

<b>Robbins Lumber, Inc.</b>	)	<b>Department</b>
<b>Waldo County</b>	)	<b>Findings of Fact and Order</b>
<b>Searsmont, Maine</b>	)	<b>Part 70 Air Emission License</b>
<b>A-156-70-A-I</b>	)	

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

**I. Registration**

A. Introduction

FACILITY	Robbins Lumber, Inc.
LICENSE NUMBER	A-156-70-A-I
LICENSE TYPE	Initial Part 70 License
NAICS CODES	321912, 321113, 321999
NATURE OF BUSINESS	Lumber Manufacturing
FACILITY LOCATION	Ghent Road, Searsmont
DATE OF LICENSE ISSUANCE	<b>December 20, 2002</b>
LICENSE EXPIRATION DATE	<b>December 20, 2007</b>

B. Emission Equipment

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

<b>EMISSION UNIT ID</b>	<b>UNIT CAPACITY</b>	<b>UNIT TYPE</b>
Drying Kilns	40 MMBF/yr <sup>(1)</sup>	Process Equipment
Shaving Silo (Planer Mill #2) - Cyclone	15.0 MMBF/yr	Silo for planers, saws, sanders
Main Cyclone #1 Silo	15.0 MMBF/yr	Process Equipment
Main Cyclone #2 Silo	25 MMBF/yr	Process Equipment
Bagger two – Cyclone	25 MMBF/yr	Process Equipment
Planar Mill #3 – Cyclone	25 MMBF/yr	Process Equipment
Cut-up Shop – Cyclone	2 MMBF/yr	Process Equipment
Sawmill Resaw – Cyclone	14 MMBF/yr	Process Equipment
Spray Booth	325 gal/yr of paint	0.125 gal/hr paint sprayer
Ink Labeling Process	10-15 gal/yr of ink	Continuous Ink Jet Process
Biocide Dipping Process	700 gal/yr of Biocide	4,200 Gallon Dipping Tank
Parts Washer	15 gallon degreaser	Citrus Based Degreaser

2. The following fuel burning emission units are addressed by this Part 70 License:

<b>EMISSION UNIT ID</b>	<b>UNIT CAPACITY</b>	<b>UNIT TYPE</b>
Boiler 1	21.3 MMBtu/hr <sup>(2)</sup>	Wood Burning
Boiler 2	49.33 MMBtu/hr	Wood Burning
Generator	18.7 MMBtu/hr	Diesel Fuel Burning (1800 kw)

- (1) MMBF/yr = Million Board Feet per Year
- (2) MMBtu/hr = Million British Thermal Units per Hour

Robbins Lumber, Inc. has additional insignificant activities that do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of Chapter 140 of the Department’s Regulations.

C. Application Classification

The application for Robbins Lumber, Inc is considered to be an application for an Initial Part 70 License issued under Chapter 140 of the Department’s regulations for a Part 70 source.

**II. Emissions Unit Description**

A. Process Description

Robbins Lumber, Inc. (Robbins Lumber) produces lumber from white pine. Logs are brought on-site, weighed and catalogued through a computer system. The logs then go through a ring debarker. A separate ring debarker is used for large diameter logs. The logs are scanned for iron then go to one of two tracks (each track is the same). The log goes through a band saw controlled by computer automation. The sawmill waste is conveyed and sized. The sawdust is sold or is used as boiler fuel. Slabs are chipped and the chips are sold. Bark is sold as land mulch. There is an enclosed hammer mill for bark processing.

The wood then goes through an optimizing edger, a sorter, and to air dry storage. Following this initial storage, the boards are sent through the drying kilns and then to a dry storage. The board then goes on to the computerized planer mill. The wood waste from the planing operation is shredded for boiler fuel and the shavings are sold. There is also a dipping area to prevent ‘stain’ on the boards.

The fuel for the boilers includes whole tree chips from the lumbering operation, the sawmill waste, and sawdust from the planer mill. The fuel storage area is covered with a roof and three sides. The fuel mixture for the boiler is put in the feed bin when the bin gets low.

