



DEPARTMENT ORDER

The Talaria Company, LLC  
d/b/a The Hinkley Company, LLC  
Hancock County  
Southwest Harbor, Maine  
A-754-71-G-M

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

FINDINGS OF FACT

After review of the air emission license amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

The Talaria Company, LLC d/b/a The Hinkley Company, LLC (Hinkley) was issued Air Emission License A-754-71-F-R/A on May 3, 2018, for the operation of emission sources associated with their boatyard facility.

Hinkley has requested a minor revision to their license in order to remove Boilers #1 and #2 and lower the facility's annual volatile organic compound (VOC) and hazardous air pollutant (HAP) emission limits.

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

B. Emission Equipment

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

**Boilers**

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type, % sulfur	Date of Manuf.	Date of Install.	Stack #
Boiler #1	1.9	13.6 gal/hr	Distillate fuel, 0.0015%	Pre-1994	1994	1
Boiler #2	1.9	13.6 gal/hr	Distillate fuel, 0.0015%	Pre-1994	1994	2

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

The facility is licensed as follows:

- As a natural minor source of air emissions, because no license restrictions are necessary to keep facility emissions below major source thresholds for criteria pollutants; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

**II. BEST PRACTICAL TREATMENT (BPT)**

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment.

BPT 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. VOC and HAP Emissions Limit Reduction

Hinkley has elected to reduce the total licensed VOC and HAP emissions from its boatyard activities to 24.6 tons/year of VOC, 19.9 tons/year of total HAP, and 7.9 tons/year of any single HAP. All VOC and HAP emissions will continue to be calculated on a 12-month rolling total basis. This reduction in the limits of VOC and HAP emissions does not change the requirements for record keeping, performing monthly emissions calculations, or work practice standards as outlined in Air Emission License A-754-71-F-R/A issued May 3, 2018.

C. Emission Statements

With the reduction in VOC emissions outlined above, Hinkley’s potential annual emissions will drop below the reporting applicability threshold for 06-096 C.M.R. ch. 137, *Emission Statements*, and as such, the associated emission reporting requirements will be removed with the issuance of this license amendment.

Hinkley is still required to maintain such records and report actual emissions for calendar year 2021 in accordance with 06-096 C.M.R. ch. 137 as the facility was subject to these requirements during the year.

D. Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility’s annual air license fee. Only licensed equipment is included, i.e., emissions from insignificant activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included. Maximum potential emissions were calculated based on the following assumptions:

- A facility-wide VOC limit of 24.6 tpy;
- Operating the Make-up Air Heaters for 8,760 hr/yr each.

Please note, this information provides the basis for fee calculation only and should not be construed to represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

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

	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Make-up Air Heaters	0.3	0.3	--	3.9	2.3	0.3
Process Emissions	--	--	--	--	--	24.6
<b>Total TPY</b>	<b>0.3</b>	<b>0.3</b>	<b>--</b>	<b>3.9</b>	<b>2.3</b>	<b>24.9</b>

Pollutant	Tons/year
Single HAP	7.9
Total HAP	19.9

### III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by case basis. In accordance with 06-096 C.M.R. ch. 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM <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 amendment.

### ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License Amendment A-754-71-G-M subject to the conditions found in Air Emission License A-754-71-F-R/A and the following conditions.

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

### SPECIFIC CONDITIONS

The following shall replace Specific Condition (16) of Air Emission License A-754-71-F-R/A.

#### (16) External Combustion Units

A. Emissions shall not exceed the following [06-096 C.M.R. ch. 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)
Make-up Air Heater #1	0.02	0.02	0.01	0.35	0.20	0.03
Make-up Air Heater #2	0.02	0.02	0.01	0.35	0.20	0.03
Make-up Air Heater #3	0.01	0.01	0.01	0.19	0.11	0.01

B. 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]

The following shall replace Specific Condition (17)(A) of Air Emission License A-754-71-F-R/A.

#### (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:

- 24.6 tons per year of VOC
- 19.9 tons per year of total HAP
- 7.9 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

- 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.
- 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:

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

Where,

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

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

The following shall replace **Specific Condition (20) of Air Emission License A-754-71-F-R/A.**

**(20) Annual Emission Statements**

- A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, Hinkley shall report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory for the 2021 reporting year. The emission statement shall be submitted as specified by the reporting due date in 06-096 C.M.R. ch. 137. [06-096 C.M.R. ch. 137]
- B. After reporting year 2021, Hinkley shall not be subject to the reporting and recordkeeping requirements of 06-096 C.M.R. ch. 137 until such time as the facility amends their license to increase potential annual emissions above any reporting applicability threshold established in 06-096 C.M.R. ch. 137. [06-096 C.M.R. ch. 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 8<sup>th</sup> DAY OF DECEMBER, 2021.

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-754-71-F-R/A.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/27/21

Date of application acceptance: 11/10/21

Date filed with the Board of Environmental Protection:

This Order prepared by Chris Ham, Bureau of Air Quality.

