



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

PIONEER PLASTICS CORPORATION)	DEPARTMENTAL
ANDROSCOGGIN COUNTY)	FINDING OF FACT AND ORDER
AUBURN, MAINE)	AIR EMISSION LICENSE
A-448-77-3-M)	NEW SOURCE REVIEW #3

After review of the air emissions license 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

Pioneer Plastics Corporation operates a manufacturing plant in Auburn, Maine. Pioneer has requested a minor revision to modify their air emissions license, A-448-70-A-A/I, for the temporary installation of a pollution control VOC incinerator to replace their existing Thermal Oxidizer until that unit is repaired.

FACILITY	Pioneer Plastics Corporation (Pioneer)
LICENSE NUMBER	A-448-77-3-M
LICENSE TYPE	Chapter 115 Minor Revision
NAICS CODES	325211, 322222, 326130
NATURE OF BUSINESS	Manufacturer of decorative laminate, melamine coated paper, and specialty resins
FACILITY LOCATION	Auburn, Maine
DATE OF MINOR REVISION ISSUANCE	September 2, 2009

II. APPLICATION CLASSIFICATION

Pioneer's application was submitted pursuant to the minor revision procedures in 06-096 CMR 115. The application for Pioneer does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping. This amendment will not increase licensed allowable or actual emissions of any pollutant. Therefore, this modification is determined to be a minor revision (emission increase of less than 4 tons/year for each single pollutant and less

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than 8 tons/per year for all pollutants combined) under 06-096 CMR 115 and has been processed as such. This application seeks to add flexibility to the air license to temporarily install a portable VOC incinerator.

III. REVISION DESCRIPTION

Temporary VOC Incinerator

The facility's principal products consist of: (a) Pionite, a decorative laminate used for countertops and furniture; (b) amino resin coated paper used as a decorative surface for particleboard and other substrates; (c) polyester, phenolic or amino resin coated fiberglass mats; and (d) specialty resins produced both for resale and for on-site use. Pioneer operates a HAP/VOC incinerator referred to at the facility as the Thermal Oxidizer. The Thermal Oxidizer (39.5 MMBtu/hr) is used primarily to destroy volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) from the manufacturing process. The Thermal Oxidizer is also referred to as "Boiler #5" because it has a separate heat recovery component which produces steam for the facility.

As a pollution control device, the Thermal Oxidizer is subject to the following federal Maximum Achievable Control Technology (MACT) standards:

1. Amino/Phenolic Resin Production MACT (40 CFR Part 63 Subpart OOO)
2. The streamlined requirements of the Paper and Other Web Coating MACT (40 CFR Part 63 Subpart JJJJ) and the Printing, Coating and Dyeing of Fabrics and Other Textiles MACT (40 CFR Part 63 Subpart OOOO)
3. Organic Liquid Distribution (OLD) MACT (40 CFR Part 63 Subpart EEEE).
4. The thermal oxidizer is also subject to the control device requirements of the Miscellaneous Organic Chemical Production Processes NESHAP (MON) (40 CFR Part 63 Subpart FFFF).

As a result of a significant fire event that occurred August 24, 2009 in the duct work system of the Thermal Oxidizer/Boiler #5, it has rendered the unit temporarily inoperable. In the meantime, in order to resume production, Pioneer has requested a minor revision to install a temporary VOC incinerator. This unit would operate only in the interim from the issuance of this minor revision license until their existing Thermal Oxidizer is back on-line. The temporary unit has a maximum design

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capacity of 13.5 MMBtu/hr and will fire only natural gas. Because the unit is smaller in size and will combust only natural gas, the estimated actual emissions from the unit are less than the currently licensed Thermal Oxidizer unit.

The specific unit information is the following:

Manufacturer: NAO incorporated
Model: PTO
Size: 13.5 MMBtu/hr
Fuel: Natural Gas
Residence Time: 2 seconds
Operating temperature: 1500 °F – 2000 °F
Reported Destruction Efficiency: 99.5% at 1500 F

The unit will control emissions from the Impregnators P4 and P5, Coater C4, Urea Reactor K1, Melamine Reactor K2, Resin Blender K3, and Polyester Reactors K4, K5, K6, K7, and K8, as did the existing Thermal Oxidizer prior to the accidental fire.

Demonstration of Compliance

At all times, Pioneer will operate only in accordance with applicable permit conditions, including federal and Maine DEP regulations. Pioneer will test the unit to demonstrate compliance with the most stringent MACT standard for HAP/VOC destruction efficiency of 98%. Pioneer proposes to conduct a stack test as soon as possible to demonstrate compliance with the applicable MACT standards. A detailed stack test protocol will be prepared and submitted to DEP and EPA prior to the test date for review and comment.

As required by the existing Air Emissions License (A-448-70-A-A/I) and the MACT standards, Pioneer will continue to monitor individual equipment damper positions, condenser cooling water temperature, and Permanent Total Enclosure (PTE) differential pressure via the existing Citect System. To demonstrate continuous compliance during operations, the temperature of the portable VOC incinerator will be monitored continuously.

There have been no changes to the operation of the production equipment that is connected to this system; therefore there will be no change to the compliance practices the facility has followed prior to this incident. Pioneer will continue to record and report all parameters as required by the air license and the MACT regulations.

ORDER

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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, or increment standards either alone or in conjunction with emissions from other sources.

The Department hereby grants this minor revision, A-448-77-3-M, subject to the conditions found in Air Emission License A-448-70-A-A/I and subsequent amendments, in addition to the following conditions:

Pioneer is subject to the following New Source Review Chapter 115 conditions.

- (1) Pioneer may install a temporary natural gas fired 13.5 MMBtu/hr VOC incinerator in place of the damaged existing Thermal Oxidizer/Boiler #5 until January 1, 2010. Pioneer will continue to record and report all parameters as required by the air license and all applicable 40 CFR Part 63 MACT regulations.
- (2) The temporary unit shall meet a 98% destruction efficiency for HAPs and VOC. A destruction efficiency stack test will be conducted within 30 days of startup and the unit shall maintain and continuously monitor temperatures above 1400 °F.

DONE AND DATED IN AUGUSTA, MAINE THIS 2nd DAY OF September 2009.

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BY: 
DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 31, 2009

Date of application acceptance: August 31, 2009

Date filed with Board of Environmental Protection: _____

This Order prepared by Edwin Cousins, Bureau of Air Quality

