



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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**Penobscot McCrum, LLC
Waldo County
Belfast, Maine
A-830-71-D-R/M**

**Departmental
Findings of Fact and Order
Air Emission License
After-the-Fact Renewal/
Minor Revision**

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

I. REGISTRATION

A. Introduction

The Air Emission License for Penobscot McCrum, LLC (McCrum) expired on March 22, 2012. McCrum has applied to renew their expired license permitting the operation of emission sources associated with their potato processing plant.

McCrum has also requested a minor revision to their license in order to reflect the replacement of Boiler #1 with a new firetube Cleaver Brooks Boiler and the removal of Boiler #2. Boiler #2 has been disconnected from all fuel lines and all electrical conduit has been cut. In addition, McCrum has requested that the license reflect Boiler #1 and the oven as a dual fuel fired units, capable of firing #2 fuel oil and natural gas in the boiler, and propane and natural gas in the oven. Currently the facility only fires #2 fuel oil in Boiler #1 and propane in the oven, but there have been discussions to fire natural gas once it becomes a viable option.

The equipment addressed in this license is located at 28 Pierce Street, Belfast, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type, % sulfur</u>	<u>Install. Date</u>	<u>Stack #</u>
Boiler #1	4.2	30 gal/hr	#2 Fuel oil, 0.5%	2012	1
		4,064 scf/hr	Natural gas	2013	
Oven	6.5	72 gal/hr	Propane	2002	3
		6,311 scf/hr	Natural gas	2013	

McCrum has two additional electric fired ovens. These ovens are considered insignificant activities and are mentioned for inventory purposes only.

Solvent Degreaser

McCrum operates a Safety Kleen degreaser with a 12 gallon capacity.

C. Application Classification

The previous air emission license for McCrum expired on March 22, 2012. A complete application was not submitted prior to the expiration date, therefore McCrum is considered to be an existing source applying for an after-the-fact renewal. The facility has also applied for an amendment which will increase emissions by less than 4 ton/year for each single pollutant and less than 8 ton/year for all pollutants combined. Therefore, this modification is determined to be a minor revision and an after-the-fact renewal and has been processed as such. The Department has determined the facility is a minor source and the application has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended).

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 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for an after-the-fact renewal requires an analysis similar to a Best Available Control Technology analysis per 06-096 CMR 115 (as amended).

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Boiler #1

McCrum has replaced the existing old Fulton Watertube boiler with a new Cleaver Brooks boiler, designated Boiler #1. The boiler is rated at 4.2 MMBtu/hr and is capable of firing #2 fuel oil and natural gas. The boiler was manufactured and installed in 2012 and exhausts through Stack #1.

Due to its size, Boiler #1 is not subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989.

1. BACT Findings

The BACT emission limits for the boiler were based on the following:

#2 Fuel Oil

- PM/PM₁₀ – Emissions are regulated by 06-096 CMR 103, *Fuel Burning Equipment Particulate Emission Standard*, however, the BACT determined PM emission limit of 0.08 lb/MMBtu when firing #2 fuel oil is more stringent [06-096 CMR 115, BACT]
- SO₂ – Based on firing ASTM D396 #2 fuel oil (0.5% sulfur); 0.5 lb/MMBtu
- NO_x – 20 lb/1000 gal, AP-42, Table 1.3-1, dated 5/10
- CO – 5 lb/1000 gal, AP-42, Table 1.3-1, dated 5/10
- VOC – 0.34 lb/1000 gal, AP-42, Table 1.3-3, dated 5/10
- Opacity – Visible emissions from the boiler shall not exceed 20% opacity on a 6-minute block average, except for no more than one (1) six (6) minute block average in a 3-hour period.

