



DEPARTMENT ORDER

**Lohmann Animal
Health International, Inc.
Kennebec County
Winslow, Maine
A-859-71-M-M**

**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

Lohmann Animal Health International, Inc. (LAHI) was issued Air Emission License A-859-71-K-R on July 26, 2023, for the operation of emission sources associated with their poultry vaccine development and manufacturing facility.

The equipment addressed in this license amendment is located at 375 China Road, Winslow, Maine.

LAHI has requested a minor revision to their license in order to reclassify Incinerator #3 as a class IV-B incinerator and permit the burning of both Type 4 and Type 7 waste in Incinerator #3.

B. Emission Equipment

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

Incinerator #3

Class Incinerator	IV-B
No. of Chambers	2
Type of Waste	Type 4 and Type 7
Max. Design (Combustion/Feed) Rate	1,200 pounds/load 45 lb/hr burn rate
Auxiliary Fuel Input:	LPG/propane
Primary Chamber (MMBtu/hr)	0.32
Secondary Chamber (MMBtu/hr)	1.2
Emission Control	Afterburner

C. Definitions

Records or *Logs* mean either hardcopy or electronic records.

D. 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.

This amendment will not increase licensed emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

E. Facility Classification

With the operating hours restriction on the emergency generators, the facility is licensed as follows:

- As a synthetic minor source of air emissions for NO_x, because LAHI is subject to license restrictions that keep facility emissions below major source thresholds for criteria pollutants; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

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 existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Incinerator #3

LAHI operates Incinerator #3 to dispose of poultry remains resulting from the processes conducted at this facility. Incinerator #3 is a Shenandoah (now Firelake Manufacturing) model P25-2GM1. Per the manufacturer's operating instructions, the incinerator is capable of burning Type 7 waste along with Type 4 waste. Therefore, Incinerator #3 shall be reclassified as a Class IV-B veterinary incinerator per 06-096 Code of Maine Regulations (C.M.R.) ch. 100 *Definitions* § 68 (G).

The definition of Type 7 – Infectious Waste includes animal carcasses and body parts, bedding, and other wastes from animals such as may be generated for disposal at LAHI. Inclusion of Type 7 waste may cause the incinerator to be subject to New Source Performance Standards (NSPS) *Emission Guidelines and Compliance Times for Hospital/Medical/Infectious Waste Incinerators*, 40 C.F.R. Part 60, Subpart Ce. With the following Type 7 waste firing restrictions, Incinerator #3 meets the definition of a co-fired combustor in Subpart Ce and therefore not subject to Subpart Ce pursuant to 40 C.F.R. § 60.32e(c):

- Incinerator #3 is restricted to the firing of not more than 10% by weight of infectious waste, as defined by *Biomedical Waste Management Rules*, 06-096 C.M.R. 900, Sections 7.A and 7.B, based on the total weight of wastes and fuel combusted.
- Type 7 waste shall be limited to 10% by weight per charge, and up 1,200 pounds per day in accordance with the Manufacturer's Instructions.

BPT for the Class IV-B veterinary incinerator shall include the BPT for Incinerator #3 in Air Emission License A-859-71-K-R § II (F), except § II (F) (1) through (6) shall be amended as follows:

1. Operating temperature in the secondary chamber or refractory lined stack shall be maintained at or above 1,700 °F with a stack gas retention time of at least 1.0 second at or above 1,700 °F.
2. To ensure an efficient burn, to prevent odors, and to minimize visible emissions, the secondary chamber shall be preheated, as specified by the manufacturer, until the pyrometer temperature measures a minimum of 1,700 °F prior to commencing the burn cycle.
3. Once the burn cycle has commenced by introduction of primary chamber combustion, the incinerator shall be operated in an efficient manner and as specified by the manufacturer for the period of time between preheat and reaching the set operational temperature to be a minimum of 1,700 °F in the secondary chamber.
4. The temperature in the secondary chamber or refractory lined stack shall be maintained at or above 1,700 °F for the duration of the burn cycle.

