

**WahlcoMetroFlex, Inc.** )  
**Androscoggin County** )  
**Lewiston, Maine** )  
**A-654-71-F-N** )  
**Departmental**  
**Findings of Fact and Order**  
**Air Emission License**  
**After-The-Fact**

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

**I. REGISTRATION**

A. Introduction

WahlcoMetroFlex, Inc. (WahlcoMetroFlex) of Lewiston, Maine has applied, after the fact, to renew their Air Emission License permitting the operation of emission sources associated with their Lewiston, Maine metal fabrication facility.

B. Emission Sources

Emission sources at the WahlcoMetroFlex facility include a paint room and a shot blast room.

C. Application Classification

The application for WahlcoMetroFlex does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of current licensed emission units only.

**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 1, 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 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 emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

**B. Process Operations**

WahlcoMetroFlex of Lewiston, Maine primarily manufactures gas flow isolation devices and metal and fabric expansion joints for the industrial community, particularly the gas turbine industry.

**1. Coating operations**

WahlcoMetroFlex makes use of a paint room to undertake surface coating of metal parts produced at the facility. The painting and coating is subject to Maine’s rule *Surface Coating Facilities*, 06-096 CMR 129 (last amended March 3, 1998). WahlcoMetroFlex’s previous Air Emission License restricted VOC emissions from the facility’s coating operations to no greater than 1,666 pounds of VOC per any calendar month, therefore, in accordance with 06-096 CMR 129, Section 1(C), subpart (1), the coating operations at WahlcoMetroFlex are exempt from 06-096 CMR 129. WahlcoMetroFlex shall continue to be restricted to VOC emissions of no greater than 1,666 pounds of VOC per any calendar month from the coating operations.

The regulated pollutants associated with the coating process are VOCs and HAPs. In addition to the monthly VOC emissions restriction from the coating process, WahlcoMetroFlex shall have a total annual VOC emissions limit of 9.9 tons per year (ton/yr) based on a twelve-month rolling total and an annual HAP emissions limit of 9.9 ton/yr based on a twelve-month rolling total. To demonstrate compliance with VOC and HAP emissions limits, WahlcoMetroFlex shall maintain a record of VOC and HAP emissions and coating material use. The record shall include VOC and HAP emissions calculations based on material usage and VOC and HAP content of the material. The record shall also include dates of coating operations, type of coatings used, volume of coatings used and VOC and HAP content of the coatings based on purchase receipts and MSDS sheets. The record shall be maintained on a monthly as well as a twelve-month rolling total.

The paint room is equipped with an exhaust fan that has fiberglass paint arrester pads to collect paint particulate from over spraying. BPT for the spray booth shall be to operate the exhaust fan and keep the paint room door closed during all periods of coating operations. BPT shall also be to maintain the spray booth in good working order. Proper maintenance of the spray booth shall include frequent inspection of the blower equipment and the spray booth filter pads. The spray booth filters shall be maintained in good working order and any spilled or excess coating material shall be cleaned up immediately. A record shall be maintained of spray booth inspections and maintenance, failures and corrective action.

BPT for the storage of the paints, coatings and any solvents associated with the coating process shall be to store the containers properly sealed.

Visible emission from the paint room and exhaust fan shall not exceed 10% on a 6-minute block average.

2. Gluing Process

WahlcoMetroFlex utilizes glue to bond fabric materials together in the production and repair of fabric expansion joints. Currently, WahlcoMetroFlex estimates that the facility uses less than 50 gallons per year of adhesive. WahlcoMetroFlex shall maintain a record of glue usage which shall include glue purchase receipts, glue types and MSDS sheets for the glues being used.

C. Shot Blast Room

WahlcoMetroFlex's previous Air Emission License permitted the operation of a sandblast tent that was located behind the facility's manufacturing building. WahlcoMetroFlex has discontinued use of the sandblast tent and is constructing a new shot blast room to satisfy the facility's sand blast needs. The process will utilize steel shot instead of black beauty and after blasting, the shot will be reclaimed and reused via a floor reclaim system.

Pollutants associated with shot blasting operations are particulate matter (PM) and particulate matter of 10 microns and smaller in size (PM<sub>10</sub>). The room utilizes a dust collection system that will filter exhaust from the shot blast room and return the exhaust to the inside of the facility's manufacturing space. WahlcoMetroFlex shall establish a program of inspection, maintenance and repair for the shot blast room exhaust system that allows for periodic inspection of the exhaust system. WahlcoMetroFlex shall maintain a record of all blast room exhaust system inspections as well as any maintenance and repairs done on the system.

Fugitive particulate matter emissions from the shot blast operation shall be controlled so as to prevent visible emissions in excess of 20% opacity, except for no more than 5-minutes in any one-hour period.

**D. Cold-Cleaning Parts Degreaser**

WahlcoMetroFlex’s previous Air Emission License permitted the operation of a cold-cleaning parts degreaser. The degreaser has been removed and will not be included in this license renewal.

