 is not applicable to this facility.

D. Fuel Sulfur Content Requirements

Stratton 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, the distillate fuel purchased or otherwise obtained for use at this facility shall not exceed 0.0015% by weight (15 ppm).

E. **Boiler #1**

Boiler #1 was manufactured by Industrial Boiler Co., Inc. in 1989 and installed in 1990. Boiler #1 was designed with a heat input capacity of 22.5 MMBtu/hr and combusts biomass. Boiler #1 is operated for drying kiln steam and facility heat and hot water. Boiler #1 was retrofitted in 2005 with an over-fire combustion air system that supplies combustion air into multiple locations along the length of the furnace combustion chamber, improving the combustion efficiency of the boiler. Boiler #1 is limited to a maximum annual heat input of 177,930 MMBtu/yr on a 12-month rolling total basis.

Emissions exit through Boiler Stack #1, which has an inside diameter of 2.0 feet and above ground level (AGL) height of 60 feet.

1. Control Equipment

Boiler #1 is equipped with two multi-cyclones operating in series for the removal of particulate matter, which incorporate a fly ash reinjection system.

2. New Source Performance Standards (NSPS)

Boiler #1 is subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Dc. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more that are constructed after June 9, 1989.

Stratton shall comply with all requirements of 40 C.F.R. Part 60, Subpart Dc applicable to Boiler #1 including, but not limited to, the following:

Reporting and Recordkeeping

Stratton shall maintain records of the amounts of each fuel combusted in Boiler #1 during each calendar month. [40 C.F.R. § 60.48c(g)]

3. National Emission Standards for Hazardous Air Pollutants (NESHAP)

Because Stratton is not a major HAP source, Boiler #1 is not subject to *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, 40 C.F.R. Part 63, Subpart DDDDD.

Boiler #1 is subject to *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 an existing biomass boiler.
[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. 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)] Stratton submitted their Initial Notification to EPA on August 22, 2011.

(2) Boiler Tune-Up Program

- (i) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]
- (ii) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. Tune-ups for Boiler #1 shall be conducted 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 and/or the Department. 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)] Stratton submitted their Notification of Compliance Status to EPA on June 11, 2014.

(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

Boiler #1 is 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, in accordance with 40 C.F.R. Part 63, Subpart JJJJJ, Table 2(16). [40 C.F.R. § 63.11196(a)(3)] Stratton submitted certification that the energy assessment was completed as part of the Notification of Compliance Status.
- (ii) 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)] Stratton submitted their Notification of Compliance Status to EPA on June 11, 2014.

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)]

4. Emission Limits and Streamlining

a. Criteria Pollutants

For Boiler #1, a listing of potentially applicable emission standards, the origin and authority of the standards, and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standards | Origin and Authority | Licensed Emission Limits |
|------------------|-------------------------------|-----------------------------------|--------------------------|
| PM | 0.30 lb/MMBtu | 06-096 C.M.R. ch. 103, § 2B(4)(a) | 0.30 lb/MMBtu |
| | 6.8 lb/hr | A-9-71-O-R (3/24/2014), BPT | 6.8 lb/hr |
| PM ₁₀ | 0.30 lb/MMBtu | A-9-71-O-R (3/24/2014), BPT | 0.30 lb/MMBtu |
| | 6.8 lb/hr | A-9-71-O-R (3/24/2014), BPT | 6.8 lb/hr |
| SO ₂ | 0.5 lb/hr | A-9-71-O-R (3/24/2014), BPT | 0.5 lb/hr |
| NO _x | 5.0 lb/hr | A-9-71-O-R (3/24/2014), BPT | 5.0 lb/hr |
| CO | 22.5 lb/hr | A-9-71-O-R (3/24/2014), BPT | 22.5 lb/hr |
| VOC | 2.3 lb/hr | A-9-71-O-R (3/24/2014), BPT | 2.3 lb/hr |

b. Visible Emissions

Visible emissions from Boiler #1 shall not exceed 30% opacity on a 6-minute block average basis, except for periods of startup, shutdown, malfunction, or approved maintenance, during which times Stratton may demonstrate compliance with the following work practice standards in lieu of the numerical visible emissions standard.

- (1) Maintain a log (written or electronic) of the date, time, and duration of all operating time, startups, shutdowns, and malfunctions for Boiler #1.
- (2) Develop and implement a written startup and shutdown plan for the Boiler #1.
- (3) For the purpose of these visible emissions standards, Startup shall be defined as the period beginning with initial firing of fuel in the boiler and ending when

any useful thermal energy (such as steam or hot water) from the boiler is supplied for any purpose. Startup of Boiler #1 shall not exceed 8 hours per occurrence.

