



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017

DEPARTMENT ORDER

**Eurovia Atlantic Coast LLC  
Waldo County  
Belfast, Maine  
A-54-71-P-M**

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

**FINDINGS OF FACT**

After review of the air emission 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 (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

The Lane Construction Corporation was issued Air Emission License A-54-71-M-R/A on February 2, 2017, for the operation of emission sources associated with their hot mix asphalt facility. The license was subsequently transferred on April 18, 2019 (A-54-71-N-T) to Eurovia Atlantic Coast LLC (Eurovia) and further amended on December 10, 2020 (A-54-71-O-M) to remove a rock crusher and two engines.

The equipment addressed in this license amendment is located at 190 Swan Lake Avenue, Belfast, Maine.

Eurovia has requested a minor revision to their license in order to remove the HYCO 200 Hot Oil Heater. Additionally, the requirements of 06-096 C.M.R. ch. 101 will be updated to comply with its most recent revisions.

**B. Emission Equipment**

The following equipment is addressed in this air emission license amendment:

**Heating Equipment**

<b>Equipment</b>	<b>Max. Capacity (MMBtu/hr)</b>	<b>Maximum Firing Rate</b>	<b>Fuel Type</b>	<b>Date of Install.</b>
AC Heater	1.3	9.5	Distillate Fuel, Specification Waste Oil	Pre-1973
<i>HYCO 200 Hot Oil Heater *</i>	<i>2.0</i>	<i>14.6</i>	<i>Distillate Fuel, Specification Waste Oil</i>	<i>1999</i>

\* This equipment has been removed from this license.

**C. Application Classification**

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the date this license was issued.

This amendment will not increase licensed emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

**D. Facility Classification**

With the annual fuel limit on the AC Heater and the production limit on the asphalt plant, the facility is licensed as follows:

- As a synthetic minor source of air emissions for criteria pollutants, because Eurovia is subject to license restrictions that keep facility emissions below major source thresholds for CO; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

**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 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment.

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.

**B. HYCO 200 Hot Oil Heater and AC Heater**

Eurovia has transferred the HYCO 200 Hot Oil Heater to its Charlotte facility under Air Emission License A-978-71-H-R/A. All references for the HYCO 200 Hot Oil Heater will be removed from this air emission license.

On January 1, 2024, the applicable visible emissions standard for the AC Heater contained in 06-096 C.M.R. ch. 101 changed to the following:

Visible emissions from the AC Heater shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(2)]

**C. HMA Batch Plant #42**

On January 1, 2024, the applicable visible emissions standard for HMA Batch Plant #42 contained in 06-096 C.M.R. ch. 101 changed to the following:

1. Visible emissions from the baghouse are limited to no greater than 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(1)]
2. General process emissions from the hot mix asphalt plant shall be controlled so as to prevent visible emissions in excess of 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

**D. Fugitive Emissions**

On January 1, 2024, the applicable visible emissions standard for Fugitive Emissions contained in 06-096 C.M.R. ch. 101 changed to the following:

Eurovia shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.

Eurovia shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22. [06-096 C.M.R. ch. 101, § 4(C)]

This new fugitive visible emissions standard is considered more stringent than either the applicable requirement in the previous version of 06-096 C.M.R. ch. 101 or the BPT emission limit contained in Air Emission License A-91-70-A-I (issued September 5, 2001), and only this more stringent standard shall be included in the Order of this air emission license.

**E. General Process Sources**

On January 1, 2024, the applicable visible emissions standard for General Process Sources contained in 06-096 C.M.R. ch. 101 changed to the following:

Visible emissions from any general process source shall not exceed 20% on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

**F. Annual Emissions**

This license amendment will not change the facility's licensed annual emissions.

**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 Amendment A-54-71-P-M subject to the conditions found in Air Emission License A-54-71-M-R/A, in amendments A-54-71-N-T and A-54-71-O-M, and the following conditions.

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.

**SPECIFIC CONDITIONS**

**The following shall replace Conditions (16)(G) and (H) of Air Emission License A-54-71-M-R/A:**

**(16) HMA Batch Plant #42**

- G. Visible emissions from the baghouse are limited to no greater than 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(1)]
- H. General process emissions from the hot mix asphalt plant shall be controlled so as to prevent visible emissions in excess of 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

**The following shall replace Conditions (19), (20), and (21) of Air Emission License A-54-71-M-R/A:**

**(19) AC Heater**

**A. Fuel**

1. The AC Heater is licensed to fire specification waste oil with a maximum sulfur content of 0.7% by weight. [06-096 C.M.R. ch. 115, BPT]
2. Total fuel use for the AC Heater shall not exceed 30,000 gal/yr of distillate fuel and specification waste oil, on a calendar year total basis. 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 C.M.R. ch. 115, BPT]
3. The facility shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [06-096 C.M.R. ch. 115, BPT]
4. Compliance shall be demonstrated by fuel records showing the quantity, type, and the percent sulfur of the fuel delivered. Records of annual fuel use shall be kept on a monthly and calendar year basis. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier, a statement from the supplier that the fuel delivered meets Maine's fuel sulfur content standards, certificate of analysis, or testing of fuel in the tank on-site. [06-096 C.M.R. ch. 115, BPT]
5. A log shall be maintained recording the quantity and analyzed test results of all specification waste oil fired in the AC Heater. [06-096 C.M.R. ch. 115, BPT and 06-096 C.M.R. ch. 860]

**B. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:**

<b>Unit</b>	<b>PM (lb/hr)</b>	<b>PM<sub>10</sub> (lb/hr)</b>	<b>PM<sub>2.5</sub> (lb/hr)</b>	<b>SO<sub>2</sub> (lb/hr)</b>	<b>NO<sub>x</sub> (lb/hr)</b>	<b>CO (lb/hr)</b>	<b>VOC (lb/hr)</b>
AC Heater	0.11	0.11	0.11	0.94	0.19	0.05	0.01

**C. Visible emissions from the AC Heater shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(2)]**

**(20) Fugitive Emissions**

- A. Eurovia shall not cause emissions of any fugitive dust during any period of construction, reconstruction, or operation without taking reasonable precautions. Such reasonable precautions shall be included in the facility's continuing program of best management practices for suppression of fugitive particulate matter. See 06-096 C.M.R. ch. 101, § 4(C) for a list of potential reasonable precautions.**

B. Eurovia shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22. [06-096 C.M.R. ch. 101, § 4(C)]

**(21) General Process Sources**

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

**The following is a new condition of Air Emission License A-54-71-M-R/A:**

- (25) If the Department determines that any parameter value pertaining to construction and operation of the emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, Eurovia may be required to submit additional information. Upon written request from the Department, Eurovia shall provide information necessary to demonstrate AAQS will not be exceeded, potentially including submission of an ambient air quality impact analysis or an application to amend this air emission license to resolve any deficiencies and ensure compliance with AAQS. Submission of this information is due within 60 days of the Department's written request unless otherwise stated in the Department's letter. [06-096 C.M.R. ch. 115, § 2(O)]

DONE AND DATED IN AUGUSTA, MAINE THIS 27<sup>th</sup> DAY OF JUNE, 2025.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for  
MELANIE LOYZIM, COMMISSIONER

**The term of this license amendment shall be ten (10) years from the issuance of Air Emission License A-54-71-M-R/A (issued 2/2/2017).**

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 3/14/25

Date of application acceptance: 3/17/25

This Order prepared by Chris Ham, Bureau of Air Quality.