

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

DEPARTMENT ORDER

Maine Department of Corrections d/b/a Long Creek Youth Development Center Cumberland County South Portland, Maine A-321-71-O-R (SM)

Departmental
Findings of Fact and Order
Air Emission License
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

Maine Department of Corrections, d/b/a Long Creek Youth Development Center (Long Creek) has applied to renew their Air Emission License for the operation of emission sources associated with their South Portland facility.

The equipment addressed in this license is located at 675 Westbrook Street, South Portland, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

<u>Equipment</u>	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type, % sulfur	Date of Manuf.	Date of Install.	Stack #
Boiler #2 LCYDC	2.6	2,510 scf/hr	Natural Gas, negligible	2001	2001	5
Boiler #3 LCYDC	4.3	4,185 scf/hr	Natural Gas, negligible	2001	2001	5

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Generators

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (kW)	Fuel Type, % sulfur	Firing Rate (gal/hr)	Date of Manuf.	Date of <u>Install.</u>	Stack #
Purinton Hall Generator #1	1.2	126	Distillate Fuel, 0.0015%	8.0	1979	1979	1
LCYDC Generator #2	8.0	800	Distillate Fuel, 0.0015%	58.8	2000	2000	3
LCYCD Generator #3	8.0	800	Distillate Fuel, 0.0015%	58.8	2000	2000	4

C. Definitions

<u>Distillate Fuel</u>. For the purposes of this license, 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.

D. Application Classification

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

The application for Long Creek does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of currently licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115.

With the operating hours restriction on the emergency generators, the facility is licensed below the major source thresholds for criteria pollutants and is considered a synthetic minor.

With the operating hours restriction on the emergency generators, the facility is licensed below the major source thresholds for hazardous air pollutants (HAP) and is considered an area source of HAP.

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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.

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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. Boilers #2 and #3

Long Creek operates Boilers #2 and #3 for building heat and hot water. Boiler #2 is rated at 2.6 MMBtu per hr and fires natural gas at a maximum rate of 2,510 scf per hour. Boiler #3 is rated at 4.3 MMBtu per hour and fires natural gas at a maximum rate of 4,185 scf per hour. The boilers were both installed in 2001 and exhaust through a common stack, designated stack #5.

1. BPT Findings

The BPT emission limits for the boilers were based on the following:

Natural Gas

PM/PM₁₀ - 0.05 lb/MMBtu - based on 06-096 C.M.R. ch. 115, BPT SO₂ - 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 – 06-096 C.M.R. ch. 115, BPT

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The BPT emission limits for Boiler #3 are the following:

<u>Unit</u>	Pollutant	<u>Ib/MMBtu</u>
Boiler #3	PM	0.05

The BPT emission limits for Boilers #2 and #3 are the following:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #2	0.13	0.13	0.01	0.25	0.21	0.01
Boiler #3	0.22	0.22	0.01	0.42	0.35	0.02

Visible emissions from Stack #5 shall not exceed 10% opacity on a six-minute block average basis.

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

Due to their sizes and the fuel that they fire, Boilers #2 and #3 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. [40 C.F.R. § 60.40c]

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

Gas fired boilers are not subject to 40 C.F.R. Part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. For this reason, Boilers #2 and #3 are exempt from this regulation. [40 C.F.R. §§63.11193 and 63.11195]

C. Emergency Generators

Long Creek operates three emergency generators, all firing distillate fuel and exhausting through their own individual stacks. The emergency generators are generator sets with each set consisting of an engine and an electrical generator.

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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.

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Emergency Generators #1, #2 and #3 shall each be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. There is no limit on emergency operation. Each of the three emergency generators shall be equipped with non-resettable hour-meters to record their individual operating times. To demonstrate compliance with the operating hours limit, Long Creek shall keep records of the total hours of operation and the hours of emergency operation for each of these units.

1. Generator #1

Emergency Generator #1 in Purington Hall was manufactured and installed in 1979. Generator #1 has a rated output capacity of 126 kW. Its engine is rated at 1.2 MMBtu per hour and fires distillate fuel at a maximum rate of 8.0 gallons per hour.

BPT Findings

The BPT emission limits for Generator #1 are based on the following:

PM/PM₁₀ - 0.31 lb/MMBtu, based on AP-42 Table 3.3-1, dated 10/96
SO₂ - combustion of distillate fuel with a maximum sulfur content not to exceed ppm (0.0015% sulfur by weight)
NO_x - 4.41 lb/MMBtu from AP-42 Table 3.3-1, dated 10/96
CO - 0.95 lb/MMBtu from AP-42 Table 3.3-1, dated 10/96
VOC - 0.36 lb/MMBtu from AP-42 Table 3.3-1, dated 10/96
Visible - 06-096 C.M.R. ch. 115, BPT

Emissions

The BPT emission limits for Generator #1 are the following:

<u>Unit</u>	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
Generator #1 1.2 MMBtu/hr	0.37	0.37	0.01	5.29	1.14	0.43

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Visible emissions from Emergency Generator #1 shall not exceed 20% opacity on a six-minute block average basis.

2. Generators #2 and #3

Emergency Generators #2 and #3 were both manufactured and installed in 2000. They each have a rated output capacity of 800 kW, a maximum heat input capacity of 8.0 MMBtu per hour and a maximum firing rate of 58.8 gallons per hour.

