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

DEPARTMENT ORDER

Downeast Machine and Engineering, Inc. **Androscoggin County** **Mechanic Falls, Maine** **A-1101-71-B-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

Downeast Machine and Engineering, Inc. (DM&E) has applied to renew their Air Emission License for the operation of emission sources associated with their machine design, engineering, and construction facility.

The equipment addressed in this license is located at 26 Maple Street, Mechanic Falls, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Process Equipment

Equipment	Pollution Control Equipment	Stack #
Spray Booth	Particulate Filters HVLP Spray Guns	S-11
Sandblasting	Unvented Cabinet	None
Parts Washer	None	None

DM&E also has several small unit heaters not listed in the table above. These are considered insignificant emissions units because they are each rated below 1.0 MMBtu/hr, the heat input capacity at or above which would require their inclusion in the license; therefore, these small unit heaters are not addressed further in this license.

DM&E has a plasma cutter which vents inside the building. Since the unit is not expected to emit VOC or HAP, it is considered an insignificant activity per 06-096 C.M.R. ch. 115, Appendix B § (A)(66).

C. Definitions

Cleaning Activities means the use of solvents to remove contaminants including, but not limited to, adhesives, inks, paint, dirt, soil, oil, and grease from parts, products, tools, machinery, equipment, vessels, and work production related areas for a variety of reasons, including safety, operability, and to avoid product contamination; this includes activities such as wiping, flushing, or spraying. Examples of such activities may include, but are not limited to, the cleaning of spray booths, spray guns, and printing presses.

Industrial Cleaning Solvents means products containing VOC when used for cleaning activities applied to items and surfaces used in manufacturing, processing, mining, and refining or other manufacturing activities.

Metal fabrication and finishing HAP (MFHAP) means any compound of the following metals: cadmium, chromium, lead, manganese, or nickel, or any of these metals in the elemental form, with the exception of lead.

Material containing MFHAP – A material containing one or more MFHAP. Any material that contains cadmium, chromium, lead or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Safety Data Sheet for the material, is considered to be a material containing MFHAP.

Normally closed container means a container that is closed unless material is being actively added to or removed from it. The container is considered closed when sealed to the extent that the contents, including gaseous components, are kept within the container.

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 DM&E 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 VOC limits associated with the spray booth, the facility is licensed as follows:

- As a synthetic minor source of air emissions for criteria pollutants, because DM&E 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. Spray Booth

DM&E operates a spray booth for the coating/finishing of miscellaneous metal parts manufactured at the facility. DM&E does not employ coatings containing MFHAP as defined in 40 C.F.R. § 63.11522.

1. Control Equipment

The spray booth is equipped with filters for control of emissions of particulate matter (PM). Emissions of PM from the spray booth are considered unquantifiable. However, DM&E shall maintain the filters so as to minimize PM emissions such that visible emissions from the spray booth do not exceed 10% opacity on a six-minute block average basis.

DM&E uses High Volume Low Pressure (HVLP) spray guns which have a higher transfer efficiency than conventional spray guns. Use of HVLP guns significantly reduces the amount of paint used and thereby reduces emissions of VOC and HAP from the painting process.

2. 06-096 C.M.R. ch. 129

DM&E is subject to *Surface Coating Facilities*, 06-096 C.M.R. ch. 129. DM&E is a facility which performs surface coating of miscellaneous metal parts and products.

Previously, DM&E had accepted a license restriction of 1,666 lb of VOC per month from all surface coating emissions. Ch. 129 was amended on July 7, 2015, to include a lower applicability threshold for this chapter. In order to avoid emission limitations pursuant to 06-096 C.M.R. ch. 129 § 3, DM&E has proposed to reduce their VOC limit to less than 2.7 tons per year.

DM&E shall maintain monthly records on site which document the following:

a. Name and identification of each coating used or stored on site.
b. Mass of VOC per volume of each coating, excluding water and exempt compounds, as applied.
c. Amount of each coating used each month.
d. Total emissions of VOC and HAP from the coating facility on a monthly basis.

The VOC/HAP content of each coating may be derived from Safety Data Sheets provided by the supplier.

DM&E is subject to the work practices contained in Section 5 of 06-096 C.M.R. ch. 129. These requirements include the following:

a. Vapor-tight containers shall be used for the storage of spent or fresh VOC containing compounds and for the storage of or disposal of cloth or paper impregnated with VOC that are used for surface preparation, clean up, or coating removal.
b. The use of VOC is prohibited for cleanup operations unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.
c. DM&E shall collect all organic solvent used to clean spray guns into a normally closed container.
d. DM&E shall pump or drain all organic solvent used for line cleaning into a normally closed container.
e. DM&E shall not use compounds containing more than 8.0% by weight VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, and/or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, DM&E may not use more than 1.0 gallon of organic solvent to prepare the booth prior to applying the booth coating.

f. DM&E shall control emissions from washoff operations by using normally closed tanks for washoff and minimizing dripping by tilting or rotating the part to drain as much organic solvent as possible.

