



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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**Elmet Technologies LLC
Androscoggin County
Lewiston, Maine
A-565-71-Q-R/M (SM)**

**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 Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Elmet Technologies LLC (Elmet Technology) has applied to renew their Air Emission License permitting the operation of emission sources associated with their manufacturing facility. Elmet Technology has also requested a minor revision to their license to add a new caustic cleaning tank for the cleaning of molybdenum and tungsten sheets and rods and to replace an existing boiler with a similar size boiler. Also, the facility no longer plans to operate the previously licensed steel mandrel dissolving tank and molybdenum mandrel dissolving tank.

The equipment addressed in this license is located at 1560 Lisbon Street, Lewiston, Maine.

B. Emission Equipment

Fuel Burning Equipment

| Equipment | Maximum Capacity (MMBtu/hr) | Fuel Type | Date of Manufacture | Stack # |
|------------------|------------------------------------|--|----------------------------|----------------|
| Bryan Boiler #1 | 4.0 | Natural gas, propane, propane/air mixture | 1984 | 1 |
| Burnham Boiler * | 3.9 | Natural gas, propane/air mixture, propane, distillate fuel | 2015 | 2 |

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| | | | | |
|-----------------|-----|--|------|---|
| Bryan Boiler #2 | 5.0 | Natural gas, propane/air mixture, propane, distillate fuel | 2005 | 3 |
|-----------------|-----|--|------|---|

* New unit which replaces the previously licensed Johnson-Burnham Boiler (3.6 MMBtu/hr)

Process Equipment

| Equipment | Pollution Control Equipment | Stack # |
|---|-----------------------------|----------------|
| Tungsten primary reduction furnaces | None | 7 |
| Molybdenum primary reduction furnaces | Baghouse | 8 |
| Mechanical doping tumblers | None | 68 |
| Molybdenum oxide grinder | Baghouse | 8 |
| Molybdenum sheet annealing furnace | None | 26 |
| (2) Caustic cleaning tank for molybdenum sheets * | None | 70, 71 |
| Wastewater evaporators | None | 58, 59, 60, 61 |

* One of the caustic cleaning tanks is new to this air emissions license

Elmet Technology also operates various fuel burning and process equipment that are not listed in the above tables because the equipment meets the criteria of an insignificant activity as described in Appendix B of 06-096 CMR 115. Two previously licensed emission sources, the Stud dryer and the drying of filament coils, are now considered insignificant sources. Air emissions from both sources are well below one ton per year as a result of reduction in chemical usage.

C. Definitions

Distillate Fuel means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials 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.

D. Application Classification

The application for Elmet Technology does not include the licensing of increased emissions, therefore, the license is considered to be a renewal of currently licensed emission units and has been processed through *Major and Minor Source*

Air Emission License Regulations, 06-096 Code of Maine Rules (CMR) 115 (as amended). With the annual fuel limit on the boilers and the control devices required on the process equipment, the facility is licensed below the major source thresholds for criteria pollutants and is considered a synthetic minor. With these fuel limits and control equipment requirements, the facility is licensed below the major source thresholds for hazardous air pollutants (HAP) and is considered an area source of HAP.

The amendment to include a new caustic tank will not increase licensed allowed emissions of any pollutant. The amendment to replace the previously licensed Johnson-Burnham Boiler with the new Burnham Boiler also does not increase licensed allowed annual emissions of any pollutant because the facility-wide fuel limit will not change. Therefore, these amendments are determined to be minor revisions and have 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 CMR 100 (as amended). 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 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

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.

Before proceeding with the control requirements for each unit a general process description is provided to identify where the equipment fits into the process.

Process Description

Elmet Technology manufactures molybdenum and tungsten metal from refined ores, and fabricated metal parts for various industrial applications. Both tungsten and molybdenum metal is manufactured in a similar manner. Tungsten and molybdenum ores are processed in primary reduction furnaces that convert the ores to metal oxides. Molybdenum oxide is processed in a grinder to break apart clumps of oxide powder. The metal oxides are then chemically doped in mechanical tumblers. The doped oxide powder is then heated in secondary reduction furnaces to convert the metal oxides to metal. The resulting metal powder is pressed into ingots that are then sintered in electric sintering furnaces, and further processed into various products, including wire, sheet and stud products.

