



DEPARTMENT ORDER

**Katahdin Railcar Services LLC
Piscataquis County
Milo, Maine
A-1131-71-E-M**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #3**

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

Central Maine & Quebec Railway US Inc. (CMQR) was issued Air Emission License A-1131-71-A-N on May 17, 2018, for the operation of emission sources associated with their railcar maintenance facility. The license was subsequently amended on November 4, 2019 (A-1131-71-B-A). The license was transferred from CMQR to Katahdin Railcar Services LLC (KRS) on September 2, 2020 (A-1131-71-C-T) and again amended on October 14, 2020 (A-1131-71-D-M).

KRS has requested a minor revision to their license in order to add ethyl acetate to the license Appendix List 2 (Flammable Liquids and Gases).

The equipment addressed in this license amendment is located at 18 B&A Avenue, Milo, Maine.

B. Revision Description

KRS performs maintenance work and cleaning operations on railcars. As part of the car cleaning operation, KRS needs to open the railcar's vapor space and sometimes degas or purge railcars. All railcars that are opened, degassed, or purged at the facility must be included in either List 1 (Commodities Subject to Work Practice Standards Only) or List 2 (Flammable Liquids and Gases) contained in the license appendix.

KRS has requested that ethyl acetate be added to the Appendix List 2 (Flammable Liquids and Gases). Ethyl acetate is a colorless, highly flammable liquid. It is classified as a volatile organic compound (VOC) but not a hazardous air pollutant (HAP).

Best available control technology (BACT) for opening and cleaning of railcars containing List 2 commodities was established in Air Emission License A-1131-71-B-A (11/4/2019)

and clarified in Air Emission License A-1131-71-D-M (10/14/2020). BACT was determined to be the use of an air-assisted, open, elevated flare (Flare #1) and compliance with the Car Cleaning Work Practice Standards. Ethyl acetate is a compound with similar properties to other List 2 commodities. Therefore, the Department determines that its inclusion in the license Appendix List 2 is appropriate and represents BACT for control of VOC emissions.

No increase in the annual VOC emission limit of 49.9 tpy has been requested. Emissions from the opening and cleaning of ethyl acetate railcars will be included in the existing annual VOC emission limit.

C. Annual Emissions

This license amendment will not change the facility's licensed annual emissions.

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-1131-71-E-M subject to the conditions found in Air Emission License A-1131-71-A-N; in amendments A-1131-71-B-A and A-1131-71-D-M; in transfer A-1131-71-C-T; and the following conditions.

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.

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This license amendment will not add, delete, or change any existing license conditions.

This license amendment updates the license Appendix List 2 to include ethyl acetate.

DONE AND DATED IN AUGUSTA, MAINE THIS 16th DAY OF JUNE, 2021.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-1131-71-A-N.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 6/4/2021

Date of application acceptance: 6/4/2021

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

FILED
JUN 16, 2021
State of Maine
Board of Environmental Protection

Appendix

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LIST 2 – FLAMMABLE LIQUIDS AND GASES

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STCC ¹ (If Known)	Commodity	Common Name or Type of Chemical Product	CAS No.	RQ (lbs)
2818414 2818417 2818445 2818446 4908170 4908179 4908180 4909117 4909152 4909159 4909363 4910240 4914105 2085120	Ethanol – Ethyl Alcohol Anhydrous Denatured – Alcohol Beverage Ethanol Gas Denatured Alcohol	Ethanol	64-17-5	None
2899415 4909230	Fatty Acid Esters of Vegetable Fish or Animal Methanol	Methanol	67-56-1	5,000
2899416	Methyl Esters (Methyl Soyate) Diesel from Vegetable oil	Methyl Esters	Various	1,000
2911976	Petroleum Condensate	Natural Gas Condensate	Various	None
2991240	Motor Fuel NEC Liquid (Blends of Alcohol and Motor Fuel)	Gasoline	Various	None
4905419 4905421 4905423 4905424 4905752 4905784 4907603 4909105 4910236	Liquefied Petroleum Gas	Propane / Odorized Propane Butane Ethane	74-98-6 106-97-8 74-84-0	None
4906620	Propylene Oxide	Propylene Oxide	75-56-9	100
4907250	Methyl Methacrylate	Methyl Methacrylate	80-62-6	1,000
4907265	Styrene Monomer	Styrene Monomer	100-42-5	1,000
4912215	Butyl Acrylate	Butyl Acrylate	Various	None

Appendix

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LIST 2 – FLAMMABLE LIQUIDS AND GASES

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STCC¹ (If Known)	Commodity	Common Name or Type of Chemical Product	CAS No.	RQ (lbs)
	Natural Gas	Natural Gas / Methane	74-82-8	None
	Isobutane	Isobutane	75-28-5	None
	P-P Mix	Propylene (75-80%)	115-07-1	None
		Propane (0-3%)	74-98-6	None
	Formaldehyde Solutions with vapor pressure ≥ 0.05 psi		50-00-0	100
1311110 1441314 4910164 4910165 4910187 4910191 4910599	Petroleum Oil Crude Oil or Shale Oil Crude Sand Industrial Oil or Gas Well Fracture Petroleum Crude Petroleum Sour	Crude Oil with a vapor pressure ≥ 0.5 psi	None	None
	Molten Sulfur	>10 ppm H ₂ S	7783-06-4	100
	Ethyl Acetate	Ethyl Acetate	141-78-6	5,000

¹ Standard Transportation Commodity Code