



DEPARTMENT ORDER

**Hardwood Products Company LLC
Piscataquis County
Guilford, Maine
A-328-71-M-M**

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

I. REGISTRATION

A. Introduction

Hardwood Products Company LLC (HPC) was issued Air Emission License A-328-71-L-R on June 7, 2019, for the operation of emission sources associated with their wood products manufacturing facility.

The equipment addressed in this license amendment is located at 31 School Street, Guilford, Maine.

HPC has requested a minor revision to their license in order to remove the Package Boiler and update 06-096 C.M.R. ch. 101 requirements.

B. Emission Equipment

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

Boiler

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.	Stack #
<i>Package Boiler</i> ¹	<i>2.8</i>	<i>19.8 gal/hr</i>	<i>Distillate Fuel</i>	<i>1985</i>	<i>1985</i>	<i>2</i>

¹ Removed from license

The following equipment is addressed in this air emission license amendment only for the purpose of updating *Visible Emission Regulation*, C.M.R. ch. 101:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Boiler #1	13.9	3,170 lb/hr ¹	Biomass	1913	1913	1
Boiler #2	13.9	3,170 lb/hr ¹	Biomass	1937	1937	1

¹ Assumes biomass with a 33 % moisture content having a heating value of 6,030 Btu/lb

Process Equipment

Equipment	Pollution Control Equipment	Stack #
Pneumatic Conveyors (6)	Cyclones	4-9

C. Definitions

Biomass means any biomass-based solid fuel that is not a solid waste. This includes, but is not limited to, wood residue and wood products (e.g., trees, tree stumps, tree limbs, bark, lumber, sawdust, sander dust, chips, scraps, slabs, millings, and shavings). This definition also includes wood chips and processed pellets made from wood or other forest residues. Inclusion in this definition does not constitute a determination that the material is not considered a solid waste. HPC should consult with the Department before adding any new biomass type to its fuel mix.

Records or *Logs* mean either hardcopy or electronic records.

D. 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.

E. 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.

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 was established in Air Emission License A-328-71-L-R (June 7, 2019). A BPT analysis is not required for this requested license change because no modifications to the facility will be made and no increases in emissions will result.

B. Package Boiler

In 2022, HPC separated from Puritan Medical Products, an affiliated company on adjoining property. The Package Boiler is the only licensed equipment that is part of the Puritan Medical Products property. HPC had previously added the Package Boiler to their Air Emission License as part of A-325-71-H-M/R on April 30, 2001. As there is no plan for the two entities to rejoin, HPC has requested the Package Boiler be removed from their license to allow them to stop reporting annual emissions for this unit after emissions reporting for calendar year 2025 have been submitted.

C. C.M.R. Chapter Updates and Clarifications

Requirements in this license have been updated to include the current requirements for Boilers #1 and #2, process equipment, and fugitive emissions based on *Visible Emissions Regulation*, 06-096 C.M.R. ch. 101 and to clarify the requirements of *Emission Statements*, 06-096 C.M.R. ch. 137. Specific Conditions have been updated to reflect current rules.

1. Boilers #1 and #2

Visible emissions from Stack #1, comprised of the combined emissions from Boilers #1 and #2, shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time HPC shall either meet the normal operating visible emissions standard or the following alternative visible emissions standard.

During periods of startup, shutdown, or malfunction of either Boiler #1 or Boiler #2, combined visible emissions shall not exceed 40% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive six-minute block averages) per event. If this alternative visible emissions standard is utilized, HPC shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.

2. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis.

3. Fugitive Emissions

HPC shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.

HPC shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22.

4. Emission Statements

HPC is subject to emissions inventory requirements contained in *Emission Statements*, 06-096 C.M.R. ch. 137. HPC shall maintain the following records in order to comply with this rule:

- a. The hours of operation for Boilers #1 and #2 each, on an annual basis; and
- b. Calculations of the VOC and/or HAP emissions from the Parts Washers on a calendar year total basis.