Elmet Technology also operates a molybdenum sheet department; furnaces are used to heat molybdenum ingots in preparation for converting the ingots to sheet form in rolling mills. This department contains a gas-fired annealing furnace that is used to anneal the metal sheets. Metal sheets are cleaned in a caustic cleaning tank in which the caustic is heated using gas-fired burners. In addition, metal sheets are washed with a VOC-containing solvent. The wash water from this operation is disposed of in the facility's wastewater system and is eventually evaporated in the facility's four wastewater evaporators.

B. New Caustic Tank

Elmet Technology is requesting that a new caustic cleaning tank be added to their air emission license. The facility currently operates a caustic cleaning tank for the cleaning of molybdenum and tungsten sheets and rods. The tank is equipped with two burners for heating the caustic solution in the tank. Elmet Technology is proposing to add a second smaller tank consisting of two parts. Each part of the tank will have a designated burner and each burner will have a heat input capacity of 0.28 MMBtu/hr, with a total heat input capacity of 0.56 MMBtu/hr capable of firing natural gas. Similar to the existing tank, the proposed tank will contain a caustic solution for the cleaning of molybdenum and tungsten parts.

In accordance with 06-096 CMR 115, new emission units shall be equipped with Best Available Control Technology. Best available control technology for the burners will be the use of natural gas and good combustion practices. Elmet Technology will not increase its annual facility-wide fuel use limit for natural gas and no licensed allowed emissions will be changed.

C. New Burnham Boiler

Elmet Technology is requesting a Minor Revision to its air emission license for the replacement of the current multi-fuel (natural gas, propane, distillate fuel) fired boiler, identified on the air license as Johnson-Burnham Boiler with a multi-fuel (natural gas, propane and distillate fuel) boiler identified as the Burnham Boiler. The reason for the Minor Revision is to replace the existing boiler that has damaged fire tubes. The new unit, with a maximum heat input design capacity is 3.9 MMBtu/hr, was manufactured in 2015 and exhausts through existing Stack #2 at a height of 38 feet above ground level (AGL). Upon installation, Elmet Technology intends on burning natural gas in the boiler, but desires to retain the operational flexibility to continue to burn propane and distillate fuel as currently permitted.

(1) BACT Findings

The BACT emission limits for the boiler were based on the following:

Distillate Fuel

- PM/PM₁₀ – 0.12 lb/MMBtu based on 06-096 CMR 103
- SO₂ – based on firing distillate fuel with a maximum sulfur content of 0.5% sulfur by weight.
- NO_x – 20 lb/1000 gal based on AP-42, Table 1.3-1, dated 5/10
- CO – 5 lb/1000 gal based on AP-42, Table 1.3-1, dated 5/10
- VOC – 0.34 lb/1000 gal based on AP-42, Table 1.3-3, dated 5/10
- Opacity – 06-096 CMR 101 or previous BACT

Natural Gas/Propane

- PM/PM₁₀ – 0.05 lb/MMBtu based on 06-096 CMR 115, BPT
- SO₂ – 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
- Opacity – 06-096 CMR 101 or previous BACT

The BACT emission limits for the boiler are the following:

| Unit | Pollutant | lb/MMBtu |
|--|-----------|----------|
| Burnham Boiler (<i>distillate fuel</i>) | PM | 0.12 |
| Burnham Boiler (<i>natural gas/propane</i>) | PM | 0.05 |

| Unit | PM (lb/hr) | PM ₁₀ (lb/hr) | SO ₂ (lb/hr) | NO _x (lb/hr) | CO (lb/hr) | VOC (lb/hr) |
|---|---------------|-----------------------------|----------------------------|----------------------------|---------------|----------------|
| Burnham Boiler (distillate fuel) | 0.47 | 0.47 | 1.96 | 0.59 | 0.14 | 0.02 |
| Burnham Boiler (natural gas/propane) | 0.20 | 0.20 | 0.01 | 0.38 | 0.32 | 0.02 |

Visible emissions from the Burnham Boiler when firing distillate fuel shall not exceed 20% opacity on a 6 minute block average, except for no more than two (2) six (6) minute block average in a 3 hour period. Visible emissions from the Burnham Boiler when firing natural gas and/or propane shall not exceed 10% opacity on a 6 minute block average, except for no more than two (2) six (6) minute block average in a 3 hour period.

