



DEPARTMENT ORDER

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

**Departmental  
Findings of Fact and Order  
Air Emission License  
Amendment #4**

**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) and June 16, 2021 (A-1131-71-E-M).

KRS has requested a minor revision to their license in order to add aluminum hydroxide to the license Appendix List 1 (Commodities Subject to Work Practice Standards Only).

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 aluminum hydroxide be added to the Appendix List 1 (Commodities Subject to Work Practice Standards Only). Aluminum hydroxide is a white, odorless, non-flammable powder. It is not considered a hazardous substance by either *Designation, Reportable Quantities, and Notification*, 40 C.F.R. Part 302.4 or *Emergency Planning and Notification*, 40 C.F.R. Part 355, Appendix A. It is considered a non-hazardous dry material that has the potential to become airborne as particulate matter.

Best available control technology (BACT) for opening and cleaning of railcars containing List 1 commodities was established in Air Emission License A-1131-71-B-A (11/4/2019). BACT was determined to be compliance with the Car Cleaning Work Practice Standards (as specified in A-1131-71-B-A). Aluminum hydroxide is a compound with similar properties to other List 1 commodities. Therefore, the Department determines that its inclusion in the license Appendix List 1 is appropriate and represents BACT for control of particulate matter emissions.

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-F-M subject to the conditions found in Air Emission License A-1131-71-A-N; in amendments A-1131-71-B-A, A-1131-71-D-M, and A-1131-71-E-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.

**This license amendment updates the license Appendix List 1 to include aluminum hydroxide.**

**The following is a new Condition:**

- (25) If the Department determines that any parameter value pertaining to construction and operation of the proposed emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, KRS may be required to submit additional information. Upon written request from the Department, KRS shall provide information necessary to demonstrate AAQS will not be exceeded, potentially including submission of an ambient air quality impact analysis or an application to amend this air emission license to resolve any deficiencies and ensure

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compliance with AAQS. Submission of this information is due within 60 days of the Department's written request unless otherwise stated in the Department's letter.  
[06-096 C.M.R. ch. 115, § 2(O)]

DONE AND DATED IN AUGUSTA, MAINE THIS 18<sup>th</sup> DAY OF JANUARY, 2023.

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: 12/19/2022

Date of application acceptance: 12/20/2022

Date filed with the Board of Environmental Protection:

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

**FILED**  
**JAN 18, 2023**  
**State of Maine**  
**Board of Environmental Protection**

## Appendix

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LIST 1 – COMMODITIES SUBJECT TO WORK PRACTICE STANDARDS ONLY

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STCC <sup>1</sup> (If Known)	Commodity	Common Name or Type of Chemical Product	CAS No.	RQ (lbs)
4912269 4912336 4914146 4914170	Fuel Oil	#2 through #6 fuel oil and diesel fuel	various	None
2821245	Latex (liquid rubber) synthetic	Latex	None	None
2899834	Polyacrylamide-water solution	Polymer	None	None
2899885	Additives Fuel Oil Gasoline or Lubricating Oil	Fuel or lubricating oil additives	Various	None
3295230	Kaolin & Water Slurry	Kaolin	1332-58-7	None
	Kaolin		1318-74-7	
4918723	Sodium Chlorate	Sodium Chlorate (solid powder)	7775-09-9	None
4961605	Heated Asphalt	Asphalt Roofing Flux	8052-42-4	None
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
1441310	Industrial Sand Ungrounded and Unbonded	Sand	Various	None
1471510	Rock Salt	Rock Salt	14762-51-7	None
1491970	Perlite Rock	Perlite Rock (solid)	None	None
2046115	Corn Syrup (Glucose)	Corn Syrup	Various	None
2093342	Rapeseed Oil	Rapeseed Oil	None	None
2812355	Sodium Sulfate (Salt Cake)	Sodium Sulfate (solid)	Various	None
2812534	Potassium Chloride	Potassium Chloride	7447-40-7	None
2911990	Paraffin Wax or Petroleum Wax	Wax	Various	None
3241110	Cement Clinker	Cement (solid)	Various	None
3241115	Cement Hydraulic Portland			
3295956	Limestone Slurry Consisting of Ground Limestone	Lime	Various	None
4918311	Ammonium Nitrate	Ammonium Nitrate	6484-52-2	None
	Hydrochloric Acid	Hydrochloric Acid	7647-01-0	5,000
4930040	Sulfuric Acid	Sulfuric Acid	7664-93-9	1,000
4935240	Sodium Hydroxide (Caustic Soda)	Sodium Hydroxide (solid)	1310-73-2	1,000
	Axperse	Water-based processing aid for industrial operations, no hazardous substances, no flash point	None	None
	Crystalline Silica	Silica	None	None

## Appendix

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STCC <sup>1</sup> (If Known)	Commodity	Common Name or Type of Chemical Product	CAS No.	RQ (lbs)
	Diammonium Sulfate (Trinseo for RAP 740NA Latex)	Styrene-butadiene based polymer (45-55%)	Trade Secret	None
		Diammonium sulfate (<1.5%)	7783-20-2	None
		Water (45-55%)	7732-18-15	None
	Latex LXC 803F NA – Trinseo	Styrene-butadiene based polymer (45-55%) Water (45-55%)	Trade Secret 7732-18-15	None
	CP 615 NA Latex – Trinseo			
	XU 31719.00 Experimental Latex – Trinseo			
	XU 31032.50 Experimental Latex – Trinseo			
	Floperse	Processing aid for industrial operations, no hazardous substances, water-based, no flash point	None	None
	Quartz	Quartz	14808-60-7	None
	Tetrasodium Salt	Acetic acid	64-02-8	None
	Amres 1110-E Wet Strength Resin (water-based, no flash point)		Various	None
	NovaCote 1936HS Surface Sizeing Agent (water-based, no flash point)		Various	None
	Precipitated Calcium Carbonate		471-34-1	None
	Digitall 9708.1 (paper coating solution)	Water (55-75%) Polymers (25-45%)	Trade Secret	None
	Taflonol UMS Series Liquid	Brightener (10-30%) Water (70-90%)	16470-24-9 7732-18-5	None
	Formaldehyde Solutions with vapor pressure <0.05 psi		50-00-0	100
	YaraVera Urea 46-0-0	Urea	57-13-6	None
	Molten Sulfur	≤10 ppm H <sub>2</sub> S	7783-06-4	100
1051311	Aluminum Hydroxide	Hydrated Alumina	21645-51-2	None

<sup>1</sup> Standard Transportation Commodity Code