

**Boralex Ashland LP
Aroostook County
Ashland, Maine
A-577-77-2-A**

**Departmental
Findings of Fact and Order
New Source Review 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, Section 590, Chapter 115 and the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Boralex Ashland LP (BALP)
Part 70 IDENTIFICATION NUMBER	A-577
LICENSE TYPE	Chapter 115 Minor Modification
NAIC CODES	4911 – Electrical Generation
NATURE OF BUSINESS	Electric Generating Station
FACILITY LOCATION	RR1, Box 125, American Realty Road, Ashland
DATE OF NSR MINOR MODIFICATION ISSUANCE	

B. Minor Modification

Boralex is seeking to certify BALP as a generator of renewable energy under the Connecticut Renewable Portfolio Standards (RPS) Program. This program requires a facility to complete a certification period during which it must be demonstrated the NO_x emission rate can be controlled to 0.075 lb/MMBtu on a quarterly average.

BALP has requested to be able to use the 4th quarter of 2007 as the certification period so as to take advantage of the relatively dry stockpiled biomass on site. An RPS certification demonstration during the 1st or 2nd quarter of 2008 would most likely incorporate biomass having a higher moisture content. This poorer quality fuel leads to a loss in plant efficiency (an increase in tons of fuel combusted per MW-hour output). The boiler is currently being operated at a reduced load (approximately 28 MW net) to meet the licensed CO emission limit. The decreased efficiency will require the load to be reduced below 28 MW to meet the licensed CO limit which will further decrease plant efficiency.

BALP has submitted an amendment for a Major Modification under 06-096 CMR 115 to allow for a long term CO emission increase. Given the timeframe to process a Major Modification, BALP has requested this Minor Modification under 06-096 CMR 115 so as to perform the RPS certification in the 4th quarter of 2007. The amendment is to modify the current average CO limit from 175.8 lb/hr to 263.7 lb/hr. Compliance with this lb/hr emission limit will be based on CO emissions not exceeding 0.45 lb/MMBtu (based on a 24-hour block average) and being demonstrated by means of a CO CEM. A stack test may also be requested by the Department to demonstrate compliance with the 267.3 lb/hr CO. This amendment is for a short term increase and will expire on December 31, 2007. The resulting estimated overall increase in CO emissions for calendar year 2007 will be 89.7 tons; less than the 100 tons per year significant emissions increase threshold for CO.

BALP commenced a fall maintenance outage on October 22, 2007. Improvements slated to be included during this outage are: installing a variable frequency drive on the process air fan for the ECOTUBE system, automating several over-fired air dampers and integrating the control of these dampers into the Distributed Control System. These adjustments will improve combustion control and overall efficiency, thus assist in both NO_x and CO control.

C. Application Classification

The application for BALP does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping.

Additionally, the modification of a major source is considered a major modification based on whether or not expected emissions increases exceed the "Significant Emission Increase Levels" as given in *Definitions Regulation*, 06-096 CMR 100 (last amended December 1, 2005). Given the CO emission increase as a result of this amendment will be 89.7 TPY, this application has been processed as a minor modification of a major source and has been processed through 06-096 CMR 115 of the Department's regulations.

E. Revised Facility Emissions

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

<u>Pollutant</u>	<u>Boiler (biomass)</u>	<u>Boiler (oil burner)</u>	<u>Boiler (spec. oil)</u>	<u>Generator</u>	<u>Fire Pump</u>	<u>Total TPY</u>
PM	51.32	1.40	0.04	0.11	0.11	53.0
PM ₁₀	51.32	1.40	0.04	0.11	0.11	53.0
SO ₂	59.54	35.50	0.39	0.05	0.02	95.5
NO _x	384.94	10.50	0.05	4.08	1.54	401.1
CO	863.3	2.50	0.01	0.88	0.33	867.02
VOC	41.06	0.10	0.01	0.32	0.12	41.6
NH ₃	51.7	--	--	--	--	51.7
Lead	0.27	--	--	--	--	0.27

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-577-77-2-A 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.

(1) Boiler #1

- A. CO emissions from Boiler #1 shall not exceed the following at all times during plant operation:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>	<u>Origin and Authority</u>
CO	0.45	263.7	06-096 CMR 115, BPT

- B. CO lb/MMBtu limits are based on a 24-hour average. A 24 hour block average is defined as midnight to midnight. [06-096 CMR 115, BPT]

- C. CO lb/hr limits are based on a 1-hour average and shall be demonstrated upon request by a stack test in accordance with this license. [06-096 CMR 115, BPT]
- D. BALP shall maintain the CO CEM in accordance with 06-096 CMR 117. The CEM shall meet the monitoring requirements of 40 CFR Part 60.13 as well as 40 CFR Part 60, Appendices B and F. [06-096 CMR 115, BPT]
- E. This condition shall expire on December 31, 2007. [06-096 CMR 115, BPT]

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

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 5, 2007
Date of application acceptance: October 10, 2007

Date filed with the Board of Environmental Protection: _____

This Order prepared by Mark Roberts, Bureau of Air Quality.