



DEPARTMENT ORDER

**City of Westbrook
Westbrook School Department
Cumberland County
Westbrook, Maine
A-114-71-H-R/A (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Renewal / Minor Revision**

FINDINGS OF FACT

After review of the air emission license 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

The City of Westbrook (Westbrook School Department) has applied to renew its Air Emission License for the operation of emission sources associated with the school system. The Westbrook School Department has also requested an amendment to its license to remove a boiler, PrC1, and to include two boilers which have not previously been licensed, WMS1 and WMS2.

The equipment addressed in this license is located within the school system at Westbrook Regional Vocational Center, Canal School, Saccarappa Elementary School, Westbrook Middle School, Congin Elementary School, Westbrook High School, and the Westbrook School Department's Superintendent's office. The Superintendent's office is located at 117 Stroudwater Street, Westbrook, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type, % sulfur	Date of Manuf.	Date of Install.
WHS1 High School	1.5	1471 scf/hr	Natural Gas, Negligible Sulfur	2010	2010
WHS2 High School	1.5	1471 scf/hr	Natural Gas, Negligible Sulfur	2010	2010
WHS3 High School	1.5	1471 scf/hr	Natural Gas, Negligible Sulfur	2010	2010

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type, % sulfur	Date of Manuf.	Date of Install.
WHS4 High School	1.5	1471 scf/hr	Natural Gas, Negligible Sulfur	2010	2010
VOC1 Vocational Center	8.3	8137 scf/hr	Natural Gas, Negligible Sulfur	2008	2008
CNL1 Canal School	2.8	2745 scf/hr	Natural Gas, Negligible Sulfur	2000	2000
CNL2 Canal School	2.5	2451 scf/hr ----- 17.9 gal/hr	Natural Gas, Negligible Sulfur Distillate Fuel, 0.5% by weight	1998	1998
SUP1 Superintendent's office	1.3	9.3 gal/hr	Distillate Fuel, 0.5% by weight	1974	1974
SES1 Saccarappa Elementary School	1.3	1275 scf/hr ----- 9.3 gal/hr	Natural Gas, Negligible Sulfur Distillate Fuel, 0.5% by weight	2011	2011
SES2 Saccarappa Elementary School	1.3	1275 scf/hr ----- 9.3 gal/hr	Natural Gas, Negligible Sulfur Distillate Fuel, 0.5% by weight	2011	2011
CES1 Congin Elementary School	5.9	5784 scf/hr	Natural Gas, Negligible Sulfur	2003	2003
WMS1 Middle School	1.5	1471 scf/hr	Natural Gas, Negligible Sulfur	2009	2009
WMS2 Middle School	1.5	1471 scf/hr	Natural Gas, Negligible Sulfur	2009	2009

Generators

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (kW)	Fuel Type, % sulfur	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.
VOC2 Vocational Center	2.2	200	Distillate Fuel, 0.0015% by weight	16	2001	2001
CNL3 Canal School	1.1	100	Distillate Fuel, 0.0015% by weight	8	2002	2002
WMS3 Middle School	3.0	275	Distillate Fuel, 0.0015% by weight	22	2010	2010
CES2 Congin Elementary School	1.1	100	Distillate Fuel, 0.0015% by weight	8	2005	2005

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 Westbrook School Department includes the licensing the installation of new equipment, the removal of a boiler, and an adjustment of emission factors to be consistent with boiler classifications. Therefore, the license is considered to be a renewal of currently licensed emission units and a modification 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 modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the “Significant Emission” levels as defined in the Department’s *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100. The emission increases are determined by subtracting the current licensed annual emissions preceding the modification from the maximum future licensed annual emissions, as follows:

<u>Pollutant</u>	<u>Current License (TPY)</u>	<u>Future License (TPY)</u>	<u>Net Change (TPY)</u>	<u>Significant Emission Levels</u>
PM	9.07	8.1	- 0.97	100
PM ₁₀	9.07	8.1	- 0.97	100
SO ₂	21.38	14.1	- 7.28	100
NO _x	24.08	16.8	- 7.28	100
CO	10.10	11.8	+1.7	100
VOC	1.38	0.9	- 0.48	50

This modification is determined to be a minor modification and has been processed as such.

