



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**Evonik Cyro LLC
York County
Sanford, Maine
A-393-71-AA-M (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

FINDINGS OF FACT

After review of the air emissions 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 Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

Evonik Cyro LLC (Evonik) was issued Air Emission License A-393-71-V-R/M on May 7, 2013, permitting the operation of emission sources associated with their acrylic plastic resin and sheet products manufacturing facility. Evonik has requested a minor revision to their license to clarify language describing the MFC Thermal Oxidizer and corresponding values monitored and recorded.

The equipment addressed in this license is located at 1796 Main Street, Sanford, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license minor revision:

Fuel Burning Units

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel</u>	<u>Install. Date</u>	<u>Stack #</u>
Thermal Oxidizer	2.5	27.6 gal/hr	Propane	2002	#6
		2451.0 scf/hr	Natural gas		

C. Application Classification

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

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17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143

II. AMENDMENT DESCRIPTION

A. Thermal Oxidizer

Evonik operates a Thermal Oxidizer as a control device for VOC emissions from the Multi-Functional Coating (MFC) Line. The Thermal Oxidizer bed is designed so that vapors flow from the coating line through one "bed" of ceramic media, through the incinerator/combustion chamber, through a second bed of ceramic media, and then to the oxidizer stack for release to the atmosphere of the treated gas flow. The system is designed to frequently alternate the vapor flow between two distinct directional paths, one starting with Bed 1 (to the combustion chamber, to Bed 2, and then to the stack), and the other Starting with Bed 2 (to the combustion chamber, to Bed 1, and then to the stack).

Thermocouples measure the temperature in the combustion chamber. During times when the MFC process is operating, the Thermal Oxidizer display screen shows the "Chamber Average" combustion temperature, displaying compliance with the minimum combustion temperature as required by the license.

In Air Emission License A-393-71-V-R/M (May 7, 2013), language describing this process inappropriately focuses on the media bed temperature instead of the combustion chamber temperature, as was originally specified in the previous air emission license, A-393-71-T-R (June 9, 2003). Evonik has requested their license be modified to correct this inaccuracy and clarify intended requirements. The Department agrees with the appropriateness of this request and has included the clarified requirements in the Specific Conditions of this license amendment.

B. Annual Emissions

Total licensed annual emissions for the facility will not change as a result of this minor license revision.

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-393-71-AA-M subject to the conditions found in Air Emission License A-393-71-V-R/M and the following conditions.

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Severability. The invalidity or unenforceability of any provision of this License 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

This specific condition shall replace Specific Condition (24) B of Air Emission License A-393-71-V-R/M (May 7, 2013). All other parts of this Specific Condition and the other Specific Conditions of the May 2013 license shall remain in effect unless modified through a future licensing action.

(24) Process Emission Sources: Multi-Functional Coating Facility

B. In the Thermal Oxidizer, Evonik shall maintain a minimum chamber average temperature of 1500 °F or the minimum temperature at which the most recently completed stack testing demonstrates a VOC destruction efficiency of at least 98%. Evonik shall use thermocouples in the combustion chamber and associated recording devices to continuously monitor and record the Thermal Oxidizer combustion chamber average temperature to document compliance.

DONE AND DATED IN AUGUSTA, MAINE THIS 18 DAY OF February, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Come for
PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-393-71-V-R/M.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: January 6, 2015

Date of application acceptance: January 6, 2015

Date filed with the Board of Environmental Protection:

This Order prepared by Jane E. Gilbert, Bureau of Air Quality.

