



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE  
GOVERNOR

PAUL MERCER  
COMMISSIONER

**Lignetics of Maine, LLC  
Franklin County  
Strong, Maine  
A-342-71-W-M (SM)**

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

**FINDINGS OF FACT**

After review of the air emission license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

Geneva Wood Fuels, LLC was issued Air Emission License A-342-71-T-R/A on July 8, 2013 permitting the operation of emission sources associated with their wood pellet manufacturing facility. The license was subsequently transferred to GF Funding LLC on December 9, 2014 (A-342-71-U-T) and then to Lignetics of Maine, LLC (Lignetics) on November 6, 2015 (A-342-71-V-T).

Lignetics has requested a minor revision to their license in order to postpone stack testing of the Dryer.

The equipment addressed in this license is located at 30 Norton Hill Road in Strong, Maine.

**B. Emission Equipment**

The following equipment is addressed in this air emission license:

<b>Equipment</b>	<b>Maximum Capacity (MMBtu/hr)</b>	<b>Maximum Firing Rate</b>	<b>Fuel Type</b>	<b>Date of Manuf.</b>	<b>Pollution Control Equipment</b>
Dryer	40	9073 lb/hr	wood (50% moisture)	2010	Multi-cyclone

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 04769  
(207) 764-0477 FAX: (207) 760-3143

C. Application Classification

This amendment will not increase emissions of any pollutant. Therefore, this amendment 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 *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Revision Description

Lignetics' current air emission license requires compliance stack testing of the Dryer for PM within three years of the license issuance (i.e. by July 8, 2016) and every three years thereafter. Due to current market conditions, the facility is operating in a significantly reduced capacity. The facility currently operates mainly on weekends to take advantage of more favorable electricity rates.

Since operations are so limited, Lignetics has requested an extension of their deadline to perform testing. The Department agrees that requiring testing of equipment that is operating intermittently for short periods of time would be inappropriate and therefore, agrees to extend the performance test deadline for one year. If Lignetics continues to operate on such a limited basis, the deadline may be extended to 2018.

C. Annual Emissions

This amendment does not change any licensed annual emissions from Lignetics.

**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, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License Amendment A-342-71-W-M subject to the conditions found in Air Emission License A-342-71-T-R/A, in transfers A-342-71-U-T and A-342-71-V-T, and the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License Amendment shall not affect the remainder of the provision or any other provisions. This License Amendment shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

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Lignetics of Maine, LLC  
Franklin County  
Strong, Maine  
A-342-71-W-M (SM)

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**SPECIFIC CONDITIONS**

The following shall replace Condition (17)(I) of Air Emission License A-342-71-T-R/A:

(17) **Dryer**

I. Compliance Testing

1. Lignetics shall perform compliance stack testing for PM on the Dryer, in accordance with the appropriate EPA test methods, by July 31, 2017. If the Dryer operates for less than 2,000 hours between May 1, 2016 and May 1, 2017, the due date for compliance stack testing shall be extended to July 31, 2018. Subsequent compliance stack testing shall be performed once every three calendar years thereafter with no more than 38 months between tests.  
[06-096 CMR 115, BPT]
2. If Lignetics requests an extension of the compliance stack testing deadline to July 31, 2018, the facility shall submit to the Department the number of hours the Dryer operated between May 1, 2016 and May 1, 2017 by May 15, 2017.  
[06-096 CMR 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 23 DAY OF May, 2016.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Paul Allen Robert Cone for*  
PAUL MERCER, COMMISSIONER

**The term of this amendment shall be concurrent with the term of Air Emission License A-342-71-T-R/A.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 4/6/16  
Date of application acceptance: 4/12/16

Date filed with the Board of Environmental Protection:

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

