STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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DEPARTMENT ORDER

St. Mary's Regional Medical Center Androscoggin County Lewiston, Maine A-146-71-R-R	**Departmental Findings of Fact and Order Air Emission License After-the-Fact Renewal**

FINDINGS OF FACT

After review of the air emission license renewal 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 Air Emission License for St. Mary's Regional Medical Center (St. Mary's) expired on December 14, 2025. St. Mary's applied after that date to renew their license for the operation of emission sources associated with their healthcare facility.

The equipment addressed in this license is located at 93 Campus Ave, Lewiston, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Central Plant Boiler #1	6.1	43.6 gal/hr 5,900 scf/hr	Distillate Fuel Natural Gas	1999	2000	1
Central Plant Boiler #2	14.3	102 gal/hr 14,000 scf/hr	Distillate Fuel Natural Gas	1999	2000	1
Central Plant Boiler #3	14.3	102 gal/hr 14,000 scf/hr	Distillate Fuel Natural Gas	1999	2000	1

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Central Plant Boiler #4	14.3	102 gal/hr 14,000 scf/hr	Distillate Fuel Natural Gas	1999	2000	1
D'Youville Boiler #1	3.35	25 gal/hr 3,200 scf/hr	Distillate Fuel Natural Gas	2006	2006	2
D'Youville Boiler #2	3.35	25 gal/hr 3,200 scf/hr	Distillate Fuel Natural Gas	2006	2006	3

Stationary Engines

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (HP)	Fuel Type	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.
Central Plant Gen #1	7.8	800	Distillate Fuel	56.9 gal/hr	2000	2000
Central Plant Gen #2	7.8	800	Distillate Fuel	56.9 gal/hr	2000	2000
D'Youville Pavilion Generator	1.46	150	Distillate Fuel	10.7 gal/hr	1984	1984
Maison Marcotte Generator	1.46	180	Distillate Fuel	10.7 gal/hr	2015	2015
D'Youville Pavilion CoGen Unit	1.46	150	Natural Gas	1450 scf/hr	2015	2015

C. Definitions

Distillate Fuel means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;
- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

Records or *Logs* mean either hardcopy or electronic records.

D. 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.

The previous air emission license for St. Mary's expired on December 14, 2025. A complete application was not submitted prior to the expiration date; therefore, St. Mary's is considered to be an existing source applying for an after-the-fact renewal. 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 Code of Maine Rules (C.M.R.) ch. 115.

E. Facility Classification

With the annual fuel limit on all six boilers and the operating hours restriction on the emergency generators, the facility is licensed as follows:

- As a synthetic minor source of air emissions for criteria pollutants, because St. Mary's is subject to license restrictions that keep facility emissions below major source thresholds for NO_x; 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 an after-the-fact renewal requires an analysis similar to a Best Available Control Technology analysis pursuant to 06-096 C.M.R. ch. 115.

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. Central Plant Boilers #1-#4, and D'Youville Boilers #1 and #2

St. Mary's operates Central Plant Boilers #1-#4 for steam, heat, and sterilization of medical equipment. The boilers are rated at 6.1 MMBtu/hr, 14.3 MMBtu/hr, 14.3 MMBtu/hr, and 14.3 MMBtu/hr, respectively, and all four can fire distillate fuel or natural gas. The boilers were all installed in 2000 and exhaust through a shared stack, Stack #1.

St. Mary's operates D'Youville Boilers #1 and #2 for steam and heat. The boilers are rated at 3.35 MMBtu/hr each, and fire distillate fuel or natural gas. The boilers were installed in 2006 and exhaust through separate stacks, Stack #2 and #3, respectively.

With limited exceptions, no person shall import, distribute, or offer for sale any distillate fuel with a sulfur content greater than 0.0015% by weight (15 ppm) pursuant to 38 M.R.S. § 603-A(2)(A)(3). Therefore, the distillate fuel purchased or otherwise obtained for use in Central Plant Boilers #1-#4 and D'Youville Boilers #1 and #2 shall not exceed 0.0015% sulfur by weight (15 ppm).

1. BPT Findings

An analysis for controls of emissions from Central Plant Boilers #1-#4 and D'Youville Pavilion Boilers #1 and #2 is summarized below.

a. Particulate Matter (PM, PM_{10}, $PM_{2.5}$)
St. Mary's burns only natural gas in the boilers to minimize PM emissions.

BPT for PM/PM_{10}/$PM_{2.5}$ emissions from the boilers is the combustion of natural gas and the emission limits listed in the tables below.

b. Sulfur Dioxide (SO_2)
St. Mary's fires only natural gas, which has inherently low sulfur content.

BPT for SO_2 emissions from the boilers is the use of natural gas and the emission limits listed in the tables below.

c. Nitrogen Oxides (NO_x), Carbon Monoxide (CO), and Volatile Organic Compounds (VOC)
Possible add-on NO_x controls include SCR, SNCR, or oxidation catalysts. Due to the small size of the unit and anticipated NO_x, CO, and VOC emissions, additional controls are not economically infeasible.

BPT for NO_x, CO, and VOC emissions from the boilers is good combustion practices and the emission limits listed in the tables below.