**B. Boiler # 1, wood boiler**

Boiler #1 was manufactured by the Industrial Boiler Co. in 1976. The boiler fires wood waste and has a maximum design heat input capacity of 21.3 MMBtu/hr. The boiler was manufactured prior to 1989; therefore, the boiler is not subject to EPA's New Source Performance Standards (NSPS), Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units).

The boiler has two ZURN multiple cyclone separators in series and exhausts through a 65.4 ft. stack. Boiler #1 is typically used as back-up for boiler #2.

Total fuel use for boiler #1 and boiler #2 combined shall be limited to 48,000 ton/year of wet wood based on a 12 month rolling total. Fuel usage is demonstrated by weighing all wood waste fuel before dumping it into the fuel storage building and maintaining a record of the quantity of fuel dumped.

Emissions for the boilers were based on previous licensed limits. These limits were calculated using AP-42 factors and vender supplied data.

**Streamlining**

**1. Opacity**

Robbins Lumber accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(1) of the Department's regulations is applicable, however, the Best Practical Treatment (BPT) opacity limit in this license is more restrictive.

**2. Particulate matter**

Robbins Lumber accepts streamlining for particulate emissions requirements. Chapter 103 Section 2 (A) (3) of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) particulate emissions limit is more restrictive.

**Periodic Monitoring**

Periodic monitoring shall consist of records indicating the amount of wood fired. The fuel records shall be kept on a monthly and a 12-month rolling total basis.

C. Boiler # 2, wood boiler

Boiler #2 was manufactured by the Industrial Boiler Co. in 1986. The boiler fires wood waste with a maximum design heat input capacity of 49.33 MMBtu/hr. The boiler may also fire specification waste oil mixed with the wood waste. The boiler was manufactured prior to 1989; therefore, the boiler is not subject to EPA's New Source Performance Standards (NSPS), Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units). Boiler #2 is typically used as the main boiler. The boiler is utilized for facility heat and drying kiln steam.

The boiler has two ZURN multiple cyclone separators in series and exhausts through a 73.33 ft stack.

Total fuel use for boiler #1 and boiler #2 combined shall be limited to 48,000 ton/year of wet wood based on a 12 month rolling total. Fuel usage is demonstrated by weighing all wood waste fuel before dumping it into the fuel storage building and maintaining a record of the quantity of fuel dumped.

Boiler #2 may be used to burn specification waste oil generated by the Robbins Lumber's Searsmont facility. Robbins Lumber may burn up to 200 gallons per month (2400 gallons per year based on a twelve month rolling total) of waste oil in Boiler #2. Only specification waste oil may be burned in the Robbins Lumber #2 Boiler. Upon the Department's request, Robbins Lumber shall test representative samples of the waste oil to demonstrate that the oil being burned meets the requirements of specification waste oil.

Emissions for the boilers were based on previous licensed limits. These limits were calculated using AP-42 factors and vender supplied data.

Streamlining

1. Opacity

Robbins Lumber accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(1) of the Department's regulations is applicable, however, the Best Practical Treatment (BPT) opacity limit in this license is more restrictive.

2. Particulate

Robbins Lumber accepts streamlining for particulate emissions requirements. Chapter 103 Section 2 (A) (3) of the Department's regulations is applicable; however, the Best Practical Treatment (BPT) particulate emissions limit is more restrictive.

Periodic Monitoring

Periodic monitoring shall consist of records indicating the amount of wood and waste oil burned. The fuel records shall be kept on a monthly and a 12-month rolling basis.

D. Diesel Generator

Robbins Lumber makes use of an 18.7 MMBtu/hr diesel generator for back-up and emergency use. The diesel generator is a Caterpillar 3516B generator and engine set. The diesel makes use of low NO<sub>x</sub> technology used in the Caterpillar B series generators which limits the unit to 22.8 tons per year of NO<sub>x</sub>. The diesel engine shall fire diesel fuel with a sulfur content not to exceed 0.05% sulfur by weight and shall be limited to 1200 hours per year based on a 12 month rolling total.

