



DEPARTMENT ORDER

XNG(Maine) LLC
York County
Eliot, Maine
A-1142-71-B-A

**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

XNG(Maine) LLC (XNG) was issued Air Emission License A-1142-71-A-N on July 11, 2019, for the operation of emission sources associated with their natural gas dispensing facility.

XNG has requested an amendment to their license in order to:

1. Add two natural gas-fired boilers;
2. Rename Compressor #1 to Compressor #6;
3. Clarify the requirements applicable to Compressor #6;
4. Address fugitive emissions of VOC.

The equipment addressed in this license amendment is located at 525 Harold Dow Highway in Eliot, Maine.

B. Emission Equipment

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

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (scf/hr)	Fuel Type, % sulfur	Date of Manuf.	Date of Install.
Boiler #1	3.0	2,941	natural gas, negligible	2019	2019
Boiler #2	3.0	2,941	natural gas, negligible	2019	2019

Stationary Engines

Equipment	Max. Input Capacity (MMBtu/hr)	Max. Firing Rate (scf/hr)	Rated Output Capacity (bhp)	Fuel Type, % sulfur	Date of Manuf.	Date of Install.
Compressor #6*	9.9	9,700	1,340	natural gas, negligible	April 2009	2019

*Compressor #1 has been renamed to Compressor #6 for consistency with facility naming.

C. Definitions

Records or Logs mean either hardcopy or electronic records.

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.

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:

Pollutant	Current License (tpy)	Future License (tpy)	Net Change (tpy)	Significant Emission Levels
PM	1.1	0.4	-0.7	100
PM ₁₀	1.1	0.4	-0.7	100
SO ₂	0.1	–	-0.1	100
NO _x	6.5	15.7	+9.2	100
CO	13.1	28.4	+15.3	100
VOC	6.5	8.7	+2.2	50*

*XNG is located in an area of the state included in the Ozone Transport Region. Therefore, the significant emission level for VOC is 50 tpy.

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

E. Facility Classification

The facility is licensed as follows:

- As a natural minor source of air emissions, because no license restrictions are necessary to keep facility emissions below 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 *Definitions Regulation*, 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

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. Process Description

XNG operates a compressed natural gas (CNG) dispensing station which is connected to the pipeline operated by Maritimes & Northeast Pipeline, L.L.C. XNG transfers natural gas from the pipeline to tractor trailer trucks which transport the CNG to end users in the New England area. Boilers #1 and #2 are used as gas heaters to reheat the natural gas when it cools due to decompression. XNG has five electrically driven compressors which are used to load the tractor trailers.

In addition, XNG sometimes transfers natural gas in the other direction, i.e., unloading gas from tractor trailers and transferring it to the pipeline. In these instances, Compressor #6 is used to overcome the pressure to inject the gas into the pipeline.

C. Boilers #1 and #2

XNG operates two identical Lochnivar Power-Fin Model PB-3000 boilers, each with a maximum design heat input capacity of 3.0 MMBtu/hr firing natural gas. These boilers were installed in 2019, and each exhausts through its own horizontal stack which is seven feet above ground level.

1. BACT Findings

XNG submitted a BACT analysis for control of emissions from Boilers #1 and #2.

a. Particulate Matter (PM, PM₁₀)

XNG has proposed to burn only low-ash content fuels (natural gas) in the boilers. Additional add-on pollution controls are not economically feasible due to the cost of control equipment compared to the relatively small amount of pollutant controlled.

BACT for PM/PM₁₀ emissions from Boilers #1 & #2 is the firing of only natural gas and the emission limits listed in the tables below.

b. Sulfur Dioxide (SO₂)

XNG has proposed to fire only natural gas in the boilers. The use of this fuel results in minimal emissions of SO₂, and additional add-on pollution controls are not economically feasible due to the cost of control equipment compared to the relatively small amount of pollutant controlled.

BACT for SO₂ emissions from Boilers #1 & #2 is the firing of only natural gas and the emission limits listed in the tables below.

c. Nitrogen Oxides (NO_x)

XNG has proposed the use of low-NO_x burners (LNBs) on Boilers #1 & #2 which targets a NO_x concentration of 10 parts per million (ppm); however, the vendor does not guarantee this emission rate. Additional add-on pollution controls are not economically feasible due to the cost of control equipment compared to the relatively small amount of pollutant controlled.

BACT for NO_x emissions from Boilers #1 & #2 is the firing of only natural gas, use of LNBs, and the emission limits listed in the tables below.

d. Carbon Monoxide (CO) and Volatile Organic Compounds (VOC)

Several control strategies for the control of CO and VOC were considered including oxidation catalysts and thermal oxidizers.

