



DEPARTMENT ORDER

**Pioneer Plastics Corporation
Androscoggin County
Auburn, Maine
A-448-77-10-M**

**Departmental
Findings of Fact and Order
New Source Review
NSR #10**

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 (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Pioneer Plastics Corporation (Pioneer)
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Revision
NAICS CODES	325211, 322222, 326130
NATURE OF BUSINESS	Manufacturer of decorative laminate, melamine coated paper, and specialty resins
FACILITY LOCATION	One Pionite Rd, Auburn, Maine

B. NSR License Description

In New Source Review (NSR) air emission license A-448-77-9-A (issued 7/21/17) Pioneer Plastics Corporation (Pioneer) licensed the installation and operation of a new high-pressure laminate double-belt press to produce continuous pressed laminate (CPL). This new press is known as CPL Line #1 and is currently under construction. Pioneer has requested a minor revision to A-448-77-9-A in order to modify the configuration of the particulate matter (PM) control equipment.

C. Emission Equipment

The following equipment is addressed in this NSR license amendment:

Process Equipment

Equipment	Unit Capacity	Pollution Control Equipment
CPL Line #1	237.8 ft ² /min	Fabric Filter for in-line sanding equipment

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 proposed revision will not result in any potential or actual increase in emissions of any regulated air pollutant. Therefore, this NSR license amendment is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 Code of Maine Rules (C.M.R.) ch. 115. The procedures found in 06-096 C.M.R. ch. 115 can be utilized to process this application since the proposed revision is not prohibited by the Part 70 air emission license. An application to incorporate the requirements of this NSR license amendment into the Part 70 air emission license shall be submitted no later than 12 months from commencement of the requested operation.

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. Revision Description

CPL Line #1 includes in-line sanding, trimming, and cutting equipment which formats the final product for length and width. The dust from the in-line sander will be captured with an integrated cartridge dust collector (CPL Line #1 Collector) that will vent outside the building. The CPL Line #1 Collector is expected to achieve at least 99% control of PM/PM₁₀ emissions using paper or fabric filters to remove dust from the air stream.

Originally, Pioneer proposed pneumatically conveying the dust captured by the CPL Line #1 Collector through the existing Dust Transport System to a truck loading area where it would be collected using an existing baghouse. A further engineering analysis has determined that the volume of air required would overwhelm the existing Dust Transport System. Therefore, Pioneer has proposed installing a separate dust collection system for CPL Line #1.

Instead of conveying the collected dust to the existing Dust Transport System, Pioneer has proposed pneumatically conveying the dust collected by the CPL Line #1 Collector to a new dust collection unit. The new unit would be a Camfil Farr Dust Collector. The Camfil Farr Dust Collector is a cartridge filter system that uses pulses of air to clean the filter media, similar to a baghouse. The PM control efficiency of the Camfil Farr Dust Collector is rated at 99.9%+ and will meet or exceed the collection levels of the baghouse associated with the existing Dust Transport System.

The Camfil Farr Dust Collector will be located outside the building and will discharge into the existing dust collection bin along with the dust collected from the facility's existing Dust Transport System.

The installation and use of the Camfil Farr Dust Collector is determined to be functionally equivalent to the use of the existing Dust Transport System and baghouse, and it will not result in any potential or actual increase in emissions of any regulated air pollutant.

Therefore, BACT for PM emissions from CPL Line #1's in-line sander is determined to be the use of the CPL Line #1 Collector and conveyance of the collected dust to the Camfil Farr Dust Collector. Both the CPL Line #1 Collector and the Camfil Farr Dust Collector shall achieve at least 99% control. Visible emissions from the CPL Line #1 Collector and the Camfil Farr Dust Collector shall each not exceed 10% opacity on a six-minute block average basis.

C. Incorporation Into the Part 70 Air Emission License

The requirements in this 06-096 C.M.R. ch. 115 New Source Review license amendment shall apply to the facility upon issuance. Per *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.

D. Annual Emissions

This amendment will not have any effect on licensed annual emissions.

ORDER

The Department hereby grants New Source Review Minor Revision A-448-77-10-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the standard and special conditions below.

SPECIFIC CONDITIONS

The following shall Replace Condition (1) of Air Emission License A-448-77-9-A:

- (1) CPL Line #1
 - A. Visible emissions from the press section of CPL Line #1 shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BACT]
 - B. Pioneer shall use CPL Line #1 Collector to control PM emissions from the in-line sanding operations on CPL Line #1. CPL Line #1 Collector shall meet a minimum control efficiency of 99%. Compliance shall be demonstrated by the recordkeeping requirements outlined below and emissions testing performed on request by the Department. [06-096 C.M.R. ch. 115, BACT]
 - C. Pioneer shall convey the dust from the CPL Line #1 Collector to the outside dust collection bin pneumatically. PM emissions from this dust collection system shall be controlled by the Camfil Farr Dust Collector. The Camfil Farr Dust Collector shall meet a minimum control efficiency of 99%. Compliance shall be demonstrated by the recordkeeping requirements outlined below and emissions testing performed on request by the Department. [06-096 C.M.R. ch. 115, BACT]
 - D. Pioneer shall inspect the CPL Line #1 Collector and Camfil Farr Dust Collector monthly for leaks and shall keep records of these inspections as well as any maintenance (planned or unplanned) performed including filter replacements. [06-096 C.M.R. ch. 115, BACT]
 - E. Visible emissions from the CPL Line #1 Collector and Camfil Farr Dust Collector shall each not exceed 10% opacity on a six minute block average basis. Upon request by the Department, Pioneer shall demonstrate compliance with observations performed by someone familiar with EPA Method 9. [06-096 C.M.R. ch. 115, BACT]

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The following are New Conditions:

- (7) Pioneer shall submit an application to incorporate this NSR license amendment into the facility's Part 70 air emission license no later than 12 months from commencement of the requested operation. [06-096 C.M.R. ch. 140 § 1(C)(8)]

DONE AND DATED IN AUGUSTA, MAINE THIS 16 DAY OF March, 2018.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Paul Allen Robert Cove for*
PAUL MERCER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 3/7/18

Date of application acceptance: 3/9/18

Date filed with the Board of Environmental Protection:

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



