



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE  
GOVERNOR

PATRICIA W. AHO  
COMMISSIONER

**Robbins Lumber, Inc.  
Waldo County  
Searsmont, Maine  
A-156-70-D-R**

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

**FINDINGS OF FACT**

After review of the Part 70 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 Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

FACILITY	Robbins Lumber, Inc. (Robbins Lumber)
LICENSE TYPE	Part 70 License Renewal
NAICS CODES	321912, 321113, 321999
NATURE OF BUSINESS	Lumber Manufacturing
FACILITY LOCATION	Ghent Road, Searsmont, Maine

Robbins Lumber produces lumber from logs. The processes involved include debarking, sawing, edging, drying, and planing.

Robbins Lumber has the potential to emit more than 100 tons per year (TPY) of carbon monoxide (CO) and more than 50 TPY of volatile organic compounds (VOC). Therefore, the source is a major source for criteria pollutants. Robbins Lumber 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 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 (ton/hr)	Fuel Type, % sulfur	Manufacture Date	Stack #
Boiler #1	21.3	2.4	wood, negligible	1976	1
Boiler #2	49.33	5.5	wood, negligible waste oil, 0.7%	1986	2

**Generators**

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Max. Firing Rate (gal/hr)	Fuel Type, % sulfur	Manf. Date	Install. Date
Generator #1	18.7	136.5	distillate fuel, 0.0015%	1986	2001

**Process Equipment**

Equipment	Capacity	Pollution Control Equipment
Drying Kilns	40 MMBF/year	none
Biocide Dip Tank	4200 gallons	none
Parts Washer	15 gallons	none
Pneumatic Conveying Systems	N/A	Cyclones

Robbins Lumber 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 CMR 140 (as amended).

**C. Definitions**

*Distillate Fuel* means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials 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**

The application for Robbins Lumber is for the renewal of their existing Part 70 Air License and subsequent Part 70 amendments. Pursuant to Section 2(A) of 06-096 Code of Maine Rules (CMR) 140, Robbins Lumber has also requested incorporation into the Part 70 Air License the relevant terms and conditions of the 06-096 CMR 115 New Source Review (NSR) licenses issued to Robbins Lumber, including A-156-77-1-M issued 1/6/14. Therefore, the license is considered to be a Part 70 License renewal with the incorporation of NSR requirements.

#### **E. Facility Description**

Robbins Lumber produces lumber from white pine. Logs are brought on-site, weighed, and catalogued via a computer system. The logs then go through a ring debarker, with a separate ring debarker used for the larger diameter logs. The logs are scanned for iron then go to one of two tracks (each track is the same).

The log goes through an automated, computer controlled band saw. The boards from the band saw then go through an optimizing edger, a sorter, and on to air dry storage. Following this initial storage, the boards are sent through the drying kilns and then to dry storage. From dry storage, the boards go to the computerized planer mill. During this process, board ends are imprinted with codes for identification and inventory. A dipping area is sometimes used to prevent 'stain' on the boards. In the final stage, the boards are stacked and shipped to customers.

The wood waste from the process is either burned on-site or sold. The sawmill waste is conveyed and sized. The sawdust is either sold or used as boiler fuel. Slabs are chipped and the chips are sold. An enclosed hammer mill for bark processing is located at the site and the bark is sold as land mulch. The wood waste from the planing operation is shredded for boiler fuel and the shavings are sold.

The fuel mixture for the boilers includes whole tree chips, sawmill waste, and planer mill waste. The fuel storage area is covered with a roof and three sides.

#### **F. General Facility Requirements**

Robbins Lumber 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 CMR 101	Visible Emissions Regulation
06-096 CMR 102	Open Burning
06-096 CMR 103	Fuel Burning Equipment Particulate Emission Standard
06-096 CMR 105	General Process Source Particulate Emission Standard
06-096 CMR 106	Low Sulfur Fuel Regulation
06-096 CMR 109	Emergency Episode Regulations
06-096 CMR 110	Ambient Air Quality Standards
06-096 CMR 115	Major and Minor Source Air Emission License Regulations
06-096 CMR 116	Prohibited Dispersion Techniques
06-096 CMR 130	Solvent Cleaners
06-096 CMR 137	Emission Statements
06-096 CMR 140	Part 70 Air Emission License Regulations
06-096 CMR 143	New Source Performance Standards
06-096 CMR 144	National Emission Standards for Hazardous Air Pollutants
40 CFR Part 63, Subpart ZZZZ	National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR Part 63, Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
40 CFR Part 70	State Operating Permit Programs

Note: CMR = Code of Maine Regulations  
CFR = Code of Federal Regulations

**G. Units of Measurement**

The following units of measurement are used in this license:

BF	board feet
gal/hr	gallons per hour
lb/hr	pounds per hour
lb/MMBtu	pounds per million British Thermal Units
lb/ton	pounds per ton
MMBF	million board feet
MMBF/year	million board feet per year
MMBtu/hr	million British Thermal Units per hour
ton/hr	ton per hour
ton/year or tpy	tons per year

## 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 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing 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. NO<sub>x</sub> RACT (Reasonably Available Control Technology)

*Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides*, 06-096 CMR 138 (as amended) is applicable to sources that have the potential to emit quantities of NO<sub>x</sub> equal to or greater than 100 tons/year. Robbins Lumber has federally enforceable fuel use limits that restrict the facility to emissions of less than 100 ton/year of NO<sub>x</sub>. Therefore, 06-096 CMR 138 is not applicable to this facility.