Emissions were based on previous licensed limits. These limits were calculated using AP-42 factors and manufacturer information.

Periodic Monitoring

In order to demonstrate compliance with operation limits set on the Diesel Generator, Robbins Lumber shall install an hour meter on the diesel. Periodic monitoring shall consist of records indicating the hours of operation of the diesel and the amount of diesel fuel fired. The fuel records consisting of hours of operation, amount of fuel used, fuel purchase dates, amount of fuel purchased and sulfur content shall be kept on a monthly and a 12-month rolling basis.

E. Drying Kilns

Robbins Lumber makes use of 10 drying kilns to dry their lumber before sale. Two kilns, Kilns #1 and #2, are relatively new and have individual volumes of 150,000 BF of lumber each. Seven kilns have individual volumes of 50,000 BF of lumber each. The last kiln, designated Kiln #6, has a volume of 25,000 BF of lumber giving the facility a total kiln volume of 675,000 BF of lumber. In terms of defining kiln volume, one board foot is equal to a 1-foot by 1-foot by 1-inch. Robbins Lumber processes approximately 25 MMBF of exclusively white pine per year.

The drying of softwood contributes to the facility's VOC emissions. From current information, white pine produces the greatest amount of VOC per BF of all the species of wood found in the northeast. Robbins Lumber proposes to be licensed to dry 40 MMBF per year of white pine or other wood species. Using a factor of 2.26 lb of VOC released in the kiln drying process for every 1,000 BF of white pine dried, Robbins Lumber will emit 45.2 tons of VOC per year.

#### Periodic Monitoring

Periodic monitoring for the kiln operation shall consist of maintaining records indicating the quantity of wood dried in boardfeet. The kiln records shall be kept on a monthly and a 12-month rolling basis.

#### F. Spray Booth

Robbins Lumber plans to install a spray booth to apply a primer coat to finished wood products for their value-added division. The spray booth is manufactured by J.B.I. and is 8 feet wide by 7 feet high by 6 feet deep. The spray booth makes use of a 7000 CFM and polyester exhaust filters that are designed exclusively to collect paint residue.

The spray head in the pneumatic spray system is capable of delivering 1 pint (0.125 gallons) of coating per hour. Projected annual primer use is approximately 325 gallons per year. The spray booth will make use of primer with a VOC content of approximately 3.11 pounds of VOC per gallon. Robbins Lumber proposes to limit primer use to no greater than 500 gallons per year. Based on the 500-gallon limit, VOC emission from the spray booth process will be approximately 1,575 lb/yr (0.8 tons/yr).

Best Available Control Technology (BACT) for the spray booth operation shall be a limit of 500 gallons of primer per year based on a twelve-month rolling total. BACT for the spray booth shall also be to operate the spray booth blower while any painting or staining of material is in progress. BACT shall also be to maintain the spray booth in good working order. Proper maintenance of the spray booth shall include frequent inspection of the blower equipment and the spray booth filters. The spray booth filters shall be maintained in good working order and any coating material spilled or excess coating material shall be cleaned up immediately.

#### Periodic Monitoring

1. Robbins Lumber shall record monthly usage of coating used in the spraying process and the percent by weight VOC and HAP content of the coating. The records shall be kept on a 12-month rolling total basis as well as monthly.

