

PIONEER PLASTICS CORPORATION)	DEPARTMENTAL
ANDROSCOGGIN COUNTY)	FINDINGS OF FACT AND ORDER
AUBURN, MAINE)	AIR EMISSION LICENSE
A-448-70-B-A)	AMENDMENT #1

After review of the Part 70 Air Emissions License, staff investigation reports, EPA Region I comments, 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

Pioneer Plastic’s Part 70 air emission license is being “Reopened for Cause” by the Department.

FACILITY	Pioneer Plastics Corporation (Pioneer)
LICENSE NUMBER	A-448-70-B-A
LICENSE TYPE	Part 70 License Reopen for Cause
NAICS CODES	325211, 322222, 32613
NATURE OF BUSINESS	Manufacturer of decorative laminate, melamine coated paper, and specialty resins
FACILITY LOCATION	Auburn, Maine
DATE OF INITIAL LICENSE ISSUANCE	April 20, 2004
DATE OF MINOR REVISION ISSUANCE	October 27, 2004
LICENSE EXPIRATION DATE	April 20, 2009

B. Application Classification

Pioneer’s Part 70 air emissions license was issued April 20, 2004. The license is being reopened in part because a public notification is necessary when applicable requirements are included in the air emissions license. Also, some conditions in the Part 70 air license could be more specific. Therefore, this amendment will address these concerns.

This application is being processed as an amendment of a Part 70 source, under the requirements of Section 2 (N) “Reopening for cause by the Department of a Part 70 license” of Chapter 140 of the Department’s regulations.

II. AMENDMENT DESCRIPTION

Reopening for Cause

Pioneer's Part 70 air emissions license is reopened to allow for a public notice of applicable requirements included in its air permit. The Part 70 air emissions license was issued April 20, 2004 with a public notification of draft license availability published November 2003 and a draft sent to EPA Region I in February 2004. Between the time of February 2004 and April 2004, an applicable Maximum Achievable Control Technology (MACT) requirement was included in the Order section of Pioneer's Part 70 air emissions license. This federal requirement, which pertains to the inclusion of the Organic Liquid Distribution MACT, needs to allow an opportunity for public comment.

This amendment also will also update these conditions with more specific language for a better understanding of what equipment and processes the conditions pertain to. The following describes the areas where clarification is sought:

A. Phenolic Resin Blending: Reactor K3

Currently Condition (20) B a. states the following:

- B. Phenolic Resin Blending: Reactor K3 is subject to the POWC 40 C.F.R. Part 63, Subpart JJJJ and OLD 40 CFR Part 63, Subpart EEEE:
- a. Pioneer's phenolic blending reactor K3 is part of the Paper and Other Web Coating National Emission Standards for Hazardous Air Pollutants (POWC) [40 C.F.R. Part 63, Subpart JJJJ] source category but not part of the affected source. This makes this operation subject to the requirements of the Organic Liquid Distribution MACT. The OLD rule was finalized on February 3, 2004 with a compliance date of February 5, 2007. This source shall meet the requirements specified in (23)D. below.

- a. The compliance date shall be February 5, 2007.
- b. An Initial Notification in accordance with 40 CFR 63.2382 (b) and 63.9(b) shall be submitted no later than June 2, 2004.
- c. An Initial Notification of Compliance Status per 40 CFR 63.2382(d) shall be submitted.
- d. The equipment shall meet the emission limitations as specified in 40 CFR 63.2346.
- e. The facility shall develop a work practice plan in accordance with 40 CFR 63.2346.
- f. The facility shall develop a Start-up, Shut-down and Malfunction Plan in accordance with 40 CFR 63.2350 (c).
- g. If a control device is used, the facility shall meet the operating limits specified in 40 CFR 63.2346 and shall conduct a Performance Test as required by 40 CFR 63.2354. The performance test must be conducted according to the schedule specified in 40 CFR 63.2358
- h. The facility shall comply with the continuous compliance and monitoring of 40 CFR 63.2374 and 63.2378.
- i. The facility shall prepare and submit semiannual compliance reports in accordance with MEDEP Chapter 140.
- j. Recordkeeping shall include documents specified in 40 CFR 63.2390.

The condition did not reference 63.2386, 63.2366, or 63.2394. This has been corrected in this amendment.

