



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**JSI Store Fixtures, Inc.
Piscataquis County
Milo, Maine
A-1065-71-A-N (SM)**

**Departmental
Findings of Fact and Order
Air Emission License**

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., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

JSI Store Fixtures, Inc. (JSI), located at 140 Park St. in Milo, ME, is an existing wood furniture manufacturing facility whose product capacity has kept them exempt from requiring an Air Emission License. Due to planned future capacity increases, JSI has applied for an Air Emission License permitting the operation of emission sources associated with their production facility.

B. Emission Equipment

Process Equipment

<u>Equipment</u>	<u>Production Rate</u>	<u>Pollution Control Equipment</u>	<u>Stack #</u>
Staining	2,928 gal/yr	None	Ambient
Lacquer	17,001 gal/yr	None	Ambient
Laminating	16,494 gal/yr	None	Ambient

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

The new source is considered a major source based on whether or not expected emissions exceed the "Significant Emission Levels" as defined in the Department's regulations. The Department has determined the facility is a minor source and the application has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended). With the coating limits on the facility, JSI is licensed below the major source thresholds and is considered a synthetic minor.

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. Wood Coating Processes

The JSI production facility uses hardwood, plywood, pressboard/laminates, foam, and various plastic components in the production of custom store displays. The assembly and finishing of these displays involve the use of stains, lacquers, and adhesives that can emit VOCs and HAPs. In 2006 JSI was inspected by the Department and it was determined that the then usage of these compounds did not warrant an Air Emission License. Future projected usage, however, will increase the emission of VOCs to a level where a License is necessary.

Surface Coating Facilities, 06-096 CMR 129 (as amended) regulates the Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) from selected surface coating operations. JSI meets the category definition of a Wood Furniture Manufacturing Operation. 06-096 CMR 129 (10)(a) references the standard to 40 CFR, Part 63, Subpart JJ. As Subpart JJ is only applicable to major sources, there are no requirements in 06-096 CMR 129 for which JSI need comply.

JSI has evaluated Thermal Oxidizers, Catalytic Oxidizers and Adsorption techniques as possible add-on pollution control technology. Based on the cost of the installation, operation, and maintenance of such equipment, JSI has determined that the installation of such equipment is not economically viable for a

facility of this size. A review of the BACT/RACT/LEAR Clearinghouse indicates that for similarly sized facilities, BACT was determined to be operational control, primarily limits on the VOC content of the coatings or usage thresholds. Therefore, BACT for JSI shall consist of good operating practices to minimize VOC and HAP emissions, and the continual reevaluation of new coating additives to reduce VOC and HAP content:

JSI has accepted a VOC emission limit of 49.0 tons year on a 12-month rolling total for all stains, lacquers, and adhesives. JSI also accepts a HAP limit of 9.9 tons on a 12-month rolling total for any single HAP and a total HAP emission limit of 24.9 tons on a 12-month rolling total for all stains, lacquers, and adhesives. Compliance with the VOC and HAP limits shall be demonstrated through records maintained on a 12-month rolling total basis, showing the amount of each type of material used, percent VOC and HAP of the material (from the MSDS sheet), material weight and total VOC and HAP emitted through use of that material.

Visible emissions from the Wood Coating Processes shall not exceed 10 percent opacity on a 6-minute block average basis, except for no more than one (1), six (6) minute block average in a 1-hour period.

C. General Process Emissions

Visible emissions from any general process source shall not exceed an opacity of 20% 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.

D. Annual Emissions

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	Single HAP	Total HAP
Total TPY	-	-	-	-	-	49.0	9.9	24.9

III. AMBIENT AIR QUALITY ANALYSIS

According to 06-096 CMR 115 (as amended), the level of air quality analyses required for a minor new source shall be determined on a case-by case basis. Based on the information available in the file and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source.

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-1065-71-A-N (SM) subject to 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.

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S.A. §347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [06-096 CMR 115]
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 CMR 115]
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]

- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353-A. [06-096 CMR 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
 - A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 2. pursuant to any other requirement of this license to perform stack testing.
 - B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - C. submit a written report to the Department within thirty (30) days from date of test completion.[06-096 CMR 115]

- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
 - B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
- [06-096 CMR 115]
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

SPECIFIC CONDITIONS

(16) Wood Coating Processes

- A. JSI is limited to 49.0 tons of VOC year on a 12-month rolling total for all stains, lacquers, and adhesives. Compliance with the VOC and HAP limits shall be demonstrated through records maintained on a 12-month rolling total basis, showing the amount of each type of material used, percent VOC of the material (from the MSDS sheet), material weight and total VOC emitted through use of that material. [06-096 CMR 115, BACT]
- B. JSI is limited to 9.9 tons on a 12-month rolling total for any single HAP and a total HAP emission limit of 24.9 tons on a 12-month rolling total for all stains, lacquers, and adhesives. Compliance with the HAP limits shall be demonstrated through records maintained on a 12-month rolling total basis, showing the amount of each type of material used, percent HAP of the material (from the MSDS sheet), material weight and total HAP emitted through use of that material.
- C. Visible emissions from the Wood Coating Processes shall not exceed 10 percent opacity on a 6-minute block average basis, except for no more than one (1), six (6) minute block average in a 1-hour period.

(17) General Process Sources

Visible emissions from any general process source shall not exceed an opacity of 20% 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 101]

(18) Annual Emission Statement

In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), 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.

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A-1065-71-A-N (SM)

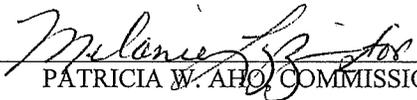
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- (19) JSI shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 18th DAY OF December, 2011.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: 
PATRICIA W. AHO, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 9/8/2011

Date of application acceptance: 9/28/2011

Date filed with the Board of Environmental Protection:

This Order prepared by Jonathan Voisine, Bureau of Air Quality.