The BPT emission limits for Central Plant Boilers #1-#4 and D'Youville Boilers #1 and #2 were based on the following:

Distillate Fuel

$PM/PM_{10}/PM_{2.5}$ – 0.08 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT
SO_2 – based on firing distillate fuel with a maximum sulfur content of 0.0015% by weight
NO_x – 20 lb/1,000 gal based on AP-42 Table 1.3-1 dated 5/10
CO – 5 lb/1,000 gal based on AP-42 Table 1.3-1 dated 5/10
VOC – 0.34 lb/1,000 gal based on AP-42 Table 1.3-3 dated 5/10
Visible Emissions – 06-096 C.M.R. ch. 101

Natural Gas

$PM/PM_{10}/PM_{2.5}$ – 0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT
SO_2 – 0.6 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
NO_x – 100 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
CO – 84 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
VOC – 5.5 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
Visible Emissions – 06-096 C.M.R. ch. 101

The BPT emission limits for Central Plant Boilers #1-#4, and D'Youville Boilers #1 and #2 are the following:

Unit	Fuel	Pollutant	lb/MMBtu
Central Plant Boiler #1-#4	Distillate Fuel	PM	0.08
Central Plant Boiler #1-#4	Natural Gas	PM	0.05
D'Youville Boilers #1 and #2	Distillate Fuel	PM	0.08
D'Youville Boilers #1 and #2	Natural Gas	PM	0.05

Unit	Fuel	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Central Plant Boiler #1	Distillate Fuel	0.49	0.49	0.49	0.01	0.87	0.22	0.01
Central Plant Boiler #1	Natural Gas	0.31	0.31	0.31	--	0.59	0.50	0.03
Central Plant Boilers #2-#4 [each]	Distillate Fuel	1.14	1.14	1.14	0.02	2.04	0.51	0.02
Central Plant Boilers #2-#4 [each]	Natural Gas	0.72	0.72	0.72	0.01	1.39	1.17	0.08
D'Youville Pavilion Boilers #1&#2	Distillate Fuel	0.27	0.27	0.27	0.01	0.48	0.12	0.01
D'Youville Pavilion Boilers #1&#2	Natural Gas	0.17	0.17	0.17	--	0.33	0.27	0.02

Central Plant Boilers #1-#4 shall have a combined fuel use limit of 550,000 gallons per year of distillate fuel fired on a calendar year basis.

D'Youville Boilers #1 and #2 shall have a combined fuel use limit of 150,000 gallons per year of distillate fuel fired on a calendar year basis.

St. Mary's shall be limited to a facility-wide fuel use limit of 200 MMscf per year of natural gas on a calendar year total basis. This limit applies to licensed emission units only and excludes insignificant activities.

2. Visible Emissions

Firing Distillate Fuel
Visible emissions from the boilers when firing distillate fuel shall not exceed 20% opacity on a six-minute block average basis.

Firing Natural Gas
Visible emissions from the boilers when firing natural gas shall not exceed 10% opacity on a six-minute block average basis.

3. Periodic Monitoring

Periodic monitoring for Central Plant Boilers #1-#4, and D'Youville Boilers #1 and #2 shall include recordkeeping to document fuel use both on a monthly and calendar year total basis. Documentation shall include the type of fuel used and sulfur content of the fuel, if applicable.

4. New Source Performance Standards (NSPS): 40 C.F.R. Part 60, Subpart Dc

Due to their size, Central Plant Boiler #1 and D'Youville Boilers #1 and #2 are **not** subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr manufactured after June 9, 1989. Central Plant Boilers #2, #3, and #4 meet the criteria for both size and date of manufacture and therefore are subject to 40 C.F.R. Part 60, Subpart Dc. [40 C.F.R. § 60.40c]

St. Mary's shall comply with all requirements of 40 C.F.R. Part 60, Subpart Dc applicable to Central Plant Boilers #2, #3, and #4 including, but not limited to, the following:

a. Notifications

St. Mary's was required to submit notification to EPA and the Department of the date of construction, anticipated start-up, and actual start-up. This

notification shall include the design heat input capacity of the boiler and the type of fuel to be combusted. [40 C.F.R. § 60.48c(a)]

The notification was required when the boilers were first started, and per Standard Condition (8), record retention is only required for the previous six (6) years. The retention period for the initial notification has since passed.

b. Sulfur Dioxide (SO_2)

The fuel fired in Central Plant Boilers #2, #3, and #4 shall not exceed 0.5% sulfur by weight. [40 C.F.R. § 60.42c(d)]
State statute requires distillate fuel with a sulfur content not to exceed 0.0015% by weight. Therefore, the fuel sulfur content requirement of Subpart Dc is met by compliance with the more stringent State requirement.

c. Reporting and Recordkeeping

(1) St. Mary's shall maintain records of the amounts of each fuel combusted during each month with records of fuel certifications. [40 C.F.R. § 60.48c(g)]

(2) St. Mary's shall submit semi-annual reports to EPA and to the Department. [40 C.F.R. § 60.48c(d)] These reports shall include the following:

(i) Calendar dates covered in the reporting period; [40 C.F.R. § 60.48c(e)(1)]
(ii) Records of fuel supplier certifications; [40 C.F.R. § 60.48c(e)(11)] and
(iii) Any instances of excess emissions (including opacity) from Central Plant Boilers #2, #3, and #4. [40 C.F.R. § 60.48c(c)]

(3) The semi-annual reports are due within 30 days of the end of each six-month period. [40 C.F.R. § 60.48c(j)]

(4) The following address shall be used for any reports or notifications required to submit to EPA:

U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100 (OES04-2)
Boston, MA 02109-3912
Attn: Air Compliance Clerk

(5) St. Mary's shall maintain records required by Subpart Dc for a period of two years following the date of the record. [40 C.F.R. § 60.48c(i)] Note: Standard Condition (8) of this license requires all records be retained for six years; therefore, the two-year record retention requirement of Subpart Dc is satisfied by compliance with the more stringent six-year requirement.

5. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart JJJJJJ

Central Plant Boilers #1-#4 and D'Youville Pavilion Boilers #1 and #2 are not subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ. Central Plant Boiler #1, and D'Youville Boilers #1 and #2 are considered existing gas-fired boilers rated less than 10 MMBtu/hr, and Central Plant Boilers #2, #3, and #4 are considered existing gas-fired boilers rated greater than 10 MMBtu/hr. [40 C.F.R. §§ 63.11193 and 63.11195]

Gas-fired boilers are exempt from 40 C.F.R. Part 63, Subpart JJJJJJ. However, boilers which fire fuel oil are not. 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 C.F.R. § 63.11237]

In order to maintain the classification of gas-fired boilers, St. Mary's may only fire distillate fuel in Central Plant Boilers #1-#4 and D'Youville Pavilion Boilers #1 and #2 during periods of gas curtailment or supply interruption (as defined in 40 C.F.R. § 63.11237 "Period of gas curtailment or supply interruption"), startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

For each of these six boilers, St. Mary's shall maintain records of the duration of each time distillate fuel was fired in the boiler and the reason why, such as the possible reasons described in the previous paragraph.

Any boiler designed to burn fuels besides gaseous fuels prior to June 4, 2010, is considered an existing boiler under this rule. A boiler which currently fires gaseous fuels but converts back to firing another fuel (such as distillate fuel) in the future would become subject as an existing boiler at the time it is converted back to oil.

C. Central Plant Generators #1 & #2, and D'Youville Pavilion Generator [Pre-2006 Engines]

St. Mary's operates three emergency generators that were manufactured prior to 2006. The emergency generators are generator sets with each gen set consisting of an engine and an electrical generator. Central Plant Generators #1 and #2 and D'Youville Pavilion Generator have engines rated at 7.8 MMBtu/hr, 7.8 MMBtu/hr, and 1.46 MMBtu/hr, respectively, and all fire distillate fuel. The emergency generators were manufactured in 2000, 2000, and 1984, respectively.

1. BPT Findings

An analysis for control of emissions for Central Plant Generators #1 and #2 and D'Youville Pavillion Generator is summarized below.

a. Particulate Matter (PM, PM_{10}, $PM_{2.5}$)
St. Mary's burns only low-ash content fuel, distillate fuel, in these engines. Additional add-on pollution controls are not economically feasible.

BPT for PM/PM_{10}/$PM_{2.5}$ emissions from Central Plant Generators #1 and #2 and D'Youville Pavillion Generator is the use of ultra-low-sulfur distillate fuel and emission limits listed in the tables below.

b. Sulfur Dioxide (SO_2)
St. Mary's fires only distillate fuel with a sulfur content not to exceed 0.0015% by weight. The use of this fuel results in minimal emissions of SO_2, and additional add-on pollution controls are not economically feasible.

BPT for SO_2 emissions from Central Plant Generators #1 and #2 and D'Youville Pavillion Generator is the use of ultra-low-sulfur distillate fuel and the emission limits listed in the tables below.

c. Nitrogen Oxides (NO_x)
Possible control strategies for the control of NO_x include Selective Catalytic Reduction (SCR), Selective Non-Catalytic Reduction (SNCR), and proper operation and maintenance of the engines.

Both SCR and SNCR are technically feasible control technologies for minimizing NO_x. Both methods include injection of a NO_x reducing agent, typically ammonia or urea, where the reagent reacts with NO_x to form nitrogen and water. Each technology is effective within a specific temperature range, 500 – 1,200 °F for SCR and 1,400 – 1,600 °F for SNCR. However, both SCR and SNCR have the negative environmental impact of

emissions of unreacted ammonia. In addition, due to the initial capital cost and the annual operating costs, these systems are typically only considered cost effective for units larger than these emergency engines.

BPT for NO_x emissions from Central Plant Generators #1 and #2 and D'Youville Pavillion Generator is the proper operation and maintenance of the engines and the emission limits listed in the tables below.

d. Carbon Monoxide (CO) and Volatile Organic Compounds (VOC)
Potential control strategies for the control of CO and VOC include oxidation catalysts and thermal oxidizers.

Oxidation catalysts and thermal oxidizers both have high capital, maintenance, and operational costs considering the size and duration of use of the engines in question. These controls were determined to be economically infeasible.

BPT for CO and VOC emissions from Central Plant Generators #1 and #2 and D'Youville Pavillion Generator is the emission limits listed in the tables below.

The BPT emission limits for Central Plant Generators #1 and #2, and D'Youville Pavilion Generator are based on the following:

Central Plant Generators #1 and #2

$PM/PM_{10}/PM_{2.5}$	–	0.12 lb/MMBtu based on 06-096 C.M.R. ch. 103
SO_2	–	Combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
NO_x	–	3.2 lb/MMBtu from AP-42 Table 3.4-1 dated 4/25
CO	–	0.85 lb/MMBtu from AP-42 Table 3.4-1 dated 4/25
VOC	–	0.09 lb/MMBtu from AP-42 Table 3.4-1 dated 4/25
Visible Emissions	–	06-096 C.M.R. ch. 101

