

**RIPUC Use Only**

Date Application Received: \_\_\_/\_\_\_/\_\_\_  
Date Review Completed: \_\_\_/\_\_\_/\_\_\_  
Date Commission Action: \_\_\_/\_\_\_/\_\_\_  
Date Commission Approved: \_\_\_/\_\_\_/\_\_\_

GIS Certification #:

NON107661

## RENEWABLE ENERGY RESOURCES ELIGIBILITY FORM

**The Standard Application Form  
Required of all Applicants for Certification of Eligibility of Renewable Energy Resource  
(Version 8 – December 5, 2012)**

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION  
Pursuant to the Renewable Energy Act  
Section 39-26-1 et. seq. of the General Laws of Rhode Island**

**NOTICE:**

When completing this Renewable Energy Resources Eligibility Form and any applicable Appendices, please refer to the State of Rhode Island and Providence Plantations Public Utilities Commission Rules and Regulations Governing the Implementation of a Renewable Energy Standard (RES Regulations, Effective Date: January 1, 2006), and the associated RES Certification Filing Methodology Guide. All applicable regulations, procedures and guidelines are available on the Commission's web site: [www.ripuc.org/utilityinfo/res.html](http://www.ripuc.org/utilityinfo/res.html). Also, all filings must be in conformance with the Commission's Rules of Practice and Procedure, in particular, Rule 1.5, or its successor regulation, entitled "Formal Requirements as to Filings."

- Please complete the Renewable Energy Resources Eligibility Form and Appendices using a typewriter or black ink.
- Please submit one original and three copies of the completed Application Form, applicable Appendices and all supporting documentation to the Commission at the following address:  
Rhode Island Public Utilities Commission  
Attn: Luly E. Massaro, Commission Clerk  
89 Jefferson Blvd  
Warwick, RI 02888

In addition to the paper copies, electronic/email submittals are required under Commission regulations. Such electronic submittals should be sent to [Res.filings@puc.ri.gov](mailto:Res.filings@puc.ri.gov).

- In addition to filing with the Commission, Applicants are required to send, electronically or electronically and in paper format, a copy of the completed Application including all attachments and supporting documentation, to the Division of Public Utilities and Carriers and to all interested parties. A list of interested parties can be obtained from the Commission's website at [www.ripuc.org/utilityinfo/res.html](http://www.ripuc.org/utilityinfo/res.html).
- Keep a copy of the completed Application for your records.
- The Commission will notify the Authorized Representative if the Application is incomplete.
- Pursuant to Section 6.0 of the RES Regulations, the Commission shall provide a thirty (30) day period for public comment following posting of any administratively complete Application.
- Please note that all information submitted on or attached to the Application is considered to be a public record unless the Commission agrees to deem some portion of the application confidential after consideration under section 1.2(g) of the Commission's Rules of Practice and Procedure.
- In accordance with Section 6.2 of the RES Regulations, the Commission will provide prospective reviews for Applicants seeking a preliminary determination as to whether a facility would be eligible prior to the formal certification process described in Section 6.1 of the RES Regulations. Please note that space is provided on the Form for applicant to designate the type of review being requested.
- Questions related to this Renewable Energy Resources Eligibility Form should be submitted in writing, preferably via email and directed to: Luly E. Massaro, Commission Clerk at [Res.filings@puc.ri.gov](mailto:Res.filings@puc.ri.gov).

**SECTION I: Identification Information**

1.1 Name of Generation Unit (sufficient for full and unique identification):  
Cersosimo Lumber

1.2 Type of Certification being requested (check one):

Standard Certification     Prospective Certification (Declaratory Judgment)

1.3 This Application includes: (Check all that apply)<sup>1</sup>

- APPENDIX A: Authorized Representative Certification for Individual Owner or Operator
- APPENDIX B: Authorized Representative Certification for Non-Corporate Entities Other Than Individuals
- APPENDIX C: Existing Renewable Energy Resources
- APPENDIX D: Special Provisions for Aggregators of Customer-sited or Off-grid Generation Facilities
- APPENDIX E: Special Provisions for a Generation Unit Located in a Control Area Adjacent to NEPOOL
- APPENDIX F: Fuel Source Plan for Eligible Biomass Fuels

1.4 Primary Contact Person name and title: Jeff Hardy, VP

1.5 Primary Contact Person address and contact information:  
Address: 1103 Vernon Street, Brattleboro, VT 05301

Phone: 802-254-4508                      Fax: 802-254-5691  
Email: jhardy@cersosimo.com

1.6 Backup Contact Person name and title: Lauren Keyes, Technical Assistant

1.7 Backup Contact Person address and contact information:  
Address: P.O. Box 1938, Manchester Center, VT 05255

Phone: 802-362-0748                      Fax: \_\_\_\_\_  
Email: lkeyes@veppi.org

<sup>1</sup> Please note that all Applicants are required to complete the Renewable Energy Resources Eligibility Standard Application Form and all of the Appendices that apply to the Generation Unit or Owner or Operator that is the subject of this Form. Please omit Appendices that do not apply.

1.8 Name and Title of Authorized Representative (*i.e.*, the individual responsible for certifying the accuracy of all information contained in this form and associated appendices, and whose signature will appear on the application):

Jeff Hardy, Vice President    Cersosimo Lumber Company, Inc.

Appendix A or B (as appropriate) completed and attached?  Yes    No    N/A

1.9 Authorized Representative address and contact information:

Address: 1103 Vernon Street, Brattleboro, Vermont 05301

Phone: 802-254-4508                      Fax: 802-254-5691

Email: \_\_\_\_\_

1.10 Owner name and title: Cersosimo Lumber Company, Inc.

( Corporate Ownership )

1.11 Owner address and contact information:

Address: 1103 Vernon Street, Brattleboro, Vermont 05301

Phone: 802-254-4508                      Fax: 802-254-4508

Email: \_\_\_\_\_

1.12 Owner business organization type (check one):

- Individual
- Partnership
- Corporation
- Other: \_\_\_\_\_

1.13 Operator name and title: Cersosimo Lumber Company, Inc.

1.14 Operator address and contact information:

Address: same as above

Phone: \_\_\_\_\_                      Fax: \_\_\_\_\_

Email: \_\_\_\_\_

1.15 Operator business organization type (check one):

- Individual
- Partnership
- Corporation
- Other: \_\_\_\_\_

**SECTION II: Generation Unit Information, Fuels, Energy Resources and Technologies**

2.1 ISO-NE Generation Unit Asset Identification Number or NEPOOL GIS Identification Number (either or both as applicable): NON 107661

2.2 Generation Unit Nameplate Capacity: 800 MW

2.3 Maximum Demonstrated Capacity: 450 MW

2.4 Please indicate which of the following Eligible Renewable Energy Resources are used by the Generation Unit: (Check ALL that apply) – *per RES Regulations Section 5.0*

- Direct solar radiation
- The wind
- Movement of or the latent heat of the ocean
- The heat of the earth
- Small hydro facilities
- Biomass facilities using Eligible Biomass Fuels and maintaining compliance with all aspects of current air permits; Eligible Biomass Fuels may be co-fired with fossil fuels, provided that only the renewable energy fraction of production from multi-fuel facilities shall be considered eligible.
- Biomass facilities using unlisted biomass fuel
- Biomass facilities, multi-fueled or using fossil fuel co-firing
- Fuel cells using a renewable resource referenced in this section

2.5 If the box checked in Section 2.4 above is “Small hydro facilities”, please certify that the facility’s aggregate capacity does not exceed 30 MW. – *per RES Regulations Section 3.32*

- ← check this box to certify that the above statement is true
- N/A or other (please explain) \_\_\_\_\_

2.6 If the box checked in Section 2.4 above is “Small hydro facilities”, please certify that the facility does not involve any new impoundment or diversion of water with an average salinity of twenty (20) parts per thousand or less. – *per RES Regulations Section 3.32*

- ← check this box to certify that the above statement is true
- N/A or other (please explain) \_\_\_\_\_

2.7 If you checked one of the Biomass facilities boxes in Section 2.4 above, please respond to the following:

A. Please specify the fuel or fuels used or to be used in the Unit: 100% clean wood chips and sawdust

B. Please complete and attach Appendix F, Eligible Biomass Fuel Source Plan.  
Appendix F completed and attached?  Yes  No  N/A

2.8 Has the Generation Unit been certified as a Renewable Energy Resource for eligibility in another state's renewable portfolio standard?

Yes       No      If yes, please attach a copy of that state's certifying order.

Copy of State's certifying order attached?       Yes       No       N/A

### SECTION III: Commercial Operation Date

Please provide documentation to support all claims and responses to the following questions:

3.1 Date Generation Unit first entered Commercial Operation: 12 / 23 / 2012 at the site.

If the commercial operation date is after December 31, 1997, please provide independent verification, such as the utility log or metering data, showing that the meter first spun after December 31, 1997. This is needed in order to verify that the facility qualifies as a New Renewable Energy Resource.

Documentation attached?       Yes       No       N/A

3.2 Is there an Existing Renewable Energy Resource located at the site of Generation Unit?

Yes

No

3.3 If the date entered in response to question 3.1 is earlier than December 31, 1997 or if you checked "Yes" in response to question 3.2 above, please complete Appendix C.

Appendix C completed and attached?       Yes       No       N/A

3.4 Was all or any part of the Generation Unit used on or before December 31, 1997 to generate electricity at any other site?

Yes

No

3.5 If you checked "Yes" to question 3.4 above, please specify the power production equipment used and the address where such power production equipment produced electricity (attach more detail if the space provided is not sufficient):

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### SECTION IV: Metering

4.1 Please indicate how the Generation Unit's electrical energy output is verified (check all that apply):

ISO-NE Market Settlement System

Self-reported to the NEPOOL GIS Administrator

Other (please specify below and see Appendix D: Eligibility for Aggregations):  
Generation will be reported by VEPP, Inc. acting as Rhode Island approved  
independent verifier.

Appendix D completed and attached?  Yes  No  N/A

**SECTION V: Location**

5.1 Please check one of the following that apply to the Generation Unit:

- Grid Connected Generation  
 Off-Grid Generation (not connected to a utility transmission or distribution system)  
 Customer Sited Generation (interconnected on the end-use customer side of the retail electricity meter in such a manner that it displaces all or part of the metered consumption of the end-use customer)

5.2 Generation Unit address: 1103 Vernon St, Brattleboro, Vermont 05301  
\_\_\_\_\_  
\_\_\_\_\_

5.3 Please provide the Generation Unit's geographic location information:

- A. Universal Transverse Mercator Coordinates: 4744368 700294 18T  
B. Longitude/Latitude: 42 49'32.42"N 72 32'58.68"W

5.4 The Generation Unit located: (please check the appropriate box)

- In the NEPOOL control area  
 In a control area adjacent to the NEPOOL control area  
 In a control area other than NEPOOL which is not adjacent to the NEPOOL control area ← *If you checked this box, then the generator does not qualify for the RI RES – therefore, please do not complete/submit this form.*

5.5 If you checked "In a control area adjacent to the NEPOOL control area" in Section 5.4 above, please complete Appendix E.

