



DEPARTMENT ORDER

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

**Departmental  
Findings of Fact and Order  
Air Emission License  
Amendment #6**

**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) to revise the BACT analysis for the car cleaning process. The license was transferred from CMQR to Katahdin Railcar Services LLC (KRS) on September 2, 2020 (A-1131-71-C-T). The license was again amended on October 14, 2020 (A-1131-71-D-M), June 16, 2021 (A-1131-71-E-M), January 18, 2023 (A-1131-71-F-M), and July 27, 2023 (A-1131-71-G-M) each to address the cleaning of railcars which previous contained specific commodities.

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

KRS has requested a minor revision to their license to address the applicable requirements of *Degassing of Petroleum Storage Tanks, Marine Vessels, and Transport Vessels*, 06-096 Code of Maine Rules (C.M.R.), ch. 170. This amendment also clarifies the requirements for cleaning railcars that previously stored aviation gasoline, crude oil, and polyethylene copolymer.

B. Emission Equipment

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

**Process Equipment**

<b>Equipment</b>	<b>Pollution Control Equipment</b>
Car Cleaning Lines #1 - #4	Flare #1

### Fuel Burning Equipment

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (scfh)	Fuel Type	Date of Install.	Stack #
Flare #1	24.5	equivalent to 9,500	Propane (pilot)	2019	N/A

#### C. Definitions

Affected Product means gasoline, aviation gasoline, ethanol, and crude oil.

Continuous. For the purposes of the monitors required by this license, continuous means at least one data point is collected and recorded every 15 minutes.

Liquid Leak means the visible dripping of an affected product.

Records or Logs mean either hardcopy or electronic records.

Transport Vessel means any land-based mode of transportation (truck or rail) equipped with a storage tank that is used to transport affected products.

Vapor Leak means a failure of containment that results in the presence of gaseous volatile organic compounds at or above 500 parts per million by volume (ppmv) measured as methane above background on a portable hydrocarbon analyzer, in accordance with 40 C.F.R. Part 60, Appendix A, Method 21 as amended 10/17/2000.

#### D. Application Classification

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

This amendment will not increase licensed emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

#### E. Facility Classification

With the facility-wide SO<sub>2</sub>, VOC, and HAP emission limits, the facility is licensed as follows:

- As a synthetic minor source of criteria pollutants, because KRS is subject to license restrictions that keep facility emissions below major source thresholds for SO<sub>2</sub> and VOC ; 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. Revision Description

*Degassing of Petroleum Storage Tanks, Marine Vessels, and Transport Vessels*, 06-096 C.M.R. ch. 170, addresses the control of emissions from the degassing of certain vessels, including transport vessels (e.g., railcars), when the most recent previous commodity those vessels contained was an affected product as that term is defined in the rule and the definitions section of this license amendment.

KRS has previously been licensed to degas and clean railcars that contained affected products as well as other flammable liquids and gases. These commodities are listed in Appendix List 2 of KRS's license. The license contains control requirements for List 2 commodities established through Best Practical Treatment (BPT) pursuant to 06-096 C.M.R. ch. 115. Emissions from the degassing of railcars containing List 2 commodities must vent to Flare #1 for control of VOC and other pollutants. Note, the Vapor Reduction System referenced in the Order section of this license refers to the system used when the railcars are being hydroblasted and is not part of the vapor control system used for degassing.

In some cases, the requirements contained in 06-096 C.M.R. ch. 170 are more stringent. In other cases, the requirements developed through BPT are more stringent. In each case and as described below, KRS has accepted streamlining and only the more stringent requirement shall be included in the Order section of this license.

The regulation 06-096 C.M.R. ch. 170 contains applicable requirements for railcars that previously carried affected products (i.e., gasoline, ethanol, and crude oil). The BPT requirements apply to all railcars that previously carried a List 2 commodity. Through streamlining, the applicable requirements of 06-096 C.M.R. ch. 170 shall be applied to all railcars that previously carried List 2 commodities except for pressurized commodities

(e.g., propane, butane). Railcars that carried pressurized commodities are exempt from the requirement to continuously monitor VOC concentration and shall instead confirm the gas going to the flare has reached 0% LEL before discontinuing use of the flare. This approach is determined to be most stringent.

