STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

DEPARTMENT ORDER

Irving Forest Products, Inc. **Oxford County** **Dixfield, Maine** **A-409-70-H-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 (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Irving Forest Products, Inc.
LICENSE TYPE	Part 70 License Renewal
NAICS CODES	321113, 321912, 321999
NATURE OF BUSINESS	Lumber Manufacturer
FACILITY LOCATION	24 Hall Hill Road, Dixfield, Maine

Irving Forest Products, Inc. (IFP) is a manufacturer of kiln-dried pine lumber. The facility consists of a sawmill, a planer mill, drying kilns, three boilers, fuel storage, and a maintenance garage.

IFP has the potential to emit more than 100 tons per year (tpy) of particulate matter (PM), particulate matter under 10 micrometers (PM_{10}), particulate matter under 2.5 micrometers ($PM_{2.5}$), nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC); therefore, the source is classified as a major source for criteria pollutants.

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

B. Emission Equipment

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

Boilers

Equipment	Maximum Heat Input Capacity	Max. Firing Rate	Fuel Type	Mfr. Date	Install. Date	Stack #
Boiler #1	20.6 MMBtu/hr	2.3 ton/hr	Biomass [A]	1959	1959	1
Boiler #2	20.6 MMBtu/hr	2.3 ton/hr	Biomass [A]	1960	1960	1
Boiler #4	49.3 MMBtu/hr	5.5 ton/hr	Biomass [A]	Pre-1984	1994	3

[A] Moisture content is approximately 50% by weight

Generators

Equipment	Maximum Heat Input Capacity	Max. Firing Rate	Fuel Type	Mfr. Date	Install. Date
Fire Pump #1	2.0 MMBtu/hr	14.6 gal/hr	Distillate Fuel	1997	1997
Generator #1	1.2 MMBtu/hr	8.8 gal/hr	Distillate Fuel	1999	2009

Process Equipment

Equipment	Capacity
Drying Kilns (1-11)	190,000 board feet per cycle per kiln
Cyclone #1A (Value Added Shavings)	6,000 tpy
Cyclone #2A and #2B (Planer Mill Shavings)	25,000 tpy
Cyclone #3A (Shavings Silo Cyclone)	25,000 tpy
Cyclone #4A (Shavings Truck Bin Cyclone)	25,000 tpy
Cyclone #5 (Planer Mill Hog and VA Mill Truck Bin)	13,000 tpy
Cyclone #6 (Boiler #1-#2 Fuel Silos Cyclone)	1,000 tpy
Cyclone #7 (Boiler #1-#2 Fuel Input Cyclone)	14,000 tpy

An additional cyclone, Cyclone #6A, above and central to Tek Tanks, is also onsite. This unit has been out of service since before 1999 and is not addressed further in this license.

IFP operates an aqueous-based parts washer. Since the cleaning solution contains less than 5% VOC, it does not meet the definition of solvent cleaning machine, and there are no applicable requirements in *Solvent Cleaners,* 06-096 C.M.R. ch. 130. Therefore, it is considered an insignificant activity and mentioned for completeness purposes only.

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

C. Acronyms and Units of Measure

ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BPT	Best Practical Treatment
C.F.R.	Code of Federal Regulations
C.M.R.	Code of Maine Rules
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emissions Monitoring System
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
COMS	Continuous Opacity Monitoring System
EPA or US EPA	United States Environmental Protection Agency
gal/hr	gallon per hour
HAP	Hazardous Air Pollutants
lb	pound
lb/hr	pounds per hour
lb/MMBtu	pounds per million British thermal units
lb/ton	pounds per ton
M.R.S.	Maine Revised Statutes
MMBtu	million British thermal units
MMBtu/hr	million British thermal units per hour
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
O_2	oxygen
PM	particulate matter less than 100 microns in diameter
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
ppmdv	parts per million on a dry volume basis
RACT	Reasonably Available Control Technology
RICE	reciprocating internal combustion engine
SO_2	sulfur dioxide
ton/hr	ton per hour
tpy	ton per year
VOC	volatile organic compounds

D. Definitions

Biomass means any biomass-based solid fuel that is not a solid waste. This includes, but is not limited to, wood residue and wood products (*e.g.,* trees, tree stumps, tree limbs, bark, lumber, sawdust, sander dust, chips, scraps, slabs, millings, and shavings). This definition also includes wood chips and processed pellets made from wood or other forest residues. Inclusion in this definition does not constitute a determination that the material is not considered a solid waste. IFP should consult with the Department before adding any new biomass type to its fuel mix.

Continuously. With respect to the operation of parameter monitors required by this license, *continuously* means providing equally spaced data points with at least one valid data point in each successive 15-minute period. A minimum of three valid 15-minute periods constitutes a valid hour.

Distillate Fuel means the following:

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

Malfunction means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

An engine is not a non-road (portable) engine if it remains or will remain at a location for more than 12 consecutive months or for a shorter period of time if sited at a seasonal source. A seasonal source is a source that remains in a single location for two years or more and which operates for fewer than 12 months in a calendar year. If an engine operates at a

seasonal source for one entire season, the engine does not meet the criteria of a non-road (portable) engine and is subject to applicable stationary engine requirements.

Records or *Logs* mean either hardcopy or electronic records.

E. Application Classification

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

The application for IFP is for the renewal of their existing Part 70 Air Emission License. This license does not include any amendments or the incorporation of terms and conditions of any New Source Review (NSR) licenses issued to IFP pursuant to *Major and Minor Source Air Emission License* Regulations, 06-096 Code of Maine Rules (C.M.R.) ch.115. This license is a Part 70 License renewal issued pursuant to C.M.R. ch. 140.

F. Facility Description

IFP is a manufacturer of kiln-dried pine lumber. The main mill includes a sawmill, a planer mill, 11 kilns, three boilers, fuel storage, and a maintenance garage.

Logs are delivered by truck to the mill and placed in inventory. They are sprayed with water to prevent damage by aerobic organisms. The logs are transferred from inventory into the mill by a portal crane. The crane feeds the logs to two decks, each feeding one of the two ring debarkers. All the bark is collected by mechanical conveyors and fed into a truck-loading bin to eventually be hauled offsite to customers. The logs then pass through a metal detector, followed by a laser scanner which measures each log to determine the optimal cutting pattern.

The sawmill consists of two log breakdown lines. The first line is the head-rig line, which consists of a double-cut vertical bandsaw and a twin horizontal bandsaw. The second line is the quad line, which consists of two chipper heads, four vertical bandsaws, and a 12-inch double arbor gang circular saw. There are two saw edgers that are fed from these two lines.

Lumber is fed to a single 16-foot trim saw line feeding into a length and width sorter which feeds into a sticker stacker. Lumber is then transferred by forklift into storage to await kiln drying.

Waste from these machines is chipped and conveyed, along with chips from the chipping heads, to a truck bin to eventually be loaded into trucks and delivered offsite to customers.

There are two waste system chippers on the first floor of the sawmill with cyclones and screens inside the building. Sawdust is captured by the cyclones and conveyed to a truck

bin where eventually loaded onto trucks for either transfer on-site to the biomass-fired boilers or delivery offsite to customers.

The lumber is stored in a covered storage area. Fans blow on the wood in the storage area to keep it cool and to prevent fungal growth that causes staining. The boards produced at IFP are kiln dried in the 11 kilns located at the mill. The kilns are track kilns each having the capacity to process 190,000 board feet (BF) per cycle. Each cycle is approximately six days. The wood is heated to approximately 146 °F and dried to approximately 12.6% moisture by weight. Moisture from the kilns is exhausted through multiple vents to the atmosphere.

After being dried, the wood is transferred by forklift to the planer mill. Rough, dry lumber is fed through a planer machine to create finished lumber. Finished lumber is conveyed to a grading station where it is graded. After grading, trim saws are used to trim for grade and length. The lumber is then sorted and stacked according to grade and length.

