

Maine Army National Guard)
Camp Keyes)
Kennebec County)
Augusta, Maine)
A-802-71-C-R)

**Departmental
 Findings of Fact and Order
 Air Emission License**

After review of the air emissions license renewal 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

1. Maine Army National Guard (Camp Keyes), of Augusta, Maine has applied to renew their Air Emission License permitting the operation of emission sources associated with their military facility.
2. Camp Keyes underwent a census of their licensed equipment inventory and this renewal will reflect updated equipment capacities and will include equipment that required permitting but had been previously overlooked.

B. Camp Keyes is applying to include the operation of the following equipment to its air emissions license:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type</u>	<u>Manufacture Date</u>	<u>Stack #</u>
Boiler #1	1.45	10.5 gal/hr	#2 Fuel Oil	2006	7A
Boiler #2	4.4	31.2 gal/hr	#2 Fuel Oil	1980	14/35A
Boiler #3	4.4	31.3 gal/hr	#2 Fuel Oil	1976	37A
Boiler #4A	1.4	10.0 gal/hr	#2 Fuel Oil	2006	39A
Boiler #4B	1.4	10.0 gal/hr	#2 Fuel Oil	2006	39A
Heater #1	7.0	52 scfm	Propane	1992	37B

Back-up Diesel Generator

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Power Output (kW)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>
DG #1	5.25	500	31.5	Diesel Fuel Oil, 0.05%

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C. Insignificant Activities

Camp Keyes makes use of several small boilers and propane heaters to satisfy heating and hot water needs for the facility's buildings. These units are under 1.0 MMBtu/hr heat input capacity and are therefore considered by the Department to be insignificant activities and are mentioned only for inventory purposes and will not be included in short term emission rate calculations. These units are not listed in the license but are included in the fuel capacity limits for the total facility's emissions calculations.

D. Application Classification

The application for air emission license renewal for Camp Keyes includes an amendment to include equipment capacity updates and will also include equipment that required permitting but had been previously overlooked. Therefore, the license is considered to be a renewal and an amendment. The amendment will not result in the licensing of increased emissions. This source is determined to be a minor source and has been processed as such.

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 CMR 100 (last amended December 1, 2005). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

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.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 CMR 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

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B. #2 Fuel Oil Fired Boilers

Camp Keyes was previously licensed to operate four small #2 fuel oil fired boilers. Two of the previously licensed boilers, Boilers #1 and #4 were replaced in 2006. Boiler #1 was replaced by an equal sized boiler that is now designated Boiler #1. Boiler #4 was replaced by two smaller boilers designated Boilers #4A and #4B. The maximum design heat input capacities of all of the other #2 fuel oil fired boilers has been re-evaluated and this license will reflect the corrected capacities.

Camp Keyes has applied to include five #2 fuel oil fired boilers to the facility's Air Emission License, designated Boilers #1, #2, #3, #4A and #4B. The boilers have maximum heat input capacities of 1.45, 4.4, 4.4, 1.4 and 1.4 MMBtu/hr, respectively. All of the #2 Fuel oil fired boilers are below the applicability threshold applicability and are therefore not subject to EPA New Source Performance Standards (NSPS) 40 CFR Subpart Dc, for boilers with a heat input of 10 MMBtu/hr greater and manufactured after June 9, 1989.

Camp Keyes was previously licensed to fire no greater than 200,000 gallons per year (gal/yr) of #2 fuel oil based on a twelve-month rolling total. Camp Keyes has not requested a change in the fuel limit, therefore Camp Keyes shall continue to be restricted to firing no greater than 200,000 gallons of #2 fuel oil in the facility's boiler units, based on a twelve-month rolling total. Camp Keyes was also previously licensed to firing #2 fuel oil with a sulfur content of no greater than 0.35% sulfur by weight. Due to Bureau of Air Quality policy changes in regards to licensed sulfur content restrictions for #2 fuel oil, all #2 fuel oil fired in the Camp Keyes boilers must meet the criteria in ASTM D396 for #2 fuel oil. To demonstrate compliance with the annual fuel restriction, Camp Keyes shall maintain a fuel use log that shows the twelve-month rolling total fuel use and includes fuel purchase receipts indicating fuel purchase dates, fuel purchase amounts and ASTM verification.

