



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE  
GOVERNOR

PATRICIA W. AHO  
COMMISSIONER

**Hussey Seating Company  
York County  
North Berwick, Maine  
A-374-71-L-R/A (SM)**

**Departmental  
Findings of Fact and Order  
Air Emission License**

After review of the air emissions license renewal application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., §344 and §590, the Department finds the following facts:

**I. REGISTRATION**

**A. Introduction**

1. Hussey Seating Company (Hussey) has applied to renew its Air Emission License permitting the operation of emission sources associated with its spectator seating manufacturing facility.
2. Hussey has requested an amendment to its license to add a 1.33 MMBtu/hr boiler omitted from a previous license renewal.
3. The equipment addressed in this license is located at 38 Dyer Street Ext., North Berwick, Maine.

**B. Emission Equipment**

The following equipment is addressed in this air emission license:

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

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

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

SQUE ISLE  
CENTRAL DRIVE, SKYWAY PARK  
SQUE ISLE, MAINE 04679-2094  
) 764-0477 FAX: (207) 760-3143

**Fuel Burning Equipment**

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (scf/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Install. Date</u>	<u>Stack #</u>
Boiler B-3	1.3	1,291	Natural gas, neg. S	Unknown	B-3
Boiler B-4*	1.3	1,291	Natural gas, neg. S	Unknown	B-4
Heater #9	2.0	1,942	Natural gas, neg. S	Unknown	None
Heater #19	4.1	4,000	Natural gas, neg. S	Unknown	None
Heater #23	1.5	1,417	Natural gas, neg. S	Unknown	None
First Stage Washer Heater	6.0	5,825	Natural gas, neg. S	Unknown	P2
Burn Off #10	1.0	971	Natural gas, neg. S	Unknown	P10
Dry-Off Oven	2.4	2,330	Natural gas, neg. S	Unknown	P5
Small Parts Cure Oven	1.2	1,165	Natural gas, neg. S	Unknown	P6

\* Equipment added to license (omitted from previous license)

**Generators**

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (scf/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Install. Date</u>	<u>Stack #</u>
Generator #1	0.5	488	Natural gas, neg. S	2008	G1
Generator #2*	0.23	225	Natural gas, neg. S	Unknown	G2
Generator #3*	0.14	136	Natural gas, neg. S	Unknown	G3

\* Insignificant – listed for equipment inventory completeness only

**Fire Pumps**

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Install. Date</u>	<u>Stack #</u>
Perkins	1.04	7.6	Diesel, 0.05% S	Unknown	None
Cummins	1.01	7.4	Diesel, 0.05% S	Unknown	None

**Process Equipment**

<u>Equipment</u>	<u>Pollutant</u>	<u>Pollution Control Equipment</u>	<u>Stack #</u>
Hand spray coater #1	VOC, PM	Fabric filters	P1
Hand spray coater #2	VOC, PM	Fabric filters	P7
Hand spray coater #3	VOC, PM	Fabric filters	P8
Welding (12 manual and 7 robotic)	PM	Filters	None
Welding (4 manual – 2 operate daily, 2 operate intermittently)	PM	None	W10 – W15 inclusive

C. Application Classification

The application for Hussey includes the licensing of increased emissions. Therefore, the license is considered to be a renewal of current licensed emission units with an amendment and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended). With the operating hours restriction on the emergency generators and the fire pumps, the facility is licensed below the major source thresholds and is considered a synthetic minor.

A new emission unit at a minor source is considered a major modification based on whether or not expected emission increases exceed the “Significant Emission” levels as defined in 06-096 CMR 100. The emission increases for a new source are determined by the maximum future license allowed emissions, as follows:

<u>Pollutant</u>	<u>Max. Future License (TPY)</u>	<u>Significance Level (TPY)</u>
PM	0.83	100
PM <sub>10</sub>	0.83	100
SO <sub>2</sub>	0.08	100
NO <sub>x</sub>	12.66	100
CO	8.21	100
VOC	8.94	50
CO <sub>2e</sub>	13,000	100,000

Therefore, this is a minor modification. Since all emissions associated with this modification will increase, all criteria pollutants are subject to Best Available Control Technology (BACT) requirements.

