



DEPARTMENT ORDER

Tambrands, Inc.
Androscoggin County
Auburn, Maine
A-44-71-T-R/M (SM)

Departmental
Findings of Fact and Order
Air Emission License
Renewal/Amendment

FINDINGS OF FACT

After review of the air emission license renewal and 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

Tambrands, Inc. (Tambrands), a Proctor & Gamble Company, has applied to renew its Air Emission License for the operation of emission sources associated with its paper products manufacturing facility. Tambrands has also requested an amendment to its license in order to make the following changes:

- License Boilers #3 and #4 to fire only Natural Gas;
- Remove Boiler #5; and
- Add process lines.

The equipment addressed in this license is located at 2879 Hotel Road, Auburn, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Fuel Type, % sulfur	Maximum Firing Rate	Date of Manuf.	Date of Install.	Stack #
Boiler #1	6.3	#4 Fuel Oil, 1.0% by weight	42 gal/hr	1967	1970	1
Boiler #2	6.3	#4 Fuel Oil, 1.0% by weight	42 gal/hr	1967	1970	
Boiler #3	6.3	Natural Gas, Negligible sulfur	6117 scf/hr	1973	1974	2
Boiler #4	6.3	Natural Gas, Negligible sulfur	6117 scf/hr	1973	1974	

Note: Boiler #5 has been removed from this license and will not be addressed further.

Generators

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (kW)	Fuel Type, % sulfur	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.	Stack #
Generator #2	6.1	750	Distillate Fuel, 0.0015% by weight	44.5	1990	1990	4
Fire Pump #1	1.8	75	Distillate Fuel, 0.0015% by weight	13	2000	2000	10
Fire Pump #2	1.8	75	Distillate Fuel, 0.0015% by weight	13	2001	2001	11

Process Equipment

Emission Unit	Type of Equipment	Raw Process Capacity	Finished Process Capacity	Date of Manuf.	Date of Inst.	Control Device(s)
79-84	Fiber Processing Lines	1,040 kg/hr	1,020 kg/hr	1999	2000	Fire Dust Filter & Internal venting
85 & 86	Fiber Processing Lines	520 kg/hr	514 kg/hr	1994	2004	Fire Dust Filter & Internal venting
42-50 & 96	Pearl Converting Lines	11,270 gm/min	11,100 gm/min	2002-2006	2002-2006	Fire Dust Filter & Internal venting
61-66	West Wing/Conestoga Converting lines	3220 gm/min	3172 gm/min	2007-2017	2007-2017	Fire Dust Filter & Internal venting

C. Definitions

Distillate Fuel. For the purposes of this license, *distillate fuel* means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;
- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

D. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the issued date of this license.

The application for Tambrands does not include the licensing of increased emissions or the installation of new or modified equipment above minimum licensing thresholds; licensing Boilers #3 and #4 to fire only Natural Gas, removal of Boiler #5, and the addition of insignificant process lines will increase emissions by less than 4 ton/year for each single pollutant and less than 8 ton/year for all pollutants combined. The license is therefore considered to be a renewal of currently licensed emission units and a minor revision and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115. The facility is licensed as follows:

- As a synthetic minor source of air emissions, because the licensed emissions are below the major source thresholds for criteria pollutants; 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.