### C. VOC RACT (Reasonably Available Control Technology)

*Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds*, 06-096 CMR 134 (as amended) is applicable to sources that have the potential to emit quantities of VOC equal to or greater than 40 tons/year, except for exempt equipment or processes. Robbins Lumber has VOC emission limits greater than 40 ton/year. However, indirect contact wood kilns are exempt when determining the facility's total VOC emission for the purposes of 06-096 CMR 134. After excluding the kiln emissions, Robbins Lumber is below the 40 ton/year threshold. Therefore, 06-096 CMR 134 is not applicable to this facility.

### D. Mandatory Greenhouse Gas (GHG) Reporting

Federal regulation 40 CFR Part 98, *Mandatory Greenhouse Gas Reporting*, which contains GHG reporting and related monitoring and recordkeeping requirements, is applicable to the owners/operators of any facility which falls into any one of the

following three categories, per 40 CFR Part 98, Subpart A, *General Provision*, § 98.2, *Who must report?*

- (a)(1) A facility that contains any source category that is listed in Table A-3 of this subpart in any calendar year starting in 2010.
- (a)(2) A facility that contains any source category that is listed in Table A-4 of this subpart and that emits 25,000 metric tons CO<sub>2</sub>e or more per year in combined emissions from stationary fuel combustion units, miscellaneous uses of carbonate, and all applicable source categories that are listed in Table A-3 and Table A-4 of this subpart.
- (a)(3) A facility that in any calendar year starting in 2010 meets all three of the conditions listed in this paragraph (a)(3). For these facilities, the annual GHG report must cover emissions from stationary fuel combustion sources only.
  - (i) The facility does not meet the requirements of either paragraph (a)(1) or (a)(2) of this section.
  - (ii) The aggregate maximum rated heat input capacity of the stationary fuel combustion units at the facility is 30 MMBtu/hour or greater.
  - (iii) The facility emits 25,000 metric tons CO<sub>2</sub>e or more per year in combined emissions from all stationary fuel combustion sources.

Robbins Lumber does not contain any source categories listed in Tables A-3 or A-4 of 40 CFR Part 98, Subpart A.

Emissions of CO<sub>2</sub> from the combustion of biomass are excluded from paragraph (a)(3)(iii) above. Therefore, Robbins Lumber does not meet all three conditions listed in paragraph (a)(3) above. Therefore, Robbins Lumber is not required to fulfill the recordkeeping and reporting requirements of 40 CFR Part 98.

#### **E. Compliance Assurance Monitoring (CAM)**

40 CFR Part 64, *Compliance Assurance Monitoring*, 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 tons/year for any pollutant.

Boiler #2 has emissions greater than 100 tpy of CO. However, Robbins Lumber does not use add-on control equipment to meet the CO emission limit on this boiler.

Boilers #1 and #2 use multiclones to meet the emission limits for PM in this license. However, pre-control emissions of PM are estimated to be less than 100 tpy for each of these units.

Therefore, CAM does not apply to any emission units at this facility.

#### F. Boilers #1 and #2

Boiler #1 is a wood-fired boiler manufactured and installed in 1976. It was designed with a maximum heat input capacity of 21.3 MMBtu/hr. The wood fired by Boiler #1 consists of wood chips with smaller amounts of sawdust and other forest residue.

Boiler #2, typically used as the main boiler, is a wood-fired boiler manufactured by the Industrial Boiler Co. and installed in 1986. It was designed with a maximum heat input capacity of 49.33 MMBtu/hr. The wood fired by Boiler #2 consists of wood chips with smaller amounts of sawdust and other forest residue.

Boilers #1 and #2 share a fuel limit of 48,000 ton/year of wood or an equivalent amount on a heat input basis. The wood fuel limit listed in this license is based on wood containing 50% moisture by weight. Robbins Lumber can use the following formula for converting fuel use records to 50% moisture:

$$\text{Tons Wood at 50\%} = (\text{Tons Wood at M\%}) \times [(100-M)/50]$$

where M = the moisture content of the actual wood fired

Boiler #2 may also fire up to 200 gallons per month (2,400 gallons per year on a 12-month rolling total basis) of specification waste oil generated on-site by Robbins Lumber. The specification waste oil may be mixed with the wood fuel prior to burning. A sample waste oil test result shall be kept on file at the facility demonstrating compliance with the requirements of specification waste oil. Upon request by the Department, Robbins Lumber shall test additional representative samples of the waste oil to demonstrate that the oil being burned continues to meet the requirements of specification waste oil.

Emissions from Boiler #1 exit through Stack #1 which has an above ground level height of 65 feet. Emissions from Boiler #2 exit through Stack #2 which has an above ground level height of 73 feet.

#### 1. New Source Performance Standards (NSPS)

Boilers #1 and #2 are not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 CFR 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. Boilers #1 and #2 were each constructed prior to the applicability date of this rule.

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

Boilers #1 and #2 are subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63, Subpart JJJJJ). They are considered existing biomass-fired boilers. The requirements of this subpart are covered in a separate section below.

3. Control Equipment

Emissions of particulate matter from Boilers #1 and #2 are each controlled by two ZURN multi-cyclone separators in series (i.e. two multi-cyclones for each boiler).

