



DEPARTMENT ORDER

**Louisiana-Pacific Corporation  
Aroostook County  
New Limerick, Maine  
A-327-77-6-M**

**Departmental  
Findings of Fact and Order  
New Source Review  
NSR #6**

**FINDINGS OF FACT**

After review of the air emission license amendment 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 (the Department) finds the following facts:

**I. REGISTRATION**

A. Introduction

FACILITY	Louisiana-Pacific Corporation
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Revision
NAICS CODES	321219
NATURE OF BUSINESS	Reconstituted Wood Product Manufacturing
FACILITY LOCATION	240 Station Road, New Limerick, Maine

B. NSR License Description

Louisiana-Pacific Corporation (LP) has requested a New Source Review (NSR) license amendment to:

1. Clarify stack testing requirements for the facility's dryers;
2. Extend the deadline for this testing due to ongoing construction of the 2021 Expansion Project addressed in New Source Review (NSR) Air Emission License A-327-77-5-A (NSR #5) issued 3/5/2021; and
3. Correct a typographical error regarding the due date of the NO<sub>x</sub> testing for Line 1 Press.

C. Emission Equipment

The following equipment is addressed in this NSR license amendment:

**Process Equipment**

<b>Equipment</b>	<b>Description</b>	<b>Pollution Control Equipment</b>
Dryers (2)	Uses exhaust gases from CHU to dry strands/wafers at a max rate of 15.25 Oven Dried Ton (ODT)/hr	Wet ESP & RTO

D. Revision Description

1. Clarification

LP's Central Heating Unit (CHU) provides direct-contact heat to two rotary dryers (Dryers). Exhaust from the Dryers is controlled by cyclones, a wet electrostatic precipitator (WESP), and finally a regenerative thermal oxidizer (Dryer RTO).

Air Emission License A-327-70-H-A (6/30/2006) is considered an NSR major modification which addressed, among other items, performance testing requirements for the Dryers (see Conditions 25 and 26). The other equipment mentioned in those conditions has either been removed or the performance testing requirement has been superseded by a newer NSR requirement. Although the Dryers were direct-fired units at the time of issuance of A-327-70-H-A, the performance testing requirements have never been replaced in the facility's NSR license.

These conditions contain outdated language that refers to stack testing for particulate matter (PM) "each even numbered year" and for nitrogen oxides (NO<sub>x</sub>) "once per 5-year license term." LP has requested that the Department clarify that the intent was for testing to be performed at least once every other calendar year (i.e., once every two years) for PM and at least once every five calendar years for NO<sub>x</sub>. The Department agrees that this clarification is appropriate.

2. Test Deadline Extension Due to Construction

The Dryers dry wood to be used in the Line 1 Press (previously referred to as the OSB Press). Physical modifications to Line 1 Press were addressed in NSR #5, and those physical modifications are currently under construction.

Periodic performance testing is conducted on emissions from Line 1 Press to demonstrate compliance with licensed emission limits. To allow time for project

construction, NSR #5 extended the deadline to conduct performance testing on emissions from Line 1 Press such that the earliest test was due no later than 12/31/2022.

The Dryers were not considered affected units in NSR #5, and therefore, no revisions or changes were made to any licensed conditions associated with this equipment. The Dryers were last tested for PM in 2019, thus, the next PM performance test is due by the end of 2021. However, due to the integral nature of the Dryers to Line 1 Press and the construction associated with the 2021 Expansion Project, LP has requested that the PM performance test deadline for the Dryers be moved to 12/31/2022 to align with Line 1 Press. The Department agrees and approves of this request.

### 3. Correction of Line 1 Press Test Date

NSR #5 contains a typographical error. It states that the next performance test for NO<sub>x</sub> from Line 1 Press is due no later than 12/31/2025. However, performance testing was last done in 2019, meaning the next performance test is due no later than 12/31/2024.

### 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 submitted by LP does not violate any applicable federal or state requirements. The proposed revisions make no change to the facility's emission limits. Therefore, the NSR license is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 Code of Maine Rules (C.M.R.) ch. 115. An application to incorporate the requirements of this NSR license into the Part 70 air emission license has been submitted to the Department.

### F. Annual Emissions

This license amendment will not change the facility's licensed annual emissions.

## ORDER

The Department hereby grants New Source Review Minor Revision A-327-77-6-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the specific conditions below.

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

**SPECIFIC CONDITIONS**

**Conditions (25) and (26) of NSR Air Emission License A-327-70-H-A are Deleted.**

**The following shall replace Condition (1)(G) of NSR Air Emission License A-327-77-5-A:**

**(1) Line 1 Press**

G. LP shall demonstrate compliance with the NO<sub>x</sub> lb/hr emission limit for operation as an RCO through performance testing conducted every five calendar years. The next compliance test is due no later than 12/31/2024. [06-096 C.M.R. ch. 115, BPT]

**The following are New Conditions:**

**(2) CHU - Dryers**

A. LP shall demonstrate compliance with the PM gr/dscf and lb/hr emission limits for Stack #2 (Dryer RTO) through performance testing conducted at least once every other calendar year. The next compliance test is due no later than 12/31/2022. [06-096 C.M.R. ch. 115, BPT]

B. LP shall demonstrate compliance with the NO<sub>x</sub> lb/hr emission limit for Stack #2 (Dryer RTO) through performance testing conducted at least once every five calendar years. The next compliance test is due no later than 12/31/2024. [06-096 C.M.R. ch. 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 20<sup>th</sup> DAY OF OCTOBER, 2021.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for  
MELANIE LOYZIM, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 9/14/2021

Date of application acceptance: 9/16/2021

Date filed with the Board of Environmental Protection:

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

**FILED**  
OCT 20, 2021  
State of Maine  
Board of Environmental Protection