



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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**Naval Computer and
Telecommunications Area Master
Station Atlantic Detachment Cutler
Washington County
Cutler, Maine
A-210-70-D-R**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Renewal**

After review of the Part 70 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

FACILITY	Naval Computer and Telecommunications Area Master Station Atlantic Detachment (NCTAMS LANT DET)
RENEWAL LICENSE NUMBER	A-210-70-D-R
LICENSE TYPE	Part 70 Renewal
NAIC CODES	9711 National Security (Federal Facility) 4911 Electrical Power Generation 3443 Oil Storage Tanks
NATURE OF BUSINESS	Naval communications; electricity generation, space heating
FACILITY LOCATION	Route 191, Cutler, Maine

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

Boilers

<u>Emission Unit ID</u>	<u>Unit Capacity</u>	<u>Unit Type</u>	<u>Fuel, % sulfur</u>
VLF-103-B#6	6.4 MMBtu/hr	Boiler	diesel fuel, 0.05% S

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

BANGOR
106 HOGAN ROAD, SUITE 6
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 04679-2094
(207) 764-0477 FAX: (207) 760-3143

Stationary Internal Combustion Engines (SICE)

<u>Emission Unit ID</u>	<u>Heat* Input</u>	<u>Unit Output</u>	<u>Unit Type</u>	<u>Fuel, % sulfur</u>
VLF-103-D#1	29.3 MMBtu/hr	2750 kW	Electrical Generation	Diesel Fuel, 0.05% S
VLF-103-D#2	32.0 MMBtu/hr	3000 kW		
VLF-103-D#3	32.0 MMBtu/hr	3000 kW		
VLF-103-D#4	32.0 MMBtu/hr	3000 kW		
VLF-103-D#5	32.0 MMBtu/hr	3000 kW		
VLF-103-D#6	8.0 MMBtu/hr	750 kW		
HF-401-D#5	6.6 MMBtu/hr	620 kW	Emergency Electrical Generation	

* Heat input derived using known generator outputs, 138,000 Btu/gallon of diesel fuel, and an engine efficiency of 32%

NCTAMS LANT DET has additional insignificant activities which are not listed in the emission equipment table above but may be found in the Part 70 Renewal Application received by the Department on July 18, 2006.

C. Application Classification

The application for NCTAMS LANT DET does not include the licensing of increased emissions or the installation of new or modified equipment; therefore, the license is considered to be a renewal Part 70 License issued under 06-096 CMR 140 for a Part 70 source.

II. EMISSION UNIT DESCRIPTION

A. Facility Description

NCTAMS LANT DET is licensed to operate emission sources associated with their naval computer and communications center in Cutler, Maine. The license includes the High Frequency (HF) Antenna Array Area, the Very Low Frequency (VLF) Antenna Array Site, which includes the VLF Power Plant and the VLF Transmitter Area, and a fire station designated as Building 503. NCTAMS LANT DET is an active Naval Computer and Telecommunications Station staffed by civilian government workers for the operation of HF and VLF transmitters. NCTAMS LANT DET provides HF and VLF communications to the operating forces of the Atlantic Fleet and Northeast Region Shore Commands. NCTAMS LANT DET generates electricity from diesel engines and produces heat for space heating requirements.

<u>Site</u>	<u>Equipment</u>
VLF Antenna Array	VLF-103-B#6
	VLF-103-D#1
	VLF-103-D#2
	VLF-103-D#3
	VLF-103-D#4
	VLF-103-D#5
	VLF-103-D#6
General Administration	HF-401-D#5

B. VLF-103-B#6

VLF-103-B#6 was manufactured in 1996 with a maximum heat input capacity of 6.4 MMBtu/hr firing diesel fuel with a sulfur content not to exceed 0.05% by weight. The boiler is below the minimum NSPS Subpart Dc threshold of 10 MMBtu/hr and is therefore not subject to NSPS. Potential to emit for NO_x is less than 10.0 tons per year; therefore, this unit is exempt from NO_x RACT requirements.