3. *NESHAPS Area Source Standards for Nine Metal Fabrication and Finishing Source Categories* – 40 C.F.R. Part 63, Subpart XXXXXX (Subpart XXXXXX)

Since DM&E uses spray painting equipment to apply coatings, none of which contain MFHAP, to a metal surface, they are not subject to Subpart XXXXXX for spray painting.

4. BPT

BPT for the Spray Booth is determined to be the following:

a. Use HVLP paint guns to minimize VOC and HAP.
b. Employ suitable exhaust filters for the spray booth to limit PM emissions.
c. Keep inspection and maintenance log for the exhaust filters in the spray booth.
d. Keep monthly records of paints, coatings, and solvents, and their respective HAP/VOC contents.
e. Limit visible emissions to less than 10% opacity on a six-minute block average basis.
f. Limit VOC emissions to less than 400 lbs per month.
g. Limit HAP emissions to less than 400 lbs per month.
h. Practice good housekeeping to minimize fugitive emissions of VOC and HAPs, i.e. keep containers covered when not in use, properly store or dispose of excess coatings or solvents, promptly clean and dispose of spilled coatings and solvents.
i. Employ work practices in 06-096 C.M.R. ch. 129 § 5(B) for cleaning spray guns, paint booths, line cleaning, and washoff operations, and per 06-096 C.M.R. ch. 129 § 5(A) DM&E shall use vapor-tight containers for the storage of spent or fresh VOC and for the storage or disposal of cloth or paper impregnated with VOC that are used for surface preparation, clean up, or coating removal.

C. Sandblasting Operations

DM&E occasionally conducts sandblasting, using a Marco 150 lb capacity, gravity fed, pressure pot to prepare parts for finishing. DM&E will conduct abrasive blasting operations in a small, enclosed, unvented cabinet. No abrasive sandblasting activities will be performed outside of the unvented cabinet.

PM emissions from this operation are subject to Subpart XXXXXX and are addressed in a subsequent section of this license.

D. Machining Operations

The facility employs several machining operations including, but not limited to: cutting, drilling, broaching, and milling (manual and CNC). Cutting operations include cut-off saws, bandsaws, and a plasma cutter.

PM emissions from this operation are subject to Subpart XXXXXX and are addressed in a subsequent section of this license.

E. Dry Grinding/Polishing Operations

The facility employs various dry grinding and polishing operations as either required by customer specifications or as necessary to conduct various downstream machining, welding, or coating operations.

PM emissions from this operation are subject to Subpart XXXXXX and are addressed in a subsequent section of this license.

F. Welding

The facility conducts limited welding operations at this facility and utilizes less than 2,000 lbs of welding rod containing MFHAP per year on a 12-month rolling basis. This makes them exempt from Subpart XXXXXX fugitive and opacity requirements, pursuant to Subpart XXXXXX § 63.11516(f). The work practices that welding operations are subject to in Subpart XXXXXX, regardless of the exemptions from certain other requirements, are addressed in a subsequent section of this license.

DM&E shall maintain a record of welding rod usage on a monthly and 12-month rolling basis to continue to demonstrate exemption.

G. 40 C.F.R. Part 63, Subpart XXXXXX

1. Standards and Management Practices [40 C.F.R. § 63.11516]

   a. Standards for Dry Abrasive Blasting in Totally Enclosed and Unvented Blast Chambers

      1) DM&E shall minimize dust generation during emptying of abrasive blasting enclosures.

      2) DM&E shall operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.

b. Standards for Machining

1) DM&E shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable.

2) DM&E shall operate all equipment associated with machining according to manufacturer's instructions.

[40 C.F.R. § 63.11516(b)]

c. Standards for Dry Grinding and Dry Polishing with machines

1) DM&E shall capture emissions and vent them to a filtration control device. DM&E shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in § 63.11519(c)(4).

2) DM&E shall take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable.

3) DM&E shall operate all equipment associated with machining according to manufacturer's instructions.

[40 C.F.R. § 63.11516(c)]

d. Standards for Welding

1) DM&E shall operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. Compliance shall be demonstrated by maintaining a record of manufacturer's specifications for the capture and control devices, as specified by the requirements in § 63.11519(c)(4).

