



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

DEPARTMENT ORDER

Cives Corporation d/b/a Cives Steel
Company, New England Division
Kennebec County
Augusta, Maine
A-1175-71-B-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

Cives Corporation d/b/a Cives Steel Company, New England Division (Cives) was issued Air Emission License A-1175-71-A-N on July 2, 2024, for the operation of emission sources associated with their structural steel production facility. Cives has requested a minor revision to their license in order to replace the Fume Extractors, which are pollution control equipment for the Hand Welding Operations, with Air Filtration Towers.

The equipment addressed in this license amendment is located at 103 Lipman Rd, Augusta, Maine.

B. Emission Equipment

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

Process Equipment

Equipment	Emissions	Pollution Control Equipment
Hand Welding Operations	MFHAP	<i>Fume Extractors</i> * Air Filtration Towers (4) **

* Removed from the license

** New to the license

C. Definitions

Metal Fabrication and Finishing Hazardous Air Pollutants (MFHAP) means any compound of the following metals: cadmium, chromium, lead, manganese, or nickel; or any of these metals in elemental form, except lead.

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.

This amendment will not increase licensed emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

E. Facility Classification

With the annual VOC limits associated with the painting operations, the facility is licensed as follows:

- As a synthetic minor source of air emissions for criteria pollutants, because Cives 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 new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

B. Air Filtration Towers

Cives proposes to replace the Fume Extractors used to control particulate matter (PM) emissions from hand welding operations at the facility with four Air Filtration Towers that will be located throughout the main facility building. Emissions from the hand welding operations at the facility are not quantifiable; however, the replacement of the Fume Extractors with Air Filtration Towers will have an overall net decrease on the facility's air emissions due to their increased control efficiency. The Facility Diagram in Figure 1 shows the approximate location of the towers in the main facility building.

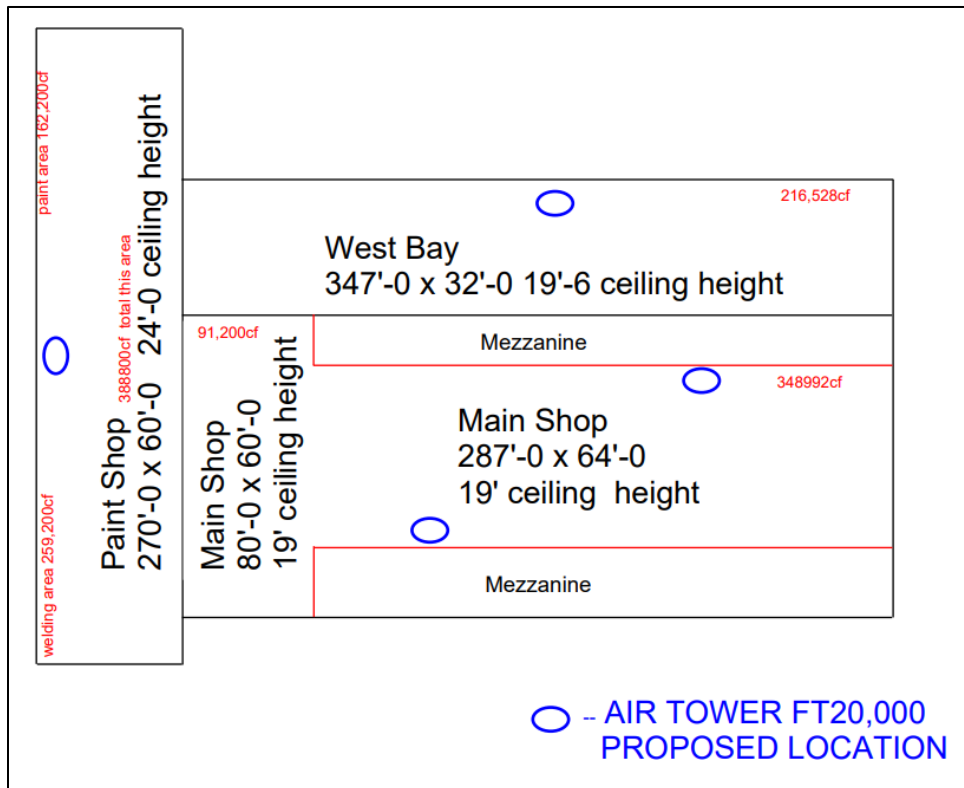


Figure 1. Facility Diagram

Each Air Filtration Tower applies a multi-stage cyclone pre-cleaner to separate larger PM emissions from the exhaust stream. The separated PM is collected within the Air Filtration Towers in a two-part dust collection drawer, which must be emptied periodically. Then, the exhaust air is sent through filter cartridges to collect smaller PM emissions. The differential pressure across these filters is monitored. Automatic cleaning of the filters via compressed air is triggered when the pressure is beyond acceptable ranges. Following these two steps, a secondary filtration system is used as a polishing step before clean air is recirculated back into the main facility building. The filtered air leaves through three large outlet openings at the bottom of each Air Filtration Tower.

The Air Filtration Towers shall meet the following conditions:

1. The Air Filtration Towers shall be equipped with filtration cartridges with a design PM control efficiency of 99.9%.
2. The Air Filtration Towers shall be operated and maintained per the original equipment manufacturer's specifications. Cives shall maintain a copy of the manufacturer's specifications and make them available to the Department upon request.

3. Cives shall conduct monthly inspections of the Air Filtration Towers to ensure proper operation. Filtration cartridges shall be replaced as necessary, and the dust collection drawers shall be emptied as part of the monthly inspections.
4. Cives shall maintain records of inspections and maintenance of the Air Filtration Towers, as well as filtration cartridges' failures and replacements.

C. Annual Emissions

This license amendment will not change the facility's licensed annual emissions.

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-1175-71-B-M subject to the conditions found in Air Emission License A-1175-71-A-N 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 shall replace Condition (18)(B) of Air Emission License A-1175-71-A-N:

(18) Steel Manufacturing

B. Air Filtration Towers

1. The Air Filtration Towers shall be equipped with filtration cartridges with a design PM control efficiency of 99.9%.
2. The Air Filtration Towers shall be operated and maintained per the original equipment manufacturer's specifications. Cives shall maintain a copy of the manufacturer's specifications and make them available to the Department upon request.

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5

3. Cives shall conduct monthly inspections of the Air Filtration Towers to ensure proper operation. Filtration cartridges shall be replaced as necessary, and the dust collection drawers shall be emptied as part of the monthly inspections.
4. Cives shall maintain records of inspections and maintenance of the Air Filtration Towers, as well as filtration cartridges' failures and replacements.

[06-096 C.M.R. ch. 115, BACT]

The following shall replace Condition (18)(E) of Air Emission License A-1175-71-A-N:

(18) Steel Manufacturing

E. Hand Welding Operations

MFHAP emissions from hand welding shall be contained within the building and controlled by Air Filtration Towers that vent internally within the building.

[06-096 C.M.R. ch. 115, BACT]

DONE AND DATED IN AUGUSTA, MAINE THIS 13th DAY OF NOVEMBER, 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-1175-71-A-N (issued 7/2/2024).

[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: October 3, 2024
Date of application acceptance: October 3, 2024

This Order prepared by Kendra Nash, Bureau of Air Quality.