



DEPARTMENT ORDER

**Regional School Unit #57  
 York County  
 Waterboro, Maine  
 A-756-71-G-M**

**Departmental  
 Findings of Fact and Order  
 Air Emission License  
 Amendment #1**

**FINDINGS OF FACT**

After review of the air emission license amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

Regional School Unit #57 (RSU #57) was issued Air Emission License A-756-71-F-R on September 12, 2014, for the operation of emission sources associated with the Massabesic High School campus.

RSU #57 has requested a minor revision to their license in order to add propane as a licensed fuel for all four boilers on their license. The Department is also using this amendment as an opportunity to update the fuel sulfur content language and document completion of 40 C.F.R. Part 63, Subpart JJJJJ notification requirements.

The equipment addressed in this license amendment is located at 86 West Road, Waterboro, Maine.

**B. Emission Equipment**

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

**Boilers**

<b>Equipment</b>	<b>Max. Capacity (MMBtu/hr)</b>	<b>Maximum Firing Rate</b>	<b>Fuel Type, % sulfur</b>	<b>Date of Manuf.</b>	<b>Date of Install.</b>	<b>Stack #</b>
Massabesic West Boiler #1	6.3 [each]	45.0 [each]	Distillate fuel, 0.0015%	2002	2002	1
Massabesic West Boiler #2		69.6 [each]	Propane, negl.*	2002	2002	
Massabesic East Boiler #1	2.6 [each]	18.8 [each]	Distillate fuel, 0.0015%	2002	2002	2
Massabesic East Boiler #2		29.1 [each]	Propane, negl.*	2002	2002	

\*This is a new fuel for these units

C. 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.

This amendment will increase emissions by less than 4 ton/year for each single pollutant not including greenhouse gases (GHG) and less than 8 ton/year for all pollutants combined not including GHG. Therefore, this modification is determined to be a minor revision and has been processed as such.

D. Facility Classification

The facility is licensed as follows:

- As a natural minor source of air emissions, because facility emissions cannot exceed 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 new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

B. Massabesic West Boilers #1 and #2 and Massabesic East Boilers #1 and #2

Massabesic West Boilers #1 and #2 and Massabesic East Boilers #1 and #2 are all currently licensed to fire distillate fuel with a maximum sulfur content of 0.5% by weight. RSU #57 has requested to add propane as a fuel for all four boilers. The Department has determined that no additional controls or restrictions are appropriate when firing propane and that the following emission limits constitute BACT when firing propane in Massabesic West Boilers #1 and #2 and Massabesic East Boilers #1 and #2. RSU #57 shall be restricted to a heat input limit of no more than 28,000 MMBtu/year of propane and distillate fuel for all four boilers combined on a calendar year total basis.

Massabesic West Boilers #1 and #2 and Massabesic East Boilers #1 and #2 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, the distillate fuel purchased or otherwise obtained for use in the boilers shall not exceed 0.0015% by weight (15 ppm). Distillate fuel with a sulfur content above 0.0015% by weight (15 ppm) purchased prior to July 1, 2018, may be used until depleted.

**1. BACT Findings**

The BACT emission limits for the boilers when firing propane were based on the following:

- PM/PM<sub>10</sub> – 0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BACT
- SO<sub>2</sub> – 0.018 lb/1,000 gal based on AP-42, Table 1.5-1, dated 7/08
- NO<sub>x</sub> – 13 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
- CO – 7.5 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
- VOC – 1.0 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
- Visible Emissions – 06-096 C.M.R. ch. 115, BACT

The BACT emission limits for the boilers when firing propane are the following:

<b>Unit</b>	<b>Pollutant</b>	<b>lb/MMBtu</b>
Massabesic West Boilers #1 and #2 [each]	PM	0.05

<b>Unit</b>	<b>PM (lb/hr)</b>	<b>PM<sub>10</sub> (lb/hr)</b>	<b>SO<sub>2</sub> (lb/hr)</b>	<b>NO<sub>x</sub> (lb/hr)</b>	<b>CO (lb/hr)</b>	<b>VOC (lb/hr)</b>
Massabesic West Boilers #1 and #2 Propane	0.32	0.32	Negl.	0.90	0.52	0.07
Massabesic East Boilers #1 and #2 Propane	0.13	0.13	Negl.	0.37	0.22	0.03

When firing propane, visible emissions from Stacks #1 and #2 shall each not exceed 10% opacity on a six-minute block average basis.

