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

DEPARTMENT ORDER

CPK Manufacturing, LLC **Kennebec County** **Augusta, Maine** **A-1117-70-D-R/A**	**Departmental** **Findings of Fact and Order** **Part 70 Air Emission License** **Renewal/Amendment**

FINDINGS OF FACT

After review of the Part 70 License renewal/amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	CPK Manufacturing, LLC
LICENSE TYPE	Part 70 License Renewal Part 70 Significant License Modification
NAICS CODES	326122 (Plastics, Pipe & Pipe Fitting Manufacturing), 326199 (All Other Plastics Product Manufacturing)
NATURE OF BUSINESS	Fiberglass Composite Manufacturing Facility
FACILITY LOCATION	681 Riverside Drive, Augusta, Maine 04330

CPK Manufacturing, LLC (CPK) is a fiberglass composite manufacturing facility that produces fiberglass composite products such as pipes, tanks, and other custom molded items.

CPK has the potential to emit less than 100 tons per year (tpy) of particulate matter (PM), particulate matter under 10 micrometers (PM_{10}), particulate matter under 2.5 micrometers ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC); therefore, the source is classified as a minor source for criteria pollutants.

CPK has the potential to emit 10 tpy or more of a single hazardous air pollutant (HAP); therefore, the source is classified as a major source for HAP.

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

Fuel Burning Equipment

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Max. Firing Rate (gal/hr)	Fuel Type, % sulfur	Manufacture Date	Install. Date	Stack #
Boiler #1	1.67	11.9	Distillate fuel, 0.0015%	1991	1991	1
Air Heater	1.06	12.0	Propane, neg	2007	2007	Fugitive

Process Equipment

Equipment	Production Rate	Materials Used in Process	Pollutants	Primary VOC/HAP
Resin Gun #1	540 lb/hr (each)	Polyester resin, vinyl ester resin, epoxy resin	VOC, HAP	Styrene
Resin Gun #2				
Resin Gun #3				
Resin Gun #4				
Resin Gun #5				
Resin Gun #6				
Resin Gun #7				
Resin Gun #8	1,800 lb/hr			
Resin Gun #9	540 lb/hr (each)			
Resin Gun #10				
Resin Gun #11				
Gel Coat Gun #1	450 lb/hr (each)	Gel coat	VOC, HAP	Styrene, MMA
Gel Coat Gun #2				
Gel Coat Gun #3				
Gel Coat Gun #4				
Gel Coat Gun #5				
Spray Gun #1	30 lb/hr (each)	Polyester resin, vinyl ester resin, epoxy resin	VOC, HAP	Styrene
Spray Gun #2				
Spray Gun #3				
Spray Gun #4				
Spray Gun #5				
Spray Gun #6				
MMA Gun #1	20 lb/min	MMA adhesive	VOC, HAP	MMA
FW #1	80 lb/hr	Polyester resin, vinyl ester resin, epoxy resin	VOC, HAP	Styrene
FW #2	122 lb/hr	Polyester resin, vinyl ester resin, epoxy resin	VOC, HAP	Styrene

CPK operates an aqueous-based parts washer. Since the cleaning solution contains less than 5% VOC, it does not meet the definition of solvent cleaning machine, and there are no applicable requirements in *Solvent Cleaners,* 06-096 C.M.R. ch. 130. Therefore, it is considered an insignificant activity and mentioned for completeness purposes only.

CPK has additional insignificant activities which do not need to be listed in the emission equipment tables above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

C. Acronyms and Units of Measure

BACT	Best Available Control Technology
BPT	Best Practical Treatment
C.F.R.	Code of Federal Regulations
C.M.R.	Code of Maine Rules
CO	Carbon Monoxide
EPA or US EPA	United States Environmental Protection Agency
gal/hr	gallon per hour
HAP	Hazardous Air Pollutants
lb	pound
lb/hr	pounds per hour
lb/MMBtu	pounds per million British Thermal Units
M.R.S.	Maine Revised Statutes
MMA	Methyl Methacrylate
MMBtu	Million British Thermal Units
MMBtu/hr	million British Thermal Units per hour
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate Matter less than 100 microns in diameter
PM_{10}	Particulate Matter less than 10 microns in diameter
tpy	ton per year
VOC	Volatile Organic Compounds

D. Definitions

Distillate Fuel means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;
- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

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

Closed molding means a grouping of processes for fabricating composites in a way that HAP-containing materials are not exposed to the atmosphere except during the material loading stage (*e.g.,* compression molding, injection molding, and resin transfer molding). Processes where the mold is covered with plastic (or equivalent material) prior to resin application, and the resin is injected into the covered mold are also considered closed molding.

Filament application means an open molding process for fabricating composites in which reinforcements are fed through a resin bath and wound onto a rotating mandrel. The materials on the mandrel may be rolled out or worked by using nonmechanical tools prior to curing. Resin application to the reinforcement on the mandrel by means other than the resin bath, such as spray guns, pressure-fed rollers, flow coaters, or brushes is not considered filament application.

Open molding means a process for fabricating composites in a way that HAP-containing materials are exposed to the atmosphere. Open molding includes processes such as manual resin application, mechanical resin application, filament application, and gel coat application. Open molding also includes application of resins and gel coats to parts that have been removed from the open mold.

Vapor-suppressed resin means a resin containing a vapor suppressant added for the purpose of reducing styrene emissions during curing.

Manual Resin Application. For the purposes of this license and in accordance with 40 C.F.R. Part 63, Subpart WWWW, *manual resin application* means an open molding process for fabricating composites in which composite materials are applied to the mold by pouring or by using hands and nonmechanical tools, such as brushes and rollers. Materials are rolled out or worked by using nonmechanical tools prior to curing. The use of pressure-fed rollers and flow coaters to apply resin is not considered manual resin application.

Mechanical Resin Application. For the purposes of this license and in accordance with 40 C.F.R. Part 63, Subpart WWWW, *mechanical resin application* means an open molding process for fabricating composites in which composite materials (except gel coat) are applied to the mold by using mechanical tools such as spray guns, pressure-fed rollers, and flow coaters. Materials are rolled out or worked by using nonmechanical tools prior to curing.

Operation. For the purposes of this license and in accordance with 40 C.F.R. Part 63, Subpart WWWW, *operation* means a specific process typically found at a reinforced plastic composites facility. Examples of operations include, but are not limited to, noncorrosion-resistant manual resin application, corrosion-resistant mechanical resin application, pigmented gel coat operation, mixing, and HAP-containing materials storage.

Repair. For the purposes of this license and in accordance with 40 C.F.R. Part 63, Subpart WWWW, *repair* means application of resin or gel coat to a part to correct a defect, where the resin or gel coat application occurs after the part has gone through all the steps of its typical production process, or the application occurs outside the normal production area. For purposes of this subpart, rerouting a part back through the normal production line, or part of the normal production line, is not considered repair.

E. Application Classification

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

The application for CPK is for the renewal of their existing Part 70 Air Emission License and subsequent Part 70 amendments, pursuant to Section 2(A) of *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 140.

CPK has also requested incorporation into the Part 70 Air Emission License the relevant terms and conditions of the New Source Review (NSR) licenses issued to CPK pursuant to *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115, including A-1117-77-1-A issued June 15, 2020 and A-1117-77-2-M issued December 2, 2021. Therefore, the license is considered to be a Part 70 License renewal with a Part 70 Significant Modification for the incorporation of NSR requirements.

F. Facility Description

1. VOC Emitting Activities

CPK engages in composite manufacturing for a variety of markets. Products range from industrial fiberglass piping and tanks to custom molded items built from polyester, vinyl ester, and epoxy resins and gelcoats. CPK incorporates a range of composite manufacturing processes, including open contact molding, spray-up lamination,

filament winding, vacuum infusion, and light resin transfer molding, with an emphasis on closed molding operations that minimize emissions whenever feasible.

