



DEPARTMENT ORDER

**Cianbro Fabrication and Coating
Corporation
Somerset County
Pittsfield, Maine
A-794-71-H-R**

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

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

Cianbro Fabrication and Coating Corporation (Cianbro) has applied to renew their Air Emission License for the operation of emission sources associated with their metal fabrication and coatings facility.

In addition, Cianbro has requested the removal of the "Additional Painting Building" from their air emission license, as the area that once contained the process is no longer being utilized for this function.

The equipment addressed in this license is located at 335 Hunnewell Avenue, Pittsfield, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers and Heaters

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hr)	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Boiler #1 Paint Shop	1.1	11.7	Propane	2010	2011	1
Boiler #2 Coatings	1.2	12.8	Propane	2013	2014	2
Heater #1 Roof Top Heater	3.5	38.0	Propane	1989	1989	3
Heater #2 Roof Top Heater	5.5	58.0	Propane	1989	1989	4

Cianbro may operate small stationary engines smaller than 0.5 MMBtu/hr. These engines are considered insignificant activities and are not required to be included in this license. However, they are still subject to applicable State and Federal regulations. More information regarding requirements for small stationary engines is available on the Department's website at the link below.

<http://www.maine.gov/dep/air/publications/docs/SmallRICEGuidance.pdf>

Additionally, Cianbro may operate portable engines used for maintenance or emergency-only purposes. These engines are considered insignificant activities and are not required to be included in this license. However, they may still be subject to applicable State and Federal regulations.

Process Equipment

Equipment	Max. Raw Material Process Rate	Pollution Control Equipment	Date of Manuf:	Date of Install
Paint Booth #1	1,200 gal/month	Fabric Filters	1990	1990
Paint Booth #2	800 gal/month	Fabric Filters	1990	1990
Blast Booth	8 Tons of Grit/month	Bag House	1988	1988
Blast Tent	12 pieces/4 hours	Bag House	2015	2015

C. 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 Cianbro does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of currently licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115.

D. Definitions

Metal fabrication and finishing HAP (MFHAP) - Any compound of the following metals: Cadmium, chromium, lead, manganese, or nickel, or any of these metals in the elemental form, with the exception of lead.

Material containing MFHAP - A material containing one or more MFHAP. Any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing MFHAP.

E. Facility Classification

With the VOC limits associated with the paint booths, 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 VOC and 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:

1. the existing state of technology;
2. the effectiveness of available alternatives for reducing emissions from the source being considered; and
3. the economic feasibility for the type of establishment involved.

B. Boilers #1 and #2

Cianbro operates propane-fired Boilers #1 and #2 to provide heat and hot water for their Coatings facility. Boiler #1 has a maximum rated heat input capacity of 1.1 MMBtu/hr, was manufactured in 2010 and installed in 2011. Boiler #2 is rated at 1.2 MMBtu/hr, was manufactured in 2013 and installed in 2014. Each boiler exhausts through its own dedicated stack.

1. BPT Findings

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

Propane

PM/PM ₁₀	0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT
SO ₂	0.018 lb/10 ³ gallons, from AP-42, Table 1.5-1, dated 07/08, assuming an average sulfur content of 0.18 grains per 100 ft ³ of fuel
NO _x	13 lb/10 ³ gallons, from AP-42, Table 1.5-1, dated 07/08
CO	7.5 lb/10 ³ gallons, from AP-42, Table 1.5-1, dated 07/08
VOC	1.0 lb/10 ³ gallons, from 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 boilers 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 Propane	0.06	0.06	0.01	0.15	0.09	0.01
Boiler #2 Propane	0.06	0.06	0.01	0.17	0.10	0.01

Visible emissions from each boiler shall not exceed 10% opacity on a six-minute block average basis.

2. Periodic Monitoring

Periodic monitoring for the boilers shall include recordkeeping to document fuel use both on a monthly and 12-month rolling total basis. Documentation shall include the quantity and type of fuel used.

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

Due to their sizes, Boilers #1 and #2 are not 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. [40 C.F.R. § 60.40c]

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

Gas-fired boilers are exempt from 40 C.F.R. Part 63, Subpart JJJJJ. Boilers #1 and #2 both fire propane and are therefore not 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 JJJJJ. [40 C.F.R. §§ 63.11193 and 63.11195]

C. Heaters #1 and #2

Cianbro operates two propane-fired heaters, designated Heaters #1 and #2, with maximum design heat input capacities of 3.5 MMBtu/hr and 5.5 MMBtu/hr, respectively. The two units are located on the roof of the coating building and are utilized to heat the spray booths.