2. Periodic Monitoring

Periodic monitoring for the boilers shall include recordkeeping to document fuel use both on a calendar year total basis. Documentation shall include the type and quantity of fuel used and sulfur content of the fuel, if applicable. Fuel use shall be converted to heat input (MMBtu) on a calendar year total basis using heating values of 0.0915 MMBtu/gal for propane and 0.14 MMBtu/gal for distillate fuel.

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

Massabesic West Boilers #1 and #2 and Massabesic East Boilers #1 and #2 are considered dual fuel boilers. RSU #57 plans to continue using distillate fuel in addition to propane; therefore, the boilers are still 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 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. Notification forms and additional rule information can be found on the following website: <https://www.epa.gov/stationary-sources-air-pollution/compliance-industrial-commercial-and-institutional-area-source>.

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)] RSU #57 submitted their Initial Notification to EPA on September 22, 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. See chart below:

<b>Boiler Category</b>	<b>Tune-Up Frequency</b>
New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with Less Frequent Tune-up Requirements" listed below	Every 2 years
<b>New and Existing Oil, Biomass, and Coal fired Boilers with Less Frequent Tune-up Requirements</b>	
Seasonal (see definition § 63.11237)	Every 5 years
Limited use (see definition § 63.11237)	Every 5 years
Oil fired boilers with a heat input capacity of ≤ 5MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 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. Delay of the burner inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hour, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [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. Delay of the inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hour, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [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 [40 C.F.R. § 63.11223(b)(6)]:

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.

(v) After conducting the initial boiler tune-up, a Notification of Compliance Status was to 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)] RSU #57 submitted their Notification of Compliance Status to EPA on July 17, 2014.

### (3) Compliance Report

A compliance report shall be prepared by March 1<sup>st</sup> biennially or every five years which covers the previous two or five 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 40 C.F.R. §§ 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 40 C.F.R. §§ 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)]

C. Annual Emissions

RSU #57 shall be restricted to the following annual emissions, based on a calendar year total. The tons per year limits were calculated based on an annual heat input limit of 28,000 MMBtu based on a calendar year total for Massabesic West Boilers #1 and #2 and Massabesic East Boilers #1 and #2 combined:

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

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
Boilers	1.1	1.1	7.1	2.0	1.2	0.2
<b>Total TPY</b>	<b>1.1</b>	<b>1.1</b>	<b>7.1</b>	<b>2.0</b>	<b>1.2</b>	<b>0.2</b>

<b>Pollutant</b>	<b>Tons/year</b>
Single HAP	9.9
Total HAP	24.9

**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:

<b>Pollutant</b>	<b>Tons/Year</b>
PM <sub>10</sub>	25
SO <sub>2</sub>	50
NO <sub>x</sub>	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 Amendment A-756-71-G-M subject to the conditions found in Air Emission License A-756-71-F-R and the following condition.

