C&L Aerospace Holdings, LLC
d/b/a C&L Aviation Services
Penobscot County
Bangor, Maine
A-1093-71-A-N (SM)

Departmental
Findings of Fact and Order
Air Emission License

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

C&L Aerospace Holdings, LLC d/b/a C&L Aviation Services (C&L) has applied for an Air Emission License permitting the operation of emission sources associated with their aircraft exterior painting facility. The equipment addressed in this license is located at 112 Polk Street, Bangor, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Fuel Burning Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Installation Date	Stack #
MAU-1 (Make-up Air Unit)	TBD	TBD	Natural gas	2014	TBD
MAU-2 (Make-up Air Unit)	TBD	TBD		2014	TBD
EVAP-1 (Waste Water Evaporator)	0.327	327 scf/hour		2014	TBD

Note: Although there is a boiler located and operated at this facility, the boiler is owned and licensed by the City of Bangor as Boiler 463-1 in Air Emission License A-906-71-E-R/A(SM), issued May 27, 2010. This boiler will not be addressed further in this license.

Note: Stack labels and heights are not yet identified, pending a construction bid approval and the final plans contained therein.

Process Equipment

Equipment	Maximum Raw Material Process Rate	Date of...		Method of Application	Stack #
		Manufacture	Installation		
Primer Paint Booth	0.125 gal/hour primer	2014	2014	HVLP paint gun	PB-1
Topcoat Paint Booth	0.25 gal/hour topcoat	2014	2014	HVLP paint gun	PB-1
Stripper Application (Hangar)	4.2 gal/hour stripper	2014	2014	Airless pump	TBD
Primer Application (Hangar)	6.9 gal/hour primer	2014	2014	Electrostatic spray	TBD
Topcoat Application (Hangar)	9.25 gal/hour topcoat	2014	2014	Electrostatic spray	TBD
Gun Solvent Use (Hangar)	15.2 gal/hour gun solvent	2014	2014	n/a	TBD
Wash Solvent Use (Hangar)	18.75 gal/hour wash solvent	2014	2014	n/a	TBD

Solvent Cleaners

Equipment	Capacity	Solvent Used	Solvent VOC Content
Gun Cleaner - 1	TBD	Not Yet Identified	80%
Gun Cleaner - 2	TBD	Not Yet Identified	80%

C. Application Classification

A new source is classified as either a major or a minor source based on whether or not expected emissions exceed the "Significant Emissions" levels as defined in the Department's regulations. The expected emissions for this new source are considered to be the maximum future license allowed emissions, as follows:

Pollutant	Maximum Future Licensed Emissions (TPY)	Significant Level (TPY)
PM	--	100
PM_{10}	--	100
SO_2	--	100
NO_x	--	100
CO	--	100
VOC	47.5	50
CO_2e	--	100,000

The Department has determined the facility is a minor source, and the application has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended). With the limits on coatings and corresponding VOC emissions, the facility is licensed below the major source thresholds and is considered a synthetic minor stationary source of air emissions.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

1. Introduction to BPT

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 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

2. Facility Description

C&L is expanding their services to include aircraft exterior painting operations. Plans include the retrofit of an existing hangar to accommodate equipment and systems to remove old coatings; apply primer coatings and topcoats; and contain, reuse, dispose of, and otherwise handle the materials used in the aircraft exterior painting process. Air emissions from the C&L facility are from the paint strippers, solvents, and aircraft paints used in coating removal; coating mixing, application, drying, and curing; spray gun cleaning; solvent wipe and solvent flush cleaning; and material and waste handling.

A general process description might include the following: When an aircraft arrives for repainting, the aircraft is brought into the hangar and prepared for the removal of the existing exterior paints (stripping). A chemical stripping agent (stripper) is applied to the aircraft within the hangar building. The sludge of old paint and residual stripper ends up on the hangar floor, previously sealed and impervious to paint strippers used on the aircraft. After removal and containment of the sludge, the aircraft is then high-pressure rinsed with clean water, creating wastewater. This resulting wastewater is conveyed to the wastewater evaporator to remove the water component by

evaporation, leaving behind residual stripper and other contaminants. Residual sludge/liquid wastes will be handled and disposed of in accordance with state and federal requirements which are beyond the scope of this license.

Once the surface of the aircraft is cleaned and prepared for recoating, a primer coat is applied via electrostatic spray, the appropriate drying/curing time allowed to elapse, and then a topcoat applied via electrostatic spray.