1. BPT Findings

The BPT emission limits for the two heaters were based on the following:

Propane

PM/PM ₁₀	0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT
SO ₂	0.018 lb/10 ³ gallons, from AP-42, Table 1.5-1, dated 07/08, assuming an average sulfur content of 0.18 grains per 100 ft ³ of fuel
NO _x	13 lb/10 ³ gallons, from AP-42, Table 1.5-1, dated 07/08
CO	7.5 lb/10 ³ gallons, from AP-42, Table 1.5-1, dated 07/08
VOC	1.0 lb/10 ³ gallons, from AP-42, Table 1.5-1, dated 07/08
Visible Emissions	06-096 C.M.R. ch. 115, BPT

The BPT emission limits for each of the heaters are the following:

<u>Unit</u>	<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>Origin and Authority</u>
Heaters #1 and #2	PM	0.05	06-096 C.M.R. ch. 115, BPT

The BPT emission limits for the two heaters are the following:

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM₁₀ (lb/hr)</u>	<u>SO₂ (lb/hr)</u>	<u>NO_x (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
Heater #1 Propane	0.18	0.18	0.01	0.48	0.28	0.04
Heater #2 Propane	0.28	0.28	0.01	0.76	0.44	0.06

2. Visible Emissions

Visible emissions from each heater shall not exceed 10% opacity on a six-minute block average basis.

3. Periodic Monitoring

Periodic monitoring for the heaters shall include recordkeeping to document fuel use both on a monthly and 12-month rolling total basis. Documentation shall include the quantity and type of fuel used.

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

Due to their sizes, Heaters #1 and #2 are not 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. [40 C.F.R. § 60.40c]

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

Gas-fired heaters are exempt from 40 C.F.R. Part 63, Subpart JJJJJ. Heaters #1 and #2 both fire propane and are therefore not 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 JJJJJ. [40 C.F.R. §§ 63.11193 and 63.11195]

D. Spray Paint Booths #1 and #2

The Paint Shop at Cianbro includes two spray paint booths that are utilized to paint a variety of equipment and material, ranging from motor vehicles to structural components for construction. Pollutants associated with the operation of painting equipment are PM, PM₁₀, hazardous air pollutants (HAP) and volatile organic compounds (VOC).

Each spray paint booth is equipped with a fabric filter bed that is used to control the PM emissions generated during the painting process. Fumes from inside the spray paint booths are drawn by air movers from the booths and through fabric filter beds where the PM becomes trapped. The filtered emissions that exit the fabric filter beds are exhausted out to atmosphere.

1. National Emissions Standards for Hazardous Air Pollutants (NESHAP):
40 C.F.R. Part 63, Subpart XXXXXX

Cianbro is subject to 40 C.F.R. Part 63, Subpart XXXXXX, *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories* because they are primarily engaged in the fabrication and coating of metal products. Spray-applied painting operations that use paints or coatings that contain MFHAP have specific requirements and are subject to this subpart. Although the Department has not taken delegation of this area source MACT (Maximum Achievable Control Technology) rule that was promulgated by the U. S. Environmental Protection Agency (EPA), Cianbro must still satisfy the requirements for record keeping, reporting, emissions control and testing as required in 40 C.F.R. Part 63, Subpart XXXXXX.

2. State of Maine Rules
06-096 C.M.R. ch. 129: Surface Coating Facilities

Cianbro is subject to *Surface Coating Facilities*, 06-096 C.M.R. ch. 129 under the category of surface coating of miscellaneous metal and plastic parts and products. The definition of "miscellaneous metal and plastic parts and products" includes but is not limited to fabricated metal products, automotive or transportation equipment, commercial and industrial machinery and equipment, construction equipment, metal pipes and other industrial and household products. Under this regulation, Cianbro is subject to specific emission limits based on the type of coating applied.

- a. Emission Limitations

Actual VOC emissions from the two paint booths are expected to exceed 2.7 tons per year. As such, the emission limitations in Section 4 of ch. 129 are applicable. Cianbro has elected to utilize Control Option 1, the use of low-VOC content coatings to be applied with one or more of the following application methods, to comply with the VOC limits specified in Table 1 of 06-096 C.M.R. ch, 129, Section 4(F)(5):

- (1) High volume-low pressure (HVLP) spray;
- (2) Electrostatic spray;
- (3) Zinc-arc spray;
- (4) Air-assisted airless spray;
- (5) Airless spray;
- (6) A flow coating technique;
- (7) Dip coat, including electrodeposition; or
- (8) Another method with a transfer efficiency equivalent to or better than that achieved by HVLP spraying.

The equipment and components painted in Paint Booths #1 and #2 are air dried, meaning that they are not baked at a temperature at or above 194°F. Therefore, Cianbro is limited to using coatings with VOC contents equal to or less than the values in Table 1 below (excerpted from 06-096 C.M.R. ch, 129, Section 4(F)(5)), as specified by coating category:

Table 1 (partial) - Miscellaneous Metal Parts and Products VOC Content Limits

Coating category	Air Dried	
	kg VOC/l coating	lb VOC/gal coating
General One Component	0.34	2.8
General Multi Component		
Camouflage	0.42	3.5
Electric-Insulating Varnish		
Etching Filler		
Extreme High-Gloss		
Extreme Performance		
Heat-Resistant		
High Performance Architectural	0.74	6.2
High Temperature	0.42	3.5
Metallic		
Military Specification	0.34	2.8
Mold-Seal	0.42	3.5
Pan Backing		
Prefabricated Architectural Multi-Component		
Prefabricated Architectural One-Component		
Pretreatment Coatings		
Repair and Touch Up		
Silicone Release		
Solar-Absorbent		
Vacuum-Metalizing		
Drum Coating, New, Exterior		
Drum Coating, New, Interior	0.42	3.5
Drum Coating, Reconditioned, Exterior		
Drum Coating, Reconditioned, Interior		

The VOC limits specified in the above table for the coating of miscellaneous metal parts and products shall not apply to the following types of coatings and coating operations:

- Stencil coatings;
- Safety-indicating coatings;
- Solid-film lubricants;
- Electric-insulating and thermal-conducting coatings;
- Magnetic data storage disk coatings; and
- Plastic extruded onto metal parts to form a coating.

Also exempted from the requirements of the VOC-content limits shown above are operations involving the application of touchup or repair coatings and the application of textured finishes.

b. Documentation of Method Compliance

Cianbro shall submit documentation to the Department certifying that they are utilizing the Low Solvent Content Coating Technology Compliance Method to meet the VOC limits established in ch. 129, as applicable to Spray Paint Booths #1 and #2. The document shall include:

- (1) Name and location of surface coating facility;
- (2) Name, address and telephone number of the person responsible for the surface coating facility;
- (3) A declaration stating that all coatings applied at Cianbro use low solvent content coating technology.
- (4) Identification of each coating used in Spray Paint Booths #1 and #2, and its coating classification;
- (5) The mass of VOC per volume of each coating, excluding water and exempt compounds, as applied, used each day in Spray Paint Booths #1 and #2; and
- (6) The time at which the surface coating facility's "day" begins if a time other than midnight, local time, is used to define a "day".

If Cianbro deviates from using the Low Solvent Content Coating Technology compliance method to meet the VOC limits established in ch. 129, those changes shall be documented and submitted to the Department in accordance with the recordkeeping and reporting requirements in 06-096 C.M.R. ch. 129 (7)(A).

c. Handling, Storage, and Disposal of Materials Containing VOC

- (1) Cianbro shall utilize vapor-tight containers for the storage of spent or fresh materials containing VOC, and for the storage or disposal of cloth or paper impregnated with VOC that are used for surface preparation, clean up, or coating removal.
- (2) The use of VOC is prohibited for cleanup operations unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.
- (3) Cianbro shall collect all organic solvent used to clean spray guns into a container that is kept closed when material is not being added or removed.
- (4) Cianbro shall pump or drain all organic solvent used for line cleaning into a container that is kept closed when material is not being added or removed.
- (5) Cianbro shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, and/or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, Cianbro may not use more than 1.0 gallons of organic solvent to prepare the booth prior to applying the booth coating.
- (6) Cianbro shall control emissions from washoff operations by:
 - (i) Using tanks that are kept closed when not adding or removing material used for washoff; and
 - (ii) Minimizing dripping by tilting or rotating the part to drain as much organic solvent as possible.

d. Recordkeeping and Reporting

- (1) Cianbro shall maintain all records necessary for demonstrating compliance with the applicable emission limitations in 06-096 C.M.R. ch. 129 for a period of six (6) years. The records shall be made available to the Department for inspection during normal business hours, and Cianbro shall provide copies to the Department or the Environmental Protection Agency (EPA) upon request.
- (2) Cianbro shall submit certification records to the Department that cover the relevant coating unit, line or operation, as well as the method to be used to maintain compliance with this rule upon the startup of any new coating unit, line or operation, or upon changing the method of compliance used for Spray Paint Booths #1 and #2.

- (3) Cianbro shall maintain monthly records on premises to document the name and identification of each coating used and the mass of VOC per volume of each coating, excluding water and exempt compounds, as applied, in Spray Paint Booths #1 and #2 and the total emissions from the surface coating facility.
- (4) Cianbro shall perform testing and submit a report within ninety (90) days of receipt of notice from the Department if equipment operating parameters, staff inspection, air monitoring, or other cause indicate to the Department that Spray Paint Booths #1 and/or #2 may be operating out of compliance with the emission limitations of ch. 129. The testing shall be in accordance with the procedures and methods described in Appendix A of ch. 129, Procedures A through C.
- (5) Cianbro shall notify the Department if VOC emissions generated at their surface coating facility were in excess of the emission limitations in chapter 129 for:
 - (i) Any exempt surface coating operations that exceeded the applicability threshold in Subsection 1(C) of this chapter; or
 - (ii) For Spray Paint Booths #1 and/or #2, any evidence showing excess emissions, or the use of any coatings that do not use the low solvent content coating technology.The notification shall be in writing and shall be submitted within thirty (30) days of the date of the occurrence.
- (6) Notwithstanding the requirements of chapter 129, Cianbro may use, in the aggregate, up to 50 gallons of coatings that exceed the emissions limitations set forth in chapter 129, for any twelve (12) consecutive months, provided Cianbro maintains records of such coatings in accordance with Subsection 7(B)(2) of chapter 129.

