



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

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

**Departmental
Findings of Fact and Order
Part 70 Air Emission License
Amendment #2**

FINDINGS OF FACT

After review of the Part 70 License amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (the Department) finds the following facts:

I. REGISTRATION

A. Introduction

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

The Naval Computer and Telecommunications Area Master Station Atlantic Detachment (NCTAMS LANT DET, the Cutler facility, or Cutler) generates electricity from diesel engines to operate communications equipment and provide energy for space heating. The Cutler facility is an existing stationary source currently operating under a Part 70 License, A-210-70-D-R, issued June 19, 2012, and subsequently issued amendments. This facility is considered a Part 70 major stationary source, as defined in *Definitions Regulations*, 06-096 Code of Maine Rules (CMR) 100 (as amended).

Cutler has requested an extension of the due date for performing nitrogen oxides (NO_x) emissions testing on those engines which are required to be tested every three calendar years.

B. Emission Equipment

The stack testing schedule adjustment addressed in this Part 70 License Amendment is for the following emissions units: VLF-103-D#2, VLF-103-D#3, VLF-103-D#4, VLF-103-D#5, and VLF-103-D#6.

C. Application Classification

A Part 70 Administrative Revision is for license changes that correct typographical errors; change the name, address, or phone number of any person or facility identified in the Part 70 license or a similar administrative change at the Part 70 source; or result in more frequent monitoring, reporting, recordkeeping or testing requirements. As defined in 06-096 Code of Maine Rules (CMR) 100, a Part 70 Administrative Revision may also be used to incorporate the terms and conditions of a major New Source Review air license issued pursuant to 06-096 CMR 115 into a Part 70 license.

The requested revision to extend the stack testing due date for the affected units at the facility meets the definition of a Part 70 Administrative Revision and has been processed under *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended).

II. PART 70 ADMINISTRATIVE REVISION REQUEST

A. Description

Cutler has requested that the due date for performing NO_x emissions testing on the affected units be extended one year, moving the due date from the end of calendar year 2016 to the end of calendar year 2017. Results of testing conducted in 2013 document the engines operating well below the NO_x limits in the facility's air emission license. A project is currently underway to provide commercial power to the Cutler facility and is scheduled for completion by mid-2017. Once commercial power is in place, Cutler's large engines will become emergency stand-by units, making the recurring testing requirement unwarranted according to the current requirements. Reconsideration and possible revocation of the ongoing test requirement would need to be addressed in a future licensing action. However, the extension of the due date is reasonable and does not violate applicable federal or state requirements.

B. Best Practical Treatment

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 06-096 CMR 100 (as amended). BPT for licensed units was established in Air Emission License A-210-70-D-R (June 19, 2012) and subsequent amendments. A BPT analysis is not required for this requested license change, because no modifications to the facility will be made and no increases in emissions will result.

C. Facility Annual Emissions

The facility's annual emissions are not being revised with this amendment and shall remain as currently licensed.

ORDER

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

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

The Department hereby grants the Part 70 license amendment A-210-70-F-A pursuant to the requirements of 06-096 CMR 140 and subject to the specific conditions below.

Severability. The invalidity or unenforceability of any provision of this License Amendment or part thereof shall not affect the remainder of the provision or any other provisions. This License Amendment shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

The Department hereby grants the Part 70 License Amendment A-210-70-F-A pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 115 and subject to the conditions found in Air Emission License A-210-70-D-R, in amendment A-210-70-E-A, and the following conditions.

SPECIFIC CONDITIONS

This Part 70 license amendment establishes the following changes. All other conditions contained in the facility's Part 70 air emission license and subsequent amendments up to

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the date of issuance of this amendment shall remain in effect as written unless amended by a future licensing action.

Specific Condition (19)(C)(3) of Air Emission License Amendment A-210-70-E-A (September 6, 2013) shall be replaced with the following:

(19) NO_x RACT Requirements

C. Emissions Testing [06-096 CMR 140, BPT]

3. NO_x emissions testing conducted according to Method 7E of 40 CFR Part 60, Appendix A or other method as approved by the Department shall be performed before the end of calendar year 2017 for each of the units specified in the table above. If, after that time, commercial power is not connected and used by the Cutler facility such that the facility's large engines are for back-up emergency uses only, subsequent NO_x emissions testing shall be conducted once every third calendar year for each of the specified units. This does not preclude the Department or EPA from requiring additional testing if evidence indicates to the Department that equipment may be operating out of compliance with emission standards or license conditions.

DONE AND DATED IN AUGUSTA, MAINE THIS 3 DAY OF August, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Maic Allen Robert Core for
PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-210-70-D-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: June 19, 2015

Date of application acceptance: June 22, 2015

Date filed with the Board of Environmental Protection:

This Order prepared by Jane E. Gilbert, Bureau of Air Quality.

