



DEPARTMENT ORDER

**Irving Forest Products, Inc.**  
**Oxford County**  
**Dixfield, Maine**  
**A-409-70-G-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	Irving Forest Products, Inc.
LICENSE TYPE	Part 70 Significant License Modification
NAICS CODES	321912, 321113, 321999
NATURE OF BUSINESS	Lumber Manufacturer
FACILITY LOCATION	24 Hall Hill Road, Dixfield, Maine

Irving Forest Products, Inc. (IFP) is a manufacturer of kiln-dried pine lumber. The facility consists of a sawmill, a planer mill, drying kilns, three boilers, fuel storage, and a maintenance garage.

New Source Review (NSR) license A-409-77-4-M (issued 2/24/2020) addressed replacement of the Planer Mill and some components of the facility's dust and shavings collection system. Changes also included improvements in process flow, upgrades to the trimming and finishing area, and process improvements and consolidation of the Remanufacturing, Value-Added, and Specialty Mill areas. This work is referred to collectively as the Planer Mill Project. IFP has requested that the provisions of the NSR license be incorporated into their Part 70 license.

## B. Emission Equipment

The following equipment was removed or replaced by new equipment identified in a following table:

### Process Equipment

Equipment	Throughput*
Cyclone #1 (Value Added Shavings)	6,000 tpy
Cyclone #2 (Planer Mill Shavings)	25,000 tpy
Cyclone #3 (Bagger Silo)	25,000 tpy
Cyclone #4 (Shavings Hopper)	25,000 tpy

The following equipment was changed as part of the Planer Mill Project:

Equipment	Throughput*
Cyclone #5 (Planer Mill Hog and VA Mill Truck Bin)	13,000 tpy

The following new equipment was added as part of the Planer Mill Project:

Equipment	Throughput*
Cyclone #1A (Specialty Mill)	6,000 tpy
Cyclone #2A & 2B (Planer Mill Shavings)	25,000 tpy
Cyclone #3A (Shavings Silo)	25,000 tpy
Cyclone #4A (Shavings Truck Bin)	25,000 tpy

\*The listed throughputs represent typical process throughput rates, not the maximum load rating of the cyclones.

## 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.

IFP has requested incorporation into the Part 70 Air License the relevant terms and conditions of NSR license A-409-77-4-M issued 2/24/2020 pursuant to *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115. Therefore, this license application was considered a Part 70 Significant License Modification and processed under *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

#### D. Project Description

The Planer Mill Project involves changes to the facility's dust and shavings collection system.

Cyclone #1 which served the Value Added (VA) Shop was removed in May 2019. Cyclones #2, #3, and #4 were decommissioned in February 2020.

Cyclone #1A serves the Specialty Mill and receives primarily shavings from the Specialty Mill's molder. The discharge of Cyclone #1A is injected into the high-pressure line prior to a two-way valve which directs material to either Cyclone #3A or #4A.

Cyclone #2 was replaced by a "two-pack, high-efficiency, cyclone complex," designated Cyclone #2A & 2B. This area is the converging point for the Planer Mill shavings and Planer Mill trim saw. This cyclone complex includes an inlet splitter section and two high-efficiency cyclones that operate in parallel. The exhaust of Cyclone #2A & 2B is drawn through ductwork by an induced draft fan and then discharged to atmosphere.

Cyclone #3 serving the Bagger Silo was replaced by a new unit designated as Cyclone #3A. Cyclone #4 serving the Shavings Hopper was replaced by a new unit designated as Cyclone #4A.

Cyclone #5 serves the Planer Mill Chip Hopper. The Planer Mill Project added the VA Mill Shavings exhaust to this unit. This causes this cyclone to occasionally have an increased load. IFP has calculated that the increased loading is still within the unit's design capacity.

Following is an updated list of facility cyclones:

Equipment	Throughput*
Cyclone #1A (Specialty Mill)	6,000 tpy
Cyclone #2A & 2B (Planer Mill Shavings)	25,000 tpy
Cyclone #3A (Shavings Silo)	25,000 tpy
Cyclone #4A (Shavings Truck Bin)	25,000 tpy
Cyclone #5 (Planer Mill Hog and VA Mill Truck Bin)	13,000 tpy
Cyclone #6 (Boiler #1&#2 Fuel Silos)	1,000 tpy
Cyclone #6A	Out of Service Prior to 1999
Cyclone #7 (Boilers #1&#2 Fuel Input)	14,000 tpy

\*The listed throughputs represent typical process throughput rates, not the maximum load rating of the cyclones.

## II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

### 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 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 emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

### B. Cyclones #1A, #2A & 2B, #3A, #4A, and #5

The Planer Mill Project resulted in changes in the operation of Cyclone #5 and installation of new Cyclones #1A, #2A & 2B, #3A, and #4A.

The facility's cyclones are both process equipment (because they move material throughout the facility) and control equipment (because they remove particulate matter from the exhaust stream).

BACT for emissions of particulate matter from the Planer Mill Project was determined to be good operation and maintenance practices for the cyclones demonstrated by records of monthly inspections and of all maintenance activities performed. IFP shall monitor and record the pressure drop across each cyclone at least once per month.

Visible emissions from any general process source, including any facility cyclone, shall not exceed an opacity of 20% on a six-minute block average basis.  
[06-096 C.M.R. ch. 101, § 3(B)(4)]

### C. Facility 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 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-409-70-G-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-409-70-F-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 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 Condition (20) of Air Emission License A-409-70-F-R/A:**

#### (20) **Facility Cyclones and General Process Emissions**

A. IFP shall conduct and maintain records of the following:

1. Monthly inspections of each cyclone.
2. Pressure drop across each cyclone recorded at least once per month.
3. Maintenance activities (scheduled or unscheduled) performed on each cyclone.  
[06-096 C.M.R. ch. 115, BACT (A-409-77-4-A, 2/24/2020)]

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- B. Visible emissions from any general process source, including any facility cyclone, shall not exceed an opacity of 20% on a six-minute block average basis.  
[06-096 C.M.R. ch. 101, § 3(B)(4)]

DONE AND DATED IN AUGUSTA, MAINE THIS 7<sup>th</sup> DAY OF JUNE, 2021.

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-409-70-F-R/A.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 2/18/2021

Date of application acceptance: 2/19/2021

Date filed with the Board of Environmental Protection:

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

**FILED**  
JUN 07, 2021  
State of Maine  
Board of Environmental Protection