3. Additional Recordkeeping

In addition to the recordkeeping required by 06-096 C.M.R. ch. 129, Cianbro shall maintain the following records:

- a. Amount of coating used on a monthly and 12-month rolling total basis which does not meet the VOC content limit, and whether it is an exempt coating such as a stencil coating or safety-indicating coating.
- b. Total emissions of VOC, and individual and total emissions of HAP from the Spray Paint Booths, calculated on a monthly and 12-month rolling total basis.

4. BPT for Spray Paint Booths #1 and #2

BPT for Spray Paint Booths #1 and #2 is determined to be the following:

- a. The utilization of fabric filter beds whenever coating activities are occurring inside Spray Paint Booths #1 and/or #2 to control emissions of PM.
- b. A maintenance, inspection, and repair program for the Spray Paint Booths' filter beds, which shall require periodic inspections of the filters. Cianbro shall document all inspection and maintenance efforts (planned or unplanned) by means of a maintenance, inspection, and repair log.
- c. Implementation of Control Option 1, the use of low VOC-content coatings with levels at or below the limits specified in 06-096 C.M.R. ch. 129 (4)(F)(5), Table 1, and their application with one or more of the approved methods identified in 06-096 C.M.R. ch. 129 (4)(F)(3).
- d. Compliance with all applicable work practices contained in 06-096 C.M.R. ch. 129.
- e. Utilization of good housekeeping practices to minimize fugitive emissions.
- f. Emission limits of 49.4 tons per year for VOC, 9.9 tons per year for any single HAP, and 24.9 tons per year for all HAP combined from the facility's coating processes and operations.
- g. Control of visible emissions from each Spray Paint Booth to below 10% opacity on a six-minute block average basis.

E. Blast Booth and Shot Blasting

Cianbro utilizes a blast booth and a shot blasting process to remove paint and rust from components before repainting them. During the blast process, dust-laden air is exhausted at a rate of 20,000 cfm through a series of 56 filter dust collectors with a rated control efficiency of 99.99% for particles 0.5 microns and larger. The collectors are equipped with an automatic filter blow-down function which activates at a set pressure differential across the filters, to promote higher filter efficiencies. Pollutants associated with the shot blasting are particulate matter (PM) and particulate matter 10 microns and smaller in size (PM₁₀).

1. National Emissions Standards for Hazardous Air Pollutants (NESHAP):
40 C.F.R. Part 63, Subpart XXXXXX, *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*

Dry abrasive blasting operations which use materials that contain MFHAP or have the potential to emit MFHAP are subject to the requirements of this standard. Although the Department has not taken delegation of this area source MACT rule that was promulgated by the EPA, Cianbro must still satisfy the requirements for record keeping, reporting, emissions control and testing as required in this subpart.

2. BPT for Blast Booth and Shot Blasting

BPT for the Blast Booth and Shot Blasting operations is determined to be the following:

- a. Keeping the doors closed in the shot blast booth during shot blast operations.
- b. Proper operation of the blower system including duct work, blowers and dust collection equipment during shot blasting operations.
- c. The use of proper housekeeping practices, including the proper cleaning and disposal of used or spilled materials, as well as the proper storage and handling of unused material and equipment.
- d. Proper maintenance of the entire dust collection system and the frequent changing of the 55 gallon drums used to collect the paint and shot blast dust, as needed.
- e. The implementation of a system for the maintenance, inspection and repair for the blast booth particulate control equipment, which shall incorporate periodic inspections of the blowers and baghouse.
- f. The utilization of a written maintenance, inspection and repair log for the particulate control equipment in which all routine and non-routine maintenance performed, as well as inspection dates, findings and subsequent actions are recorded.
- g. Control of visual emissions from the shot blast process and dust collection equipment to below 10% opacity, based on a 6-minute block average.

F. Welding Operations

Welding operations at Cianbro are an integral part of their metal fabrication process, and can consume more than 2000 pounds of MFHAP-containing welding rod and wire annually. The welding operations at Cianbro are subject to the requirements of 40 C.F.R. Part 63, Subpart XXXXXX, *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*. Although the Department has not taken delegation of this area source MACT rule that was promulgated by the EPA, Cianbro must still satisfy the requirements for record keeping, reporting, emissions control and testing as required in this subpart.

G. Mobile Equipment Refinishing

Cianbro occasionally undertakes contracts to refinish (coat) mobile equipment for other entities such as the State of Maine. This activity is subject to the requirements established in 06-096 C.M.R. ch. 153 - *Mobile Equipment Repair and Refinishing*. Additionally, the surface coating operations associated with the mobile equipment refinishing may also be

subject to the emission limitations of 06-096 C.M.R. ch. 129 – *Surface Coating Operations*. If the emission limitations of ch. 129 apply to specific mobile equipment finishing surface coating operations, the regulatory requirements of ch. 129 shall supersede those of ch. 153. [06-096 C.M.R. ch. 153, (3)(B)(1)]. Otherwise, Cianbro shall comply with the requirements of ch. 153 during mobile equipment refinishing operations. See Section II, subsection (D)(2) of this license for specific information regarding the requirements of 06-096 C.M.R. ch. 129.

