STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

DEPARTMENT ORDER

C & L Aerospace Holdings, LLC **d/b/a C & L Aviation Services** **Penobscot County** **Bangor, Maine** **A-1093-71-D-A**	**Departmental** **Findings of Fact and Order** **Air Emission License** **Amendment #3**

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

C & L Aerospace Holdings, LLC d/b/a C & L Aviation Services (C&L) has applied for an Air Emission License amendment permitting the operation of emission sources associated with their aircraft exterior painting facility. Their license, A-1093-71-A-N, was issued on January 17, 2014, was subsequently amended on August 29, 2016 (A-1093-71-B-M), and on July 2, 2020 (A-1093-71-C-A).

C&L has requested an amendment to their license in order to install a Component Paint Booth, a spray gun cleaning operation, and to relocate Component Adhesive Booths into a newly constructed building at the Polk Street location. C&L shall also be adding a paint booth heater, two make up air units, and two small heaters described in the following section.

The equipment addressed in this license amendment is located at 112 Polk Street, Bangor Maine.

B. Emission Equipment

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

Fuel Burning Equipment

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type, % sulfur	Date of Manuf.	Date of Install.	Stack #
PB-3 Heater	0.997	11 gph (LPG) 975 scfh (NG)	LPG, negligible %S Natural Gas, negligible %S	2020	2021	PB-3
MAU-3	1.03	1011scfh	Natural Gas	2020	2021	MAU-3
MAU-4	1.03	1011scfh	Natural Gas	2020	2021	MAU-4
HTR-1*	0.155	152 scfh	Natural Gas	2020	2021	HTR-1
HTR-2*	0.155	152 scfh	Natural Gas	2020	2021	HTR-2

* Note: HTR-1 and HTR-2 are considered insignificant and are included for completeness.

Process Equipment

Equipment	Process	Production Rate	Pollution Control Equipment	Stack #
PB-3	Coating application	0.125 gph primer 0.25 gph topcoat	HVLP paint gun and filter	PB-3
AB-1	Adhesive application	55 gal/year	Annual limit, container size, handling size[1] and storage	AB-1
AB-2	Adhesive application	55 gal/year	Annual limit, container size, handling size[1] and storage	AB-2
GC	Spray Gun Cleaning	271 gal/year	Closed loop	None

Note (1): Adhesive are exempted from Chapter 159 provided they are received in net 1 gallon containers (06-096 C.M.R. ch. 159 §3(A)(6)). Any miscellaneous adhesive/sealants are exempted from Chapter 159 provided they are received in net 16 oz or 1 lb containers or smaller (06-096 C.M.R. ch. 159 §3(A)(5)).

C. Definitions

Adhesive. means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

Cleaning Activities means the use of solvents to remove contaminants including, but not limited to, adhesives, inks, paint, dirt, soil, oil, and grease from parts, products, tools, machinery, equipment, vessels, and work production related areas for a variety of reasons, including safety, operability, and to avoid product contamination; this includes activities such as wiping, flushing, or spraying. Examples of such activities may include, but are not limited to, the cleaning of spray booths, spray guns, and printing presses.

Industrial Cleaning Solvents means products containing VOCs when used for cleaning activities applied to items and surfaces used in manufacturing, processing, mining, and refining or other manufacturing activities.

Records or *Logs* mean either hardcopy or electronic records.

D. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the date this license was issued.

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the "Significant Emission" levels as defined in the Department's *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100. The emission increases are determined by subtracting the current licensed annual emissions preceding the modification from the maximum future licensed annual emissions, as follows:

Pollutant	Current License (TPY)	Future License (TPY)	Net Change (TPY)	Significant Emission Levels
PM	1.9	2.7	+0.8	100
PM_{10}	1.9	2.7	+0.8	100
SO_2	0.02	0.04	+0.02	100
NO_x	3.7	5.1	+1.4	100
CO	3.1	4.2	+1.1	100
VOC	47.9	48.1	+0.2	100

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

E. Facility Classification

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 C.M.R. ch. 115. 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. In addition, the facility is classified as an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

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

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

B. Facility Process Description

C&L services include aircraft exterior painting operations. 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; material and waste handling; and from fuel burning equipment used to heat the buildings.