D'Youville Pavilion Generator

$PM/PM_{10}/PM_{2.5}$	–	0.31 lb/MMBtu from AP-42 Table 3.3-1 dated 4/25
SO_2	–	Combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
NO_x	–	4.41 lb/MMBtu from AP-42 Table 3.3-1 dated 4/25
CO	–	0.95 lb/MMBtu from AP-42 Table 3.3-1 dated 4/25
VOC	–	0.36 lb/MMBtu from AP-42 Table 3.3-1 dated 4/25
Visible Emissions	–	06-096 C.M.R. ch. 101

The BPT emission limits for Central Plant Generators #1 and #2 and D'Youville Pavilion Generator are the following:

Unit	Pollutant	lb/MMBtu
Central Plant Generator #1	PM	0.12
Central Plant Generator #2	PM	0.12

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Central Plant Generator #1	0.94	0.94	0.94	0.01	24.96	6.63	0.70
Central Plant Generator #2	0.94	0.94	0.94	0.01	24.96	6.63	0.70
D'Youville Pavilion Generator	0.45	0.45	0.45	--	6.44	1.39	0.53

Visible emissions from each of Central Plant Generators #1 and #2 and D'Youville Pavilion Generator shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time Facility shall either meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard.

a. The duration of the startup shall not exceed 30 minutes per event;
b. Visible emissions shall not exceed 50% opacity on a six-minute block average basis; and
c. St. Mary's shall keep records of the date, time, and duration of each startup.

Use of the work practice standards and alternative visible emissions standard in lieu of the normal operating standard is limited to no more than once per day.

Note: This does not limit the engine to one startup per day. It only limits the use of the alternative emission standard to once per day.

Each of the emergency generators shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. There is no limit on emergency operation. Each emergency generator shall be equipped with a non-resettable hour-meter to record operating time. To demonstrate compliance with the operating hours limit, St. Mary's shall keep records of the total hours of operation and the hours of emergency operation for each unit.

Emergency generators are only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. Emergency generators are not to be used for prime power when reliable offsite power is available; nor to operate or to be contractually obligated to be available 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.

2. Chapter 169

   Central Plant Generators #1 and #2 and D'Youville Pavilion Generator were installed prior to the effective date of *Stationary Generators*, 06-096 C.M.R. ch. 169 and are therefore exempt from this rule pursuant to section 1.

3. New Source Performance Standards (NSPS)

   Due to the dates of manufacture of the compression ignition emergency engines listed above, the engines are not subject to the New Source Performance Standards (NSPS) *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE),* 40 C.F.R. Part 60, Subpart IIII since the units were manufactured prior to April 1, 2006. [40 C.F.R. § 60.4200]

4. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart ZZZZ

   National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63, Subpart ZZZZ is **not** applicable to the emergency engines listed above. The units are considered existing, emergency stationary reciprocating internal combustion engines at an area HAP source. However, they are considered exempt from the requirements of 40 C.F.R. Part 63, Subpart ZZZZ since they are categorized as residential, commercial, or institutional emergency engine and they do not operate or are not contractually obligated to be available in a demand response program, during a period of deviation from standard voltage or frequency, or for supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in 40 C.F.R. § 63.6640(f)(4)(ii).

Operation of any emergency engine in a demand response program, during a period of deviation from standard voltage or frequency, or for supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in 40 C.F.R. § 63.6640(f)(4)(ii), would cause the engine to be subject to 40 C.F.R. Part 63, Subpart ZZZZ and require compliance with all applicable requirements of this subpart.

D. Maison Marcotte Generator and D'Youville Pavilion CoGen Unit [Post-2006 Engines]

St. Mary's operates two emergency generators that were manufactured after 2006. The emergency generators are generator sets with each gen set consisting of an engine and an electrical generator. The two units each have an engine rated at 1.46 MMBtu/hr, 1.46 MMBtu/hr, the Maison Marcotte Generator fires distillate fuel, while the D'Youville Pavilion CoGen Unit fires natural gas. These units were both manufactured in 2015.

1. BPT Findings

An analysis for control of emissions from Maison Marcotte Generator and D'Youville Pavillion CoGen Unit is summarized below.

a. Particulate Matter (PM, PM_{10}, $PM_{2.5}$)
St. Mary's burns only low-ash content fuels, natural gas and distillate fuel, in these engines. Additional add-on pollution controls are not economically feasible.

BPT for PM/PM_{10}/$PM_{2.5}$ emissions from Maison Marcotte Generator and D'Youville Pavillion CoGen Unit is the use of ultra-low-sulfur distillate fuel and natural gas and the emission limits listed in the tables below.

b. Sulfur Dioxide (SO_2)
St. Mary's fires natural gas and distillate fuel with a sulfur content not to exceed 0.0015% by weight. The use of this fuel results in minimal emissions of SO_2, and additional add-on pollution controls are not economically feasible.

BPT for SO_2 emissions from Maison Marcotte Generator and D'Youville Pavillion CoGen Unit is the use of natural gas and ultra-low-sulfur distillate fuel and the emission limits listed in the tables below.

c. Nitrogen Oxides (NO_x)
Possible control strategies for the control of NO_x include Selective Catalytic Reduction (SCR), Selective Non-Catalytic Reduction (SNCR), and proper operation and maintenance of the engines.

Both SCR and SNCR are technically feasible control technologies for minimizing NO_x. Both methods include injection of a NO_x reducing agent, typically ammonia or urea, where the reagent reacts with NO_x to form nitrogen and water. Each technology is effective within a specific temperature range, 500 – 1,200 °F for SCR and 1,400 – 1,600 °F for SNCR. However, both SCR and SNCR have the negative environmental impact of emissions of unreacted ammonia. In addition, due to the initial capital cost and the annual operating costs, these systems are typically only considered cost effective for units larger than these emergency engines.

