



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.  
GOVERNOR

MARTHA KIRKPATRICK  
COMMISSIONER

UNITED TECHNOLOGIES	)	DEPARTMENTAL
PRATT & WHITNEY	)	FINDING OF FACT AND ORDER
YORK COUNTY	)	AIR EMISSION LICENSE
NORTH BERWICK, MAINE	)	AMENDMENT #6
A-453-71-N-M	)	

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

**I. REGISTRATION**

Introduction

Pratt & Whitney, located in North Berwick, Maine is being required by EPA to amend their current air emission license, A-453-73-G-A/R, to include the emission limit requirements and recordkeeping as expressed in the Aerospace Control Technique Guideline (CTG).

**II. REVISION DESCRIPTION**

Air Emission License Amendment #3, A-453-71-J-M, issued May 25, 1999 addresses the applicability of the Aerospace CTG to Pratt & Whitney. The amendment addresses the CTG by incorporating its requirements by reference with the following statement, "Pratt & Whitney shall limit VOC emissions by incorporation of the Aerospace Control Technique Guideline as described in 63 FR 15016, dated March 27, 1998. USEPA has directed the MEDEP to reference the actual CTG (not just the Federal Register notice) and USEPA also recommends that the coating VOC content limits and recordkeeping portions, expressed in the CTG, be included in an air emission license amendment. Therefore, this minor revision will include the appropriate CTG reference, VOC content table, and recordkeeping.

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

The Department hereby grants Air Emission License A-453-71-N-M, subject to the conditions found in Air Emission License A-453-73-G-A/R, and subsequent amendments, and in the following conditions:

- (1) The following condition shall replace Condition (1) of Air Emission License Amendment, A-453-71-J-M:

Pratt & Whitney is subject to the Aerospace Control Technique Guideline (EPA-453/R-97-004 dated December 1997). The CTG's applicable requirements apply upon the date of issuance of this minor revision. Pratt & Whitney shall meet the VOC limits in the following table, taken from the Aerospace CTG:

(a) SPECIALTY COATINGS VOC CONTENT LIMITS<sup>a</sup> (g/L)<sup>b</sup>

Coating type	Limit
Ablative Coating.....	600
Adhesion Promoter.....	890
Adhesive Bonding Primers:	
Cured at 250°F or below.....	850
Cured above 250°F.....	1030
Adhesives:	
Commercial Interior Adhesive.....	760
Cyanoacrylate Adhesive.....	1,020
Fuel Tank Adhesive.....	620
Nonstructural Adhesive.....	360
Rocket Motor Bonding Adhesive.....	890

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Rubber-based Adhesive.....	850
Structural Autoclavable Adhesive.....	60
Structural Nonautoclavable Adhesive.....	850
Antichafe Coating.....	660
Bearing Coating.....	620
Caulking and Smoothing Compounds.....	850
Chemical Agent-Resistant Coating.....	550
Clear Coating.....	720
Commercial Exterior Aerodynamic	
Structure Primer.....	650
Compatible Substrate Primer.....	780
Corrosion Prevention Compound.....	710
Cryogenic Flexible Primer.....	645
Cryoprotective Coating.....	600
Dry Lubricative Material.....	880
Electric or Radiation-Effect Coating.....	800
Electrostatic Discharge and Electromagnetic	
Interference (EMI) Coating.....	800
Elevated-Temperature Skydrol-Resistant	
Commercial Primer.....	740
Epoxy Polyamide Topcoat.....	660
Fire-Resistant (interior) Coating.....	800
Flexible Primer.....	640
Flight-Test Coatings:	
Missile or Single Use Aircraft.....	420
All Other.....	840
Fuel-Tank Coating.....	720
High-Temperature Coating.....	850
Insulation Covering.....	740
Intermediate Release Coating.....	750
Lacquer.....	830
Maskants:	
Bonding Maskant.....	1,230
Critical Use and Line Sealer Maskant.....	1,020

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Seal Coat Maskant.....	1,230
Metallized Epoxy Coating.....	740
Mold Release.....	780
Optical Anti-Reflective Coating.....	750
Part Marking Coating.....	850
Pretreatment Coating.....	780
Rain Erosion-Resistant Coating.....	850
Rocket Motor Nozzle Coating.....	660
Scale Inhibitor.....	880
Screen Print Ink.....	840
Sealants:	
Extrudable/Rollable/Brushable Sealant.....	280
Sprayable Sealant.....	600
Silicone Insulation Material.....	850
Solid Film Lubricant.....	880
Specialized Function Coating.....	890
Temporary Protective Coating.....	320
Thermal Control Coating.....	800
Wet Fastener Installation Coating.....	675
Wing Coating.....	850

<sup>a</sup> The definitions of the above coatings can be found in Appendix A of the Aerospace CTG.

