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

DEPARTMENT ORDER

Hussey Seating Company **York County** **North Berwick, Maine** **A-374-71-M-R/M**	**Departmental** **Findings of Fact and Order** **Air Emission License** **Renewal / Minor Revision**

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

Hussey Seating Company (Hussey) has applied to renew Air Emission License for the operation of emission sources associated with their spectator seating manufacturing facility.

Hussey has also requested a minor revision to their license to remove equipment associated with the woodworking and the hand spray coater #1 operations. Additionally, Hussey has added other new equipment to their facility that does not meet the minimum threshold for inclusion in the air license but has requested that it be listed for purposes of completeness.

The equipment addressed in this license renewal and minor revision is located at 38 Dyer Street Ext., North Berwick, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license renewal / minor revision:

Boilers, Heaters and Ovens

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (scf/hr)	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Boiler B-3	1.33	1,291	Natural Gas	Unknown	Unknown	B-3
Boiler B-4	1.33	1,291	Natural Gas	Unknown	Unknown	B-4
First Stage Washer Heater	6.0	5,825	Natural Gas	Unknown	Unknown	P2
Heater #9	2.0	1,942	Natural Gas	Unknown	Unknown	None

Boilers, Heaters and Ovens (continued)

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (scf/hr)	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Heater #19	4.13	4,000	Natural Gas	Unknown	Unknown	None
Heater #23	1.46	1,417	Natural Gas	Unknown	Unknown	None
Burn-Off Oven #10	1.0	971	Natural Gas	Unknown	Unknown	P10
Small Parts Cure Oven	1.2	1,165	Natural Gas	Unknown	Unknown	P6
Dry-Off Oven	2.4	2,330	Natural Gas	Unknown	Unknown	P5

Generators

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (HP)	Fuel Type	Firing Rate (scf/hr)	Date of Manuf.	Date of Install.
Emergency Generator #1	0.50	71	Natural Gas	488	2008	2009
*Emergency Generator #2 **	*0.23*	*33*	*Natural Gas*	*225*	*Unknown*	*Unknown*
*Emergency Generator #3**	*0.14*	*20*	*Natural Gas*	*136*	*Unknown*	*Unknown*
*Emergency Generator #4**	*0.29*	*41*	*Natural Gas*	*270*	*2015*	*2015*

* - *Insignficant due to their sizes, listed for informational purposes only*

Fire Pumps

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (HP)	Fuel Type, % Sulfur	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.
Perkins Fire Pump	1.04	148	Distillate Fuel, 0.0015%	7.6	Pre-2006	Pre-2006
Cummins Fire Pump	1.01	144	Distillate Fuel, 0.0015%	7.4	Pre-2006	Pre-2006

Process Equipment

Emission Unit ID	Type Of Equipment	Maximum Raw Material Process Rate	Date of Manuf	Date of Install	Stack #	Control Device
Hand Spray Coater No. 2	Hand Sprayer	5.19 gal/hr	Unknown	Unknown	P7	Spray Booth with Fabric Filters
Hand Spray Coater No. 3	Hand Sprayer	5.19 gal/hr	Unknown	Unknown	P8	Spray Booth with Fabric Filters
Welding (12 Manual and 7 Robotic)	Welding	37,980 lb/yr of Welding Wire	Unknown	Unknown	None	DC8 Air Filtration Unit and Bench Filtration Units Discharge Inside
Welding (6 manual; 2 operating daily and 4 operating intermittently)	Welding	Unknown	Unknown	Unknown	W10 through W15	None
Powder Coat Finishing Operation	Automated Sprayers	72.5 lb/hr	Unknown	Unknown	None	None
Plasma Cutter Downdraft Table	Plasma Cutter	N/A	Unknown	2015	None	Torit Collector with Fabric Filters

C. Definitions

Distillate Fuel - For the purposes of this license, *distillate fuel* means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;
- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

Insignificant Emission Equipment – For the purposes of this license, *insignificant emission equipment* means fuel burning equipment that does not meet the minimum threshold for inclusion of their emission contributions into the air license emission calculations. For the reciprocating internal combustion engines at Hussey, the threshold is 0.50 MMBtu/hr of minimum heat input value.
[06-096 C.M.R. ch. 115 § (1)(B)(2)]

D. Application Classification

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

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

With the volatile organic compound (VOC) limits associated with the Hand Spray Coating Operations and the operating hours restriction on the Emergency Generator #1 and the two emergency fire pumps, the facility is licensed as follows:

- As a synthetic minor source of air emissions, because the licensed emissions are below the major source thresholds for criteria pollutants; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

The addition of insignificant equipment and the removal of obsolete equipment from this air license does not result in increased emissions of any pollutant from the facility. Therefore, this amendment is determined to be a minor revision and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

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

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

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

B. Boilers, Heaters and Ovens

Hussey operates Boilers B-3 and B-4 for heat. Each boiler is rated at 1.33 MMBtu/hr, fires natural gas and exhausts through its own individual stack.