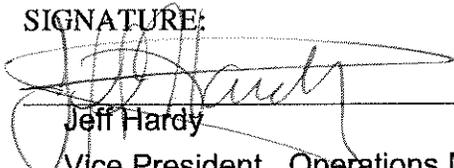
Appendix E completed and attached?  Yes  No  N/A



6.2 Authorized Representative Certification and Signature:

I hereby certify, under pains and penalties of perjury, that I have personally examined and am familiar with the information submitted herein and based upon my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties, both civil and criminal, for submitting false information, including possible fines and punishment. My signature below certifies all information submitted on this Renewable Energy Resources Eligibility Form. The Renewable Energy Resources Eligibility Form includes the Standard Application Form and all required Appendices and attachments. I acknowledge that the Generation Unit is obligated to and will notify the Commission promptly in the event of a change in a generator's eligibility status (including, without limitation, the status of the air permits) and that when and if, in the Commission's opinion, after due consideration, there is a material change in the characteristics of a Generation Unit or its fuel stream that could alter its eligibility, such Generation Unit must be re-certified in accordance with Section 9.0 of the RES Regulations. I further acknowledge that the Generation Unit is obligated to and will file such quarterly or other reports as required by the Regulations and the Commission in its certification order. I understand that the Generation Unit will be immediately de-certified if it fails to file such reports.

Signature of Authorized Representative:

SIGNATURE:  _____ Jeff Hardy _____ Vice President, Operations Manager (Title)	DATE:  7-10-2018 _____
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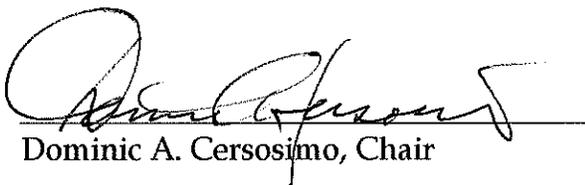
**Certificate of Vote**  
**Cersosimo Lumber Company, Inc.**

The following resolution was adopted by the Board of Directors of Cersosimo Lumber Company, Inc. this 9<sup>th</sup> day of July 2018, to wit;

Resolved: That Jeff Hardy, Vice President and General Manager of Wood Products Manufacturing and Kiln Drying and Marketing Divisions is hereby authorized to execute the Renewable Energy Resources Eligibility Form on behalf of Cersosimo Lumber Company, Inc.

Dated at Brattleboro, Vermont this 9<sup>th</sup> day of July 2018.

**Cersosimo Lumber Company, Inc.**

By:   
Dominic A. Cersosimo, Chair

By:   
Michael A. Cersosimo

By:   
W. Neil Dawson

**APPENDIX F**  
**(Revised 6/11/10)**  
**Eligible Biomass Fuel Source Plan**  
**(Required of all Applicants Proposing to Use An Eligible Biomass Fuel)**

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**  
**Part of Application for Certificate of Eligibility**  
**RENEWABLE ENERGY RESOURCES ELIGIBILITY FORM**  
**Pursuant to the Renewable Energy Act**  
**Section 39-26-1 et. seq. of the General Laws of Rhode Island**

**Note to Applicants: Please refer to the RES Certification Filing Methodology Guide posted on the Commission's web site ([www.ripuc.org/utilityinfo/res.html](http://www.ripuc.org/utilityinfo/res.html)) for information, templates and suggestions regarding the types and levels of detail appropriate for responses to specific application items requested below. Also, please see Section 6.9 of the RES Regulations for additional details on specific requirements.**

The phrase "Eligible Biomass Fuel" (per RES Regulations Section 3.7) means fuel sources including brush, stumps, lumber ends and trimmings, wood pallets, bark, wood chips, shavings, slash, yard trimmings, site clearing waste, wood packaging, and other clean wood that is not mixed with other unsorted solid wastes<sup>5</sup>; agricultural waste, food and vegetative material; energy crops; landfill methane<sup>6</sup> or biogas<sup>7</sup>, provided that such gas is collected and conveyed directly to the Generation Unit without use of facilities used as common carriers of natural gas; or neat bio-diesel and other neat liquid fuels that are derived from such fuel sources.

In determining if an Eligible Biomass Generation Unit shall be certified, the Commission will consider if the fuel source plan can reasonably be expected to ensure that only Eligible Biomass Fuels will be used, and in the case of co-firing ensure that only that proportion of generation attributable to an Eligible Biomass Fuel be eligible. Certification will not be granted to those Generation Units with fuel source plans the Commission deems inadequate for these purposes.

<sup>5</sup> Generation Units using wood sources other than those listed above may make application, as part of the required fuel source plan described in Section 6.9 of the RES Regulations, for the Commission to approve a particular wood source as "clean wood." The burden will be on the applicant to demonstrate that the wood source is at least as clean as those listed in the legislation. Wood sources containing resins, glues, laminates, paints, preservatives, or other treatments that would combust or off-gas, or mixed with any other material that would burn, melt, or create other residue aside from wood ash, will not be approved as clean wood.

<sup>6</sup> Landfill gas, which is an Eligible Biomass Fuel, means only that gas recovered from inside a landfill and resulting from the natural decomposition of waste, and that would otherwise be vented or flared as part of the landfill's normal operation if not used as a fuel source.

<sup>7</sup> Gas resulting from the anaerobic digestion of sewage or manure is considered to be a type of biogas, and therefore an Eligible Biomass Fuel that has been fully separated from the waste stream.

This Appendix must be attached to the front of Applicant's Fuel Source Plan required for Generating Units proposing to use an Eligible Biomass Fuel (per Section 6.9 of RES Regulations).

- F.1 The attached Fuel Source Plan includes a detailed description of the type of Eligible Biomass Fuel to be used at the Generation Unit.

Detailed description attached?  Yes  No  N/A

Comments: Detailed description of eligible biomass fuel source is included in section 2 or page 3 of the fuel source plan.

- F.2 If the proposed fuel is "other clean wood," the Fuel Source Plan should include any further substantiation to demonstrate why the fuel source should be considered as clean as those clean wood sources listed in the legislation.

Further substantiation attached?  Yes  No  N/A

Comments: \_\_\_\_\_

- F.3 In the case of co-firing with ineligible fuels, the Fuel Source Plan must include a description of (a) how such co-firing will occur; (b) how the relative amounts of Eligible Biomass Fuel and ineligible fuel will be measured; and (c) how the eligible portion of generation output will be calculated. Such calculations shall be based on the energy content of all of the proposed fuels used.

Description attached?  Yes  No  N/A

Comments: \_\_\_\_\_

- F.4 The Fuel Source Plan must provide a description of what measures will be taken to ensure that only the Eligible Biomass Fuel are used, examples of which may include: standard operating protocols or procedures that will be implemented at the Generation Unit, contracts with fuel suppliers, testing or sampling regimes.

Description provided?  Yes  No  N/A

Comments: Detailed description for vendor fuel deliveries is in Section 4 (pgs 5 & 6) of the fuel source plan.

- F.5 Please include in the Fuel Source Plan an acknowledgement that the fuels stored at or brought to the Generation Unit will only be either Eligible Biomass Fuels or fossil fuels used for co-firing and that Biomass Fuels not deemed eligible will not be allowed at the premises of the certified Generation Unit. And please check the following box to certify that this statement is true.

check this box to certify that the above statement is true

N/A or other (please explain) \_\_\_\_\_

F.6 If the proposed fuel includes recycled wood waste, please submit documentation that such fuel meets the definition of Eligible Biomass Fuel and also meets material separation, storage, or handling standards acceptable to the Commission and furthermore consistent with the RES Regulations.

Documentation attached?  Yes  No  N/A

Comments: 100 % of clean wood fuel. NO recycled wood waste used.

F.7 Please certify that you will file all reports and other information necessary to enable the Commission to verify the on-going eligibility of the renewable energy generators pursuant to Section 6.3 of the RES Regulations. Specifically, RES Regulations Section 6.3(i) states that Renewable Energy Resources of the type that combust fuel to generate electricity must file quarterly reports due 60 days after the end of each quarter on the fuel stream used during the quarter. Instructions and filing documents for the quarterly reports can be found on the Commissions website or can be furnished upon request.

check this box to certify that the above statement is true

N/A or other (please explain) \_\_\_\_\_

Please see attachment A for full explanation that will explain our concerns.

F.8 Please attach a copy of the Generation Unit's Valid Air Permit or equivalent authorization.

Valid Air Permit or equivalent attached?  Yes  No  N/A

Comments: Current Permit Valid 7-5-2016 to 7-5-2021

F.9 Effective date of Valid Air Permit or equivalent authorization:

0 7 / 0 5 / 16

F.10 State or jurisdiction issuing Valid Air Permit or equivalent authorization:  
Vermont Agency of Natural Resources - Air Quality and Climate Division

# ATTACHMENT "A"

## EXPLANATION OF ITEM F 7

Filing of quarterly reports about the fuel stream used during the quarter are possible to be completed, however, the amount of fuel burned and the corresponding higher heat BTU value of that fuel will exceed the BTU content required to generate the amount of electricity we produce during any given quarter for the following reasons:

1. Historically steam has always been produced to dry our lumber. It is an added value that it also is used to generate power. The steam that passes through our generation unit must exit with enough BTU content to operate our dry kilns. Therefore, these BTUs are not and cannot be extracted by the generation unit.
2. Whenever steam plant pressure is low or we are experiencing problems in our steam distribution system, the steam is sometimes routed to the dry kilns without passing through the generation unit at all. In that case a specialized valve passes steam directly to the kilns whether the generator is running or not

December 26, 2012

Cersosimo Lumber Company, Inc.  
Jeffrey Morse  
1103 Vernon Street  
Brattleboro, VT 05301

**Re: SPEED Standard Offer Commissioning Milestone**

Dear Jeffrey:

Congratulations! You have satisfied your SPEED Standard Offer Commissioning Milestone as of December 21, 2012. I will direct the bank to return your refundable deposit in the amount of \$8,000.00.

Very truly yours,  
VEPP Inc.

John R. Spencer  
Executive Director

cc: Vermont Public Service Board

Cersosimo Lumber Co.  
Fuel Source Plan  
For  
Biomass Co-generation  
Steam Plant

# Table of Contents

General Description	Page 2
Fuel type Categories	Page 3
Mill Fuel	Page 4
Vendor fuel	Page 5
Supplier Approval	Page 5
Vendor Deliveries	Page 5
Vendor Fuel Processing	Page 5
Processed Vendor Fuel Movement	Page 6
Quarterly Summary	Page 6

## General Description

The Cersosimo Lumber Co. is a manufacturer of hardwood and softwood lumber. As part of the manufacturing process lumber is dried in our kilns to provide a consistent, stable product to our customers. Our kilns are heated and humidified by steam produced in our biomass steam plant. The steam plant consists of 2 tandem, 100% wood fired, 600 HP, HRT boilers. Fuel for the boilers comes primarily from byproduct generated during the manufacturing process with some supplemental fuel purchased from log suppliers. The byproduct we produce and burn is sawdust and wood chips from the slabs, end trimmings, and edge trimmings of new lumber. The purchased fuel we burn comes from wood taken in the harvesting process which is not economically viable to produce lumber.

In 2012, the company installed a steam driven turbine, coupled to an 800 KW generator, in the steam process loop between the steam plant and the dry kilns. The steam generated by our steam plant is directed through the turbine at high pressure and exhausted into our steam distribution system at low pressure. The change in pressure and subsequently the reduction in BTU content of the steam is represented in the amount of energy the turbine extracted to produce electricity. Not all the energy used to produce steam is converted to electricity, however as much energy as is reasonably plausible is converted to electricity before the steam moves on for heat and humidity in our dry kilns. Generation of electricity is a byproduct of our operation, some of the fuel we burn is not used to generate electricity, therefore, it isn't possible to directly link the BTU content of the total fuel burned to the gross KWH of the generator. All the fuel we burn is a clean wood byproduct of our industry.