The latest changes to the facility include the following:

1. The construction of an addition to the Polk Street facility. (This facility has two locations – Polk Street and Griffin Road).
2. Relocation of certain component shop operations to the addition, such as the adhesive booths.
3. Installation of a new paint booth equipped with a natural gas fired heater.
4. Installation of two natural gas fired make up air units.
5. Installation of two small, natural gas fired condensing boilers (considered insignificant and listed for completeness purposes only).

C. Potentially Applicable Regulations

1. Fuel Burning Applications

a. 40 C.F.R. Part 60, Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

Due to their sizes, PB-3 Heater, MAU-3 and MAU-4 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]

b. 40 C.F.R. Part 63, Subpart JJJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers at Area Sources*

PB-3 Heater, MAU-3, and MAU-4 are gas fired units that do not meet the definition of "boiler" as defined by Subpart JJJJJJ. The term "boiler" means an enclosed device using controlled flame combustion in which water is heated to recover thermal energy in the form of steam and/or hot water. Controlled flame combustion refers to a steady-state, or near steady-state, process wherein fuel and/or oxidizer feed rates are controlled.

The units do not heat water to recover thermal energy, thus, Subpart JJJJJJ is not applicable to these units.
[40 C.F.R. § 63.11237]

2. Coating Applications

a. 40 C.F.R. 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 C.F.R. Part 63. C&L is not a major source of HAP emissions; therefore, the facility is not subject to this subpart. [40 C.F.R. § 63.741 (a)]

b. 40 C.F.R. Part 63, Subpart HHHHHH, *NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

C&L is subject to applicable requirements of 40 C.F.R. Part 63, Subpart HHHHHH. This facility is an area source of HAP which performs spray application of coatings to plastic and/or metal substrates. The parts of the C&L facility subject to requirements of this regulation include but are not limited to the following:
(1) Mixing rooms and equipment;
(2) Spray booths, ventilated prep stations, curing ovens, and associated equipment;
(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment; and
(5) Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint.
[40 C.F.R. Part 63, § 63.11171(b)]

C&L shall comply with the applicable requirements of 40 C.F.R. 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 C.F.R. Part 63, Subpart HHHHHH]

c. 06-096 C.M.R. ch. 129, *Surface Coating Facilities*

The following surface coating operations conducted by C&L are exempt from the requirements of the rule:

(1) Exterior of completely assembled aircraft; and
(2) Major aircraft subassemblies which are exposed to the exterior of the aircraft.
[06-096 C.M.R. ch. 129 (3)(a) and (b)]

d. 06-096 C.M.R. ch. 159, *Control of Volatile Organic Compounds from Adhesives and Sealants*

C&L is subject to *Control of Volatile Organic Compounds from Adhesives and Sealants*, 06-096 C.M.R. ch. 159. This regulation applies to any facility that uses or applies, for compensation, any adhesive, sealant, adhesive primer, or sealer primer within the state of Maine.

Adhesives are occasionally used in the aircraft repairs performed at C&L. C&L shall select and purchase adhesives that are exempt from the requirements of chapter 159 - *Control of Volatile Organic Compounds from Adhesives and Sealants.*

e. 06-096 C.M.R. ch. 166, *Industrial Cleaning Solvents*

C&L uses industrial cleaning solvents in cleaning activities as those defined in *Industrial Cleaning Solvents*, 06-096 C.M.R. ch. 166 (Chapter 166). These activities conducted by C&L include the wiping, flushing, or spraying during the cleaning of spray booths, spray guns, and associated equipment. The potential to emit from these activities (before control) is greater than 3.0 tons of VOC per year.

However, the solvent cleaning activities are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130 (Chapter 130), thus are exempt from the requirements of Chapter 166, except for Sections 5(C) and (D) which require C&L to maintain the following:

(1) An owner or operator conducting cleaning activities exempted from Chapter 166 shall maintain records sufficient to verify the exemption. If, in the future, any industrial solvent cleaning activity conducted at C&L is no longer subject to Chapter 130, it may be subject to Chapter 166.
(2) Records verifying that the industrial solvent cleaning activities conducted at C&L are exempt from Chapter 166 shall be maintained for a minimum of 5 years from creation and shall be provided to the Department or EPA upon request.
Note: Although Chapter 166 requires records to be maintained for a minimum of 5 years, Standard Condition (8) found in A-1093-71-A-N (1/15/2014) requires C&L to maintain records for a minimum of 6 years.