The heaters and ovens at Hussey are used to support the processes they use to manufacture their spectator seating products. None of the heaters or ovens is used to generate steam. They all fire natural gas, and each unit exhausts through its own individual point or stack.

1. BPT Findings for the Boilers, Heaters and Ovens

The BPT emission limits for the boilers, heaters and ovens were based on the following:

Natural Gas

PM/PM_{10}	–	7.6 lb/MMscf, based on air license A-374-71-L-R/A dated March 22, 2012, BPT
SO_2	–	0.6 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
NO_x	–	100 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
CO	–	84 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
VOC	–	5.5 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
Visible Emissions	–	06-096 C.M.R. ch. 115, BPT

The BPT emission limits for the boilers, heaters and ovens, all firing natural gas, are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler B-3 Natural Gas	0.01	0.01	0.001	0.13	0.11	0.01
Boiler B-4 Natural Gas	0.01	0.01	0.001	0.13	0.11	0.01
First Stage Washer Heater	0.04	0.04	0.01	0.58	0.49	0.03
Heater #9	0.02	0.02	0.01	0.19	0.16	0.01
Heater #19	0.03	0.03	0.01	0.40	0.34	0.02
Heater #23	0.01	0.01	0.01	0.14	0.12	0.01
Burn-Off Oven #10	0.01	0.01	0.01	0.10	0.08	0.01
Small Parts Cure Oven	0.01	0.01	0.01	0.12	0.10	0.01
Dry-Off Oven	0.02	0.02	0.01	0.23	0.20	0.01

Visible emissions from the each of the boilers, heaters and ovens shall not exceed 10% opacity on a six-minute block average basis.

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

   Due to their individual sizes, Boilers B-3 and B-4 are not subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr manufactured after June 9, 1989. [40 C.F.R. § 60.40c]

   The First Stage Washer Heater, Heater #9, Heater #19, Heater #23, the Burn-Off Oven #10, the Small Parts Cure Oven and the Dry-Off Oven are not subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* 40 C.F.R. Part 60, Subpart Dc, because they are not steam generating units.

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

   All of the boilers, heaters and ovens utilized at Hussey fire natural gas. Therefore, none of this equipment is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJJ. [40 C.F.R. § 63.11195e]

C. Emergency Generator #1

Emergency generators are generator sets, each consisting of an engine coupled with an electrical generator. Hussey operates four emergency generators, three of which are considered insignificant due to their sizes. Only Emergency Generator #1 meets the minimum size requirements for inclusion in this air license. Because they are insignificant by definition, Emergency Generators #2, #3 and #4 will not be addressed further in this license. However, they are still subject to the applicable federal requirements. Emergency Generator #1 has a four stroke engine rated at 0.5 MMBtu/hr, fires natural gas, and was manufactured in 2008.

1. BPT Findings

The BPT emission limits for Emergency Generator #1 are based on the following:

PM/PM_{10}	- 0.0095 lb/MMBtu from AP-42 Table 3.2.3 dated 07/00
SO_2	- combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
NO_x	- 12.28 lb/MMBtu, from Air License A-374-71-L-R/A dated March 22, 2012, based on Manufacturer's Exhaust Emission Data
CO	- 2.24 lb/MMBtu, from Air License A-374-71-L-R/A dated March 22, 2012, based on Manufacturer's Exhaust Emission Data
VOC	- 0.54 lb/MMBtu, from Air License A-374-71-L-R/A dated March 22, 2012, based on Manufacturer's Exhaust Emission Data
Visible Emissions	- 06-096 C.M.R. ch. 115, BPT

The BPT emission limits for Emergency Generator #1 are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Emergency Generator #1 0.50 MMBtu/hr Natural Gas	0.01	0.01	0.01	6.14	1.12	0.27

Visible emissions from the natural gas fired Emergency Generator #1 shall not exceed 10% opacity on a six-minute block average basis.

