

**HUBER ENGINEERED WOODS, LLC.)
AROOSTOOK COUNTY)
EASTON, MAINE)
A-62-70-C-A)**

**DEPARTMENTAL
FINDING OF FACT AND ORDER
AIR EMISSION LICENSE
AMENDMENT #1**

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

Huber Engineered Woods, LLC (Huber) is licensed to operate several emission sources from their oriented strand board (OSB) plant located in Easton, Maine. Huber has requested a Part 70 Major Change for several license clarifications. This amendment addresses these changes and their associated emissions.

Introduction

FACILITY	Huber Engineered Woods, LLC (Huber)
LICENSE NUMBER	A-63-70-C-A
LICENSE TYPE	Part 70 Section 502(b)(10) Change
NAICS CODES	321219
NATURE OF BUSINESS	Oriented Strand Board Manufacturer
FACILITY LOCATION	Station Road Easton, Maine
DATE OF LICENSE ISSUANCE	July 31, 2003
DATE OF AMENDMENT ISSUANCE	May 7, 2004
LICENSE EXPIRATION DATE	July 31, 2008

B. Application Classification

This application seeks a license change that does not qualify as a Part 70 Minor or Major Modification, Hazardous Air Pollution (HAP) emission limitations, Part 70 Minor Change or Part 70 Administrative Revision. This application seeks a

case-by-case emissions control determination by the Department (i.e. BPT). Therefore, this application meets the criteria for a Part 70 Major Change and the application shall be processed as a Major Change to the Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

C. Revision Description

Huber has requested several changes to its Part 70 Air Emission License, A-62-70-A-I. The following sections describe the changes requested and the equipment involved.

1. *Recordkeeping Clarification*

Condition (14)(H) and (15)(F) of Part 70 Air Emission License require Huber to record certain periodic monitoring data "once every shift" on its EFB and ESPs. Huber operates two shifts some days and three shifts on others. This results in an inconsistent frequency for recording the required monitoring data. To eliminate the variability in the required frequency of recording data, and to enable Huber to establish a more consistent and clear recordkeeping program for its operators, the facility requests that the phrases "once every shift" in Conditions (14)(H) and (15)(F) be clarified to read "once every 12-hours (7:00 a.m. to 7:00 p.m. to 7:00 p.m. to 7:00 a.m.)"

2. *Typographical Error*

Condition (15)(F) mistakenly refers to Condition (25)(A)(2). The phrase "allowed by Condition (25)(A)(2) will be removed."

3. *ESP Spare Parts Inventory*

Condition 15(J) requires that the facility maintain the manufacturer's suggested spare parts inventory onsite. This includes many components readily available from local vendors and is quite extensive. Huber has requested that this requirement be modified to focus on critical spare parts for operation. The license will replace the phrase "spare parts inventory" with "critical spare parts inventory".

4. *Relocation of Sanding, Tongue and Groove, Branding and Edge Spraying*

Huber intends to relocate its sanding, tongue and groove, branding and edge spraying activities. The relocation is intended to consolidate these activities in a

manner that will reduce forklift traffic and free up storage space. As part of the relocation, some components of this equipment will be replaced. Neither the new components nor the relocation will increase emissions. In fact, the improvements to sanding and edge spraying booth will likely reduce emissions from those activities.

5. *Ink jet Printer*

In 2001, Huber installed an ink jet printer system to apply brand name and nail dot matrix to the surface of its oriented-strand board (OSB) products at its Easton facility. The ink jet printer was licensed by the Department in Air License Amendment A-62-71-M-A and subsequently in Huber's Part 70 Air License. Condition (18) of Huber's Part 70 Air License limits total VOC emissions from the ink jet printer to 8 tons per year (tpy) on a 12-month rolling total basis.

The logo and nail grid patterns applied by the ink jet printing system have proven to be in greater demand by Huber's customers than originally expected. Huber's current rate of ink usage would result in a approximately 6 tons per year of VOCs. However, to meet the growing customer demand, Huber will need to use the ink jet printer on a greater percentage of the OSB produced than it does currently and resulting VOCs are projected to be over 8 tpy in the near future.