D. Paint Booth #3 Heater (PB-3 Heater) and Make-Up Air Units #3 and #4 (MAU-3 and MAU-4)

C&L plans to install a Paint Booth (PB-3) and associated heater (PB-3 Heater) at the facility on Polk Street. The PB-3 Heater is rated at 0.997 MMBtu/hr can be fired with either propane or natural gas. Although PB-3 Heater is technically below the licensing threshold of 1 MMBtu/hr, the heat input is so close to the threshold, C&L decided to include it as part of this licensing action. The PB-3 Heater is to be installed in spring 2022 and exhaust through its own stack.

In addition, C&L plans to install two make up air units, MAU-3 and MAU-4. These units are each are rated at 1.03 MMBtu/hr and fire natural gas. The make-up air units are scheduled to be installed in spring 2022 and exhaust through individual stacks.

1. BACT Findings

C&L submitted the following BACT analysis for control of emissions from PB-3 Heater, MAU-3, and MAU-4:

a. Particulate Matter (PM, PM_{10})
C&L has proposed to burn only low-ash content fuels (propane and/or natural gas) in these units and use good combustion practices. Due to their sizes and relatively low expected emissions, additional add-on pollution controls are not economically feasible.

BACT for PM/PM_{10} emissions from PB-3 Heater, MAU-3, and MAU-4 is the use of good combustion practices and the emission limits listed in the following tables.

b. Sulfur Dioxide (SO_2)

C&L has proposed to fire only propane and/or natural gas. The use of these fuels result in minimal emissions of SO_2, and additional add-on pollution controls are not economically feasible.

BACT for SO_2 emissions from the PB-3 Heater, MAU-3, and MAU-4 is the use of propane and/or natural gas and the emission limits listed in the following table.

c. Nitrogen Oxides (NO_x)

C&L considered several control strategies for the control of NO_x including Selective Catalytic Reduction (SCR), Selective Non-Catalytic Reduction (SNCR), water/steam injection, and flue gas recirculation (FGR).

Both SCR and SNCR are technically feasible control technologies for minimizing NO_x. However, they have a negative environmental impact of emissions of unreacted ammonia. In addition, due to the initial capital cost and the annual operating costs, these systems are typically only considered cost effective for units larger than the PB-3 Heater and the make-up air units.

Water/steam injection and FGR have similar NO_x reduction efficiencies. However, water/steam injection results in reduced efficiency of approximately 5%.

The use of FGR on the PB-3 Heater, MAU-3, and MAU-4 has been determined to be not economical feasible for such small units.

BACT for NO_x emissions from PB-3 Heater, MAU-3, and MAU-4 is the use good combustion practices and the emission limits listed in the following table.

d. Carbon Monoxide (CO) and Volatile Organic Compounds (VOC)

C&L considered several control strategies for the control of CO and VOC including oxidation catalysts, thermal oxidizers, and good combustion practices.

Oxidation catalysts and thermal oxidizers both have high capital, maintenance, and operational costs considering the size of the units in question. These controls were determined to not be economically feasible.

BACT for CO and VOC emissions from PB-3 Heater, MAU-3, and MAU-4 are the use of good combustion practices and the emission limits listed in the following table.

e. Emission Limits

(1) The BACT emission limits for PB-3 Heater, MAU-3, and MAU-4 are based on the following:

Natural Gas

PM/PM_{10}	–	0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BACT
SO_2	–	0.6 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
NO_x	–	100 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
CO	–	84 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
VOC	–	5.5 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
Visible Emissions	–	06-096 C.M.R. ch. 115, BACT

The BACT emission limits for fuel burning in these three units are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
PB-3 Heater	0.05	0.05	0.01	0.10	0.08	0.01
MAU-3	0.05	0.05	0.01	0.10	0.08	0.01
MAU-4	0.05	0.05	0.01	0.10	0.08	0.01

(2) Visible Emissions

Visible emissions from the PB-3 Heater, MAU-3, MAU-4 shall not exceed 10% opacity on a six-minute block average basis.

f. Periodic Monitoring

Periodic monitoring for the PB-3 Heater, MAU-3, and MAU-4 shall include recordkeeping to document fuel use both on a monthly and calendar year total basis.