BPT for NO_x emissions from Maison Marcotte Generator and D'Youville Pavillion CoGen Unit is the proper operation and maintenance of the engines and the emission limits listed in the tables below.

d. Carbon Monoxide (CO) and Volatile Organic Compounds (VOC)
Possible control strategies for the control of CO and VOC include oxidation catalysts and thermal oxidizers.

Oxidation catalysts and thermal oxidizers both have high capital, maintenance, and operational costs considering the size and duration of use of the engines in question. These controls were determined to be economically infeasible.

BPT for CO and VOC emissions from Maison Marcotte Generator and D'Youville Pavillion CoGen Unit is the emission limits listed in the tables below.

The BPT emission limits for Maison Marcotte Generator and D'Youville Pavilion CoGen Unit are based on the following:

Maison Marcotte Generator (Distillate Fuel-Fired)

$PM/PM_{10}/PM_{2.5}$	–	0.31 lb/MMBtu from AP-42 Table 3.3-1 dated 4/25
SO_2	–	Combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
NO_x	–	4.41 lb/MMBtu from AP-42 Table 3.3-1 dated 4/25
CO	–	0.95 lb/MMBtu from AP-42 Table 3.3-1 dated 4/25
VOC	–	0.36 lb/MMBtu from AP-42 Table 3.3-1 dated 4/25
Visible Emissions	–	06-096 C.M.R. ch. 115, BPT

D'Youville Pavilion CoGen Unit (Natural Gas-Fired)

$PM/PM_{10}/PM_{2.5}$ – 0.12 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT
SO_2 – 5.88×10^{-4} lb/MMBtu from AP-42 Table 3.2-3 dated 10/24
NO_x – 2.27 lb/MMBtu from AP-42 Table 3.2-3 dated 10/24
CO – 3.51 lb/MMBtu from AP-42 Table 3.2-3 dated 10/24
VOC – 2.96×10^{-2} lb/MMBtu from AP-42 Table 3.2-3 dated 10/24
Visible Emissions – 06-096 C.M.R. ch. 101

The BPT emission limits for the Maison Marcotte Generator and D'Youville Pavilion CoGen Unit are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Maison Marcotte Generator	0.45	0.45	0.45	--	6.44	1.39	0.53
D'Youville Pavilion CoGen Unit	0.18	0.18	0.18	--	3.31	5.12	0.04

Distillate Fuel-Fired

Visible emissions from the Maison Marcotte Generator shall not exceed 20% opacity on a six-minute block average basis.

BPT for the Maison Marcotte Generator includes recordkeeping of all maintenance conducted on each engine.

Natural Gas-Fired

Visible emissions from the D'Youville Pavilion CoGen Unit shall not exceed 10% opacity on a six-minute block average basis.

The Department has determined that the BPT visible emission limit is more stringent than the applicable limit in 06-096 C.M.R. ch. 101. Therefore, the visible emission limit for the D'Youville Pavilion CoGen Unit has been streamlined to the more stringent BPT limit, and only this more stringent limit shall be included in the Order of this air emission license.

2. Chapter 169

Maison Marcotte Generator and D'Youville Pavilion CoGen Unit were installed prior to the effective date of *Stationary Generators*, 06-096 C.M.R. ch. 169 and are therefore exempt from this rule pursuant to section 1.

3. New Source Performance Standards: Maison Marcotte Generator

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 C.F.R. Part 60, Subpart IIII is applicable to the Maison Marcotte Generator since the unit was ordered after July 11, 2005, and manufactured after April 1, 2006. [40 C.F.R. § 60.4200]

A summary of applicable federal 40 C.F.R. Part 60, Subpart IIII requirements is listed below.

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 60, Subpart IIII, a stationary reciprocating internal combustion engine (ICE) is considered an **emergency** stationary ICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under 40 C.F.R. Part 60, Subpart IIII, resulting in the engine being subject to requirements of this subpart applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

(i) An emergency engine may be operated for a maximum of 100 hours per calendar year for 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 more than 100 hours per calendar year.

(ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, 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.

[40 C.F.R. §§ 60.4211(f) and 60.4219]

b. 40 C.F.R. Part 60, Subpart IIII Requirements

(1) Manufacturer Certification Requirement
The engine shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in 40 C.F.R. § 60.4202. [40 C.F.R. § 60.4205(b)]

(2) Ultra-Low Sulfur Fuel Requirement
The fuel fired in the engine shall not exceed 15 ppm sulfur (0.0015% sulfur).
[40 C.F.R. § 60.4207(b)]

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 60.4209(a)]

(4) Operation and Maintenance Requirements

The engine shall be operated and maintained according to the manufacturer's emission-related written instructions. St. Mary's may only change those emission-related settings that are permitted by the manufacturer. [40 C.F.R. § 60.4211(a)]

St. Mary's shall have available for review by the Department a copy of the manufacturer's emission-related written instructions for engine operation and maintenance. [06-096 C.M.R. ch. 115, BPT]

(5) Annual Time Limit for Maintenance and Testing
As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, 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). [40 C.F.R. § 60.4211(f)]

(6) Initial Notification Requirement
No initial notification is required under 40 C.F.R. Part 60, Subpart IIII for emergency engines. [40 C.F.R. § 60.4214(b)]

(7) Recordkeeping
St. Mary's shall keep records that include the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 60.4214(b)]

4. New Source Performance Standards: D'Youville Pavilion CoGen Unit

Standards of Performance for Spark Ignition Internal Combustion Engines, 40 C.F.R. Part 60, Subpart JJJJ is applicable to the D'Youville Pavilion CoGen Unit since the unit was ordered after June 12, 2006, and manufactured after January 1, 2009. [40 C.F.R. § 60.4230]

A summary of applicable federal 40 C.F.R. Part 60, Subpart JJJJ requirements is listed below.

