STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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DEPARTMENT ORDER

The Talaria Company, LLC **d/b/a The Hinckley Company, LLC** **Hancock County** **Southwest Harbor, Maine** **A-754-71-F-R/A**	**Departmental** **Findings of Fact and Order** **Air Emission License** **Renewal / Minor Modification**

FINDINGS OF FACT

After review of the air emission license Renewal 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

The Talaria Company, LLC d/b/a The Hinckley Company, LLC (Hinckley) has applied to renew their Air Emission License for the operation of emission sources associated with its boatyard. Hinckley has also requested an amendment to its license in order to remove Boilers #3, #4, and #5, to remove fuel use limits, to remove yacht manufacturing processes, and to include parts washers.

The equipment addressed in this license is located at 130 Shore Road, Southwest Harbor, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Fuel Type, % sulfur	Maximum Firing Rate (gal/hr)	Date of Manuf.	Date of Install.	Stack #
Boiler #1 (Main Building)	1.9	Distillate Fuel, 0.5% by weight	13.6	Pre-1994	1994	1
Boiler #2 (Main Building)	1.9	Distillate Fuel, 0.5% by weight	13.6	Pre-1994	1994	2
Make-up Air Heater #1 (Old Production Spray Booth)	2.5	LPG, Negligible Sulfur	27.3	2002	2002	N/A
Make-up Air Heater #2 (Old Production Spray Booth)	2.5	LPG, Negligible Sulfur	27.3	2002	2002	N/A

Equipment	Max. Capacity (MMBtu/hr)	Fuel Type, % sulfur	Maximum Firing Rate (gal/hr)	Date of Manuf.	Date of Install.	Stack #
Make-up Air Heater #3 (Service Spray Booth)	1.2	LPG, Negligible Sulfur	14.4	2002	2002	N/A
Boiler #6 (Bradford Shed)*	0.30	LPG, Negligible Sulfur	3.3	2015	2015	--
Boiler #7 (50 Shed)*	0.20	LPG, Negligible Sulfur	2.2	2014	2014	--
Boiler #8 (50 Shed)*	0.20	LPG, Negligible Sulfur	2.2	2014	2014	--
Boiler #9 (64 Building)*	0.50	Distillate Fuel, 0.5% by weight	3.7	2017	2017	--
Boiler #10 (64 Building)*	0.50	Distillate Fuel, 0.5% by weight	3.7	2017	2017	--
Boiler #11 (Old Fiberglass Building)*	0.64	Distillate Fuel, 0.5% by weight	4.7	2017	2018	--

* Boilers #6-11 are all below the minimum licensing threshold for external combustion sources and have only been provided for completeness. They will not be mentioned further in this license.

Generators

Equipment	Max. Input Capacity (MMBtu/hr)	Fuel Type, % sulfur	Date of Manuf.	Date of Install.	Stack #
Generator #1	< 0.5	LPG, Negl. Sulfur	1947	1947	N/A

The size of Generator #1 is unknown, but upon inspection of the unit, due to its small size, it was determined to be below the minimum licensing threshold for internal combustion engines. The generator is subject to *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 C.F.R. Part 63, Subpart ZZZZ; however, because of its size, it will not be addressed further in this license and has only been included for completeness.

Process Emission Sources

Process	Types of Equipment	Pollution Control Methods
Repair and Maintenance Activities	Job Shop	Cyclones Dust Collection System
Surface Coating Operations	Spray Guns, Rollers, Brushes	Building Ventilation

C. Definitions

Distillate Fuel. For the purposes of this license, *distillate fuel* means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) 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.

Liquefied Petroleum Gas (LPG) is defined for the purposes of this license as, Ethane, ethylene, propane, propylene, normal butane, butylene, and isobutene produced at refineries or natural gas processing plants, including plants that fractionate new natural gas. [EPA guidance and AP-42 Chapter 1, Section 5]

D. 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 for Hinckley includes licensing of increased emissions due to the removal of fuel limits, the removal of Boiler #4 from the license, and the inclusion of parts washers. The license is therefore considered to be a renewal of currently licensed emission units and an amendment and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115.