Streamlining

1. Fuel sulfur content is regulated by 06-096 CMR 106; however, the BPT was determined in A-210-71-J-M (2/20/1998).
2. 06-096 CMR 101 is applicable for visible emissions; however, the BPT opacity limit was determined in A-210-70-A-I (1/14/2002).

Periodic Monitoring

1. Fuel use in VLF-103-B#6.
2. Percent sulfur of the fuel oil used in VLF-103-B#6.

Based on the type of fuel and operating in a manner consistent with good air pollution control practices, it is unlikely the boiler will exceed the opacity limit. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the Department is precluded from performing its own testing and may take enforcement action for any violations discovered.

C. National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart ZZZZ

The Diesel Engines are subject to the requirements of the NESHAP 40 CFR Part 63, Subpart ZZZZ, for stationary internal combustion engines. NCTAMS LANT DET shall comply with the recordkeeping, monitoring, and reporting requirements of Subpart ZZZZ by the applicable compliance dates, for each stationary diesel engine.

D. VLF-103-D#1

VLF-103-D#1 is a 2750 kW unit with a maximum heat input capacity of 29.3 MMBtu/hr firing diesel fuel with a maximum sulfur content of 0.05% by weight. This unit was manufactured prior to April 1, 2006, and has not been modified or reconstructed after July 11, 2005; therefore, it is not subject to 40 CFR Part 60, Subpart IIII requirements. An alternative NO_x RACT analysis was previously performed, and VLF-103-D#1 was determined to have met the requirements of NO_x RACT as specified in 06-096 CMR 138.

Streamlining

1. 06-096 CMR 106 regulates fuel sulfur content; however, the BPT sulfur limit was determined in A-210-70-B-A (3/18/2004).
2. 06-096 CMR 101 is applicable for visible emissions; the BPT opacity limit was determined in A-210-70-A-I (1/14/2002).

Periodic Monitoring

1. Fuel use in VLF-103-D#1.
2. Percent sulfur of the fuel oil used in VLF-103-D#1.

Based on the type and amount of fuel for which the diesel was designed, a properly maintained and operated diesel unit should not exceed opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing in accordance with 40 CFR Part 60, Appendix A, Method 9 is not required. However, neither the EPA nor the Department is precluded from performing its own testing and may take enforcement action for any violations discovered.

E. VLF-103-D#2, VLF-103-D#3, VLF-103-D#4 and VLF-103-D#5

VLF-103-D#2, VLF-103-D#3, VLF-103-D#4 and VLF-103-D#5 are identical 3000 kW units each with a maximum heat input capacity of 32.0 MMBtu/hr firing diesel fuel with a maximum sulfur content of 0.05% by weight. These units were manufactured prior to April 1, 2006, and have not been modified or reconstructed after July 11, 2005; therefore, they are not subject to 40 CFR Part 60, Subpart IIII requirements. Each of the engines is maintained with ignition timing retard for NO_x emissions control and are thus considered to be meeting the requirements of NO_x RACT as specified in 06-096 CMR 138.

Streamlining

1. 06-096 CMR 106 regulates fuel sulfur content; however, the BPT sulfur limit was determined in A-210-70-B-A (3/18/2004).
2. 06-096 CMR 101 is applicable for visible emissions; the BPT opacity limit was determined in A-210-70-A-I (1/14/2002).

Periodic Monitoring

1. Fuel use in VLF-103-D#2, VLF-103-D#3, VLF-103-D#4 and VLF-103-D#5.
2. Percent sulfur of the fuel oil used in VLF-103-D#2, VLF-103-D#3, VLF-103-D#4 and VLF-103-D#5.

Based on the type and amount of fuel for which the diesels were designed, properly maintained and operated diesel units should not exceed opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing in accordance with 40 CFR Part 60, Appendix A, Method 9 is not required. However, neither the EPA nor the Department is precluded from performing its own testing and may take enforcement action for any violations discovered.