Boilers #2 and #3 were installed in 1980 and 1976, respectively. A summary of the BPT analysis for Boilers #2 and #3 is as follows:

1. *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103, (last amended November 3, 1990) regulates PM emission limits. However, the PM emission limit of 0.12 lb/MMBtu when firing #2 fuel oil is more stringent and shall be considered BACT. PM₁₀ emission limits are derived from PM limits.
2. SO₂ emissions limits are based on the firing of #2 fuel oil which meets the criteria in ASTM D396 for #2 fuel oil.

3. NO_x, CO and VOC emission limits calculations are based upon factors used in the facility's previous air emission license.
4. Visible emissions from each stack are subject to *Visible Emissions Regulation*, 06-096 CMR 101 (last amended May 18, 2003). Visible emissions from each stack shall not exceed 20% opacity on a six-minute block average except, for no more than 2 six-minute block averages in a 3-hour period.

Boilers #1, #4A and #4B were installed in 2007, therefore it is required that emissions are receiving BACT. A summary of the BACT analysis for Boilers #1, #4A and #4B is as follows:

1. 06-096 CMR 103 regulates PM emission limits. However, the PM emission limit of 0.08 lb/MMBtu when firing #2 fuel oil is more stringent and shall be considered BACT. PM₁₀ emission limits are derived from PM limits.
2. SO₂ emissions limits are based on the firing of #2 fuel oil which meets the criteria in ASTM D396 for #2 fuel oil.
3. The BACT emission factor for NO_x emission limits calculations for #2 fuel oil fired in Boilers #1, #4A and #4B is 0.3 lb/MMBtu.
4. CO and VOC emission limits are based upon AP-42 data dated 9/98.
5. Visible emissions from each boiler stack are subject to 06-096 CMR 101. Visible emissions from each stack shall not exceed 20% opacity on a six-minute block average except, for no more than 2 six-minute block averages in a 3-hour period.

C. Propane Heater

Camp Keyes makes use of a propane heater, designated PH #1, to provide heat to the facility's paint booth during painting operations. PH#1 has a maximum heat input capacity of 7.0 MMBtu/hr firing propane. The unit was constructed and installed in 1992. PH#1 is below the applicability threshold and is therefore not subject to EPA New Source Performance Standards (NSPS) 40 CFR Subpart Dc, for boilers with a heat input of 10 MMBtu/hr greater and manufactured after June 9, 1989.

A summary of the BPT analysis for PH#1 is as follows:

1. 06-096 CMR 103 regulates PM emission limits. However, the PM emission limit of 0.05 lb/MMBtu when firing propane is more stringent and shall be considered BACT. PM₁₀ emission limits are derived from PM limits.
2. SO_x, NO_x, CO and VOC emission limits are based upon AP-42 data dated 10/96.
3. Visible emissions from the PH#1 stack shall not exceed 10% opacity based on a six-minute block average.

D. Back-up Diesel Generator

Camp Keyes makes use of a back-up diesel generator to provide power to the facility in the event of an unforeseen power loss at the facility. The diesel generator, designated DG #1, has a power output capacity of approximately 540 kW (750 HP) firing diesel fuel at a rate of 31.5 gallons per hour (gal/hr).

Traditionally, back-up generators (also called emergency generators) are restricted to only operating for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. Camp Keyes has requested that this permit expand this operational restriction to include periods during which ISO New England has requested that the facility operate the diesel generator under the Demand Response Program.

Due to the potential for tight electricity supplies, ISO New England has implemented the Demand Response Program. This program offers financial incentives to customers, such as Camp Keyes, to reduce electricity demand during peak periods which can reduce the necessity for ISO New England to take drastic measures, such as brown outs. In order for Camp Keyes to participate in this program, they will need to start and run their generator prior to, or in lieu of, loss of off-site power. Camp Keyes will only operate in this manner if there is a documented request from ISO New England under their emergency OP-4 procedures. ISO New England's OP-4 is a procedure which establishes criteria and guidelines for actions during capacity deficiencies. OP-4 is implemented when there is determined to be a serious threat to the integrity of the bulk power system. Therefore, the Department has agreed to redefine the terms by which Camp Keyes can operate their diesel generator to include ISO New England OP-4 emergencies.

