STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

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COMMISSIONER

The Talaria Company, LLC	)	**Departmental**
d/b/a The Hinckley Company, LLC	)	**Findings of Fact and Order**
Hancock County	)	**Air Emission License**
Southwest Harbor, Maine	)	
A-754-71-E-R (SM)	)	

After review of the air emissions license 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., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

The Talaria Company, LLC d/b/a The Hinckley Company, LLC (Hinckley) has applied for a renewal of their Air Emission License, permitting the operation of emission sources associated with their boat manufacturing yard. The facility is located at 130 Shore Road in Southwest Harbor, Maine.

B. Emission Equipment

Hinckley is authorized to operate the following air emission units:

Fuel Burning Equipment

Unit Identification	Maximum Heat Input Capacity (MMBtu/hr)	Fuel type	Firing Rate (gal/hr)
Boiler #1 (Main Building)	1.9	#2 fuel oil	13.6
Boiler #2 (Main Building)	1.9	#2 fuel oil	13.6
Boiler #3 (64 Building)	1.6	#2 fuel oil	11.4
Boiler #4 (Fiberglass Building)	1.7	#2 fuel oil	12.3
Boiler #5 (Fiberglass Building)	1.8	#2 fuel oil	13
Make-up Air Heater (Production Spray Booth)	2.5	Propane	27.3
Make-up Air Heater (Production Spray Booth)	2.5	Propane	27.3
Make-up Air Heater (Service Spray Booth)	1.3	Propane	14.4

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Note: The Hinckley Company operates other small boilers and heaters less than 1.0 MMBtu/hr heat input capacity and are noted for inventory purposes only.

Process Equipment

Emission Unit	Type of Equip.	2010 Process Rate	Stack	Add-on Control Device
Fiberglass Lamination and Gelcoat Application	Spray guns and vacuum infusion	6,000 lbs of resin and gelcoat used	N/A	None
Assembly and Maintenance	Job shop	variable	N/A	Cyclones
Surface Coating Operations	Spray Guns	7,500 lbs of varnish, paint and putties	N/A	None

Control Device Description

Emission Unit	Control Device	Pollutant Controlled	Capture efficiency	Control Efficiency (%)
Assembly and Maintenance	2 Cyclones	Particulate	unknown	70-80%

C. Application Classification

The application for Hinckley 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 current licensed emission units only and has been processed through Major and Minor Source Air Emission License Regulations, 06-096 CMR 115 (as amended). With the fuel limit on boilers and VOC and HAP limits from the process equipment, the facility is licensed below the major source thresholds and is considered a synthetic minor.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

1. General

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 06-096 CMR 100 (as amended) of the Air

Regulations. 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.

Before proceeding with the control requirements for each unit a general process description is provided to identify where the equipment fits into the process.

2. Process Description

Hinckley is located in Southwest Harbor, Maine. Hinckley's primary activities include boat manufacturing and the operation of a full service boatyard providing maintenance, repair and boat storage. The boats are built using primarily gelcoat, fiberglass and resin. Other raw materials include kevlar, carbon fiber, paint, varnish, wood, foam, etc.

For licensing purposes, the manufacturing process is divided into the following process areas: Fiberglass Lamination and Gelcoat Application, Assembly and Maintenance Activities and Surface Coating Activities.

Fiberglass Lamination and Gelcoat Application

The manufacturing of fiberglass boats at Hinckley begins with hull and deck construction, using a combination of the open contact mold and closed mold methods. This portion of Hinckley's overall boat building process utilizes unsaturated polyester and vinyl ester resins and gelcoats. The resins typically contain a styrene monomer and/or epoxy as the linking agent, which partially volatilize during application and curing. The open contact mold method consists of applying layers of gelcoat or resin impregnated fiberglass reinforcement on an open mold. This process produces the majority of VOC emissions.