F. VLF-103-D#6

VLF-103-D#6 is a 750 kW unit with a maximum heat input capacity of 8.0 MMBtu/hr firing diesel fuel with a maximum sulfur content of 0.05% by weight. This unit was manufactured prior to April 1, 2006, and has not been modified or reconstructed after July 11, 2005; therefore, it is not subject to 40 CFR Part 60, Subpart IIII requirements. An alternative NO_x RACT analysis was previously performed, and VLF-103-D#6 was determined to have met the requirements of NO_x RACT as specified in 06-096 CMR 138. Part of the NO_x RACT analysis was that for electrical power generating purposes at the VLF Antenna Array Site, only VLF-103-D#6 may be operated when peak plant load demand drops below 750 kW. Actual operations at the site have demonstrated that a variance to this requirement is warranted:

The transmitter load can vary to either side of 750 kW during periods of routine maintenance, equipment upgrades, or training. During this time, a main engine must be kept running to meet peak power demands. These occurrences shall not exceed 250 hours per calendar year.

NCTAMS LANT DET shall maintain records to document compliance with this condition and shall make the records available upon request by EPA or the Department. The duration and reason for operating under an exception shall be documented and submitted as part of the semi-annual report.

Streamlining

1. 06-096 CMR 106 regulates fuel sulfur content; however, the BPT sulfur limit was determined in A-210-70-B-A (3/18/2004).
2. 06-096 CMR 101 is applicable for visible emissions; the BPT opacity limit was determined in A-210-70-A-I (1/14/2002).

Periodic Monitoring

1. Fuel use in VLF-103-D#6.
2. Percent sulfur of the fuel oil used in VLF-103-D#6.

Based on the type and amount of fuel for which the diesel was designed, a properly maintained and operated diesel unit should not exceed opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing in accordance with 40 CFR Part 60, Appendix A, Method 9 is not required. However, neither the EPA nor the Department is precluded from performing its own testing and may take enforcement action for any violations discovered.

G. HF-401-D#5

HF-401-D#5 is a 620 kW emergency generator with a maximum heat input capacity of 6.6 MMBtu/hr firing diesel fuel with a maximum sulfur content of 0.05% by weight. This unit was manufactured prior to April 1, 2006, and has not been modified or reconstructed after July 11, 2005; therefore, it is not subject to 40 CFR Part 60, Subpart III requirements. An alternative NO_x RACT analysis was previously performed, and HF-401-D#5 was determined to have met the requirements of NO_x RACT as specified in 06-096 CMR 138.

Streamlining

1. 06-096 CMR 106 regulates fuel sulfur content; however, the BPT sulfur limit was determined in A-210-70-B-A (3/18/2004).
2. 06-096 CMR 101 is applicable for visible emissions; the BPT opacity limit was determined in A-210-70-A-I (1/14/2002).

Periodic Monitoring

1. Fuel use in HF-401-D#5.
2. Percent sulfur of the fuel oil used in HF-401-D#5.

Based on the type and amount of fuel for which the diesel was designed, a properly maintained and operated diesel unit should not exceed opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing in accordance with 40 CFR Part 60, Appendix A, Method 9 is not required. However, neither the EPA nor the Department is precluded from performing its own testing and may take enforcement action for any violations discovered.

H. Degreaser Unit

The degreaser unit has a design capacity of 30 gallons and uses diesel fuel as a solvent.

Periodic Monitoring

Periodic monitoring for the degreaser units shall consist of record keeping including records of solvent added and removed.

I. Fugitive Emissions

Fugitive particulate matter sources at NCTAMS LANT DET consist of roadways.

Periodic Monitoring

Based on best management practices, fugitive emission sources should not exceed the opacity limits. Therefore, periodic monitoring for opacity in the form of visible emission testing is not required. However, neither the EPA nor the Department is precluded from performing its own testing and may take enforcement action for any violations discovered.

J. Facility Emissions

The following total licensed annual emissions for the facility are based on the following raw materials used. All usages are based on a 12-month rolling total.

