

<b>Dexter Shoe Company</b>	)	<b>Department</b>
<b>Penobscot County</b>	)	<b>Findings of Fact and Order</b>
<b>Dexter, Maine</b>	)	<b>Part 70 Air Emission License</b>
<b>A-175-70-A-I</b>	)	

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant’s file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

**I. Registration**

A. Introduction

FACILITY	Dexter Shoe Company
LICENSE NUMBER	A-175-70-A-I
LICENSE TYPE	Initial Part 70 License
SIC CODES	3143, 3144, 3149
NATURE OF BUSINESS	Men’s & Women’s Leather Footwear Manufacturer
FACILITY LOCATION	71 Railroad Avenue, Dexter
DATE OF LICENSE ISSUANCE	
LICENSE EXPIRATION DATE	

B. Emission Equipment

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

<b>EMISSION UNIT ID</b>	<b>UNIT CAPACITY</b>	<b>UNIT TYPE</b>
Boiler #01	8.4 MMBtu/hr	Fuel Burning
Boiler #02	5.2 MMBtu/hr	Fuel Burning
Boiler #2A	6.2 MMBtu/hr	Fuel Burning
Boiler #03	8.4 MMBtu/hr	Fuel Burning
Boiler #04	9.8 MMBtu/hr	Fuel Burning
Shoe/Sole Surface Preparation	N/A	Process Equipment
Adhesive/Primer Applications	N/A	Process Equipment
Spray Finishing/Coating Applications	N/A	Process Equipment
Sole/Heel/Shoe Prep (Dust Collection)	N/A	Process Equipment
Solvent Degreaser	N/A	Process Equipment
Plant #1 Paint Booth	N/A	Maintenance Equip.

Dexter Shoe Company (Dexter) has additional insignificant activities which do not need to be listed in the emission equipment table above. A list of the insignificant activities and reasons why the activity is considered insignificant can be found in Dexter's Title V application Attachment E submitted on September 29, 1997.

C. Application Classification

The application for Dexter does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

**II. EMISSION UNIT DESCRIPTION**

A. Boilers #01, 02, 2A, 03, 04

Dexter operates Boilers #01, 02, 2A, 03, & 04 for facility space heating only. None of these boilers are subject to the New Source Performance Standards (NSPS) 40 CFR subpart Dc, for boilers with a heat input of 10 MMBtu/hr or greater and manufactured after June 9, 1989.

<b>Emission Unit ID</b>	<b>Heat Input (MMBtu/hr)</b>	<b>Installation Date</b>	<b>Manufacturer</b>	<b>Stack #</b>
Boiler #01	8.4	1973	Cyclotherm	1
Boiler #02	5.2	1965	Cyclotherm	2
Boiler #2A	6.2	1992	Cyclotherm	2A
Boiler #03	8.4	1978	Cyclotherm	3
Boiler #04	9.8	1994	Burnham	4

Dexter also operates several burning units that have heat input capacities less than 1.0 MMBtu/hr and are therefore noted for inventory purposes only.

Streamlining

Opacity

Dexter accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(1) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license.

Particulate Matter

Dexter accepts streamlining for particulate matter requirements. Chapter 103 of the Department's regulations and BPT requirements are applicable. The Best

Practical Treatment (BPT) particulate matter limit is more stringent. Therefore, only the more stringent BPT particulate matter limit is included in this license.

Sulfur Dioxide

Dexter accepts streamlining for sulfur dioxide requirements. Chapter 106 and BPT limits are applicable. The BPT sulfur dioxide limit is more stringent. Therefore, only BPT requirements are included in this license.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes records of fuel use through purchase receipts indicating amounts (gallons) and percent sulfur by weight.

Based on best management practices and the type of fuel for which the boilers were designed, it is unlikely that the boilers will exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

**B. Process Description**

Dexter manufactures soles and shoes at their Railroad Avenue facility in Dexter, Maine. The Railroad Avenue facility is comprised of three manufacturing plants within one complex (Plants #5, 7, & 7A). All plants are located under one roof, with Plant #5 operations being separated from the other plants by the warehouse, prefit, and cutting room. The shoe soles are manufactured (molded) in Plant #7A. Plant #7 is dedicated to preparing the soles for final attachment to the shoes. The cutting room cuts the various shoe parts from leather and lining materials, while prefit prepares and assembles the upper shoe components. Plant #5 is primarily for final shoe assembly.

