

**PIONEER PLASTICS CORPORATION)
ANDROSCOGGIN COUNTY)
AUBURN, MAINE)
A-448-70-C-A)**

**DEPARTMENTAL
FINDING OF FACT AND ORDER
AIR EMISSION LICENSE
AMENDMENT #2**

After review of the air emissions license 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

Pioneer Plastics Corporation (Pioneer) operates a manufacturing plant in Auburn, Maine. The principal products are Pionite, a decorative laminate used for counter tops and furniture, and low pressure decorative laminates. Pioneer has requested an administrative revision to modify their air emissions license, A-448-70-A-A/I, to incorporate the requirements established in the Chapter 115 New Source Review minor revision, A-448-77-2-M.

FACILITY	Pioneer Plastics Corporation (Pioneer)
LICENSE NUMBER	A-448-70-C-A
LICENSE TYPE	Chapter 140 Administrative Revision
NAICS CODES	325211, 322222, 326130
NATURE OF BUSINESS	Manufacturer of decorative laminate, melamine coated paper, and specialty resins
FACILITY LOCATION	Auburn, Maine
DATE OF INITIAL LICENSE ISSUANCE	April 20, 2004
DATE OF MINOR REVISION ISSUANCE	April 30, 2007
LICENSE EXPIRATION DATE	April 20, 2009

II. APPLICATION CLASSIFICATION

Pioneer's application was submitted pursuant to the Administrative Revision procedures of Chapter 140. A separate New Source Review (NSR) Chapter 115 license minor revision, A-448-77-2-M, addresses the provisions of NSR. Both Orders, the Chapter 140 Administrative Revision and the Chapter 115 New Source Review minor license revision, will be issued simultaneously.

This revision for Pioneer does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping. This revision addresses flexibility with the use of the K8 reactor to produce both polyester resin and melamine resin and provisions for a new tile saw and associated dust collector. This amendment will also update the Maximum Achievable Control Technology (MACT) compliance dates, set in the current air license, with changes EPA and the Department have made since its issuance. This amendment will not increase licensed allowable emissions of any pollutant and seeks only to incorporate the changes requested through the Chapter 115 NSR revision.

III. REVISION DESCRIPTION

Pioneer has requested this Administrative Revision to incorporate conditions established in the Chapter 115 NSR minor revision, A-448-77-2-M. Also, this revision will update the compliance dates for various state and federal requirements that have been extended.

A. K8 Reactor Project Description

Pioneer proposes production of melamine resin in an existing polyester reactor K8 to meet customer demands. The K8 reactor is currently permitted in Air Emissions License, A-448-70-A-A/I, under Condition 21 (A) to operate only with polyester resin as with existing polyester resin reactors: K4, K5, K6, and K7. As approved in A-448-77-2-M, Pioneer may operate K8 either as a polyester reactor or a melamine/urea reactor.

Flexibility

Pioneer has the operational flexibility to produce either melamine resin or polyester resin in the K8. Emissions from K8 are currently vented to the Thermal Oxidizer (VOC incinerator) for control via the MACT vent collection system. The Thermal Oxidizer has a control efficiency rate of greater than 98%. By having this flexibility for melamine or polyester production, licensed allowable HAP and VOC emissions will not increase from the facility and actual emissions increase will be minimal. Emissions from K8 will be vented to the Thermal Oxidizer which meets the requirements for both MACT and Best Practical Treatment (BPT). BPT is met by complying with the applicable MACT requirements for K8 reactor.

B. New Tile Saw

Pioneer may add a tile saw to their operations as specified in license, A-448-77-2-M. The tile saw will be used to cut tiles for Pioneer's various products. To meet Best Available Control Technology (BACT), Pioneer will install a fabric filter dust collector to control particulate emissions. Visible emissions from the tile cutting saw equipment with fabric filter control shall not exceed an opacity of 10%, on a 6-minute block average basis, except for no more than (1) one (6) six minute block average in a 1-hour period. The facility shall take corrective action if visible emissions from the dust collector exceed 5% opacity.

C. Changes to Compliance Dates in Air Emissions License, A-448-70-A-A/I, to reflect EPA changes and DEP granted extensions.

The following changes will be made in Pioneer's existing Part 70 license to reflect changes in the EPA compliance dates and the compliance date extension granted by the DEP.

Permit Condition 20. B. a. (This condition applies to the K3 reactor and will update the compliance date for the Organic Liquid Distribution (OLD) rule).

- The compliance date shall be February 5, 2008 in accordance with the 1-year extension that was granted by MEDEP.

Permit Condition 21. B. a. (This condition applies to the polyester resin reactors K4, K5, K6, K7, and K8 which will update the compliance date of the Miscellaneous Organic NESHAP).