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 Code of Maine Rules (C.M.R.) ch. 100. The emission increases are determined by subtracting the current licensed annual emissions preceding the modification from the maximum future licensed annual emissions, as follows:

Pollutant	Current License (TPY)	Future License (TPY)	Net Change (TPY)	Significant Emission Levels
PM	1.7	0.5	- 1.2	100
PM_{10}	1.7	0.5	- 1.2	100
SO_2	3.9	8.9	+ 5.0	100
NO_x	5.0	6.4	+ 1.4	100
CO	0.6	2.9	+ 2.3	100
VOC	35.0	35.0	--	50

The decrease in PM and PM_{10} limits are a result of the adjustment of emission factors for Hinckley's fuel burning equipment to be more consistent with current licensing practices. This normalization in emission factors also results in a larger increase in SO_2, NO_x, and CO than would have been caused by the removal of fuel limits had the old emission factors been maintained.

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

E. Facility Classification

With the volatile organic compound (VOC) and hazardous air pollutant (HAP) limits associated with the composite fabrication and coating operations, the facility is licensed as follows:

- As a synthetic minor source of air emissions, because the licensed emissions are below the 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.

Emissions of HAP are licensed above 80% of the major source threshold. Therefore, this facility is classified as an "80% Synthetic Minor" for the purpose of determining the minimum required compliance inspection frequency in accordance with Maine's Compliance Monitoring Strategy.

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 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. Process Description

Hinckley is located in Southwest Harbor, Maine. Hinckley's primary activities include the operation of a full-service boatyard providing maintenance, repair and boat storage. No boat manufacturing is conducted at this facility.

In this license, Hinckley's activities are divided into the following areas: Repair and Maintenance Activities and Surface Coating Operations.

Repair and Maintenance Activities (Grinding, Sanding, Buffing, & Welding)
Grinding, sanding, machining, and buffing of surfaces are performed. Woodworking and welding are also completed onsite at Hinckley. VOC andHAP emissions result from the use of glues, putties, resins, gelcoats, cleaning solvents, and occasional touch up/repair work. Grinding, buffing, sanding, cutting, etc. generate particulate matter emissions.

In two locations where carpentry and machining operations take place, particulate emissions are controlled by cyclones and vented outside. In other woodworking areas such as the fine sanding room and the joiner shop, internal dust collection systems control and contain particulates.

Hinckley is a full-service boat yard. Hinckley cleans exterior boat surfaces, prepares boat surfaces for painting, and provides maintenance and storage for existing boats. Potential emissions include VOC and HAP from fiberglass and gel coat repair, adhesives, and cleaning products. VOC and HAP are also emitted from such operations as bottom painting and painting hull topsides and decks, which are further described in the Surface Coating Operations section. Particulate matter may be generated from preparing surfaces that need to be repaired or painted.

Surface Coating Operations
Hinckley has several designated areas for varnish and paint application. These include the white paint room, the varnish room, and two spray paint bays where the topsides of finished boats are painted with AWLGRIP® (a durable, self-leveling, exterior finish paint used in the marine industry).

Additionally, varnishing and painting is performed in other areas. For example, some of the wood to be varnished is fixed on the boats and varnished in place at various stages in

the process. Occasionally Hinckley must apply exterior finish paint to boats outside of the designated spray booths.

The varnish room is vented with a large fan in a spray application bay. The exhaust is filtered to control particulate matter. All paint in the white paint room is applied by hand. Two windows may be opened in this room to provide ventilation as needed. Fans ventilate the two paint bays where Hinckley currently applies exterior finish paint using spray guns. Given the facility's strict product standards, Hinckley seals the building and filters all incoming air in order to eliminate any particulate matter that could become entrained in the paint that is applied to the boats.

C. External Combustion Units

Hinckley operates two boilers and three make-up air units rated above minimum licensing thresholds for facility heat.

Boilers #1 and #2 are both rated at 1.9 MMBtu/hr and fire distillate fuel. The manufacture dates for these boilers are unknown, but both were installed in 1994.

