

SAS Pittsfield, Inc.)	Departmental
Somerset County)	Findings of Fact and Order
Pittsfield, Maine)	Air Emission License
A-443-71-E-A/R)	

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

SAS Pittsfield, Inc. (SAS) of Pittsfield, Maine, has applied to renew their Air Emission License, permitting the operation of emission sources associated with their shoe manufacturing facility. This renewal also clarifies what other process equipment is utilized in the shoe manufacturing process.

B. Emission Equipment

SAS is authorized to operate the following air emissions units:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Stack #</u>
Boiler #1	9.0	60	#5 fuel oil, 2.0%	1
Boiler #2	9.0	60	#5 fuel oil, 2.0%	2

Process Equipment

<u>Equipment</u>	<u>Control Device</u>	<u>Stack</u>
Spray Booth #1	Particulate Filter	1
Spray Booth #2	Particulate Filter	2
Spray Booth #3	Particulate Filter	3
Spray Booth #4	Particulate Filter	4
Spray Booth #5	Particulate Filter	5
Spray Booth #6	Particulate Filter	6
Spray Booth #7	Particulate Filter	7

Spray Booth #8	Particulate Filter	8
Spray Booth #9	Particulate Filter	9
Spray Booth #10	Particulate Filter	9
Spray Booth #11	Particulate Filter	10

C. Application Classification

The application for SAS 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 Chapter 100 of the Air Regulations. 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. Boilers #1 and #2

A summary of the BPT analysis for Boilers #1 and #2 (9.0 MMBtu/hr each), is the following:

Total fuel use for the facility shall not exceed 239,000 gal/year of #5 fuel oil, based on a 12 month rolling total, with a maximum sulfur content of 2.0% by weight.

1. Chapter 106 regulates fuel sulfur content.
2. NO_x, CO and VOC emission limits are based upon AP-42 data dated 10/96 for commercial/institutional boilers.
3. Chapter 103 regulates PM and emission limits.
4. Opacity from Boilers #1 and #2 (Stacks 1 and 2) shall not exceed 30% on a six (6) minute block average, except for no more than 2 six minute block averages in a 3 hour period.

C. Spray Booths

SAS utilizes 11 Spray Booths to paint the final product. The paint is applied via spray guns or manually for slight touch-up jobs. BPT for spray booths is HVLP spray guns. Visible emissions from the stacks serving the Spray Booths (Stack #1 through #10) shall not exceed an opacity of 20% on a 6 minute block average basis, except for no more than 1 six minute block average in a 1 hour period. VOC emissions from the spray booths shall be less than 5 tons per year (based on a 12 month rolling total). Compliance will be based on records showing the quantity of paint used and the percent of VOC by weight in each paint.

D. Adhesive and Top Coat Process

The contact cement used by SAS to attach the soles to the shoe as well as the top-coat process both contain VOCs and HAPs. Facility wide HAP emissions shall be less than 6 tons per year and VOC emissions from these two processes shall be less than 10 tons per year (both based on a 12 month rolling total). Compliance will be based on records showing the quantity of product used and the percent VOC and HAP by weight in each product.

E. Annual Emission Restrictions

SAS shall be restricted to the following, based on a 12 month rolling total:

- 239,000 gallons per year #5 fuel oil, 2.0% sulfur by weight maximum.

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

Pollutant	Tons/Year
PM	3.3
PM ₁₀	3.3
SO ₂	37.5
NO _x	6.7
CO	0.6
VOC	15.1
HAP	6.0

III. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Based on the total facility emissions, SAS Pittsfield, Inc. 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-443-71-E-A/R subject to the following 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.
- (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 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.
- (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.

- (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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (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.
- (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.

(16) **Boilers**

A. Facility wide fuel use shall not exceed 239,000 gallons/year of #5 fuel oil, based on a 12 month rolling total, with a maximum sulfur content of 2.0%. Fuel use records and receipts showing the sulfur content of the fuel shall be maintained on a 12 month rolling total.

B. Emissions from each boiler shall not exceed the following:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>
PM	0.20	1.8
PM ₁₀	n/a	1.8
SO ₂	n/a	18.8
NO _x	n/a	3.6
CO	n/a	0.3
VOC	n/a	0.1

D. Visible emissions from any stack shall not exceed 30% opacity on a six (6) minute block average, except for no more than 2 six minute block averages in a 3 hour period.

(17) **Spray Booths**

Visible emissions from the stacks serving the Spray Booths (Stack #1 through #10) shall not exceed an opacity of 20% on a 6 minute block average basis, except for no more than 1 six minute block average in a 1 hour period.

VOC emissions from the Spray Booths shall not exceed 5 tons per year (based on a 12 month rolling total). Compliance will be based on records showing the quantity of paint used and the percent VOC, by weight, in each paint.

(18) **Adhesive and Top Coat Process**

Facility wide HAP emissions shall be less than 6 tons per year and VOC emissions from the Adhesive and Top Coat processes shall be less than 10 tons per year (both based on a 12 month rolling total). Compliance will be based on records showing the quantity of product used and the percent VOC and HAP, by weight, in each product.

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

(19) **Biennial Emission Statement**

In accordance with MEDEP Chapter 137, the licensee shall report by September 1 every two years (1998, 2000, etc.), to the Department the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions on the Air Toxics emissions inventory portion should be directed to:

Attn: Toxics Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

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

DONE AND DATED IN AUGUSTA, MAINE THIS _____ DAY OF _____ 2001.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: February 27, 2001

Date of application acceptance: March 19, 2001

Date filed with the Board of Environmental Protection: _____

This Order prepared by Mark E. Roberts, Bureau of Air Quality