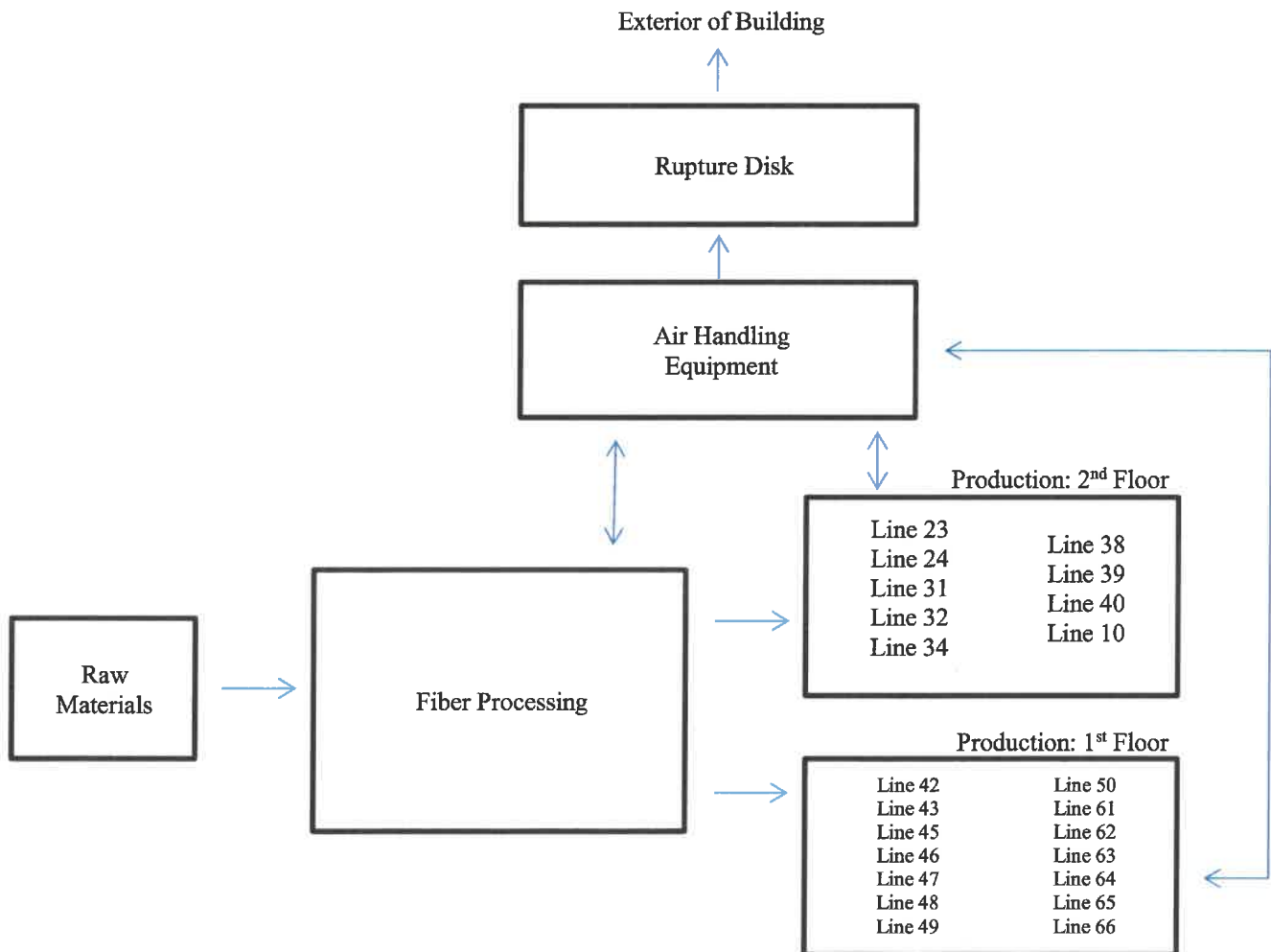
B. Process Description

Tambrands is a leading manufacturer of feminine care products as a Proctor & Gamble company. The manufacture of these products at the facility is comprised of distinct departments: fiber processing and production.

Cotton and rayon fibers in the fiber processing department are blended and formed into webs. These webs are arranged in continuous threads and are then sent to the production

area. In the production area, the prepared fiber is wrapped, compressed, and cut into individual pads (tampons) which then have cords sewn onto them. The tampons, when cut, are then compressed into a bullet shape and are conditioned so that the shape is maintained, and are inserted into application tubes- this step is handled differently depending on the product line being produced. The tampons are then sent through a wrapping process and subsequent packaging and packing processes.