When open molding or spray-up lamination processes are employed, CPK incorporates a ventilation system that exhausts emissions, consisting primarily of styrene, and provides makeup air within the facility. For a majority of the operations, this system involves inlet ducts that supply outside air and then collection ducts that converge on an exhaust fan and stack. The remainder of the facility incorporates localized wall exhaust fans that include a filter media to capture dust and potential overspray. This system incorporates variable speed fan technology and is adjusted accordingly based on the type of operations being conducted. An emphasis, whenever possible, is placed on incorporating closed molding technology so that styrene emissions are reduced by minimizing the styrene-containing materials' contact with the ambient air prior to polymerization.

2. Non-VOC Emitting Activities

CPK generates fiberglass and wood dust when cutting, drilling, sanding, or grinding cured fiberglass laminates and wooden supports for molds. CPK uses point-of-use dust collection for all fiberglass and wood dust generating activities to minimize emissions of dust to the ambient air. Additionally, CPK utilizes an air filtration system that circulates throughout the facility to capture particles that have escaped the point-of-use collection systems. Wall-based exhaust fans incorporate filters and collection boxes to minimize the exhaust of any remaining dust particles in the ambient air.

G. General Facility Requirements

CPK is subject to the following state and federal regulations listed below in addition to the regulations listed for specific units as described further in this license.

Citation	Requirement Title
06-096 C.M.R. ch. 101	Visible Emissions Regulation
06-096 C.M.R. ch. 102	Open Burning
06-096 C.M.R. ch. 103	Fuel Burning Equipment Particulate Emission Standard
06-096 C.M.R. ch. 105	General Process Source Particulate Emission Standard
06-096 C.M.R. ch. 106	Low Sulfur Fuel Regulation
06-096 C.M.R. ch. 109	Emergency Episode Regulations
06-096 C.M.R. ch. 110	Ambient Air Quality Standards
06-096 C.M.R. ch. 116	Prohibited Dispersion Techniques
06-096 C.M.R. ch. 117	Source Surveillance – Emissions Monitoring
06-096 C.M.R. ch. 140	Part 70 Air Emission License Regulations
40 C.F.R. Part 63, Subpart WWWW	National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

Citation	Requirement Title
40 C.F.R. Part 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
40 C.F.R. Part 70	State Operating Permit Programs

II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

A. Introduction

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

BPT for new sources and modifications is based on the demonstration contained in the underlying NSR license that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts. BACT for FW #2 was addressed in NSR license A-1117-77-1-A (June 15, 2020) and explained in further detail below.

B. NO_x RACT (Reasonably Available Control Technology)

CPK is not subject to *Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides,* 06-096 C.M.R. ch. 138 (NO_x RACT) because CPK's potential to emit NO_x is less than the 100 tons/year applicability threshold.

C. VOC RACT (Reasonably Available Control Technology)

CPK is not subject to *Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds,* 06-096 C.M.R. ch. 134 (VOC RACT) because CPK's potential to emit VOC is less than 40 tons/year.

D. Mandatory Greenhouse Gas (GHG) Reporting

Federal regulation *Mandatory Greenhouse Gas Reporting,* 40 C.F.R. Part 98, which contains GHG reporting and related monitoring and recordkeeping requirements, is applicable to the owners/operators of any facility which falls into any one of the following three categories, pursuant to *General Provisions, Who must report?*, 40 C.F.R. § 98.2.

(a)(1) A facility that contains any source category that is listed in Table A–3 of this subpart in any calendar year starting in 2010

(a)(2) A facility that contains any source category that is listed in Table A–4 of this subpart and that emits 25,000 metric tons CO_2e or more per year in combined emissions from stationary fuel combustion units, miscellaneous uses of carbonate, and all applicable source categories that are listed in Table A–3 and Table A–4 of this subpart.

(a)(3) A facility that in any calendar year starting in 2010 meets all three of the conditions listed in this paragraph (a)(3). For these facilities, the annual GHG report must cover emissions from stationary fuel combustion sources only.

(i) The facility does not meet the requirements of either paragraph (a)(1) or (a)(2) of this section.

(ii) The aggregate maximum rated heat input capacity of the stationary fuel combustion units at the facility is 30 MMBtu/hour or greater.

(iii) The facility emits 25,000 metric tons CO_2e or more per year in combined emissions from all stationary fuel combustion sources.

CPK does not fall into any of the categories listed above and thus is not subject to 40 C.F.R. Part 98.

E. Compliance Assurance Monitoring (CAM)

Compliance Assurance Monitoring, 40 C.F.R. Part 64 is applicable to units at major sources if the unit has emission limits, a control device to meet the limits, and pre-control emissions greater than 100% of the major source threshold (100 tpy for any criteria pollutant).

None of the units at CPK meet all three of the aforementioned requirements; therefore, CPK is not subject to 40 C.F.R. Part 64.

F. Fuel Sulfur Content Requirements

CPK is licensed to fire distillate fuel which, by definition, has a sulfur content of 0.5% or less by weight. Pursuant to 38 M.R.S. § 603-A(2)(A)(3), as of July 1, 2018, no person shall import, distribute, or offer for sale any distillate fuel with a sulfur content greater than 0.0015% by weight (15 ppm). Therefore, the distillate fuel purchased or otherwise obtained for use at this facility shall not exceed 0.0015% by weight (15 ppm).

G. Boiler #1

Boiler #1 is a Burnham Model EW-40 water boiler installed in 1991. Boiler #1 was designed with a maximum heat input capacity of 1.67 MMBtu/hr and combusts distillate fuel. Boiler #1 is operated to provide hot water to the facility.

Emissions from Boiler #1 exit through Stack #1, which has an inside diameter of 0.8 feet and above ground level (AGL) height of 28 feet.

1. Control Equipment

   There is no control equipment associated with Boiler #1.

2. New Source Performance Standards (NSPS)

   Due to its size, Boiler #1 is not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Dc. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more that are constructed after June 9, 1989.

3. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

   With the increase of licensed HAP emissions outlined in NSR A-1117-77-1-A issued on June 15, 2020, CPK is now licensed as a Major Source of HAP. As such, the requirements of 40 C.F.R. Part 63, Subpart JJJJJJ are no longer applicable to Boiler #1 due to the facility no longer being an Area Source of HAP. Boiler #1 is now subject to 40 C.F.R. Part 63, Subpart DDDDD, and its requirements as listed below.

   a. Initial Compliance

      (1) Notification of Change from Subpart JJJJJJ to Subpart DDDDD
      CPK shall submit a notification of the change from Subpart JJJJJJ to Subpart DDDDD applicability to the EPA and the Department within 15 days of the issuance of this license. [40 C.F.R. § 63.9(j)]

      (2) Subpart DDDDD Initial Notification
      CPK shall submit an initial notification of Subpart DDDDD applicability to the EPA and the Department within 15 days of the issuance of this license. [40 C.F.R. § 63.9(b)(2)]

(3) Subpart DDDDD Notification of Compliance Status Report
CPK is not required to submit a Notification of Compliance Status report because they are not required to conduct an initial compliance demonstration as specified in 40 C.F.R. § 63.7530. [40 C.F.R. § 63.7545(e)]

(4) CPK shall provide notice to the EPA and Department that the facility took a permit limit within 30 days of the change. The notification must identify:

(i) The name of the owner or operator of the affected source, the location of the source, the boiler that has switched fuels, were physically changed, or took a permit limit, and the date of the notice.

(ii) The date upon which the fuel switch, physical change, or permit limit occurred.
[40 C.F.R. § 63.11225(g)]

(5) CPK shall submit an Initial Notification to the EPA and the Department within 120 days of the issuance of this license, containing the following:

(i) The name and address of the owner or operator;

(ii) The address (physical location) of the affected source;

(iii) An identification of the relevant standard or other requirement that is the basis of the notification and the source's compliance date;

(iv) A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and

(v) A statement of whether the affected source is a major source or an area source.
[40 C.F.R. § 63.9(b)(2)]

b. Continuing Compliance

(1) CPK shall perform a performance tune-up on Boiler #1 every 5 years from the date of the last tune-up. The tune-up shall consist of the following:

(i) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (CPK may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or

into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

(ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;

(iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (CPK may delay the inspection until the next scheduled unit shutdown);

(iv) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject;

(v) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and

(vi) Maintain on-site and submit, if requested by the EPA Administrator or the Department, a report containing the following information:

1. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;

2. A description of any corrective actions taken as a part of the tune-up; and

3. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.
[40 C.F.R. § 63.7540]

(vii) Each 5-year tune-up specified in § 63.7540 must be conducted no more than 61 months after the previous tune-up.
[40 C.F.R. § 63.7515(d)]

c. Reporting and Recordkeeping

(1) CPK shall submit to the EPA and the Department a compliance report after the end of the year following each 5-year tune-up containing the following information:

(i) Company and Facility name and address.