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 60, Subpart JJJJ, a stationary reciprocating internal combustion engine (ICE) is considered an emergency stationary ICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under 40 C.F.R. Part 60, Subpart JJJJ, resulting in the engine being subject to requirements of this subpart applicable to non-emergency engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

(i) An emergency engine may be operated for a maximum of 100 hours per calendar year for 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 more than 100 hours per calendar year.

(ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, 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.

[40 C.F.R. §§ 60.4243(d) and 60.4248]

b. 40 C.F.R. Part 60, Subpart JJJJ Requirements

(1) Manufacturer Certification Requirement
The engine shall be certified by the manufacturer as meeting the emission standards for new nonroad spark ignition engines found in 40 C.F.R. Part 60, Subpart JJJJ, Table 1. [40 C.F.R. § 60.4233]

(2) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 60.4237]

(3) Operation and Maintenance Requirement
The engine shall be operated and maintained according to the manufacturer's written instructions or procedures developed by St. Mary's that are approved by the engine manufacturer. St. Mary's may only change those settings that are permitted by the manufacturer. [40 C.F.R. § 60.4243]

St. Mary's shall have available for review by the Department a copy of the manufacturer's written instructions or procedures developed by St. Mary's that are approved by the engine manufacturer for engine operation and maintenance. [06-096 C.M.R. ch. 115, BPT]

(4) Annual Time Limit for Maintenance and Testing
As an emergency engine, the unit shall be limited to 100 hours/year for maintenance and testing. The emergency engine may operate up to

50 hours per year in non-emergency situations, but those 50 hours are included in the 100 hours total allowed for maintenance and testing. The 50 hours for non-emergency use cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 C.F.R. § 60.4243(d)]

(5) Recordkeeping

St. Mary's shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 60.4245(b)]

5. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart ZZZZ

Maison Marcotte Generator

Pursuant to 40 C.F.R. § 63.6590(c), stationary compression ignition engines subject to regulations under 40 C.F.R. Part 60, Subpart IIII must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 C.F.R. Part 60, Subpart IIII. No further requirements apply for such engines under Subpart ZZZZ. [40 C.F.R. § 63.6590(c)]

D'Youville Pavilion CoGen Unit

Pursuant to 40 C.F.R. § 63.6590(c), stationary spark ignition engines subject to regulations under 40 C.F.R. Part 60, Subpart JJJJ must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 C.F.R. Part 60, Subpart JJJJ. No further requirements apply for such engines under Subpart ZZZZ. [40 C.F.R. § 63.6590(c)]

E. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis.

F. Fugitive Emissions

St. Mary's 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.

St. Mary's 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.

G. Annual Emissions

The table below provides an estimate of facility-wide annual emissions for the purposes of calculating the facility's annual air license fee and establishing the facility's potential to emit (PTE). Only licensed equipment is included, i.e., emissions from insignificant activities are excluded. Similarly, unquantifiable fugitive particulate matter emissions are not included except when required by state or federal regulations. Maximum potential emissions were calculated based on the following assumptions:

- A facility-wide fuel use limit of 200 MMscf/yr of natural gas fired in all licensed boilers;
- Firing 550,000 gal/yr of distillate fuel in Central Plant Boilers #1, #2, #3, and #4;
- Firing 150,000 gal/yr of distillate fuel in D'Youville Boilers #1 and #2; and
- Operating each generator for 100 hrs/yr of non-emergency operation.

This information does not represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

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

	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	CO	VOC
Central Plant Boilers #1-#4 *Distillate Fuel*	3.1	3.1	3.1	0.1	5.5	1.4	0.1
D'Youville Boilers #1&#2 *Distillate Fuel*	0.8	0.8	0.8	--	1.5	0.4	--
All Boilers *Natural Gas*	5.2	5.2	5.2	0.1	10.0	8.4	0.6
Central Plant Generator #1	0.1	0.1	0.1	--	1.3	0.3	0.04
Central Plant Generator #2	0.1	0.1	0.1	--	1.3	0.3	0.04
D'Youville Pavilion Generator	--	--	--	--	0.3	0.1	0.03
Maison Marcotte Generator	--	--	--	--	0.3	0.1	0.03
D'Youville Pavilion CoGen Unit	--	--	--	--	0.2	0.3	--
Total TPY	**9.3**	**9.3**	**9.3**	**0.2**	**20.4**	**11.3**	**0.9**

Pollutant	Tons/year
Single HAP	7.9
Total HAP	19.9

III. AMBIENT AIR QUALITY ANALYSIS

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

Pollutant	Tons/Year
PM_{10}	25
$PM_{2.5}$	15
SO_2	50
NO_x	50
CO	250

The total licensed annual emissions for the facility 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.

This determination is based on information provided by the applicant regarding licensed emission units. If the Department determines that any parameter (e.g., stack size, configuration, flow rate, emission rates, nearby structures, etc.) deviates from what was included in the application, the Department may require St. Mary's to submit additional information and may require an ambient air quality impact analysis at that time.

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-146-71-R-R subject to the following conditions.

Severability. The invalidity or unenforceability of any provision of this License or part thereof 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. § 347-C).

