



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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**Maine Army National Guard
Camp Keyes
Kennebec County
Augusta, Maine
A-802-71-F-N/A (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Renewal/Amendment
After-The-Fact**

FINDINGS OF FACT

After review of the air emissions license renewal/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., §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

1. Maine Army National Guard (Camp Keyes), of Augusta, Maine has applied to renew their Air Emission License permitting the operation of emission sources associated with their military facility.
2. Camp Keyes has also undertaken upgrades to the existing heating systems which includes the replacement of antiquated boiler units with new units.
3. Camp Keyes is also requesting the addition of a new back-up diesel generator.
4. The equipment addressed in this license is located at 195 Winthrop Street, Augusta, Maine at the Maine Army National Guard Camp Keyes facility.

B. Emission Equipment

Camp Keyes is applying to include the operation of the following equipment to its air emissions license:

Diesel Generator

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Power Output (HP)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Date of Manufacture</u>
DG #1	5.25	750	31.5	Diesel Fuel Oil, 15 ppm	2007
DG #2	1.5	215	10.7	Diesel Fuel Oil, 15 ppm	2008
*DG #3	2.8	400	20	Diesel Fuel Oil, 15 ppm	2009

* Denotes a new unit not listed in the facility's previous Air Emission License (A-802-71-C-R).

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312 CANCO ROAD
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PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
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Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type</u>	<u>Manufacture Date</u>	<u>Stack #</u>
PH #1	7.0	52 scfm	Propane	1992	37B
*Boiler #1	2.8	19.8 gal/hr	#2 Fuel Oil	2006	7A
**Boiler #2A	2.2	16.0 gal/hr	#2 Fuel Oil	2010	14/35A
**Boiler #2B	2.2	16.0 gal/hr	#2 Fuel Oil	2010	14/35A
**Boiler #3A	1.6	11.6 gal/hr	#2 Fuel Oil	2010	37A
**Boiler #3B	1.6	11.6 gal/hr	#2 Fuel Oil	2010	37A
*Boiler #4A	1.2	8.8 gal/hr	#2 Fuel Oil	2009	39A
*Boiler #4B	1.2	8.8 gal/hr	#2 Fuel Oil	2009	39A

* Denotes units with capacities updated from previous Air Emission License (A-802-71-C-R).

** Denotes units that replaced units that were listed in previous Air Emission License (A-802-71-C-R).

C. Insignificant Activities

Camp Keyes makes use of several small boilers and propane heaters to satisfy heating and hot water needs for the facility's buildings. These units are under 1.0 MMBtu/hr heat input capacity and are therefore considered by the Department to be insignificant activities and are mentioned only for inventory purposes and will not be included in short term emission rate calculations. These units are not listed in the license but are included in the fuel capacity limits for the total facility's annual emissions calculations.

D. Application Classification

Camp Keyes has applied for an Air Emission License renewal and the application includes modifications (new equipment added and some old equipment removed) to the facility's emissions equipment inventory. The modification of a minor source is considered a major modification based on whether or not expected emission increases exceed the "Significant Emission Levels" as given in Maine's Air Regulations. The expected emissions increases from the boiler change outs and the addition of the new back-up generator do not exceed the "Significant Emission Levels", therefore, this modification associated with this Air Emission License renewal is determined to be a minor modification. With fuel limits on the boiler units and restrictions on operating hours for the diesel generators, the facility is licensed below the Major Source thresholds and is considered a Synthetic Minor.

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 *Definitions Regulation*, 06-096 CMR 100 (last amended December 1, 2005). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

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. #2 Fuel Oil Fired Boilers

1. Boiler Units

Camp Keyes' current Air Emission License (A-802-71-C-R) allows for the operation of 5 small #2 fuel oil fired boilers for facility heat and hot water, designated Boilers #1, #2, #3, #4A and #4B. The Maine Army National Guard has applied to update the heat input capacities for Boilers #1, #4A and #4B. Previously, A-802-71-C-R had listed Boiler #1 as having a heat input capacity of 1.45 MMBtu/hr (firing #2 fuel oil at a rate of 10.5 gal/hr) and Boilers #4A and #4B each as having heat input capacities of 1.4 MMBtu/hr (firing #2 fuel oil at a rate of 10 gal/hr).