1. 06-096 C.M.R. ch. 153 - *Mobile Equipment Repair and Refinishing*

For operations or processes subject to the requirements of ch. 153, Cianbro shall comply with the following:

- a. Surface coatings or coating components shall be mixed in accordance with manufacturer recommendations prior to being applied to mobile equipment or mobile equipment components.
- b. The following finish materials shall be applied to the mobile equipment or mobile equipment components using application techniques prescribed by ch. 153:
 - (1) Automotive pretreatment primer
 - (2) Automotive primer-surfacer
 - (3) Automotive primer-sealer
 - (4) Automotive topcoat
 - (5) Single-stage topcoat
 - (6) 2-stage basecoat/clearcoat
 - (7) 3 or 4-stage basecoat/topcoat
 - (8) Automotive multi-colored topcoat
 - (9) Automotive specialty
- c. Cianbro shall use one or more of the following application techniques when applying any of the finish materials listed above in (1)(b) of this subsection:
 - (1) Flow / curtain coating
 - (2) Dip coating
 - (3) Roller coating
 - (4) Brush coating
 - (5) Cotton-tipped swab coating
 - (6) Electrodeposition coating
 - (7) High volume low pressure (HVLP) spraying
 - (8) Electrostatic spray
 - (9) Airless spray
 - (10) Other coating application methods that Cianbro has demonstrated and the Department has determined achieve emission reductions equivalent to HVLP or electrostatic spray application methods

- d. Spray guns used to apply mobile equipment repair and refinishing coating shall be cleaned by one of the following methods:
- (1) An enclosed spray gun cleaning system that is kept closed when not in use;
 - (2) Unatomized discharge of solvent into a paint waste container that is kept closed when not in use;
 - (3) Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; or
 - (4) Atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.
- e. Cianbro shall implement the following housekeeping and pollution prevention and training measures:
- (1) Fresh and used coatings, solvent, and cleaning solvents, shall be stored in nonabsorbent, nonleaking containers. The containers shall be kept closed at all times except when filling or emptying;
 - (2) Cloth and paper, or other absorbent applicators, moistened with coatings, solvents, or cleaning solvents, shall be stored in closed, nonabsorbent, nonleaking containers;
 - (3) Handling and transfer procedures shall minimize spills during the transfer of coatings, solvents, and cleaning solvents. Written standard operating procedures for the handling and transfer of coatings shall be developed and posted in a conspicuous location; and
 - (4) Cianbro shall ensure that any person who applies mobile equipment repair and refinishing coatings has completed training in the proper use and handling of the mobile equipment repair and refinishing coatings, solvents and waste products in order to minimize the emission of air contaminants and to comply with ch. 153. All applicable personnel shall be trained by January 1, 2005 or upon hiring, whichever is later. Training records shall be kept in order to ensure compliance with ch. 153. These records shall include an outline of the contents of the training session, the dates on which training sessions are conducted, and the names of the attendees.

H. Fugitive Emissions

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.

I. Emission Statements

Cianbro is subject to emissions inventory requirements contained in *Emission Statements*, 06-096 C.M.R. ch. 137. Cianbro shall maintain the following records in order to comply with this rule:

1. Calculations of the VOC and/or HAP emissions from Spray Paint Booths #1 and #2 on a calendar year total basis; and
2. Hours of operation for each emission unit on a monthly basis.
3. Quantity of propane fired in each emission unit on a monthly basis.

In reporting year 2020 and every third year thereafter, Cianbro shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). The Department will use these reports to calculate and invoice for the applicable annual air quality surcharge for the subsequent three billing periods. Cianbro shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3). [38 M.R.S. § 353-A(1-A)]

J. Annual Emissions

1. Total Annual Emissions

Cianbro shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits for the boilers and heaters were calculated based on 8,760 hours per year operation for each unit.

Total Licensed Annual Emissions for the Facility

Tons/year

(used to calculate the annual license fee)

	PM	PM₁₀	SO₂	NO_x	CO	VOC
Boilers #1 and #2	0.50	0.50	0.1	1.40	0.80	0.11
Heaters #1 and #2	1.97	1.97	0.1	5.45	3.14	0.42
Coating Operations	-	-	-	-	-	49.40
Total TPY	2.5	2.5	0.2	6.9	4.0	49.9

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

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 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 (CO₂e).