The initial step in the lamination process is the spraying of a gelcoat layer on the waxed mold surface. Gelcoating is the application of a layer of resin with no reinforcing materials contained in it. The gelcoat contains unsaturated polyester resin, catalyst, and pigments to create the smooth outer surface of the

hull, deck, or part. Upon applying the gelcoat layer to the desired thickness, an initial layer of reinforced fibers is placed with resin in what is referred to as the "skin-coat". A hose assembly supplies the hand held "chopping" spray gun with resin and catalyst. Fiberglass roving is pulled from bulk containers by the chopper and is guided to the spray gun tip through a series of eyelets on a boom. The fiberglass is applied in 1/2 to 1-inch lengths. The catalyst serves as an initiator of the polymerization reaction. Depending on ambient conditions, an inhibitor may be added to the resin to control gel curing time (i.e. to slow down polymerization reaction time in warm weather). The hull is left to cure following the initial backup layer. After proper curing of the hull, the subsequent layers of reinforced materials such as balsa wood, fiberglass, Kevlar and/or carbon fiber are applied to the hull. The thickness of the lamination depends on both the style of boat and the location within the hull (i.e. high stress areas will have more layers applied). For a part being made using the closed molding technology (vacuum infusion), the structural materials are then covered by plastic and the resin is drawn through the structural materials and allowed to cure. There are no exposed resin surfaces in this closed-mold process; thus VOC emissions are virtually eliminated. An increased rate of polymerization is achieved with the closed mold method relative to an open mold process due to the elimination of airflow across the surface of the product.

Whenever technically and economically feasible, Hinckley uses the closed mold infusion molding process to manufacture the majority of hulls and decks.

Assembly and Maintenance Activities: Including Grinding, Sanding, Buffing, & Welding

Assembly comprises of adhering the deck to the hull, installing equipment including engines, deck hardware, instrument panels, and interior items and built in furniture. Grinding, sanding, machining, and buffing of fiberglass surfaces are performed at this stage. All woodworking and welding are completed on site at Hinckley. VOC emissions result from the use of glues, putties, resins, cleaning solvents, and occasional touch up/repair work. Grinding, buffing, sanding, cutting, etc generate PM_{10} emissions.

In two locations where carpentry and machining operations take place, particulate emissions are controlled by cyclones and vented outside. In other woodworking areas such as the fine sanding room and the joiner shop, internal dust collection systems control and contain particulates preventing these emissions from being vented to the ambient air.

In addition to building boats, Hinckley is a full service boat yard. Hinckley cleans exterior boat surfaces, prepares boat surfaces for painting, and provides maintenance and storage for existing boats. Potential emissions include VOCs from fiberglass and gelcoat repair, adhesives, and cleaning products. VOCs are also emitted from such operations as bottom painting and painting hull topsides and decks that are further described in the Surface Coating Operations section. Particulate matter may be generated from preparing surfaces that need to be repaired or painted.

Surface Coating Operations

Hinckley has several designated areas for varnish and paint application. These include the white paint room, the varnish room, and two spray paint bays where the topsides of finished boats are painted with AWLGRIP® (a durable self-leveling exterior finish paint used in the marine industry).

Additionally, varnishing and painting is 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. Occasionally Hinckley must apply exterior finish paint to boats outside of the designated spray booths.

The varnish room is vented with a large fan in a spray application bay. The exhaust is filtered to control particulate emissions that would otherwise pass through the fan to the outside. All paint in the white paint room is applied by hand. Two windows may be opened in this room to provide ventilation as needed. Fans ventilate the two paint bays, where Hinckley currently applies exterior finish paint using spray guns. Given strict quality control requirements, Hinckley seals the building and filters all incoming air in order to eliminate any particulate that could become entrained in the paint that is applied to the boats.

B. BPT Determination

1. Boiler BPT Findings

Hinckley operates several #2 oil-fired boilers and propane fired make-up air heaters. Due to their sizes, the boilers and heaters 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. Due to the relatively small size of each individual unit, the fuel burning equipment at Southwest Harbor does not warrant the installation of add-on air pollution control devices.

