



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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**State of Maine  
Maine Military Authority  
Aroostook County  
Limestone, Maine  
A-844-71-G-R/A (SM)**

**Departmental  
Findings of Fact and Order  
Air Emission License  
Renewal with Amendment**

**FINDINGS OF FACT**

After review of the air emission license renewal with 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**

The State of Maine, Maine Military Authority d/b/a Maine Readiness Sustainment and Maintenance Site (MMA) has applied to renew their Air Emission License permitting the operation of emission sources associated with their automotive refurbishment center.

MMA has requested an amendment to their license in order to remove equipment which has been turned back over to the Loring Development Authority, remove equipment which has been removed from the site, and add heaters associated with the paint booths.

The equipment addressed in this license is located at 89 Kansas Rd, Limestone, Maine.

**B. Emission Equipment**

The following equipment is addressed in this air emission license:

**Boilers**

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Date of Manuf.</u>	<u>Stack #</u>
7220B	6.7	47.9	distillate fuel, 0.5%	1973	13
7230B	5.7	40.5	distillate fuel, 0.5%	2011	1

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RAY BLDG., HOSPITAL ST.

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312 CANCO ROAD  
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PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769  
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**Paint Booth Heaters**

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Date of Manuf.</u>
PB Heater 1	6.6	72.5	propane, negligible	2012
PB Heater 2	6.6	72.5	propane, negligible	2012
PB Heater 3	3.2	35.0	propane, negligible	2012

The paint booth heaters are new to this air emission license.

**Process Equipment**

<u>Equipment</u>	<u>Production Rate</u>	<u>Pollution Control Equipment</u>
Paint Booth 7230PB1	11 gal/hr	fabric filters
Paint Booth 7230PB2	11 gal/hr	fabric filters
Paint Booth 7230PB3	5.5 gal/hr	fabric filters
Blast Booth 7230BB1	9.5 lb media/hr	multiclone
Blast Booth 7230BB2	9.5 lb media/hr	multiclone
Paint Booth Gun Cleaners (2)	N/A	recycling system

The buildings associated with the following boilers have been turned back over to the Loring Development Authority and are no longer covered by this air emission license: 7500B, 7501B1, 7501B2, 8260B, 8712B, 8713B1, 8713B2, and 8716B.

Generator #1 was turned back over to the Loring Development Authority with Building 8713 and is no longer covered by this air emission license.

The previously licensed paint gun cleaners have been removed and replaced with automatic spray gun cleaners and a closed-loop recycling system.

**C. Definitions**

*Distillate Fuel* means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396, diesel fuel oil numbers 1 or 2, as defined in ASTM D975, kerosene, as defined in ASTM D3699, biodiesel as defined in ASTM D6751, or biodiesel blends as defined in ASTM D7467.

D. Application Classification

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the “Significant Emission” levels as defined in the Department’s *Definitions Regulation*, 06-096 CMR 100 (as amended). The emission increases are determined by subtracting the current licensed annual emissions preceding the modification from the maximum future licensed annual emissions, as follows:

<u>Pollutant</u>	<u>Current License (TPY)</u>	<u>Future License (TPY)</u>	<u>Net Change (TPY)</u>	<u>Significant Emission Levels</u>
PM	8.0	8.1	+0.1	100
PM <sub>10</sub>	8.0	8.1	+0.1	100
SO <sub>2</sub>	49.4	27.3	-22.1	100
NO <sub>x</sub>	41.6	18.0	-23.6	100
CO	4.0	8.0	+4.0	100
VOC	27.4	28.0	+0.6	50

This modification is determined to be a renewal with a minor modification and has been processed as such.

With the licensed limits associated with the surface coating operations, the facility is licensed below the major source thresholds for criteria pollutants and is considered a synthetic minor. With the licensed limits associated with the surface coating operations, the facility is licensed below the major source thresholds for hazardous air pollutants (HAP) and is considered an area source of 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 CMR 100 (as amended). 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 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

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. Boilers

MMA operates two boilers that are above the licensing threshold of 06-096 CMR 115. Boiler 7220B is rated at 6.7 MMBtu/hr, and Boiler 7230B is rated at 5.7 MMBtu/hr. Both fire distillate fuel.