BPT Findings

The BPT emission limits for Generators #2 and #3 are based on the following:

PM/PM₁₀ - 0.12 lb/MMBtu, based on 06-096 C.M.R. ch. 103, BPT

SO₂ - combustion of distillate fuel with a maximum sulfur content

not to exceed ppm (0.0015% sulfur by weight)

NO_x - 3.2 lb/MMBtu from AP-42 Table 3.4-1, dated 10/96 CO - 0.85 lb/MMBtu from AP-42 Table 3.4-1, dated 10/96 VOC - 0.09 lb/MMBtu from AP-42 Table 3.4-1, dated 10/96

Visible - 06-096 C.M.R. ch. 115, BPT

Emissions

The BPT emission limits for Generators #2 and #3 are the following:

<u>Unit</u>	Pollutant	lb/MMBtu
Generators #2 and #3	PM	0.12

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #2 8.0 MMBtu/hr	0.96	0.96	0.01	25.70	6.83	0.72
Generator #3 8.0 MMBtu/hr	0.96	0.96	0.01	25.70	6.83	0.72

Visible emissions from Emergency Generators #2 and #3 each shall not exceed 20% opacity on a six-minute block average basis.

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3. New Source Performance Standards (NSPS)

Due to the dates of manufacture of Emergency Generators #1, #2 and #3, 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 all 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 institutional emergency engines 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.

D. Annual Emissions

1. Total Annual Emissions

Long Creek shall be restricted to the following annual emissions, on a calendar year basis. The tons per year limits were calculated based on 8,760 operating hours for each of the two boilers, and 100 hours per year of operation for each emergency generator:

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Total Licensed Annual Emissions for the Facility Tons/year

(used to calculate the annual license fee)

	PM	<u>PM₁₀</u>	SO ₂	NO _x	CO	VOC
Boiler #2	0.57	0.57	0.01	1.10	0.92	0.06
Boiler #3	0.94	0.94	0.01	1.83	1.54	0.10
Generator #1	0.02	0.02	0.01	0.27	0.06	0.02
Generator #2	0.05	0.05	0.01	1.29	0.34	0.04
Generator #3	0.05	0.05	0.01	1.29	0.34	0.04
Total TPY	1.6	1.6	0.1	5.8	3.2	0.3

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's Approval and Promulgation of Implementation Plans, 40 C.F.R. Part 52, Subpart A, § 52.21, Prevention of Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in 06-096 C.M.R. ch. 100, are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

The quantity of CO₂e emissions from this facility is less than 100,000 tons per year, based on the following:

- worst case emission factors from the following sources: U.S. EPA's AP-42, the Intergovernmental Panel on Climate Change (IPCC), and *Mandatory Greenhouse Gas Reporting*, 40 C.F.R. Part 98; and
- global warming potentials contained in 40 C.F.R. Part 98.

No additional licensing actions to address GHG emissions are required at this time.

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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
SO ₂	50
NO _x	50
СО	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.

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-321-71-O-R subject to the following conditions.

<u>Severability</u>: 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.

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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 commencing 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]
- (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]

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- (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 such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 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

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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]

- Notwithstanding any other provisions in the State Implementation Plan approved by the (13)EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 C.M.R. ch. 115]
- The licensee shall maintain records of malfunctions, failures, downtime, and any other (14)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]
- Upon written request from the Department, the licensee shall establish and maintain such (15)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]

SPECIFIC CONDITIONS

(16)Boilers #2 and #3

A. Fuel

Boilers #2 and #3 shall each fire natural gas, and shall not exceed the following emission limits:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boilers #2 and #3	PM	0.05	06-096 C.M.R. ch. 115, BPT

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

Emission <u>Unit</u>	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #2	0.13	0.13	0.01	0.25	0.21	0.01
Boiler #3	0.22	0.22	0.01	0.42	0.35	0.02

C. Visible emissions from Stack #5 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

(17) Emergency Generators

- A. Each of the three 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. Long Creek shall keep records that include maintenance conducted on the engines and the hours of operation of each of the engines 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 Generators #1, #2 and #3 shall be limited to 0.0015% sulfur by weight. Compliance shall be demonstrated by fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 C.M.R. ch. 115, BPT]
- D. Emissions shall not exceed the following:

<u>Unit</u>	Pollutant	lb/MMBtu	Origin and Authority
Generators #2 and #3	PM	0.12	06-096 C.M.R. ch. 103, § (2)(B)(1)(a)

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

<u>Unit</u>	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #1 1.2 MMBtu/hr	0.37	0.37	0.01	5.29	1.14	0.43
Generator #2 8.0 MMBtu/hr	0.96	0.96	0.01	25.70	6.83	0.72
Generator #3 8.0 MMBtu/hr	0.96	0.96	0.01	25.70	6.83	0.72

F. Visible Emissions

Visible emissions from each of the distillate fuel-fired generators shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

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 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.

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(18) Long Creek shall notify the Department within 48 hours and submit a report to the Department on a <u>quarterly basis</u> if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S. § 605).

DONE AND DATED IN AUGUSTA, MAINE THIS /2 DAY OF December, 2017.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: PAUL MERCER COMMISSIONER

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: November 30, 2016

Date of application acceptance: December 6, 2016

Date filed with the Board of Environmental Protection:

This Order prepared by Patric J. Sherman, Bureau of Air Quality.

DEC 1 3 2017

State of Maine Board of Environmental Protection