(ii) Process unit information, emissions limitations, and operating parameter limitations.

(iii) Date of report and beginning and ending dates of the reporting period.

(iv) The date of the most recent tune-up. Include the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.

(v) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

[40 C.F.R. § 63.7550(c)]

(2) The initial compliance report shall cover the period beginning on the compliance date that is specified in 40 C.F.R. § 63.7495 and ending on December 31 within 5 years, after the compliance date that is specified in 40 C.F.R. § 63.7495. [40 C.F.R. § 63.7550(b)(1)]

(3) The compliance report shall cover the previous 5-year periods from January 1st to December 31st. [40 C.F.R. § 63.7550(b)(3)]

(4) The compliance report shall be postmarked no later than January 31st. [40 C.F.R. § 63.7550(b)(4)]

(5) CPK shall maintain a copy of each notification and report submitted to comply with Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report submitted, according to the requirements in § 63.10(b)(2)(xiv). [40 C.F.R. § 63.7555(a)(1)]

(6) Records must be in a form suitable and readily available for expeditious review, according to § 63.10(b)(1). [40 C.F.R. § 63.7560]

(7) As specified in § 63.10(b)(1), CPK shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 C.F.R. § 63.7560]

(8) CPK shall keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). CPK can keep the records off-site for the remaining 3 years. [40 C.F.R. § 63.7560]

4. Emission Limits and Streamlining

a. Criteria Pollutants

For Boiler #1, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested (* denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.13 lb/hr	A-1117-71-A-N (October 24, 2016), BACT	0.13 lb/hr
PM_{10}	0.13 lb/hr	A-1117-71-A-N (October 24, 2016), BACT	0.13 lb/hr
SO_2	0.84 lb/hr (based on 0.5% Sulfur fuel, by weight)	A-1117-71-A-N (October 24, 2016), BACT	0.84 lb/hr
NO_x	0.24 lb/hr	A-1117-71-A-N (October 24, 2016), BACT	0.24 lb/hr
CO	0.06 lb/hr	A-1117-71-A-N (October 24, 2016), BACT	0.06 lb/hr
VOC	0.01 lb/hr	A-1117-71-A-N (October 24, 2016), BACT	0.01 lb/hr

b. Visible Emissions

Visible emissions from Boiler #1 shall not exceed 20% opacity on a 6-minute block average basis. [A-1117-71-A-N (October 24, 2016), BACT]

The BACT visible emission limit listed above is determined to be more stringent than the applicable limit in 06-096 C.M.R. ch. 101. Therefore, the visible emission limit for Boiler #1 has been streamlined to the more stringent BACT limit and only the more stringent limit shall be included in this air emission license.

5. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boiler #1 shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department.

Pollutant	Applicable Emission Limit	Compliance Method	Frequency
PM	lb/hr	40 C.F.R. Part 60, App. A, Method 5	As requested
PM_{10}	lb/hr	40 C.F.R. Part 60, App. A, Method 5 or EPA Test Method 201 or 201A	As requested
SO_2	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO_x	lb/hr	40 C.F.R. Part 60, App. A, Method 7	As requested
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested
VOC	lb/hr	40 C.F.R. Part 60, App. A, Method 25 or 25A	As requested
Visible Emissions	20% opacity on a 6-minute block average basis	40 C.F.R. Part 60, App. A, Method 9	As requested

6. Compliance Assurance Monitoring

CAM is not applicable to Boiler #1.

7. Periodic Monitoring

CPK shall record data and maintain records for the following periodic monitoring values for Boiler #1 as indicated in the following table whenever the equipment is operating.

Boiler #1				
Parameter	Units of Measure	Monitoring Tool/Method	Frequency	
			Monitor	Record
#2 fuel oil sulfur content	Percent, by weight	Fuel receipts from supplier	As Delivered	As Delivered

8. Parameter Monitors

   There are no Parameter Monitors required for Boiler #1.

H. Air Heater

The Air Heater is a CaptiveAire Model CAV20 space heater manufactured and installed in 2007. The Air Heater was designed with a maximum heat input capacity of 1.06 MMBtu/hr and combusts propane. The Air Heater is operated to provide building heat, and emissions from the Air Heater are exhausted inside the building.

1. Control Equipment

   There is no control equipment associated with the Air Heater.

2. New Source Performance Standards (NSPS)

   Due to its size and the fact that the unit does not heat water, the Air Heater is not subject to the NSPS titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Dc. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more that are constructed after June 9, 1989.
   [40 C.F.R. §60.40(c)(a)]

3. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

   The Air Heater does not heat water. It does not meet the definition of a "boiler" and therefore is not subject to *NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, 40 C.F.R. Part 63, Subpart DDDDD.
   [40 C.F.R. § 63.7485]

4. Emission Limits and Streamlining

   a. Criteria Pollutants
      For the Air Heater, a listing of potentially applicable emission standards, the origin and authority of the standards, and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.05 lb/hr	A-1117-71-A-N (October 24, 2016), BACT	0.05 lb/hr
PM_{10}	0.05 lb/hr	A-1117-71-A-N (October 24, 2016), BACT	0.05 lb/hr
SO_2	0.01 lb/hr	A-1117-71-A-N (October 24, 2016), BACT	0.01 lb/hr
NO_x	0.15 lb/hr	A-1117-71-A-N (October 24, 2016), BACT	0.15 lb/hr
CO	0.09 lb/hr	A-1117-71-A-N (October 24, 2016), BACT	0.09 lb/hr
VOC	0.01 lb/hr	A-1117-71-A-N (October 24, 2016), BACT	0.01 lb/hr

b. Visible Emissions

Visible emissions from the Air Heater shall not exceed 10% opacity on a 6-minute block average basis. [A-1117-71-A-N (October 24, 2016), BACT]

The BACT visible emission limit listed above is determined to be more stringent than the applicable limit in 06-096 C.M.R. ch. 101. Therefore, the visible emission limit for Boiler #1 has been streamlined to the more stringent BACT limit, and only the more stringent limit shall be included in this air emission license.

5. Emission Limit Compliance Methods

Compliance with the emission limits associated with the Air Heater shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department.

Pollutant	Applicable Emission Limit	Compliance Method	Frequency
PM	lb/hr	40 C.F.R. Part 60, App. A, Method 5	As requested
PM_{10}	lb/hr	40 C.F.R. Part 60, App. A, Method 5 or EPA Test Method 201 or 201A	As requested
SO_2	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO_x	lb/hr	40 C.F.R. Part 60, App. A, Method 7	As requested

Pollutant	Applicable Emission Limit	Compliance Method	Frequency
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested
VOC	lb/hr	40 C.F.R. Part 60, App. A, Method 25 or 25A	As requested
Visible Emissions	20% opacity on a 6-minute block average basis	40 C.F.R. Part 60, App. A, Method 9	As requested

6. Compliance Assurance Monitoring

   CAM is not applicable to the Air Heater.

7. Parameter Monitors

   There are no Parameter Monitors required for the Air Heater.

8. CEMS and COMS

   There are no CEMS or COMS required for the Air Heater.

I. Process Equipment

CPK operates 11 resin guns, five gel coat guns, six spray guns, two filament winders, and one MMA gun for mechanical application of fiberglass resins and gel coats. Additionally, CPK engages in manual resin and gel coat application through the use of brushes or rollers and incorporates closed molding operations whenever feasible.