B. Fuel Burning Equipment

Each of the three fuel-burning units identified in the table entitled *Fuel Burning Equipment* in Section I of this license will fire natural gas and have a maximum heat input rating less than 1.0 MMBtu/hour, the threshold required for inclusion in the air emission license. However, the units still may be subject to applicable requirements of 06-096 CMR 101, *Visible Emissions Regulation.*

The Waste Water Evaporator, rated at 0.327 MMBtu/hour, shall be used to minimize the quantity of sludge waste from the stripping process by evaporating out the water component of the waste material. The stripper substance has a boiling point in the range between 340 °F to 401.5 °F, much higher than water's boiling point. This technology is used in similar processes and is not expected to result in emissions of air pollutants other than from the burning of the fuel to provide heat for the process.

The Department finds that the operation of the fuel-burning Waste Water Evaporator system firing natural gas is BACT for this process.

C. Process Equipment

Process emission sources at C&L are those involving painting/stripping activities. Pollutants from these activities include particulate matter, volatile organic compounds (VOC), and hazardous air pollutants (HAP). The volume and identities of specific emissions are dependent on the number of aircraft painted throughout the year, aircraft size, paint type, etc. Process units utilized at C&L's facility are the coating applications identified in the table entitled *Process Equipment* in Section I of this license. The gallons/hour usage rates of coatings and solvents identified in this license are based on the stripping and recoating of 72 aircraft per year. Estimated emissions and emission limits are based on the use of the primer and topcoat with the highest VOC and HAP content of those which might be applied, based on which coating manufacturer's product is used and customer specifications.

1. Coatings Applications: BACT Analysis

Alternatives to minimize emissions include the use of water-based coatings and high-efficiency application methods. Water-based coatings such as those

used in the automotive industry are unsuitable for aircraft. Aircraft paints are subjected to extreme variations in use. Within a few minutes, the aircraft skin temperature could go from +70 °C to -60 °C. At high cruising altitudes, the paint is exposed to intense ultra-violet radiation. During flight, the wings flex up and down in turbulence; with each climb and descent the pressurized cabin expands and contracts. The paint must also retain adequate elasticity at extremely low temperatures. Further, it must withstand rain, hail, ice crystal, sand grains, spilled oil, kerosene, and hydraulic fluid. Even when subjected to the most intense ultraviolet radiation, the pigment must lose nothing of its original brilliance. Coatings other than solvent-based coatings cannot meet the required performance specifications; thus the use of water-based coatings is not a viable option for such applications.

High-efficiency application methods as identified in 40 CFR Part 63, Subpart HHHHHH, *NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*, include the use of high volume, low pressure (HVLP) spray guns, electrostatic application, airless spray guns, air-assisted airless spray guns, or equivalent technologies. C&L shall employ application practices using HVLP paint guns, airless spray guns, and electrostatic spray application which reduces overspray and minimizes quantities of coating material used.

No materials containing methylene chloride (e.g. paint stripper) will be used at the C&L facility.

2. Coatings Applications: BACT Determination

The Department finds the following as BACT for the application of primer and topcoat materials at this facility:

a. Electrostatic and/or high volume, low pressure (HVLP) spray technology shall be utilized for applying primers and topcoats.

b. All material containing VOC shall be stored in closed containers except during actual use.

c. All cleaning of HVLP paint spray guns will be done in a closed lid gun wash cabinet so that an atomized mist or spray of gun cleaning solvent and paint residue is not created. Cleaning of electrostatic paint equipment is done manually without any atomization spray.

d. Exhausts from all spray booths (and the entire hangar, when it is used as a large spray booth), shall be equipped with dry filters to control particulate emissions from overspray generated during the spray application of coatings. The filters shall be demonstrated to achieve at least 98% capture efficiency, based on filter efficiency data from the filter manufacturer, as

specified and required in 40 CFR Part 63, Subpart HHHHHH §63.11173(e).

3. Process Washing and Spray Gun Cleaning

A custom blended solvent will be used for process washing and for spray gun cleaning, comprised of 80% methyl ethyl ketone (MEK) and 20% acetone, to achieve reduced VOC and zero HAP emissions. C&L shall submit current Safety Data Sheets (SDS) to the Department after production and receipt of the first batch of the custom solvent created by the solvent vendor.