(2) The licensee shall acquire a new or amended air emission license prior to beginning actual construction of a modification, unless specifically provided for in Chapter 115. [06-096 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 115]

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S. § 353-A. [06-096 C.M.R. ch. 115] Payment of the annual air emission license fee for St. Mary's is due by the end of May of each year. [38 M.R.S. § 353-A(3)]

(6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 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 C.M.R. ch. 115]

(11) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. 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 C.F.R. 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 C.M.R. ch. 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 the written test report by the Department, or another alternative timeframe approved by the Department, 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 C.F.R. 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 C.M.R. ch. 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 license requirement. [06-096 C.M.R. ch. 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 emissions 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 C.M.R. ch. 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 C.M.R. ch. 115]

(16) The licensee 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. § 605).

SPECIFIC CONDITIONS

(17) **Central Plant Boilers #1-#4 and D'Youville Pavilion Boilers #1 and #2**

A. Fuel

1. Total fuel use for Central Plant Boilers #1-#4 shall not exceed 550,000 gal/yr of distillate fuel, based on a calendar year total. [06-096 C.M.R. ch. 115, BPT]
2. Total fuel use for D'Youville Pavilion Boilers #1 and #2 shall not exceed 150,000 gal/yr of distillate fuel, based on a calendar year total. [06-096 C.M.R. ch. 115, BPT]
3. St. Mary's shall be limited to 200 MMscf/yr of natural gas to be fired in all boilers. [06-096 C.M.R. ch. 115, BPT]
4. St. Mary's 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]

5. Compliance shall be demonstrated by fuel records showing the quantity, type, and the percent sulfur of the fuel used (if applicable). 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]
6. Compliance for Central Plant Boilers #2, #3, and #4 shall be demonstrated with records of fuel supplier certification. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following:

Emission Unit	Fuel	Pollutant	lb/MMBtu
Central Plant Boilers #1-#4	Distillate Fuel	PM	0.08
Central Plant Boilers #1-#4	Natural Gas	PM	0.05
D'Youville Boilers #1 and #2	Distillate Fuel	PM	0.08
D'Youville Boilers #1 and #2	Natural Gas	PM	0.05

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

Unit	Fuel	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)
Central Plant Boiler #1	Distillate Fuel	0.49	0.49	0.49	0.01	0.87	0.22
Central Plant Boiler #1	Natural Gas	0.31	0.31	0.31	--	0.59	0.50
Central Plant Boilers #2-#4 [each]	Distillate Fuel	1.14	1.14	1.14	0.02	2.04	0.51
Central Plant Boilers #2-#4 [each]	Natural Gas	0.72	0.72	0.72	0.01	1.39	1.17
D'Youville Pavilion Boilers #1&#2	Distillate Fuel	0.27	0.27	0.27	0.01	0.48	0.12
D'Youville Pavilion Boilers #1&#2	Natural Gas	0.17	0.17	0.17	--	0.33	0.27

D. Visible Emissions

Firing Distillate Fuel

Visible emissions from Central Plant Boilers #1-#4, and D'Youville Pavilion Boilers #1 and #2 when firing distillate fuel shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(2)]

Firing Natural Gas

Visible emissions from Central Plant Boilers #1-#4, and D'Youville Pavilion Boilers #1 and #2, when firing natural gas shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(3)]

E. St. Mary's shall comply with all requirements of 40 C.F.R. Part 60, Subpart Dc applicable to Central Plant Boilers #2, #3, and #4 including, but not limited to, the following:

Reporting and Recordkeeping

a. St. Mary's shall maintain records of the amounts of each fuel combusted during each month with records of fuel certifications. [40 C.F.R. § 60.48c(g)]

b. St. Mary's shall submit semi-annual reports to EPA and to the Department. [40 C.F.R. § 60.48c(d)] These reports shall include the following:

(1) Calendar dates covered in the reporting period; [40 C.F.R. § 60.48c(e)(1)]
(2) Records of fuel supplier certifications; [40 C.F.R. § 60.48c(e)(11)] and
(3) Any instances of excess emissions (including opacity) from Central Plant Boilers #2, #3, and #4. [40 C.F.R. § 60.48c(c)]

c. The semi-annual reports are due within 30 days of the end of each six-month period. [40 C.F.R. § 60.48c(j)]

F. Operational Limitation [For dual fuel-fired boilers operating as gas-fired units]

St. Mary's may only fire distillate fuel in Central Plant Boilers #2, #3, and #4 during periods of gas curtailment or supply interruption (as defined in 40 C.F.R. § 63.11237 "Period of gas curtailment or supply interruption"), startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year. [06-096 C.M.R. ch. 115, BPT]

For each of these six boilers, St. Mary's shall maintain records of the duration of each time distillate fuel was fired in the boiler and the reason why, such as the possible reasons described in the previous paragraph. [06-096 C.M.R. ch. 115, BPT]

(18) **Central Plant Generators #1 & #2 and D'Youville Pavilion Generator [Pre-2006 Engines]**

A. Each of the emergency generators shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 115, BPT]

B. St. Mary's shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, the number of hours each unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [06-096 C.M.R. ch. 115, BPT]

C. The fuel sulfur content for Central Plant Generators #1 and #2 and D'Youville Pavilion Generator shall be limited to 0.0015% sulfur by weight. Compliance shall be demonstrated by fuel delivery receipts from the supplier, fuel supplier certification, certificate of analysis, or testing of the fuel in the tank on-site. [06-096 C.M.R. ch. 115, BPT]

D. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
Central Plant Generator #1	PM	0.12	06-096 C.M.R. ch. 103, § (2)(B)(1)(a)
Central Plant Generator #2	PM	0.12	06-096 C.M.R. ch. 103, § (2)(B)(1)(a)

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

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Central Plant Generator #1	0.94	0.94	0.94	0.01	24.96	6.63	0.70
Central Plant Generator #2	0.94	0.94	0.94	0.01	24.96	6.63	0.70
D'Youville Pavilion Generator	0.45	0.45	0.45	--	6.44	1.39	0.53

F. Visible Emissions

Visible emissions from each of the emergency generators shall not exceed 20% opacity on a six-minute block average basis except for periods of startup, during which time St. Mary's shall either meet the normal operating visible

emissions standard or the following work practice standards and alternative visible emissions standard.

