



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

HUBER ENGINEERED WOODS, LLC.)
AROOSTOOK COUNTY)
EASTON, MAINE)
A-62-77-4-M) 1

DEPARTMENTAL
FINDINGS OF FACT AND ORDER
NEW SOURCE REVIEW LICENSE
MINOR REVISION

After review of the air emission license minor revision application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344, Section 590, 06-096 CMR 115 and the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Huber Engineered Woods, LLC. (Huber)
PART 70 LICENSE NUMBER	A-62-70-C-R
LICENSE TYPE	Chapter 115 Minor Revision
NAIC CODES	321219
NATURE OF BUSINESS	Oriented Strand Board Manufacturer
FACILITY LOCATION	Easton, Maine
DATE OF NSR LICENSE ISSUANCE	April 5, 2010

B. Revision Description and Affected Emission Equipment

Huber has requested a 06-096 CMR 115 Minor Revision to New Source Review Air License, A-62-77-3-A, to correct requirements relating to Huber's new diesel-fired emergency generator and its existing edge coating process.

C. Application Classification

Huber is a major source per the Maine Department of Environmental Protection's 06-096 CMR 100 regulation. The changes made to the edge coating process and the emission factors for the diesel generator will increase emissions by less than 4 tons/year for each single pollutant and less than 8 tons/year for all pollutants combined. Therefore, this modification is determined to be a minor revision in accordance with 06-096 CMR 115 and has been processed as such.

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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 06-096 CMR 100 of the Department's regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

On June 13, 2007, the Department issued New Source Review Air License, A-62-77-2-A, to Huber for the construction and initial operation of Huber's Maximum Achievable Control Technology (MACT) Compliance Project at the Easton plant. Huber completed construction and began operation of Phase I of the MACT Compliance Project in Fall of 2008. As part of Phase I of the project, Huber installed a 2.6 MMBtu/hr emergency diesel generator. The 2007 Cummins Inc. generator installed by Huber is rated at 250 kW/hr and 399 horsepower (hp).

B. Correction to Diesel-Fired Emergency Generator Emission Limits

The emission limits set forth in Huber's air license for the generator are based on EPA's Tier III emission limits set forth in 40 CFR Part 60, Subpart III. EPA's Tier III standards in Subpart III, Table 1 include emission limits for PM, NO_x, CO, and VOC applicable to the Cummins engine. The Subpart III presents applicable emissions limits in terms of both grams/kW-hr and grams/HP-hr. The applicable emission limits in Huber's existing air license were based on the kilowatt rating of the emergency generator (i.e. 250 kW/hr) and the applicable grams/kW-hr emission limits in Subpart III. However, Cummins has provided Huber with an "EPA Tier III Exhaust Emission Compliance Statement" which documents compliance with applicable grams/HP-hr limits. There are minor differences between the applicable lbs/hr emission limits that are calculated based upon the kW rating of the generator (250 kW/hr) and the applicable limits versus the horsepower rating of the generator (399 HP) and the applicable limits. Huber was not aware that the engine supplier would base its Compliance Statement on the applicable grams/HP-hr limits instead of the applicable grams/kW-hr limits.

In order to assure that the documentation from the equipment supplier (Cummins) aligns with the applicable emission limits in the air license, the Department will revise the emission limits to be based on the grams/HP-hr.

C. Correction to VOC Content Limit for Edge Coatings

Prior to issuance of the New Source Review Air License, A-62-77-2-A, for the MACT compliance project, Huber's air license limited the VOC content of edge coatings to 2%.