Camp Keyes shall be limited to operating DG #1 no more than 500 hours per year, based on a twelve-month rolling total. Additionally, Camp Keyes shall be limited to operating DG #1 no more than 50 hours per calendar year in response to an OP-4 emergency. To demonstrate compliance with the hours of operation limit, Camp Keyes shall install an hour meter on DG #1 and maintain a written log documenting the dates, times and reason of operation for DG #1.

BPT for DG #1 requires the use of diesel fuel with a sulfur content of no greater than 0.05% sulfur by weight. Compliance with the fuel sulfur limit shall be demonstrated via fuel receipts from the supplier showing the quantity of fuel delivered and percent sulfur of the fuel.

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A summary of the BACT analysis for DG #1 is the following:

1. *Low Sulfur Fuel* 06-096 CMR 106 (last amended July 4, 1999) regulates fuel sulfur content, however in this case a BPT analysis for SO₂ determined a more stringent limit of 0.05% was appropriate and shall be used.
2. *Fuel Burning Equipment Particulate Emission Standard* 06-096 CMR 103 (last amended November 3, 1990) regulates PM emission limits. The PM₁₀ limits are derived from the PM limits.
3. NO_x, CO, and VOC emission limits are based upon AP-42 data dated 10/96 for large stationary diesel engines..
4. Visible emissions from DG #1 shall not exceed 20% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a continuous 3-hour period.

E. Liquid Volatile Organic Storage

Camp Keyes makes use of several above and below ground liquid volatile organic storage tanks. These tanks range in capacities from a few hundred gallons to 8,000 gallons. None of the tanks are large enough to be subject to EPA NSPS 40 CFR 60 Subpart Kb. None of the liquid volatile organic storage tanks at the facility are used for gasoline storage therefore none of the tanks are subject to Maine's rule *Gasoline Dispensing Facilities Vapor Control*, 06-096-CMR 118.

F. Existing Process Equipment

Camp Keyes makes use of a spray paint booth for painting of various military vehicles. The paint booth has been designed and constructed to minimize employee exposure to solvents and to minimize volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions to the outside air. The booth is equipped with an updraft air circulation system. When in use, air flows into the spray booth via ductwork, then the air is exhausted through particulate filters located in the booth's ceiling. The propane-fired heating unit is fired whenever spray painting operations are undertaken in the booth. It is used to heat the booth to a sufficient temperature for painting.

Camp Keyes makes use of various types of coatings, including non-VOC coatings. Historically, VOC emissions from the spray booth operation have amounted to approximately 2,000 pounds (1 ton) per year of VOC from the operation of the paint booth, without consideration of any control technologies. Camp Keyes expects to have greater through-put for the spray booth in the future and anticipates VOC emissions from this operation to increase to approximately 3,000 pounds (1.5 tons) per year as well as approximately 300 pounds per year of HAPs.

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The facility's previous Air Emission License had stated that the spray booth activities at Camp Keyes are subject to Maine's rule *Surface Coating Facilities* 06-096 CMR 129 (last amended March 3, 1998). However, 06-096 CMR 129 specifically exempts the refinishing of automobile, light duty truck and heavy duty truck refinishing. Therefore, the Department has determined that the spray booth operation at Camp Keyes is not subject to 06-096 CMR 129.

Camp Keyes has an effective record keeping program for the monitoring of coating use and VOC and HAP emissions from the spray booth operation. This record keeping program complies with the requirements of 06-096 CMR 129, Subsection 7(B). BPT for the spray booth operation shall be continued record keeping in accordance with the facility's current record keeping program.

Camp Keyes also has an effective control device maintenance, inspection and filter replacement program for the fabric filter particulate control system. BPT for the spray booth operation shall be the continued performance of the maintenance, inspection and filter replacement in accordance with the facility's current program.

Visible emissions from the spray booth particulate filter exhaust shall not exceed 5% opacity on a 6-minute block average.

G. Parts Washers

Camp Keyes makes use of three 30-gallon parts washers. The parts washers currently utilize mineral spirits as a cleaning medium. Camp Keyes shall maintain a record of solvent use that shall include the amount of solvent added to the parts washers and the dates that the solvent was added. The record shall be maintained on a monthly and a twelve-month rolling total basis. For purposes of record keeping, the amount of solvent used shall be considered as the difference between the amount of solvent added and the amount of solvent removed. If, in the future, Camp Keyes switches to a solvent that contains 1% VOC or less for use in the parts washers, to satisfy record keeping requirements Camp Keyes need only keep a copy of the MSDS sheet that demonstrates the VOC content of the solvent on file at the Camp Keyes facility.

