



DEPARTMENT ORDER

Casco Bay Steel Structures, Inc.
Cumberland County
South Portland, Maine
A-1154-71-A-N

Departmental
Findings of Fact and Order
Air Emission License

FINDINGS OF FACT

After review of the air emission 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 (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. **REGISTRATION**

A. Introduction

Casco Bay Steel Structures, Inc. (Casco) has applied for an Air Emission License for the operation of emission sources associated with their steel bridge fabrication and painting facility.

The equipment addressed in this license is located at 1 Wallace Avenue, South Portland, Maine.

B. Title, Right, or Interest

In their application, Casco submitted copies of a property deed demonstrating ownership of the facility. Casco has provided sufficient evidence of title, right, or interest in the facility for purposes of this air emission license.

C. Emission Equipment

The following equipment is addressed in this air emission license:

Process Equipment

Equipment	Pollution Control Equipment	Emissions Venting Location
Painting Operations	Fabric Filters	Fugitive
Blasting Operations	Fabric Filters	Fugitive

Casco 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, Casco 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.

D. Definitions

Metal fabrication and finishing HAP (MFHAP) means 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 Safety Data Sheet for the material, is considered to be a material containing MFHAP.

E. 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.

Casco is classified as an existing source that is applying for its first air emission license, after-the-fact.

A new source is considered a major source based on whether or not total licensed annual emissions exceed the "Significant Emission" levels as defined in the Department's *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100.

Pollutant	Total Licensed Annual Emissions (TPY)	Significant Emission Levels
PM	0.0*	100
PM ₁₀	0.0*	100
SO ₂	0.0	100
NO _x	0.0	100
CO	0.0	100
VOC	39.9	50

*Although PM and PM10 emissions do occur at Casco, they are not readily quantifiable and as such will not be included in this table.

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.

F. Facility Classification

With the annual VOC limits associated with the painting operations, the facility is licensed as follows:

- As a synthetic minor source of air emissions, because Casco is subject to license restrictions that keep facility emissions below major source thresholds for criteria pollutants; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

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

A. Introduction

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

BPT for 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. Painting Operations

The painting operations at Casco include a spray-painting area used to paint a variety of steel structure and bridge sections. Pollutants associated with the operation of painting equipment are particulate matter, including particulate matter under 10 micrometers (PM), hazardous air pollutants (HAP), and volatile organic compounds (VOC).

The painting area is equipped with a fabric filter to control PM emissions generated during the painting process. Fumes from inside the spray paint area are drawn by air movers from inside the building and through fabric filters, where the PM becomes trapped. The filtered emissions that exit the fabric filters are exhausted outside to the atmosphere.

1. BACT Findings

Casco submitted a BACT analysis for control of emissions from the painting operations at the facility.

Painting is the primary source of air emissions at Casco. The size of the large steel components fabricated at this facility limits the types of surface coating processes that can be used and the types of controls that are technologically feasible. Pollutants from surface coating operations include PM, VOC, and HAP. Possible air pollution control measures fall into three categories: high-transfer efficiency equipment, reduced VOC/HAP coatings, and add-on air pollution control devices such as thermal oxidizers/incinerators, carbon absorbers, condensers, and bioremediation methods.

PM Control

Coating application methods include dip coating, flow coating, roller coating, electrodeposition, powder coating, spray coating, and electrostatic coating. Most of these methods are more suitable for smaller parts or multiple parts of the same size and configuration. Due to the large size and the variability in the shape of the steel structures coated at Casco's facility, the primary and most technologically appropriate method of surface coating is the use of spray coating methods. Other coating methods are considered technically infeasible.

Spray coating methods include air-atomized spray, airless spray, electrostatic spray, and high volume, low pressure (HVLP) spray guns. The transfer efficiency of spray guns varies based on the configuration of the surface, skill of the operator, and type of spray gun used. Air-atomized spray guns use compressed air to atomize the coating into tiny droplets and apply the coating onto the surface. These spray guns typically achieve a transfer efficiency of about 50% when coating a flat surface. HVLP spray guns use either a compressor or a turbine to produce a high volume of air that is delivered to the spray gun at a low pressure. This low-pressure air provides greater control of the spray with less overspray and paint fog, providing a transfer efficiency of about 60%. In airless spray guns, the coating is atomized by forcing it through specially designed nozzles at a pressure of approximately 1000 to 2000 pounds per square inch (psi). Airless spray guns typically achieve a transfer efficiency of 75-80% when coating flat surfaces. Casco is currently using airless spray guns.

Electrostatic spraying can be used in conjunction with various types of spray guns. Electrostatic spraying involves the use of an electrical transformer to deliver up to 60,000+ volts, creating an electric potential between the paint particles and the surface to be coated. The charged paint particles are electrically attracted to the surface and thus increase the transfer efficiency to 75-95%. However, the addition of electrostatic coating is considered technologically infeasible at the Casco facility due to the size and shape of the parts being coated; for example, the inside corners of I-beams would

receive inadequate coating due to Faraday cage effects¹. Although the structures being painted are very large, the painting operations are all conducted in the paint shop of the Wallace Avenue building. Being indoors increases transfer efficiency by minimizing air flow or wind across the parts and contains any overspray that does occur.

Fabric filters in conjunction with air handlers filter air in the spraying area to remove PM from overspray during painting operations. This has been proposed as BACT for control of PM emissions from painting operations at Casco.

VOC and HAP Control

The use of reduced VOC/HAP coatings is not a justifiably feasible option for this facility because the nature of the objects being coated often have requirements of adhesion and corrosion resistance where a reduced VOC/HAP coating is not available to meet that specification.

A thermal oxidizer is add-on control technology which raises the temperature of the exhaust stream to oxidize (burn) or pyrolyze (thermally break down) constituents. In the case of hydrocarbons including VOC and volatile organic HAPS, complete combustion produces carbon dioxide and water. In some cases, especially with low concentration exhaust streams, a catalyst can be used to lower the reaction temperatures and/or improve destruction efficiency and decrease energy use. Many oxidizers such as a regenerative thermal oxidizer (RTO) use various types of heat exchangers to preheat the exhaust and/or recover waste heat from the treated air. However, the large size of the parts produced at this facility and low VOC/HAP content of the paints would result in a large volume of dilute exhaust, making thermal oxidation technologically infeasible.