The planer shavings and trimmer sawdust are pneumatically conveyed to the planer mill shavings cyclone. The planer mill shavings cyclone drops the shavings into a blowpipe that blows the dust to the bagger silo cyclone and into the bagger silo. Shavings from the bagger silo are blown from the silo to the shavings hopper cyclone where the dust is dropped into the bagger for loading onto trucks and sold offsite.

Wood from the trimmers in the planner mill is mechanically conveyed to a dry hog. The hogged wood is pneumatically blown to a truck-loading bin where it is loaded into trucks and transported to hoppers for use as fuel for the facility's three boilers or delivered offsite to customers.

Wood waste and chips to be burned in the boilers are delivered by truck and dumped into hoppers. The facility also purchases chipped wood pallets for use as boiler fuel. The pallets are considered traditional biomass fuel provided the pallets are not coated, painted, or treated in any way. A series of conveyors, augers, and bucket-elevators deliver the wood fuel into the wood-fired boilers. One cyclone is used in conjuncture with Boilers #1 and #2 where sawdust is blown into a hopper before it is fed into the boiler.

IFP makes use of three biomass-fired boilers designated Boilers #1, #2, and #4. These boilers are used to provide heat for the kilns as well as space heat for buildings.

G. General Facility Requirements

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

Citation	Requirement Title
06-096 C.M.R. ch. 101	Visible Emissions Regulation
06-096 C.M.R. ch. 102	Open Burning
06-096 C.M.R. ch. 103	Fuel Burning Equipment Particulate Emission Standard
06-096 C.M.R. ch. 105	General Process Source Particulate Emission Standard
06-096 C.M.R. ch. 106	Low Sulfur Fuel Regulation
06-096 C.M.R. ch. 109	Emergency Episode Regulations
06-096 C.M.R. ch. 110	Ambient Air Quality Standards
06-096 C.M.R. ch. 116	Prohibited Dispersion Techniques
06-096 C.M.R. ch. 137	Emission Statements
06-096 C.M.R. ch. 138	Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides
06-096 C.M.R. ch. 140	Part 70 Air Emission License Regulations
06-096 C.M.R. ch. 143	New Source Performance Standards
06-096 C.M.R. ch. 144	National Emission Standards for Hazardous Air Pollutants
40 C.F.R. Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 C.F.R. Part 63, Subpart ZZZZ	National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 70	State Operating Permit Programs

II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

A. Introduction

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

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

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

B. NOx RACT (Reasonably Available Control Technology)

Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides, 06-096 C.M.R. ch. 138 (NO_x RACT) is applicable to sources that have the potential to emit quantities of NO_X equal to or greater than 100 tons/year. Generator #1 and Fire Pump #1 are both emergency stationary RICE, as defined by 40 C.F.R. Part 63, Subpart ZZZZ and are therefore exempt from the requirements of NOx RACT pursuant to Section 1(B)(2) of the rule. Boilers #1, #2, and #4 are each considered "small boilers" as defined by the rule. Small boilers are required to conduct annual tune-ups and comply with the following tune-up recordkeeping requirements:

1. Boiler Tune-up Specifications
   a. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly.
   b. 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.

2. Recordkeeping Requirements
   a. A tune-up procedure file must be kept on-site and made available to the Department upon request.
   b. An oxygen/carbon monoxide curve or an oxygen/smoke curve must be kept on file.
   c. Once the optimum excess oxygen setting has been determined, IFP must periodically verify that the setting remains at that value.
   d. If the oxygen level found is substantially higher than the value provided by the combustion unit manufacturer, IFP must improve the fuel and air mixing, thereby allowing operation with less air.

Although NO_x RACT requires annual tune-ups on these boilers and 40 C.F.R. Part 63, Subpart JJJJJJ (Subpart JJJJJJ) requires tune-ups every five years, a tune-up conducted to comply with Subpart JJJJJJ shall satisfy this tune-up requirement for the year that the Subpart JJJJJJ tune-up is conducted provided it complies with the above specifications and requirements.

Revisions to 06-096 C.M.R. ch. 138 went into effect May 7, 2025. These changes included the establishment of new standards for emission units located within the 2022 Ozone Transport Region, as defined in that chapter. IFP is not located within the 2022 Ozone Transport Region and is therefore not subject to the revised NO_x RACT standards in section 4 of the rule. IFP continues to be subject to standards in section 3 of 06-096 C.M.R. ch. 138.

C. VOC RACT (Reasonably Available Control Technology)

Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds, 06-096 C.M.R. ch. 134 (VOC RACT) is applicable to sources that have the

potential to emit quantities of VOC equal to or greater than 40 tons/year from non-exempt equipment.

The boilers, Fire Pump #1, and Generator #1 are exempt from VOC RACT pursuant to Section 1(C)(4) of the rule because their emissions of VOC are the product of incomplete combustion. The drying kilns are also exempted from VOC RACT pursuant to Section 1(C)(6). Therefore, there is no VOC emitting equipment at IFP subject to the requirements of 06-096 C.M.R. ch. 134.

D. Compliance Assurance Monitoring (CAM)

Compliance Assurance Monitoring, 40 C.F.R. Part 64 is applicable to units at major sources if the unit has emission limits, a control device to meet the limits, and pre-control emissions greater than 100% of the major source threshold.

This regulation's 40 C.F.R. § 64.2(b)(1)(vi) specifies the exemption from specific CAM requirements for any emission unit subject to emission limitations or standards for which a Part 70 air emission license specifies a continuous compliance determination method. Furthermore, 40 C.F.R. § 64.2(b)(1)(i) specifies the exemption from specific CAM requirements for any emission unit subject to emission limitations or standards in a NSPS or NESHAP regulation proposed by the Administrator after November 15, 1990. [40 C.F.R. Part 64 § 64.2(b)]

The following table lists all the specific pollutants for each unit meeting CAM applicability criteria and the determination of the applicability of CAM requirements for each.

40 C.F.R. Part 64 Applicability Table

Unit	Pollutant	CAM Required	Reason	Regulatory Authority
Boiler #1	Criteria	No	Pre-control emissions are less than 100 tpy	40 C.F.R. § 64.2(a)(3)
Boiler #2	Criteria	No	Pre-control emissions are less than 100 tpy	40 C.F.R. § 64.2(a)(3)
Boiler #4	PM/PM_{10}	No	Pre-control emissions are less than 100 tpy	40 C.F.R. § 64.2(a)(3)
Boiler #4	NO_x	No	Emissions are greater than 100 tpy, but no control device is used.	40 C.F.R. § 64.2(a)(2)
Boiler #4	CO	No	Emissions are greater than 100 tpy, but no control device is used.	40 C.F.R. § 64.2(a)(2)
Kilns	VOC	No	Emissions are greater than 100 tpy, but no control device is used.	40 C.F.R. § 64.2(a)(2)

Therefore, there are no units at this facility subject to CAM requirements.

E. Fuel Sulfur Content Requirements

IFP is licensed to fire distillate fuel. With limited exceptions, no person shall import, distribute, or offer for sale any distillate fuel with a sulfur content greater than 0.0015% by weight (15 ppm) pursuant to 38 M.R.S. § 603-A(2)(A)(3). Therefore, the distillate fuel purchased or otherwise obtained for use at this facility shall not exceed 0.0015% by weight (15 ppm).

F. Boilers #1 and #2

Boilers #1 and #2 (the Dillon Boilers) are biomass-fired boilers with maximum design heat input capacity of 20.6 MMBtu/hr each. The average moisture content of the biomass fired in Boilers #1 and #2 is approximately 50% by weight. Both boilers exhaust to a common stack, Stack #1, which has an inside diameter of four feet and a height of 100 feet above ground level (AGL). Boilers #1 and #2 were manufactured in 1959 and 1960, respectively.

Boilers #1 and #2 also fire chipped wood pallets. *Solid Wastes Used as Fuels or Ingredients in Combustion Units*, 40 C.F.R. Part 241, includes untreated wood pallets in the definition of "clean cellulosic biomass." This regulation's definition of "traditional fuels" includes clean cellulosic biomass. Therefore, untreated wood pallets are considered a traditional fuel and not a solid waste under Part 241. The pallets burned in Boilers #1 and #2 are not to be coated, painted, or treated in any way, and all fasteners must be removed prior to combustion. Failure to remove fasteners from the pallets may make use of this fuel subject to *Solid Waste Management Rules: Beneficial use of Solid Wastes*, 06-096 C.M.R. ch. 418.