With the annual operating hours restriction on the emergency generators, the facility is licensed below the major source thresholds for criteria pollutants and is considered a synthetic minor. The facility is also licensed below the major source thresholds for hazardous air pollutants (HAP) and is considered an area source of 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. Boilers

Westbrook School Department operates thirteen boilers above minimum licensing thresholds for heat and hot water needs at its schools and at the Superintendent's office. The boilers, as detailed in the Emission Equipment section of this license, will be included together in this section; however, they will be separated by facility in the Order.

1. BPT Findings

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

Distillate Fuel

PM/PM ₁₀	0.08 lb/MMBtu 06-096 C.M.R. ch. 115, BPT
SO ₂	0.5 lb/MMBtu based on the combustion of distillate fuel with a maximum sulfur content of 0.5% sulfur by weight
NO _x	20 lb/1000 gal from AP-42 Table 1.3-1, dated 5/10
CO	5 lb/1000 gal from AP-42 Table 1.3-1, dated 5/10
VOC	0.34 lb/1000 gal from AP-42 Table 1.3-3, dated 5/10
Visible Emissions	06-096 C.M.R. ch. 115, BPT

Natural Gas

PM/PM ₁₀	0.05 lb/MMBtu 06-096 C.M.R. ch. 115, BPT
SO ₂	0.6 lb/MMscf from AP-42, Table 1.4-2, dated 7/98
NO _x	100 lb/MMscf from AP-42, Table 1.4-1, dated 7/98
CO	84 lb/MMscf from AP-42, Table 1.4-1, dated 7/98
VOC	5.5 lb/MMscf from AP-42, Table 1.4-2, dated 7/98
Visible Emissions	06-096 C.M.R. ch. 115, BPT

The BPT emission limits for the boilers are the following:

Unit	Pollutant	lb/MMBtu
VOC1	PM	0.05
CES1	PM	0.05

Unit	Fuel	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
WHS1 High School	Natural gas	0.08	0.08	NA ¹	0.15	0.12	0.01
WHS2 High School	Natural gas	0.08	0.08	NA	0.15	0.12	0.01
WHS3 High School	Natural gas	0.08	0.08	NA	0.15	0.12	0.01
WHS4 High School	Natural gas	0.08	0.08	NA	0.15	0.12	0.01
VOC1 Vocational Center	Natural gas	0.42	0.42	NA	0.81	0.68	0.04
CNL1 Canal School	Natural gas	0.14	0.14	NA	0.27	0.23	0.02

¹ NA = No Applicable Limit

Unit	Fuel	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
CNL2 Canal School	Natural gas	0.13	0.13	NA	0.25	0.21	0.01
	Distillate fuel	0.20	0.20	1.25	0.36	0.09	0.01
SUP1 Superintendent's office	Distillate fuel	0.10	0.10	0.65	0.19	0.05	NA
SES1 Saccarappa Elementary School	Natural gas	0.07	0.07	NA	0.13	0.11	0.01
	Distillate fuel	0.10	0.10	0.65	0.19	0.05	NA
SES2 Saccarappa Elementary School	Natural gas	0.07	0.07	NA	0.13	0.11	0.01
	Distillate fuel	0.10	0.10	0.65	0.19	0.05	NA
CES1 Congin Elementary School	Natural gas	0.30	0.30	NA	0.58	0.49	0.03
WMS1 Middle School	Natural gas	0.08	0.08	NA	0.15	0.12	0.01
WMS2 Middle School	Natural gas	0.08	0.08	NA	0.15	0.12	0.01

Visible Emissions

Visible emissions from each of the boilers shall not exceed 20% opacity on a six-minute block average basis when firing distillate fuel.

Visible emissions from each of the boilers shall not exceed 10% opacity on a six-minute block average basis when firing natural gas.

Fuel Sulfur Content Requirements

CNL2, SUP1, SES1, and SES2 are all licensed to fire distillate fuel which, by definition, has a sulfur content of 0.5% or less by weight. Per 38 M.R.S. § 603-A(2)(A)(3), as of July 1, 2018, no person shall import, distribute, or offer for sale any distillate fuel with a sulfur content greater than 0.0015% by weight (15 ppm). Therefore, beginning July 1, 2018, the distillate fuel purchased or otherwise obtained for use in those boilers shall not exceed 0.0015% by weight (15 ppm).

2. Periodic Monitoring

Periodic monitoring for each of the boilers licensed to fire distillate fuel shall include recordkeeping to document fuel use both on a monthly and calendar year total basis. Documentation shall include the type of fuel used and sulfur content of the fuel.