2. 40 C.F.R. Part 60, Subpart JJJJ

Emergency Generator #1 was manufactured in December of 2008. Therefore, the engine is not subject to the New Source Performance Standards (NSPS) *Standards of Performance for Spark Ignition Internal Combustion Engines (SI ICE),* 40 C.F.R. Part 60, Subpart JJJJ since the unit was manufactured before January 1, 2009. [40 C.F.R. § 60.4230]

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

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63, Subpart ZZZZ is applicable to Emergency Generator #1, as well as Emergency Generators #2, #3, and #4. The units are considered existing, emergency stationary reciprocating internal combustion engines at an area HAP source and are not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE*) specifically does not exempt these units from the federal requirements. [40 C.F.R. § 63.6585]

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 63, Subpart ZZZZ, a stationary reciprocating internal combustion engine (RICE) is considered an **emergency** stationary RICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under 40 C.F.R. Part 63, Subpart ZZZZ, resulting in the engine being subject to requirements applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster or equipment failure;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

(i) An emergency engine may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that

the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE more than 100 hours per calendar year.

(ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

Emergency Generator #1 shall be limited to the usage outlined in 40 C.F.R. § 63.6640(f) and therefore may be classified as an existing emergency stationary RICE as defined in 40 C.F.R. Part 63, Subpart ZZZZ. Failure to comply with all of the requirements listed in 40 C.F.R. § 63.6640(f) may cause this engine to not be considered an emergency engine and therefore subject to all applicable requirements for non-emergency engines.

b. 40 C.F.R. Part 63, Subpart ZZZZ Requirements

(1) Operation and Maintenance Requirements
(40 C.F.R. § 63.6603(a) and Table 2(d))

	Operating Limitations
Spark ignition (natural gas) units: **Emergency Generator #1**	- Change oil and filter every 500 hours of operation or annually, whichever comes first; - Inspect spark plugs every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and - Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The engine shall be operated and maintained according to the manufacturer's emission-related written instructions, or Hussey shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
[40 C.F.R. § 63.6625(e)]

(2) Optional Oil Analysis Program
Hussey has the option of utilizing an oil analysis program which complies with the requirements of § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, Hussey must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 C.F.R. § 63.6625(i)]

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 63.6625(f)]

(4) Startup Idle and Startup Time Minimization Requirements
During periods of startup the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [40 C.F.R. § 63.6625(h) and 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(5) Annual Time Limit for Maintenance and Testing
As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). [40 C.F.R. § 63.6640(f)]

(6) Recordkeeping
Hussey shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 63.6655(f)]

D. Fire Pumps

Hussey operates two fire pumps at their facility. The Perkins Fire Pump has an engine rated at 1.04 MMBtu/hr, and the Cummins Fire Pump has an engine rated at 1.01 MMBtu/hr. Both fire pumps fire distillate fuel, and each fire pump was manufactured and installed prior to 2006.

1. BPT Findings

The BPT emission limits for the fire pump engines are based on the following:

PM/PM_{10}	- 0.31 lb/MMBtu from AP-42, Table 3.3-1 dated 10/96
SO_2	- combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
NO_x	- 4.41 lb/MMBtu from AP-42, Table 3.3-1 dated 10/96
CO	- 0.95 lb/MMBtu from AP-42, Table 3.3-1 dated 10/96
VOC	- 0.36 lb/MMBtu from AP-42, Table 3.3-1 dated 10/96
Visible Emissions	- 06-096 C.M.R. ch. 115, BPT

The BPT emission limits for the two fire pump engines are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Perkins Fire Pump 1.04MMBtu/hr Distillate fuel, 0.0015%	0.32	0.32	0.01	4.59	0.99	0.37
Cummins Fire Pump 1.01MMBtu/hr Distillate fuel, 0.0015%	0.31	0.31	0.01	4.45	0.96	0.36

Visible emissions from each of the distillate fuel-fired fire pump engines shall not exceed 20% opacity on a six-minute block average basis.