1. BPT Findings

The BPT emission limits for the boilers were based on the following:

- PM/PM<sub>10</sub> – 0.08 lb/MMBtu based on 06-096 CMR 115, BPT
- SO<sub>2</sub> – based on firing distillate fuel with a maximum sulfur content of 0.5% by weight
- NO<sub>x</sub> – 20 lb/1000 gal based on AP-42, Table 1.3-1, dated 5/10
- CO – 5 lb/1000 gal based on AP-42, Table 1.3-1, dated 5/10
- VOC – 0.34 lb/1000 gal based on AP-42, Table 1.3-3, dated 5/10
- Opacity – 06-096 CMR 101

The BPT emission limits for the boilers are the following:

<u>Unit</u>	<u>Pollutant</u>	<u>lb/MMBtu</u>
7220B	PM	0.08
7230B	PM	0.08

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM<sub>10</sub> (lb/hr)</u>	<u>SO<sub>2</sub> (lb/hr)</u>	<u>NO<sub>x</sub> (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
7220B	0.54	0.54	3.37	0.96	0.24	0.02
7230B	0.45	0.45	2.86	0.81	0.20	0.01

Visible emissions from the boilers shall each not exceed 20% opacity on a 6 minute block average, except for no more than one (1) six (6) minute block average in a 3 hour period.

Prior to July 1, 2016, or by the date otherwise stated in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired at the facility shall have a maximum sulfur content of 0.5% by weight. Per 38 M.R.S.A. §603-A(2)(A)(3), beginning July 1, 2016, or on

the date specified in the statute, distillate fuel fired at the facility shall have a maximum sulfur content of 0.005% by weight (50 ppm), and beginning January 1, 2018, or on the date specified in the statute, distillate fuel fired at the facility shall have a maximum sulfur content of 0.0015% by weight (15 ppm). The specific dates and requirements contained in this paragraph reflect the current dates and requirements in the statute as of the effective date of this license; however, if the statute is revised, the facility shall comply with the revised dates and requirements upon promulgation of the statute revision.

2. 40 CFR Part 60, Subpart Dc

Due to their size, neither boiler is subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989.

3. 40 CFR Part 63, Subpart JJJJJ

Boilers 7220B and 7230B are subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ). The units are considered existing oil-fired boilers rated less than 10 MMBtu/hr.

A summary of the currently applicable federal 40 CFR Part 63 Subpart JJJJJ requirements is listed below. At this time, the Department has not taken delegation of this area source MACT (Maximum Achievable Control Technology) rule promulgated by EPA, however MMA is still subject to the requirements. Notification forms and additional rule information can be found on the following website:  
<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

a. Compliance Dates, Notifications, and Work Practice Requirements

i. Initial Notification of Compliance

An Initial Notification submittal to EPA was due no later than January 20, 2014. [40 CFR Part 63.11225(a)(2)]

ii. Boiler Tune-Up Program

(a) A boiler tune-up program shall be implemented. [40 CFR Part 63.11223]

- (b) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

<b>Boiler Category</b>	<b>Tune-Up Frequency</b>
Existing Oil fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below	Every 2 years
<i><b>Boilers with less frequent tune up requirements</b></i>	
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

- (c) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(1)]
2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the

adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]

6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR Part 63.11223(b)(7)]

(d) Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:

1. The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
2. A description of any corrective actions taken as part of the tune-up of the boiler; and
3. The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

[40 CFR §63.11223(b)(6)]

(e) After conducting the initial boiler tune-up, a Notification of Compliance Status was to be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]

iii. Compliance Report:

A compliance report shall be prepared by March 1<sup>st</sup> biennially or every five years (depending on the tune-up schedule) which covers the previous two (or five) calendar years. The report shall be maintained by the source and submitted to the Department and to the EPA upon request. The report must include the items contained in §63.11225(b)(1) and (2), including the following: [40 CFR §63.11225(b)]

- (a) Company name and address;
- (b) A statement of whether the source has complied with all the relevant requirements of this Subpart;
- (c) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;

(d) The following certifications, as applicable:

1. "This facility complies with the requirements in 40 CFR §63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
2. "No secondary materials that are solid waste were combusted in any affected unit."
3. "This facility complies with the requirement in 40 CFR §§63.11214(d) to conduct a tune-up of each applicable boiler according to 40 CFR §63.11223(b)."

