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

DEPARTMENT ORDER

Avedis Zildjian Co. **Penobscot County** **Newport, Maine** **A-334-71-H-R**	**Departmental** **Findings of Fact and Order** **Air Emission License** **Renewal**

FINDINGS OF FACT

After review of the air emission license renewal 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

Avedis Zildjian Co. (Zildjian) has applied to renew their Air Emission License for the operation of emission sources associated with their wood products manufacturing facility.

The equipment addressed in this license is located at 34 Progress Park in Newport, Maine. In December 2021, Zildjian completed the relocation of the facility from its previous location at 77 High Street in Newport. The previously licensed Boiler #1, Boiler #2, drying oven, spray line, and wood drying kilns were not relocated to the new facility and are removed from this license.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Make-up Air Units

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (gal/hr)	Fuel Type, % sulfur	Date of Manuf.	Date of Install.
MAU-1	1.2	13	Propane, Negligible	2021	2021
MAU-2	1.2	13	Propane, Negligible	2021	2021
MAU-3	1.2	13	Propane, Negligible	2021	2021

Process Equipment

Equipment	Pollution Control Equipment
Tumble Finishing	none
Dip Finishing	none
Wood Grinding/Cutting	Baghouse #1 (Large)
Wood Sander	Baghouse #2 (Small)
Parts Washer	none

C. Definitions

Records or *Logs* mean either hardcopy or electronic records.

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.

The application for Zildjian does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of currently licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115.

E. Facility Classification

With the facility volatile organic compound (VOC) and hazardous air pollutant (HAP) limits, the facility is licensed as follows:

- As a synthetic minor source of air emissions for criteria pollutants, because Zildjian is subject to license restrictions that keep facility emissions below major source thresholds for VOC; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

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 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment.

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. Make-up Air Units

Zildjian operates three make-up air units (MAU-1, MAU-2, and MAU-3). All three units fire propane and are each rated at a maximum heat input of 1.2 MMBtu/hr based on a fuel heating value of 91.5 MMBtu per 1,000 gallons.

1. BPT Findings

The BPT emission limits for MAU-1, 2, and 3 were based on the following:

$PM/PM_{10}/PM_{2.5}$	–	0.7 lb/1,000 gal based on AP-42, Table 1.5-1 dated 7/08
SO_2	–	0.054 lb/1,000 gal based on AP-42, Table 1.5-1 dated 7/08
NO_x	–	13 lb/1,000 gal based on AP-42, Table 1.5-1 dated 7/08
CO	–	7.5 lb/1,000 gal based on AP-42, Table 1.5-1 dated 7/08
VOC	–	1 lb/1,000 gal based on AP-42, Table 1.5-1 dated 7/08
Visible Emissions	–	06-096 C.M.R. ch. 101

The BPT emission limits for MAU-1, 2, and 3 are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
MAU-1	0.01	0.01	0.01	–	0.17	0.10	0.01
MAU-2	0.01	0.01	0.01	–	0.17	0.10	0.01
MAU-3	0.01	0.01	0.01	–	0.17	0.10	0.01

2. Visible Emissions

Visible emissions from MAU-1, 2, and 3 each shall not exceed 10% opacity on a six-minute block average basis.

3. Periodic Monitoring

Periodic monitoring for MAU-1, 2, and 3 shall include recordkeeping to document fuel use both on a monthly and calendar year total basis.

4. New Source Performance Standards (NSPS): 40 C.F.R. Part 60, Subpart Dc

   MAU-1, 2, and 3 are not "steam generating units" as that term is defined by *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* 40 C.F.R. Part 60, Subpart Dc. In addition, these units each have heat input ratings less than 10 MMBtu/hr. Therefore, MAU–1, 2, and 3 are not subject to the requirements of 40 C.F.R. Part 60, Subpart Dc. [40 C.F.R. § 60.40c]

5. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJJ

   MAU-1, 2, and 3 are not "boilers" as that term is defined by *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ. In addition, propane-fired units are exempt from the requirements of this regulation. Therefore, MAU-1-, 2, and 3 are not subject to the requirements of 40 C.F.R. Part 63, Subpart JJJJJJ.
   [40 C.F.R. §§63.11195(e)]

C. Process Equipment

1. Finishing Operations

   Zildjian operates a series of tumblers and a dip finish operation to apply coatings to their wood products. VOC emissions estimates are based on the quantity of coating used, the coating's respective safety data sheets (SDS) data for percent volatility, and the assumption that all volatile components in the finish are emitted as fugitive VOC.

   Surface Coating Facilities, 06-096 C.M.R. ch. 129 establishes requirements for emissions of VOC and HAP from selected surface coating operations. The coating operations at Zildjian are not included in these selected coating operation categories. Therefore, 06-096 C.M.R. ch. 129 is not applicable to this facility.