## II. BEST PRACTICAL TREATMENT (BPT)

### A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

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

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

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

### B. Boilers, Heaters and Ovens

Hussey operates Boilers B-3 and B-4 for heat. The boilers are each rated at 1.3 MMBtu/hr, fire natural gas and exhaust through their own separate stack.

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

Hussey operates Heater #9, rated at 2.0 MMBtu/hr, Heater #19, rated at 4.1 MMBtu/hr, Heater #23, rated at 1.5 MMBtu/hr, and the First Stage Washer heater, rated at 6.0 MMBtu/hr. All four heaters fire natural gas. Hussey also operates Burn Off Oven #10, rated at 1.0 MMBtu/hr, Dry-Off Oven, rated at 2.4 MMBtu/hr and the Small Parts Cure Oven, rated at 1.2 MMBtu/hr.

Because the Heaters and the Ovens are not steam-generating units, they are not subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989.

#### 1. BPT Findings

Hussey shall fire only natural gas in the Boilers, Heaters and Ovens.

The BPT emission limits for the Boilers, Heaters and Ovens are based on the following:

PM/PM<sub>10</sub> – 7.6 lb/MMscf based on AP-42, Table 1.4-2 (dated 7/98)  
SO<sub>2</sub> – 0.6 lb/MMscf: AP-42, Table 1.4-2 (dated 7/98)  
NO<sub>x</sub> – 100 lb/MMscf: AP-42, Table 1.4-1 (dated 7/98)  
CO – 84 lb/MMscf: AP-42, Table 1.4-1 (dated 7/98)  
VOC – 5.5 lb/MMscf: AP-42, Table 1.4-2 (dated 7/98)  
Opacity – Visible emissions from each of the boilers, heaters and ovens shall not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a three (3) hour period.

#### 2. 40 CFR Part 63 Subpart JJJJJ

Boilers B-3 and B-4 are not subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ). These units are existing natural gas fired boilers.

The three heaters and the three ovens are not subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ).

C. Emergency Generators

Hussey operates three emergency generators, two of which, Emergency Generators #2 and #3, are considered insignificant because of their size, 0.23 and 0.14 MMBtu per hour, respectively.

Emergency Generator #1 is a Ford ESG-642, 4 cycle, V6 cylinder, natural gas fired, spark ignited generator, manufactured in 2008 and installed in 2009.

1. A summary of BPT for Emergency Generator #1 is the following:

- A. Emergency Generator #1 shall fire natural gas.
- B. Emergency Generator #1 shall be limited to 500 hours per year of operation based on a 12-month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours.
- C. Emission limits for Emergency Generator #1 are based on the following:

PM/PM <sub>10</sub>	- 7.6 lb/MMscf, AP-42, Table 1.4-2 (dated 7/98)
SO <sub>2</sub>	- 0.6 lb/MMscf, AP-42, Table 1.4-2 (dated 7/98)
NO <sub>x</sub>	- 12.28 lb/MMBtu, manufacturer's exhaust emission data
CO	- 2.24 lb/MMBtu, manufacturer's exhaust emission data
VOC	- 0.54 lb/MMBtu, manufacturer's exhaust emission data
Opacity	- Visible emissions from Emergency Generator #1 shall not exceed 20% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a three (3) hour period.

2. 40 CFR Part 60, Subpart JJJJ

Emergency Generator #1 is a 70 horse power (50 kW), natural gas fired, spark ignited generator, manufactured in 2008 and installed in 2009.

The federal regulation 40 CFR Part 60, Subpart JJJJ, *Standards of Performance for Spark Ignition Internal Combustion Engines* is applicable to Emergency Generator #1 listed above as the unit was ordered after June 16, 2006 and manufactured after January 1, 2009. By meeting the requirements of Subpart JJJJ, the unit also meet the requirements found in the *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 CFR Part 63, Subpart ZZZZ.

Emergency Definition:

Emergency stationary internal combustion engine is defined in 40 CFR Part 60, Subpart JJJJ as any stationary internal combustion engine whose operation is limited to emergency situations and required testing and maintenance. Examples include stationary ICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary ICE used to pump water in the case of fire or flood, etc. Stationary SI ICE used for peak shaving are not considered emergency stationary ICE. Stationary ICE used to supply power to an electric grid or that supply power as part of a financial arrangement with another entity are not considered to be emergency engines.