Oxidation catalysts and thermal oxidizers both have high capital, maintenance, and operational costs considering the size of the boilers in question. These controls were determined to not be economically feasible.

BACT for CO and VOC emissions from Boilers #1 & #2 is the firing of only natural gas and the emission limits listed in the tables below.

e. Emission Limits

The BACT emission limits for Boilers #1 & #2 were based on the following:

- PM/PM₁₀ – 7.6 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
- SO₂ – 0.6 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
- NO_x – 100 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
- CO – 84 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
- VOC – 5.5 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
- Visible Emissions – 06-096 C.M.R. ch. 101

The BACT emission limits for Boilers #1 & #2 are the following:

Unit	Pollutant	lb/MMBtu
Boiler #1	PM	0.01
Boiler #2	PM	0.01

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.02	0.02	–	0.29	0.25	0.02
Boiler #2	0.02	0.02	–	0.29	0.25	0.02

2. Visible Emissions

Visible emissions from Boilers #1 & #2 (each) shall not exceed 10% opacity on a six-minute block average basis.

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

Due to their size, Boilers #1 & #2 are not 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

Boilers #1 & #2 are not 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. Natural gas-fired units are exempt from the requirements of this regulation. [40 C.F.R. §§63.11195(e)]

D. Compressor #6

XNG operates Compressor #6 (previously named Compressor #1). It uses a Caterpillar G3516LE engine to compress natural gas for injection into the nearby natural gas pipeline. It is a non-emergency, spark-ignition, lean-burn, stationary engine with a maximum heat input of 9.9 MMBtu/hr and a rated output of 1,340 brake horsepower (bhp) that fires natural gas. It is equipped with an oxidation catalyst.

1. BPT Findings

BACT for Compressor #6 was established in Air Emission License A-1142-71-A-N, issued July 11, 2019, and were primarily based on either emission factors from AP-42 or applicable standards in 40 C.F.R. Part 60, Subpart JJJJ. Although the basis of the BACT determinations remains the same, incorrect emission standards were used in the previous license and are corrected here.

The BPT emission limits for the Compressor #6 are based on the following:

- PM/PM₁₀ - 0.01 lb/MMBtu based on AP-42 Table 3.2-2 dated 7/00
- SO₂ - 5.88 x 10⁻⁴ lb/MMBtu based on AP-42 Table 3.2-2 dated 7/00
- NO_x - 2.0 g/bhp-hr based on 40 C.F.R. Part 60, Subpart JJJJ, Table 1
- CO - 4.0 g/bhp-hr based on 40 C.F.R. Part 60, Subpart JJJJ, Table 1
- VOC - 1.0 g/bhp-hr based on 40 C.F.R. Part 60, Subpart JJJJ, Table 1
- Opacity - 06-096 C.M.R. ch. 115, BPT

The BPT emission limits for Compressor #6 are the following:

Unit	Pollutant	lb/MMBtu
Compressor #6	PM	0.01

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Compressor #6	0.10	0.10	0.01	5.91	11.82	2.95

Visible emissions from Compressor #6 shall not exceed 10% opacity on a six-minute block average basis.

Total fuel use for Compressor #6 shall not exceed 43,000,000 scf/year of natural gas on a calendar year basis. Records of annual fuel use in Compressor #6 shall be kept on a monthly and calendar year basis.

2. 40 C.F.R. Part 60, Subpart JJJJ

Compressor #6 is a non-emergency, non-certified, stationary engine manufactured in April 2009 with a maximum engine power of 1,340 bhp.

Standards of Performance for Spark Ignition Internal Combustion Engines, 40 C.F.R. Part 60, Subpart JJJJ is applicable to Compressor #6 since the unit was ordered after June 12, 2006, and manufactured after July 1, 2008. [40 C.F.R. § 60.4230] By meeting the requirements of 40 C.F.R. Part 60, Subpart JJJJ, the unit also meets the requirements found in the *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 C.F.R. Part 63, Subpart ZZZZ. [40 C.F.R. § 63.6590(c)]

A summary of the currently applicable federal 40 C.F.R. Part 60, Subpart JJJJ requirements is listed below.

a. Initial Notification

XNG shall submit an initial notification to EPA pursuant to 40 C.F.R. § 60.7(a)(1) which contains the following information:

- (1) Name and address of the owner or operator;
 - (2) Address of the affected source;
 - (3) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;
 - (4) Emission control equipment; and
 - (5) Fuel used.
- [40 C.F.R. § 60.4245(c)]

b. Emission Standards

Compressor #6 is subject to emission standards for non-emergency, spark ignition, natural gas-fired engines between 500 – 1,350 Hp manufactured prior to July 1, 2010, contained in 40 C.F.R. Part 63, Subpart JJJJ, Table 1 pursuant to 40 C.F.R. § 63.4233(e).

