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

DEPARTMENT ORDER

Maine Army National Guard **Camp Keyes** **Kennebec County** **Augusta, Maine** **A-802-71-J-R**	**Departmental** **Findings of Fact and Order** **Air Emission License** **Renewal**

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

Maine Army National Guard (Camp Keyes) has applied to renew their Air Emission License for the operation of emission sources associated with their military facility.

The equipment addressed in this license is located at 194 Winthrop St., Augusta, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Boiler #2A	1.73	1,680 scf/hr	Natural gas	2010	2010	14/35B
Boiler #2B	1.73	1,680 scf/hr	Natural gas	2010	2010	14/35B
Boiler #3A	1.73	1,680 scf/hr	Natural gas	2010	2010	37A
Boiler #3B	1.73	1,680 scf/hr	Natural gas	2010	2010	37A
Propane Heater (PH#1)	7.7	7,476 scf/hr	Natural gas*	1992	1992	37B

*Switched from propane to natural gas in 2018

Camp Keyes has also installed several small boilers, water heaters, and unit heaters. These are considered insignificant emissions units because they are each rated below 1.0 MMBtu/hr, the heat input capacity level, at or above which, would require their inclusion in the license; therefore, these small boilers, water heaters, and unit heaters are not addressed further in this license.

Stationary Engines

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (HP)	Fuel Type	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.
DG #1	5.25	750	Distillate fuel	38.3	1990	1990
DG #2	1.5	215	Distillate fuel	10.9	2008	2008
DG #3	2.8	400	Distillate fuel	20.4	2009	2009

Camp Keyes may operate small stationary engines smaller than 0.5 MMBtu/hr. These engines are considered insignificant activities and are not required to be included in this license. However, they are still subject to applicable State and Federal regulations. More information regarding requirements for small stationary engines is available on the Department's website at the link below.
http://www.maine.gov/dep/air/publications/docs/SmallRICEGuidance.pdf

Additionally, Camp Keyes may operate portable engines used for maintenance or emergency-only purposes. These engines are considered insignificant activities and are not required to be included in this license. However, they may still be subject to applicable State and Federal regulations.

Process Equipment

Equipment	Production Rate	Pollution Control Equipment	Stack #
Paint Spray Booth	0.5 gal/hr	Particulate Filters	37B

C. Definitions

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.

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

Portable or Non-Road Engine means an internal combustion engine which is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform. This definition does NOT include engines which remain or will remain at a location (excluding storage locations) for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source. A location is any single site at a building, structure, facility, or installation. Any engine that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period.

An engine is not a non-road (portable) engine if it remains or will remain at a location for more than 12 consecutive months or for a shorter period of time if sited at a seasonal source. A seasonal source is a source that remains in a single location for two years or more and which operates for fewer than 12 months in a calendar year. If an engine operates at a seasonal source for one entire season, the engine does not meet the criteria of a non-road (portable) engine and is subject to applicable stationary engine requirements.

D. Application Classification

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

The application for Camp Keyes 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.

E. Facility Classification

With the operating hours restriction on the emergency generators, the facility is licensed as follows:

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

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

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

BPT for 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 #2A, #2B, #3A, and #3B

Camp Keyes operates Boilers #2A, #2B, #3A, and #3B for heat and hot water. The boilers are each rated at 1.73MMBtu/hr and all fire natural gas. Boilers #2A, #2B, #3A, and #3B were all manufactured and installed in 2010. Boilers #2A and #2B exhaust through common Stack #14/35B. Boilers #3A and #3B exhaust through common Stack #37A.

1. BPT Findings

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

Natural Gas

$PM/PM_{10}/PM_{2.5}$	–	0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, 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 Boilers #2A, #2B, #3A, and #3B are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #2A	0.09	0.09	0.09	0.001	0.17	0.14	0.01
Boiler #2B	0.09	0.09	0.09	0.001	0.17	0.14	0.01
Boiler #3A	0.09	0.09	0.09	0.001	0.17	0.14	0.01
Boiler #3B	0.09	0.09	0.09	0.001	0.17	0.14	0.01

2. Visible Emissions

   Visible emissions from Stack #14/35B and from Stack #37A shall not exceed 10% opacity on a six-minute block average basis.