4. Emission Limits and Streamlining

For Boiler #1 a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

<b>Boiler #1</b>			
<b>Pollutant</b>	<b>Applicable Emission Standards</b>	<b>Origin and Authority</b>	<b>Licensed Emission Limits</b>
PM	0.49 lb/MMBtu	06-096 CMR 103, §2(A)(3)(a)	0.20 lb/MMBtu*
	0.20 lb/MMBtu	06-096 CMR 140, BPT (A-156-74-D-R)	
	4.3 lb/hr	06-096 CMR 140, BPT (A-156-70-A-I)	
PM <sub>10</sub>	4.3 lb/hr	06-096 CMR 140, BPT (A-156-70-A-I)	4.3 lb/hr
SO <sub>2</sub>	0.2 lb/hr	06-096 CMR 140, BPT (A-156-70-A-I)	0.2 lb/hr
NO <sub>x</sub>	0.30 lb/MMBtu	06-096 CMR 140, BPT (A-156-74-D-R)	0.30 lb/MMBtu
	6.4 lb/hr	06-096 CMR 140, BPT (A-156-74-D-R)	6.4 lb/hr
CO	7.1 lb/hr	06-096 CMR 140, BPT (A-156-70-A-I)	7.1 lb/hr
VOC	2.1 lb/hr	06-096 CMR 140, BPT (A-156-74-D-R)	2.1 lb/hr



Visible Emissions	30% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period	06-096 CMR 101, §2(B)(1)(e)	30% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period
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Table Notes: \* streamlining requested

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, and the applicable emission limits can be found below.

<b>Boiler #2</b>			
<b>Pollutant</b>	<b>Applicable Emission Standards</b>	<b>Origin and Authority</b>	<b>Licensed Emission Limits</b>
PM	0.30 lb/MMBtu	06-096 CMR 103, §2(B)(4)(a)	0.20 lb/MMBtu*
	0.20 lb/MMBtu	06-096 CMR 140, BPT (A-156-74-D-R)	
	9.9 lb/hr	06-096 CMR 140, BPT (A-156-70-A-I)	9.9 lb/hr
PM <sub>10</sub>	9.9 lb/hr	06-096 CMR 140, BPT (A-156-70-A-I)	9.9 lb/hr
SO <sub>2</sub>	0.4 lb/hr	06-096 CMR 140, BPT (A-156-72-C-A/R)	0.4 lb/hr
NO <sub>x</sub>	0.30 lb/MMBtu	06-096 CMR 140, BPT (A-156-74-D-R)	0.30 lb/MMBtu
	14.8 lb/hr	06-096 CMR 140, BPT (A-156-74-D-R)	14.8 lb/hr
CO	36.5 lb/hr	06-096 CMR 140, BPT (A-156-72-C-A/R)	36.5 lb/hr
VOC	4.9 lb/hr	06-096 CMR 140, BPT (A-156-72-C-A/R)	4.9 lb/hr
Visible Emissions	30% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period	06-096 CMR 101, §2(B)(1)(e)	30% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period

Table Notes: \* streamlining requested

5. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boilers #1 and #2 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

6. Periodic Monitoring

Robbins Lumber shall monitor and record the following periodic monitors for Boilers #1 and #2 and their associated air pollution control equipment.

- a. Tons of wood fired in the boilers on a monthly and 12-month rolling total basis.
- b. Gallons of specification waste oil fired in Boiler #2 on a monthly and 12-month rolling total basis.
- c. Records of a representative sample of waste oil demonstrating it meets the requirements to be considered specification waste oil.
- d. Records of all multi-cyclone monthly inspections and any maintenance activities performed.

7. Parameter Monitors

There are no Parameter Monitors required for Boilers #1 or #2.

8. CEMS and COMS

There are no continuous emission monitoring systems (CEMS) or continuous opacity monitoring systems (COMS) required for Boilers #1 or #2.

**G. NESHAP 40 CFR Part 63, Subpart JJJJJ**

Boilers #1 and #2 are subject to 40 CFR Part 63, Subpart JJJJJ. Notification forms and additional rule information can be found on the following website: <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

1. Compliance Dates, Notifications, and Work Practice Requirements

a. Initial Notification of Compliance

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

b. Boiler Tune-Up Program

- (1) A boiler tune-up program shall be implemented.  
[40 CFR Part 63.11196(a)(1)]
- (2) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

<b>Boiler Category</b>	<b>Tune-Up Frequency</b>
Existing Biomass fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below	Every 2 years
<b><i>Boilers with less frequent tune up requirements</i></b>	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

- (3) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
  - (i) 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 or 72 months from the previous inspection for boilers with oxygen trim systems, seasonal boilers, and limited use boilers.  
[40 CFR Part 63.11223(b)(1)]
  - (ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
  - (iii) 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 or 72 months from the previous inspection for boilers with oxygen trim systems, seasonal boilers, and limited use boilers.  
[40 CFR Part 63.11223(b)(3)]

- (iv) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
- (v) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]
- (vi) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR Part 63.11223(b)(7)]

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

- (i) 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;
- (ii) A description of any corrective actions taken as part of the tune-up of the boiler; and
- (iii) 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 CFR §63.11223(b)(6)]

(5) After conducting the initial boiler tune-up, a Notification of Compliance Status should have been submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]

c. Compliance Report:

A compliance report shall be prepared by March 1<sup>st</sup> biennially or every five years (depending on the tune-up schedule) which covers the previous two (or five) calendar years. The report shall be maintained by the source and submitted to the Department and to the EPA upon request. The report must include the items contained in §63.11225(b)(1) and (2), including the following: [40 CFR §63.11225(b)]

- (1) Company name and address;

- (2) A statement of whether the source has complied with all the relevant requirements of this Subpart;
- (3) 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;
- (4) The following certifications, as applicable:
  - (i) "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."
  - (ii) "No secondary materials that are solid waste were combusted in any affected unit."
  - (iii) "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. Energy Assessment

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

- (1) A one-time energy assessment was required to be performed by a qualified energy assessor on the applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(3)]
- (2) The energy assessment was required to include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major energy use systems consuming energy from affected boilers and which are under control of the boiler owner or operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments. [40 CFR Part 63, Table 2(4)]
- (3) A Notification of Compliance Status was required to be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(c)]

2. Recordkeeping

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

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

Records shall be in a form suitable and readily available for expeditious review.

EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [63.1125(a)(4)(vi)]

**H. Generator #1**

Robbins Lumber operates one emergency generator, Generator #1. The emergency generator is a generator set with the gen set consisting of an engine and an electrical generator. Generator #1 uses a Caterpillar 3516B engine which was manufactured in 1986 and installed in 2001. The generator engine has a maximum heat input capacity of 18.7 MMBtu/hr and fires distillate fuel with a maximum sulfur content of 0.0015% by weight.

In the previous Part 70 license renewal, Generator #1 was allowed to be operated to assist in offsetting purchased power and for back-up and emergency use when the boilers were down. In New Source Review (NSR) Amendment A-156-77-1-M, issued 1/6/14, Robbins Lumber modified their license to restrict Generator #1 to only those operations that meet the emergency generator definition and requirements in 40 CFR Part 63, Subpart ZZZZ.

1. New Source Performance Standards (NSPS)

Generator #1 is not subject to federal regulation 40 CFR Part 60, Subpart III, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, because it was manufactured prior to April 1, 2006.

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

The federal regulation 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines* is applicable to Generator #1. It is considered an existing, emergency stationary reciprocating internal combustion engine 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.

Robbins Lumber is currently enrolled in ISO New England's Demand Response Program for Real-Time Emergency Generators. Robbins Lumber has stated that according to ISO New England and EPA, participation in the program meets the requirements for emergency engines under the applicable subparts of Part 60 and Part 63. To be considered an emergency engine, Robbins Lumber shall only operate Generator #1 in accordance with the rule's emergency requirements. It is Robbins Lumber's responsibility to ensure that operations under any Demand Response Program it enrolls in is allowed under the emergency definition.

a. Emergency Definition:

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

- (1) The stationary RICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc. There is no time limit on the use of emergency stationary ICE in emergency situations.
- (2) Paragraph (1) above notwithstanding, the emergency stationary RICE may be operated for any combination of the purposes specified below for a maximum of 100 hours per calendar year:
  - (i) Maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or

equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

- (ii) Emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
  - (iii) Periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
- (3) Paragraphs (1) and (2) above notwithstanding, emergency stationary RICE may be operated for up to 50 hours per calendar year in non-emergency situations. These 50 hours are counted as part of the 100 hours per calendar year for maintenance checks and readiness testing, emergency demand response, and periods of voltage deviation or low frequency, as provided in paragraph (2) above.

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

- (i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution center.
- (ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
  - (a) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.



- (b) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
- (c) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
- (d) The power is provided only to the facility itself or to support the local transmission and distribution system.
- (e) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

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

b. 40 CFR Part 63, Subpart ZZZZ Requirements:

(1) Operation and Maintenance Requirements

	<b>Operating Limitations (40 CFR §63.6603(a) and Table 2(d))</b>
Compression ignition units:	<ul style="list-style-type: none"> <li>- Change oil and filter every 500 hours of operation or annually, whichever comes first;</li> <li>- Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and</li> <li>- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</li> </ul>

Generator #1 shall be operated and maintained according to the manufacturer's emission-related written instructions or Robbins Lumber 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 CFR §63.6625(e)]

**(2) Optional Oil Analysis Program**

Robbins Lumber 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, Robbins Lumber must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR §63.6625(i)]

**(3) Non-Resettable Hour Meter Requirement**

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

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

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

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

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

**(6) Recordkeeping**

Robbins Lumber shall keep records that include maintenance conducted on Generator #1 and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency. If the engines are operated during a period of demand response or deviation from standard voltage or frequency, or to supply power during a non-emergency situation as part of a financial arrangement with another entity as specified in §63.6640(f)(4)(ii),

Robbins Lumber shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [40 CFR §63.6655(e) and (f)]

(7) Requirements for Demand Response Availability Over 15 Hours Per Year

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

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

[40 CFR §63.6650(h)]

3. Emission Limits and Streamlining

For Generator #1, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.12 lb/MMBtu	06-096 CMR 103, §2(B)(1)(a)	0.12 lb/MMBtu
	2.2 lb/hr	06-096 CMR 140, BPT (A-156-71-N-A)	2.2 lb/hr
PM <sub>10</sub>	2.2 lb/hr	06-096 CMR 140, BPT (A-156-71-N-A)	2.2 lb/hr
SO <sub>2</sub>	0.03 lb/hr (based on 0.0015% S limit, by weight)	06-096 CMR 140, BPT (A-156-77-1-M)	0.03 lb/hr
NO <sub>x</sub>	38.08 lb/hr	06-096 CMR 140, BPT (A-156-71-N-A)	38.08 lb/hr
CO	3.13 lb/hr	06-096 CMR 140, BPT (A-156-71-N-A)	3.13 lb/hr
VOC	1.15 lb/hr	06-096 CMR 140, BPT (A-156-71-N-A)	1.15 lb/hr
Visible Emissions	30% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period	06-096 CMR 101, §2(B)(1)(f)	20% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period*
	20% opacity on a six (6) minute block average basis except for two (2) six (6) minute block averages in a 3-hr period	06-096 CMR 140, BPT (A-156-71-N-A)	

Table Notes: \* streamlining requested  
% S = percent fuel sulfur, by weight

4. Emission Limit Compliance Methods

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

5. Periodic Monitoring

Robbins Lumber shall monitor and record the following periodic monitors for Generator #1.