- (4) The duration of unit shutdowns or malfunctions shall each not exceed one hour per occurrence.
- (5) Operate Boiler #1 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.

[06-096 C.M.R. ch. 101, § 3(A)(5)]

5. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boiler #1 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

6. Periodic Monitoring

Stratton shall record data and maintain records for the following periodic monitoring values for Boiler #1 and its associated air pollution control equipment as indicated in the following table whenever the equipment is operating.

| Boiler #1 | | | |
|--|-------------------------|---|--|
| Parameter | Units of Measure | Monitoring Tool/Method | Frequency |
| Biomass use | Tons | Measured volume with an industry-standard density to calculate weight | Monthly and 12-month rolling total |
| Operating time | Hours | Boiler control system (DCS) | Continuously monitored, recorded monthly |
| Maintenance activity on the boiler and multicyclones | Each | Maintenance log | Document as they occur |

7. Parameter Monitors

There are no Parameter Monitors required for Boiler #1.

8. CEMS and COMS

No continuous emission monitoring systems (CEMS) or continuous opacity monitoring systems (COMS) are required for Boiler #1.

F. Boiler #2

Boiler #2 was manufactured by Hurst in 2016 and installed in the same year. Boiler #2 was designed with a heat input capacity of 8.42 MMBtu/hr and combusts LPG. Boiler #2 is operated to supplement steam production for the drying kilns and building heat.

Emissions exit through Stack #6, which has an inside diameter of 16 inches and above ground level (AGL) height of 25 feet.

1. New Source Performance Standards (NSPS)

Due to its size, Boiler #2 is not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Dc. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more that are constructed after June 9, 1989.

2. National Emission Standards for Hazardous Air Pollutants (NESHAP)

Boiler #2 is exclusively fired by gas (LPG), as defined in 40 C.F.R. § 63.11237, and is located at an area source of HAP, as defined in § 63.2. Therefore Boiler #2 is not subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ.

Because Stratton is not a major HAP source, Boiler #2 is not subject to *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, 40 C.F.R. Part 63, Subpart DDDDD.

3. Emission Limits and Streamlining

a. Criteria Pollutants

For Boiler #2, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested (* denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standards | Origin and Authority | Licensed Emission Limits |
|------------------|-------------------------------|-----------------------------------|--------------------------|
| PM | 0.12 lb/MMBtu | 06-096 C.M.R. ch. 103, § 2B(1)(a) | 0.01 lb/MMBtu * |
| | 0.01 lb/MMBtu | A-9-71-P-A (9/23/2016), BPT | |
| PM | 0.08 lb/hr | A-9-71-P-A (9/23/2016), BACT | 0.08 lb/hr |
| PM ₁₀ | 0.01 lb/MMBtu | 06-096 C.M.R. ch. 140, BPT | 0.01 lb/MMBtu |
| | 0.08 lb/hr | A-9-71-P-A (9/23/2016), BPT | 0.08 lb/hr |
| SO ₂ | 0.01 lb/hr | A-9-71-P-A (9/23/2016), BPT | 0.01 lb/hr |
| NO _x | 0.67 lb/hr | A-9-71-P-A (9/23/2016), BPT | 0.67 lb/hr |
| CO | 2.53 lb/hr | A-9-71-P-A (9/23/2016), BPT | 2.53 lb/hr |
| VOC | 0.17 lb/hr | A-9-71-P-A (9/23/2016), BPT | 0.17 lb/hr |

b. Visible Emissions

Visible emissions from Boiler #2 shall not exceed 10% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 101, § 3(A)(3)]

4. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boiler #2 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

5. Periodic Monitoring

Stratton shall record data and maintain records for the following periodic monitoring values for Boiler #2. [06-096 C.M.R. ch. 137]

- a. Hours of operation for Boiler #2 on a monthly and calendar year basis.
- b. LPG usage for Boiler #2 on a monthly and calendar year basis.

6. Parameter Monitors

There are no Parameter Monitors required for Boiler #2.

7. CEMS and COMS

No continuous emission monitoring systems (CEMS) or continuous opacity monitoring systems (COMS) are required for Boiler #2.

G. Emergency Generator

Stratton operates one emergency generator. The Emergency Generator is a generator set consisting of an engine and an electrical generator. The Emergency Generator has an engine rated at 0.19 MMBtu/hr which fires distillate fuel. The Emergency Generator was manufactured before 1996.

