



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE  
GOVERNOR

PATRICIA W. AHO  
ACTING COMMISSIONER

Washburn & Doughty Associates, Inc. )  
Lincoln County )  
East Boothbay, Maine )  
A-1050-71-A-N (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

Washburn & Doughty Associates, Inc. (W&D) of East Boothbay, Maine has applied for a new Air Emission License, permitting the operation of emission sources associated with their steel and aluminum commercial marine vessels manufacturing site.

B. Emission Equipment

W&D is licensed to operate the following air emission activities:

**Boilers**

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hr)	Fuel Type	Stack #
Boiler #1	2.5	2.2	Propane	1
Boiler #2	2.5	2.2	Propane	2

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  
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312 CANCO ROAD  
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(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**

Emission Unit ID *	Type of Equipment	Maximum Raw Material Process Rate (name and rate)	Date of Installation	Control Device
Sprayer #1	Spray gun (airless)	Surface coating 6 gal/hr **	Sept. 2008	None
Sprayer #2	Spray gun (airless)	Surface coating 6 gal/hr **	Sept. 2008	None
Sprayer #3	Spray gun (airless)	Surface coating 6 gal/hr **	Sept. 2008	None
Sprayer #4	Spray gun HVLP (conventional)	Surface coating 3 gal/hr **	Sept. 2008	None

\* W&D has the flexibility to change sprayers when replacement becomes necessary.

\*\* Spray gun flow rates are estimated based on product specification sheets, maximum application rates and efficiencies, and time to change out paint cans.

W&D operates other small fuel burning equipment (heaters) less than 1.0 MMBtu/hr and a stationary internal combustion engine less than 0.5 MMBtu/hr which are considered exempt from licensing and considered insignificant activities as defined in 06-096 CMR 115 (as amended) Appendix B. The emergency diesel generator is considered an insignificant activity due to its size but it is applicable to 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, thus requires inclusion in this license. There is also some processes (i.e. welding, sanding, shotblasting) which are controlled and vented in the building and therefore are considered categorically insignificant per 06-096 CMR 115 (as amended). These units are noted for inventory purposes only and are described in greater detail in Attachment C of W&D air license application submitted March 2011.

C. Application Classification

A new source is considered a major source based on whether or not expected emissions exceed the "Significant Emission Levels" as defined in the Department's regulations. The emissions for the new source are determined by the maximum future license allowed emissions, as follows:

Pollutant	Max. Future License (TPY)	Sig. Level
PM	2.7	100
PM <sub>10</sub>	2.7	100
SO <sub>2</sub>	0.2	100
NO <sub>x</sub>	4.5	100
CO	0.8	100
VOC	24.9	50
Single HAP	9.9	10
Total HAP	24.9	25

The Department has determined the W&D facility is a minor source and the application has been processed through Minor Source Air Emission License Regulations, 06-096 CMR 115 (as amended). EPA Region I conducted an inspection in 2010, after the inspection it was found that the facility could emit greater than 10 pounds per hour or 100 pounds per day of a criteria air pollutant (VOC), therefore the facility applied for and is granted this minor source air license. With the VOC and HAP limits on the process equipment at the facility, W&D is licensed below the major source thresholds and below 06-096 CMR 137 (as amended) reporting thresholds. Therefore, the facility is considered a synthetic minor.

## II. BEST PRACTICAL TREATMENT (BPT)

### A. Introduction

#### General

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 (as amended). 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 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

Process Description

W&D constructs steel and aluminum commercial marine vessels. The company began in 1977 by serving the fishing industry. They have since diversified their products to include tugboats, commercial passenger vessels, ferries, and research boats. A July 11, 2008 fire completely destroyed their facility. The facility was inoperable for 2 months until temporary accommodations could be installed to continue shipbuilding, while reconstructing the entire manufacturing facility. Shipbuilding began, in parallel with reconstruction of the building in September 2008. One year later, the company had rebuilt their new 42,000 square foot facility and added several new employees. The new building features two construction bays each with cranes; additional shop space; and, offices for production, management, engineering, and design.

The processes at the company's shipbuilding operations include:

- propane fired furnaces for building heating,
- emergency power generation during power outages,
- welding,
- surface coating,
- forklift and truck operating,
- painting, and
- grit and sponge-jet blasting.

**B. BACT Determination**

Boilers and Heaters

The boilers and heaters at W&D are each rated under 10 MMBtu/hr and are 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 units greater than 10 MMBtu/hr manufactured after June 9, 1989. Since the boilers fire propane, the boilers are not subject to National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR Part 63 Subpart JJJJJ).

A summary of the BACT analysis for Boiler #1 and #2 (each rated at 2.5 MMBtu/hr) is the following:

1. Annual emissions from the facility are based on the maximum amount of propane fired in the boilers (473,000 gallons/year of propane) that can be combusted 24 hours per day 7 days per week

2. Fuel Burning Equipment Particulate Emission Standard, 06-096 CMR 103 (as amended) regulates PM emission limits. The PM<sub>10</sub> limits are derived from the PM limits.
3. NO<sub>x</sub> emission limits are based on data from similar propane fired boilers of this size and age.
4. CO and VOC emission limits are based upon AP-42 data dated 9/98.
5. 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 average in a continuous 3-hour period.