The BPT emission limits for the boilers and heater are based on the following:

PM/PM_{10} – 0.08 lb/MMBtu based on Department particulate matter BPT guidance dated March 8, 2002;
SO_2 – based on firing ASTM D396 #2 fuel oil (0.5% sulfur); 0.5 lb/MMBtu; and 0.02 lb of SO_2/1000 gallons for propane fired units.
NO_X – 0.35 lb/MMBtu based on previous licenses;
CO – 5 lb/1000 gal, AP-42, Table 1.3-1, dated 5/10 for #2 oil and 7.5 lb/1000 gallons for the propane fired units
VOC – 0.2 lb/1000 gal, AP-42, Table 1.3-3, dated 5/10 and 0.8 lb/1000 gallons for the propane fired units;
Opacity – Visible emissions from each boiler shall not exceed 20% opacity on a 6 minute block average, except for no more than one (1) six (6) minute block average in a 3 hour period. Visible emissions from each heater firing propane shall not exceed 10% opacity on a 6 minute block average basis, except for no more than one (1) six (6) minute block average in a 3 hour period.

Hinckley shall be limited to 200,000 gallons/yr of #2 fuel oil and 150,000 gallons per year of propane. Until December 31, 2015, the fuel oil fired in Boiler 1 shall be ASTM D396 compliant #2 fuel oil (maximum sulfur content of 0.5% by weight). Per 38 MRSA §603-A(2)(A)(3), beginning January 1, 2016, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm), and beginning January 1, 2018, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm).

Periodic Monitoring

Periodic monitoring for the boilers and make-up air heaters shall include recordkeeping to document #2 fuel (ASTM D396) and propane used both on a monthly and 12 month rolling total basis. Documentation shall include the type and quantity of fuel used.

40 CFR Part 63 Subpart JJJJJJ

The boilers are subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJJ). The units are considered existing oil and propane boilers each rated less than 10 MMBtu/hr.

For informational purposes, a summary of the current applicable federal 40 CFR Part 63 Subpart JJJJJJ requirements is listed below. At this time, the Maine Department of Environmental Protection has not taken delegation of this area source MACT (Maximum Achievable Control Technology) rule promulgated by EPA, however Hinckley is still subject to the requirements. Notification forms and additional rule information can be found on the following website: http://www.epa.gov/ttn/atw/boiler/boilerpg.html.

a. Compliance Dates, Notifications, and Work Practice Requirements

i. Initial Notification of Compliance

An Initial Notification submittal to EPA was due on September 17, 2011. [40 CFR Part 63.11225(a)(2)]

ii. Boiler Tune-Up Program – Initial and Biennial

(a) A boiler tune-up program shall be implemented to include the tune-up of applicable boilers by March 21, 2012. [40 CFR Part 63.11196(a)(1)]

(b) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; however, the burner must be inspected at least once every 36 months. [40 CFR Part 63.11223(b)(1)]
2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. [40 CFR Part 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
5. Measure the concentration in the effluent stream of CO in parts per million (ppm), by volume, and oxygen in volume percent, before and after adjustments are made. [40 CFR Part 63.11223(b)(5)]

6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of start-up. [40 CFR Part 63.11223(b)(7)

(c) A Notification of Compliance Status shall be submitted to EPA no later than 120 days after conducting the initial boiler tune-up. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]

(d) The facility shall implement a biennial boiler tune-up program after the initial tune-up and initial compliance report has been submitted.

1. Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up. [40 CFR Part 63.11223(a)]
2. The biennial report shall be maintained onsite and submitted to EPA, if requested. The report shall contain the concentration of CO in the effluent stream (ppmv) and oxygen in volume percent, measured before and after the boiler tune-up, a description of any corrective actions taken as part of the tune-up of the boiler, and the type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler. [40 CFR Part 63.11223(b)(6)] The biennial compliance report shall also include the company name and address; a compliance statement signed by a responsible official certifying truth, accuracy, and completeness; and a description of any deviations and corrective actions. [40 CFR Part 63.11225(b)]

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 CFR Part 63 Subpart JJJJJJ including the following [40 CFR Part 63.11225(c)]: copies of notifications and reports with supporting compliance documentation; identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation. Records shall be in a form suitable and readily available for expeditious review.