Upon a more recent review by the Maine Army National Guard, it was found that the actual heat input capacity of Boiler #1 is 2.8 MMBtu/hr (firing #2 fuel oil at a rate of 19.8 gal/hr) and Boilers #4A and #4B each is 1.23 MMBtu/hr (each firing #2 fuel oil at a rate of 8.8 gal/hr).

To improve heating efficiencies at the facility, Maine Army National Guard has also replaced Boilers #2 and #3 with smaller units. Boiler #2 (a 4.4 MMBtu/hr unit) has been replaced with two smaller boilers, designated Boilers #2A and #2B, each with a heat input capacity of 2.2 MMBtu/hr (each firing #2 fuel oil at a rate of 16.0 gal/hr).

Similarly, Boiler #3 (a 4.4 MMBtu/hr unit) has been replaced with two smaller boilers, designated Boilers #3A and #3B, each with a heat input capacity of 1.6 MMBtu/hr (each firing #2 fuel oil at a rate of 11.6 gal/hr). The boiler replacements took place in 2010.

All of the #2 fuel oil fired boilers are below the applicability threshold and are therefore not subject to EPA New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units*, for boilers with a heat input of 10 MMBtu/hr or greater and manufactured after June 9, 1989.

Camp Keyes was previously licensed to fire no greater than 200,000 gallons per year (gal/yr) of #2 fuel oil based on a twelve-month rolling total. The Maine Army National Guard has not requested a change in the currently established fuel limit for Camp Keyes, therefore no change in fuel limit will take place as a result of this Renewal/Amendment. However, the Department has reevaluated the BPT/BACT determinations for sulfur content of #2 fuel oil fired in licensed boilers.

Prior to January 1, 2016 or the date specified in 38 MRSA §603-A(2)(A)(3), the #2 fuel oil fired in the boiler shall be ASTM D396 compliant (max. sulfur content of 0.5% by weight). Beginning January 1, 2016 or on the date specified in 38 MRSA §603-A(2)(A)(3), the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm). Beginning January 1, 2018 or on the date specified in 38 MRSA §603-A(2)(A)(3), the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm).

A summary of the BPT/BACT analysis for Boilers #1 (2.8 MMBtu/hr), #2A (2.2 MMBtu/hr), #2B (2.2 MMBtu/hr), #3A (1.6 MMBtu/hr), #3B (1.6 MMBtu/hr), #4A (1.2 MMBtu/hr) and #4B (1.2 MMBtu/hr) is as follows:

- a. PM emission limit of 0.08 lb/MMBtu when firing #2 fuel oil and shall be considered BACT. PM₁₀ emission limits are derived from PM limits.
- b. SO₂ emissions limits are based on the firing of #2 fuel oil which meets the criteria in ASTM D396 for #2 fuel oil.
- c. NO_x, CO and VOC emission limits calculations are based upon factors used in the facility's previous air emission license as the new units are of a similar size to the previously licensed units and will be operated in a similar manner.
- d. Visible emissions from each stack are subject to *Visible Emissions Regulation*, 06-096 CMR 101 (as amended). Visible emissions from each stack shall not exceed 20% opacity on a six-minute block average except, for no more than 2 six-minute block averages in a 3-hour period.

2. 40 CFR Part 63 Subpart JJJJJ

The boiler units at the Camp Keyes facility may be subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ). Subpart JJJJJ applies to existing units of any size or new units under 10 MMBtu/hr. For informational purposes, a summary of the currently applicable federal 40 CFR Part 63 Subpart JJJJJ requirements is listed below. At this time, the Maine Department of Environmental Protection has not taken delegation of this area source MACT (Maximum Achievable Control Technology) rule promulgated by EPA, however the Camp Keyes facility is still subject to the requirements of this rule.

a. Compliance Dates, Notifications, and Work Practice Requirements

i. Initial Notification of Compliance

An Initial Notification submittal to EPA is due no later than January 20, 2014.
[40 CFR Part 63.11225(a)(2)]

ii. Boiler Tune-Up Program

(a) A boiler tune-up program shall be implemented to include the initial tune-up of applicable boilers no later than March 21, 2014.
[40 CFR Part 63.11196(a)(1)]

(b) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(1)]

2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]

3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than 5 MMBtu/hr, boilers with oxygen trim system, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]
 4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
 5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]
 6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up.
[40 CFR Part 63.11223(b)(7)]
- (c) After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]
- (d) The facility shall implement a boiler tune-up program after the initial tune-up and initial compliance report (called a Notification of Compliance Status) has been submitted.
1. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