**E. Fuel Burning Equipment**

WahlcoMetroFlex operates several fuel burning units that have heat input capacities below the 1.0 MMBtu/hr licensing threshold. These fuel burning units include the 0.46 MMBtu/hr paint room space heater, two 0.1 MMBtu/hr office space heaters and a 0.05 MMBtu/hr shop space heater. The operation of these units is considered insignificant and the units are listed in this license for inventory purposes only

**F. Annual Emission Restrictions**

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

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

| <b>Pollutant</b> | <b>Tons/Year</b> |
|------------------|------------------|
| PM               | -                |
| PM <sub>10</sub> | -                |
| SO <sub>2</sub>  | -                |
| NO <sub>x</sub>  | -                |
| CO               | -                |
| VOC              | 9.9              |
| HAPs*            | 9.9              |

\* HAPs are identified by the EPA in regulations pursuant to Section 112(b) of the Clean Air Act (CAA).

**III.AMBIENT AIR QUALITY ANALYSIS**

According to *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 1, 2005), the level of air quality analyses required for a minor source shall be determined on a case-by case basis. Based on the information available in the file, and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source. Based on the total facility emissions, the WahlcoMetroFlex 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-654-71-F-N subject the following conditions:

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

**STANDARD CONDITIONS**

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee’s premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (Title 38 MRSA §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 CMR 115. [06-096 CMR 115]

- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 CMR 115]
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353.
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

- (i) perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
    - a. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
    - b. pursuant to any other requirement of this license to perform stack testing.
  - (ii) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
  - (iii) submit a written report to the Department within thirty (30) days from date of test completion.  
[06-096 CMR 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- (i) 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
  - (ii) 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
  - (iii) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions. [06-096 CMR 115]

- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

#### **SPECIFIC CONDITIONS**

- (16) Paint Room
- A. WahlcoMetroFlex shall operate the exhaust fan and keep the paint room door closed during all periods of coating operations. [06-096 CMR 115, BPT]
- B. WahlcoMetroFlex shall maintain the spray booth in good working order. Proper maintenance of the spray booth shall include frequent inspection of the blower equipment and the spray booth filter pads. The spray booth filters shall be maintained in good working order and any spilled or excess coating material shall be cleaned up immediately. [06-096 CMR 115, BPT]
- C. A record shall be kept of spray booth inspections and maintenance, failures and corrective action. [06-096 CMR 115, BPT]
- D. Paints, coatings and any solvents associated with the coating process shall be stored properly sealed containers. [06-096 CMR 115, BPT]
- E. Visible emissions from the paint room and exhaust fan shall not exceed 10% on a six-minute block average. [06-096 CMR 101]

- F. WahlcoMetroFlex shall not exceed the emissions of 1,666 pounds of VOC per any calendar month, and therefore will be exempt from the requirements of 06-096 CMR 129, Section 1(C), subpart (1). [06-096 CMR 129]
  - G. WahlcoMetroFlex shall have a total annual VOC emissions limit of 9.9 tons per year based on a twelve-month rolling total and total annual HAP emissions limit of 9.9 tons per year based on a twelve-month rolling total. [06-096 CMR 115, BPT]
  - H. WahlcoMetroFlex shall maintain a record of VOC and HAP emissions and coating material use. The record shall include VOC and HAP emissions calculations based on material usage and VOC and HAP content of the material. The record shall also include dates of coating operations, type of coatings used, volume of coatings used and VOC and HAP content of the coatings based on purchase receipts and MSDS. The record shall be maintained on a monthly as well as a twelve-month rolling total. [06-096 CMR 115, BPT]
- (17) Shot Blast Room
- A. WahlcoMetroFlex shall establish a program of inspection, maintenance and repair for the shot blast room exhaust system that allows for periodic inspection of the exhaust system. WahlcoMetroFlex shall maintain a record of all blast room exhaust system inspections as well as any maintenance and repairs done on the system. [06-096 CMR 115, BPT]
  - B. Fugitive particulate matter emissions from the shot blast operation shall be controlled so as to prevent visible emissions in excess of 20% opacity, except for no more than 5-minutes in any one-hour period. [06-096 CMR 101]
- (18) Gluing Operations
- WahlcoMetroFlex shall maintain a record of glue usage which shall include glue purchase receipts, glue types and MSDS sheets for the glues being used. [06-096 CMR 115, BPT]
- (19) Visible emissions from any general process other than the paint room process source shall not exceed an opacity of 20% on a six-minute block average basis, except for no more than 1 six-minute block average in a 1-hour period.

WahlcoMetroFlex, Inc. )  
Androscoggin County ) Departmental  
Lewiston, Maine ) Findings of Fact and Order  
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After-The-Fact

(20) WahlcoMetroFlex shall keep a copy of this Order on site, and have the operator(s) be familiar with the terms of this Order.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2008.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

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

Date of initial receipt of application: **January 15, 2008**

Date of application acceptance: **January 30, 2008**

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

This Order prepared by, Peter G. Carleton, Bureau of Air Quality