The quantity of CO₂e 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-794-71-H-R 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) Boilers #1 and #2

A. Fuel

1. Boilers #1 and #2 shall fire propane fuel only. [06-096 C.M.R. ch. 115, BPT]
2. Cianbro shall keep records of fuel use showing the quantity and type of fuel fired in the boilers, on both a monthly and 12-month rolling total basis. [06-096 C.M.R. ch. 115, BPT]

B. Emissions from the two boilers shall not exceed the following:

Emission Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.06	0.06	0.01	0.15	0.09	0.01
Boiler #2	0.06	0.06	0.01	0.17	0.10	0.01

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

C. Visible emissions from each boiler firing propane shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(17) Heaters #1 and #2

A. Fuel

1. Heaters #1 and #2 shall fire propane fuel only. [06-096 C.M.R. ch. 115, BPT]
2. Cianbro shall keep records of fuel use showing the quantity and type of fuel fired in the heaters, on both a monthly and 12-month rolling total basis. [06-096 C.M.R. ch. 115, BPT]

B. The BPT emission limit for each of the heaters is the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
Heaters #1 and #2	PM	0.05	06-096 C.M.R. ch. 115, BPT

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

Emission Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Heater #1	0.18	0.18	0.01	0.48	0.28	0.04
Heater #2	0.28	0.28	0.01	0.76	0.44	0.06

D. Visible Emissions from each heater firing propane shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(18) Spray Paint Booths #1 and #2

A. Cianbro shall utilize the fabric filter beds whenever coating activities are occurring inside Spray Paint Booths #1 and/or #2 to minimize the emissions of PM. [06-096 C.M.R. ch. 115, BPT]

B. Cianbro shall employ a maintenance, inspection and repair program for the Spray Paint Booths' filter beds, which shall require periodic inspections of the filters. Cianbro shall document compliance with this requirement by means of a maintenance, inspection and repair log, in which all routine and non-routine inspection and maintenance activities performed shall be documented, along with the dates they were performed and any subsequent findings and corrective actions that were taken. [06-096 C.M.R. ch. 115, BPT]

C. Cianbro shall use Control Option 1 as described in 06-096 C.M.R. ch. 129 (4)(F)(2)(a), in conjunction with one or more of the application methods identified in 06-096 C.M.R. ch. 129 (4)(F)(3), as the method of achieving the VOC limits specified in 06-096 C.M.R. ch. 129 (4)(F)(5) for Spray Paint Booths #1 and #2. [06-096 C.M.R. ch. 129]

D. Cianbro shall submit a document to the Department certifying that they are utilizing Control Option 1 to meet the applicable VOC limits established in ch. 129. The document shall include:

1. Name and location of surface coating facility;
2. Name, address and telephone number of the person responsible for the surface coating facility;
3. A declaration stating that all coatings applied at Cianbro use low solvent content coating technology.
4. Identification of each coating used in Spray Paint Booths #1 and #2, and its coating classification;
5. The mass of VOC per volume of each coating, excluding water and exempt compounds, as applied, used each day in Spray Paint Booths #1 and #2; and
6. The time at which the surface coating facility's "day" begins if a time other than midnight, local time, is used to define a "day".

[06-096 C.M.R. ch. 129(7)(A)(2)]

- E. Cianbro may use, in the aggregate, up to 50 gallons of coatings that exceed the emissions limitations set forth in chapter 129, for any twelve (12) consecutive months, provided Cianbro maintains records of such coatings in accordance with Subsection 7(B)(2) of chapter 129. [06-096 C.M.R. ch. 129(4)(G)]
- F. Cianbro shall not exceed total annual emissions of 49.4 tons per year of VOC, 9.9 tons per year of any single HAP, or 24.9 tons per year of any combination of HAP from their facility's coating processes and operations, based on a twelve-month rolling total. [06-096 C.M.R. ch. 115, BPT]
- G. Cianbro shall maintain a record of coating materials used, to demonstrate compliance with the VOC and HAP emission limits. The records shall contain the following for each coating used: type/category of coating and associated limit from Table 1, the volume used, the VOC and HAP content for each coating as purchased, and a Safety Data Sheet (SDS). Records shall be maintained on both a monthly and a twelve-month rolling total basis and shall contain the calculated emissions totals for VOC, single HAP and total HAP. [06-096 C.M.R. ch. 115, BPT]
- H. Cianbro shall only utilize coatings with VOC contents equal to or less than the values as specified by coating category, as listed in Table 1 below, excerpted from 06-096 C.M.R. ch. 129(4)(F)(5):

Table 1. Miscellaneous Metal Parts and Products VOC Content Limits

Coating category	Air Dried	
	kg VOC/l coating	lb VOC/gal coating
General One Component	0.34	2.8
General Multi Component		
Camouflage	0.42	3.5
Electric-Insulating Varnish		
Etching Filler		
Extreme High-Gloss		
Extreme Performance		
Heat-Resistant	0.74	6.2
High Performance Architectural		
High Temperature	0.42	3.5
Metallic		
Military Specification	0.34	2.8

Coating category	Air Dried	
Mold-Seal	0.42	3.5
Pan Backing		
Prefabricated Architectural Multi-Component		
Prefabricated Architectural One-Component		
Pretreatment Coatings		
Repair and Touch Up		
Silicone Release		
Solar-Absorbent		
Vacuum-Metalizing		
Drum Coating, New, Exterior		
Drum Coating, New, Interior	0.42	3.5
Drum Coating, Reconditioned, Exterior		
Drum Coating, Reconditioned, Interior	0.50	4.2

The VOC limits specified in the above table for the coating of miscellaneous metal parts and products shall not apply to the following types of coatings and coating operations:

1. Stencil coatings;
2. Safety-indicating coatings;
3. Solid-film lubricants;
4. Electric-insulating and thermal-conducting coatings;
5. Magnetic data storage disk coatings; and
6. Plastic extruded onto metal parts to form a coating.

