



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI  
GOVERNOR

DAVID P. LITTELL  
COMMISSIONER

**Robbins Lumber, Inc.  
Waldo County  
Searsmont, Maine  
A-834-71-D-T/M**

**Departmental  
Findings of Fact and Order  
Air Emission License  
Amendment # 1**

After review of the air emissions license transfer and minor revision 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 and 06-096 CMR 2, the Department finds the following facts:

**I. REGISTRATION**

**A. Introduction**

Robbins Lumber, Inc. has requested the transfer of Air Emission License A-834-71-C-R from Churchill Coatings of Maine, LLC to Robbins Lumber, Inc. through a letter to the Bureau of Air Quality dated August 31, 2009. Air Emission License A-834-71-C-R was issued to Churchill Coatings of Maine, LLC on February 8, 2008. The facility applies coatings and is located at 221 Belfast-Augusta East Road in Searsmont, Maine.

Robbins Lumber, Inc. has also requested that the existing spray coating operation located in the same building as the former Churchill Coatings of Maine, LLC be removed from Robbins Lumber, Inc. license A-156-70-A-I (the main lumber facility located several miles away) and included in this license.

In addition, the emissions inventory statement language (condition 17) of air emission license A-834-71-C-R has been updated to reflect the current requirements.

**B. Emission Equipment**

The emission equipment addressed in this air emission license includes:

**Process Equipment**

<b>Equipment</b>	<b>Unit Type</b>
Coating Machine (currently on the license)	Roller Type Paint Applicator
Spray Booths (to be added to the license)	Coating Booths with Blowers and Filters

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688 FAX: (207) 287-7826  
RAY BLDG., HOSPITAL ST.

BANGOR  
106 HOGAN ROAD, SUITE 6  
BANGOR, MAINE 04401  
(207) 941-4570 FAX: (207) 941-4584

PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04679-2094  
(207) 764-0477 FAX: (207) 760-3143

C. Application Classification

This amendment will not increase licensed emissions. Therefore, this modification is determined to be a minor revision and has been processed as such through 06-096 CMR 115.

**II. TRANSFER REQUIREMENTS**

A. Title, Right, or Interest

In the submitted application, Robbins Lumber, Inc. included a copy of the August 20, 2009 Purchase and Sale Agreement transferring ownership of the facility to Robbins Lumber, Inc. The parties have provided sufficient evidence of title, right, or interest in the facility to allow the transfer of the air emission license.

B. Financial Capacity and Intent

Robbins Lumber, Inc. states that they possess the financial capacity to operate the facility in compliance with the facility's air emission license.

C. Technical Capacity and Intent

Robbins Lumber, Inc.'s acquisition of the facility is not expected to result in any significant change in the employees that currently operate the equipment, facilities, and conduct other activities. The facility's regulatory history with the MEDEP demonstrates that the environmental personnel are competent in air pollution control. The information submitted in the application provides sufficient evidence that Robbins Lumber, Inc. has the technical capacity and intent to comply with the air emission license.

D. Full Name and Address

The full name and address of the new owner is:

Robbins Lumber, Inc.  
Ghent Road, PO Box 9  
Searsmont, ME 04973

E. Certification

Robbins Lumber, Inc. certifies that there will be no increase in air emissions beyond that provided for in the existing license, either in quantity or type.

### III. 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 (last amended December 24, 2005). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

#### B. Spray Booths

The spray booths to be added to this license are already existing at the facility and were licensed through the Robbins Lumber, Inc. license A-156-70-A-I (prior to the transfer, both Churchill Coatings and Robbins Lumber, Inc. made use of the building for their respective coating operations).

The spray booths are operated to apply a primer coat to finished wood products for Robbins Lumber, Inc.'s value-added division. The current primer has a VOC content of approximately 3.11 lb of VOC per gallon. Robbins Lumber, Inc. also uses a small amount of thinner and wood finish. These emissions shall now be included in the current facility-wide 49.9 tons VOC per year limit. Robbins Lumber, Inc. shall also include HAP emissions from the spray booths in the current facility-wide 9.9 tons of single HAP per year and 24.9 tons of total HAP per year limits.