2. BPT for Process VOC and HAP emissions

Hinckley was issued their initial air license (A-754-71-A-N) on March 3, 1999 which included a BACT analysis. The current air license includes annual emission restrictions for VOC (35 tons) and hazardous air pollutants (9.9 tons for any one HAP and 24.9 tons for total HAPs). The majority of VOC and HAP emissions are attributed to the use of resins, gelcoats, putties, paints, and varnishes in the production and repair of fiberglass boats.

Due to the low concentration of air pollutants and high air flow rates associated with Hinckley's various processes, conventional emission control devices are cost prohibitive. The U.S. Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits (PEL) for styrene is 100 ppm, thus large amounts of ventilation air are necessary in order to operate below the PEL. Add-on VOC control equipment are inefficient at concentrations less than 1000 ppm. Add-on controls used in other VOC emitting industries have not been successfully applied to the boat building industry. Therefore, this BPT analysis addresses potential pollution prevention techniques for VOC and HAP control from the Southwest Harbor facility.

The Hinckley Company calculates VOC and HAP emissions based on monthly purchases of VOC and HAP containing material, which are assumed to be used and 100% volatilized in the month they were purchased. Styrene and methlylmethacrylate emissions are estimated using the Unified Emission Factor (UEF) estimation model for open molding of composites or through the use of a standard emission factor of 1% of available styrene for closed molding processes. All other VOC and HAP emission estimates are on a material balance basis.

Hinckley will meet the following BPT requirements for the control of VOC and HAP emissions:

- Continue to used the closed-mold technology whenever economically and technologically feasible for the manufacture of fiberglass boats and boat parts;
- Use controlled spray techniques when using mechanical sprayers for the application of gelcoats and resins. Hinckley, whenever possible will continue to use HVLP spray equipment and other methods that will increase the paint transfer efficiency as BPT;
- Use manual application methods for open-mold resin processes, when technologically appropriate;

- Limit overall facility-wide VOC emissions to 35 tons per year;
- Limit facility-wide HAP emissions to 9.9 TPY for any single HAP and 24.9 TPY for total HAPs;
- Conduct manufacturing and feasibility test trials of pollution prevention technologies such as low styrene resins and water-based or low vapor pressure cleaning solvents as they become commercially available;
- Maintain good housekeeping practices (i.e., lids on, proper storage of open containers, etc.);
- Maintain records of monthly resin, gel coat, paints, and solvent purchases facility-wide.

As part of BPT for VOC and HAPs control, Hinckley shall maintain and make available upon request, a current list of all resins and cleaning materials in use. This list shall provide the necessary data to determine compliance, including:

a) Resin catalyst, and cleaning materials in use.
b) Percent VOC by weight for each resin and the pounds of VOC per gallon of cleaning materials.
c) The amount and type of resin materials purchased on a monthly basis
d) The amount and type of cleaning materials purchased on a monthly basis

The monthly totals of VOCs and HAPS shall be calculated and tracked on a 12 month rolling average basis.
Hinckley shall maintain these records for 6 years and make them available upon request from the DEP.

In addition to VOC and HAP control, the Hinckley Company proposes the following as meeting BPT for the control of particulate matter (PM) from various boatyard activities:

- Control PM emissions from any surface coating process that vents to the ambient air via vent or duct through the use of a particulate filter such that opacity will not exceed 5% for any one, six minute block average;
- Control PM emissions from any cutting, buffing, grinding, or sanding processes that vents to the ambient air via vent or duct through the use of a particulate filter such that opacity will not exceed 10% for any one, six minute block average;
- Reduce the potential for fugitive PM emissions from any process conducted outside by limiting such activity to periods of calm winds or though the use of a shroud or wind curtain.