Boiler Category	Tune-up Frequency
New and Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with less tune requirements" listed below.	Every 2 years

Tune-up Schedule Table continued

<i>New and Existing Oil, Biomass, and Coal fired Boilers with less frequent tune up requirements</i>	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
With a heat input capacity of <5MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up.	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

2. The tune-up compliance report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the concentration of CO in the effluent stream (ppmv) and oxygen in volume percent, measured at high fire or typical operating load, before and after the boiler tune-up, a description of any corrective actions taken as part of the tune-up of the boiler, and the types and amounts of fuels used over the 12 months prior to the tune-up of the boiler.

[40 CFR Part 63.11223(b)(6)]

3. The compliance report shall also include the company name and address; a compliance statement signed by a responsible official certifying truth, accuracy, and completeness; and a description of any deviations and corrective actions. [40 CFR Part 63.11225(b)]

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 CFR Part 63 Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]: copies of notifications and reports with supporting compliance documentation; identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation. Records shall be in a form suitable and readily available for expeditious review.

Note: EPA will require submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. However, the system will not be in place until October 2013, so sources may submit the written NOCS to the EPA Administrator. [63.1125(a)(4)(vi)]

Notification forms and additional rule information can be found on the following EPA website: <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

C. Propane Heater (PH #1)

Camp Keyes makes use of a propane heater, designated PH #1, to provide heat to the facility's paint booth during painting operations. PH#1 has a maximum heat input capacity of 7.0 MMBtu/hr firing propane. The unit was constructed and installed in 1992. PH#1 is below the applicability threshold and is therefore not subject to EPA New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, for boilers with a heat input of 10 MMBtu/hr greater and manufactured after June 9, 1989.

Gas-fired boilers are exempt from 40 CFR Part 63, Subpart JJJJJJ. A "gas-fired boiler" is defined as any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.[40 CFR Part 63.11237]

A summary of the BPT analysis for PH#1 is as follows:

1. 06-096 CMR 103 regulates PM emission limits. However, the PM emission limit of 0.05 lb/MMBtu when firing propane is more stringent and shall be considered BACT. PM₁₀ emission limits are derived from PM limits.
2. SO_x, NO_x, CO and VOC emission limits are based upon AP-42 data dated 10/96.
3. Visible emissions from the PH#1 stack shall not exceed 10% opacity based on a six-minute block average.

D. Diesel Generators

1. Diesel Generators

Camp Keyes' current Air Emission License (A-802-71-C-R) includes the operation of diesel generator DG #1 rated at 5.25 MMBtu/hr heat input (approximately 750 HP power output) firing diesel fuel at a rate of 31.5 gallons per hour (gal/hr). DG #1 was manufactured and installed in 2007. Air Emission License amendment A-802-71-D-A includes the addition of diesel generator DG #2 with a heat input rating of 1.5 MMBtu/hr (approximately 215 HP power output) firing diesel fuel at a rate of 10.7 gal/hr. DG #2 was manufactured and installed in 2008. Camp Keyes has applied to add a new diesel generator to the facility's licensed equipment inventory list. The new diesel generator, designated DG #3, has a heat input capacity of 2.8 MMBtu/hr (approximately 400 HP power output) firing diesel fuel at a rate of 20.0 gallons per hour (gal/hr). DG #3 was manufactured and installed in 2009 and 2010 respectively.

The following is a summary of the BPT/BACT analysis for DG #1 (750HP), DG #2 (215HP) and DG #3 (400HP):

- a. Camp Keyes shall only be permitted to operate DG #3 in response to an OP-4 emergency for a total of no more than 50 hours each calendar year. Camp Keyes shall maintain a written log of all diesel generator operating hours. The log shall include the date, duration of operation, reason for operation and if operation is in response to an OP-4 emergency, Camp Keyes shall include the documentation of the request from ISO New England.
 - b. 06-096 CMR 103 regulates PM emission limits and are the basis for the hourly and annual emission restrictions established in this AEL. The PM₁₀ limits are derived from the PM limits.
 - c. NO_x, CO, and VOC emission restrictions established in this license are based upon AP-42 data dated 10/96.
 - d. Visible emissions from each diesel stack are subject to 06-096 CMR 101. Visible emissions from each diesel generator shall not exceed 20% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a continuous 3-hour period.
2. 40 CFR Part 60, Subpart IIII

DG #1, DG #2 and DG #3 were all manufactured after July 11, 2005, therefore, all are subject to New Source Performance Standards 40 CFR Part 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*. By meeting the requirements of Subpart IIII, the units also meet the requirements found in the *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 CFR Part 63, Subpart ZZZZ.