Carbon adsorption is the process of passing contaminated airstreams through a bed of adsorbent material, typically activated carbon, although other media may be suitable for certain applications. The solvent vapors attach to the surfaces of the activated carbon particles, and the solvent is later desorbed by drawing a vacuum on the sorbent bed or purged using heated air, steam, or nitrogen, allowing collection and recovery of the solvent. This approach is often preferred when the recovered solvent can be reused; if not, the recovered material becomes a waste, and the cost of disposal would add to the costs for this control option. Another drawback of this approach is that the adsorbent typically binds strongly to heavy hydrocarbons and is less effective at capturing lighter weight organics. This means that it may be difficult to desorb some materials that are collected, which can foul the adsorbent over time. Due to these technical limitations,

¹ The faraday cage effect happens when powder coating a part that has a tight angle or corner. Electricity follows a ground path of least resistance. The areas adjacent to the corner offer an easier, more accessible path, and thus the charged powder readily flows to those areas but does not flow as easily to the corners. [information from [Faraday Cage Effect - What is it in Powder Coating? | Prismatic Powders](#)]

this control technique is not considered to be as well suited for the control of VOC and HAP emissions from these spray coating operations.

A refrigerated condenser (RC) is a control device that cools a VOC-laden air stream to condense and remove the VOC. A refrigerated condenser works best on emission streams containing high concentrations of VOC. The main requirements are that the temperature is low enough and that the cooling capacity is sufficient to condense VOC out of the exhaust stream. The amount of VOC vapor that escapes is determined by both the vapor pressure of the condensed liquid (i.e., the partial pressure of the organic vapors in the emission stream) and the amount of air present in the emission stream. Theoretically, in order to achieve the highest level of control efficiency, the exhaust temperature would need to be brought to below the freezing point of the target organic compound. This approach is very energy intensive. As the temperature of the exhaust stream is cooled, the level of VOC is reduced to its dew point. Condensed compounds would then be recovered along with any moisture from the exhaust stream. In the case of the painting operations, the entire volume of the recovered condensate including VOC and water would become an additional waste stream, and the condensate might need to be kept cold and/or pressurized to prevent it from being re-volatilized. For these reasons, the use of a refrigerated condenser is considered technically infeasible for this process.

A trickling bioreactor is similar to a packed-bed wet scrubber, except that the scrubbing solution is a nutrient rich solution flowing through a bed of packing media specifically designed to support an active bacterial population. The bacteria form a “biofilm” on the surfaces of the media, and VOC vapors are absorbed into the solution and taken up in the biofilm. Biological degradation of the VOC produces water and carbon dioxide. In order to be effective, bioreactors need to operate at steady state. Swings in bioreactor loading due to Casco’s batch operations would not be accommodated by this technology. Therefore, this approach is not technologically feasible as BACT.

In a biofilter, the exhaust gas stream is humidified and then passed through a distribution system beneath a bed of compost, bark mulch, or soil containing an active population of bacteria and other microbes much like a trickling bioreactor. As the air stream flows upward through the media, pollutants are adsorbed into the media and converted by microbial metabolism to form carbon dioxide and water. In order to be effective, biofilters typically need to operate at steady state and cannot tolerate extended periods of downtime. Swings in biofilter loading due to Casco’s batch operations would not be readily accommodated by this technology. Therefore, this approach is not technologically feasible as BACT.

An activated sludge reactor uses a basin filled with a slurry of activated sludge, with the exhaust air distributed through bubblers at the bottom. The VOC would dissolve into the liquid, where it would be decomposed by the bacteria in the solution. However, these systems are currently in use primarily for odor control, and no information was found regarding their proven application for the control of VOC from painting of large

steel structures such as bridge components. Therefore, this approach was not considered technically feasible.

BACT for painting operations at Casco is determined to be the use of airless sprayers, fabric filters, painting exclusively indoors, and a 12-month rolling total VOC emissions limit of 39.9 tons.

2. Visible Emissions

The painting operations at Casco are exempt from the requirements of *Visible Emissions Regulation*, 06-096 C.M.R. ch. 101 because it is subject to visible emission requirements under 40 C.F.R. Part 63, Subpart XXXXXX. [06-096 C.M.R. ch. 101, § 1(C)(8)]

The visible emissions requirements of Subpart XXXXXX are addressed in a section below.

The Department finds that BACT for visible emissions from painting operations shall not exceed 10% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 115, BACT]

The Department has determined that the proposed BACT visible emission limit is more stringent than the applicable limit in 40 C.F.R. Part 60, Subpart XXXXXX. Therefore, the visible emission limit for painting operations has been streamlined to the more stringent BACT limit, and only this more stringent limit shall be included in the air emission license.

3. Periodic Monitoring

Periodic monitoring for the painting operations shall include recordkeeping to document spray coating material usage both on a monthly and 12-month rolling total basis. [06-096 C.M.R. ch. 115, BACT]

4. Additional BACT Findings

- a. Casco shall calculate the VOC/HAP emissions from painting operations on a monthly and 12-month rolling total basis according to the material usage and VOC/HAP content of the coating materials according to the material data sheets for each product used. [06-096 C.M.R. ch. 115, BACT]
- b. All cleaning of paint spray guns shall be done with either non-VOC/HAP gun cleaning solvents or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. [06-096 C.M.R. ch. 115, BACT]

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

Casco 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. However, the coatings used at Casco do not contain MFHAP, therefore Casco is not subject to the Standards and Management Practices pertaining to spray painting detailed in Subpart XXXXXX.

6. 06-096 C.M.R. ch. 129: Surface Coating Facilities

Casco 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, Casco is subject to specific emission limits based on the type of coating applied.