2. Robbins Lumber shall keep a record in regards to spray booth maintenance, booth failures and corrective action.

G. Cyclones

Robbins Lumber utilizes a number of process cyclones throughout the facility for handling particulate matter (PM) and particulate matter with a diameter of ten (10) microns or less (PM<sub>10</sub>) that is generated by the wood processing equipment. Blowers convey the particulate from the process equipment, which includes saws, planers and wood conveying belts, to the cyclones. These cyclones include the following:

The Sawmill Resaw cyclone handles particulate matter emissions from the sawmill and discharges them to waste for resale or for use as boiler fuel. The Shaving Silo Cyclone (AKA Planer Mill #2 Cyclone) handles particulate emissions from the Planer Mill #2 and discharges to the Main Silo #1 via the Main Silo #1 Cyclone. The Cut-up Shop (AKA the Value-Added Shop) also discharges to the Main Silo #1 via the Main Silo #1 Cyclone. The Main Silo feeds shavings to the Bagger #1 via the Bagger #1 Cyclone where the shavings are bagged for resale. The Planer Mill #3 Cyclone handles particulate emissions from the Planer Mill #3 and discharges to the Main Silo #2 via the Main Silo #2 Cyclone. The Main Silo #2 feeds shavings to the Bagger #2 via the Bagger #2 Cyclone where the shavings are bagged for resale. All cyclones vent to atmosphere.

Visible emissions from each cyclone shall not exceed an opacity of 10% on a 6-minute block average basis.

Periodic Monitoring

1. Robbins Lumber shall maintain a log of the condition of the cyclones and silos. Robbins Lumber shall inspect operations of the cyclones and the silos once per month and record findings.

Based on the type of control and operating in a manner consistent with good air pollution control practices, it is unlikely that the planer mill and sawmill will exceed the opacity limits; therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither EPA nor the state is precluded from performing its own testing and may take enforcement action for any violation discovered.

H. Biocide Dipping Unit

Robbins Lumber utilizes a biocide dipping process to treat lumber that will be held over in storage for a period of time before it is processed. Robbins Lumber uses the biocide to prevent fungal growth in the lumber, which will deteriorate the lumber and/or leave unsightly staining on the surface of the lumber. The biocide, BUSAN 1118, is combustible and toxic if inhaled.

Robbins Lumber utilizes a 4,200-gallon dip tank to dip tiers of lumber to coat the lumber with the biocide. Robbins Lumber utilizes a 5,000-gallon storage tank to store biocide over winter to prevent the biocide from freezing. Robbins Lumber typically uses approximately 100 to 200 gallons of biocide per year.

BUSAN 1118 has a VOC and HAP content of 31%. The volatile constituent is not the fungicide, which is a crystal, but an alcohol ester that is used as a vehicle for the fungicide. The BUSAN 1118 crystal solution is mixed with water at a 1 gallon BUSAN: 100 gallons of water ratio.

For the purposes of this license we will assume that the alcohol ester is 100% volatile. We will also assume a liberal usage figure of 700 gallons per year of biocide. The mixture weighs approximately 8 pounds per gallon. 700 gallons at 8 pounds per gallon gives a 5600-pound of biocide per year usage. 31% of this mixture is VOC; giving an annual emission of 1,736 pounds of VOC. BACT for the biocide dipping process at this time shall be a VOC emission limit of 0.9 ton of VOC per year on a twelve month rolling total basis.

Periodic Monitoring

Periodic monitoring for the biocide dipping process shall consist of monthly record keeping indicating the monthly usage of biocide and the percent by weight VOC and HAP content of the biocide. The records shall be kept on a 12-month rolling total basis as well as monthly.

I. Parts Washer

Robbins Lumber makes use of a parts washer in their maintenance shop. The parts washer is a 15-gallon unit and uses Voltz2 solvent, made by Chemsearch. The solvent is a citrus-based degreaser. Robbins Lumber uses between 20 and 30 gallons of the solvent per year.