- a. Emergency Definition:

Emergency stationary ICE means any stationary reciprocating internal combustion engine that meets all of the following criteria:

- (1) The stationary ICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary ICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary ICE used to pump water in the case of fire or flood, etc.

- (2) Paragraph (1) above notwithstanding, the emergency stationary ICE may be operated for any combination of the purposes specified below for a maximum of 100 hours per calendar year:
- (i) Maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
 - (ii) Emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
 - (iii) Periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
- (3) Paragraphs (1) and (2) above notwithstanding, emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. These 50 hours are counted as part of the 100 hours per calendar year for maintenance checks and readiness testing, emergency demand response, and periods of voltage deviation or low frequency, as provided in paragraph (2) above. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity, except if the following conditions are met:
- (i) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
 - (ii) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

- (iii) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
- (iv) The power is provided only to the facility itself or to support the local transmission and distribution system.
- (v) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
[40 CFR §60.4211(f) and §60.4219]

b. 40 CFR Part 60, Subpart IIII Requirements:

The generators shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in 40 CFR §60.4202. [40 CFR §60.4205(b)]

The diesel fuel fired in the generators shall not exceed 15 ppm sulfur (0.0015% sulfur), except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. [40 CFR §60.4207(b)]

A non-resettable hour meter shall be installed and operated on each generator. [40 CFR §60.4209(a)]

The generators shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by Camp Keyes that are approved by the engine manufacturer. Camp Keyes may only change those emission-related settings that are permitted by the manufacturer. [40 CFR §60.4211(a)]

The generators shall each be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity unless the conditions in §60.4211(f)(3)(i) are met). [40 CFR §60.4211(f)]

No initial notification is required for emergency engines. [40 CFR §60.4214(b)]

If Camp Keyes operates or is contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in §60.4211(f)(3)(i), the facility shall submit an annual report containing the information in §60.4214(d)(1)(i) through (vii). The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. The annual report must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form is not available in CEDRI at the time that the report is due, the written report must be submitted to the following address:

Director, Office of Ecosystem Protection
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, MA 02109-3912

E. Liquid Storage Tanks

The Maine Army National Guard has included several above ground liquid storage tanks in the Camp Keyes Air Emission License application. These tanks act as fuel storage for the facility boiler and diesel generator units. There are no tanks at the Camp Keyes facility large enough to be subject to EPA NSPS 40 CFR Part 60, Subpart Kb, therefore, the tanks are mentioned in this "Finding of Fact" for inventory purposes only. A complete list of the tanks can be found in the Camp Keyes Air Emission License renewal application submitted to the Department by the Maine Army National Guard.

F. Existing Process Equipment

Camp Keyes makes use of a spray paint booth for painting of various military vehicles. The paint booth has been designed and constructed to minimize employee exposure to solvents and to minimize volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions to the outside air. The booth is equipped with an updraft air circulation system. When in use, air flows into the spray booth via ductwork, then the air is exhausted through particulate filters located in the booth's ceiling. The propane-fired heating unit (as discussed in Section (II)(C) of this AEL) is fired whenever spray painting operations are undertaken in the booth. It is used to heat the booth to a sufficient temperature for painting.

Camp Keyes makes use of various types of coatings, including non-VOC coatings. Historically, VOC emissions from the spray booth operation have amounted to approximately 2,000 pounds (1 ton) per year of VOC from the operation of the paint booth, without consideration of any control technologies. Camp Keyes expects to have greater through-put for the spray booth in the future and anticipates VOC emissions from this operation to increase to approximately 3,000 pounds (1.5 tons) per year as well as approximately 300 pounds per year of HAPs. Camp Keyes has accepted a VOC emissions restriction of no greater than 2.5 tons per year of VOC emissions from the spray booth operation. Camp Keyes has also accepted a HAP emission restriction of no greater than 1.0 ton/yr of any individual HAP and no greater than 2.0 ton/yr of total HAP emissions from the spray booth operations.

