



DEPARTMENT ORDER

**Huber Engineered Woods LLC
Aroostook County
Easton, Maine
A-62-77-7-M**

**Departmental
Findings of Fact and Order
New Source Review
NSR #7**

FINDINGS OF FACT

After review of the air emission license minor revision 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 (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Huber Engineered Woods LLC
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Revision
NAICS CODES	321219
NATURE OF BUSINESS	Oriented Strand Board Manufacturer (OSB)
FACILITY LOCATION	33 Station Road, Easton

B. NSR License Description

Huber Engineered Woods LLC (Huber) has requested a New Source Review (NSR) license to establish water-based ink as the only applied ink used in the Ink Jet Printer and to replace an existing baghouse with a new baghouse. This baghouse is used to remove particulate matter from the exhaust collected from the Sander system, part of the Dust Handling Systems.

Huber also requested the limit of VOC emissions and record keeping requirements of ink usage for the Ink Jet Printer process be removed, since they now only use water-based inks with no VOC content.

C. Application Classification

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

The application submitted by Huber does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements.

The proposed revision will not change the facility's emission limits and will not result in an emissions increase of greater than 4 tons/year of a single pollutant or 8 tons/year total pollutants, both excluding greenhouse gases. Therefore, the NSR license is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 Code of Maine Rules (C.M.R.) ch. 115. The procedures found in 06-096 C.M.R. ch. 115 can be utilized to process this application since the proposed revision not prohibited by the Part 70 air emission license. An application to incorporate the requirements of this NSR license into the Part 70 air emission license has been submitted to the Department.

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 as well as for those sources located in designated non-attainment areas.

Section 2.R. of 06-096 C.M.R. ch. 115 states, "If a licensee is proposing to replace an existing air pollution control system or replacement of burner systems, the applicant must demonstrate to the Department that the new system will achieve BPT."

B. Sander Baghouse Replacement

1. Project Description

Huber currently operates the Sander Baghouse which controls PM emissions as part of the Dust Handling System. The previous baghouse was installed in 2004 and although still operational, it was approaching the end of its useful life. In 2020, Huber replaced the MacDonald baghouse with a 12-foot-long Rodrigue Metal Limited baghouse.

The new baghouse utilizes the same ductwork, fan, and framework as the replaced unit, with the same volumetric flow and discharge location. The new baghouse utilizes filters that will maintain PM emissions to less than 1 tpy. The new fire protection includes automatic and manual deluge, heat detection, backdraft damper, explosion doors, and a thermally linked exhaust fire damper, while the high-speed abort gate and GreCon fire detection eyes will remain in the existing ductwork.

2. Regulatory Requirements

In order to minimize fugitive emissions, Huber will continue to follow a written, Best Management Practices (BMP) plan for all plant dust handling and control systems as described in Huber's license A-62-70-F-R/A (8/28/2013).

The most effective control technique for particulate matter from the pneumatic transfer operation described in A-62-70-F-R/A (08/28/2013) is baghouse control. Baghouse technology is considered BPT for this application with annual particulate emissions expected to be less than 1 tpy from the baghouse.

3. Department Determination

The Department agrees that baghouse technology and the BMP plan for dust handling and control systems represents BPT for this application.

C. Water-based Ink in the Ink Jet Printer

Huber currently operates the Ink Jet Printer to label material before storage. The ink historically used in the Ink Jet Printer contained 7 pounds of VOC per gallon. Huber had a limit of 20.7 tons per year of VOC emissions from the Ink Jet Printer. The facility now uses water-based ink containing no VOC, and annual emissions have dropped to zero for the last several reporting years. Therefore, an annual emission limit is no longer required, nor are the record keeping requirements necessary for the Ink Jet Printer process.

Based on lack of VOC emissions from the Ink Jet Printer process, Condition 22 from NSR License A-62-77-2-A (06/13/2007) will be removed.

D. Incorporation Into the Part 70 Air Emission License

Pursuant to *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140 § 1(C)(8), for a modification at the facility that has undergone NSR requirements or been processed through 06-096 C.M.R. ch. 115, the source must apply for an amendment to their Part 70 license within one year of commencing the proposed operations, as provided in 40 C.F.R. Part 70. An application to incorporate the requirements of this NSR license into the Part 70 air emission license has been submitted to the Department.

E. Annual Emissions

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

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ORDER

The Department hereby grants New Source Review Minor Revision A-62-77-7-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and approves the installation and operation of the replacement baghouse.

Condition (22) of Air Emission License A-62-77-2-A is deleted.

DONE AND DATED IN AUGUSTA, MAINE THIS 4th DAY OF FEBRUARY, 2026.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 14, 2020, supplemented on December 29, 2025

Date of application acceptance: August 14, 2020

This Order prepared by Zac Hicks, Bureau of Air Quality.