The spray booths shall be equipped with a spray booth blower and spray booth filters. The spray booth blowers shall operate any time painting or staining of material is in process. Any coating material spilled or excess coating material shall be cleaned up immediately.

Visible emissions from each of the spray booths shall be limited to 15% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1 hour period.

Periodic monitoring for the spray booths shall include frequent inspection of the blower equipment and the spray booth filters (at least once a month), and documenting the inspections in a maintenance log. The maintenance log shall contain information on spray booth maintenance, booth failures, and corrective action.

Recordkeeping for the spray booths shall also include monthly and 12 month rolling total records indicating the usage of coating, the VOC and HAP content of the coating, and the total VOC and HAP emitted.

C. Annual Emissions

Robbins Lumber, Inc. shall continue to be restricted to the following annual emissions from all coating operations, based on a 12 month rolling total:

**Total Licensed Annual Emissions for the Facility**

**Tons/year**

(used to calculate the annual license fee)

Pollutant	Tons/Year
VOC	49.9
Individual HAP*	9.9
Total HAP*	24.9

\* HAP (Hazardous Air Pollutants) are identified by the EPA pursuant to Section 112 (b) of the Clean Air Act.

**IV. AMBIENT AIR QUALITY ANALYSIS**

Based on the total facility licensed emissions, Robbins Lumber, Inc. is below the emissions level required for modeling and monitoring.

**ORDER**

Based on the above Findings, the Department concludes that the applicant for the air emission license transfer has the capacity to satisfy all applicable statutory criteria and hereby APPROVES the transfer of Air Emission License A-834-71-C-R, from Churchill Coatings of Maine, LLC to Robbins Lumber, Inc., subject to all conditions attached to them.

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-834-71-D-T/M subject to the conditions found in Air Emission License A-834-71-C-R and in the 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 shall replace condition (17) in air emission license A-834-71-C-R:**

**(17) Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (last amended November 8, 2008), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department; or
- 2) A written emission statement containing the information required in 06-096 CMR 137.

The emission statement must be submitted as specified by the date in 06-096 CMR 137.

**The following is a new condition:**

**(19) Spray Booths**

- A. Robbins Lumber, Inc. shall operate the spray booth exhaust fans during all periods of sprayer operation. [06-096 CMR 115, BPT]
- B. Robbins Lumber, Inc. shall maintain the spray booths in good working order and any coating material spilled or excess coating material shall be cleaned up immediately. [06-096 CMR 115, BPT]
- C. Visible emissions from each of the spray booths shall be limited to 15% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1 hour period. [06-096 CMR 115, BPT]

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6

Departmental  
Findings of Fact and Order  
Air Emission License  
Amendment # 1

- D. Robbins Lumber, Inc. shall inspect the blower equipment and the spray booth filters at least once a month, and document the inspections in a maintenance log. The maintenance log shall contain information on maintenance, failures, and corrective action. [06-096 CMR 115, BPT]
- E. Robbins Lumber, Inc. shall keep monthly and 12 month rolling total records of VOC emissions generated from the operation of the spray booths. The records shall include monthly usage and the VOC content. These records shall be used to calculate the facility-wide VOC emissions. [06-096 CMR 115, BPT]
- F. Robbins Lumber, Inc. shall keep monthly and 12 month rolling total records of HAP emissions generated from the operation of the spray booths. The records shall include monthly usage and the HAP content. These records shall be used to calculate the facility-wide HAP emissions. [06-096 CMR 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 26th DAY OF October, 2009.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

**The term of this amendment shall be concurrent with the term of Air Emission License A-834-71-C-R.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: September 1, 2009

Date of application acceptance: September 8, 2009

Date filed with the Board of Environmental Protection: \_\_\_\_\_

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.

