

Spinnaker Coating – Maine, Inc.)
Cumberland County)
Westbrook, Maine)
A-726-70-A-I)

**Departmental
Findings of Fact and Order
Part 70 Air Emission License**

After review of the Initial Part 70 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

| | |
|--------------------------|---|
| FACILITY | Spinnaker Coating - Maine, Inc. (Spinnaker) |
| LICENSE NUMBER | A-726-70-A-I |
| LICENSE TYPE | Initial Part 70 License |
| SIC CODES | 2671 |
| NATURE OF BUSINESS | Coating and Laminating Paper |
| FACILITY LOCATION | Westbrook, ME |
| DATE OF LICENSE ISSUANCE | April 21, 2000 |
| LICENSE EXPIRATION DATE | April 21, 2005 |

B. Emission Equipment

The following source is addressed by this Part 70 License:

| EMISSION UNIT ID | UNIT CAPACITY | UNIT TYPE | CONTROL EQUIPMENT |
|-----------------------------|--------------------------|-------------------|------------------------------|
| #76 Solvent Coater | 135 tons/day | process equipment | carbon adsorber |

C. Application Classification

The application for Spinnaker does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 for a Part 70 source.

II. EMISSION UNIT DESCRIPTION

A. Emission Unit #1 (process equipment)

Spinnaker was issued air emission license A-726-71-A-T/N on February 26, 1998. The air emission license approved a transfer of S.D. Warren Company's pressure sensitive paper business to Spinnaker Coating. As part of the transaction, Spinnaker has agreed to accept, Coater #76, its ancillary components and associated control technology, and the air pollution control licenses authorizing its operation. Spinnaker and S.D. Warren are unrelated entities with no common ownership or management. This Title V license will not alter this arrangement; they remain unrelated.

Solvent Based Paper Coater

Spinnaker's major air emission source is the solvent based paper coater referred to as #76 Coater along with its supporting equipment including tanks, piping, and solvent degreasers. This coater is a major source of VOC with a maximum solvent use of 5914 tons per year. Due to the extremely high potential VOC emissions from this source, Spinnaker is required to control VOC emissions from the #76 coater by a dual bed carbon bed adsorber recovery system.

The coater is controlled such that it cannot operate unless the solvent recovery system is operating. In addition, the solvent coating and recovery system is automatically shut down if the levels in the recovered solvent tanks becomes too high. The Department found BPT for the solvent coater is the operation of the carbon bed adsorbers at an average solvent recovery efficiency of 90 percent, on a 12 month rolling average, based on capture and removal.

Solvent Degreasers

Spinnaker also has some solvent degreasers which will meet all applicable requirements of Chapter 130 of the Department's regulations. BPT for fugitive VOC emission sources shall include keeping all containers covered when not in immediate use, and managing materials in such a manner as to reduce the likelihood of spills.

Storage Tanks

Spinnaker has three main solvent storage tanks with a maximum capacity of 15,000 gallons each. BPT shall include maintaining these tanks and associated piping free of liquid and vapor leaks. BPT shall also include a vapor recovery system to recover the vapors displaced from the storage tanks during solvent delivery. These tanks shall meet the applicable sections of 40 CFR Part 60 Subpart Kb.

B. Periodic Monitoring

The following are continuously monitored and recorded for the solvent recovery unit:

1. Bed Temperature (upper and lower)
2. Decanter and Cooling Water Temperatures
3. Steam Flow
4. Fan Discharge Pressure

Spinnaker will use the approved % solvent recovery efficiency method as shown below:

Solvent Used (lbs)

Hexane = (Final meter reading - initial meter reading) x 5.5 lbs/gallon

Toluene = (Final meter reading - initial meter reading) x 7.2 lbs/gallon

Recycled Solvent = (Final meter reading - initial meter reading) x 6.45 lbs/gallon

Total Used = Hexane + Toluene + Recycled Solvent - Change in inventory in coating mix (See Note #1)

Solvent Recovered (lbs)

Recycled Solvent Used = (Final meter reading - initial meter reading) x 6.45 lbs/gal

Change in Recovered Solvent Tank Inventory (See Note #2) = (Final Inventory - initial inventory) x 6.45 lb/gallon

Total recovered = Recycled Solvent Used + Change in Recovered Solvent Tank Inventory + Solvents in Hazardous Waste Generated (See Note #3)

Solvent Recovery Efficiency

$$\% \text{ Recovery} = \frac{\text{Solvent Recovered}}{\text{Solvent Used}} \times 100$$

All meter readings and inventories will be taken on the final day of each calendar month.