Each step in the process is controlled for PM using air handling equipment throughout the building. Fiber processing is completed in one space on the first floor, and all production steps after fiber processing occur concurrently in 23 separate process lines on two floors. A schematic of this process is presented below:



C. Boilers #1-#4

Tambrands operates Boilers #1-#4 for process steam and building heat.

Boilers #1 and #2 fire #4 fuel oil and exhaust through a shared stack – Stack #1. Both boilers have maximum input capacities of 6.3 MMBtu/hr.

Boilers #3 and #4 have dual-fuel firing capabilities; however, they are only being licensed to fire natural gas. The boilers exhaust through a shared stack – Stack #2 – and each has a maximum input capacity of 6.3 MMBtu/hr.

1. BPT Findings

The BPT emission limits for Boilers #1 and #2 are based on the following:

#4 Fuel Oil

PM/PM ₁₀	0.12 lb/MMBtu from 06-096 C.M.R. ch. 103
SO ₂	1.01 lb/MMBtu based on the combustion of #4 fuel oil with a maximum sulfur content of 1.0% sulfur by weight
NO _x	47 lb/1000 gal from AP-42 Table 1.3-1, dated 05/10
CO	5 lb/1000 gal from AP-42 Table 1.3-1, dated 05/10
VOC	0.76 lb/1000 gal from AP-42 Table 1.3-3, dated 05/10
Visible Emissions	06-096 C.M.R. ch. 115, BPT

The BPT emission limits for Boilers #3 and #4 are based on the following:

Natural Gas

PM/PM ₁₀	0.05 lb/MMBtu from 06-096 C.M.R. ch. 115, BPT
SO ₂	0.6 lb/MMscf from AP-43 Table 1.4-2, dated 07/98
NO _x	100 lb/MMscf from AP-42 Table 1.4-1, dated 07/98

CO	84 lb/MMscf from AP-42 Table 1.4-1, dated 07/98
VOC	5.5 lb/MMscf from AP-42 Table 1.4-2, dated 07/98
Visible Emissions	06-096 C.M.R. ch. 115, BPT

BPT emission limits for the boiler are the following:

Unit	Pollutant	lb/MMBtu
Boiler #1	PM	0.12
Boiler #2	PM	0.12
Boiler #3	PM	0.05
Boiler #4	PM	0.05

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1 #4 fuel oil	0.76	0.76	6.35	1.97	0.21	0.03
Boiler #2 #4 fuel oil	0.76	0.76	6.35	1.97	0.21	0.03
Boiler #3 natural gas	0.32	0.32	Negligible	0.61	0.51	0.03
Boiler #4 natural gas	0.32	0.32	Negligible	0.61	0.51	0.03

Visible emissions from Stack #1 shall not exceed 30% opacity on a six-minute block average basis.

Visible emissions from Stack #2 shall not exceed 10% opacity on a six-minute block average basis.

Tambrands shall be limited to 43,500 MMBtu/yr of fuel input into the boilers on a 12-month rolling total basis based on heating values in the following table:

Fuel	Heating Value	Maximum Equivalent
#4 Fuel Oil	145 MMBtu/ 1000 gal	300,000 gal
Natural Gas	1020 MMBtu/MMscf	42.65 MMscf

Fuel Sulfur Content Requirements

Boilers #1 and #2 are licensed to fire #4 fuel oil, a residual fuel oil. The sulfur content of the #4 fuel oil fired is currently limited to 1% by weight per 06-096 C.M.R. ch. 115, BPT. Per 38 M.R.S. § 603-A(2)(A)(1) and (2), as of July 1, 2018, no person shall import, distribute, or offer for sale any residual fuel oil with a sulfur content greater than 0.5% by weight. Therefore, beginning July 1, 2018, the #4 fuel oil purchased or otherwise obtained for use in Boilers #1 and #2 shall not exceed 0.5% by weight.

