



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**Morris Yacht, Inc.
Hancock County
Trenton, Maine
A-824-71-C-R (SM)**

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

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

Morris Yacht, Inc. (MY) has applied to renew their Air Emission License permitting the operation of emission sources associated with their boat manufacturing facility.

The equipment addressed in this license is located at 27 Ramp Road, Trenton, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Process Equipment

<u>Equipment</u>	<u>Type of Equipment</u>	<u>Pollutants</u>	<u>Pollution Control Equipment</u>
Composite Fabrication	Spray guns and molding technology	Particulate emissions and fugitive VOC & HAPS	Particulate filters and vacuum infusion
Assembly	Job shop and molding technology	Particulate emissions and fugitive VOC & HAPS	Particulate filters, vacuum infusion and baghouse
Surface Finishing	Spray guns	Particulate emissions and fugitive VOC & HAPS	Particulate filters

C. Application Classification

The application for MY 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

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processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended). With the HAP emission limits on the processes, the facility is licensed below the major source thresholds and is considered a synthetic minor (SM).

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 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. Overall Process Description

The boats manufactured at MY are built using primarily gelcoat, fiberglass and resin. Other raw materials include paint, varnish, wood, foam etc. The facility currently consists of three primary buildings. The main building consists of a large assembly area, as well as offices and other miscellaneous assembly and workshop/ maintenance areas. A second building handles small parts fabrication and includes a chemical storage area. Varnishing primarily takes place in the third building, which contains a woodworking shop, machine shop, and paint and varnish application areas.

For licensing purposes, the manufacturing process is divided into two areas: (1) Fabrication Operations (hull, deck and small part lamination and gelcoat application) and (2) Assembly and Finishing Operations.

Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) constitute the facilities emissions. Styrene is the largest source of the HAPs/VOCs within the facility. MY is currently evaluating and testing the possibility of alternative varnishes and paints with lower VOC alternatives, as well as pollution prevention technologies such as low styrene resins. All resins used at the facility from 2001 to 2006 originally had a styrene content of 43%, but then in 2006 and 2007, MY reduced that styrene content to 33%. Currently, all resins used at MY have a styrene content ranging from 32% to 34%.

C. Fabrication Operations

The manufacturing of fiberglass boats at MY begins with hull and deck construction. In the molding process, boat parts are built from the outside in using primarily the closed mold method of vacuum infusion. The fabrication process consists of the following basic steps:

1. The mold is sprayed with a layer of gelcoat, which hardens and becomes the smooth outside surface.
2. The inside of the hardened gelcoat layer is hand coated with a "skin coat" of chopped glass fibers and polyester or vinylester resin.
3. Additional layers of fiberglass cloth or chopped glass fibers saturated with resin are added to create the outer laminate via vacuum infusion.
4. Structural core materials such as balsa wood are set in place and saturated by resin using vacuum infusion whereby resin is infused into the core materials.
5. The inner laminate is added in a similar manner as the outer laminate.
6. The internal supports and interior taping are added to provide support for equipment such as chain plates and engine mounts.
7. A thin layer of interior gelcoat is added by hand to create a finished surface.

The polyester and vinylester resins that are used in the hull and deck fabrication process at MY contain styrene as a solvent and a cross-linking agent. Gelcoats also contain methyl methacrylate (MMA) and styrene. Styrene and MMA are HAPs, of which a fraction evaporates during resin and gelcoat applications and curing. Mixing is done to stir the resin or gelcoat and promoters, fillers, and other additives before being applied. Some HAPs from resins and gelcoats may be emitted during mixing as well as actual application.

MY utilizes the process of vacuum infusion as the primary mold pollution control method to limit the emissions of HAPs while applying resins. During vacuum infusion, materials are laid together dry, enclosed within a bag and then compacted under a vacuum. Once a complete vacuum is achieved, resin is then pulled through the materials via tubing. By using vacuum infusion rather than an open molding process, VOC and HAP emissions are reduced by approximately 98%. At MY, approximately 90% of all resin applications are applied using vacuum infusion, and the remaining 10% are applied by hand or spray gun.

