



DEPARTMENT ORDER

**DuPont Nutrition USA, Inc.
Knox County
Rockland, Maine
A-366-70-H-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #1**

FINDINGS OF FACT

After review of the Part 70 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

FACILITY	DuPont Nutrition USA, Inc. (DuPont)
LICENSE TYPE	Part 70 Administrative Revision
NAICS CODES	311999, 325412
NATURE OF BUSINESS	Refined Hydrocolloid Products
FACILITY LOCATION	Crocketts Point, Rockland

DuPont is a manufacturer of carrageenan, clarified locust bean gum, and other hydrocolloids used mostly as food additives. DuPont also manufactures agarose for use in molecular biology.

DuPont has the potential to emit more than 100 tons per year (tpy) of sulfur dioxide (SO₂) and nitrogen oxides (NO_x), and more than 50 tpy of volatile organic compounds (VOC). Therefore, DuPont is a major source for criteria pollutants.

DuPont does not have the potential to emit 10 tpy or more of a single hazardous air pollutant (HAP) or 25 tpy or more of combined HAP and is therefore considered an area source for HAP.

B. Revision Description

DuPont has requested a Part 70 Administrative Revision to make the following changes:

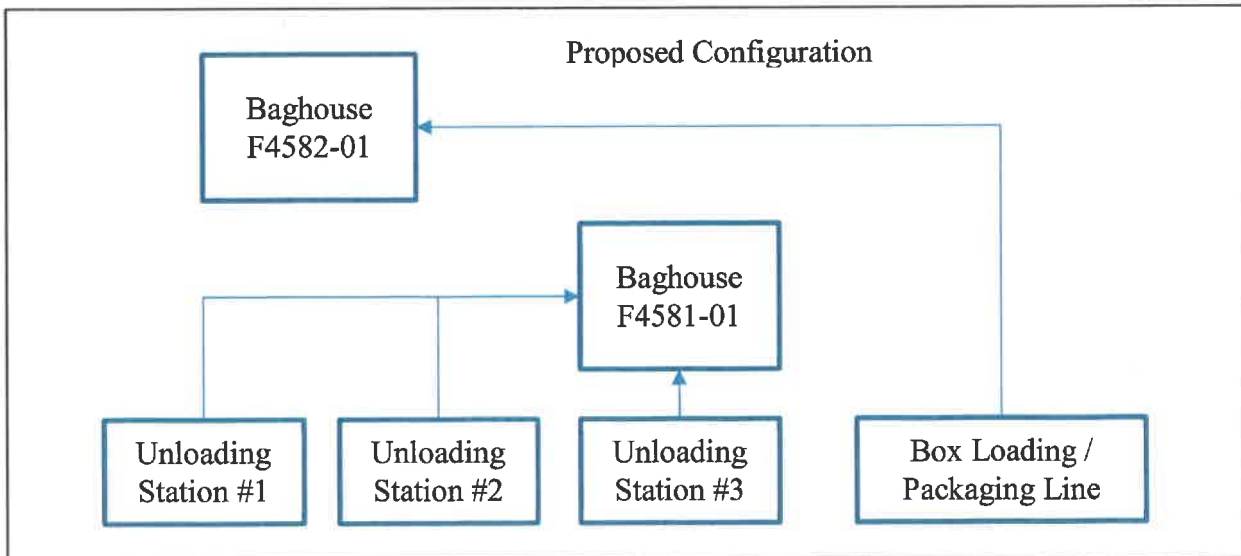
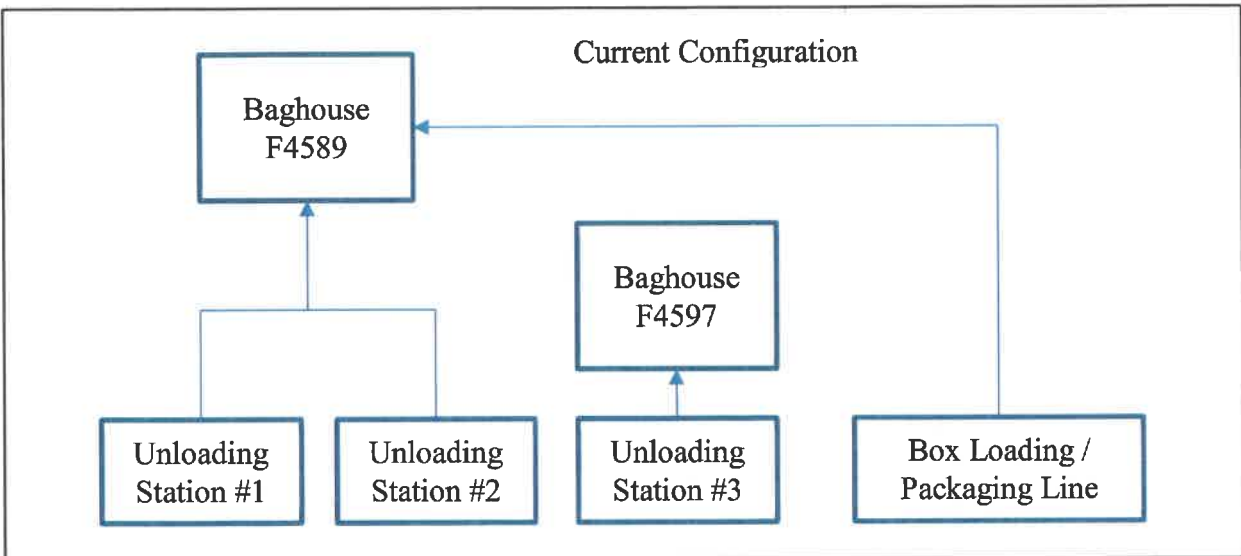
1. Building 13 Blending Facility