Make-up Air Heaters #1-3 are rated at 2.5 MMBtu/hr, 2.5 MMBtu/hr, and 1.2 MMBtu/hr, respectively, and they all fire LPG. All of the units were installed in 2002.

1. BPT Findings

The BPT emission limits for the external combustion units are based on the following:

Distillate Fuel (Boilers #1 and #2)

PM	2 lb/1000 gal AP-42 1.3-1, dated 05/10
PM_{10}	2 lb/1000 gal AP--42 1.3-1, dated 05/10
SO_2	0.5 lb/MMBtu The firing of distillate fuel with a sulfur content of 0.5% by weight
NO_x	20 lb/1000 gal AP-42 1.3-1, dated 05/10
CO	5 lb/1000gal AP-42 1.3-1, dated 05/10
VOC	0.34 lb/1000 gal AP-42 1.3-1, dated 05/10
Visible Emissions	06-096 C.M.R. ch. 115, BPT

LPG (Make-up Air Heaters #1-3)

PM	0.7 lb/1000 gal AP-42 Table 1.5-1, dated 07/08
PM_{10}	0.7 lb/1000 gal AP-42 Table 1.5-1, dated 07/08
SO_2	0.018 lb/1000 gal AP-42 Table 1.5-1, dated 07/08 and the firing of propane with a sulfur content of 0.18 gr/100 ft^3
NO_x	13 lb/1000 gal AP-42 Table 1.5-1, dated 07/08
CO	7.5 lb/1000 gal AP-42 Table 1.5-1, dated 07/08
VOC	1 lb/1000 gal AP-42 Table 1.5-1, dated 07/08
Visible Emissions	06-096 C.M.R. ch. 115, BPT

The BPT emission limits for the external combustion units are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1 distillate fuel	0.03	0.03	0.95	0.27	0.07	Negligible
Boiler #2 distillate fuel	0.03	0.03	0.95	0.27	0.07	Negligible
Make-up Air Heater #1 LPG	0.02	0.02	Negligible	0.35	0.20	0.03
Make-up Air Heater #2 LPG	0.02	0.02	Negligible	0.35	0.20	0.03
Make-up Air Heater #3 LPG	0.01	0.01	Negligible	0.19	0.11	0.01

Visible Emissions

Visible emissions from each boiler shall not exceed 20% opacity on a six-minute block average basis.

Visible emissions from each make-up air unit shall not exceed 10% opacity on a six-minute block average basis.

Fuel Sulfur Content Requirements

The Boilers are all licensed to fire distillate fuel which, by definition, has a sulfur content of 0.5% or less by weight. Per 38 M.R.S. § 603-A(2)(A)(3), as of July 1, 2018, no person shall import, distribute, or offer for sale any distillate fuel with a sulfur content greater than 0.0015% by weight (15 ppm). Therefore, beginning July 1, 2018, the distillate fuel purchased or otherwise obtained for use in the boilers shall not exceed 0.0015% by weight (15 ppm).

Fuel Use Limits

Hinckley has requested the removal of fuel use limits associated with its external combustion units in order to ease recordkeeping requirements.

The change in allowable annual emissions associated with this fuel use limit removal fall well below significant emission levels. The potential to emit SO_2 will also decrease on July 1, 2018, once the lower sulfur content requirement for distillate fuel comes into effect (8.9 to 0.53 tons per year).

The Department has determined that the fuel limits can be removed.

2. New Source Performance Standards (NSPS): 40 C.F.R. Part 60, Subpart Dc

   Due to the size and year of manufacture of each boiler, none is subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr manufactured after June 9, 1989. The make-up air heaters are considered to be steam generating units under this subpart; however, they are rated below 10 MMBtu/hr and are therefore not subject.
   [40 C.F.R. § 60.40c]

3. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJJ

   Boilers #1 and #2 are both subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ. The units are considered existing oil boilers rated lower than 10 MMBtu/hr. The make-up air heaters, however, are not subject to this as they are not considered to be boilers under the definition of this subpart. [40 C.F.R. §§ 63.11193, 63.11195, and 63.11237]

   A summary of the currently applicable federal 40 C.F.R. Part 63, Subpart JJJJJJ requirements is listed below. Notification forms and additional rule information can

be found on the following website: https://www.epa.gov/stationary-sources-air-pollution/compliance-industrial-commercial-and-institutional-area-source.

a. Compliance Dates, Notifications, and Work Practice Requirements

(1) Initial Notification of Compliance

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

Hinckley submitted its Initial Notification to EPA on September 12, 2011.