- 300,000 gallons per year diesel fuel, 0.05% sulfur by weight maximum, in VLF-103-B#6.
- 2,504,221 gallons per year diesel fuel, 0.05% sulfur by weight maximum, in HF-401-D#5, VLF-103-D#1, VLF-103-D#2, VLF-103-D#3, VLF-103-D#4, VLF-103-D#5, and VLF-103-D#6 (combined).

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

Pollutant	Boiler	Diesels	Total Tons/year
PM	2.5	34.6	37.1
PM ₁₀	2.5	34.6	37.1
SO ₂	1.1	8.8	9.9
NO _x	4.0	552.9	556.9
CO	6.3	146.9	153.2
VOC	2.1	17.3	19.4

K. 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), are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

Based on the facility's fuel use limits, 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, NCTAMS LANT DET is below the major source threshold of 100,000 tons of CO₂e per year. Therefore, no additional licensing requirements are needed to address GHG emissions from this facility.

III. AMBIENT AIR QUALITY ANALYSIS

An ambient air quality analysis was performed in September 1996 and February 1998 to demonstrate emissions from the facility, in conjunction with other sources, did not violate ambient air quality standards. The ambient air quality analysis can be found in Air Emission License A-210-71-H-A, and an update may be found in Air Emission License A-210-71-J-M. An additional ambient air quality analysis is not required for this Part 70 License renewal. However, to demonstrate compliance with future standards, NCTAMS LANT DET will submit an updated analysis in conjunction with amendment A-210-77-A-1 or by December 1, 2012, whichever comes later.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this source

- will receive Best Practical Treatment;
- will not violate applicable emissions standards; and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-210-70-D-R pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to NCTAMS LANT DET pursuant to the Department's preconstruction permitting requirements in 06-096 CMR 108 or 06-096 CMR 115 have been incorporated into this Part 70 license, except for such conditions that the Department has determined are obsolete, extraneous, or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such, the conditions in this license supersede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 CMR 115 for making such changes and pursuant to the applicable requirements in 06-096 CMR 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

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 STATEMENTS

- (1) Approval to construct shall become invalid if the source has not commenced construction within eighteen 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 140]
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 CMR 140]
- (4) 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 140]
- (5) Notwithstanding any other provision 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 140]
- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
 - A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or affect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the applicant.

<u>Source</u>	<u>Citation</u>	<u>Description</u>	<u>Basis for Determination</u>
Facility	40 CFR Part 64	Compliance Assurance Monitoring	Not applicable. Units at the facility do not utilize pollution control equipment.
VLF-103-B#6	40 CFR Part 60, Subpart Dc	Standards of Performance for Small industrial-Commercial-Institutional Steam Generating Units	VLF-103-B#6 has a heat input less than 10.0 MMBtu/hr.
VLF-103-B#6	06-096 CMR 138	Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides (NO _x -RACT)	VLF-103-B#6 is not permitted to emit more than 10 tons per year of NO _x .
VLF-103-D#1 VLF-103-D#2 VLF-103-D#3 VLF-103-D#4 VLF-103-D#5 VLF-103-D#6 HF-401-D#5	40 CFR Part 60, Subpart III	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	Units were manufactured prior to April 1, 2006, and have not been modified or reconstructed after July 11, 2005.

[06-096 CMR 140, BPT]

- (7) The Part 70 license shall be reopened for cause by the Department or EPA prior to the expiration of the Part 70 license if:
- A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to 06-096 CMR 140;
 - B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
 - C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
 - D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license. [06-096 CMR 140]

- (8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading, and other similar programs or processes for changes that are provided for in the Part 70 license. [06-096 CMR 140]

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 and this license (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 Chapter 140; [06-096 CMR 140]
- (3) 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 140] **Enforceable by State-only**
- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.
- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; [06-096 CMR 140]
Enforceable by State-only
- (6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license; [06-096 CMR 140]
- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, 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 the

renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [06-096 CMR 140]

- (8) 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:

A. perform stack testing under circumstances representative of the facility's normal process and operating conditions:

1. 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;
2. to demonstrate compliance with the applicable emission standards; or
3. pursuant to any other requirement of this license to perform stack testing.