Following is a discussion of the requirements of 06-096 C.M.R. ch. 170. Where there may be duplicate or similar requirements established previously through BPT, they are mentioned to address streamlining. For a full accounting of BPT requirements for railcars which carried List 2 commodities, see the Order section of this license.

1. Control Requirements [06-096 C.M.R. ch. 170, § 4]

- a. When emptying and degassing a railcar whose most recently stored product was an affected product, KRS shall:

(1) Empty the railcar of product to the extent practicable;

This requirement is streamlined to the more stringent BPT requirement to thoroughly drain each railcar of liquids prior to opening, venting, or purging the vapor space. [Condition (17)(D)(2) of A-1131-71-D-M, 10/14/2020]

- (2) Exhaust the vapor space of the railcar to a vapor control system designed to achieve a VOC control efficiency of at least 95% until the VOC concentration is less than 5,000 ppmv, measured as methane, or is 10% or less of the lower explosive limit (LEL), as methane, for at least one hour.

Pursuant to Condition (17)(E)(1) of Air Emission License A-1131-71-D-M, except when purging railcars whose most recent commodity was molten sulfur, when processing railcars whose most recent commodity carried is included on Appendix List 2, KRS must purge the railcar with nitrogen and direct all vapors from the purge to Flare #1 until the atmosphere inside the railcar measures 0% LEL. This BPT requirement is considered more stringent than the requirement in (2) above. Therefore, the control requirement has been streamlined to the more stringent BPT requirement, and only this more stringent requirement shall be included in the air emission license.

Except for railcars that carried pressurized commodities, compliance shall be demonstrated through continuous monitoring of the VOC concentration in the line between the railcar being degassed and the vapor control device (Flare #1). [06-096 C.M.R. ch. 170, § 7(B)] For railcars that carried pressurized commodities, compliance shall be demonstrated by sampling the incoming gas at the flare to confirm 0% LEL has been reached prior to discontinuing use of the flare. [06-096 C.M.R. ch. 115, BPT]

The probe inlet of the monitoring instrument shall be located in the line between the railcar being degassed and Flare #1 or other location as approved by the Department. [06-096 C.M.R. ch. 170, §§ 6(B) and (C)]

The monitoring device shall be calibrated, maintained, and operated according to the manufacturer's instructions. [06-096 C.M.R. ch. 170, § 7(A)]

- b. The vapor control system used in the degassing process shall be free of liquid and vapor leaks. This includes, but is not limited to, the degassing equipment, vacuum truck, pumps, hoses, and connections. [06-096 C.M.R. ch. 170, § 4(B)]
- c. Any visible or audible liquid or vapor leak originating from the vapor control device or other associated product recovery device shall be repaired as soon as possible. [06-096 C.M.R. ch. 170, § 4(D)]
- d. All railcars which most recently carried an affected product shall be maintained in a vapor tight condition at all times until the VOC vapors remaining in the railcar are discharged to a vapor control system. [06-096 C.M.R. ch. 170, § 4(E)]

This requirement is streamlined to the more stringent BPT requirement which requires manways and other appurtenances to remain closed and sealed prior to opening, venting, or purging of any railcar (List 1 or List 2 commodity). [Condition (17)(D)(1) of A-1131-71-D-M]

- e. The sludge removal requirements contained in 06-096 C.M.R. ch. 170, § 4(G) are not applicable to KRS because the railcars are not petroleum storage tanks.