The manufacturing of shoes consists of several process areas, each with a specific function. The process areas that have similar emissions have been combined into emission units. Dexter's shoe manufacturing process is divided into the following emission units:

<b>Emission Unit #</b>	<b>Process Description</b>	<b>Plant #</b>	<b>Type of Emissions</b>
6	Shoe/Sole Surface Prep.	5	VOC
7	Adhesive/Primer Application	5 / 7	VOC
8	Spray Finishing/Coating/Mold Release	5 / 7 / 7A	VOC
9	Shoe/Heel/Shoe Prep	5 / 7	VOC & PM
10	Solvent Degreaser	5	VOC

C. Shoe/Sole Surface Prep. (EU#6)

The process of manually cleaning, conditioning, dressing and antiquing of various shoe components with rags or sponges, using numerous solvent based and water based cleaners, conditioners and dressing compounds. Duct exhaust systems are provided at the various workstations where these process steps are done in order to facilitate the removal of VOCs from the work areas. These systems exhaust directly to the atmosphere. The following chemicals are used in these operations: mineral spirits, isopropanol, toluene, methyl ethyl ketone, heptane, hexane.

VOC RACT and HAPS

Dexter's VOC RACT for the washing of soles after mold release application is the using of a solvent blend having a VOC content not to exceed 50% by weight when preparing the soles for painting.

D. Adhesives & Primer Applications (EU#7)

Some treatment of the shoes occurs in the priming area, where each sole is primed with a chlorinated solvent mixture, resulting in ethyl acetate emissions. Some of the processes consist of applying primers and adhesives to soles and shoe uppers by hand, with brushes and / or sponges as well as applying the same chemicals with automated machinery or roller type applicators. After priming the soles, heat activated adhesive cement is applied to the upper portion of the sole by machine or hand brush. Some soles also have a cushion insert cemented to the mid-section of the upper side. Following the primer/adhesive process, the soles are air dried in drying tunnels, boxed, and transported to various facilities for final attachment.

The drying tunnels are vented to atmosphere. Fugitive emissions are captured through a variety of metal ductwork and exit through several stacks. General building ventilation also disperses some of the emissions. Bulk primers and adhesives are dispensed from within a chemical storage room, which provides exhaust ventilation and various flammable liquid safety features. The primers and adhesives are dispensed into five-gallon containers, which are transferred to the numerous application points within the facility. During the dispensing process, fugitive VOCs are generated which are exhausted to the atmosphere through a room exhaust system. The storage room also contains a solvent recovery still, which vents directly to the atmosphere while operating.

Most primers and adhesives contain a mixture of various solvents such as: acetone, methyl ethyl ketone, toluene, and ethyl acetate.

VOC RACT

VOC RACT for this emission unit requires Dexter to research and develop low VOC or water based products in an effort to reduce overall emissions. Dexter is

presently researching water born curing agents which would replace some of their VOC adhesives.

Periodic Monitoring

Dexter shall submit a report to the Department on an annual basis which documents this research activity.

E. Spray Finishing/Coating/Mold Release (EU#8)

Dexter manufactures the majority of their soles by two main processes. Injection molding utilizes plastic pellets which are heated to the melting point, injected into sealed molds, and allowed to cool. The soles are then removed from the molds for further processing. The second process is called polyurethane molding which uses a form of isocyanate (MDI) mixed with a polymer to form a reactive mixture. The mixture is immediately poured into an open mold, the mold cover is closed, and the expanding foam is allowed to fill the cavity of the mold to a certain measured density. Prior to each pour, a mold release consisting of a naphtha-based solvent is sprayed into the mold to facilitate removal of the finished sole. The mold release exhaust is fitted with filters for particulate matter control. The majority of VOC emissions created from the mold release exit the facility through an overhead exhaust system.

VOC RACT

Dexter shall operate all spray booths with low pressure high volume spray guns. Dexter shall use a citrus based product to purge the mixing head of the molding operation or use an equivalent lower VOC containing product which does not exceed 1% VOC by weight.

Opacity

Dexter accepts streamlining for opacity requirements on the mold release exhaust. Chapter 101 Section 2(C) applies however, the Best Practical Treatment (BPT) particulate matter limit in this license is more stringent. Therefore, BPT for particulate matter emissions from the mold release exhaust filters shall be limited to 10% opacity.