B. Polyester Resin Reactors K4, K5, K6, K7, and K8

Currently Condition (21) B a. states the following:

- B. Polyester Resin Reactors K4, K5, K6, K7, and K8 are subject to the MON Requirements 40 C.F.R. Part 63, Subpart FFFF

- a. Pioneer's polyester reactors K4, K5, K6, K7, and K8 are likely to be subject to the Miscellaneous Organic Chemical Production Processes National Emission Standards for Hazardous Air Pollutants (MON) because this MACT rule includes, among other source subcategories, Alkyd Resins Production and Polyester Resins Production, [40 C.F.R. Part 63, Subpart FFFF]. The MON rule was finalized on November 10, 2003 with a compliance date of November 10, 2006.

The phrase, Pioneer's reactors "are likely to be subject" is not appropriate. This wording was used in the drafting of the Part 70 air license before the MACT was finalized and was carried through license issuance. The MON rule is final and Pioneer's above listed reactors are subject to it, therefore "likely to be" will be removed.

C. Surface Coating Press

The Surface Coating Press, which will now be referred to as the Drillboard Press Plate, as described in Condition (27) does not accurately represent the actual nature of operation of this process. Pioneer does not coat aluminum or any other metal substrate for product sale. The following description is more true to this operation and therefore the Part 70 Finding of Fact Item 5, Surface Coating Press (Page 28) should be changed to the following:

Drillboard Press Plate (DPP) Preparation:

Pioneer operates a process where aluminum press plates are prepared for use in the production of a DPP laminate. The plates are heated and then a release aid is applied to prevent the plates from sticking to the laminate in the press. The release aid is applied by a pneumatic air spray gun to the heated plate. Reapplication is done when the release properties of the plate begin to diminish. VOC emissions from this process are less than 2000 pounds per year.

Periodic Monitoring

Periodic monitoring for the DPP shall consist of record keeping including monthly records of coating used and the mass of VOC emitted each month.

The release aid used does not contain HAPs so MACT is not applicable. Also, MEDEP Chapter 129 regulations pertaining to coating of Miscellaneous Metal Parts is not applicable to this drillboard press plate.

Currently Condition (27) states the following:

Surface Coating Press

- a. The surface coating press unit shall not emit in excess of 1,666 pounds of VOC in any calendar month.
- b. Pioneer shall maintain monthly records to document the name and identification of each coating and the mass of VOC per volume of each coating, excluding water and exempt compounds, as applied, used each month in the surface coating press, and the total emissions at the unit each month. [MEDEP Chapter 129]

This condition will be replaced with the following:

Drillboard Press Plate Preparation

- a. The drillboard press plate preparation process shall not emit in excess of 2,000 pounds of VOC in any calendar year.
- b. Pioneer shall maintain monthly records to document the volume of release aid used and the mass of VOC emitted each month in the plate preparation. [MEDEP Chapter 140]

D. Storage Tanks

Pioneer has several tanks that meet the applicability requirements of the Organic Liquid Distribution MACT because they are not included as part of the affected source of another MACT regulation. Storage tanks 29, 45, 46, 47, 48, 49 and 60 are subject to the rule but do not require controls based on their vapor pressure and the rule requirements. These tanks will be subject to the equipment leak component requirements and the recordkeeping and reporting requirements. This rule also applies to the tanks and equipment containing “organic liquids” with greater than 5% HAPs that meet the Paper and Other Web Coating MACT source category but are classified as ancillary operations and not included as part of the affected source. The only one of these tanks that will require controls is the K3 reactor which is included in Permit Condition (20). There are a number of smaller tanks that are used for mixing/blending of coating ingredients, mixing for viscosity adjustment and used for additive blending prior to application to the treaters/coaters. There are also tanks used for the cleaning of coating lines and coating line parts and the conveyance and treatment of wastewater that are also subject to the Paper and Other Web Coating source category. These tanks would

be subject to the equipment leak component requirements and also the recordkeeping and reporting requirements of the rule.

Currently Condition (28) b. states the following:

Pioneer's applicable "affiliated equipment" as defined in the Paper and Other Web Coating MACT are subject to the Organic Liquid Distribution MACT (40 CFR Part 63, Subpart EEEE) that was promulgated on February 3, 2004 with a compliance date of February 5, 2007.

