



DEPARTMENT ORDER

Robbins Lumber, Inc.
Waldo County
Searsmont, Maine
A-834-71-J-R/A

Departmental
Findings of Fact and Order
Air Emission License
Renewal and Amendment

FINDINGS OF FACT

After review of the air emission license amendment and 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

Robbins Lumber, Inc. (Robbins) has applied to renew their Air Emission License for the operation of emission sources associated with their wood products coating facility.

The equipment addressed in this license is located at 221 Belfast-Augusta East Rd, Searsmont, Maine.

Additionally, Robbins has requested to install a dust collection system which would control particulate emissions from the sanding operations at the facility and vent the resulting filtered air outside the building in summer months.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Process Equipment

Equipment	Production Rate	Pollution Control Equipment
Coating Machine #1	22,800 board feet/day	N/A
Coating Machine #2	250 feet/min	Fabric Filters
Coating Machine #3	200 feet/min	Fabric Filters
UV Coating Line #4	80 feet/min	Dust Collection System
UV Coating Line #5	80 feet/min	Dust Collection System
Paint Booth #1	N/A	Fabric Filters
Paint Booth #2	N/A	Fabric Filters

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

This modification is determined to be a minor modification and has been processed as such.

D. Facility Classification

With the annual VOC and HAP limits associated with the coating operations, the facility is licensed as follows:

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

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

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

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

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. Process Description

Robbins operates a lumber coating process. When the lumber is delivered to the site, it is first inspected for knots. When required, the knots are coated by hand with BIN shellac or a similar primer-sealer to seal the knots so that they will not show up after the final coating is applied.

After the primer-sealer has dried, the lumber is fed through one of the coating machines. The boards are received at the discharge end of the coating machines and placed in racks for drying. The racks are positioned to allow for air flow through and around the lumber to minimize drying time. After the wood is dried, it is shipped off-site.

C. Primer-Sealer

Robbins uses an alcohol-based, pigmented shellac to prime surfaces before painting. Emissions from this process are exhausted from the building through the air scavenging system described in the Coating Machine #1 section below.

BPT for this operation is determined to be maintaining records demonstrating compliance with the facility-wide VOC and HAP emission limits.

D. Coating Machine #1

Coating Machine #1 is a tractor-roller and flushing and brushing process. Lumber is fed into a system of rollers that pull the lumber through a curtain of coating material. The flow of the coating material is controlled so that the application is a thick curtain of coating. The flow of the lumber through the curtain of coating material is designed so that all portions of the lumber receive an even coating of material. The rollers then push the lumber through a set of brushes that brush off the excess coating material. The excess coating material is collected in a collection tank and re-circulated through the system. The maximum production rate of the coating machine is approximately 22,800 board feet per day.

Emissions from Coating Machine #1 are vented through the air scavenger system, which consists of two perforated duct work piping systems that vent to the outdoors via a 45-foot high exhaust stack. The system uses a 36,000-cfm¹ fan to draw ambient air out of the first-floor work space. The system also uses a second, 20,000 cfm fan to draw ambient air out of the second-floor work space. The fans blow the air containing VOC and HAP released from materials used on Coating Machine #1 to the exhaust stack.

BPT for Coating Machine #1 is determined to be maintaining records demonstrating compliance with the facility-wide VOC and HAP emission limits.

¹ cfm = cubic feet per minute

Visible emissions from the air scavenging exhaust shall not exceed 5% opacity based on a six-minute block average.

E. Coating Machines #2 and #3

Coating Machines #2 and #3 use a spray coating method to apply the coating material. This method is more efficient than the curtain and brush method used on Coating Machine #1.

Lumber up to 12 inches wide is fed into each machine at a rate of approximately 250 feet per minute for Coating Machine #2 and up to 200 feet per minute for Coating Machine #3. The lumber is spray-coated with up to six spray nozzles or guns on Coating Machine #2 and four spray nozzles or guns on Coating Machine #3. Coating Machines #2 and #3 are each equipped with their own blower, stack, and filters for overspray control.