Severability. The invalidity or unenforceability of any provision of this License Amendment or part thereof shall not affect the remainder of the provision or any other provisions. This License Amendment shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

**SPECIFIC CONDITIONS**

**The following Condition shall replace Condition (16) of Air Emission License A-756-71-F-R (September 12, 2014):**

**(16) Boilers**

**A. Fuel**

1. Massabesic West Boilers #1 and #2 and Massabesic East Boilers #1 and #2 are licensed to fire distillate fuel and propane. [06-096 C.M.R. ch. 115, BPT]
2. Total fuel use for Massabesic West Boilers #1 and #2 and Massabesic East Boilers #1 and #2 combined shall not exceed an annual heat input of 28,000 MMBtu for distillate fuel and propane use combined, based on a calendar year total. [06-096 C.M.R. ch. 115, BPT]
3. The facility shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). Distillate fuel with a sulfur content above 0.0015% by weight (15 ppm) purchased prior to July 1, 2018, may be used until depleted. [06-096 C.M.R. ch. 115, BPT]
4. Compliance 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 calendar year total basis and shall be converted to MMBtu on a calendar year total basis using heating values of 0.0915 MMBtu/gal for propane and 0.14 MMBtu/gal for distillate fuel. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following:

<b>Unit</b>	<b>Fuel</b>	<b>Pollutant</b>	<b>lb/MMBtu</b>	<b>Origin and Authority</b>
Massabesic West Boilers #1 and #2 [each]	Distillate fuel	PM	0.08	06-096 C.M.R. ch. 115, BPT
	Propane	PM	0.05	06-096 C.M.R. ch. 115, BACT

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

<b>Unit</b>	<b>PM (lb/hr)</b>	<b>PM<sub>10</sub> (lb/hr)</b>	<b>SO<sub>2</sub> (lb/hr)</b>	<b>NO<sub>x</sub> (lb/hr)</b>	<b>CO (lb/hr)</b>	<b>VOC (lb/hr)</b>
Massabesic West Boilers #1 and #2 [each] Distillate fuel	0.50	0.50	3.17	0.90	0.23	0.02
Massabesic West Boilers #1 and #2 [each] Propane	0.32	0.32	Negl.	0.90	0.52	0.07
Massabesic East Boilers #1 and #2 [each] Distillate fuel	0.21	0.21	1.31	0.37	0.09	0.01
Massabesic East Boilers #1 and #2 [each] Propane	0.13	0.13	Negl.	0.37	0.22	0.03

D. Visible Emissions

1. When the boilers are firing distillate fuel, visible emissions from Stack #1 and Stack #2 shall each not exceed 20% opacity on a six-minute block average basis, except for no more than two six-minute block averages in a continuous three-hour period. [06-096 C.M.R. ch. 115, BPT]
2. When the boilers are firing propane, visible emissions from Stack #1 and Stack #2 shall each not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BACT]

E. RSU #57 shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJ applicable to Massabesic West Boilers #1 and #2 and Massabesic East Boilers #1 and #2 including, but not limited to, the following [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. See chart below:

<b>Boiler Category</b>	<b>Tune-Up Frequency</b>
New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below	Every 2 years
<b><u>New and Existing Oil, Biomass, and Coal fired Boilers with Less Frequent Tune-up Requirements</u></b>	
Seasonal (see definition § 63.11237)	Every 5 years
Limited use (see definition § 63.11237)	Every 5 years
Oil fired boilers with a heat input capacity of ≤5MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 C.F.R. § 63.11223(a) and 40 C.F.R. Part 63, Subpart JJJJJ, 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. Delay of the burner inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hour, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [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. Delay of the inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hour, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [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 [40 C.F.R. § 63.11223(b)(6)]:
- (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.

2. Compliance Report

A compliance report shall be prepared by March 1<sup>st</sup> biennially or every five years which covers the previous two or five 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 40 C.F.R. §§ 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)]

DONE AND DATED IN AUGUSTA, MAINE THIS 20 DAY OF September, 2018.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Maic Allen Robert Cone for  
PAUL MERCER, COMMISSIONER

**The term of this amendment shall be concurrent with the term of Air Emission License A-756-71-F-R.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 27, 2018

Date of application acceptance: August 28, 2018

Date filed with the Board of Environmental Protection:

This Order prepared by Jonathan E. Rice, Bureau of Air Quality.