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 CFR Part 63, Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]:

- i. Copies of notifications and reports with supporting compliance documentation;
- ii. Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
- iii. Records of the occurrence and duration of each malfunction of each applicable boiler; and
- iv. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [63.1125(a)(4)(vi)]

C. Paint Booth Heaters

MMA operates three propane-fired heaters on their associated paint booths. PB Heater 1 and PB Heater 2 are rated at 6.6 MMBtu/hr. PB Heater 3 is rated at 3.2 MMBtu/hr. All three were installed in 2012 and are new to this license.

1. BACT Findings

The BACT emission limits for the paint booth heaters were based on the following:

PM/PM <sub>10</sub>	–	0.05 lb/MMBtu based on 06-096 CMR 115, BACT
SO <sub>2</sub>	–	0.018 lb/1000 gal based on AP-42 Table 1.5-1, dated 7/08
NO <sub>x</sub>	–	13 lb/1000 gal based on AP-42 Table 1.5-1, dated 7/08
CO	–	7.5 lb/1000 gal based on AP-42 Table 1.5-1, dated 7/08
VOC	–	1.0 lb/1000 gal based on AP-42 Table 1.5-1, dated 7/08
Opacity	–	06-096 CMR 101



The BACT emission limits for the paint booth heaters are the following:

<u>Unit</u>	<u>Pollutant</u>	<u>lb/MMBtu</u>
PB Heater 1	PM	0.05
PB Heater 2	PM	0.05
PB Heater 3	PM	0.05

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM<sub>10</sub> (lb/hr)</u>	<u>SO<sub>2</sub> (lb/hr)</u>	<u>NO<sub>x</sub> (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
PB Heater 1	0.33	0.33	neg	0.94	0.54	0.07
PB Heater 2	0.33	0.33	neg	0.94	0.54	0.07
PB Heater 3	0.16	0.16	neg	0.46	0.26	0.04

Visible emissions from the paint booth heaters shall each not exceed 10% opacity on a 6 minute block average, except for no more than one (1) six (6) minute block average in a 3 hour period.

2. 40 CFR Part 60, Subpart Dc

The paint booth heaters do not heat water. They do not meet the definition of “steam generating unit” and therefore are not subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989.

3. 40 CFR Part 63, Subpart JJJJJ

The paint booth heaters do not heat water. They do not meet the definition of a “boiler” and therefore are not subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ).

D. Surface Preparation – Blast Booths

MMA operates two blast booths, 7230BB1 and 7230BB2, which are controlled by multiclones.

Visible emissions from each of the blast booth exhausts shall not exceed an opacity of 10% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period.

Records shall be kept documenting maintenance on the blast booths. Periodic monitoring for the blast booths shall include inspections of the multiclones (at least once per month), and documenting the inspections in a maintenance log. The maintenance log shall contain information on maintenance, multiclone failures, and corrective action.

E. Surface Coating Operations

MMA operates three paint booths, 7230PB1, 7230PB2, and 7230PB3. The previously licensed paint booth 7230PB4 was assembled, but never installed. MMA has stated they currently do not have any plans to use it.

MMA does repair and refinish work which is exempt from the requirements of *Surface Coating Facilities*, 06-096 CMR 129 per Section (1)(E)(3).

BPT for the paint booths is the utilization of HVLP (high volume, low pressure) spray guns as well as fabric filters. MMA shall be limited to 25.0 tons/year of VOC and 9.9 tons/year of total HAPS (hazardous air pollutants) from the surface coating operations, based on a 12 month rolling total.

Visible emissions from each of the paint booth's exhaust shall not exceed an opacity of 10% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period.

Records shall be kept documenting maintenance on the paint booths. Periodic monitoring for the paint booths shall include inspections of the fabric filters (at least once per month), and documenting the inspections in a maintenance log. The maintenance log shall contain information on maintenance, fabric filter failures, and corrective action.

MMA shall maintain records to demonstrate compliance with the VOC and HAP emission limits on a monthly and 12 month rolling total based on purchase records and SDS (safety data sheets) for the various materials used in the facility or other means approved by the Department.

F. Paint Gun Cleaners

MMA has replaced their previous paint gun cleaners with two automatic spray gun cleaners and a closed loop solvent recycling system.

