



DEPARTMENT ORDER

Pride Manufacturing Company, LLC
Waldo County
Burnham, Maine
A-306-71-N-R

Departmental
Findings of Fact and Order
Air Emission License
Renewal

FINDINGS OF FACT

After review of the air emission 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

Pride Manufacturing Company, LLC (Pride) has applied to renew their Air Emission License for the operation of emission sources associated with their wood products facility. Pride manufactures various wood products, including golf tees and cigar pegs.

The equipment addressed in this license is located at 10 N Main Street, Burnham, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Boiler #1	20.9	149 gal/hr	Distillate fuel	1972	1972	1
Boiler #2	20.9	2,639 lb/hr*	Wood (kiln-dried shavings)	1972	1972	2

* Based on 7,920 BTU per pound of wood

Process Equipment

Equipment	Product/Process	Production Rate	Pollution Control Equipment	Stack #
Wood Chipper	Wood chips	Varies	Size 26 Cyclones	3
Bark Hog	Hog fuel	Varies	Size 20 Cyclones	4
Tool Grinding Room (bench and profile grinders)	Metal grinding for production knives	Varies	55-gallon drum cyclones (2)	Inside collector
Saw Filing Room (band and round saw grinders)	Saw filing for maintenance	Varies	N/A	9

Equipment	Product/Process	Production Rate	Pollution Control Equipment	Stack #
Paint Tumblers	High-Pressure, Low Volume (HPLV) spray painting	Varies	N/A	10-20
Paint Tumblers	HPLV spray painting	Varies	N/A	21
Paint Dryers	Heated drying of painted wood products	1 load/shift	N/A	22-35
Lumber Kilns (7)	Lumber drying	Varies	N/A	36-42
System Line Equipment:				
Molders	Sawed lumber	Varies	Filtered Dust Collectors	5-6
Trim Saws	Cut lumber	5 MMBF/yr* each		
Tumble Sanders	Sanded tees	Varies		
Hand Sanders	Sanded cigar tips and golf tees	Varies		
Tee Lathes	Golf tees	Varies		
Peg Lathes	Cigar pegs	Varies		
Fergusons	Cigar tips	Varies		

* MMBF/yr = million board-feet per year

Parts Washers

Emission Unit ID	Capacity (gallons)	Solvent Used	Solvent % VOC
Degreaser #1	16	Naphtha Solvent	100
Degreaser #2	30	Naphtha Solvent	100

C. 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. Pride should consult with the Department before adding any new biomass type to its fuel mix.

Distillate Fuel means the following:

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

Records or Logs mean either hardcopy or electronic records.

D. Application Classification

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

The application for Pride does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of currently licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115.

E. Facility Classification

With the VOC and HAP limits associated with the wood finishing processes, the facility is licensed as follows:

- As a synthetic minor source of air emissions for criteria pollutants, because Pride is subject to license restrictions that keep facility emissions below major source thresholds for volatile organic compounds (VOC); and
- As an area source of hazardous air pollutants (HAP), because Pride is subject to license restrictions that keep facility emissions below major source thresholds for HAP.

II. BEST PRACTICAL TREATMENT (BPT)

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.

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. Boilers #1 and #2

Pride operates two boilers primarily to provide heat for the lumber kilns, designated Boilers #1 and #2. Both boilers are rated at 20 MMBtu/hr and were manufactured and installed in 1972.

Boiler #1 fires distillate fuel and exhausts to Stack #1. Stack #1 has an above-ground-level (AGL) height of 25 feet and an inside diameter of 2 feet. 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 in Boiler #1 shall not exceed 0.0015% by weight (15 ppm).

Boiler #2 fires wood (kiln-dried shavings). Emissions from Boiler #2 pass through a cyclone and exhaust to Stack #2. Stack #2 has an AGL height of 25 feet and an inside diameter of 1.7 feet.