DuPont has a number of bag/tote unloading stations that are controlled by baghouses before exhausting outside the building.

Baghouse F4589 currently collects and controls dust off of two bag unloading stations as well as from pickup points along the Box Loading/Packaging Line. DuPont has proposed replacing this control unit with a new baghouse (F4582-01). Additionally, this baghouse will only control emissions from the pickup points along the Box Loading/Packaging Line. Control of the bag unloading stations is described further below.

Baghouse F4597 currently collects and controls dust off of one bag unloading station. DuPont has proposed replacing this control unit with a new baghouse (F4581-01) and routing all three bag unloading stations to this new baghouse.

The diagrams below show the proposed revisions to the control equipment.



Both new baghouses are designed to achieve 99.98% control of filterable PM and will be equipped with bag leak detectors as required by the current license.

The Department finds that the replacement and realignment of the baghouses in DuPont's particulate matter control system shall continue to meet or exceed the control requirements for the Blending and Packaging System and the Blending Product Conveyor System. This change will not result in any increase in emissions, either actual or potential. Additionally, no changes are required to any license conditions.

2. Minor Corrections

On page 3 of air emission license A-366-70-G-R/A, there is a typo in the asset number listed for Unit #1, Lime Unloading. The asset number should be listed as E3025 and not E3205.

On page 3 of air emission license A-366-70-G-R/A, Unit #6, FID Hydrocolloids Isopropanol Process lists scrubber E2460 as an isopropanol (IPA) scrubber. This scrubber is in fact an acid scrubber which is considered an insignificant activity. Therefore, reference to E2460 should be removed from this table. There is a third IPA scrubber (E2535) on site, but this equipment is physically blanked off and not used as part of the process.

The permit shield table listed on page 38 of air emission license A-366-70-G-R/A incorrectly lists B5 Generator as less than 3.0 MMBtu/hr and therefore not subject to *Fuel Burning Equipment Particulate Emission Standard*, 06-096 C.M.R. ch. 103. This generator is correctly listed as 6.0 MMBtu/hr throughout the rest of the license and with the appropriate particulate emission standard.

The following baghouses associated with the Central Vacuum System were inadvertently left out of the process equipment lists on pages 3, 33, and 56.

Equipment (Asset #)	Pollution Control Equipment	Exhaust ID
Central Vacuum System (45801)	Baghouse	13-10
Central Vacuum System (45790)	Baghouse	7A-3

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.

A Part 70 Administrative Revision is for license changes that correct typographical errors; change the name, address, or phone number of any person or facility identified in the Part 70 license or a similar administrative change at the Part 70 source; or result in more frequent monitoring, reporting, recordkeeping or testing requirements. As stated in *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140, § 7(A)(5), a Part 70 Administrative Revision may also be used for any other type of change which the Department determines to be similar.

