



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**Fraser Timber LLC
Aroostook County
Masardis, Maine
A-165-77-1-A**

**Departmental
Findings of Fact and Order
New Source Review
NSR #1**

FINDINGS OF FACT

After review of the air emissions 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 Annotated (M.R.S.A.), Section 344 and Section 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Fraser Timber LLC
LICENSE TYPE	06-096 CMR 115, Minor Modification
NAICS CODES	321113, 321999
NATURE OF BUSINESS	Lumber Manufacturer
FACILITY LOCATION	Rt 11, Masardis, Maine

B. Amendment Description

Fraser Timber LLC (Fraser) wishes to install and operate a finger jointer line. The finger jointer line uses glue to joint smaller blocks of lumber together to produce a saleable product.

C. Application Classification

The application submitted by Fraser does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping. It does seek to address a Best Available Control Technology (BACT) analysis for the finger jointer operation.

The proposed revision will not change the facility's emission limits. Therefore, this amendment is determined to be a minor modification under *Minor and Major Source Air Emission License Regulations* 06-096 CMR 115 (as amended) since the changes being made are not addressed or prohibited in the Part 70 air emission

license. Fraser has requested that the requirements of this amendment be included in their pending Part 70 air emission license renewal.

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

B. Finger Jointer Operation

It is estimated the finger jointer line would use approximately 30-35,000 lbs per year of glue. The SDS (safety data sheet) for the glue used shows it contains no volatile organic compounds (VOCs). However, the glue does contain up to 25% of 4, 4 – methylenediphenyl diisocyanate (MDI) which is a hazardous air pollutant (HAP).

The finger jointer line is a cold operation, meaning no heat is added as part of the process. Due to the very low volatility of MDI and the fact that most of the glue joint is covered, all but trace amounts of the MDI in the glue are encapsulated or otherwise remain with the product. (Reference: *Dispersion Wood Glues*, Technical Committee on Wood Adhesives of Industrieverband Klebstoffe, November 2004)

Assuming an emission factor of 2% of the MDI in the wood used is considered conservative. Provided Fraser does not exceed glue usage of 40,000 lb/year, emissions of MDI from this process will be limited to less than 200 lb/year which is below the inventory reporting threshold for MDI.

The fingers in the wood are made by enclosed heads and the sawdust is captured by a blower system that pneumatically transfers it to a storage hut via use of a cyclone.

Visible emissions from the finger jointer cyclone shall not exceed an opacity of 20% 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.

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-165-77-1-A pursuant to the preconstruction licensing requirements of 06-096 CMR 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

(1) Finger Jointer Operation

- A. Fraser shall not exceed the usage of 40,000 lb/year (on a 12-month rolling total) of glue for the finger jointer line. The glue used on the finger jointer line shall contain a maximum of 25% MDI. Compliance shall be demonstrated by records of glue usage (on a monthly and 12-month rolling total) and copies of the SDS for the glue. [06-096 CMR 115, BACT]

Fraser Timber LLC
Aroostook County
Masardis, Maine
A-165-77-1-A

4

Departmental
Findings of Fact and Order
New Source Review
NSR #1

- B. Visible emissions from the finger jointer cyclone shall not exceed an opacity of 20% 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]

DONE AND DATED IN AUGUSTA, MAINE THIS 6 DAY OF January, 2014.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Patricia W. Aho*
PATRICIA W. AHO, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 12/9/13

Date of application acceptance: 12/10/13

Date filed with the Board of Environmental Protection:

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