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

   Due to their size, Boilers #2A, #2B, #3A, and #3B 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]

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

   Boilers #2A, #2B, #3A, and #3B are not subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ. Boilers #2A, #2B, #3A, and #3B are all natural-gas fired boilers, and gas-fired boilers are exempt from 40 C.F.R. Part 63, Subpart JJJJJJ. [40 C.F.R. §§ 63.11193 and 63.11195]

C. Propane Heater (PH #1)

Camp Keyes operates a propane heater, designated as PH #1, to provide heat to the facility's paint booth during painting operations. PH #1 is rated at 7.7 MMBtu/hr and was converted to fire natural gas in 2018. PH #1 was manufactured and installed in 1992 and exhausts through Stack #37B.

1. BPT Findings

   The BPT emission limits for PH #1 were based on the following:

   Natural Gas

$PM/PM_{10}/PM_{2.5}$	–	0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, 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. 101

   The BPT emission limits for PH #1 are the following:

Unit	Pollutant	lb/MMBtu
PH #1	PM	0.05

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
PH #1	0.39	0.39	0.39	0.004	0.75	0.63	0.04

2. Visible Emissions

   Visible emissions from PH #1 shall not exceed 10% opacity on a six-minute block average basis.

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

   Due to the size and due to the fact that PH #1 is not a steam generating unit, PH #1 is 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]

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

   PH #1 is not subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ. PH #1 fires natural gas and does not meet the definition of a boiler as defined in 40 C.F.R. § 63.11237 and is therefore exempt from 40 C.F.R. Subpart JJJJJJ. [40 C.F.R. §§ 63.11193, 63.11195, and 63.11237]

D. Emergency Generators

Camp Keyes operates three emergency generators, designated as DG #1, DG #2, and DG #3. The emergency generators are generator sets with each gen set consisting of an engine and an electrical generator. The emergency generators have engines rated at 5.25 MMBtu/hr, 1.5 MMBtu/hr, and 2.8 MMBtu/hr, respectively. DG #1, DG #2, and DG #3 all fire distillate fuel. The emergency generators were manufactured and installed in 1990, 2008, and 2009, respectively.

1. BPT Findings

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

$PM/PM_{10}/PM_{2.5}$	–	0.12 lb/MMBtu from 06-096 C.M.R. ch. 103
SO_2	–	Combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
NO_x	–	3.2 lb/MMBtu from AP-42 Table 3.4-1 dated 10/96
CO	–	0.85 lb/MMBtu from AP-42 Table 3.4-1 dated 10/96
VOC	–	0.09 lb/MMBtu from AP-42 Table 3.4-1 dated 10/96
Visible Emissions	–	06-096 C.M.R. ch. 115, BPT

The BPT emission limits for DG #2 and DG #3 are based on the following:

$PM/PM_{10}/PM_{2.5}$	–	0.12 lb/MMBtu from 06-096 C.M.R. ch. 115, BPT
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 3.3-1dated 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 3.4-1 dated 10/96
Visible Emissions	–	06-096 C.M.R. ch. 115, BPT

The BPT emission limits for DG #1, DG #2, and DG #3 are the following:

Unit	Pollutant	lb/MMBtu
DG #1	PM	0.12

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
DG #1	0.63	0.63	0.63	0.01	16.80	4.46	0.47
DG #2	0.18	0.18	0.18	0.002	6.62	1.43	0.54
DG #3	0.34	0.34	0.34	0.004	12.35	2.66	1.01

Visible emissions from each of the emergency generators shall not exceed 20% opacity on a six-minute block average basis.

2. Chapter 169

DG #1, DG #2, and DG #3 were licensed prior to the effective date of *Stationary Generators*, 06-096 C.M.R. ch. 169 and are therefore exempt from this rule pursuant to section 3(B).

3. New Source Performance Standards

Due to the date of manufacture of DG #1, the engine is 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 unit was manufactured prior to April 1, 2006. [40 C.F.R. § 60.4200]

40 C.F.R. Part 60, Subpart IIII is applicable to DG #2 and DG #3 since the units were ordered after July 11, 2005, and manufactured after April 1, 2006. [40 C.F.R. § 60.4200]

A summary of the currently applicable federal 40 C.F.R. Part 60, Subpart IIII requirements is listed below.