- a. Emission Limitations

Actual VOC emissions from the painting operations are expected to exceed 2.7 tons per year. As such, the emission limitations in Section 4 of 06-096 C.M.R. ch. 129 are applicable. Casco 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, and 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 components painted at Casco are air dried, meaning that they are not baked at a temperature at or above 194 °F. Therefore, Casco is limited to using coatings with VOC contents equal to or less than the values in Table 1 below (partially excerpted from 06-096 C.M.R. ch. 129, Section 4(F)(5)), as specified by coating category:

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		
Etching Filler	0.42	3.5
Extreme High-Gloss		
Extreme Performance		
Heat-Resistant		
High Performance Architectural	0.74	6.2
Prefabricated Architectural Multi-Component	0.42	3.5
Prefabricated Architectural One-Component		
Pretreatment Coatings		

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;

[06-096 C.M.R. ch. 129 (4)(F)(5)]

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

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

- (1) Casco 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) Casco 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) Casco 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.

c. Documentation of Method Compliance

Casco 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. 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 Casco use low solvent content coating technology;
- (4) Identification of each coating used and its coating classification;
- (5) The mass of VOC per volume of each coating, excluding water and exempt compounds, as applied; 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 Casco 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).

d. Recordkeeping and Reporting

- (1) Casco 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 Casco shall provide copies to the Department or the Environmental Protection Agency (EPA) upon request.
[06-096 C.M.R. ch. 129 (7)]
- (2) Casco shall submit certification records to the Department of each relevant coating unit, line, or operation, and 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 the spray painting operations at Casco.

- (3) Casco 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, and the total emissions from the surface coating facility.
- (4) Casco 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 the spray painting operations at Casco 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) Casco shall notify the Department if VOC emissions generated at their surface coating facility were in excess of the emission limitations in ch. 129 for:
 - (i) Any exempt surface coating operations that exceeded the applicability threshold in Subsection 1(C) of this chapter; or
 - (ii) 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 06-096 C.M.R. ch. 129, Casco 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 Casco maintains records of such coatings in accordance with Subsection 7(B)(2) of 06-096 C.M.R. ch. 129.

C. Blasting Operations

The primary pollutant of concern from blasting is particulate matter (PM). At Casco, blasting is conducted to etch metal surfaces and is not being used to remove coatings from previously coated metals. This etching process promotes good coating adhesion and corresponding corrosion protection for the steel.

1. BACT Findings

Casco submitted a BACT analysis for control of emissions from the blasting operations at the facility.

For abrasive blasting operations, the control options typically used to minimize emissions fall into two categories: 1) type of blast media used; and 2) capture and

control of blasting debris through the use of enclosures and filters. Casco is currently using two types of low PM-emitting blast media: Maxi-blast is an iron silicate with less than 0.1% free silica, and steel grit is an angular shape media used for aggressive blast applications. Casco currently recycles the steel grit for reuse which also reduces waste. In the next year, Casco will be phasing out Maxi-blast and using only steel grit.

In addition to using low PM-emitting blast media, Casco currently uses the steel grit in a containment area indoors which is vented through an AAF International OptiFlo Dust Collector with a rated control efficiency of 99.99%. The specifications for the OptiFlo dust collector are included in the application for this air emission license. The operations presently using Maxi-blast are conducted in a large enclosure to minimize air flow during the process and contain the Maxi-blast blasting debris. Casco plans to insulate and tighten up the enclosure and install a new dust collector later this year. The facility will also be phasing out the use of Maxi-blast and will be using the steel grit both indoors and in the tent enclosure with a dust collector.

This blasting debris is cleaned routinely to minimize material being tracked outdoors and enable the reuse of the blast media.

BACT for blasting operations at Casco is determined to be the use of low PM emitting blasting media, fabric filters on all enclosures where blasting is being performed, and good housekeeping practices.

2. Visible Emissions

The blasting operations at Casco are exempt from the requirements of *Visible Emissions Regulation*, 06-096 C.M.R. ch. 101 because it is subject to a visible emission standard under 40 C.F.R. Part 63, Subpart XXXXXX.
[06-096 C.M.R. ch. 101, § 1(C)(8)]

The visible emissions requirements of Subpart XXXXXX are addressed in a section below.

The Department finds that BACT for visible emissions from blasting operations shall not exceed 10% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 115, BACT]

The Department has determined that the proposed BACT visible emission limit is more stringent than the applicable limit in 40 C.F.R. Part 60, Subpart XXXXXX. Therefore, the visible emission limit for blasting operations has been streamlined to the more stringent BACT limit, and only this more stringent limit shall be included in the air emission license.

3. Additional BACT Findings

Casco shall:

- a. Install a dust collector to control particulate emissions from the tent enclosure, within a period not to exceed nine months from the date of issuance of this license. Until a dust collector is installed on the tent enclosure, particulate emissions shall be contained and not vented. All other blasting operations shall enclose, capture, and vent emissions through a filtration control device or dust collector;
- b. Operate all equipment associated with dry abrasive blasting operations, including all emissions control equipment, according to manufacturer's instructions. Compliance with this requirement will be demonstrated by maintaining a record of the manufacturer's specifications for each device;
- c. Use proper housekeeping practices in and around blasting operations, including the proper cleaning and disposal of used or spilled materials, sweeping dust and debris routinely to minimize tracking material by moving vehicles or equipment or personnel, as well as the proper storage and handling of unused material and equipment; and
- d. Collect spent materials in proper containers in a manner that prevents extraneous dust and loss of materials until it is disposed of properly.

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

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

Blasting operations at Casco are 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. The specific requirements are covered in the following section.

D. 40 C.F.R. Part 63, Subpart XXXXXX, *Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*

Casco is subject to the 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*. A summary of applicable requirements for blasting, welding, and painting operations is listed below.