- The compliance date is now May 10, 2008 based on an EPA Rule amendment dated July 14, 2006.

Permit Condition 28. b. (This condition applies to the storage tanks and will update the compliance date of the Organic Liquid Distribution (OLD) rule.)

- The compliance date shall be February 5, 2008 in accordance with the 1-year extension that was granted by the MEDEP.

Permit Condition 31. a. (This condition applies to the chemical loading/unloading operations and will update the compliance date of the Organic Liquid Distribution (OLD) rule.)

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- The compliance date shall be February 5, 2008 in accordance with the 1-year extension that was granted by the MEDEP.

ORDER

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

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

The Department hereby grants this Administrative revision, A-448-70-C-A, subject to the conditions found in Air Emission License A-448-70-A-A/I and subsequent amendments, in addition to the following conditions:

The following condition replaces Condition (20) B. a. in Air Emissions License, A-448-70-A-A/I and Amendment #1, A-448-70-B-A:

- (20) B. Phenolic Resin Blending: Reactor K3 is subject to the POWC 40 C.F.R. Part 63, Subpart JJJJ and OLD 40 CFR Part 63, Subpart EEEE:
- a. Pioneer's phenolic blending reactor K3 is part of the Paper and Other Web Coating National Emission Standards for Hazardous Air Pollutants (POWC) [40 C.F.R. Part 63, Subpart JJJJ] source category but is not part of the affected source. This makes this operation subject to the requirements of the Organic Liquid Distribution (OLD) MACT rule. The OLD rule was finalized on February 3, 2004 with a compliance date of February 5, 2007. A one year extension was requested and granted. This source shall meet the requirements specified below.
 - The compliance date shall be February 5, 2008.

- The equipment shall meet the emission limitations as specified in 40 CFR 63.2346.
- The facility shall develop a work practice plan in accordance with 40 CFR 63.2346.
- The facility shall develop a Start-up, Shut-down and Malfunction Plan in accordance with 40 CFR 63.2350 (c).
- If a control device is used, the facility shall meet the operating limits specified in 40 CFR 63.2346 and shall conduct a Performance Test as required by 40 CFR 63.2354. The performance test must be conducted according to the schedule specified in 40 CFR 63.2358
- The facility shall comply with the continuous compliance and monitoring of 40 CFR 63.2366, 63.2374, and 63.2378.
- The facility shall comply with the reporting requirements of 40 CFR 63.2386 and MEDEP Chapter 140.
- Recordkeeping shall include documents specified in 40 CFR 63.2390 and shall be kept in accordance with 40 CFR 63.2394.

The following condition replaces Condition (21) in Air Emissions License, A-448-70-A-A/I, and Amendment #1, A-448-70-B-A. All references to K8 in Condition (21) are omitted.

(21) A. Polyester Resin Reactors K4, K5, K6, and K7

1. The following conditions are to meet VOC RACT:

- (a) At all times that K4, K5, K6, and K7 are producing polyester resins, Pioneer shall vent the emissions from the main outlet vent on each reactor to the Thermal Oxidizer for destruction, except such emissions may be vented to the Wet Scrubber system for control for up to 300 hours a calendar year. [MEDEP Chapter 134]
- (b) At all times that K4, K5, K6, and K7 are blending polyester resins, Pioneer shall vent the emissions from the main outlet vent on each reactor through the separating column and vapor condenser which shall be operated to maximize the condensation of any emissions. The temperature of the

coolant on the inlet side of the vapor condensers to K4, K5, K6, and K7 shall be maintained below 100 degrees Fahrenheit while the reactors are blending polyester resins. Pioneer shall record the date and length of time in minutes when each reactor is blending polyester resins. [MEDEP Chapter 134]

At all times that K4, K5, K6, and K7 are blending polyester resins, Pioneer shall monitor and record in a log the temperature of the coolant on the inlet side of the vapor condensers to K4, K5, K6, and K7, every 6 hours. Pioneer shall maintain such records for a minimum of 6 years and they shall be submitted to the Bureau of Air Quality upon request. [MEDEP Chapter 134]

2. Pioneer shall maintain a log detailing the period of time in hours and minutes, that such emissions receive control by the use of the wet scrubber system. Pioneer shall maintain such records for a minimum of 6 years and they shall be submitted to the Bureau of Air Quality upon request. [MEDEP Chapter 134]
 3. Visible emissions from each of the K4, K5, K6, and K7 reactor shall be limited to 20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period [MEDEP Chapter 140, BPT]
 4. Particulate emissions from K4, K5, K6, and K7 shall be limited to the applicable limitation from Table 105A or the formula in Section 4 of Chapter 105. [MEDEP Chapter 105]
- B. Polyester Resin Reactors K4, K5, K6, K7 are subject to the MON Requirements 40 C.F.R. Part 63, Subpart FFFF

Pioneer's polyester reactors K4, K5, K6, and K7 are subject to the Miscellaneous Organic Chemical Production Processes National Emission Standards for Hazardous Air Pollutants (MON) because this MACT rule includes, among other source subcategories, Alkyd Resins Production and Polyester Resins Production, [40 C.F.R. Part 63, Subpart FFFF]. The MON rule was finalized on November 10, 2003 with a compliance date of May 10, 2008.