1. BPT Findings

The BPT emission limits for Boilers #1 and #2 were based on the following:

Distillate Fuel (Boiler #1)

- PM – 0.12 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT
- PM₁₀ – 2.38 lb/1,000 gal based on AP-42 Tables 1.3-2 and 1.3-7 dated 5/10
- PM_{2.5} – 2.13 lb/1,000 gal based on AP-42 Tables 1.3-2 and 1.3-7 dated 5/10
- SO₂ – based on firing distillate fuel with a maximum sulfur content of 0.0015% by weight
- NO_x – 20 lb/1,000 gal based on AP-42 Table 1.3-1 dated 5/10
- CO – 5 lb/1,000 gal based on AP-42 Table 1.3-1 dated 5/10
- VOC – 0.2 lb/1,000 gal based on AP-42 Table 1.3-3 dated 5/10
- Visible Emissions – 06-096 C.M.R. ch. 101

Wood (Boiler #2)

- PM – 0.3 lb/MMBtu based on 06-096 C.M.R. ch. 103
- PM₁₀ – 0.287 lb/MMBtu based on AP-42 Table 1.6-1 dated 4/2022
- PM_{2.5} – 0.177 lb/MMBtu based on AP-42 Table 1.6-1 dated 4/2022
- SO₂ – 0.025 lb/MMBtu based on AP-42 Table 1.6-2 dated 4/2022
- NO_x – 0.49 lb/MMBtu based on AP-42 Table 1.6-2 dated 4/2022
- CO – 0.6 lb/MMBtu based on AP-42 Table 1.6-2 dated 4/2022
- VOC – 0.017 lb/MMBtu based on AP-42 Table 1.6-3 dated 4/2022
- Visible Emissions – 06-096 C.M.R. ch. 101

The BPT emission limits for Boilers #1 and #2 are the following:

Unit	Pollutant	lb/MMBtu
Boiler #1	PM	0.12
Boiler #2	PM	0.3

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)
Boiler #1	2.51	0.36	0.32	0.03	2.99	0.75	0.03
Boiler #2	6.27	6.00	3.70	0.52	10.24	12.54	0.36

Pride shall be limited to 204,000 gallons of distillate fuel for Boiler #1 and 9,000 tons of wood (kiln-dried, as-fired) for Boiler #2 on a 12-month rolling total basis.

2. Visible Emissions

Boiler #1

Visible emissions from Boiler #1 shall not exceed 20% opacity on a six-minute block average basis.

Boiler #2

Visible emissions from Boiler #2 shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time Pride 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, Pride shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.

3. Periodic Monitoring

Periodic monitoring for Boiler #1 shall include recordkeeping to document fuel use both on a monthly and 12-month rolling total basis. Documentation shall include the type of fuel used and sulfur content of the fuel.

Pride tracks the quantity of wood burned in Boiler #2 by monitoring the number of revolutions of the transfer auger that transports the wood fuel into Boiler #2. A study performed by Pride found that each revolution of the transfer auger transports an average 3.439 lb of wood fuel into Boiler #2. Pride shall recalibrate the average weight per rotation annually. The number of transfer auger revolutions are monitored and recorded by the boiler operators. The total wood fired in Boiler #2 shall be calculated on a 12-month rolling total basis by multiplying the number of transfer auger rotations by the most recent calibration of the weight per rotation of the transport auger.

4. New Source Performance Standards (NSPS): 40 C.F.R. Part 60, Subpart Dc

Due to when construction for Boilers #1 and #2 commenced, the boilers are not subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr for which construction, modification, or reconstruction is commenced after June 9, 1989. [40 C.F.R. § 60.40c]

5. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJ

Boilers #1 and #2 are subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ. Boilers #1 and #2 are considered an existing oil boiler and an existing biomass boiler, respectively. [40 C.F.R. §§ 63.11193 and 63.11195]

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

a. Work Practice Requirements

(1) Boiler Tune-Up Program

- (i) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]
- (ii) Tune-ups shall be conducted every 2 years. [40 C.F.R. § 63.11223(a) and Table 2]
- (iii) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
 1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]
 2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]
 3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]

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

(iv) Tune-Up Report: A tune-up report shall be maintained onsite and submitted to the Department and/or EPA upon request. The report shall contain the following information:

1. The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
2. A description of any corrective actions taken as part of the tune-up of the boiler; and
3. The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

(2) Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

- (i) Company name and address;
- (ii) A statement of whether the source has complied with all the relevant requirements of this Subpart;
- (iii) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
- (iv) The following certifications, as applicable:
 1. "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."