1. In accordance with Maine's rule Solvent Degreasers, 06-096 CMR 130 (last amended June 28, 2004), Section 3A, Camp Keyes shall equip the parts washers with the following:
 - a. Equip the parts washer units with a cover that can be operated with one hand if vapor pressure >15 mmHG at 100°F, if the solvent is agitated or if the solvent is heated.

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- b. Equip the parts washer with an internal drainage basket so that parts are under the cover while draining if the solvent true vapor pressure > 32 mmHG at 100°F , except that the drainage basket may be external where an internal basket cannot fit into the degreaser.
 - c. Affix the parts degreasing units with a permanent conspicuous label summarizing the following operating standards:
 - Close cover when not in use,
 - Drain cleaned parts for at least 15 seconds or until dripping ceases,
 - If applicable, solvent spray must be a solid fluid stream and shall not exceed a pressure of 10 pounds per square inch gauge (psig),
 - Do not degrease porous or absorbent materials,
 - Do not operate degreaser if draft is greater than 131.2 feet per minute (ft/min) as measured between 3.28 and 6.56 feet upwind and at the same elevation as the tank lip), and
 - Do not operate degreaser upon occurrence of any visible leak until such leak is repaired.
2. In accordance with 06-096 CMR 130, Section 3A, Camp Keyes shall follow operational standards when making use of the facility's parts washers.
 3. In accordance with 06-096 CMR 130, Section 3A, Camp Keyes shall implement one of the following control measures if the solvent true vapor pressure > 32 mmHG at 100°F or if the solvent is heated to above 120°F :
 - i. Freeboard height that gives a freeboard ratio (freeboard height divided by the smaller of the interior length, width or diameter) of greater than or equal to 0.7;
 - ii. Water cover at least 1 inch in depth (solvent shall be insoluble in and heavier than water); or
 - iii. Another system of equivalent control, such as refrigerated chiller or a carbon adsorber, approved by the Department and the Environmental Protection Agency (EPA). [MEDEP Chapter 130]

H. Wood Shop Cyclone

Camp Keyes makes use of a wood shop for construction of small office furniture. Wood dust from the wood shop equipment is captured via a dust collection system and is vented to the outside via a dust cyclone. Dust captured by the cyclone drops down into a barrel located beneath the cyclone.

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This cyclone was not previously included in the facility’s air emission license, therefore it is required that emissions are receiving BACT. As a requirement of BACT, Camp Keyes shall establish a program of cyclone inspection and maintenance. The program shall include periodic inspection of the cyclone to determine proper operation and periodic removal of the collected dust for the wood shop cyclone so that the dust level does not accumulate to a level that the cyclone is no longer effective.

Visible emissions from wood shop cyclone shall not exceed an opacity of 20% at the settling chamber exhaust on a 6-minute block average basis, except for no more than 1 six-minute block average in a 1-hour period.

I. Annual Emissions

- Annual facility emissions for the fuel burning equipment was calculated based on an annual fuel use restriction of 200,000 gal/yr #2 fuel oil, 8,760 hr/yr operation of PH#1 and 500 hr/yr operation of DG #1.
- Annual facility emissions totals also include VOC and HAP emissions from the spray booth operation.

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

Equipment	PM	PM₁₀	SO₂	NO_x	CO	VOC	Individual HAPs	Total HAPs
Oil Fired Boilers	1.7	1.7	7.1	7.0	0.5	0.03	-	-
PH#1	1.5	1.5	0.003	0.3	0.6	0.1	-	-
DG#1	0.2	0.2	0.07	4.2	1.1	0.1	-	-
Spray Booth	-	-	-	-	-	2.5	-	-
Total TPY	3.4	3.4	7.2	11.5	2.2	2.7	1.0	5.0

III. AMBIENT AIR QUALITY ANALYSIS

According to *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 1, 2005), the level of air quality analyses required for a minor source shall be determined on a case-by case basis. Based on the information available in the file, and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source. Based on the total facility emissions, the Camp Keyes is below the emissions level required for modeling and monitoring.

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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-802-71-C-R subject to the following conditions:

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.