IFP's NSR License A-409-77-3-M, issued 10/02/2018, determined the following fuel use limit as BACT for these two boilers: Boilers #1 and #2 shall each not exceed an annual fuel usage of 20,000 ton/year (12-month rolling total basis) of biomass at an assumed moisture of 50% by weight. IFP shall keep records of fuel usage in each boiler on a monthly and 12-month rolling total basis. This is their expected biomass-fired tonnage based on operating at 8,760 hours per year.

For the purposes of this license, startup and shutdown of Boilers #1 and #2 are defined as follows:

A *startup period* is defined as a period of time commencing when fuel is first fired in the boiler and ending when the combustion chamber temperature exceeds 1,600 °F. The total duration of this period shall not exceed four (4) hours.

A *shutdown period* is defined as a period of time commencing when fuel is no longer being fed into the boiler and ending when ash is no longer exiting the ash handling system. The total duration of this period shall not exceed four (4) hours.

1. New Source Performance Standards (NSPS)

   Boilers #1 and #2 underwent physical changes as described in Air Emission License A-409-74-D-R/A, issued 3/11/1993. The boilers were retrofit in two ways: by changing the fuel delivery method and by installing a multi-zone underfire air grate system. An infeed screw auger system replaced the air swept spreader stoker, and a 12-zone underfire air grate system was added to allow for increased control of where underfire air was introduced. Both of these changes were intended to reduce emissions of particulate matter. Since neither of these changes resulted in increased emissions, these changes were not considered a modification as defined by 40 C.F.R. Part 60.

   Therefore, due to the date of manufacture, 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 C.F.R. Part 60, Subpart Dc. These standards apply to steam generating units with a heat input capacity equal or greater than 10 MMBtu/hr up to and including 100 MMBtu/hr that are constructed, modified, or reconstructed after June 9, 1989.

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 C.F.R. Part 63, Subpart JJJJJJ. They are considered existing, biomass-fired boilers. Requirements for this subpart are addressed in Section II.H of this license.

   IFP is not a major source of HAP; therefore, Boilers #1 and #2 are not subject to *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters,* 40 C.F.R. Part 63, Subpart DDDDD.

3. Emission Limits and Streamlining

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

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.57 lb/MMBtu	06-096 C.M.R. ch. 103, § 2(A)(3)(a)	Streamlined to 0.30 lb/MMBtu *
PM	0.30 lb/MMBtu	A-409-77-3-M (10/02/2018), BACT	0.30 lb/MMBtu

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	6.17 lb/hr	A-409-77-3-M (10/02/2018), BACT	6.17 lb/hr
PM_{10}	6.17 lb/hr	A-409-77-3-M (10/02/2018), BACT	6.17 lb/hr
$PM_{2.5}$	6.17 lb/hr	06-096 C.M.R. ch. 140, BPT	6.17 lb/hr
SO_2	0.51 lb/hr	A-409-77-3-M (10/02/2018), BACT	0.51 lb/hr
NO_x	8.22 lb/hr	A-409-77-3-M (10/02/2018), BACT	8.22 lb/hr
CO	12.34 lb/hr	A-409-77-3-M (10/02/2018), BACT	12.34 lb/hr
VOC	0.35 lb/hr	A-409-77-3-M (10/02/2018), BACT	0.35 lb/hr

4. Visible Emissions

   a. 06-096 C.M.R. ch. 101

      (1) Boilers #1 and #2 are subject to the following visible emissions standard pursuant to 06-096 C.M.R. ch. 101, § (4)(A)(5)(a):

      Visible emissions from Boilers #1 and #2 shall each not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time IFP shall either meet the normal operating visible emissions standard or the following alternative visible emissions standard.

      During periods of startup, shutdown, or malfunction for either Boiler #1 or Boiler #2, visible emissions from Stack #1 shall not exceed 40% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive six-minute block averages) per event. If this alternative visible emissions standard is utilized, IFP shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.

      (2) Pursuant to 06-096 C.M.R. ch. 101, § (4)(D), visible emissions from two or more of any combination of sources subject to this Chapter that are operating concurrently and emitting through a common stack shall not exceed an opacity equivalent to the highest applicable standard for the individual units in operation and exhausting to the common stack. During periods when at least one unit is subject to an alternative limit due to startup, shutdown, or malfunction or is complying with an alternative work practice standard, the alternative emission standard or alternative work practice standard shall apply to the common stack. Therefore, emissions from Stack #1 are subject to the visible emissions standard and startup/shutdown,/malfunction alternative

standard as describes in section (1) above whether one of both of the units are in operation.

b. A-409-77-3-M (10/02/2018), BACT

Visible emissions from Stack #1 (Boilers #1 and #2) shall not exceed 30% opacity on a six (6) minute block average basis except for periods of startup, shutdown, and malfunction, during which time IFP may elect to demonstrate compliance by complying with all of the following work practice standards.

(1) IFP shall maintain a log (written or electronic) of the date, time, and duration of all operating time, startups, shutdowns, and malfunctions for each boiler (Boilers #1 and #2).

(2) IFP shall develop and implement a written startup and shutdown plan for Boilers #1 and #2.

(3) Boilers #1 and #2 shall be operated at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Department that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the unit.

c. Streamlining

The Department has determined that the 06-096 C.M.R. ch. 101 visible emissions standard is more stringent than the other applicable limits listed above. Therefore, the visible emission limit has been streamlined to the more stringent 06-096 C.M.R. ch. 101 limit.

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 by the Department.

6. Periodic Monitoring

IFP shall record data and maintain records for the following periodic monitoring values for Boilers #1 and #2 (each):

a. Hours of operation for Boilers #1 and #2 (each) on a monthly and calendar year basis. [06-096 C.M.R ch. 137]
b. Amount of biomass (tons) fired in each boiler on a monthly, 12-month rolling total, and calendar year total. Biomass fuel usage may be calculated from steam flow. [A-409-70-C-R (04/16/2008), BACT]
c. Percent oxygen (% O_2) monitored continuously and recorded at least once per four-hour period. [06-096 C.M.R. ch. 138 § (3)(J)(2)(c)]
d. Records of any maintenance activities performed (planned or unplanned) on each boiler. [A-409-70-F-R/A (11/05/2018), BACT]
e. Records of annual boiler tune-ups. [06-096 C.M.R. ch. 138 § (3)(J)(2)]
f. Records of the date, time, and duration of all startups, shutdowns, and malfunctions for each boiler. [A-409-77-3-M (10/02/2018), BACT]

7. Parameter Monitors

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

8. CEMS and COMS

There are no CEMS or COMS required for Boilers #1 and #2.

G. Boiler #4

Boiler #4 (also known as the IBC Boiler) is a biomass-fired boiler with a maximum design heat input capacity of 49.3 MMBtu/hr. The average moisture content of the biomass fired in Boiler #4 is approximately 50% by weight. Boiler #4 exhausts to Stack #3, which has an inside diameter of four feet, a three-foot cone, and a height of 135 feet AGL.

Boiler #4 was manufactured and installed at Bates College in Lewiston, Maine prior to 1984 and was moved to the IFP facility in 1994.

Boiler #4 also fires chipped wood pallets. *Solid Wastes Used as Fuels or Ingredients in Combustion Units*, 40 C.F.R. Part 241 includes untreated wood pallets in the definition of "clean cellulosic biomass." This regulation's definition of "traditional fuels" includes clean cellulosic biomass. Therefore, untreated wood pallets are considered a traditional fuel and not a solid waste. The pallets burned in Boiler #4 are not to be coated, painted, or treated in any way, and all fasteners must be removed prior to combustion. Failure to remove fasteners from the pallets may make use of this fuel subject to *Solid Waste Management Rules: Beneficial use of Solid Wastes*, 06-096 C.M.R. ch. 418.

