



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

**FMC Corporation,
Biopolymer Division
Knox County
Rockland, Maine
A-366-77-1-M**

**Departmental
Findings of Fact and Order
New Source Review**

After review of the air emissions license 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

FACILITY	FMC Corporation, Biopolymer Division
LICENSE TYPE	06-096 CMR 115, Minor Revision
NAICS CODES	2099, 2835
NATURE OF BUSINESS	Refined Hydrocolloid Products
FACILITY LOCATION	Crocketts Point, PO Box 308, Rockland, ME
NSR AMENDMENT ISSUANCE DATE	February 13, 2009

B. Amendment Description

FMC Corporation, Biopolymer Division (FMC) has requested an amendment to their Air Emission License in order to add an Emergency Generator to their Rockland facility.

C. Emission Equipment

The following equipment is addressed in this air emission license:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Date of Manufacture</u>	<u>Fuel Type</u>
Cummins Generator	1.54	10.9	1994	Diesel Fuel @ 0.05% Sulfur

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 760-3143

D. Application Classification

The application for FMC does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping. This application does not seek to modify a Best Available Control Technology (BACT) analysis performed per New Source Review.

Additionally, this application does not increase any currently established emission limits. Therefore, this application is determined to be a minor revision under *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 1, 2005) 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 06-096 CMR 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 CMR 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Cummins Generator

The Cummins Generator was manufactured in 1994 and is therefore not subject to New Source Performance Standards, Subpart IIII for Stationary Compression Ignition Internal Combustion Engines, or the National Emission Standard for Hazardous Air Pollutants, Subpart ZZZZ for Stationary Reciprocating Internal Combustion Engines.

Back-up generators are only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. Back-up generators are not to be used for prime power when reliable offsite power is available.

This generator is considered an insignificant activity for purposes of *Part 70 Air Emission License Regulations*, 06-096 CMR 140.

A summary of the BACT analysis for the Cummins Generator is the following:

1. The Cummins Generator shall fire only diesel fuel with a maximum sulfur content not to exceed 0.05% by weight.
2. The Cummins Generator shall be limited to 500 hr/yr of operation based on a 12 month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours.
3. 06-096 CMR 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.
4. A PM emission limit of 0.12 lb/MMBtu shall be considered BACT. The PM₁₀ limits are derived from the PM limits.
5. NO_x, CO, and VOC emission limits are based upon AP-42 data dated 10/96.
6. Visible emissions from the Cummins Generator shall 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.

III. AMBIENT AIR QUALITY ANALYSIS

FMC 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. An additional ambient air quality analysis is not required for this revision.

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-366-77-1-M 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.

Specific Conditions

(1) Cummins Generator

- A. FMC shall limit the Cummins Generator to 500 hr/yr of operation (based on a 12 month rolling total). An hour meter shall be maintained and operated on the Cummins Generator. [06-096 CMR 115, BACT]
- B. The Cummins Generator shall only be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. The Cummins Generator shall not to be used for prime power when reliable offsite power is available. A log shall be maintained documenting the date, time, and reason for operation. [06-096 CMR 115, BACT]
- C. The Cummins Generator shall fire diesel fuel with a sulfur limit not to exceed 0.05% by weight. Compliance shall be based on fuel records from the supplier showing the quantity of fuel delivered and the percent sulfur of the fuel. [06-096 CMR 115, BACT]
- D. Emissions shall not exceed the following [06-096 CMR 115, BACT]:

Emission Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Cummins Generator	0.18	0.18	0.08	6.79	1.46	0.54

- E. Visible emissions from the Cummins Generator shall 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. [06-096 CMR 101]

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- (2) FMC 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 (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 13th DAY OF February 2009.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brooks
DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 5/14/2008

Date of application acceptance: 5/23/2008

Date filed with the Board of Environmental Protection: _____

This Order prepared by Jonathan Voisine, Bureau of Air Quality.

