



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PAUL MERCER
COMMISSIONER

**Lovell Lumber Company
Oxford County
Lovell, Maine
A-676-71-G-M**

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

FINDINGS OF FACT

After review of the air emission license minor revision application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Lovell Lumber Company (Lovell Lumber) was issued Air Emission License A-676-71-F-R on June 20, 2012, for the operation of emission sources associated with their sawmill and planer mill facility.

Lovell Lumber has requested a minor revision to their license in order to increase their lumber drying throughput from 4.2 million board feet per year (MMBF/yr) to 7.65 MMBF/year.

In addition, Lovell Lumber is constructing a new planer mill facility which will replace the existing facility.

The equipment addressed in this license minor revision is located at 3 Mill Street, Lovell, Maine.

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17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143

B. Emission Equipment

The following equipment is addressed in this air emission license minor revision:

Process Equipment

<u>Equipment</u>	<u>Production Rate</u>	<u>Manufacture Date</u>	<u>Installation Date</u>	<u>Pollution Control Equipment</u>
Pre-Dryer (Drying Kiln)	7.65 MMBF/yr	1981	1982	none

C. Application Classification

This amendment will increase emissions by less than 4 ton/year for each single pollutant not including greenhouse gases (GHG) and less than 8 ton/year for all pollutants combined not including GHG. Therefore, this modification is determined to be a minor revision and has been processed as such.

II. **BEST PRACTICAL TREATMENT (BPT)**

A. Minor Revision Description

Lovell Lumber currently operates a green lumber Drying Kiln with a licensed capacity to process 4.2 million board feet per year (MMBF/yr). Due to positive changes in the lumber industry and a change to the drying process which resulted in a throughput increase, Lovell Lumber has requested a minor revision in order to increase its licensed kiln throughput limit to 7.65 MMBF/yr. Lovell Lumber has been able to increase its production by air drying the lumber prior to placing it in the kiln. The air dried lumber requires less drying time allowing for a higher kiln throughput.

Lovell Lumber predominantly dries Eastern White Pine. Utilizing the emission factor of 2.26 pounds of VOC per 1000 board feet for white pine [from NCASI Emissions from Lumber Drying, Technical Bulletin 718 (07/1996)] and the annual drying production increase to 7.6 MMBF/yr; the resulting VOC emission rate is 8.65 tons VOC/year. Therefore, 8.65 tons VOC/year – 4.7 tons VOC /year equates to an increase of 3.95 tons of VOC per year. This increase in VOC emissions is less than four tons/year increase for this one regulated pollutant.

Lovell Lumber is constructing a new planer mill facility which will replace the existing facility. Once the new building is complete, the existing planer and associated equipment will be shut down and removed. The old planer facility will become a warehouse. Included in the new planer facility is a grinder building with a new cyclone separator and a new shavings bagger facility which will also have a new cyclone separator. The two

older cyclone separators will be taken out of service and replaced by two new separators. License conditions the license A-676-71-F-N (6/20/2012) will remain in effect for the new planer building and its associated equipment. The increase in production is expected to increase PM emissions by approximately 2.86 tons/year. This estimate was based on the emission equation, $E=3.59P^{0.62}$ where E=Emissions in pounds per hour and P=Process weight rate in tons per hour, in 06-096 CMR 105, *General Process Source Particulate Emission Standard*. The increase in PM emissions is less than a four tons/year increase for this one regulated pollutant. The combined VOC and PM total equates to less than 8 (eight) tons/year of total regulated pollutants.

B. Annual Emissions

Total Annual Emissions

Lovell Lumber shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits were calculated based on the following:

- 7570 tons/year of 50% moisture wood fuel in Boiler #4;
- 4500 gal/yr diesel fuel burned in Drive #2 (the equivalent of its maximum 500 hr/yr of licensed operation);
- 150,500 gal/yr diesel/distillate fuel burned in Boiler #5 (the balance of the 155,000 gal/yr diesel/distillate fuel licensed facility wide cap); and
- Annual Drying Kiln throughput of 7.65 MMBF/yr.

Total Licensed Annual Emissions for the Facility

Tons/year

(used to calculate the annual license fee)

	<u>PM</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>NO_x</u>	<u>CO</u>	<u>VOC</u>
Boiler #4	4.1	4.1	0.9	7.5	20.4	0.6
Boiler #5	1.3	1.3	0.02	1.5	0.4	0.02
Emergency Generator (Drive #2)	0.1	0.1	0.001	1.4	0.3	0.1
Drying Kiln (Kiln #1)	--	--	--	--	--	8.65
Total TPY	5.5	5.5	0.92	10.4	21.1	9.37

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient

air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

<u>Pollutant</u>	<u>Tons/Year</u>
PM ₁₀	25
SO ₂	50
NO _x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

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 Minor Revision A-676-71-G-M subject to the conditions found in Air Emission License A-676-71-F-N and the following conditions.

Severability. The invalidity or unenforceability of any provision of this License Minor Revision or part thereof shall not affect the remainder of the provision or any other provisions. This License Minor Revision 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 condition shall replace Condition (19) in Air Emission License A-676-71-F-N:

(19) Drying Kiln

- A. Lovell Lumber shall be restricted to drying in the Drying Kiln no more than 7.65 MMBF per year of lumber based on a 12-month rolling total. [06-096 CMR 115, BPT]
- B. Lovell Lumber shall maintain a record of wood drying. The record shall include the quantity of wood dried, wood species, and drying dates. The record shall be maintained on a monthly as well as a 12-month rolling total basis. [06-096 CMR 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 29 DAY OF June, 2016.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Come for
PAUL MERCER, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-676-71-F-N.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: April 29, 2016

Date of application acceptance: May 5, 2016

Date filed with the Board of Environmental Protection:

This Order prepared by Lisa P. Higgins, Bureau of Air Quality.