The requested revision to replace and reconfigure the baghouses and the correction of typographical errors meets the definition of a Part 70 Administrative Revision and has been processed under *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

D. Facility Annual Emissions

This administrative revision will not change licensed emissions of any regulated pollutant.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this source:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards; and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License Amendment A-366-70-H-A pursuant to 06-096 C.M.R. 140 and the preconstruction permitting requirements of *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 and subject to the conditions found in Air Emission License A-366-70-G-R/A and the following conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 C.M.R. ch. 115 for making such changes and pursuant to the applicable requirements in 06-096 C.M.R. ch. 140.

For each specific condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

Severability. The invalidity or unenforceability of any provision of this License or part thereof 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 STATEMENTS

The following shall replace Standard Statement (6) of Air Emission License A-366-70-G-R/A:

- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
 - A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or affect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee.

Source	Citation	Description	Basis for Determination
Boilers #3, 4, 5	06-096 C.M.R. ch. 134	Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds (VOC RACT)	Combustion sources exempt per 06-096 C.M.R. ch. 134 § (1)(C)(4).
Boilers #3, 4, 5	40 C.F.R. Part 60, Subpart Dc	Standards of Performance Small Industrial-Commercial Steam Generating Units	These boilers commenced construction prior to June 9, 1989
Boilers #3, 4, 5	40 C.F.R. Part 63, Subpart DDDDD	NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	Facility is not a major source of HAP
Boilers #3, 4, 5	40 C.F.R. Part 63, Subpart JJJJJ	NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources	Provided distillate is only fired for periods of gas curtailment, gas supply interruption, or periodic testing on liquid fuel. If distillate is fired for other reasons, the affected boiler(s) could become subject to Subpart JJJJJ.

SPECIFIC CONDITIONS

The following shall replace Specific Condition (17) of Air Emission License A-366-70-G-R/A:

(17) PM Emissions from Process Equipment

A. DuPont shall maintain and operate controls for particulate matter on the following equipment:

Equipment ID	Pollution Control Equipment
#1, Lime Unloading	Baghouse
#3, Weed Cleaning System	Baghouse
#4, Perlite Unloading	Baghouse
#5, Cook Vent Filtration System	Cyclone
#7, Vacuum System for Belt Dryer Area	Baghouse
#8, Grinder Feed System	Baghouse
#9, A44 Grinder System	Baghouse
#10, ACM 60 Grinder System	Baghouse
#11, Tote Dumper System	Baghouse
#12, Blending Product Conveyor System	Baghouse
#13, Blending Area & Vacuum System	Baghouse
#14, Bulk Bag Filling System	Baghouse
#16, Specialty Blender System	Baghouse
#29, Blending & Packaging System	Baghouses
#18, Agarose Grinding Process	Baghouse
#30, Central Vacuum System	Baghouses

[06-096 C.M.R. ch. 140, BPT] **Enforceable by State-only**

B. Visible emissions from any general process source, including baghouses and cyclones, shall not exceed 20% opacity on a six-minute block average basis. Compliance with this visible emission limit shall be demonstrated in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 upon request by the Department. [06-096 C.M.R. ch. 140, BPT]

C. Periodic Monitoring

DuPont shall monitor and record the following periodic monitors for Process PM emissions [06-096 C.M.R. ch. 140, BPT]:

1. Records of monthly inspections of each baghouse and cyclone.
2. Records of any baghouse or cyclone malfunction and all maintenance activities.

D. Parameter Monitoring

DuPont shall operate bag leak detectors on all of the baghouses. The bag leak detectors shall be operated continuously and records maintained indicating the date and time of any alarms and resulting corrective actions or response. These events are not considered deviations provided DuPont responds to an alarm by either determining that the baghouse did not malfunction (i.e., false alarm) and no corrective action is necessary or by immediately shutting down the process. These monitors are included in DuPont's CAM plan. [40 C.F.R. Part 64]

DONE AND DATED IN AUGUSTA, MAINE THIS 19 DAY OF October, 2018.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Paul Mercer*
PAUL MERCER, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-366-70-G-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/2/2018

Date of application acceptance: 10/4/2018

Date filed with the Board of Environmental Protection:

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