IFP's NSR License A-409-77-3-M, issued 10/02/2018, determined the following fuel use limit as BACT for Boiler #4: Boiler #4 shall not exceed an annual fuel usage of 48,000 ton/year (12-month rolling total basis) of biomass at an assumed moisture content of 50% by weight. IFP shall keep records of fuel usage in Boiler #4 on a monthly and

12-month rolling total basis. [A-409-77-3-M (10/02/2018), BACT] This is Boiler #4's expected biomass-fired tonnage based on operating at 8,760 hours per year.

For the purposes of this license, startup and shutdown of Boiler #4 are defined as follows:

A *startup period* is defined as a period of time commencing when fuel is first fired in the boiler and ending when the combustion chamber temperature exceeds 1,925 °F. The total duration of this period shall not exceed four (4) hours.

A *shutdown period* is defined as a period of time commencing when fuel is no longer being fed into the boiler and ending when ash is no longer exiting the ash handling system. The total duration of this period shall not exceed four (4) hours.

1. Control Equipment

   Particulate matter emissions from Boiler #4 are controlled by two multi-cyclone mechanical dust collectors in series.

2. New Source Performance Standards (NSPS)

   Due to the date of manufacture, Boiler #4 is not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Dc. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more that are constructed after June 9, 1989.

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

   Boiler #4 is subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ. Boiler #4 is considered an existing, biomass-fired boiler. Requirements for this subpart are addressed in Section II.H of this license.

   IFP is not a major source of HAP; therefore, Boiler #4 is not subject to *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters,* 40 C.F.R. Part 63, Subpart DDDDD.

4. Emission Limits and Streamlining

   For Boiler #4, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested (* denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.30 lb/MMBtu	06-096 C.M.R. ch. 103, § 2(B)(4)(a)	Streamlined to 0.27 lb/MMBtu *
PM	0.27 lb/MMBtu	A-409-77-3-M (10/02/2018), BACT	0.27 lb/MMBtu
PM	13.31 lb/hr	A-409-77-3-M (10/02/2018), BACT	13.31 lb/hr
PM_{10}	13.31 lb/hr	A-409-77-3-M (10/02/2018), BACT	13.31 lb/hr
$PM_{2.5}$	13.31 lb/hr	06-096 C.M.R. ch. 140, BPT	13.31 lb/hr
SO_2	1.23 lb/hr	A-409-77-3-M (10/02/2018), BACT	1.23 lb/hr
NO_x	19.72 lb/hr	A-409-77-3-M (10/02/2018), BACT	19.72 lb/hr
CO	29.58 lb/hr	A-409-77-3-M (10/02/2018), BACT	29.58 lb/hr
VOC	0.84 lb/hr	A-409-77-3-M (10/02/2018), BACT	0.84 lb/hr

5. Visible Emissions

   a. 06-096 C.M.R. ch. 101

      Boiler #4 is subject to the following visible emissions standard pursuant to 06-096 C.M.R. ch. 101, § (4)(A)(5)(a):

      Visible emissions from Boiler #4 shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time IFP shall either meet the normal operating visible emissions standard or the following alternative visible emissions standard.

      During periods of startup, shutdown, or malfunction, visible emissions shall not exceed 40% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive six-minute block averages) per event. If this alternative visible emissions standard is utilized, IFP shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.

   b. A-409-77-3-M (10/02/2018), BACT

      Visible emissions from Stack #3 (Boiler #4) shall not exceed 30% opacity on a six-minute block average basis except for periods of startup, shutdown, and malfunction, during which time IFP may elect to demonstrate compliance by complying with all of the following work practice standards.

(1) IFP shall maintain a log (written or electronic) of the date, time, and duration of all operating time, startups, shutdowns, and malfunctions for Boiler #4.

(2) IFP shall develop and implement a written startup and shutdown plan for Boiler #4.

(3) Boiler #4 shall be operated at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Department that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the unit.

c. Streamlining

The Department has determined that the 06-096 C.M.R. ch. 101 visible emissions standard is more stringent than the other applicable limits listed above. Therefore, the visible emission limit has been streamlined to the more stringent 06-096 C.M.R. ch. 101 limit.

6. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boiler #4 shall be demonstrated in accordance with the appropriate test methods upon request by the Department.

IFP operates a non-specification opacity monitor on the exhaust from Boiler #4. This monitor is required for operational purposes, as it gives an indication of visible emission trends that can assist the operator. However, this monitor is not cited or intended for compliance purposes. Compliance with the visible emissions limit from Boiler #4 shall be demonstrated by Method 9 observations upon request of the Department.

7. Periodic Monitoring

IFP shall operate, record data, and maintain records from the following periodic monitors for Boiler #4:

a. Hours of operation for Boiler #4 on a monthly and calendar year basis. [06-096 C.M.R ch. 137]
b. Amount of biomass (tons) fired in Boiler #4 on a monthly, a 12-month rolling total, and a calendar year total. Biomass fuel usage may be calculated from steam flow. [A-409-70-C-R (04/16/2008), BACT]

c. Percent oxygen (% O_2) monitored continuously and recorded at least once per four-hour period. [06-096 C.M.R. ch. 138 § (3)(J)(2)(c)]
d. Records of any maintenance activities performed (planned or unplanned) on each boiler. [A-409-70-F-R/A (11/05/2018), BACT]
e. Records of annual boiler tune-ups. [06-096 C.M.R. ch. 138 § (3)(J)(2)]
f. Records of the date, time, and duration of all startups, shutdowns, and malfunctions for each boiler. [A-409-77-3-M (10/02/2018), BACT]

8. Parameter Monitors

There are no Parameter Monitors required for Boiler #4.

9. CEMS and COMS

There are no CEMS or COMS required for Boiler #4.

H. NESHAP: 40 C.F.R. Part 63, Subpart JJJJJJ

Boilers #1, #2, and #4 are subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ. They are considered existing biomass boilers.

Applicable federal 40 C.F.R. Part 63, Subpart JJJJJJ requirements include the following. Additional rule information can be found on EPA's website; https://www.epa.gov/stationary-sources-air-pollution/compliance-industrial-commercial-and-institutional-area-source.

1. Compliance Dates, Notifications, and Work Practice Standards

a. Boiler Tune-Up Program

(1) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]

(2) Boilers #1 and #2 are considered existing biomass-fired boilers. The boilers are each equipped with oxygen trim systems that do not meet the definition of an oxygen trim system as defined by 40 C.F.R. § 63.11237 "Oxygen trim system." IFP shall conduct tune-ups on Boilers #1 and #2 at least once every two years with no more than 25 months between tune-ups except that a boiler is not required to start up for the sole purpose of conducting a tune-up. [40 C.F.R. § 63.11223(a) and Table 2]

(3) Boiler #4 is considered an existing biomass-fired boiler equipped with an oxygen trim system. IFP shall conduct tune-ups on Boiler #4 at least once every five years with no more than 61 months between tune-ups except that the boiler

is not required to start up for the sole purpose of conducting a tune-up. [40 C.F.R. § 63.11223(a) and Table 2]

(4) 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. [40 C.F.R. § 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 C.F.R. § 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. [40 C.F.R. § 63.11223(b)(3)]
(iv) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 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 C.F.R. § 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 C.F.R. § 63.11223(b)(7)]

(5) Tune-Up Report: A tune-up report shall be maintained onsite and submitted to the Department and/or EPA upon request. 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 C.F.R. § 63.11223(b)(6)]

(6) After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 C.F.R. § 63.11225(a)(4) and 40 C.F.R. § 63.11214(b)] IFP submitted their Notification of Compliance Status to EPA on July 15, 2014.

b. Compliance Report

For every two-year or five-year compliance period, IFP shall prepare a compliance report by March 1st of the following year to document the information below for the two-year or five-year period. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

(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 C.F.R. § 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 §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

c. Energy Assessment

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 C.F.R. § 63.11196(a)(3)] IFP has certified to EPA that the one-time energy assessment has been completed.