40 CFR Part 60, Subpart JJJJ Requirements:

The emergency generator shall be certified by the manufacturer as meeting the emission standards for new non-road compression ignition engines found in 40 CFR Part 60, Subpart JJJJ, Table 1.

A non-resettable hour meter shall be installed and operated on the emergency generator. [40 CFR §60.4237]

The emergency generator shall be operated and maintained according to the manufacturer's written instructions or procedures developed by Hussey that are approved by the engine manufacturer. Hussey may only change those settings that are permitted by the manufacturer. [40 CFR §60.4243]

The emergency generator shall be limited to 100 hours per year for maintenance and testing. The emergency engine may operate up to 50 hours per year in non-emergency situations, but those 50 hours are included in the 100 hours allowed for maintenance and testing. The 50 hours for non-emergency use cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR §60.4243(d)]

D. Fire Pumps

Hussey operates two, diesel-fueled fire pumps, both installed prior to 2006; a Perkins, rated at 1.04 MMBtu/hr and a Cummins, rated at 1.01 MMBtu/hr.

1. The following is a summary of BPT for the fire pumps:

- A. Hussey shall fire only diesel fuel in the Perkins and Cummins Fire Pumps.
- B. The fire pumps shall each be limited to 500 hours per year of operation based on a 12-month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours.
- C. The BPT emission limits for the fire pumps are based on the following:

PM/PM <sub>10</sub>	- 0.31 lb/MMBtu from AP-42 Table 3.3-1 (dated 10/96)
SO <sub>2</sub>	- based on firing 0.05% sulfur, 0.05 lb/MMBtu;
NOx	- 4.41 lb/MMBtu, AP-42, Table 3.3-1 (dated 10/96);
CO	- 0.95 lb/MMBtu, AP-42, Table 3.3-1 (dated 10/96);
VOC	- 0.35 lb/MMBtu, AP-42, Table 3.3-1 (dated 10/96);
Opacity	- Visible emissions from each of the diesel emergency fire pumps shall not exceed 20% opacity on a 6 minute block average, except for no more than two (2) six (6) minute block averages in a 3 hour period.

2. 40 CFR Part 60, Subpart IIII

The Perkins and Cummins fire pumps were ordered prior to July 11, 2005 and manufactured prior to April 1, 2006. Therefore, these fire pumps are not subject to New Source Performance Standards 40 CFR Part 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*.

3. 40 CFR Part 63, Subpart ZZZZ

The federal regulation 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines* is applicable to the fire pumps listed above. The units are considered existing, emergency stationary reciprocating internal combustion engines at an area HAP source and are not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo specifically does not exempt these units from the federal requirements.

Emergency Definition:

Emergency stationary reciprocating internal combustion engine (RICE) is defined in 40 CFR Part 63, Subpart ZZZZ as any stationary internal combustion engine whose operation is limited to emergency situations and required testing and maintenance. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc. Stationary RICE used for peak shaving are not considered emergency stationary RICE. Stationary RICE used to supply power to an electric grid or that supply non-emergency power as part of a financial arrangement with another entity are not considered to be emergency engines, except as permitted under §63.6640(f).

§63.6640(f) limits maintenance checks and readiness testing of the units to 100 hours per year. Emergency stationary RICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph, as long as the power provided by the financial arrangement is limited to emergency power.

40 CFR Part 63, Subpart ZZZZ Requirements:

	<b>Compliance Dates</b>	<b>Operating Limitations* (40 CFR §63.6603(a) and Table 2(d))</b>
Compression ignition (diesel, fuel oil) units:  Perkins Fire Pump Cummins Fire Pump	No later than May 3, 2013	<ul style="list-style-type: none"> <li>- Change oil and filter every 500 hours of operation or annually, whichever comes first;</li> <li>- Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first;</li> <li>- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary</li> </ul>

\* Note: Due to the 500 hour operation limit on each fire pump, the inspections and oil filter changes shall be performed annually to meet the requirements of 40 CFR Part 63, Subpart ZZZZ.