## 2. Inspection Requirements

During a degassing event of any railcar which most recently previously contained a List 2 commodity, KRS shall:

- a. At least once per calendar day, inspect the vapor control system for liquid and vapor leaks. To check for vapor leaks, KRS shall use photo ionization detection (PID) technology or flame ionization detection (FID) technology. [06-096 C.M.R. ch. 170, § 5(A)]

This requirement is more stringent than the similar BPT requirement in Condition (17)(D)(7) of A-1131-71-D-M to perform inspections monthly. The BPT requirement is streamlined to the more stringent requirement in 06-096 C.M.R. ch. 170.

Measurement of VOC concentrations shall be conducted in accordance with 40 C.F.R. Part 60, Appendix A, Method 21, using an appropriate analyzer calibrated with methane, at a distance of one inch (2.54 cm) or less from the source.

Alternate test methods may be allowed upon written approval by the Department. [06-096 C.M.R. ch. 170, § 6(A)]

No later than January 31, 2024, KRS shall submit to the Department for approval an inspection plan that addresses the locations that will be included in the daily vapor control system inspections and the procedures used to confirm calibration of the measurement equipment. [06-096 C.M.R. ch. 115, BPT]

- b. If a liquid or vapor leak is observed, degassing must be discontinued within two hours of leak observance unless the leak is repaired or discontinuing degassing would present an imminent safety hazard. [06-096 C.M.R. ch. 170, § 5(B)]
3. During times the vapor control system is in use, KRS shall continuously monitor and record the presence of flame for Flare #1. [06-096 C.M.R. ch. 170, § 7(C)]

This requirement is streamlined with the BPT requirement which requires KRS to monitor the presence of flame during all operation of Flare #1 using either a thermocouple or infrared monitor. [Condition (17)(E)(4) of A-1131-71-D-M]

#### 4. Recordkeeping

KRS shall maintain the following records for each degassing event and make them available to the Department upon request pursuant to 06-096 C.M.R. ch. 170, § 8:

- a. KRS's contact person name and telephone number;
- b. For each railcar that is degassed, its capacity and, if different, the volume (cubic feet) of vapor space degassed;
- c. The product most recently stored in the railcar prior to degassing;
- d. Type of vapor control system used;
- e. Design control efficiency of the vapor control system;
- f. Results of all liquid and vapor leak inspections and repairs conducted in accordance with the provisions of 06-096 C.M.R. ch. 170, § 5 including:
  - (1) The date of the inspection;
  - (2) Calibration records for the PID or FID used;
  - (3) Instrument readings from each inspection point;
  - (4) Description of any detected leaks, holes, tears or other openings found;
  - (5) Description of any resulting corrective action or repairs and the dates they were made.
- g. Results of testing conducted in accordance with 06-096 C.M.R. ch. 170, § 6;
- h. Estimate of VOC emissions from the degassing event before control efficiency is applied (i.e., pre-control emissions); and
- i. Estimate of VOC emissions from the degassing event after application of controls.

C. List 1 and List 2 Revisions

KRS has requested clarification that aviation gasoline (av gas) is as a type of gasoline included in the approved Appendix List 2 commodities (Flammable Liquids and Gases). The Department agrees that av gas is a type of gasoline that is already included in List 2 and has added it as a common name description.

Crude oil with a vapor pressure less than 0.5 psi is listed as an Appendix List 1 commodity (Commodities Subject to Work Practice Standards Only). As discussed earlier, crude oil is an affected product as defined in 06-096 C.M.R. ch. 170. As an affected product, railcars which most recently carried any type of crude oil are subject to the same applicable control, monitoring, and recordkeeping requirements as List 2 commodities. Therefore, crude oil must be considered a List 2 commodity. List 1 and List 2 have been updated accordingly.

KRS has requested that polyethylene copolymer be added to the Appendix List 1. As proposed, polyethylene copolymer is a translucent to white pellet. 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). Polyethylene copolymer 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.

D. 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-H-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, A-1131-71-E-M, A-1131-71-F-M, and A-1131-71-G-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.