2. New Source Performance Standards (NSPS)

Both fire pumps were ordered prior to July 11, 2005 and manufactured before April 1, 2006. Therefore, they are not subject to the New Source Performance Standards (NSPS) Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE), 40 C.F.R. Part 60, Subpart IIII since the units were manufactured prior to April 1, 2006. [40 C.F.R. § 60.4200]

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

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63, Subpart ZZZZ is applicable to the emergency fire pump engines listed above. The units are considered existing, emergency stationary reciprocating internal combustion engines at an area HAP source and are not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE*) specifically does not exempt these units from the federal requirements. [40 C.F.R. § 63.6585]

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 63, Subpart ZZZZ, a stationary reciprocating internal combustion engine (RICE) is considered an **emergency** stationary RICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under 40 C.F.R. Part 63, Subpart ZZZZ, resulting in the engine being subject to requirements applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster or equipment failure;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

(i) An emergency engine may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that

the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE more than 100 hours per calendar year.

(ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

The Perkins and the Cummins fire pumps shall be limited to the usage outlined in 40 C.F.R. § 63.6640(f) and therefore may be classified as existing emergency stationary RICE as defined in 40 C.F.R. Part 63, Subpart ZZZZ. Failure to comply with all of the requirements listed in 40 C.F.R. § 63.6640(f) may cause these engines to not be considered emergency engines, and therefore subject to all applicable requirements for non-emergency engines.

b. 40 C.F.R. Part 63, Subpart ZZZZ Requirements

(1) Operation and Maintenance Requirements
(40 C.F.R. § 63.6603(a) and Table 2(d))

	Operating Limitations
Compression ignition (distillate fuel) units: **Perkins Fire Pump** **Cummins Fire Pump**	- Change oil and filter every 500 hours of operation or annually, whichever comes first; - Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and - Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or Hussey shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

(2) Optional Oil Analysis Program
Hussey has the option of utilizing an oil analysis program which complies with the requirements of § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, Hussey must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for each engine. The analysis program must be part of the maintenance plan for each engine. [40 C.F.R. § 63.6625(i)]

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 63.6625(f)]

(4) Startup Idle and Startup Time Minimization Requirements
During periods of startup the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [40 C.F.R. § 63.6625(h) and 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(5) Annual Time Limit for Maintenance and Testing
As emergency engines, the units shall each be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). [40 C.F.R. § 63.6640(f)]

(6) Recordkeeping
Hussey shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, the number of hours each unit operated for non-emergency purposes, and the reason each engine was in operation during each time. [40 C.F.R. § 63.6655(f)]

E. Hand Spray Coaters #2 and #3

Hand spray coaters are used at Hussey to apply water reducible enamel paint to the components being produced in their spectator seating manufacturing facility.

1. State Regulations Applicability Review

   The hand spray coater operations are subject to 06-096 C.M.R. ch. 129 – *Surface Coating Facilities* (chapter 129), as the seating products manufactured at Hussey are considered metal furniture by definition. Hussey historically emits more than 2.7 tons of VOC on a 12-month rolling period from their hand spray coater operations.

2. BPT Findings

   a. BPT for the hand spray coater operations was defined in the previous air license A-374-71-L-R/A (dated March 22, 2012) as being the use of Low Solvent Coating Technology. Specifically, it was limited to the use of water borne enamel coatings having a VOC content of less than 2.0 pounds per gallon. This VOC limit is more conservative than the requirements of 06-096 C.M.R. ch. 129, Table 1 - *Emission limits expressed in terms of mass of VOC per volume of coating (excluding water and exempt compounds, as applied).* Compliance with the previous limit would result in compliance with the VOC limits of chapter 129. Therefore, BPT for the hand spray coater operations shall be the use of coatings with a VOC content of less than 2.0 pounds per gallon.

   b. BPT for the hand spray coater operations at Hussey shall include filtration for particulate control, with an efficiency rating of 85% or better.

   c. BPT for the hand spray coater operations shall also include compliance with the following requirements of chapter 129:

      1. Handling, storage and disposal of materials containing VOC shall be conducted at Hussey in accordance with chapter 129. Activities covered under this section shall include, but not be limited to spray gun cleaning, line cleaning, spray booth cleaning and wash off operations. [06-096 C.M.R. ch. 129 § 5]

      2. Hussey shall collect and record all applicable information required to demonstrate compliance with chapter 129. If required by the Department, Hussey shall perform compliance testing and demonstrate compliance by using the methods and procedures described in chapter 129. [06-096 C.M.R. ch. 129 § 6]

      (3) Hussey shall establish and maintain records necessary for determining compliance with the emission limitations in this chapter for a period of six (6) years, and shall make these records and reports available for inspection during normal business hours. Copies of these records and reports shall be provided to the Department and/or the Environmental Protection Agency upon request. [06-096 C.M.R. ch. 129 § 7]

(4) Upon becoming subject to chapter 129, facilities are required to submit an initial certification report to the Department. The report identifies each relevant coating line and the method(s) of compliance chosen for that line. Hussey submitted their initial certification report for their hand spray coating operations on May 27, 2011. If at any time a change in the method(s) of compliance for either of the coating lines is made, Hussey shall submit a new compliance certification report to the Department. [06-096 C.M.R. ch. 129 § 8(A)]

(5) Hussey shall submit a report of excess emissions to the Department if they utilize any coatings with a VOC content of 2.0 pounds per gallon or higher. The report shall be made to the Department in writing within thirty (30) days of any evidence showing excess emissions.

