



DEPARTMENT ORDER

Irving Forest Products, Inc.
Aroostook County
Nashville Plantation, Maine
A-314-77-6-M

Departmental
Findings of Fact and Order
New Source Review
NSR #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 (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Irving Forest Products, Inc. (Irving) – Ashland Sawmill
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Revision
NAICS CODES	321912 (Cut Stock, Resawing Lumber, and Planing), 321113 (Sawmills), and 321999 (All Other Miscellaneous Wood Products Manufacturing)
NATURE OF BUSINESS	Wood Products
FACILITY LOCATION	1218 Portage Road, Nashville Plantation, ME 04732

B. NSR License Description

Irving Forest Products, Inc. (Irving) has requested a New Source Review (NSR) license to address the like-kind replacement of the facility's *existing* Fire Pump #1 (originally listed as Emergency Generator 1 in A-314-77-1-A, dated October 25, 2013) with a *remanufactured* engine that is the same make, model, and year of manufacture, and fires the same fuel as the original; this *remanufactured* unit will also be called Fire Pump #1. From this point on, Fire Pump #1 shall refer to the *remanufactured*, like-kind replacement engine unless otherwise noted.

C. Emission Equipment

The following equipment is addressed in this NSR License:

Fire Pump Engine

Equipment	Max. Heat Input Capacity (MMBtu/hr)	Max. Firing Rate (gal/hr)	Fuel Type, % sulfur	Manuf. Date	Install. Date
Fire Pump #1	1.7	12	Distillate Fuel, 0.0015%	1967	2018

Fire Pump #1 would take the place of the *existing* Fire Pump #1, would be the functional equivalent of the replaced emissions unit, and would not alter the basic design parameters of the original unit. Additionally, the replaced unit is required to be permanently disabled and is barred from operation per Condition (7)B. of NSR License A-314-77-1-A (dated October 25, 2013). Therefore, Fire Pump #1 meets the definition of replacement unit as defined in 40 C.F.R. § 51.165(a)(1)(xxi).

Per 40 C.F.R. § 51.165(a)(1)(vii)(B) a replacement unit, as defined in 40 C.F.R. § 51.165(a)(1)(xxi), is considered an existing emissions unit. This means that Fire Pump #1 is not considered “new” to this source, and thus would not trigger NSR permitting requirements for new emissions units.

The engine previously licensed as Fire Pump #1 (originally listed as Emergency Generator 1 in A-314-77-1-A, dated October 25, 2013) shall be removed from the license; however, the unit may remain on-site provided that the unit continues to remain inoperable per Condition (7)B. of A-314-77-1-A (dated October 25, 2013).

D. Definitions

Distillate Fuel means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;
- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

Replacement Unit. According to 40 C.F.R. § 51.165(a)(1)(xxi), *replacement unit* means an emissions unit for which all of the following criteria are met. No creditable emission reductions shall be generated from shutting down the existing emissions unit that is replaced.

- The emissions unit is a reconstructed unit within the meaning of 40 C.F.R. § 60.15(b)(1), or the emissions unit completely takes the place of an existing emission unit;
- The emissions unit is identical to or functionally equivalent to the replaced emissions unit;
- The replacement does not alter the basic design parameters (as discussed in 40 C.F.R. § 51.165(h)(2)) of the process unit; and
- The replaced emissions unit is permanently removed from the major stationary source, otherwise permanently disabled, or permanently barred from operation by a permit that is enforceable as a practical manner. If the replaced emissions unit is brought back into operation, it shall constitute a new emissions unit.

E. Application Classification

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

The application submitted by Irving does not violate any applicable federal or state requirements, does not reduce monitoring, reporting, testing, or recordkeeping requirements, and does not seek to modify a Best Available Control Technology (BACT) analysis.

The proposed revision will not change the facility's emission limits. Therefore, the NSR license amendment is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 Code of Maine Rules (C.M.R.) ch. 115. The procedures found in 06-096 C.M.R. ch. 115 can be utilized to process this application since the proposed revision is not prohibited by the Part 70 air emission license. An application to incorporate the requirements of this NSR license into the Part 70 air emission license shall be submitted no later than 12 months from commencement of the requested operation.