2. “No secondary materials that are solid waste were combusted in any affected unit.”
3. “This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler’s time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer’s recommended procedures or procedures specified for a boiler of similar design if manufacturer’s recommended procedures are not available.”

b. 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)]:
 - (i) Copies of notifications and reports with supporting compliance documentation;
 - (ii) 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;
 - (iii) Records of the occurrence and duration of each malfunction of each applicable boiler; and
 - (iv) 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 (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ shall be streamlined to the more stringent six-year requirement.

EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

C. Wood Handling

1. Sawmill and Debarker Areas

Particulate emissions from the sawmill and debarker areas at Pride are controlled by two cyclones. Exhaust from one of these cyclones vents through the roof, while the other unit exhausts through a vent in the wall. The sawdust captured in the cyclones is collected in trailers and either sold or used for fuel in Boiler #2. The use of the cyclones

as a control device for PM emissions represents BPT for both the sawmill and debarker locations at the facility. [06-096 C.M.R. ch. 115, BPT]

Visible emissions from the sawmill and debarker vents shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

2. Woodshop Area

Pride uses a dust collection system equipped with filters to control PM emissions from the facility's trim saws, dowel molders, lathes, sanders, and other wood processing activities. The dust collection system shall be inspected monthly, and filters shall be replaced as required. The filters shall be changed annually, at a minimum. All corrective or preventative maintenance performed on the dust collection system shall be documented in a maintenance log and made available to the Department upon request. [06-096 C.M.R. ch. 115, BPT]

Visible emissions from the dust collection system shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

D. Wood Drying Kilns

Pride operates 7 kilns for drying hardwood lumber. Heat for the kilns is provided in the form of steam from either Boiler #1 or #2.

Besides water, the primary constituent of emissions from the drying of wood in the kilns is VOC. VOC emissions released during kiln drying of lumber are comprised of pinenes, terpenes, aldehydes, ketones, and methanol released from the tannins, resins, fats, waxes, oils, gums, and other aromatic compounds which naturally occur in the wood (*Estimated VOC Losses During the Drying of Five Northeastern Species*, dated December 1999¹). These emissions are emitted along with the moisture (water vapor) from the drying lumber through roof vents in the kilns.

1. Criteria Pollutants

An emission factor of 1.283 lb of VOC per thousand board feet (MBF) was used based on Forest Products Journal article *Estimated VOC Losses during the Drying of Five Northeastern Species*, dated 1999. This emission factor was based on a study for spruce and is therefore conservative for hardwood since literature and industry data show VOC emissions from hardwood lumber drying are consistently lower than from the drying of spruce.

¹ Rice RW, Zibilske L. Estimated VOC losses during the drying of five northeastern species. Forest Products Journal. 1999; 49(11/12):67-70.

Pride is limited to the drying of no more than 8.5 million board feet (MMBF) per year in the kiln drying process based on a 12-month rolling total and shall not dry any pine in the kilns. Pride shall keep monthly records of board feet processed and the species processed. Emissions of VOC from lumber drying in the kilns are expected to be no greater than 5.5 tons/yr.

2. Hazardous Air Pollutants

Potential emissions of total HAP are estimated to be 0.97 tpy based on averaging the emission factors for white and black spruce contained in the *Handbook of Substance-Specific Information for National Pollutant Release Inventory Reporting*, also known as the NPRI Handbook published by the National Council for Air and Stream Improvement (NCASI)². This total is predominantly comprised of acetaldehyde (0.37 tpy) and methanol (0.55 tpy). When reporting actual HAP emissions pursuant to 06-096 C.M.R. ch. 137, Pride shall use the following emission factors (or other methods approved by the Department).

Pollutant	lb/MBF
Acetaldehyde	8.65×10^{-2}
Acrolein	1.15×10^{-3}
Benzene	1.55×10^{-5}
Formaldehyde	8.00×10^{-3}
Methanol	0.129
Methyl Isobutyl Ketone	2.55×10^{-3}
Toluene	2.50×10^{-4}

3. National Emission Standards for Hazardous Air Pollutants

The facility's kilns are not subject to *National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Product*, 40 C.F.R. Part 63, Subpart DDDD. This subpart applies to lumber kilns at plywood and composite wood products (PCWP) manufacturing facilities and any other kind of facility. [40 C.F.R. §§ 63.2231(a) and 63.2232(b)] However, the subpart only applies if the facility is a major source of HAP. [40 C.F.R. § 63.2231(b)] With the annual throughput limit on the kilns, Pride is licensed as an area source of HAP.