F. Three Stage Washer System

1. State Regulations Applicability Review

The Three Stage Washer System at Hussey is exempt from the requirements of 06-096 ch. 159 - *Control of Volatile Organic Compounds from Adhesives and Sealants.* The total annual VOC emissions from the sealants applied at Hussey are less than 200 pounds per calendar year. Hussey shall record and maintain monthly operational records of their sealant usage sufficient to demonstrate their compliance to this limit. Should Hussey ever increase their usage of VOC sealants, they would become subject to all of the requirements of 06-096 C.M.R. ch. 159.

2. BPT Findings

BPT for the Three Stage Washer system is the use of proper handling and storage techniques when using, applying or transferring the sealants.

G. VOC and HAP Limits

VOC emissions at Hussey are generated by the Hand Spray Coater and Three Stage Washer System operations. VOC from these processes and operations at Hussey shall not exceed 8.0 tons per year, based on a 12-month rolling total.

HAP limits at Hussey are generated solely from the Three State Washer System operation. HAP emissions from this operation shall not exceed 3.0 tons per year, based on a 12-month rolling total.

H. Material Handling Procedures for Materials Containing VOC and HAP

Procedures shall be followed when using or transferring materials containing VOC and/or HAP to prevent or minimize the potential for uncontrolled spills or leaks. Equipment

and/or systems used to apply the materials shall contain and control the product with no leaks. Containers used to store or transport the materials shall be free or cracks, holes and other defects, and shall remain closed at all times unless the materials are being transferred into, or being removed from them.

I. Powder Coating Finishing Operation

The powder coating used in this operation has no VOC content. BPT for particulate emissions shall be the use of filters or other equipment designed for this service.

J. Welding

Welding fumes emitted from the 12 manual welding stations and seven robotic welders are controlled by filtration units that discharge inside the building.

Additionally there are six manual welding units that have no pollution controls. These welding units are vented outside the building through stacks W10 through W15. BPT for the six manual welding units is limiting the visible emissions from stacks W10 through W15 to no more than 5% opacity on a six minute block average basis.

K. Roof Top Vents

Three motorized roof top vents, designated P-18, P-19 and P-20, are located in the finishing area, and are used to remove excess heat build-up from the building, primarily during the summer months. These vents were included in the last air license, but are categorically exempted from licensing by 06-096 C.M.R. Ch. 115, Appendix B, Insignificant Activities, Item 30. These vents will not be addressed any further in this air license.

L. Cyclones

Hussey has one cyclone at their facility for particulate removal in the Powder Coating Operation. This cyclone was included in the current air license but is not being carried forward in this air license because it discharges inside of the building. This cyclone will not be addressed any further in this air license.

M. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis.

N. Annual Emissions

1. Total Annual Emissions

Hussey shall be restricted to the following annual emissions, based on a 12-month rolling total, based on the following:

- 100 hours per year of operation each for the Perkins Fire Pump, the Cummins Fire Pump and Emergency Generator #1.
- VOC emissions from Hand Spray Coaters #2 and #3, and from the Three Stage Washer System shall not exceed a combined emission limit of 8.0 tons per year.
- HAP emissions from the Three Stage Washer System shall not exceed 3.0 tons per year.

