



DEPARTMENT ORDER

Huber Engineered Woods LLC
Aroostook County
Easton, Maine
A-62-77-5-M

Departmental
Findings of Fact and Order
New Source Review
NSR #5

FINDINGS OF FACT

After review of the air emission NSR license minor revision 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.), Section 344 and Section 590, the Maine Department of Environmental Protection (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Huber Engineered Woods LLC
LICENSE TYPE	06-096 C.M.R. 115, Minor Revision
NAICS CODES	321219
NATURE OF BUSINESS	Oriented Strand Board Manufacturer (OSB)
FACILITY LOCATION	333 Station Road, Easton, Maine

B. NSR License Description

Huber Engineered Woods LLC (Huber) has requested a New Source Review (NSR) license to replace an existing MacDonald baghouse with a new Rodrigue baghouse. This baghouse is used to remove particular matter from the exhaust collected from the blenders and formers. The installation is expected during the 4th quarter of 2016.

C. Application Classification

The application submitted by Huber does not violate any applicable federal or state requirements, does not reduce monitoring, reporting, testing, or recordkeeping requirements, and does not seek to modify a Best Available Control Technology (BACT) analysis.

The proposed revision will not change the facility's emission limits and will not result in an emissions increase of greater than 4 tons/year of a single pollutant or 8 tons/year total pollutants, both excluding greenhouse gases. Therefore, the NSR

license is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 Code of Maine Rules (C.M.R.) 115 (as amended). The procedures found in 06-096 C.M.R. 115 (as amended) can be utilized to process this application since the proposed revision is not prohibited by the Part 70 air emission license.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license to replace existing air pollution control equipment, the applicant must demonstrate to the Department that the new equipment will achieve Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 C.M.R. 100 (as amended).

B. Forming Fines Baghouse Replacement

1. Project Description

Huber currently operates the Forming Fines Baghouse which controls PM emissions from the blender and forming lines. The existing baghouse was installed in 1982 and although it is still operational, it is approaching the end of its useful life. Huber proposes to replace the existing 8 foot long filter MacDonald baghouse with a 12 foot long filter Rodrigue Metal Limited baghouse.

The new baghouse will utilize the existing fan and ductwork and will fit into all existing support steel maintaining the same air volume and discharge location as the existing baghouse. The new baghouse utilizes the same bag vendor/filter material as currently used in the existing baghouse to comply with the 1 tpy per baghouse PM limit. The differences with the replacement baghouse and the existing baghouse are the length of the filter bags and the Rodrigue filter baghouse is designed with an interior cyclone.

2. Regulatory Requirements

In order to minimize fugitive emissions, Huber will continue to follow a written, Best Management Practices (BMP) plan for all plant dust handling and control systems as described in Huber's license (A-62-70-F-R/A, 8/28/13).

The effective control technique for particulate matter from pneumatic transfer is baghouse control. Baghouse technology is considered BPT for this

application with annual particulate emissions less than 1 tpy from the baghouse.

3. Department Determination

The Department agrees that Baghouse technology and the BMP plan for dust handling and control systems is BPT for this application.

C. Incorporation into the Part 70 Air Emission License

The requirements in this 06-096 C.M.R. 115 New Source Review license shall apply to the facility upon issuance. Per *Part 70 Air Emission License Regulations*, 06-096 C.M.R. 140 (as amended), Section 1(C)(8), for a modification at the facility that has undergone NSR requirements or been processed through 06-096 C.M.R. 115, the source must then apply for an amendment to their Part 70 license within one year of commencing the proposed operations, as provided in 40 C.F.R. Part 70.5. However, since there are no new or changing requirements as part of this NSR, a Part 70 amendment is not needed.

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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 New Source Review Minor Revision A-62-77-5-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. 115 and approves the installation and operation of the replacement baghouse.

There are no new or modified conditions as a result of this minor revision.

DONE AND DATED IN AUGUSTA, MAINE THIS 28 DAY OF September, 2016.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Paul Allen Robert Case for
PAUL MERCER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: July 13, 2016

Date of application acceptance: July 22, 2016

Date filed with the Board of Environmental Protection:

This Order prepared by Lisa P. Higgins, Bureau of Air Quality.