E. Process Emissions

Process emission sources at C&L are those involving painting, coating, stripping, and cleaning 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. 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 ºC to -60 ºC. 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 C.F.R. Part 63, Subpart HHHHHH, *NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* (Subpart HHHHHH), 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.

   C&L shall comply with the applicable requirements of 40 C.F.R. Part 63, Subpart HHHHHH, including those identified in Section C.2.b. of this license amendment, above. [40 C.F.R. § 63.11177]

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

2. BACT Findings

   a. PB-3

      (1) <u>Particulate Matter Emissions (PM and PM_{10})</u>

      PM and PM_{10} emissions from over-spray of paints are generally controlled via either fabric filters, which reduce PM emissions through the use of woven or nonwoven filter bags, or cartridge filters, which reduce PM emissions through the use of perforated metal cartridges that contain a pleated, nonwoven filtering media, installed at each unit's exhaust point. C&L has proposed to use fabric filters on the exhaust points of the paint booths. Subpart HHHHHH requires all

spray booths, preparation stations, and mobile enclosures to be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. C&L may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. [40 C.F.R. 63.11173(e)(2)(i)]

The Department finds the installation of a GARMAT Tier 1 Paint Booth (or equivalent) and the use of these fabric filters demonstrated to achieve at least 98-percent capture of paint overspray, proper maintenance of the filters, and records of all repair and maintenance conducted on the filters constitute BACT for PM and PM_{10} emissions from the paint booth.

(2) Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) Emissions

VOC and HAP emissions from painting coating operations are attributed to evaporation of material over-spray and vaporization from the applied material prior to completion of the curing process. The maximum potential VOC and HAP emissions from painting coating operations are a function of the potential quantity of material applied and the VOC and/or HAP content of the material as a percentage of the paint or powder coating, by weight.

C&L has proposed to implement the following work practices to minimize VOC and HAP emissions during the storage, mixing, conveyance, use, and application of VOC/HAP containing coatings as follows:

(i) All VOC/HAP-containing coatings, thinners, cleaning materials, and waste materials shall be stored in closed containers or drums.

(ii) The risk of spills of VOC/HAP-containing coatings, thinners, cleaning materials and waste materials shall be minimized.

(iii) All containers, mixing vessels, and drums holding VOC/HAP-containing coatings and other materials shall be free of cracks, holes and other defects and shall remain closed at all times unless materials are being transferred to or removed from them.

(iv) VOC/HAP-containing coatings, thinners, cleaning materials and waste materials shall be conveyed from one location to another enclosed containers or pipes.

(v) Emission of VOC/HAP shall be minimized during cleaning of storage, mixing, and conveying equipment.

(3) Process Washing and Spray Gun Cleaning

Solvents used at both locations (Polk Street and Griffin Road) will be a custom blended solvent 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 retain current Safety Data Sheets (SDS) on the custom blended solvent which shall be submitted to the Department upon request. No materials containing methylene chloride shall be used at the C&L facility.

The Department finds the installation of the GARMAT Tier 1 Paint Booth (or equivalent), work practices minimizing VOC/HAP emissions, the use of HVLP spray guns, process washing and spray gun cleaning, and implementing the applicable requirements of Subpart HHHHHH are considered to be BACT.

3. Adhesive Application Booths

VOC and HAP emissions from adhesive application operations are attributed to evaporation of the applied material. BACT is meeting the requirements of 06-096 C.M.R. ch. 159, *Control of Volatile Organic Compounds from Adhesives and Sealant* (Chapter 159).

Adhesives are occasionally used in the aircraft repairs performed at C&L. C&L intends to select and purchase adhesives for use at their facility in quantities or in concentrations that the compounds are exempt from the requirements of Chapter 159, as follows:

a. Adhesives and sealants that contain less than 20 grams of VOC per liter of adhesive or sealant, less water and less exempt compounds, as applied;
b. Cyanoacrylate adhesives;
c. Adhesives, sealants, adhesive primers, or sealant primers purchased in containers with a net volume of 16 fluid ounces or less, or a net weight of one pound or less, except plastic cement welding adhesives and contact adhesives;
d. Contact adhesives purchased in containers with a net volume of one gallon or less; and
e. Adhesives and sealants that are applied shall be in a dry, powdered form and activated without the use of solvent.