1. In accordance with Chapter 130 section 3A of the Department regulations, Robbins Lumber shall equip the degreasing unit with the following:



- A. Equip the degreaser with a cover that can be operated with one hand if vapor pressure >15 mmHG at 100°F
- B. Affix a permanent conspicuous label summarizing the following operating standards:
- Close cover when not in use,
  - Drain cleaned parts for at least 15 seconds or until dripping ceases,
  - If applicable, solvent spray must be a solid fluid stream and shall not exceed a pressure of 10 pounds per square inch gauge (psig),
  - Do not degrease porous or absorbent materials,
  - Do not operate degreaser if draft is greater than 131.2 feet per minute (ft/min) as measured between 3.28 and 6.56 feet upwind and at the same elevation as the tank lip), and
  - Do not operate degreaser upon occurrence of any visible leak until such leak is repaired
- [MEDEP Chapter 130]
2. In accordance with Chapter 130, Section 3A of the Department regulations, Robbins Lumber shall follow operational standards when making use of the parts degreaser. [MEDEP Chapter 130]

Periodic Monitoring

A record shall be maintained of solvent purchases. The record shall consist of purchase receipts indicating date of purchase and volume of solvent purchased.

J. Ink Labeling Process

Robbins Lumber utilizes a labeling process in which ink is imprinted on the board ends for inventory purposes. The ink labeling process makes use of an ink jet printer that prints bar codes on the board ends. The unit uses approximately 10 – 15 gallons of ink per year. Robbins Lumber also makes use of another inking process in which board ends are coated with an ink that disappears over time. This ink is called Houdini ink and the facility uses approximately 10 – 15 gallons per year. The ink labeling process uses less than 50-gallons of coating, therefore, it is considered an insignificant activity and emissions from the process are not considered in determining facility emissions limits.

Periodic Monitoring

In order to demonstrate that this process remains an insignificant activity, Robbins Lumber shall maintain ink purchase records. The records shall include purchase receipts indicating date of ink purchase and volume of ink purchased. The record shall also include the percent by weight VOC and HAP content of the ink used in the Ink Labeling Process. The records shall be kept on a 12-month rolling total.

K. Facility Emissions

Facility emissions were calculated based on an annual fuel limit of 48,000 tons of wet wood at 50% moisture per year and 163,795 gallons of diesel fuel with a 0.05% sulfur content. Emissions from Robbins Lumber, Inc. shall not exceed the following:

**Total Annual Emissions for the Facility**  
(used to calculate the license fee)

<b>Pollutant</b>	<b>Tons/Year</b>
PM	44.5
PM <sub>10</sub>	44.5
SO <sub>2</sub>	2.6
NO <sub>x</sub>	86.5
CO	170.8
VOC <sup>(1)</sup>	69.5
Total HAPs <sup>(2)</sup>	24.9
Individual HAPs <sup>(2)</sup>	9.9

(1) VOC emissions are broken down in the following manner:

45.2 tons/yr from kiln drying, 22.6 tons/yr from fuel burning equipment, 0.9 ton per year from Biocide Dipping process and 0.8 tons/yr from the spray booth process.

(2) HAPs are identified by the EPA in regulations pursuant to Section 112(b) of the Clean Air Act (CAA).

**III. 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. The results of this analysis were reflected in Air Emission License Amendment #7 issued under Chapter 115 on June 14, 2001. An additional ambient air quality analysis is not required for this Initial Part 70 License.

**ORDER**

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

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- 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-A-I, subject to the following conditions:

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to **Robbins Lumber, Inc.** pursuant to the Department's preconstruction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP 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 Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

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

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

- (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;
- (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.
- (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 effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated October 28, 1998.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
a.	Boilers #1 and #2	40 CFR Part 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Commenced construction prior to June 9, 1989
b.	Boilers #1 and #2	Chapter 138	NO <sub>x</sub> RACT	Facility is limited to less than 99.9 tons NO <sub>x</sub> /year
c.	Drying Kilns	Chapter 134	NO <sub>x</sub> RACT	Kiln Drying activities are exempt from NO <sub>x</sub> RACT regulation

(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 Chapter 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.

(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.

**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 (Title 38 MRSA §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;

- (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;

**Enforceable by State-only**

- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.

- (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;

**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;

- (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.

- (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:

- (i) 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;

- (ii) to demonstrate compliance with the applicable emission standards; or

- (iii) 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.