c. Control Requirements

The air-to-fuel ratio controller (AFR controller) must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times. [40 C.F.R. § 60.4243(g)]

d. Compliance Demonstration

- (1) Within 60 days of achieving the maximum production rate, but not later than 180 days from initial startup, XNG shall conduct an initial performance test on the engine to demonstrate compliance with the applicable NO_x, CO, and VOC emission standards in Table 1. [40 C.F.R. §§ 60.8(a) and 60.4243(b)(2)(ii)]
- (2) XNG shall conduct subsequent performance tests every 8,760 hours or 3 years, whichever comes first. [60.4243(b)(2)(ii)]
- (3) XNG shall provide 30-days' notice of any performance test to both the Department and EPA. [40 C.F.R. § 60.8(d)]
- (4) Performance tests shall be conducted in accordance with 40 C.F.R. § 60.4244 including, but not limited to, the following:
 - (i) Unless otherwise approved by EPA, each performance test shall be conducted within 10% of 100% peak (or the highest achievable) load. [40 C.F.R. § 60.4244(a)]
 - (ii) When calculating emissions of VOC, emissions of formaldehyde shall not be included. [40 C.F.R. § 60.4244(f)]
- (5) XNG shall submit a copy of each performance test report to the Department and EPA within 30 days after the test has been completed. [40 C.F.R. § 60.4245(d) and 06-096 C.M.R. ch. 115]

e. Maintenance Plan

XNG shall keep a maintenance plan and records of conducted maintenance. XNG shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 60.4243(b)(2)(ii)]

f. Recordkeeping

XNG shall keep records of the following for Compressor #6:

- (1) All notifications submitted to comply with this subpart;
- (2) All maintenance conducted on the engine;
- (3) Documentation that the engine meets the emission standards (e.g., copies of performance test reports or supplier certification). [40 C.F.R. § 60.4245(a)]

E. Performance Test Protocol

For any performance testing required by this license, XNG shall submit to the Department for approval a performance test protocol, as outlined in the Department's Performance Testing Guidance, at least 30 days prior to the scheduled date of the performance test. [06-096 C.M.R. ch. 115, BPT]

The Department's Performance Testing Guidance is available online at:
<https://www.maine.gov/dep/air/emissions/testing.html>

F. Fugitive Emissions of VOC

Operation of the facility's equipment and maintenance activities will result in fugitive emissions of natural gas. Natural gas is comprised primarily of methane and ethane which, by definition, are not VOC. Natural gas contains less than 1% VOC by weight. Annual combined emissions of VOC from fugitive emissions are not expected to exceed 2.0 tpy based on expected operation and similarity to other licensed sources.

XNG shall keep records of the venting of natural gas for maintenance activities or any other reason including reason, date, time, duration, and quantity of natural gas releases. XNG shall notify the Department in advance of any scheduled venting event that is expected to result in the release of more than 85,000 scf of natural gas. XNG shall notify the Department within two working days of any unscheduled venting event that results in the release of more than 85,000 scf of natural gas.

G. Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility's annual air license fee and establishing the facility's potential to emit (PTE). Only licensed equipment is included, i.e., emissions from insignificant activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included except when required by state or federal regulations. Maximum potential emissions were calculated based on the following assumptions:

- Unlimited operation of Boilers #1 and #2;
- Firing 43 million scf/yr of natural gas in Compressor #6; and
- A limit on fugitive VOC emissions of 2.0 tpy.

Please note, this information should not be construed to represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

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

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boiler #1	0.1	0.1	–	1.3	1.1	0.1
Boiler #2	0.1	0.1	–	1.3	1.1	0.1
Compressor #6	0.2	0.2	–	13.1	26.2	6.5
Fugitive	–	–	–	–	–	2.0
Total TPY	0.4	0.4	–	15.7	28.4	8.7

Pollutant	Tons/year
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:

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 amendment.