Because the moisture content of the biomass fired in Boilers #1 and #2 is not tracked by the facility, HPC shall calculate their PM and NO_x emissions for their annual emission statement using the following formulas:

Formulas for Boilers #1 and #2 only

$$PM \text{ emissions} = \text{Boiler Operation Hours} \times \frac{0.551 \text{ lb}}{MMBtu} \times \frac{13.9 \text{ MMBtu}}{hr} \times \frac{\text{Ton}}{2000 \text{ lb}}$$

$$NO_x \text{ emissions} = \text{Boiler Operation Hours} \times \frac{0.49 \text{ lb}}{MMBtu} \times \frac{13.9 \text{ MMBtu}}{hr} \times \frac{\text{Ton}}{2000 \text{ lb}}$$

The PM formula assumes that Boilers #1 and #2 are operating at 100% capacity and utilizes an emissions factor from 06-096 C.M.R. ch. 103(2)(A)(3)(a) that does not consider the moisture content of the fuel.

The NO_x formula also assumes that Boilers #1 and #2 are operating at 100% capacity and uses an emission factor from AP-42 Table 1.6-2 that assumes the higher of the two available emission factors for wood residue combustion.

Every third year, or as requested by the Department, HPC shall report to the Department emissions of hazardous air pollutants as required pursuant to 06-096 C.M.R. ch. 137, § (3)(C). The next report is due no later than May 15, 2027, for emissions occurring in calendar year 2026. The Department will use these reports to calculate and invoice for the applicable annual air quality surcharge for the subsequent three billing periods. HPC shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3).
[38 M.R.S. § 353-A(1-A)]

D. Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility's annual air license fee and establishing the facility's potential to emit (PTE). Only licensed equipment is included, i.e., emissions from insignificant activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included except when required by state or federal regulations. Maximum potential emissions were calculated based on 8,760 hours per year of operation, with no fuel limit on Boilers #1 and #2.

This information does not represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	CO	VOC
Boilers #1 and #2	67.1	67.1	67.1	3.0	59.7	73.1	2.1
Total TPY	67.1	67.1	67.1	3.0	59.7	73.1	2.1

Pollutant	Tons/year
Single HAP	7.9
Total HAP	19.9

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
PM _{2.5}	15
SO ₂	50
NO _x	50
CO	250

HPC previously submitted an ambient air quality impact analysis outlined in air emission license A-328-71-H-M/R (dated April 30, 2001) demonstrating that emissions from the facility, in conjunction with all other sources, do not violate Ambient Air Quality Standards (AAQS). An additional air quality impact analysis is not required for 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-328-71-M-M subject to the conditions found in Air Emission License A-328-71-L-R and the following conditions.

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.

SPECIFIC CONDITIONS

Condition (17) of Air Emission License A-328-71-L-R is deleted.

The following shall replace Conditions (16)(F), (18), (20), and (21) of Air Emission License A-328-71-L-R:

(16) **Boilers #1 and #2**

F. Visible Emissions

Visible emissions from Stack #1, comprised of the combined emissions from Boilers #1 and #2, shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time HPC shall either meet the normal operating visible emissions standard or the following alternative visible emissions standard.

During periods of startup, shutdown, or malfunction of either Boiler #1 or Boiler #2, combined visible emissions shall not exceed 40% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive six-minute block averages) per event. If this alternative visible emissions standard is utilized, HPC shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.

[06-096 C.M.R. ch. 101, § 4(A)(5)(a) and § 4(D)(1)]

(18) **General Process Sources**

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

(20) **Fugitive Emissions** [06-096 C.M.R. ch. 101, § 4(C)]

- A. HPC shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.
- B. HPC shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22.

(21) **Annual Emission Statements**

- A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, HPC shall annually report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory. The emission statement shall be submitted as specified by the date in 06-096 C.M.R. ch. 137.
- B. HPC shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:
1. The hours of operation for Boilers #1 and #2 each, on an annual basis; and
 2. Calculations of the VOC and/or HAP emissions from the Parts Washers on a calendar year total basis.
[06-096 C.M.R. ch. 137]
- C. Every third year, or as requested by the Department, HPC shall report to the Department emissions of hazardous air pollutants as required pursuant to 06-096 C.M.R. ch. 137, § (3)(C). The next report is due no later than May 15, 2027, for emissions occurring in calendar year 2026. HPC shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3).
[38 M.R.S. § 353-A(1-A)]

DONE AND DATED IN AUGUSTA, MAINE THIS 13th DAY OF MAY, 2026.

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-328-71-L-R (issued 06/07/2019).

[Note: If a renewal application, determined as complete by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 M.R.S. § 10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: February 10, 2026

Date of application acceptance: February 11, 2026

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