

**Sargent Corporation
Penobscot County
Stillwater, Maine
A-942-71-B-A**

**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., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

1. Sargent Corporation (Sargent) based in Stillwater, Maine was issued Air Emission License A-942-71-A-N on June 21, 2006 permitting the operation of emission sources associated with their crushed stone and gravel facility.
2. Sargent has requested an amendment to their license in order to add a second permanent crusher, to add a temporary rental crusher, and to revise the process rate of the existing crusher.

B. Emission Equipment

Rock Crushers

<u>Designation</u>	<u>Powered</u>	<u>Process Rate (tons/hour)</u>	<u>Date of Manufacture</u>	<u>Control Device</u>
#81013 Komatsu 550	Diesel #1	300 ¹	2005	Spray Nozzles
#81015 Cedarapids Cobratrack 1100 ²	Diesel #2	300	2004	Spray Nozzles
#81016 (rental) Pegson 1300 Maxtrak ²	Diesel #3	300	2006	Spray Nozzles

¹This unit was previously licensed at 110 ton/hour. The correct maximum process rate is 300 ton/hour.

²These units are new to this license.

Diesel Units

<u>Source ID</u>	<u>Max. Capacity (MMBtu/hr)</u>	<u>Max. Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>
Diesel #1	2.2	16.0	diesel fuel, 0.05% sulfur
Diesel #2 ²	2.0	14.75	diesel fuel, 0.05% sulfur
Diesel #3 ² (rental)	3.2	23.4	diesel fuel, 0.05% sulfur

²These units are new to this license.

C. Application Classification

This amendment will not increase emissions of any pollutant. Therefore, 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 Chapter 100 of the Department regulations. 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 Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Rock Crushers

Rock Crushers #81013 and #81015 are portable units with rated capacities of 300 ton/hour each. These crushers are therefore subject to EPA New Source Performance Standards (NSPS) Subpart OOO for Nonmetallic Mineral Processing Plants manufactured after August 31, 1983, with capacities greater than 150 tons/hr for portable plants and greater than 25 tons/hr for non-portable plants.

Rock Crusher #81016 is a portable unit with a rated capacity of 300 ton/hour. This is a rental unit that Sargent plans to operate for less than 3 months. If Sargent decides to operate Crusher #81016 past August 15, 2007, a license amendment will be required to address NSPS requirements.

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, Sargent shall maintain water sprays on the rock crushers and operate as needed to control visible emissions. Visible emissions from the rock crushers shall be limited to no greater than 10% opacity on a six (6) minute block average basis.

C. Diesel Units

Diesels #1, #2, and #3 are utilized primarily to provide power to the rock crushers.

A summary of the BACT analysis for Diesel #1, Diesel #2, and Diesel #3 is the following:

1. The total fuel use for the diesels shall not exceed 15,000 gallons per calendar year of diesel fuel with a maximum sulfur content not to exceed 0.05% by weight.
2. Chapter 106 regulates fuel sulfur content, however in this case a BACT analysis for SO₂ determined a more stringent limit of 0.05% was appropriate and shall be used.
3. The PM and PM₁₀ limits are derived from Chapter 103.
4. NO_x, CO, and VOC emission limits are based upon AP-42 data dated 10/96.
5. Visible emissions from Diesel #1 and Diesel #2 shall each not exceed 20% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period.

D. Facility Emissions

Sargent shall be restricted to the following annual emissions, based on a calendar year:

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

	PM	PM₁₀	SO₂	NO_x	CO	VOC
Diesels	0.1	0.1	0.1	4.5	1.0	0.4
Total TPY	0.1	0.1	0.1	4.5	1.0	0.4

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-942-71-B-A, subject to the conditions found in Air Emission A-942-71-A-N 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 shall replace Condition (16) of air emission license A-942-71-A-N:

(16) Rock Crushers

- A. Sargent is licensed to operate rock crusher #81016 only until August 15, 2007. In order to continue operation beyond this date, Sargent shall apply to amend their license to address NSPS requirements. [MEDEP Chapter 115, BPT]
- B. Sargent shall maintain spray nozzles for particulate control on rock crushers #81013, #81015, #81016 and operate them as necessary to limit visible emissions to no greater than 10% opacity on a six (6) minute block average basis. [MEDEP Chapters 115 (BPT) and 101]
- C. Sargent shall maintain a log detailing the maintenance on the water spray nozzles. The maintenance log shall be kept on-site at the rock crushing location. [MEDEP Chapter 115, BPT]
- D. Sargent shall maintain a log detailing and quantifying the hours of operation on a daily basis for each of the rock crushers. The operation log shall be kept on-site at the rock crushing location. [MEDEP Chapter 115, BPT]

The following shall replace Condition (17) of air emission license A-942-71-A-N:

(17) **Diesel Units**

A. Total fuel use for Diesel #1, Diesel #2, and Diesel #3 shall not exceed 15,000 gallons per calendar year of #2 fuel oil with a maximum sulfur content not to exceed 0.05% by weight. Compliance shall be based on fuel receipts from the supplier showing the quantity of fuel delivered and the percent sulfur of the fuel. [MEDEP Chapter 115, BPT]

B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Diesel #3	PM	0.12	MEDEP, Chapter 103, Section 2(B)(1)(a)

C. Emissions shall not exceed the following [MEDEP Chapter 115, BPT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Diesel #1	0.26	0.26	0.11	9.70	2.09	0.77
Diesel #2	0.24	0.24	0.10	8.91	1.92	0.71
Diesel #3	0.38	0.38	0.16	14.11	3.04	1.12

D. Visible emissions from Diesel #1, Diesel #2, and Diesel #3 shall each not exceed 20% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period. [MEDEP Chapter 101]

The following are New Conditions:

(24) **New Source Performance Standards for rock crushers**

A. Rock crushers #81013 and #81015 are subject to 40 CFR Part 60 Subparts A and OOO and Sargent 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).

- B. Sargent shall have an initial performance test performed on the rock crushing operations per the applicable sections of 40 CFR Part 60, Subpart OOO, §60.675. This consists of a certified Method 9 observation. The performance test shall be completed within 60 days after achieving the maximum production rate at which the unit will be operated, but no later than 180 days after initial startup of the unit. The initial performance tests shall take place in 2007. Sargent shall submit a test notice to the regional inspector at least 30 days prior to the performance test. Any rescheduled test requires a 7 day notice to the regional inspector.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2007.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-942-71-A-N

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 4/10/07

Date of application acceptance: 4/10/07

Date filed with the Board of Environmental Protection: _____

This Order prepared by Lynn Ross Bureau of Air Quality.