



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

BETH NAGUSKY
ACTING COMMISSIONER

**Maine Industrial Tire LLC
Cumberland County
Gorham, Maine
A-174-71-Q-R (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., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

1. Maine Industrial Tire LLC (MIT) has applied to renew their Air Emission License permitting the operation of emission sources associated with their tire and polyurethane products manufacturing facility.
2. The equipment addressed in this license is located at 9 Laurence Road, Gorham, ME.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boiler

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (scf/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Stack</u>
Boiler #1A	8.4	8155	Natural gas, negligible	1

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

BANGOR
106 HOGAN ROAD, SUITE 6
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 04679-2094
(207) 764-0477 FAX: (207) 760-3143

Process Equipment

<u>Equipment</u>	<u>Pollution Control Equipment</u>
Wheelabrator #1	Baghouse #1
Wheelabrator #2	Baghouse #2
Sandblaster #1	Baghouse #3
Sandblaster #2	Baghouse #4

General Process Sources

Industrial Tire Assembly Polyurethane Production Parts Washer

C. Application Classification

The application for MIT 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 and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 24, 2005). With the imposed annual VOC and HAP emission limits, the facility is licensed below the major source thresholds and is considered a synthetic minor.

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 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 emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Facility Description

Activities at the MIT site include the company's main office and the following three operations:

1. Industrial Tire Assembly;
2. Polyurethane Production; and
3. Machine Shop

MIT's operations include making solid industrial tires for forklifts and related types of equipment utilizing two processes. The industrial tire assembly process involves remolding rubber mixed by MIT suppliers into solid rubber tires. The polyurethane production process involves blending various constituents and pouring the blend into molds which are then cured to yield a finished product.

C. Boiler #1A

Boiler #1A fires natural gas and is used mainly for facility heating needs. Boiler #1A has a heat input capacity of 8.4 MMBtu per hour, and is therefore not subject to the New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* for steam generating units greater than 10 MMBtu per hour manufactured after June 9, 1989.

A summary of the BPT analysis for Boiler #1A is the following:

1. Boiler #1A shall fire only natural gas.
2. *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 (last amended November 3, 1990) regulates PM emission limits. However, in this case a BPT analysis for PM determined a more stringent limit of 0.05 lb/MMBtu was appropriate and shall be used. The PM₁₀ limits are derived from the PM limits.
3. SO₂, NO_x, CO and VOC emission limits are based upon AP-42 data dated 9/98.
4. Visible emissions from the boiler shall not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period.

D. Process Source Emissions

BPT for particulate matter emissions from the two wheelabrators and the two sandblasters is the use of baghouses, and includes limiting visible emissions to 10% opacity on a six (6) minute block average basis.

VOC emissions result from the industrial tire assembly and polyurethane production processes. Hazardous Air Pollutant (HAP) emissions are primarily emitted from the application of bonding agents and rust inhibitors. Small amounts of HAPS are emitted from the wheelabrator and the hand sandblasting operations.

BPT for VOC and HAP emissions included monthly recordkeeping indicating the amount of chemicals and resins used and the VOC and HAP content of the chemicals and resins. Monthly material use reports are completed from daily production reports and end-of-month inventory inspections. Mass balances for VOCs and HAPs are used for calculations unless actual monitoring has been done, in which case, the monitoring figures will be used. BPT includes monthly records of all rubber used in the tire manufacturing process. HAP and VOC emissions from the rubber used will be calculated using AP-42 emission factors (Section 4.12).

BPT includes an annual (12-month rolling total) VOC emission limit of 39 tons per year and an annual (12-month rolling total) HAP emission limit of 9.9 tons per year of any single HAP and 24.9 tons per year for all combined HAPs.

E. Degreaser Unit

MIT has one 30 gallon parts washer which uses a mineral spirits based solvent. Therefore the parts washer is subject to the requirements of 06-096 CMR 130, Section 1.B (3). Records shall be kept of the solvent added and removed.

F. Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20 percent opacity, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20 percent in any one (1) hour.

G. General Process Emissions

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period.

H. Annual Emissions

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

Total Licensed Annual Emissions for the Facility

Tons per year

(Used to calculate the annual license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	HAP
Boiler #1A	1.8	1.8	0.02	3.57	2.3	0.2	--
Facility Wide Limit	--	--	--	--	--	22.0	9.9 single 24.9 total

Total TPY	1.8	1.8	0.1	3.6	2.3	22.2	9.9 single 24.9 total
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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:

<u>Pollutant</u>	<u>Tons/Year</u>
PM	25
PM ₁₀	25
SO ₂	50
NO _x	100
CO	250

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

MIT previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this renewal.

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-174-71-Q-R subject to the following conditions:

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision 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 (38 M.R.S.A. §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 Chapter 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. [06-096 CMR 115]
- (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:
 - A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:

1. 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
 2. 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 emission testing; and
 - C. 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:
- 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.
[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) **Boiler #1A**

- A. Boiler #1A shall fire only natural gas. MIT shall maintain monthly records of natural gas used. Records shall indicate the 12-month rolling total natural gas use in standard cubic feet.
- B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1A	PM	0.05	06-096 CMR 115, BPT

- C. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1A	0.42	0.42	0.01	0.82	0.69	0.04

- D. Visible emissions from Boiler #1A shall not exceed 10 percent opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [06-096 CMR 101]

(17) **Wheelabrators and Sandblasters**

- A. Particulate matter emissions from the wheelabrators and sandblasters shall be controlled by baghouses. [06-096 CMR 115, BPT]
- B. Visible emissions from each baghouse shall not exceed 10 percent opacity on a six (6) minute block average basis. [06-096 CMR 115, BPT]
- C. MIT shall maintain a log detailing weekly visual inspections for baghouse leaks and all routine and non-routine maintenance on each baghouse. A log shall be kept documenting the location, date and nature of all baghouse failures. [06-096 CMR 115, BPT]

(18) **Parts Washer**

The parts washer at MIT is subject to *Solvent Cleaners*, 06-096 CMR 130 (last amended June 28, 2004).

- A. MIT shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]
- B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 130]:
 - 1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
 - 2. Wipe cleaning; and,
 - 3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
- C. The following standards apply to cold cleaning machines that are applicable sources under Chapter 130.
 - 1. MIT shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
 - (i) Waste solvent shall be collected and stored in closed containers.
 - (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
 - (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
 - (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
 - (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.

- (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
 - (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material shall be immediately stored in covered containers.
 - (viii) Work area fans shall not blow across the opening of the degreaser unit.
 - (ix) The solvent level shall not exceed the fill line.
2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

(19) **VOCs and HAPs**

- A. MIT shall not exceed a facility wide VOCs emission rate of 22.2 tons per year, based on a 12-month rolling total. [06-096 CMR 115, BPT]
- B. MIT shall not exceed a facility-wide HAP emission rate of 9.9 tons per year for any single HAAP and 24.9 tons per year for all HAPs combined, based on a 12-month rolling total. [06-096 CMR 115, BPT]
- C. MIT shall keep records to demonstrate compliance with the VOC and HAP emission limits. Emissions of VOCs and HAPs shall be calculated using AP-42 emission factors. [06-096 CMR 115, BPT]

(20) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20 percent opacity except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20 percent in any one (1) hour. [06-096 CMR 101]

(21) **General Process Sources**

Visible emissions from any general process source shall not exceed 20 percent opacity on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

Maine Industrial Tire LLC
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Departmental
Findings of Fact and Order
Air Emission License

- (22) MIT shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS *22nd* DAY OF *October*, 2010.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Beth Nagusky*
BETH NAGUSKY, ACTING COMMISSIONER

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 6/23/2010

Date of application acceptance: 6/29/2010

Date filed with the Board of Environmental Protection:

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