F. Sole/Heel/Shoe Prep.

This emission unit is comprised of eight cyclone collectors which capture and control particulate matter emissions from sole/heel/shoe roughing, grinding, shaving, trimming, and buffing operations. Dexter uses paint arrestor filters to control particulate emissions from spray booths.

Opacity

Dexter accepts streamlining for opacity requirements on their cyclone scrubbers from sole/heel/shoe prep. Chapter 101, Section 2(C) applies however, the BPT particulate matter limit in this license is more stringent. Therefore, BPT for

particulate matter emissions shall be limited to 10% opacity from the cyclones and the spray booths.

G. Solvent Degreaser (EU#10)

Dexter uses a 30-gallon drum circulation parts washer that has the potential to emit VOCs. Chapter 130 applies to this emission unit.

Periodic monitoring

Periodic monitoring for the degreaser units shall consist of recordkeeping including records of solvent added and removed.

H. Plant #1 Paint Booth

Dexter has a paint booth in a building (Plant #1) separate from the rest of the manufacturing operations. This paint booth is used sparingly for maintenance projects associated with the upkeep of the production equipment and is therefore categorically exempt per MEDEP Chapter 115, Appendix B(12) and is mentioned for inventory purposes only.

I. VOC RACT

In accordance with MEDEP Chapter 134, Dexter opted to take the alternative VOC RACT analysis Option. Please note that the emission estimates assume that all compounds that are classified as VOCs evaporate. While this approach may overestimate the VOC emissions, it remains the most reliable approach to documenting VOC use and reduction.

Reductions in VOCs have taken place because of the replacement of high VOC content solvents with citrus based solvents or other alternatives.

Styles of shoes are purely market driven and the use of more adhesives could potentially return in the future, therefore this issue was considered by the Department in the evaluation of VOC RACT for Dexter.

The Department has determined that the current operating practices represent RACT for the Dexter facility:

A. The total VOC emissions from the Dexter facility shall not exceed:

1. 0.028 lbs VOC emitted per unit of product produced, on a 12 month rolling average basis and 0.040 lbs VOC emitted per unit of product produced during any one calendar month, where:

- a. the pounds of VOC emissions are calculated by recording the VOC content ( i.e. lb/gal) of all material issued and by recording the amount

(i.e. gallons) of VOC containing material issued at the facility. Dexter shall maintain records of the following:

- A. Beginning of month facility storage inventory
- B. Monthly facility issuance
- C. End of month facility storage inventory
- D. Quantity added to offsite disposal drum

NOTE: Recycled material is only counted once upon first issuance. Facility means the total from all plants at the Railroad Avenue facility (#5, #7, #7A). Issuance means the chemicals which are purchased by Dexter and then issued to be used at the Railroad Avenue facility.

VOC emissions from Dexter shall be defined as follows, based on the information gathered from A through D above:

$$\text{Monthly VOC Emissions} = (A \times \text{VOC content}) + (B \times \text{VOC content}) - (C \times \text{VOC content}) - (D \times \text{VOC content})$$

- b. the unit product produced shall be documented by product shipment and storage records. A 'unit product produced' number shall be on a pair basis (i.e. 1 unit product produced = 1 pair of product produced) and will consist of the total number of pairs of footwear (including soles) and the total number of pairs of soles produced; and
  - c. the lbs VOC emitted per unit product produced shall be calculated by dividing (a) by (b) above, on a calendar month and 12 month rolling average basis.
2. 150.0 tons of VOC per year on a 12 month rolling total basis updated monthly, where the tons of VOC emissions are documented by building issue records, which shall include the VOC content of all materials issued.
- B. Dexter shall maintain standard operating and maintenance procedures (SOMP) to minimize VOC & HAP losses, and maintain these procedures at the appropriate locations within the facility. These procedures are as follows:
- 1. A procedure to minimize the volatilization of solvents during the measuring of VOC containing material and/or mixing of VOC containing material.
  - 2. A procedure to minimize VOC fugitive losses from the chemical and solvent storage rooms. Procedures should include methods of securely sealing containers and methods to clean up accidental spills.

3. A procedure to minimize solvent usage or VOC losses during equipment cleanup and during transport (including the transferring of chemicals from the mixing areas to the production lines).