1. New Source Performance Standards (NSPS)

Due to the date of manufacture of the Emergency Generator, the unit is not subject to the New Source Performance Standards (NSPS) *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE)*, 40 C.F.R. Part 60, Subpart IIII since the unit was manufactured prior to April 1, 2006. [40 C.F.R. § 60.4200]

2. National Emission Standards for Hazardous Air Pollutants (NESHAP)

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 C.F.R. Part 63, Subpart ZZZZ is applicable to the Emergency Generator. The unit is considered an existing, emergency stationary reciprocating internal combustion engine (RICE) at an area HAP source and is not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE*) specifically does not exempt these units from the federal requirements.

a. Emergency Engine Designation and Operating Criteria

Under Subpart ZZZZ, a stationary reciprocating internal combustion engine (RICE) is considered an **emergency** stationary RICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under Subpart ZZZZ, resulting in the engine being subject to requirements applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency

situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster or equipment failure;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

- (i) An emergency engine may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE more than 100 hours per calendar year.
- (ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

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

b. 40 C.F.R. Part 63, Subpart ZZZZ Requirements

(1) Operation and Maintenance Requirements
(40 C.F.R. § 63.6603(a) and Table 2(d))

| | Operating Limitations |
|---|---|
| Compression ignition (distillate fuel) units: Emergency Generator | <ul style="list-style-type: none">- Change oil and filter every 500 hours of operation or annually, whichever comes first;- Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. |

The engine shall be operated and maintained according to the manufacturer's emission-related written instructions, or Stratton shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

(2) Optional Oil Analysis Program

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

(3) Non-Resettable Hour Meter Requirement

A non-resettable hour meter shall be installed and operated on the Emergency Generator. [40 C.F.R. § 63.6625(f)]

(4) Startup Idle and Startup Time Minimization Requirements

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

(5) Annual Time Limit for Maintenance and Testing

As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by

providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). [40 C.F.R. § 63.6640(f)]

(6) Recordkeeping

Stratton shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 63.6655(f)]

3. Emission Limits and Streamlining

a. Criteria Pollutants

For the Emergency Generator, a listing of potentially applicable emission standards, the origin and authority of the standards, and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standards | Origin and Authority | Licensed Emission Limits |
|------------------|-------------------------------|----------------------------|--------------------------|
| PM | 0.06 lb/hr | 06-096 C.M.R. ch. 140, BPT | 0.06 lb/hr |
| PM ₁₀ | 0.06 lb/hr | 06-096 C.M.R. ch. 140, BPT | 0.06 lb/hr |
| NO _x | 0.84 lb/hr | 06-096 C.M.R. ch. 140, BPT | 0.84 lb/hr |
| CO | 0.19 lb/hr | 06-096 C.M.R. ch. 140, BPT | 0.19 lb/hr |
| VOC | 0.07 lb/hr | 06-096 C.M.R. ch. 140, BPT | 0.07 lb/hr |

b. Visible Emissions

Visible emissions from the Emergency Generator shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time Stratton may comply with the following work practice standards in lieu of the numerical visible emissions standard. [06-096 C.M.R. ch. 101, § 3(A)(4)(a)]

- (1) Maintain a log (written or electronic) of the date, time, and duration of all generator startups.
- (2) Operate the Emergency Generator in accordance with the manufacturer's emission-related operating instructions.
- (3) Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations shall apply.

(4) Operate the Emergency Generator, including any associated air pollution control equipment, 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.

4. Emission Limit Compliance Methods

Compliance with the emission limits associated with the Emergency Generator shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

5. Periodic Monitoring

Stratton shall record data and maintain records for the following periodic monitoring values for the Emergency Generator as indicated in the following table whenever the equipment is operating.

| Parameter | Units of Measure | Monitoring Tool/Method | Frequency |
|--|--------------------|---------------------------------------|---------------------------------|
| Fuel oil sulfur content | Percent, by weight | Fuel receipts from supplier | As fuel is purchased |
| Operating time | Hours | Hour Meter | Monthly and calendar year total |
| Type of Operation (emergency, maintenance, etc.) | N/A | Recorded electronically or in logbook | As occurs |

6. Parameter Monitors

There are no Parameter Monitors required for the Emergency Generator.

7. CEMS and COMS

There are no CEMS or COMS required for the Emergency Generator.

H. Kilns

Stratton operates three kilns, designated Kiln #1, Kiln #2, and Kiln #3, to dry lumber. Heat for the kilns is provided by Boilers #1 and #2. Kilns #1 and #2 are batch kilns with approximate capacities of 240,000 board feet (BF) per charge, and 180,000 BF/charge,

respectively. In 2017, Stratton converted Kiln #3 from a batch to continuous feed kiln, where lumber is continuously fed into and out of the kiln.