E. Wood Finishing

Pride operates a series of processes, including the use of small and large paint tumblers and paint dryers, to apply coating to their wood products. There are also various small paint tumblers, large paint tumblers, and paint dryers.

² Government of Canada. 2023, March 1. *Wood Products Operations*. [Wood products operations - Canada.ca](https://www2.gov.ca/en/gov/about/initiatives/wood-products-operations/)

1. BPT Findings

BPT for all Wood Finishing processes shall include the following: [06-096 C.M.R. ch. 115, BPT]

- a. An annual evaluation of the products, process, and procedures at the facility to reduce emissions, including the use of water-based coatings when feasible to replace or minimize the use of solvent-based paints, mineral spirits, and thinners. Pride shall keep records of these evaluations in accordance with Standard Condition (8).
- b. The use of preheaters to heat paints when possible to allow the paints to flow more easily, thereby requiring fewer mineral spirits and thinners.
- c. The use of good housekeeping practices, including covering paint storage containers with air-tight lids when not adding or removing material from the containers to reduce fugitive VOC and HAP emissions.
- d. The use of fiberglass filters installed in the exhaust ductwork of each of the 11 large paint tumblers for control of PM emissions.

2. Emissions Limits [06-096 C.M.R. ch. 115, BPT]

- a. Emissions of HAPs from the Wood Finishing shall be limited to 8.0 tons/yr of total HAPs, based on a 12-month rolling total basis, as was licensed in A-306-71-J-R (December 11, 2007).
- b. The VOC emissions generated from Wood Finishing are based on the quantity of the coatings used and the coatings' respective safety data sheets (SDS) data for the VOC content (lb/gal); and the assumption that all volatile components in the finish are emitted as VOC. Air Emission License A-306-71-J-R (December 11, 2007) set a license limit of 39.9 tons/yr of VOC emissions from processes based on a 12-month rolling total. The licensed limit was established so that Pride would remain under the 40 tons/yr of VOC emissions threshold of being subject to 06-096 C.M.R. ch. 134, *Reasonably Available Control Technology for Facility that Emit Volatile Organic Compounds* (VOC RACT). However, at the time of the issuance of A-306-71-J-R (December 11, 2007), Pride did not account for the VOC emissions released from the Drying Kilns. Air Emission License A-306-71-L-R/M (March 21, 2014) addressed the VOC RACT requirements for both the Wood Finishing and the Drying Kilns. Pride shall remain limited to a maximum of 39.9 tons/yr of VOC emissions from Wood Finishing on a 12-month rolling total basis.
- c. To ensure compliance with annual emission limits, Pride shall record, on a monthly basis, the quantity of raw materials purchased and in stock which contain VOC and HAPs. Pride shall also maintain records of the content on a percent VOC and HAP

by weight basis for each material or the pounds VOC and HAP per gallon of each material. Monthly inventory data shall be used to determine the quantity of each material used per month. The following equations shall be used to calculate VOC and HAP emissions on a monthly and 12-month rolling total basis:

Total VOC

$$\begin{aligned} & \text{Emissions} \\ & = \sum_{i=1}^n \left[\begin{array}{l} \text{Quantity in stock at beginning of the month} \\ - \text{Quantity in stock at the end of the month} \\ + \text{Monthly product purchases} \end{array} \right] \times \text{VOC content} \end{aligned}$$

Where:

n = the number of different coatings in stock at the facility

Total HAPs

$$\begin{aligned} & \text{Emissions} \\ & = \sum_{i=1}^n \left[\begin{array}{l} \text{Quantity in stock at beginning of the month} \\ - \text{Quantity in stock at the end of the month} \\ + \text{Monthly product purchases} \end{array} \right] \times \text{HAP content} \end{aligned}$$

Where:

n = the number of different coatings in stock at the facility

F. Metal Working

Pride operates 11 stations where metal shaping and cutting equipment is serviced. These stations are located in the Tool Grinding Room. Each service station is equipped with an air intake that flows into two cyclones that are vented through the side of the building. The cyclones also service any filing occurring in the Saw Filing Room.

The use of cyclones represents BPT for all grinding, shaping, cutting, and filing operations within the Grinding and Filing rooms.

[06-096 C.M.R. ch. 115, BPT]

Visible emissions from the metal working vents shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

G. Parts Washers

Pride operates two parts washers, Degreasers #1 and #2, which have a design capacity of 16 gallons and 30 gallons, respectively. The parts washers are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130, and records shall be kept documenting compliance.