C. For each of the following process areas VOC RACT shall be the following:

1. Shoe/Sole Surface Preparation

For the washing of soles after mold release, Dexter shall replace the use of MEK with a solvent blend which has a VOC content not to exceed 50% by weight.

2. Adhesives/Primer Application

Dexter and their vendors shall continue to research and develop low VOC or water based products in an effort to reduce overall emissions. Dexter shall submit a report to the Department on an annual basis which documents this research activity.

3. Spray Finishing/Coating Applications

Dexter shall operate all spray booths with low pressure high volume spray guns. Dexter shall utilize a citrus based product to purge the mixing head of the molding operation or use an equivalent lower VOC containing product which does not exceed 1% VOC by weight.

4. Solvent Degreaser

- A. Dexter shall label the parts washer with operational standards, equip the washer with a cover if vapor pressure > 15mmHg at 100°F, close cover when not in use, drain parts for 15 seconds or longer, keep drafts <40 m/minute, repair leaks, and keep records of solvent added and removed. Dexter shall not degrease porous material. [MEDEP, Chapter 130]

- B. Dexter shall use solvent with a VOC content of 10% or less and shall maintain records of the percent VOC of the solvent added to the parts washer.

I. Facility Emissions

**Total Allowable Annual Emissions for the Facility**  
(used to calculate the license fee)

<b>Pollutant</b>	<b>Tons/Year</b>
PM	5.9
PM <sub>10</sub>	5.9
SO <sub>2</sub>	24.9
NO <sub>x</sub>	24.5
CO	1.8
VOC	75.0

**III. AIR QUALITY ANALYSIS**

According to Chapter 140 of the Department's regulations, 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:

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

Based on facility license allowed emissions, Dexter is below the emissions level required for modeling and monitoring.

**ORDER**

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

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

Dexter Shoe Company	)	Department
Penobscot County	)	Findings of Fact and Order
Dexter, Maine	)	Part 70 Air Emission License
A-175-70-A-I	10	

The Department hereby grants the Part 70 License A-175-70-A-I, subject to the following conditions:

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

**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 emission 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;
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; **Enforceable by State-only**
- (5) The licensee shall pay the annual air emissions license fee to the Department, calculated pursuant to Title 38 MRSA §353;
- (6) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;
- (7) 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; **Enforceable by State-only**

(8) **Record Keeping**

- The licensee shall maintain sufficient records, to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;
- (9) 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.
- (10) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.
- (11) 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;
- (12) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- (a) perform stack testing under circumstances representative of the facility's normal process and operating conditions:
    - (i) 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;
    - (ii) to demonstrate compliance with the applicable emission standards; or
    - (iii) pursuant to any other requirement of this license to perform stack testing.
  - (b) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emissions testing; and

- (c) submit a written report to the Department within thirty (30) days from the date of test completion.

**Enforceable by State-only**

- (13) 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 CFR Part 60 or other method approved or required by the Department; and
  - (b) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
  - (c) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

**Enforceable by State-only**

- (14) 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.
- (15) 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 effect 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.

- (16) 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.
- (17) 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. The licensee shall notify the Department within two (2) days or the next working day, whichever is later, of such occasions and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation.
- (18) 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.
- (19) The licensee shall submit quarterly reports of any required monitoring. 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.
- (20) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequent if specified in the Applicable requirement 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;
- (21) 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 the Part 70 major source with a remaining Part 70 license term of 3 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 Chapter 140;
  - (b) Additional requirements (including excess emissions requirements) become applicable to the 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 emission standards or other terms of 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.

(22) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading or other similar programs or processes for changes that are provided for in the Part 70 license.

**SPECIAL CONDITIONS**

(23) **Permit Shield for Non-Applicable Requirements**

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated September 23, 1997.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
a.	Boilers #01, 02, 2A, 03, 04	40 CFR Part 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Heat Inputs less than 10MMBtu/hr.
b.	Facility	Chapter 129	Surface Coating Facilities	Dexter does not operate activities subject to this regulation.