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 60, Subpart IIII, a stationary reciprocating internal combustion engine (ICE) is considered an **emergency** stationary ICE (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 60, Subpart IIII, 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;

- 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 ICE 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.

[40 C.F.R. §§ 60.4211(f) and 60.4219]

b. 40 C.F.R. Part 60, Subpart IIII Requirements

(1) Manufacturer Certification Requirement
The engines shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in 40 C.F.R. § 60.4202. [40 C.F.R. § 60.4205(b)] The EPA certifications supplied by the manufacturers are in the facility's air license file.

(2) Ultra-Low Sulfur Fuel Requirement
The fuel fired in the engines shall not exceed 15 ppm sulfur (0.0015% sulfur). [40 C.F.R. § 60.4207(b)]

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 60.4209(a)]

(4) Operation and Maintenance Requirements
The engines shall be operated and maintained according to the manufacturer's emission-related written instructions. Camp Keyes may only change those emission-related settings that are permitted by the manufacturer. [40 C.F.R. § 60.4211(a)]

Camp Keyes shall have available for review by the Department a copy of the manufacturer's emission-related written instructions for engine operation and maintenance. [06-096 C.M.R. ch. 115, BPT]

(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. § 60.4211(f)]

(6) Initial Notification Requirement
No initial notification is required under 40 C.F.R. Part 60, Subpart IIII for emergency engines. [40 C.F.R. § 60.4214(b)]

(7) Recordkeeping
Camp Keyes shall keep records that include 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. § 60.4214(b)]

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

By meeting the requirements of 40 C.F.R. Part 60, Subpart IIII, DG #2 and DG #3 also meet the requirements found in the *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 C.F.R. Part 63, Subpart ZZZZ. [40 C.F.R. § 63.6590(c)]

The NESHAP 40 C.F.R. Part 63, Subpart ZZZZ is applicable to DG #1. The unit is considered an existing, emergency stationary reciprocating internal combustion engine at an area HAP source and is 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 this unit from the federal requirements. [40 C.F.R. § 63.6585]

A summary of the currently applicable federal 40 C.F.R. Part 63, Subpart ZZZZ requirements is listed below.

a. Emergency Engine Designation and Operating Criteria [40 C.F.R. § 63.6640(f)]

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;
- 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.

DG #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 [40 C.F.R. § 63.6603(a) and Table 2(d)]

(1) Operation and Maintenance Requirements

(i) Change oil and filter every 500 hours of operation or annually, whichever comes first;

(ii) Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and

(iii) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

(iv) The engine shall be operated and maintained according to the manufacturer's emission-related written instructions, or Camp Keyes 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)]

Camp Keyes shall have available for review by the Department a copy of the manufacturer's written instructions or procedures developed by Camp Keyes that are approved by the engine manufacturer for engine operation and maintenance. [06 096 C.M.R. ch. 115, BPT]

(2) Optional Oil Analysis Program

Camp Keyes 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, Camp Keyes 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. [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

Camp Keyes 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)]

E. Liquid Storage Tanks

Camp Keyes has a 5,000-gallon F-24 tank of military-grade diesel fuel, a 1,000-gallon diesel fuel tank for DG #1 in Building 2, a 4,000-gallon heating oil tank in Building 15, and a 275-gallon heating oil tank at Building 36. There are also small, built-in tanks on the emergency generators. The 4,000-gallon heating oil tank has not been used since Camp Keyes switched to using natural gas in their boilers and heaters. There are no tanks at the Camp Keyes facility large enough to be subject to *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*, 40 C.F.R. Part 60, Subpart Kb; therefore, the tanks are mentioned for inventory purposes only, and will not be addressed further in the license.

F. Spray Paint Booth

1. BPT Findings

Camp Keyes operates the Spray Paint Booth for painting of various military vehicles. The Spray Paint Booth has been designed and constructed to minimize employee exposure to solvents and to minimize VOC and HAP emissions to the outside air. The booth is equipped with an updraft air circulation system. When in use, air flows into the Spray Paint Booth via ductwork, then the air is exhausted through particulate filters located in the booth's ceiling. Whenever spray painting is conducted, the Propane Heater, PH #1, (as discussed in Section (II)(C), above) is used to heat the Spray Paint Booth to conditions suitable for painting.

