



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

Irving Forest Products, Inc.)
Oxford County)
Dixfield, Maine)
A-409-77-1-A)

Department
Findings of Fact and Order
Amendment #1

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 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Irving Forest Products, Inc. (Irving)
LICENSE NUMBER	A-409-77-1-A
LICENSE TYPE	New Source Review license amendment
NAICS CODES	321912, 321113, 321999
NATURE OF BUSINESS	Lumber, Manufacturer
FACILITY LOCATION	Ten Hall Hill Road, Dixfield

B. Emission Equipment

The following process emission units are addressed by this New Source Review (NSR) Air Emission License amendment:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Drying Kilns (1-11)	190,000BF per kiln per week	Process Equipment
Drying Kilns (12-13)	75,000 BF per kiln per week	Process Equipment

C. Application Classification

The application for Irving does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping. This application does seek to modify a Best Available Control Technology (BACT) analysis performed per New Source Review.

Irving has applied to amend the facility's Air Emission License in order to increase the facility's wood drying kiln throughput restriction.

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AUGUSTA, MAINE 04333-0017
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PRESQUE ISLE, MAINE 04769-2094
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The modification of a major source is considered a major modification based on whether or not expected emissions increases exceed the "Significant Emission Increase Levels" as given in *Definitions Regulation*, 06-096 CMR 100 (last amended December 1, 2005). As a result of increasing the wood drying kiln throughput, an increase in the facility's licensed annual VOC emission restriction will be expected. The emission increase is determined by subtracting the average actual emissions of the 24 months preceding the modification (or representative 24 months) from the maximum future license allowed emissions. The emissions increase as a result of the increased kiln throughput is as follows:

Pollutant	Average Past Actuals 05 – 06 (ton/year)	Future Permit (ton/year)	Net Change (ton/year)	Significance Level (ton/year)
VOC	82.2	120.7	38.5	40

This amendment is determined to be a minor modification under *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 1, 2005) and has been processed as such.

II. EMISSION UNIT DESCRIPTION

Drying Kilns

Irving utilizes 13 kilns to dry their lumber before sale. Kilns #1 through #11 are track kilns each with rated capacities of 190,000 BF per week. This gives Irving a total maximum kiln volume of 2,090,000 BF per week for kilns #1 through #11. These kilns are run on a 7-day charge cycle and are capable of 52 charges per year. Kilns #12 and #13 are older front loading kilns each with total maximum kiln volume of 75,000 BF (boardfeet) per week. Irving Forest Products, Inc. is capable of running 52 charges per year through kilns #12 and #13 each based on a twelve-month rolling total.

Irving predominantly dries eastern white pine. Irving's current air emission license (A-409-70-A-I) established a kiln through-put restriction of 80 MMBF per year (MMBF/yr). Irving is currently planning to increase kiln production at the Dixfield facility. As a result, Irving is proposing to increase the facility's lumber drying production from 80.0 MMBF/yr to 101.55 MMBF/yr. Using a factor of 2.26 pounds of VOC released in the kiln drying process for every 1,000 BF of white pine dried, Irving will increase the facility's licensed potential to emit VOC from kiln operations from 90.4 tons of VOC per year to 114.8 tons of VOC per year based on a twelve-month rolling total.

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Along with the Air Emission License amendment application, Irving submitted a BACT analysis to the Department comparing the BACT requirements of other similar facilities as documented in the US EPA BACT/RACT/LAER clearinghouse. The analysis documented that BACT for the control of VOC emissions from wood drying kiln operations does not require any add-on control equipment. BACT consists of good kiln operation and maintenance practices.

Irving shall continue to maintain kiln operation records indicating the quantity of wood dried in BF. The kiln records shall be kept on a monthly and a 12-month rolling basis.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 Air Emission License renewal A-409-77-1-A, subject to the conditions found in A-409-70-A-I following conditions:

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.

The following conditions are in addition to Irving's New Source Review permits issued under Maine's rule 06-096 CMR 115:

(1) Drying Kilns

- A. Irving shall be limited to drying a total of 101,550,000 boardfeet (101.55 MMBF) of lumber per year in the facility's drying kilns based on a twelve-month rolling total. [06-096 CMR 115, BACT]

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B. Irving Forest Products, Inc. shall maintain records indicating the quantity of wood dried in BF and VOC emissions from kiln operations. VOC emissions shall be calculated using an emission factor of 2.26 pounds of VOC per 1,000 BF. The kiln record shall be maintained on a monthly and a twelve-month rolling total basis. [06-096 CMR 115, BACT]

DONE AND DATED IN AUGUSTA, MAINE THIS 14th DAY OF March 2008.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brook
DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: February 6, 2008

Date of application acceptance: February 14, 2008

Date filed with the Board of Environmental Protection: _____

This Order prepared by, Peter G. Carleton, Bureau of Air Quality