The federal requirements and periodic monitoring for the Burnham Boiler is explained in greater detail in the following section under the existing boilers.

D. Existing Boilers (Bryan Boiler #1 and Bryan Boiler #2)

Bryan Boiler #1 and Bryan Boiler #2 have maximum design heat input capacities of 4.0 MMBtu/hr and 5.0 MMBtu/hr, respectively. Each of these boilers is capable of firing natural gas and propane. Bryan Boiler #2 is also capable of firing distillate fuel.

- The Bryan Boiler #1 was manufactured in 1984 and exhausts through Stack #1 at a height of 34 feet above ground level (AGL).
- The Bryan Boiler #2 was manufactured in 2005 and exhausts through Stack #3 at a height of 45 feet AGL.

1. BPT Findings

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

Distillate Fuel

- PM/PM₁₀ – 0.12 lb/MMBtu based on 06-096 CMR 103
- SO₂ – based on firing distillate fuel with a maximum 0.5% sulfur by weight
- NO_x – 20 lb/1000 gal based on AP-42, Table 1.3-1, dated 5/10
- CO – 5 lb/1000 gal based on AP-42, Table 1.3-1, dated 5/10
- VOC – 0.34 lb/1000 gal based on AP-42, Table 1.3-3, dated 5/10
- Opacity – 06-096 CMR 101 or previous BACT

Natural Gas/Propane

- PM/PM₁₀ – 0.05 lb/MMBtu based on 06-096 CMR 115, BPT
- SO₂ – 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
- Opacity – 06-096 CMR 101 or previous BACT

The particulate matter BPT lb/MMBtu emission limit for each of the boilers is limited to the following:

| Unit | Pollutant | lb/MMBtu |
|---|-----------|----------|
| Bryan Boiler #2 (when firing distillate fuel) | PM | 0.12 |
| Bryan Boiler #1 Bryan Boiler #2 (when firing natural gas/propane) | PM | 0.05 |

Emissions from the Bryan Boiler #2, when firing distillate fuel, shall not exceed the following limits:

| Boiler | PM (lb/hr) | PM ₁₀ (lb/hr) | SO ₂ (lb/hr) | NO _x (lb/hr) | CO (lb/hr) | VOC (lb/hr) |
|-----------------|---------------|-----------------------------|----------------------------|----------------------------|---------------|----------------|
| Bryan Boiler #2 | 0.60 | 0.60 | 2.52 | 0.75 | 0.18 | 0.01 |

Emissions from each boiler while firing natural gas, propane or a propane/air mixture shall not exceed the following limits:

| Boiler | PM (lb/hr) | PM ₁₀ (lb/hr) | SO ₂ (lb/hr) | NO _x (lb/hr) | CO (lb/hr) | VOC (lb/hr) |
|-----------------|---------------|-----------------------------|----------------------------|----------------------------|---------------|----------------|
| Bryan Boiler #1 | 0.20 | 0.20 | 0.01 | 0.40 | 0.33 | 0.02 |
| Bryan Boiler #2 | 0.25 | 0.25 | 0.01 | 0.49 | 0.41 | 0.03 |

Visible emissions from each boiler when firing distillate fuel shall not exceed 20% opacity on a six (6) minute block average basis, except for no more than (2) six (6) minute block averages in a 3-hour period. Visible emissions from each boiler, when firing propane or natural gas, shall not exceed an opacity of 10 percent on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period.

Prior to July 1, 2016, or by the date otherwise stated in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired at the facility shall have a maximum sulfur content of 0.5% by weight. Per 38 M.R.S.A. §603-A(2)(A)(3), beginning July 1, 2016, or on the date specified in the statute, distillate fuel fired at the facility shall have a maximum sulfur content of 0.005% by weight (50 ppm), and beginning January 1, 2018, or on the date specified in the statute, distillate fuel fired at the facility shall have a maximum sulfur content of 0.0015% by weight (15 ppm). The specific dates and requirements contained in this paragraph reflect the current dates and requirements in the statute as of the effective date of this license; however, if the statute is revised, the facility shall comply with the revised dates and requirements upon promulgation of the statute revision.