2. Periodic Monitoring

Periodic monitoring for each of the boilers shall include recordkeeping to document fuel use both on a monthly and 12-month rolling total basis. Documentation shall include the type of fuel used and sulfur content of the fuel, if applicable.

3. New Source Performance Standards (NSPS): 40 C.F.R. Part 60, Subpart Dc

Due to the sizes of the boilers, they are all not subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr manufactured after June 9, 1989. [40 C.F.R. § 60.40c]

4. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJ

Boilers #3 and #4

Boilers #3 and #4 both fire only gaseous fuel and are therefore not subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ. [40 C.F.R. §§63.11193 and 63.11195]

Gas-fired boilers are exempt from 40 C.F.R. Part 63, Subpart JJJJJ. However, boilers which fire fuel oil are not. A “gas-fired boiler” is defined as any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year. [40 C.F.R. § 63.11237]

Any boiler designed to burn fuels besides gaseous fuels prior to June 4, 2010, will be considered an existing boiler under this rule. A boiler which currently fires gaseous fuels, but converts back to firing another fuel (such as distillate fuel) in the future would become subject as an existing boiler at the time it is converted back to oil.

Boilers #1 and #2

Boilers #1 and #2 are both subject to 40 C.F.R. Part 63, Subpart JJJJJ. The units are considered existing oil boilers rated less than 10 MMBtu/hr. [40 C.F.R. §§ 63.11193 and 63.11195]

A summary of the currently applicable federal 40 C.F.R. Part 63, Subpart JJJJJ requirements is listed below. At this time, the Department has not taken delegation of this area source rule promulgated by EPA; however, Tambrands is still subject to the requirements. Notification forms and additional rule information can be found on the following website: <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

a. Compliance Dates, Notifications, and Work Practice Requirements

(1) Initial Notification of Compliance

An Initial Notification submittal to EPA was due no later than January 20, 2014. [40 C.F.R. § 63.11225(a)(2)]

Tambrands submitted their Initial Notification to EPA on September 8, 2011.

(2) Boiler Tune-Up Program

(i) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]

(ii) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. Because Boilers #1 and #2 are both existing oil-fired boilers rated higher than 5 MMBtu/hr, they are required to be tuned up every two years.
[40 C.F.R. § 63.11223(a) and Table 2]

(iii) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]
2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]

3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]
6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 C.F.R. § 63.11223(b)(7)]

(iv) Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:

1. The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
2. A description of any corrective actions taken as part of the tune-up of the boiler; and
3. The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

(v) After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 C.F.R. § 63.11225(a)(4) and 40 C.F.R. § 63.11214(b)]

Tambrands submitted their Notification of Compliance Status to EPA on April 19, 2012.

(3) Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

- (i) Company name and address;
- (ii) A statement of whether the source has complied with all the relevant requirements of this Subpart;
- (iii) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
- (iv) The following certifications, as applicable:
 1. "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
 2. "No secondary materials that are solid waste were combusted in any affected unit."
 3. "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJ including the following [40 C.F.R. § 63.11225(c)]:

- (1) Copies of notifications and reports with supporting compliance documentation;
- (2) Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
- (3) Records of the occurrence and duration of each malfunction of each applicable boiler; and
- (4) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

D. Generator #2 and Fire Pumps #1 & #2

Tambrands operates one emergency generator, Generator #2. The emergency generator is a generator set consisting of an engine and an electrical generator. Generator #2 has an engine rated at 6.1 MMBtu/hr, fires distillate fuel, and was manufactured in 1990.

Tambrands also operates two fire pumps, Fire Pumps #1 & #2. The fire pumps have engines, each rated at 1.8 MMBtu/hr, that fire distillate fuel. The fire pumps were manufactured in 2000 and 2001, respectively.

