



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

DEPARTMENT ORDER

Northeast Packaging Co.
Aroostook County
Presque Isle, Maine
A-894-71-E-M

Departmental
Findings of Fact and Order
Air Emission License
Amendment 2

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 (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Northeast Packaging Co. (NEPCO) was issued Air Emission License A-894-71-C-R on 11/1/13, for the operation of emission sources associated with their printing facility. The license was subsequently amended on 2/7/2019 (A-894-71-D-A).

NEPCO has requested a minor revision to their license in order to notate the addition of two new bagging machines.

The equipment addressed in this license amendment is located at 875 Skyway Street, Presque Isle, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license amendment:

Process Equipment

Equipment	Production Rate	Pollution Control Equipment	Install Date
Bagging Machine #6	275 bags/min	electrostatic filter	2020
Bagging Machine #7	275 bags/min	electrostatic filter	2020

C. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the date this license was issued.

This amendment will not increase licensed emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

D. Facility Classification

With the facility wide volatile organic compounds (VOC) limit, the facility is licensed as follows:

- As a synthetic minor source of air emissions, because NEPCO is subject to license restrictions that keep facility emissions below major source thresholds for criteria pollutants; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

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 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment.

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 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

B. Bagging Machines #6 and #7

NEPCO operates five existing bagging machines that cut and seal polyethylene film into finished bags, with Bagging Machines #6 and #7 running in parallel to the existing machines. This process creates smoke at times, which is vented off the machines. It was concluded in Air Emission License A-894-71-C-R (11/1/13) that the quantity of VOC in smoke coming from the bagging machines was undeterminable and considered de minimis. In January of 2006, NEPCO installed Smog Hogs (manufactured by United Air Specialists) which filter and clean smoke electrostatically. These units electrically charge even microscopic contaminants and then capture them in electrostatic precipitator (ESP) collection cells. NEPCO eliminated the prior rooftop stacks that vented emissions from the bagging machines and now vent the bagging machines inside the building through the Smog Hogs. Bagging Machines #6 and #7 will also vent through the Smog Hogs into the building's interior.

C. Annual Emissions

This license amendment does not change the facility's licensed annual emissions.

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by case basis. In accordance with 06-096 C.M.R. ch. 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM ₁₀	25
SO ₂	50
NO _x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license amendment.

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-894-71-E-M subject to the conditions found in Air Emission License A-894-71-C-R and in amendment A-894-71-D-A.

Severability. The invalidity or unenforceability of any provision of this License Amendment or part thereof 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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SPECIFIC CONDITIONS

The following is a new condition of Air Emission License A-894-71-C-R dated 11/1/13.

- (31) Bagging Machines #6 and #7 shall be vented to electrostatic precipitators to minimize smoke emissions whenever they are operating. [06-096 C.M.R. ch. 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 1st DAY OF OCTOBER, 2020.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, ACTING COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-894-71-C-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 8/7/20

Date of application acceptance: 8/10/20

Date filed with the Board of Environmental Protection:

This Order prepared by Chris Ham, Bureau of Air Quality.

