



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI  
GOVERNOR

DAVID P. LITTELL  
COMMISSIONER

**Hussey Seating Company  
York County  
North Berwick, Maine  
A-374-71-K-M**

**Departmental  
Findings of Fact and Order  
Air Emission License  
Amendment #1**

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

**I. REGISTRATION**

1. Hussey Seating Company (Hussey) was issued Air Emission License A-374-71-J-R on June 14, 2006, permitting the operation of emission sources associated with their spectator seating manufacturing facility.
2. The equipment addressed in this license is located at 38 Dyer Street Ext., North Berwick, Maine.
3. Hussey has requested a minor revision to their license in order to add a natural gas fired emergency generator.

**A. Emission Equipment**

The following equipment is addressed in this air emission license:

**Electrical Generation Equipment**

<u>Equipment</u>	<u>Firing Rate (MMBtu/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Stack #</u>
Generator #1	0.5	Natural Gas	G1
Generator #2*	0.23	Natural Gas	G2
Generator #3*	0.14	Natural Gas	G3

\* Insignificant – listed for equipment inventory completeness only

**B. Application Classification**

This amendment will increase emissions by less than 4 tons per year for each single pollutant and less than 8 tons per year for all pollutants combined. Therefore, this modification is determined to be a minor revision and has been processed as such.

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## II. BEST PRACTICAL TREATMENT (BPT)

### A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (last amended December 24, 2005). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 CMR 100 (last amended December 24, 2005). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

### B. Emergency Generator #1

Hussey operates a 0.5 MMBtu/hr emergency generator. This generator is a Ford ESG-642, 4 cycle, V6 cylinder, natural gas fired, spark ignited generator. The generator was manufactured in 2008 and installed in 2009, therefore, it is not subject to New Source Performance Standards 40 CFR 60.4230, Subpart JJJJ - Standards of Performance for New Stationary Sources.

Emergency generators are only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. Emergency generators are not to be used for prime power when reliable offsite power is available.

A summary of the BACT analysis for Emergency Generator #1 is the following:

1. The emergency generator shall fire natural gas.
2. The emergency generator shall be limited to 500 hours per year of operation based on a 12-month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours.
3. NO<sub>x</sub>, CO, and VOC emission limits are based upon the manufacturer's exhaust emission data.
4. Visible emissions from the emergency generator shall not exceed 20% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period.

C. Annual Emissions

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

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

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>	<b>HAP</b>
Fuel Burning Equipment	8.56	8.56	0.11	16.59	12.78	0.91	-
Diesel Fire Pumps	0.16	0.16	0.02	2.26	0.49	0.18	-
Process Equipment	-	-	-	-	-	8.0	3.0
<b>Generator #1</b>	-	-	-	<b>1.54</b>	<b>0.28</b>	<b>0.07</b>	-

<b>Total TPY</b>	<b>8.7</b>	<b>8.7</b>	<b>0.1</b>	<b>20.4</b>	<b>13.6</b>	<b>9.2</b>	<b>3.0</b>
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**III. AMBIENT AIR QUALITY ANALYSIS**

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

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

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

**ORDER**

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

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

The Department hereby grants Air Emission License A-374-71-K-M subject to the conditions found in Air Emission License A-374-71-J-R and the following:

The following Special Condition (18) shall be inserted after Special Condition (17) of the License and Special Conditions (18) to (22) inclusive of License A-374-71-J-R shall be renumbered (19) to (23) respectively.

**(18) Emergency Generator #1**

- A. Hussey shall limit Emergency Generator #1 to 500 hours per year of operation (based on a 12-month rolling total). An hour meter shall be maintained and operated on the emergency generator. [06-096 CMR 115, BPT]
- B. The emergency generator shall only be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. The emergency generator shall not be used for prime power when reliable offsite power is available. A log shall be maintained documenting the date, time, and reason for operation. [06-096 CMR 115, BPT]
- C. The emergency generator shall fire natural gas. Compliance shall be based on fuel records from the supplier showing the quantity of fuel delivered and the percent sulfur of the fuel. [06-096 CMR 115, BPT]
- D. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

<b>Emission Unit</b>	<b>NO<sub>x</sub> (lb/hr)</b>	<b>CO (lb/hr)</b>	<b>VOC (lb/hr)</b>
Generator #1	6.14	1.12	0.27

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

DONE AND DATED IN AUGUSTA, MAINE THIS 29<sup>th</sup> DAY OF October, 2009.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *David P. Littell*  
DAVID P. LITTELL, COMMISSIONER

**The term of this amendment shall be concurrent with the term of Air Emission License A-374-71-J-R.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 8/27/2009

Date of application acceptance: 9/16/2009

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

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