2. Periodic Monitoring

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

3. 40 CFR Part 60, Subpart Dc

Due to the size of the boilers, Bryan Boiler #1, Burnham Boiler, and Bryan Boiler #2 are not subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989.

4. 40 CFR Part 63, Subpart JJJJJ

Bryan Boiler #2 and Johnson-Burnham Boiler, which are capable of firing distillate fuel, are subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ). The units are considered existing boilers rated less than 10 MMBtu/hr. Subpart JJJJJ is not applicable to units firing natural gas; therefore Bryan Boiler #1 is not subject to this rule.

A summary of the currently applicable federal 40 CFR Part 63 Subpart JJJJJ requirements is listed below. At this time, the Department has not taken delegation of this area source MACT (Maximum Achievable Control Technology) rule promulgated by EPA, however Elmet Technology is still subject to the requirements. Notification forms and additional rule information can be found on the following website:

<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

a. Compliance Dates, Notifications, and Work Practice Requirements

i. Initial Notification of Compliance

An Initial Notification submittal to EPA was due no later than January 20, 2014. [40 CFR Part 63.11225(a)(2)]

ii. Boiler Tune-Up Program

(a) A boiler tune-up program shall be implemented. [40 CFR Part 63.11223]

(b) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

| Boiler Category | Tune-Up Frequency |
|--|--------------------------|
| New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below | Every 2 years |
| <i>New and Existing Oil, Biomass, and Coal fired Boilers with less frequent tune up requirements</i> With a heat input capacity of <5MMBtu/hr (Johnson-Burnham Boiler rated at 3.6 MMBtu/hr) | Every 5 years |
| Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up | Every 5 years |

[40 CFR Part 63.11223(a) and Table 2]

(c) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(1)]

2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]
6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR Part 63.11223(b)(7)]

(d) Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:

1. The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
2. A description of any corrective actions taken as part of the tune-up of the boiler; and
3. The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

[40 CFR §63.11223(b)(6)]

(e) After conducting the initial boiler tune-up, a Notification of Compliance Status should have been submitted to EPA no later

than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]

iii. Compliance Report:

A compliance report shall be prepared by March 1st biennially for Bryan Boiler #2 and every five years for Johnson-Burnham Boiler which covers the previous calendar years. The report shall be maintained by the source and submitted to the Department and to the EPA upon request. The report must include the items contained in §63.11225(b)(1) and (2), including the following: [40 CFR §63.11225(b)]

- (a) Company name and address;
- (b) A statement of whether the source has complied with all the relevant requirements of this Subpart;
- (c) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
- (d) The following certifications, as applicable:
 - i. "This facility complies with the requirements in 40 CFR §63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
 - ii. "No secondary materials that are solid waste were combusted in any affected unit."
 - iii. "This facility complies with the requirement in 40 CFR §§63.11214(d) to conduct a tune-up of each applicable boiler according to 40 CFR §63.11223(b)."

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 CFR Part 63, Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]:

- i. Copies of notifications and reports with supporting compliance documentation;
- ii. Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
- iii. Records of the occurrence and duration of each malfunction of each applicable boiler; and
- iv. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [63.1125(a)(4)(vi)]

E. Process Equipment

Tungsten Primary Reduction Furnaces

Elmet Technology operates both electric and gas-fired furnaces. The gas-fired furnaces are capable of burning natural gas, propane, and a propane/air mixture. Hydrogen gas is supplied to the furnaces to provide an oxygen deprived atmosphere. Ammonia gas is emitted from the furnaces during the processing of the tungsten ore, along with combustion byproducts from the furnace burners, and particulate matter consisting of metal oxide. Elmet Technology uses a baghouse to capture the metal oxide dust for recycling.

The uncontrolled particulate matter emissions from all of these furnaces combined are less than one ton per year. Since the uncontrolled particulate emissions are less than the insignificant activity threshold of 1 ton per year specified in Appendix B of 06-096 115, it was determined in a previous licensing action that the operation of the baghouse is not required in order to meet BPT. BPT for these furnaces shall be the use of good operating practices.