1. Standards and Management Practices [40 C.F.R. § 63.11516]
 - a. Standards for Abrasive Blasting in Totally Enclosed and Unvented Blast Chambers
 - (1) Casco shall minimize dust generation during emptying of abrasive blasting enclosures.
 - (2) Casco shall operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.
 - b. Standards for Abrasive Blasting in Vented Blast Chambers
 - (1) Casco shall capture emissions and vent them to a filtration control device. Casco shall operate the filtration control device according to manufacturer's instructions and shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in § 63.11519(c)(4).
 - (2) Casco shall implement the management practices specified below to minimize emissions of MFHAP.
 - (i) Casco shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable.
 - (ii) Casco shall enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials.
 - (iii) Casco shall operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.
 - c. Standards for Abrasive Blasting of Objects with Any One Dimension Greater Than Eight Feet (2.4 meters)
 - (1) For abrasive blasting of objects with any one dimension greater than 8 feet, Casco may implement the below management practices to minimize emissions of MFHAP instead of the practices required by paragraph b. of this section.
 - (i) Take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable.
 - (ii) Enclose abrasive material storage areas and holding bins, seal chutes, and conveyors that transport abrasive material.
 - (iii) Operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

(iv) Do not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size.

(2) Casco shall perform the following visual determinations of fugitive emissions, as specified in § 63.11517(b).

For abrasive blasting of objects greater than 8 feet in any one dimension that is performed indoors, perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations using EPA Method 22.

Visual determinations of fugitive emissions shall be performed in accordance with the following schedule.

(i) Casco shall perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.

(ii) If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests for 10 days of workday operation of the process, Casco may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process. If visible fugitive emissions are detected during these tests, Casco shall resume EPA Method 22 testing of that operation once per day during each day that the process is in operation.

(iii) If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests, Casco may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process. If visible fugitive emissions are detected during these tests, Casco shall resume weekly EPA Method 22 testing.

(iv) If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests, Casco may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process. If visible fugitive emissions are detected during these tests, Casco shall resume monthly EPA Method 22 testing.

[40 C.F.R. § 63.11517]

(3) Casco shall keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in § 63.11519(c)(2).

(4) If visible fugitive emissions are detected, Casco shall perform corrective actions until visible fugitive emissions are eliminated, at which time Casco shall comply with the following requirements:

- (i) Perform a follow-up inspection for visible fugitive emissions in accordance with § 63.11517(a).
- (ii) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with the annual certification and compliance report as required by § 63.11519(b)(5).

d. Standards for Welding

If Casco uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), Casco shall demonstrate that management practices or fume control measures are being implemented by complying with the requirements described below. The requirements listed below do not apply to welding operations that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

- (1) Operate all equipment and capture and control devices associated with welding operations according to manufacturer's instructions. Casco shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in § 63.11519(c)(4).
- (2) Implement one or more of the management practices below to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.
 - (i) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG)).
 - (ii) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates.
 - (iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation.
 - (iv) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated.

- (v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.
- (3) Perform visual determinations of welding fugitive emissions as specified in § 63.11517(b), at the primary vent, stack, exit, or opening from the building containing the welding operations using EPA Method 22. Casco shall keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in § 63.11519(c)(2).

If visible fugitive emissions are detected more than once during any consecutive 12-month period Casco shall perform visual determination of emissions opacity in accordance with EPA Method 9 and according to the following schedule:

- (i) Casco shall Perform visual determination of emissions opacity once per day during each day that the process is in operation.
 - (ii) If the average of the six-minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed does not exceed 20 percent for 10 days of operation of the process, Casco may decrease the frequency of EPA Method 9 testing to once per five days of consecutive workday operation. If opacity greater than 20 percent is detected during any of these tests, Casco shall resume testing every day of operation of the process.
 - (iii) If the average of the six-minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed does not exceed 20 percent for four consecutive weekly tests, Casco may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, Casco shall resume testing every five days of operation of the process.
 - (iv) If the average of the six-minute opacities recorded during any of the consecutive weekly EPA Method 9 tests does not exceed 20 percent for three consecutive monthly tests, Casco may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, Casco shall resume testing every 21 days of operation of the process.
 - (v) If, after two consecutive months of testing, the average of the six-minute opacities recorded during any of the monthly EPA Method 9 tests performed does not exceed 20 percent, Casco may resume EPA Method 22 testing. In lieu of this, Casco may elect to continue performing EPA Method 9 tests.
- [40 C.F.R. § 63.11517]

- (4) Comply with the following requirements if visible fugitive emissions are detected during any visual determination required in the above paragraph:
- (i) Perform corrective actions that include, but are not limited to, inspection of welding fume sources and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented. After completing such corrective actions, perform a follow-up inspection for visible fugitive emissions in accordance with § 63.11517(a), at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (ii) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with the annual certification and compliance report as required by § 63.11519(b)(5).
- (5) For each visual determination of emissions opacity performed for which the average of the six-minute average opacities recorded exceeds 20 percent, Casco shall comply with the following requirements.
- (i) Submit a report of exceedance of 20 percent opacity, along with the annual certification and compliance report, as specified in § 63.11519(b)(8), and according to the requirements of § 63.11519(b)(1).
 - (ii) Within 30 days of the opacity exceedance, prepare and implement a Site-Specific Welding Emissions Management Plan. If Casco has already prepared a Site-Specific Welding Emissions Management Plan, prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
 - (iii) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in § 63.11517(d), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (iv) Maintain records of daily visual determinations of emissions opacity performed during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in § 63.11519(b)(9).
 - (v) Include these records in the annual certification and compliance report, according to the requirements of § 63.11519(b)(1).

- (6) The Site-Specific Welding Emissions Management Plan shall comply with the following requirements.
 - (i) The Site-Specific Welding Emissions Management Plan shall contain the following information.
 - A. Company name and address;
 - B. A list and description of all welding operations which currently comprise the welding affected source;
 - C. A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
 - D. A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
 - E. A description of additional management practices and/or fume control methods to be implemented, and the projected date of implementation; and
 - F. Any revisions to a Site-Specific Welding Emissions Management Plan shall contain copies of all previous plan entries.
 - (ii) The Site-Specific Welding Emissions Management Plan shall be updated annually to contain current information, and submitted with the annual certification and compliance report, according to the requirements of § 63.11519(b)(1).
 - (iii) Casco shall maintain a copy of the current Site-Specific Welding Emissions Management Plan in a readily accessible location for inspector review, in accordance with the requirements in § 63.11519(c)(12).

