

Etheridge Foundry and Machine Co.)	DEPARTMENTAL
Cumberland County)	FINDINGS OF FACT AND ORDER
Portland, Maine)	AIR EMISSION LICENSE
A-106-71-G-M)	Amendment #1

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:

Etheridge Foundry and Machine Co. (EFM) of Portland, Maine was issued Air Emission License A-106-71-F-R on April 29, 2003, permitting the operation of emission sources associated with their iron foundry and machining facility.

EFM has applied to amend their Air Emission License in order to remove the requirement that states: "At any time an electric induction furnace is in operation, it shall be vented to a rotoclone for the control of fugitive particulate emissions". EFM requests that due to the difficulty and long lead time in obtaining replacement parts, an opacity standard be implemented in the place of the rotoclone requirement. An on-site inspection conducted by representatives of the MEDEP Bureau of Air Quality verified that EFM can operate their furnaces under a 10% opacity standard while the rotoclone is not in operation.

B. Application Classification:

This amendment will increase emissions by less than 4 ton/year for each single pollutant and less than 8 ton/year for all pollutants combined. Therefore, this modification is determined to be a minor revision and has been processed as such.

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. Electric Induction Furnaces:

EFM uses the 2 electric induction furnaces to melt iron for castings. Only clean material may be used safely in each electric induction furnace. Since there is only one electrical power supply for the two electric induction furnaces, only one electric induction furnace shall be operated at a time.

BPT for the electric induction furnaces shall be the operation of only one electric induction furnace at a time. The vents from the electric induction furnaces shall each not exceed an opacity on 10% on a six minute block average.

III. AMBIENT AIR QUALITY ANALYSIS

According to 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 potential facility emissions, EFM 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-106-71-G-M, subject to the conditions found in Air Emission License A-106-71-F-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.

SPECIFIC CONDITIONS

The following shall replace Condition 17 in Air Emission License A-106-71-F-R.

- (17) Electric Induction Furnaces [06-096 CMR 115, 06-096 CMR 101, BPT]
- A. Only one electric induction furnace shall operate at a time.
 - B. The vents from the electric induction furnaces shall each not exceed 10% opacity on a six minute block average.

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The following is a new Condition:

- (1) EFM 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 (Title 38 MRSA §605).

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2007.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-106-71-F-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/31/2006

Date of application acceptance: 11/27/2006

Date filed with the Board of Environmental Protection: _____

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