1. BACT and Pollution Prevention for Process Equipment

   The following requirements were established as BACT for process equipment in air emission license A-1117-71-A-N (October 24, 2016), and the specific requirements for FW #2 were established in NSR License A-1117-77-1-A (June 15, 2020):

   a. BACT summary/conclusions for VOC & HAP emissions from all process equipment:

      (1) Maintain good housekeeping practices, such as keeping lids on storage containers when the material is not being used;

      (2) Limit overall facility-wide VOC emissions from process sources other than FW #2 (facility-wide VOC emissions minus emissions from Boiler #1, the Air Heater, and FW #2) to 24.7 tons per year on a 12-month rolling total basis;

(3) Limit HAP emissions to 9.9 tons per year for any single HAP and 24.9 tons per year for total HAP on a 12-month rolling total basis from all process equipment other than FW #2;

(4) Limit the emissions of VOC and HAP from FW #2 to 7.2 tons/year on a 12-month rolling total basis;

(5) CPK shall only use vapor suppressed resins on FW #2;

(6) Use of closed-molding technology whenever feasible for the manufacture of fiberglass piping, tanks, and other custom molded items;

(7) Maintain records of the names, types, VOC/HAP contents, quantity purchased, and quantity shipped offsite of all resins, gelcoats, and solvents in use at the facility;

(8) Use of the factors found in the most recent version of *Unified Emission Factors for Open Molding of Composites (UEF)* for calculating emissions of styrene and methyl methacrylate from open molding;

(9) Use of the following equations for determining monthly VOC and HAP emissions from fiberglass composite manufacturing processes (excluding open molding of materials where styrene and methyl methacrylate are the only VOCs/HAPs, which are calculated using UEF factors as mentioned above);

(i) Equation 1:

$$\text{Monthly VOC Emissions} = 0.03^{*} \times \sum_{i=1}^{n} (\text{A} \times \text{VOC content}) - (\text{B} \times \text{VOC content})$$

*Only used when calculating VOC emissions from closed molding processes

(ii) Equation 2:

$$\text{Monthly HAP Emissions} = 0.03^{*} \times \sum_{i=1}^{n} (\text{A} \times \text{HAP content}) - (\text{B} \times \text{HAP content})$$

*Only used when calculating HAP emissions from closed molding processes

Where:

- i = each VOC/HAP containing material used at the facility during the month;
- n = the number of VOC/HAP containing materials used at the facility during the month;
- A = monthly facility purchases of VOC and/or HAP containing materials; and
- B = Quantities of VOC and/or HAP containing materials shipped offsite

(10) Use of high transfer efficiency spray guns such as non-atomizing, airless or high volume, low pressure (HVLP) spray equipment for the application of gelcoats and resins;

(11) Provide operator training in the use of controlled spray techniques, including lowest fluid tip pressure techniques, when using mechanical sprayers for the application of gelcoats and resins;

(12) Use manual application methods for open-mold resin processes, when technologically appropriate; and

(13) 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. CPK shall continue to research and develop closed molding applications to increase its use facility-wide. CPK shall document this research and make it available to the Department upon request.

b. BACT summary/conclusions for PM emissions from all process equipment:

(1) Control of PM emissions from the wall-based exhaust fans and the forced ventilation system such that visible emissions from these sources shall not exceed 10% opacity based on a six-minute block average;

(2) Maintain all dust collection and control equipment in good operating condition, and maintain records of all repair and maintenance activities performed on this equipment;

(3) Control of PM emissions from any cutting, buffing, grinding, or sanding processes conducted inside the building that vent to the ambient air via vent or duct through the use of a particulate filter such that visible emissions do not exceed 10% opacity based on a six-minute block average;

(4) Minimize the potential for fugitive PM emissions from any cutting, buffing, grinding, or sanding operations conducted outside by conducting such activities during periods of calm winds or through the use of a shroud or wind curtain; and

(5) Control of PM emissions from fugitive sources such as grinding, sanding, and buffing done outdoors such that visible emissions from these sources shall not exceed 20% opacity, except for no more than five minutes in any one-hour period. Compliance shall be determined by an aggregate of the individual 15-second opacity observations which exceed 20% in any one hour.

2. Control Equipment

   There is no control equipment associated with the process equipment.

3. New Source Performance Standards (NSPS)

   There are no NSPS subparts applicable to the process equipment.

4. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

   CPK is subject to *NESHAP: Reinforced Plastic Composites Production*, 40 C.F.R. Part 63, Subpart WWWW including, but not limited to, the following requirements:

   a. Notifications, Emission Limits, and Work Practice Standard Requirements

      (1) Initial Notification of Compliance

      An Initial Notification was required to be submitted to the EPA no later than 120 days after CPK became subject to the standard. This notice was sent on June 20, 2017. [40 C.F.R. § 63.5905(a) and Table 13(1)]

      (2) Emission Limits

      CPK shall meet the organic HAP emission limits in Table 3 of this subpart that apply to their operations using one of the four options listed below, in accordance with 40 C.F.R. § 63.5810. CPK may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of their emissions to an add-on control. CPK may use different compliance options for the different operations listed in Table 3 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. CPK may switch between the compliance options. When CPK changes to an option based on a 12-month rolling average, the facility must base the average on the previous 12 months of data calculated using the compliance option they are changing to, unless they were previously using an option that did not require the facility to maintain records of resin and gel coat use. In this case, the facility must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

The compliance options available to CPK are as follows:

(i) CPK may demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of this subpart as described in 40 C.F.R. § 63.5810(a);

(ii) CPK may demonstrate, on average, that the facility meets the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type as described in 40 C.F.R. § 63.5810(b);

(iii) CPK may demonstrate compliance with a weighted average emission limit as described in 40 C.F.R. § 63.5810(c); and/or

(iv) CPK may meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type as described in 40 C.F.R. § 63.5810(d).

[40 C.F.R. §§ 63.5796, 63.5805(b), 63.5810, 63.5840 and 63.5900(a)(2)]

(3) Notification of Compliance Status

CPK was required to submit a Notification of Compliance Status to the EPA no later than 30 days after the facility's compliance date. This notice was submitted on September 26, 2018. [06-096 C.M.R. ch. 140, BPT]

(4) Work Practice Standards

CPK shall meet the applicable work practice standards listed in Table 4 of this subpart. Compliance with each work practice standard shall be demonstrated by performing the work practice required for the operation. The work practice standards applicable to CPK include, but may not be limited to, the following: [40 C.F.R. §§ 63.5805(b) and 63.5900(a)(4) and Table 4(2-3)]

(i) CPK shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment (any equipment that directly contacts resin); and

(ii) CPK shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing material storage tanks may be vented as necessary for safety.

b. Recordkeeping Requirements

(1) CPK shall use one of the two following options to calculate the emissions factors used to demonstrate compliance with this subpart:

(i) Use of the equations in Table 1 of this subpart for each open molding operation; or

(ii) Use of site-specific organic HAP emissions factors provided that those emissions factors are incorporated in the facility's air emissions license and are based on actual facility HAP emissions test data.

[40 C.F.R. § 63.5796]

(2) Organic HAP content of resins and gel coats shall be determined by relying on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS) using the procedures below:

(i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens and at 1.0 percent by mass or more for other organic HAP compounds;

(ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, CPK must use the upper limit of the range for determining compliance; and

(iii) If the organic HAP content is provided as a single value, CPK may use that value to determine compliance.

[40 C.F.R. § 63.5797(a-c)]

(3) CPK shall keep the following records:

(i) Resin and gel coat use, organic HAP content, and operation where the resin or gel coat is used (the organic HAP content records may be based on the MSDS or on resin/gel coat specifications supplied by the resin/gel coat manufacturer);

(ii) A copy of each notification and report that has been submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that has been submitted, according to the requirements in 40 C.F.R. § 63.10(b)(2)(xiv);

(iii) All data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Table 3 of this subpart;

(iv) A certified statement that the facility is in compliance with the work practice requirements in Table 4 to this subpart, as applicable; and

(v) CPK shall maintain a log detailing which compliance option(s) the facility is currently using to comply with this subpart and the date the facility began using those compliance option(s). CPK shall update this log each time the compliance option(s) being used changes.