## Fuel Type Categories

For the purpose of this fuel source plan, fuel is separated into 3 categories. The first category is hardwood mill fuel. The second category is softwood mill fuel. The third category is vendor fuel.

### **Hardwood Mill Fuel**

Hardwood mill fuel is fuel derived from the production of hardwood lumber inside any of our five sawmills. It is 100% byproduct of our manufacturing process. It may contain both sawdust and chips from slabs and trimmings of hardwood logs. Hardwood fuel deliveries may be separated into two sub categories, direct deliveries and dumper fuel deliveries. Direct deliveries are those deliveries moved directly from the saw mill where the fuel was produced to the steam plant site in a live floor trailer. Dumper deliveries are those deliveries of fuel produced in our 3 most remote sawmills which was moved by a truck incapable of unloading itself. Dumper fuel deliveries are brought to our bark mulch division for unloading by a whole truck dumper then later loaded onto a live floor trailer for local delivery to the steam plant. The fuel characteristics are identical. Subcategorizing these fuels is for cost accounting purposes only.

### **Softwood Mill Fuel**

Softwood mill fuel is fuel derived from the production of softwood lumber inside any of our five sawmills. It is 100% byproduct of our manufacturing process. It may contain both sawdust and chips from slabs and trimmings of softwood logs. Softwood fuel deliveries may also be separated into two subcategories, direct deliveries and dumper fuel deliveries.

### **Vendor Fuel**

Vendor fuel is wood chip fuel we purchase from outside sources. Approved vendors selling fuel to us get this fuel from chipping tree tops, limbs and trimmings of logs harvested to produce lumber. All purchased vendor fuel is byproduct of forestry activities. This fuel may contain hardwood or softwood chips. This fuel does not typically contain saw dust.

## Mill Fuel

### **Direct Deliveries from Local Company Owned Mills**

Fuel deliveries from local mills are loaded onto a truck at the mill site. The percentage of chips and saw dust is estimated by the loader operator when the truck is loaded. Each load is given a delivery ticket. Each delivery ticket has a unique identification number on it and specific information about the load including the source, delivery site, type of fuel, (hardwood or softwood) and the weight. Each load of fuel is weighed by our company truck scale before the delivery is made. A copy of the scale ticket is attached to the delivery ticket. Drivers must submit tickets to the office at the end of each day.

### **Dumper Deliveries from Company Owned Mills**

Fuel deliveries from company owned mills that are not located in the area may or may not be moved by a truck with a live floor trailer. The live floor trailer enables the truck to self-unload. If so equipped, the truck can make a direct delivery and the documentation of the delivery is the same as documentation for local deliveries. If the truck is not equipped with a live floor trailer then it must deliver to our bark mulch division which is equipped to unload the truck. Fuel delivered to our bark mulch division may be stock piled at that location before it is moved to the steam plant. As a result, special documentation is required. Trucks picking up dumper fuel will use a delivery ticket and a scale ticket to document the volume, source, type of fuel, and destination of the fuel movement to the mulch division only. Once unloaded and stock piled, a new delivery ticket and scale ticket will be produced to document movement from the mulch division to the steam plant.

# Vendor Fuel

## **Supplier Approval**

Before a vendor can bring wood chip fuel for sale to us to be burned in our steam plant, they must first become an approved supplier. We do not purchase fuel from suppliers until they are approved. For a supplier to become approved, they must be actively engaged in the forest products industry and they must also already have a business relationship with our company. Typically, our suppliers of vendor wood chip fuel are loggers who already sell us logs. In addition to those requirements, anyone who wishes to sell us wood chips for fuel must complete an interview with the manager of our bark mulch division. During the interview, we will explain to perspective suppliers that we require clean wood only for fuel.

## **Vendor Fuel Deliveries**

Each time a load of wood chip fuel is received from a vendor, the delivery is unloaded at the company owned chip mill. Each delivery must be weighed on a company owned scale. A scale ticket will be produced for each load brought in. After unloading, the delivery is inspected by our staff. An employee of the company will inspect for signs of unacceptable fuel. This includes signs of painted, finished, or treated wood as well as the presence of hardware, foreign material, remnants of laminated material, and pieces showing the square edge associated with manufactured building products. Unacceptable loads will be refused. The employee will also look at the relative amounts of hardwood versus softwood and look for signs of disproportional amounts of bark as well as the presence of dirt. The employee's observations are documented on a special fuel inspection form. The inspection form contains information about each load received including the vendor name, product type, (hardwood, softwood, or mix) scale ticket number, and a visual description of the delivery. Scale tickets and inspection forms are turned into the office weekly.

## **Vendor Wood Chip Fuel Processing**

Each load of vendor wood chip fuel that is received and accepted is reprocessed through our tub grinder to eliminate small twigs from branch ends and large pieces that slipped past the vendors chipper. Large pieces and long twigs disrupt the fuel feed system at the steam plant. This step is not required for mill fuel which is processed to meet our needs inside our mills. This step requires vendor wood chip fuel to be clean wood since the same tub grinder is used to process high quality bark mulch.

## **Processed Vendor Wood Chip Fuel Movement**

Once vendor wood chip fuel has been processed, it is ready for final movement to the steam plant. This step is documented the same way direct deliveries and dumper fuel final deliveries are. Each load moved will have a new delivery ticket and scale ticket produced to document movements of vendor fuel to the steam plant.

## **Quarterly Summary**

At the end of each quarter, a summary of fuel delivered to the steam plant will be produced. The amount of fuel delivered to the steam plant is equal to the amount of fuel burned at the steam plant. Each statement will contain summarized information about the volume, in tons, of fuel delivered to the steam plant. Fuel volumes are separated by source to enable us to identify how much fuel, in tons, came from each supply source.

In addition to the quarterly report summarizing fuel volumes delivered by source, a second report will be produced to summarize the total volume, in tons, of vendor wood chip fuel received at our chip mill during the quarter. This summary will contain a breakdown of how much wood chip fuel was purchased from each approved supplier during the quarter. This information is not representative of how much vendor wood chip fuel was burned during the quarter. The amount of vendor wood chip fuel burned will be equal to the amount delivered to the steam plant and shown on the quarterly fuel delivery summary described above. The purpose of this summary is simply to track how much wood chip fuel was purchased from each approved supplier during the quarter.

**Cersosimo Lumber Co., Inc.**  
**FOREST PRODUCTS DELIVERY TICKET**

1103 Vernon Street  
 Brattleboro, VT 05301  
 802-254-4508

**137182**

Outside Trucker Name: \_\_\_\_\_

Date: 4/30/2018

**Destination** (circle all that apply)

Mill #1	Mill #3	Rumney	Sweet	Luzerne
Rutland	Peck Yard	Berlin	Berlin	Hartland
Other: <u>BKD</u>		Bethel	Bethel	Hardwick

Transfer  or **Log Sale from Yard**

**From:**

<input type="checkbox"/> Brattleboro Mill #1	<input type="checkbox"/> Brattleboro Mill #3
<input type="checkbox"/> Rumney	<input type="checkbox"/> Hardwick
<input type="checkbox"/> Hartland	<input checked="" type="checkbox"/> Peck Yard #35883
<input type="checkbox"/> Rutland	<input type="checkbox"/> Berlin 11.31
<input type="checkbox"/> Sweet	<input type="checkbox"/> Luzerne TONS
<b>Vendor:</b> <input type="checkbox"/>	<input type="checkbox"/> Bethel

Name: # 95820 - reground

Lot Name: WTC

Town/State: \_\_\_\_\_

Crew/Comment: 13.71

TON

**CLC Log Job:**

Logger Name: \_\_\_\_\_

Woodlot Name: \_\_\_\_\_

Town/State: \_\_\_\_\_

Crew/Comment: \_\_\_\_\_

**Load Description:** (check all that apply)

**Pulp**  **Chips**  **Bark**  **Sawdust**   
 Hemlock  **Hardwood**  **Pine**   Spruce

**Sawlogs**  WTC

<input type="checkbox"/> Pine	<input type="checkbox"/> Red Oak	<input type="checkbox"/> H. Maple
<input type="checkbox"/> S. Maple	<input type="checkbox"/> YB Birch	<input type="checkbox"/> Hemlock
<input type="checkbox"/> Ash	<input type="checkbox"/> Beech	<input type="checkbox"/> W. Oak
<input type="checkbox"/> Mixed Hardwood	<input type="checkbox"/> Other	

Driver Name: Bob

Truck # 163 Trailer # 283

CLC - WHITE / YELLOW TRUCKING - PINK / GOLD

THE WOOD BUSINESS SOLUTIONS 802.257.0630

**No. 95820**

CERSOSIMO LUMBER CO., INC.  
 1103 VERNON STREET  
 BRATTLEBORO, VT 05301-8615  
 (802) 254-4508

N. HARTLAND DRY KILN  
 6 DRY KILN ROAD  
 N. HARTLAND, VT 05652  
 (802) 296-7200

CERSOSIMO LUMBER CO., INC.  
 ROUTE 25  
 RUMNEY, NH 03266  
 (603) 786-9482

CLC CHIP MILL  
 63 PECK ROAD  
 VERNON, VT 05354  
 (802) 254-3654

FOR PULP ONLY:  
 STATE OF ORIGIN \_\_\_\_\_ COUNTY OF ORIGIN \_\_\_\_\_

FSC # \_\_\_\_\_  
 (IF APPLICABLE)

LOT NAME: \_\_\_\_\_

COMMODITY: Reground - Vendor

RUCKER: CLC 163

SELLER  
 BUYER

BKD

ADDRESS \_\_\_\_\_

CITY \_\_\_\_\_

STATE \_\_\_\_\_

ZIP \_\_\_\_\_

DATE 4/30/2018

GROSS 87190 1b  
 TARE 59760 1b  
 NET 27420 1b

ID 20

GROSS  
 TARE  
 NET

13.71 TONS

TONS  
 LBS  
 LBS

BRATTLEBORO VT 05301  
 TEL 802-254-4508  
 FORESTRY SCALE TICKET  
 Date: 4/30/2018  
 Ticket Number: 35883  
 Top Ticket: 137182  
 Lot Number: \_\_\_\_\_  
 Lot Name: B\_K\_D  
 Lot Number: \_\_\_\_\_  
 River Name: CLC\_163  
 County: WINDHAM  
 State: VT  
 FSC: SGNR-Cut-5889  
 Time in: 6:19:09 AM  
 Time out: 6:58:36 AM  
 Lot Number: CPI  
 Lot Name: Pine Chips  
 Weight empty: 37140  
 Weight loaded: 59760  
 Net weight: 1131

SIGNATURE  
 CUSTOMER COPY

**Cersosimo Lumber Co., Inc.**  
1103 Vernon St., Brattleboro, VT 05301-8615

802-254-4508 - PHONE  
802-254-5691 - FAX

By-product Delivery Ticket

No. H 67986 Date 5/11/18

**Source:**

Brattleboro

Mill #1 17.44

Mill #8 10.05

Pine Products

Rumney

Luzerne, NY

Warrensburg, NY

Chip mill

VT Mulch

Vendor 15.07

Destination: BKD TOW

50% SWC 50% Regrind

Trucker: 175

Loader: ANC / BOB

Received by: \_\_\_\_\_

(CLC - white) (Copy - yellow) (Trucker - pink) (Customer - G-Rod)