Molybdenum Primary Reduction Furnaces

These furnaces are capable of burning natural gas, propane, and a propane/air mixture. Hydrogen gas is supplied to the furnaces to provide an oxygen deprived atmosphere. The primary reduction process generates molybdenum oxide, which is released from the furnaces in the form of particulate matter. Elmet Technology operates a baghouse to capture the particulate matter for recycling.

The uncontrolled particulate matter emissions from all of these furnaces combined exceed one ton per year. Therefore, BPT for these furnaces shall consist of continued operation of the baghouse, and an opacity limit of 10% on a six minute block average basis, except for one six-minute block average in a one hour period.

Mechanical Doping Tumblers

Tungsten and molybdenum oxides are mixed with chemical dopants (typically nitrate compounds) and heated in the tumblers. Heat is supplied by burners that can fire natural gas, propane, and a propane/air mixture. In addition to the combustion by-products that are emitted, NO_x is released from the nitrate

compounds. The emissions from the mechanical tumblers are directly vented to ambient air. BPT for the tumblers shall be the use of good operating practices.

Mechanical Grinder for Molybdenum Oxide

The mechanical grinder breaks apart clumps of molybdenum oxide powder to prepare the oxide for the secondary reduction process. The grinder is vented to a baghouse to capture and recycle molybdenum oxide powder. The uncontrolled particulate matter emissions from the grinder exceed one ton per year. Therefore, BPT for the grinder shall consist of continued operation of the baghouse and an opacity limit of 10% on a six-minute block average basis, except for one six-minute block average in a one-hour period.

Molybdenum Sheet Annealing Furnace

This furnace is equipped with six burners that are capable of firing natural gas, propane, and a propane/air mixture. Each burner has a heat input capacity of 325,000 Btu/hour, giving the furnace a total capacity of 1.95 MMBtu/hour. Emissions from the annealing furnace consist of combustion byproducts from the burners. BPT shall be the use of good combustion practices.

Caustic Cleaning Tank

Molybdenum sheets are soaked in a caustic solution, and the caustic solution is kept hot by heating the tank with two burners, each capable of firing natural gas or a propane/air mixture. The heat input capacity of each burner is 0.5 MMBtu/hour, giving the tank heating system a combined heat input capacity of 1 MMBtu/hour. BPT for the caustic cleaning tank shall be the use of good combustion practices. Elmet Technology plans to install an additional caustic cleaning tank as described earlier in this license.

Wastewater Evaporators

Certain wastewater streams generated at the facility are not permitted to be discharged to the municipal wastewater treatment plant. These streams are instead evaporated on-site in one of four wastewater evaporators. Each evaporator can be fired by either natural gas or a propane/air mixture, and each has a heat input capacity of 0.75 MMBtu/hour. The wastewater treated in the evaporators contains organic compounds that are emitted as VOC as a result of the evaporation process. One of the sources of organic compounds in the wastewater is the cleaning solution used in the molybdenum sheet washing operation. This washing operation currently contributes less than 0.5 tons per year of organic compounds to the wastewater.

Given the relatively minor emissions associated with this area, no additional measures are necessary to meet BPT. BPT shall be the use of good operating practices. Elmet Technology shall maintain records on the quantity of VOC emissions from the wastewater evaporators and make it available to the Department upon request.

F. Hydrogen Emissions

Elmet Technology had submitted an initial Part 70 application to the Department on the basis that the facility had the potential to emit a “major amount” (i.e. greater than 100 tons/year) of a pollutant regulated under the Clean Air Act, namely hydrogen. To address this, Elmet Technology installed hydrogen gas flow meters in 2003 in those areas of the factory where there is significant hydrogen usage and direct venting of hydrogen to the atmosphere. Elmet Technology currently determines its hydrogen emissions using data from these hydrogen flow meters. In addition, a flow meter was installed at the location that allows Elmet Technology to estimate the total hydrogen usage for the factory.

Elmet Technology will operate the hydrogen flow monitors to determine hydrogen emissions on a 12-month rolling total basis. If the data shows that hydrogen emissions are greater than 100 tons per year, the air emissions license will need to be updated and a determination for a Part 70 license will be reevaluated.