2. Recordkeeping

a. Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJJ including the following [40 C.F.R. § 63.11225(c)]:
  (1) Copies of notifications and reports with supporting compliance documentation;
  (2) Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
  (3) Records of the occurrence and duration of each malfunction of each applicable boiler; and

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

b. Records shall be in a form suitable and readily available for expeditious review. Each record must be kept for 5 years following the date of each recorded action. Each record must be kept on-site or be accessible from a central location by computer or other means that instantly provides access at the site for at least 2 years after the date of each recorded action. The records may be maintained off-site for the remaining 3 years. [40 C.F.R. § 63.11225(d)] Note: Standard Condition (6) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ is satisfied by compliance with the more stringent six-year requirement.

I. Generator #1 and Fire Pump #1

IFP operates an emergency generator (Generator #1). Generator #1 is a generator set consisting of an engine and an electrical generator. Generator #1 has an engine rated at 1.2 MMBtu/hr which fires distillate fuel. Generator #1 was manufactured in 1999 and installed in 2009.

IFP operates a fire pump (Fire Pump #1). Fire Pump #1 has an engine rated at 2.0 MMBtu/hr which fires distillate fuel. Fire Pump #1 was manufactured and installed in 1997.

1. *Stationary Generators*, 06-096 C.M.R. ch. 169

   Generator #1 was licensed prior to the effective date of *Stationary Generators*, 06-096 C.M.R. ch. 169 and is therefore exempt from this rule pursuant to section 3(B).

   Fire Pump #1 is not a generator and therefore not subject to this chapter.

2. New Source Performance Standards (NSPS)

   Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 C.F.R. Part 60, Subpart IIII is not applicable to Generator #1 or Fire Pump #1 since the units were ordered before July 11, 2005, and manufactured prior to April 1, 2006.

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

   National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 C.F.R. Part 63, Subpart ZZZZ is applicable to Generator #1 and Fire Pump #1. The units are considered existing, emergency stationary reciprocating internal combustion engines (RICE) at an area

source for HAP and are not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE*) specifically does not exempt these units from the federal requirements.

a. Emergency Engine Designation and Operating Criteria

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

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

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

(2) Non-Emergency Situation Operation

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

(i) An emergency engine may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or

local standards require maintenance and testing of emergency RICE more than 100 hours per calendar year.

(ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

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

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

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

(1) Operation and Maintenance Requirements

(i) IFP shall meet the following operational limitations for each of the compression ignition emergency engines (Generator #1 and Fire Pump #1):

1. Change the oil and filter every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first;
2. Inspect the air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and
3. Inspect the hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

Records shall be maintained documenting compliance with the operational limitations.

[40 C.F.R. § 63.6603(a) and Table 2(d); and 06-096 C.M.R. ch. 115]

(ii) The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or IFP shall develop a maintenance plan which must provide to the extent practicable for the

maintenance and operation of the engines in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

(2) Optional Oil Analysis Program
IFP 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, IFP must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for each engine. The analysis program must be part of the maintenance plan for each engine. [40 C.F.R. § 63.6625(i)]

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 63.6625(f)]

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

(5) Annual Time Limit for Maintenance and Testing
As emergency engines, the units shall each be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). [40 C.F.R. § 63.6640(f)]

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

4. 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 ("*" denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.37 lb/hr	A-409-70-F-R/A (11/5/2018), BPT	0.37 lb/hr
PM_{10}	0.37 lb/hr	A-409-70-F-R/A (11/5/2018), BPT	0.37 lb/hr
$PM_{2.5}$	0.37 lb/hr	A-409-70-F-R/A (11/5/2018), BPT	0.37 lb/hr
SO_2	Negligible (based on 0.0015% sulfur limit, by weight)	A-409-70-D-R (12/31/2013), BPT	Negligible
NO_X	5.29 lb/hr	A-409-70-D-R (12/31/2013), BPT	5.29 lb/hr
CO	1.14 lb/hr	A-409-70-D-R (12/31/2013), BPT	1.14 lb/hr
VOC	0.42 lb/hr	A-409-70-D-R (12/31/2013), BPT	0.42 lb/hr

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

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.62 lb/hr	A-409-70-F-R/A (11/5/2018), BPT	0.62 lb/hr
PM_{10}	0.62 lb/hr	A-409-70-F-R/A (11/5/2018), BPT	0.62 lb/hr
$PM_{2.5}$	0.62 lb/hr	A-409-70-F-R/A (11/5/2018), BPT	0.62 lb/hr
SO_2	Negligible (based on 0.0015% sulfur limit, by weight)	A-409-70-F-R/A (11/5/2018), BPT	Negligible
NO_X	8.82 lb/hr	A-409-70-A-I (04/17/2003), BPT	8.82 lb/hr
CO	1.90 lb/hr	A-409-70-A-I (04/17/2003), BPT	1.90 lb/hr
VOC	0.70 lb/hr	A-409-70-A-I (04/17/2003), BPT	0.70 lb/hr

5. Visible Emissions

IFP's stationary engines are each subject to 06-096 C.M.R. ch. 101 and subject to the following standards.

Visible emissions from Generator #1 and Fire Pump #1 shall each not exceed an opacity of 20% on a six-minute block average basis, except during periods of startup. During periods of startup, the engine must meet the normal operating visible emissions

standard or the or the following work practice standards and alternative visible emissions standard. Use of the following work practice standards and alternative visible emissions standard in lieu of the normal operating visible emissions standard is limited to no more than once per day.

a. The duration of the startup shall not exceed 30 minutes per event;
b. Visible emissions shall not exceed 50% opacity on a six-minute block average basis; and
c. IFP shall keep records as of the date, time, and duration of each startup event.

Note: This does not limit the engine to one startup per day. It only limits the use of the alternative emission standard to once per day.

6. Emission Limit Compliance Methods

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

7. Periodic Monitoring

IFP shall record data and maintain records for the following periodic monitoring values for Generator #1 and Fire Pump #1.

a. Hours of operating time on a calendar year basis. [06-096 C.M.R. ch. 137]
b. Log of the duration and reasons for all operating times as they occur. [40 C.F.R. Part 63, Subpart ZZZZ]
c. Records of all maintenance conducted. [40 C.F.R. Part 63, Subpart ZZZZ]

8. Parameter Monitors

There are no Parameter Monitors required for Generator #1 or Fire Pump #1.

9. CEMS and COMS

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

J. Portable Engines

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

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

K. Drying Kilns

IFP utilizes 11 kilns to dry lumber before sale. Kilns #1 through #11 are track kilns each with rated capacities of 190,000 BF per cycle.
IFP predominantly dries eastern white pine. IFP's NSR Air Emission License Amendment (A-409-77-2-A, dated 07/19/2018) established a kiln throughput restriction of 108.05 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, IFP is restricted to an annual VOC emission limit from kiln operations of no greater than 122.1 tons of VOC per year based on a 12-month rolling total. The emission factor was developed by the National Council for Air and Steam Improvement (NCASI) and published in Technical Bulletin No. 718 dated July 1996. NCASI is a research organization for the pulp and paper industry of the United States and Canada.

L. Parts Washers

The parts washers used at IFP use a solvent that contains less than 5% VOC and are therefore not subject to *Solvent Degreasers,* 06-096 C.M.R. ch. 130 pursuant to Section (1)(B)(3).

M. Cyclones and General Process Emissions

IFP utilizes a number of process cyclones throughout the facility for handling material (such as sawdust and shavings) generated by the wood processing equipment. Blowers convey the material from the process equipment, which includes saws, planers, and wood conveying belts, to the cyclones.

Cyclone #1A serves the Specialty Mill and receives primarily shavings from the Specialty Mill's molder. The discharge of Cyclone #1A is injected into the high-pressure line prior to a two-way diverter valve which directs material to either Cyclone #3A or #4A.