However, if C&L purchases and/or uses products that do not meet the exemption criteria listed in Chapter 159, this regulation and its requirements shall apply to C&L.

C&L shall maintain the following records to document it is only purchasing and using products that are not subject to 06-096 C.M.R. ch. 159:

a. A data sheet or material list which provides the material name, manufacturer identification, and material application;
b. Size of container from the manufacturer or supplier;

c. Catalysts, reducers, or other components used and the mix ratio;
d. The VOC content of each product as supplied;
e. The final VOC content or vapor pressure, as applied; and
f. The annual volume of each adhesive, sealant, adhesive primer, sealant primer, clean-up solvent, and surface preparation solvent used or purchased.

All records shall be maintained for five years and shall be made available to the Department within 90 days of a request. [06-096 C.M.R. ch. 159(4)(C)]

Please note: Although Chapter 159 requires records to be maintained for a minimum of 5 years, Standard Condition (8) found in A-1093-71-A-N (1/15/2014) requires C&L to maintain records for a minimum of 6 years.

F. Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility's annual air license fee. Only licensed equipment is included, i.e., emissions from insignificant activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included.

Maximum potential emissions were calculated based on the following assumptions:

- Fuel burning equipment, including PB-3 Heater, MAU-1, MAU-2, MAU-3, and MAU-4 firing natural gas and in operation 8,760 hr/yr; and
- A facility-wide VOC limit of 47.5 tpy and HAP limit of 2.4 TPY for coating operations.

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

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

	PM	PM_{10}	SO_2	NO_x	CO	VOC	Total HAP
PB #3 Heater	0.3	0.3	0.01	0.5	0.4	0.1	--
Make-up Air Units #1 and #2	1.9	1.9	0.02	3.7	3.1	0.4	--
Make-up Air Units #3 and #4	0.5	0.5	0.01	0.9	0.7	0.1	--
Coating Operations	--	--	--	--	--	47.5	2.4
Total TPY	**2.7**	**2.7**	**0.04**	**5.1**	**4.2**	**48.1**	**2.4**

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 C.M.R. ch. 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 prior table 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 Amendment A-1093-71-D-A subject to the conditions found in Air Emission License A-1093-71-A-N, in amendments A-1093-71-B-M and A-1093-71-C-A, and the following conditions.

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

SPECIFIC CONDITIONS

The following conditions are in addition to the conditions listed in Air Emission License A-1093-71-A-N, A-1093-71-B-M, and A-1093-71-C-A.

(24) **Paint Booth-3 (PB-3)**

A. C&L is licensed to install and operate a new paint booth (PB-3) at their Polk Street site.

B. Equipment and processes discussed in this license shall be subject to the Standard and Specific Conditions found in A-1093-71-A-N, A-1093-71-B-M, and A-1093-71-C-A as applicable.

C. In order to meet BACT and BPT, the coating application equipment, including the paint booths, spray guns, and associated equipment, and processes shall be subject to Specific Condition (16) in A-1093-71-B-M (8/26/2016) and A-1093-71-C-A (7/2/2020).

D. Visible emissions from the spray booth shall not exceed 10% on a 6-minute block average basis. [06-096 C.M.R. ch. 115, BACT]

(25) **Adhesive Booths**

A. C&L shall utilize the following in the adhesive booths and facility wide as to not be subject to *Control of Volatile Organic Compounds from Adhesives and Sealants*, Chapter 159: [06-096 C.M.R. ch. 159(3)(A)(1.-5.)]:

1. Adhesives and sealants that contain less than 20 grams of VOC per liter of adhesive or sealant, less water and less exempt compounds, as applied;
2. Cyanoacrylate adhesives;
3. Adhesives, sealants, adhesive primers, or sealant primers purchased in containers with a net volume of 16 fluid ounces or less, or a net weight of one pound or less, except plastic cement welding adhesives and contact adhesives;
4. Contact adhesives purchased in containers with a net volume of one gallon or less; and
5. Adhesives and sealants that are applied shall be in a dry, powdered form and activated without the use of solvent.