2) DM&E shall implement one or more of the following management practices:
   a) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW) – also called metal inert gas welding (MIG));
   b) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
   c) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
   d) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
   e) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

[40 C.F.R. § 63.11516(f)]

2. Notification and Reporting Requirements [40 C.F.R. § 63.11519]

   a. DM&E shall submit an Initial Notification no later than 120 days after DM&E becomes subject to Subpart XXXXXX. The initial notification must include the following:
      1) The name, address, phone number and e-mail address of the owner and operator;
      2) The address (physical location) of the affected source;
      3) The identification of the relevant standard (this subpart); and
      4) A brief description of the type of operation. For example, a brief characterization of the types of products, the number and types of processes, and the number of workers usually employed.

   b. DM&E shall submit a Notification of Compliance Status no later than 120 days after initial startup. The notification of compliance status must include the following:
      1) Company name and address;
      2) A statement by a responsible official with that official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart; and
      3) The date of the notification of compliance status.

   c. DM&E shall prepare and submit an annual certification and compliance report to the Department and EPA according to the following:

      1) The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.
      2) Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.
      3) Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review.
      4) The annual certification and compliance report must contain the following information:
         a) Company name and address;
         b) Statement by a responsible official with that official's name, title, and signature, certifying the truth accuracy, and completeness of the content of the report; and
         c) Date of the report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. The information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

3. Recordkeeping Requirements [40 C.F.R. § 63.11519]

   DM&E shall collect and keep records of data and information according to the paragraphs below:

   a. Compliance and Applicability Records

      1) Each notification and report that was submitted to comply with this subpart, and the documentation supporting each notification and report.

      2) Records of the applicability determinations as in § 63.11514(b)(1) through (5), listing equipment included in its affected source, as well as any changes to that and on what date they occurred, shall be maintained for 5 years and be made available for inspector review at any time.

   b. DM&E shall maintain a record of the manufacturer's specifications for the control devices used to comply with § 63.11516.

   c. DM&E shall maintain copies of the manufacturer's instructions for operation of equipment, readily available for inspector review.

   d. DM&E shall maintain records demonstrating welding rod usage on a 12-month rolling total basis.

   e. DM&E shall maintain records according to the following requirements:

      1) Records shall be in a form suitable and readily available for expeditious review, according to § 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

      2) DM&E shall keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.

      3) DM&E shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to § 63.10(b)(1). DM&E may keep the records off-site for the remaining 3 years.

   f. Note: Standard Condition (8) of this license requires all records be retained for six years; therefore, the record retention requirements of Subpart XXXXXX are satisfied by compliance with the more stringent six-year requirement.

H. Parts Washer

DM&E operates a parts washer, with a 20-gallon capacity, subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130 and records shall be kept documenting compliance.

Because Parts Washers are regulated under 06-096 C.M.R. ch. 130, this equipment is exempt from *Industrial Cleaning Solvents*, 06-096 C.M.R. ch. 166 pursuant to Section (3)(B).

I. General Process Emissions

Visible emissions from any general process source not already specifically addressed in this license shall not exceed 20% opacity on a six-minute block average basis.

J. Fugitive Emissions

DM&E 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.

DM&E 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.

K. 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 limiting emissions from facility surface coating operations to 400 lb of VOC per month and facility-wide emissions to 400 lb of HAP per month.

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	HAP
Surface Coating	-	-	-	-	-	-	2.4	-
Facility Wide Limit	-	-	-	-	-	-	-	2.4
Total TPY	**-**	**-**	**-**	**-**	**-**	**-**	**2.4**	**2.4**

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 DM&E 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-1101-71-B-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] Payment of the annual air emission license fee for DM&E is due by the end of November of each year. [38 M.R.S. § 353-A(3)]

(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]

SPECIFIC CONDITIONS

(17) **Spray Booth**

A. DM&E shall install and maintain filters for control of PM from the Spray Booth. [06-096 C.M.R. ch. 115, BPT]

B. DM&E shall keep an inspection and maintenance log of PM filters on the Spray Booth exhaust. [06-096 C.M.R. ch. 115, BPT]

C. DM&E shall only use HVLP spray guns in the Spray Booth. [06-096 C.M.R. ch. 115, BPT]

D. Visible emissions from the Spray Booth shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

E. DM&E shall not exceed emissions of 400 lb of VOC per month from all surface coating operations. [06-096 C.M.R. ch. 115, BPT]

F. DM&E shall not exceed emissions of 400 lb of HAP per month from all surface coating operations. [06-096 C.M.R. ch. 115, BPT]

G. DM&E shall maintain monthly records on site which document the following:

1. Name and identification of each coating used or stored on site.
2. Mass of VOC per volume of each coating, excluding water and exempt compounds, as applied.
3. Amount of each coating used each month.
4. Total emissions of VOC and HAP from the coating facility on a monthly basis.