This equipment is exempt from *Industrial Cleaning Solvents*, 06-096 C.M.R. ch. 166 pursuant to Section (3)(B).

H. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis.

Visible emissions from any baghouse shall not exceed 10% on a six-minute block average basis.

I. Fugitive Emissions

Pride 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.

Pride 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.

J. VOC RACT

VOC RACT is applicable to sources that have the potential to emit quantities of VOC equal to or greater than 40 tons/yr from non-exempt equipment. Air Emission License A-306-71-L-R/M (March 21, 2014) addressed VOC RACT requirements. The Drying Kilns and Wood Finishing were determined to be meeting VOC RACT. The VOC RACT requirements are incorporated in this renewal.

VOC emissions from Boilers #1 and #2 are exempted from requirements of Chapter 134 because they result from the incomplete combustion of material. [06-096 C.M.R. ch. 134 § 1(C)(4)]

K. Emission Statements

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

1. The amount of distillate fuel fired in Boiler #1 on a monthly basis;
2. The amount of wood fired in Boiler #2 on a monthly basis;
3. The sulfur content of the distillate fuel fired in Boiler #1;
4. Kiln throughput on a monthly basis;
5. Calculations of the VOC and HAP emissions from Wood Finishing on a monthly and calendar year total basis; and
6. Hours each emission unit was active or operating on a monthly basis.

Pride shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). Pride shall pay the annual air quality surcharge, as 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). Reporting year 2026 is the next HAP emissions reporting year (due by May 15, 2027). [38 M.R.S. § 353-A(1-A)]

L. 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 and establishing the facility's potential to emit (PTE). 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:

- Firing 204,000 gal/yr distillate fuel in Boiler #1;
- Firing 9,000 ton/yr wood in Boiler #2;
- An annual throughput of 8.5 MMBF in the Wood Drying Kilns;
- A VOC limit from Wood Finishing of 39.9 tpy; and
- A HAP limit from Wood Finishing of 8.0 tpy.

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	Total HAP
Boiler #1	1.7	0.2	0.2	--	2.0	0.5	--	--
Boiler #2	21.4	20.5	12.6	1.8	34.9	42.8	1.2	--
Wood Drying Kilns	--	--	--	--	--	--	5.5	1.0
Wood Finishing	--	--	--	--	--	--	39.9	8.0
Total TPY	23.1	20.7	12.8	1.8	36.9	43.3	46.6	9.0

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by case basis. In accordance with 06-096 C.M.R. ch. 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM ₁₀	25
PM _{2.5}	15
SO ₂	50
NO _x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

This determination is based on information provided by the applicant regarding licensed emission units. If the Department determines that any parameter (e.g., stack size, configuration, flow rate, emission rates, nearby structures, etc.) deviates from what was included in the application, the Department may require Pride to submit additional information and may require an ambient air quality impact analysis at that time.

ORDER

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

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

The Department hereby grants Air Emission License A-306-71-N-R subject to the following conditions.

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 CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S. § 347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to beginning actual construction of a modification, unless specifically provided for in Chapter 115. [06-096 C.M.R. ch. 115]
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 C.M.R. ch. 115]
- (4) 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. 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S. § 353-A. [06-096 C.M.R. ch. 115]

- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 115]
- (7) The licensee shall maintain and operate all emission units and air pollution 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. 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 C.M.R. ch. 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 C.M.R. ch. 115]
- (10) 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. 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:
 - A. Perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 1. Within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 2. Pursuant to any other requirement of this license to perform stack testing.
 - B. Install or make provisions to install test ports that meet the criteria of 40 C.F.R. Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - C. Submit a written report to the Department within thirty (30) days from date of test completion.