MY has installed particulate filters on all forced building exhaust points to control PM emissions during fabrication operations.

D. Assembly & Finishing Operations

Assembly and finishing operations include adhering the deck to the hull, installing equipment including engines, deck hardware, instrument panels, and installing interior items such as living area dividers, doors, fixtures, appliances and built in furniture. Grinding, sanding, machining and buffing of fiberglass surfaces and hull molds are performed at this stage. All woodworking is completed on site at MY. VOC emissions result from the use of glues, putties, resins, cleaning solvents and occasional touch up/repair work. PM emissions are generated by grinding, buffing, sanding, cutting, etc. and are controlled by internal dust collection systems, such as fabric and bag filters, which do not vent to the ambient air, and a baghouse located within the large assembly area in the main building. MY shall maintain proper operation and maintenance of the baghouse and frequent changing of the drums that collect captured particulate matter. MY shall maintain a log documenting inspection dates, times and reasons for inspections, and maintenance of the baghouse.

As part of the Assembly and Finishing Operations, MY has several designated areas for varnish and paint application. These include the varnish spray booth and the clean paint room. The varnish room is a spray application bay that is vented with a large fan. The exhaust is filtered to control PM emissions that would otherwise pass through the fan to the outside. All paint in the clean paint room is applied by hand. Windows may be opened in this room to provide ventilation as needed.

Varnishing and painting is also performed in other areas. For example, some of the wood to be varnished is fixed on the boats and is varnished in place at various stages in the process. Most varnish and paint applied outside the varnish area is applied by hand.

E. BPT Summary

MY shall meet the following BPT requirements:

- 1) Continue to use flow-coaters to apply gelcoat and resin when laminating hulls and decks when feasible. This application technology limits the contact of resin to air which will help to minimize VOC and PM emissions;
- 2) Train employees and continue use of a controlled spray program for gelcoat and resin application;

- 3) Continue to use the vacuum infusion/closed molding to laminate core materials in the fabrication of hulls and decks when feasible;
- 4) Continue current research and manufacturing test trials of pollution prevention technologies such as low styrene resins, vapor suppressants and water based or low vapor pressure cleaning solvents.
- 5) Continue to use high volume low pressure (HVLP) spray equipment when feasible, or manual techniques to apply varnish to control VOC emissions;
- 6) Continue to research, test and work with suppliers to identify new varnish and paint alternatives with lower VOC content, and to identify less volatile solvents or water based emulsions for cleanup products;
- 7) When feasible, use lower vapor pressure cleanup solvents;
- 8) Maintain records of VOC/HAP containing chemical usage and emissions facility wide as specified in Specific Condition (17) of this Air Emission License;
- 9) Limit HAP emissions to 9.9 TPY of any individual HAP and 24.9 TPY of total HAPs, both on a 12-month rolling total basis;
- 10) Practice good housekeeping practices such as storing all materials not in use in containers secured with lids and minimizing waste;
- 11) Maintain and replace as necessary the filters on all forced ventilation points that are adjacent to the spray gun operations and are nearby particulate generating activities that exit outside of the building; and
- 12) Maintain proper operation and maintenance on the baghouse. Maintain a log documenting inspection dates, times and reasons for inspections, and maintenance of the baghouse. Maintain a log documenting dates and times that the drums that collect captured particulate matter are emptied.

F. Emission Factors for Styrene and Methyl Methacrylate (MMA)

The U.S. Environmental Protection Agency (EPA) refers to the Unified Emission Factor (UEF) Model to estimate styrene and MMA emissions from fiberglass application in the boat building process. The model contains emission factors presented in a document published by the Composites Fabricators Association (CFA) entitled "Technical Discussion of the Unified Emission Factors for Open Molding of Composites" dated July 23, 2001. The UEF model was developed as part of a research effort that merged data and emission equations from

independent test programs conducted by the CFA and National Marine Manufacturers Association (NMMA).