2. Notification and Reporting Requirements [40 C.F.R. § 63.11519]

- a. An Initial Notification is required to be submitted no later than July 25, 2011. [40 C.F.R. § 63.11519 (a)]

Casco shall submit the Initial Notification immediately upon the issuance of this air emission license. “Immediately” shall be considered as soon as practicable but no later than 30 days from the date of issuance of this license.

The Initial Notification shall provide the following information:

- (1) The name, address, phone number, and e-mail address of the owner and operator;
 - (2) The address (physical location) of the affected source;
 - (3) An identification of the relevant standard (i.e., 40 C.F.R. Part 63, Subpart XXXXXX); and
 - (4) A brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.
- b. A Notification of Compliance Status was required to be submitted on or before November 22, 2011. [40 C.F.R. § 63.11519 (2)]

Casco shall submit the Notification of Compliance Status immediately upon the issuance of this air emission license. "Immediately" shall be considered as soon as practicable but no later than 30 days from the date of issuance of this license.

The Notification of Compliance Status shall provide the following information:

- (1) The company's name and address;
 - (2) A statement by a responsible official with that official's name, title, phone number, e-mail address, and signature certifying the truth, accuracy, and completeness of the notification; and a statement of whether the source has complied with all the relevant standards and other requirements of 40 C.F.R. Part 63, Subpart XXXXXX;
 - (3) If the facility operated any spray painting affected sources, the information required by § 63.11516(e)(3)(vi)(C), or § 63.11516(e)(4)(ix)(C), as applicable; and
 - (4) The date of the notification of compliance status.
- c. Casco shall prepare and submit an annual certification and compliance report to the Department and EPA according to the following:
- (1) The report shall be prepared and submitted according to the following dates. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

- (i) The first annual certification and compliance report for this facility shall cover the period starting the date this air emission license is issued and ending on December 31, 2021.
 - (ii) Each subsequent annual certification and compliance report shall cover the subsequent annual reporting period from January 1 through December 31.
 - (iii) Each annual certification and compliance report shall be prepared and submitted no later than January 31 and kept in a readily accessible location for inspector review. If an exceedance has occurred during the year, each exceedance report shall be submitted with the annual certification and compliance report and postmarked or delivered no later than January 31.
- (2) The annual certification and compliance report shall contain the following information:
- (i) Company name and address;
 - (ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation;
 - (iv) Records of EPA Method 22 testing as denoted below:
 - A. The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
 - B. A description of the corrective actions taken subsequent to the test; and
 - C. The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.
 - (v) Records of EPA Method 9 testing as denoted below:
 - A. The date of every visual determination of emissions opacity;
 - B. The average of the six-minute opacities measured by the test; and
 - C. A description of any corrective action taken subsequent to the test.

- d. As required by § 63.11516(f)(7)(i), Casco shall prepare an exceedance report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity from welding operations exceeds 20 percent. This report shall be submitted along with the annual certification and compliance report and contain the following information.
 - (1) The date on which the exceedance occurred; and
 - (2) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.
 - e. Casco shall submit a copy of the records of daily visual determinations of emissions recorded in accordance with § 63.11516(f)(7)(iv), and a copy of the Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to § 63.11516(f)(8), along with the annual certification and compliance report.
3. Recordkeeping Requirements [40 C.F.R. § 63.11519]
- Casco shall collect and keep records of data and information according to the below paragraphs:
- a. Compliance and Applicability Records
 - (1) Each notification and report that was submitted to comply with this subpart, and the documentation supporting each notification and report.
 - (2) Records of the applicability determinations as in § 63.11514(b)(1) through (5), listing equipment included in its affected source, as well as any changes to that and on what date they occurred, shall be maintained for 5 years and be made available for inspector review at any time.
 - b. Visual Determination of Fugitive Emissions Records
 - (1) The date and results of every visual determination of fugitive emissions;
 - (2) A description of any corrective action taken subsequent to the test; and
 - (3) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
 - c. Visual Determination of Emissions Opacity Records
 - (1) The date of every visual determination of emissions opacity;

- (2) The average of the six-minute opacities measured by the test; and
- (3) A description of any corrective action taken subsequent to the test.
- d. Casco shall maintain a record of the manufacturer's specifications for the control devices used to comply with § 63.11516.
- e. Casco shall maintain copies of manufacturer's instructions for operation of equipment, readily available for inspector review.
- f. Casco shall maintain records demonstrating welding rod usage on a 12-month rolling total basis.
- g. Casco shall maintain records according to the following requirements:
 - (1) Records shall be in a form suitable and readily available for expeditious review, according to § 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
 - (2) Casco shall keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
 - (3) Casco shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to § 63.10(b)(1). Casco may keep the records off-site for the remaining 3 years.

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

Casco uses industrial cleaning solvents in cleaning activities as those terms are defined in *Industrial Cleaning Solvents, 06-096 C.M.R. ch. 166*. Those cleaning activities include cleaning paint sprayers and other painting equipment.

Casco is exempt from the requirement of the rule per Section (3)(A)(8); however, in order to maintain this exemption, Casco shall maintain the records required of 06-096 C.M.R. ch. 129 listed above for a period of 5 years.

[06-096 C.M.R. ch. 166, §§ 5(A) and (D)]

F. Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity on a five-minute block average basis.

[06-096 C.M.R. ch. 101(3)(C)]

G. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101(3)(B)(4)]

H. Emission Statements

Casco is subject to emissions inventory requirements contained in *Emission Statements*, 06-096 C.M.R. ch. 137. Casco shall maintain records of calculated VOC and HAP emissions from the painting operations on a monthly and calendar year total basis and report them in accordance with this rule.