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

Unit	PM	PM_{10}	SO_2	NO_x	CO	VOC	HAP
Boiler B-3	0.04	0.04	0.01	0.57	0.47	0.03	-
Boiler B-4	0.04	0.04	0.01	0.57	0.47	0.03	-
Emergency Generator #1	0.01	0.01	0.01	0.31	0.06	0.01	-
Perkins Fire Pump	0.02	0.02	0.01	0.23	0.05	0.02	-
Cummins Fire Pump	0.02	0.02	0.01	0.22	0.05	0.02	-
First Stage Washer Heater	0.19	0.19	0.02	2.55	2.14	0.14	-
Heater #9	0.06	0.06	0.01	0.85	0.71	0.05	-
Heater #19	0.13	0.13	0.01	1.75	1.47	0.10	-
Heater #23	0.05	0.05	0.01	0.62	0.52	0.03	-
Burn-Off Oven #10	0.03	0.03	0.01	0.43	0.36	0.02	-
Small Parts Cure Oven	0.04	0.04	0.01	0.51	0.43	0.03	-
Dry-Off Oven	0.08	0.08	0.01	1.02	0.86	0.06	-
Process Emissions (Hand Spray Coaters and Third Stage Washer System)	-	-	-	-	-	8.0	3.0
Total TPY	**0.7**	**0.7**	**0.1**	**9.6**	**7.6**	**8.5**	**3.0**

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans,* 40 C.F.R. Part 52, Subpart A, § 52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 C.M.R. ch. 100, are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO_2e).

The quantity of CO_2e emissions from this facility is less than 100,000 tons per year, based on the following:

- worst case emission factors from the following sources: U.S. EPA's AP-42, the Intergovernmental Panel on Climate Change (IPCC), and *Mandatory Greenhouse Gas Reporting,* 40 C.F.R. Part 98; and
- global warming potentials contained in 40 C.F.R. Part 98.

No additional licensing actions to address GHG emissions are required at this time.

III. AMBIENT AIR QUALITY ANALYSIS

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

Pollutant	Tons/Year
PM_{10}	25
SO_2	50
NO_x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

ORDER

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

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

The Department hereby grants Air Emission License A-374-71-M-R/M subject to the following conditions.

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

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S. § 347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [06-096 C.M.R. ch. 115]

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 C.M.R. ch. 115]

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 C.M.R. ch. 115]

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

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

(7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 C.M.R. ch. 115]

(8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 C.M.R. ch. 115]

(9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 C.M.R. ch. 115]

(10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 C.M.R. ch. 115]

(11) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:

A. Perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
   1. Within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
   2. Pursuant to any other requirement of this license to perform stack testing.

B. Install or make provisions to install test ports that meet the criteria of 40 C.F.R. Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

C. Submit a written report to the Department within thirty (30) days from date of test completion.

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

(12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:

A. Within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department; and

B. The days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

C. The licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

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

(13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 C.M.R. ch. 115]

(14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 C.M.R. ch. 115]

(15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 C.M.R. ch. 115]

SPECIFIC CONDITIONS

(16) **Boilers, Heaters and Ovens**

A. Fuel

Hussey shall fire only natural gas as a fuel in the licensed boilers, heaters and ovens at their facility. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMscf	Origin and Authority
Boiler B-3 Boiler B-4 First Stage Washer Heater Heater #9 Heater #19 Heater #23 Burn-Off Oven #10 Small Parts Cure Oven Dry-Off Oven	PM	7.6	Air License A-374-71-L-R/A dated March 22, 2012, BPT

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

Emission Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler B-3	0.01	0.01	0.01	0.13	0.11	0.01
Boiler B-4	0.01	0.01	0.01	0.13	0.11	0.01
First Stage Washer Heater	0.04	0.04	0.01	0.58	0.49	0.03
Heater #9	0.02	0.02	0.01	0.19	0.16	0.01
Heater #19	0.03	0.03	0.01	0.40	0.34	0.02
Heater #23	0.01	0.01	0.01	0.14	0.12	0.01
Burn-Off Oven #10	0.01	0.01	0.01	0.10	0.08	0.01
Small Parts Cure Oven	0.01	0.01	0.01	0.12	0.10	0.01
Dry-Off Oven	0.02	0.02	0.01	0.23	0.20	0.01

D. Visible emissions from each of the boilers, heaters and ovens shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(17) **Emergency Generators**

A. The emergency generators shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 115, BPT]

B. Emissions for Emergency Generator #1 shall not exceed the following [06-096 C.M.R. ch. 115, BPT/BACT]:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Emergency Generator #1 0.50 MMBtu/hr Natural Gas	0.01	0.01	0.01	6.14	1.12	0.27

C. Visible emissions from the natural gas fired Emergency Generator #1 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

D. Emergency Generators #1, #2, #3 and #4, shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following:

1. Hussey shall meet the following operational limitations for their emergency generator engines:
   a. Change the oil and filter annually,
   b. Inspect the air cleaner annually and replace as necessary, and
   c. Inspect the hoses and belts annually and replace as necessary.