No. 95055

DATE 5/11/18

CERSOSIMO LUMBER CO., INC.  
1103 VERNON STREET  
BRATTLEBORO, VT 05301-8615  
(802) 254-4508

N. HARTLAND DRY KILN  
6 DRY KILN ROAD  
N. HARTLAND, VT 05352  
(802) 296-7200

SELLER

BUYER BOB

CERSOSIMO LUMBER CO., INC.  
ROUTE 25  
RUMNEY, NH 03266  
(603) 786-9482

CLC CHIP MILL  
63 PECK ROAD  
VERNON, VT 05354  
(802) 254-9654

ADDRESS

\_\_\_\_\_

CITY

\_\_\_\_\_

STATE

ZIP

FOR PULP ONLY:  
STATE OF ORIGIN \_\_\_\_\_

COUNTY OF ORIGIN \_\_\_\_\_

FSC # \_\_\_\_\_  
(IF APPLICABLE)

67986

15.07 tons Regrind - Vendor  
17.114 tons Ring Mills  
net

GROSS

TARE

NET

Vendor

COMMODITY:

Regrind - WTC

NET 15.07

NET 17.114

TARE 39.00

TRUCKER:

175

NET 17.114

DRIVER ON

OFF

WEIGHED BY

ANC

DIGITAL WEIGHT INDICATOR & PRINTER

No. 95849

DATE 5-10-18

CEROSIMO LUMBER CO., INC.  
1103 VERNON STREET  
BRATTLEBORO, VT 05301-8615  
(802) 254-4508

N. HARTLAND DRY KILN  
6 DRY KILN ROAD  
N. HARTLAND, VT 05052  
(802) 286-7200

SELLER   
BUYER

ANDERSON TIMBER HARVESTING

CEROSIMO LUMBER CO., INC.  
ROUTE 25  
RUMNEY, NH 03286  
(603) 786-9482

CIG CHIP MILL  
63 PECK ROAD  
VERNON, VT 05354  
(802) 254-3654

ADDRESS  
CITY WESTMINSTER

WOODS RD

STATE VT ZIP

FOR PULP ONLY:  
STATE OF ORIGIN

COUNTY OF ORIGIN

FSC #  
(IF APPLICABLE)

10:1281 05/10/2018

104540 LB

GROSS

LOT NAME:

GREEN FIELDS LUNDLOW

10:4291 05/10/2018

40200 LB

TARE

COMMODITY:

HARDWOOD CHIPS TOPS

NET

TRUCKER:

ANDERSON TIMBER

# 16

32.17  
TOPS

DRIVER ON

OFF

WEIGHED BY

MIKE P.

DIGITAL WEIGHT INDICATOR & PRINTER

FORM 510

Date: 5/22/18  
Time: 10:31:09

Corsosimo Lumber Company  
Item Sales by Calendar Month  
From 4/01/18 To 4/28/18

Item#  
TO 999999999

Item #	Description	Destination	U/M	April	Total
01CHPD	DUMPER CHIPS	CLC BOILER	(N ) (\$)	198.38	198.38
		CLC BOILERS	(N ) (\$)	21.00	21.00
		01CHPD	(N ) (\$)	219.38	219.38
		Total			
01CHPN	HARDWOOD CHIPS	CLC BOILER	(N ) (\$)	10.87	10.87
		CLC BOILERS	(N ) (\$)	121.96	121.96
		01CHPN	(N ) (\$)	132.83	132.83
		Total			
01CHPP	PURCHASED CHIP	CLC BOILER	(N ) (\$)	453.61	453.61
		01CHPP	(N ) (\$)	453.61	453.61
		Total			
01SDGT	HARDWOOD GREEN	CLC BOILER	(N ) (\$)	86.98	86.98
		CLC BOILERS	(N ) (\$)	209.19	209.19
		01SDGT	(N ) (\$)	296.18	296.18
		Total			
15CHPS	SOFTWOOD CHIPS	CLC BOILERS	(N ) (\$)	81.00	81.00
		15CHPS	(N ) (\$)	81.00	81.00
		Total			
15SDGT	SOFTWOOD GREEN	CLC BOILER	(N ) (\$)	13.24	13.24
		CLC BOILERS	(N ) (\$)	32.06	32.06
		15SDGT	(N ) (\$)	45.30	45.30
		Total			
		Report Total (TR)		1228.31	1228.31

Tons

1228.31  
Total  
Reported

## INCOMING FUEL CHIPS

Week of: 10-23-17

LOAD#	VENDOR	SPECIES MIX	TICKET NUMBER	TONS	VISUAL DESCRIPTION
10/23 <sub>1</sub>	Goodman	mix	95407 11 AM	28.73	Good whole tree
10/24 <sub>2</sub>	P.J.F	MIX	95408 8:15	31.63	Good 90 HW - 10 HW
10/24 <sub>3</sub>	Goodman	MIX	95409 10:15	30.78	Good 90 HW - 10 HW
10/24 <sub>4</sub>	Branch Flower	Pine	95410 11:45	26.53	Good 100 Pine
10/24 <sub>5</sub>	Branch Flower	HW	95411 12:15	30.08	Good 100 HW
10/24 <sub>6</sub>	Goodman	mix	95412 1:45	31.04	Good 90 HW - 10 HW
10/24 <sub>7</sub>	Branch Flower	MIX	95413 4:00	26.86	Good 50 HW 50 SW
10/24 <sub>8</sub>	Branch Flower	HW	95414 4:45	29.38	Good 100 HW
10-25 <sub>9</sub>	P.J.F	HW	#95415 7:00	31.34	Good 100 - HW
10-26 <sub>10</sub>	Branch Flower	Pine	#95416 10:30	25.69	Good 100 Pine
10/26 <sub>11</sub>	Branch Flower	Pine	#95417 1:30	27.00	Good 100 Pine
10/26 <sub>12</sub>	Branch Flower	MIX	#95418 3:30	26.91	Good 90 HW 10 Pine
10-27 <sub>13</sub>	Branch Flower	MIX	#95419 12:45	26.96	Good 100 HW
10-27 <sub>14</sub>	Goodman	HW	#95420 1:30	28.02	Good
10/27 <sub>15</sub>	Branch Flower	MIX	#95422 1:50	29.20	Good
10/27 <sub>16</sub>	Branch Flower	Pine	#95423 4:00	25.49	100 Pine TOOK TO CLE BOW
17					
18					
19					
20					

#AOP-12-039

DEC#NS87-0017

Operating Permit Expiration Date: July 5<sup>th</sup>, 2021

State of Vermont  
Agency of Natural Resources  
Department of Environmental Conservation



Air Quality & Climate Division  
Montpelier, Vermont

**AIR POLLUTION CONTROL PERMIT**  
**TO CONSTRUCT AND OPERATE**

Date Permit Issued: July 5<sup>th</sup>, 2016

Owner/Operator: Cersosimo Lumber Company, Inc.  
1103 Vernon Street  
Brattleboro, Vermont 05301-8615

Source: Sawmill and Kiln Drying  
Cersosimo Lumber Company, Inc.  
Brattleboro Kiln Dry Division  
46 Frost Street  
Brattleboro, Vermont 05301

**FINDINGS OF FACT**

(A) FACILITY DESCRIPTION

Cersosimo Lumber Company, Inc. (also referred to herein as "Permittee") owns and operates a sawmill with kiln drying on Frost Street in the town of Brattleboro, Vermont (also referred to herein as "Facility"). Upon issuance of this Permit, the approved regulated operations at the Facility include the following air pollution related operations, equipment and emission control devices:

Equipment Specifications Combustion Equipment			
Unit	Capacity <sup>1</sup> MMBTU/hr max heat input hp max heat output	Fuel Type	Date of Installation
IBC Modul-Pak Wood-Fired Boiler Model WWF-600-250	30.2 MMBTU/hr 600 hp Fire box heating surface area: 3,380 ft <sup>2</sup>	Wet Wood >20% MC	1988
Steam Turbine	450 kW @ 20,000 lb/hr steam	Excess Steam from Boilers	1988
Cleaver Brooks CB600 Fuel Oil Boiler (Backup Boiler)	20.9 MMBTU/hr	No. 6 Fuel Oil 2% sulfur	1973
Wood Waste Handling Equipment			
Wood Waste Handling Operation	Air Flow (acfm)	Unit Description/Specification	
Two (2) Multicyclones operated with the IBC Wood Boiler	9,167	The wood boiler is equipped with a pneumatic spreader stoker and two multicyclones in series. Flyash from the first multiclone is reinjected into the boiler, while the flyash from the second is dropped through a rotary air lock to a storage drum which requires emptying approximately every 2 to 3 days.	
Wood Drying Kilns			
Unit Description	Unit Capacity	Date of Installation	
Twelve (12) Steam Heated Wood Drying Kilns	800,000 BF combined capacity.	Various Install Dates	

<sup>1</sup> MMBTU/hr - Million British Thermal Units per hour maximum rated heat input. hp - Boiler horsepower maximum rated heat output as specified by manufacturer. BF - Board Feet total combined capacity of all kilns, per batch.

(B) FACILITY CLASSIFICATION

The Facility is classified as a source of air contaminants pursuant to Title 10 of the *Vermont Statutes Annotated* ("10 VSA") §555 and §5-401(6)(a) [Fossil Fuel burning equipment] and §5-401(6)(b) [Wood fuel burning equipment] and §5-401(4) [Wood Products Industries] of the *Vermont Air Pollution Control Regulations* (hereinafter "*Regulations*"). In addition, §5-101 of the *Regulations* defines a *stationary source* as any structure(s), equipment, installation(s), or operation(s), or combination thereof, which emit or may emit any air contaminant, which is located on one or more contiguous or adjacent properties and which is owned or operated by the same person or persons under common control. Based on this definition, all of the equipment, operations, and structures at the Facility are grouped together by the Agency of Natural Resources, Department of Environmental Conservation, Air Quality & Climate Division (hereinafter "Agency") as one stationary air contaminant source for purposes of review under the *Regulations*.

(C) PRIOR AGENCY ACTIONS/APPROVALS

The Facility has been issued the following "Permit to Construct" approvals pursuant to 10 VSA §556 and §5-501 and/or 5-502 of the *Regulations* and the following "Permit to Operate" approvals pursuant to 10 VSA §556a and Subchapter X of the *Regulations*.

Prior Agency Permit Approvals and Actions	
Date of Action	Description of Agency Approval/Action
April 18, 1988	#AP-88-003 -- Initial Agency "Permit to Construct" approval for the Facility to replace the existing 300 hp Dillon Wood-Fired Boiler with a 30.2 MMBtu/hr (600 hp) IBC Modul-Pak Wood-Fired Boiler. MSER established for CO and PM.
December 16, 1988	#AP-88-034 -- Amendment to "Permit to Construct" to add a steam turbine to the existing wood-fired boiler and extend the stack test deadline.
November 5, 1998	#AOP-98-014 -- Initial Agency "Permit to Operate" approval to operate the 30.2 MMBtu/hr IBC Wood-Fired Boiler and a 20.9 MMBtu/hr Cleaver Brooks No. 6 Fuel Oil Backup Boiler. Wood-Fired Boiler PM Emissions limit changed from 0.10 gr/dscf to 0.14 gr/dscf.
December 10, 2007	#AOP-05-036 -- Combined construction and operating permit restricting fuel use in the 30.2 MMBtu/hr IBC wood-fired boiler and the 20.9 MMBtu/hr Cleaver Brooks No.6 oil-fired boiler. It also set the CO limit for the 30.2 MMBtu/hr IBC wood-fired boiler to 0.30 lbs/MMBtu.

