



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

Waste Management Disposal
Services of Maine, Inc.
Somerset County
Norridgewock, Maine
A-816-77-2-A

Departmental
Findings of Fact and Order
New Source Review
Amendment #2

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Waste Management Disposal Services of Maine, Inc. (WMDSM)
LICENSE TYPE	06-096 CMR 115 Minor Modification
NAICS CODES	562212
NATURE OF BUSINESS	Solid Waste Landfill
FACILITY LOCATION	Norridgewock, Maine
NSR AMENDMENT ISSUANCE DATE	March 10, 2010

B. Amendment Description

1. H₂S Testing Requirements

WMDSM New Source Review (NSR) Amendment #1 (A-816-77-1-A) requires WMDSM to test the landfill gas for H₂S on the following schedule per Condition (5)(F):

Once per business day utilizing either an in-line analyzer, laboratory analysis, or stain tubes. The frequency of H₂S monitoring shall be reduced to once weekly if the results of the daily testing are less than 1,000 ppm for 20 consecutive tests, and to once monthly if the results of the weekly testing are less than 500 ppm for eight consecutive tests. If the frequency of H₂S monitoring is reduced, upon request the Department may require H₂S testing to increase to once per business day. If the results of the H₂S testing remain consistently below 250 ppm, the Department may eliminate the requirement for H₂S testing. Compliance with applicable SO₂ limits shall be based on

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periodic laboratory determination of TRS levels and not the H₂S testing required in this paragraph.

WMDSM has submitted data for the daily H₂S sampling between March 16, 2009 and September 30, 2009. The average daily H₂S concentration for this period was 128 ppm (corrected to 50% methane). The testing for H₂S concentration was imposed as an indicator of SO₂ emissions but it is not used to determine compliance with the SO₂ emission limits. Therefore, WMDSM has requested the requirement to test for H₂S be removed from the license. WMDSM shall continue to perform testing for TRS. The schedule for TRS sampling has been included in Condition (5)(F).

2. TRS Testing Requirements

NSR Amendment #1 also includes requirements for sampling landfill gas for total reduced sulfur (TRS). TRS sampling is required on the following schedule per Condition (4)(H):

WMDSM shall sample landfill gas at the engine plant or flare inlet for TRS utilizing ASTM Method D5504, EPA Modified Method 16, or another method approved by the Department. If the monthly average of TRS in the landfill gas exceeds 1,250 ppm at 50% methane for two (2) consecutive months, WMDSM shall reassess BACT for SO₂ emissions from the landfill and submit the revised BACT analysis to the Department within 90 days.

Due to the relatively low levels of TRS in the landfill gas, WMDSM has requested additional flexibility for future testing. WMDSM has proposed reducing the testing frequency to quarterly after 12 consecutive tests below 1,000 ppm and reducing the testing frequency to annually after 4 consecutive quarterly tests below 500 ppm. The schedule for TRS sampling has been included in Condition (5)(F) and Condition (4)(H) has been amended to reflect this new schedule.

C. Application Classification

The application for WMDSM does not violate any applicable federal or state requirements and will not result in an increase of any regulated air pollutant. This application does seek to modify a Best Available Control Technology (BACT) analysis performed per New Source Review.

Therefore, this amendment is determined to be a minor modification under *Minor and Major Source Air Emission License Regulations* 06-096 CMR 115 (last amended December 24, 2005). This amendment will be incorporated into the Part

70 air emission license no later than 12 months from commencement of the requested operation.

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,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-816-77-2-A pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the standard and special conditions below.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

The following shall replace Condition (4)(H) of Air Emission License A-816-77-1-A:

- H. WMDSM shall sample landfill gas at the engine plant or flare inlet for TRS utilizing ASTM Method D5504, EPA Modified Method 16, or another method approved by the Department. If the average of TRS in the landfill gas exceeds 1,250 ppm at 50% methane during two (2) consecutive monitoring events, WMDSM shall reassess BACT for SO₂ emissions from the landfill and submit the revised BACT analysis to the Department within 90 days. [06-096 CMR 115, BACT]

The following shall replace Condition (5) of Air Emission License A-816-77-1-A:

(5) Monitoring Requirements

The following are identified as Periodic Monitors [06-096 CMR 115, BACT]:

- A. Maintenance performed on each engine (including coalescing filters);
- B. Monthly operating time for each engine;
- C. Monthly gas flow to the flares;
- D. Monthly gas flow to the engines;
- E. Purchase records for the auxiliary propane for the flares indicating quantity of propane purchased;
- F. Monthly sampling of the TRS concentration of the LFG. The frequency of TRS sampling shall be reduced to once quarterly if the results of the monthly sampling are less than 1,000 for 12 consecutive monthly monitoring events, and to once annually if the results of quarterly sampling are less than 500 ppm for 4 consecutive quarterly monitoring events. If the frequency of TRS sampling is reduced, upon request, the Department may require TRS sampling to increase to once per month.

DONE AND DATED IN AUGUSTA, MAINE THIS 10th DAY OF March, 2010.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *David P. Little*
DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 11/30/09

Date of application acceptance: 11/30/09

Date filed with the Board of Environmental Protection:

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