### **SPECIFIC CONDITIONS**

**The following shall replace Condition (17) of Air Emission License A-1131-71-D-M:**

**(17) Opening of Railcars and Car Cleaning Lines #1 - #4**

- A. Before opening the vapor space, venting, or purging any railcar, KRS shall determine the commodity most recently carried by the railcar. [06-096 C.M.R. ch. 115, BPT]
- B. KRS shall not open the vapor space, vent, or purge railcars which most recently carried commodities not included in Appendix Lists 1 or 2 without prior written approval by the Department. The Department may require KRS to apply for a license modification, including a detailed BACT analysis, to add commodities to a list. [06-096 C.M.R. ch. 115, BPT]
- C. KRS shall not open the vapor space of, vent, or purge railcars which most recently carried a material with a Reportable Quantity (RQ) less than or equal to 10 pounds pursuant to *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. [06-096 C.M.R. ch. 115, BPT]
- D. KRS shall comply with the following work practice standards for all railcars (i.e., both List 1 and List 2) which are opened, vented, or purged, as applicable.
  - 1. Prior to opening the vapor space of, venting, or purging a railcar, the manways and other appurtenances shall remain closed and sealed. [06-096 C.M.R. ch. 115, BPT and 06-096 C.M.R. ch. 170, § 4(E)]
  - 2. To the amount practicable, each railcar shall be thoroughly drained of liquids prior to vapor space opening, venting, or purging. [06-096 C.M.R. ch. 115, BPT and 06-096 C.M.R. ch. 170, § 4(A)(1)]
  - 3. All VOC/HAP containing liquids drained from the railcar prior to vapor space opening, venting, or purging shall be collected and stored in closed, air-tight containers. [06-096 C.M.R. ch. 115, BPT]
  - 4. The solutions used in the Cleaning Operations shall consist of steam, hot or cold water, and low-VOC (<5% by weight) containing detergents. [06-096 C.M.R. ch. 115, BPT]



5. During the Cleaning Operations, exhaust from railcars shall be vented through the Vapor Reduction System. [06-096 C.M.R. ch. 115, BPT]
6. The Vapor Reduction System shall be maintained in good working order per the manufacturer’s written specifications. [06-096 C.M.R. ch. 115, BPT]
7. KRS shall perform monthly inspections of the Vapor Reduction System to check for leaks, carbon breakthrough, or other malfunctions. [06-096 C.M.R. ch. 115, BPT]

E. List 2 Commodities

1. Except as provided for below, when processing railcars whose most recent commodity carried is included on Appendix List 2, KRS shall purge the railcar with nitrogen and direct all vapors from the purge to Flare #1 until the atmosphere inside the railcar measures 0% LEL. [06-096 C.M.R. ch. 115, BPT and 06-096 C.M.R. ch. 170, § 4(A)(2)]
2. When purging railcars whose most recent commodity was molten sulfur, and the railcar vapor space has an H<sub>2</sub>S concentration greater than 10 ppm, KRS shall purge the railcar with air and direct all vapors from the purge to Flare #1 until the vapor space inside the railcar measures 10 ppm or less of H<sub>2</sub>S. [06-096 C.M.R. ch. 115, BPT]
3. The vapor control system used in the degassing process shall be free of liquid and vapor leaks. This includes, but is not limited to, the degassing equipment, vacuum truck, pumps, hoses, and connections. [06-096 C.M.R. ch. 170, § 4(B)]
4. Any visible or audible liquid or vapor leak originating from the vapor control device or other associated product recovery device shall be repaired as soon as possible. [06-096 C.M.R. ch. 170, § 4(D)]
5. The pilot for Flare #1 shall be lit prior to commencing purging of any railcar being vented to it. [06-096 C.M.R. ch. 115, BPT]
6. Emissions shall not exceed the following:

<b>Emission Unit</b>	<b>Pollutant</b>	<b>lb/MMBtu</b>	<b>Origin and Authority</b>
Flare #1	PM	0.05	06-096 C.M.R. ch. 115, BPT