(D) FACILITY PERMIT APPLICABILITY

As noted above, the Facility is classified as a source of air contaminants under §5-401 of the *Regulations*. Pursuant to 10 VSA §556a and Subchapter X of the *Regulations* a Permit to Operate is required for any air contaminant source with allowable emissions of all air contaminants combined of ten (10) tons per year ("tpy") or more or that is otherwise subject to Title 40 *Code of Federal Regulations* ("40 CFR") Part 70.

The Facility currently operates under a Permit to Construct and Operate issued on December 10, 2007. The allowable emissions from the Facility are estimated to be greater than ten (10) tpy but each pollutant is less than the threshold for applicability to Title V of the federal Clean Air Act. Therefore, pursuant to §§5-1002, 5-1003, and 5-1005 of the *Regulations* the Facility is classified as a "Subchapter X Major Source". In accordance with §5-1009 of the *Regulations*, the agency is issuing the Permit to Operate herein as a renewal of the previous Permit to Operate for the Facility and the Permit herein supersedes all prior Permits for the Facility.

The allowable emissions for the Facility are summarized below:

Future Allowable Air Contaminant Emissions (tons/year) <sup>1</sup>					
PM/PM <sub>10</sub> /PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOCs	HAPs <sup>2</sup>
23.0	21.1	16.5	18.1	28.5	<10/25

<sup>1</sup> PM/PM<sub>10</sub>/PM<sub>2.5</sub> - particulate matter, particulate matter of 10 micrometers in size or smaller and particulate matter of 2.5 micrometers in size or smaller, respectively (unless otherwise specified, all PM is assumed to be PM<sub>10</sub> and PM<sub>2.5</sub>); SO<sub>2</sub> - sulfur dioxide; NO<sub>x</sub> - oxides of nitrogen measured as NO<sub>2</sub> equivalent; CO - carbon monoxide; VOCs - volatile organic compounds; HAPs - hazardous air pollutants as defined in §112 of the federal Clean Air Act.

<sup>2</sup> Emissions of individual HAPs each < 10 tpy and emissions of total HAPs combined <25 tpy. Actual total combined HAPs estimated at <3 tpy.

<sup>3</sup> Commencing July 1, 2018 the allowed sulfur content of No.6 fuel will decrease to 0.5% which will reduce allowable SO<sub>2</sub> emissions to 6.4 tons per year and PM emissions to 22.1 tons per year.

(E) REVIEW OF CRITERIA POLLUTANT EMISSIONS FOR THE PERMIT TO CONSTRUCT

(a) New Source Review Designation

The Permittee has not proposed any modifications to the Facility in conjunction with the review for this Permit to Operate and therefore is not subject to review under the New Source Review requirements in §5-501 or §5-502 of the *Regulations* at this time.

(b) Most Stringent Emission Rate

Pursuant to §5-502 of the *Regulations*, the owner/operator of each new major stationary source or major modification must apply control technology adequate to achieve the Most Stringent Emission Rate ("MSER") with respect to those air contaminants for which there would be a major or significant actual emissions increase, respectively, but only for those currently proposed physical or operational changes which would contribute to the increased emissions.

The Permittee has not proposed any modifications to the Facility in conjunction with the review for this Permit to Operate and therefore is not subject to review under the MSER requirements in §5-502 of the *Regulations* at this time.

The Facility was previously reviewed under §5-502 of the *Regulations* for modifications to the Facility approved December 16, 1988. The modifications to the Facility included the installation of the 30.2 MMBtu/hr IBC wood-fired boiler. The modification was determined to be major for the pollutant PM. The following MSER determinations have been made at this Facility:

Most Stringent Emission Rate Determinations		
Date of Determination Permit #	Pollutant	Description/Emission Limit
April 18, 1988 #AP-88-034	CO	MSER was applied to the 30.2 MMBtu/hr IBC Modul-Pak wood-fired boiler. The emission limit of 0.30 lbs/MMBtu was established.
	PM	MSER was applied to the 30.2 MMBtu/hr IBC Modul-Pak wood-fired boiler. The emission limit of 0.10 gr/dscf, corrected to 12% CO <sub>2</sub> , was established. Emissions testing later determined this emission limit to be unachievable on a consistent basis and was amended to 0.14 gr/dscf.

(c) Ambient Air Quality Impact Evaluation

An ambient air quality impact evaluation is performed to demonstrate whether or not a proposed project will cause or contribute to violations of the ambient air quality standards and/or significantly deteriorate existing air quality.

The Permittee has not proposed any modifications to the Facility in conjunction with the review for this Permit to Operate and therefore is not subject to an air quality impact analysis under §5-501 of the *Regulations* at this time. In addition, there have been no prior ambient air quality impact evaluations conducted for any of the previous modifications to the Facility.

(F) REVIEW OF CRITERIA POLLUTANT EMISSIONS FOR THE PERMIT TO OPERATE

(a) Applicable Requirements

The operations at the Facility are subject to the following state and federal laws and regulations, the requirements of which are embodied in the conditions of this Permit.

(i) Vermont Air Pollution Control Regulations:

Applicable Requirements from the Vermont Air Pollution Control Regulations
Section 5-201 – Prohibition of Open Burning
Section 5-211(2) - Prohibition of Visible Air Contaminants, Installations Constructed Subsequent to April 30, 1970.
Section 5-211(3) - Prohibition of Visible Air Contaminants, Exceptions Wood Fuel Burning Equipment.
Section 5-221(1) - Prohibition of Potentially Polluting Materials in Fuel, Sulfur Limitation in Fuel.
Section 5-231(3) - Prohibition of Particulate Matter; Combustion Contaminants.
Section 5-231(4) - Prohibition of Particulate Matter; Fugitive Particulate Matter.
Section 5-241 – Prohibition of Nuisance and Odor.
Section 5-402 – Written Reports When Requested.
Section 5-403 – Circumvention.
Section 5-404 – Methods for Sampling and Testing of Sources.
Section 5-405 – Required Air Monitoring.
Subchapter VIII – Registration of Air Contaminant Sources.
Subchapter X – Operating Permits.

(ii) Reasonably Available Control Technology - §5-1010 of the *Regulations*

Pursuant to 10 VSA §556a(d) and §5-1010 of the *Regulations* the Agency may establish and include within any Permit to Operate emission control requirements based on Reasonably Available Control Technology ("RACT"). Based on the Facility's existing levels of emissions and emission controls, the Agency has not imposed any further requirements on this Facility under this authority at this time.

(iii) Existing Air Pollution Control Permit to Construct and/or Operate

The Facility currently operates under the confines of a Permit to Construct and Operate issued on December 10, 2007 (#AOP-05-036). The conditions within that existing permit are considered applicable requirements pursuant to §5-1002 of the *Regulations*. The requirements of that permit which are not being modified herein are incorporated into this new combined Permit to Construct and Operate (#AOP-12-039).

(iv) Federal Requirements:

<b>Applicable Requirements from Federal Regulations and the Clean Air Act</b>
<p>40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial- Institutional Steam Generating Units. Applies to all boilers 10 MMBTU/hr or greater manufactured after June 9, 1989. Units larger than 30 MMBTU per hour installed after February 27, 2005 are subject to additional particulate matter requirements.</p> <p><i>The Cleaver Brooks 20.9 MMBtu No. 6 fuel oil fired boiler and the IBC 30.2 MMBtu wood-fired boiler were both manufactured/installed before June 9, 1989 and therefore are not subject to this rule.</i></p>
<p>40 CFR Part 63, Subpart JJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers. Applies to new and existing fuel oil and solid fuel fired boilers located at area sources (major sources are subject to Subpart DDDDD). Natural gas or propane fired boilers are not subject. This gas exemption allows use of backup fuel during gas curtailments and up to 48 hours of elective use. Oil fired hot water boilers less than 1.6 MMBTU/hr are not subject. The rule requires a tune-up for each boiler once every two years except boilers with oxygen trim and oil boilers less than 5 MMBTU/hr must conduct tune-ups every five years. New boilers greater than 10 MMBTU/hr are subject to PM emission limits. Boilers that commenced construction on or before June 4, 2010 are considered an existing source.</p> <p><i>Since Vermont has not taken delegation of this federal regulation, the U.S. EPA is the implementing authority and is responsible for determining applicability of this regulation. Subpart JJJJJ is anticipated to apply to the Cleaver Brooks 20.9MMBtu/hr and the IBC 30.2 MMBtu/hr boilers at the Facility. Since the Facility is not a major source of HAPs, the Facility is not subject to Subpart DDDDD.</i></p>

(b) Non-Applicable Requirements

Pursuant to §5-1015(a)(14) of the *Regulations*, an owner or operator of a Facility may request a permit shield from specific state or federally enforceable regulations and standards which are not applicable to the source. The applicant has not requested such a permit shield in accordance with the requirements of §5-1015(a)(14) of the *Regulations*.

(G) CONTROL OF HAZARDOUS AIR CONTAMINANTS

Pursuant to §5-261 of the *Regulations*, any stationary source subject to the rule<sup>1</sup> with current or proposed actual emissions of a hazardous air contaminant (HAC) equal to or greater than the respective Action Level (found in Appendix C of the *Regulations*) shall be subject to the Regulation and shall achieve the Hazardous Most Stringent Emission Rate (HMSEER) for the respective HAC. HMSEER is defined as a rate of emissions which the Secretary, on a case-by-case basis, determines is achievable for a stationary source based on the lowest emission rate achieved in practice by such a category of source and considering economic impact and cost. HMSEER may be achieved through application of pollution control equipment, production processes or techniques, equipment design, work practices, chemical substitution, or innovative pollution control techniques.

Based on information provided by the Permittee, the Agency does not anticipate the Facility to have regulated emissions of any HAC in excess of an Action Level. Therefore, the Facility is not being reviewed pursuant to §5-261 of the *Regulations* at this time.

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<sup>1</sup> APCR §5-261(1)(c)(ii) provides that solid fuel burning equipment (not including incinerators) installed or constructed prior to January 1, 1993, and all fuel burning equipment which combust virgin liquid or gaseous fuel shall not be subjects to the requirements of §5-261.

Based on the Agency's review of the Facility's application and the above Findings of Fact, the Agency concludes that the Facility, subject to the following Permit conditions, complies with all applicable state and federal air pollution control laws and regulations or is subject to an acceptable schedule of compliance. Therefore, pursuant to 10 V.S.A. §§556 and 556a, as amended, the Agency hereby issues a Permit approving the Facility, as described in the above Findings of Fact, subject to the following:

### PERMIT CONDITIONS

#### - Construction and Equipment Specifications -

- (1) The Permittee shall construct and operate the Facility in accordance with the plans and specifications submitted to the Agency and in accordance with the conditions set forth herein, including the equipment specifications as listed in Findings of Fact (A) or their equivalent as approved by the Agency. [10 V.S.A. §§556(c) and 556a(d)] [§5-501(1) of the *Regulations*]
- (2) The IBC 30.2 MMBtu/hr wood-fired boiler and the Cleaver Brooks 20.9 MMBtu/hr backup oil-fired boiler shall not operate concurrently except for short periods of time when transferring steam loads from one boiler to the other. [10 V.S.A. §§556(c) and 556a(d)] [Permit #AP-87-003]
- (3) The Permittee shall control emissions from the wood fired boiler with two (2) multiclone particulate matter emission control units arranged in series. Flyash collected from the first multiclone may be reinjected. Flyash from the second multiclone must be properly disposed of. All elements of this air pollution control system shall be maintained in good working order at all times and operated in accordance with the manufacturer's operation and maintenance recommendations. The air pollution control system shall be in operation whenever the respective emission source is in operation. [10 V.S.A. §§556(c) and 556a(d)] [§5-1015(a)(1), (3) and (4) of the *Regulations*] [Permit #AP-87-003]
- (4) Stack heights: The exhaust gases from the 30.2 MMBtu/hr IBC wood-fired boiler shall be vented vertically through a stack which extends a minimum of one-hundred (100) feet above the stack base grade elevation and a has a maximum diameter of forty (40) inches. The stack shall not be equipped with any device that may obstruct the upward discharge of the exhaust gases such as a fixed rain cap of a type that has not been approved by the Agency.