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

A non-resettable hour meter shall be installed and operated on each fire pump. [40 CFR §63.6625(f)]

The fire pumps shall each be limited to 100 hours per year operation for maintenance and testing. Up to 50 hours per year of the 100 hours per year may be used in non-emergency situations (this does not include peak shaving or generating income or a financial arrangement with another entity). A maximum of 15 hours per year (of the 50 hours per year) may be used as part of a demand response program. [40 CFR §63.6640(f)(1)]

Hussey shall keep records that include maintenance conducted on the fire pumps and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency. If the fire pumps are used for demand response operation, Hussey must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [40 CFR §63.6655(e) and (f)]

E. Process Equipment and Emissions

1. Powder Coat Finish System

PM emissions from the Powder Coat Finish System are controlled by the use of filters, and are receiving BPT.

2. Hand Spray Coaters #1, #2 and #3

VOC Reasonable Available Control Technology (RACT) for hand sprayed finishes of large steel structures includes the use of water-borne enamel with a VOC content of less than 2.0 pounds per gallon of coating. BPT for hand spray processes includes the use of Andrea filters rated at 85% efficiency.

3. Roof Top Vents

Three roof top vents are used to remove excess heat build-up associated with the finishing system, especially during the summer months. Opacity from vents P-18, P-19 and P-20 shall not exceed five percent on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a (one) 1 hour period.

4. Welding

Welding fumes emitted from 12 manual welding stations and 7 robotic welders are controlled by Dc-8 Air Filtration units and bench filtration units which discharge outside the work area. The remaining six manual welding units have no controls and are vented outside the building through stacks W10 through W15. BPT for the welding stations is limiting opacity from stacks W10 through W15 to less than 5 percent on six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a one (1) hour period.

5. Woodworking

Wood processing includes cross cutting, jointing, ripping, shaping and surface sanding. PM from the woodworking area is not vented to the exterior of the building.

6. Hazardous Air Pollutant (HAP) Emissions

The use of solvents and coatings containing HAPs at Hussey is less than 10 tons per year, therefore, Hussey is not considered a major source for HAPs and is not subject to Title V permitting.

F. General Process Emissions

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

G. Annual Emissions

1. Hussey shall be restricted to the following annual emissions, based on a 12-month rolling total and the following:
  - licensed, natural gas fired equipment operates 8,760 hours per year
  - the natural gas fired Emergency Generator #1 and the diesel fired fire pumps each operate a maximum of 500 hours per year
  - process VOC emissions shall not exceed 8.0 tons per year
  - process HAP emissions shall not exceed 3.0 tons per year

**Total Licensed Annual Emissions for the Facility**  
**Tons per year**

(Used to calculate the annual license fee)

	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	HAP
Boilers B3 and B4	0.09	0.09	0.01	1.13	0.95	0.06	
Generator #1	0.01	0.01	0.01	1.54	0.28	0.07	
Heater #9	0.07	0.07	0.01	0.85	0.71	0.05	
Heater #19	0.13	0.13	0.01	1.76	1.48	0.10	
Heater #23	0.05	0.05	0.01	0.62	0.52	0.03	
Burn Off Oven #10	0.03	0.03	0.01	0.43	0.36	0.02	
First Stage Washer Heater	0.19	0.19	0.02	2.55	2.14	0.14	
Dry Off Oven	0.08	0.08	0.01	1.02	0.86	0.06	
Small Parts Cure Oven	0.04	0.04	0.01	0.51	0.43	0.03	
Perkins Fire Pump	0.08	0.08	0.01	1.15	0.25	0.09	
Cummins Fire Pump	0.08	0.08	0.01	1.11	0.24	0.09	
Process Emissions	--	--	--	--	--	8.0	3.0
<b>Total TPY</b>	<b>0.8</b>	<b>0.8</b>	<b>0.1</b>	<b>12.7</b>	<b>8.2</b>	<b>8.9</b>	<b>3.0</b>

2. Greenhouse Gases

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

Based Hussey's fuel and operating limits, the emission factors from the Intergovernmental Panel on Climate Change (IPCC), and the global warming potentials in *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, Hussey is below the major source threshold of 100,000 tons of CO<sub>2</sub> eq. per year. Therefore, no additional licensing requirements are needed to address GHG CO<sub>2</sub> eq. at this time.