G. General Process Emissions

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period.

H. Annual Emissions

1. Total Annual Emissions

Elmet Technology is restricted to the following annual emissions, based on a 12-month rolling total. Based on the emission estimation methods used to develop these figures, emissions from certain “insignificant activities” are included in these figures. However, there are emissions from other insignificant activities at the plant that are not included in these figures.

Facility-wide fuel consumption is limited to the following quantities:

- Annual consumption of natural gas is limited to 250,000,000 standard cubic feet.
- Annual consumption of propane is limited to 2,763,000 gallons.

- The combined annual consumption of natural gas and propane is limited to the equivalent of 250,000 MMBtu of heat input based on 1,050 Btu/standard cubic foot for natural gas and 90,500 Btu/gallon for propane.
- Annual consumption of distillate fuel is limited to 200,000 gallons.

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

| Source | PM | PM10 | SO2 | NOx | CO | VOC | HCL | NH3 | H2 |
|--|------------|------------|------------|-------------|-------------|------------|------------|-------------|-----------|
| Boilers | 2.5 | 2.5 | 7.5 | 22.9 | 13.9 | 1.6 | - | - | |
| Tungsten primary reduction furnaces ^{1,2} | - | - | - | - | - | - | - | 20 | |
| Molybdenum primary reduction furnaces ^{1,2} | - | - | - | - | - | - | - | - | |
| Molybdenum oxide grinder | 1.0 | 1.0 | - | - | - | - | - | - | |
| Doping tumblers ¹ | - | - | - | 1.0 | - | - | - | - | |
| | | | | | | | | | |
| Molybdenum sheet annealing furnace ¹ | - | - | - | - | - | - | - | - | |
| Caustic cleaning tank ¹ | - | - | - | - | - | - | - | - | |
| Wastewater evaporators ¹ | - | - | - | - | - | 1.0 | - | - | |
| Total | 3.5 | 3.5 | 7.5 | 28.3 | 13.9 | 2.6 | 4.4 | 20.0 | 99 |

footnote 1: combustion emissions from this source are included with the Boiler emissions

footnote 2: non-combustion particulate emissions from this source are included with the molybdenum oxide grinder emissions

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans*, 40 CFR Part 52, Subpart A, §52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

The quantity of CO₂e emissions from this facility is less than 100,000 tons per year, based on the following:

- the facility's fuel use limits;
- worst case emission factors from the following sources: U.S. EPA's AP-42, the Intergovernmental Panel on Climate Change (IPCC), and 40 CFR Part 98, *Mandatory Greenhouse Gas Reporting*; and
- global warming potentials contained in 40 CFR 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 shall be determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient air quality impact analysis is not required for a minor source if the total 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-565-71-Q-R/M subject to the following conditions.

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

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S.A. §347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [06-096 CMR 115]
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 CMR 115]
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353-A. [06-096 CMR 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the

licensee for a renewal of a license or amendment shall not stay any condition of the license.

[06-096 CMR 115]

- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 - 1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 - 2. pursuant to any other requirement of this license to perform stack testing.
 - B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - C. submit a written report to the Department within thirty (30) days from date of test completion.
- [06-096 CMR 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
 - B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such

alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 CMR 115]

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

[06-096 CMR 115]

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

[06-096 CMR 115]

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

[06-096 CMR 115]

SPECIFIC CONDITIONS

- (16) Bryan Boiler #1, Burnham Boiler and Bryan Boiler #2:

[06-096 CMR 115, BPT]

A. Fuel

1. Total fuel use for Elmet Technology shall not exceed 200,000 gallons per year of distillate fuel, based on a 12-month rolling total basis. Annual consumption of natural gas shall not exceed 250,000,000 standard cubic feet. Annual consumption of propane shall not exceed 2,763,000 gallons. The combined annual consumption of natural gas and propane shall be limited to the equivalent of 250,000 MMBtu of heat input based on 1,050 Btu/standard cubic foot for natural gas and 90,500 Btu/gallon for propane.