Camp Keyes uses various types of coatings, including non-VOC coatings. Camp Keyes has a VOC emissions limit of no greater than 2.5 ton/yr from the Spray Paint Booth. Camp Keyes also has a HAP emission limit of no greater than 1.0 ton/yr of any individual HAP and no greater than 2.0 ton/yr of total HAP emissions from the Spray Paint Booth. [06 096 C.M.R. ch. 115, BPT]

Camp Keyes shall maintain records of coatings used, VOC and HAP contents of each coating, and VOC and HAP emissions from the Spray Paint Booth. These records shall be readily available to the Department upon request. [06-096 C.M.R. ch. 115, BPT]

Visible emissions from the spray booth particulate filter exhaust shall not exceed 20% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 101 § 3(B)(4)]

2. Fabric Filter Particulate Control System Maintenance and Inspection Program

Camp Keyes also has an effective control device maintenance, inspection, and filter replacement program for the fabric filter particulate control system. BPT for the Spray Paint Booth shall be continued performance of the maintenance, inspection, and filter

replacement in accordance with the facility's current program. The filter replacement is based on the condition of the filter, rather than an annual replacement requirement since the Spray Paint Booth does not get enough use to require an annual replacement. A log shall be kept at the Paint Spray Booth documenting the dates and times it was used, as well as the condition of the filter elements prior to the start of each use. All corrective or preventative maintenance performed on the filter system shall be documented in a maintenance log and made available to the Department upon request. [06-096 C.M.R. ch. 115, BPT]

3. Chapter 153

The Spray Paint Booth is subject to *Mobile Equipment Repair and Refinishing*, 06-096 C.M.R. ch. 153. The Spray Paint Booth is exempt from *Surface Coating Facilities*, 06-096 C.M.R. ch. 129, because it is used for the refinishing of automobile, light duty, and heavy truck refinishing. [06-096 C.M.R. ch. 129 § 1(E)(3)(c)]

A summary of the currently applicable 06-096 C.M.R. ch. 153 requirements is listed below.

a. Spray guns used to apply mobile equipment repair and refinishing coatings shall be cleaned by one of the following:

(1) An enclosed spray gun cleaning system that is kept closed when not in use;
(2) Unatomized discharge of solvent into a paint waste container that is kept closed when not in use;
(3) Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; or
(4) Atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.

[06-096 C.M.R. ch. 153 § 3(F)]

b. Camp Keyes shall implement the following housekeeping and pollution prevention and training measures:

(1) Fresh and used coatings, solvents, and cleaning solvents shall be stored in nonabsorbent, nonleaking containers. The containers shall be kept closed at all times except when filling or emptying;
(2) Cloth, paper, or other absorbent applicators moistened with coatings, solvents, or cleaning solvents shall be stored in closed, nonabsorbent, nonleaking containers;
(3) Handling and transfer procedures shall minimize spills during the transfer of coatings, solvents, and cleaning solvents. Written standard operating procedures for the handling and transfer of coatings shall be developed and posted in a conspicuous location; and

(4) Ensure that any person who applies mobile equipment repair and refinishing coatings has completed training in the proper use and handling of the mobile equipment repair and refinishing coatings, solvents, and waste products in order to minimize the emission of air contaminants and to comply with this Section. All applicable personnel shall be trained by January 1, 2005, or upon hiring, whichever is later. Training records shall be kept in order to ensure compliance with this section. These records shall include an outline of the contents of the training session, the dates on which training sessions are conducted, and the names of attendees.

[06-096 C.M.R. ch. 153 § 3(G)]

G. Wood Shop Cyclone

Camp Keyes makes use of a wood shop for construction of small office furniture. Wood dust from the wood shop equipment is captured via a dust collection system and is vented to the outside via a dust cyclone. Dust captured by the cyclone drops down into a barrel located beneath the cyclone.

