



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI  
GOVERNOR

DAVID P. LITTELL  
COMMISSIONER

**C.B. Boatworks, Inc.** )  
**Oxford County** )  
**Peru, Maine** )  
**A-979-71-B-M (SM)** )

**Departmental**  
**Findings of Fact and Order**  
**Air Emission License**

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

**I. REGISTRATION**

**A. Introduction**

C.B. Boatworks, Inc. of Peru, Maine was issued Air Emissions License, A-979-71-A-N, on November 20, 2007. C.B. Boatworks, Inc. has applied for a minor revision to remove references to Equation 1 of 40 CFR Part 63 Subpart VVVV.

**B. Emission Equipment**

C.B. Boatworks, Inc. is licensed to operate the following air emission activities:

**Process Equipment**

<b>Emission Unit</b>	<b>Chemical Compound used in process</b>	<b>Type of Equip.</b>	<b>Control Device</b>
Gelcoating	Styrene, Methyl Methacrylate (MMA)	Spray guns and closed molding	Fan-forced system through filters
Lamination	Styrene	Spray guns and closed molding	Fan-forced system through filters
Catalyst (gelcoating and lamination)	Organic peroxide initiator	Hand layup	Fan-forced system through filters
Cleanup	Acetone	Job Shop	None
Mold cleaner	Misc VOC chemicals	--	None
Mold release	Misc VOC chemicals	--	None

C.B. Boatworks, Inc. operates a small boiler (0.16 MMBtu/hr) and heaters less than 1.0 MMBtu/hr heat input capacity and are noted for inventory purposes only.

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688 FAX: (207) 287-7826  
RAY BLDG., HOSPITAL ST.

BANGOR  
106 HOGAN ROAD  
BANGOR, MAINE 04401  
(207) 941-4570 FAX: (207) 941-4584

PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769-2094  
(207) 764-0477 FAX: (207) 760-3143

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C. Application Classification

This change will not increase emissions of any pollutant. Therefore, this modification is determined to be a minor revision and has been processed as such.

**II. MINOR REVISION DESCRIPTION**

C.B. Boatworks, Inc., located in Peru, Maine, builds fiberglass boat parts for a small regional boat manufacturer located in Rhode Island. The facility also builds other manufacturing components along with commercial and industrial parts for many diversified applications. Manufacturing operations consists of open and closed molding of fiberglass, primarily hand-lay and spray-up application – with some assembly of component parts. The boat hulls are built using primarily gelcoat, fiberglass and resin along with other raw materials including kevlar, carbon fiber, paint, varnish, wood, foam, etc.

Through Air Emissions License, A-979-71-A-N, the facility was determined to be a synthetic minor, by accepting limits of 10 tons per year (tpy) of any single HAP and 25 tpy total HAP, and therefore is not considered a major source. The air license subsequently states that the facility is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing, 40 CFR Part 63 Subpart VVVV. However, on page 10 of the Finding of Fact section and Specific Condition (21) of the air license, requires CB Boatyards to use Equation 1 of the Boat Manufacturing NESHAP.

The following is taken from page 10 of the Finding of Fact section of CB Boatyards air emissions license:

40 CFR Part 63 Subpart VVVV

*On August 22, 2001 the EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing. The NESHAP requires all major sources of HAPs to meet emission standards that reflect Maximum Achievable Control Technology (MACT). C.B. Boatworks, Inc. has the potential to emit VOC and HAPs above the major source threshold; however, the facility has applied to be synthetic minor with federally enforceable emission limits below these thresholds. Therefore, C.B. Boatworks, Inc. must limit organic HAP emissions from open molding operations to the limit specified by equation 1 of 40 CFR Part 63, Subpart VVVV, based on a 12-month rolling total.*

$$\text{HAP Limit} = [46 (\text{MR}) + 159 (\text{MPG}) + 291 (\text{MCG}) + 54 (\text{MTR}) + 214 (\text{MTG})]$$

*Where:*

*HAP Limit= total allowable organic HAP that can be emitted from the open molding operations, kilograms.*

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*MR= mass of production resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, mega grams.*

*MPG= mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, mega grams.*

*MCG= mass of clear gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, mega grams.*

*MTR= mass of tooling resin used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, mega grams.*

*MTG= mass of tooling gel coat used in the past 12 months, excluding any materials exempt under paragraph (d) of this section, mega grams.*

It was appropriate to include the Maximum Achievable Control Technology (MACT) discussion in the air license, however, the last sentence of the above paragraph, specifying the use of Equation 1, should not have been written - along with the corresponding specific license condition in the Order section.

This minor revision will remove the requirement for C.B. Boatworks, Inc. to use Equation 1 for Hazardous Air Pollutant (HAP) calculations. The facility will use Condition (18) to calculate HAPs and Volatile Organic Compounds (VOC), which uses a mass balance approach.

**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, and
- will not violate applicable ambient air quality standards, or increment standards either alone or in conjunction with emissions from other sources.

Therefore the Department grants this minor revision A-979-71-B-M, subject to the conditions found in air emission license A-979-71-A-N, and in addition to the following conditions:

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(1) The following shall replace Condition (21) of Air Emission License A-979-71-A-N:

(21) C.B. Boatworks, Inc. shall limit the facility's organic HAP emissions to 9.9 tons per year of any single HAP and 24.9 tons per year of combined total HAPs to avoid being considered a major source and subject to the federal boat building MACT, 40 CFR Part 63 Subpart VVVV. The HAP emissions shall be calculated by using the method defined in Condition (18) of Air Emissions License, A-979-71-A-N.

DONE AND DATED IN AUGUSTA, MAINE THIS *26th* DAY OF *June* 2009.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *James P. Brooks for*  
\_\_\_\_\_  
DAVID P. LITTELL, COMMISSIONER

The term of this minor revision shall be concurrent with the term of Air Emission License A-979-71-A-N.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: May 11, 2009

Date of application acceptance: May 11, 2009

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

This order prepared by Edwin Cousins , Bureau of Air Quality

