STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

Dragon Products Company, LLC
Aroostook County
Frenchville, Maine
A-308-71-J-R

Departmental
Findings of Fact and Order
Air Emission License

After review of the air emission 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., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Dragon Products Company, LLC (Dragon), located in Frenchville, Maine has applied to renew the facility's Air Emission License, permitting the operation of the concrete batch plant, two boilers, and a crushed stone and gravel operation.

B. Emission Equipment

The following equipment is addressed in this renewal:

Concrete Plant

Equipment	Production Rate (cubic yards/hour)	Control Devices
Concrete Batch Plant #1	100	Baghouse
Concrete Batch Plant #2	50	Baghouse
Concrete Batch Plant #3	18	Baghouse

Storage Silos

Equipment	Storage Capacity (cubic yards)	Control Devices
Cement Silo	70	Baghouse
Slag Silo	45	Baghouse

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

web site: www.maine.gov/dep

Rock Crushers - Portable

Designation	Powered	Process Rate (tons/hour)	Control Device
Primary	electrical	70	Spray Nozzles
Secondary	electrical	10	Spray Nozzles

Heating Equipment

Equipment	Maximum Capacity	Fuel Type	Maximum Firing Rate
Boiler #1	1.2 MMBtu/hr	#2 fuel oil (0.5% S)	7.4 gal/hr
Boiler #2	2.5 MMBtu/hr	#2 fuel oil (0.5% S)	18 gal/hr

The facility also has a parts washer on-site.

C. Application Classification

The application for Dragon 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 emissions units only per *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 24, 2005). This renewal does correct an emission limit calculation error.

II. BEST PRACTICAL TREATMENT

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. Concrete Batch Plants

The Frenchville batch plant is Dragon's area concrete distribution point. The cement is trucked to the batch plant from the Thomaston cement manufacturing facility, stored in a split silo, and blended with sand and crushed stone.

To meet the requirements of BPT for control of particulate matter (PM) emissions from the three concrete batch plants and associated storage units (cement silo and slag silo), particulate emissions shall be vented through baghouses maintained for 99% removal efficiency.

Visible emissions from each of the baghouses is limited to no greater than 10% 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. The facility shall take corrective action if visible emissions from the baghouses exceed 5% opacity.

All components of the concrete batch plants shall be maintained so as to prevent PM leaks. Visible emissions from concrete batching operations shall not exceed 20% 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.

C. Rock Crushers

The primary and secondary rock crushers are portable units with rated capacities of 70 tons/hr and 10 tons/hr, respectively. The primary and secondary rock crushers are therefore not subject to EPA New Source Performance Standards (NSPS) Subpart OOO for Nonmetallic Mineral Processing Plants manufactured after August 31, 1983, with capacities greater than 150 tons/hr for portable plants and greater than 25 tons/hr for non-portable plants. The rock crushers are electrically powered.

The regulated pollutant from the rock crushers is particulate emissions. To meet the requirements of Best Practical Treatment (BPT) for control of particulate matter (PM) emissions from the rock crushers, Dragon shall maintain water sprays on the rock crushers and operate as needed to control visible emissions. Visible emissions from the rock crushers shall be limited to no greater than 10% opacity on a six (6) minute block average basis.

D. Boilers #1 and #2

Boiler #1 (1.2 MMBtu/hr) and boiler #2 (2.5 MMBtu/hr) fire #2 fuel oil meeting the requirements of ASTM D396 (maximum fuel sulfur content of 0.5%). Based on the boilers sizes of less than 10 MMBtu/hr each, the boilers are not subject to 40 CFR Part 60, Subpart Dc *Standards of Performance for Small Industrial-*

Commercial-Institutional Steam Generating Units. Total fuel use for the boilers is limited to 50,000 gal/year on a calendar year basis.

A summary of the BPT emission limit findings for the boilers is the following:

PM/PM_{10} – 0.12 lb/MMBtu
SO_2 –based on firing 0.5% sulfur; 0.5036 lb/MMBtu
NOx – 0.3 lb/MMBtu, based on boilers of similar size;
CO – 5 lb/MMBtu, based on AP-42, Table 3.3-1 (dated 10/98);
VOC – 0.34 lb/MMBtu, based on AP-42, Table 3.3-3 (dated 10/98);
Opacity – Visible emissions from each boiler shall not exceed 20% opacity on a 6 minute block average, except for no more than one (1) six (6) minute block average in a 3 hour period.

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1 (1.2 MMBtu/hr)	0.14	0.14	0.60	0.36	0.04	0.01
Boiler #2 (2.5 MMBtu/hr)	0.30	0.30	1.26	0.75	0.09	0.01

E. Stock Piles and Roadways

Visible emissions from a fugitive emission source shall not exceed an opacity of 20%, 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% in any one (1) hour.

F. General Process Emissions

Visible emissions from any other general process (conveyor belts, bucket elevators, bagging operations, etc.) shall not exceed an opacity of 20% 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.

G. Parts Washer

The parts washer has a design capacity of 30 gallons and is subject to *Solvent Cleaners*, 06-096 CMR 130 (last amended June 28, 2004) if the solvent used has a VOC content of greater than 5% by weight.