#### Emergency Diesel Generator

06-096 CMR 115 (as amended), Appendix B states a unit or activity may be considered insignificant, but the unit is not since it is subject to an applicable requirement. The diesel unit is applicable to 40 CFR Part 63, Subpart ZZZZ. Pursuant to 63.6603(a), the unit is subject to Tables 2b and 2d of Subpart ZZZZ, including changing the oil and filter every 500 hours of operation or annually (whichever comes first); inspecting all hoses and belts every 500 hours of operation or annually (whichever comes first) and replacing as necessary; and inspecting the air cleaner every 1000 hours of operation or annually (whichever comes first). Compliance with the standard is required by May 3, 2013.

#### Welding and Grit Blasting

Typical assembly and maintenance activities include welding, grit and sponge-jet blasting, grinding, sanding, and buffing. These activities are identified as categorically exempt or insignificant according to 06-096 CMR 115 (as amended) Appendix B and it should be noted that these activities occur indoors. Specifically, welding occurs indoors with particulates collected at the point of generation, which are routed to a particulate filter (Donaldson Torit Downflo Oval model DFO-4-16) and exhausted indoors.

#### Surface Coating

Surface coating is applied to commercial marine vessels under construction at the facility. The facility uses the unit building concept, where modular components are constructed and then installed. Typically, very little surface coating occurs during the first 4 to 6 months of construction. During this initial period, the only surface coating conducted occurs in small areas that will subsequently be closed off or inaccessible (e.g. wire ways and pipe runs). Most of the surface coating occurs during the latter six months of construction. The majority of the painting is conducted in interior areas of the building.

A review of the USEPA RACT/BACT/LAER clearinghouse for shipbuilding and miscellaneous and Metal Parts Surface Coating revealed the following potential BACT technologies in use:

- Low VOC paints,
- Spray paint booths,
- Use of High Volume Low Pressure sprayers, and
- Closed containers.

Of these Best Available Control Technologies, W&D uses low VOC paints and closed containers. The remaining two potential technologies are not technologically feasible for this industry and the reasons are discussed below. The Department also requested W&D to address the potential use of powdered coatings; therefore a discussion for this technique is also included herein.

- Spray Paint Booths: Painting is conducted on the vessels after construction of areas is substantially complete. Because the vessels range in size from 70 to 200 feet, it would not be feasible to paint within a spray paint booth. The vessels are stationary (due to size and weight) until they are launched. It would not be feasible to paint smaller portions of the vessel prior to installation into the main craft because of the damage that would be incurred to the paint surface upon installation (so much damage would occur, that re-painting would be necessary). For these reasons, surface coating in a spray paint booth is not technologically feasible.
- HVLP Sprayers: The facility has four spray guns available for use as identified in the application: three are airless sprayers and one is a stand-by HVLP conventional sprayer. Airless sprayers are required to be used for most paint applications because of the high solids content of the paints and the paint thickness specifications required for marine use. Paint transfer efficiencies are higher with airless sprayers, minimizing particulate matter (PM) and subsequently VOC emissions than would be achieved using HVLP which are promoted by EPA in other industries that surface coat other media. Use of HVLP sprayers for this application would require thinning the paint (increasing the VOC emissions) and would require application of an additional 2 to 3 coats to achieve the paint thickness that is specified for the marine vessels. On the occasions when the HVLP conventional sprayer has been in service at the facility, it has exhibited more overspray than the airless sprayers.
- Powder coatings: Some surface coating operations in the State use powder coatings instead of liquid paints. These operations consist of application of a

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free-flowing dry powder, typically a thermoplastic or thermoset polymer, via electrostatic sprayers. Powder coating operations require heat curing at 350-400°F for approximately 10 minutes. For reasons similar to those identified for the spray paint booth, heat curing the installed components of large crafts is not technologically feasible.

Summary

The following control technologies are BACT at this type of facility:

- purchasing materials with low VOC and HAP contents, and
- keeping containers closed when not in use

W&D shall limit VOC emissions to less than 24.9 tons per year and shall limit each individual HAP to less than 9.9 tons per year and 24.9 tons per year total HAP. As part of BACT for VOC and HAPs control, W&D shall maintain, and make available upon request, a current list of all paints, coatings, and cleaning materials in use. This list shall provide the necessary data to determine compliance, including:

- a) Paints, coatings, and cleaning materials in use.
- b) Percent VOC by weight for each and/or the pounds VOC per gallon of materials.
- c) The amount and type of paints and coatings purchased on a monthly basis
- d) The amount and type of cleaning materials purchased on a monthly basis

The monthly totals of VOCs and HAPS shall be calculated and tracked on a 12 month rolling total basis. W&D shall maintain these records for 6 years and make them available upon request from the DEP. In addition to VOC and HAP control, W&D will reduce particulate matter (PM) from various boatyard activities. The facility will control PM emissions from any welding process to route through a particulate filter and subsequently vent indoors. W&D will reduce the potential for fugitive PM emissions from any process conducted outside by limiting such activity to periods of calm winds or through the use of a shroud or wind curtain.