(2) Boiler Tune-Up Program

(i) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]

(ii) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. Because Boilers #1 and #2 are considered oil fired boilers with heat input capacities of less than 5 MMBtu/hr, they are required to be tuned-up every five years. [40 C.F.R. § 63.11223(a) and Table 2]

(iii)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 for up to 72 months from the previous inspection. [40 C.F.R. § 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 C.F.R. § 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 for up to 72 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 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 C.F.R. § 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 C.F.R. § 63.11223(b)(7)]

(iv) 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 C.F.R. § 63.11223(b)(6)]

(v) After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 C.F.R. § 63.11225(a)(4) and 40 C.F.R. § 63.11214(b)]

Hinckley submitted their Notification of Compliance Status to EPA on April 1, 2016.

(3) Compliance Report

A compliance report shall be prepared by March 1st every five years which covers the previous five calendar years. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

(i) Company name and address;

(ii) A statement of whether the source has complied with all the relevant requirements of this Subpart;

(iii) 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;

(iv) The following certifications, as applicable:

1. "This facility complies with the requirements in 40 C.F.R. § 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 §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJJ including the following [40 C.F.R. § 63.11225(c)]:

(1) Copies of notifications and reports with supporting compliance documentation;
(2) 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;
(3) Records of the occurrence and duration of each malfunction of each applicable boiler; and
(4) 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. [40 C.F.R. § 63.11225(a)(4)(vi)]

D. Process Emissions (VOC and HAP)

Hinckley's boatyard activities result in the emission of VOC and HAP from repair work, cleaning, and painting.

Due to the low concentration of air pollutants and high air flow rates associated with Hinckley's processes, conventional emission control devices are either cost prohibitive or technically infeasible. VOC and HAP emissions are instead controlled operationally using pollution prevention methods. By reducing atomization whenever economically and technologically feasible, VOC and HAP emissions can be minimized.

Because of the variability of Hinckley's process and the variety and situational dependence of pollution controls, Hinckley is required to minimize emissions and monitor VOC and HAP by complying with process-wide limits, BPT workplace standards, and other applicable regulations.

Emission Limits

Hinckley shall limit emissions from its boatyard activities so that entire-facility emissions do not exceed the following on a 12-month rolling total basis:

- 35.0 tons per year of VOC
- 24.9 tons per year of HAP
- 9.9 tons per year of any single HAP

Hinckley shall demonstrate compliance with the annual VOC and HAP emission limits by maintaining records of total VOC, total HAP, and single HAP emissions. Records shall be kept on a monthly and 12-month rolling total basis and shall include the following recordkeeping and calculations:

- VOC and HAP Emissions

  Hinckley shall record the total VOC content, total HAP content, and individual HAP content of each VOC and/or HAP containing material used in its boatyard operations.

  Hinckley shall track total VOC and total HAP emissions using the following mass balance for each VOC and/or HAP containing material used, including but not limited to resins, gelcoats, adhesives, paints, cleaning solvents, and catalysts:

$$Monthly\ Emissions = (A - B) * VOC\ or\ HAP\ Content$$

  Where,

A	=	Monthly facility purchases (mass)
B	=	Monthly quantity shipped offsite (mass)

  Hinckley shall track individual HAP emissions using the mass balance above for each individual hazardous air pollutant. When calculating individual HAP emissions from resins or gelcoats, Hinckley may instead elect to using *Unified Emission Factors for Open Molding of Composites (*UEF model*)*[1].

