



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

**New England Waste Services of ME, Inc.
d/b/a Pine Tree Landfill
Penobscot County
Hampden, Maine
A-850-77-8-M**

**Departmental
Findings of Fact and Order
New Source Review
NSR #6**

FINDINGS OF FACT

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

| | |
|--------------------|--|
| FACILITY | New England Waste Services of ME, Inc. d/b/a Pine Tree Landfill (PTL) |
| LICENSE TYPE | 06-096 CMR 115, Minor Revision |
| NAICS CODES | 562212 |
| NATURE OF BUSINESS | Solid Waste Landfill |
| FACILITY LOCATION | 358 Emerson Mill Road Hampden, Maine |

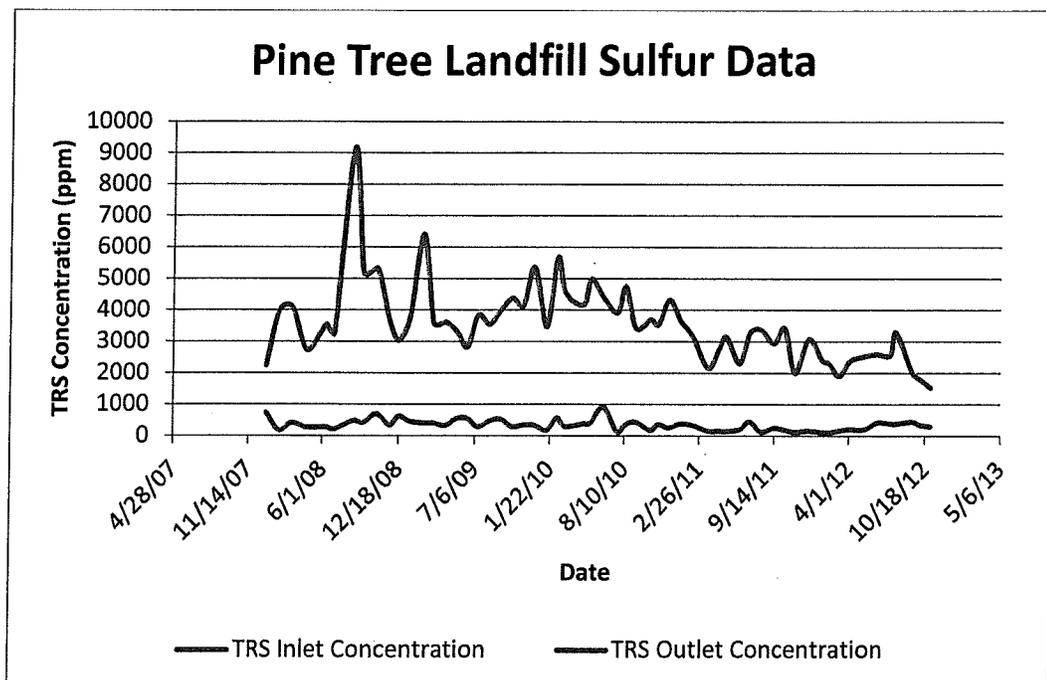
PTL is a closed, secure special waste landfill that accepted a variety of solid wastes. The landfill ceased accepting waste in 2010. Various sections of the landfill are equipped with an active gas extraction system designed for the collection and destruction of landfill through combustion. The primary combustion device is a landfill gas-to-energy (LFGTE) facility with three Jenbacher (JGS 320) engines and a 90 MMBtu/hr utility flare available to combust gas if the collection rate exceeds the combustion capacity of the LFGTE facility (e.g. during maintenance operations at the LFGTE facility).

B. Revision Description

New Source Review Amendment #A-850-77-7-A was issued to PTL on February 18, 2011. This amendment addressed the leachate recirculation project and also established landfill gas (LFG) sampling and testing requirements.

PTL ceased accepting solid waste and completed closure of the landfill in 2010. However, PTL has continued to operate the LFG collection and treatment system and to combust LFG in either the Landfill Gas to Energy (LFGTE) engines or flare.

PTL has two years of operational data showing stabilized sulfur levels in the LFG both prior to and post treatment. The chart below shows the monthly average TRS inlet and outlet concentrations from the LFG scrubbing system.



PTL has therefore requested a reduction in the sulfur sampling frequency requirements found in NSR Amendments A-850-77-3-A and A-850-77-7-A.

PTL has proposed reducing the requirement to monitor for H_2S from twice daily every day to twice daily two times per week and reducing the requirement to sample for total reduced sulfur (TRS) from two days monthly to one. This change is warranted based on the amount of data showing stabilized conditions in the LFG and control equipment and would also bring PTL's license into alignment with monitoring requirements at other similar facilities.

C. Application Classification

The application for PTL does not violate any applicable federal or state requirements. It does request a reduction in monitoring, reporting, testing or record keeping. There are no expected emissions increases of any regulated

pollutant due to this modification. Therefore, this amendment is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 CMR 115 (as amended) since the changes being made are not addressed or prohibited in the Part 70 air emission license. An application to incorporate the requirements of this amendment into the Part 70 air emission license was included with the NSR application.

ORDER

The Department hereby grants Air Emission License Minor Revision A-850-77-8-M pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the standard and special conditions below.

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

Condition (1)(D) of New Source Review Amendment A-850-77-4-M is determined to be obsolete and is therefore Deleted.

The following shall replace Condition (4) of New Source Review Amendment A-850-77-3-A:

(4) Monitoring Requirements

The following are identified as Periodic Monitors:

1. Maintenance performed on each engine;
2. Monthly operating time for each engine;
3. Monthly gas flow to the flare;
4. Monthly gas flow to the engines.
5. H₂S concentration and gas flow rate entering TRS control equipment.
6. H₂S concentration and gas flow rate exiting TRS control equipment.
7. Calibration of H₂S analyzers and flow monitors twice per year.

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A-850-77-8-M

4

Departmental
Findings of Fact and Order
New Source Review
NSR #6

The following shall replace Condition (6)(C) of New Source Review Amendment A-850-77-7-A:

(6) SO₂ Emissions

- C. Compliance with the SO₂ lb/hr limit and the ppm limit shall be based on sampling of the landfill gas entering and exiting the TRS control equipment three times on one day per month (i.e. three samples at the inlet to the scrubber and three samples at the scrubber outlet) using a test method approved by the Department. PTL shall record the gas flow rate on the days of sampling events. The average of the three inlet samples and three outlet samples shall determine the result for that month. It will be assumed that all remaining sulfur in the landfill gas is converted to SO₂ and emissions calculated accordingly. Compliance with the SO₂ lb/hr limit and the ppm limit shall be based on a 12-month rolling average.
[06-096 CMR 115, BACT]

The following are New Conditions:

- (1) PTL shall sample the landfill gas H₂S concentration twice in the same day (morning and afternoon, with at least four hours between the two sample times) using colorimetric tubes and average the samples for that day. This sampling method shall occur at least two times per week with at least three days between samples. The colorimetric tube data shall be used as an operational tool and not for determining compliance with numerical emission limits. [06-096 CMR 115, BACT]

DONE AND DATED IN AUGUSTA, MAINE THIS 11th DAY OF February, 2013.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 1/9/13
Date of application acceptance: 1/10/13

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Poland, Bureau of Air Quality.