For all other non-fugitive emission points at the Facility, the Agency recommends that they each be exhausted vertically through a stack(s) which extend a minimum of four (4) feet above the roof where the stack penetrates the roof and that they not be equipped with any device that may obstruct the upward discharge of the exhaust gases such as a fixed rain cap of a type that has not been approved by the Agency. The Agency may require the Permittee to increase the stack height, remove a rain cap, or conduct a dispersion analysis to verify compliance with ambient air quality standards for any stack at the Facility if, in the judgment of the Agency, adequate dispersion cannot be maintained at the current stack configuration. Adequacy may in part be based on the actual emission rate of air

contaminants, the characteristics of the current stack configuration, or inspections of the Facility that indicate poor dispersion or that confirm significant visible emissions or nuisance or odor beyond the property line. [10 V.S.A. §§556(c) and 556a(d)] [§5-406 of the *Regulations*] [Permit #AOP-98-014]

**- Operational Limitations -**

- (5) Fuel Consumption: The annual quantity of material processed through the equipment listed below shall not exceed the following limitations:

Annual Fuel Limitation		
Equipment	Annual Limit	Fuel Type
IBC Wood-Fired Boiler	11,000 tons	Wood Fuel >20% moisture
Cleaver Brooks Oil-Fired Boiler	125,000 gallons	No. 6 Fuel Oil; 2% Sulfur by Weight

[10 V.S.A. §§556(c) and 556a(d)] [#AOP-98-014] [#AP-88-034]

- (6) Wood Boiler: The Permittee shall operate the wood fired boilers at optimum combustion efficiency by, at a minimum, ensuring the proper amounts of combustion air are continuously provided to the boilers and by operating the boilers in accordance with the O&M Plan required by this Permit. The Permittee shall also assure that at least one employee who has received instruction in the proper operation and monitoring of the boilers to achieve optimum combustion efficiency is present or on call whenever one or more of the wood fired boilers are in operation. [10 V.S.A. §§556(c) and 556a(d)] [§5-1015(a)(3) and (4) of the *Regulations*]
- (7) Wood Boiler: Only natural wood as defined in the *Regulations*, as well as sawdust or other wood waste generated by wood processing operations, may be used as fuel in the wood fuel burning equipment without the prior written approval of the Agency. In addition, the wood fuel burning equipment shall only be used when there is a need for space or process heat and shall not be used as an *incinerator* where the primary purpose is the reduction in volume and/or weight of an unwanted material. [10 V.S.A. §§556(c) and 556a(d)] [§§5-101, 5-231(2) and 5-1015(a)(1) of the *Regulations*]
- (8) Oil Boiler: Only No. 6 fuel oil or lighter grade fuel oils with a maximum sulfur content not to exceed 2.0 percent by weight may be used as fuel in the Cleaver Brooks 20.9 MMBtu/hr oil-fired backup boiler unless the Permittee obtains prior written approval from the Agency to use another type of fuel.

Commencing on July 1, 2018, the sulfur content of No.2 and lighter distillate oils shall not exceed 0.0015 percent by weight. Commencing on July 1, 2018, the sulfur content of No.4 residual oil and No.5/No.6 residual fuel oil shall not exceed 0.25 percent and 0.5 percent by weight, respectively. [10 V.S.A. §§556(c) and 556a(d)] [§§5-501 and 5-1015(a)(1) of the *Regulations*] [§5-221(1)(a) of the *Regulations*] [#AOP-05-036]

- (9) Solvent Metal Cleaning: The Permittee shall operate the cold, solvent metal cleaning units (parts cleaners) in accordance with the following requirements and shall only use a solvent with a vapor pressure equal to or less than 0.3 pounds per square inch measured at 100°F, which includes but is not limited to the Safety-Kleen 105 hydrocarbon solvent. Prior to the Permittee using any solvent with a maximum true vapor pressure greater than 0.3 psi or using a solvent that is heated, the Permittee shall notify the Agency and comply with any additional applicable requirements of §5-253.14 of the *Regulations*.
- (a) Provide a permanent, legible, conspicuous label, summarizing the operating requirements;
  - (b) Store waste solvent in covered containers;
  - (c) Close the cover whenever parts are not being handled in the cleaner;
  - (d) Drain the cleaned parts until dripping ceases;
  - (e) Supply a solvent spray, if used, that ensures a solid fluid stream at a pressure that does not exceed ten (10) pounds per square inch gauge;
  - (f) Degrease only materials that are neither porous nor absorbent; and
  - (g) Cease operation of the unit upon the detection of any visible solvent leak until such solvent leak is repaired.

[10 V.S.A. §§556(c) and 556a(d)] [§5-253.14 of the *Regulations*]

- (10) Engines: The Permittee shall not install or operate a stationary reciprocating internal combustion engine, as defined in the *Regulations*, unless the engine complies with §5-271 of the *Regulations* as may be applicable. All engines, including emergency generators/engines, installed on or after July 1, 2007 must comply with the applicable emission standards (Tier 2) of §5-271 immediately upon installation. Installation of any size engine, even those below 450 bhp, may still require approval from the Agency in the form of an amended permit prior to installation. [10 V.S.A. §§556(c) and 556a(d)] [§§5-271 and 5-501 of the *Regulations*]
- (11) Open Burning: Open burning is prohibited except as provided for in §5-202 of the *Regulations*. Prior to conducting open burning of any material, other than leaves, brush, or tree cuttings from normal grounds maintenance, the Permittee shall contact the Air Pollution Control Officer and obtain approval for such burning, if required. [10 V.S.A. §§556(c) and 556a(d)] [§5-202 of the *Regulations*]

- Emission Limitations -

- (12) Boilers: Emissions of particulate matter and carbon monoxide from the wood and oil-fired boilers shall not exceed the following limits:

Equipment	Pollutant	Emission Limitation <sup>1</sup>		Reference Method
IBC Wood-Fired Boiler	PM	0.14 gr/dscf	4.9 lb/hr	5, 202
	CO	0.30 lb/MMBtu	9.1 lb/hr	10
Cleaver Brooks Oil-Fired Boiler	PM	0.35 lb/MMBtu	7.4 lb/hr	5, 202

<sup>1</sup> gr/dscf equal grains of pollutant emitted per dry standard cubic foot of exhaust gas corrected to 12% CO<sub>2</sub>. lb/MMBtu equals pounds of pollutant emitted per hour per million British Thermal Units of heat input. lb/hr equals pounds of pollutant/hour.

Any emission testing conducted to demonstrate compliance with the above emission limits shall be performed in accordance with the methods noted above and found in 40 CFR Part 60, Appendix A, and Part 51, Appendix M, or an equivalent method approved in writing by the Agency. [10 V.S.A. §§556(c) and 556a(d)] [§§5-231, 5-261, and 5-404 of the Regulations] [Permit #AOP-98-014]

- (13) Visible Emissions [Facility Wide]: Emissions of visible air contaminants from any installation at the Facility, except where otherwise noted in this Permit, shall not exceed twenty (20) percent opacity for more than a period or periods aggregating six (6) minutes in any hour and at no time shall visible emissions exceed sixty (60) percent opacity. For wood fuel burning equipment, the exceptions as provided in paragraphs (a) and (b) of this condition shall apply.

- (a) During normal startup operations of the wood fuel burning equipment, emissions of visible air contaminants in excess of the limits specified above may be allowed for a period not to exceed one (1) hour; however, at no time shall such emissions exceed eighty (80) percent opacity.
- (b) During normal soot blowing operations of the wood fuel burning equipment, emissions of visible air contaminants in excess of the limits specified above may be allowed for a period not to exceed thirty (30) minutes during any twenty-four (24) hour period; however, at no time shall such emissions exceed eighty (80) percent opacity.

Any emission testing conducted to demonstrate compliance with the above emission limits shall be performed in accordance with 40 CFR Part 51, Appendix M, Methods 203B and 203C, respectively, or equivalent methods approved in writing by the Agency. [10 V.S.A. §§556(c) and 556a(d)] [§§5-211(2), 5-211(3) and 5-404 of the Regulations]

- (14) Volatile Organic Compounds: Emissions of volatile organic compounds from the Facility shall not equal or exceed twenty-nine (29) tons per calendar year without the prior written approval of the Agency. [10 V.S.A. §§556(c) and 556a(d)] [application for #AOP-12-039]
- (15) Hazardous Air Pollutants: Emission of federally regulated hazardous air pollutants (HAPs) from the Facility shall not equal or exceed ten (10) tons per year of any single HAP or twenty-five (25) tons per year of all HAPs combined per calendar year. [40 CFR Part 63]
- (16) Hazardous Air Contaminants: Emissions of state hazardous air contaminants (HACs) from the applicable operations at the Facility shall not equal or exceed their respective Action Level (found in Appendix C of the *Regulations*) unless the Agency has reviewed and approved such HAC emission under §5-261(2) of the *Regulations*. [10 V.S.A. §§556(c) and 556a(d)] [§5-261 of the *Regulations*]
- (17) Fugitive Particulate Matter Emissions: The Permittee shall take reasonable precautions at all times to control and minimize emissions of fugitive particulate matter from the operations at the Facility. This shall include but not be limited to taking precautions to prevent fugitive particulate matter during the handling and disposal of the wood ash collected from the wood burning operations. [10 V.S.A. §§556(c) and 556a(d)] [§5-231(4) of the *Regulations*]
- (18) Nuisance and Odor: The Permittee shall not discharge, cause, suffer, allow, or permit from any source whatsoever such quantities of air contaminants or other material which will cause injury, detriment, nuisance or annoyance to any considerable number of people or to the public or which endangers the comfort, repose, health or safety of any such persons or the public or which causes or has a natural tendency to cause injury or damage to business or property. The Permittee shall not discharge, cause, suffer, allow, or permit any emissions of objectionable odors beyond the property line of the premises. [10 V.S.A. §§556(c) and 556a(d)] [§5-241(1) and (2) of the *Regulations*]

**- Compliance Testing and Monitoring -**

- (19) Wood Boiler Combustion Efficiency: The Permittee shall perform combustion efficiency (CE) testing of the IBC wood-fired boiler by measuring the concentrations of carbon dioxide (CO<sub>2</sub>) and carbon monoxide (CO) in the exhaust gases.
- (a) Said testing shall be monthly at a minimum;
  - (b) The Permittee shall perform said testing of the CO<sub>2</sub> and CO concentrations using methods which have been approved in writing in advance by the Agency. The CO<sub>2</sub> and CO concentrations may be on a wet or dry basis as long as they are both on the same basis;
  - (c) Any instruments and/or equipment used for said testing shall be calibrated and maintained in accordance with the manufacturer's recommendations;
  - (d) Each time testing of the boiler exhaust gas is conducted to determine the concentrations of CO<sub>2</sub> and CO, the Permittee shall calculate and record the combustion efficiency of the boiler using methods approved in writing in advance by the Agency; and

- (e) For the purposes of this Permit combustion efficiency shall be determined using the following equation:

$$CE(\%) = \frac{CO_2}{CO_2 + CO} \times 100$$

Where;

CE = Combustion efficiency,  
CO<sub>2</sub> = % by volume of carbon dioxide in the flue gas, and  
CO = % by volume of carbon monoxide in the flue gas.