   Records shall be maintained documenting compliance with the operational limitations.

   [40 C.F.R. § 63.6603(a) and Table 2(d) and 06-096 C.M.R. ch. 115]

2. Oil Analysis Program Option
   Hussey has the option of utilizing an oil analysis program which complies with the requirements of § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, Hussey must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the emergency generator engines. The analysis program must be part of the maintenance plan for each engine. [40 C.F.R. § 63.6625(i)]

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on each emergency generator engine. [40 C.F.R. § 63.6625(f)]

4. Maintenance, Testing, and Non-Emergency Operating Situations

   a. As emergency engines, each engine shall each be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise to supply power as part of a financial arrangement with another entity). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written logs) of all engines' operating hours. [40 C.F.R. § 63.6640(f) and 06-096 C.M.R. ch. 115]

   b. Hussey shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, the number of hours each unit operated for non-emergency purposes, and the reason each engine was in operation during each time. [40 C.F.R. §§ 63.6655(e) and (f)]

5. Operation and Maintenance
   The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or Hussey shall develop a maintenance plan which provides to the extent practicable for the maintenance and operation of each engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

6. Startup Idle and Startup Time Minimization
   During periods of startup, the facility must minimize each engine's time spent at idle and minimize each engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [40 C.F.R. § 63.6625(h) & 40 C.F.R. Part 63, Subpart ZZZZ Table 2d

(18) Fire Pumps

A. Each of the emergency fire pumps shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 115, BPT]

B. The fuel sulfur content for the Perkins and the Cummins emergency fire pumps shall be limited to 0.0015% sulfur by weight. Compliance shall be demonstrated by fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 C.M.R. ch. 115, BPT]

C. Emissions shall not exceed the following:

Units	Pollutant	lb/MMBtu	Origin and Authority
Perkins Fire Pump Cummins Fire Pump	PM	0.31	AP-42, Table 3.3-1, dated October 1996, BPT

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

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Perkins Fire Pump 1.04 MMBtu/hr Distillate Fuel	0.32	0.32	0.01	4.59	0.99	0.36
Cummins Fire Pump 1.01 MMBtu/hr Distillate fuel	0.31	0.31	0.01	4.45	0.96	0.35

E. Visible Emissions from each of the distillate fuel-fired fire pumps shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

F. The Perkins Fire Pump and the Cummins Fire Pump shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following:

1. Hussey shall meet the following operational limitations for each of the emergency fire pump engines:

   a. Change the oil and filter annually,
   b. Inspect the air cleaner annually and replace as necessary, and
   c. Inspect the hoses and belts annually and replace as necessary.

   Records shall be maintained documenting compliance with the operational limitations.

   [40 C.F.R. § 63.6603(a) and Table 2(d) and 06-096 C.M.R. ch. 115]

2. Oil Analysis Program Option
   Hussey has the option of utilizing an oil analysis program which complies with the requirements of § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, Hussey must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for each engine. The analysis program must be part of the maintenance plan for each engine. [40 C.F.R. § 63.6625(i)]

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on each fire pump engine. [40 C.F.R. § 63.6625(f)]

4. Maintenance, Testing, and Non-Emergency Operating Situations
   a. As emergency engines, the units shall each be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise to supply power as part of a financial arrangement with another entity). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written logs) of all engine operating hours. [40 C.F.R. § 63.6640(f) and 06-096 C.M.R. ch. 115]
   b. Hussey shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, the number of hours each unit operated for non-emergency purposes, and the reason each engine was in operation during each time. [40 C.F.R. §§ 63.6655(e) and (f)]

5. Operation and Maintenance
   The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or Hussey shall develop a maintenance plan which provides to the extent practicable for the maintenance and operation of each engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

6. Startup Idle and Startup Time Minimization
   During periods of startup, the facility must minimize each engine's time spent at idle and minimize each engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [40 C.F.R. § 63.6625(h) & 40 C.F.R. Part 63, Subpart ZZZZ Table 2d

(19) Process Equipment

A. *Hand Spray Coaters #2 and #3*

1. Hand spray coaters shall utilize materials having a VOC content of less than 2.0 lb/gallon of coating. [06-096 C.M.R. ch. 115, BPT]

2. Particulate filtration having an efficiency of 85% or better shall be used when the hand spray coaters are in use. [06-096 C.M.R. ch. 115, BPT]