The following condition replaces Condition (28) b. in Air Emissions License, A-448-70-A-A/I and Amendment #1, A-448-70-B-A.

(28) b. Pioneer has a number of storage tanks subject to the Organic Liquid Distribution MACT (40 CFR Part 63, Subpart EEEE) that was promulgated on February 3, 2004 with a compliance date of February 5, 2008.

1. Storage Tanks 29, 45, 46, 47, 48, 49 and 60 are subject to the rule but do not require controls based on their vapor pressure and the rule requirements. These tanks will be subject to the equipment leak component requirements and the recordkeeping and reporting requirements.
2. Pioneer's applicable "affiliated equipment" as defined in the Paper and Other Web Coating MACT are subject to the rule. This includes equipment used for the mixing/blending of coating ingredients, mixing for viscosity adjustment and used for additive blending prior to application to the treaters/coaters. Tanks used for the cleaning of coating lines and coating line parts and the conveyance and treatment of wastewater subject to the Paper and Other Web Coating source category are also subject. These tanks will be subject to the equipment leak component and the recordkeeping and reporting requirements of the rule. The K3 reactor is also subject to this rule and is included as Permit Condition (20)

The following condition replaces Condition (31) a. in Air Emissions License, A-448-70-A-A/I and Amendment #1, A-448-70-B-A.

(31) Chemical Loading/Unloading Operations

Pioneer's unloading operations for methanol, formaldehyde and purchased phenolic resins meet the applicability requirements of the Organic Liquids Distribution (Non-Gasoline) NESHAP (40 CFR Part 63 Subpart EEEE) that was promulgated on February 3, 2004 with a compliance date of February 5, 2008.

- a. The unloading operations for methanol and phenolic resins will be subject to the equipment leak components requirements of the rule and also the recordkeeping and monitoring requirements.
- b. The unloading operations for the formaldehyde will be subject to the recordkeeping and reporting requirements in 40 CFR Part 63.2386(d).

The following condition is new and was addressed in Pioneer's New Source Review Minor Revision, A-448-77-2-M, and shall be included in Air Emissions License, A-448-70-A-A/I.

Process Equipment

(43) A. Polyester/Melamine Resin Production) Reactor K8

When K8 is producing/blending polyester resin, Operating Scenario 1 (OS1); the following requirements apply:

1. VOC RACT requirements:

- (a) At all times that K8 is producing polyester resin, Pioneer shall vent the emissions from the main outlet vent to the Thermal Oxidizer for destruction, except such emissions may be vented to the Wet Scrubber system for control for up to 300 hours a calendar year. [MEDEP Chapter 134]
- (b) At all times that K8 is blending polyester resins, Pioneer shall vent the emissions from the main outlet vent through the separating column and vapor condenser which shall be operated to maximize the condensation of any emissions. The temperature of the coolant on the inlet side of the vapor condensers to K8 shall be maintained below 100 degrees Fahrenheit while the reactors are blending polyester resins. Pioneer shall record the date and length of time in minutes when each reactor is blending polyester resins. In addition, Pioneer shall monitor and record in a log the temperature of the coolant on the inlet side of the vapor condensers to K8, every 6 hours. Pioneer shall maintain such records for a minimum of 6 years and they shall be submitted to the Bureau of Air Quality upon request. [MEDEP Chapter 134]
- (c) Pioneer shall maintain a log detailing the period of time in hours and minutes, that such emissions receive control by the use of the wet scrubber system. Pioneer shall maintain such records for a minimum of 6 years and they shall be submitted to the Bureau of Air Quality upon request. [MEDEP Chapter 134]

2. MON Requirements of 40 C.F.R. Part 63, Subpart FFFF

Pioneer’s polyester reactor K8 is subject to the Miscellaneous Organic Chemical Production Processes National Emission Standards for Hazardous Air Pollutants (MON) because this MACT rule includes, among other source subcategories, Alkyd Resins Production and Polyester Resins Production, [40 C.F.R. Part 63, Subpart FFFF]. The MON rule was finalized on November 10, 2003 with a compliance date of May 10, 2008. This unit will only be subject to the MON rule if operating time from production of polyester resins is more than 95 percent of the total operating time in the first five-year period following license approval.

