



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

DEPARTMENT ORDER

**Intermat
York County
Biddeford, Maine
A-302-71-P-M**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

FINDINGS OF FACT

After review of the air emission license amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Intermat was issued Air Emission License A-302-71-O-R/A on February 23, 2024, for the operation of emission sources associated with their carbon graphite and carbon materials production facility.

The equipment addressed in this license is located at 389 Hill Street, Biddeford, Maine.

Intermat has requested a minor revision to their license in order to replace the existing Carbonizer Incinerator with a new, like-kind unit.

B. Emission Equipment

The following equipment is addressed in this air emission license amendment:

Fuel Burning Equipment

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (scf/hr)	Fuel Type	Date of Manuf.	Date of Install.
<i>Carbonizer Incinerator*</i>	<i>0.80</i>	<i>775</i>	<i>natural gas</i>	<i>Pre-1990</i>	<i>Pre-1990</i>
Carbonizer Incinerator	0.80	775	natural gas	2024	2024

*Intermat proposes to replace the existing Carbonizer Incinerator with a new unit of the same size.

C. Revision Description

The current Carbonizer Incinerator controls emission from the Atmospheric Carbonizers. It was originally installed when the facility was constructed and is at the end of its useful life. The proposed replacement Carbonizer Incinerator is rated for the same maximum heat input (0.8 MMBtu/hr) firing natural gas. It will achieve the same 99.99% control efficiency, meet the same emission limits, and be operated identically to the current unit with a one-second residence time and 1,600 °F nominal operating temperature. Therefore, the Department finds the new Carbonizer Incinerator will achieve Best Practical Treatment (BPT) for emissions from the Atmospheric Carbonizers as recently established in Air Emission License A-302-71-O-R/A (issued 2/23/2024).

D. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the date this license was issued.

Pursuant to § 2(R) of *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115, replacement of an existing air pollution control system may be considered a minor revision provided the new equipment achieves BPT. As discussed previously, the new Carbonizer Incinerator will achieve BPT. Therefore, this application has been processed as a minor revision in accordance with 06-096 C.M.R. ch. 115.

E. Facility Classification

The facility is licensed as follows:

- As a natural minor source of criteria pollutants, because no license restrictions are necessary to keep facility emissions below major source thresholds for criteria pollutants; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

F. Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility's annual air license fee and establishing the facility's potential to emit (PTE). Only licensed equipment is included, i.e., emissions from insignificant activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included except when required by state or federal regulations. Maximum potential emissions were calculated based on the following assumptions:

- Operating Boiler #1, the Carbonizer Incinerator, the Graph Incinerator, and the Pitch Impregnator for 8,760 hours/year; and

- Operation of the Aluminum Plasma Spray process for 10 hours/year.

This information does not represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

Total Licensed Annual Emissions for the Facility

Tons/year

(used to calculate the annual license fee)

	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	CO	VOC
Boiler #1	0.3	0.3	0.3	–	0.6	0.5	0.1
Carbonizer Incinerator	0.2	0.2	0.2	–	0.7	0.3	–
Graph Incinerator	0.1	0.1	0.1	–	0.6	0.2	–
Pitch Impregnator	–	–	–	4.0	0.8	0.1	0.1
Total TPY	0.6	0.6	0.6	4.0	2.7	1.1	0.2

Pollutant	Tons/year
Single HAP	7.9
Total HAP	19.9

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, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License Amendment A-302-71-P-M subject to the conditions found in Air Emission License A-302-71-O-R/A and the following conditions.

Severability. The invalidity or unenforceability of any provision of this License Amendment or part thereof shall not affect the remainder of the provision or any other provisions. This License Amendment 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 are new conditions:

(29) Carbonizer Incinerator

- A. Intermat is licensed to replace the Carbonizer Incinerator. The new Carbonizer Incinerator shall be subject to all applicable requirements and conditions in Air

Emission License A-302-71-O-R/A as the previous Carbonizer Incinerator.
[06-096 C.M.R. ch. 115, BPT]

- B. Approval to construct the new Carbonizer Incinerator shall become invalid if the source has not commenced construction within eighteen (18) months after issuance of this license amendment 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 C.M.R. ch. 115]
- (30) If the Department determines that any parameter value pertaining to construction and operation of the Carbonizer Incinerator, including but not limited to size, configuration, , emission rates, nearby structures, etc., or deviates from what was submitted in the application for this air emission license, Intermat may be required to submit additional information. Upon written request from the Department, Intermat shall provide information necessary to demonstrate AAQS will not be exceeded, potentially including submission of an ambient air quality impact analysis or an application to amend this air emission license to resolve any deficiencies and ensure compliance with AAQS. Submission of this information is due within 60 days of the Department's written request unless otherwise stated in the Department's letter. [06-096 C.M.R. ch. 115, § 2(O)]

DONE AND DATED IN AUGUSTA, MAINE THIS 11th DAY OF DECEMBER, 2024.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, COMMISSIONER

The term of this license amendment shall be ten (10) years from the issuance of Air Emission License A-302-71-O-R/A (issued 2/23/2024).

[Note: If a renewal application, determined as complete by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 M.R.S. § 10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/28/2024

Date of application acceptance: 10/29/2024

This Order prepared by Lynn Muzzey, Bureau of Air Quality.