While high volume low pressure (HVLP) spray systems are used as a method to reduce the generation of particulate emissions from spray painting, Coating Machines #2 and #3 use fabric filters along with blowers to maintain the enclosures at a negative pressure and to capture PM emissions in the fabric filters. BPT for Coating Machines #2 and #3 is determined to be operation and maintenance of each machine's blowers and fabric filters as well as maintaining records demonstrating compliance with the facility-wide VOC and HAP emission limits.

Visible emissions from Coating Machines #2 and #3 shall each not exceed 5% opacity based on a six-minute block average.

F. UV Coating Lines #4 and #5

The Cefla UV oven vacuum coaters, UV Coating Lines #4 and #5, are multi-unit machines, each consisting of four head-sanding machines, one vacuum coating chamber, and an eight-lamp UV oven. The units each have an operational capacity of 30-80 feet per minute, providing 360 degree curing with 100% UV technology. Production based out of these units consist of moldings from solid wood finished with a pigmented seal. The coating material consists of 100% solids with no solvents; therefore, the emissions from the UV cure process, including VOC and PM, are negligible.

The dust generated from the sanding machines was previously collected, controlled, and vented within the building, but with the proposed addition of the Dust Collection System, PM emissions from UV Coating Lines #4 and #5 will be filtered and vented outside the building. The exterior venting through the Dust Collection System is only expected to be utilized during summer months, and filtered emissions will be returned to the interior of the building during the other months.

G. Paint Booths #1 and #2

Robbins uses two spray booths to apply a primer coat to finished wood products. A small amount of thinner and wood finish is also used in the booths. Primer is applied via spray

gun, and thinner and wood finish is applied by brush. Each spray booth is equipped with a blower and filters.

Similar to Coating Machines #2 and #3, although HVLP spray systems are a method used to reduce the generation of PM emissions from spray painting operations in uncontrolled spaces, PM emissions from Paint Booths #1 and #2 are controlled by an alternate method. Robbins utilizes a spray booth with filters to capture PM emissions from painting operations. BPT for the spray booths is determined to be operation and maintenance of the associated blowers and fabric filters as well as maintaining records demonstrating compliance with the facility-wide VOC and HAP emission limits.

Visible emissions from each of the spray booths shall be limited to 15% opacity each on a six-minute block average basis.

H. Dust Collection System

Robbins has proposed to install a Dust Collection System for the control of particulate matter emissions from the sanders which support Coating Machine #2 and the sanders associated with UV Coating Lines #4 and #5. Previously, emissions from these processes were collected by a baghouse which was vented to the interior of the building, classifying the emissions as categorically exempt per 06-096 C.M.R. ch. 115, Appendix B (A)(58). With the addition of the Dust Collection System which will replace the existing baghouse, emissions from these sources will be filtered and vented to the exterior of the building during summer months. During periods where heat loss from exterior venting would be economically untenable, the filtered exhaust from the Dust Collection System will be returned to the interior of the building during the other months.

Based on the BACT analysis provided by Robbins with the renewal and amendment application, the Department finds that the use of an ACT 4-80 Dust Collection System, utilizing filter media rated with a greater than 99% control efficiency, is BACT for the addition of this equipment and the external venting of PM emissions from sanding operations. Additionally, Robbins shall operate the Dust Collection System according to the manufacturer's written instructions and inspect the ductwork and filters at least once per month and document the inspections in a maintenance log. The maintenance log shall contain information on maintenance, failures, and corrective actions.

Visible emissions from the Dust Collection System shall not exceed 5% opacity on a six-minute block average basis.

I. Annual VOC and HAP Limit

Robbins is subject to a total annual VOC emissions limit of 49.9 ton per year (tpy) and a total annual HAP emissions limit of 9.9 tpy of any single HAP and 24.9 tpy for all HAPs combined. All emission limits are on a 12-month rolling total basis.