Stratton's Air Emission License Amendment A-9-71-Q-A (June 28, 2017) established a facility wide kiln throughput limit of 150 million board feet (MMBF) per year, with up to 75 MMBF/yr available for drying fir species. Using a VOC emission factor for fir of 1.14 pounds per thousand board feet (lb/MBF) and a VOC emission factor for spruce of 0.77 lb/MBF, Stratton has a potential to emit 71.6 tons of VOC per year from kiln operations based on a twelve-month rolling total. Emission factors were obtained from two University of Maine studies published in June 1997 and April 2000 for Champion International, respectively.

Periodic Monitoring

Periodic monitoring for all Stratton kilns shall consist of records of kiln throughputs and the VOC emission factor used for each specific species of wood dried. Records shall be maintained on a monthly and twelve-month rolling total basis.

I. Woodworking Equipment and Cyclones

Stratton operates a variety of woodworking equipment to produce dimensional lumber. Major pieces of equipment include a sawmill and a planer mill. Residual wood waste from the woodworking operations are pneumatically conveyed throughout the facility to three primary cyclones which are used to separate wood residuals from the air stream. The Fuel Silo Cyclone is located at the top of Boiler #1's wood fuel silo, the Planer/Edgings Chip Cyclone is located on the roof of the sawmill building, and the Planer Shavings Cyclone is located on top of the materials building.

Stratton shall maintain a log of the conditions of the cyclones and wood residual conveying systems. Stratton shall inspect operations of the cyclones and the wood residual conveying systems once per month and record the findings and any repairs conducted on the units.

Visible emissions from each cyclone shall not exceed an opacity of 20% on a 6-minute block average basis. [06-096 C.M.R. ch. 101, § (3)(B)(4)]

J. Portable Engines

Stratton may operate portable engines on-site for maintenance and emergency-only purposes. Depending on their size and age, these engines may be subject to *Visible Emissions Regulation*, 06-096 C.M.R. ch. 101 and *Fuel Burning Equipment Particulate Emission Standard*, 06-096 C.M.R. ch. 103.

Any engine which cannot meet the definition of “portable engine” as defined by this license may be subject to additional State and Federal regulations. A license amendment may be necessary for a portable engine to be reclassified as stationary.

K. Emission Statements

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

1. The amount of wood fired (at 50% moisture) in Boiler #1 on a monthly basis;
2. The amount of LPG fired in Boiler #2 on a monthly basis;
3. The sulfur content of the distillate fuel fired in the Emergency Generator;
4. Kiln throughput and species dried, on a monthly basis;
5. Calculations of the VOC emissions from the kilns on a monthly basis; and
6. Hours each emission unit was active or operating on a monthly basis.

In reporting year 2020 and every third year thereafter, Stratton 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. Stratton 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)]

L. Facility Annual Emissions

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

- An annual heat input of 177,390 MMBtu/yr for Boiler #1;
- Operating Boiler #2 for 8,760 hr/yr;
- A total maximum throughput of 150 MMBF/yr for the kilns, with 75 MMBF/yr of fir species; and
- Operating the Emergency Generator for 100 hr/yr.

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

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

| | PM | PM ₁₀ | SO ₂ | NO _x | CO | VOC |
|---------------------|-------------|------------------|-----------------|-----------------|-------------|-------------|
| Boiler #1 | 26.6 | 26.6 | 1.8 | 19.5 | 88.7 | 8.9 |
| Boiler #2 | 0.4 | 0.4 | 0.1 | 3.0 | 11.1 | 0.7 |
| Kilns | - | - | - | - | - | 71.6 |
| Emergency Generator | - | - | - | - | - | - |
| Total TPY | 27.0 | 27.0 | 1.9 | 22.5 | 99.8 | 81.2 |

| Pollutant | Tons/year |
|------------|-----------|
| Single HAP | 9.9 |
| Total HAP | 24.9 |

III. AMBIENT AIR QUALITY ANALYSIS

Stratton previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (see license A-9-71-G-A/R, issued on September 8, 1997). An additional ambient air quality analysis is not required for this Part 70 License.

ORDER

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

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

The Department hereby grants the Part 70 License A-9-70-A-I pursuant to 06-096 C.M.R. ch. 140 and the preconstruction permitting requirements of 06-096 C.M.R. ch. 115 and subject to the standard and specific conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Stratton pursuant to the Department's preconstruction permitting requirements have been incorporated into this Part 70 license, except for such conditions that the Department has determined are obsolete, extraneous, or otherwise environmentally insignificant, as explained in the Findings of Fact accompanying this Order. As such, the conditions in this license supersede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 for making such changes and pursuant to the applicable requirements in 06-096 C.M.R. ch. 140.