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After the new source review license was issued on March 28, 2007, the edge coating VOC limit was changed to 1% as described below in Condition (23):

(23) Edge Spraying

Huber shall use only edge coatings containing one percent or less VOCs. Huber shall maintain documentation from the suppliers to demonstrate VOC content of edge coatings and maintain documentation with amount of VOC emitted. [MEDEP Chapter 115, BACT]

At the time, Huber believed that the VOC content of the edge coatings utilized at the Easton facility contained less than 1% VOC. This conclusion was based on the information in the applicable Material Safety Data Sheets (MSDS). Since that time, Huber has conducted Method 24 testing on the edge coatings which the results indicate that at least two of the coatings may contain between 1% -2% VOCs. However, the laboratory conducting the testing stated that the results of Method 24 on waterborne products (e.g. the edge coatings utilized at Easton) are not very reliable. Method 24 testing was designed for solvent-borne particles not waterborne products which are typically very low VOC and high solids. Although the Method 24 test on the edge coatings did not meet all of the required quality assurance requirements for acceptable Method 24 results, the test results raise a question regarding the actual VOC content of the edge coatings used at Huber.

In the Finding of Fact section of the New Source Review license, the annual licensed allowed ton per year (tpy) emissions for fee purposes from the edge coatings is 6.46 tpy. The 6.46 tons per year was not established as a limit in the condition for the edge coating process, however, the VOC content was limited to 1%. To allow the facility flexibility with edge coatings' VOC contents and to clear up the question of VOC content based on Method 24 and MSDS, the Department has determined that BPT for this process will be to limit VOC emissions to 6.46 tons per year, based on a 12 month rolling total and remove the % VOC content limit. Also, BPT will require Huber to limit VOC emissions from the edge spraying process to 1,666 pounds or less in any calendar month, which is the license limit for exemption from 06-096 CMR 129 "Surface Coating" regulation.

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 this Minor Revision, Air Emission License A-62-77-4-M, pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the standard and special conditions below.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this license 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

The following shall replace Condition (27) of the New Source Review Air License, A-62-77-2-A, and Specific Condition (1) of Air Emissions License, A-62-77-3-A:

(27) Back-up Diesel Generator #1

- A. Generator #1 shall fire only diesel fuel with a maximum sulfur content not to exceed 500 ppm. [40 CFR 60.4207(a)]
- B. Beginning October 1, 2010, Generator #1 shall fire only diesel fuel with a maximum sulfur content not to exceed 15 ppm. [40 CFR 60.4207(b)]
- C. Generator #1 shall be limited to 100 hr/yr of operation for maintenance checks and readiness testing. Generator #1 shall be limited to 500 hours per year of total operation. Both of these limits are based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours. [40 CFR 60.4211(E) and 06-096 CMR 115, BACT]
- D. Generator #1 shall be equipped with a non-resettable hour meter. [40 CFR 60.4209(a)]
- E. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Generator #1	PM	0.10	06-096 CMR 115, BACT

- F. Emissions shall not exceed the following [40 CFR 60.4205(b)]:

Emission Unit	PM (g/hp-hr)	NO _x + VOC (g/hp-hr)	CO (g/hp-hr)
Generator #1	0.15	3.0	2.6

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G. Emissions shall not exceed the following [06-096 CMR 115, BACT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x + VOC (lb/hr)	CO (lb/hr)
Generator #1	0.13	0.13	0.13	2.64	2.29

H. Huber shall operate and maintain Generator #1 in accordance with the manufacturer's written instructions. Huber shall not change settings that are not approved in writing by the manufacturer. [40 CFR 60.4211(a)]

I. Visible emissions from the back-up generator shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block averages in a continuous 3-hour period. [06-096 CMR 101]

The following shall replace Condition (23) of the New Source Review Air License, A-62-77-2-A:

(23) Edge Spraying

Huber shall limit VOC emissions from the edge spraying process to 6.46 tons per year, based on a 12 month rolling total and shall limit VOC emissions to 1,666 pounds or less in any calendar month. Huber shall maintain documentation from the suppliers to demonstrate compliance with the VOC emission limit. [06-096 CMR 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS *5th* DAY OF *April* 2010.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *James P. Brooks*

DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: April 3, 2009

Date of application acceptance: April 3, 2009

Date filed with the Board of Environmental Protection _____

This Order prepared by Edwin Cousins, Bureau of Air Quality