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

Due to their sizes, none of the boilers are 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

None of the boilers are 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. The following table lists the exemptions for each boiler:

Boiler(s)	Exemption	Citation
VOC1, CNL1, CNL2, CES1, WMS1, WMS2	gas-fired boilers	§ 63.11195(e)
SUP1	hot water heater	§ 63.11195(f)
WHS1-4, SES1, SES2	gas-fired boilers and hot water heaters	§ 63.11195(e) and (f)

Dual-Fuel Boilers Exempt Only as Gas-Fired Boilers (CNL2):

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.

C. Generators

Westbrook School Department operates four emergency generators rated above minimum licensing thresholds at its schools. The generators, which are generator sets, each consisting of an engine and an electrical generator, are detailed in the Emission Equipment section of this license. They will be included together in this section; however, they will be separated by school in the Order.

1. BPT Findings

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

Distillate Fuel

PM/PM ₁₀	0.12 lb/MMBtu 06-096 C.M.R. ch. 115, BPT <u>For WMS3</u>
	0.31 lb/MMBtu From AP-42 Table 3.1-1, dated 10/96 <u>For all other generators</u>
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	4.41 lb/MMBtu From AP-42 Table 3.1-1, dated 10/96
CO	0.95 lb/MMBtu From AP-42 Table 3.1-1, dated 10/96
VOC	0.36 lb/MMBtu From AP-42 Table 3.1-1, dated 10/96
Visible Emissions	06-096 C.M.R. ch. 115, BPT

The BPT emission limits for the generators are the following:

Unit	Pollutant	lb/MMBtu
WMS3	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)
VOC2 2.2 MMBtu/hr Distillate fuel	0.68	0.68	NA ²	9.70	2.09	0.79
CNL3 1.1 MMBtu/hr Distillate fuel	0.34	0.34	NA	4.85	1.05	0.40
WMS3 3.0 MMBtu/hr Distillate fuel	0.36	0.36	NA	13.23	2.85	1.08
CES2 1.1 MMBtu/hr Distillate fuel	0.34	0.34	NA	4.85	1.05	0.40

Visible Emissions

Visible emissions from each of the emergency generators shall not exceed 20% opacity on a six-minute block average basis.

2. National Emission Standards for Hazardous Air Pollutants (NESHAP):

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63, Subpart ZZZZ is not applicable to any of the emergency generators operated by the Westbrook School Department. The units are considered existing, emergency stationary reciprocating internal combustion engines at an area HAP source, but they are considered exempt from the requirements of 40 C.F.R. Part 63, Subpart ZZZZ since they are categorized as institutional emergency engines and they do not operate or are not contractually obligated to be available in a demand response program, during a period of deviation from standard voltage or frequency, or for supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in 40 C.F.R. § 63.6640(f)(4)(ii).

Operation of any emergency engine in a demand response program, during a period of deviation from standard voltage or frequency, or for supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in 40 C.F.R. § 63.6640(f)(4)(ii), would cause the engine to be subject to 40 C.F.R. Part 63, Subpart ZZZZ and require compliance with all applicable requirements.

² NA = No Applicable Limit

3. New Source Performance Standards (NSPS)

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 is applicable to WMS3 as the unit was ordered after July 11, 2005, and manufactured after April 1, 2006. Due to the dates of manufacture of the other emergency engines, however, none are subject to 40 C.F.R Part 60, Subpart III. [40 C.F.R. § 60.4200]

A summary of the currently applicable federal 40 C.F.R. Part 60, Subpart III requirements is listed below for WMS3. At this time, the Department has not taken delegation of this federal rule promulgated by EPA; however, Westbrook School Department is still subject to the requirements.

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 60, Subpart III, a stationary reciprocating internal combustion engine (ICE) is considered an **emergency** stationary ICE (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 60, Subpart III, 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.

- (a) 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 ICE more than 100 hours per calendar year.
- (b) 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, 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. §§ 60.4211(f) and 60.4219]

b. 40 C.F.R. Part 60, Subpart IIII Requirements

(1) Manufacturer Certification Requirement

The engine shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in 40 C.F.R. § 60.4202. [40 C.F.R. § 60.4205(b)]

(2) Ultra-Low Sulfur Fuel Requirement

The fuel fired in the engine shall not exceed 15 ppm sulfur (0.0015% sulfur), except that any existing fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted.