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

Severability. The invalidity or unenforceability of any provision of this License 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 STATEMENTS

- (1) 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. 140]
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 C.M.R. ch. 140]
- (4) 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. 140]
- (5) Notwithstanding any other provision 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. 140]
- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

- A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
- B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or affect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated October 10, 2018.

Permit Shield Table

| Source | Citation | Description | Basis for Determination |
|---------------------|----------------------------------|---|---|
| Facility | 06-096 C.M.R. ch. 134 | VOC RACT | Non-exempt equipment emits less than 40 tpy of VOC |
| Facility | 06-096 C.M.R. ch. 138 | NO _x RACT | Facility emits less than 100 tpy of NO _x |
| All Boilers | 40 C.F.R. Part 60, Subpart D | NSPS for Fossil-Fuel-Fired Steam Generators | Maximum heat input for each boiler less than 250 MMBtu/hr |
| All Boilers | 40 C.F.R. Part 60, Subpart Db | NSPS for Industrial-Commercial-Institutional Steam Generating Units | Maximum heat input for each boiler less than 100 MMBtu/hr |
| Boiler #2 | 40 C.F.R. Part 60, Subpart Dc | NSPS for Small Industrial-Commercial-Institutional Steam Generating Units | Maximum heat input less than 10 MMBtu/hr |
| Emergency Generator | 40 C.F.R. Part 60, Subpart III | NSPS for Compression Ignition Internal Combustion Engines | Manufactured prior to April 1, 2006 |
| Boiler #2 | 40 C.F.R. Part 63, Subpart JJJJJ | NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources | Boiler #2 is gas fired |

| Source | Citation | Description | Basis for Determination |
|-------------|----------------------------------|--|---|
| All Boilers | 40 C.F.R. Part 63, Subpart DDDDD | NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters | Facility is not a major source of HAP |
| Facility | 40 C.F.R. Part 64 | Compliance Assurance Monitoring | Pre-control emissions below major source thresholds |
| Facility | 40 C.F.R. Part 98 | Mandatory Greenhouse Gas Reporting | Facility does not contain any source category listed in Tables A-3 or A-4 of the rule, and facility does not have the potential to emit more than 25,000 metric tons of CO ₂ e |

[06-096 C.M.R. ch. 140]

- (7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of three or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to 06-096 C.M.R. ch. 140;
 - B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
 - C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
 - D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[06-096 C.M.R. ch. 140]

- (8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading, and other similar programs or processes for changes that are provided for in the Part 70 license. [06-096 C.M.R. ch. 140]

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 and this license (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 06-096 C.M.R. ch. 140. [06-096 C.M.R. ch. 140]
- (3) 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. 140]
Enforceable by State-only
- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to 38 M.R.S. § 353-A.
- (5) The licensee shall maintain and operate all emission units and air pollution control 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. 140]
Enforceable by State-only
- (6) 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. In addition, the licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license. [06-096 C.M.R. ch. 140]
- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, 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 the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [06-096 C.M.R. ch. 140]

- (8) 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 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;
 - 2. To demonstrate compliance with the applicable emission standards; or
 - 3. 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. 140] **Enforceable by State-only**

- (9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates 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. 140] **Enforceable by State-only**

- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.
- A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;
- B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 M.R.S. § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design, or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

- C. All other deviations shall be reported to the Department in the facility's semiannual report.

[06-096 C.M.R. ch. 140]

- (11) Upon the written request of 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 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. 140]

- (12) The licensee shall submit semiannual reports of any required periodic monitoring by January 31 and July 31 of each year, or on an equivalent schedule specified in the license. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [06-096 C.M.R. ch. 140]
- (13) The licensee shall submit a compliance certification to the Department and EPA annually by January 31 of each year, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
- A. The identification of each term or condition of the Part 70 license that is the basis of the certification;
 - B. The compliance status;
 - C. Whether compliance was continuous or intermittent;
 - D. The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - E. Such other facts as the Department may require to determine the compliance status of the source.

[06-096 C.M.R. ch. 140]

SPECIFIC CONDITIONS

(14) **Boiler #1 – 22.5 MMBtu/hr**

A. Allowable Fuels

1. Boiler #1 is licensed to fire biomass. [A-9-71-O-R (3/24/2014), BPT]
2. Total annual heat input into Boiler #1 shall be limited to 177,930 MMBtu/yr, on a 12-month rolling basis. [A-9-71-P-A (9/23/2016), BPT]
3. Stratton shall maintain records of the quantity of fuel consumed on a monthly and 12-month rolling total basis. [A-9-71-O-R (3/24/2014), BPT; and 40 C.F.R. § 60.48c(g)(2)]

