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

DEPARTMENT ORDER

Kennebec River Development Park, LLC **Kennebec County** **Winslow, Maine** **A-800-71-F-R/A**	**Departmental** **Findings of Fact and Order** **Air Emission License** **Renewal and Amendment**

FINDINGS OF FACT

After review of the air emission license renewal with an amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes (M.R.S.) § 344 and § 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Kennebec River Development Park, LLC (KRDP) has applied to renew their Air Emission License for the operation of emission sources associated with their industrial storage and warehouse facility.

The equipment addressed in this license is located at 100 Benton Ave, Winslow, Maine.

KRDP has requested a minor revision to their license in order to replace two of their distillate fuel-fired heaters, reflect the change in sulfur content of the distillate fuel, and remove the distillate fuel use cap.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Air Heaters

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.
Air Heater #1	4.1	44 gal/hr	Propane	2000	2000
Air Heater #2	4.1	44 gal/hr	Propane	2000	2000
Air Heater #3	2.2	15.9 gal/hr	Distillate Fuel	2000	2000
Air Heater #4	1.3	9.0 gal/hr	Distillate Fuel	2000	2000
*Air Heater #5 **	*1.3*	*9.0 gal/hr*	*Distillate Fuel*	*2000*	*2000*
Air Heater #6	1.3	9.0 gal/hr	Distillate Fuel	2000	2000
Air Heater #7	1.3	9.0 gal/hr	Distillate Fuel	2000	2000
Air Heater #8	1.3	9.0 gal/hr	Distillate Fuel	2000	2000
*Air Heater #9 **	*1.3*	*9.0 gal/hr*	*Distillate Fuel*	*2000*	*2000*

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.
Air Heater #10	1.0	7.0 gal/hr	Distillate Fuel	2000	2000
Air Heater #11	1.0	7.0 gal/hr	Distillate Fuel	2000	2000
Air Heater #12	1.0	7.0 gal/hr	Distillate Fuel	2000	2000
Air Heater #13	1.0	7.0 gal/hr	Distillate Fuel	2000	2000
Air Heater #14	1.3	9.0 gal/hr	Distillate Fuel	2000	2000
Air Heater #15 **	1.3	9.0 gal/hr	Distillate Fuel	2025	2025
Air Heater #16 **	1.3	9.0 gal/hr	Distillate Fuel	2025	2025

* Removed from license
** New to license

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.

KRDP has applied to renew currently licensed emission units as well as amend their license as addressed in Section I(A) above.

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the "Significant Emissions" levels as defined in the Department's *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100. The emission increases are determined by subtracting the current licensed annual emissions preceding the modification from the maximum future licensed annual emissions, as follows:

Pollutant	Current License (tpy)	Future License (tpy)	Net Change (tpy)	Significant Emissions Levels
PM	4.6	7.7	+3.1	100
PM_{10}	4.6	7.7	+3.1	100
$PM_{2.5}$	(*not addressed*)	7.7	+7.7	100
SO_2	17.6	0.1	-17.5	100

Pollutant	Current License (tpy)	Future License (tpy)	Net Change (tpy)	Significant Emissions Levels
NO_x	10.0	14.6	+4.6	100
CO	4.3	5.5	+1.2	100
VOC	0.5	0.4	-0.1	100

Note: The large reduction in SO_2 is due to changes in distillate fuel sulfur content limits and other changes due to removal of distillate fuel use cap.

Therefore, this license is considered to be both a renewal and a minor modification and 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

The facility is licensed as follows:

- As a natural minor source of criteria pollutants, because no license restrictions are necessary to keep facility emissions below major source thresholds for criteria pollutants; 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 new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

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. Air Heaters #1, #2, #3, #4, #6, #7, #8, #10, #11, #12, #13, #14, #15, and #16

KRDP operates 14 air heating units, each with a heat input capacity less than 5 MMBtu/hr. Air Heaters #1 and #2 fire propane, and Air Heaters #3, #4, #6, #7, #8, #10, #11, #12, #13, #14, #15, and #16 fire distillate fuel. Air Heaters #15 and #16 are planned to be installed prior to the end of 2025. The other 12 air heating units were installed in 2000.

Air Heaters #3, #4, #6, #7, #8, #10, #11, #12, #13, #14, #15, and #16 are licensed to fire distillate fuel. 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 Air Heaters #3, #4, #6, #7, #8, #10, #11, #12, #13, #14, #15, and #16 shall not exceed 0.0015% by weight (15 ppm).