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 as well as for those sources located in designated non-attainment areas.

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. Fire Pump #1

Fire Pump #1 is rated at 1.7 MMBtu/hr and was originally manufactured in 1967. Fire Pump #1 fires distillate fuel at a maximum rate of 12 gallons/hour and exhausts through its own stack. The unit was previously unlicensed and rendered inoperable per Condition (7)B. of NSR License A-314-77-1-A (October 25, 2013) until being remanufactured and placed into service in December 2018 to replace the previously licensed Fire Pump #1 (originally licensed as Emergency Generator 1 in A-314-77-1-A, dated October 25, 2013) after it abruptly failed in November 2018.

Due to the remanufacturing of the engine, the date of manufacture came into question for the purposes of identifying applicable federal engine requirements. According to both New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations, this question is answered by comparing the fixed capital cost of all new and refurbished components of the remanufactured engine to the fixed capital cost required to purchase a comparable new unit. According to Power Products Systems, LLC, the supplier of comparable remanufactured units, the cost of a remanufactured replacement motor is \$26,520.00; while the fixed capital costs incurred for new and refurbished components of Fire Pump #1 totaled \$11,578.59. Although the estimate received by Irving was not for a new engine, it is considered to be a conservatively low estimate for what the cost of a comparable, brand-new replacement unit would be. Using the estimate provided by Power Products Systems, LLC, the cost of new and refurbished components for Fire Pump #1 is less than 50% of the cost to construct a comparable new unit.

As previously established, Fire Pump #1 is considered a replacement unit and, due to this categorization, is considered to be an existing unit instead of a new unit. As an existing unit, Fire Pump #1 is not required to undergo a BACT analysis; alternatively, Fire Pump #1 shall be subject to the requirements of the unit it is replacing, as established in NSR License A-314-77-1-A (dated October 25, 2013). Given the fact that Fire Pump #1 is the same make, model, and year of manufacture and fires the same fuel as the unit it is replacing, the Department finds these requirements to be appropriate for Fire Pump #1.

1. NSPS: 40 C.F.R. Part 60, Subpart IIII

Fire Pump #1 was manufactured prior to the applicability dates of *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, 40 C.F.R. Part 60, Subpart IIII. According to the definition of “date of manufacture” in 40 C.F.R. § 60.4219, the date of manufacture for a reconstructed engine is the date of original manufacture unless the fixed capital cost of all new and refurbished components is greater than 75% of the fixed capital cost of an entirely new unit. As previously established, the cost of remanufacturing Fire Pump #1 is less than 50% of the cost of an entirely new unit; therefore, Fire Pump #1 is not subject to 40 C.F.R. Part 60, Subpart IIII. [40 C.F.R. §§ 60.4200 & 60.4219]

2. NESHAP: 40 C.F.R. Part 63, Subpart ZZZZ

The federal regulation *NESHAP for Stationary Reciprocating Internal Combustion Engines*, 40 C.F.R. Part 63, Subpart ZZZZ is applicable to Fire Pump #1. According to the definition of “reconstruction” provided in 40 C.F.R. § 63.2, because the fixed capital cost of new and refurbished components in this remanufactured unit is less than 50% of the fixed capital cost required to construct a comparable new unit, the remanufactured engine is considered an existing unit under NESHAP regulations. Therefore, Fire Pump #1 is considered an existing, emergency stationary reciprocating internal combustion engine (RICE) at an area HAP source and is not subject to NSPS regulations. EPA’s August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE*) specifically does not exempt this unit from the federal requirements. [40 C.F.R. §§ 63.2 & 63.6585]

The criteria and requirements of 40 C.F.R. Part 63, Subpart ZZZZ applicable to Fire Pump #1 are included below.