- a. Hours of operating time on a calendar year basis.
- b. Log of the reason for all operating time as it occurs.
- c. Records of all maintenance conducted.
- d. Sulfur content of the distillate fuel fired based on fuel receipts from the supplier.

6. Parameter Monitors

There are no Parameter Monitors required for Generator #1.

7. CEMS and COMS

There are no CEMS or COMS required for Generator #1.

**I. Drying Kilns**

Robbins Lumber utilizes kilns to dry lumber before sale. Robbins Lumber predominantly dries eastern white pine. Air Emission License A-156-70-A-I established a kiln through-put restriction of 40 MMBF/yr. Using a factor of 2.26 pounds of VOC released in the kiln drying process for every 1,000 BF of white pine dried, Robbins Lumber is restricted to an annual VOC emission limit from kiln operations of no greater than 45.2 tons of VOC per year based on a twelve-month rolling total.

Periodic Monitoring

Robbins Lumber shall record the quantity of wood dried in the kilns on a monthly and 12-month rolling total basis.

**J. Blowers, Conveyors, Cyclones, and Silos**

Robbins Lumber operates process cyclones throughout the facility for capturing wood dust, shavings, and other small wood particles that are suspended in air exhaust streams. Blowers convey the wood waste from the process equipment (including saws, planers, and wood conveying belts) through the cyclones. The material passes through the cyclones and continues on to silos for storage or to another final use. The cyclones vent to the atmosphere.

1. Emission Limits and Streamlining

For the cyclones, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested, and the applicable emission limits can be found below.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
Visible Emissions	20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block avg in a 1-hr period	06-096 CMR 101, §2(B)(3)(d)	10% opacity on a six (6) minute block average basis*
	10% opacity on a six (6) minute block average basis	06-096 CMR 140, BPT (A-156-71-G-A)	

Table Notes: \* streamlining requested

2. Periodic Monitoring

Robbins Lumber shall record the following periodic monitors for the cyclones:

- a. Records of monthly inspections of each cyclone.
- b. Records of all cyclone maintenance activities.

**K. Biocide Dip Tank**

The biocide dipping process is used by Robbins Lumber to prevent fungal growth causing wood deterioration or stains on lumber that will be held over in storage for a period of time before being processed. The dip tank has a 4,200 gallon capacity. There is also a 5,000 gallon storage tank to store biocide over the winter to prevent freezing. Typically, Robbins Lumber uses approximately 100 to 200 gallons of biocide per year.

The biocide used by Robbins Lumber is normally mixed with water at a ratio of 1 gallon of biocide to 100 gallons of water.

The biocide dipping process shall have a VOC limit of 0.9 tons VOC/yr, on a 12 month rolling total basis. Different biocide chemicals may be used without a license change, but emissions from the process must remain under the VOC limit of 0.9 tons/year.

Periodic Monitoring

Robbins Lumber shall monitor and record the following periodic monitors for the Biocide Dip Tank.

1. Amount of biocide used on a monthly and 12-month rolling total basis.
2. The percent by weight VOC and HAP content of the biocide.
3. Total VOC and HAP emitted from the Biocide Dip Process on a monthly and 12-month rolling total basis.

**L. Parts Washer**

Robbins Lumber has a parts washer in their maintenance shop. If the solvent used in this, or any other cold cleaning parts washer brought into the facility, is below 5% by weight of VOCs then *Solvent Cleaners*, 06-096 CMR 130 is not applicable. If the solvent content is above 5% by weight VOC, then 06-960 CMR 130 is applicable.

Periodic monitoring for the degreaser units shall consist of recordkeeping to document VOC content of the solvent. If the solvent content is over 5% by weight of VOC, then recordkeeping shall also include documentation of the amount of solvent added and removed.

**M. Facility Annual Emissions**

1. Total Annual Emissions

Robbins Lumber is licensed for the following annual emissions, based on a 12 month rolling total. The tons per year limits were calculated based on the following:

- Firing 48,000 ton/year of wood at 50% moisture in the boilers
- Operating Generator #1 for 100 hr/year
- A kiln throughput of 40 MMBF/year
- A limit of 0.9 tpy of VOC from the Biocide Dip Tank

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

	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Boilers	43.2	43.2	1.9	64.8	159.8	21.6
Generator #1	0.1	0.1	–	1.9	0.2	0.1
Kilns	–	–	–	–	–	45.2
Biocide Dip Tank	–	–	–	–	–	0.9
<b>Total TPY</b>	<b>43.3</b>	<b>43.3</b>	<b>1.9</b>	<b>66.7</b>	<b>160.0</b>	<b>67.8</b>

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

2. Greenhouse Gases

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

The quantity of CO<sub>2</sub>e emissions from this facility is less than 100,000 tons per year, based on the following:

- the facility’s fuel use limits;
- 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**

Robbins Lumber 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-156-71-M-A, issued on 6/14/01). 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-156-70-D-R pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 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 Robbins Lumber pursuant to the Department's preconstruction permitting requirements in 06-096 CMR 108 or 115 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 permit. As such, the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 CMR 115 for making such changes and pursuant to the applicable requirements in 06-096 CMR 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, 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 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 CMR 140]

- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [06-096 CMR 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 CMR 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 CMR 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 CMR 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 their renewal application.