3. 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.

C. Annual Emissions

Hinckley shall be restricted to the following annual emissions, based on a 12 month rolling total:

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

Pollutant	Tons/yr
PM	1.7
PM_{10}	1.7
NO_X	5.0
SO_2	3.9
CO	0.6
VOC	35.0
Single HAP	9.9
Total HAPS	24.9

40 CFR Part 63 Subpart VVVV

EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for *Boat Manufacturing for Open Molding Resin and Gel Coat Operations*. The NESHAP requires all major sources of HAPs to meet emission standards that reflect Maximum Achievable Control Technology (MACT). Hinckley has federally enforceable emissions limits on VOC and HAPs and has applied to be synthetic minor below the major source and MACT applicability thresholds.

40 CFR Part 63 Subpart II

EPA promulgated the National Emission Standards for Shipbuilding and Ship Repair (Surface Coating). The provisions of this subpart apply to shipbuilding and ship repair operations at any facility that is a major source. Hinckley has federally enforceable emissions limits on VOC and HAPs and has applied to be synthetic minor below the major source and MACT applicability thresholds.

06-096 CMR 159

Hinckley reviewed compliance with the new regulation, 06-096 CMR 159 "Control of Volatile Organic Compounds from Adhesives and Sealants". This regulation limits emissions of volatile organic compounds (VOCs) from adhesives, sealants and primers through two basic components: sale and manufacture restrictions that limit the VOC content of specified adhesives, sealants and primers sold in the state; and use restrictions that apply primarily to commercial/industrial applications. All adhesives and sealants in use at Hinckley are either compliant with the new rule or are exempt from the rule.

III. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations 06-096 CMR 115 (as amended), the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Modeling and monitoring are not required for a renewal if the total emissions of any pollutant released do not exceed the following:

Pollutant	Tons/Year
PM	25
PM_{10}	25
SO_2	50
NO_x	100
CO	250

Based on the above total facility emissions, Hinckley 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,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-754-71-E-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) Oil-fired Boilers and Propane fired heaters

A Fuel

1. Total fuel use for the oil-fired boilers shall not exceed 200,000 gallons/year of #2 fuel oil and total fuel use for the propane fired heaters shall not exceed 150,000 gallons/year, each based on a 12 month rolling total basis.
2. Until December 31, 2015, the #2 fuel oil fired in the boilers shall be ASTM D396 compliant (max. sulfur content of 0.5% by weight). [06-096 CMR 115, BPT]
3. Beginning January 1, 2016, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm). [38 MRSA §603-A(2)(A)(3)]
4. Beginning January 1, 2018, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm). [38 MRSA §603-A(2)(A)(3)]
5. Compliance shall be demonstrated by fuel records from the supplier showing the quantity and type of oil. Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 CMR 115, BPT]

B. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
Boilers and Heaters	PM	0.08	06-096 CMR 115, BPT

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

Pollutant	(Propane units) lb/hr *	(Oil-fired boilers) lb/hour **
PM	0.10	0.23
PM_{10}	0.10	0.23
SO_2	0.01	0.68
NOx	0.37	0.38
CO	0.05	0.07
VOC	0.10	0.02

* Note the calculated maximum lb/hour emission limit is based on the largest propane unit, operating at 2.5 MMBtu/hr.

** Note the calculated maximum lb/hour emission limit is based on the largest oil-fired boiler, operating at 1.9 MMBtu/hr.