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (Title 38 MRSA §347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in 06-096 CMR 115. [06-096 CMR 115]
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 CMR 115]
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]

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- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353.
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]
- (11) In accordance with the Department’s air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
 - (i) perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility’s normal process and operating conditions:
 - a. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 - b. pursuant to any other requirement of this license to perform stack testing.

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- (ii) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - (iii) submit a written report to the Department within thirty (30) days from date of test completion.
[06-096 CMR 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- (i) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
 - (ii) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - (iii) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions. [06-096 CMR 115]
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]

- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee’s compliance status. [06-096 CMR 115]

SPECIFIC CONDITIONS

- (16) Oil Fired Boilers (Boilers #1, #2, #3, #4A and #4B)
- A. Camp Keyes shall not exceed a total annual facility fuel cap of 200,000 gal/yr of #2 fuel oil based on a twelve-month rolling total. All #2 fuel oil fired in the Camp Keyes boilers must meet the criteria in ASTM D396 for #2 fuel oil. [06-096 CMR 115, BPT]
- B. Camp Keyes shall maintain a fuel use log that shows the twelve-month rolling total fuel use and includes fuel purchase receipts indicating fuel purchase dates, fuel purchase amounts and fuel sulfur content. [06-096 CMR 115, BPT]
- C. Boiler emissions shall not exceed the following:

Equipment		PM	PM₁₀	SO₂	NO_x	CO	VOC
Boiler #1	lb/hr	0.1	0.1	0.7	0.4	0.05	0.003
Boiler #2	lb/MMBtu	0.12	-	-	-	-	-
	lb/hr	0.5	0.5	2.2	2.2	0.2	0.01
Boiler #3	lb/MMBtu	0.12	-	-	-	-	-
	lb/hr	0.5	0.5	2.2	2.2	0.2	0.01
Boiler #4A	lb/hr	0.1	0.1	0.7	0.4	0.5	0.003
Boiler #4B	lb/hr	0.1	0.1	0.7	0.4	0.5	0.003

[06-096 CMR 115, BPT]

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D. Visible emissions from each boiler stack shall not exceed 20% opacity on a six-minute block average, except for no more than 2 six-minute block averages in a 3-hour period. [06-096 CMR 101]

(17) Propane Heater (PH#1)

A. Emissions from PH#1 shall not exceed the following:

Equipment		PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boiler #1	lb/hr	0.3	0.3	0.001	0.07	0.1	0.02

[06-096 CMR 115, BPT]

B. Visible emissions from the PH#1 stack shall not exceed 10% opacity based on a six-minute block average. [MEDEP Chapter 101]

(18) Back-up Diesel Generator (DG#1)

A. Camp Keyes shall be restricted to firing diesel fuel with a sulfur content of no greater than 0.05% sulfur by weight in DG #1. Compliance shall be based on fuel receipts from the supplier showing the quantity of fuel delivered and percent sulfur of the fuel. [MEDEP Chapter 115, BPT]

B. DG#1 shall only operate for maintenance purposes, for situations arising from sudden and reasonably unforeseeable events beyond the control of the source and ISO New England OP-4 emergencies. [MEDEP Chapter 115, BPT]

C. Camp Keyes shall be limited to operating DG #1 no more than 500 hours per year, based on a twelve-month rolling total. Additionally, Camp Keyes shall be limited to operating DG #1 no more than 50 hours per calendar year in response to an OP-4 emergency. [MEDEP Chapter 115, BPT]

D. The hour meter on DG#1 shall continue to be operated and maintained. [06-096 CMR 115, BPT]

E. Emissions from DG#1 shall not exceed the following:

Equipment		PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Diesel Unit #1	lb/hr	0.6	0.6	0.3	16.8	4.5	0.5

[06-096 CMR 115, BPT]

F. Visible emissions from the DG#1 stack shall not exceed 20% opacity on a six-minute block average, except for no more than 2 six-minute block averages in a 3-hour period. [06-096 CMR 101]