**Permit Shield Table**

Source	Citation	Description	Basis for Determination
Kilns	06-096 CMR 134	VOC RACT	Exempt per 06-096 CMR 134, Section (1)(C)(6)
Boilers #1 & #2	06-096 CMR 134	VOC RACT	Exempt per 06-096 CMR 134, Section (1)(C)(4)
Boilers #1 & #2	06-096 CMR 138	NO <sub>x</sub> RACT	Facility is limited to less than 100 tpy for NO <sub>x</sub>
Boilers #1 & #2	06-096 CMR 145	NO <sub>x</sub> Control Program	Maximum heat input for each boiler less than 250 MMBtu/hr
Boilers #1 & #2	40 CFR 60, Subpart D	NSPS for Fossil-Fuel-Fired Steam Generators	Maximum heat input for each boiler less than 250 MMBtu/hr
Boilers #1 & #2	40 CFR 60, Subpart Db	NSPS for Industrial-Commercial-Institutional Steam Generating Units	Maximum heat input for each boiler less than 100 MMBtu/hr
Boilers #1 & #2	40 CFR 60, Subpart Dc	NSPS for Small Industrial-Commercial-Institutional Steam Generating Units	Each of these boilers commenced construction prior to June 9, 1989.
Generator #1	40 CFR 60, Subpart III	NSPS for Stationary Compression Ignition Internal Combustion Engines	Generator #1 was constructed prior to the applicability date.
Boilers #1 & #2	40 CFR Part 63, Subpart DDDDD	NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters	Facility is not a major source of HAP.
Facility	40 CFR Part 64	Compliance Assurance Monitoring	Facility does not have equipment that meets all applicability requirements
Facility	40 CFR 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 <sub>2e</sub> .

[06-096 CMR 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 3 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 CMR 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 CMR 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 CMR 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.A. §347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140. [06-096 CMR 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 CMR 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.A. §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 CMR 140]  
**Enforceable by State-only**
- (6) 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 CMR 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 CMR 140]
- (8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- A. perform stack testing 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 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
- C. submit a written report to the Department within thirty (30) days from date of test completion.  
[06-096 CMR 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 CFR Part 60 or other method approved or required by the Department; and
  - B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
  - C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.  
[06-096 CMR 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.A. § 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 CMR 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 CMR 140]

(12) The licensee shall submit semiannual reports of any required periodic monitoring. 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 CMR 140]

- (13) The licensee shall submit a compliance certification to the Department and EPA at least annually, 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 CMR 140]

#### **SPECIFIC CONDITIONS**

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

A. Allowable Fuels

- 1. Boilers #1 and #2 are licensed to fire wood. Boiler #2 is also licensed to fire specification waste oil (as defined by the Bureau of Remediation and Waste Management). [06-096 CMR 140, BPT and 06-096 CMR 860]
- 2. Robbins Lumber shall not exceed a total annual fuel limit of 48,000 tons of wood at 50% moisture per year, or equivalent, in Boilers #1 and #2 combined based on a 12-month rolling total. [06-096 CMR 140, BPT (A-156-71-L-A)]
- 3. Robbins Lumber may fire up to 200 gallons per month (2,400 gal/year based on a 12-month rolling total) of specification waste oil in Boiler #2. [06-096 CMR 140, BPT (A-156-71-H-M)]
- 4. Only specification waste oil generated by Robbins Lumber (i.e. from Robbins Lumber owned trucks and other Robbins Lumber owned operating motorized equipment) shall be fired in Boiler #2. A sample waste oil test result shall be kept on file at the facility demonstrating compliance with the requirements of specification waste oil. Upon request by the Department, Robbins Lumber shall test additional representative samples of waste oil. [06-096 CMR 140, BPT (A-156-71-H-M)]



B. Boiler #1 Emission Limits

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

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	06-096 CMR, 140, BPT (A-156-74-D-R)	Federally Enforceable
NO <sub>x</sub>	0.30	06-096 CMR 140, BPT (A-156-74-D-R)	<b>Enforceable by State-only</b>

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	4.3	06-096 CMR 140, BPT (A-156-70-A-I)	<b>Enforceable by State-only</b>
PM <sub>10</sub>	4.3	06-096 CMR 140, BPT (A-156-70-A-I)	<b>Enforceable by State-only</b>
SO <sub>2</sub>	0.2	06-096 CMR 140, BPT (A-156-70-A-I)	<b>Enforceable by State-only</b>
NO <sub>x</sub>	6.4	06-096 CMR 140, BPT (A-156-74-D-R)	<b>Enforceable by State-only</b>
CO	7.1	06-096 CMR 140, BPT (A-156-70-A-I)	<b>Enforceable by State-only</b>
VOC	2.1	06-096 CMR 140, BPT (A-156-74-D-R)	<b>Enforceable by State-only</b>

2. Visible emissions from Boiler #1 shall not exceed 30% opacity on a six (6) minute block average basis, except no more than two (2) six minute block averages in a 3-hour block period. [06-096 CMR 101]

C. Boiler #2 Emission Limits

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

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	06-096 CMR, 140, BPT (A-156-74-D-R)	Federally Enforceable
NO <sub>x</sub>	0.30	06-096 CMR 140, BPT (A-156-74-D-R)	<b>Enforceable by State-only</b>

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	9.9	06-096 CMR 140, BPT (A-156-70-A-I)	Enforceable by State-only
PM <sub>10</sub>	9.9	06-096 CMR 140, BPT (A-156-70-A-I)	Enforceable by State-only
SO <sub>2</sub>	0.4	06-096 CMR 140, BPT (A-156-72-C-A/R)	Federally Enforceable
NO <sub>x</sub>	14.8	06-096 CMR 140, BPT (A-156-74-D-R)	Enforceable by State-only
CO	36.5	06-096 CMR 140, BPT (A-156-72-C-A/R)	Federally Enforceable
VOC	4.9	06-096 CMR 140, BPT (A-156-72-C-A/R)	Federally Enforceable