[40 C.F.R. §§ 63.5915(a) and (c-d) and 63.5895(c) and 06-096 C.M.R. ch. 140, BPT]

(4) CPK shall keep records according to the following requirements:

(i) CPK shall begin collecting resin and gel coat use data, organic HAP content, and the operation where the resin or gel coat is used on the facility's compliance date if complying with 40 C.F.R. §§ 63.5810(a) and (d) or before the facility's compliance date if complying with 40 C.F.R. §§ 63.5810(b) or (c);

(ii) CPK shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 C.F.R. § 63.10(b)(1);

(iii) CPK shall keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record;

(iv) CPK shall keep each record onsite for at least two years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records can be kept offsite the remaining three years; and

(v) CPK shall keep records in a form readily accessible.

[40 C.F.R. §§ 63.5800, 63.5840, and 63.5920(a-d)]

c. Semiannual Compliance Report

(1) CPK shall submit semiannual compliance reports according to the following requirements:

(i) The first compliance report shall cover the period beginning on the compliance date and ending on June 30 or December 31, whichever date is

the first date following the end of the first calendar half after the compliance date;

(ii) The first compliance report shall be postmarked or delivered no later than July 31 if the first semiannual compliance period ends on June 30 or January 31 of the following year if the first semiannual compliance period ends on December 31;

(iii) Each subsequent compliance report shall cover either the semiannual reporting period from January 1 through June 30 or from July 1 through December 31;

(iv) All semiannual compliance reports shall be postmarked or delivered no later than July 31 for the semiannual reporting period from January 1 through June 30 or January 31 of the following year for the semiannual reporting period from July 1 through December 31; and

(v) The first and subsequent compliance reports may be submitted according to the dates established in this license rather than according to the dates established above.

[40 C.F.R. § 63.5910(a-b) and Table 14(1)]

(2) Each semiannual compliance report shall contain the following information:

(i) Company name and address;

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

(iii) Date of the report and beginning and ending dates of the reporting period;

(iv) If the facility has changed compliance options, a statement that the facility has changed compliance options; and

(v) One of the following:

1. If there are no deviations from the facility's 12-month rolling organic HAP emissions limit or applicable work practice standards, a statement that there were no deviations from the facility's 12-month rolling organic HAP emissions limit or applicable work practice standards during the reporting period; or

2. For each deviation from the facility's 12-month rolling organic HAP emissions limit or applicable work practice standards, the total operating time of each affected source during the operating period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 C.F.R. §§ 63.5900(b) and 63.5910 and Table 14(1)]

J. Portable Engines

CPK may operate portable engines on-site for maintenance and emergency-only purposes. Depending on their size and age, these engines may be subject to *Visible Emissions Regulation*, 06-096 C.M.R. ch. 101 and *Fuel Burning Equipment Particulate Emission Standard*, 06-096 C.M.R. ch. 103.

Any engine which cannot meet the definition of "portable engine" as defined by this license may be subject to additional State and Federal regulations. A license amendment may be necessary for a portable engine to be reclassified as stationary.

K. Parts Washers

CPK has provided documentation that the cleaning solution being used in the parts washers at their facility contain no HAP or VOC; therefore, the equipment is exempt from *Solvent Cleaners*, 06-096 C.M.R. ch. 130 (Ch. 130) per Section (1)(B). Specific conditions containing formerly applicable requirements of Ch. 130 have been removed in this licensing action.

L. Emission Statements

As of the issuance of NSR A-1117-77-1-A issued on 6/15/20, CPK is subject to emissions inventory requirements contained in *Emission Statements*, 06-096 C.M.R. ch. 137. CPK shall maintain the following records in order to comply with this rule:

1. The amount of distillate fuel fired in Boiler #1 on a calendar year total basis;

2. The amount of liquefied petroleum gas fired in the Air Heater on a calendar year total basis;

3. The sulfur content of the distillate fuel fired in Boiler #1; and

4. Calculations of the VOC and/or HAP emissions from the composites fabrication process on a calendar year total basis.

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

M. Facility Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility's annual air license fee. Only licensed equipment is included, i.e., emissions from insignificant activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included. Maximum potential emissions were calculated based on the following assumptions:

- Operating Boiler #1 for 8,760 hr/yr;
- Operating the Air Heater for 8,760 hr/yr; and
- CPK's estimated maximum process source emissions.

Please note, this information provides the basis for fee calculation only and should not be construed to represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

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

	PM	PM_{10}	SO_2	NO_x	CO	VOC
Boiler #1	0.6	0.6	3.7	1.0	0.3	0.1
Air Heater	0.2	0.2	0.1	0.7	0.4	0.1
Existing Process Sources	-	-	-	-	-	24.7
FW #2	-	-	-	-	-	7.2
Total TPY	**0.8**	**0.8**	**3.8**	**1.7**	**0.7**	**32.1**

III. AMBIENT AIR QUALITY ANALYSIS

According to 06-096 C.M.R. ch. 140, an existing Part 70 source shall be exempt from an impact analysis with respect to a regulated pollutant whose allowable emissions do not exceed the following:

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

Based on facility license allowed emissions, CPK is below the emissions level required for modeling.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this source:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards; and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-1117-70-D-R/A pursuant to 06-096 C.M.R. ch. 140 and the preconstruction permitting requirements of 06-096 C.M.R. ch. 115 and subject to the standard and specific conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to CPK pursuant to the Department's preconstruction permitting requirements have been incorporated into this Part 70 license, except for such conditions that the Department has determined are obsolete, extraneous, or otherwise environmentally insignificant, as explained in the Findings of Fact accompanying this Order. As such, the conditions in this license supersede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 for making such changes and pursuant to the applicable requirements in 06-096 C.M.R. ch. 140.

For each standard and specific condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

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

STANDARD STATEMENTS

(1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 C.M.R. ch. 140]

(2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 140]

(3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 C.M.R. ch. 140]

(4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.
[06-096 C.M.R. ch. 140]

(5) Notwithstanding any other provision 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 C.M.R. ch. 140]

(6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or affect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under

Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated November 20, 2020.

Permit Shield Table

Source	Citation	Description	Basis for Determination
Facility	40 C.F.R. Part 63, Subpart II	NESHAP for Shipbuilding and Ship Repair	Facility does not build or repair ships as defined in the subpart
Facility	40 C.F.R. Part 63, Subpart PPPP	NESHAP for Surface Coating of Plastic Parts and Products	The subpart does not apply to in-mold or gel coating operations that meet the applicability criteria of 40 C.F.R. Part 63, Subpart WWWW
Facility	40 C.F.R. Part63, Subpart VVVV	NESHAP for Boat Manufacturing	Facility is not a boat manufacturing facility as defined in the subpart
Facility	40 C.F.R. Part 63, Subpart HHHHHH	NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources	Facility does not strip paint using methylene chloride nor use coatings containing compounds of chromium, lead, manganese, nickel, or cadmium
Air Heater	40 C.F.R. Part 63, Subpart JJJJJJ	NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources	Air Heater does not heat water and therefore does not meet the definition of a boiler as defined in the subpart
Facility	40 C.F.R. Part 64	Compliance Assurance Monitoring	None of the units at the facility meet all three criteria (emission limits, a control device to meet the limits, and pre-control emissions greater than 100 tons/year)
Facility	06-096 C.M.R. ch. 130	Solvent Cleaners	Facility uses a cleaning solution that contains no VOC or HAP.
Facility	06-096 C.M.R. ch. 162	Control for Fiberglass Boat Manufacturing Materials	Facility does not manufacture hulls or decks of boats and related parts, nor does it build molds to make fiberglass boat hulls or decks and related parts

[06-096 C.M.R. ch. 140]

(7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of three or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to 06-096 C.M.R. ch. 140;

B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or

D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[06-096 C.M.R. ch. 140]

(8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading, and other similar programs or processes for changes that are provided for in the Part 70 license. [06-096 C.M.R. ch. 140]

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 and this license (38 M.R.S. § 347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in 06-096 C.M.R. ch. 140. [06-096 C.M.R. ch. 140]

(3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 C.M.R. ch. 140] **Enforceable by State-only**

(4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to 38 M.R.S. § 353-A.