The new paint gun cleaners have a closed compartment for automatic cleaning as well as a wash sink, similar to a degreaser or parts washer, for manual cleaning and touchup work. This equipment has been determined to be subject to 06-096 CMR 130, *Solvent Cleaners*.

The solvent recycling system takes waste solvent from the paint gun cleaners and separates the original solvent from the waste materials. During the recycling process, the distillation tank fills with dirty solvent and the heating element heats the mixture. The solvent mixture boils and the vapor passes through a cooling condenser where clean solvent condenses out. The waste materials boil at a temperature substantially higher than the machine set point and remain in the distillation tank for disposal.

Emissions from the paint gun cleaners and solvent recovery units shall not exceed 2.0 ton/year of VOC based on a 12 month rolling total. Each unit shall be equipped with a cover, the covers shall be closed when the units are not in use, the cleaned parts shall be drained for at least fifteen (15) seconds or until the dripping stops, and the cleaners or solvent recovery units shall not be operated with any visible solvent leak until such leak is repaired.

MMA shall keep records of the amount of new solvent added to the process and the VOC content of the solvent. Purchase records kept on a monthly basis and copies of SDS (safety data sheets) may be used to satisfy these recordkeeping requirements.

G. Parts Washers

MMA operates several degreasers which have been switched to an aqueous solution. The solvent degreasers will be subject to *Solvent Cleaners*, 06-096 CMR 130 (last amended June 28, 2004) if solvents containing greater than 5% VOCs by weight are used in the units.

H. General Process Emissions

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period.

I. Annual Emissions

1. Total Annual Emissions

MMA shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits were calculated based on the following:

- Unlimited use of distillate fuel oil in the boilers
- Unlimited use of propane in the paint booth heaters
- Annual VOC emission limits on the surface coating operations and paint gun cleaners
- Facility-wide annual HAP emission limits

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

	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Boiler 7220B	2.4	2.4	14.8	4.2	1.1	0.1
Boiler 7230B	2.0	2.0	12.5	3.6	0.9	0.1
PB Heater 1	1.5	1.5	–	4.1	2.4	0.3
PB Heater 2	1.5	1.5	–	4.1	2.4	0.3
PB Heater 3	0.7	0.7	–	2.0	1.2	0.2
Surface Coating	–	–	–	–	–	25.0
Paint Gun Cleaners	–	–	–	–	–	2.0
<b>Total TPY</b>	<b>8.1</b>	<b>8.1</b>	<b>27.3</b>	<b>18.0</b>	<b>8.0</b>	<b>28.0</b>

Pollutant	Tons/year
Total HAP	9.9

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through ‘Tailoring’ revisions made to EPA’s *Approval and Promulgation of Implementation Plans*, 40 CFR Part 52, Subpart A, §52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO<sub>2</sub>e).

The quantity of CO<sub>2</sub>e emissions from this facility is less than 100,000 tons per year, based on the following:

- the facility’s fuel use;
- worst case emission factors from the following sources: U.S. EPA’s AP-42, the Intergovernmental Panel on Climate Change (IPCC), and 40 CFR Part 98, *Mandatory Greenhouse Gas Reporting*; and
- global warming potentials contained in 40 CFR Part 98.

No additional licensing actions to address GHG emissions are required at this time.

**III. AMBIENT AIR QUALITY ANALYSIS**

The level of ambient air quality impact modeling required for a minor source shall be determined by the Department on a case-by case basis. In accordance with 06-096 CMR 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:

<u>Pollutant</u>	<u>Tons/Year</u>
PM <sub>10</sub>	25
SO <sub>2</sub>	50
NO <sub>x</sub>	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.

### 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 A-844-71-G-R/A subject to the following conditions.

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

### STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S.A. §347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115.  
[06-096 CMR 115]

- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 CMR 115]
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353-A. [06-096 CMR 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
  - A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:

1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
  2. pursuant to any other requirement of this license to perform stack testing.
  - B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
  - C. submit a written report to the Department within thirty (30) days from date of test completion.  
[06-096 CMR 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
  - B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
  - C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.  
[06-096 CMR 115]
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in

an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]

- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

### SPECIFIC CONDITIONS

(16) **Boilers**

A. Fuel

1. Per the current dates and requirements of 38 M.R.S.A. §603-A(2)(A)(3), the facility shall comply with the following statements; however, if the statute is revised, the facility shall comply with the revised dates and requirements upon promulgation of the statute revision.
  - i. Prior to July 1, 2016, or the date specified in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired at the facility shall have a maximum sulfur content of 0.5% by weight. [06-096 CMR 115, BPT]
  - ii. Beginning July 1, 2016, or on the date specified in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired at the facility shall have a maximum sulfur content of 0.005% by weight (50 ppm). [38 M.R.S.A. §603-A(2)(A)(3)]
  - iii. Beginning January 1, 2018, or on the date specified in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired at the facility shall have a maximum sulfur content of 0.0015% by weight (15 ppm). [38 M.R.S.A. §603-A(2)(A)(3)]
2. Compliance shall be demonstrated by fuel records from the supplier showing the quantity, type, and the percent sulfur of the fuel delivered. Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 CMR 115, BPT]

B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
7220B	PM	0.08	06-096 CMR 115, BPT
7230B	PM	0.08	06-096 CMR 115, BPT



C. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
7220B	0.54	0.54	3.37	0.96	0.24	0.02
7230B	0.45	0.45	2.86	0.81	0.20	0.01

D. Visible emissions from 7220B and 7230B shall each not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [06-096 CMR 101]

E. Boiler MACT (40 CFR Part 63, Subpart JJJJJ) Requirements for 7220B and 7230B [incorporated under 06-096 CMR 115, BPT]

1. The facility shall implement a boiler tune-up program. [40 CFR Part 63.11223]

(a) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

Boiler Category	Tune-Up Frequency
Existing Oil fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below	Every 2 years
<b><i>Boilers with less frequent tune up requirements</i></b>	
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

(b) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

(1) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(1)]

- (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
- (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]
- (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
- (5) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]
- (6) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR Part 63.11223(b)(7)]

(c) Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:

- (1) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
- (2) A description of any corrective actions taken as part of the tune-up of the boiler; and
- (3) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

[40 CFR §63.11223(b)(6)]

## 2. Compliance Report

A compliance report shall be prepared by March 1<sup>st</sup> biennially or every five years (depending on the tune-up frequency) which covers the previous two (or five) calendar years. The report shall be maintained by the source and submitted to the Department and to the EPA upon request. The report must include the items contained in §63.11225(b)(1) and (2), including the following:  
[40 CFR §63.11225(b)]

- (a) Company name and address;
  - (b) A statement of whether the source has complied with all the relevant requirements of this Subpart;
  - (c) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
  - (d) The following certifications, as applicable:
    - (1) "This facility complies with the requirements in 40 CFR §63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
    - (2) "No secondary materials that are solid waste were combusted in any affected unit."
    - (3) "This facility complies with the requirement in 40 CFR §§63.11214(d) to conduct a tune-up of each applicable boiler according to 40 CFR §63.11223(b)."
3. Records shall be maintained consistent with the requirements of 40 CFR Part 63, Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]:
- (a) Copies of notifications and reports with supporting compliance documentation;
  - (b) Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
  - (c) Records of the occurrence and duration of each malfunction of each applicable boiler; and
  - (d) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups through their electronic reporting system. [63.1125(a)(4)(vi)]

**(17) Paint Booth Heaters**

- A. The paint booth heaters shall fire propane. MMA shall keep records of the amount of fuel fired in the paint booth heaters on a monthly and 12-month rolling total basis. Compliance shall be demonstrated by fuel records from the supplier showing the quantity and type of fuel delivered. [06-096 CMR 115, BACT]
- B. Emissions shall not exceed the following:

<b>Unit</b>	<b>Pollutant</b>	<b>lb/MMBtu</b>	<b>Origin and Authority</b>
PB Heater 1	PM	0.05	06-096 CMR 115, BACT
PB Heater 2	PM	0.05	06-096 CMR 115, BACT
PB Heater 3	PM	0.05	06-096 CMR 115, BACT

C. Emissions shall not exceed the following [06-096 CMR 115, BACT]:

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
PB Heater 1	0.33	0.33	neg	0.94	0.54	0.07
PB Heater 2	0.33	0.33	neg	0.94	0.54	0.07
PB Heater 3	0.16	0.16	neg	0.46	0.26	0.04

