

**Moosehead Manufacturing Company
Piscataquis County
Dover-Foxcroft, Maine
A-338-71-H-M**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #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., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

1. Moosehead Manufacturing Company (Moosehead Manufacturing) of Dover-Foxcroft, Maine was issued Air Emission License A-338-71-G-N on June 6, 2002, permitting the operation of emission sources associated with their wood furniture manufacturing facility.
2. Moosehead Manufacturing has requested a minor revision to their license in order to add two paint spray booths.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Process Equipment

<u>Equipment</u>	<u>Control Device</u>
Spray Booth 1	HVLP spray guns
	paper filters
Spray Booth 2	HVLP spray guns
	paper filters

C. Application Classification

Moosehead Manufacturing is not requesting an increase to their annual VOC limit of 41.95 tons/year; therefore this amendment will not increase emissions of any pollutant. This modification is determined to be a minor revision and has been processed as such.

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 Chapter 100 of the Department regulations. 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 Chapter 100 of the Department's regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Minor Revision Description

Moosehead Manufacturing desires to enter a new product market where wood furniture is given a "distressed" or "antique" look. The "ageing" process involves extra coating steps than were required for previous furniture lines. Most of these extra steps are brush strokes or spattering to give an aged antique look, or a fog of stain to add highlights. Many are done by hand, interrupting product flow and making the current chain coating process inadequate. The facility is proposing the installation of two paint spray booths.

The paint spray booths will be equipped with filters and will use HVLP guns and pressure pots when paint is sprayed on. Detailing may also be done with brushes. The facility estimates that its paint use will increase by approximately 5 gallons/month as a result of this change.

BACT for the Spray Booths is the use of HVLP guns, following all applicable standards from EPA's Control Technology Guideline for Wood Furniture Manufacturing sources, and equipping the spray booth with filters.

ORDER

The Department hereby grants Air Emission License Minor Revision A-338-71-H-M, subject to the conditions found in Air Emission License A-338-71-G-N 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 are new Conditions:

(23) Paint Spray Booths

(A) Exhaust from the paint spray booths shall pass through filters. The filters shall be maintained in accordance with good operational practices. Moosehead Manufacturing shall keep a log of filter maintenance and replacement. [MEDEP Chapter 115, BACT]

- (B) HVLP guns shall be used in the spray application of paint. [MEDEP Chapter 115, BACT]
- (C) Moosehead Manufacturing shall meet the applicable requirements of the CTG Work Practice Standards (outlined in Air Emission License A-338-71-G-N) in the operation of the Paint Spray Booths. [MEDEP Chapter 115, BACT]
- (D) Moosehead Manufacturing shall keep records of the amount of VOC and HAP containing material used in the Paint Spray Booths, and shall add these records to the total facility records required in Conditions (17)(A)(ii) and (17)(D)(ii) of Air Emission License A-338-71-G-N. [MEDEP Chapter 115, BACT]
- (E) Visible emissions from each of the Paint Spray Booth exhausts shall not exceed 10 percent opacity on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period. [MEDEP Chapter 101, BACT]

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2006.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-338-71-G-N.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: December 16, 2005

Date of application acceptance: December 20, 2005

Date filed with the Board of Environmental Protection: _____

This Order prepared by Rachel E. Pilling, Bureau of Air Quality.