B. 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

C. submit a written report to the Department within thirty (30) days from date of test completion.

[06-096 CMR 140] **Enforceable by State-only**

- (9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

A. 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

B. 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

C. 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 140] **Enforceable by State-only**

- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to, malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is inconsistent with the terms and conditions of the air emission license.
- A. The licensee shall notify the Department within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;
- B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.
- Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.
- C. All other deviations shall be reported to the Department in the facility's semiannual report.
[06-096 CMR 140]
- (11) Upon the written request of 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 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 140]
- (12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [06-096 CMR 140]
- (13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
- (a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
- (b) The compliance status;

- (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (e) Such other facts as the Department may require to determine the compliance status of the source.
- [06-096 CMR 140]

SPECIAL CONDITIONS

(14) **VLF-103-B#6**

A. Emissions from VLF-103-B#6 shall not exceed the following limits:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	0.12	A-210-71-J-M (2/20/1998), 06-096 CMR 103	Federally Enforceable Through Title V Permit

<u>Pollutant</u>	<u>lb/hour</u>	<u>Origin and Authority</u>
PM	0.77	A-210-71-J-M (2/20/1998), 06-096 CMR 103
PM ₁₀	0.77	A-210-71-J-M (2/20/1998), BPT
SO ₂	0.32	A-210-70-B-A (3/18/2004), BPT
NO _x	1.22	A-210-71-F-A (7/25/1995), BPT
CO	1.92	
VOC	0.64	

B. Visible emissions from the stack serving VLF-103-B#6 shall not exceed 20% opacity on a six (6) minute block average basis. [A-210-70-A-I (1/14/2002), BPT]

(15) **VLF-103-D#1**

A. Emissions from VLF-103-D#1 shall not exceed the following limits:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	0.20	A-210-71-J-M (2/20/1998), 06-096 CMR 103	Federally Enforceable Through Title V Permit

<u>Pollutant</u>	<u>lb/hour</u>	<u>Origin and Authority</u>
PM	5.87	A-210-71-J-M (2/20/1998), 06-096 CMR 103
PM ₁₀	5.87	A-210-71-J-M (2/20/1998), BPT
SO ₂	1.5	A-210-70-B-A (3/18/2004), BPT
CO	24.93	
VOC	2.93	

B. Visible emissions from the stack serving VLF-103-D#1 shall not exceed an opacity of 20% on a six (6) minute block average basis, except for two (2) six (6) minute block averages in a 3-hour period. [A-210-70-A-I (1/14/2002), BPT]

(16) **VLF-103-D#2, VLF-103-D#3, VLF-103-D#4 and VLF-103-D#5**

A. Emissions from VLF-103-D#2, VLF-103-D#3, VLF-103-D#4 and VLF-103-D#5 each shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	A-210-71-J-M (2/20/1998), 06-096 CMR 103	Federally Enforceable Through Title V Permit

Pollutant	lb/hour	Origin and Authority
PM	6.40	A-210-71-J-M (2/20/1998), 06-096 CMR 103
PM ₁₀	6.40	A-210-71-J-M (2/20/1998), BPT
SO ₂	1.64	A-210-70-B-A (3/18/2004), BPT
CO	27.2	A-210-70-B-A (3/18/2004), BPT
VOC	3.2	A-210-70-B-A (3/18/2004), BPT

B. Visible emissions from the stacks serving VLF-103-D#2, VLF-103-D#3, VLF-103-D#4, VLF-103-D#5, and VLF-103-D#6 each shall not exceed an opacity of 20% on a six (6) minute block average basis, except for two (2) six (6) minute block averages in a 3-hour period. [A-210-70-A-I (1/14/2002), BPT]

(17) **VLF-103-D#6**

A. Emissions from VLF-103-D#6 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	A-210-71-J-M (2/20/1998), 06-096 CMR 103	Federally Enforceable Through Title V Permit

Pollutant	lb/hour	Origin and Authority
PM	1.60	A-210-71-J-M (2/20/1998), 06-096 CMR 103
PM ₁₀	1.60	A-210-71-J-M (2/20/1998), BPT
SO ₂	0.41	A-210-70-B-A (3/18/2004), BPT
CO	6.80	
VOC	0.80	