[06-096 CMR 115, BPT]

2. Per the current dates and requirements of 38 M.R.S.A. §603-A(2)(A)(3), the facility shall comply with the following statements; however, if the statute is revised, the facility shall comply with the revised dates and requirements upon promulgation of the statute revision.
 - i. Prior to July 1, 2016, or the date specified in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired at the facility shall have a maximum sulfur content of 0.5% by weight. [06-096 CMR 115, BPT]
 - ii. Beginning July 1, 2016, or on the date specified in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired at the facility shall have a maximum sulfur content of 0.005% by weight (50 ppm). [38 M.R.S.A. §603-A(2)(A)(3)]
 - iii. Beginning January 1, 2018, or on the date specified in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired at the facility shall have a maximum sulfur content of 0.0015% by weight (15 ppm). [38 M.R.S.A. §603-A(2)(A)(3)]
3. Compliance shall be demonstrated by fuel records from the supplier showing the quantity, type, and the percent sulfur of the fuel delivered (if applicable). Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 CMR 115, BPT]

B. Emissions shall not exceed the following for each boiler when firing distillate fuel:

| Unit | Pollutant | lb/MMBtu | Origin and Authority |
|-----------------------------------|-----------|----------|-------------------------------|
| Bryan Boiler #2 Burnham Boiler | PM | 0.12 | 06-096 CMR 103(2)(B)(1)(a) |

Emissions shall not exceed the following for each boiler when firing natural gas and/or propane:

| Unit | Pollutant | lb/MMBtu | Origin and Authority |
|-----------------------------------|-----------|----------|------------------------|
| Bryan Boiler #2 Burnham Boiler | PM | 0.05 | 06-096 CMR 115, BPT |

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

Emissions from each boiler while firing natural gas or propane shall not exceed the following limits:

| Boiler | PM (lb/hr) | PM ₁₀ (lb/hr) | SO ₂ (lb/hr) | NO _x (lb/hr) | CO (lb/hr) | VOC (lb/hr) |
|-----------------|---------------|-----------------------------|----------------------------|----------------------------|---------------|----------------|
| Bryan Boiler #1 | 0.20 | 0.20 | 0.01 | 0.40 | 0.33 | 0.02 |
| Burnham Boiler | 0.20 | 0.20 | 0.01 | 0.38 | 0.32 | 0.02 |

| | | | | | | |
|-----------------|------|------|------|------|------|------|
| Bryan Boiler #2 | 0.25 | 0.25 | 0.01 | 0.49 | 0.41 | 0.03 |
|-----------------|------|------|------|------|------|------|

Emissions from the Johnson-Burnham Boiler and Bryan Boiler #2, when firing distillate fuel, shall not exceed the following limits:

| Boiler | PM (lb/hr) | PM ₁₀ (lb/hr) | SO ₂ (lb/hr) | NO _x (lb/hr) | CO (lb/hr) | VOC (lb/hr) |
|-----------------|---------------|-----------------------------|----------------------------|----------------------------|---------------|----------------|
| Burnham Boiler | 0.47 | 0.47 | 1.96 | 0.59 | 0.14 | 0.02 |
| Bryan Boiler #2 | 0.60 | 0.60 | 2.52 | 0.75 | 0.18 | 0.01 |

- D. Visible emissions from each boiler, when firing distillate fuel, shall not exceed 20% opacity on a six (6) minute block average basis, except for no more than (2) six (6) minute block averages in a 3-hour period. Visible emissions from each boiler, when firing propane or natural gas, shall not exceed an opacity of 10 percent on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period. [06-096 CMR 101]
- E. Boiler MACT (40 CFR Part 63, Subpart JJJJJ) Requirements for Bryan Boiler #2 and Burnham Boiler. [incorporated under 06-096 CMR 115, BPT]
1. An Initial Notification submittal to EPA was due no later than January 20, 2014. [40 CFR Part 63.11225(a)(2)]
 2. The facility shall implement a boiler tune-up program. [40 CFR Part 63.11223]
 - (a) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

| Boiler Category | Tune-Up Frequency |
|--|-------------------|
| New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below | Every 2 years |
| <i>New and Existing Oil, Biomass, and Coal fired Boilers with less frequent tune up requirements</i> With a heat input capacity of <5MMBtu/hr | Every 5 years |
| Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up | Every 5 years |