**C. Facility-Wide and Annual Emission Restrictions**

W&D shall be restricted to the following annual emissions, based on a 12 month rolling total:

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

Pollutant	Tons/yr
PM	2.7
PM <sub>10</sub>	2.7
NO <sub>x</sub>	0.2
SO <sub>2</sub>	4.5
CO	0.8
VOC	24.9
Single HAP	9.9
Total HAPS	24.9

40 CFR Part 63 Subpart II

EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) Shipbuilding and Ship Repair (Surface Coating) Operations. The NESHAP requires all major sources of HAPs to meet emission standards that reflect Maximum Achievable Control Technology (MACT). W&D 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.

06-096 CMR 159

W&D reviewed compliance with the new regulation, 06-096 CMR 159 "Control of Volatile Organic Compounds from Adhesives and Sealants". This regulation limits emissions of volatile organic compounds (VOCs) from adhesives, sealants and primers through two basic components: sale and manufacture restrictions that limit the VOC content of specified adhesives, sealants and primers sold in the state; and use restrictions that apply primarily to commercial/industrial applications. All adhesives and sealants in use at W&D are either compliant with the new rule or are exempt from the rule.

**III. AMBIENT AIR QUALITY ANALYSIS**

According to 06-096 CMR 115, the level of air quality analyses required for a minor new source shall be determined on a case-by case basis. Based on the information available in the file, and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source.

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**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-1050-71-A-N 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 06-096 CMR 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]

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- (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 #1 and #2**

- A. Boilers #1 and #2 shall fire only propane fuel; compliance shall be demonstrated by fuel records from the supplier showing the quantity and type of fuel delivered. [06-096 CMR 115, BACT]
- B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.12	06-096 CMR 103(2)(B)(1)(a)
Boiler #2	PM	0.12	06-096 CMR 103(2)(B)(1)(a)

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

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.3	0.3	0.1	0.5	0.1	0.1
Boiler #2	0.3	0.3	0.1	0.5	0.1	0.1

- D. Visible emissions from each boiler 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]

(17) **Emergency Diesel Generator**

A. To meet the insignificant activity requirement, W&D shall keep fuel purchase records documenting that the fuel oil sulfur content is below 0.05% for the emergency diesel fire generator.

[06-096 CMR 140, Appendix B]

B. The emergency diesel fire generator shall comply with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, including the following:

1. change the oil and filter every 500 hours of operation or annually, whichever comes first;
2. inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; and
3. inspect the air cleaner every 1000 hours of operation or annually, whichever comes first.
4. The hours of operation shall be tracked by using an hour meter on the generator or by documenting operations in a log book (recording date, time, and duration).

[40 CFR Part 63, Subpart ZZZZ, including §63.6603(a)]

(18) **Process Emissions**

A. W&D shall maintain good housekeeping practices (close lids, proper storage of open container, etc.) and control emissions from the entire existing and future processes to less than: 24.9 tons/year of VOC emissions, 9.9 tons/year of a single HAP and 24.9 tons/year of total HAPs.

B. W&D shall calculate these emissions on a 12-month rolling total basis, based on the method as specified in Condition (19), (20), and (21).

[06-096 CMR 115, BACT]

(19) To ensure compliance with BACT for VOC and HAPS, W&D shall record the quantity of coatings, paints, adhesives, and solvents used at the facility and also the VOC and HAP content of each, and any other applicable information for each of the following:

- Monthly Facility Purchases for use at the facility
- Quantity shipped off Site

[06-096 CMR 115, BACT]

(20) The mass balance equation shall be defined as follows to determine monthly VOC emissions for the applicable boat manufacturing (utilizing the data collected from Condition (19) and any other applicable data):

- A. Monthly Facility Purchases
- B. Quantity Shipped offsite

$$\text{Monthly VOC Emissions} = (A \times \text{VOC content}) - (B \times \text{VOC content})$$

[06-096 CMR 115, BACT]

(21) To ensure compliance with BACT for VOC control, W&D shall continue to research pollution prevention technologies such as low VOC & HAP content chemicals and spray painting techniques/applications. [06-096 CMR 115, BACT]

(22) W&D shall properly maintain all dust collection equipment in the facility and make repairs as necessary to prevent system leakage.  
[06-096 CMR 115, BACT]

(23) Particulate matter emissions from exhaust fan filters are generally unquantified; therefore particulate matter emissions shall be limited to 10% opacity based on a 6 minute block average basis. [06-096 CMR 115, BACT]

(24) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) 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]

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(25) General Process Sources

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. [06-096 CMR 101]

DONE AND DATED IN AUGUSTA, MAINE THIS 20<sup>th</sup> DAY OF June, 2011.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie L. [Signature]  
PATRICIA W. AHO, 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: March 1, 2011

Date of application acceptance: March 15, 2011

Date filed with the Board of Environmental Protection:

This Order prepared by Edwin Cousins, Bureau of Air Quality.