5. A pyrometer and ¼-inch test port shall be installed and maintained at the location of the incinerator or refractory lined stack, which provides sufficient volume to insure a flue gas retention time of not less than 1.0 second at the minimum of 1,700 °F.
6. LAHI shall maintain a log detailing and quantifying the hours of operation on a daily basis for Incinerator #3. The log shall record the weight of each charge to the incinerator broken out by waste material type, preheat temperature, preheating time, charging time, and afterburner temperature directly after charging and every 60 minutes after startup until, and including, final shutdown time.

To document compliance with the Type 7 waste limit of 10% of the total weight per charge, LAHI shall calculate and record in the log the percent by weight of Type 7 waste burned in each charge of the unit.

To document compliance with the Type 7 waste combustion limit of 1,200 lb/day, LAHI shall keep a daily total by weight of Type 7 waste burned in Incinerator #3.

For facilities operating a chart recorder, the start time, date, and weight charged may be logged on the chart. The operation log shall be kept on-site at the incinerator location.

C. Annual Emissions

This license amendment will not change the facility's licensed annual emissions and thus will also not trigger ambient air quality impact modeling.

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-859-71-M-M subject to the conditions found in Air Emission License A-859-71-K-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.

SPECIFIC CONDITIONS

The following shall replace Condition (21)(A), 21(C), and 21(E) through (G) of Air Emission License A-859-71-K-R:

(21) **Incinerator #3**

- A. The incinerator shall be used for the disposal of type 4 (veterinary) waste and no more than 10% by weight of Type 7 (infectious) waste per charge. Type 7 waste shall be limited to 1,200 pounds per day. The incinerator shall not be used for the disposal of plastics, cytotoxic (antineoplastic) drugs, or any radioactive wastes. However, the incidental use of plastics or other materials used in wrapping animal carcasses for handling and storage purposes is allowed. [06-096 C.M.R. ch. 115, BPT]
- C. LAHI shall maintain a log detailing and quantifying the hours of operation on a daily basis for Incinerator #3. The log shall record the weight of each charge to the incinerator broken out by waste material type, preheat temperature, preheating time, charging time, afterburner temperature directly after charging and every 60 minutes after startup until, and including, final shutdown time.

To document compliance with the Type 7 waste limit of 10% of the total weight per charge, LAHI shall calculate and record in the log the percent by weight of Type 7 waste burned in each charge of the unit.

To document compliance with the Type 7 waste combustion limit of 1,200 lb/day, LAHI shall keep a daily total by weight of Type 7 waste burned in Incinerator #3.

For facilities operating a chart recorder, the start time, date, and weight charged may be logged on the chart. The operation log shall be kept on-site at the incinerator location.

[06-096 C.M.R. ch. 115, BPT]

- E. The secondary chamber shall be preheated as specified by the manufacturer to a minimum of 1,700 °F prior to combusting any waste and shall be maintained at a minimum of 1,700 °F during the duration of the burn. [06-096 C.M.R. ch. 115, BPT]
- F. Once the burn cycle has commenced by introduction of primary chamber combustion, the incinerator shall be operated in an efficient manner and as specified by the manufacturer for the period of time between preheat and reaching the set operational temperature to be a minimum of 1,700 °F in the secondary chamber. [06-096 C.M.R. ch. 115, BPT]

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G. A pyrometer and ¼-inch test port shall be operated and maintained at that location of the incinerator or refractory lined stack which provides sufficient volume to insure a flue gas retention time of not less than 1.0 second at the minimum temperature of 1,700 °F. [06-096 C.M.R. ch. 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 6th DAY OF OCTOBER, 2023.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____ for
MELANIE LOYZIM, COMMISSIONER

The term of this license amendment shall be ten (10) years from the issuance of Air Emission License A-859-71-K-R (issued 07/26/2023).

[Note: If a renewal application, determined as complete by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 M.R.S. § 10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 15, 2023

Date of application acceptance: August 16, 2023

Date filed with the Board of Environmental Protection:

This Order prepared by Kendra Nash, Bureau of Air Quality.

FILED
OCT 06, 2023
State of Maine
Board of Environmental Protection