Work Practice Standards

Hinckley shall promote good housekeeping practices (closed lids, proper storage, etc.) and ensure that all VOC / volatile HAP containing materials are handled properly to minimize emissions. The procedure shall ensure that all VOC and/or volatile HAP

[1] The Unified Emission Factors for Open Molding of Composites estimation model was developed by the American Composites Manufacturers Association (formerly the Composites Fabricators Association) to estimate emissions from composites open molding processes. The UEF estimation model is based on a large number of carefully controlled studies and has been extensively verified by comparison to actual stack tests.

containers are properly sealed when not in immediate use and that all of the containers are handled in a manner to reduce the chance of spills.

40 C.F.R. Part 63, Subpart VVVV

Hinckley is not subject to *National Emission Standard for Hazardous Air Pollutants for Boat Manufacturing,* 40 C.F.R. Part 63, Subpart VVVV. This rule does not apply since Hinckley is not manufacturing boats and is not a major source.

40 C.F.R. Part 63, Subpart II

Hinckley is not subject to *National Emission Standards for Shipbuilding and Ship Repair (Surface Coating),* 40 C.F.R. Part 63, Subpart II. Hinckley is not subject to this rule because it does not conduct shipbuilding and/or ship repair operations. For purposes of Subpart II, pleasure crafts are not considered ships.

06-096 C.M.R. ch. 129

Hinckley is not subject to *Surface Coating Facilities,* 06-096 C.M.R. ch. 129. This rule is applicable to facilities that primarily coat cans, fabric, vinyl, metal furniture, flatwood paneling, and/or miscellaneous metal and plastic parts and products with maximum theoretical VOC emissions of 10 tons per year or actual VOC emissions of 2.7 tons per year, each on a 12-month rolling total basis.

Surface coating of the exteriors of completely assembled marine vessels or major marine vessel subassemblies which are exposed to the exterior of the vessel is exempt from this rule. Surface coating completed at Hinckley's Southwest Harbor facility consists primarily of the topsides of boats, and the only metal and/or plastic parts that are coated are major subassemblies such as masts or engines. Because Hinckley does not surface coat any potentially applicable categories of parts, they are not required to maintain records of exemption presented in 06-096 C.M.R. ch. 129(7)(A)(1) and 06-096 C.M.R. ch. 129(7)(B)(1).

06-096 C.M.R. ch. 159

Hinckley is subject to *Control of Volatile Organic Compounds from Adhesives and Sealants,* 06-096 C.M.R. ch. 159. This rule is applicable to facilities that use or apply, for compensation, any adhesive, sealant, adhesive primer, or sealer primer within the state of Maine.

Hinckley shall comply with all applicable requirements contained in 06-096 C.M.R. ch. 159, including the following:

1. VOC Limits

   a. Hinckley shall not use any adhesive, sealant, adhesive primer, or sealant primer with VOC contents above the levels contained in 06-096 C.M.R. ch. 159, Table 1. Due to the variability of materials that could be used, selections of the table have not been provided in this license. [06-096 C.M.R. ch. 159(2)(B)]

   b. The VOC content limits in Table 1 for adhesives applied to particular substrates shall apply as follows [06-096 C.M.R. ch. 159(2)(C)]:

      (1) If an operator uses an adhesive or sealant subject to a specific VOC content limit for such adhesive or sealant in Table 1, such specific limit is applicable rather than an adhesive-to-substrate limit; and

      (2) If an adhesive is used to bond dissimilar substrates together, the applicable substrate category with the highest VOC content shall be the limit for such use.

   c. Hinckley may choose to comply with the VOC limits in Table 1 by using add-on air pollution control equipment meeting the specifications provided in the rule. [06-096 C.M.R. ch. 159(2)(E)]

2. Hinckley shall store or dispose of all absorbent materials, such as cloth or paper, which are moistened with adhesives, sealants, primers or solvents subject to this rule, in non-absorbent containers that shall be closed except when placing materials in or removing materials from the container. [06-096 C.M.R. ch 159(2)(F)]

3. Hinckley shall not require the use or specify the application of any adhesive, sealant, adhesive primer, sealant primer, surface preparation or clean-up solvent if such use or application results in a violation of the provisions of this rule. The prohibition of this section shall apply to all written or oral contracts under which any adhesive, sealant, adhesive primer, sealant primer, surface preparation or clean-up solvent subject to this rule is to be used at any location in Maine. [06-096 C.M.R. ch 159(2)(G)]