1. BPT Findings

The BPT emission limits for the engines are based on the following:

<u>Distillate Fuel</u>	
PM/PM ₁₀	0.12 lb/MMBtu for Generator #2 from 06-096 C.M.R. ch. 103
	0.31 lb/MMBtu for Fire Pumps #1 & #2 From AP-42 Table 3.3-1, dated 10/96
SO ₂	0.0015 lb/MMBtu based on the combustion of distillate fuel with a maximum sulfur content of 0.0015% sulfur by weight
NO _x	3.2 lb/MMBtu for Generator #2 from AP-42 Table 3.4-1, dated 10/96
	4.41 lb/MMBtu for Fire Pumps #1 & #2 from AP-42 Table 3.3-1, dated 10/96
CO	0.85 lb/MMBtu for Generator #2 from AP-42 Table 3.4-1, dated 10/96
	0.95 lb/MMBtu for Fire Pumps #1 & #2 from AP-42 Table 3.3-1, dated 10/96
VOC	0.09 lb/MMBtu for Generator #2 from AP-42 Table 3.4-1, dated 10/96
	0.36 lb/MMBtu for Fire Pumps #1 & #2 from AP-42 Table 3.3-1, dated 10/96
Visible Emissions	06-096 C.M.R. ch. 115, BPT

The BPT emission limits for the engines are the following:

Unit	Pollutant	lb/MMBtu
Generator #2	PM	0.12

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #2 (6.1 MMBtu/hr) distillate fuel	0.73	0.73	0.01	19.52	5.19	0.55
Fire Pump #1 (1.8 MMBtu/hr) distillate fuel	0.56	0.56	Negligible	7.94	1.71	0.65
Fire Pump #2 (1.8 MMBtu/hr) distillate fuel	0.56	0.56	Negligible	7.94	1.71	0.65

Visible emissions from Generator #2, Fire Pump #1, and Fire Pump #2 shall each not exceed 20% opacity on a six-minute block average basis.

2. New Source Performance Standards (NSPS)

Due to the dates of manufacture of the compression ignition emergency engines listed above (Generator #2 and Fire Pumps #1 & #2), the engines are not subject to the New Source Performance Standards (NSPS) *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE)*, 40 C.F.R. Part 60, Subpart III since the units were manufactured prior to April 1, 2006. [40 C.F.R. § 60.4200]

3. National Emission Standards for Hazardous Air Pollutants (NESHAP):
 40 C.F.R. Part 63, Subpart ZZZZ

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63, Subpart ZZZZ is applicable to Generator #2 and Fire Pumps #1 & #2. The units are considered existing, emergency stationary reciprocating internal combustion engines at an area HAP source and are not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE*) specifically does not exempt these units from the federal requirements. [40 C.F.R. § 63.6585]

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 63, Subpart ZZZZ, a stationary reciprocating internal combustion engine (RICE) is considered an **emergency** stationary RICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under

40 C.F.R. Part 63, Subpart ZZZZ, resulting in the engine being subject to requirements applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster or equipment failure;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for Maintenance Checks, Readiness Testing, and other non-emergency situations as described below.

- (i) An emergency engine may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE more than 100 hours per calendar year.
- (ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

Generator #2 and Fire Pumps #1 & #2 shall be limited to the usage outlined in 40 C.F.R. § 63.6640(f) and therefore may be classified as existing emergency stationary RICE as defined in 40 C.F.R. Part 63, Subpart ZZZZ. Failure to comply with all of the requirements listed in 40 C.F.R. § 63.6640(f) may cause these engines to not be considered emergency engines and therefore subject to all applicable requirements for non-emergency engines.

b. 40 C.F.R. Part 63, Subpart ZZZZ Requirements

(1) Operation and Maintenance Requirements

	<u>Operating Limitations</u>
Compression ignition (distillate fuel) units: Generator #2 Fire Pump #1 Fire Pump #2	<ul style="list-style-type: none">- Change oil and filter every 500 hours of operation or annually, whichever comes first;- Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or Tambrands shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practice for minimizing emissions.