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

<b>Emission Unit</b>	<b>PM (lb/hr)</b>	<b>PM<sub>10</sub> (lb/hr)</b>	<b>NO<sub>x</sub> (lb/hr)</b>	<b>CO (lb/hr)</b>
Flare #1	1.23	1.23	1.67	7.61

8. Visible emissions from Flare #1 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

9. Monitoring Requirements

- a. Except for railcars that carried pressurized commodities, KRS shall continuously monitor the VOC concentration in the line between the railcar being degassed and the vapor control device (Flare #1) whenever railcars which most recently carried List 2 commodities are degassed. [06-096 C.M.R. ch. 170, §§ 6(B), 6(C) and 7(B)]

The monitoring device shall be calibrated, maintained, and operated according to the manufacturer's instructions. [06-096 C.M.R. ch. 170, § 7(A)]

- b. For railcars that carried pressurized commodities, KRS shall sample the incoming gas at the flare to confirm 0% LEL has been reached prior to discontinuing use of the flare. [06-096 C.M.R. ch. 115, BPT]
- c. During all operation of Flare #1, the presence of the pilot flame shall be continuously monitored using a thermocouple or equivalent device. An infrared monitor is considered equivalent to a thermocouple for pilot flame monitoring purposes. [06-096 C.M.R. ch. 115, BPT and 06-096 C.M.R. ch. 170, § 7(C)]

F. Inspection Requirements

During a degassing event of any railcar which most recently previously contained a List 2 commodity, KRS shall:

1. At least once per calendar day, inspect the vapor control system for liquid and vapor leaks. To check for vapor leaks, KRS shall use photo ionization detection (PID) technology or flame ionization detection (FID) technology. [06-096 C.M.R. ch. 170, § 5(A)]
- a. Measurement of VOC concentrations shall be conducted in accordance with 40 C.F.R. Part 60, Appendix A, Method 21, using an appropriate analyzer calibrated with methane, at a distance of one inch (2.54 cm) or less from the source. Alternate test methods may be allowed upon written approval by the Department. [06-096 C.M.R. ch. 170, § 6(A)]
- b. No later than January 31, 2024, KRS shall submit to the Department for approval an inspection plan that addresses the locations that will be included in the daily vapor control system inspections and the procedures used to confirm calibration of the measurement equipment. [06-096 C.M.R. ch. 115, BPT]

2. If a liquid or vapor leak is observed, degassing must be discontinued within two hours of leak observance unless the leak is repaired or discontinuing degassing would present an imminent safety hazard. [06-096 C.M.R. ch. 170, § 5(B)]
- G. Compliance with the requirements for opening the vapor space, venting, or purging of railcars and for Car Cleaning Lines #1 - #4 shall be demonstrated by the following recordkeeping [06-096 C.M.R. ch. 115, BPT]:
1. Logs of each railcar opened, vented, purged, or cleaned including:
    - a. Date and time the purging began and ended;
    - b. Last material the railcar carried and whether it is a List 1 or List 2 commodity;
    - c. Whether or not the railcar purge was controlled by Flare #1;
    - d. If controlled by Flare #1, logs indicating staff checked that the flare pilot was lit prior to commencing purging of the railcar;
    - e. Whether the last material the railcar carried contained sulfur compounds (only for railcars sent to Flare #1);
    - f. Volume of the railcar vapor space;
    - g. Final LEL (or H<sub>2</sub>S ppm for molten sulfur railcars) reading when purging ended (List 2 materials only);
    - h. Whether or not the Vapor Reduction System was utilized during cleaning.
  2. Records of the liquid collected and final disposition of the material (e.g. shipped off-site) including dates and the amount of each material.
  3. Amount of propane (gallons) fired in Flare #1 on a monthly basis. The amount of propane purchased may be used in lieu of propane fired.
  4. Hours of operation for Flare #1 on a monthly basis.
  5. Records of monthly inspections and any maintenance activities (planned or unplanned) performed on the Vapor Reduction System including the dates the carbon is replaced.
  6. Records of any calibration and maintenance activities performed on the explosimeter and H<sub>2</sub>S monitor.
  7. Monthly calculations of the VOC and HAP emissions from the railcar cleaning process and opening the vapor space, venting, or purging of railcars. Emissions for all railcars (Lists 1 and 2) opened, vented, or purged per month shall be summed to provide the monthly total. Emissions shall be based on calculated working losses from the railcar through use of EPA's TANKS program and the assumed combined capture and control efficiency (e.g., 0% for List 1 commodities, 98% for List 2 commodities).
  8. Monthly calculations of the SO<sub>2</sub> emissions from the opening the vapor space, venting, or purging of railcars. Emissions of all railcars containing sulfur compounds which were sent to Flare #1 shall be summed to provide the monthly total.