Cyclone #2A & #2B is a "two-pack, high-efficiency, cyclone complex." This system is where Planer Mill shavings and Planer Mill trim saw discharge combine. This cyclone complex includes an inlet splitter section and two high-efficiency cyclones that operate in parallel. The exhaust of Cyclone #2A & #2B is drawn through ductwork by an induced draft fan and then discharged to the atmosphere.

Cyclone #3A serves the Bagger silo. Cyclone #4A serves the Shavings Hopper.

Cyclone #5A serves the Planer Mill Chip Hopper. The Planer Mill project added the Value-Added Mill Shavings exhaust to this unit. This causes this cyclone to occasionally have an increased load. IFP has calculated that the increased loading is still within the unit's design capacity.

Cyclone #6 serves the Dillon Boiler Fuel Silo. The Dillon Boiler Fuel Silo is also called Tek Tank. It receives shavings and sawdust from the Specialty Mill or Value-Added Shop. Cyclone #6 is located at the top of the Dillon Boiler House. The fuel is blown from the Tek Tank to the top of the boiler house where it is dropped into the fuel delivery system via Cyclone #7.

Visible emissions from the cyclones and other general process sources shall each not exceed 20% opacity on a six-minute block average basis.

IFP shall conduct and maintain records from the following:
1. Monthly inspections of each cyclone.
2. Pressure drop across each cyclone recorded at least once per month.
3. Maintenance activities (scheduled or unscheduled) performed on each cyclone.

[A-409-77-4-A (2/24/2020), BACT]

N. Fugitive Emissions

IFP shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.

IFP shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22.

O. Performance Test Protocol

For any performance testing required by this license, IFP shall submit to the Department for approval a performance test protocol, as outlined in the Department's Performance Testing Guidance, at least 30 days prior to the scheduled date of the performance test. [06-096 C.M.R. ch. 140, BPT]

The Department's Performance Testing Guidance is available online;
https://www.maine.gov/dep/air/emissions/testing.html

P. Emission Statements

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

1. The amount of biomass fired (at 50% moisture) in Boilers #1, #2, and #4 on a monthly basis;
2. The amount of distillate fuel fired in Generator #1 and Fire Pump #1 on an annual basis;
3. The sulfur content of the distillate fuel fired in Generator #1 and Fire Pump #1;
4. Kiln throughput on a monthly basis; and
5. Hours each emission unit was operating on a monthly basis.

Every third year, or as requested by the Department, IFP shall report to the Department emissions of hazardous air pollutants as required pursuant to 06-096 C.M.R. ch. 137, § (3)(C). The next report is due no later than May 15, 2027, for emissions occurring in calendar year 2026. The Department will use these reports to calculate and invoice for the applicable annual air quality surcharge for the subsequent three billing periods. IFP shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3). [38 M.R.S. § 353-A(1-A)]

Q. Facility Annual Emissions

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

- Operation of Boilers #1, #2, and #4 at full capacity for 8,760 hr/yr each;
- Operating Generator #1 and Fire Pump #1 for 100 hrs/yr for non-emergency operation each; and
- Drying 108.05 MMBF/year in the kilns.

This information does not represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

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

	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	CO	VOC
Boiler #1	27.0	27.0	27.0	2.2	36.0	54.0	1.5
Boiler #2	27.0	27.0	27.0	2.2	36.0	54.0	1.5
Boiler #4	58.3	58.3	58.3	5.4	86.4	129.6	3.7
Generator #1	-	-	-	-	0.3	0.1	-
Fire Pump #1	-	-	-	-	0.4	0.1	-
Kilns (#1 - #11)	-	-	-	-	-	-	122.1
Total TPY	**112.3**	**112.3**	**112.3**	**9.8**	**159.1**	**237.8**	**128.8**

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

III. AMBIENT AIR QUALITY ANALYSIS

IFP 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-409-71-O-A, issued on 01/19/2001). 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-409-70-H-R pursuant to 06-096 C.M.R. ch. 140 and the preconstruction permitting requirements of 06-096 C.M.R. ch. 115 and subject to the standard and specific conditions below.

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

the Findings of Fact accompanying this Order. As such, the conditions in this license supersede all previously issued air license conditions.

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

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

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

STANDARD STATEMENTS

(1) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 140]

(2) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 C.M.R. ch. 140]

(3) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 C.M.R. ch. 140]

(4) 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, rule, regulation, or Part 70 license requirement. [06-096 C.M.R. ch. 140]

(5) Compliance with the conditions of this Part 70 license will 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 alters or affects 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.

Permit Shield Table

Source	Citation	Description	Basis for Determination
Facility	06-096 C.M.R. ch. 117	Source Surveillance – Emissions Monitoring	No units subject to ch. 117 requirements
Facility	06-096 C.M.R. ch. 134	VOC RACT	Non-exempt equipment emits less than 40 tpy.
Generator #1 and Fire Pump #1	06-096 C.M.R. ch. 138	NO_x RACT	Emergency engines exempt per 06-096 C.M.R. ch. 138 § (1)(B)(2)
All Boilers	40 C.F.R. Part 60, Subpart D	NSPS for Fossil-Fuel-Fired Steam Generators	Maximum heat input for each boiler less than 250 MMBtu/hr
All Boilers	40 C.F.R. Part 60, Subpart Db	NSPS for Industrial-Commercial-Institutional Steam Generating Units	Maximum heat input for each boiler less than 100 MMBtu/hr
All Boilers	40 C.F.R. Part 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 and Fire Pump #1	40 C.F.R. Part 60, Subpart IIII	NSPS for Stationary Compression Ignition Internal Combustion Engines	Units were manufactured prior to the applicability date.
All Boilers	40 C.F.R. Part 63, Subpart DDDDD	NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters	Facility is not a major source of HAP.
Facility	40 C.F.R. Part 64	Compliance Assurance Monitoring	Facility does not contain any equipment that meets CAM requirements.
Facility	40 C.F.R. Part 72	Permits Regulation (Acid Rain)	Facility does not produce electricity for sale.
Facility	40 C.F.R. Part 75	Continuous Emissions Monitoring	Facility not subject to 40 C.F.R. Part 72 or any other NO_x specific regulations

Source	Citation	Description	Basis for Determination
Facility	40 C.F.R. Part 98	Mandatory Greenhouse as 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_2e.

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

(6) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of three or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to 06-096 C.M.R. ch. 140;

B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans will be deemed to be incorporated into the Part 70 license;

C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or

D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

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

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

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

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed safe access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (38 M.R.S. § 347-C). [06-096 C.M.R. ch. 140]

(2) The licensee shall acquire a new or amended air emission license pursuant to 06-096 C.M.R. ch. 115 prior to commencing construction of a modification, unless specifically provided for in 06-096 C.M.R. ch. 140 or 06-096 C.M.R. ch. 115. [06-096 C.M.R. ch. 140]

(3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 C.M.R. ch. 140] **Enforceable by State-only**

(4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to 38 M.R.S. § 353-A. Payment of the annual air emission license fee for IFP is due by the end of February of each year. [38 M.R.S. § 353-A(3)]

(5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 C.M.R. ch. 140] **Enforceable by State-only**

(6) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six years. In addition, the licensee shall retain records of all required monitoring data and support information for a period of at least six years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license. [06-096 C.M.R. ch. 140]

(7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal, 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 does not stay any condition of the Part 70 license. [06-096 C.M.R. ch. 140]

(8) In accordance with the Department's Performance Testing Guidance and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:

A. Submit to the Department for approval a test protocol at least 30 calendar days prior to the scheduled date of the emissions test, unless the Department agrees to a shorter submission timeframe;

B. Perform emissions testing under circumstances representative of the facility's normal process and operating conditions:

1. Within 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 emissions testing.

C. Install or make provisions to install test ports that meet the criteria of 40 C.F.R. Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

D. Submit a written report to the Department within 30 days from date of test completion, unless an extension is granted by the Department.

[06-096 C.M.R. ch. 140] **Enforceable by State-only**

(9) If the results of an emissions 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 30 days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department;

B. The days of violation will be presumed to include the date of the emissions 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 until a demonstration of compliance under normal and representative process and operating conditions is completed.