[40 C.F.R. § 63.6625(e)]

(2) Optional Oil Analysis Program

Tambrands has the option of utilizing an oil analysis program which complies with the requirements of § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, Tambrands must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for each engine. The analysis program must be part of the maintenance plan for each engine. [40 C.F.R. § 63.6625(i)]

(3) Non-Resettable Hour Meter Requirement

A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 63.6625(f)]

(4) Startup Idle and Startup Time Minimization Requirements

During periods of startup the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

[40 C.F.R. § 63.6625(h) and 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(5) Annual Time Limit for Maintenance and Testing

As emergency engines, the units shall each be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity).

[40 C.F.R. § 63.6640(f)]

(6) Recordkeeping

Tambrands shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, including what classified the operation as emergency, and the number of hours the unit operated for non-emergency purposes. [40 C.F.R. § 63.6655(f)]

E. Process Equipment

1. Air Handling System

Particulate matter generated from Tambrands' manufacturing process is controlled using an air handling system. Internal air in the facility is cycled through the air handling system where particulate emissions are filtered through a fine dust filter and collected. Filtered air is then vented back into the facility. Because the filtered air is vented internally, fugitive process emissions are controlled, and PM emissions are considered insignificant via the following exemption:

06-096 C.M.R. ch. 115, Appendix B § A(58)) - *Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, sintering or polishing; Ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including cotton roll grinding and groundwood pulping stone sharpening provided that:*

- a. *Activity is performed indoors; and*
- b. *No fugitive particulate emissions enter the environment.*

2. VOC and HAP emissions

Process emissions of VOC and HAP at Tambrands are from the use of glues as a binder within the manufacturing process; methylethylketone (MEK)-based inks to label wraps, cartons and shipping boxes; and fragrances which are added to the product during processing.

Based on the use of these VOC/HAP containing materials, Tambrands shall be limited to the following emissions on a 12-month rolling total basis:

- 24.0 Tons of VOC
- 6.0 Tons of total HAP

Tambrands shall demonstrate compliance by documenting VOC and HAP emissions from the process on a monthly and 12-month rolling total basis. Monthly values of VOC and HAP emissions for compliance demonstration shall be calculated using the following method for each material, or by using another method, as approved by the Department:

$$\text{Monthly Emissions} = (A - B) * X$$

Where,

- A* = Amount of applicable material purchased during the month
- B* = Amount of applicable material shipped offsite during the month
- X* = VOC or HAP content, as appropriate, of the applicable material.

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

F. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis.

G. Annual Emissions

1. Total Annual Emissions

Tambrands shall be restricted to the following annual emissions on a 12-month rolling total basis. The tons per year limits were calculated based on a fuel input limit in the boilers of 43,500 MMBtu/yr, assuming a worst case scenario for fuel use, and 100 hours of operation each of Generator #2 and Fire Pumps #1 and #2.

Total Licensed Annual Emissions for the Facility
Tons/year
 (used to calculate the annual license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	Total HAP
Boilers	2.61	2.61	21.91	7.05	1.79	0.12	--
Generator #2	0.04	0.04	--	1.0	0.3	0.03	--
Fire Pump #1	0.03	0.03	--	0.4	0.1	0.03	--
Fire Pump #2	0.03	0.03	--	0.4	0.1	0.03	--
Process Emissions	--	--	--	--	--	24.0	6.0
Total TPY	2.7	2.7	21.9	8.9	2.3	24.2	6.0

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans*, 40 C.F.R. Part 52, Subpart A, § 52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 C.M.R. ch. 100, are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

The quantity of CO₂e emissions from this facility is less than 100,000 tons per year, based on the following:

- the facility's fuel use limits;
- worst case emission factors from the following sources: U.S. EPA's AP-42, the Intergovernmental Panel on Climate Change (IPCC), and *Mandatory Greenhouse Gas Reporting*, 40 C.F.R. Part 98; and
- global warming potentials contained in 40 C.F.R. Part 98.

