



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

Safe Handling, Inc.)
Androscoggin County) Departmental
Auburn, Maine) Findings of Fact and Order
A-702-71-E-T/A) Air Emission License
) Transfer

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

Safe Handling, Inc. (SH) has requested the transfer of Air Emission License A-702-71-D-R from Luzenac America, Inc. to SH. Air Emission License A-702-71-D-R was issued to Luzenac America, Inc. on February 25, 2008.

SH operates several Air Emission Units that were previously unlicensed. SH now requests to add these unlicensed units to the transferred Air Emission License.

B. Emission Equipment

The following is new equipment:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel</u>	<u>Stack #</u>
Track 10 Boiler	1.8	1724 scf/hr	Natural gas	5
IGA Boiler	1.2	8.84 gal/hr	#2 fuel oil	6
G-5 Boiler	2.1	14.74	#2 fuel oil	7
Bagging Building Boiler	1.1	1083 scf/hr	Natural gas	8
Truck Wash Boiler	1.2	1143 scf/hr	Natural gas	9
Texpar Boiler	6.3	45.2 gal/hr	#2 fuel oil	10

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

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Process Equipment

<u>Equipment</u>	<u>Production Rate (tons/hr)</u>	<u>Pollution Control Equipment</u>	<u>Stack #</u>
Dry Chemical Mixing Tank	1.4	Dust Collectors	11, 12
Parts Washer	15 gallons	-	-

C. Application Classification

The modification of a minor source is considered either a minor modification or a major modification based on whether or not expected emission increases exceed the “Significant Emission Levels” as defined in the Department’s regulations. Based upon the expected emissions as identified in the application, this application is determined to be a License Transfer with a minor modification and has been processed as such.

II. Transfer Requirements

A. Title, Right, or Interest

In their application, SH submitted copies of property deeds transferring ownership of the facility to SH. The parties have provided sufficient evidence of title, right, or interest in the facility to allow the transfer of the facility’s licenses.

B. Financial Capacity and Intent

SH states that they possess the financial capacity to operate the facility in compliance with its air emission license.

C. Technical Capacity and Intent

SH acquisition of the facility is not expected to result in any significant change in the employees that currently operate the equipment, facilities, and conduct other activities. The facility’s regulatory history with the MEDEP demonstrates that the environmental personnel are competent in air pollution control. The information submitted in the application provides sufficient evidence that SH has the technical capacity and intent to comply with their air emission license.

D. Full Name and Address

The full name and address of the new owner is:

Safe Handling, Inc.
 123 Rodman Rd.
 Auburn, ME 04210

III. 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 new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 CMR 100 (last amended December 24, 2005). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Natural Gas Units

The Track 10, Bagging Building, and Truck Wash Boilers each fire Natural Gas and have maximum rated capacities of 1.8, 1.1, and 1.2 MMBtu/hr respectively. They are therefore not subject to EPA's New Source Performance Standards 40 CFR 60, Subpart Dc, for boilers with a heat input of 10 MMBtu/hr or greater, and manufactured after June 9, 1989.

A summary of the BACT analysis for the Natural Gas Units follows:

1. *Low Sulfur Fuel*, 06-096 CMR 106 (last amended June 9, 1999) regulates fuel sulfur content. However, the use of natural gas is more stringent and shall be considered BACT.
2. A PM emission limit of 0.05 lb/MMBtu shall be considered BACT. The PM₁₀ limits are derived from the PM limits.
3. SO₂, NO_x, CO and VOC emission limits based upon AP-42 data dated 7/98 for the combustion of natural gas.

4. Visible emissions from the stack of each Natural Gas Unit shall not exceed 10% opacity on a six (6) minute block average, except for no more than one (1), six (6) minute average in a 3-hour period.

C. Oil Fired Units

The IGA, G-5, and Texpar Boilers each fire #2 Fuel Oil and have maximum rated capacities of 1.2, 2.1, and 6.3 MMBtu/hr respectively. They are therefore not subject to EPA's New Source Performance Standards 40 CFR 60, Subpart Dc, for boilers with a heat input of 10 MMBtu/hr or greater, and manufactured after June 9, 1989.

A summary of the BACT analysis for the Oil Fired Units follows:

1. 06-096 CMR 106 regulates fuel sulfur content. However, the use of #2 fuel oil that meets the criteria in ASTM D396 is more stringent and shall be considered BACT.
2. *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 (last amended November 3, 1990) regulates PM emission limits for the Texpar Boiler. However a PM emission limit of 0.08 lb/MMBtu is more stringent and shall be considered BACT. A PM emission limit of 0.08 shall be considered BACT for the IGA and G-5 Boilers. The PM₁₀ limits are derived from the PM limits.
3. NO_x, CO and VOC emission limits based upon AP-42 data dated 9/98.
4. Visible emissions from the stack of each Oil Fired Unit shall not exceed 10% opacity on a six (6) minute block average, except for no more than one (1), six (6) minute average in a 3-hour period.