However, the VOC emissions from the above operations shall be documented, recorded, and counted as part of the facility's VOC facility wide total emissions.

[06-096 C.M.R. ch. 129(4)(F)(2)(a)]

I. Cianbro is subject to the work practice standards contained in Section 5 of 06-096 C.M.R. ch, 129. These requirements include:

1. The use of vapor-tight containers for storage of spent or fresh VOC and for the storage or disposal of cloth or paper impregnated with VOC that are used for surface preparation, clean up, or coating removal. [06-096 C.M.R. ch. 129 (5)(A)]
2. The use of VOC is prohibited for cleanup operations unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere. [06-096 C.M.R. ch. 129 (5)(B)]

3. Cianbro shall collect all organic solvent used to clean spray guns into a container that is kept closed when not adding or removing material. [06-096 C.M.R. ch. 129 (5)(B)(1)]
4. Cianbro shall pump or drain all organic solvent used for line cleaning into a container that is kept closed when not adding or removing material. [06-096 C.M.R. ch. 129 (5)(B)(2)]
5. Cianbro shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, and/or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, Cianbro may not use more than 1.0 gallons of organic solvent to prepare the booth prior to applying the booth coating. [06-096 C.M.R. ch. 129 (5)(B)(3)]
6. Cianbro shall control emissions from washoff operations by:
 - a. Using normally closed tanks for washoff; and
 - b. Minimizing dripping by tilting or rotating the part to drain as much organic solvent as possible.[06-096 C.M.R. ch. 129 (5)(B)(4)(a) and (b)]
- J. Cianbro shall maintain all records necessary for demonstrating compliance with the applicable emission limitations in 06-096 C.M.R. ch. 129 for a period of six (6) years. The records shall be made available to the Department for inspection during normal business hours, and Cianbro shall provide copies to the Department or the EPA upon request. [06-096 C.M.R. ch. 129 (7)]
- K. Cianbro shall submit certification records to the Department that cover the relevant coating unit, line or operation, as well as the method to be used to maintain compliance with this rule upon the startup of any new coating unit, line or operation, or upon changing the method of compliance used for Spray Paint Booths #1 and #2. [06-096 C.M.R. ch. 129 (7)(A)]
- L. Cianbro shall maintain monthly records on premises to document the name and identification of each coating and the mass of VOC per volume of each coating, excluding water and exempt compounds, as applied, in Spray Paint Booths #1 and #2. [06-096 C.M.R. ch. 129 (7)(B)(2)]

- M. Cianbro shall perform testing and submit a report within ninety (90) days of receipt of notice from the Department if equipment operating parameters, staff inspection, air monitoring, or other cause indicate to the Department that Spray Paint Booths #1 and/or #2 may be operating out of compliance with the emission limitations of ch. 129. The testing shall be in accordance with the procedures and methods described in Appendix A of ch. 129, Procedures A through C. [06-096 C.M.R. ch. 129 (6)]
- N. Cianbro shall notify the Department if VOC emissions generated at their facility were in excess of the emission limitations in chapter 129 for:
1. Exempt surface coating operations that exceeded the applicability threshold in Subsection 1(C) of this chapter; or
 2. For Spray Paint Booths #1 and/or #2, any evidence showing excess emission, or the use of any coatings that do not meet the VOC emission limits stipulated by chapter 129 for low solvent content coatings.
- The notification shall be in writing, and shall be submitted within thirty (30) days of the use of these coatings.
[06-096 C.M.R. ch. 129 (8)(B)(1) and (2)]
- O. Cianbro shall maintain records, on a monthly and 12-month rolling total basis, of coatings used that do not meet the VOC content limits specified in ch. 129, and whether it is an exempt coating (such as a stencil coating or safety-indicating coating). [06-096 C.M.R. ch. 115, BPT]
- P. Cianbro shall control visible emissions from each Spray Paint Booth below 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(19) Blast Booth and Shot Blasting

- A. Cianbro shall keep the doors to the blast booth closed during shot blast operations. [06-096 C.M.R. ch. 115, BPT]
- B. Cianbro shall properly operate the blower system for the blast booth during shot blasting operations, including the duct work, blowers and dust collection equipment. [06-096 C.M.R. ch. 115, BPT]
- C. Cianbro shall use proper housekeeping practices in and around the shot blasting operation, including the proper cleaning and disposal of used or spilled materials, as well as the proper storage and handling of unused material and equipment. [06-096 C.M.R. ch. 115, BPT]