[40 CFR Part 63.11223(a) and Table 2]

- (b) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
- (1) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(1)]
 - (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
 - (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]
 - (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
 - (5) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]
 - (6) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR Part 63.11223(b)(7)]
- (c) Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:
- (1) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
 - (2) A description of any corrective actions taken as part of the tune-up of the boiler; and
 - (3) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- [40 CFR §63.11223(b)(6)]

- (d) After conducting the initial boiler tune-up, a Notification of Compliance Status should have been submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]

3. Compliance Report

A compliance report shall be prepared by March 1st biennially for Bryan Boiler #2 and every five years for the Johnson-Burnham Boiler which covers the previous calendar years. The report shall be maintained by the source and submitted to the Department and to the EPA upon request. The report must include the items contained in §63.11225(b)(1) and (2), including the following: [40 CFR §63.11225(b)]

- (a) Company name and address;
 - (b) A statement of whether the source has complied with all the relevant requirements of this Subpart;
 - (c) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
 - (d) The following certifications, as applicable:
 - (1) "This facility complies with the requirements in 40 CFR §63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
 - (2) "No secondary materials that are solid waste were combusted in any affected unit."
 - (3) "This facility complies with the requirement in 40 CFR §§63.11214(d) to conduct a tune-up of each applicable boiler according to 40 CFR §63.11223(b)."
4. Records shall be maintained consistent with the requirements of 40 CFR Part 63, Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]:
- (a) Copies of notifications and reports with supporting compliance documentation;
 - (b) Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
 - (c) Records of the occurrence and duration of each malfunction of each applicable boiler; and
 - (d) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports

for tune-ups and energy assessments through their electronic reporting system.
[63.1125(a)(4)(vi)]

(17) **Process Equipment**

A. Molybdenum Primary Reduction Furnaces and Mechanical Grinder for Molybdenum Oxide: [06-096 CMR 115, BPT]

1. Elmet Technology shall vent the molybdenum primary reduction furnaces and the molybdenum oxide grinder to a baghouse.
2. Elmet Technology shall inspect the baghouse on at least a weekly basis for the following: visible emissions from the stack connected to the baghouse, the pressure drop across the baghouse, and accumulation of particulate matter in the collection drum. The results of these inspections shall be recorded in a log.
3. At least every six months, Elmet Technology shall inspect the condition of the bags, the condition of the cleaning mechanism, and the pressure drop lines for possible plugging. The results of the semi-annual inspections shall be recorded in a log.
4. Elmet Technology shall perform maintenance on the baghouse at a frequency that is determined by Elmet Technology maintenance personnel to be appropriate based in part on the results of the inspections. Elmet Technology shall maintain a written record of maintenance work that is performed.
5. Visible emissions shall not exceed 10% opacity on a six minute block average basis, except for one six minute block average in a one hour period. [06-096 CMR 101]

- (18) Elmet Technology shall operate the hydrogen flow monitors to determine hydrogen emissions on a 12-month rolling total basis. To maintain status as a synthetic minor source, Elmet Technology shall limit hydrogen emissions to less than 100 tons per year on a 12-month rolling total basis. If the data shows that hydrogen emissions are greater than 100 tons per year (12-month rolling total), the license will need to be updated and a determination for a Part 70 license will be reevaluated. [06-096 CMR 115, BPT]

(19) **General Process Sources**

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

(20) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), the licensee 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 CMR 137.

Elmet Technologies LLC
Androscoggin County
Lewiston, Maine
A-565-71-Q-R/M (SM)

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Departmental
Findings of Fact and Order
Air Emission License
Renewal/Minor Revision

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

DONE AND DATED IN AUGUSTA, MAINE THIS 15 DAY OF July, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Maia Allen Robert Come for*
PATRICIA W. AHO, COMMISSIONER

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

[Note: If a complete renewal application, as determined by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 MRSA §10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the renewal of the license.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: November 13, 2012

Date of application acceptance: November 27, 2012

Date filed with the Board of Environmental Protection:

This Order prepared by Edwin Cousins, Bureau of Air Quality