The UEF emission data takes into account various factors such as ambient air temperature, gel time, exposed surface area, resin temperatures, and the air velocity across the lamination area. These factors can all influence VOC emissions from fiberglass boat manufacturing operations, and as such, the UEF emission factors are used as the best estimation currently available for use of actual styrene and MMA emissions for all boats and variable environmental conditions.

Even though MY primarily uses closed molding via vacuum infusion, emission factors are based on open molding due to the facility having no licensed limitations on the percentage of closed molding that occurs at the facility. Therefore, the potential to emit (PTE) styrene and MMA is based on open molding which yields higher emissions than closed molding processes.

G. 40 CFR Part 63 Subpart VVVV

On August 22, 2001 the EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing. The NESHAP requires all major sources of HAPs to meet emission standards that reflect Maximum Achievable Control Technology (MACT). MY may have the potential to emit VOC and HAPs above the major source threshold; however, the facility has maintained an air emission license with the State of Maine to be considered a synthetic minor with federally enforceable emission limits below major source thresholds since 2002.

H. Record Keeping

As part of BPT for VOCs and HAPs control, MY shall maintain and make available upon request a current list of all materials in use, including resins, gelcoats, putties, coatings and cleaners. This list shall provide the necessary data to determine compliance, including the following:

- a) The amount and type of each material used on a monthly basis.
- b) The VOC and HAP contents of each material on a percent by weight basis or pounds per gallon (lbs/gal) basis.

The monthly totals of VOCs and HAPs shall be calculated and tracked by MY on a 12-month rolling total basis. UEF emission factors shall be used to estimate actual styrene and MMA emissions. MY shall maintain these records for 6 years and make them available to the Department upon request.

I. Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed an opacity of 20%, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20% in any one (1) hour.

J. General Process Emissions

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

K. Annual Emissions

1. Total Annual Emissions

MY shall be restricted to the following annual emissions, based on a 12-month rolling total.

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

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	Single HAP	Total HAPs
Facility Processes	--	--	--	--	--	24.9	9.9	24.9
Total TPY	--	--	--	--	--	24.9	9.9	24.9

2. Greenhouse Gases

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

Since the facility does not operate any significant fuel-burning units, the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, do not apply to MY.

MY is below the major source threshold of 100,000 tons of CO₂e per year; therefore, no additional licensing requirements are needed to address GHG emissions 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. Based on the information available in the file and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source. Based on the above total facility licensed emissions, MY is below the emissions level required for modeling and monitoring.

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-824-71-C-R 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

- (16) MY shall limit individual HAP emissions to 9.9 TPY, total HAP emissions to 24.9 TPY and VOC emissions to 24.9 TPY (all based on a 12-month rolling total), based on chemical purchases as specified in Condition (17) and calculations and emission factors as determined in accordance with Condition (18). [06-096 CMR 115, BPT]
- (17) To ensure compliance with annual emission limits, MY shall record on a monthly basis, the quantity of raw materials purchased, in stock and disposed of offsite which contain VOC and HAPs. My shall also maintain records of the content on a percent VOC and HAP by weight basis for each material or the pounds VOC and HAP per gallon of each material. Monthly inventory data shall be used to determine the quantity of each material used per month. With the exception of styrene and methyl methacrylate (MMA) emissions from the application of gelcoats, resins and putties, the following equations will be used to calculate VOC and HAP emissions on a monthly and 12-month rolling total basis [06-096 CMR 115, BPT]:

Total VOCs

$$\text{Emissions} = \sum_{i=1}^n \left[\left(\begin{array}{l} \text{Quantity in stock at beginning of the month} \\ - \text{Quantity in stock at the end of the month} \\ + \text{Monthly product purchases} \\ - \text{Monthly hazardous waste removed from site} \end{array} \right) \times \text{VOC content} \right]$$

Where:

n = the number of different gelcoats, resins, putties, coatings and cleaners used in stock at the facility

Individual HAP

$$\text{Emissions} = \sum_{i=1}^n \left[\begin{array}{l} \text{Quantity in stock at beginning of the month} \\ - \text{Quantity in stock at the end of the month} \\ + \text{Monthly product purchases} \\ - \text{Monthly hazardous waste removed from site} \end{array} \right] \times \text{HAP content}]$$