In reporting year 2023 and every third year thereafter, Casco 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. Casco 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)]

I. 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:

- A facility-wide VOC limit of 39.9 tpy.

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
Painting Operations	--	--	--	--	--	39.9
Total TPY	--	--	--	--	--	39.9

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

III. AMBIENT AIR QUALITY ANALYSIS

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

Pollutant	Tons/Year
PM 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-1154-71-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. § 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 the written test report by the Department, or another alternative timeframe approved by the Department, 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 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]
- (16) The licensee 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). [06-096 C.M.R. ch. 115]

SPECIFIC CONDITIONS

(17) **Painting Operations**

- A. Casco shall keep records of the type and amount of spray coating materials used, both on a monthly and 12-month rolling total basis. [06-096 C.M.R. ch. 115, BACT]
- B. VOC emissions from Casco's painting operations shall not exceed 39.9 tons per year, on a 12-month rolling total basis. [06-096 C.M.R. ch. 115, BACT]
- C. HAP emissions shall not exceed 9.9 tons per year of a single HAP or 24.9 tons per year of total HAP, on a 12-month rolling total basis. [06-096 C.M.R. ch. 115, BACT]

- D. Casco shall calculate the VOC and HAP emissions totals from painting operations on a monthly and 12-month rolling total basis according to the material usage and VOC/HAP content of the material used according to the material data sheets for each product used. [06-096 C.M.R. ch. 115, BACT]
- E. All painting operations at the Casco facility shall be conducted inside an enclosed space. [06-096 C.M.R. ch. 115, BACT]
- F. Fabric filters with associated air handlers shall be installed and maintained in all enclosures where painting operations occur. [06-096 C.M.R. ch. 115, BACT]
- G. Casco shall exclusively use airless spray painting for all painting operations. [06-096 C.M.R. ch. 115, BACT]
- H. All cleaning of paint spray guns shall be done with either non-VOC/HAP gun cleaning solvents or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. [06-096 C.M.R. ch. 115, BACT]
- I. Visible emissions from painting operations shall not exceed 10% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 115, BACT]
- J. 06-096 C.M.R. ch. 129 (Chapter 129)
1. Casco 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 painting operations. [06-096 C.M.R. ch. 129]
 2. Casco shall submit a document to the Department certifying that they are utilizing Control Option 1 to meet the applicable VOC limits established in Chapter 129. The document shall include:
 - a. Name and location of surface coating facility;
 - b. Name, address, and telephone number of the person responsible for the surface coating facility;
 - c. A declaration stating that all coatings applied at Casco use low solvent content coating technology;
 - d. Identification of each coating used in painting operations and its coating classification;

- e. The mass of VOC per volume of each coating, excluding water and exempt compounds, as applied, used each day in painting operations; and
 - f. 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)]
3. Casco 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 Casco maintains records of such coatings in accordance with Subsection 7(B)(2) of Chapter 129. [06-096 C.M.R. ch. 129(4)(G)]
4. Casco 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, partially 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		
Etching Filler	0.42	3.5
Extreme High-Gloss		
Extreme Performance		
Heat-Resistant		
High Performance Architectural	0.74	6.2
Prefabricated Architectural Multi-Component	0.42	3.5
Prefabricated Architectural One-Component		
Pretreatment Coatings		

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:

- a. Stencil coatings;
- b. Safety-indicating coatings.

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)]

5. Casco shall comply with the work practice standards contained in Section 5 of 06-096 C.M.R. ch. 129, which include the following:
 - a. 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)]
 - b. 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)]
 - c. 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)]
 - d. 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)]
6. 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 Casco shall provide copies to the Department or the EPA upon request. [06-096 C.M.R. ch. 129 (7)]
7. 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 painting operations. [06-096 C.M.R. ch. 129 (7)(A)]
8. 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 the painting operations at Casco. [06-096 C.M.R. ch. 129 (7)(B)(2)]
9. 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 painting operations at Casco 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)]
10. Notify the Department if VOC emissions generated at their facility were in excess of the emission limitations in chapter 129 for:
 - a. Exempt surface coating operations that exceeded the applicability threshold in Subsection 1(C) of this chapter; or

- b. For painting operations, 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)]

(18) Blasting Operations

- A. Casco shall exclusively use low PM emitting blasting media.
[06-096 C.M.R. ch. 115, BACT]
- B. Visible emissions from blasting operations shall not exceed 10% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 115, BACT]
- C. Casco shall use proper housekeeping practices in and around blasting operations, 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, BACT]
- D. Install a dust collector to control particulate emissions from the tent enclosure, within a period not to exceed nine months from the date of issuance of this license. Until a dust collector is installed on the tent enclosure, particulate emissions shall be contained and not vented. All other blasting operations shall enclose, capture, and vent emissions through a filtration control device or dust collector. [06-096 C.M.R. ch. 115, BACT]
- E. Operate all equipment associated with dry abrasive blasting operations, including all emissions control equipment, according to manufacturer's instructions. Compliance with this requirement will be demonstrated by maintaining a record of the manufacturer's specifications for each device. [06-096 C.M.R. ch. 115, BACT]
- F. Use proper housekeeping practices in and around blasting operations, including the proper cleaning and disposal of used or spilled materials, sweeping dust and debris routinely to minimize tracking material by moving vehicles or equipment or personnel, as well as the proper storage and handling of unused material and equipment. [06-096 C.M.R. ch. 115, BACT]
- G. Collect spent materials in proper containers in a manner that prevents extraneous dust and loss of materials until it is disposed of properly. [06-096 C.M.R. ch. 115, BACT]

(19) **40 C.F.R. Part 63, Subpart XXXXXX**

A. Standards and Management Practices [40 C.F.R. § 63.11516]

1. Standards for Abrasive Blasting in Totally Enclosed and Unvented Blast Chambers
 - a. Casco shall minimize dust generation during emptying of abrasive blasting enclosures.
 - b. Casco shall operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.
2. Standards for Abrasive Blasting in Vented Blast Chambers
 - a. Casco shall capture emissions and vent them to a filtration control device. Casco shall operate the filtration control device according to manufacturer's instructions and shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in § 63.11519(c)(4).
 - b. Casco shall implement the management practices specified below to minimize emissions of MFHAP.
 - (1) Casco shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable.
 - (2) Casco shall enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials.
 - (3) Casco shall operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.
3. Standards for Abrasive Blasting of Objects with Any One Dimension Greater Than Eight Feet (2.4 meters)
 - a. For abrasive blasting of objects with any one dimension greater than 8 feet, Casco may implement the below management practices to minimize emissions of MFHAP instead of the practices required by paragraph b. of this section.
 - (1) Take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable.
 - (2) Enclose abrasive material storage areas and holding bins, seal chutes, and conveyors that transport abrasive material.