H. Facility Emissions

Dragon shall be restricted to the following annual emissions, based on a calendar year total (50,000 gal/yr limit):

Total Licensed Annual Emissions for the Facility
(used to calculate the annual license fee)

	PM	PM_{10}	SO_2	NO_x	CO	VOC
Boilers Total	0.4	0.4	1.8	1.1	0.1	0.01

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 of a renewal if the total emissions of any pollutant released do not exceed the following:

Pollutant	TPY
PM	25
PM_{10}	25
SO_2	50
NO_x	100
CO	250

Based on the total facility licensed emissions, Dragon 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-308-71-J-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. [06-096 CMR 115]

(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 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) **Concrete Batch Plants**

A. Particulate emissions from the three concrete batch plants and associated storage units (cement silo and slag silo) shall be vented through the respective baghouses and all components of the batch plants shall be maintained so as to prevent PM leaks. [06-096 CMR 115, BPT]

B. To document maintenance of the concrete batching operation baghouses, the licensee shall keep a maintenance log recording the date and location of all bag failures as well as all routine maintenance. The maintenance log shall be kept on-site at the concrete batch plant location. [06-096 CMR 115, BPT]

C. Opacity from each of the baghouses is limited to no greater than 10% on a 6 minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. Dragon shall take corrective action if visible emissions from the baghouses exceed 5% opacity. [06-096 CMR 101]

D. Fugitive PM emissions from the concrete batching operations shall be controlled so as to prevent visible emissions in excess of 20% 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]

(17) **Rock Crushers**

A. Dragon shall install and maintain spray nozzles for particulate control on the primary and secondary rock crushers and operate the spray nozzles as necessary to limit visible emissions from each rock crusher to no greater than 10% opacity on a six (6) minute block average basis. [06-096 CMR 115 (BPT) and 06-096 CMR 101]

B. Dragon shall maintain a log detailing and quantifying the hours of operation on a daily basis for the primary and secondary rock crushers. The operation log shall be kept on-site at the rock crushing location. [06-096 CMR 115, BPT]

C. Dragon shall maintain a log detailing the maintenance on particulate matter control equipment (including spray nozzles). Dragon shall perform monthly inspections of any water sprays to ensure water is flowing to the correct locations and initiate corrective action within 24 hours if water is found to not be flowing properly. Records of the date of each inspection and any corrective action required will be included in the maintenance log. The maintenance log shall be kept on-site at the rock crushing location. [06-096 CMR 115, BPT]

D. The crushers shall not be attached or clamped via cable, chain, turnbuckle, bolt, or other means (except electrical connections) to any anchor, slab, or structure (including bedrock) that must be removed prior to transportation. [06-096 CMR 115, BPT]

(18) **Boilers #1 and #2**

A. Total fuel use for Boilers #1 and #2 shall not exceed 50,000 gallons per year, based on a calendar year, of #2 fuel oil meeting the requirements of ASTM D396 (maximum sulfur content not to exceed 0.5% by weight). Compliance shall be based on fuel receipts from the supplier showing the quantity and type of fuel delivered. Records of fuel use shall be kept on a monthly and calendar year total. [06-096 CMR 115, BPT]

B. Emissions from Boilers #1 and #2 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 #1 (1.2 MMBtu/hr)	0.14	0.14	0.60	0.36	0.04	0.01
Boiler #2 (2.5 MMBtu/hr)	0.30	0.30	1.26	0.75	0.09	0.01

C. Visible emissions from each of the boilers shall not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block averages in a continuous 3-hour period. [06-096 CMR 101]

(19) **Stockpiles and Roadways**

Visible emissions from a fugitive emission source shall not exceed an opacity of 20%, 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% in any one (1) hour. [06-096 CMR 101]

(20) **General Process Emissions**

Visible emissions from any other general process (conveyor belts, bucket elevators, bagging operations, etc.) shall not exceed an opacity of 20% 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.

(21) **Parts Washer**

Parts washers at Dragon are subject to *Solvent Cleaners*, 06-096 CMR 130 (last amended June 28, 2004).

A. Dragon 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. Dragon 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]

(22) **Equipment Relocation** [06-096 CMR 115, BPT]

A. Dragon shall notify the Bureau of Air Quality, by a written notification at least 48 hours prior to relocation of any equipment carried on this license. Written notice may be sent by mail, facsimile (fax), or e-mail. Notification sent by mail shall be sent to the address below or to a Department Regional Office:

Attn: Relocation Notice
Maine DEP, Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Equipment relocation notification can also be done on-line with e-notice at www.maine.gov/dep/air/compliance/forms/relocation.

The notification shall include the address of the equipment's new location, an identification of the equipment and the license number pertaining to the relocated equipment.

B. Written notification shall also be made to the municipality where the equipment will be relocated, except in the case of an unorganized territory where notification will be made to the respective county commissioners.

(23) Dragon shall keep a copy of this Order on site, and have the operator(s) be familiar with the terms of this Order. [06-096 CMR 115, BPT]

(24) Dragon 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-C].

DONE AND DATED IN AUGUSTA, MAINE THIS 4th DAY OF February , 2010.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brooks for
DAVID P. LITTELL, 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: October 30, 2008
Date of application acceptance: November 5, 2008

Date filed with the Board of Environmental Protection:

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.