<sup>b</sup> Coating limits are expressed in terms of mass (grams) or VOC per volume (liter) of coating less water and less exempt solvent.

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- (b) The following coating applications are exempt from the VOC content limits listed in the above table:
- i. Touchup, aerosol, and DoD "classified" coatings
  - ii. Coating of space vehicles
  - iii. Facilities that use separate formulations in volumes of less than 50 gallons per year subject to a maximum exemption of 200 gallons total for such formulations applied annually.
- (c) Primers, topcoats, Chemical Milling Maskants. The broad categories of primers, topcoats (including self-priming topcoats), and chemical milling maskants (Type I/II) are not specialty coatings as listed in the above table and are regulated for major sources under the Aerospace NESHAP requiring MACT limits with a compliance date of September 1, 1998 as specified in 40 CFR 63.7491a). These limits may be assumed to represent RACT limits 1 year after the major sources are required to meet the MACT limits and, therefore, shall not be effective until 1 year after the NESHAP compliance date. The requirements do not apply to facilities that use separate formulations of primers, topcoats, and chemical milling maskants (Type I/II) in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons total for such formulations applied annually.
- (2) Pratt & Whitney shall meet the requirements of Section (B.3)(b) "Application Equipment", Section (B.3)(c) "Solvent Cleaning", and Section (B.3)(d) "Control Equipment and Monitoring", as stated in the Aerospace CTG (EPA-453/R-97-004).
- (3) Pratt & Whitney shall maintain the following recordkeeping requirements and use the appropriate test methods per the Aerospace CTG:

RECORDKEEPING REQUIREMENTS

- (a) Each owner or operator using coatings listed in Table 1 (a) in Condition (1) shall:
- (1) Maintain a current list of coatings in use with category and VOC content as applied.
  - (2) Record coating usage on an annual basis
- (b) Each owner or operator using cleaning solvents required in (B.3)(c) of the CTG shall:
- (1) For aqueous and semiaqueous hand-wipe cleaning solvents, maintain a list of materials used with corresponding water contents.
  - (2) For vapor pressure compliant hand-wipe cleaning solvents:
    - (i) Maintain a current list of cleaning solvents in use with their respective vapor pressures or, for blended solvents, VOC composite vapor pressures.

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- (ii) Record cleaning solvent usage on an annual basis.
- (3) For cleaning solvents with a vapor pressure greater than 45 mm Hg used in exempt hand-wipe cleaning operations:
  - (i) Maintain a list of exempt hand-wipe cleaning processes.
  - (ii) Record cleaning solvent usage on an annual basis.
- (c) Each owner or operator using control equipment under paragraph (B.3)(d) shall record monitoring parameters as specified in the monitoring plan required under (B.3)(d)(2).
- (d) Except for Specialty Coatings, any source that complies with the recordkeeping requirements of the Aerospace NESHAP, 40 CFR 63.752, is deemed to be in compliance with the requirements of this paragraph.

TEST METHODS

- a. Coatings  
For coatings which are not waterborne (water-reducible), determine the VOC content of each formulation (less water and less exempt solvents) as applied using manufacturer's supplied data or Method 24 of 40 CFR part 60, Appendix A. If there is a discrepancy between the manufacturer's formulation data and the results of the Method 24 analysis, compliance shall be based on the results from the Method 24 analysis. For water-borne (water-reducible) coatings, manufacturer's supplied data alone can be used to determine the VOC content of each formulation.
- b. Cleaning solvents.
  - (1) For aqueous and semiaqueous cleaning solvents manufacturers' supplied data shall be used to determine the water content.
  - (2) For hand-wipe cleaning solvents required in paragraph (B.3)(c)(1), manufacturers' supplied data or standard engineering reference texts or other equivalent methods shall be used to determine the vapor pressure or VOC composite vapor pressure for blended cleaning solvents.

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(3) This minor revision is shall expire concurrently with Air Emission License A-453-73-G-A/R.

DONE AND DATED IN AUGUSTA, MAINE THIS 26<sup>th</sup> DAY OF April 2001.

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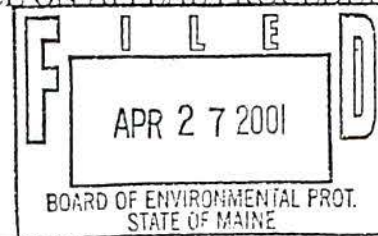
BY: James P. Brooks for  
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 19, 2001

Date of application acceptance: March 19, 2001

Date filed with Board of Environmental Protection: \_\_\_\_\_



This Order prepared by Edwin L. Cousins, BAQ