When K8 is producing/blending melamine resin, Operating Scenario 2 (OS2); the following requirements apply:

1. Melamine and Urea (Amino) Resin Production, K8 reactor is subject to the Amino/Phenolic Resin Production National Emission Standards for Hazardous Air Pollutants (NESHAPs) Requirements 40 C.F.R. Part 63, Subpart OOO.

The Amino/Phenolic Resin Production NESHAP promulgated on January 20, 2000 (40 C.F.R. Part 63, Subpart OOO) applies to Pioneer’s melamine and urea resin production operations. K8 is subject to the Amino/Phenolic MACT during production of melamine or polyester resins, where operating time from melamine production is at least 5 percent in the first five-year time period following approval of this license revision, or in any five-year time period thereafter.

- a. Pioneer filed a pre-compliance report on January 18, 2002 per 40 C.F.R. § 63.1417(d).
- b. Pioneer will comply with the applicable HAP emission standard as described below:

EMISSION POINT	APPLICABILITY	STANDARD	CITATION
Aggregate Batch Vent Stream on Reactor K8.	Applies to all aggregate batch process vents	83% reduction over the batch cycle using a control device	40 C.F.R. §63.1408(a)(2)(ii)

EMISSION POINT	APPLICABILITY	STANDARD	CITATION
Heat Exchange System on K8	The condition in 40 C.F.R. §63.1409(a)(1) is met and therefore Pioneer is not subject to the monitoring requirements for leaks of its heat exchange.	Monitor for leaks per the generic MACT Equipment Leak Provisions in 40 C.F.R. Part 63, Subpart UU.	40 C.F.R. §63.1409(a)(1-6)
Equipment Leaks	The equipment contains or contacts >5 weight % organic HAP and operates >300 hours per year.	Comply with 40 C.F.R. 63 Subpart UU (Generic MACT equipment leak rule), control level 2 for all equipment (defined in 40 C.F.R. §63.1402) that contains or contacts >5% HAPs and operates at >300 hours a year.	40 C.F.R. §63.1410

- c. Pioneer shall follow the Start-up, Shutdown, Malfunction Plan that was developed prior to the compliance date of January 20, 2004 per 40 CFR §63.6(e)(3) and Table 1 of 40 CFR Part 63 Subpart OOO.
- d. Pioneer conducted an initial performance test on the thermal oxidizer to determine the minimum parameter monitoring level per 40 CFR §63.1413(a)(1)(i).
- e. Pioneer shall submit a site specific test plan 90 days prior to the performance test referenced in (20)c above per 40 CFR §63.1417(h)(2).
- f. Pioneer provided notification to the Administrator 30 days prior to the planned performance test referenced in (20)c. above per 40 CFR §63.1417(h)(3).
- g. Pioneer filed a Notification of Compliance Status Report by June 20, 2004, per 40 C.F.R. §63.1417(e) detailing compliance methods.
- h. Pioneer shall file Periodic Reports semiannually, no later than 60 days after the end of the six-month period, per 40 C.F.R. §63.1417(f).

- i. Pioneer shall meet the compliance demonstration procedures per 40 C.F.R. §63.1413. [Owners of “large control devices” (that control emission points with total emissions of 10 tpy or more before control) must conduct a performance test no later than June 20, 2004. See 40 C.F.R. §63.1413(a)(2)(ii)(C).] Pioneer submitted this report on time.
- j. Pioneer shall keep records as indicated in 40 C.F.R. §63.1416:

When K8 is producing/blending either polyester or melamine resin, it is subject to the following requirements:

1. Visible emissions from K8 shall be limited to 20% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period [MEDEP Chapter 140]
2. Particulate emissions from K8 shall be limited to the applicable limitation from Table 105A or the formula in Section 4 of Chapter 105. [MEDEP Chapter 105]

The following condition is new and was addressed in Pioneer’s New Source Review Minor Revision, A-448-77-2-M, and shall be included in Air Emissions License, A-448-70-A-A/I.

- (44) Pioneer may install a new tile cutting saw with a dust collector to control particulate emissions. Visible emissions shall be limited to 10% opacity on a 6-minute block average basis except for no more than (1) one (6) six minute block average in a 1-hour period. The facility shall take corrective action if visible emissions from the dust collector exceed 5% opacity. In order to document

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maintenance of the baghouses, Pioneer shall keep a maintenance log recording the date and location of all bag failures. The log shall be maintained for at least six years and available to the Department upon request. [MEDEP Chapter 140, BPT]

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

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
 DAVID P. LITTELL, COMMISSIONER

This amendment shall expire concurrently with Air Emission License #A-448-70-A-A/I

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: February 7, 2007

Date of application acceptance: February 20, 2007

Date filed with Board of Environmental Protection: _____

This Order prepared by Edwin Cousins, Bureau of Air Quality