Maine's rule *Surface Coating Facilities* 06-096 CMR 129 (as amended) specifically exempts the refinishing of automobile, light duty truck and heavy duty truck refinishing. Therefore, the Department has determined that the spray booth operation at Camp Keyes is not subject to 06-096 CMR 129.

The refinishing (coating) of mobile equipment for the Maine Army National Guard, undertaken at the Camp Keyes facility, is subject to the requirements established in *MOBILE EQUIPMENT REPAIR AND REFINISHING*, 06-096 CMR 153.

Camp Keyes has an effective record keeping program for the monitoring of coating use and VOC and HAP emissions from the spray booth operation. This record keeping program complies with the requirements of 06-096 CMR 129, Subsection 7(B). BPT for the spray booth operation shall be continued record keeping in accordance with the facility's current record keeping program.

Camp Keyes also has an effective control device maintenance, inspection and filter replacement program for the fabric filter particulate control system. BPT for the spray booth operation shall be the continued performance of the maintenance, inspection and filter replacement in accordance with the facility's current program.

Visible emissions from the spray booth particulate filter exhaust shall not exceed 5% opacity on a 6-minute block average.

G. Parts Washers

Camp Keyes makes use of three 30-gallon parts washers. The parts washers currently utilize mineral spirits as a cleaning medium. Camp Keyes shall maintain a record of solvent use that shall include the amount of solvent added to the parts washers and the dates that the solvent was added. The record shall be maintained on a monthly and a calendar year basis.

For purposes of record keeping, the amount of solvent used shall be considered as the difference between the amount of solvent added and the amount of solvent removed. If, in the future, Camp Keyes switches to a solvent that contains 5% VOC or less for use in the parts washers, to satisfy record keeping requirements Camp Keyes need only keep a copy of the material data safety sheets (MSDS) sheet that demonstrates the VOC content of the solvent on file at the Camp Keyes facility. The parts washers are subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended) and records shall be kept documenting compliance.

H. Wood Shop Cyclone

Camp Keyes makes use of a wood shop for construction of small office furniture. Wood dust from the wood shop equipment is captured via a dust collection system and is vented to the outside via a dust cyclone. Dust captured by the cyclone drops down into a barrel located beneath the cyclone.

This cyclone was not previously included in the facility's air emission license, therefore it is required that emissions are receiving BACT. As a requirement of BACT, Camp Keyes shall establish a program of cyclone inspection and maintenance. The program shall include periodic inspection of the cyclone to determine proper operation and periodic removal of the collected dust for the wood shop cyclone so that the dust level does not accumulate to a level that the cyclone is no longer effective.

Visible emissions from wood shop cyclone shall not exceed an opacity of 20% at the settling chamber exhaust on a 6-minute block average basis, except for no more than 1 six-minute block average in a 1-hour period.

I. Annual Emissions

1. Total Annual Emissions

- Annual facility emissions for the fuel burning equipment was calculated based on an annual fuel use restriction of 200,000 gal/yr #2 oil, 8,760 hr/yr operation of PH#1, and 500 hr/yr operation of each diesel generator (DG #1, #2, and #3).
- Annual facility emissions totals also include VOC and HAP emissions from the spray booth operation.

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

Equipment	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	Individual HAPs	Total HAPs
Oil Fired Boilers	1.7	1.7	7.1	4.2	0.5	0.03	-	-
PH#1	1.5	1.5	0.003	0.3	0.6	0.1	-	-
DG#1	0.2	0.2	0.07	4.2	1.1	0.1	-	-
DG#2	0.05	0.05	0.02	1.2	0.3	0.03	-	-
DG#3	0.08	0.08	0.04	3.1	0.7	0.06	-	-
Spray Booth	-	-	-	-	-	2.5	1.0	2.0
Total TPY	3.5	3.5	7.2	13.0	3.2	2.8	1.0	2.0

2. 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 limit(s), 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, Camp Keyes 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 at this time.

III. AMBIENT AIR QUALITY ANALYSIS

According to 06-096 CMR 115, the level of air quality analyses required for a minor source shall be determined on a case-by case basis. Based on the information available in the file, and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source. Based on the total facility emissions, Camp Keyes is below the emissions level required for modeling and monitoring.