Huber's Research and Development Department has extensively tested various inks, including water-based inks. To be acceptable, an ink must dry quickly and not migrate through vinyl flooring, such as linoleum. Only two inks provide the needed qualities in the ink jet printer system and both are solvent-based. Huber does not foresee any breakthroughs in ink technology occurring in the near future that would enable it to use the water-based inks instead of solvent-based inks. Therefore, Huber is requesting that the 8 tpy limit set forth in Condition (18) of its Part 70 Air License be increased to 11.9 tpy. When the ink jet printer system is relocated, several components will be replaced with identical but new components.

6. *Sanding*

Condition (20) of the Part 70 Air License, which is "Enforceable by State-only", lists several baghouses which control wood dust from various activities at the Easton plant. As part of the relocation, Huber is proposing to replace its existing sander and tongue and groove line with a new sander and tongue and groove line. The new sander and tongue and groove machines would be controlled by the existing baghouse for the rim and grade baghouse. The saws, which are currently

picked up by the trim and grade baghouse, will then be picked up by the existing sander baghouse. This project will not involve any new emissions. In fact, because the new sander and tongue and groove machine is more efficient than the old sander, the new system requires considerably less air and, therefore, loading to the baghouse from sanding is expected to be reduced. As a part of this project, Huber will also be installing abort gates on both baghouses. Abort gates follow detection eyes. Which will prevent fire from reaching the baghouse and causing explosions.

7. *Edge Spraying*

Condition (19) of the Part 70 Air License, which is “enforceable by State-only”, limits the VOC content of the edge sprays to two percent or less of VOCs. As part of the relocation, Huber will be replacing one of this two existing spray booths and mothballing the other. The relocated spray booth is expected to be more efficient than the existing spray booths and, therefore, VOCs and PM emissions are expected to be reduced. Huber will continue to apply edge sprays containing tow percent or less VOCs.

ORDER

The changes above meet the requirement for a Part 70 Major Change. Because these changes do not result in licensed emissions increases of 4 tpy or more of VOCs or particulate, they are not minor modifications as defined in Chapter 100. These changes do not involve HAP emission limitations, and do not qualify for Part 70 Minor Changes or Part 70 Administrative Revision Procedures.

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 amendment, A-62-71-M-A, subject to the conditions found in Air Emission License A-62-72-A-R and subsequent amendments, in addition to the following conditions:

(1) The following condition will replace Condition (14)(H) of Air Emission License, A-62-70-A-I.

H. Huber shall monitor and record the voltage and amperage (periodic monitors) once every 12-hours (7:00 a.m. to 7:00 p.m. and 7:00 p.m. to 7:00 a.m.) on each EFB bed and ionizer. The requirement to record voltage and amperage does not apply during periods of periodic monitor malfunction. [MEDEP Chapter 140, BPT]

(2) The following condition will replace Condition (15)(F) of Air Emission License, A-62-70-A-I.

F. Huber shall record the voltage and amperage (periodic monitors) once every 12-hours (7:00 a.m. to 7:00 p.m. and 7:00 p.m. to 7:00 a.m.) for each ESP. The requirement to record voltage and amperage does not apply during periods of downtime or repair of the ESP or during periodic monitor malfunction. [MEDEP Chapter 140, BPT]

(3) The following condition will replace Condition (15)(J) of Air Emission License, A-62-70-A-I.

J. Huber will maintain a critical spare parts inventory on site as suggested by the manufacturer of the wet ESP. [MEDEP Chapter 115, BACT] [Enforceable by state-only]

(4) The following condition will replace Condition (18) of Air Emission License, A-62-70-A-I.

(18) Huber shall maintain monthly records of the amounts and VOC content of ink used in the ink jet printer and records of maintenance and tune-ups/repairs. The total VOC emission shall not exceed 11.9 tons per year on a 12-month rolling total from this process. [MEDEP Chapter 140, BPT]

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DONE AND DATED IN AUGUSTA, MAINE THIS _____ DAY OF _____ 2004.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-62-70-A-I.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 1, 2004

Date of application acceptance: March 17, 2004

Date filed with Board of Environmental Protection: _____

This order prepared by Edwin Cousins, Bureau of Air Quality