B. Control Equipment

Stratton shall control particulate matter emissions from Boiler #1 by use of two multiple centrifugal cyclones (multiclones) in series and shall maintain records of all maintenance performed on each multiclone, as well as records documenting the nature of all failures and corrective actions taken. [A-9-71-O-R (3/24/2014), BPT]

C. Boiler #1 Emission Limits

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

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

| Pollutant | lb/MMBtu | Origin and Authority | Enforceability |
|------------------|----------|--------------------------------------|--------------------------|
| PM | 0.30 | 06-096 C.M.R. ch. 103, § 2B(4)(a) | Federally Enforceable |
| PM ₁₀ | 0.30 | A-9-71-O-R (3/24/2014), BPT | Federally Enforceable |

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

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|------------------|-------|-----------------------------|--------------------------|
| PM | 6.8 | A-9-71-O-R (3/24/2014), BPT | Federally Enforceable |
| PM ₁₀ | 6.8 | A-9-71-O-R (3/24/2014), BPT | Federally Enforceable |
| SO ₂ | 0.5 | A-9-71-O-R (3/24/2014), BPT | Federally Enforceable |
| NO _x | 5.0 | A-9-71-O-R (3/24/2014), BPT | Federally Enforceable |
| CO | 22.5 | A-9-71-O-R (3/24/2014), BPT | Federally Enforceable |
| VOC | 2.3 | A-9-71-O-R (3/24/2014), BPT | Federally Enforceable |

D. Visible Emissions

1. Visible emissions from Boiler #1 shall not exceed 30% opacity on a 6-minute block average basis except for periods of startup, shutdown, or malfunction during which times Stratton may demonstrate compliance through the following work practice standards in lieu of the numerical visible emissions standard.
[06-096 C.M.R. ch. 101, § 3(A)(5)]
 - a. Maintain a log (written or electronic) of the date, time, and duration of all operating time, startups, shutdowns, and malfunctions for Boiler #1.
 - b. Develop and implement a written startup and shutdown plan for the Boiler #1.
 - c. Limit the duration of unit startups to not exceed 8 hours per occurrence.
 - d. Limit the duration of unit shutdowns to not exceed one hour per occurrence.

- e. Operate Boiler #1 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. Upon request by the Department, Stratton shall demonstrate compliance with the visible emission limits for Boiler #1 through performance testing in accordance with 40 C.F.R. Part 60, Appendix A, Method 9. [40 C.F.R. § 70.6(c)(1)]

E. Compliance Methods

Upon request by the Department, Stratton shall conduct performance testing to demonstrate compliance with the above emission limits for Boiler #1.
[40 C.F.R. § 70.6(c)(1)]

F. Periodic Monitoring

Stratton shall record data and maintain records for the following periodic monitoring values for Boiler #1 and its associated air pollution control equipment whenever the equipment is operating.

1. Hours of operation for Boiler #1 on a monthly and 12-month rolling total basis.
[06-096 C.M.R ch. 137]
2. Biomass usage for Boiler #1 on a monthly and 12-month rolling total basis.
[06-096-C.M.R. ch. 137]
3. Records of any maintenance activities performed (planned or unplanned) on Boiler #1 and the associated multiclones. [40 C.F.R. § 70.6(c)(1)]

G. 40 C.F.R. Part 60, Subpart Dc

Stratton shall comply with all requirements of 40 C.F.R. Part 60, Subpart Dc applicable to Boiler #1 including, but not limited to, the following:

Stratton shall maintain records of the amounts of biomass combusted in Boiler #1 during each calendar month. [40 C.F.R. § 60.48c(g)(2)]

H. 40 C.F.R. Part 63, Subpart JJJJJ

Stratton shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJ applicable to Boiler #1 including, but not limited to, the following:

1. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]
 - a. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. Tune-ups for Boiler #1 shall be conducted 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 and/or the Department. 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 initial tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

(15) **Boiler #2 – 8.42 MMBtu/hr**

A. Allowable Fuels

1. Boiler #2 is licensed to fire LPG. [06-096 C.M.R. ch. 140, BPT]
2. Stratton shall maintain records of the quantity of fuel consumed on a monthly and calendar year basis. [06-096 C.M.R. ch. 140, BPT]

B. Boiler #2 Emission Limits

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

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

| Pollutant | lb/MMBtu | Origin and Authority | Enforceability |
|------------------|----------|-----------------------------|----------------------------------|
| PM | 0.01 | A-9-71-P-A (9/23/2016), BPT | Federally Enforceable |
| PM ₁₀ | 0.01 | 06-096 C.M.R. ch. 140, BPT | Enforceable by State-only |