BPT for the Wood Shop Cyclone shall include periodic inspection of the cyclone to ensure proper operation and periodic removal of the collected dust so that the dust level does not accumulate to a level that the Wood Shop Cyclone is no longer effective.
[06-096 C.M.R. ch. 115, BPT]

Visible emissions from the Wood Shop Cyclone shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101 § 3(B)(4)]

H. Parts Washers

Camp Keyes operates three 30-gallon parts washers. The parts washers use mineral spirits with 100% VOC content. The parts washers are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130, and records shall be kept documenting compliance with the applicable requirements, which are contained in the Order section of this license.

This equipment is exempt from *Industrial Cleaning Solvents*, 06-096 C.M.R. ch. 166, pursuant to Section (3)(B).

I. Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility's annual air license fee and establishing the facility's potential to emit (PTE). Only licensed equipment is included, i.e., emissions from insignificant activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included except when required by state or federal regulations. Maximum potential emissions were calculated based on the following assumptions:

- Operating the boilers (Boilers #2A, #2B, #3A, and #3B) for 8,760 hr/yr each;
- Operating the Propane Heater (PH #1) for 8,760 hr/yr;
- Operating the emergency generators (DG #1, DG #2, and DG #3) for 100 hrs/yr each; and
- Annual VOC and HAP limits on the Spray Paint Booth.

This information does not represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

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

	PM	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_x**	**CO**	**VOC**	**Individual HAP**	**Total HAP**
Boilers	1.5	1.5	1.5	--	2.9	2.5	0.2	--	--
Propane Heater	1.7	1.7	1.7	--	3.3	2.8	0.2	--	--
Emergency Generators	0.1	0.1	0.1	--	1.8	0.4	0.1	--	--
Spray Paint Booth	--	--	--	--	--	--	2.5	1.0	2.0
Total TPY	**3.3**	**3.3**	**3.3**	**--**	**8.0**	**5.7**	**3.0**	**1.0**	**2.0**

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
$PM_{2.5}$	15
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.

This determination is based on information provided by the applicant regarding the expected construction and operation of the proposed emission units. If the Department determines that any parameter (e.g., stack size, configuration, flow rate, emission rates, nearby structures, etc.) deviates from what was included in the application, the Department may require Camp Keyes to submit additional information and may require an ambient air quality impact analysis at that time.

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-802-71-J-R subject to the following conditions.

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

STANDARD CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(16) The licensee shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S. § 605). [06-096 C.M.R. ch. 115]

SPECIFIC CONDITIONS

(17) **Boilers #2A, #2B, #3A, and #3B**

A. Boilers #2A, #2B, #3A, and #3B are licensed to fire natural gas. [06-096 C.M.R. ch.115, BPT]

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

Emission Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #2A	0.09	0.09	0.09	0.001	0.17	0.14	0.01
Boiler #2B	0.09	0.09	0.09	0.001	0.17	0.14	0.01
Boiler #3A	0.09	0.09	0.09	0.001	0.17	0.14	0.01
Boiler #3B	0.09	0.09	0.09	0.001	0.17	0.14	0.01

C. Visible emissions from Stack #14/35B Stack #37A and shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(18) **Propane Heater (PH #1)**

A. PH #1 is licensed to fire natural gas. [06-096 C.M.R. ch.115, BPT]

B. Emissions from PH #1 shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
PH #1	PM	0.05	06-096 C.M.R. ch. 115, BPT

C. Emissions from Ph #1 shall not exceed the following: [06-096 C.M.R. ch. 115, BPT]

Emission Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
PH #1	0.39	0.39	0.39	0.004	0.75	0.63	0.04

D. Visible emissions from PH #1 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 3(A)(3)]

(19) **Emergency Generators**

A. The emergency generators are licensed to fire distillate fuel. The fuel sulfur content of the fuel fired in DG #1, DG #2, and DG #3 shall be limited to 0.0015% sulfur by weight. Compliance shall be demonstrated by fuel delivery receipts from the supplier, fuel supplier certification, certificate of analysis, or testing of the tank containing the fuel to be fired. [06-096 C.M.R. ch. 115, BPT]