   BPT for the tumblers and dip finish operations is determined to be an annual limit on VOC[1] of 35.0 tpy and an annual limit on total HAP of 9.9 tpy, each on a calendar year basis. Compliance shall be demonstrated through records of the VOC and HAP content of each coating and the amount of coating used on a monthly and calendar year basis as described below.

   Zildjian shall record on a monthly basis, the quantity of raw materials purchased and in stock which contain VOC and HAPs. Zildjian shall also maintain records of the VOC and HAP content by weight for each material or the pounds VOC and HAP per gallon of each material. Monthly inventory data shall be used to determine the quantity of

[1] As defined by 06-096 C.M.R. ch. 100 and 40 C.F.R. Part 51.100(s)(1).

each material used per month. The following equations shall be used to calculate VOC and HAP emissions on a monthly and calendar year total basis.

Total VOC

$$\text{Emissions} = \sum_{i=1}^{n} [\begin{pmatrix} \text{Quantity in stock at beginning of the month} \\ -\text{Quantity in stock at the end of the month} \\ +\text{Monthly product purchases} \end{pmatrix} \text{X VOC content}]$$

Where:
n = the number of different coatings in stock at the facility

Total HAPs

$$\text{Emissions} = \sum_{i=1}^{n} [\begin{pmatrix} \text{Quantity in stock at beginning of the month} \\ -\text{Quantity in stock at the end of the month} \\ +\text{Monthly product purchases} \end{pmatrix} \text{X HAP content}]$$

Where:
n = the number of different coatings in stock at the facility

2. Cleaning Stations/ Parts Washers

Zildjian operates several small cleaning stations and two parts washer stations from which very small quantities of VOCs are emitted. The total quantity of VOCs emitted from the cleaning stations is has been determined to be less than 1 ton/year, therefore the cleaning stations are considered insignificant activity pursuant to 06-096 C.M.R. ch. 115, Appendix B(B)(1). Although the emissions from the parts washers are considered insignificant based on the amount of VOC emitted, they are still subject to the operational standards found in *Solvent Cleaners*, 06-096 C.M.R. ch. 130. The parts washers have design capacities of 15 and 30 gallons.

3. Sawdust Collection

Zildjian operates various sawing, grinding, sanding, and wood turning operations. Wood dust and sawdust is collected through pick-up points throughout the building and conveyed pneumatically to one of two baghouses. The large baghouse (Baghouse #1) system controls sawdust from various wood cutting and griding operations. In the winter air exhaust from Baghouse #1 is recirculated into the building to conserve heat. The smaller baghouse (Baghouse #2) system controls wood flour generated from the sanding process.

Visible emissions from each baghouse shall each not exceed an opacity of 10% on a six-minute block average basis.

D. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis.

E. Fugitive Emissions

Zildjian shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.

Zildjian shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22.

F. Emission Statements

Zildjian is subject to emissions inventory requirements contained in *Emission Statements*, 06-096 C.M.R. ch. 137. Zildjian shall maintain the following records in order to comply with this rule:

1. The amount of propane fired in MAU-1, 2, and 3 (each) on a monthly basis;
2. Calculations of the VOC and/or HAP emissions from the finishing operations (tumblers and dip finish) on a monthly and calendar year total basis; and
3. Hours each emission unit was active or operating on a monthly basis.

Every third year, or as requested by the Department, Zildjian shall report to the Department emissions of hazardous air pollutants as required pursuant to 06-096 C.M.R. ch. 137, § (3)(C). The next report is due no later than May 15, 2024, for emissions occurring in calendar year 2023. The Department will use these reports to calculate and invoice for the applicable annual air quality surcharge for the subsequent three billing periods. Zildjian shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3). [38 M.R.S. § 353-A(1-A)]

G. 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 MAU-1, 2, and 3 for 8,760 hours/year each; and
- A VOC limit of 35.0 tpy and a total HAP limit of 9.9 tpy for emissions from the Finishing Operations.

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**	**Total HAP**
MAU-1, 2, and 3 (combined)	0.1	0.1	0.1	–	2.3	1.3	0.2	–
Finishing Operations	–	–	–	–	–	–	35.0	9.9
Total TPY	**0.1**	**0.1**	**0.1**	**–**	**2.3**	**1.3**	**35.2**	**9.9**

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by case basis. In accordance with 06-096 C.M.R. ch. 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	**Tons/Year**
PM_{10}	25
$PM_{2.5}$	15
SO_2	50
NO_x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

This determination is based on information provided by the applicant regarding licensed emission units. If the Department determines that any parameter (e.g., stack size, configuration, flow rate, emission rates, nearby structures, etc.) deviates from what was included in the application, the Department may require Zildjian to submit additional information and may require an ambient air quality impact analysis at that 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, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-334-71-H-R subject to the following conditions.

Severability. The invalidity or unenforceability of any provision of this License or part thereof 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. § 347-C).