B. Visible emissions from the stacks serving VLF-103-D#6 shall not exceed an opacity of 20% on a six (6) minute block average basis, except for two (2) six (6) minute block averages in a 3-hour period. [A-210-70-A-I (1/14/2002), BPT]

(18) **HF-401-D#5**

A. Emissions from HF-401-D#5 shall not exceed the following limits:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	0.20	A-210-71-J-M (2/20/1998), 06-096 CMR 103	Federally Enforceable Through Title V Permit

<u>Pollutant</u>	<u>lb/hour</u>	<u>Origin and Authority</u>
PM	1.32	A-210-71-J-M (2/20/1998), 06-096 CMR 103
PM ₁₀	1.32	A-210-71-J-M (2/20/1998), BPT
SO ₂	0.34	A-210-70-B-A (3/18/2004), BPT
CO	5.62	
VOC	0.66	

B. Visible emissions from the stack serving HF-401-D#5 shall not exceed an opacity of 20% on a six (6) minute block average basis, except for two (2) six (6) minute block averages in a 3-hour period. [A-210-70-A-I (1/14/2002), BPT]

(19) **NO_x RACT requirements**

A. NO_x emissions from VLF-103-D#1, VLF-103-D#2, VLF-103-D#3, VLF-103-D#4, VLF-103-D#5, VLF-103-D#6, and HF-401-D#5 shall not exceed the 3.2 lb/MMBtu. [A-210-70-B-A (3/18/2004), BPT]

B. NO_x emissions from VLF-103-D#1, VLF-103-D#2, VLF-103-D#3, VLF-103-D#4, VLF-103-D#5, VLF-103-D#6, and HF-401-D#5 shall not exceed the following NO_x lb/hr emission limits:

Diesel Engine NO_x lb/hr Limits

<u>Equipment</u>	<u>NO_x lb/hr</u>	<u>Origin and Authority</u>
VLF-103-D#1	93.92	06-096 CMR 140, BPT
VLF-103-D#2	102.46	
VLF-103-D#3	102.46	
VLF-103-D#4	102.46	
VLF-103-D#5	102.46	
VLF-103-D#6	25.61	
HF-401-D#5	21.17	

C. NCTAMS LANT DET shall maintain timing retard to minimize NO_x emissions as recommended by the manufacturer on the units VLF-103-D#2, VLF-103-D#3, VLF-103-D#4, VLF-103-D#5 and VLF-103-D#6. [A-210-71-F-A (7/25/1995), 06-096 CMR 138]

- D. NCTAMS LANT DET shall perform stack testing for NO_x on VLF-103-D#1, VLF-103-D#2, VLF-103-D#3, VLF-103-D#4, VLF-103-D#5, VLF-103-D#6, and HF-401-D#5 within 12 months of the signing date on this License. NO_x stack testing shall then be performed once every three years for each unit. [06-096 CMR 140, BPT]
- E. NCTAMS LANT DET shall continuously monitor and record engine operational parameters to ensure optimal engine operation and minimize NO_x emissions. [06-096 CMR 140, BPT]
- F. For electrical power generating purposes at the VLF Antenna Array Site, only VLF-103-D#6 may be operated when peak plant load demand drops below 750 kW except during testing, routine maintenance, equipment upgrades, and training. These exceptions shall not exceed 250 hours per calendar year.