D. Visible Emissions

1. Visible emissions from each boiler firing fuel oil shall not exceed 20% opacity on a 6 minute block average, except for no more than one (1) six (6) minute block average in a 3 hour period. [06-096 CMR 101]

2. Visible emissions from each heater firing propane shall not exceed 10% opacity on a 6 minute block average basis, except for no more than one (1) six (6) minute block average in a 3 hour period. [06-096 CMR 101]

(17) Hinckley shall maintain the filters on the spray paint booths to minimize PM emissions and keep opacity to less than 5%, based on a 6-minute block average. Hinckley shall record the amount and VOC content (lb VOC/gallon) of all paint purchases. Monthly paint purchases shall be maintained. [06-096 CMR 115, BPT]

(18) Process Emissions

a. Hinckley shall maintain good housekeeping practices (close lids, proper storage of open container, etc.) and control emissions from the entire existing and future processes to less than: 35.0 tons/year of VOC emissions, 9.9 tons/year of a single HAP and 24.9 tons/year of total HAPs.
b. Hinckley shall calculate these emissions on a 12-month rolling total basis, based on the method as specified in Condition (20).

[06-096 CMR 115, BPT]

(19) To ensure compliance with BPT for VOC and HAPS, Hinckley shall record the quantity of resins, gel coats, paints, and solvents used at the facility and also the VOC and HAP content of each, and any other applicable information for each of the following:

A. Monthly Facility Purchases for use at the Southwest Harbor facility
B. Quantity shipped off Site

[06-096 CMR 115, BPT]

(20) The mass balance equation shall be defined as follows to determine monthly VOC emissions for the applicable boat manufacturing departments (utilizing the data collected from Condition (19) and any applicable data:

A. Monthly Facility Purchases
B. Quantity Shipped offsite

Monthly VOC Emissions = (A x VOC content) - (B x VOC content)

When calculating VOC emissions from open molding resin and gel coat procedures, the current version of the American Composites Manufacturers Association (AMCA) emission factors shall be used in the "Monthly VOC Emissions" equation.

The styrene emission rate for the vacuum infusion method is assumed to be 1%.

[06-096 CMR 115, BPT]

(21) To ensure compliance with BPT for VOC control, Hinckley shall continue research and manufacturing test trials of pollution prevention technologies (low styrene resins, closed mold systems, etc.). An annual report documenting the research and test trial results for the previous year shall be available for inspection to the Department by request. [06-096 CMR 115, BPT]

(22) Hinckley shall continue to use airless spray guns for the application of gelcoats and resins and shall replace standard spray guns with high transfer efficiency units such as airless spray equipment and flow coaters as they wear out.
[06-096 CMR 115, BPT]

(23) Hinckley shall properly maintain all dust collection equipment in the facility and make repairs as necessary to prevent system leakage. [06-096 CMR 115, BPT]

(24) Particulate matter emissions from cyclones and spray booth filters are generally unquantified; therefore particulate matter emissions from cyclones shall be limited to 10% opacity based on a 6 minute block average. [06-096 CMR 115, BPT]

(25) **Parts Washer**

Parts washers at Hinckley are subject to Solvent Cleaners, 06-096 CMR 130 (as amended).

A. Hinckley shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]
B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 130]:
   1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
   2. Wipe cleaning; and,

3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.

C. The following standards apply to cold cleaning machines that are applicable sources under Chapter 130.

1. Hinckley shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
   (i) Waste solvent shall be collected and stored in closed containers.
   (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
   (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
   (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
   (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.
   (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
   (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material shall be immediately stored in covered containers.
   (viii) Work area fans shall not blow across the opening of the degreaser unit.
   (ix) The solvent level shall not exceed the fill line.
2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

(26) **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]

(27) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

1) A computer program and accompanying instructions supplied by the Department; or
2) A written emission statement containing the information required in 06-096 CMR 137.

The emission statement must be submitted as specified by the date in 06-096 CMR 137.

(28) Hinckley 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 27th DAY OF October , 2011.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie Loyzim for
PATRICIA W. AHO, 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: November 12, 2009
Date of application acceptance: December 7, 2009

Date filed with the Board of Environmental Protection:

This Order prepared by Edwin Cousins, Bureau of Air Quality

Filed
OCT 28 2011
State of Maine
Board of Environmental Protection