[40 C.F.R. § 60.4207(b)]

(3) Non-Resettable Hour Meter Requirement

A non-resettable hour meter shall be installed and operated on the engine.

[40 C.F.R. § 60.4209(a)]

(4) **Operation and Maintenance Requirements**

The engine shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by the Westbrook School Department that are approved by the engine manufacturer. The Westbrook School Department may only change those emission-related settings that are permitted by the manufacturer. [40 C.F.R. § 60.4211(a)]

(5) **Annual Time Limit for Maintenance and Testing**

As an emergency engine, the unit shall 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, 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. § 60.4211(f)]

(6) **Initial Notification Requirement**

No initial notification is required under 40 C.F.R. Part 60, Subpart IIII for emergency engines. [40 C.F.R. § 60.4214(b)]

(7) **Recordkeeping**

The Westbrook School Department shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 60.4214(b)]

4. **Additional BPT Requirements for VOC2, CNL3, and CES2**

Each of the emergency generators shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. There is no limit on emergency operation. Each emergency generator shall be equipped with a non-resettable hour-meter to record operating time. To demonstrate compliance with the operating hours limit, Westbrook School Department shall keep records of the total hours of operation and the hours of emergency operation for each unit.

Emergency generators are only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. Emergency generators are not to be used for prime power when reliable offsite power is available; nor to operate or to be contractually obligated to be available in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity.

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

D. Parts Washer

The Westbrook School Department utilizes a parts washer at the Westbrook Regional Vocational Center. The parts washer contains TEKUSOLV II as its solvent, which has a VOC content above 5%, and is therefore subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130; records shall be kept documenting compliance. Order conditions for this unit will be included in the Westbrook Regional Vocational Center Specific Condition.

E. Annual Emissions

1. Total Annual Emissions

The Westbrook School Department shall be restricted to the following annual emissions on a calendar year total basis. The tons per year limits were calculated based on 100 hours of operation per year of the generators and 8,760 hours of operation per year of the boilers, assuming a worst-case scenario for dual-fuel units:

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

	<u>PM</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>NO_x</u>	<u>CO</u>	<u>VOC</u>
WHS1	0.33	0.33	--	0.64	0.54	0.04
WHS2	0.33	0.33	--	0.64	0.54	0.04
WHS3	0.33	0.33	--	0.64	0.54	0.04
WHS4	0.33	0.33	--	0.64	0.54	0.04
VOC1	1.82	1.82	0.02	3.56	2.99	0.20
CNL1	0.61	0.61	0.01	1.20	1.01	0.07
CNL2	0.88	0.88	5.48	1.57	0.90	0.06
SUP1	0.46	0.46	2.85	0.81	0.20	0.01
SES1	0.46	0.46	2.85	0.81	0.47	0.03
SES2	0.46	0.46	2.85	0.81	0.47	0.03
CES1	1.29	1.29	0.02	2.53	2.13	0.14
VOC2	0.03	0.03	--	0.49	0.10	0.04
CNL3	0.02	0.02	--	0.24	0.05	0.02
WMS1	0.33	0.33	--	0.64	0.54	0.04
WMS2	0.33	0.33	--	0.64	0.54	0.04
WMS3	0.02	0.02	--	0.66	0.14	0.05
CES2	0.02	0.02	--	0.24	0.05	0.02
Total TPY	8.1	8.1	14.1	16.8	11.8	0.9

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:

- 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-114-71-H-R/A 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) Canal School

A. Boilers (CNL1, CNL2)

1. Fuel

- a. CNL1 shall only fire natural gas. [06-096 C.M.R. ch. 115, BPT]
- b. Only natural gas or distillate fuel shall be fired in CNL2. [06-096 C.M.R. ch. 115, BPT]
- c. Prior to July 1, 2018, distillate fuel fired in CNL1 shall have a maximum sulfur content not to exceed 0.5% by weight. [06-096 C.M.R. ch. 115, BPT]
- d. Beginning July 1, 2018, the Westbrook School Department shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [06-096 C.M.R. ch. 115, BPT]
- e. Compliance with the fuel requirements for CNL2 shall be demonstrated by fuel records from the supplier showing type and percent sulfur of the fuel delivered (if applicable). [06-096 C.M.R. ch. 115, BPT]