No additional licensing actions to address GHG emissions are required at this time.

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
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.

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-44-71-T-R/M 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 commencing 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]
- (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 such test results, 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 Part 70 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]

SPECIFIC CONDITIONS

(16) **Boilers #1-#4**

A. Fuel

1. Boilers #3 and #4 shall only fire natural gas. [06-096 C.M.R. ch. 115, BPT]
2. Total fuel use for the boilers shall not exceed an input of 43,500 MMBtu/yr on a 12-month rolling total basis, assuming the following heating values for natural gas and #4 fuel oil:

Fuel	Heating Value	Maximum Equivalent
#4 Fuel Oil	145 MMBtu/ 1000 gal	300,000 gal
Natural Gas	1020 MMBtu/MMscf	42.65 MMscf

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

3. Prior to July 1, 2018, the facility shall fire #4 fuel oil with a maximum sulfur content not to exceed 1.0% by weight. [06-096 C.M.R. ch. 115, BPT]
4. Beginning July 1, 2018, the facility shall not purchase or otherwise obtain #4 fuel oil with a maximum sulfur content that exceeds 0.5% by weight. [06-096 C.M.R. ch. 115, BPT]
5. Compliance with the fuel requirements shall be demonstrated by fuel records from the supplier showing the quantity, type, and the percent sulfur of the fuel

delivered (if applicable). Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.12	06-096 C.M.R. ch. 103 § (2)(B)(1)(a)
Boiler #2	PM	0.12	06-096 C.M.R. ch. 103 § (2)(B)(1)(a)
Boiler #3	PM	0.05	06-096 C.M.R. ch. 115, BPT
Boiler #4	PM	0.05	06-096 C.M.R. ch. 115, BPT

C. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1 #4 fuel oil	0.76	0.76	6.35	1.97	0.21	0.03
Boiler #2 #4 fuel oil	0.76	0.76	6.35	1.97	0.21	0.03
Boiler #3 natural gas	0.32	0.32	NA	0.61	0.51	0.03
Boiler #4 natural gas	0.32	0.32	NA	0.61	0.51	0.03

D. Visible Emissions

1. Visible emissions from Stack #1, serving Boilers #1 and #2, shall not exceed 30% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]
2. Visible emissions from Stack #2, serving Boilers #3 and #4, shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

E. Boiler MACT (40 C.F.R. Part 63, Subpart JJJJJ) Requirements for Boilers #1 and #2 [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]
 - a. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. Because Boilers #1 and #2 are existing oil-fired boilers rated higher than 5 MMBtu/hr, they are required to be tuned up every two years.
 [40 C.F.R. § 63.11223(a) and Table 2]

- b. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
- (1) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]
 - (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]
 - (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]
 - (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
 - (5) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
[40 C.F.R. § 63.11223(b)(5)]
 - (6) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up.
[40 C.F.R. § 63.11223(b)(7)]
- c. Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:
- (1) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
 - (2) A description of any corrective actions taken as part of the tune-up of the boiler; and
 - (3) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

2. Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years. The report shall be maintained by the source and submitted to the Department and to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

- a. Company name and address;
- b. A statement of whether the source has complied with all the relevant requirements of this Subpart;
- c. A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
- d. The following certifications, as applicable:
 - (1) "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
 - (2) "No secondary materials that are solid waste were combusted in any affected unit."
 - (3) "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

3. Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJ including the following [40 C.F.R. § 63.11225(c)]:
 - a. Copies of notifications and reports with supporting compliance documentation;
 - b. Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
 - c. Records of the occurrence and duration of each malfunction of each applicable boiler; and
 - d. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

(17) **Generator #2 and Fire Pumps #1 & #2**

A. Generator #2 and the fire pumps shall be limited to 100 hours of operation, each, per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 115, BPT]