(5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 C.M.R. ch. 140]
Enforceable by State-only

(6) 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. In addition, the licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license. [06-096 C.M.R. ch. 140]

(7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, 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 the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [06-096 C.M.R. ch. 140]

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

A. Perform stack testing 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;

2. To demonstrate compliance with the applicable emission standards; or

3. Pursuant to any other requirement of this license to perform stack testing.

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

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

[06-096 C.M.R. ch. 140] **Enforceable by State-only**

(9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates 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 C.F.R. Part 60 or other method approved or required by the Department; and

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

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

[06-096 C.M.R. ch. 140] **Enforceable by State-only**

(10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 M.R.S. § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design, or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

C. All other deviations shall be reported to the Department in the facility's semiannual report.

[06-096 C.M.R. ch. 140]

(11) Upon the written request of 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 manner as the Department shall prescribe; and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 C.M.R. ch. 140]

(12) The licensee shall submit semiannual reports of any required periodic monitoring by January 31 and July 31 of each year, or on an equivalent schedule specified in the license. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [06-096 C.M.R. ch. 140]

(13) The licensee shall submit a compliance certification to the Department and EPA annually by January 31 of each year, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:

A. The identification of each term or condition of the Part 70 license that is the basis of the certification;
B. The compliance status;
C. Whether compliance was continuous or intermittent;
D. The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
E. Such other facts as the Department may require to determine the compliance status of the source.

[06-096 C.M.R. ch. 140]

SPECIFIC CONDITIONS

(14) **Boiler #1**

A. Allowable Fuels

1. Boiler #1 is licensed to fire distillate fuel.
[A-1117-71-A-N (October 24, 2016), BACT]

2. CPK shall maintain records of the quantity of fuel consumed on a monthly and 12-month rolling total basis. [06-096 C.M.R. ch. 140, BPT]

B. Fuel Sulfur Content

1. Distillate Fuel
The facility shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm).
[38 M.R.S. § 603-A(2)(A)(3)(a)]

2. Sulfur Content Compliance
Sulfur content compliance shall be demonstrated by fuel records showing the quantity, type, and the percent sulfur of the fuel delivered. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier, certificate of analysis, or testing of the tank containing the fuel to be fired.
[06-096 C.M.R. ch. 140, BPT]

C. Boiler #1 Emission Limits
(Emission limits are on a 1-hour block average basis unless otherwise stated.)

1. Emissions from Boiler #1 shall not exceed the following limits:

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.13	A-1117-71-A-N (October 24, 2016), BACT	**Federally Enforceable**
PM_{10}	0.13	A-1117-71-A-N (October 24, 2016), BACT	**Federally Enforceable**
SO_2	0.84	A-1117-71-A-N (October 24, 2016), BACT	**Federally Enforceable**
NO_x	0.24	A-1117-71-A-N (October 24, 2016), BACT	**Federally Enforceable**
CO	0.06	A-1117-71-A-N (October 24, 2016), BACT	**Federally Enforceable**
VOC	0.01	A-1117-71-A-N (October 24, 2016), BACT	**Federally Enforceable**

D. Visible Emissions

Visible emissions from Boiler #1 shall not exceed 20% opacity on a 6-minute block average basis. [A-1117-71-A-N (October 24, 2016), BACT]

E. Compliance Methods

Compliance with the emission limits listed above shall be demonstrated in accordance with the following methods and frequencies, or other methods and frequencies as approved by the Department [06-096 C.M.R. ch. 140]:

Pollutant	Unit of Emission Standard	Compliance Method	Frequency
PM	lb/hr	40 C.F.R. Part 60, App. A, Method 5	As requested
PM_{10}	lb/hr	40 C.F.R. Part 60, App. A, Method 5 or EPA Test Method 201 or 201A	As requested
SO_2	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO_x	lb/hr	40 C.F.R. Part 60, App. A, Method 7	As requested
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested
VOC	lb/hr	40 C.F.R. Part 60, App. A, Method 25 or 25A	As requested

F. Periodic Monitoring

CPK shall record data and maintain records for the following periodic monitoring values for Boiler #1 as indicated in the following table whenever the equipment is operating.
[06-096 C.M.R. ch. 140, BPT]

Boiler #1				
Parameter	Units of Measure	Monitoring Tool/Method	Frequency	
			Monitor	Record
Distillate fuel sulfur content	Percent, by weight	Fuel receipts from supplier	As Delivered	As Delivered

G. Boiler MACT (40 C.F.R. Part 63, Subpart DDDDD) Requirements for Boiler #1

1. Boiler MACT: Initial Compliance

a. Notification of Change from Subpart JJJJJJ to Subpart DDDDD
CPK shall submit a notification of the change from Subpart JJJJJJ to Subpart DDDDD applicability to the EPA and the Department within 15 days of the issuance of this license. [40 C.F.R. § 63.9(j)]

b. Subpart DDDDD Initial Notification
CPK shall submit an initial notification of Subpart DDDDD applicability to the EPA and the Department within 15 days of the issuance of this license.
[40 C.F.R. § 63.9(b)(2)]

c. CPK shall submit an Initial Notification to the EPA and the Department within 120 days of the issuance of this license, containing the following:

(1) The name and address of the owner or operator;

(2) The address (physical location) of the affected source;

(3) An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;

(4) A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and

(5) A statement of whether the affected source is a major source or an area source.
[40 C.F.R. § 63.9(b)(2)]

2. Boiler MACT: Continuing Compliance

CPK shall perform a performance tune-up on Boiler #1 every 5 years from the date of the last tune-up. The tune-up shall consist of the following:

a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (CPK may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;

c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (CPK may delay the inspection until the next scheduled unit shutdown);

d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject;

e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and

f. Maintain on-site and submit, if requested by the Administrator, a report containing the following information:

(1) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;

(2) A description of any corrective actions taken as a part of the tune-up; and

(3) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.
[40 C.F.R. § 63.7540]

g. Each 5-year tune-up specified in § 63.7540 must be conducted no more than 61 months after the previous tune-up.
[40 C.F.R. § 63.7515(d)]

3. Reporting and Recordkeeping

a. CPK shall submit to the EPA and the Department a compliance report after the end of the year following each 5-year tune-up containing the following information:

(1) Company and Facility name and address.

(2) Process unit information, emissions limitations, and operating parameter limitations.

(3) Date of report and beginning and ending dates of the reporting period.

(4) The date of the most recent tune-up. Include the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.

(5) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
[40 C.F.R. § 63.7550(c)]

b. The initial compliance report shall cover the period beginning on the compliance date that is specified in 40 C.F.R. § 63.7495 and ending on December 31 within 5 years, after the compliance date that is specified in 40 C.F.R. § 63.7495. [40 C.F.R. § 63.7550(b)(1)]

c. The compliance report shall cover the previous 5-year periods from January 1st to December 31st. [40 C.F.R. § 63.7550(b)(3)]

d. The compliance report shall be postmarked no later than January 31st.
[40 C.F.R. § 63.7550(b)(4)]

e. CPK shall maintain a copy of each notification and report submitted to comply with this Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report submitted, according to the requirements in § 63.10(b)(2)(xiv).
[40 C.F.R. § 63.7555(a)(1)]

f. Records must be in a form suitable and readily available for expeditious review, according to § 63.10(b)(1). [40 C.F.R. § 63.7560]

g. As specified in § 63.10(b)(1), CPK shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 C.F.R. § 63.7560]

Please note that Standard Condition (6) requires that all records be maintained for a minimum of 6 years, and the above condition does not supersede that requirement.

h. CPK shall keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). CPK can keep the records off site for the remaining 3 years. [40 C.F.R. § 63.7560]

(15) **Air Heater**

A. Allowable Operation and Fuels

The Air Heater is licensed to fire propane. [A-1117-71-A-N (October 24, 2016), BACT]