(24) **Boilers #01, 02, 2A, 03, 04**

- A. Dexter is licensed to operate Boilers #01 (8.4 MMBtu/hr), #02 (5.2 MMBtu/hr), #2A (6.2 MMBtu/hr), #03 (8.4 MMBtu/hr), and #04 (9.8 MMBtu/hr) which are licensed to fire #2 fuel oil. [MEDEP Chapter 140, BPT]
- B. The sulfur content of the fuel oil fired shall not exceed 0.5% by weight demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT]
- C. Facility shall fire only #2 fuel oil in each boiler. [MEDEP Chapter 140, BPT]  
**Enforceable by State-only**
- D. Emissions from Boilers #01 & 03 shall each not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	MEDEP Chapter 140, BPT	-

<b>Pollutant</b>	<b>lb/hr (each)</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	1.01	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
PM <sub>10</sub>	1.01	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
SO <sub>2</sub>	4.26	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
NO <sub>x</sub>	4.20	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
CO	0.30	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
VOC	0.02	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>

E. Emissions from Boiler #02 shall not exceed the following limits:

<b>Pollutant</b>	<b>lb/MMBtu</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	0.12	MEDEP Chapter 140, BPT	-

<b>Pollutant</b>	<b>lb/hr</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	0.62	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
PM <sub>10</sub>	0.62	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
SO <sub>2</sub>	2.64	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
NO <sub>x</sub>	2.60	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
CO	0.19	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
VOC	0.01	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>

F. Emissions from Boiler #2A shall not exceed the following limits:

<b>Pollutant</b>	<b>lb/MMBtu</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	0.12	MEDEP, Chapter 103, Section 2(B)(1)(a)	-

<b>Pollutant</b>	<b>lb/hr</b>	<b>Origin and Authority</b>	<b>Enforceability</b>
PM	0.74	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
PM <sub>10</sub>	0.74	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
SO <sub>2</sub>	3.14	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
NO <sub>x</sub>	3.10	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
CO	0.22	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
VOC	0.02	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>

G. Emissions from Boiler #04 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	MEDEP Chapter 140, BPT	-

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	1.18	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
PM <sub>10</sub>	1.18	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
SO <sub>2</sub>	4.97	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
NO <sub>x</sub>	4.90	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
CO	0.35	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>
VOC	0.02	MEDEP Chapter 140, BPT	<b>Enforceable by State-only</b>

H. Dexter shall operate the boilers such that the visible emissions from each stack does not exceed 30% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period. [MEDEP Chapter 140, BPT]

I. Dexter shall maintain records of annual #2 fuel use indicating the quantity of fuel consumed (gallons), the percent (%) sulfur content of the fuel by weight, and the heat content of the fuel, demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT]

J. Dexter shall not exceed a total facility fuel use of 700,000 gal/yr (12 month rolling total) of #2 fuel oil. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

(25) **VOC RACT Limits and Requirements [MEDEP Chapter 134, VOC RACT]**

The Department has determined that the current operating practices represent RACT for the Dexter facility:

A. The total VOC emissions from the Dexter facility shall not exceed:

1. 0.028 lbs VOC emitted per unit product produced, on a 12 month rolling average basis and 0.040 lbs VOC emitted per unit product produced during any one calendar month, where:

a. the pounds of VOC emissions are calculated by recording the VOC content ( i.e. lb/gal) of all material issued and by recording the amount (i.e. gallons) of VOC containing material issued at the facility. Dexter

shall maintain records of the following:

- A. Beginning of month facility storage inventory
- B. Monthly facility issuance
- C. End of month facility storage inventory
- D. Quantity added to offsite disposal drum

NOTE: Recycled material is only counted once upon first issuance. Facility means the total from all plants at the Railroad Avenue facility (#5, #7, #7A). Issuance means the chemicals which are purchased by Dexter and then issued to be used at the Railroad Avenue facility.

VOC emissions from Dexter shall be defined as follows, based on the information gathered from A through D above:

$$\text{Monthly VOC Emissions} = (A \times \text{VOC content}) + (B \times \text{VOC content}) - (C \times \text{VOC content}) - (D \times \text{VOC content})$$

- b. the unit product produced shall be documented by product shipment and storage records. A 'unit product produced' number shall be on a pair basis (i.e. 1 unit product produced = 1 pair of product produced) and will consist of the total number of pairs of footwear (including soles) and the total number of pairs of soles produced; and
  - c. the lbs VOC emitted per unit product produced shall be calculated by dividing (a) by (b) above, on a calendar month and 12 month rolling average basis.
2. 150.0 tons of VOC per year on a 12 month rolling total basis updated monthly, where the tons of VOC emissions are documented by building issue records, which shall include the VOC content of all materials issued.
- B. Dexter shall maintain standard operating and maintenance procedures (SOMP) to minimize VOC & HAP losses, and maintain these procedures at the appropriate locations within the facility. These procedures are as follows:
- 1. A procedure to minimize the volatilization of solvents during the measuring of VOC containing material and/or mixing of VOC containing material.
  - 2. A procedure to minimize VOC fugitive losses from the chemical and solvent storage rooms. Procedures should include methods of securely sealing containers and methods to clean up accidental spills.

