STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

Marcou Construction Company, Inc.
Cumberland County
Westbrook, Maine
A-895-71-D-A (SM)

Departmental
Findings of Fact and Order
Air Emission License
Amendment #1

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 M.R.S.A., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

1. Marcou Construction Company, Inc. (Marcou), was issued Air Emission License A-895-71-C-R on 6 November 2009, permitting the operation of emission sources associated with their crushed stone and gravel facility.

2. Marcou has requested an amendment to their license to add a portable, 275 ton per hour, Telsmith Crusher with an integral 6 x 20 foot screen.

3. The equipment in this license is located at 737 Spring Street, Westbrook, ME.

B. Emission Equipment

Rock Crushers

Designation	Powered	Process Rate (tons/hour)	Date of Manu-facture	Control Device
Rock Crusher #4	Diesel #1	275	2001	Water Sprays
Screen #4*	Diesel #1	275	2001	Water Sprays

* Noted for inventory purposes only.

C. Application Classification

With the fuel limit on diesel Generator #1, the facility is licensed below the major source thresholds and is considered a synthetic minor.

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 regulations. The emission increases are determined by subtracting the current licensed emissions preceding the modification from the maximum future licensed allowed emissions, as follows:

Pollutant	Current License (TPY)	Future License (TPY)	Net Change (TPY)	Significance Level
PM	0.5	0.5	0	100
PM_{10}	0.5	0.5	0	100
SO_2	0.2	0.2	0	100
NO_x	13.3	13.3	0	100
CO	3.5	3.5	0	100
VOC	0.4	0.4	0	50
CO_2e	-	683	683	100,000

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

II. BEST PRACTICAL TREATMENT

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 (as amended). 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 CMR 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. Rock Crusher #4

Rock Crusher #4 is a Telsmith portable unit, manufactured in 2001 with a rated capacity of 275 tons per hour. Rock Crusher #4 is therefore subject to EPA New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart OOO for Nonmetallic Mineral Processing Plants manufactured after August 31, 1983, with capacities greater than 150 tons per hour for portable plants and greater than 25 tons per hour for non-portable plants.

Rock Crusher #4 has undergone an initial performance test and demonstrated compliance with required emissions levels at that time.

The regulated pollutant from the rock crushers is particulate emissions. To meet the requirements of Best Practical Treatment (BPT) for control of particulate matter (PM) emissions from the rock crushers, Marcou shall maintain water sprays on the rock crusher and operate as needed to control visible emissions. Visible emissions from the rock crusher shall be limited to no greater than 10% opacity on a six (6) minute block average basis.

C. Facility Emissions

1. Marcou shall be restricted to the following annual emissions, based on a 12-month rolling total and the annual fuel limit of 60,000 gallons of diesel fuel for the Generator #1:

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

	PM	PM_{10}	SO_2	NO_x	CO	VOC	CO_2e
Total TPY	**0.5**	**0.5**	**0.2**	**13.3**	**3.5**	**0.4**	**683**

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011 through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans,* 40 CFR Part 52, Subpart A, §52.21 Prevention of Significant Deterioration of Air Quality rule. "Greenhouse gases" as defined in 06-096 CMR 100 (as amended) means the aggregate group of the following gases: Carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Greenhouse gases (GHG) for purposes of licensing are calculated and reported as carbon dioxide equivalents (CO_2 e).

Based on the facility's fuel use limit(s), the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, Marcou is below the major source threshold of 100,000 tons of CO_2 e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

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-895-71-D-A, subject to the conditions found in Air Emission A-895-71-C-R, and in 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.

The following Specific Condition (24) shall be added to the license:

(24) **Rock Crusher #4**

A. Marcou shall install and maintain spray nozzles for particulate control on Rock Crusher #4 and operate them as necessary to limit visible emissions to no greater than 10% opacity on a six (6) minute block average basis. [06-096 CMR 115 (BPT) and 06-096 CMR 101]

B. Marcou shall maintain a log detailing and quantifying the hours of operation on a daily basis for the rock crusher. The operation log shall be kept on-site at the rock crushing location. [06-096 CMR 115, BPT]

C. Marcou shall maintain a log detailing the maintenance on particulate matter control equipment (including spray nozzles). Marcou shall perform monthly inspections of any water sprays to ensure water is flowing to the correct locations and initiate corrective action within 24 hours if water is found to not be flowing properly. Records of the date of each inspection and any corrective action required will be included in the maintenance log. The maintenance log shall be kept on-site at the rock crushing location. [06-096 CMR 115, BPT]

D. Marcou shall conduct a performance test at least once every five years. [06-096 CMR 115, BPT]

E. Marcou shall submit a test notice to the regional inspector at least 7 days prior to a performance test. [06-096 CMR 115, BPT]

F. The rock crusher is subject to 40 CFR Part 60 Subparts A and OOO, and Marcou shall comply with the notification and record keeping requirements of 40 CFR Part 60.676 and Part 60.7, except for Section (a)(2) of 60.7 per Subpart OOO, §60.676(h).

DONE AND DATED IN AUGUSTA, MAINE THIS 9th DAY OF April, 2012.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie Loyzim for
PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-895-71-C-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 03/02/2012
Date of application acceptance: 03/07/2012

Date filed with the Board of Environmental Protection:

This Order prepared by N. Lynn Cornfield, Bureau of Air Quality.

Filed
APR 10 2012
State of Maine
Board of Environmental Protection