B. Emissions shall not exceed the following limits:

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.05	A-1117-71-A-N (October 24, 2016), BACT	**Federally Enforceable**
PM_{10}	0.05	A-1117-71-A-N (October 24, 2016), BACT	**Federally Enforceable**
SO_2	0.01	A-1117-71-A-N (October 24, 2016), BACT	**Federally Enforceable**
NO_x	0.15	A-1117-71-A-N (October 24, 2016), BACT	**Federally Enforceable**
CO	0.09	A-1117-71-A-N (October 24, 2016), BACT	**Federally Enforceable**
VOC	0.01	A-1117-71-A-N (October 24, 2016), BACT	**Federally Enforceable**

C. Visible Emissions

Visible emissions from the Air Heater shall not exceed 10% opacity on a six-minute block average basis. [A-1117-71-A-N (October 24, 2016), BACT]

D. Compliance Methods

Compliance with the emission limits listed above shall be demonstrated in accordance with the following methods and frequencies, or other methods and frequencies as approved by the Department [06-096 C.M.R. ch. 140]:

Pollutant	Unit of Emission Standard	Compliance Method	Frequency
PM	lb/hr	40 C.F.R. Part 60, App. A, Method 5	As requested
PM_{10}	lb/hr	40 C.F.R. Part 60, App. A, Method 5 or EPA Test Method 201 or 201A	As requested
SO_2	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO_x	lb/hr	40 C.F.R. Part 60, App. A, Method 7	As requested
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested
VOC	lb/hr	40 C.F.R. Part 60, App. A, Method 25 or 25A	As requested

(16) **Process Equipment**

A. Process Emissions

1. CPK shall maintain good housekeeping practices (close lids and proper storage of all VOC/HAP containing containers, etc.) and shall limit VOC emissions from process sources other than FW #2 to less than 24.7 tons/year and HAP emissions to less than 9.9 tons/year of any single HAP and 24.9 tons/year of total HAPs from all process sources other than FW #2.

2. CPK shall limit the emissions of VOC and HAP from FW #2 to 7.2 tons/year on a 12-month rolling total basis.

3. CPK shall calculate these emissions on a monthly and 12-month rolling total basis, based on the methods specified in subparts (C) through (E) of this Specific Condition.

[A-1117-71-A-N (October 24, 2016), BACT and A-1117-77-1-A (June 15, 2020), BACT]

B. CPK shall use closed-molding technology whenever feasible for the manufacture of fiberglass piping, tanks, and other custom molded items.
[A-1117-71-A-N (October 24, 2016), BACT]

C. To demonstrate compliance with the tons per year limits for VOC and HAPs, CPK shall record the name, type, VOC/HAP content, quantity purchased, and quantity shipped offsite of all resins, gelcoats, and solvents in use at the facility.
[A-1117-71-A-N (October 24, 2016), BACT]

D. Emissions of styrene and methyl methacrylate from open molding of composites shall be calculated using the factors found in the most recent version of *Unified Emission Factors for Open Molding of Composites (UEF)*, and shall be added to the VOC and HAP totals from closed molding operations found using the method in subpart (E) of this Specific Condition, and the VOC and HAP totals found using the mass balance equations in subpart (E) of this Specific Condition to demonstrate compliance with the tons per year limits for VOCs and HAPs from all process sources.
[A-1117-71-A-N (October 24, 2016), BACT]

E. The mass balance equations described below shall be used to determine monthly VOC and HAP emissions from fiberglass composite manufacturing processes (excluding open molding of materials where styrene and methyl methacrylate are the only VOCs/HAPs, which are covered by subpart (D) of this Specific Condition, above) utilizing the data collected in accordance with Subpart (C) of this Specific Condition and any other applicable data:

$$\text{Monthly VOC Emissions} = 0.03^{*} \times \sum_{i=1}^{n} (\text{A x VOC content}) - (\text{B x VOC content})$$

*Only used when calculating VOC emissions from closed molding processes

$$\text{Monthly HAP Emissions} = 0.03^{*} \times \sum_{i=1}^{n} (\text{A x HAP content}) - (\text{B x HAP content})$$

*Only used when calculating HAP emissions from closed molding processes

Where:

- i = each VOC/HAP containing material used at the facility during the month;
- n = the number of VOC/HAP containing materials used at the facility during the month;
- A = Monthly facility purchases of VOC and/or HAP contining materials
- B = Quantities of VOC and/or HAP containing materials shipped offsite

[A-1117-71-A-N (October 24, 2016), BACT]

F. CPK shall use high transfer efficiency spray guns, such as non-atomizing, airless or high volume, low pressure (HVLP) spray equipment for the application of gelcoats and resins. [A-1117-71-A-N (October 24, 2016), BACT]

G. CPK shall train spray gun operators to use controlled spray techniques, including lowest fluid tip pressure techniques, when using mechanical sprayers for the application of gelcoats and resins and use manual application methods for open-mold resin processes, when technologically appropriate.
[A-1117-71-A-N (October 24, 2016), BACT]

H. CPK shall 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. CPK shall continue to research and develop closed molding applications to increase its use facility-wide. CPK shall document this research and make it available to the Department upon request. [A-1117-71-A-N (October 24, 2016), BACT]

I. CPK shall control PM emissions from all wall-based exhaust fan filters and the forced ventilation system such that visible emissions from those sources do not exceed 10% opacity on a six-minute block average basis.
[A-1117-71-A-N (October 24, 2016), BACT]

J. CPK shall maintain all dust collection and control equipment in good operating condition and maintain records of all repair and maintenance activities performed on this equipment. [A-1117-71-A-N (October 24, 2016), BACT]

K. CPK shall control PM emissions from any cutting, buffing, grinding, or sanding processes conducted inside the building that vent to the ambient air via vent or duct through the use of a particulate filter and a visible emissions limit of no more than 10% opacity on a six-minute block average basis.
[A-1117-71-A-N (October 24, 2016), BACT]

L. CPK shall minimize the potential for fugitive PM emissions from any cutting, buffing, grinding, or sanding operations conducted outside by conducting such activities during periods of calm winds or through the use of a shroud or wind curtain. Visible emissions from these activities shall not exceed 20% opacity, except for no more than five minutes in any one-hour period. Compliance shall be determined by an aggregate of the individual 15-second opacity observations which exceed 20% in any one hour.
[A-1117-71-A-N (October 24, 2016), BACT]

M. CPK shall only use vapor suppressed resins on FW #2.
[A-1117-77-1-A (6/15/20), BACT]

N. *NESHAP: Reinforced Plastic Composites Production*, 40 C.F.R. Part 63, Subpart WWWW

CPK shall meet all applicable requirements in 40 C.F.R. Part 63, Subpart WWWW, including, but not limited to, the following:

1. Emission Limits, and Work Practice Standard Requirements

a. Emission Limits

CPK shall meet the organic HAP emission limits in Table 3 of this subpart that apply to their operations using one of the four options listed below, in accordance with 40 C.F.R § 63.5810. CPK may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of their emissions to an add-on control. CPK may use different compliance options for the different operations listed in Table 3 to this subpart. The necessary calculations must be completed within 30 days after the end of each month. CPK may switch between the compliance options. When CPK changes to an option based on a 12-month rolling average, the facility must base the average on the previous 12 months of data calculated using the compliance option they are changing to, unless they were previously using an option that did not require the facility to maintain records of resin and gel coat use. In this case, the facility must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

The compliance options available to CPK are as follows:

(1) CPK may demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of this subpart as described in 40 C.F.R. § 63.5810(a);

(2) CPK may demonstrate, on average, that the facility meets the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type as described in 40 C.F.R. § 63.5810(b);

(3) CPK may demonstrate compliance with a weighted average emission limit as described in 40 C.F.R. § 63.5810(c); and/or

(4) CPK may meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type as described in 40 C.F.R. § 63.5810(d). [40 C.F.R. §§ 63.5796, 63.5805(b), 63.5810, 63.5840 and 63.5900(a)(2)]

b. Work Practice Standards

CPK shall meet the applicable work practice standards listed in Table 4 of this subpart. Compliance with each work practice standard shall be demonstrated by performing the work practice required for the operation. The work practice standards applicable to CPK include, but may not be limited to, the following: [40 C.F.R. §§ 63.5805(b) and 63.5900(a)(4) and Table 4(2-3)]

(1) CPK shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment (any equipment that directly contacts resin); and

(2) CPK shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing material storage tanks may be vented as necessary for safety.