NCTAMS LANT DET shall maintain records to document compliance with this condition and shall make the records available upon request by EPA or the Department. The duration and reason for operating under an exception shall be documented and submitted as part of the semi-annual report. [06-096 CMR 140, BPT]

- (20) NCTAMS LANT DET shall only operate four of units VLF-103-D#2, VLF-103-D#3, VLF-103-D#4, VLF-103-D#5 and VLF-103-D#6 at any time (out of the maximum five) under normal operating scenarios, except as provided by Special Condition 19(F). However, NCTAMS LANT DET may operate all five of the units for short periods of time for emergency purposes (i.e., deicing) for no more than 500 hours per year. NCTAMS LANT DET shall record the time in hours that the units operate in this emergency mode, shall maintain records to document compliance with this condition, and shall make the records available upon request by EPA or the Department. [A-210-70-A-I (1/14/2002), 06-096 CMR 138]

(21) **National Emission Standards for Hazardous Air Pollutants (NESHAP)**

[40 CFR Part 63, Subpart ZZZZ, BPT]

The Diesel Engines are subject to the requirements of the NESHAP 40 CFR Part 63, Subpart ZZZZ, for stationary internal combustion engines. NCTAMS LANT DET shall comply with the recordkeeping, monitoring, and reporting requirements of Subpart ZZZZ by the applicable compliance dates for each stationary diesel engine.

NCTAMS LANT DET shall perform Ambient Air Dispersion Modeling for Criteria Air Pollutants in conjunction with amendment A-210-77-A-1 or by December 1, 2012, whichever comes later. [06-096 CMR 140]

(22) **Fuel Use**

- A. Fuel use in VLF-103-B#6 shall not exceed 300,000 gallons per year of low-sulfur (0.05% by weight) diesel fuel based on a 12-month rolling total. Compliance with

the fuel use limit shall be demonstrated by fuel use records kept on site. Compliance with the fuel sulfur content shall be demonstrated through purchase receipts indicating percent sulfur by weight. [06-096 CMR 140, BPT] **Enforceable by State-only**

- B. Combined fuel use in VLF-103-D#1, VLF-103-D#2, VLF-103-D#3, VLF-103-D#4, VLF-103-D#5, VLF-103-D#6, and HF-401-D#5 shall not exceed 2,504,221 gallons per year of low-sulfur (0.05% by weight) diesel fuel based on a 12-month rolling total. Compliance with the fuel use limit shall be demonstrated by fuel use records kept on site. Compliance with the fuel sulfur content shall be demonstrated through purchase receipts indicating percent sulfur by weight. [A-210-71-I-M (8/29/1997), BPT] **Enforceable by State-only**
- C. NCTAMS LANT DET shall not fire more than 133,000 gallons per year of low-sulfur (0.05% by weight) diesel fuel in VLF-103-D#6, based on a 12-month rolling total. Compliance with the fuel use limit shall be demonstrated by fuel use records kept on site. Compliance with the fuel sulfur content shall be demonstrated through purchase receipts indicating percent sulfur by weight. [A-210-70-A-I (1/14/2002), BPT] **Enforceable by State-only**
- (23) For the purpose of Standard Condition (1) of this license, the Department shall use appropriate procedures to gain access to the facility in accordance with national security guidelines. [A-210-71-E-R (7/31/1995), BPT]
- (24) **Fugitive Emissions**
Visible emissions from fugitive emission sources (including stockpiles and roadways) shall not exceed an opacity of 20%, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20% in any one (1) hour. [06-096 CMR 140, BPT]
- (25) **Degreaser Unit**
Parts washers that use a solvent degreaser containing greater than 5% VOC are subject to the operational and record keeping requirements of 06-096 CMR 130 which include, but are not limited to, the following:
- A. NCTAMS LANT DET shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 130]
- B. NCTAMS LANT DET shall equip each cold cleaning degreaser unit with a cover that is easily operated with one hand if [06-096 CMR 130]:
1. the solvent vapor pressure is greater than 15 millimeters of mercury measured at 100 °F by ASTM D323-89; or,
 2. the solvent is agitated; or,
 3. the solvent is heated.