This condition is considered too vague and will be replaced with the following:

Pioneer has a number of storage tanks subject to the Organic Liquid Distribution MACT (40 CFR Part 63, Subpart EEEE) that was promulgated on February 3, 2004 with a compliance date of February 5, 2007.

1. Storage Tanks 29, 45, 46, 47, 48, 49 and 60 are subject to the rule but do not require controls based on their vapor pressure and the rule requirements. These tanks will be subject to the equipment leak component requirements and the recordkeeping and reporting requirements .
2. Pioneer's applicable "affiliated equipment" as defined in the Paper and Other Web Coating MACT are subject to the rule. This includes equipment used for the mixing/blending of coating ingredients, mixing for viscosity adjustment and used for additive blending prior to application to the treaters/coaters. Tanks used for the cleaning of coating lines and coating line parts and the conveyance and treatment of wastewater subject to the Paper and Other Web Coating source category are also subject. These tanks will be subject to the equipment leak component and the recordkeeping and reporting requirements of the rule. The K3 reactor is also subject to this rule and is included as Permit Condition (20)

E. Chemical Loading/Unloading

HAP Emissions

The facility conducts operations that are potentially subject to the National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline) NESHAP (40 CFR Part 63 Subpart EEEE) depending on

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concentration of HAPs in the material being transferred, its vapor pressure and its annual throughput. At the present time the facility has three unloading operations (methanol, formaldehyde and phenolic resins) that meet the applicability requirement of the rule. There are however no control requirements for existing transfer operations into a facility. The methanol and phenolic resin unloading operations would be subject to the equipment leak component requirements of the rule and also the reporting and recordkeeping requirements. The formaldehyde is unloaded into a tank that is part of the affected source of the Amino/Phenolic MACT and therefore the equipment leak components are exempt from the OLD MACT. This operation would be subject to 40 CFR Part 63.2386(d). At the present time the facility does not load any materials that meet the definition of an “organic liquid” as defined in the rule. As all of the materials that are transferred out of the facility are less than 5% HAPs. Since the facility does not load vehicles with “organic liquids” the requirements for transport vehicles are not applicable.

The facility also unloads some materials that are used in the polyester resin production operation at the facility. This portion of the operation is subject to the requirements on the National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing (40 CFR Part 63 Subpart FFFF).

Currently Condition (31) states the following:

Pioneer’s applicable chemical loading/unloading activities are subject to Organic Liquids Distribution (Non-Gasoline) NESHAP (40 CFR Part 63 Subpart EEEE) that was promulgated on February 3, 2004 with a compliance date of February 5, 2007.

This condition is considered too vague and there was insufficient information in the finding of facts in the original permit. Replacement text for the Permit Condition (31) is included below:

Pioneer’s unloading operations for methanol, formaldehyde and purchased phenolic resins meet the applicability requirements of the Organic Liquids Distribution (Non-Gasoline) NESHAP (40 CFR Part 63 Subpart EEEE) that was promulgated on February 3, 2004 with a compliance date of February 5, 2007.

- a. The unloading operations for methanol and phenolic resins will be subject to the equipment leak components requirements of the rule and also the recordkeeping and monitoring requirements.

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- b. The unloading operations for the formaldehyde will be subject to the recordkeeping and reporting requirements in 40 CFR Part 63.2386(d).

ORDER

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

- will meet existing 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 Amendment, A-448-70-B-A, subject to the following conditions:

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

SPECIAL CONDITIONS

(1) The following condition shall replace Condition (20) B of Air Emission License, A-448-70-A-A/I:

(20) B. Phenolic Resin Blending: Reactor K3 is subject to the POWC 40 C.F.R. Part 63, Subpart JJJJ and OLD 40 CFR Part 63, Subpart EEEE:

- a. Pioneer's phenolic blending reactor K3 is part of the Paper and Other Web Coating National Emission Standards for Hazardous Air Pollutants (POWC) [40 C.F.R. Part 63, Subpart JJJJ] source category but not part of the affected source. This makes this operation subject to the requirements of the Organic Liquid Distribution MACT. The OLD rule was finalized on February 3, 2004 with a compliance date of February 5, 2007. This source shall meet the requirements specified in (23)D. below.