3. Handling, storage and disposal of materials containing VOC shall be conducted at Hussey in accordance with chapter 129. Activities covered under this section shall include, but not be limited to spray gun cleaning, line cleaning, spray booth cleaning and wash off operations. [06-096 C.M.R. ch. 129 § 5]

4. Hussey shall collect and record all applicable information required to demonstrate compliance with chapter 129. If required by the Department, Hussey shall perform compliance testing and demonstrate compliance by using the methods and procedures described in chapter 129. [06-096 C.M.R. ch. 129 § 6]

5. Hussey shall establish and maintain records necessary for determining compliance with the emission limitations in this chapter for a period of six (6) years, and shall make these records and reports available for inspection during normal business hours. Copies of these records and reports shall be provided to the Department and/or the Environmental Protection Agency upon request. [06-096 C.M.R. ch. 129 § 7]

6. If at any time Hussey should want to make a change in the method of compliance for VOC control to either of the hand spray coating lines, Hussey shall apply for and secure an amendment to their air license before proceeding. [06-096 C.M.R. ch. 115]

7. If at any time Hussey should consider making a change to utilize coatings whose VOC content exceeds the current license limits, Hussey shall first apply for and secure an amendment to their air license permitting this change before utilizing these coatings. [06-096 C.M.R. ch. 115]

8. If Hussey utilizes any coating whose VOC content exceeds the current license limit of 2.0 pounds per gallon without first securing an amended license to allow it, Hussey would be out of compliance. In the event that Hussey exceeds the current license limit, they shall submit a report of excess emissions to the Department within thirty (30) days detailing the circumstances that contributed to their non-compliance.

B. *Three Stage Washer System*

Hussey is exempt from the requirements of 06-096 C.M.R. ch. 159 - Control of Volatile Organic Compounds from Adhesives and Sealants because they emit less than 200 pounds of VOC per calendar year. Hussey shall record and maintain monthly operational records of their sealant usage sufficient to demonstrate their compliance to this limit. Should Hussey ever increase their usage of VOC sealants, they would become subject to all of the requirements of 06-096 C.M.R. ch. 159. [06-096 C.M.R. ch. 159 § 3(C)]

C. *VOC Emissions*

VOC emissions at Hussey are generated by the Hand Spray Coater and the Three Stage Washer System operations. VOC from these processes and operations at Hussey shall not exceed 8.0 tons per year, based on a 12-month rolling total. [06-096 C.M.R. ch. 115, BPT]

D. *HAP Emissions*

HAP emissions at Hussey are generated solely from the Three Stage Washer System operation. HAP emissions from this operation at Hussey shall not exceed 3.0 tons per year, based on a 12-month rolling total. [06-096 C.M.R. ch. 115, BPT]

E. *Documentation of VOC and HAP Emissions Generated*

Compliance with the above VOC and HAP tons per year emission limits shall be demonstrated by monthly mass balance calculations performed by Hussey. The calculations shall be based on the VOC and HAP content of the materials and the mass per unit volume of the materials used, as found on their respective Material Safety Data Sheets or Safety Data Sheets. Hussey shall maintain monthly records on site documenting the name and identification of each material used, and the quantities used each month. The calculations shall be made available to the inspector upon request. [06-096 C.M.R. ch. 115, BPT]

F. *Material Handling Requirements for Chemicals with VOC and HAP content*

Procedures shall be used when using or transferring materials containing VOC and/or HAP to prevent or minimize the potential for uncontrolled spills or leaks. Equipment and/or systems used to apply the materials shall contain and control the product with no leaks. Containers used to store or transport the materials shall be free or cracks, holes and other defects, and shall remain closed at all times unless the materials are being transferred into, or being removed from them. [06-096 C.M.R. ch. 115, BPT]

G. *Powder Coating Finishing Operation*

Hussey shall control particulate emissions from this operation by utilizing and maintaining filtration or other equipment that is designed for this service. [06-096 C.M.R. ch. 115, BPT]

H. *Welding*

Visible emissions from the welding processes that vent outdoors through stacks at Hussey shall not exceed 5% opacity from any point on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(20) **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. 115, BPT]

(21) Hussey shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S. § 605).

DONE AND DATED IN AUGUSTA, MAINE THIS 28 DAY OF April , 2017.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Cone for
PAUL MERCER, 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: January 3, 2017
Date of application acceptance: January 5, 2017

Date filed with the Board of Environmental Protection:

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

Filed
MAY 01 2017
State of Maine
Board of Environmental Protection