4. Chemical Usage and Documentation

C&L shall be limited to the quantities of stripping and coating materials specified as follows:

Materials	Quantity and VOC/HAP Content Limits
Paint Strippers	7,200 gallons/year, not to exceed 40% VOC by weight and 0% HAP by weight
Spray Primers	2,000 gallons/year, not to exceed 71% VOC by weight and 27% HAP by weight
Spray Topcoats	4,000 gallons/year, not to exceed 51% VOC by weight and 5% HAP by weight
Gun Cleaning Solvents	2,200 gallons/year, not to exceed 80% VOC by weight and 0% HAP by weight
Wash Solvents	5,400 gallons/year, not to exceed 80% VOC by weight and 0% HAP by weight

C&L shall demonstrate compliance with the above materials usage limits through recordkeeping. Records shall include the following:

1. SDS for each stripper, primer, coating, and cleaning solvent used;
2. The percent by weight of VOC and the percent by weight of HAP in each substance;
3. The quantity of each substance used, on both a monthly and a 12-month rolling total basis; and
4. The calculated quantities of VOC and HAP emitted, on both a monthly and a 12-month rolling total basis.

Calculations of emissions shall be based on SDS information, the usage log, purchase records, and the assumption that 100% of VOC and HAP contained in the applied substances is released to the atmosphere.

D. Potentially Applicable Regulations

1. 40 CFR Part 63, Subpart GG, *National Emission Standards for Aerospace Manufacturing and Rework Facilities*

   This federal regulation applies to major HAP sources, as defined in 40 CFR Part 63. Because C&L is not a major HAP source, the facility is not subject to this subpart. [40 CFR §63.741 (a)]

2. 40 CFR Part 63, Subpart HHHHHH, *NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

   C&L is subject to applicable requirements of 40 CFR Part 63, Subpart HHHHHH. This facility is an area source of HAP which performs spray application of coatings to metal substrates. The parts of the C&L facility subject to requirements of this regulation include but are not limited to the following:
   a. Mixing rooms and equipment;
   b. Spray booths, ventilated prep stations, curing ovens, and associated equipment;
   c. Spray guns and associated equipment;
   d. Spray gun cleaning equipment; and
   e. Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint.

   [40 CFR Part 63, §63.11171(b)]

   C&L shall comply with the applicable requirements of 40 CFR Part 63, Subpart HHHHHH, including but not limited to the following: training and certification requirements; spray booth requirements; enclosure specifications; coating application methods requirements; spray gun cleaning specifications; and notifications, reporting, and recordkeeping requirements. [40 CFR Part 63, Subpart HHHHHH]

3. 06-096 CMR 129, *Surface Coating Facilities*

   The scope of source applicability identified in this rule specifies that only Section 10 of this Chapter applies to Aerospace Manufacturing and Rework Facilities. [06-096 CMR 129 (1)(A)(7)(a)] Section 10 incorporates by reference the applicable requirements of 40 CFR Part 63, Subpart GG for such facilities. Because Subpart GG is not applicable to this source, as explained in "Potentially Applicable Regulations" item 1 above, there are no applicable requirements in 06-096 CMR 129.

4. 06-096 CMR 159, *Control of Volatile Organic Compounds from Adhesives and Sealants*

   The substances used in C&L's aircraft coating process are not considered adhesives or sealants as defined in 06-096 CMR 159. Thus, the facility is not subject to requirements of this rule.

E. Solvent Cleaners

The solvent cleaners, Gun Cleaner-1 and Gun Cleaner-2, shall be manufactured and installed in 2014 with design capacities to be determined based on the final system design. These solvent cleaners are subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended), and records shall be kept documenting compliance.

F. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis, except for no more than one six-minute block average in a one-hour period. [06-096 CMR 101]

G. Annual Emissions

1. Total Annual Emissions

   C&L shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits were calculated based on the stripping and coating materials limits identified in section II (C)(4) of this license.

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	Total HAP
Coating Operations	--	--	--	--	--	47.5	2.4
Total TPY						**47.5**	**2.4**

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 CFR Part 52, Subpart A, §52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), 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).

Based on the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*; 40 CFR Part 98; and the global warming potentials contained in 40 CFR Part 98; C&L is below the major source threshold of 100,000 tons of CO_2e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source shall be determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient air quality impact analysis is not required for a minor source if the total 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 facility licensed emissions 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-1093-71-A-N 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.A. §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 CMR 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 CMR 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 CMR 115]

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

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

(11) In accordance with the Department's air emission compliance test protocol and 40 CFR 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 CFR 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 CMR 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 CFR 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 CMR 115]

(13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the Clean Air Act (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 CMR 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 government 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 CMR 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 CMR 115]

SPECIFIC CONDITIONS

(16) Coating Applications

A. C&L shall utilize electrostatic, high volume, low pressure (HVLP) paint gun, and/or airless pump spray technology to apply strippers, primers, and topcoats in the aircraft coating process. [06-096 CMR 115, BACT]