### III. AMBIENT AIR QUALITY ANALYSIS

According to 06-096 CMR 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Modeling is not required for a renewal if the total emissions of any pollutant released do not exceed the following and there are no extenuating circumstances:

<b>Pollutant</b>	<b>Tons/Year</b>
PM	25
PM <sub>10</sub>	25
SO <sub>2</sub>	50
NO <sub>x</sub>	100
CO	250

Based on the total facility licensed emissions, Hussey is below the emissions level required for modeling.

### 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,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

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

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

**STANDARD CONDITIONS**

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

- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
    - 1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
    - 2. pursuant to any other requirement of this license to perform stack testing.
  - B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
  - C. submit a written report to the Department within thirty (30) days from date of test completion.  
[06-096 CMR 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

- B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
- C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 CMR 115]

- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

**SPECIFIC CONDITIONS**

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

- A. Hussey shall fire only natural gas in the Boilers, Heaters and Ovens.
- B. Emissions from EACH of Boilers B3 and B4 shall not exceed the following:  
 [06-096 CMR 115, BPT]

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boilers B3 and B4 (Each)	0.01	0.01	0.01	0.13	0.11	0.01

- C. Emissions from Heater #9 shall not exceed the following: [06-096 CMR 115, BPT]

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Heater #9	0.01	0.01	0.01	0.19	0.16	0.01

- D. Emissions from Heater #19 shall not exceed the following: [06-096 CMR 115, BPT]

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Heater #19	0.03	0.03	0.01	0.40	0.34	0.02

- E. Emissions from Heater #23 shall not exceed the following: [06-096 CMR 115, BPT]

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Heater #23	0.01	0.01	0.01	0.14	0.12	0.01

- F. Emissions from Burn Off Oven #10 shall not exceed the following: [06-096 CMR 115, BPT]

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Burn Off Oven #10	0.01	0.01	0.01	0.10	0.08	0.01

- G. Emissions from First Stage Washer Heater shall not exceed the following:  
[06-096 CMR 115, BPT]

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
First Stage Washer Heater	0.04	0.04	0.01	0.58	0.49	0.03

- H. Emissions from the Dry Off Oven shall not exceed the following: [06-096 CMR 115, BPT]

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Dry Off Oven	0.02	0.02	0.01	0.23	0.20	0.01

- I. Emissions from the Small Parts Cure Oven shall not exceed the following:  
[06-096 CMR 115, BPT]

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Small Parts Cure Oven	0.01	0.01	0.01	0.12	0.10	0.01

- J. Visible emissions from each Boiler, Heater or Oven shall not exceed 10% opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a three (3) hour period. [06-096 CMR 115, BPT]

(18) Diesel Fire Pumps

- A. The Perkins Fire Pump and the Cummins Fire Pump are each limited to 500 hours per year total operation, based on a 12-month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours. An hour meter shall be maintained and operated on each fire pump. [06-096 CMR 115]
- B. The fuel oil sulfur content for the fire pumps shall be limited to 0.05% by weight. Compliance shall be demonstrated by fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 CMR 115, BPT]

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

<u>Unit</u>	<u>PM</u> <u>(lb/hr)</u>	<u>PM<sub>10</sub></u> <u>(lb/hr)</u>	<u>SO<sub>2</sub></u> <u>(lb/hr)</u>	<u>NO<sub>x</sub></u> <u>(lb/hr)</u>	<u>CO</u> <u>(lb/hr)</u>	<u>VOC</u> <u>(lb/hr)</u>
Perkins Fire Pump	0.32	0.32	0.05	4.59	0.99	0.36

- D. Emissions from the Cummins Fire Pump shall not exceed the following [06-096 CMR 115, BPT]:

<u>Unit</u>	<u>PM</u> <u>(lb/hr)</u>	<u>PM<sub>10</sub></u> <u>(lb/hr)</u>	<u>SO<sub>2</sub></u> <u>(lb/hr)</u>	<u>NO<sub>x</sub></u> <u>(lb/hr)</u>	<u>CO</u> <u>(lb/hr)</u>	<u>VOC</u> <u>(lb/hr)</u>
Cummins Fire Pump	0.31	0.31	0.05	4.45	0.96	0.35