[10 V.S.A. §§556(c) and 556a(d)] [§§5-404(1), 5-405(1) and 5-1015(a)(3) and (4) of the *Regulations*] [#AOP-05-036]

- (20) Operation and Maintenance Plan – Wood Boiler: The Permittee shall develop, maintain and implement an operation and maintenance plan (O&M Plan) for the IBC wood-fired boiler. The purpose of said O&M Plan shall be to ensure the proper operation and maintenance of the boiler in order to ensure optimum performance and continuous compliance with the respective conditions and emission limits of this Permit. Additionally the O&M Plan shall help ensure good control of carbon monoxide emissions. The O&M Plan shall include, but not be limited to:

- (a) Methods for determining a combustion efficiency trigger level for each affected boiler. The trigger level shall be based on a minimum of 12 CE tests performed during operating conditions that are representative of the typical operating range of the respective boiler. The initial CE trigger level shall be established within one-hundred eighty (180) days after the issuance of this Permit. For boilers that only operate seasonally, the testing must be completed within one-hundred eighty (180) days of the start of its operating season;
- (b) The procedures to be followed to increase combustion efficiency whenever the combustion efficiency is determined to be less than the trigger level;
- (c) Descriptions of routine maintenance and inspection procedures including a description of the procedure for and frequency of ash removal from the boiler and the particulate matter emission control device;
- (d) Provisions for maintaining records of maintenance and inspection procedures, including both routine activities and actions taken in response to observations of low combustion efficiency; and
- (e) Provisions for calibration and maintenance of any testing instruments and/or equipment used to measure the concentrations of CO<sub>2</sub> and CO in the boiler exhaust gases.

Failure to take reasonable steps in accordance with said plan to increase the combustion efficiency once it has fallen below the trigger level may be considered credible evidence of an exceedance of the opacity and particulate emission limits set forth in this Permit. Said O&M Plan shall be present at the Facility at all times and shall be made available to representatives of the Agency upon request. The Permittee shall revise said O&M Plan at the Agency's request or on its own motion based on operating experience or to reflect equipment or operational changes. [10 V.S.A. §§556(c) and 556a(d)] [§5-405 of the *Regulations*] [#AOP-05-036]

- Record Keeping and Reporting -

- (21) Records of Fuel Use: The Permittee shall maintain records of the total quantity of fuel used in the equipment listed below:

Equipment	Fuel Type
IBC Wood-Fired Boiler	Wood Fuel >20% moisture
Cleaver Brooks Oil-Fired Boiler	No. 6 Fuel oil

At the beginning of each calendar year, the Permittee shall calculate the total quantity of fuel consumed in the equipment, during the previous calendar year. [10 V.S.A. §§556(c) and 556a(d)] [§5-405(1) of the *Regulations*]

- (22) Records of Combustion Efficiency Testing: The Permittee shall maintain records of the results of the combustion efficiency testing conducted on the wood-fired boiler. These records shall at least include the test date, identification of boiler tested, a measurement of the load on the boiler (such as fuel feed rate or steam production rate), the concentrations of oxygen, carbon monoxide and carbon dioxide in the exhaust gas as well as the calculated combustion efficiency. [10 V.S.A. §§556(c) and 556a(d)] [§§5-405(1) and 5-1015(a)(3) and (4) of the *Regulations*]
- (23) Records of Fuel Oil Certifications [Boilers]: The Permittee shall obtain from the fuel supplier, for each shipment of fuel oil received at the Facility for use in the Cleaver Brooks 20.9 MMBtu/hr No 6. oil-fired boiler a certification or invoice regarding the sulfur content of the fuel oil. The certification or invoice shall include: the date of delivery, name of the fuel oil supplier, fuel type, quantity of fuel oil delivered, the sulfur content of the fuel delivered, and the location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil, specifically including whether the oil was sampled as delivered to the affected facility, or whether the sample was drawn from oil in storage at the oil supplier's or oil refiner's facility, or other location, and the method used to determine the sulfur content of the oil. [10 V.S.A. §§556(c) and 556a(d)] [§5-405(1) of the *Regulations*]
- (24) Records: All records shall be retained for a minimum period of five (5) years from the date of record and shall be made available to the Agency upon request. [10 V.S.A. §§556(c) and 556a(d)] [§§5-402, 5-405(1) and 5-1015(a)(7) of the *Regulations*]
- (25) Notification: The Permittee shall notify the Agency in writing within ten (10) days of any violation, of which it is aware, of any requirements of this Permit. This notification shall include, at a minimum, the cause for the violation and corrective action or preventative maintenance taken to correct the violation. [10 V.S.A. §§556(c) and 556a(d)] [§§5-402 and 5-1015(a)(6) of the *Regulations*]
- (26) Notification: The Permittee shall notify the Agency in writing of any proposed physical or operational change at the Facility which may increase the emission rate of any air contaminant to the ambient air regardless of any concurrent emission reductions that may

be achieved. This notification requirement includes, but is not limited to, the proposed installation of any new equipment that is a source of air pollution, including the replacement of an existing permitted air pollution source. If the Agency determines that a permit amendment is required, a new application and the appropriate application fee shall be submitted. The permit amendment shall be obtained prior to commencing any such change except as may otherwise be allowed by the *Regulations*. [10 V.S.A. §§556(c) and 556a(d)] [§§5-402 and 5-501 of the *Regulations*]

- (27) Annual Registration: The Permittee shall calculate the quantity of emissions of air contaminants from the Facility annually. If the Facility emits more than five (5) tons of any and all air contaminants per year, the Permittee shall register the source with the Secretary of the Agency (hereinafter "Secretary"), and shall renew such registration annually. Each day of operating a source which is subject to registration without a valid, current registration shall constitute a separate violation and subject the Permittee to civil penalties. The registration process shall follow the procedures set forth in Subchapter VIII of the *Regulations*, including the payment of the annual registration fee on or before May 15 of each year. [10 V.S.A. §§556(c) and 556a(d)] [Subchapter VIII §§5-802, 5-803, 5-807, 5-808 of the *Regulations*]

- (28) All records, notifications and reports that are required to be submitted to the Agency by this Permit shall be submitted to:

Air Quality & Climate Division  
Department of Environmental Conservation  
Agency of Natural Resources  
Davis 2  
One National Life Drive  
Montpelier, Vermont 05620-3802

[10 V.S.A. §§556(c) and 556a(d)] [§5-402 of the *Regulations*]

- (29) All records, notifications and reports that are required to be submitted to the U.S. EPA by this Permit shall be submitted to:

Air Compliance Clerk  
U.S. EPA-New England  
5 Post Office Sq. Suite 100 (OES04-2)  
Boston, MA 02109-3912

[10 V.S.A. §§556(c) and 556a(d)] [§5-402 of the *Regulations*]

- Standard Permit Conditions -

- (30) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Agency which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [10 V.S.A. §§556(c) and 556a(d)] [40 CFR Part 60.11(d) and 63.6(e)]
- (31) These Permit conditions may be suspended, terminated, modified, or revoked for cause and reissued upon the filing of a written request with the Secretary of the Agency (hereinafter "Secretary") or upon the Secretary's own motion. Any modification shall be granted only with the written approval of the Secretary. If the Secretary finds that modification is appropriate, only the conditions subject to modification shall be re-opened. The filing of a request for modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay any terms or conditions of this Permit. The Secretary may provide opportunity for public comment on any proposed modification of these conditions. If public comments are solicited, the Secretary shall follow the procedures set forth in 10 V.S.A. §556 and §556a, as amended. [10 V.S.A. §§556(d) and 556a(g)] [§5-1008(a) and 5-1008(e) of the *Regulations*]
- (32) Cause for reopening, modification, termination and revocation of this Permit includes, but is not limited to:
- (a) Inclusion of additional applicable requirements pursuant to state or federal law;
  - (b) A determination that the permit contains a material mistake or that inaccurate information was used to establish emissions standards or other terms or conditions of the operating permit;
  - (c) A determination that the operating permit must be modified or revoked to ensure compliance with applicable requirements;
  - (d) A determination that the subject source has failed to comply with a permit condition;
  - (e) For Title V subject sources, a determination by U.S. EPA that cause exists to terminate, modify, revoke or reissue an operating permit;
  - (f) Those causes which are stated as grounds for refusal to issue, renew or modify an operating permit under §5-1008(a) of the *Regulations*; or
  - (g) If more than three (3) years remain in the permit term and the source becomes subject to a new applicable requirement.

[10 V.S.A. §§556(c) and 556a(d)] [§5-1008(e)(4) of the *Regulations*]

- (33) The Permittee shall furnish to the Agency, within a reasonable time, any information that the Agency may request in writing to determine whether cause exists to modify, revoke, reissue, or terminate the Permit or to determine compliance with this Permit. Upon request, the Permittee shall also furnish to the Agency copies of records required to be kept by this Permit. [10 V.S.A. §§556(c) and 556a(d)] [§5-402 of the *Regulations*]
- (34) By acceptance of this Permit, the Permittee agrees to allow representatives of the State of Vermont access to the properties covered by the Permit, at reasonable times, to ascertain compliance with Vermont environmental and health statutes and regulations and with this Permit. The Permittee also agrees to give the Agency access to review and copy any records required to be maintained by this Permit, and to sample or monitor at reasonable times to ascertain compliance with this Permit. [10 V.S.A. §§556(c), 556a(d) and 557] [ §§5-402, 5-404, and 5-1015(a)(10) of the *Regulations*]
- (35) All data, plans, specifications, analyses and other information submitted or caused to be submitted to the Agency as part of the application for this Permit or an amendment to this Permit shall be complete and truthful and, for Title V permit applications, certified by a responsible official whose designation has been approved by the Secretary. Any such submission which is false or misleading shall be sufficient grounds for denial or revocation of this Permit, and may result in a fine and/or imprisonment under the authority of Vermont statutes. [10 V.S.A. §§556(c) and 556a(d)] [ §§5-505 and 5-1006(f) of the *Regulations*]
- (36) For the purpose of establishing whether or not a person has violated or is in violation of any condition of this Permit, nothing in this Permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [10 V.S.A. §§556(c) and 556a(d)]
- (37) Any permit noncompliance could constitute a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [10 V.S.A. §§556(c) and 556a(d)] [ §§5-1008(a) and 5-1008(e) of the *Regulations*]
- (38) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this Permit. [10 V.S.A. §§556(c) and 556a(d)]
- (39) No person shall build, erect, install or use any article, machine, equipment or other contrivances, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which otherwise would constitute a violation of these *Regulations*. [10 V.S.A. §§556(c) and 556a(d)] [ §5-403 of the *Regulations*]
- (40) The provisions of this Permit are severable. If any provision of this Permit, or its application to any person or circumstances is held invalid, illegal, or unenforceable by a court of competent jurisdiction, the invalidity shall not apply to any other portion of this Permit which can be given effect without the invalid provision or application thereof. [10 V.S.A. §§556(c) and 556a(d)]