1. The duration of the startup shall not exceed 30 minutes per event;
2. Visible emissions shall not exceed 50% opacity on a six-minute block average basis; and
3. St. Mary's shall keep records of the date, time, and duration of each startup.

Use of the work practice standards and alternative visible emissions standard in lieu of the normal operating standard is limited to no more than once per day.

Note: This does not limit the engine to one startup per day. It only limits the use of the alternative emission standard to once per day.

[06-096 C.M.R. ch. 101, § 4(A)(4)]

G. Emergency generators are only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. Emergency generators and/or fire pumps are not to be used for prime power when reliable offsite power is available; nor to operate or to be contractually obligated to be available 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. [06-096 C.M.R. ch. 115, BPT]

(19) **Maison Marcotte Generator and D'Youville Pavilion CoGen Unit [Post 2006 Engines]**

A. Each of the emergency generators shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 115, BPT]

B. St. Mary's shall keep records of all maintenance conducted on the engine associated with the Maison Marcotte Generator. [06-096 C.M.R. ch. 115, BPT]

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

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Maison Marcotte Generator	0.45	0.45	0.45	--	6.44	1.39	0.53
D'Youville Pavilion CoGen Unit	0.18	0.18	0.18	--	3.31	5.12	0.04

D. Visible Emissions

Maison Marcotte Generator: Distillate Fuel-Fired
Visible emissions from Maison Marcotte Generator shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(4)]

D'Youville Pavilion CoGen Unit: Naural Gas-Fired
Visible emissions from D'Youville Pavilion CoGen Unit shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

E. Maison Marcotte Generator shall meet the applicable requirements of 40 C.F.R. Part 60, Subpart IIII, including the following:[incorporated under 06-096 C.M.R. ch. 115, BPT]

1. Manufacturer Certification
   The engine shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in § 60.4202. [40 C.F.R. § 60.4205(b)]

2. Ultra-Low Sulfur Fuel
   The fuel fired in the engine shall not exceed 15 ppm sulfur (0.0015% sulfur). Compliance with the fuel sulfur content limit shall be demonstrated by fuel delivery receipts from the supplier, fuel supplier certification, certificate of analysis, or testing of the fuel in the tank on-site. [40 C.F.R. § 60.4207(b) and 06-096 C.M.R. ch. 115, BPT]

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 60.4209(a)]

4. Annual Time Limit for Maintenance and Testing

   a. As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, 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). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written log) of all engine operating hours. [40 C.F.R. § 60.4211(f) and 06-096 C.M.R. ch. 115, BPT]

b. St. Mary's shall keep records that include the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 60.4214(b)]

5. Operation and Maintenance
The engine shall be operated and maintained according to the manufacturer's emission-related written instructions. St. Mary's may only change those emission-related settings that are permitted by the manufacturer. [40 C.F.R. § 60.4211(a)]

St. Mary's shall have available for review by the Department a copy of the manufacturer's emission-related written instructions for engine operation and maintenance. [06-096 C.M.R. ch. 115, BPT]

F. D'Youville Pavilion CoGen Unit shall meet the applicable requirements of 40 C.F.R. Part 60, Subpart JJJJ, including the following: [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. Manufacturer Certification
The engine shall be certified by the manufacturer as meeting the emission standards for new nonroad spark ignition engines found in 40 C.F.R. Part 60, Subpart JJJJ, Table 1.

2. Non-Resettable Hour Meter
A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 60.4237 and 06-096 C.M.R. ch. 115, BPT]

3. Annual Time Limit for Maintenance and Testing

a. As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, 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). The limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written log) of all engine operating hours. [40 C.F.R. § 60.4243(d) and 06-096 C.M.R. ch. 115, BPT]

b. St. Mary's shall keep records that include maintenance conducted on the engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 60.4245(b)]

4. Operation and Maintenance
The engine shall be operated and maintained according to the manufacturer's written instructions or procedures developed by St. Mary's that are approved by the engine manufacturer. St. Mary's may only change those settings that are permitted by the manufacturer. [40 C.F.R. § 60.4243]

St. Mary's shall have available for review by the Department a copy of the manufacturer's emission-related written instructions for engine operation and maintenance. [06-096 C.M.R. ch. 115, BPT]

(20) **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)]

(21) **Fugitive Emissions**

A. St. Mary's 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. St. Mary's 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)]

(22) **Additional Information**

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, St. Mary's may be required to submit additional information. Upon written request from the Department, St. Mary's 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 4th DAY OF MAY, 2026.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:_____ for ____
MELANIE LOYZIM, COMMISSIONER

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

[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: 3/19/2026
Date of application acceptance: 3/19/2026

This Order prepared by Jack Doran, Bureau of Air Quality.