



DEPARTMENT ORDER

**Pleasant River Lumber Company
Piscataquis County
Dover-Foxcroft, Maine
A-704-71-J-A**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #2**

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

Pleasant River Lumber Company (Pleasant River) was issued Air Emission License A-704-71-H-R/A on March 31, 2014, for the operation of emission sources associated with their Dover-Foxcroft, Maine lumber mill. The license was subsequently amended on October 27, 2017 (A-704-71-I-A).

Pleasant River has requested an amendment to their license in order to add a new continuous feed kiln.

The equipment addressed in this license amendment is located at 42 Milo Road, Dover-Foxcroft, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license amendment:

Process Equipment

Equipment	Production Rate	Pollution Control Equipment	Stack #
Kiln #4	100 MMBF/yr	None	Fugitive

C. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the date this license was issued.

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the “Significant Emission” levels as defined in the Department’s *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100. The emission increases are determined by subtracting the current licensed annual emissions preceding the modification from the maximum future licensed annual emissions, as follows:

Pollutant	Current License (TPY)	Future License (TPY)	Net Change (TPY)	Significant Emission Levels
PM	27.2	27.2	0	100
PM ₁₀	24.7	24.7	0	100
SO ₂	3.5	3.5	0	100
NO _x	35.9	35.9	0	100
CO	63.9	63.9	0	100
VOC	49.4	49.4	0	50

This modification is determined to be a minor modification and has been processed as such.

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.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 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. Kilns

Pleasant River is licensed to operate three kilns for drying of lumber produced at the facility, and has proposed the installation of a fourth kiln, Kiln #4. Kiln #4 is a continuous feed drying kiln designed to process approximately 100 MMBF/yr at maximum capacity. It is expected to eventually replace some or all of the capacity of the existing kilns.

Pleasant River is licensed to dry no more than 130 MMBF/yr of spruce and/or fir lumber in the kilns. They have not proposed an increase in throughput.

The only criteria pollutant emitted from the kilns is VOC which is driven out of the wood during the drying process. Add-on controls for emissions of VOC from the kilns, including

thermal oxidization, regenerative catalytic oxidation, adsorption, and condensation were evaluated for use with Kiln #4. The proposed Kiln #4 configuration has multiple exhaust points at varying temperatures and high moisture contents which make add-on VOC control devices not technically, economically, or environmentally feasible.

A site-specific Drying Kiln VOC emission study at the Pleasant River facility concluded with a VOC emission factor of 0.73 pounds per thousand board-feet (lb/MBF) from kiln-drying spruce and/or fir. Pleasant River shall maintain records for the Kilns which include the quantity of wood dried, species dried, drying dates, and calculated VOC emissions. The record of calculated VOC emissions for the Kilns shall be maintained on a monthly and 12-month rolling total basis.

C. Annual Emissions

Total annual emissions for the facility will not change as a result of this license amendment.

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by case basis. In accordance with 06-096 C.M.R. ch. 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM ₁₀	25
SO ₂	50
NO _x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license amendment.

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-704-71-J-A subject to the conditions found in Air Emission License A-704-71-H-R/A, in amendment A-704-71-I-A, 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.

The following shall replace Condition (19) of Air Emission License A-704-71-H-R/A:

(19) Kilns

- A. Pleasant River shall not exceed a yearly throughput of 130 million board feet per year of spruce and/or fir in the Drying Kilns based on a 12-month rolling total.
[06-096 C.M.R. ch. 115, BACT/BPT]
- B. Total VOC emissions from the Drying Kilns shall not exceed 47.5 ton/yr.
[06-096 C.M.R. ch. 115, BACT/BPT]
- C. Pleasant River shall maintain records for the Drying Kilns which include the quantity of wood dried, species dried, drying dates, and calculated VOC emissions, determined monthly using an emission factor of 0.73 lb/MBF for spruce and/or fir. Records shall be maintained on both a monthly and 12-month rolling total basis.
[06-096 C.M.R. ch. 115, BACT/BPT]

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D. Prior to drying any species of wood other than spruce or fir in the kilns, Pleasant River shall contact the Department to assess what emission factor(s) may need to be used to account for VOC emissions. [06-096 C.M.R. ch. 115, BACT/BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 6th DAY OF March, 2020.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:


GERALD D. REID, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-704-71-H-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 20, 2019

Date of application acceptance: August 20, 2019

Date filed with the Board of Environmental Protection:

This Order prepared by Benjamin Goundie, Bureau of Air Quality.