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-1142-71-B-A subject to the conditions found in Air Emission License A-1142-71-A-N 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 (16) of Air Emission License A-1142-71-A-N:

(16) Compressor #6

- A. XNG shall fire only natural gas in Compressor #6. [06-096 C.M.R. ch. 115, BPT]
- B. Total fuel use for Compressor #6 shall not exceed 43,000,000 scf/year of natural gas on a calendar year basis. Records of annual fuel use in Compressor #6 shall be kept on a monthly and calendar year basis. [06-096 C.M.R. ch. 115, BPT]
- C. Compressor #6 shall be equipped with an oxidation catalyst for control of NO_x, CO, and VOC. [06-096 C.M.R. ch. 115, BPT]
- D. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Unit	Pollutant	lb/MMBtu	Origin and Authority
Compressor #6	PM	0.01	06-096 C.M.R. ch. 115, BPT

- E. 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)
Compressor #6	0.10	0.10	0.01	5.91	11.82	2.95

- F. Visible emissions from Compressor #6 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]
- G. Compressor #6 shall meet the applicable requirements of 40 C.F.R. Part 60, Subpart JJJJ, including the following:
[incorporated under 06-096 C.M.R. ch. 115, BPT]

1. Initial Notification

XNG shall submit an initial notification to EPA pursuant to 40 C.F.R. § 60.7(a)(1) which contains the following information:

- a. Name and address of the owner or operator;
- b. Address of the affected source;
- c. Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;
- d. Emission control equipment; and
- e. Fuel used.
[40 C.F.R. § 60.4245(c)]

2. Control Requirements

The air-to-fuel ratio controller (AFR controller) must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times. [40 C.F.R. § 60.4243(g)]

3. Compliance Demonstration

- a. Within 60 days of achieving the maximum production rate but not later than 180 days from initial startup, XNG shall conduct an initial performance test on the engine to demonstrate compliance with the applicable NO_x, CO, and VOC emission standards in 40 C.F.R. Part 60, Subpart JJJJ, Table 1 as shown below.
[40 C.F.R. §§ 60.8(a) and 60.4243(b)(2)(ii)]

Pollutant	Standard (g/bhp-hr)
NO _x	2.0
CO	4.0
VOC	1.0

- b. XNG shall conduct subsequent performance tests every 8,760 hours or 3 years, whichever comes first. [60.4243(b)(2)(ii)]
- c. XNG shall provide 30-days' notice of any performance test to both the Department and EPA. [40 C.F.R. § 60.8(d)]
- d. Performance tests shall be conducted in accordance with 40 C.F.R. § 60.4244 including, but not limited to, the following:
 - (1) Unless otherwise approved by EPA, each performance test shall be conducted within 10% of 100% peak (or the highest achievable) load. [40 C.F.R. § 60.4244(a)]
 - (2) When calculating emissions of VOC, emissions of formaldehyde shall not be included. [40 C.F.R. § 60.4244(f)]
- e. XNG shall submit a copy of each performance test report to the Department and EPA within 30 days after the test has been completed. [40 C.F.R. § 60.4245(d) and 06-096 C.M.R. ch. 115]

4. Maintenance Plan

XNG shall keep a maintenance plan and records of conducted maintenance. XNG shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 60.4243(b)(2)(ii)]

5. Recordkeeping

XNG shall keep records of the following for Compressor #6:

- a. All notifications submitted to comply with this subpart;
- b. All maintenance conducted on the engine;
- c. Documentation that the engine meets the emission standards (e.g., copies of performance test reports or supplier certification). [40 C.F.R. § 60.4245(a)]

The following are New Conditions:

(19) Performance Test Protocol

For any performance testing required by this license, XNG shall submit to the Department for approval a performance test protocol, as outlined in the Department's Performance Testing Guidance, at least 30 days prior to the scheduled date of the performance test. [06-096 C.M.R. ch. 115, BPT]

(20) Boilers #1 & #2

A. XNG shall fire only natural gas in Boilers #1 & #2. [06-096 C.M.R. ch. 115, BACT]

B. Boilers #1 & #2 shall each be equipped with low-NO_x burners. [06-096 C.M.R. ch. 115, BACT]

C. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.01	06-096 C.M.R. ch. 115, BACT
Boiler #2	PM	0.01	06-096 C.M.R. ch. 115, BACT

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

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.02	0.02	–	0.29	0.25	0.02
Boiler #2	0.02	0.02	–	0.29	0.25	0.02

E. Visible emissions from Boilers #1 & #2 (each) shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 3(A)(3)]

(21) Fugitive Emissions of VOC

A. XNG shall keep records of the venting of natural gas for maintenance activities or any other reason including reason, date, time, duration, and quantity of natural gas releases. [06-096 C.M.R. ch. 115, BACT]

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- B. XNG shall notify the Department in advance of any scheduled venting event that is expected to result in the release of more than 85,000 scf of natural gas. XNG shall notify the Department within two working days of any unscheduled venting event that results in the release of more than 85,000 scf of natural gas.
[06-096 C.M.R. ch. 115, BACT]

DONE AND DATED IN AUGUSTA, MAINE THIS 11th DAY OF MAY, 2022.

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-1142-71-A-N.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 4/11/2022

Date of application acceptance: 4/11/2022

Date filed with the Board of Environmental Protection:

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

