HUBER ENGINEERED WOODS, LLC	**)**	**DEPARTMENT**
AROOSTOOK COUNTY	**)**	**FINDINGS OF FACT AND ORDER**
EASTON, MAINE	**)**	**NEW SOURCE REVIEW LICENSE**
A-62-77-3-A	**)**	
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After review of the air emission 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, Section 590, 06-096 CMR 115 and the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Huber Engineered Woods, LLC (Huber)
PART 70 LICENSE NUMBER	A-62-70-A-I
LICENSE TYPE	Chapter 115 Minor Modification
NAIC CODES	321219
NATURE OF BUSINESS	Oriented Strand Board Manufacturer
FACILITY LOCATION	333 Station Road, Easton
DATE OF NSR LICENSE ISSUANCE	August 8, 2008

B. Modification Description and Affected Emission Equipment

Huber has requested to install a larger diesel-fired emergency generator than was originally licensed as part of Huber's Maximum Achievable Compliance Technology (MACT) Project issued through Air Emissions License, A-62-77-2-A. The Department issued Air License A-62-77-2-A to Huber on June 13, 2007 permitting the construction and initial operation of the Project. Huber is in the process of constructing the Project and anticipates an October 2008 startup. During the issuance of this license, Huber mistakenly sent the Department a heat output value of the proposed back-up diesel generator (0.86 MMBtu/hr) instead of the maximum heat input capacity of 2.6 MMBtu/hr. This minor modification under New Source Review 06-096 CMR 115 is being issued to correct this mistake.

C. Application Classification

Huber is a major source per the Maine Department of Environmental Protection's 06-096 CMR 100 regulation. The inclusion of a 2.6 MMBtu/hr back-up diesel generator (instead of a 0.86 MMBtu/hr generator) limited to 500 hours per year will result in a small increase in emissions. A new emission unit at a major source is considered a major modification based on whether or not expected emission increases exceed the "Significant Emission Increase Levels" as defined in the Department's regulations. The emissions increases for a new source are determined by the maximum future license allowed emissions, as follows:

Pollutant	Net Change (TPY)	Sig. Level
PM	0.20	25
PM10	0.20	15
SO2	0.03	40
NOx	2.85	40
CO	0.61	100
VOC	0.24	40

Therefore, the modification is minor for all pollutants. Since all emissions associated with this modification will increase, all criteria pollutants are subject to Best Available Control Technology (BACT) requirements.

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 06-096 CMR 100 of the Department's 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 new and modified units requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 CMR 100 of the Department's regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Back-up Diesel Generator #1

Back-up generators are only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. Back-up generators are not to be used for prime power when reliable offsite power is available.

Huber's project will include the installation of a new diesel fired back-up generator. The unit will be 250 kW with a maximum heat input of 2.84 MMBtu/hr and is subject to the New Source Performance Standards (NSPS) Subpart IIII.

NSPS Requirements

Huber's back-up generator is defined as any stationary internal combustion engine whose operation is limited to emergency situations and required testing and maintenance. Examples include stationary engines used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary engines used to pump water in the case of fire or flood. Stationary engines used to supply power to an electric grid or that supply power as part of a financial arrangement with another entity are not considered to be emergency engines.

Huber's back-up generator was purchased after July 11, 2005 and manufactured after April 1, 2006. Therefore, Generator #1 is subject to New Source Performance Standards 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

A summary of the NSPS/BACT analysis for the generator (2.6 MMBtu/hr) is the following:

1. Generator #1 shall fire only diesel fuel with a maximum sulfur content not to exceed 500 ppm.
2. Beginning October 1, 2010, Generator #1 shall fire only diesel fuel with a maximum sulfur content not to exceed 15 ppm.
3. Generator #1 shall be limited to 100 hr/yr of operation for maintenance checks and readiness testing. Generator #1 shall be limited to 500 hours per year of total operation. Both of these limits are based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours.
4. Generator #1 shall be equipped with a non-resettable hour meter.
5. PM, CO, and NO_x + VOC emission limits are based on emission limits set forth in 40 CFR 60, Subpart IIII.
6. Huber shall operate and maintain Generator #1 in accordance with the manufacturer's written instructions. Huber shall not change settings that are not approved in writing by the manufacturer.