3. A procedure to minimize solvent usage or VOC losses during equipment cleanup and during transport (including the transferring of chemicals from the mixing areas to the production lines).

C. For each of the following process areas VOC RACT shall be the following:

1. Shoe/Sole Surface Preparation

For the washing of soles after mold release, Dexter shall use a solvent blend having a VOC content not to exceed 50% by weight when preparing the soles for painting.

2. Adhesives/Primer Application

Dexter and their vendors shall continue to research and develop low VOC or water based products in an effort to reduce overall emissions. Dexter shall submit a report to the Department on an annual basis which documents this research activity.

3. Spray Finishing/Coating Applications

Dexter shall operate all spray booths with low pressure high volume spray guns. Dexter shall utilize a citrus based product to purge the mixing head of the molding operation or use an equivalent lower VOC containing product which does not exceed 1% VOC by weight.

4. Solvent Degreaser

- A. Dexter shall label the parts washer with operational standards, equip the washer with a cover if vapor pressure > 15mmHg at 100°F, close cover when not in use, drain parts for 15 seconds or longer, keep drafts <40 m/minute, repair leaks, and keep records of solvent added and removed. Dexter shall not degrease porous material. [MEDEP, Chapter 130]

- B. Dexter shall use solvent with a VOC content of 10% or less and shall maintain records of the percent VOC of the solvent added to the parts washer.

(26) **Opacity**

- A. Dexter shall continue to use cyclone collectors to capture and control particulate emissions from the sole/heel/shoe prep operations, paint arrestor filters on the paint booths, and filters on the mold release exhaust.

- B. Visible emissions from the cyclones shall not exceed 10% opacity. Visible emissions from the cyclones shall be checked and recorded monthly.

- C. Visible emissions from the paint arrestor filters (spray booths) shall not exceed 10% opacity. Filters in the spray booths shall be changed at least once

per day. Visible emissions from the spray booths shall be checked once per quarter.

D. Visible emissions from the mold release exhaust shall not exceed 10% opacity. Filters on the mold release exhaust shall be changed at least once per day. Visible emissions from the mold release exhaust shall be checked once per quarter.

[MEDEP Chapter 140, BPT]

(27) **Hazardous Air Pollutants (HAPS)**

Dexter shall emit less than 10 ton/year of any single HAP and less than 25 ton/year for all HAPS combined.

(28) **Semiannual Reporting [MEDEP Chapter 140, BPT]**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The initial semiannual report is due October 30, 2000, 30 days from the end of the second calendar quarter following the date of signature of this license.

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

(29) **Annual Compliance Certification**

The licensee shall submit an annual compliance certification to the Department in accordance with Condition (20) of this license. The initial annual compliance certification is due April 30, 2001 with the submittal of the second semiannual report after the signature date of this license. [MEDEP Chapter 140]

(30) **Annual Emission Statement**

The licensee shall annually report to the Department, in a specified format, fuel use, operating rates, use of materials and other information necessary to accurately update the State's emission inventory. [MEDEP Chapter 137]

(31) The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>
Chapter 102	Open Burning
Chapter 109	Emergency Episode Regulation
Chapter 110	Ambient Air Quality Standard
Chapter 116	Prohibited Dispersion Techniques

Dexter Shoe Company ) Department  
Penobscot County ) Findings of Fact and Order  
Dexter, Maine ) Part 70 Air Emission License  
A-175-70-A-I 21

(32) **Certification by a Responsible Official**

All documents and reports (including semiannual reports and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

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

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2000.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 9/29/97

Date of application acceptance: 10/1/97

Date filed with the Board of Environmental Protection \_\_\_\_\_

This Order prepared by Lynn Ross, Bureau of Air Quality.