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

Emission Unit	Fuel	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
CNL1	Natural Gas	0.14	0.14	--	0.27	0.23	0.02
CNL2	Natural Gas	0.13	0.13	--	0.25	0.21	0.01
	Distillate Fuel	0.20	0.20	1.25	0.36	0.09	0.01

3. Visible Emissions

- a. Visible emissions from CNL1 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]
- b. Visible emissions from CNL2 shall not exceed 10% opacity on a six-minute block average basis when firing natural gas or 20% opacity on a six-minute block average basis when firing distillate fuel. [06-096 C.M.R. ch. 115, BPT]

B. Generator (CNL3)

1. CNL3 shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 115, BPT]
2. The Westbrook School Department shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, the number of hours each unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [06-096 C.M.R. ch. 115, BPT]
3. The fuel sulfur content for CNL3 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]
4. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
CNL3 1.1 MMBtu/hr distillate fuel	0.34	0.34	--	4.85	1.05	0.40

5. Visible emissions from CNL3 shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]
6. CNL3 is only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. CNL3 is not to be used for prime power when reliable offsite power is available; nor to operate or to be contractually obligated to be available in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity.

(17) **Saccarappa Elementary School**

A. Boilers (SES1, SES2)

1. Fuel

- a. Only natural gas or distillate fuel shall be fired in SES1 and SES2. [06-096 C.M.R. ch. 115, BPT]
- b. Prior to July 1, 2018, distillate fuel fired in the boilers shall have a maximum sulfur content not to exceed 0.5% by weight. [06-096 C.M.R. ch. 115, BPT]
- c. Beginning July 1, 2018, the Westbrook School Department shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [06-096 C.M.R. ch. 115, BPT]
- d. Compliance with the fuel requirements for the boilers shall be demonstrated by fuel records from the supplier showing the type and percent sulfur of the fuel delivered (if applicable). [06-096 C.M.R. ch. 115, BPT]

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

Emission Unit	Fuel	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
SES1 & SES2	Distillate fuel	0.10	0.10	0.65	0.19	0.05	--
	Natural gas	0.07	0.07	--	0.13	0.11	0.01

3. Visible emissions from each of the boilers shall not exceed 10% opacity on a six-minute block average basis when firing natural gas or 20% opacity on a six-minute block average basis when firing distillate fuel. [06-096 C.M.R. ch. 115, BPT]

(18) Congin Elementary School

A. Boiler (CES1)

1. CES1 shall only fire natural gas. [06-096 C.M.R. ch. 115, BPT]
2. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
CES1	PM	0.05	06-096 C.M.R. ch. 115, BPT

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

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
CES1	0.30	0.30	--	0.58	0.49	0.03

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

B. Generator (CES2)

1. CES2 shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 115, BPT]
2. The Westbrook School Department shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, the number of hours each unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [06-096 C.M.R. ch. 115, BPT]
3. The fuel sulfur content for CES2 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]

4. 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)
CES2 1.1 MMBtu/hr distillate fuel	0.34	0.34	--	4.85	1.05	0.40

5. Visible emissions from CES2 shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]
6. CES2 is only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. CES2 is not to be used for prime power when reliable offsite power is available; nor to operate or to be contractually obligated to be available in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity.

(19) **Westbrook Middle School**

A. Boilers (WMS1, WMS2)

1. The boilers shall only fire natural gas. [06-096 C.M.R. ch. 115, BPT]
2. Emissions shall not exceed the following in each of the boilers [06-096 C.M.R. ch. 115, BPT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
WMS1, WMS2,	0.08	0.08	--	0.15	0.12	0.01

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

B. Generator (WMS3)

1. The fuel fired in the WMS3 shall not exceed 15 ppm sulfur (0.0015% sulfur), except that any existing fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. Compliance with the fuel sulfur content limit shall be based on fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [40 C.F.R. § 60.4207(b) and 06-096 C.M.R. ch. 115]

2. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
WMS3	PM	0.12	06-096 C.M.R. ch. 115, BPT

3. 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)
WMS3 3.0 MMBtu/hr distillate fuel	0.36	0.36	--	13.23	2.85	1.08