D. Visible emissions from each paint booth heater shall not exceed 10% opacity on a 6 minute block average basis, except for no more than one (1) six (6) minute block average in a 3 hour period. [06-096 CMR 101]

**(18) Surface Preparation – Blast Booths**

- A. MMA shall operate the dust collection devices (multiclones) for the blast booths at all times the corresponding process equipment is in use. [06-096 CMR 115, BPT]
- B. Visible emissions from each of the blast booth exhausts shall not exceed an opacity of 10% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period. [06-096 CMR 115, BPT]
- C. MMA shall inspect the Blast Booth multiclones at least once a month and document the inspections in a maintenance log. The maintenance log shall contain information on maintenance, multiclone failures, and corrective action. [06-096 CMR 115, BPT]

**(19) Surface Coating Operations**

- A. MMA shall use HVLP spray guns and maintain fabric filters on the paint booths. Records shall be kept documenting maintenance on the paint booths. Periodic monitoring for the paint booths shall include inspections of the fabric filters (at least once a month), and documenting the inspections in a maintenance log. The maintenance log shall contain information on maintenance, fabric filter failures, and corrective action. [06-096 CMR 115, BPT]
- B. MMA shall be limited to 25.0 tons/year of VOC from the surface coating operations, based on a 12 month rolling total. Records shall be maintained to demonstrate compliance with the VOC emission limits on a monthly and 12 month rolling total based on purchase records and safety data sheets for the various materials used in the facility, or other means approved by the Department. [06-096 CMR 115, BPT]

- C. Visible emissions from each of the paint booths exhausts shall not exceed an opacity of 10% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period. [06-096 CMR 115, BPT]

(20) **Paint Gun Cleaners and Solvent Recovery**

- A. MMA shall be limited to a total of 2.0 tons/year of VOC from the paint gun cleaners and solvent recovery process, based on a 12 month rolling total. Recordkeeping shall include the amount of new solvent added to each cleaner and the VOC content of the solvent. Records shall be kept on a monthly and 12 month rolling total basis. [06-096 CMR 115, BPT]
- B. Each paint gun cleaner shall be equipped with a cover, the covers shall be closed when the units are not in use, the cleaned parts shall be drained for at least fifteen (15) seconds or until the dripping stops, and the cleaners shall not be operated with any visible solvent leak until such leak is repaired. [06-096 CMR 115, BPT]
- C. The paint gun cleaners are considered cold cleaning machines subject to *Solvent Cleaners*, 06-096 CMR 130. They are therefore subject to the same conditions as the Parts Washers listed in Condition (22) below. [06-096 CMR 130]

(21) **Facility-Wide HAP Limit**

MMA shall not exceed a facility-wide emission limit of 9.9 tons/year of HAP from coatings, paint gun cleaning, and parts washers, based on a 12 month rolling total. Records shall be maintained to demonstrate compliance with the HAP emission limits on a monthly and 12 month rolling total based on a mass balance from purchase records and HAP content from safety data sheets for the various materials used in the facility, or other means approved by the Department. [06-096 CMR 115, BPT]

(22) **Parts Washers**

Parts washers and Paint Gun Cleaners at MMA are subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended).

- A. MMA shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]
- B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 130]:
1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
  2. Wipe cleaning; and,
  3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.

- C. The following standards apply to cold cleaning machines that are applicable sources under Chapter 130.
1. MMA shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
    - (i) Waste solvent shall be collected and stored in closed containers.
    - (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
    - (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
    - (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
    - (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the parts washer.
    - (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
    - (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
    - (viii) Work area fans shall not blow across the opening of the parts washer unit.
    - (ix) The solvent level shall not exceed the fill line.
  2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

**(23) General Process Sources**

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

**(24) Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), the licensee 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 CMR 137.

State of Maine  
Maine Military Authority  
Aroostook County  
Limestone, Maine  
A-844-71-G-R/A (SM)

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Departmental  
Findings of Fact and Order  
Air Emission License  
Renewal with Amendment

- (25) MMA shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 29 DAY OF June, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Patricia W. Aho  
PATRICIA W. AHO, COMMISSIONER

**The term of this license shall be ten (10) years from the signature date above.**

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 6/23/14

Date of application acceptance: 6/24/14

Date filed with the Board of Environmental Protection:

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