[06-096 C.M.R. ch. 129]

H. Vapor-tight containers shall be used for the storage of spent or fresh VOC containing compounds and for the storage or disposal of cloth or paper impregnated with VOC that are used for surface preparation, clean up, or coating removal. [06-096 C.M.R. ch. 129]

I. The use of VOC is prohibited for cleanup operations unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere. [06-096 C.M.R. ch. 129]

J. DM&E shall collect all organic solvent used to clean spray guns into a normally closed container. [06-096 C.M.R. ch. 129]

K. DM&E shall pump or drain all organic solvent used for line cleaning into a normally closed container. [06-096 C.M.R. ch. 129]

L. DM&E shall not use compounds containing more than 8.0% by weight VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, and/or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating, or other material used to cover the booth is being replaced, DM&E may not use more than 1.0 gallon of organic solvent to prepare the booth prior to applying the booth coating. [06-096 C.M.R. ch. 129]

M. DM&E shall control emissions from washoff operations by using normally closed tanks for washoff and minimize dripping by tilting or rotating the part to drain as much organic solvent as possible. [06-096 C.M.R. ch. 129]

(18) **Sandblasting Operations**

A. DM&E shall limit sandblasting activity to inside of totally enclosed, unvented cabinet. [06-096 C.M.R. ch. 115, BPT]

B. DM&E shall minimize dust associated with their sandblasting cabinet by minimizing dust generation during emptying of abrasive blasting enclosures. [40 C.F.R. § 63.11516(a)(1)(ii)]

C. DM&E shall operate all equipment associated with dry abrasive blasting according to the manufacturer's instructions. [40 C.F.R. § 63.11516(a)(1)(ii)]

(19) **Machining Operations**

A. DM&E shall minimize excess dust associated with their machining operations in the surrounding area to reduce MFHAP emissions, as practicable. [40 C.F.R. § 63.11516(b)(1)]

B. DM&E shall operate all equipment associated with their machining operations according to the manufacturer's instructions. [40 C.F.R. § 63.11516(b)(2)]

(20) **Dry Grinding/Polishing Operations**

A. DM&E shall capture emissions and vent them to a filtration control device. [40 C.F.R. § 63.11516(c)(1)]

B. DM&E shall maintain records of the control devices utilized with dry grinding and polishing operations as specified by the manufacturer. [40 C.F.R. § 63.11516(c)(2)(ii)]

C. DM&E shall minimize dust associated with their dry grinding and polishing operations to reduce MFHAP emissions, as practicable. [40 C.F.R. § 63.11516(c)(2)(i)]

(21) **Welding**

A. DM&E shall keep records of the lbs. of welding rods used on a monthly and 12-month rolling basis. [06-096 C.M.R. ch. 115, BPT]

B. DM&E shall maintain records of the control devices utilized with welding operations as specified by the manufacturer. [06-096 C.M.R. ch. 115, BPT]

C. DM&E shall implement one or more of the following management practices:
   1. Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW) – also called metal inert gas welding (MIG));

2. Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
3. Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
4. Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
5. Use a welding fume capture and control system, operated according to the manufacturer's specifications.

[40 C.F.R. § 63.11516(f)(2)]

(22) **40 C.F.R. Part 63, Subpart XXXXXX**

Notification and Reporting Requirements [40 C.F.R. § 63.11519]

A. DM&E shall submit an Initial Notification no later than 120 days after DM&E becomes subject to Subpart XXXXXX. The initial notification must include the following:
   1. The name, address, phone number and e-mail address of the owner and operator;
   2. The address (physical location) of the affected source;
   3. The identification of the relevant standard (this subpart); and
   4. A brief description of the type of operation. For example, a brief characterization of the types of products, the number and types of processes, and the number of workers usually employed.

B. DM&E shall submit a Notification of Compliance Status no later than 120 days after initial startup. The notification of compliance status must include the following:
   1. Company name and address;
   2. A statement by a responsible official with that official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart; and
   3. The date of the notification of compliance status.

C. DM&E shall prepare and submit an annual certification and compliance report to the Department and EPA according to the following:

   1. The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.
   2. Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.
   3. Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review.

4. The annual certification and compliance report must contain the following information:
   a. Company name and address;
   b. Statement by a responsible official with that official's name, title, and signature, certifying the truth accuracy, and completeness of the content of the report; and
   c. Date of the report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. The information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(23) **Parts Washer**

Parts washer at DM&E are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130.

A. DM&E 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. DM&E 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. The 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]

(24) **General Process Sources**

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

(25) **Fugitive Emissions**

A. DM&E 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. DM&E 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)]

(26) 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, DM&E may be required to submit additional information. Upon written request from the Department, DM&E 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 27th DAY OF JANUARY, 2026.

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: September 6, 2024
Date of application acceptance: September 17, 2024

This Order prepared by Zac Hicks, Bureau of Air Quality.