



DEPARTMENT ORDER

**Maine Woods Pellet Company, LLC,
Athens Capital Holdings, LLC &
Athens Energy LLC
Somerset County
Athens, Maine
A-989-70-D-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #3**

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	Maine Woods Pellet Company, LLC, Athens Capital Holdings, LLC & Athens Energy LLC
LICENSE TYPE	Part 70 Administrative Revision
NAICS CODES	321219
NATURE OF BUSINESS	Wood Pellet Manufacturer
FACILITY LOCATION	164 Harmony Road, Athens, Maine

Maine Woods Pellet Company, LLC (MWP), along with co-applicants Athens Capital Holdings, LLC and Athens Energy LLC, is a wood pellet manufacturing facility consisting of wood dryers, pelletizers, and material handling equipment. The facility also includes a cogeneration plant which consists of a wood-fired furnace and a wood pre-dryer.

New Source Review (NSR) license amendment A-989-77-7-M (issued 1/21/2021) addressed revisions to the description of the particulate matter control equipment associated with Pre-Dryer #1. MWP has requested that the provisions of this NSR license amendment be incorporated into their Part 70 license.

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

Furnace

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (ton/hr)	Fuel Type, % sulfur	Date of Manuf.	Stack #
Furnace #1	149	16.6	biomass, negligible	2015	3

Wood Drying Equipment

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Maximum Production Rate (ODT/hr)	Fuel Type	Install. Date	Stack #
Pre-Dryer #1	N/A	6.5	N/A	2015	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.

The requested revision to correct the description of the particulate matter control equipment associated with Pre-Dryer #1 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 since it involves the clarification of existing conditions. This Part 70 Administrative Revision incorporates into MWP's Part 70 Air License the relevant terms and conditions of NSR license amendment A-989-77-7-M (issued 1/21/2021) which also addressed this clarification.

D. Revision Description

MWP operates a cogeneration facility consisting of a 149 MMBtu/hr biomass-fired furnace (Furnace #1) and a direct-contact rotary drum dryer (Pre-Dryer #1).

Exhaust gases from Furnace #1 pass through a dry electrostatic precipitator (ESP) to remove particulate matter prior to entering a directly connected rotary drum dryer (Pre-Dryer #1). Waste heat in the combustion exhaust gas from Furnace #1 may be utilized by Pre-Dryer #1 to dry wood for use in the pelletizing process. The moisture-laden exhaust from Pre-Dryer #1 then passes through multicyclones to remove particulate matter that may become entrained in the exhaust gases during the drying process. Furnace #1 may also operate without drying wood in Pre-Dryer #1. In such cases, the emissions from Furnace #1 are controlled only by the ESP and may bypass the multicyclones.

Between Pre-Dryer #1 and the multicyclones, there is a process unit that previously has been mislabeled as a cyclone. In reality, it is simply an expansion in the ductwork which slows the velocity of the air and allows the dried wood to drop out of the air stream (i.e., a dropbox). This unit does not operate as a cyclone as there is no cyclonic action used to separate the wood from the air stream. MWP requested that references to this “cyclone” in MWP’s licenses be corrected to “dropbox” to more accurately describe the equipment on-site. The Department agreed with this request. This change does not affect the Best Available Control Technology (BACT) analysis performed for this equipment as there will be no change in licensed emission limits, and MWP previously demonstrated compliance with the particulate matter emission limits using the control equipment in the configuration described above through compliance testing performed the week of May 22, 2017.

E. Facility Annual Emissions

This license amendment will not change the facility’s licensed annual emissions.

III. AMBIENT AIR QUALITY ANALYSIS

MWP previously submitted an ambient air quality analysis demonstrating that emissions from the facility (A-989-71-E-A), in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Part 70 License.

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-989-70-D-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-989-70-A-I, in amendments A-989-70-B-A and A-989-70-C-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.

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SPECIFIC CONDITIONS

The following shall replace Condition (14)(D)(2) of Air Emission License A-989-70-C-A.

(14) Furnace #1 and Pre-Dryer #1

D. Control Equipment

2. Emissions of PM/PM₁₀/PM_{2.5} from Pre-Dryer #1 shall be controlled by the operation and maintenance of a dropbox and multicyclone.
[06-096 C.M.R. ch. 115, BACT (A-989-77-7-M, 1/21/2021)]

DONE AND DATED IN AUGUSTA, MAINE THIS 21st DAY OF JANUARY, 2021.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, ACTING COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-989-70-A-1.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/16/2020

Date of application acceptance: 10/16/2020

Date filed with the Board of Environmental Protection:

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