Natural Gas

- PM/PM₁₀ – Emissions are regulated by 06-096 CMR 103, *Fuel Burning Equipment Particulate Emission Standard*, however, the BACT determined PM emission limit of 0.05 lb/MMBtu when firing natural gas is more stringent [06-096 CMR 115, BACT]

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SO₂ – 0.6 lb/MMscf, AP-42, Table 1.4-2, dated 7/98
NO_x – 100 lb/MMscf, AP-42, Table 1.4-1, dated 7/98
CO – 84 lb/MMscf, AP-42, Table 1.4-1, dated 7/98
VOC – 5.5 lb/MMscf, AP-42, Table 1.4-2, dated 7/98
Opacity – Visible emissions from the boiler shall not exceed 10% opacity on a 6-minute block average, except for no more than one (1) six (6) minute block average in a 3-hour period.

The BACT emission limits for the boiler are the following:

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM₁₀ (lb/hr)</u>	<u>SO₂ (lb/hr)</u>	<u>NO_x (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
Boiler #1 - #2 fuel oil	0.33	0.33	2.09	0.60	0.15	0.01
Boiler #1 - natural gas	0.21	0.21	0.01	0.41	0.34	0.02

McCrum had previously been limited to 300,000 gallons/yr of #2 fuel oil when two boilers were in operation. Due to the removal of one of these boilers and the replacement of the other with a smaller unit, the fuel cap limit has been removed.

Prior to January 1, 2016, any #2 fuel oil fired in Boiler #1 shall be ASTM D396 compliant #2 fuel oil (maximum sulfur content of 0.5% by weight). Per 38 MRSA §603-A(2)(A)(3), beginning January 1, 2016, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm), and beginning January 1, 2018, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm).

2. Periodic Monitoring

Periodic monitoring for the boiler shall include recordkeeping to document fuel use both on a monthly and calendar year basis. Documentation shall include the quantity and type of fuel used and sulfur content of the fuel, if applicable.

3. 40 CFR Part 63 Subpart JJJJJ

Boiler #1 currently fires only #2 fuel oil and is considered a new boiler rated less than 10 MMBtu/hr. Therefore, the boiler 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).

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If McCrum switches to natural gas as the primary fuel source when the option is available, the boiler will be classified as a gas-fired boiler and will therefore be exempt from 40 CFR Part 63, Subpart JJJJJJ. A gas-fired boiler is defined by this Subpart as follows:

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 firing liquid fuel shall not exceed a combined total of 48 hours during any calendar year. [40 CFR § 63.11237]

When natural gas is the primary fuel source, operation of Boiler #1 outside of these parameters may trigger applicability of 40 CFR Part 63 Subpart JJJJJJ for the boiler. When applicable, records shall be maintained to document operation of Boiler #1 as a gas-fired boiler, as defined.

Operation of Boiler #1 such that it does not fit the definition of "gas-fired boiler" given above would cause the boiler to be considered a new commercial boiler as defined in 40 CFR §63.11237 that is located at or is part of an area source of hazardous air pollutants (HAP), as defined in §63.2. As such, the boiler may be subject to 40 CFR Part 63, Subpart JJJJJJ.

For informational purposes, a summary of the currently applicable federal 40 CFR Part 63, Subpart JJJJJJ requirements is provided 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, McCrum is still subject to the requirements if Boiler #1 is not operated as a gas-fired boiler. Notification forms and additional rule information can be found on the following website: <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

a. Compliance Dates, Notifications, and Work Practice Requirements

i. Initial Notification of Compliance

An Initial Notification submittal to EPA was due within 120 days after the source became subject to the standard. [40 CFR Part 63.11225(a)(2)]

ii. Boiler Tune-Up Program

(a) A boiler tune-up program shall be implemented upon startup of your affected source. [40 CFR Part 63.11196(c)]

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- (b) Boiler #1 is not required to complete an initial performance tune-up or a Notification of Compliance Status because it is classified as a new source that has applicable work practice standards or management practices. [40 CFR Part 63.11210(f)]
- (c) 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 components of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; however, the burner must be inspected at least once every 72 months. [40 CFR Part 63.11223(b)(1) & 63.11223 (e)]
 - 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 air-to-fuel control system inspection until the next scheduled shutdown is permitted; however, the inspection must occur at least once every 72 months. [40 CFR Part 63.11223(b)(3) & 63.11223 (e)]
 - 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)]

(iii) Tune-ups and Compliance Reports:

- 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.

