

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

#### **DEPARTMENT ORDER**

Standard Biocarbon Corporation Penobscot County Enfield, Maine A-1158-71-D-M Departmental
Findings of Fact and Order
Air Emission License
Amendment #3

#### 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

Standard Biocarbon Corporation (SBC) was issued Air Emission License A-1158-71-A-N on November 12, 2021, for the construction and operation of emission sources associated with their biocarbon (also called biochar) production and distribution facility to be located in East Millinocket. The license was subsequently amended as follows:

Amendment #	<b>Date Issued</b>	Brief Description	
A-1158-71-B-A	10/13/2022	Construct and operate the proposed facility in Enfield,	
		Maine rather than East Millinocket and reduce the	
		number of PYREG units from four to two	
A-115-71-C-A	5/15/2024	Addition of Dryer #1	

The equipment addressed in this license amendment is located at 542 Hammett Road in Enfield, Maine. SBC has requested a minor revision to their license in order to extend the deadline to complete performance testing on Dryer #1.

# B. Emission Equipment

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

## **Process Equipment**

Equipment	Production Rate <sup>a</sup>	Stack #
Dryer #1	2.4 ton/hr green chips 1.5 ODT/hr <sup>b</sup>	2

<sup>&</sup>lt;sup>a</sup> Throughput rate is approximate.

<sup>&</sup>lt;sup>b</sup> ODT/hr = Oven-dried tons per hour, i.e., wood at 20% moisture

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# 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.

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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

The facility is licensed as follows:

- · As a natural minor source of criteria pollutants, because no license restrictions are necessary to 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.

# E. Revision Description

Air Emission License A-1158-71-C-A (issued 5/15/2024) authorized the construction and operation of Dryer #1, an indirect contact dryer used to reduce the moisture content of the wood chips used in biochar production. The license requires SBC to conduct performance testing on Dryer #1 for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC within 180 days of startup and upon request by the Department thereafter. Testing must be conducted under normal representative operating conditions. Dryer #1 started up on September 30, 2024, resulting in a testing deadline of March 29, 2025.

Dryer #1 feeds the PYREG units, which have experienced significant unplanned downtime due to frequent syngas filter fouling coupled with a lack of orders for biochar. As a result, Dryer #1 has only operated for 69 hours as of February 7, 2025, and has rarely operated at what the facility considers normal representative operating conditions for extended periods of time. Therefore, SBC has requested an extension to the deadline to conduct performance testing and has proposed a new deadline of within 750 hours of operation from startup.

The Department agrees that, due to SBC's limited experience with operating Dryer #1, performance testing at this time would not be representative or useful. The Department also does not intend for SBC to start up Dryer #1 solely for the purposes of conducting a performance test and finds the proposed deadline to be acceptable. SBC shall conduct performance testing on Dryer #1 within 750 hours of operation from startup of the unit. SBC shall maintain records of all operating hours for Dryer #1.

## F. Annual Emissions

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

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## **ORDER**

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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-1158-71-D-M subject to the conditions found in Air Emission License A-1158-71-A-N, in amendments A-1158-71-B-A and A-1158-71-C-A, and the following conditions.

<u>Severability</u>. 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.

# **SPECIFIC CONDITIONS**

The following shall replace Condition (21)(H)(1) of Air Emission License A-1158-71-C-A:

# (21) **Dryer #1**

- H. Performance Testing [06-096 C.M.R. ch. 115, BACT]
  - 1. SBC shall conduct performance testing for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC within 750 hours of operation from startup of Dryer #1 and upon Department request thereafter. Compliance shall be demonstrated by records of all unit operating hours.

Done and dated in augusta, maine this  $14^{th}$  day of MARCH, 2025.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: for MELANIE LOYZIM, COMMISSIONER

The term of this license amendment shall be ten (10) years from the issuance of Air Emission License A-1158-71-A-N (issued 11/12/2021).

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 2/11/2025

Date of application acceptance: 2/11/2025

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