



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.  
GOVERNOR

EDWARD O. SULLIVAN  
COMMISSIONER

UNITED TECHNOLOGIES	)	DEPARTMENTAL
PRATT & WHITNEY	)	FINDING OF FACT AND ORDER
YORK COUNTY	)	AIR EMISSION LICENSE
NORTH BERWICK, MAINE	)	AMENDMENT #7
A-453-71-O-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 air emission license, A-453-71-N-M, issued April 26, 2001. EPA wants further clarification of the applicability of the Aerospace Control Technique Guideline (CTG) for Pratt & Whitney.

**II. REVISION DESCRIPTION**

Air Emission License Amendment #6, A-453-71-N-M, addresses the applicability of the Aerospace CTG to Pratt & Whitney. USEPA had requested the MEDEP to reference the actual CTG (not just the Federal Register notice) and recommended that the coating VOC content limits and recordkeeping portions, expressed in the CTG, be included in an air emission license amendment. The license amendment issued April 26, 2001 addressed these concerns, however, EPA felt further clarification was necessary. Therefore, this minor revision will update Condition 1 (c) of Amendment A-453-71-N-M to clearly state that Pratt & Whitney must meet VOC content limits for primers and topcoats.

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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-O-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) (c) of Air Emission License Amendment, A-453-71-N-M:

(c) Upon the date of issuance of this license, Pratt & Whitney shall meet the VOC content limits for primers and topcoats stated in 40 CFR Sections 63.745 (c)(2) and (c)(4) and the VOC content limits for chemical milling maskants (Type I/II) stated in 40 CFR Section 63.747 (c)(2). These requirements do not apply if the facility uses 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) The following condition shall replace Condition (3) (a) of Air Emission License Amendment, A-453-71-N-M. This revision will now include recordkeeping for the primers and topcoats mentioned in Condition 1(c). The rest of Condition (3), including sections (b), (c), (d) and the test methods will not change:

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- (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) and paragraph 1 (c) 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
- (4) This minor revision shall expire concurrently with Air Emission License A-453-73-G-A/R.

DONE AND DATED IN AUGUSTA, MAINE THIS 2<sup>ND</sup> DAY OF July 2001.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brooks for 7  
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: June 4, 2001

Date of application acceptance: June 13, 2001

Date filed with Board of Environmental Protection:



This Order prepared by Edwin L. Cousins, BAQ



Pratt and Whitney  
Response to comments

Commentors

US Environmental Protection Agency  
David Conroy

1. The commentor recommends condition 1(c) be changed to read as follows:  
“Upon the date of issuance of this license, Pratt and Whitney shall meet the VOC content limits for primers and topcoats stated in 40 CFR Sections 63.745(c)(2) and (c)(4) and the VOC content limits for chemical milling maskants (Type I/II) stated in 40 CFR Section 63.747(c)(2). These requirements do not apply if the facility uses 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.”

*The Department agrees and has made that change in amendment #7 of the Pratt and Whitney license.*

2. The commentor recommends that the recordkeeping requirements listed in condition 3(a) of the license that currently apply to the coatings listed in Table 1(a) be expanded to also apply to the coatings referenced in the revised condition 1(c).

*The Department agrees and has made that change in amendment #7 of the Pratt and Whitney license.*