[06-096 C.M.R. ch. 115]

- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. Within thirty (30) days following receipt of the written test report by the Department, or another alternative timeframe approved by the Department, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department; and
 - B. The days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - C. The licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
[06-096 C.M.R. ch. 115]
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or license requirement. [06-096 C.M.R. ch. 115]
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 C.M.R. ch. 115]
- (15) Upon written request from 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 a 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. 115]

- (16) The licensee shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S. § 605). [06-096 C.M.R. ch. 115]

SPECIFIC CONDITIONS

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

A. Fuel

1. Total fuel use for Boiler #1 shall not exceed 204,000 gal/yr of distillate fuel, based on a 12-month rolling total basis. [06-096 C.M.R. ch. 115, BPT]
2. The facility shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [06-096 C.M.R. ch. 115, BPT]
3. Total fuel use for Boiler #2 shall not exceed 9,000 tons of wood (kiln dried shavings). The number of transfer auger revolutions shall be monitored and recorded by the boiler operators. Pride shall recalibrate the average weight per rotation annually. The wood fired in Boiler #2 shall be calculated on a 12-month rolling total basis by multiplying the number of transfer auger rotations by most recent calibration of the weight per rotation of the transport auger. [06-096 C.M.R. ch. 115, BPT]
4. Compliance shall be demonstrated by fuel records showing the quantity, type, and the percent sulfur (if applicable), of the fuel delivered or fuel used. Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier, a statement from the supplier that the fuel delivered meets Maine's fuel sulfur content standards, certificate of analysis, or testing of fuel in the tank on-site. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.12	06-096 C.M.R. ch. 115, BPT
Boiler #2	PM	0.3	06-096 C.M.R. ch. 103 § 2(B)(4)(a)

C. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Emission 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)
Boiler #1	2.51	0.36	0.32	0.03	2.99	0.75	0.03
Boiler #2	6.27	6.00	3.70	0.52	10.24	12.54	0.36

D. Visible Emissions

1. Boiler #1

Visible emissions from Boiler #1 shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(2)]

2. Boiler #2

Visible emissions from Boiler #2 shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time Pride 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, Pride 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)]

E. Pride shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJ applicable to Boilers #1 and #2 including, but not limited to, the following:
[incorporated under 06-096 C.M.R. ch. 115, BPT]

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

a. Each tune-up shall be conducted every 2 years. [40 C.F.R. § 63.11223(a) and Table 2]

b. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

(1) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]

(2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]

(3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection

until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]

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

c. Tune-Up Report: A tune-up report shall be maintained onsite and submitted to the Department and EPA upon request. The report shall contain the following information:

- (1) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
- (2) A description of any corrective actions taken as part of the tune-up of the boiler; and
- (3) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

2. Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

- a. Company name and address;
- b. A statement of whether the source has complied with all the relevant requirements of this Subpart;
- c. A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
- d. The following certifications, as applicable:
 - (1) "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."

- (2) “No secondary materials that are solid waste were combusted in any affected unit.”
- (3) “This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler’s time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer’s recommended procedures or procedures specified for a boiler of similar design if manufacturer’s recommended procedures are not available.”

3. 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 (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ shall be streamlined to the more stringent six-year requirement.

EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

(18) **Wood Handling**

A. Sawmill and Debarker Areas

1. Emissions from the sawmill and debarker areas shall be vented through the cyclones. [06-096 C.M.R. ch. 115, BPT]

2. Visible emissions from the sawmill and debarker vents shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]
- B. Woodshop Area (trim saws, dowel molders, lathes, sanders, wood processing activities)
1. Emissions from the woodshop area shall be vented through the dust collection system. [06-096 C.M.R. ch. 115, BPT]
 2. Pride shall inspect the dust collection system monthly and replace filters as required. The filters shall be changed annually, at a minimum. All corrective or preventative maintenance performed on the dust collection system shall be documented in a maintenance log and made available to the Department upon request. [06-096 C.M.R. ch. 115, BPT]
 3. Visible emissions from the dust collection system shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

(19) **Wood Drying Kilns**

- A. Pride shall not exceed a yearly throughput of 8.5 million board feet per year based on a 12-month rolling total.
- B. Pride shall keep monthly records of board feet of each species processed.

[06-096 C.M.R. ch. 115, BPT]

(20) **Wood Finishing**

- A. Pride shall conduct an annual evaluation of the products, processes, and procedures at the facility to reduce emissions, including the use of water-based coatings when feasible to replace or minimize the use of solvent-based paints, mineral spirits, and thinners. Pride shall keep records of these evaluations in accordance with Standard Condition (8).
- B. Pride shall use preheaters to heat paints when possible to allow the coatings to flow more easily, thereby requiring fewer mineral spirits and thinners.
- C. Pride shall use good housekeeping practices, including covering paint storage containers with air-tight lids when not adding or removing material from the containers to reduce fugitive VOC and HAP emissions.
- D. Pride shall use fiberglass filters installed in the exhaust ductwork of each of the 11 large paint tumblers for control of PM emissions.

