



DEPARTMENT ORDER

Player Holdings, LLC
Aroostook County
Ashland, Maine
A-1155-71-B-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

Player Holdings, LLC (MaineFlame) was issued Air Emission License A-1155-71-A-N on February 25, 2021, for the operation of emission sources associated with their extruded log manufacturing facility.

MaineFlame has requested a minor revision to their license in order to clarify the timing requirements pertaining to stack testing.

The equipment addressed in this license is located at 86 Clark Siding Road, Ashland, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Fuel Burning Equipment

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type, % sulfur	Date of Manuf.	Date of Install.	Stack #
Burner #1	13.7*	3,043 lb/hr*	Biomass	2020	2021	Stack #1

*Based on firing biomass with a moisture content of 50% by weight.

C. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the date this license was issued.

This amendment will not increase licensed emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

D. Facility Classification

The facility is licensed as follows:

- As a natural minor source of air emissions, because no license restrictions are necessary to keep facility emissions below major source thresholds for criteria pollutants; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

II. **EXPLANATION OF LICENSE CLARIFICATIONS**

A. Performance Testing

MaineFlame has requested that the timing requirements of performance testing be clarified. In Air Emission License A-1155-71-A-N, an initial performance test was required within 180 days of startup and subsequent testing was to be completed within a period of 1 year for each regulated pollutant that tests above 75% of its emission limit as defined in this air emission license, and every 5 years for all regulated pollutants. To clarify the timing requirements and to allow the facility more flexibility in scheduling a stack testing subcontractor, the language will be changed as follows:

Subsequent testing shall be completed on the following schedule:

- Testing shall be conducted by December 31st of the fifth calendar year following completion of the most recent performance test for each pollutant for which compliance was demonstrated at a level at or below 75% of the licensed limit.
- Testing shall be conducted by December 31st of the next calendar year following completion of the most recent performance test for each pollutant for which compliance was demonstrated at a level above 75% of the licensed limit.
- MaineFlame's air emission license requires more immediate retesting, in accordance with Standard Condition (12), for any pollutant that the most recent performance test shows is emitted above the licensed limit.

B. Performance Test Protocol

For any performance testing required by this license, MaineFlame shall submit to the Department for approval a performance test protocol, as outlined in the Department's Performance Testing Guidance, at least 30 days prior to the scheduled date of the performance test. [06-096 C.M.R. ch. 115, BPT]

The Department's Performance Testing Guidance is available online at:

<https://www.maine.gov/dep/air/emissions/testing.html>

C. Annual Emissions

This license amendment will not change the facility's licensed annual emissions.

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-1155-71-B-M subject to the conditions found in Air Emission License A-1155-71-A-N and the following conditions.

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

The following shall replace Specific Condition (17)(O) of Air Emission License A-1155-71-A-N.

(17) Burner #1 and Dryer #1

O. Performance Testing

Within 180 days of initial startup of Burner #1 and Dryer #1, MaineFlame shall conduct performance tests on Stack #1 for PM, PM₁₀, PM_{2.5}, NO_x, CO, VOC, and visible emissions to demonstrate compliance with the licensed emission limits (lb/hr and percent opacity, as appropriate) using EPA stack test methods specified in the table below or other methods approved by the Department.

Pollutant	EPA Test Method
PM	Method 5
PM ₁₀	Method 201 or 201A and Method 202
PM _{2.5}	Method 201A and Method 202
NO _x	Method 7E
CO	Method 10
VOC	Method 25A
Visible Emissions	Method 9

1. Performance testing shall be conducted under normal operating conditions. MaineFlame shall measure and record the amount of biomass fired (i.e., tons and moisture content) in Burner #1 during each test run for all pollutants. MaineFlame shall record the amount of wood dried (i.e., tons of dry wood produced) during each test run for PM, PM₁₀, PM_{2.5}, and VOC.
2. Subsequent performance testing shall be completed on the following schedule:
 - Testing shall be conducted by December 31st of the fifth calendar year following completion of the most recent performance test for each pollutant for which compliance was demonstrated at a level at or below 75% of the licensed limit.
 - Testing shall be conducted by December 31st of the next calendar year following completion of the most recent performance test for each pollutant for which compliance was demonstrated at a level above 75% of the licensed limit.
 - MaineFlame's air emission license requires more immediate retesting, in accordance with Standard Condition (12), for any pollutant that the most recent performance test shows is emitted above the licensed limit.

Testing methods shall be the same as the methods prescribed in MaineFlame's air emission license for the initial performance tests.

If the facility is not operating such that, in the Department's determination, required testing cannot reasonably be completed before the testing due date, then testing shall be completed within 60 days after the facility re-starts.

[06-096 C.M.R. ch. 115, BACT]

The following are new conditions of Air Emission License A-1155-71-A-N.

(24) Performance Test Protocol

For any performance testing required by this license, MaineFlame shall submit to the Department for approval a performance test protocol, as outlined in the Department's Performance Testing Guidance, at least 30 days prior to the scheduled date of the performance test. [06-096 C.M.R. ch. 115, BPT]

- (25)** If the Department determines that any parameter value pertaining to construction and operation of the proposed emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, MaineFlame may be required to submit additional information. Upon written request from the Department, MaineFlame shall provide information necessary to demonstrate AAQS will not be exceeded, potentially including submission of an ambient air quality impact analysis or an application to amend this air emission license to resolve

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any deficiencies and ensure compliance with AAQS. Submission of this information is due within 60 days of the Department's written request unless otherwise stated in the Department's letter. [06-096 C.M.R. ch. 115, § 2(O)]

DONE AND DATED IN AUGUSTA, MAINE THIS 28th DAY OF OCTOBER, 2022.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-1155-71-A-N.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/14/22

Date of application acceptance: 10/14/22

Date filed with the Board of Environmental Protection:

This Order prepared by Chris Ham, Bureau of Air Quality.