(2) The licensee shall acquire a new or amended air emission license prior to beginning actual construction of a modification, unless specifically provided for in Chapter 115. [06-096 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 115]

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S. § 353-A. [06-096 C.M.R. ch. 115]

(6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 115]

(11) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. 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 C.F.R. 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 C.M.R. ch. 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 the written test report by the Department, or another alternative timeframe approved by the Department, 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 C.F.R. 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 C.M.R. ch. 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 license requirement. [06-096 C.M.R. ch. 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 emissions 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 C.M.R. ch. 115]

(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 C.M.R. ch. 115]

(16) The licensee 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. § 605). [06-096 C.M.R. ch. 115]

SPECIFIC CONDITIONS

(17) **Make-up Air Units**

A. MAU-1, 2, and 3 shall each fire only propane. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Emission Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
MAU-1	0.01	0.01	0.01	–	0.17	0.10	0.01
MAU-2	0.01	0.01	0.01	–	0.17	0.10	0.01
MAU-3	0.01	0.01	0.01	–	0.17	0.10	0.01

C. Visible emissions from MAU-1, 2, and 3 each shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, §4(A)(3)]

(18) **Finishing Operations**

A. Zildjian shall limit total HAP emissions to 9.9 tpy and VOC emissions to 35.0 tpy, each on a calendar year basis. Compliance shall be based on coating material purchases as specified in Condition (18)(B) and calculations and emission factors as determined in accordance with Condition (18)(B). [06-096 C.M.R. ch. 115, BPT]

B. To demonstrate compliance with annual emission limits, Zildjian shall record on a monthly basis, the quantity of raw materials purchased and in stock which contain VOC and HAPs. Zildjian shall also maintain records of the VOC and HAP content by weight for each material or the pounds VOC and HAP per gallon of each material. Monthly inventory data shall be used to determine the quantity of each material used per month. The following equations shall be used to calculate VOC and HAP emissions on a monthly and calendar year total basis [06-096 C.M.R. ch. 115, BPT]:

Total VOC

$$\text{Emissions} = \sum_{i=1}^{n}\left[\begin{pmatrix}\text{Quantity in stock at beginning of the month}\\ -\text{Quantity in stock at the end of the month}\\ +\text{Monthly product purchases}\end{pmatrix}\text{X VOC content}\right]$$

Where:
n = the number of different coatings in stock at the facility

Total HAPs

$$\text{Emissions} = \sum_{i=1}^{n}\left[\begin{pmatrix}\text{Quantity in stock at beginning of the month}\\ -\text{Quantity in stock at the end of the month}\\ +\text{Monthly product purchases}\end{pmatrix}\text{X HAP content}\right]$$

Where:
n = the number of different coatings in stock at the facility

(19) **Parts Washers**

Parts washers at Zildjian are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130.

A. Zildjian shall keep records of the amount of solvent added to each parts washer. [06-096 C.M.R. ch. 115, BPT]

B. The following are exempt from the requirements of 06-096 C.M.R. ch. 130 [06-096 C.M.R. ch. 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 06-096 C.M.R. ch. 130.

   1. Zildjian shall attach a permanent conspicuous label to each unit summarizing the following operational standards:
      a. Waste solvent shall be collected and stored in closed containers.
      b. 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.

c. 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.
d. The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
e. Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the parts washer.
f. 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.
g. Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
h. Work area fans shall not blow across the opening of the parts washer unit.
i. 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.
3. Each parts washer shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent.

[06-096 C.M.R. ch. 130]

(20) **Sawdust Collection**

Visible emissions from each baghouse shall not exceed 10% on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(3)]

(21) **General Process Sources**

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

(22) **Fugitive Emissions**

A. Zildjian shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.

B. Zildjian shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22. [06-096 C.M.R. ch. 101, § 4(C)]

(23) **Annual Emission Statements**

A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, Zildjian shall annually report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory. The emission statement shall be submitted as specified by the date in 06-096 C.M.R. ch. 137.

B. Zildjian shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:

1. The amount of propane fired in MAU-1, 2, and 3 (each) on a monthly basis;
2. Calculations of the VOC and HAP emissions from the finishing operations (tumblers and dip finish) on a monthly and calendar year total basis; and
3. Hours each emission unit was active or operating on a monthly basis.

[06-096 C.M.R. ch. 137]

C. Every third year, or as requested by the Department, Zildjian shall report to the Department emissions of hazardous air pollutants as required pursuant to 06-096 C.M.R. ch. 137, § (3)(C). The next report is due no later than May 15, 2024, for emissions occurring in calendar year 2023. Zildjian shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3).
[38 M.R.S. § 353-A(1-A)]

(24) If the Department determines that any parameter value pertaining to construction and operation of the emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, Zildjian may be required to submit additional information. Upon written request from the Department, Zildjian 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 29th DAY OF MAY, 2024.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____ for _____
MELANIE LOYZIM, COMMISSIONER

The term of this license shall be ten (10) years from the signature date above.

[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: 2/17/2023
Date of application acceptance: 2/21/2023

Date filed with the Board of Environmental Protection:

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

FILED

MAY 29, 2024

State of Maine
Board of Environmental Protection