



DEPARTMENT ORDER

**Perma Treat Corporation
Penobscot County
Mattawamkeag, Maine
A-341-71-O-M**

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

FINDINGS OF FACT

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 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Perma Treat Corporation (Perma Treat) was issued Air Emission License A-341-71-N-R on July 24, 2014, for the operation of emission sources associated with their wood products processing facility.

Perma Treat has requested a minor revision to their license in order to remove all equipment with the exception of the Tub Grinder and associated engine.

The equipment addressed in this license amendment is located at 26 Green Street, Mattawamkeag, Maine.

B. Emission Equipment

The following equipment is being removed from Perma Treat's air emission license:

Boilers

| Equipment | Maximum Capacity (MMBtu/hr) | Maximum Firing Rate (ton/hr) | Fuel Type | Date of Manuf. | Stack # |
|------------------|------------------------------------|-------------------------------------|----------------------------|-----------------------|----------------|
| Boiler #1 | 11.0 | 1.2 | wood waste & railroad ties | 1934/1995 | 1 |
| Boiler #2 | 11.0 | 1.2 | wood waste & railroad ties | 1934/1995 | 1 |
| Boiler #3 | 11.0 | 1.2 | wood waste & railroad ties | 1934/1995 | 2 |
| Boiler #4 | 11.0 | 1.2 | wood waste & railroad ties | 1934/1995 | 2 |

Engines

| Equipment | Maximum Capacity (MMBtu/hr) | Output | Fuel Type, % sulfur | Date of Manuf. |
|------------------|------------------------------------|---------------|----------------------------|-----------------------|
| Generator #1 | 2.3 | 512 kW | distillate, 0.0015% | 1974 |

Process Equipment

| Equipment | Production Rate |
|------------------|------------------------|
| Kilns (4) | 350,000 BF/yr |

C. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the issued date of this license. This amendment will not increase emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

D. Revision Description

Perma Treat's boilers (Boilers #1 - #4) have not operated in several years and are currently incapable of operating without significant capital investment. Prior to being shut down, they fired primarily chipped railroad ties.

None of the boilers were designed to burn oil in addition to biomass. Therefore, the specific non-waste determination for creosote-treated railroad ties contained in *Non-Waste Determinations for Specific Non-Hazardous Secondary Materials When Used as a Fuel*, 40 C.F.R. § 241.4(a)(7) does not apply. Burning railroad ties in these boilers would be considered combustion of a solid waste and make them subject to *Standards of Performance for Commercial and Industrial Solid Waste Incineration Units*, 40 C.F.R. Part 60, Subpart CCCC (also known as CISWI). Retrofitting the boilers to comply with the CISWI rules would be cost prohibitive. Additionally, the kilns the boilers previously heated are no longer in use. Therefore, Perma Treat has chosen to permanently take this equipment out of service.

In addition, Perma Treat has requested that Generator #1 be removed from the license. This emergency generator previously provided backup power to the boiler house. It has not run for more than three years, has had its fuel line removed, and is currently for sale for parts.

The only air emissions equipment remaining on Perma Treat's license will be the portable Tub Grinder and its associated engine. Perma Treat uses the tub grinder to chip/grind railroad ties for use off-site. The Tub Grinder Engine has a maximum heat input of

6.0 MMBtu/hr and therefore is large enough to require the air emission license be maintained.

E. Annual Emissions

1. Total Annual Emissions

Perma Treat shall be restricted to the following annual emissions, based on a calendar year total. The tons per year limits were calculated based on firing 42,000 gal/year of distillate fuel with a sulfur content of 0.0015% by weight in the Tub Grinder Engine.

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

| | PM | PM ₁₀ | SO ₂ | NO _x | CO | VOC |
|--------------------|------------|------------------|-----------------|-----------------|------------|------------|
| Tub Grinder Engine | 0.4 | 0.4 | – | 9.2 | 2.5 | 0.3 |
| Total TPY | 0.4 | 0.4 | – | 9.2 | 2.5 | 0.3 |

| Pollutant | Tons/year |
|------------|-----------|
| Single HAP | 9.9 |
| Total HAP | 24.9 |

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through ‘Tailoring’ revisions made to EPA’s *Approval and Promulgation of Implementation Plans*, 40 C.F.R. Part 52, Subpart A, § 52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 C.M.R. ch. 100, are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

The quantity of CO₂e emissions from this facility is less than 100,000 tons per year, based on the following:

- the facility’s fuel use limit;
- worst case emission factors from the following sources: U.S. EPA’s AP-42, the Intergovernmental Panel on Climate Change (IPCC), and *Mandatory Greenhouse Gas Reporting*, 40 C.F.R. Part 98; and
- global warming potentials contained in 40 C.F.R. Part 98.

No additional licensing actions to address GHG emissions are 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, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License Amendment A-341-71-O-M subject to the remaining conditions found in Air Emission License A-341-71-N-R.

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

Specific Conditions (16), (17), (19), and (22) of Air Emission License A-341-71-N-R are Deleted.

DONE AND DATED IN AUGUSTA, MAINE THIS 15 DAY OF February, 2018.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Corne for
PAUL MERCER, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-341-71-N-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 12/20/17

Date of application acceptance: 12/20/17

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