B. All material containing VOC shall be stored in closed containers except during actual use. [06-096 CMR 115, BACT]

C. All cleaning of HVLP paint spray guns shall be done in a closed lid gun wash cabinet so that an atomized mist or spray of gun cleaning solvent and paint residue is not created. Cleaning of electrostatic paint equipment shall be done either in accordance with the HVLP guns cleaning process or manually without any atomization spray. [06-096 CMR 115, BACT]

D. Exhausts from all spray booths (and the entire hangar, when it is used as a large spray booth), shall be equipped with dry filters to control particulate emissions from overspray generated during the spray application of coatings. The filters shall be demonstrated to achieve at least 98% capture efficiency, based on filter efficiency data from the filter manufacturer, as specified and required in 40 CFR Part 63, Subpart HHHHHH §63.11173(e). [06-096 CMR 115, BACT]

E. No materials containing methylene chloride (e.g. paint stripper) shall be used at the C&L facility. [06-096 CMR 115, BACT]

F. C&L shall be limited to the following quantities of stripping and coating materials:

Process	Quantity and VOC/HAP Content Limits
Paint Stripping	7,200 gallons/year, not to exceed 40% VOC by weight and 0% HAP by weight
Spray Primer	2,000 gallons/year, not to exceed 71% VOC by weight and 27% HAP by weight
Spray Topcoat	4,000 gallons/year, not to exceed 51% VOC by weight and 5% HAP by weight
Gun Cleaning Solvent	2,200 gallons/year, not to exceed 80% VOC by weight and 0% HAP by weight
Wash Solvent	5,400 gallons/year, not to exceed 80% VOC by weight and 0% HAP by weight

[06-096 CMR 115, BACT]

G. C&L shall demonstrate compliance with the above materials usage limits through recordkeeping. Records shall include the following:

1. SDS for each stripper, primer, coating, or cleaning solvent used;

2. The percent by weight of VOC and the percent by weight of HAP in each substance;

3. The quantity of each substance used, on both a monthly and a 12-month rolling total basis; and

4. The calculated quantities of VOC and HAP emitted, on both a monthly and a 12-month rolling total basis.

Calculations of emissions shall be based on SDS information, the daily usage log, purchase records, and the assumption that 100% of VOC and HAP contained in the applied substances is released to the atmosphere.

[06-096 CMR 115, BACT]

H. C&L shall comply with the applicable requirements of 40 CFR Part 63, Subpart HHHHHH, including but not limited to the following: training and certification requirements; spray booth requirements; enclosure specifications; coating application methods requirements; spray gun cleaning specifications; and notifications, reporting, and recordkeeping requirements. [40 CFR Part 63, Subpart HHHHHH]

I. C&L shall submit current Safety Data Sheets to the Department for the custom blended solvent(s) used for process washing and spray gun cleaning, within 30 days after C&L receives the first batch of the custom solvent created by the solvent vendor. [06-096 CMR 115, BPT]

(17) **Solvent Cleaners**

Solvent cleaners at C&L are subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended).

A. C&L shall keep records of the amount of solvent added to each solvent cleaner. [06-096 CMR 115, BPT]

B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 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 CMR 130.

1. C&L shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 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 solvent cleaner.
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 solvent cleaner.
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 CMR 130]

(18) **General Process Sources**

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis, except for no more than one six-minute block average in a one-hour period. [06-096 CMR 101]

(19) **Annual Emission Statement**

A. In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of either of the following:

1. A computer program and accompanying instructions supplied by the Department; or
2. A written emission statement containing the information required in 06-096 CMR 137.

The emission statement must be submitted as specified by the date in 06-096 CMR 137.

B. In addition to the annual VOC and triennial HAP emissions reporting required under 06-096 CMR 137, C&L shall submit to the Department an annual report of VOC and HAP actual emissions. This report shall be submitted by May 15 for the previous calendar year and shall include the breakdown of specific pollutants emitted for each category. The information submitted shall be based on facility records including the following: identities and quantities of specific coatings, strippers, primers, and solvents used; inventory records; SDS; and other information, as necessary. The source of the reported values, including sample calculations, shall be identified for each VOC and HAP included in the report. [06-096 CMR 115, BACT]

(20) C&L 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.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 15 DAY OF January , 2014.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

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

[Note: If a renewal application which is determined by the Department as complete is submitted prior to expiration of this license, then pursuant to Title 5 MRSA §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: December 16, 2013
Date of application acceptance: December 17, 2013

Date filed with the Board of Environmental Protection:

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

Filed
JAN 17 2014
State of Maine
Board of Environmental Protection