**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. **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 in emission standards 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 MRSA § 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.
- (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.
- (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.
- (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;



**SPECIAL CONDITIONS**

(14) Boilers #1 and #2

- A. Robbins Lumber shall not exceed an annual fuel limit of 48,000 tons of wet wood at 50% moisture per year in their boilers based on a twelve month rolling total. Robbins Lumber shall maintain a log documenting monthly fuel use and annual fuel use based on a twelve month rolling total. Compliance shall be demonstrated by fuel quantity records of fuel delivered to the fuel storage building. [MEDEP Chapter 140, BPT]
- B. Robbins Lumber may utilize Boiler #2 to burn up to 200 gallons per month (2400 gallons per year based on a twelve month rolling total) of specification waste oil. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
- C. Only specification waste oil generated by Robbins Lumber (from Robbins Lumber owned trucks and other Robbins Lumber owned operating motorized equipment) shall be burned in Boiler #2. Upon the Department's request, Robbins Lumber shall test additional representation samples of the waste oil. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
- D. Records documenting the amount of waste oil burned shall be maintained on a monthly and 12-month rolling total. [MEDEP Chapter 140, BPT] **Enforceable by State-only**
- E. Emissions from Boilers #1 and #2 shall be limited to the following:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	0.2	MEDEP Chapter 140, BPT	Federally enforceable through Title V permit
NO <sub>x</sub>	0.3	MEDEP Chapter 140, BPT	State only

**Boiler #1 lb/hr limits**

<u>Pollutant</u>	<u>lb/hr</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	4.3	MEDEP Chapter 140, BPT	State only
PM <sub>10</sub>	4.3	MEDEP Chapter 140, BPT	State only
SO <sub>2</sub>	0.2	MEDEP Chapter 140, BPT	State only
NO <sub>x</sub>	6.5	MEDEP Chapter 140, BPT	State only
CO	7.1	MEDEP Chapter 140, BPT	State only
VOC	2.1	MEDEP Chapter 140, BPT	State only

**Boiler #2 lb/hr limits**

<b>Pollutant</b>	<b>lb/hr</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	9.9	MEDEP Chapter 140, BPT	State only
PM <sub>10</sub>	9.9	MEDEP Chapter 140, BPT	State only
SO <sub>2</sub>	0.4	MEDEP Chapter 140, BPT	State only
NO <sub>x</sub>	44.9	MEDEP Chapter 140, BPT	State only
CO	36.8	MEDEP Chapter 140, BPT	State only
VOC	4.9	MEDEP Chapter 140, BPT	State only

- F. Robbins Lumber shall operate the boilers such that the visible emissions from either boiler does not exceed 30% opacity on a six (6) minute block average basis, for more than (2) two (6) six-minute block averages in a 3-hour period. [MEDEP Chapter 140, BPT]
- G. Robbins Lumber shall maintain records of annual wood fuel use indicating the quantity of fuel consumed. [MEDEP Chapter 140, BPT]
- (15) Diesel Generator
- A. Robbins Lumber shall equip, operate and maintain an operating time meter on the diesel generator.
- B. Robbins Lumber shall be limited to 1200 hours of operation per year based on a 12 month rolling total.
- C. Robbins Lumber shall fire diesel fuel with a sulfur content not to exceed 0.05% sulfur by weight.
- D. Emissions from the diesel generator shall be limited to the following:

<b>Pollutant</b>	<b>lb/MMBtu</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	0.12	MEDEP Chapter 140, BPT	Federally enforceable through Title V permit

**Diesel Generator**

<b>Pollutant</b>	<b>lb/hr</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	2.2	MEDEP Chapter 140, BPT	State only
PM <sub>10</sub>	2.2	MEDEP Chapter 140, BPT	State only
SO <sub>2</sub>	1.0	MEDEP Chapter 140, BPT	State only
NO <sub>x</sub>	35.5	MEDEP Chapter 140, BPT	State only
CO	15.9	MEDEP Chapter 140, BPT	State only
VOC	1.7	MEDEP Chapter 140, BPT	State only

- E. Visible emissions from the diesel generator unit shall not exceed 20% opacity on a 6-minute block average, except for no more than 2 six-minute block averages in a 3-hour period.
- F. Robbins Lumber shall maintain records indicating the amount of diesel fuel fired on a monthly and a twelve-month rolling total basis. The fuel records shall consist of fuel purchase dates, amount of fuel purchased and sulfur content.