1. BPT Findings

The BPT emission limits for Air Heaters #1, #2, #3, #4, #6, #7, #8, #10, #11, #12, #13, and #14 were based on the following:

Distillate Fuel (Air Heaters #3, #4, #6, #7, #8, #10, #11, #12, #13, and #14)

$PM/PM_{10}/PM_{2.5}$	–	0.08 lb/MMBtu, 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

Propane (Air Heaters #1 and #2)

$PM/PM_{10}/PM_{2.5}$	–	0.05 lb/MMBtu, 06-096 C.M.R. ch. 115, BPT
SO_2	–	0.054 lb/1,000 gal based on AP-42 Table 1.5-1 dated 5/25 with a sulfur content of 0.54 gr/100 ft^3
NO_x	–	13 lb/1,000 gal based on AP-42 Table 1.5-1 dated 5/25
CO	–	7.5 lb/1,000 gal based on AP-42 Table 1.5-1 dated 5/25
VOC	–	1 lb/1,000 gal based on AP-42 Table 1.5-1 dated 5/25
Visible Emissions	–	06-096 C.M.R. ch. 101

Unit	Pollutant	lb/MMBtu
Air Heater #1	PM	0.05
Air Heater #2	PM	0.05

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)
Air Heater #1	0.21	0.21	0.21	-	0.58	0.34	0.04
Air Heater #2	0.21	0.21	0.21	-	0.58	0.34	0.04
Air Heater #3	0.18	0.18	0.18	-	0.31	0.08	0.01
Air Heater #4	0.10	0.10	0.10	-	0.19	0.05	-
Air Heater #6	0.10	0.10	0.10	-	0.19	0.05	-
Air Heater #7	0.10	0.10	0.10	-	0.19	0.05	-
Air Heater #8	0.10	0.10	0.10	-	0.19	0.05	-
Air Heater #10	0.08	0.08	0.08	-	0.14	0.04	-
Air Heater #11	0.08	0.08	0.08	-	0.14	0.04	-
Air Heater #12	0.08	0.08	0.08	-	0.14	0.04	-
Air Heater #13	0.08	0.08	0.08	-	0.14	0.04	-
Air Heater #14	0.10	0.10	0.10	-	0.19	0.05	-

2. BACT Findings

Following is a BACT analysis for control of emissions from Air Heaters #15 and #16.

a. Particulate Matter (PM, PM_{10}, $PM_{2.5}$)
KRDP has proposed to burn only distillate fuel, which inherently has a low-ash content, in the air heaters. Additional add-on pollution controls are not economically feasible.

BACT for PM/PM_{10}/$PM_{2.5}$ emissions from Air Heaters #15 and #16 is the emission limits listed in the tables below.

b. Sulfur Dioxide (SO_2)
KRDP has proposed to fire 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.

BACT for SO_2 emissions from Air Heaters #15 and #16 is the use of ultra-low-sulfur distillate fuel and the emission limits listed in the tables below.

c. Nitrogen Oxides (NO_x)
KRDP considered several control strategies for the control of NO_x including Selective Catalytic Reduction (SCR), Selective Non-Catalytic Reduction (SNCR), water/steam injection, flue gas recirculation (FGR), and use of oxygen trim systems. These types of controls are not available for air heater units of this size.

BACT for NO_x emissions from Air Heaters #15 and #16 is the use of the emission limits listed in the tables below.

d. Carbon Monoxide (CO) and Volatile Organic Compounds (VOC)
KRDP considered several control strategies for the control of CO and VOC including oxidation catalysts and thermal oxidizers. Oxidation catalysts and thermal oxidizers both have high capital, maintenance, and operational costs considering the size of the air heater units in question. These controls were determined to be economically infeasible.

BACT for CO and VOC emissions from Air Heaters #15 and #16 is the emission limits listed in the tables below.

e. Emission Limits
The BACT emission limits for Air Heaters #15 and #16 were based on the following:

Distillate Fuel

$PM/PM_{10}/PM_{2.5}$	–	0.08 lb/MMBtu, 06-096 C.M.R. ch. 115, BACT
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

The BACT emission limits for Air Heaters #15 and #16 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)
Air Heater #15	0.10	0.10	0.10	-	0.19	0.05	-
Air Heater #16	0.10	0.10	0.10	-	0.19	0.05	-

3. Visible Emissions

Visible emissions from Air Heaters #3, #4, #6, #7, #8, #10, #11, #12, #13, #14, #15, and #16 shall not exceed 20% opacity on a six-minute block average basis.

Visible emissions from Air Heaters #1 and #2 shall not exceed 10% opacity on a six-minute block average basis.

4. Periodic Monitoring

Periodic monitoring for Air Heaters #3, #4, #6, #7, #8, #10, #11, #12, #13, #14, #15, and #16 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.

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

   Due to their sizes and the fact that none of the air heaters are steam generating units, none of KRDP's air heaters are 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]

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

   KRDP's air heaters are not boilers as defined in this subpart and therefore 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. [40 C.F.R. § 63.11237]

C. General Process Emissions

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

D. Fugitive Emissions

KRDP 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.