4. The following compounds are exempt from requirements of this rule [06-096 C.M.R. ch. 159(3)(A):

   a. Adhesives, sealants, adhesive primers, or sealant primers being tested or evaluated in any research and development, quality assurance, or analytical laboratory, provided records are maintained as required in section 4 of this rule;

   b. Adhesives, sealants, adhesive primers, and sealant primers that are regulated as consumer products under *Control of Volatile Organic Compounds from Consumer Products* 06-096 C.M.R. ch. 152;

c. Adhesives and sealants that contain less than 20 grams of VOC per liter of adhesive or sealant, less water and less exempt compounds, as applied;

d. Cyanoacrylate adhesives;

e. Adhesives, sealants, adhesive primers or sealant primers that are sold or supplied by the manufacturer or supplier in containers with a net volume of 16 fluid ounces or less, or a net weight of one pound or less, except plastic cement welding adhesives and contact adhesives;

f. Contact adhesives that are sold or supplied by the manufacturer or supplier in containers with a net volume of one gallon or less; and

g. Adhesives and sealants that are applied in a dry, powdered form and activated without the use of solvent.

5. Hinckley shall maintain the following records [06-096 C.M.R. ch. 159(4)]:

a. A list of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent, and surface preparation solvent in use and in storage;

b. A data sheet or material list which provides the material name, manufacturer identification, and material application;

c. Catalysts, reducers or other components used and the mix ratio;

d. The VOC content of each product as supplied;

e. The final VOC content or vapor pressure, as applied; and

f. The annual volume of each adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent either used or purchased.

All records required under this Chapter shall be maintained for five years and shall be made available to the Department within 90 days of a request.

06-096 C.M.R. ch. 162

Hinckley is not subject to *Control for Fiberglass Boat Manufacturing Materials,* 06-096 C.M.R. ch. 162. This rule is applicable to any facility that manufactures hulls or decks of boats and related parts, builds molds to make fiberglass boat hulls or decks and related parts from fiberglass, or makes polyester resin putties for assembling fiberglass parts; and whose total actual VOC emissions from these operations exceed 2,449 kilograms (5,400 pounds) per rolling 12-month period, before the application of

control systems and devices. Since Hinckley does not manufacture hulls or decks of boats or related parts or build molds to make fiberglass boat hulls or decks, this regulation does not apply.

E. Process Emissions [Particulate Matter (PM)]

Hinckley's boatyard operations also result in the emission of particulate matter. As part of BPT, Hinckley shall control PM emissions from the process as follows [06-096 C.M.R. ch. 115, BPT]:

1. Hinckley shall control PM emissions from any surface coating process that vents to the ambient air via vent or duct through the use of a particulate filter or dust collection equipment such that visible emissions do not exceed 5% opacity on a six-minute block average basis.

2. Hinckley shall control PM emissions from any cutting, buffing, grinding, or sanding processes that vent to the ambient air via vent or duct through the use of a particulate filter or dust collection equipment such that visible emissions do not exceed 10% opacity on a six-minute block average basis.

3. When both of the above processes exhaust through the same vent, visible emissions shall not exceed 10% opacity on a six-minute block average basis.

4. Hinckley shall reduce the potential for fugitive PM emissions from any process conducted outside by limiting such activity to periods of calm winds or through the use of a shroud or wind curtain.

5. Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity, except for no more than five minutes in any one-hour period during which time visible emissions shall not exceed 30% opacity. Compliance shall be determined by an aggregate of the individual fifteen-second opacity observations which exceed 20% in any one hour.

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

F. Parts Washers

Hinckley utilizes parts washers at its Southwest Harbor facility. The parts washers all contain solvents above 5% VOC by weight. The parts washers are all therefore subject to *Solvent Degreasers,* 06-096 C.M.R. ch. 130. Records shall be kept documenting compliance.

G. Annual Emissions

1. Total Annual Emissions

The tons per year emissions values were calculated based on 8,760 hours of operation of each external combustion unit (does not include insignificant units) and the VOC and HAP emission limits from the boatyard operations. Hinckley shall be restricted to the following annual emissions on a 12-month rolling total basis.