(16) Drying Kilns

- A. Robbins Lumber shall not process more than a total of 40 MMBF per year of lumber in their kilns based on a twelve month rolling total. [MEDEP Chapter 140, BPT]
- B. Robbins Lumber shall maintain a kiln log that shall include quantities of wood dried in board feet. The record shall be kept on a monthly and twelve-month rolling total basis. [MEDEP Chapter 140, BPT]

(17) General Process

Visible emissions from any general process source, including the wood waste conveying system (blowers) and the dust cyclones shall not exceed an opacity of 10% on a 6-minute block average basis. [MEDEP Chapter 140, BPT]

(18) Spray Booth

- A. Robbins Lumber shall be limited to an annual primer usage of 500 gallons per year of primer based on a twelve-month rolling total. [MEDEP Chapter 140, BPT]
- B. Robbins Lumber shall operate the spray booth exhaust fan during all periods of sprayer operation. [MEDEP Chapter 140, BPT]

- C. Robbins Lumber shall maintain the spray booth in good working order. Proper maintenance of the spray booth shall include frequent inspection of the blower equipment and the spray booth filters. The spray booth filters shall be maintained in good working order and any coating material spilled or excess coating material shall be cleaned up immediately. [MEDEP Chapter 140, BPT]
- D. Robbins Lumber shall keep monthly records of VOC emissions generated from the spray booth, which will include monthly primer usage and the VOC content of the primer. VOC emissions records for the spray booth shall be included in the record of the total annual facility VOC emissions. [MEDEP Chapter 140, BPT]
- F. HAPs generated from the spray booth operation shall be documented by monthly record keeping indicating the monthly usage of primer and the HAP content of the primer. HAP emissions records for the spray booth operation shall be included in the record of the total annual facility HAP emissions. [MEDEP Chapter 140, BPT]

(19) Biocide Dipping Operation

- A. Robbins Lumber shall not exceed VOC emissions of 0.9 tons/yr from the Biocide Dipping Operation based on a twelve month rolling total. [MEDEP Chapter 140, BPT]
- B. Robbins Lumber shall keep monthly records of VOC emissions generated from the biocide dip tank, which will include monthly biocide usage and the VOC content of the biocide. VOC emissions records for the Biocide Dipping Operation shall be included in the record of the total annual facility VOC emissions. [MEDEP Chapter 140, BPT]
- C. HAPs generated from the Biocide Dipping Operation shall be documented by monthly record keeping indicating the monthly usage of biocide and the HAP content of the biocide. HAP emissions records for the Biocide Dipping Operation shall be included in the record of the total annual facility HAP emissions. [MEDEP Chapter 140, BPT]

(20) Ink Labeling Process

In order to demonstrate that this process remains an insignificant activity, Robbins Lumber shall maintain ink purchase records. The records shall include purchase receipts indicating date of ink purchase and the volume of ink purchased. The record shall also include the percent by weight VOC and HAP content of the ink purchased. The record shall be maintained on a twelve-month rolling total basis. [MEDEP Chapter 140, BACT]

(21) Parts Degreaser

1. Robbins Lumber shall equip the degreasing unit with the following:

- A. Equip the degreaser with a cover that can be operated with one hand if vapor pressure >15 mmHG at 100°F
- B. Affix a permanent conspicuous label summarizing the following operating standards:
  - Close cover when not in use,
  - Drain cleaned parts for at least 15 seconds or until dripping ceases,
  - If applicable, solvent spray must be a solid fluid stream and shall not exceed a pressure of 10 pounds per square inch gauge (psig),
  - Do not degrease porous or absorbent materials,
  - Do not operate degreaser if draft is greater than 131.2 feet per minute (ft/min) as measured between 3.28 and 6.56 feet upwind and at the same elevation as the tank lip), and
  - Do not operate degreaser upon occurrence of any visible leak until such leak is repaired