KRDP 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.

E. 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 operating the Air Heaters each for 8,760 hr/yr.

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
Air Heater #1	0.9	0.9	0.9	-	2.6	1.5	0.2
Air Heater #2	0.9	0.9	0.9	-	2.6	1.5	0.2
Air Heater #3	0.8	0.8	0.8	-	1.4	0.3	-
Air Heater #4	0.5	0.5	0.5	-	0.8	0.2	-
Air Heater #6	0.5	0.5	0.5	-	0.8	0.2	-
Air Heater #7	0.5	0.5	0.5	-	0.8	0.2	-
Air Heater #8	0.5	0.5	0.5	-	0.8	0.2	-
Air Heater #10	0.4	0.4	0.4	-	0.6	0.2	-
Air Heater #11	0.4	0.4	0.4	-	0.6	0.2	-
Air Heater #12	0.4	0.4	0.4	-	0.6	0.2	-
Air Heater #13	0.4	0.4	0.4	-	0.6	0.2	-
Air Heater #14	0.5	0.5	0.5	-	0.8	0.2	-
Air Heater #15	0.5	0.5	0.5	-	0.8	0.2	-
Air Heater #16	0.5	0.5	0.5	-	0.8	0.2	-
Total TPY	**7.7**	**7.7**	**7.7**	**0.1***	**14.6**	**5.5**	**0.4**

* Because estimated emissions are small but not zero, this value was rounded to the nearest tenth of a ton.

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 the expected construction and operation of the proposed and 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 KRDP 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-800-71-F-R/A 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 KRDP is due by the end of August 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). [06-096 C.M.R. ch. 115]

SPECIFIC CONDITIONS

(17) **Air Heaters #1, #2, #3, #4, #6, #7, #8, #10, #11, #12, #13, #14, #15, and #16**

A. Fuel

1. Air Heaters #1 and #2 are licensed to fire propane. [06-096 C.M.R. ch. 115. BPT]
2. Air Heaters #3, #4, #6, #7, #8, #10, #11, #12, #13, #14, #15, and #16 are licensed to fire distillate fuel. [06-096 C.M.R. ch. 115. BPT/BACT]
3. The facility shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [06-096 C.M.R. ch. 115, BPT/BACT]
4. Compliance shall be demonstrated by fuel records showing the quantity, type, and percent sulfur of the fuel delivered. Records of annual fuel use shall be kept on a monthly and calendar year basis. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier, a statement from the supplier that the fuel delivered meets Maine's fuel sulfur content standards, certificate of analysis, or testing of fuel in the tank on-site. [06-096 C.M.R. ch. 115, BPT/BACT]

B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Air Heater #1	PM	0.05	06-096 C.M.R. ch. 115, BPT
Air Heater #2	PM	0.05	06-096 C.M.R. ch. 115, BPT

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

Emission 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)
Air Heater #1	0.21	0.21	0.21	-	0.58	0.34	0.04
Air Heater #2	0.21	0.21	0.21	-	0.58	0.34	0.04
Air Heater #3	0.18	0.18	0.18	-	0.31	0.08	0.01
Air Heater #4	0.10	0.10	0.10	-	0.19	0.05	-
Air Heater #6	0.10	0.10	0.10	-	0.19	0.05	-
Air Heater #7	0.10	0.10	0.10	-	0.19	0.05	-
Air Heater #8	0.10	0.10	0.10	-	0.19	0.05	-
Air Heater #10	0.08	0.08	0.08	-	0.14	0.04	-
Air Heater #11	0.08	0.08	0.08	-	0.14	0.04	-
Air Heater #12	0.08	0.08	0.08	-	0.14	0.04	-
Air Heater #13	0.08	0.08	0.08	-	0.14	0.04	-
Air Heater #14	0.10	0.10	0.10	-	0.19	0.05	-
Air Heater #15	0.10	0.10	0.10	-	0.19	0.05	-
Air Heater #16	0.10	0.10	0.10	-	0.19	0.05	-

D. Visible emissions from Air Heaters #3, #4, #6, #7, #8, #10, #11, #12, #13, #14, #15, and #16 each shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(2)]

E. Visible emissions from Air Heaters #1 and #2 each shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(3)]

(18) **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)]

(19) **Fugitive Emissions**

A. KRDP 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. KRDP 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)]

(20) 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, KRDP may be required to submit additional information. Upon written request from the Department, KRDP 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 5th DAY OF NOVEMBER, 2025.

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: September 19, 2025
Date of application acceptance: September 22, 2025

This Order prepared by Zac Hicks, Bureau of Air Quality.