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

	PM	PM_{10}	SO_2	NO_x	CO	VOC
Boilers	0.24	0.24	8.32	2.38	0.60	0.04
Make-up Air Heaters	0.21	0.21	--	3.93	2.27	0.30
Process Emissions	--	--	--	--	--	34.66
Total TPY	**0.5**	**0.5**	**8.4**	**6.4**	**2.9**	**35.0**

Pollutant	Total TPY
Total HAP	24.9
Any Single HAP	9.9

The Process Emissions tons per year limit for VOC is used as a placeholder, assuming that each of the fuel burning equipment fires 8,760 hours per year in order to limit the facility to a total of 35.0 tons per year of VOC emissions. If fuel burning equipment is used to a lesser extent, process emissions may exceed 34.6 tons per year as long as total facility emissions of VOC do not exceed 35.0 tons per year.

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 C.F.R. Part 52, Subpart A, § 52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 C.M.R. ch. 100, 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_2e).

The quantity of CO_2e emissions from this facility is less than 100,000 tons per year, based on the following:

- worst case emission factors from the following sources: U.S. EPA's AP-42, the Intergovernmental Panel on Climate Change (IPCC), and *Mandatory Greenhouse Gas Reporting,* 40 C.F.R. Part 98; and
- global warming potentials contained in 40 C.F.R. 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 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
SO_2	50
NO_x	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-754-71-F-R/A subject to the following conditions.

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 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. § 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 115]

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S. § 353-A. [06-096 C.M.R. ch. 115]

(6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 115]

(11) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. 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 C.F.R. 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 C.M.R. ch. 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 C.F.R. 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 115]

SPECIFIC CONDITIONS

(16) **External Combustion Units**

A. Fuel (distillate fuel fired boilers)

1. Prior to July 1, 2018, the facility shall fire distillate fuel with a maximum sulfur content not to exceed 0.5% by weight. [06-096 C.M.R. ch. 115, BPT]
2. Beginning July 1, 2018, the facility shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [06-096 C.M.R. ch. 115, BPT]
3. Compliance with the sulfur content limits shall be demonstrated by fuel records from the supplier showing the quantity, type, and the percent sulfur of the fuel delivered. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1 distillate fuel	0.03	0.03	0.95	0.27	0.07	NA
Boiler #2 distillate fuel	0.03	0.03	0.95	0.27	0.07	NA
Make-up Air Heater #1 LPG	0.02	0.02	NA	0.35	0.20	0.03
Make-up Air Heater #2 LPG	0.02	0.02	NA	0.35	0.20	0.03
Make-up Air Heater #3 LPG	0.01	0.01	NA	0.19	0.11	0.01

C. Visible Emissions

1. Visible emissions from each boiler shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

2. Visible emissions from each make-up air heater shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

D. Boiler MACT (40 C.F.R. Part 63, Subpart JJJJJJ) Requirements for Boilers #1 and #2. [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. The facility shall implement a boiler tune-up program. [40 C.F.R. § 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. Because all of the boilers are considered to be oil fired boilers with heat input capacities lower than 5 MMBtu/hr, they shall each conduct tune-ups every five years. [40 C.F.R. § 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 for up to 72 months from the previous inspection. [40 C.F.R. § 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 C.F..R § 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 for up to 72 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]
(4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 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 C.F.R. § 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 C.F.R. § 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 C.F.R. § 63.11223(b)(6)]

2. Compliance Report

A compliance report shall be prepared by March 1st every five years which covers the previous five calendar years. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 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 C.F.R. § 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 §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

3. Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJJ including the following [40 C.F.R. § 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. [40 C.F.R. § 63.11225(a)(4)(vi)]

(17) Process Equipment (VOC and HAP)

A. Emission Limits [06-096 C.M.R. ch. 115, BPT]

Hinckley shall limit emissions from its boatyard activities so that entire-facility emissions do not exceed the following on a 12-month rolling total basis:

- 35.0 tons per year of VOC
- 24.9 tons per year of HAP
- 9.9 tons per year of any single HAP

