



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE  
GOVERNOR

JAMES P. BROOKS  
ACTING COMMISSIONER

**Hancock Lumber Company, Inc.**  
**Somerset County**  
**Pittsfield, Maine**  
**A-932-71-B-R**

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

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., §344 and §590, the Department finds the following facts:

**I. REGISTRATION**

A. Introduction

1. Hancock Lumber Company, Inc. (Hancock) has applied to renew their Air Emission License permitting the operation of emission sources associated with their lumber mill.
2. The equipment addressed in this license is located at 407 Stinson Street, Pittsfield.

B. Emission Equipment

The following equipment is addressed in this air emission license:

**Fuel Burning Equipment**

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (Tons/Hour)</u>	<u>Fuel Type</u>	<u>Stack #</u>
Boiler #1	12.6	1.4	Sawdust and trim ends	1

**Process Equipment**

<u>Equipment</u>	<u>Production Rate</u>	<u>Pollution Control Equipment</u>
Drying Kilns (6)	29 MMBF/year	None

AUGUSTA  
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 04679-2094  
(207) 764-0477 FAX: (207) 760-3143

C. Application Classification

The application for Hancock does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of current licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended).

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 *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Boiler #1

Boiler #1 was manufactured by Industrial Boiler Inc. in 1985. The maximum heat input for Boiler #1 is 12.6 MMBtu/hour firing wood (sawdust and trim ends). Hancock uses fly ash reinjection for control of particulate matter from Boiler #1.

The Boiler #1 was modified after 1989 and is therefore subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989.

A summary of the BPT analysis for Boiler #1 is the following:

1. Hancock shall fire only wood (sawdust and trim ends) in Boiler #1.
2. Hancock shall use the following formula, when necessary, to convert fuel use records to 50% moisture:

$$\text{Tons Wood at 50\%} = (\text{Tons Wood at M\%}) \times [(100-M)/50]$$

where M = the moisture content of the actual wood fired

3. Hancock shall continuously operate the fly ash reinjection system on Boiler #1 when the Boiler is in operation.
4. *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 (as amended) regulates PM emission limits. A BACT analysis for PM determined a more stringent limit of 0.33 lb/MMBtu was appropriate and shall be used. The PM<sub>10</sub> limits are derived from the PM limits.
5. SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC emission limits are based upon AP-42 data dated 9/03.
6. Visible emissions from Boiler #1 shall not exceed 30 percent 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. Degreaser Unit

Hancock operates a degreaser unit with a design capacity of 5 gallons which uses diesel fuel as a solvent. Records shall be kept of the solvent added and removed.

D. Kilns

Hancock operates a total of six kilns for drying lumber. Heat for the kilns is provided by Boiler #1. The Department is not aware of any commercially available equipment for the control of VOCs from drying kilns, therefore BPT for the kilns is determined to be a yearly throughput limit of 29.0 million board feet based on a calendar year.

E. Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20 percent opacity, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15) second opacity observations which exceed 20 percent in any one hour.

F. Annual Emissions

Hancock shall be restricted to the following annual emissions, based on a calendar year:

**Total Licensed Annual Emissions for the Facility**

**Tons per year**

(Used to calculate the annual license fee)

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
Boiler #1	18.2	18.2	1.4	12.1	33.1	0.9
Kilns	-	-	-	-	-	32.8

<b>Total TPY</b>	<b>18.2</b>	<b>18.2</b>	<b>1.4</b>	<b>12.1</b>	<b>33.1</b>	<b>33.7</b>
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**III. AMBIENT AIR QUALITY ANALYSIS**

According to 06-096 CMR 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Modeling and monitoring are not required for a renewal if the total emissions of any pollutant released do not exceed the following:

<b>Pollutant</b>	<b>Tons/Year</b>
PM	25
PM <sub>10</sub>	25
SO <sub>2</sub>	50
NO <sub>x</sub>	100
CO	250

Based on the total facility licensed emissions, Hancock is below the emissions level required for modeling and monitoring.

**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-932-71-B-R subject to 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.

#### STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S.A. §347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [06-096 CMR 115]
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 CMR 115]
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353. [06-096 CMR 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]

- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
  - A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
    1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
    2. pursuant to any other requirement of this license to perform stack testing.
  - B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
  - C. submit a written report to the Department within thirty (30) days from date of test completion.[06-096 CMR 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
  - A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

- B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
- C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 CMR 115]

- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

#### **SPECIFIC CONDITIONS**

(16) **Boiler #1**

- A. Hancock shall fire only wood (sawdust and trim ends) in Boiler #1. [06-096 CMR 115, BPT]

B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.33	06-096 CMR 103, BPT

C. Emissions shall not exceed the following [MEDEP Chapter 115, BPT]:

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	4.16	4.16	0.32	2.77	7.56	0.21

D. Hancock shall continuously operate fly ash reinjection on Boiler #1 whenever Boiler #1 is in operation. [06-096 CMR 115, BPT]

E. Visible emissions from Boiler #1 shall not exceed 30 percent 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]

(17) **New Source Performance Standards for Dc Boilers**

Boiler #1 is subject to Federal New Source Performance Standards, Subpart Dc. Hancock shall comply with all requirements of 40 CFR Part 60, Subpart Dc including, but not limited to, the following:

- A. Hancock shall record and maintain records of the amounts of each fuel combusted on a monthly basis.
- B. The following address for EPA shall be used for any reports or notifications required to be copied to them:

Compliance Clerk  
USEPA Region 1  
1 Congress Street  
Suite 1100  
Boston, MA 02114-2023

(18) **Kilns**

- A. Hancock shall not exceed a yearly throughput of 29.0 million board feet per year based on a calendar year. [06-096 CMR 115, BPT]
- B. Hancock shall keep monthly records of board feet processed. [06-096 CMR 115, BPT]

(19) **Parts Washer**

Parts washers at Hancock are subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended).

- A. Hancock shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]
- B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 130]:
  1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
  2. Wipe cleaning; and,
  3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
- C. The following standards apply to cold cleaning machines that are applicable sources under Chapter 130.
  1. Hancock shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
    - (i) Waste solvent shall be collected and stored in closed containers.
    - (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
    - (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
    - (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
    - (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.
    - (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
    - (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material shall be immediately stored in covered containers.
    - (viii) Work area fans shall not blow across the opening of the degreaser unit.
    - (ix) The solvent level shall not exceed the fill line.
  2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

(20) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20 percent opacity, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20 percent in any one (1) hour. [06-096 CMR 101]

(21) **General Process Sources**

Visible emissions from any general process source shall not exceed an opacity of 20 percent 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. [06-096 CMR 101]

(22) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department; or
- 2) A written emission statement containing the information required in 06-096 CMR 137.

The emission statement must be submitted as specified by the date in 06-096 CMR 137.

(23) **Air Toxics Emission Statement**

If Hancock exceeds the thresholds for HAPs listed in Appendix A of 06-096 CMR 137 in an inventory year, in accordance with 06-096 CMR 137, the licensee shall report, no later than May 15th every three years (2011, 2014, 2017, etc.) or as otherwise stated in Chapter 137, the information necessary to accurately update the State's Toxic Air Pollutants Emission Inventory by means of a emission statement containing the information required in 06-096 CMR 137.

NOTE: Based on emission factors developed by the Eastern Research Group (ERG) in their memo "Development of Average Emission Factors and Baseline Emission Estimates for the Industrial, Commercial and Institutional Boilers and Process Heaters National Emission Standard for Hazardous Air Pollutants" dated October 2002, Hancock will most likely exceed the Chapter 137 thresholds of

Hancock Lumber Company, Inc.  
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HAPs based on fuel burning alone should the facility exceed the firing of 1,403 tons of wood in a calendar year.

Reports and questions on the Air Toxics Emissions Inventory portion should be directed to:

Toxics Inventory Coordinator,  
Maine DEP,  
Bureau of Air Quality,  
17 State House Station,  
Augusta, ME 04330-0017

Telephone: (207) 287-2437

- (24) Hancock shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 31<sup>st</sup> DAY OF January, 2011.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brooks  
JAMES P. BROOKS, ACTING COMMISSIONER

**The term of this license shall be five (5) years from the signature date above.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 09/23/2010

Date of application acceptance: 10/13/2010

Date filed with the Board of Environmental Protection:

This Order prepared by N. Lynn Cornfield, Bureau of Air Quality.

