STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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DEPARTMENT ORDER

Danisco USA Inc. **Knox County** **Rockland, Maine** **A-366-77-10-A**	**Departmental** **Findings of Fact and Order** **Air Emission License** **NSR #10**

Findings of Fact

After review of the air emission license 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 (the Department) finds the following facts:

I. Registration

A. Introduction

Facility	Danisco USA Inc.
License Type	06-096 C.M.R. ch. 115, Minor Modification
NAICS Codes	311999, 325412
Nature of Business	Refined Hydrocolloid Products
Facility Location	Crocketts Point, Rockland

This license completes the processing of the application with submission number 603161 as assigned by the Department (accepted 03/30/2026).

B. NSR License Description

Danisco USA Inc. (Danisco) has requested a New Source Review (NSR) license to address the addition of a pneumatic sodium chloride unloading system.

C. Emission Equipment

The following equipment is addressed in this NSR license:

Process Equipment

Equipment	Production Rate	Pollution Control Equipment	Stack #
Bulk Salt Unloading System	200,000 lb/year	Cartridge Filters	15-3

D. 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.

The application for the addition of the Bulk Salt Unloading System does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements.

The modification of a major source is considered a major or minor modification based on whether or not expected emissions increases exceed the "Significant Emission Increase" levels as given in *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100. For a major stationary source, the expected emissions increase from each new, modified, or affected unit may be calculated as equal to the difference between the post-modification projected actual emissions and the baseline actual emissions for each NSR regulated pollutant.

1. Baseline Actual Emissions

   Baseline actual emissions (BAE) for existing affected emission units are equal to the average annual emissions from any consecutive 24-month period within the ten years prior to submittal of a complete license application. The selected 24-month baseline period can differ on a pollutant-by-pollutant basis. However, there are no existing emission units which are considered "affected" by this project.

   The only equipment addressed by this license are new emission units. Baseline actual emissions for new equipment are considered to be zero for all pollutants; therefore, the selection of a baseline year is unnecessary.

2. Projected Actual Emissions

   New emission units must use potential to emit (PTE) emissions for projected actual emissions (PAE). Those emissions are presented in the following table. Projected Actual Emissions from the Bulk Salk Unloading system is considered unquantifiable and therefore considered zero for this analysis.

3. Emissions Increases

   There are no new quantifiable emissions associated with this project.

4. Classification

Since emissions increases do not exceed significant emissions increase levels, this NSR license is determined to be a minor modification under *Minor and Major Source Air Emission License Regulations,* 06-096 C.M.R. ch. 115.

This NSR license is not licensing a new major stationary source of an NSR pollutant that is not greenhouse gases (GHG) nor is it authorizing a major modification for an NSR pollutant to an existing major stationary source. Therefore, greenhouse gases are not considered subject to regulation in this license pursuant to 40 C.F.R. §§ 51.166(b)(48)(iii - iv).

Danisco has submitted an application to incorporate the requirements of this NSR license into the facility's Part 70 air emission license.

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 C.M.R. ch. 100. 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 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

B. Bulk Salt Unloading System

1. Equipment Description

Danisco is proposing to install a bulk food-grade salt unloading system in Building 15 with anticipated installation in mid-2026. The proposed system will unload bulk food grade salt pneumatically through enclosed piping via the delivery truck's blower. The salt will discharge from the truck into a receiving hopper and then be used further in the facility processes. The majority of the transported salt will fall out of suspension into the hopper, with a small amount being carried along with the exhaust air. The exhaust air will then pass through a dust collection system consisting of 4 cartridge filters in series. The filters will be periodically cleaned by compressed air pulses similar to a pulsed-jet baghouse. The filters have a total area of 200

sq/ft of media. Emissions through the filters when maintained properly are not expected to exceed 0.010 grains per dry standard cubic foot based on $PM_{2.5}$ testing from the manufacturer. The salt blown off the cartridges will drop into the receiving hopper, and the filtered air will exhaust outside to atmosphere. A broken bag detector will be installed in the exhaust discharge piping and wired into the distributed control system and alarm notification panel. Anticipated salt throughput through the proposed unit is projected at ~200,000 lbs/year. Emissions are considered unquantifiable upon exhaust from the cartridge filter exhaust controls.

2. BACT Discussion

   Danisco performed a BACT analysis where several control strategies were examined for the control of particulate matter emissions from the Bulk Salt Unloading System.

   Control options evaluated include the use of cartridge filters/baghouse, the total enclosure of the Bulk Salt Unloading System, electrostatic precipitation, wet scrubbers, and cyclone separators. For the Bulk Salt Unloading System, BACT was determined to be the use of cartridge filters for particulate matter control with a collection efficiency of 99% or greater and to be equipped with a filter leak detection system.

   Additionally, Danisco shall operate all equipment associated with the Bulk Salt Unloading System according to its manufacturers' written instructions or Danisco's written operating procedures. A copy of those instructions or procedures shall be provided to the Department upon request.

3. Emissions

   The Department considers the emissions from this process to be unquantifiable.

4. Visible Emissions

   Visible emissions from the Bulk Salt Unloading System shall not exceed 10% on a six-minute block average basis. The Bulk Salt Unloading System shall be maintained so as to prevent fugitive visible emissions.

5. Regulatory Requirements

   There are no federal or state regulations that specifically apply to the activity described above.

C. Incorporation Into the Part 70 Air Emission License

Pursuant to *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140 § 1(C)(8), for a modification at the facility that has undergone NSR requirements or been processed through 06-096 C.M.R. ch. 115, the source must apply for an amendment to their Part 70 license within one year of commencing the proposed operations, as provided in 40 C.F.R. Part 70.5. An application to incorporate the requirements of this NSR license into the Part 70 air emission license has been submitted to the Department.

D. Annual Emissions

This license 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,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants New Source Review License A-366-77-10-A pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the specific conditions below.

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.

Specific Conditions

(1) **Bulk Salt Unloading System**

A. The Bulk Salt Unloading System is licensed to convey salt only. [06-096 C.M.R. ch. 115, BACT]

B. The Bulk Salt Unloading System shall be equipped with a cartridge filter system with a collection efficiency of 99% or greater. [06-096 C.M.R. ch. 115, BACT]

C. The cartridge filter system shall be equipped with a filter leak detection and alarm system.
[06-096 C.M.R. ch. 115, BACT]

D. Danisco shall operate all equipment associated with the Bulk Salt Unloading System according to its manufacturers' written instructions or Danisco's written operating procedures. A copy of those instructions or procedures shall be provided to the Department upon request. [06-096 C.M.R. ch. 115, BACT]

E. Danisco shall maintain the Bulk Salt Unloading System so as to prevent all fugitive emissions [06-096 C.M.R. ch. 115, BACT]

F. Visible emissions from the Bulk Salt Unloading System shall not exceed 10% on a six-minute block average basis.
[06-096 C.M.R. ch. 101]

(2) **Additional Information**

If the Department determines that any parameter value pertaining to construction and operation of the 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, Danisco may be required to submit additional information. Upon written request from the Department, Danisco shall provide information necessary to demonstrate ambient air quality standards (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 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)]

(3) **Approval to Construct**

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 C.M.R. ch. 115]

Done and Dated in Augusta, Maine this 1st day of JULY, 2026.

Department of Environmental Protection

BY:_____
for Melanie Loyzim, Commissioner

Please note attached sheet for guidance on appeal procedures.

Date of initial receipt of application: 3/24/26
Date of application acceptance: 3/30/26

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