- C. NCTAMS LANT DET shall attach a permanent conspicuous label to each cold cleaning degreaser unit summarizing the following operational standards [06-096 CMR 130]:
1. Close the covers on all solvent degreasing tanks when the tanks are not in use;
 2. Drain the cleaned parts for at least fifteen (15) seconds or until dripping stops;
 3. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized or shower-type spray) at a pressure that does not exceed ten (10) pounds per square inch gauge pressure (psig);
 4. Do not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
 5. Minimize drafts to less than 40 meters/minute; and
 6. Refrain from operating the cold cleaning degreaser upon the occurrence of any visible solvent leak until such leak is repaired.
- D. NCTAMS LANT DET shall not use any halogenated solvents in the degreasing tanks. [06-096 CMR 140, BPT]
- E. For those degreasers containing less than 5% VOC, NCTAMS LANT DET shall keep the degreasers' Material Safety Data Sheets (MSDS) on file. [06-096 CMR 140, BPT]
- (26) **Periodic Monitors** [06-096 CMR 140, BPT]
- A. Diesel engine emission testing results when performed.
 - B. VLF-103-B#6 diesel fuel use.
 - C. VLF-103-D#1, VLF-103-D#2, VLF-103-D#3, VLF-103-D#4, VLF-103-D#5, VLF-103-D#6, and HF-401-D#5 combined diesel fuel use.
 - D. VLF-103-D#6 diesel fuel use.
 - E. Certification the diesel fuel used in VLF-103-B#6, VLF-103-D#1, VLF-103-D#2, VLF-103-D#3, VLF-103-D#4, VLF-103-D#5, VLF-103-D#6, and HF-401-D#5 is on road diesel fuel.
 - F. Records of solvent added to, and removed from, the degreaser unit.
- (27) **Semiannual Reporting** [06-096 CMR 140, BPT]
- A. The licensee shall submit semiannual reports to the Department, due on **July 31st** and **January 31st** of each year, signed by facility's designated responsible official.
 - B. The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the Department within seven calendar days of the due date.
 - C. Each semiannual report shall include a summary of the periodic monitoring required by this license.

D. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

(28) **Annual Compliance Certification** [06-096 CMR 140, BPT]

NCTAMS LANT DET shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The annual compliance certification is due **January 31** of each year and shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the Department within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors.

(29) **Annual Emission Statement**

In accordance with *Emission* Statements, 06-096 CMR 137 (as amended), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of either

- A. A computer program and accompanying instructions supplied by the Department; or
- B. A written emission statement containing the information required in 06-096 CMR 137.

The emission statement must be submitted by the date as specified in 06-096 CMR 137. [06-096 CMR 137]

(30) The license is subject to the State and Federal regulations listed below:

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
06-096 CMR 102	Open Burning	-
06-096 CMR 109	Emergency Episode Regulation	-
06-096 CMR 110	Ambient Air Quality Standard	-
06-096 CMR 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, sub-§5	Mercury Emission Limit	Enforceable by State-only

(31) **Certification by a Responsible Official**

All reports, including quarterly reports, semiannual reports, and annual compliance certifications, required by this license to be submitted to the Department must be signed by a responsible official. [06-096 CMR 140]

(32) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning

Naval Computer and
Telecommunications Area Master
Station Atlantic Detachment Cutler
Washington County
Cutler, Maine
A-210-70-D-R

Departmental
Findings of Fact and Order
Air Emission License
Renewal

21

units in Subpart B. Examples of such units include refrigerators and any size air conditioners that contain CFCs. [40 CFR, Part 82, Subpart F]

(33) **Asbestos Abatement**

When undertaking Asbestos abatement activities, the licensee shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

(34) **Expiration of a Part 70 license**

A. NCTAMS LANT DET shall submit a complete Part 70 renewal application at least six months but no more than 18 months prior to the expiration of this air license.

B. Pursuant to Title 5 MRSA §10002, and 06-096 CMR 140, the Part 70 license shall not expire and all terms and conditions shall remain in effect until the Department takes final action on the renewal application of the Part 70 license. An existing source submitting a complete renewal application under Chapter 140 six (6) months prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license.

DONE AND DATED IN AUGUSTA, MAINE THIS 19th DAY OF June, 2012.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Melanie L. J. for
PATRICIA W. AHO, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application July 18, 2006

Date of application acceptance August 7, 2006

Date filed with Board of Environmental Protection _____

This Order prepared by Jonathan Voisine, Bureau of Air Quality