B. If C&L uses adhesives, sealants, adhesive primers, sealant primers, and contact adhesives that are not exempt from the ch. 159, C&L shall be subject to the requirements of Chapter 159.

C. To demonstrate compliance with the exemptions found in ch. 159, C&L shall maintin a list of each adhesive, sealant, adhesive primer, sealant primer, clean-up solvent, and surface preparation solvent in use, and in storage; C&L shall keep the following records:
   1. A data sheet or material list which provides the material name, manufacturer identification, and material application;
   2. Size of container from the manufacturer or supplier;
   3. Catalysts, reducers, or other components used and the mix ratio;
   4. The VOC content of each product as supplied;
   5. The final VOC content or vapor pressure, as applied; and
   6. The annual volume of each adhesive, sealant, adhesive primer, sealant primer, clean-up solvent, and surface preparation solvent used or purchased.

   [06-096 C.M.R. ch. 159 and 06-096 C.M.R. ch. 115, BPT]

D. All records shall be maintained for six years and shall be made available to the Department within 90 days of a request. [06-096 C.M.R. ch. 115, BPT]

(26) **Coating Applications Work Practices**

C&L shall implement with following work practices to minimize VOC and HAP emissions during the storage, mixing, conveyance, use, and application of VOC/HAP containing coatings as follows:

A. All VOC/HAP-containing coatings, thinners, cleaning materials, and waste materials shall be stored in closed containers or drums.

B. The risk of spills of VOC/HAP-containing coatings, thinners, cleaning materials and waste materials shall be minimized.

C. All containers, mixing vessels, and drums holding VOC/HAP-containing coatings and other materials shall be free of cracks, holes and other defects and shall remain closed at all times unless materials are being transferred to or removed from them.

D. VOC/HAP-containing coatings, thinners, cleaning materials and waste materials shall be conveyed from one location to another enclosed containers or pipes.

E. Emission of VOC/HAP shall be minimized during cleaning of storage, mixing, and conveying equipment.

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

(27) **Paint Booth Heater (PB-3 Heater) and Make-up Air Units (MAU-3 and MAU-4)**

A. Fuel

1. C&L is licensed to install, operate, and combust propane and natural gas in PB-3 Heater, and natural gas in MAU-3 and MAU-4. [06-096 C.M.R. ch. 115, BACT]
2. Compliance shall be demonstrated by fuel records showing the type and quantity of the fuel delivered or fuel used (if applicable). Records of annual fuel use or fuel deliveries shall be kept on a monthly and calendar year basis. [06-096 C.M.R. ch. 115, BACT]

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

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
PB-3 Heater	0.05	0.05	0.01	0.10	0.08	0.01
Make up Air Unit #3	0.05	0.05	0.01	0.10	0.08	0.01
Make up Air Unit #4	0.05	0.05	0.01	0.10	0.08	0.01

C. Visible emissions from the PB-3 Heater, MAU-3, and MAU-4 shall each not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BACT]

(29) **06-096 C.M.R. ch. 166, Industrial Cleaning Solvents**

C&L is exempt from ch. 166 because the solvent cleaning activities are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130, except for Sections 5(C) and (D) which require C&L to maintain the following:

A. An owner or operator conducting cleaning activities exempted from Chapter 166 shall maintain records sufficient to verify the exemption. If, in the future, any industrial solvent cleaning activity conducted at C&L is no longer subject to Chapter 130, it may be subject to Chapter 166.

B. Records verifying that the industrial solvent cleaning activities conducted at C&L are exempt from Chapter 166 shall be maintained for a minimum of 6 years from creation and shall be provided to the Department or EPA upon request.

[06-096 C.M.R. ch. 166 and 06-096 C.M.R. ch. 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 24th DAY OF May, 2022.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____ for _____
MELANIE LOYZIM, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-1093-71-A-N.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: January 10, 2022
Date of application acceptance: January 11, 2022

Date filed with the Board of Environmental Protection:

This Order prepared by Lisa P. Higgins, Bureau of Air Quality.

FILED

MAY 24, 2022

State of Maine
Board of Environmental Protection