- D. The entire dust collection system shall be properly maintained, including the routine changing out of the 55 gallon drums that are used to collect the paint and shot blast dust, as needed. [06-096 C.M.R. ch. 115, BPT]
- E. Cianbro shall implement a system for the maintenance, inspection and repair for the blast booth particulate control equipment, which shall incorporate periodic inspections of the blowers and baghouse. [06-096 C.M.R. ch. 115, BPT]
- F. A written maintenance, inspection and repair log shall be kept for the particulate control equipment in which all routine maintenance performed, as well as inspection dates, findings and subsequent actions are recorded. [06-096 C.M.R. ch. 115, BPT]
- G. Visual emissions from the shot blast process and dust collection equipment shall be controlled to below a maximum opacity of 10%, based on a 6-minute block average. [06-096 C.M.R. ch. 115, BPT]

(20) Mobile Equipment Refinishing

For operations or processes that are subject to the requirements of 06-096 C.M.R. ch. 153, Cianbro shall comply with the following:

- A. Surface coatings or coating components shall be mixed in accordance with manufacturer recommendations prior to being applied to mobile equipment or mobile equipment components. [06-096 C.M.R. ch. 153(3)(C)]
- B. The following finish materials shall be applied to the mobile equipment or mobile equipment components using application techniques prescribed by ch. 153:
 - 1. Automotive pretreatment primer
 - 2. Automotive primer-surfacer
 - 3. Automotive primer-sealer
 - 4. Automotive topcoat
 - 5. Single-stage topcoat
 - 6. 2-stage basecoat/clearcoat
 - 7. 3 or 4-stage basecoat/topcoat
 - 8. Automotive multi-colored topcoat
 - 9. Automotive specialty

[06-096 C.M.R. ch. 153(D), Table 1]

C. Cianbro shall use one or more of the following application techniques when applying any of the finish materials listed above in (1)(b) of this subsection:

1. Flow / curtain coating
2. Dip coating
3. Roller coating
4. Brush coating
5. Cotton-tipped swab coating
6. Electrodeposition coating
7. High volume low pressure (HVLP) spraying
8. Electrostatic spray
9. Airless spray
10. Other coating application methods that Cianbro has demonstrated and the Department has determined achieve emission reductions equivalent to HVLP or electrostatic spray application methods.

[06-096 C.M.R. ch. 153(D)]

D. Spray guns used to apply mobile equipment repair and refinishing coating shall be cleaned by one of the following:

1. An enclosed spray gun cleaning system that is kept closed when not in use;
2. Unatomized discharge of solvent into a paint waste container that is kept closed when not in use;
3. Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; or
4. Atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.

[06-096 C.M.R. ch. 153(F)]

E. Cianbro shall implement the following housekeeping and pollution prevention and training measures:

1. Fresh and used coatings, solvent, and cleaning solvents, shall be stored in nonabsorbent, nonleaking containers. The containers shall be kept closed at all times except when filling or emptying;
2. Cloth and paper, or other absorbent applicators, moistened with coatings, solvents, or cleaning solvents, shall be stored in closed, nonabsorbent, nonleaking containers;
3. Handling and transfer procedures shall minimize spills during the transfer of coatings, solvents, and cleaning solvents. Written standard operating procedures for the handling and transfer of coatings shall be developed and posted in a conspicuous location; and

4. Cianbro shall ensure that any person who applies mobile equipment repair and refinishing coatings has completed training in the proper use and handling of the mobile equipment repair and refinishing coatings, solvents and waste products in order to minimize the emission of air contaminants and to comply with ch. 153. All applicable personnel shall be trained by January 1, 2005 or upon hiring, whichever is later. Training records shall be kept in order to ensure compliance with ch. 153. These records shall include an outline of the contents of the training session, the dates on which training sessions are conducted, and the names of the attendees.

[06-096 C.M.R. ch. 153(G)]

(21) **Fugitive Emissions**

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

(22) **Annual Emission Statement**

- A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, Cianbro 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.
- B. Cianbro shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:
 1. Calculations of the VOC and/or HAP emissions from the application of coatings in Spray Paint Booths #1 and #2, on a calendar year total basis; and
 2. Hours of operation for each emission unit on a monthly basis.

[06-096 C.M.R. ch. 137]

- C. Beginning with reporting year 2020 and every third year thereafter, Cianbro shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). Cianbro shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3). [38 M.R.S. § 353-A(1-A)]

Cianbro Fabrication and Coating
Corporation
Somerset County
Pittsfield, Maine
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Departmental
Findings of Fact and Order
Air Emission License
Renewal

- (23) Cianbro 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 11 DAY OF January, 2019.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie Loyzim
MELANIE LOYZIM, ACTING 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: August 22, 2016
Date of application acceptance: August 29, 2016

Date filed with the Board of Environmental Protection:

This Order prepared by Patric J. Sherman, Bureau of Air Quality.