4. Visible emissions from WMS3 shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

5. WMS3 shall meet the applicable requirements of 40 C.F.R. Part 60, Subpart III, including the following: [incorporated under 06-096 C.M.R. ch. 115, BPT]

a. **Manufacturer Certification**

The engine shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in § 60.4202. [40 C.F.R. § 60.4205(b)]

b. **Non-Resettable Hour Meter**

A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 60.4209(a)]

c. **Annual Time Limit for Maintenance and Testing**

(1) As an emergency engine, WMS3 shall be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, 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). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written log) of all engine operating hours. [40 C.F.R. § 60.4211(f) and 06-096 C.M.R. ch. 115]

(2) The Westbrook School Department shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation

shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 60.4214(b)]

d. Operation and Maintenance

The engine shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by the Westbrook School Department that are approved by the engine manufacturer. The Westbrook School Department may only change those emission-related settings that are permitted by the manufacturer. [40 C.F.R. § 60.4211(a)]

(20) **Westbrook High School**

A. Boilers (WHS1, WHS2, WHS3, WHS4)

4. The boilers shall only fire natural gas. [06-096 C.M.R. ch. 115, BPT]
5. Emissions shall not exceed the following in each of the boilers [06-096 C.M.R. ch. 115, BPT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
WHS1, WHS2, WHS3, WHS4	0.08	0.08	--	0.15	0.12	0.01

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

(21) **Westbrook Regional Vocational Center**

A. Boiler (VOC1)

1. VOC1 shall only fire natural gas. [06-096 C.M.R. ch. 115, BPT]
2. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
VOC1	PM	0.05	06-096 C.M.R. ch. 115, BPT

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

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
VOC1	0.42	0.42	--	0.81	0.68	0.04

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

B. Generator (VOC2)

- VOC2 shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 115, BPT]
- The Westbrook School Department shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, the number of hours each unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [06-096 C.M.R. ch. 115, BPT]
- The fuel sulfur content for VOC1 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]
- 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)
VOC2 2.2 MMBtu/hr distillate fuel	0.68	0.68	--	9.70	2.09	0.79

- Visible emissions from VOC2 shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]
- VOC2 is only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. VOC2 is not to be used for prime power when reliable offsite power is available; nor to operate or to be contractually obligated to be available in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity.

C. Parts Washer

The Parts washers at the vocational center is subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130.

1. The Westbrook School Department shall keep records of the amount of solvent added to each parts washer. [06-096 C.M.R. ch. 115, BPT]
2. The following are exempt from the requirements of 06-096 C.M.R. ch. 130 [06-096 C.M.R. ch. 130]:
 - a. 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);
 - b. Wipe cleaning; and,
 - c. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
3. The following standards apply to cold cleaning machines that are applicable sources under 06-096 C.M.R. ch. 130.
 - a. The Westbrook School Department shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 C.M.R. ch. 130]:
 - (1) Waste solvent shall be collected and stored in closed containers.
 - (2) 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.
 - (3) 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.
 - (4) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
 - (5) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the parts washer.
 - (6) 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.
 - (7) Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
 - (8) Work area fans shall not blow across the opening of the parts washer unit.
 - (9) The solvent level shall not exceed the fill line.
 - b. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 C.M.R. ch. 130]

(22) Superintendent's Office

A. Boiler (SUP1)

1. Fuel

- a. Only distillate fuel shall be fired in SUP1. [06-096 C.M.R. ch. 115, BPT]
- b. Prior to July 1, 2018, distillate fuel fired in the boiler shall have a maximum sulfur content not to exceed 0.5% by weight. [06-096 C.M.R. ch. 115, BPT]
- c. Beginning July 1, 2018, the Westbrook School Department shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [06-096 C.M.R. ch. 115, BPT]
- d. Compliance with the fuel requirements for the boiler shall be demonstrated by fuel records from the supplier showing the type and percent sulfur of the fuel delivered (if applicable). [06-096 C.M.R. ch. 115, BPT]

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

Emission Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
SUP1	0.10	0.10	0.65	0.19	0.05	--

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

City of Westbrook
Westbrook School Department
Cumberland County
Westbrook, Maine
A-114-71-H-R/A (SM)

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Departmental
Findings of Fact and Order
Air Emission License
Renewal / Minor Revision

- (23) The Westbrook School Department 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 12 DAY OF September, 2017.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:


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: 02/09/2017

Date of application acceptance: 02/10/2017

Date filed with the Board of Environmental Protection:

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