B. Emissions from the emergency generators shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
DG #1	PM	0.12	06-096 C.M.R. ch. 103, § (2)(B)(1)(a)

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

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
DG #1	0.63	0.63	0.63	0.01	16.80	4.46	0.47
DG #2	0.18	0.18	0.18	0.002	6.62	1.43	0.54
DG #3	0.34	0.34	0.34	0.004	12.35	2.66	1.01

D. Visible Emissions

Visible emissions from each emergency generator shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

E. DG #2 and DG #3 shall meet the applicable requirements of 40 C.F.R. Part 60, Subpart IIII, including the following: [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. Manufacturer Certification
The engines shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in § 60.4202. [40 C.F.R. § 60.4205(b)] The EPA certifications supplied by the manufacturers are in the facility's air license file.

2. Ultra-Low Sulfur Fuel
   The fuel fired in the engines shall not exceed 15 ppm sulfur (0.0015% sulfur). Compliance with the fuel sulfur content limit shall be demonstrated by fuel delivery receipts from the supplier, fuel supplier certification, certificate of analysis, or testing of the tank containing the fuel to be fired. [40 C.F.R. § 60.4207(b) and 06-096 C.M.R. ch. 115, BPT]

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 60.4209(a)]

4. Annual Time Limit for Maintenance and Testing

   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 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 log) of all engine operating hours. [40 C.F.R. § 60.4211(f) and 06-096 C.M.R. ch. 115, BPT]
   b. Camp Keyes shall keep records that include 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. § 60.4214(b)]

5. Operation and Maintenance
   The engines shall be operated and maintained according to the manufacturer's emission-related written instructions. Camp Keyes may only change those emission-related settings that are permitted by the manufacturer. [40 C.F.R. § 60.4211(a)]

   Camp Keyes shall have available for review by the Department a copy of the manufacturer's emission-related written instructions for engine operation and maintenance. [06-096 C.M.R. ch. 115, BPT]

F. DG #1 shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following: [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. Camp Keyes shall meet the following operational limitations for the compression ignition emergency engine:

a. Change the oil and filter every 500 hours of operation or annually, whichever comes first;
b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
c. Inspect the hoses and belts every 500 hours of operation or annually, whichever comes first, 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
Camp Keyes 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, Camp Keyes 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 the engine. [40 C.F.R. § 63.6625(f)]

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

a. 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 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. Camp Keyes shall keep records that include maintenance conducted on the engine***(s)*** 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(e) and (f)]

5. Operation and Maintenance
   The engine shall be operated and maintained according to the manufacturer's emission-related written instructions, or Camp Keyes shall develop a maintenance plan which provides 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)]

   Camp Keyes shall have available for review by the Department a copy of the manufacturer's written instructions or procedures developed by Camp Keyes that are approved by the engine manufacturer for engine operation and maintenance. [06 096 C.M.R. ch. 115, BPT]

6. Startup Idle and Startup Time Minimization
   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. [40 C.F.R. § 63.6625(h) & 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(20) **Spray Paint Booth**

A. Emission Limits and Compliance Demonstration

Emissions from the Spray Paint Booth shall not exceed any of the following:

1. 2.5 ton/yr of VOC;
2. 1.0 ton/yr of any individual HAP; and
3. 2.0 ton/year of total HAP.

Camp Keyes shall maintain records of coatings used, VOC and HAP contents of each coating, and VOC and HAP emissions from the Spray Paint Booth. These records shall be readily available to the Department upon request. [06-096 C.M.R. ch. 115, BPT]

Visible emissions from the Spray Paint Booth particulate filter exhaust shall not exceed 20% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 101 § 3(B)(4)]

B. Fabric Filter Particulate Control System Maintenance and Inspection Program

BPT for the Spray Paint Booth shall be continued performance of the maintenance, inspection, and filter replacement in accordance with the facility's current program. The filter replacement schedule is based on the condition of the filter, rather than an annual replacement requirement since the Spray Paint Booth does not get enough use to require an annual replacement. A log shall be kept at the Spray Paint Booth documenting the dates and times it was used, as well as the condition of the filter elements prior to the start of each use. All corrective or preventative maintenance

performed on the filter system shall be documented in a maintenance log and made available to the Department upon request. [06-096 C.M.R. ch. 115, BPT]

C. Chapter 153

The Spray Paint Booth shall be operated in compliance with *Mobile Equipment Repair and Refinishing* 06-096 C.M.R. ch. 153, including the following:

1. Spray guns used to apply mobile equipment repair and refinishing coatings shall be cleaned by one of the following:

   a. An enclosed spray gun cleaning system that is kept closed when not in use;
   b. Unatomized discharge of solvent into a paint waste container that is kept closed when not in use;
   c. Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; or
   d. Atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.