- a. The compliance date shall be February 5, 2007.
 - b. An Initial Notification in accordance with 40 CFR 63.2382 (b) and 63.9(b) shall be submitted no later than June 2, 2004.
 - c. An Initial Notification of Compliance Status per 40 CFR 63.2382(d) shall be submitted.
 - d. The equipment shall meet the emission limitations as specified in 40 CFR 63.2346.
 - e. The facility shall develop a work practice plan in accordance with 40 CFR 63.2346.
 - f. The facility shall develop a Start-up, Shut-down and Malfunction Plan in accordance with 40 CFR 63.2350 (c).
 - g. If a control device is used, the facility shall meet the operating limits specified in 40 CFR 63.2346 and shall conduct a Performance Test as required by 40 CFR 63.2354. The performance test must be conducted according to the schedule specified in 40 CFR 63.2358
 - h. The facility shall comply with the continuous compliance and monitoring of 40 CFR 63.2366, 63.2374, and 63.2378.
 - i. The facility shall comply with the reporting requirements of 40 CFR 63.2386 and MEDEP Chapter 140.
 - j. Recordkeeping shall include documents specified in 40 CFR 63.2390 and shall be kept in accordance with 63.2394.
- (2) The following condition shall replace Condition (21) B of Air Emission License, A-448-70-A-A/I:**
- B. Polyester Resin Reactors K4, K5, K6, K7, and K8 are subject to the MON Requirements 40 C.F.R. Part 63, Subpart FFFF
 - a. Pioneer's polyester reactors K4, K5, K6, K7, and K8 are subject to the Miscellaneous Organic Chemical Production Processes National Emission Standards for Hazardous Air Pollutants (MON) because this MACT rule includes, among other source subcategories, Alkyd Resins Production and Polyester Resins

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Production, [40 C.F.R. Part 63, Subpart FFFF]. The MON rule was finalized on November 10, 2003 with a compliance date of November 10, 2006.

(3) The following condition shall replace Condition (27) of Air Emission License, A-448-70-A-A/I:

(27) Drillboard Press Plate Preparation

- a. The drillboard press plate preparation process shall not emit in excess of 2,000 pounds of VOC in any calendar year.
- b. Pioneer shall maintain monthly records to document the volume of release aid used and the mass of VOC emitted each month in the plate preparation [MEDEP Chapter 140]

(4) The following condition shall replace Condition (28) b. of Air Emission License, A-448-70-A-A/I:

(28)b. Pioneer has a number of storage tanks subject to the Organic Liquid Distribution MACT (40 CFR Part 63, Subpart EEEE) that was promulgated on February 3, 2004 with a compliance date of February 5, 2007.

1. Storage Tanks 29, 45, 46, 47, 48, 49 and 60 are subject to the rule but do not require controls based on their vapor pressure and the rule requirements. These tanks will be subject to the equipment leak component requirements and the recordkeeping and reporting requirements.
2. Pioneer's applicable "affiliated equipment" as defined in the Paper and Other Web Coating MACT are subject to the rule. This includes equipment used for the mixing/blending of coating ingredients, mixing for viscosity adjustment and used for additive blending prior to application to the treaters/coaters. Tanks used for the cleaning of coating lines and coating line parts and the conveyance and treatment of wastewater subject to the Paper and Other Web Coating source category are also subject. These tanks will be subject to the equipment leak component and the recordkeeping and reporting requirements of the rule. The K3 reactor is also subject to this rule and is included as Permit Condition (20)

(5) The following condition shall replace Condition (31) of Air Emission License, A-448-70-A-A/I:

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(31) Chemical Loading/Unloading Operations

Pioneer's unloading operations for methanol, formaldehyde and purchased phenolic resins meet the applicability requirements of the Organic Liquids Distribution (Non-Gasoline) NESHAP (40 CFR Part 63 Subpart EEEE) that was promulgated on February 3, 2004 with a compliance date of February 5, 2007.

- a. The unloading operations for methanol and phenolic resins will be subject to the equipment leak components requirements of the rule and also the recordkeeping and monitoring requirements.
- b. The unloading operations for the formaldehyde will be subject to the recordkeeping and reporting requirements in 40 CFR Part 63.2386(d).

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-448-70-A-I.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: May 3, 2004
Date of application acceptance: May 3, 2004
Date filed with the Board of Environmental Protection _____

This Order prepared by Edwin Cousins, Bureau of Air Quality.