2. Visible emissions from Boiler #2 shall not exceed 30% opacity on a six (6) minute block average basis, except no more than two (2) six minute block averages in a 3-hour block period. [06-096 CMR 101]

#### D. Control Equipment

1. Robbins Lumber shall control particulate matter emissions from Boilers #1 and #2 by use of dual multi-cyclones on each boiler. [06-096 CMR 140, BPT]
2. Robbins Lumber shall inspect the multi-cyclones at least once per month. [06-096 CMR 140, BPT (A-156-70-C-R)]

#### E. Periodic Monitoring

Robbins Lumber shall monitor and record the following periodic monitors for Boilers #1 & #2 and their associated air pollution control equipment:

1. Tons of wood fired in the boilers on a monthly and 12-month rolling total basis. [06-096 CMR 140, BPT (A-156-74-D-R)]
2. Gallons of specification waste oil fired in Boiler #2 on a monthly and 12-month rolling total basis. [06-096 CMR 140, BPT (A-156-71-H-M)]
3. Records of a representative sample of waste oil demonstrating it meets the requirements to be considered specification waste oil. [06-096 CMR 140, BPT (A-156-70-C-R)]
4. Records of all multi-cyclone monthly inspections and any maintenance activities performed. [06-096 CMR 140, BPT (A-156-70-C-R)]

F. 40 CFR Part 63, Subpart JJJJJ Requirements for Boilers #1 and #2

1. The facility shall implement a boiler tune-up program. [40 CFR Part 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. See chart below:

<b>Boiler Category</b>	<b>Tune-Up Frequency</b>
Existing Biomass fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below	Every 2 years
<b><i>Boilers with less frequent tune up requirements</i></b>	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR 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 or 72 months from the previous inspection for boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 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 CFR Part 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 or 72 months from the previous inspection for boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]

- (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 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 CFR Part 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 CFR Part 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 CFR §63.11223(b)(6)]
- (d) After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]

## 2. Compliance Report

A compliance report shall be prepared by March 1<sup>st</sup> biennially or every five years (depending on the tune-up schedule) which covers the previous two (or five) calendar years. The report shall be maintained by the source and submitted to the Department and to the EPA upon request. The report must include the items contained in §63.11225(b)(1) and (2), including the following: [40 CFR §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 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)."
3. Energy Assessment
- (a) A one-time energy assessment was required to be performed by a qualified energy assessor on the applicable boilers. [40 CFR Part 63.11196(a)(3)]
  - (b) The energy assessment was required to include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints; an inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments. [40 CFR 63, Table 2(4)]
  - (c) A Notification of Compliance Status was required to be submitted to EPA. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(c)]
4. Records shall be maintained consistent with the requirements of 40 CFR Part 63, Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]:
- (a) Copies of notifications and reports with supporting compliance documentation;
  - (b) Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
  - (c) Records of the occurrence and duration of each malfunction of each applicable boiler; and

- (d) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [63.1125(a)(4)(vi)]

(15) **Generator #1**

A. Allowable Operation and Fuels

1. Generator #1 is licensed to fire distillate fuel. [06-096 CMR 140, BPT (A-156-71-N-A)]
2. Generator #1 is limited to 100 hours per year total operation, based on a calendar year, excluding operating hours during emergency situations. [06-096 CMR 140, BPT (A-156-77-1-M)]

B. Fuel Sulfur Content

1. The fuel oil sulfur content for Generator #1 shall be limited to 0.0015% sulfur by weight. [06-096 CMR 140, BPT (A-156-77-1-M)]
2. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 CMR 140, BPT (A-156-77-1-M)]

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

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	06-096 CMR 103, §2(B)(1)(a)	Federally Enforceable

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	2.2	06-096 CMR 140, BPT (A-156-71-N-A)	Federally Enforceable
PM <sub>10</sub>	2.2	06-096 CMR 140, BPT (A-156-71-N-A)	Federally Enforceable
SO <sub>2</sub>	0.03	06-096 CMR 140, BPT (A-156-77-1-M)	Federally Enforceable
NO <sub>x</sub>	30.08	06-096 CMR 140, BPT (A-156-71-N-A)	Federally Enforceable
CO	3.13	06-096 CMR 140, BPT (A-156-71-N-A)	Federally Enforceable
VOC	1.15	06-096 CMR 140, BPT (A-156-71-N-A)	Federally Enforceable

D. Visible Emissions

Visible emissions from Generator #1 shall not exceed 20% opacity on a 6-minute block average, except for no more than two (2) six (6) minute block averages in a 3-hour period. [06-096 CMR 140, BPT (A-156-71-N-A)]

E. Periodic Monitoring

Robbins Lumber shall monitor and record the following periodic monitors for Generator #1:

1. Hours of operating time on a calendar year total basis. [40 CFR §63.6655(f)]
2. Log of the reason for all operating time as it occurs. [40 CFR §63.6655(f)]
3. Records of all maintenance conducted. [40 CFR §63.6655(e)]
4. Sulfur content of distillate fuel fired based on fuel receipts from the supplier. [06-096 CMR 140, BPT (A-156-77-1-M)]

F. Generator #1 shall meet the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, including the following:

1. Robbins Lumber shall meet the following operational limitations for Generator #1:
  - (a) Change the oil and filter annually,
  - (b) Inspect the air cleaner annually, and
  - (c) Inspect the hoses and belts annually and replace as necessary.

