



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**FMC Corporation
Biopolymer Division
Knox County
Rockland, Maine
A-366-77-4-M**

**Departmental
Findings of Fact and Order
New Source Review License
NSR #1**

After review of the air emissions license amendment 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., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	FMC Corporation (FMC)
LICENSE TYPE	06-096 CMR 115, Minor Revision
NAICS CODES	311999, 325412
NATURE OF BUSINESS	Refined Hydrocolloid Products
FACILITY LOCATION	Crocketts Point, PO Box 308, Rockland

B. Amendment and Emission Equipment Description

FMC currently operates a blending system that blends together ground raw materials into custom formulations to create various grades of their hydrocolloid products. This blending system is located in Building 3/8 and is identified in Air Emission License A-366-70-F-R as the following process equipment:

Existing Process Equipment

<u>Equipment Unit ID</u>	<u>Stack #</u>	<u>Pollution Control Equipment</u>
#11, Tote Dumper System	3A-7	Baghouse
#12, Blending Product Conveyor System	3A-3	Baghouse
#13, Blending Area and Vacuum System	8A-1	Baghouses

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1235 CENTRAL DRIVE, SKYWAY PARK
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FMC proposes to, at least temporarily, discontinue use of this existing blending system and add a modern blending and packaging system to be located in FMC's on-site warehouse (Building 13). FMC wishes to retain the existing blending equipment on its Air Emission License for possible use in the future.

The process equipment associated with the new blending and packaging system is identified as follows:

New Process Equipment

Equipment Unit ID	Stack #	Pollution Control Equipment
New Blending and Packaging System	13-7	Three (3) Baghouses

FMC has requested an amendment to their license in order to install and operate this new modernized blending and packaging system.

C. Application Classification

This amendment will not cause an increase in emissions of any pollutant. Therefore, this modification is determined to be a minor revision and has been processed as such in accordance with *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended).

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 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

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 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. New Blending and Packaging System

FMC's New Blending and Packaging System consists of process equipment located in their on-site warehouse (Building 13), including a new tote dumper system, blending product conveyor system, and blending area and vacuum system. Particulate matter emissions generated by this equipment will be collected and controlled with three baghouses exhausting to one stack to minimize visible emissions.

The Department finds that BACT includes operation and maintenance of the three baghouses to control visible emissions from the New Blending and Packaging System to a level of no more than 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in any one (1) hour period.

C. Annual Emissions

The proposed changes will result in no changes to any of the annual emission limits currently contained in FMC's Air Emission Licenses, including any amendments.

III. AMBIENT AIR QUALITY ANALYSIS

A modeling analysis performed by Department staff in April of 2004 demonstrated that emissions from FMC, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this minor revision.

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 Air Emission License A-366-77-4-M subject to the following conditions.

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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

(1) **New Blending and Packaging System**

A. FMC shall operate and maintain the three baghouses associated with the New Blending and Packaging System to minimize visible emissions.
[06-096 CMR 115, BACT]

B. Visible emissions from the New Blending and Packaging System shall not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a one (1) hour period.
[06-096 CMR 115, BACT]

(2) FMC shall submit an application to incorporate this amendment into the Part 70 license no later than 12 months from commencement of the requested changes.
[06-096 CMR 140, Section 2(J)(2)(c) and 40 CFR Part 70.5(a)(1)(ii)]

DONE AND DATED IN AUGUSTA, MAINE THIS 30th DAY OF ~~March~~, 2012.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie L. Lister
PATRICIA W. AHO, COMMISSIONER

Correction
of date Error.
-ZM

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 4, 2011

Date of application acceptance: August 12, 2011

Date filed with the Board of Environmental Protection:

This Order prepared by Eric Kennedy, Bureau of Air Quality.