Hinckley shall demonstrate compliance with the annual VOC and HAP emission limits by maintaining records of VOC, total HAP, and single HAP emissions. Records shall be kept on a monthly and 12-month rolling total basis and shall include the following recordkeeping and calculations:

VOC and HAP Emissions

a. Hinckley shall record the total VOC, total HAP, and individual HAP contents of each VOC and/or HAP containing material used in its boatyard activities.

b. Hinckley shall track total VOC and total HAP emissions using the following mass balance for each VOC and/or HAP containing material used, including but not limited to resins, gelcoats, adhesives, paints, cleaning solvents, and catalysts:

$$Monthly\ Emissions = (A - B) * VOC\ or\ HAP\ Content$$

Where,

A = Monthly facility purchases (mass)
B = Monthly quantity shipped offsite (mass)

c. Hinckley shall track individual HAP emissions using the mass balance above for each individual HAP When calculating individual HAP emissions from resins or gelcoats, Hinckley may instead elect to using *Unified Emission Factors for Open Molding of Composites (*UEF model*)*

B. Work Practice Standards

Hinckley shall promote good housekeeping practices (closed lids, proper storage, etc.) and ensure that all VOC / volatile HAP containing materials are handled properly to minimize emissions. The procedure shall ensure that all VOC and/or volatile HAP containers are properly sealed when not in immediate use and that all of the containers are handled in a manner to reduce the chance of spills. [06-096 C.M.R. ch. 115, BPT]

C. 06-096 C.M.R. ch. 159

Hinckley shall comply with all current and applicable requirements contained in *Control of Volatile Organic Compounds from Adhesives and Sealants,* 06-096 C.M.R. ch. 159.

(18) **Process Emissions (Particulate Matter)**

Hinckley shall control PM emissions from all facility processes as follows [06-096 C.M.R. ch. 115, BPT]:

A. Hinckley shall control PM emissions from any surface coating process that vents to the ambient air via vent or duct through the use of a particulate filter or dust collection equipment such that visible emissions do not exceed 5% opacity on a six-minute block average basis.

B. Hinckley shall control PM emissions from any cutting, buffing, grinding, or sanding processes that vent to the ambient air via vent or duct through the use of a particulate filter or dust collection equipment such that visible emissions do not exceed 10% opacity on a six-minute block average basis.

C. When both of the above processes exhaust through the same vent, visible emissions shall not exceed 10% opacity on a six-minute block average basis.

D. Hinckley shall reduce the potential for fugitive PM emissions from any process conducted outside by limiting such activity to periods of calm winds or through the use of a shroud or wind curtain.

E. Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity, except for no more than five minutes in any one-hour period during which time visible emissions shall not exceed 30% opacity. Compliance shall be determined by an aggregate of the individual fifteen-second opacity observations which exceed 20% in any one hour.

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

(19) Parts Washers

Parts washers at Hinckley are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130.

A. Hinckley shall keep records of the amount of solvent added to each parts washer. [06-096 C.M.R. ch. 115, BPT]

B. The following are exempt from the requirements of 06-096 C.M.R. ch. 130 [06-096 C.M.R. ch. 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 06-096 C.M.R. ch. 130.

   1. Hinckley shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 C.M.R. ch. 130]:
      a. Waste solvent shall be collected and stored in closed containers.
      b. 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.
      c. 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.
      d. The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
      e. Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the parts washer.
      f. 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.
      g. Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
      h. Work area fans shall not blow across the opening of the parts washer unit.
      i. 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 C.M.R. ch. 130]

(20) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, 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 C.M.R. ch. 137.

(21) Hinckley 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. § 605).

DONE AND DATED IN AUGUSTA, MAINE THIS 3 DAY OF May , 2018.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Cone for
PAUL MERCER, COMMISSIONER

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

[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: 01/13/2016
Date of application acceptance: 01/21/2016

Date filed with the Board of Environmental Protection:

This Order prepared by Colby Fortier-Brown, Bureau of Air Quality.

Filed
MAY 0 3 2018
State of Maine
Board of Environmental Protection