

**Formed Fiber Technologies, Inc.  
Androscoggin County  
Auburn, Maine  
A-678-71-K-A**

**Departmental  
Findings of Fact and Order  
Air Emission License  
Amendment #1**

After review of the air emissions license amendment 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**

Formed Fiber Technologies, Inc. (FFT) of Auburn, Maine was issued Air Emission License A-678-71-J-R/A on October 19, 2006, permitting the operation of emission sources associated with their non-woven fiber products facility.

FFT has requested an amendment to operate the thermo-bonders without the scrubber for up to 200 hours per calendar year.

**B. Application Classification**

The application for FFT includes a change of emission limits for up to 200 hours per calendar year. Therefore, the license is considered to be a minor modification of a minor source and has been processed through 06-096 CMR 115.

**C. Minor Modification Description**

FFT operates thermo-bonding ovens to manufacture non-woven products. PM emissions from these product are controlled using a fiberbed scrubber. Condition (17) of the current license states:

“FFT shall operate the thermo-bonding ovens only at times when the fiberbed scrubber is in operation.”

So as to allow for routine preventative maintenance and operational flexibility for periods of unavoidable malfunctions, FFT has requested a change from the above scrubber uptime requirement. Stack testing performed in 1998 and 1999 determined that FFT can operate within the PM emission limits of the current license by controlling the product mix and rates of production based on the uncontrolled emission factors for FFT's four major product types.

FFT has determined 200 hours per calendar year of thermo-bonder operation without the scrubber is adequate to perform planned repairs and maintenance while allowing some operational flexibility for periods of unavoidable malfunctions. FFT will track the products being produced and the production rates during such periods to ensure PM emissions remain within the licensed emission limits.

**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-678-71-K-A subject to the conditions Air Emission License A-678-71-J-R/A and in the following conditions.

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

**The following shall replace Condition 17 of Air Emission License A-678-71-J-R/A:**

(17) Thermo-bonder ovens [06-096 CMR 115, BPT]

- A. FFT may operate the thermo-bonding ovens without the fiberbed scrubber in operation for up to 200 hours per calendar year during periods of scrubber malfunction or for undertaking repairs or preventative maintenance on the scrubber. FFT shall maintain records indicating the date, time and cause of scrubber downtime and records demonstrating that PM emissions from the thermo-bonding ovens do not exceed the limits in Condition 16(A) during periods of scrubber downtime. PM emissions during scrubber downtime shall be based on production rates (square yards of product) multiplied by the following emissions factors on a 3 hour block average basis:

CON-FORM T	=	0.001248 lbs/yd <sup>2</sup>
CON-FORM II	=	0.002261 lbs/yd <sup>2</sup>
MAT-FORM	=	0.001362 lbs/yd <sup>2</sup>
TARA-LOCK	=	0.000203 lbs/yd <sup>2</sup>

For new product lines, FFT shall submit proposed emissions factors to the Department for approval

- B. Notwithstanding Condition 16(B), during periods of scrubber downtime visible emissions from the stack(s) serving the thermo-bonders shall not exceed 30% opacity on a six-minute block average basis, except for not more than three (3) six (6) minute block averages in a 3-hour block period. [06-096 CMR 101]

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C. FFT shall submit semiannual reports every six months to the Bureau of Air Quality detailing the date, time and cause of scrubber downtime and records demonstrating that PM emissions from the thermo-bonding ovens did not exceed the limits in Condition 16(A) during periods of scrubber downtime. The semiannual reports are due on **July 31<sup>st</sup>** and **January 31<sup>st</sup>** of each year. The facility's designated responsible official must sign this report.

DONE AND DATED IN AUGUSTA, MAINE THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2007.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
DAVID P. LITTELL, COMMISSIONER

**The term of this amendment shall be concurrent with the term of Air Emission License A-678-71-J-R/A.**

PLEASE NOTE THE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: July 3, 2007  
Date of application acceptance: July 12, 2007

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

This Order prepared by Mark Roberts, Bureau of Air Quality.