To demonstrate compliance with VOC and HAP emission limits, Robbins shall maintain material use records of all material containing VOC and/or HAP. The records shall include dates of material use, type of material used, volume of material used, and VOC and HAP content of each material based on safety data sheets (SDS). These records and calculations of VOC and HAP emitted shall be maintained, calculated, and recorded monthly as well as on a 12-month rolling total basis. For the purposes of this license, the volume of material used shall be equal to the amount of material verified to have been purchased by purchase receipts minus the amount of each material remaining in inventory.

J. Future Addition of UV Coaters

Previously, Robbins' Air Emission License had a provision where the addition of new UV Coating Machines would not require that the facility apply for a minor revision to their Air Emission License. This was because the addition of such equipment would not increase the emissions of VOC or PM from the facility because the UV coating does not release VOC, and the PM emissions from the associated sanding emissions were contained to the interior of the building. With the addition of the Dust Collection System, the filtered emissions of PM are now vented externally and would no longer classify the emissions of PM as a categorically exempt activity. Robbins will be required to apply to amend their Air Emission License whenever new equipment is added which is not considered categorically exempt.

K. Non-Applicable Regulations

1. Robbins is not subject to *Surface Coating Facilities*, 06-096 C.M.R. ch. 129, which establishes requirements for testing, evaluating, and limiting the emissions of VOC and HAP from selected surface coating operations. Surface coating activities as defined under this regulation include surface coating of flatwood panel products. The definition of flatwood paneling coating line includes exterior siding. However, the term "exterior siding" is not specifically defined by Chapter 129. Since exterior siding is included in a definition that refers to panels and sheets such as plywood and hardboard panels, it is the Department's interpretation that the flatwood paneling coating line definition is not intended to apply to boards. Therefore, the exterior siding boards produced at the Robbins facility are not covered by this definition and are not subject to Chapter 129.
2. Robbins is not subject to *National Emissions Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products* - Subpart QQQQ. Subpart QQQQ requirements apply to any new or existing affected source that performs surface coating operations involving wood building products, uses at least 4,170 liters of coating per year, and is a major source of hazardous air pollutants. Robbins is not a major source of hazardous air pollutants and therefore does not meet the definition for Subpart QQQQ applicability.

L. Industrial Cleaning Solvents

Robbins uses industrial cleaning solvents in cleaning activities as those terms are defined in *Industrial Cleaning Solvents*, 06-096 C.M.R. ch. 166. Those cleaning activities include the use of cleaning solvents to clean and maintain the coating machines. The potential to emit from these activities (before control) is less than 3.0 tons of VOC per year.

Robbins shall maintain records of material purchase or use records sufficient to verify actual emissions from the cleaning activities do not exceed 3.0 ton of VOC per calendar year.

M. Fugitive Emissions

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

N. General Process Emissions

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

O. Emission Statements

Robbins is subject to emissions inventory requirements contained in *Emission Statements*, 06-096 C.M.R. ch. 137. Robbins shall maintain records of the calculations of the VOC and/or HAP emissions from the coating operations and supporting materials on a calendar year total basis in order to comply with this rule.

In reporting year 2023 and every third year thereafter, Robbins shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). The Department will use these reports to calculate and invoice for the applicable annual air quality surcharge for the subsequent three billing periods. Robbins shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3). [38 M.R.S. § 353-A(1-A)]

P. 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 annual VOC and HAP limit.

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
Coating Operations	-	-	-	-	-	-	49.9
Total TPY	-	-	-	-	-	-	49.9

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

III. AMBIENT AIR QUALITY ANALYSIS

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

Pollutant	Tons/Year
PM ₁₀	25
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 licensed 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 Robbins 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-834-71-J-R/A 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) **Facility Wide Emissions Limits**