- (41) This Permit does not convey any property rights of any sort or any exclusive privilege, nor does it authorize any injury to private property or any invasion of personal rights. [10 V.S.A. §§556(c) and 556a(d)]
- (42) All subsequent owners and/or operators of this Facility must request an amendment and transfer of this Permit prior to commencing any operations covered by this Permit. All subsequent owners and/or operators shall submit to the Agency as part of the request for amendment all such information the Agency deems necessary to establish legal ownership and/or interest in the property and all such information the Agency deems necessary to ensure the new owners and/or operators will construct and operate the Facility in compliance with the *Regulations* and this Permit. The terms and conditions of this Permit shall remain in full force and effect after submittal of the request for amendment and until the issuance of an amended Permit or denial. Should the Secretary deny the request, the new owner and/or operator must take whatever action is necessary to comply with the denial. [10 V.S.A. §§556 and 556a] [§§5-501, 5-1004, and 5-1013(a) of the *Regulations*]
- (43) Renewable Energy Projects – Right to Appeal to Public Service Board. If this decision relates to a renewable energy plant for which a certificate of public good is required under 30 V.S.A. §248, any appeal of this decision must be filed with the Vermont Public Service Board pursuant to 10 V.S.A. §8506. This section does not apply to a facility that is subject to 10 V.S.A. §1004 (dams before the Federal Energy Regulatory Commission), 10 V.S.A. §1006 (certification of hydroelectric projects) or 10 V.S.A. Chapter 43 (dams). Any appeal under this section must be filed with the Clerk of the Public Service Board within 30 days of the date of this decision; the appellant must file with the Clerk an original and six copies of its appeal. The appellant shall provide notice of the filing of an appeal in accordance with 10 V.S.A. 8504(c)(2), and shall also serve a copy of the Notice of Appeal on the Vermont Department of Public Service. For further information, see the Rules and General Orders of the Public Service Board, available on line at [www.psb.vermont.gov](http://www.psb.vermont.gov). The address for the Public Service Board is 112 State Street, Montpelier, Vermont, 05620-2701 (Tel. # 802-828-2358). [10 V.S.A. §§556(c) and 556a(d)]
- (44) All Other Projects – Right to Appeal to Environmental Court. Pursuant to 10 V.S.A. Chapter 220, any appeal of this decision must be filed with the clerk of the Environmental Court within 30 days of the date of the decision. The Notice of Appeal must specify the parties taking the appeal and the statutory provision under which each party claims party status; must designate the act or decision appealed from; must name the Environmental Court; and must be signed by the appellant or their attorney. In addition, the appeal must give the address or location and description of the property, project or facility with which the appeal is concerned and the name of the applicant or any permit involved in the appeal. The appellant must also serve a copy of the Notice of Appeal in accordance with Rule 5(b)(4)(B) of the Vermont Rules for Environmental Court Proceedings. For further information, see the Vermont Rules for Environmental Court Proceedings, available on line at [www.vermontjudiciary.org](http://www.vermontjudiciary.org). The address for the Environmental Court is 2418 Airport Road, Suite 1, Barre, VT 05641 (Tel. # 802-828-1660). [10 V.S.A. §§556(c) and 556a(d)]

Cersosimo Lumber Company, Inc  
Brattleboro Kiln Dry

#AOP-12-039

- (45) This Operating Permit shall expire as indicated on the cover page to this Permit. The Permittee shall submit to the Agency a complete application for renewal of the Operating Permit at least twelve (12) months before the expiration of the Operating Permit. If a timely and administratively complete application for an operating permit renewal is submitted to the Secretary, but the Secretary has failed to issue or deny such renewal before the end of the term of this Operating Permit, then the Permittee may continue to operate the subject source and all terms and conditions of this Operating Permit shall remain in effect until the Secretary has issued or denied the operating permit renewal. However, this Operating Permit shall automatically expire if, subsequent to the renewal application being determined or deemed administratively complete pursuant to §5-1006 of the *Regulations*, the Permittee fails to submit any additional information required by the Secretary as well as information pertaining to changes to the Facility within thirty (30) days or such other period as specified in writing by the Secretary. [10 V.S.A. §§556(c) and 556a(d)] [§§5-1011 and 5-1012(a) of the *Regulations*] [§§5-1005(c) and 5-1012 of the *Regulations*]
- (46) The conditions of this Permit as set forth above supersede all conditions contained in all prior Permits issued by the Agency to the Permittee for this Facility. [10 V.S.A. §§556(c) and 556a(d)]

The Agency's issuance of this Air Pollution Control Permit relies upon the data, judgment, and other information supplied by the Permittee. The Agency makes no assurances that the air contaminant source approved herein will meet performance objectives or vendor guarantees supplied to the source Permittee. It is the sole responsibility of the Permittee to operate the source in accordance with the conditions herein and with all applicable state and federal standards and regulations.

Dated this 5<sup>th</sup> day of July, 2016.

Agency of Natural Resources

Alyssa B. Schuren, Commissioner  
Department of Environmental Conservation

By:   
Heidi C. Hales, Director  
Air Quality & Climate Division

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State of Vermont  
Department of Environmental Conservation  
Air Quality & Climate Division  
Davis Building – 2<sup>nd</sup> Floor  
One National Life Drive  
Montpelier, VT 05620-3802  
(802) 828-1288  
FAX (802) 828-1250

AGENCY OF NATURAL RESOURCES

July 5<sup>th</sup>, 2016

Jeff Hardy  
Cersosimo Lumber Company, Inc.  
1103 Vernon Street  
Brattleboro, VT 05301-8615

RE: Final Air Pollution Control Permit to Construct and Operate (#AOP-12-039)  
Brattleboro Kiln Dry Division

Dear Mr. Hardy:

The Vermont Agency of Natural Resources (ANR) Department of Environmental Conservation (DEC) Air Quality & Climate Division (Agency) has completed its review of Cersosimo Lumber Company's application for the renewal of a Permit to Operate the Facility located at 46 Frost Street in the town of Brattleboro, Vermont. The Agency is now issuing a final Air Pollution Control Permit to Construct and Operate approving the proposed project.

Consistent with the provisions of 10 V.S.A. §556(e) and for the purposes of reducing the administrative burden of enforcing two separate permits for this Facility, the Agency is incorporating the existing Permit to Construct requirements contained in the prior Air Pollution Control Permit to Construct and Operate (#AOP-05-036) previously issued on December 10, 2007 with the current renewal of the Air Pollution Control Permit to Operate. The result is a combined Air Pollution Control Permit to Construct and Operate which satisfies both the construction permit (10 V.S.A. §556 and Subchapter V of the Regulations) and operating permit (10 V.S.A. §556a and Subchapter X of the Regulations) requirements for your Facility. This combined permit incorporates and supersedes all prior Permit to Construct and/or Operate approvals issued in the past. Please note this permit is valid for a period of five (5) years and an application to renew the permit must be filed at least twelve (12) months prior to the date of expiration.

Please review this Permit carefully to ensure that you are currently, and continue to be, in compliance with all the requirements contained in this Permit. There are a few key points included in this permit or that you may otherwise be subject to that I would like to highlight for your convenience:

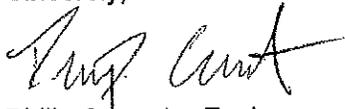
- Wood fired boilers. The Agency has included consistent permit requirements to ensure wood fired boilers are properly operated and maintained. Older wood fired boilers are significant air pollution emission sources whose emissions are exacerbated by lack of proper operation and maintenance. We have included a requirement for an operation and maintenance (O&M) plan so current and future boiler operators are aware of proper operation and maintenance requirements. We will also be adding a requirement to test combustion efficiency of the unit periodically so the unit can be tuned up to improve efficiency. The facility could purchase their own unit to do this, share a unit with another facility, or contract this out. A separate federal requirement requires the boiler to be tuned-up at least every two years.



- Volatile organics from kiln drying of wood. The permits need to document which facilities have wood drying kilns, the capacity of those kilns, the ratio of softwood to hardwood and the number of board feet of lumber kiln dried in a typical year so we can estimate volatile organic compound emission associated with the kiln drying. The level of VOC emissions is not expected to be very high, especially if they are used primarily for hardwood drying, but the permits need to consistently identify and address these potential emissions.
- No regulation of green wood waste handling operations. The permits will document green wood waste (sawdust) handling and note that the Agency does not consider particulate emissions from green wood waste handling to be of regulatory concern at this time. Use of wide body cyclones is acceptable for green wood waste handling.
- Regulation of dry wood waste handling operations. Dry wood wastes from processing of kiln dried material is still considered a regulatory concern as the emissions tend to be smaller and more likely to remain air borne pollutants. Wide body cyclone control of pneumatic conveying of these dry wood wastes is marginal and the cyclones should be followed with a fabric filter control device, especially if any sander dust is present in the wood wastes being conveyed. Pre-existing operations may be allowed to continue with simple cyclone controls provided there is no sander dust present, but the facility is advised to improve emission controls to a fabric filter when feasible as it may become a requirement in the future to ensure compliance with an existing particulate matter emission limitation in §5-231 of the Regulations. Returning the exhaust of the control device back inside the building removes it from our jurisdiction (does not include a leaky sawdust shed) but it then raises worker exposure issues.
- Oil and biomass (wood) boilers: The federal U.S. EPA has recently adopted and amended a regulation that may apply to any oil or wood boilers at your facility. This regulation is 40 CFR Part 63 Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers. The State of Vermont is not authorized to enforce this regulation, but we are providing you with an informational summary of what is required. Please consult the actual regulation for the specific requirements. For further information, please see the EPA's website: <http://www.epa.gov/boilercompliance/>.
  1. Boilers fired exclusively with natural gas or propane are not subject. Such boilers are allowed backup fuel oil usage during gas curtailments and up to 48 hours of elective operation per year and still maintain their exemption. Oil fired units less than 1.6 MMBTU/hr are also exempt.
  2. Boilers installed after June 4, 2010 are subject to the new boiler requirements. Older boilers are subject to the existing boiler requirements.
  3. The rule requires a tune-up for each subject boiler once every two years except boilers with oxygen trim and oil boilers less than 5 MMBTU/hr may conduct tune-ups every five years. The initial tune-up was required to be completed by March 21, 2014.
  4. For facilities with at least one existing boiler rated at 10 MMBTU/hr heat input or greater, the facility was required to conduct a one-time energy assessment audit of the facility by March 21, 2014.
  5. New biomass (wood) boilers rated at 10 MMBTU/hr heat input or greater have additional requirements including PM emission limits, stack testing every three years and minimize the boiler's startup and shutdown periods following the manufacturer's recommended procedures. If the initial PM emission test demonstrates your affected boiler has a PM emission rate that is equal to or less than half the emission limit, then you will not need to perform subsequent PM emission tests on this boiler.
  6. New oil boilers rated at 10 MMBTU/hr heat input or greater have additional requirements including PM emission limits and minimize the boiler's startup and shutdown periods following the manufacturer's recommended procedures. If your oil boiler burns fuel oil with a sulfur content of greater than 0.5%, then you must conduct stack testing every three years. If the initial PM emission test demonstrates your affected boiler has a PM emission rate that is equal to or less than half the emission limit, then you will not need to perform subsequent PM emission tests on this boiler.

If you have any questions or comments, please feel free to contact me by phone at (802) 461-9001, by email at Philip.cannata@vermont.gov, or in writing at the above address.

Sincerely,



Philip Cannata, Environmental Engineer  
Engineering Services/Permitting Section  
Air Quality & Climate Division

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