7. Visible emissions from the back-up generator shall not exceed 20% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period.

C. Annual Emissions

Due to the change in the back-up generator's size and subsequent changes in the ton per year calculations, Huber's annual emissions, based on a 12 month rolling total have been modified as below:

Annual Potential Emissions from the New, Modified and Affected Emissions Units

Emission Units	Potential Emissions (tons/year)						
	PM	PM_{10}	NOx	CO	SO_2	VOC	Lead
ESP Stack (includes press, furnace, dryers, boiler)	96.33	96.33	317.28	488.74	38.27	95.49	7.2E-03
Press	--	--	--	--	--	--	--
Dryer #1 (Core)	--	--	--	--	--	--	--
Dryer #2 (Surface)	--	--	--	--	--	--	--
Dry Fuel Bin Baghouse (new)	0.97	0.97	--	--	--	3.33	--
Ink Jet Printing	--	--	--	--	--	20.68	--
Edge Spraying	--	--	--	--	--	6.46	--
Blending Forming Vents	Vent removed Phase II						
Dust & Fines Baghouse	0.96	0.96	--	--	--	5.48	--
Trim & Grade Baghouse	0.95	0.95	--	--	--	2.54	--
Sander Baghouse	0.97	0.97	--	--	--	7.04	--
Dry Fuel Bin & Baghouse	Being removed Phase I						
Secondary Dust Recovery Baghouse	Being removed Phase I						
EFB Baghouse	Being removed Phase I						
Emergency Generator	0.20	0.20	2.85	0.61	0.03	0.24	--
TOTAL	100.4	100.4	320.1	489.4	38.3	141.3	7.2E-03

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 this New Source Review Air Emission License A-62-77-3-A, pursuant to the preconstruction licensing requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

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.

SPECIFIC CONDITIONS

The following shall replace Condition (27) of the New Source Review Air Emissions License, A-62-77-2-A:

(27) Back-up Diesel Generator #1

A. Generator #1 shall fire only diesel fuel with a maximum sulfur content not to exceed 500 ppm. [40 CFR 60.4207(a)]

B. Beginning October 1, 2010, Generator #1 shall fire only diesel fuel with a maximum sulfur content not to exceed 15 ppm. [40 CFR 60.4207(b)]

C. Generator #1 shall be limited to 100 hr/yr of operation for maintenance checks and readiness testing. Generator #1 shall be limited to 500 hours per year of total operation. Both of these limits are based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours. [40 CFR 60.4211(E) and 06-096 CMR 115, BACT]

D. Generator #1 shall be equipped with a non-resettable hour meter. [40 CFR 60.4209(a)]

E. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Generator #1	PM	0.10	06-096 CMR 115, BACT

F. Emissions shall not exceed the following [40 CFR 60.4205(b)]:

Emission Unit	PM (g/kW-hr)	NO_x + VOC (g/kW-hr)	CO (g/kW-hr)
Generator #1	0.2	6.4	3.5

G. Emissions shall not exceed the following [06-096 CMR 115, BACT]:

Emission Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x + VOC (lb/hr)	CO (lb/hr)
Generator #1	0.11	0.11	0.13	3.67	2.01

H. Huber shall operate and maintain Generator #1 in accordance with the manufacturer's written instructions. Huber shall not change settings that are not approved in writing by the manufacturer. [40 CFR 60.4211(a)]

I. Visible emissions from the back-up generators shall each not exceed 20% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period. [06-096 CMR 101]

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2008.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: **July 17, 2008**
Date of application acceptance: **July 24, 2008**

Date filed with the Board of Environmental Protection _____

This Order prepared by Edwin Cousins, Bureau of Air Quality