D. Process Equipment

To meet the requirements of BACT for control of particulate matter (PM), emissions from the Dry Chemical Mixing Tank shall be vented through three dust collectors. Visible emissions from the two dust collector vents shall be limited to 5% opacity on a 6-minute block average basis, except for 5 minutes in any one hour period. All components of the Dry Chemical Mixing Tank shall be maintained to prevent PM leaks. A log documenting all maintenance performed on the Dry Chemical Mixing Tank shall be kept.

E. Degreaser #1

SH operates a solvent degreaser with a capacity of 15 gallons. The degreaser uses Super Agitene 141 brand solvent. Records shall be kept of solvent added or removed.

F. Annual Emission Restrictions

1. SH shall be limited to 250,000 gallons of #2 fuel oil, on a calendar year basis.
2. Natural Gas emissions are based on continuous operation.
3. SH shall not exceed the following emissions on a calendar year basis:

Total Licensed Annual Emissions for the Facility

Tons/year

(used to calculate the annual license fee)

	PM	PM₁₀	SO₂	NO_x	CO	VOC
#2 Fuel Oil	1.4	1.4	8.8	2.5	0.6	0.1
Natural Gas	1.2	1.2	0.1	2.3	1.9	0.1
Total	2.6	2.6	8.9	4.8	2.5	0.2

IV. AMBIENT AIR QUALITY ANALYSIS

According to the 06-096 CMR 115, the level of air quality analyses required for a minor source shall be determined on a case-by case basis. Based on the total facility emissions, SH is below the emissions level required for modeling and monitoring.

ORDER

Based on the above, the Department concludes that the applicant for the air emission license transfer has the capacity to satisfy all applicable statutory criteria and hereby APPROVES the transfer of Air Emission License A-702-71-D-R, from Luzenac America, Inc. to SH. The Department also grants Air Emission License Amendment A-702-71-E-T/A subject to the conditions found in Air Emission License A-702-71-D-R, and 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.

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SPECIFIC CONDITIONS

The following shall replace Specific Condition (16) in Air Emission License A-702-71-D-R:

(16) Process Equipment

- A. Particulate emissions from the talc storage silos #1 and #2 and pneumatic receivers #1 and #2 shall be vented through fabric filters. The fabric filters and all components of the facility shall be maintained so as to prevent excess emissions and PM leaks. [06-096 CMR 115, BPT]
- B. Particulate emissions from the Dry Chemical Mix Tank shall be vented through dust collectors. The dust collectors shall be maintained so as to prevent excess emissions and PM leaks. [06-096 CMR 115, BACT]
- C. The licensee shall keep a maintenance log recording the date and location of all filter failures as well as all routine and non-routine maintenance conducted on the fabric filters and the dust collectors. The maintenance log shall be kept on-site at the facility. [06-096 CMR 115, BPT, BACT]
- D. Visible emissions from each fabric filter and from each of the dust collector vents shall not exceed 5% opacity on a six minute block average basis except for 5 minutes in any one hour period. [06-096 CMR 101, BPT, BACT]

The following shall replace Specific Condition (17) in Air Emission License A-702-71-D-R:

(17) Natural Gas Units

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

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Hot Water Boiler	0.06	0.06	0.01	0.12	0.10	0.01
Track 10 Boiler	0.09	0.09	0.01	0.18	0.15	0.01
Bagging Building Boiler	0.06	0.06	0.01	0.11	0.09	0.01
Truck Wash Boiler	0.06	0.06	0.01	0.12	0.10	0.01

- B. Visible emissions from each Natural Gas Unit 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. [06-096 CMR 101]

The following are new Conditions:

(21) **Oil Fired Units**

A. SH shall not exceed 250,000 gallons of #2 fuel oil (calendar year basis) that meets the criteria in ASTM D396. Records from the supplier documenting quantity and type of fuel received shall be kept for compliance purposes. [06-096 CMR 115, BACT]

B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Texpar Boiler	PM	0.08	06-096 CMR 103(2)(B)(1)(a), BACT

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

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Texpar Boiler	0.50	0.50	3.17	0.90	0.23	0.03
G-5 Boiler	0.17	0.17	1.06	0.30	0.08	0.01
IGA Boiler	0.10	0.10	0.60	0.17	0.04	0.01

D. Visible emissions from each Oil Fired Unit 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. [06-096 CMR 101]

(22) **Degreaser #1**

Degreaser #1 at SH is subject to *Solvent Cleaners*, 06-096 CMR 130 (last amended June 28, 2004).

A. SH 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. SH 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]

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- (23) SH 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) SH 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 10th DAY OF November, 2009.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *David P. Littell*
DAVID P. LITTELL, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-702-71-D-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 8/14/2009

Date of application acceptance: 8/30/2009

Date filed with the Board of Environmental Protection: _____

This Order prepared by Jonathan Voisine, Bureau of Air Quality.