- (3) Operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.
 - (4) Do not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size.
- b. Casco shall perform the following visual determinations of fugitive emissions, as specified in § 63.11517(b).

For abrasive blasting of objects greater than 8 feet in any one dimension that is performed indoors, perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations using EPA Method 22.

Visual determinations of fugitive emissions shall be performed in accordance with the following schedule.

- (1) Casco shall perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.
- (2) If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests for 10 days of workday operation of the process, Casco may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process. If visible fugitive emissions are detected during these tests, Casco shall resume EPA Method 22 testing of that operation once per day during each day that the process is in operation.
- (3) If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests, Casco may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process. If visible fugitive emissions are detected during these tests, Casco shall resume weekly EPA Method 22 testing.
- (4) If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests, Casco may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process. If visible fugitive emissions are detected during these tests, Casco shall resume monthly EPA Method 22 testing.

[40 C.F.R. § 63.11517]

- c. Casco shall keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in § 63.11519(c)(2).

d. If visible fugitive emissions are detected, Casco shall perform corrective actions until visible fugitive emissions are eliminated, at which time Casco shall comply with the following requirements:

- (1) Perform a follow-up inspection for visible fugitive emissions in accordance with § 63.11517(a).
- (2) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with the annual certification and compliance report as required by § 63.11519(b)(5).

4. Standards for Welding

If Casco uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), Casco shall demonstrate that management practices or fume control measures are being implemented by complying with the requirements described below. The requirements listed below do not apply to welding operations that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

- a. Operate all equipment and capture and control devices associated with welding operations according to manufacturer's instructions. Casco shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in § 63.11519(c)(4).
- b. Implement one or more of the management practices below to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.
 - (1) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG)).
 - (2) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates.
 - (3) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation.
 - (4) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated.

- (5) Use a welding fume capture and control system, operated according to the manufacturer's specifications.
- c. Perform visual determinations of welding fugitive emissions as specified in § 63.11517(b), at the primary vent, stack, exit, or opening from the building containing the welding operations using EPA Method 22. Casco shall keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in § 63.11519(c)(2).

If visible fugitive emissions are detected more than once during any consecutive 12-month period Casco shall perform visual determination of emissions opacity in accordance with EPA Method 9 and according to the following schedule:

- (1) Casco shall Perform visual determination of emissions opacity once per day during each day that the process is in operation.
- (2) If the average of the six-minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed does not exceed 20 percent for 10 days of operation of the process, Casco may decrease the frequency of EPA Method 9 testing to once per five days of consecutive workday operation. If opacity greater than 20 percent is detected during any of these tests, Casco shall resume testing every day of operation of the process.
- (3) If the average of the six-minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed does not exceed 20 percent for four consecutive weekly tests, Casco may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, Casco shall resume testing every five days of operation of the process.
- (4) If the average of the six-minute opacities recorded during any of the consecutive weekly EPA Method 9 tests does not exceed 20 percent for three consecutive monthly tests, Casco may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, Casco shall resume testing every 21 days of operation of the process.
- (5) If, after two consecutive months of testing, the average of the six-minute opacities recorded during any of the monthly EPA Method 9 tests performed does not exceed 20 percent, Casco may resume EPA Method 22 testing. In lieu of this, Casco may elect to continue performing EPA Method 9 tests.
[40 C.F.R. § 63.11517]

- d. Comply with the following requirements if visible fugitive emissions are detected during any visual determination required in the above paragraph:
- (1) Perform corrective actions that include, but are not limited to, inspection of welding fume sources and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented. After completing such corrective actions, perform a follow-up inspection for visible fugitive emissions in accordance with § 63.11517(a), at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (2) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with the annual certification and compliance report as required by § 63.11519(b)(5).
- e. For each visual determination of emissions opacity performed for which the average of the six-minute average opacities recorded exceeds 20 percent, Casco shall comply with the following requirements.
- (1) Submit a report of exceedance of 20 percent opacity, along with the annual certification and compliance report, as specified in § 63.11519(b)(8), and according to the requirements of § 63.11519(b)(1).
 - (2) Within 30 days of the opacity exceedance, prepare and implement a Site-Specific Welding Emissions Management Plan. If Casco has already prepared a Site-Specific Welding Emissions Management Plan, prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
 - (3) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in § 63.11517(d), using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - (4) Maintain records of daily visual determinations of emissions opacity performed during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in § 63.11519(b)(9).
 - (5) Include these records in the annual certification and compliance report, according to the requirements of § 63.11519(b)(1).

- f. The Site-Specific Welding Emissions Management Plan shall comply with the following requirements.
- (1) The Site-Specific Welding Emissions Management Plan shall contain the following information.
 - (i) Company name and address;
 - (ii) A list and description of all welding operations which currently comprise the welding affected source;
 - (iii) A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
 - (iv) A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
 - (v) A description of additional management practices and/or fume control methods to be implemented, and the projected date of implementation; and
 - (vi) Any revisions to a Site-Specific Welding Emissions Management Plan shall contain copies of all previous plan entries.
 - (2) The Site-Specific Welding Emissions Management Plan shall be updated annually to contain current information, and submitted with the annual certification and compliance report, according to the requirements of § 63.11519(b)(1).
 - (3) Casco shall maintain a copy of the current Site-Specific Welding Emissions Management Plan in a readily accessible location for inspector review, in accordance with the requirements in § 63.11519(c)(12).