NOTES

Note #1: The change in solvent inventory for the coating mix tanks is calculated as follows:

Change (#) = Change in number of mix tanks full of coating (0-5) x 3,225 lbs of solvent/mix tank + (Change in level of adhesive supply tank (0-100%) x 8,063 lbs solvent

Note #2: The inventory in the recovered solvent tanks for this coater is measured in inches using a calibrated stick. The readings from the stick are converted to gallons.

Note #3: The amount of solvents in hazardous waste generated is calculated as follows: lbs of solvent = lbs of solvent from the waste adhesive coating + lbs of solvent from used rags.

C. Federal and State Applicable Requirements

| Applicable Federal Requirements | Applicable State-only Requirements | Basis for Certifying Compliance/ BPT | Comments |
|--|--|---|--|
| <p>Chapter 123 (3) (B)</p> <ul style="list-style-type: none"> - 4.8 lbs VOC/gallon of solids applied to the substrate on a continuous basis (5) (A) - Submit initial information regarding coating lines and coatings to DEP by Nov 30, 1989 and submit revised information as necessary (5)(B) - Submit revised information to DEP whenever Spinnaker purchases a new coating, diluent, or solvent. (5)(C) - Maintain records regarding diluents, solvents and coatings, including cleanup materials used on daily basis. (6)(B)(4) - Continuously monitor and record pressure drop across absorber and VOC breakthrough concentration. | <p>License</p> <ul style="list-style-type: none"> - Limit of 5,914 tons of solvents used per year. - Limit of 590 tons of VOC emitted from this coater during any 12-month period. - Average solvent recovery efficiency of 85% for recovery system on a monthly basis, and 90% on a 12-month rolling basis - Record all operating parameters of control system once per day. - Calculate monthly control efficiency, monthly total VOC emissions, and monthly VOC emissions from solvent based coatings. Submit results to DEP on a semi-annual basis. - Utilize the DEP-approved % solvent recovery efficiency compliance determination procedure as shown in Section II (B). | <ul style="list-style-type: none"> - VOC/gallon: calculation based on material inputs - Efficiency: mass balance <p>BPT</p> <ul style="list-style-type: none"> - Unit has dedicated activated carbon solvent recovery unit installed in 1976 and this technology would be considered BACT for new solvent based coaters constructed today. - DEP determined controls meet BPT and VOC RACT | <p>No new coatings, diluents, or solvents since Nov 1989</p> <p>Permit shield from Chapter 126 testing requirements based on use of carbon adsorber with calculated efficiency.</p> <p>Permit shield from Chapter 134 based on applicability of Chapter 123.</p> |

III. AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 140, an existing Part 70 source shall be exempt from an impact analysis with respect to a regulated pollutant whose allowable emissions do not exceed the following:

| Pollutant | TPY |
|------------------|-----|
| PM | 25 |
| PM ₁₀ | 25 |
| SO ₂ | 50 |
| NO _x | 100 |
| CO | 250 |

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Based on facility license allowed emissions, Spinnaker is below the emissions level required for modeling and monitoring. Spinnaker does not emit any pollutants that need to be modeled at this time.

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 the Part 70 License A-726-70-A-I, subject to the following conditions:

For each standard and special condition which is State Enforceable only, State-only Enforceability is designated with the following statement: **[Enforceable by State-only]**

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 emission 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 and this license;
- (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 140;
- (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;
- (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; **Enforceable by State-only**
- (5) The licensee shall pay the annual air emissions license fee to the Department, calculated pursuant to Title 38 MRSA §353;
 - (6) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;
 - (7) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; **Enforceable by State-only**
 - (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 or in accordance with other provisions of this license;
 - (9) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, 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 the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.
 - (10) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.
 - (11) 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;
 - (12) 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 under circumstances representative of the facility’s normal process and operating conditions:
 - (i) 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;

- (ii) to demonstrate compliance with the applicable emission standards; or
 - (iii) 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 emissions testing; and
- (c) submit a written report to the Department within thirty (30) days from the date of test completion.

Enforceable by State-only

- (13) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates 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 a interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

- (14) Notwithstanding any other provision 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.

- (15) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
- (a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - (b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to section 114 of the CAA.

- (16) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license.
- (17) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself 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 working day, whichever is later, of such occasions and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;
- (18) Upon the written request of 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 manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

- (19) The licensee shall submit quarterly reports of any required monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.
- (20) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequent if specified in the Applicable requirement by the Department. The compliance certification shall include the following:
- (a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (e) Such other facts as the Department may require to determine the compliance status of the source;
- (21) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- (a) Additional Applicable requirements under the CAA become applicable to the Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;
 - (b) Additional requirements (including excess emissions requirements) become applicable to the Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
 - (c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms of conditions of the Part 70 license; or
 - (d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether

cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

- (22) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license.