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 63, Subpart ZZZZ, a stationary reciprocating internal combustion engine (RICE) is considered an **emergency** stationary RICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under 40 C.F.R. Part 63, Subpart ZZZZ, resulting in the engine being subject to requirements applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster or equipment failure;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

- (i) An emergency engine may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE more than 100 hours per calendar year.
- (ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

Fire Pump #1 shall be limited to the usage outlined in 40 C.F.R. § 63.6640(f) and therefore may be classified as an existing emergency stationary RICE as defined in 40 C.F.R. Part 63, Subpart ZZZZ. Failure to comply with all of the requirements listed in 40 C.F.R. § 63.6640(f) may cause this engine to not be considered an emergency engine and therefore subject to all applicable requirements for non-emergency engines.

b. 40 C.F.R. Part 63, Subpart ZZZZ Requirements

(1) Operation and Maintenance Requirements

Unit Type	Operating Limitations
Compression ignition (distillate fuel) units	<ul style="list-style-type: none">- Change oil and filter every 500 hours of operation or annually, whichever comes first;- Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The engine shall be operated and maintained according to the manufacturer's emission-related written instructions, or Irving shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 C.F.R. §§ 63.6603(a) & 63.6625(e) and 40 C.F.R. Part 63, Subpart ZZZZ, Table 2d]

(2) Optional Oil Analysis Program

Irving has the option of utilizing an oil analysis program which complies with the requirements of 40 C.F.R. § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, Irving must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 C.F.R. § 63.6625(i)]

(3) Non-Resettable Hour Meter Requirement

A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 63.6625(f)]

(4) Startup Idle and Startup Time Minimization Requirements

During periods of startup, Irving must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) and 40 C.F.R. Part 63, Subpart ZZZZ, Table 2d]

(5) Annual Time Limit for Maintenance and Testing

As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). [40 C.F.R. § 63.6640(f)]

(6) Recordkeeping

Irving shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 63.6655(f)]

3. BPT Emission Limits

The BPT emission limits for Fire Pump #1 are based on the following:

PM/PM ₁₀	- 0.31 lb/MMBtu from AP-42, Table 3.3-1, dated 10/96
SO ₂	- combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
NO _x	- 4.41 lb/MMBtu from AP-42, Table 3.3-1, dated 10/96
CO	- 0.95 lb/MMBtu from AP-42, Table 3.3-1, dated 10/96
VOC	- 0.36 lb/MMBtu from AP-42, Table 3.3-1, dated 10/96
Visible Emissions	- 06-096 C.M.R. ch. 115, BPT

The BPT emission limits for Fire Pump #1 are the following:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Fire Pump #1	0.52	0.52	0.003	7.36	1.59	0.60

Visible emissions from Fire Pump #1 shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time Irving may elect to comply with the following work practice standards in lieu of the numerical opacity limit:

- a. Irving shall maintain a log (written or electronic) of the date, time, and duration of all engine startups;
- b. The engine shall be operated in accordance with the manufacturer's emission-related operating instructions;
- c. Irving shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations shall apply; and
- d. The engine, including any associated air pollution control equipment, shall be operated at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Department that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the unit.

The Department has determined that the proposed BPT visible emission limit is more stringent than the applicable limit in 06-096 C.M.R. ch. 101. Therefore, the visible emission limit for Fire Pump #1 has been streamlined to the more stringent BPT limit, and only this more stringent limit shall be included in the air emission license.

4. Emission Limit Compliance Methods

Compliance with the emission limits associated with Fire Pump #1 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

5. Periodic Monitoring

For Fire Pump #1, Irving shall periodically monitor and record the information indicated in the following table:

Information	Units of Measure	Monitoring Tool/Method	Frequency
Distillate fuel sulfur content	Percent, by weight	Fuel receipts from supplier	As fuel delivery receipts are received
Operating time	Hours	Hour meter	Monthly and calendar year total
Type of operation (emergency, maintenance, etc.)	N/A	Recorded electronically or in logbook	As it occurs

C. Incorporation Into the Part 70 Air Emission License

The requirements in this 06-096 C.M.R. ch. 115 New Source Review license shall apply to the facility upon issuance. Per *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140, § 1.(C)(8), for a modification at the facility that has undergone NSR requirements or been processed through 06-096 C.M.R. ch. 115, the source must apply for an amendment to their Part 70 license within one year of commencing the proposed operations, as provided in 40 C.F.R. Part 70.5.

D. Annual Emissions

Total licensed annual emissions for the facility will not change as a result of this NSR license amendment.