Maine Army National Guard
Camp Keyes
Kennebec County
Augusta, Maine
A-802-71-F-N/A (SM)

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Departmental
Findings of Fact and Order
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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-802-71-F-R/A (SM) subject to 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.

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 (38 M.R.S.A. §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 06-096 CMR 115. [06-096 CMR 115]
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) 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 115]
- (4) 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 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353. [06-096 CMR 115]

- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. 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 a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]
- (10) 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 115]
- (11) 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 to demonstrate compliance with the applicable emission standards 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; or
 2. 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 115]

- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate 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 115]
- (13) Notwithstanding any other provisions 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 115]
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]
- (15) Upon written request from 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 a 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 115]

SPECIFIC CONDITIONS

(16) Oil Fired Boilers (Boilers #1, #2A, #2B, #3A, #3B, #4A and #4B)

A. Fuel Use Restrictions

1. Camp Keyes shall not exceed a total annual facility fuel cap of 200,000 gal/yr of #2 fuel oil based on a calendar year basis.
2. Prior to January 1, 2016 or the date specified in 38 MRSA §603-A(2)(A)(3), the #2 fuel oil fired in the boiler shall be ASTM D396 compliant (max. sulfur content of 0.5% by weight). Beginning January 1, 2016 or on the date specified in 38 MRSA §603-A(2)(A)(3), the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm). Beginning January 1, 2018 or on the date specified in 38 MRSA §603-A(2)(A)(3), the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm). [38 MRSA §603-A(2)(A)(3), 06-096 CMR 115, BPT]
5. Compliance shall be demonstrated by fuel records from the supplier showing the quantity, type, and the percent sulfur of the fuel delivered (if applicable). Records of annual fuel use shall be kept on a monthly and calendar year basis. [06-096 CMR 115, BPT]

B. Boiler emissions shall not exceed the following:

Equipment	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.2	0.2	1.4	0.8	0.1	0.01
Boiler #2A	0.2	0.2	1.1	0.7	0.1	0.01
Boiler #2B	0.2	0.2	1.1	0.7	0.1	0.01
Boiler #3A	0.1	0.1	1.0	0.5	0.1	0.01
Boiler #3B	0.1	0.1	1.0	0.5	0.1	0.01
Boiler #4A	0.1	0.1	0.6	0.4	0.1	0.01
Boiler #4B	0.1	0.1	0.6	0.4	0.1	0.01

[06-096 CMR 115, BPT]

- C. Visible emissions from each boiler stack shall not exceed 20% opacity on a six-minute block average, except for no more than 2 six-minute block averages in a 3-hour period. [06-096 CMR 101]

(17) Propane Heater (PH#1)

A. Emissions from PH#1 shall not exceed the following;

Equipment	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
PH #1	0.3	0.3	0.001	0.07	0.1	0.02

[06-096 CMR 115, BPT]

B. Visible emissions from the PH#1 stack shall not exceed 10% opacity based on a six-minute block average. [06-096 CMR 101]

(18) Diesel Generators (DG#1, DG #2 and DG #3)

A. The generators are each limited to 500 hours per year total operation, based on a calendar year. Compliance shall be demonstrated by a written log of all generator operating hours. [06-096 CMR 115]

B. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
DG #1	PM	0.12	06-096 CMR 103(2)(B)(1)(a)

C. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
DG #1	0.6	0.6	0.002	16.8	4.5	0.5
DG #2	0.2	0.2	0.001	6.6	1.4	0.1
DG #3	0.3	0.3	0.001	12.3	2.7	0.3

D. Visible Emissions

Visible emissions from each of the diesel generators 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. [06-096 CMR 101]

E. The three diesel generators shall meet the applicable requirements of 40 CFR Part 60, Subpart III, including the following:

1. The diesel generators shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in §60.4202. [40 CFR §60.4205(b)]
2. The diesel fuel fired in the generators shall not exceed 15 ppm sulfur (0.0015% sulfur), except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. Compliance with the fuel sulfur content limit shall be based on fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [40 CFR §60.4207(b) and 06-096 CMR 115]
3. A non-resettable hour meter shall be installed and operated on each generator. [40 CFR §60.4209(a)]
4. The generators shall each be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity unless the conditions in §60.4211(f)(3)(i) are met). These limits are based on a calendar year. Compliance shall be demonstrated by a written log of all generator operating hours. [40 CFR §60.4211(f) and 06-096 CMR 115]
5. The generators shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by Camp Keyes that are approved by the engine manufacturer. Camp Keyes may only change those emission-related settings that are permitted by the manufacturer. [40 CFR §60.4211(a)]
6. If Camp Keyes operates or is contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in §60.4211(f)(3)(i), the facility shall submit an annual report containing the information in §60.4214(d)(1)(i) through (vii). The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