- E. Visible Emissions

Visible emissions from each of the diesel generators shall not exceed 20% opacity on a 6 minute block average, except for no more than two (2) six (6) minute block averages in a 3 hour period. [06-096 CMR 101]

(19) **Emergency Generator #1**

- A. Emergency Generator #1 shall fire natural gas.
- B. Emergency Generator #1 is limited to 500 hours per year total operation, based on a 12-month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours. [06-096 CMR 115]
- C. Emissions from Emergency Generator #1 shall not exceed the following [06-096 CMR 115, BPT]:

<u>Unit</u>	<u>PM</u> <u>(lb/hr)</u>	<u>PM<sub>10</sub></u> <u>(lb/hr)</u>	<u>SO<sub>2</sub></u> <u>(lb/hr)</u>	<u>NO<sub>x</sub></u> <u>(lb/hr)</u>	<u>CO</u> <u>(lb/hr)</u>	<u>VOC</u> <u>(lb/hr)</u>
Emergency Gen. #1	0.01	0.01	0.01	6.14	1.12	0.27

- D. Visible emissions from Emergency Generator #1 shall not exceed 10% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous three (3) hour period. [06-096 CMR 101]

- E. Emergency Generator #1 shall meet the applicable requirements of 40 CFR Part 60, Subpart JJJJ, including the following:
1. The emergency generator shall be certified by the manufacturer as meeting the emission standards for new non-road spark ignition engines found in 40 CFR Part 60, Subpart JJJJ, Table 1.
  2. A non-resettable hour meter shall be installed and operated on the emergency generator. [40 CFR §60.4237 and 06-096 CMR 115, BPT]
  3. The emergency generator shall be limited to 100 hours per year for maintenance and testing. The emergency engines may operate up to 50 hours per year in non-emergency situations, but those 50 hours are included in the 100 hours allowed for maintenance and testing. The 50 hours for non-emergency use cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. The limits are based on a 12-month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours [40 CFR §60.4243(d) and 06-096 CMR 115]
  4. The emergency generator shall be operated and maintained according to the manufacturer's written instructions or procedures developed by Hussey that are approved by the engine manufacturer. Hussey may only change those settings that are permitted by the manufacturer. [40 CFR §60.4243]

(20) **Process Equipment and Emissions**

- A. VOC emissions from all processes shall not exceed 8.0 tons per year based on a 12-month rolling total. [06-096 CMR 115, BPT]
- B. HAP emissions from all processes shall not exceed 3.0 tons per year based on a 12-month rolling total. [06-096 CMR 115, BPT]
- C. Compliance with the above VOC and HAP ton per year limits shall be demonstrated by monthly mass balance calculations using the amount of material used and the VOC and HAP content of the material as found on the MSDS sheets. Hussey shall maintain monthly records on the premises to document the name and identification of each coating and the mass of VOC and HAP per volume of each coating used on each coating unit, line or operation. [06-096 CMR 115, BPT]

- D. Visible emissions from the cyclones shall not exceed 5% opacity on a six (6) minute block average basis. Hoppers from both cyclones and the fabric filters shall be emptied regularly to ensure proper operation of the equipment. [06-096 CMR 115, BPT]
- E. Visible emissions from the roof top vents (P-18, P-19 and P-20) shall not exceed 5% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a one (1) hour period. [06-096 CMR 115, BPT]
- F. Visible emissions from the welding vents W10 through W15 inclusive shall not exceed 5% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a one (1) hour period. [06-096 CMR 115, BPT]
- G. All handling and transferring of VOC- and/or HAP-containing to and from containers and drums shall be conducted in a manner that minimizes spills. [06-096 CMR 115, BPT]

(21) **General Process Sources**

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

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

DONE AND DATED IN AUGUSTA, MAINE THIS 22<sup>nd</sup> DAY OF March, 2012.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie B. Foster  
PATRICIA W. AEO COMMISSIONER

**The term of this license shall be five (5) years from the signature date above.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 05/31/2011

Date of application acceptance: 06/06/2011

Date filed with the Board of Environmental Protection:

This Order prepared by N. Lynn Cornfield, Bureau of Air Quality.