B. The fuel sulfur content for Generator #2 and the fire pumps shall be limited to 0.0015% sulfur by weight. Compliance shall be demonstrated by fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 C.M.R. ch. 115, BPT]

C. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
Generator #2	PM	0.12	06-096 C.M.R. ch. 103 § (2)(B)(1)(a)

D. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #2 (6.1 MMBtu/hr) distillate fuel	0.73	0.73	0.01	19.52	5.19*	0.55
Fire Pump #1 (1.8 MMBtu/hr) distillate fuel	0.56	0.56	NA	7.94	1.71	0.65
Fire Pump #2 (1.8 MMBtu/hr) distillate fuel	0.56	0.56	NA	7.94	1.71	0.65

E. Visible Emissions

1. Visible emissions from Generator #2 shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

2. Visible emissions from each of the fire pumps shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

F. Generator #2 and Fire Pumps #1 & #2 all shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following:

1. Tambrands shall meet the following operational limitations for each of the compression ignition emergency engines:
 - a. Change the oil and filter annually,
 - b. Inspect the air cleaner annually and replace as necessary, and
 - c. Inspect the hoses and belts annually and replace as necessary.

Records shall be maintained documenting compliance with the operational limitations.

[40 C.F.R. § 63.6603(a) and Table 2(d); and 06-096 C.M.R. ch. 115, BPT]

2. Oil Analysis Program Option

Tambrands has the option of utilizing an oil analysis program which complies with the requirements of § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, Tambrands must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for each engine. The analysis program must be part of the maintenance plan for each engine. [40 C.F.R. § 63.6625(i)]

3. Non-Resettable Hour Meter

A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 63.6625(f)]

4. Maintenance, Testing, and Non-Emergency Operating Situations

- a. As emergency engines, the units shall each be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise to supply power as part of a financial arrangement with another entity unless the conditions in § 63.6640(f)(4)(ii) are met. These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written logs) of all engine operating hours. [40 C.F.R. § 63.6640(f) and 06-096 C.M.R. ch. 115, BPT]

- b. Tambrands shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, including what classified the operation as emergency, and the number of hours each unit operated for non-emergency purposes. [40 C.F.R. §§ 63.6655(e) and (f)]

5. Operation and Maintenance

The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or Tambrands shall develop a maintenance plan which provides to the extent practicable for the maintenance and operation of each engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

6. Startup Idle and Startup Time Minimization

During periods of startup, the facility must minimize each engine's time spent at idle and minimize each engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) & 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(18) **Process Equipment**

- A. VOC emissions from Tambrands' manufacturing processes shall not exceed 24.0 tons/year on a 12-month rolling total basis.
- B. HAP emissions from Tambrands' manufacturing processes shall not exceed 6.0 tons/year on a 12-month rolling total basis.
- C. Tambrands shall demonstrate compliance by documenting VOC and HAP emissions from the process on a monthly and 12-month rolling total basis.

Monthly values of VOC and HAP emissions for compliance demonstration shall be calculated using the following method for each material, or by using another method, as approved by the Department:

$$\text{Monthly Emissions} = (A - B) * X$$

Where,

- A* = Amount of applicable material purchased during the month
- B* = Amount of applicable material shipped offsite during the month
- X* = VOC or HAP content, as appropriate of the applicable material.

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

(19) **General Process Sources**

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

Tambrands, Inc.
Androscoggin County
Auburn, Maine
A-44-71-T-R/M (SM)

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Departmental
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Renewal/Amendment

- (20) Tambrands 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).

DONE AND DATED IN AUGUSTA, MAINE THIS 25 DAY OF September, 2017.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Cona for
PAUL MERCER, 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: 09/09/2016

Date of application acceptance: 09/09/2016

Date filed with the Board of Environmental Protection:

This Order prepared by Colby Fortier-Brown, Bureau of Air Quality.

