



JANET T. MILLS
GOVERNOR



MELANIE LOYZIM
COMMISSIONER

MEMORANDUM

TO: Mark C. Draper, Board Chair of the Board of Environmental Protection

FROM: Jeff Crawford, Director, Bureau of Air Quality
Pete Carleton, Enforcement Specialist, Bureau of Air Quality

SUBJECT: Administrative Consent Agreement, Global Companies LLC ("Global")

DATE: March 18, 2021

STATUTE AND RULE REFERENCES:

- 1: Air Emissions License (AEL) A-432-71-N-R, Specific Condition 16(A)(3) (Issued on January 23, 2013)
- 2: AEL A-432-71-N-R, Standard Condition 11(A and C) (Issued on January 23, 2013)

LOCATION:

1 Clark Road, South Portland, Maine 04106-2678

DESCRIPTION:

This enforcement action was initiated as the result of a compliance inspection finding that Global had purchased two separate deliveries of non-compliant (high sulfur content) fuel for use in their facility heating units. During a review of the records kept by Global, Bureau of Air Quality (BAQ) staff discovered that Global failed to timely submit a compliance stack test result report within the required 30-day time period.

Violation #1 (Paragraph 7):

On April 3, 2019, the Department performed a routine compliance inspection at Global. A review of facility records revealed that on December 10, 2018 and February 9, 2019 Global received deliveries of #6 fuel oil to their common "Day Tank" that contained 1.66% and 1.60% sulfur content in violation of the 0.5% sulfur content limit on #6 fuel oil. Global used the non-compliant fuel between January 3, 2019 and March 22, 2019, at which time the facility discontinued the use of #6 fuel oil in favor natural gas.



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Violation #2 {Paragraph 10):

Standard condition 11(C) of AEL A-432-71-N-R requires a written report with the results of compliance stack testing to be submitted to the Bureau of Air Quality within thirty (30) days of the compliance stack test completion. Global did not report the results of a June 5, 2019 compliance stack test until July 12, 2019, 37 days after the test's completion.

Environmental Issues:

The fuel sulfur content violation addressed in this Administrative Consent Agreement would have resulted in an increase of S02 emissions from the facility's Boilers #1 and #2 during periods of time that the high sulfur #6 fuel oil was being combusted. However, there is no evidence of what the S02 emissions were during those periods and no evidence that Global exceeded the S02 emissions standard during those periods.

Staff Recommendation:

The Department recommends acceptance of this Administrative Consent Agreement as proposed, stipulating a civil monetary penalty of twenty thousand dollars (\$20,000.00).

Is the agreement subject to 30-day public comment pursuant to 38 M.R.S. § 347-A(6)?

Yes No

POSTED FOR 30-DAY PUBLIC COMMENT :

Enforcement Coordinator: _____ Posting Date: _____ Expires: _____