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

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|------------------|-------|-----------------------------|------------------------------|
| PM | 0.08 | A-9-71-P-A (9/23/2016), BPT | Federally Enforceable |
| PM ₁₀ | 0.08 | A-9-71-P-A (9/23/2016), BPT | Federally Enforceable |
| SO ₂ | 0.01 | A-9-71-P-A (9/23/2016), BPT | Federally Enforceable |
| NO _x | 0.67 | A-9-71-P-A (9/23/2016), BPT | Federally Enforceable |
| CO | 2.53 | A-9-71-P-A (9/23/2016), BPT | Federally Enforceable |
| VOC | 0.17 | A-9-71-P-A (9/23/2016), BPT | Federally Enforceable |

C. Visible Emissions

1. Visible emissions from Boiler #2 shall not exceed 10% opacity on a 6-minute block average basis [06-096 C.M.R. ch. 101, § 3(A)(3)]
2. Upon request by the Department, Stratton shall demonstrate compliance with the visible emission limit for Stack #2 through performance testing in accordance with 40 C.F.R. Part 60, Appendix A, Method 9. [40 C.F.R. § 70.6(c)(1)]

D. Compliance Methods

Upon request by the Department, Stratton shall conduct performance testing to demonstrate compliance with the above emission limits for Boiler #2.
[40 C.F.R. § 70.6(c)(1)]

E. Periodic Monitoring

Stratton shall record data and maintain records for the following periodic monitoring values for Boiler #2 whenever the equipment is operating. [06-096 C.M.R. ch. 137]

1. Hours of operation for Boiler #2 on a monthly and calendar year basis.
2. LPG usage for Boiler #2 on a monthly and calendar year basis.

(16) **Emergency Generator**

A. Allowable Operation and Fuels

The Emergency Generator is licensed to fire distillate fuel.
[06-096 C.M.R. ch. 140, BPT]

B. Fuel Sulfur Content

1. The fuel oil sulfur content for the Emergency Generator shall be limited to 0.0015% sulfur by weight. [06-096 C.M.R. ch. 140, BPT]
2. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier, fuel supplier certification, certificate of analysis, or testing of the tank containing the fuel to be fired. [06-096 C.M.R. ch. 140, BPT]

C. Emissions shall not exceed the following limits [06-096 C.M.R. ch. 140, BPT]
Enforceable by State-only:

| Unit | PM (lb/hr) | PM ₁₀ (lb/hr) | NO _x (lb/hr) | CO (lb/hr) | VOC (lb/hr) |
|---------------------|---------------|-----------------------------|----------------------------|---------------|----------------|
| Emergency Generator | 0.06 | 0.06 | 0.84 | 0.19 | 0.07 |

D. Visible Emissions

Visible emissions from the Emergency Generator shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time Stratton may comply with the following work practice standards in lieu of the numerical visible emissions standard. [06-096 C.M.R. ch. 101, § 3(A)(4)]

1. Maintain a log (written or electronic) of the date, time, and duration of all generator startups.
 2. Operate the Emergency Generator in accordance with the manufacturer's emission-related operating instructions.
 3. Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations shall apply.
 4. Operate the Emergency Generator, including any associated air pollution control equipment, 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. The Emergency Generator shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following:
1. Stratton shall meet the following operational limitations for the compression ignition emergency engine (the Emergency Generator):
 - a. Change the oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c. Inspect the hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Records shall be maintained documenting compliance with the operational limitations.

[40 C.F.R. § 63.6603(a) and Table 2(d); and 06-096 C.M.R. ch. 140, BPT]

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

3. Non-Resettable Hour Meter

A non-resettable hour meter shall be installed and operated on the engine.
[40 C.F.R. § 63.6625(f)]

4. Maintenance, Testing, and Non-Emergency Operating Situations

a. The Emergency Generator shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written logs) of all engine operating hours. [40 C.F.R. § 63.6640(f) and 06-096 C.M.R. ch. 140, BPT]

b. Stratton shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the/ unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. §§ 63.6655(e) and (f)]

5. Operation and Maintenance

The Emergency Generator shall be operated and maintained according to the manufacturer's emission-related written instructions, or Stratton shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

6. Startup Idle and Startup Time Minimization

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

(17) **Kilns**

A. Stratton shall be limited to drying a total of 150.0 MMBF/yr of spruce and fir combined, on a 12-month rolling total basis. [A-9-71-Q-A (6/28/2017), BPT]

B. Stratton shall be limited to drying no more than 75.0 MMBF/yr of fir, on a 12-month rolling total basis. [A-9-71-Q-A (6/28/2017), BPT]