SPECIAL CONDITIONS

- (23) Permit Shield for Non-Applicable Requirements
 The following requirements have been specifically identified as not applicable based upon information submitted by the licensee.

| SOURCE | CITATION | DESCRIPTION | BASIS FOR DETERMINATION |
|----------|----------------------------|---|--|
| Boilers | 40 CFR Part 60 Subpart Dc | Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units | Spinnaker does not operate applicable fuel burning equipment, all heating and steam is bought from S.D. Warren Paper Company. |
| Facility | 40 CFR Part 63, Subpart RR | Standards of Performance for Pressure Sensitive Tape and Label Surface Coating. | Spinnaker’s coater was installed in 1976. This subpart is applicable to surface coating equipment constructed after December 1980. |
| Facility | Chapter 129 | Surface Coating Facilities | Spinnaker does not surface coat cans, fabric, vinyl, metal furniture, or misc. metal parts. |

- (23) Spinnaker is subject to the following Department Regulations Chapters:

| CITATION | REQUIREMENT SUMMARY |
|-------------|---|
| Chapter 101 | Visible Emissions Regulation |
| Chapter 109 | Emergency Episode Regulation |
| Chapter 114 | Classification of Air Quality Control Regions |
| Chapter 116 | Prohibited Dispersion Techniques |
| Chapter 123 | Paper Coating Regulation |
| Chapter 126 | Capture efficiency Test Procedures |
| Chapter 134 | VOC RACT |
| Chapter 137 | Emission Statements |
| Chapter 140 | Part 70 Air Emission License Regulations |

- (24) Spinnaker shall meet the applicable sections of EPA’s 40 CFR Part 60 Subpart Kb “Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction or Modification Commenced after July 23, 1984. The applicable sections for VOC storage vessels greater than 40 m³ and less than 75 m³ pertain to proper recordkeeping of tank throughput and tank capacity.

- (25) Spinnaker shall install and maintain a vapor recovery system when filling the main solvent tanks from the tank trucks. The vapor recovery system shall be installed within six months after the issuance date of this air emission license. The facility shall perform routine leak inspections, on a monthly basis, of all tanks and associated piping, including valves, flanges, and pumps, to detect liquid and vapor leaks and take prompt corrective action. Spinnaker shall notify the Department if repairs can not be completed within 5 days.
- (26) Spinnaker is subject to the following operational/maintenance standards for #76 coater and its auxiliary pollution control equipment (carbon bed adsorber):
- a) Averaged over any calendar month, the solvent recovery efficiency must be at least 85%.
 - b) The #76 coater shall maintain an annual, 12 month rolling average, solvent recovery efficiency limit of at least 90%.
 - c) Spinnaker will use the approved % solvent recovery efficiency compliance determination procedure as outlined in the finding of fact section of this Title V license.
 - d) Spinnaker shall not emit more than 590 tons of VOC from the #76 coater during any 12 month period. Spinnaker shall submit semi-annual reports to the Department listing the monthly control efficiencies, monthly total VOC emissions, and monthly VOC emissions from solvent based coatings.
- (27) Spinnaker shall maintain the following, which are continuously monitored and recorded for the solvent recovery unit:
1. Bed Temperature (upper and lower)
 2. Decanter and Cooling Water Temperatures
 3. Steam Flow
 4. Fan Discharge Pressure

Spinnaker shall record all operation periodic monitors on the solvent control system monitoring log sheet once per day to ensure that proper operation of the equipment continues. All logs and records required by this section shall be kept by Spinnaker for at least six years and shall be made available to the DEP upon request.

- (28) Spinnaker shall meet the applicable requirements of Chapter 123 of the Department's regulations. Specifically, after taking into account VOC control equipment, emissions shall meet a limit of 4.8 pounds of VOC emitted per gallon of solids applied to the substrate on a continuous basis. In addition, Spinnaker shall meet Section 5 (C) of Chapter 123 which states "the source shall keep the following records on site for each coating line on a daily basis":

1. Coating line number
2. Time period
3. Coating identification number
4. Amount of coating used
5. Diluent identification number
6. Amount of diluent used

(29) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The initial semiannual report is due October 30, 2000, 30 days from the end of the second calendar quarter following the date of signature of this license.

- A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.
[MEDEP Chapter 140]

(30) **Annual Compliance Certification**

The licensee shall submit an annual compliance certification to the Department in accordance with Condition (20) of this license. The initial annual compliance certification is due April 30, 2001, 30 days from the end of the fourth calendar quarter. The annual compliance certification shall be submitted with the second semiannual report after the signature date of this license.
[MEDEP Chapter 140]

(31) **Annual Emission Statement**

The licensee shall annually report to the Department, in a specified format, fuel use, operating rates, use of materials and other information necessary to accurately update the State's emission inventory. [MEDEP Chapter 137]

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

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2000.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application April 15, 1998

Date of application acceptance August 18, 1998

Date filed with Board of Environmental Protection _____

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