III. AMBIENT AIR QUALITY ANALYSIS

Irving previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (see NSR License A-314-77-1-A, dated October 25, 2013). An additional ambient air quality analysis is not required for this NSR license amendment.

ORDER

The Department hereby grants NSR License Amendment A-314-77-6-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the standard and special conditions below.

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 (6) of NSR License A-314-77-1-A (October 25, 2013):

(6) Fire Pump #1

A. Allowable Operation

1. Fire Pump #1 is licensed to fire distillate fuel. [06-096 C.M.R. ch. 115, BPT]
2. Fire Pump #1 shall be limited to 100 hours of operating per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 115, BPT]

B. The distillate fuel sulfur content for Fire Pump #1 shall be limited to 0.0015% sulfur by weight (15 ppm). Compliance shall be demonstrated by fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 C.M.R. ch. 115, BPT]

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

Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Fire Pump #1	0.52	0.52	0.003	7.36	1.59	0.60

D. Visible emissions from Fire Pump #1 shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time Irving may elect to comply with the following work practice standards in lieu of the numerical opacity limit [06-096 C.M.R. ch. 115, BPT]:

1. Irving shall maintain a log (written or electronic) of the date, time, and duration of all engine startups;
2. The engine shall be operated in accordance with the manufacturer's emission-related operating instructions;
3. Irving shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations shall apply; and
4. The engine, including any associated air pollution control equipment, shall be operated at all times in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Department that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the unit.

E. Compliance Methods

Compliance with the emission limits associated with Fire Pump #1 shall be demonstrated in accordance with the appropriate test methods upon request of the Department. [06-096 C.M.R. ch. 115, BPT]

F. Periodic Monitoring

For Fire Pump #1, Irving shall periodically monitor and record the information indicated in the following table [06-096 C.M.R. ch. 115, BPT]:

Information	Units of Measure	Monitoring Tool/Method	Frequency
Distillate fuel sulfur content	Percent, by weight	Fuel receipts from supplier	As fuel delivery receipts are received
Operating time	Hours	Hour meter	Monthly and calendar year total
Type of operation (emergency, maintenance, etc.)	N/A	Recorded electronically or in logbook	As it occurs

G. Fire Pump #1 shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ including, but not necessarily limited to, the following:

1. Irving shall meet the following operational limitations for Fire Pump #1:
 - a. Change the oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c. Inspect the hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Records shall be maintained documenting compliance with the operational limitations.

[40 C.F.R. §§ 63.6603(a) & 63.6625(e), 40 C.F.R. Part 63, Subpart ZZZZ, Table 2d, and 06-096 C.M.R. ch. 115, BPT]

2. Oil Analysis Program Option

Irving has the option of utilizing an oil analysis program which complies with the requirements of 40 C.F.R. § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, Irving must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 C.F.R. § 63.6625(i)]

3. Non-Resettable Hour Meter

A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 63.6625(f)]

4. Maintenance, Testing, and Non-Emergency Operating Situations

- a. The engine shall be limited to 100 hrs/yr for maintenance checks and readiness testing. Up to 50 hrs/yr of the 100 hrs/yr may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written logs) of all engine operating hours. [40 C.F.R. § 63.6640(f) and 06-096 C.M.R. ch. 115, BPT]

- b. Irving shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. §§ 63.6655(e) and (f)]

5. Operation and Maintenance

The engine shall be operated and maintained according to the manufacturer's emission-related written instructions, or Irving shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

6. Startup Idle and Startup Time Minimization

During periods of startup, Irving must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) & 40 C.F.R. Part 63, Subpart ZZZZ, Table 2d]

The following Condition is new in this NSR license amendment:

- (1) Irving shall submit an application to incorporate this NSR license amendment into the facility's Part 70 air emission license no later than 12 months from commencement of the requested operation. [06-096 C.M.R. ch. 140, § 1.(C)(8)]

DONE AND DATED IN AUGUSTA, MAINE THIS 17 DAY OF April, 2019.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Alan Robert Corne for
GERALD D. REID, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: February 27, 2019
Date of application acceptance: February 28, 2019

Date filed with the Board of Environmental Protection:

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