[MEDEP Chapter 130]

2. Robbins Lumber shall follow operational standards when operating the parts degreaser. [MEDEP Chapter 130]
3. Records shall be maintained in regards to solvent purchased by Robbins Lumber for use in the parts degreaser, which would include purchase receipts indicating the dates of purchase and the volume of solvent purchased. [MEDEP Chapter 130]
4. Handling, storage and disposal of solvent shall be done in accordance to Chapter 130 Section 4 of the Departments regulations. [MEDEP Chapter 130]

(22) Record Keeping Requirements

A. Periodic Monitoring

The following is a list of the periodic monitoring required by this license:

1. Robbins Lumber shall maintain a record of wood usage fired in Boilers #1 and #2 based on a twelve-month rolling total.
2. Robbins Lumber shall maintain a record of waste oil fired in Boilers #1 and #2 based on a twelve-month rolling total.
3. Robbins Lumber shall maintain a record of use of the Diesel Generator. The record shall include hours of operation and fuel use based on a twelve-month rolling total.
4. Robbins Lumber shall maintain a record of kiln production based monthly and on a twelve-month rolling total.
5. Robbins Lumber shall maintain a record of spray booth paint usage based on a twelve-month rolling total and monthly total and spray booth inspection and maintenance.
6. Robbins Lumber shall maintain a record of maintenance, inspection and repair of the facility's cyclones.
7. Robbins Lumber shall maintain a record of biocide usage including VOC and HAP content.
8. Robbins Lumber shall maintain a record of parts degreaser solvent purchases, which shall include receipts indicating solvent purchase dates and volume of solvent purchased.
9. Robbins Lumber shall maintain a record of labeling ink purchases, which shall include percent VOC and HAP content and receipts indicating purchase dates and volume of ink purchased.
10. Robbins Lumber shall maintain a record of VOC and HAP emissions, which shall include emissions from fuel burning equipment, the drying kiln operation, the stain dipping operation, the spray booth operation and the biocide dipping operation

(23) Robbins Lumber shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (Title 38 MRSA §605-C).

(24) Semiannual Reporting

The licensee shall submit semiannual reports to the Bureau of Air Quality. The initial semiannual report is due July 30, 2003. Subsequent reports shall be due on January 30 and July 30 of each year.

A. Each semiannual report shall include a summary of the periodic monitoring required by this license.

B. 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.

[MEDEP Chapter 140]

(25) Annual Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department;  
Or
- 2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator  
Maine DEP  
Bureau of Air Quality  
17 State House Station  
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted by September 1.

(26) Annual Compliance Certification

The licensee shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The initial annual compliance certification is due January 30, 2004 and subsequent annual compliance certifications shall be due January 30 of each year. [MEDEP Chapter 140]

(27) The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. Section 3 §585-B, sub-§5	Reduce Mercury Use and Emissions	Enforceable by State-only

(28) The licensee is subject to all applicable requirements of 40 CFR Part 68 (Risk Management Plan).

(29) 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. An example of such units include refrigerators and any size air conditioner that contain CFCs.  
[40 CFR, Part 82, Subpart F]

(30) Certification by a Responsible Official

All reports (including quarterly reports, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

(31) Robbins Lumber shall pay the annual air emission license fee within 30 days of April 30 of each year. Pursuant to 38 MRSA 353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for the revocation of the license under 38 MRSA 341-D, Subsection 3.



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

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

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

DONE AND DATED IN AUGUSTA, MAINE THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 2002.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: **March 24, 1998 (phase I of application)**

Date of application acceptance: **March 24, 1998 (phase I of application)**

Date filed with the Board of Environmental Protection \_\_\_\_\_

This Order prepared by Peter G. Carleton, Bureau of Air Quality.