



DEPARTMENT ORDER

**Vic Firth Company
Penobscot County
Newport, Maine
A-334-71-F-M (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

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 (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Vic Firth Company (Vic Firth) was issued Air Emission License A-334-71-E-T/R on March 21, 2013, for the operation of emission sources associated with their wood products manufacturing facility.

Vic Firth has requested a minor revision to their license in order to address the phased relocation of their plant.

B. Revision Description

Vic Firth is currently licensed to operate emissions equipment at their facility located at 77 High Street in Newport, Maine. Vic Firth plans to move to a new facility, located approximately 0.7 miles away at 34 Progress Park in Newport, over a 3-5-year period.

Current activities at the Progress Park location include mostly warehousing and preparing the facility to accommodate some process equipment. Heat to the facility is currently provided by propane-fired space heaters each less than 1.0 MMBtu/hr which are considered insignificant activities.

Vic Firth anticipates moving the Tone Pairing and Shipping Departments to Progress Park in 2018 and the Finishing Department in 2019. The remaining departments, including Checking & Tipping, Saw Mill, Molder Cell, Grinding, Drying Kilns, and the Boiler House are expected to move sometime in the 2020-2022 timeframe.

The relocation of equipment is not considered a modification provided there are no physical changes, or changes in the method of operation, that result in a potential increase in emissions. Provided no such changes are made, the moving of these operations to the Progress Park site does not require a Best Available Control Technology (BACT) analysis.

Until the move to Progress Park is complete, both the High Street and Progress Park locations are considered part of Vic Firth's "facility." Any facility-wide emission limits apply to both sites combined. For example, the ton/year limit on facility emissions of volatile organic compounds (VOC) shall be a combination of the emissions from both sites. Also, visible emission limits for fugitive emissions and general process sources apply to both locations.

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.

This amendment will not increase emissions of any pollutant. Therefore, this amendment is determined to be a minor revision under *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115 and has been processed as such.

D. Annual Emissions

This amendment will not have any effect on 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, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License Amendment A-334-71-F-M subject to the conditions found in Air Emission License A-334-71-E-T/R and the following conditions.

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

This license does not change or add any Specific Conditions.

DONE AND DATED IN AUGUSTA, MAINE THIS 22 DAY OF February, 2018.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Corne for
PAUL MERCER, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-334-71-E-T/R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 1/29/18

Date of application acceptance: 1/29/18

Date filed with the Board of Environmental Protection:

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