H. KRS shall maintain the following records for each degassing event and make them available to the Department upon request pursuant to 06-096 C.M.R. ch. 170, § 8:

1. KRS's contact person name and telephone number;
2. For each railcar that is degassed, its capacity and, if different, the volume (cubic feet) of vapor space degassed;
3. The product most recently stored in the railcar prior to degassing;
4. Type of vapor control system used;
5. Design control efficiency of the vapor control system;
6. Results of all liquid and vapor leak inspections and repairs conducted in accordance with the provisions of 06-096 C.M.R. ch. 170, § 5 including:
  - a. The date of the inspection;
  - b. Calibration records for the PID or FID used;
  - c. Instrument readings from each inspection point;
  - d. Description of any detected leaks, holes, tears or other openings found;
  - e. Description of any resulting corrective action or repairs and the dates they were made.
7. Results of testing conducted in accordance with 06-096 C.M.R. ch. 170, § 6;
8. Estimate of VOC emissions from the degassing event before control efficiency is applied (i.e., pre-control emissions); and
9. Estimate of VOC emissions from the degassing event after application of controls.

DONE AND DATED IN AUGUSTA, MAINE THIS 14<sup>th</sup> DAY OF NOVEMBER, 2023.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for  
MELANIE LOYZIM, COMMISSIONER

The term of this license amendment shall be ten (10) years from the issuance of Air Emission License A-1131-71-A-N (issued 5/17/2018).

[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.]

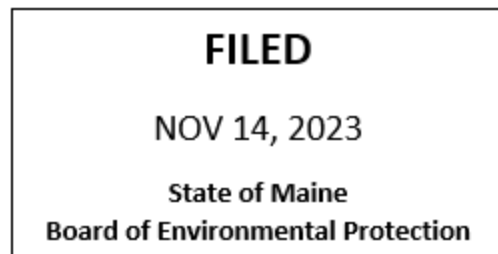
PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 8/31/2023

Date of application acceptance: 8/31/2023

Date filed with the Board of Environmental Protection:

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



## 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
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
	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%)	Trade Secret 7732-18-15	None

## 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)
	CP 615 NA Latex – Trinseo	Water (45-55%)		
	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
2821142	Polyethylene Copolymer (pellets)	1-Butene, polymer with ethene Ethylene, polymer with 1-butene Ethene-Butene copolymer	25087-34-7	None

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

## Appendix

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### LIST 2 – FLAMMABLE LIQUIDS AND GASES

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STCC <sup>1</sup> (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, Aviation 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

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LIST 2 – FLAMMABLE LIQUIDS AND GASES

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STCC <sup>1</sup> (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 $\geq 0.05$ 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 $\geq 0.5$ psi	None	None						
4917403	Molten Sulfur				>10 ppm H <sub>2</sub> S	7783-06-4	100			
4909160	Ethyl Acetate				Ethyl Acetate	141-78-6	5,000			
4909382 4914247 4914256 2911791	Hydrotreated Light Distillate Stoddard Solvent Mineral Oil Hydrocarbon Solvent				Petroleum Distillates	64742-47-8	None			
4912285	Alkenes, C11-C13, C12 Rich							Olefins	68526-58-9	None
2814167	Toluene							Aromatic Hydrocarbons	108-88-3	1,000
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						

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