The annual report must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form is not available in CEDRI at the time that the report is due, the written report must be submitted to the following address:

Director, Office of Ecosystem Protection
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, MA 02109-3912

(19) Paint Spray Booth

- A. Camp Keyes shall be restricted to no greater than 2.5 tons per year of VOC emissions from the spray booth operation. Camp Keyes shall also be restricted to emissions of no greater than 1.0 ton/yr of any individual HAP and no greater than 2.0 ton/yr of total HAP emissions from the spray booth operations. [06-096 CMR 115, BPT]
- B. Compliance with VOC and HAP emission limits shall be demonstrated via the facility's record keeping program for the monitoring of coating use and VOC and HAP from the spray booth operation. [06-096 CMR 115, BPT]
- C. Camp Keyes shall continue to maintain record keeping in accordance with the facility's current record keeping program which includes recording the amount of paint used and the VOC and HAP content of the paint as well as recording the amount of use of solvents associated with the spray booth operations and the VOC and HAP content of those solvents. [06-096 CMR 115, BPT]
- D. Visible emissions from the spray booth particulate filter exhaust shall not exceed 5% opacity on a 6-minute block average. [06-096 CMR 101]
- E. Camp Keyes shall continue the performance of the facility's current maintenance, inspection and filter replacement program. [06-096 CMR 115, BPT]
- F. When undertaking coating operations for mobile sources other than the fleet operated by the Maine Army National Guard, Camp Keyes shall comply with the requirements established in 06-096 CMR 153.

(20) Parts Washers

The Parts washers at Camp Keyes are subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended).

- A. Camp Keyes shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]
- B. As per 06-096 CMR 130, Section (1)(B), the following are exempt from the requirements of 06-096 CMR 130:
 1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
 2. Wipe cleaning; and,
 3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
- C. The following standards apply to cold cleaning machines that are applicable sources under Chapter 130.
 1. Camp Keyes shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
 - (i) Waste solvent shall be collected and stored in closed containers.
 - (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
 - (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
 - (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
 - (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.
 - (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
 - (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
 - (viii) Work area fans shall not blow across the opening of the degreaser unit.
 - (ix) The solvent level shall not exceed the fill line.
 2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

D. Camp Keyes shall maintain a record of solvent use for the parts washers. The record shall include solvent added and removed, the dates when solvent is added and the volume of solvent added and removed and the VOC content of the solvent. If, in the future, Camp Keyes switches to a solvent that contains 5% VOC or less for use in the parts degreaser, to satisfy record keeping requirements Camp Keyes need only keep a copy of the MSDS sheet that demonstrates the VOC content of the solvent on file at the Camp Keyes facility. [06-096 CMR 115, BPT]

(21) Wood Shop Cyclone

A. Camp Keyes shall establish a program of cyclone inspection and maintenance, which shall include periodic inspection of the cyclone to determine proper operation and periodic removal of the collected dust for the wood shop cyclone.
[06-096 CMR 115, BPT]

B. Visible emissions from wood shop cyclone shall not exceed an opacity of 20% at the settling chamber exhaust on a 6-minute block average basis, except for no more than 1 six-minute block average in a 1-hour period. [06-096 CMR 101]

(22) Fugitive Emissions

Visible emissions from a fugitive emission source (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 101]

(23) General Process Sources

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

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- (24) Camp Keyes 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 (Title 38 MRSA §605-C).

DONE AND DATED IN AUGUSTA, MAINE THIS 28 DAY OF June 2013.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Corne for
PATRICIA W. AHO, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

The term of this license shall be ten (10) years from the signature date above.

[Note: If a complete renewal application, as determined by the Department, is submitted prior to expiration, then pursuant to Title 5 MRSA §10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the renewal of the license.]

Date of initial receipt of application: **January 25, 2012**

Date of application acceptance: **February 23, 2012**

Date filed with the Board of Environmental Protection: _____

This Order prepared by Peter G. Carleton, Bureau of Air Quality