[06-096 C.M.R. ch. 140] **Enforceable by State-only**

(10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

A. The licensee shall notify the Department within 48 hours of a violation of any emission standard 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 describing all violations of any emission standard.

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

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

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

(11) Upon the written request of the Department, the licensee shall establish and maintain such records; make such reports; install, use, and maintain such monitoring equipment; sample such emissions in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe; and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 C.M.R. ch. 140]

(12) The licensee shall submit semiannual reports of any required periodic monitoring by January 31 and July 31 of each year, or on an equivalent schedule specified in the license.

All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [06-096 C.M.R. ch. 140]

(13) The licensee shall submit a compliance certification to the Department and EPA annually by January 31 of each year, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:

A. The identification of each term or condition of the Part 70 license that is the basis of the certification;
B. The compliance status;
C. Whether compliance was continuous or intermittent;
D. The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
E. Such other facts as the Department may require to determine the compliance status of the source.

The facility's designated responsible official must sign this report. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors.
[06-096 C.M.R. ch. 140]

SPECIFIC CONDITIONS

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

A. Allowable Fuels

1. Boilers #1 and #2 are licensed to fire biomass (as defined in this license) and chipped pallets. The chipped pallets fired in Boilers #1 and #2 shall not be coated, painted, or treated in any way, and all fasteners shall be removed. [A-409-77-3-M (10/02/2018), BACT]
2. Boilers #1 and #2 shall each not exceed an annual fuel usage of 20,000 ton/year (12-month rolling total basis) of biomass at approximately 50% moisture by weight. IFP shall keep records of fuel usage in each boiler on a monthly and 12-month rolling total basis. [A-409-77-3-M (10/02/2018), BACT]

B. Boilers #1 and #2 Emission Limits
(Emission limits are on a 1-hour block average basis unless otherwise stated.)

1. Emissions from Boilers #1 and #2 shall each not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.30	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable

2. Emissions from Boilers #1 and #2 shall each not exceed the following limits:

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	6.17	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable
PM_{10}	6.17	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable
$PM_{2.5}$	6.17	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable
SO_2	0.51	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable
NO_X	8.22	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable
CO	12.34	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable
VOC	0.35	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable

C. Visible Emissions

Visible emissions from Boilers #1 and #2 shall each not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time IFP shall either meet the normal operating visible emissions standard or the following alternative visible emissions standard.

During periods of startup, shutdown, or malfunction for either Boiler #1 or Boiler #2, visible emissions from Stack #1 shall not exceed 40% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive six-minute block averages) per event. If this alternative visible emissions standard is utilized, IFP shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.

[06-096 C.M.R. ch. 101, §§ (4)(A)(5)(a) and (4)(D)]

D. Compliance Methods

Upon request by the Department, IFP shall perform testing to demonstrate compliance with the emission limits for Boilers #1 and #2 using test methods approved by the Department. [06-096 C.M.R. ch. 140, BPT]

E. Periodic Monitoring

IFP shall record data and maintain records for the following periodic monitoring values for Boilers #1 and #2 (each):

1. Hours of operation for Boilers #1 and #2 (each) on a monthly and calendar year basis. [06-096 C.M.R ch. 137]
2. Amount of biomass (tons) fired in each boiler on a monthly, 12-month rolling total, and calendar year total. Biomass fuel usage may be calculated from steam flow. [A-409-70-C-R (04/16/2008), BACT]
3. Percent oxygen (% O_2) monitored continuously and recorded at least once per four-hour period. [06-096 C.M.R. ch. 138 § (3)(J)(2)(c)]
4. Records of any maintenance activities performed (planned or unplanned) on each boiler. [A-409-70-F-R/A (11/05/2018), BACT]
5. Records of annual boiler tune-ups. [06-096 C.M.R. ch. 138 § (3)(J)(2)]
6. Records of the date, time, and duration of all startups, shutdowns, and malfunctions for each boiler. [A-409-77-3-M (10/02/2018), BACT]

(15) **Boiler #4**

A. Allowable Fuels

1. Boiler #4 is licensed to fire biomass (as defined in this license) and chipped pallets. The chipped pallets fired in Boiler #4 shall not be coated, painted, or treated in any way, and all fasteners shall be removed. [A-409-77-3-M (10/02/2018), BACT]
2. Boiler #4 shall not exceed an annual fuel usage of 48,000 ton/year (12-month rolling total basis) of biomass at approximately 50% moisture by weight. IFP shall keep records of fuel usage in Boiler #4 on a monthly and 12-month rolling total basis. [A-409-77-3-M (10/02/2018), BACT]

B. Emissions of particulate matter from Boiler #4 shall be controlled by the operation and maintenance of two multicyclones operated in series during all times. [A-409-77-3-M (10/02/2018), BACT]

C. IFP shall operate and maintain an opacity monitor (non-specification) and an oxygen monitor on Boiler #4. Records of opacity and oxygen (O_2) shall be maintained by IFP with readings logged at least once per 4-hour period. [A-409-77-3-M (10/02/2018), BACT]

D. Boiler #4 Emission Limits
(Emission limits are on a 1-hour block average basis unless otherwise stated.)

1. Emissions from Boiler 4 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.27	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable

2. Emissions from Boiler 4 shall not exceed the following limits:

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	13.31	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable
PM_{10}	13.31	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable
$PM_{2.5}$	13.31	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable
SO_2	1.23	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable
NO_X	19.72	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable
CO	29.58	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable
VOC	0.84	A-409-77-3-M (10/02/2018), BACT	Federally Enforceable

E. Visible Emissions

Visible emissions from Boiler #4 shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time IFP shall either meet the normal operating visible emissions standard or the following alternative visible emissions standard.

During periods of startup, shutdown, or malfunction, visible emissions shall not exceed 40% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive six-minute block averages) per event. If this alternative visible emissions standard is utilized, IFP shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.

[06-096 C.M.R. ch. 101, § (4)(A)(5)(a)]

F. Compliance Methods

Upon request by the Department, IFP shall conduct performance testing to demonstrate compliance with the emission limits for Boiler #4 using test methods approved by the Department. [06-096 C.M.R. ch. 140, BPT]

G. Periodic Monitoring

IFP shall operate, record data, and maintain records from the following periodic monitors for Boiler #4:

1. Hours of operation for Boiler #4 on a monthly and calendar year basis. [06-096 C.M.R ch. 137]
2. Amount of biomass (tons) fired in Boiler #4 on a monthly, a 12-month rolling total, and a calendar year total. Biomass fuel usage may be calculated from steam flow. [A-409-70-C-R (04/16/2008), BACT]
3. Percent oxygen (% O_2) monitored continuously and recorded at least once per four-hour period. [06-096 C.M.R. ch. 138 § (3)(J)(2)(c)]
4. Records of any maintenance activities performed (planned or unplanned) on each boiler. [A-409-70-F-R/A (11/05/2018), BACT]
5. Records of annual boiler tune-ups. [06-096 C.M.R. ch. 138 § (3)(J)(2)]
6. Records of the date, time, and duration of all startups, shutdowns, and malfunctions for each boiler. [A-409-77-3-M (10/02/2018), BACT]

(16) **NESHAP: 40 C.F.R. Part 63, Subpart JJJJJJ**

IFP shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJJ applicable to Boilers #1, #2, and #4 including, but not limited to, the following:

A. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]

1. IFP shall conduct a tune-up on Boilers #1 and #2 at least once every two years with no more than 25 months between tune-ups except that a boiler is not required to startup for the sole purpose of conducting a tune-up. [40 C.F.R. § 63.11223(a) and Table 2]

2. IFP shall conduct a tune-up on Boiler #4 at least once every five years with no more than 61 months between tune-ups except that the boiler is not required to startup for the sole purpose of conducting a tune-up. [40 C.F.R. § 63.11223(a) and Table 2]

3. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
   a. <u>As applicable</u>, 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 for Boilers #1 and #2. Delay of the burner inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for Boiler #4. [40 C.F.R. § 63.11223(b)(1)]

b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R § 63.11223(b)(2)]
c. 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 for Boilers #1 and #2. Delay of the inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for Boiler #4. [40 C.F.R. § 63.11223(b)(3)]
d. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
e. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, **before** and **after** adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]
f. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 C.F.R. § 63.11223(b)(7)]

4. Tune-Up Report: A tune-up report shall be maintained onsite and submitted to the Department and EPA upon request. The report shall contain the following information:
   a. 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;
   b. A description of any corrective actions taken as part of the tune-up of the boiler; and
   c. The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

B. Compliance Report

For every two-year or five-year compliance period, IFP shall prepare a compliance report shall be prepared by March 1st of the following year to document the information below for the two-year or five-year period. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

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:
   a. "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
   b. "No secondary materials that are solid waste were combusted in any affected unit."
   c. "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

C. Recordkeeping

1. Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJJ including the following [40 C.F.R. § 63.11225(c)]:

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

2. Records shall be in a form suitable and readily available for expeditious review. Each record must be kept for 5 years following the date of each recorded action. Each record must be kept on-site or be accessible from a central location by computer or other means that instantly provides access at the site for at least 2 years after the date of each recorded action. The records may be maintained off-site for the remaining 3 years. [40 C.F.R. § 63.11225(d)] Note: Standard Condition (6) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ is satisfied by compliance with the more stringent six-year requirement.

(17) **NO_x RACT**

In accordance with 06-096 C.M.R. ch. 138, § (3)(J)(2), IFP shall comply with the following tune-up recordkeeping requirements for the annual tune-ups required for Boilers #1, #2, and #4:

A. Boiler Tune-up Specifications

1. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly.
2. 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.

B. Recordkeeping Requirements

1. A tune-up procedure file must be kept on-site and made available to the Department upon request.
2. An oxygen/carbon monoxide curve or an oxygen/smoke curve must be kept on file.
3. Once the optimum excess oxygen setting has been determined, IFP must periodically verify that the setting remains at that value.
4. If the oxygen level found is substantially higher than the value provided by the combustion unit manufacturer, IFP must improve the fuel and air mixing, thereby allowing operation with less air.

(18) **Generator #1 and Fire Pump #1**

A. Allowable Operation and Fuels

1. Generator #1 and Fire Pump #1 are licensed to fire distillate fuel. [A-409-70-A-I (04/17/2003), BPT]
2. Generator #1 and Fire Pump #1 each shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 140, BPT]

B. Fuel Sulfur Content

1. The fuel oil sulfur content for Generator #1 and Fire Pump #1 shall be limited to 0.0015% sulfur by weight. [A-409-70-D-R (12/31/2013), BPT]
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. [A-409-70-D-R (12/31/2013), BPT]

C. Emissions shall not exceed the following limits [A-409-70-A-I (04/17/2003), BPT established limits for Fire Pump #1; A-409-70-D-R (12/31/2013), BPT established limits for Generator #1; and A-409-70-F-R/A (11/05/2018), BPT updated the PM limits for Generator #1 and SO_2 limit for Fire Pump #1]

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #1	0.37	0.37	0.37	-	5.29	1.14	0.42
Fire Pump #1	0.62	0.62	0.62	-	8.82	1.90	0.70

D. Visible Emissions

Visible emissions from each Generator #1 and Fire Pump #1 shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time IFP shall either meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard.

1. The duration of the startup shall not exceed 30 minutes per event;
2. Visible emissions shall not exceed 50% opacity on a six-minute block average basis; and
3. IFP shall keep records of the date, time, and duration of each startup.

Use of the work practice standards and alternative visible emissions standard in lieu of the normal operating standard is limited to no more than once per day.

Note: This does not limit the engine to one startup per day. It only limits the use of the alternative emission standard to once per day.
[06-096 C.M.R. ch. 101, § 4(A)(4)]

E. Generator #1 and Fire Pump #1 shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following [40 C.F.R. § 63.6603(a) and Table 2(d); and 06-096 C.M.R. ch. 140, BPT]:

1. IFP shall meet the following operational limitations for Generator #1 and Fire Pump #1:

   a. Change the oil and filter every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first;
   b. Inspect the air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and
   c. Inspect the hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

Records shall be maintained documenting compliance with the operational limitations.

2. Oil Analysis Program Option
   IFP 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, IFP must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 C.F.R.§ 63.6625(i)]

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 63.6625(f)]

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

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

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

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

6. Startup Idle and Startup Time Minimization
   During periods of startup the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe

loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) & 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(19) **Facility Cyclones and General Process Emissions**

A. IFP shall conduct and maintain records of the following:

1. Monthly inspection of each cyclone.
2. Pressure drop across each cyclone recorded at least once per month.
3. Maintenance activities (scheduled or unscheduled) performed on each cyclone.

[A-409-77-4-M (02/24/2020), BACT]

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

(20) **Fugitive Emissions** [06-096 C.M.R. ch. 101, § 4(C)]

A. IFP shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.

B. IFP shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22.

(21) **Performance Test Protocol**

For any performance testing required by this license, IFP shall submit to the Department a performance test protocol, as outlined in the Department's Performance Testing Guidance, at least 30 days prior to the scheduled date of the performance test. [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-only**

(22) **Parameter Monitor General Requirements**

A. Parameter monitors required by this license shall be installed, operated, maintained, and calibrated in accordance with manufacturer recommendations or as otherwise required by the Department.

B. Parameter monitors required by this license shall continuously monitor data at all times the associated emissions unit is in operation. "Continuously" with respect to the operation of parameter monitors required by this license means providing equally

spaced data points with at least one valid data point in each successive 15-minute period. A minimum of three valid 15-minute periods constitute a valid hour.

C. Each parameter monitor must record accurate and reliable data. If any parameter monitor is recording accurate and reliable data less than 98% of the source-operating time within any quarter of the calendar year, the Department may initiate enforcement action. The Department may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the Department's satisfaction that the failure of the system to record such data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions.

[06-096 C.M.R. chs. 140 and 117] **Enforceable by State-only**

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

Note: This semiannual report is separate from, and in addition to, any semiannual report required by specific NSPS or NESHAP regulations.

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

(24) **Annual Emission Statements**

A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, IFP shall annually report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory. The emission statement shall be submitted as specified by the date in 06-096 C.M.R. ch. 137.

B. IFP shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:

1. The amount of biomass fired (at 50% moisture) in Boilers #1, #2, and #4 on a monthly basis;

2. The amount of distillate fuel fired in Generator #1 and Fire Pump #1 on an annual basis;
3. The sulfur content of the distillate fuel fired in Generator #1 and Fire Pump #1;
4. Kiln throughput on a monthly basis; and
5. Hours each emission unit was operating on a monthly basis.

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

C. Every third year, or as requested by the Department, IFP shall report to the Department emissions of hazardous air pollutants as required pursuant to 06-096 C.M.R. ch. 137, § (3)(C). The next report is due no later than May 15, 2027, for emissions occurring in calendar year 2026. IFP shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3). [38 M.R.S. § 353-A (1-A)]

(25) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

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

(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 C.F.R. Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. Examples of such units include refrigerators and any size air conditioners that contain CFCs. [40 C.F.R. Part 82, Subpart F]

(27) **Asbestos Abatement**

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

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

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

B. Pursuant to Title 5 M.R.S. §10002, and 06-096 C.M.R. ch. 140, the Part 70 license shall not expire and all terms and conditions shall remain in effect until the Department takes final action on the renewal application of the Part 70 license. An existing source submitting a complete renewal application under 06-096 C.M.R. ch. 140 prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license. **Enforceable by State-only**

(29) **New Source Review**

IFP is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emission license, and the NSR requirements remain in effect even if this 06-096 C.M.R. ch. 140 Air Emissions License, A-409-70-H-R, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS **17th** DAY OF **JULY**, 2026.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:_____ for
MELANIE LOYZIM, COMMISSIONER

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

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: April 12, 2023
Date of application acceptance: April 12, 2023

This Order prepared by Zac Hicks, Bureau of Air Quality.