Boiler Category	Tune-Up Frequency
New Oil fired Boilers with a heat input capacity of \leq 5MMBtu/hr	Every 5 years

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

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2. The first 5-year tune-up shall be completed no later than 61 months after the initial startup. [40 CFR 63.11223(e)]
3. The tune-up compliance report shall be maintained every five years 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)] 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 JJJJJJ 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.

If McCrum becomes exempt to 40 CFR Part 63, Subpart JJJJJJ by switching the fuel source to natural gas and becoming classified as a gas-fired boiler, the facility shall submit a notification which provides notice of the date upon which the fuels were switched. The notification must identify the name of the owner or operator of the affected source, the location of the source, the boiler that has switched fuels, the date of the notice, and the date upon which the fuel switch occurred. [40 CFR §63.11225(g)]

C. Oven

McCrum operates one oven for baking potatoes, capable of firing propane and natural gas. The oven is rated at 6.5 MMBtu/hr and was installed in 2002. The oven exhausts through its own stack, designated Stack #3.

The oven is not a steam generating unit and therefore is not subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*.

1. BACT Findings

The BACT emission limits for the oven were based on the following:

Propane

PM/PM₁₀ – Emissions are regulated by 06-096 CMR 103, *Fuel Burning Equipment Particulate Emission Standard*, however, the BACT determined PM emission limit of 0.05 lb/MMBtu when firing propane is more stringent [06-096 CMR 115, BACT]

SO₂ – 0.018 lb/1000 gal: AP-42, Table 1.5-1, dated 7/08, based on an average sulfur content of propane set as 0.18 gr/100 ft³

NO_x – 13 lb/1000 gal: AP-42, Table 1.5-1, dated 7/08

CO – 7.5 lb/1000 gal: AP-42, Table 1.5-1, dated 7/08

VOC – 1.0 lb/1000 gal: AP-42, Table 1.5-1, dated 7/08

Opacity – Visible emissions from the oven firing propane shall not exceed an opacity of 10% on a 6-minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period.

Natural Gas

PM/PM₁₀ – Emissions are regulated by 06-096 CMR 103, *Fuel Burning Equipment Particulate Emission Standard*, however, the BACT determined PM emission limit of 0.05 lb/MMBtu when firing natural gas is more stringent [06-096 CMR 115, BACT]

SO₂ – 0.6 lb/MMscf, AP-42, Table 1.4-2, dated 7/98

NO_x – 100 lb/MMscf, AP-42, Table 1.4-1, dated 7/98

CO – 84 lb/MMscf, AP-42, Table 1.4-1, dated 7/98

VOC – 5.5 lb/MMscf, AP-42, Table 1.4-2, dated 7/98

Opacity – Visible emissions from the oven firing natural gas shall not exceed 10% opacity on a 6-minute block average, except for no more than one (1) six (6) minute block average in a 3-hour period.

The BACT emission limits for the oven are the following:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Oven - propane	0.33	0.33	0.01	0.93	0.54	0.07
Oven – natural gas	0.33	0.33	0.01	0.63	0.53	0.03

McCrum shall be limited to 400,000 gallons/yr of propane for the oven based on a calendar year.

2. Periodic Monitoring

Periodic monitoring for the oven shall include recordkeeping to document fuel use both on a monthly and calendar year basis. Documentation shall include the quantity and type of fuel used.

D. Degreaser Unit

McCrum operates a Safety Kleen degreaser unit that has a design capacity of 12 gallons. The degreaser unit is subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended) and records shall be kept documenting compliance.

E. Annual Emissions

1. Total Annual Emissions

Because emissions are dependent on the fuel being fired and McCrum has the licensed capability to fire #2 fuel oil and natural gas in Boiler #1 and propane and natural gas in the oven, the facility shall be restricted to the maximum annual emissions from the fuel which gives the highest tons per year quantity for each pollutant. The tons per year limits were calculated based on a maximum operation time of 8,760 hr/yr while firing #2 fuel oil and natural gas in Boiler #1 and while firing natural gas in the oven, and 400,000 gal/yr of propane for the oven. Due to these limitations, the highest emissions for Boiler #1 occur for PM, PM₁₀, SO₂ and NO_x when firing #2 fuel oil and CO and VOC when firing natural gas in the boiler. The highest emissions for the oven occur for all pollutants except VOC while firing natural gas due to the

unit being restricted in the amount of propane it can fire in a calendar year, but no established fuel cap while firing natural gas.

