



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**Douglas Dynamics, L.L.C.
d/b/a Fisher Engineering
Knox County
Rockland, Maine
A-727-71-N-M (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

Douglas Dynamics, L.L.C. d/b/a Fisher Engineering (Fisher) was issued Air Emission License A-727-71-M-R/M on June 25, 2015, permitting the operation of emission sources associated with their steel fabrication and coating facility.

Fisher has requested a minor revision to their license in order to add an additional laser unit (Laser #3) for cutting plated steel.

The equipment addressed in this license is located at 50 Gordon Drive, Rockland, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Process Equipment

Equipment	Pollution Control Equipment	Efficiency*
Laser #3	1 Pleated Filter	99.9%

*Based on manufacturer data

C. Application Classification

This amendment will not increase emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143

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.

B. Laser #3

Fisher has requested to add one new piece of process equipment designated as Laser #3. It will be delivered to Fisher the first week of September and is expected to be placed into service by September 11, 2015. Laser #3 is the same model of Mitsubishi laser cutter as Lasers #1 and #2 referenced in Air Emission License A-727-71-M-R/M. Laser #3 will also be used to cut A36 carbon steel and stainless steel. Similar to Lasers #1 and #2, Laser #3 will include a 99.9% efficient pleated filter with a maximum flow rate of 1500 cubic feet per minute. The filter will be changed based on changes in the pressure differential. When the pressure differential becomes too large and the filters can't be cleaned anymore they are changed in addition to when they get wet or blow out/fail.

BACT for Laser #3 is the operation, maintenance, and routine inspection of the dust collection system. BACT for visible emissions from the Laser #3 filter outlet has been determined to be an opacity of 10 percent 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.

C. Annual Emissions

This minor revision does not change the total annual licensed emissions from Fisher.

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:

Douglas Dynamics, L.L.C.
d/b/a Fisher Engineering
Knox County
Rockland, Maine
A-727-71-N-M (SM)

Departmental
Findings of Fact and Order
Air Emission License
Amendment #1

<u>Pollutant</u>	<u>Tons/Year</u>
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-727-71-N-M subject to the conditions found in Air Emission License A-727-71-M-R/M and 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.

SPECIFIC CONDITIONS

The following Specific Condition will replace Specific Condition (16) from Air Emission License A-727-71-M-R/M:

(16) Process Equipment

- A. The VOC emissions from the Wash System, Paint #1-5, and the Parts Washer shall be calculated monthly and on a calendar year total basis to ensure compliance with the 5.0 ton per year VOC emission limit for VOC-process equipment. [06-096 CMR 115, BPT]
- B. Fisher shall operate and maintain the filters on Paint #1-5, Shot Blast #1, Mazak #1, Whitney #1, Plasma #1-3, Laser #1-2, and Laser #3, shall inspect them at least once a month, and shall document the inspections in a maintenance log. The maintenance log shall contain information on maintenance and filter replacement. [06-096 CMR 115, BPT and 06-096 CMR 115, BACT]

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d/b/a Fisher Engineering
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Rockland, Maine
A-727-71-N-M (SM)

Departmental
Findings of Fact and Order
Air Emission License
Amendment #1

4

- C. Visible emissions from the process equipment (Plasma #1-3, Mazak #1, Whitney #1, Shot Blast #1, Wash System, Paint #1-5, Laser #1-2, and Laser #3) shall not exceed an opacity of 10 percent 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]

DONE AND DATED IN AUGUSTA, MAINE THIS 4 DAY OF September, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Marie Allen Robert Corne for*
PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-727-71-M-R/M.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 20, 2015

Date of application acceptance: August 20, 2015

Date filed with the Board of Environmental Protection:

This Order prepared by Jonathan E. Rice, Bureau of Air Quality.