   [06-096 C.M.R. ch. 153 § 3(F)]

2. Camp Keyes shall implement the following housekeeping and pollution prevention and training measures:

   a. Fresh and used coatings, solvent, and cleaning solvents, shall be stored in nonabsorbent, nonleaking containers. The containers shall be kept closed at all times except when filling or emptying;
   b. Cloth and paper, or other absorbent applicators, moistened with coatings, solvents, or cleaning solvents, shall be stored in closed, nonabsorbent, nonleaking containers;
   c. Handling and transfer procedures shall minimize spills during the transfer of coatings, solvents, and cleaning solvents. Written standard operating procedures for the handling and transfer of coatings shall be developed and posted in a conspicuous location; and
   d. Ensure that any person who applies mobile equipment repair and refinishing coatings has completed training in the proper use and handling of the mobile equipment repair and refinishing coatings, solvents and waste products in order to minimize the emission of air contaminants and to comply with this Section. All applicable personnel shall be trained upon hiring. Training records shall be kept in order to ensure compliance with this section. These records shall include an outline of the contents of the training session, the dates on which training sessions are conducted, and the names of attendees.

   [06-096 C.M.R. ch. 153 § 3(G)]

(21) **Wood Shop Cyclone**

BPT for the Wood Shop Cyclone shall include periodic inspection of the cyclone to ensure proper operation and periodic removal of the collected dust so that the dust level does not accumulate to a level that the Wood Shop Cyclone is no longer effective.
[06-096 C.M.R. ch. 115, BPT]

Visible emissions from the Wood Shop Cyclone shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101 § 3(B)((4)]

(22) **Parts Washer**

Parts washers at Camp Keyes are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130.

A. Camp Keyes shall keep records of the amount of solvent added to each parts washer. [06-096 C.M.R. ch. 115, BPT]

B. The following are exempt from the requirements of 06-096 C.M.R. ch. 130 [06-096 C.M.R. ch. 130]:
   1. Solvent cleaners using less than two liters (68 oz.) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
   2. Wipe cleaning; and,
   3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.

C. The following standards apply to cold cleaning machines that are applicable sources under 06-096 C.M.R. ch. 130.

   1. Camp Keyes shall attach a permanent conspicuous label to each unit summarizing the following operational standards:
      a. Waste solvent shall be collected and stored in closed containers.
      b. Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
      c. Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
      d. The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
      e. Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the parts washer.
      f. When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.

g. Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
h. Work area fans shall not blow across the opening of the parts washer unit.
i. The solvent level shall not exceed the fill line.

2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches.
3. Each parts washer shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent.

[06-096 C.M.R. ch. 130]

(23) If the Department determines that any parameter value pertaining to construction and operation of the proposed emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, Camp Keyes may be required to submit additional information. Upon written request from the Department, Camp Keyes shall provide information necessary to demonstrate AAQS will not be exceeded, potentially including submission of an ambient air quality impact analysis or an application to amend this air emission license to resolve any deficiencies and ensure compliance with AAQS. Submission of this information is due within 60 days of the Department's written request unless otherwise stated in the Department's letter.

[06-096 C.M.R. ch. 115, § 2(O)]

DONE AND DATED IN AUGUSTA, MAINE THIS 7th DAY OF July, 2023.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____ for _____
MELANIE LOYZIM, COMMISSIONER

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

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: May 3, 2023
Date of application acceptance: May 3, 2023

Date filed with the Board of Environmental Protection:

This Order prepared by Kendra Nash, Bureau of Air Quality.

FILED
JUL 07, 2023
State of Maine
Board of Environmental Protection