- E. Pride shall limit total HAP emissions to 8.0 tpy based on a 12-month rolling total.
- F. Pride shall limit total VOC emissions to 39.9 tpy based on a 12-month rolling total.
- G. To ensure compliance with annual emission limits, Pride shall record, on a monthly basis, the quantity of raw materials purchased and in stock which contain VOC and HAPs. Pride shall also maintain records of the content on a percent VOC and HAP by weight basis for each material or the pounds VOC and HAP per gallon of each material. Monthly inventory data shall be used to determine the quantity of each material used per month. The following equations shall be used to calculate VOC and HAP emissions on a monthly and 12-month rolling total basis:

Total VOC

$$\text{Emissions} = \sum_{i=1}^n \left[\begin{array}{l} \text{Quantity in stock at beginning of the month} \\ - \text{Quantity in stock at the end of the month} \\ + \text{Monthly product purchases} \end{array} \right] \times \text{VOC content}]$$

Where:

n = the number of different coatings in stock at the facility

Total HAPs

$$\text{Emissions} = \sum_{i=1}^n \left[\begin{array}{l} \text{Quantity in stock at beginning of the month} \\ - \text{Quantity in stock at the end of the month} \\ + \text{Monthly product purchases} \end{array} \right] \times \text{HAP content}]$$

Where:

n = the number of different coatings in stock at the facility

[06-096 C.M.R. ch. 115, BPT]

(21) Metal Working (Tool Grinding and Saw Filing Rooms)

- A. Emissions from the grinding, shaping, cutting, and filing operations in the Tool Grinding and Saw Filing Rooms shall be vented through the cyclones. [06-096 C.M.R. ch. 115, BPT]
- B. Visible emissions from the metal working vents shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

(22) **Parts Washers (Degreasers #1 and #2)**

Degreasers #1 and #2 at Pride are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130.

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

2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches.
3. Each parts washer shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent.
[06-096 C.M.R. ch. 130]

(23) **General Process Sources**

- A. Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]
- B. Visible emissions from any baghouse shall not exceed 10% on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(3)]

(24) **Fugitive Emissions**

- A. Pride 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. Pride 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.

[06-096 C.M.R. ch. 101, § 4(C)]

(25) **Annual Emission Statements**

- A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, Pride 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. Pride shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:
 1. The amount of distillate fuel fired in Boiler #1 on a monthly basis;
 2. The amount of wood fired in Boiler #2 on a monthly basis;
 3. The sulfur content of the distillate fuel fired in Boiler #1;
 4. Kiln throughput on a monthly basis;

Pride Manufacturing Company, LLC
Waldo County
Burnham, Maine
A-306-71-N-R

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Findings of Fact and Order
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Renewal**

5. Calculations of the VOC and HAP emissions from Wood Finishing on a monthly and calendar year total basis; and
6. Hours each emission unit was active or operating on a monthly basis.

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

C. Pride shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). Pride shall pay the annual air quality surcharge, as 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). Reporting year 2026 is the next HAP emissions reporting year (such report due May 15, 2027). [38 M.R.S. § 353-A(1-A)]

- (26) If the Department determines that any parameter value pertaining to construction and operation of the emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, Pride may be required to submit additional information. Upon written request from the Department, Pride shall provide information necessary to demonstrate AAQS will not be exceeded, potentially including submission of an ambient air quality impact analysis or an application to amend this air emission license to resolve any deficiencies and ensure compliance with AAQS. Submission of this information is due within 60 days of the Department's written request unless otherwise stated in the Department's letter.
[06-096 C.M.R. ch. 115, § 2(O)]

DONE AND DATED IN AUGUSTA, MAINE THIS 15th DAY OF JULY, 2024.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, COMMISSIONER

The term of this license shall be ten (10) years from the signature date above.

[Note: If a renewal application, determined as complete by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 M.R.S. § 10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 20, 2024
Date of application acceptance: March 20, 2024

Date filed with the Board of Environmental Protection:

This Order prepared by Kendra Nash, Bureau of Air Quality.

FILED
JUL 15, 2024
State of Maine
Board of Environmental Protection