The resulting annual emissions limits for the facility based on a calendar year are as follows:

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

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boiler #1	1.5	1.5	9.2	2.6	1.5	0.1
Oven	1.4	1.4	0.1	2.8	2.3	0.2
Total TPY	2.9	2.9	9.3	5.4	3.8	0.3

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, McCrum 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

The level of ambient air quality impact modeling required for a minor source shall be determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient air quality impact analysis is not required for a minor source if the total emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

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<u>Pollutant</u>	<u>Tons/Year</u>
PM ₁₀	25
SO ₂	50
NO _x	50
CO	250

The total facility licensed emissions are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

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, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-830-71-D-R/M 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 Chapter 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-A. [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) **Boiler #1**

A. Fuel

1. Boiler #1 shall fire either #2 fuel oil or natural gas. [06-096 CMR 115, BACT]
2. Prior to January 1, 2016, any #2 fuel oil fired in the boiler shall be ASTM D396 compliant (max. sulfur content of 0.5% by weight). [06-096 CMR 115, BACT]
3. Beginning January 1, 2016, the facility, when not firing natural gas, shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm). [38 MRSA §603-A(2)(A)(3)]
4. Beginning January 1, 2018, the facility, when not firing natural gas, 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)]
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, BACT]

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

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1 - #2 fuel oil	PM	0.08	06-096 CMR 115, BACT
Boiler #1 - natural gas	PM	0.05	06-096 CMR 115, BACT

C. Emissions from the boiler when firing #2 fuel oil shall not exceed the following [06-096 CMR 115, BACT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.33	0.33	2.09	0.60	0.15	0.01

- D. Visible emissions from Boiler #1 when firing #2 fuel oil shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [06-096 CMR 101]
- E. Emissions from the boiler when firing natural gas shall not exceed the following [06-096 CMR 115, BACT]:

Emission Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.21	0.21	0.01	0.41	0.34	0.02

- F. Visible emissions from Boiler #1 when firing natural gas shall not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [06-096 CMR 101]

(17) **Oven**

A. Fuel

- 1. Total oven shall fire either propane or natural gas.
- 1. Total fuel use for the oven while firing propane shall not exceed 400,000 gal/yr of propane based on a calendar year.
- 2. Compliance shall be demonstrated by fuel records from the supplier showing the quantity and type of fuel delivered. Records of annual fuel use shall be kept on a monthly and calendar year basis.
 [06-096 CMR 115, BACT]

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

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Oven	PM	0.05	06-096 CMR 115, BACT

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

Emission Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Oven - propane	0.33	0.33	0.01	0.93	0.54	0.07
Oven – natural gas	0.33	0.33	0.01	0.63	0.53	0.03

- D. Visible emissions from the oven while firing either propane or natural gas shall not exceed 10% opacity on a 6-minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period. [06-096 CMR 101]

(18) **Parts Washer**

The parts washer at McCrum is subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended).

- A. McCrum shall keep records of the amount of solvent added to the parts washer. [06-096 CMR 115, BACT]
- B. The following are exempt from the requirements of 06-096 CMR 130 [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. McCrum 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]

Penobscot McCrum, LLC
Waldo County
Belfast, Maine
A-830-71-D-R/M

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**Departmental
Findings of Fact and Order
Air Emission License
After-the-Fact Renewal/
Minor Revision**

(19) **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]

(20) **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]

- (21) McCrum shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 27 DAY OF February, 2013.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:

Marc Allen Robert Cove for
PATRICIA W. AHO, COMMISSIONER

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.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 9/20/2012

Date of application acceptance: 9/26/2012

Date filed with the Board of Environmental Protection:

This Order prepared by Allison M. Hazard, Bureau of Air Quality.