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(19) Paint Spray Booth

- A. Camp Keyes shall be restricted to no greater than 2.5 tons per year of VOC emissions from the spray booth operation. Camp Keyes shall also be restricted to emissions of no greater than 1.0 ton/yr of any individual HAP and no greater than 2.0 ton/yr of total HAP emissions from the spray booth operations. Compliance shall be demonstrated via the facility's record keeping program for the monitoring of coating use and VOC and HAP from the spray booth operation. [06-096 CMR 115, BPT]
- B. Camp Keyes shall continue to maintain record keeping in accordance with the facility's current record keeping program which includes recording the amount of paint used and the VOC and HAP content of the paint as well as recording the amount of use of solvents associated with the spray booth operations and the VOC and HAP content of those solvents. [06-096 CMR 115, BPT]
- C. Visible emissions from the spray booth particulate filter exhaust shall not exceed 5% opacity on a 6-minute block average. [06-096 CMR 101]
- D. Camp Keyes shall continue the performance of the facility's current maintenance, inspection and filter replacement program. [06-096 CMR 115, BPT]

(20) Parts Washers

- A. In accordance with 06-096 CMR 130, Section 3A, Camp Keyes shall follow equipment and operational standards when making use of the parts washers. [06-096 CMR 130]
- B. In accordance with 06-096 CMR 130section 3A, Camp Keyes shall equip the parts washers unit with the following:
 - 1. Equip the parts washer with a cover that can be operated with one hand if vapor pressure >15 mmHG at 100°F, if the solvent is agitate or if the solvent is heated. [06-096 CMR 130]
 - 2. Equip the parts washer with an internal drainage basket so that parts are under the cover while draining if the solvent true vapor pressure > 32 mmHG at 100°F, except that the drainage basket may be external where an internal basket cannot fit into the degreaser. [06-096 CMR 130]

3. Affix the parts washer with a permanent conspicuous label summarizing the following operating standards:

- Close cover when not in use,
- Drain cleaned parts for at least 15 seconds or until dripping ceases,
- If applicable, solvent spray must be a solid fluid stream and shall not exceed a pressure of 10 pounds per square inch gauge (psig),
- Do not degrease porous or absorbent materials,
- Do not operate degreaser if draft is greater than 131.2 feet per minute (ft/min) as measured between 3.28 and 6.56 feet upwind and at the same elevation as the tank lip), and
- Do not operate degreaser upon occurrence of any visible leak until such leak is repaired. [06-096 CMR 130]

C. In accordance with 06-096 CMR 130 section 3A, Camp Keyes shall implement one of the following control measures if the solvent true vapor pressure > 32 mmHG at 100°F or if the solvent is heated to above 120°F:

- i. Freeboard height that gives a freeboard ratio (freeboard height divided by the smaller of the interior length, width or diameter) of greater than or equal to 0.7;
- ii. Water cover at least 1 inch in depth (solvent shall be insoluble in and heavier than water); or
- iii. Another system of equivalent control, such as refrigerated chiller or a carbon adsorber, approved by the Department and the Environmental Protection Agency (EPA). [06-096 CMR 130]

D. Camp Keyes shall maintain a record of solvent use for the parts washers. The record shall include solvent added and removed, the dates when solvent is added and the volume of solvent added and removed and the VOC content of the solvent. If, in the future, Camp Keyes switches to a solvent that contains 1% VOC or less for use in the parts degreaser, to satisfy record keeping requirements Camp Keyes need only keep a copy of the MSDS sheet that demonstrates the VOC content of the solvent on file at the Camp Keyes facility. [MEDEP Chapter 115, BPT]

(21) Wood Shop Cyclone

A. Camp Keyes shall establish a program of cyclone inspection and maintenance, which shall include periodic inspection of the cyclone to determine proper operation and periodic removal of the collected dust for the wood shop cyclone.

Maine Army National Guard)
Camp Keyes)
Kennebec County)
Augusta, Maine)
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B. Visible emissions from wood shop cyclone shall not exceed an opacity of 20% at the settling chamber exhaust on a 6-minute block average basis, except for no more than 1 six-minute block average in a 1-hour period.

(22) Camp Keyes shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (Title 38 MRSA §605-C).

DONE AND DATED IN AUGUSTA, MAINE THIS _____ DAY OF _____ 2008.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

The term of this Order shall be for five (5) years from the signature above

Date of initial receipt of application: **December 19, 2007**

Date of application acceptance: **December 21, 2007**

Date filed with the Board of Environmental Protection: _____

This Order prepared by, Peter G. Carleton, Bureau of Air Quality