2. Recordkeeping Requirements

a. CPK shall use one of the two following options to calculate the emissions factors used to demonstrate compliance with this subpart:

(1) Use of the equations in Table 1 of this subpart for each open molding operation; or

(2) Use of site-specific organic HAP emissions factors provided that those emissions factors are incorporated in the facility's air emissions license and are based on actual facility HAP emissions test data.

[40 C.F.R. § 63.5796]

b. Organic HAP content of resins and gel coats shall be determined by relying on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS) using the procedures below:

(1) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens and at 1.0 percent by mass or more for other organic HAP compounds;

(2) If the organic HAP content is provided by the material supplier or manufacturer as a range, CPK must use the upper limit of the range for determining compliance; and

(3) If the organic HAP content is provided as a single value, CPK may use that value to determine compliance.

[40 C.F.R. § 63.5797(a-c)]

c. CPK shall keep the following records:

(1) Resin and gel coat use, organic HAP content, and operation where the resin or gel coat is used (the organic HAP content records may be based on the MSDS or on resin/gel coat specifications supplied by the resin/gel coat manufacturer);

(2) A copy of each notification and report that has been submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that has been submitted, according to the requirements in 40 C.F.R. § 63.10(b)(2)(xiv);

(3) All data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Table 3 of this subpart;

(4) A certified statement that the facility is in compliance with the work practice requirements in Table 4 to this subpart, as applicable; and

(5) CPK shall maintain a log detailing which compliance option(s) the facility is currently using to comply with this subpart and the date the facility began using those compliance option(s). CPK shall update this log each time the compliance option(s) being used changes.

[40 C.F.R. §§ 63.5915(a) and (c-d) and 63.5895(c) and 06-096 C.M.R. ch. 140, BPT]

d. CPK shall keep records according to the following requirements:

(1) CPK shall begin collecting resin and gel coat use data, organic HAP content, and the operation where the resin or gel coat is used on the facility's compliance date if complying with 40 C.F.R. §§ 63.5810(a) and (d) or before the facility's compliance date if complying with 40 C.F.R. §§ 63.5810(b) or (c);

(2) CPK shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 C.F.R. § 63.10(b)(1);

(3) CPK shall keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record;

Please note that Standard Condition (6) requires that all records be maintained for a minimum of 6 years, and the above condition does not supersede that requirement.

(4) CPK shall keep each record onsite for at least two years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records can be kept offsite the remaining three years; and

(5) CPK shall keep records in a form readily accessible.

[40 C.F.R. §§ 63.5800, 63.5840, and 63.5920(a-d)]

3. Semiannual Compliance Report

a. CPK shall submit semiannual compliance reports according to the following requirements:

(1) The first compliance report shall cover the period beginning on the compliance date and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date;

(2) The first compliance report shall be postmarked or delivered no later than July 31 if the first semiannual compliance period ends on June 30 or January 31 of the following year if the first semiannual compliance period ends on December 31;

(3) Each subsequent compliance report shall cover either the semiannual reporting period from January 1 through June 30 or from July 1 through December 31;

(4) All semiannual compliance reports shall be postmarked or delivered no later than July 31 for the semiannual reporting period from January 1 through June 30 or January 31 of the following year for the semiannual reporting period from July 1 through December 31; and

(5) The first and subsequent compliance reports may be submitted according to the dates established in this license rather than according to the dates established above.

[40 C.F.R. § 63.5910(a-b) and Table 14(1)]

b. Each semiannual compliance report shall contain the following information:

(1) Company name and address;

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

(3) Date of the report and beginning and ending dates of the reporting period;

(4) If the facility has changed compliance options, a statement that the facility has changed compliance options; and

(5) One of the following:

(i) If there are no deviations from the facility's 12-month rolling organic HAP emissions limit or applicable work practice standards, a statement that there were no deviations from the facility's 12-month rolling organic HAP emissions limit or applicable work practice standards during the reporting period; or

(ii) For each deviation from the facility's 12-month rolling organic HAP emissions limit or applicable work practice standards, the total operating time of each affected source during the reporting period, information on the number, duration, and cause of the deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 C.F.R. §§ 63.5900(b) and 63.5910 and Table 14(1)]

(17) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity on a 5-minute block average basis.
[06-096 C.M.R. ch. 101, § 3(C)]

(18) **General Process Sources**

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

(19) **Semiannual Reporting** [06-096 C.M.R. ch. 140]

Note: This semiannual report is separate from, and in addition to, any semiannual report required by specific NSPS or NESHAP regulations.

A. The licensee shall submit to the Department semiannual reports which are due on **January 31st** and **July 31st** of each year. The facility's designated responsible official must sign this report.

B. The semiannual report shall be considered on-time if the postmark of the submittal is on or before the due date or if the report is received by the Department within seven calendar days of the due date.

C. Each semiannual report shall include a summary of the periodic monitoring required by this license.

D. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

(20) **Annual Compliance Certification**

CPK shall submit an annual compliance certification to the Department and EPA in accordance with Standard Condition (13) of this license. The annual compliance certification is due **January 31st** of each year. The facility's designated responsible official must sign this report.

The annual compliance certification shall be considered on-time if the postmark of the submittal is on or before the due date or if the report is received by the Department within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [06-096 C.M.R. ch. 140]

(21) **Annual Emission Statements**

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

B. CPK shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:

1. The amount of distillate fuel fired in Boiler #1 on a calendar year total basis;

2. The amount of liquefied petroleum gas fired in the Air Heater on a calendar year total basis;

3. The sulfur content of the distillate fuel fired in Boiler #1; and

4. Calculations of the VOC and/or HAP emissions from composites fabrication process on a calendar year total basis.

C. Beginning with reporting year 2023 and every third year thereafter, CPK shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). CPK shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3). [38 M.R.S. § 353-A(1-A)]

(22) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

Origin and Authority	Requirement Summary	Enforceability
06-096 C.M.R. ch. 102	Open Burning	-
06-096 C.M.R. ch. 109	Emergency Episode Regulation	-
06-096 C.M.R. ch. 110	Ambient Air Quality Standard	-
06-096 C.M.R. ch. 116	Prohibited Dispersion Techniques	-
38 M.R.S. § 585-B, §§5	Mercury Emission Limit	Enforceable by State-only

(23) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. Examples of such units include refrigerators and any size air conditioners that contain CFCs. [40 C.F.R. Part 82, Subpart F]

(24) **Asbestos Abatement**

When undertaking Asbestos abatement activities, CPK shall comply with the *Standard for Asbestos Demolition and Renovation,* 40 C.F.R. Part 61, Subpart M.

(25) **Expiration of a Part 70 license**

A. CPK shall submit a complete Part 70 renewal application at least six but no more than 18 months prior to the expiration of this air license.

B. Pursuant to Title 5 M.R.S. §10002, and 06-096 C.M.R. ch. 140, the Part 70 license shall not expire and all terms and conditions shall remain in effect until the Department takes final action on the renewal application of the Part 70 license. An existing source submitting a complete renewal application under 06-096 C.M.R. ch. 140 prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license. **Enforceable by State-only**

(26) **New Source Review**

CPK is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emission license, and the NSR requirements remain in effect even if this 06-096 C.M.R. ch. 140 Air Emissions License, A-1117-70-D-R/A, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 12th DAY OF SEPTEMBER, 2022.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____ for ____
MELANIE LOYZIM, COMMISSIONER

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

[Note: If a complete renewal application, as determined by the Department, is submitted at least six but no more than 18 months prior to expiration of the facility's Part 70 license, then pursuant to Title 5 M.R.S. §10002, all terms and conditions of the Part 70 license shall remain in effect until the Department takes final action on the Part 70 license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 12/11/20
Date of application acceptance: 12/14/20

Date filed with the Board of Environmental Protection:

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

FILED

SEP 12, 2022

State of Maine
Board of Environmental Protection