B. Notification and Reporting Requirements [40 C.F.R. § 63.11519]

1. Casco shall submit an Initial Notification immediately upon the issuance of this air emission license. “Immediately” shall be considered as soon as practicable but no later than 30 days from the date of issuance of this license.
[40 C.F.R. § 63.11519 (a)]

The Initial Notification shall provide the following information:

- a. The name, address, phone number, and e-mail address of the owner and operator;

- b. The address (physical location) of the affected source;
 - c. An identification of the relevant standard (i.e., 40 C.F.R. Part 63, Subpart XXXXXX); and
 - d. A brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.
2. Casco shall submit a Notification of Compliance Status immediately upon the issuance of this air emission license. "Immediately" shall be considered as soon as practicable but no later than 30 days from the date of issuance of this license. [40 C.F.R. § 63.11519 (2)]

The Notification of Compliance Status shall provide the following information:

- a. The company's name and address;
 - b. A statement by a responsible official with that official's name, title, phone number, e-mail address, and signature certifying the truth, accuracy, and completeness of the notification; and a statement of whether the source has complied with all the relevant standards and other requirements of 40 C.F.R. Part 63, Subpart XXXXXX;
 - c. If the facility operated any spray painting affected sources, the information required by § 63.11516(e)(3)(vi)(C), or § 63.11516(e)(4)(ix)(C), as applicable; and
 - d. The date of the notification of compliance status.
3. Casco shall prepare and submit an annual certification and compliance report to the Department and EPA according to the following:
- a. The report shall be prepared and submitted according to the following dates. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 - (1) The first annual certification and compliance report for this facility shall cover the period starting the date this air emission license is issued and ending on December 31, 2021.
 - (2) Each subsequent annual certification and compliance report shall cover the subsequent annual reporting period from January 1 through December 31.

- (3) Each annual certification and compliance report shall be prepared and submitted no later than January 31 and kept in a readily accessible location for inspector review. If an exceedance has occurred during the year, each exceedance report shall be submitted with the annual certification and compliance report and postmarked or delivered no later than January 31.
 - b. The annual certification and compliance report shall contain the following information:
 - (1) Company name and address;
 - (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - (3) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation;
 - (4) Records of EPA Method 22 testing as denoted below:
 - (i) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
 - (ii) A description of the corrective actions taken subsequent to the test; and
 - (iii) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.
 - (5) Records of EPA Method 9 testing as denoted below:
 - (i) The date of every visual determination of emissions opacity;
 - (ii) The average of the six-minute opacities measured by the test; and
 - (iii) A description of any corrective action taken subsequent to the test.
4. As required by § 63.11516(f)(7)(i), Casco shall prepare an exceedance report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity from welding operations exceeds 20 percent. This report shall be submitted along with the annual certification and compliance report and contain the following information.

- a. The date on which the exceedance occurred; and
 - b. The average of the six-minute average opacities recorded during the visual determination of emissions opacity.
5. Casco shall submit a copy of the records of daily visual determinations of emissions recorded in accordance with § 63.11516(f)(7)(iv), and a copy of the Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to § 63.11516(f)(8), along with the annual certification and compliance report.

C. Recordkeeping Requirements [40 C.F.R. § 63.11519]

Casco shall collect and keep records of data and information according to the below paragraphs:

1. Compliance and Applicability Records

- a. Each notification and report that was submitted to comply with this subpart, and the documentation supporting each notification and report.
- b. Records of the applicability determinations as in § 63.11514(b)(1) through (5), listing equipment included in its affected source, as well as any changes to that and on what date they occurred, shall be maintained for 5 years and be made available for inspector review at any time.

2. Visual Determination of Fugitive Emissions Records

- a. The date and results of every visual determination of fugitive emissions;
- b. A description of any corrective action taken subsequent to the test; and
- c. The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.

3. Visual Determination of Emissions Opacity Records

- a. The date of every visual determination of emissions opacity;
- b. The average of the six-minute opacities measured by the test; and
- c. A description of any corrective action taken subsequent to the test.

4. Casco shall maintain a record of the manufacturer's specifications for the control devices used to comply with § 63.11516.

5. Casco shall maintain copies of manufacturer's instructions for operation of equipment, readily available for inspector review.
6. Casco shall maintain records demonstrating welding rod usage on a 12-month rolling total basis.
7. Casco shall maintain records according to the following requirements:
 - a. Records shall be in a form suitable and readily available for expeditious review, according to § 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
 - b. Casco shall keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
 - c. Casco shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to § 63.10(b)(1). Casco may keep the records off-site for the remaining 3 years.

(20) **Industrial Cleaning Solvents**

Casco is exempt from the requirement of the rule per Section (3)(A)(8), however in order to maintain this exemption, Casco shall maintain the records required of 06-096 C.M.R. ch. 129 listed above for a period of 5 years.
[06-096 C.M.R. ch. 166, §§ 5(A) and (D)]

(21) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity on a five-minute block average basis.
[06-096 C.M.R. ch. 101(3)(C)]

(22) **General Process Sources**

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101(3)(B)(4)]

(23) **Annual Emission Statements**

A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, Casco 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. Casco shall keep records of the calculations of VOC and HAP emissions from the painting operations on a calendar year total basis in order to comply with 06-096 C.M.R. ch. 137. [06-096 C.M.R. ch. 137]
- C. Beginning with reporting year 2023 and every third year thereafter, Casco shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). Casco 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)]

DONE AND DATED IN AUGUSTA, MAINE THIS 22nd DAY OF APRIL, 2021.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, 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: 10/26/20

Date of application acceptance: 11/17/20

Date filed with the Board of Environmental Protection:

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