- C. Stratton shall maintain records of wood drying. Records shall include quantity of wood dried, indicating the specific species of wood dried, Records shall be maintained on a monthly and 12-month rolling total basis. [A-9-71-Q-A (6/28/2017), BPT]
- D. Prior to drying any other species of wood in the kilns, Stratton shall contact the Department to assess whether any modifications need to be made to this Air Emission License. [A-9-71-Q-A (6/28/2017), BPT]

(18) **Woodworking Equipment and Cyclones**

- A. Stratton shall operate and maintain the cyclones in a manner that minimizes emissions from the cyclones. [A-9-71-O-R (3/24/2014), BPT]
- B. Visible emissions from each cyclone shall not exceed 20% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 101, § (3)(B)(4)]
- C. Stratton shall inspect the cyclones and wood residual conveying systems once per month and record the findings and any maintenance performed. [A-9-71-O-R (3/24/2014), BPT]

(19) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity on a 5-minute block average basis. [06-096 C.M.R. ch. 101, § 3(C)]

(20) **General Process Sources**

Visible emissions from any general process source shall not exceed 20% on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 3(B)(4)]

(21) **Semiannual Reporting** [06-096 C.M.R. ch. 140]

- A. The licensee shall submit to the Bureau of Air Quality semiannual reports which are due on **January 31st** and **July 31st** of each year. The facility's designated responsible official must sign this report.
- B. The semiannual report shall be considered on-time if the postmark of the submittal is on or before the due date or if the report is received by the Department within seven calendar days of the due date.
- C. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- D. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

(22) **Annual Compliance Certification**

Stratton shall submit an annual compliance certification to the Department and EPA in accordance with Standard Condition (13) of this license. The annual compliance certification is due **January 31st** of each year. The facility's designated responsible official must sign this report.

The annual compliance certification shall be considered on-time if the postmark of the submittal is on or before the due date or if the report is received by the Department within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [06-096 C.M.R. ch. 140]

(23) **Annual Emission Statements**

A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, Stratton 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. Stratton shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:

1. The amount of wood fired (at 50% moisture) in Boiler #1 on a monthly basis;
2. The amount of LPG fired in Boiler #2 on a monthly basis;
3. The sulfur content of the distillate fuel fired in the Emergency Generator;
4. Kiln throughput on a monthly basis;
5. Calculations of the VOC emissions from the kilns on a monthly basis; and
6. Hours each emission unit was active or operating on a monthly basis.

[06-096 C.M.R. ch. 137]

C. In reporting year 2020 and every third year thereafter, Stratton shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). Stratton 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)]

(24) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

| Origin and Authority | Requirement Summary | Enforceability |
|------------------------|----------------------------------|---------------------------|
| 06-096 C.M.R. ch. 102 | Open Burning | - |
| 06-096 C.M.R. ch. 109 | Emergency Episode Regulations | - |
| 06-096 C.M.R. ch. 110 | Ambient Air Quality Standards | - |
| 06-096 C.M.R. ch. 116 | Prohibited Dispersion Techniques | - |
| 38 M.R.S. § 585-B, §§5 | Mercury Emission Limit | Enforceable by State-only |

(25) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. Examples of such units include refrigerators and any size air conditioners that contain CFCs. [40 C.F.R. Part 82, Subpart F]

(26) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Stratton shall comply with the *Standard for Asbestos Demolition and Renovation*, 40 C.F.R. Part 61, Subpart M.

(27) **Expiration of a Part 70 license**

- A. Stratton shall submit a complete Part 70 renewal application at least six but no more than 18 months prior to the expiration of this air license.
- B. Pursuant to Title 5 M.R.S. §10002, and 06-096 C.M.R. ch. 140, the Part 70 license shall not expire and all terms and conditions shall remain in effect until the Department takes final action on the renewal application of the Part 70 license. An existing source submitting a complete renewal application under 06-096 C.M.R. ch. 140 prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license. **Enforceable by State-only**

(28) **New Source Review**

Stratton is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emission license, and the NSR requirements remain in effect even if this 06-096 C.M.R. ch. 140 Air Emission License, A-9-70-A-I, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 30th DAY OF JUNE, 2021.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

[Note: If a complete renewal application, as determined by the Department, is submitted at least six but no more than 18 months prior to expiration of the facility's Part 70 license, then pursuant to Title 5 M.R.S. §10002, all terms and conditions of the Part 70 license shall remain in effect until the Department takes final action on the Part 70 license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 16, 2018

Date of application acceptance: October 17, 2018

Date filed with the Board of Environmental Protection:

This Order prepared by Benjamin Goundie, Bureau of Air Quality.

FILED
JUN 30, 2021
State of Maine
Board of Environmental Protection