- A. Robbins shall not exceed facility-wide total annual emissions of 49.9 tons per year of VOC, 9.9 tons per year of any single HAP, or 24.9 tons per year of any combination of HAP, each based on a 12-month rolling total. [06-096 C.M.R. 115, BPT]
- B. To demonstrate compliance with VOC and HAP emission limits, Robbins shall maintain material use records of all material containing VOC and/or HAP. The records shall include dates of material use, type of material used, volume of material used, and VOC and HAP content of each material based on safety data sheets (SDS). These records and calculations of VOC and HAP emitted shall be maintained, calculated, and recorded monthly as well as on a 12-month rolling total basis. For the purposes of this license, the volume of material used shall be equal to the amount of material verified to have been purchased by purchase receipts minus the amount of each material remaining in inventory. [06-096 C.M.R. ch. 115, BPT]

(18) **Coating Machines**

- A. Visible emissions from the air scavenging exhaust shall not exceed 5% opacity based on a six-minute block average. [06-096 C.M.R. 115, BPT]
- B. Robbins shall operate the blower and utilize fabric filters during all periods of operation of Coating Machines #2 and #3. [06-096 C.M.R. 115, BPT]
- C. Robbins shall inspect the blower equipment and the coating machines filters at least once per month and document the inspections in a maintenance log. The maintenance log shall contain information on maintenance, failures, and corrective actions. [06-096 C.M.R. 115, BPT]
- D. Visible emissions from the Coating Machines #2 and #3 exhaust stacks shall each not exceed 5% opacity based on a six-minute block average. [06-096 C.M.R. 115, BPT]

(19) **Spray Booths**

- A. Robbins shall operate the spray booth exhaust fans during all periods of sprayer operation. [06-096 C.M.R. 115, BPT]

- B. Robbins shall maintain the spray booths in good working order, and any coating material spilled or excess coating material shall be cleaned up immediately.
[06-096 C.M.R. 115, BPT]
- C. Visible emissions from each of the spray booths shall be limited to 15% opacity on a six-minute block average basis. [06-096 C.M.R. 115, BPT]
- D. Robbins shall inspect the blower equipment and the spray booth filters at least once per month and document the inspections in a maintenance log. The maintenance log shall contain information on maintenance, failures, and corrective actions.
[06-096 C.M.R. 115, BPT]

(20) **Dust Collection System**

- A. Robbins shall operate the Dust Collection system according to the manufacturer's written instruction, inspect the ductwork and filters at least once per month and document the inspections in a maintenance log. The maintenance log shall contain information on maintenance, failures, and corrective actions.
[06-096 C.M.R. ch. 115, BACT]
- B. Visible emissions from the Dust Collection System shall not exceed 5% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BACT]

(21) **Industrial Cleaning Solvents**

Robbins shall maintain records of material purchase or use records sufficient to verify actual emissions from the cleaning activities do not exceed 3.0 ton of VOC per calendar year. [06-096 C.M.R. ch. 166, § 5(B)]

(22) **Fugitive Emissions**

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

(23) **General Process Sources**

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

(24) **Annual Emission Statements**

- A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, Robbins shall annually report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory. The

emission statement shall be submitted as specified by the date in 06-096 C.M.R. ch. 137.

- B. Robbins shall keep records of the calculations of the VOC and/or HAP emissions from the coating operations and supporting materials on a calendar year total basis in order to comply with 06-096 C.M.R. ch. 137. [06-096 C.M.R. ch. 137]
- C. In reporting year 2023 and every third year thereafter, Robbins shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). Robbins shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3). [38 M.R.S. § 353-A(1-A)]
- (25) If the Department determines that any parameter value pertaining to construction and operation of the 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, Robbins may be required to submit additional information. Upon written request from the Department, Robbins 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 17th DAY OF OCTOBER, 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: 8/17/23
Date of application acceptance: 8/22/23

Date filed with the Board of Environmental Protection:

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

