

**Fraser Timber Limited
Aroostook County
Masardis, Maine
A-165-70-C-A**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #1**

After review of the Part 70 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

A. Introduction

FACILITY	Fraser Timber Limited (FTL)
CURRENT RENEWAL NUMBER	A-165-70-B-R
LICENSE TYPE	Part 70 Significant Modification
NAICS CODES	321113, 321999
NATURE OF BUSINESS	Lumber Manufacturer
FACILITY LOCATION	Masardis, Maine
CURRENT RENEWAL ISSUANCE DATE	March 4, 2005
AMENDMENT ISSUANCE DATE	January 10, 2007
LICENSE EXPIRATION DATE	March 4, 2010

B. Amendment Description

Fraser Timber Limited (FTL) operates two wood-fired boilers to provide steam to the facility's drying kilns. Emissions of Hazardous Air Pollutants (HAPs) come primarily from this equipment. Based on the current published emission factors and actual operating levels for its boilers and dry kilns, FTL does not have actual HAP emissions in excess of major source thresholds. However, based on the current maximum operating limits, FTL has the potential to emit Methanol in excess of 10 tons/year.

FTL has requested a modification to their license to reduce their kiln throughput limit from 180 MMBF/year to 152 MMBF/year in order to be classified as a minor source of HAPs and therefore exempt from EPA's National Emission Standards for Hazardous Air Pollutants, specifically 40 CFR Part 63, Subpart DDDDD (Boiler MACT).

Emission factors for individual HAPs released from drying kilns of spruce lumber recently became available through an update to its publication entitled *Handbook of Substance-Specific Information of National Pollutant Release Inventory*

Reporting, also known as the “NPRI Handbook”. The NPRI Handbook is designed to assist NCASI’s Canadian members with reporting requirements under Environment Canada’s NPRI program which is similar to EPA’s Toxics Release Inventory (TRI) reporting program. NCASI has indicated that they intend to publish the kiln VOC/HAP data in their next update to their *Handbook of Chemical-Specific Information for SARA Section 313 Form R Reporting*, also known as the “SARA Handbook”.

The NPRI Handbook provided emissions data for White Spruce and Black Spruce. To establish appropriate emission factors for the predominant wood species processed at FTL (Red Spruce), NCASI personnel suggested using the average of the data for white and black spruce. Based on these emission factors and a throughput limit of 152 MMBF/year, FTL will be limited to a maximum single HAP emission of methanol of 9.9 ton/year and total HAP emissions of less than 24.9 ton/year.

Annual emissions of VOCs have been recalculated in this amendment based on the revised facility throughput limit.

C. Application Classification

The application for FTL does not include the installation of new equipment and will not result in an increase in any regulated pollutant. Therefore, this application has been classified as a Part 70 Significant Modification and has been processed as such.

D. Facility Emissions

Total Licensed Annual Emission 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
Boiler #1	35.5	35.5	1.0	19.7	178.7	2.9	--	--
Boiler #3	16.0	16.0	0.5	8.9	80.8	1.3	--	--
Kilns	--	--	--	--	--	97.5	--	--
Total Facility Limit	--	--	--	--	--	--	9.9	24.9
	51.5	51.5	1.5	28.6	259.5	101.7	9.9	24.9

II. AIR QUALITY ANALYSIS

FTL previously submitted an ambient air quality analysis (A-165-70-A-I) demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Part 70 License Significant Modification.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-165-70-C-A pursuant to MEDEP Chapter 140 and subject to the standard and special conditions below.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

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 Standard Statement (6)(B) of Air Emission License A 165-70-B-R:

- B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated September 21, 2004 and September 28, 2006.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
A	Facility	MEDEP Chapter 104	Incinerator Particulate Emission Standard	Boilers #1 & #3 are not incinerators
B	Facility	MEDEP Chapter 129	Surface Coating	there are no applicable sources at this site.
C	Facility	MEDEP Chapter 134	VOC RACT	Boilers are exempt per Sec.1.C.4 Kilns are exempt per Sec. 1.C.6 The remaining equipment totals less than 40 ton/year of VOCs.
D	Facility	MEDEP Chapter 138	NOx RACT	Facility emits less than 100 ton/yr of NOx.
E	Boilers #1 & #3	40 CFR 60, Subparts D, Da, Db	Steam Generating Units	Both units have heat inputs less than 100 MMBtu/hr.
F	Boilers #1 & #3	40 CFR 60, Subpart Dc	Steam Generating Units	Both units were installed prior to June 1989.
G	Gasoline Storage	40 CFR 60, Subparts K, Ka, Kb	Storage Vessels for Petroleum Liquids	Tank capacity is less than 10,000 gallons.
H	Facility	40 CFR 63	NESHAP	License contains federally enforceable limits of 9.9 single and 24.9 total HAP.

[MEDEP Chapter 140]

The following shall replace Special Condition (15) of Air Emission License A-165-70-B-R:

(15) Drying Kilns

FTL shall not exceed a yearly throughput of 152 million board feet per year based on a 12 month rolling total. FTL shall keep monthly records of board feet processed. [MEDEP Chapter 140, BPT]

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The following are New Conditions:

- (29) Facility wide emissions of HAPs listed in Section 112(b) of the Clean Air Act shall not exceed 9.9 ton/year for any single HAP and 24.9 ton/year for all HAPs combined, both based on a 12-month rolling total. FTL shall maintain monthly records to demonstrate compliance with this limit. [MEDEP Chapter 140, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS _____ DAY OF _____ 2007.

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-165-70-B-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 9/29/06

Date of application acceptance: 10/2/06

Date filed with the Board of Environmental Protection: _____

This Order prepared by Lynn Ross, Bureau of Air Quality.