Where:

n = the number of different materials (gelcoats, resins, putties, coatings and cleaners) that contain the individual HAP

Combined HAPs

$$\text{Emissions} = \sum_{i=1}^n \left[\begin{array}{l} \text{Quantity in stock at beginning of the month} \\ - \text{Quantity in stock at the end of the month} \\ + \text{Monthly product purchases} \\ - \text{Monthly hazardous waste removed from site} \end{array} \right] \times \text{HAP content}]$$

Where:

n = the number of different gelcoats, resins, putties, coatings and cleaners used in stock at the facility

- (18) MY shall calculate styrene and MMA emissions from the application of gelcoats, resins and putties on a 12-month rolling total basis using the Unified Emission Factor Model for open molding of composites. [06-096 CMR 115, BPT]
- (19) MY shall develop and implement procedures to promote "good housekeeping" practices (close lids, proper storage of open containers, etc.) and ensure that all VOC containing materials are handled properly to minimize emissions. The procedure shall ensure that all VOC containers are properly sealed when not in immediate use, and that all VOC containers are handled in a manner to reduce the chance of spills. MY shall conduct and log monthly self-inspections of each area to minimize emissions. [06-096 CMR 115, BPT]
- (20) MY shall use the closed-mold method (i.e., vacuum infusion) to minimize VOC emissions from resin application whenever feasible. [06-096 CMR 115, BPT]
- (21) MY shall continue to use flow-coaters to apply gelcoats and resins when laminating hulls and decks to minimize VOC emissions whenever feasible. [06-096 CMR 115, BPT]
- (22) MY shall train employees on and continue use of a controlled spray program for gelcoat application. An annual report documenting employee training and the controlled spray program for the previous year shall be available for inspection by the Department upon request. [06-096 CMR 115, BPT]

- (23) MY shall continue to use high volume low pressure (HVLP) spray equipment, when feasible, or manual techniques to apply varnish to minimize VOC emissions. [06-096 CMR 115, BPT]
- (24) MY shall continue research and manufacturing test trials of pollution prevention technologies (low styrene resins, closed mold systems, low VOC cleanup solvents, etc.). An annual summary documenting the research and test trials results for the previous year shall be available for inspection by the Department upon request. [06-096 CMR 115, BPT]
- (25) **Visible emissions**
1. Visible emissions from bag filters shall be limited to 10% opacity based on a 6-minute block average and 5% opacity based on a 6-minute block average from spray booth filters. [06-096 CMR 101]
 2. Visible emissions from the baghouse shall not exceed an opacity of 10% on a 6-minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. The facility shall take corrective action if visible emissions from the baghouse exceed 5% opacity. [06-096 CMR 101]
- (26) MY shall properly maintain all dust collection equipment in the facility and make repairs as necessary to prevent or minimize system leakage. MY shall perform such housekeeping and clean up as is necessary to prevent or minimize fugitive emissions. MY shall conduct and log monthly self-inspections of each area to minimize emissions. [06-096 CMR 115, BPT]
- (27) MY shall maintain proper operation and maintenance of the baghouse. MY shall maintain a log documenting inspection dates, times and reasons for inspections, and maintenance of the baghouse. [06-096 Chapter 115, BPT]
- (28) MY shall maintain a log documenting dates and times that the drums that collect the particulate matter from the baghouse are emptied. [06-096 Chapter 115, BPT]
- (29) **Fugitive Emissions**
- Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed an opacity of 20%, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20% in any one (1) hour. [06-096 CMR 101]
- (30) **General Process Sources**
- Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

Morris Yacht, Inc.
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A-824-71-C-R (SM)

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Departmental
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Renewal

- (31) MY 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 26 DAY OF November, 2012.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

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

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/17/2011

Date of application acceptance: 11/7/2011

Date filed with the Board of Environmental Protection:

This Order prepared by Allison M. Hazard, Bureau of Air Quality.