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

[40 CFR §63.6603(a) and Table 2(d)]

2. Oil Analysis Program Option

Robbins Lumber 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, Robbins Lumber must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

[40 CFR §63.6625(i)]

3. Non-Resettable Hour Meter  
A non-resettable hour meter shall be installed and operated on the engine. [40 CFR §63.6625(f)]
4. Maintenance, Testing, and Non-Emergency Operating Situations
  - (a) Generator #1 shall be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity unless the conditions in §63.6640(f)(4)(ii) are met). These limits are based on a calendar year. Compliance shall be demonstrated by a written log of all engine operating hours. [40 CFR §63.6640(f)]
  - (b) Robbins Lumber 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 hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency. If the engines are operated during a period of demand response or deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in §63.6640(f)(4)(ii), the Robbins Lumber must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [40 CFR §63.6655(e) and (f)]
5. Operation and Maintenance  
Generator #1 shall be operated and maintained according to the manufacturer's emission-related written instructions, or Robbins Lumber 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 CFR §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, after which time the non-startup emission limitations apply. [40 CFR §63.6625(h) & 40 CFR Part 63, Subpart ZZZZ Table 2d]



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

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

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

[40 CFR §63.6650(h)]

(16) **Drying Kilns**

- A. Robbins Lumber shall be limited to drying a total of 40 MMBF of lumber per year in the facility's drying kilns based on a 12-month rolling total. [06-096 CMR 140, BPT (A-156-70-A-I)]
- B. As a periodic monitoring requirement, Robbins Lumber shall maintain records indicating the quantity of wood dried in BF. The kiln production records shall be maintained on a monthly and a 12-month rolling total basis. [06-096 CMR 140, BPT (A-156-70-A-I)]

(17) **Process Equipment** (blower, conveyor and cyclone systems, and storage silos)

- A. Visible emissions from any general process source (including the wood waste blowers, conveyor and cyclone systems, and the storage silos) shall not exceed an opacity of 10% on a six (6) minute block average basis. [06-096 CMR 140, BPT (A-156-71-G-A & A-156-70-B-A)]

B. Periodic Monitoring

Robbins Lumber shall monitor and record the following periodic monitors for the cyclones:

1. Records of monthly inspections of each cyclone.  
[06-096 CMR 140, BPT (A-156-70-B-A)]
2. Records of all cyclone maintenance activities.  
[06-096 CMR 140, BPT (A-156-71-G-A)]

(18) **Biocide Dip Tank**

A. Robbins Lumber shall not exceed VOC emissions of 0.9 tons/yr from the Biocide Dipping Operation based on a 12 month rolling total. [06-096 CMR 140, BPT (A-156-70-A-I)]

B. Periodic Monitoring

Robbins Lumber shall monitor and record the following periodic monitors for the Biocide Dip Tank:

1. Amount of biocide used on a monthly and 12-month rolling total basis.  
[06-096 CMR 140, BPT (A-156-70-A-I)]
2. The percent by weight VOC and HAP content of the biocide. [06-096 CMR 140, BPT (A-156-70-A-I)]
3. Total VOC and HAP emitted from the Biocide Dip Process on a monthly and 12-month rolling total basis. [06-096 CMR 140, BPT (A-156-70-A-I)]

(19) **Facility HAP Emissions**

A. Robbins Lumber shall be limited to 24.9 tons/year of total HAPs and 9.9 tons/year of any individual HAP. [06-096 CMR 140, BPT (A-156-70-C-R)]

B. As a periodic monitoring requirement, Robbins Lumber shall keep monthly and 12 month rolling total records of HAPs emissions from the facility (including HAP emissions calculated from the biocide dipping operations, fuel burning equipment, and the drying kilns). [06-096 CMR 140, BPT (A-156-70-A-I)]

(20) **Parts Washer**

Parts washers at Robbins Lumber are subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended).

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

(21) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed an opacity of 20 percent, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20 percent in any one (1) hour. [06-096 CMR 101]

(22) **Semiannual Reporting** [06-096 CMR 140]

- A. The licensee shall submit to the Bureau of Air Quality semiannual reports which are due on **January 31<sup>st</sup>** and **July 31<sup>st</sup>** 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 before the due date or if the report is received by the DEP within seven calendar days of the due date.
- C. 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.

(23) **Annual Compliance Certification**

Robbins Lumber 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 31 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 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 CMR 140]

(24) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), the licensee 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 by the date specified in 06-096 CMR 137.

(25) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
06-096 CMR 102	Open Burning	-
06-096 CMR 109	Emergency Episode Regulation	-
06-096 CMR 110	Ambient Air Quality Standard	-
06-096 CMR 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, §§5	Mercury Emission Limit	Enforceable by State-only

(26) **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 CFR 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 CFR, Part 82, Subpart F]

(27) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Robbins Lumber shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

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

A. Robbins Lumber shall submit a complete Part 70 renewal application at least 6 months prior, but no more than 18 months prior, to the expiration of this air license.

B. Pursuant to Title 5 MRSA §10002, and 06-096 CMR 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 CMR 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**

Robbins Lumber, Inc.  
Waldo County  
Searsmont, Maine  
A-156-70-D-R

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

(29) New Source Review

Robbins Lumber is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emissions license and the NSR requirements remain in effect even if this 06-096 CMR 140 Air Emissions License, A-156-70-D-R, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 11 DAY OF August, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Maec Allen Robert Corne for  
PATRICIA W. AHO, 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 6 months prior to expiration but no earlier than 18 months, then pursuant to Title 5 MRSA §10002, all terms and conditions of the Part 70 license shall remain in effect until the Department takes final action on the renewal of the Part 70 license.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 4/29/14

Date of application acceptance: 5/1/14

Date filed with the Board of Environmental Protection:

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

