



DEPARTMENT ORDER

**Roehm America LLC
York County
Sanford, Maine
A-393-71-AF-M**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #5**

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

Evonik Cyro LLC was issued Air Emission License A-393-71-V-R/M on May 7, 2013, for the operation of emission sources associated with their acrylic plastic resin and sheet products manufacturing facility. The license was subsequently amended on February 18, 2015 (A-393-71-AA-M), December 8, 2017 (A-393-71-AB-M), January 19, 2021 (A-393-71-AD-M), and April 30, 2021 (A-393-71-AE-M).

In September 2019, Evonik Cyro LLC changed their name to Roehm America LLC (Roehm). This was a change in name only and no license transfer was required.

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

Roehm has requested a minor revision to their license in order to address a chemical transfer process that occurs in their Fabrication and Packaging Department.

B. Revision Description

In Roehm's Fabrication and Packaging Department, chemical products containing methyl methacrylate (MMA) are transferred from six-gallon containers into one-gallon containers. The transfer operation is conducted adjacent to a fume hood which vents outside.

Roehm used EPA's Areal Locations of Hazardous Atmospheres (ALOHA) software to estimate the emission rate of MMA from the transfer process. ALOHA is used to estimate vapor releases associated with spills of hazardous materials. The MMA emission rate was conservatively estimated by assuming the products were 100% MMA and that the entire six gallons to be transferred was spilled and left for a period of time of over one hour. Based on these assumptions, the calculated emission rate is 0.23% by weight.

The transfer of six gallons of MMA takes approximately one hour. Assuming transfer operations operated 8,760 hours/year at six gal/hr with an evaporation rate of 0.23% of a product with a density of 7.8 lb/gal, the potential to emit (PTE) for this process is less than 0.5 tpy. This PTE grossly overestimates emissions, since Roehm estimates that the transfer operation would operate, at most, for up to 15 hours per week per shift.

The insignificance threshold of MMA is 2,000 lb/year (1.0 tpy) pursuant to 06-096 C.M.R. ch. 115, Appendix B, § C.150. Therefore, the chemical transfer process for MMA described in this license is considered an insignificant activity which is not required to be included in the facility's air emission license. It is described here for informational purposes only.

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.

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

With the facility-wide annual emission limits on VOC and HAP, the facility is licensed as follows:

- As a synthetic minor source of air emissions for VOC, because Roehm is subject to license restrictions that 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. Annual Emissions

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

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.

Roehm America LLC
York County
Sanford, Maine
A-393-71-AF-M

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The Department hereby grants Air Emission License Amendment A-393-71-AF-M subject to the conditions found in Air Emission License A-393-71-V-R/M, in amendments A-393-71-AA-M, A-393-71-AB-M, A-393-71-AD-M, and A-393-71-AE-M, 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.

DONE AND DATED IN AUGUSTA, MAINE THIS 7th DAY OF SEPTEMBER, 2022.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, 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: 8/16/2022

Date of application acceptance: 8/16/2022

Date filed with the Board of Environmental Protection:

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

FILED
SEP 07, 2022
State of Maine
Board of Environmental Protection