



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

DEPARTMENT ORDER

IN THE MATTER OF:

POLYVANTIS SANFORD LLC)	LICENSE TRANSFER
TRANSFER FROM)	Site Location of Development
ROEHM AMERICA LLC)	Air Emission
SANFORD, YORK COUNTY)	UIC
L-013713-29-I-T)	
A-393-71-AH-T)	APPROVAL

Pursuant to the provisions of the *Site Location of Development law*, 38 M.R.S. §§ 481–489-E; *Protection and Improvement of Air laws*, 38 M.R.S. §§ 344 and 581–610-D; Underground Injection Control (/UIC) program, 06-096 C.M.R. ch. 543 rules promulgated pursuant to these laws and the Department’s *Rule Concerning the Processing of Applications and Other Administrative Matters*, 06-096 C.M.R. ch. 2 (2018), the Maine Department of Environmental Protection (Department) has considered the application of POLYVANTIS Sanford LLC with its supportive data, agency review comments, and other related materials on file and FINDS THE FOLLOWING FACTS:

1. APPLICATION SUMMARY

On May 17, 2024, POLYVANTIS Sanford LLC, (Applicant), submitted an application to the Department for the transfer of all active licenses, as defined in 06-096 C.M.R. ch. 2, § 1(L), and any applications pending, relating to the former Roehm America LLC (Roehm) manufacturing facility (the Facility) located at 1796 Main Street in Sanford, Maine. The previous owner of the Facility, Roehm, was previously named Evonik Cyro LLC and changed its name to Roehm America LLC in 2019. The facility currently holds Department licenses for Site Location of Development and air emissions, has a Class V Underground Injection Control Well registration, and is a party in a Memorandum of Agreement regarding oil spill reporting.

The Department accepted the Applicant’s license transfer application as complete for processing on June 7, 2024. A schedule of licenses and applications that are the subject of the application, and this Department Order, is set forth in Appendix A. The intent of this Order is to transfer any active licenses or pending applications that apply to the Facility. Any active Department license or application concerning the Facility not specifically listed in this Order is incorporated herein.

POLYVANTIS SANFORD LLC
Multi-Program License Transfer
SANFORD, YORK COUNTY

) LICENSE TRANSFER
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2. TRANSFER REQUIREMENTS

The applicant submitted the following information in support of the transfer application:

- A. Applicant.** The full name and address of the Applicant is: POLYVANTIS Sanford LLC, 1796 Main Street, Sanford, Maine, 04073. The Applicant is a duly organized Delaware limited liability corporation in good standing and is a duly qualified foreign limited liability company registered with the Maine Secretary of State.
- B. Title, Right, or Interest.** The Applicant has submitted a Real Property Contribution and Transfer Agreement, dated May 1, 2024, demonstrating the transfer of ownership of the Facility to the Applicant. The Department finds that this Agreement provides sufficient evidence of title to the Facility to allow the transfer of licenses and applications to the Applicant.
- C. Financial Capacity and Intent.** The Applicant has submitted a financial statement indicating sufficient funds dedicated to the Applicant by Roehm. The Department finds that the Applicant has demonstrated sufficient financial capacity and intent to assure compliance with all Department licenses relating to the Facility.
- D. Technical Capacity and Intent.** The Applicant states that existing personnel will remain responsible for the continued operation of the Facility and for ensuring compliance with all conditions of licenses. The Applicant has also retained Sevee & Maher Engineers to continue to perform monthly air emissions sampling, and to assist in the EHS compliance oversight at the facility.

The Department finds that the information submitted in the application provides sufficient evidence that the Applicant has the technical capacity and intent to comply with all Department licenses, pending applications, and any statutory and regulatory criteria applicable to the Facility.

- E. Air Emissions Certification.** The Applicant certifies that there will be no increase in air emissions beyond that provided for in the existing licenses, either in quantity or type, without Department approval.

BASED ON THE ABOVE FINDINGS OF FACT, the Department CONCLUDES that POLYVANTIS Sanford LLC has demonstrated title, right, or interest to the Facility as well as the technical and financial capacity and intent to comply with the conditions of all Department licenses and pending applications associated with the Facility described in this Order's findings, including without limitation those licenses and applications listed in Appendix A, and to satisfy all applicable statutory and regulatory criteria, subject to the conditions set forth below.

POLYVANTIS SANFORD LLC

Multi-Program License Transfer

SANFORD, YORK COUNTY

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LICENSE TRANSFER

APPROVAL

THEREFORE, the Department APPROVES the application of POLYVANTIS Sanford LLC
SUBJECT TO THE FOLLOWING CONDITIONS and all applicable standards:

1. EFFECT ON EXISTING ORDERS. All other Findings of Fact, Conclusions, and Conditions associated with all approvals that are the subject of this Order remain as approved and are incorporated herein.
2. 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.

DONE AND DATED AT AUGUSTA, MAINE THIS 17th DAY OF DECEMBER, 2024.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

By: Melanie Loyzim
Melanie Loyzim, Commissioner

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 5/17/2024

Date application accepted for processing: 6/7/2024

POLYVANTIS SANFORD LLC
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APPENDIX A: LICENSES AND APPLICATIONS

Air Emissions Licenses		
Number	Description	Approved
A-393-71-V-R/M	Renewal/Amendment	5/7/2013
A-393-71-AA-M	Clarified thermal oxidizer monitoring	2/18/2015
A-393-71-AB-M	Various small changes	12/8/2017
A-393-71-AD-M	Removed equipment and lowered VOC limit	1/19/2021
A-393-71-AE-M	Addition of emergency generator	4/30/2021
A-393-71-AF-M	Addressed chemical transfer process	9/7/2022
A-393-71-AG-R	Renewal	Pending

Site Location of Development / NRPA Licenses		
Number	Description	Approved
L-003997-08-A-X	Stream alterations (originally 08-3997-31230)	10/7/1977
L-013713-29-A-N	Above ground oil tanks	9/25/1986
L-013713-29-B-C	Condition Compliance #2	6/29/1988
L-013713-29-C-A	Chemical tanks/containment structures	6/14/1988
L-013713-L3-C-M	Carbon steel tanks in lieu of stainless steel	9/18/1990
L-13713-29-D-M	Modification of haz-mat tanks	12/6/1991
L-13713-29-E-C	Condition Compliance monitoring	8/4/1992
L-13713-29-F-M	Disposal of non-contact cooling waters from Plant #2 via subsurface infiltration system	12/9/1998
L-013713-29-G-M	Modification of cooling water infiltration system	11/10/1999

Miscellaneous		
Number	Description	Approved
N/A	Memorandum of Agreement - Oil Spill Reporting	9/7/2023
400309	Class V Underground Injection Control	12/8/2022