

Shermag d.b.a. Woodtek)	Departmental
Somerset County)	Findings of Fact and Order
North Anson, Maine)	Air Emission License
A-276-71-I-M/R)	

After review of the air emissions license renewal application, staff investigation reports and other documents in the applicant’s file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Shermag d.b.a Woodtek (Woodtek) of North Anson, Maine has applied to renew their Air Emission License permitting the operation of emission sources associated with their wood products facility.

B. Emission Equipment

Woodtek is authorized to operate the following equipment:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (lb/hr)</u>	<u>Fuel Type, % moisture</u>	<u>Stack #</u>
Boiler #1	18	4286	wood waste, 35%	1

Process Equipment

<u>Equipment</u>	<u>Pollutant</u>	<u>Pollution Control Equipment</u>
Pneumatic wood handling	Particulate matter	cyclones
Wood drying kilns (8)	VOC	none

C. Application Classification

The application for Woodtek includes the addition of existing but previously unlicensed wood drying kilns. Due to the increase in licensed emissions, this application is considered to be a renewal and amendment.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

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

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

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

Process Description

Woodtek produces wood products by the sawing, milling and machining of hardwood into gunstocks and miter boxes.

Once the logs have been cut into planks they are sorted and then dried in one of eight kilns to remove any excess moisture. The wood is then machined into the desired form at any number of Woodtek's milling stations. Each station is equipped with a sawdust collection system, which feeds to a single cyclonic separator.

The sawdust and other waste wood from the facility is then automatically fed to a single 18.0 MMBtu/hr boiler used to produce steam and facilitate other heating needs. At this time there is no post combustion control equipment.

B. Boiler

Boiler #1 is a wood fired boiler with a maximum input capacity of 18.0 MMBtu/hr. The boiler fires wood waste at approximately 35% moisture content.

A summary of the BPT analysis for each of the pollutants is discussed below:

1. PM and PM₁₀ emission rates are based upon MEDEP Chapter 103.
2. SO₂, NO_x, CO and VOC emission rates are based upon AP-42 data dated 2/99 for combustion in wood fired boilers.

3. Visible emissions from Boiler #1 shall not exceed 30% opacity on a six-minute block average basis, except for no more than 2 six-minute block averages in any three-hour period.

C. Process Emission Sources

Woodtek operates eight wood drying kilns, which give off VOC emissions. The utilization of cyclones for the waste wood pneumatic system represents BPT for control of particulate matter.

D. Annual Emission Restrictions

Woodtek shall be restricted to the following annual emissions, based on a 12-month rolling total:

Total Allowable Annual Emission for the Facility
(used to calculate the annual license fee)

<u>Pollutant</u>	<u>Tons/Year</u>
PM	26.2
PM ₁₀	26.2
SO ₂	0.5
NO _x	15.1
CO	20.2
VOC	4.0

III. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Modeling was performed in 1998, at which time it was determined that Shermag-Woodtek would not cause or contribute to violations of Maine Ambient Air Quality Standards or any Class II standards. The only increase in emissions for this amendment is for VOC, which was not required to be modeled in 1998, and is also not required as a result of the licensed increase. As a result, additional modeling is not being required at this time.

ORDER

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

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

The Department hereby grants Air Emission License A-276-71-I-M/R subject the following conditions:

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions.
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115.
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both.
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request.
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. \ 353.
- (6) The license does not convey any property rights of any sort, or any exclusive privilege.
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions.
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request.

- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license.
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- (i) perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 - a. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 - b. pursuant to any other requirement of this license to perform stack testing.
 - (ii) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - (iii) submit a written report to the Department within thirty (30) days from date of test completion.
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- (i) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
 - (ii) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during

which no violation occurred or that the violation was not continuing in nature; and

- (iii) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation.
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

SPECIFIC CONDITIONS

- (16) Boiler
 - A. Capacity shall not exceed 18.0 MMBtu/hr.
 - B. Fuel use shall not exceed 12,000 ton/yr wood waste at approximately 35% moisture content based on a 12-month rolling total. Fuel use records shall be maintained on a monthly basis, in addition to the 12-month rolling total.
 - C. Emissions shall not exceed the following:

Equipment		PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boiler #1	lb/MMBtu	0.52	-	-	-	-	-
	lb/hr	9.4	9.4	0.18	5.4	7.2	1.1

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**Departmental
Findings of Fact and Order
Air Emission License**

- (17) Woodtek shall calculate fuel usage according to the method submitted on October 10, 2000, and which may be found on record in the applicant's file at the Bureau of Air Quality.
- (18) The drying kilns shall be limited to 1.0 ton of VOC emissions per year, based on a 12-month rolling total. Emission rates are based upon a factor of 0.12 lb VOC/BF of Cedar processed in the kiln, and a maximum of 8,000,000 board feet processed per year. Emission factors for Cedar have been used as a worst case scenario due to the lack of existing factors for hardwood species.
- (19) Woodtek shall maintain a log for the drying kilns, including amounts of each species processed on a monthly basis, in addition to the 12-month rolling total.
- (20) **Stockpiles and Roadways**
Potential sources of fugitive PM emissions including material stockpiles and roadways shall be controlled by wetting with water, with calcium chloride, or other methods as approved by the Bureau of Air Quality to prevent visible emissions in excess of 10% opacity, on a 3 minute block average basis.
- (21) Visible emissions from the sawmill and other general process sources shall be limited to 20% opacity on a six-minute block average basis, except for no more than 1 six-minute block average in any one-hour period.
- (22) Visible emissions from the cyclones shall not exceed 5% opacity on a six-minute block average basis.
- (23) The term of this Order shall be for five (5) years from the signature below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2001.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 16, 1999

Date of application acceptance: August 30, 1999

Date filed with the Board of Environmental Protection: _____

This Order prepared by Elisha McVay, Bureau of Air Quality.