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

DEPARTMENT ORDER

MSAD #17 **Oxford Hills School District** **Oxford County** **South Paris, Maine** **A-1015-71-E-N/A**	**Departmental** **Findings of Fact and Order** **Air Emission License** **After-the-Fact** **Renewal/Amendment**

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 MSAD #17 – Oxford Hills School District (Oxford Hills) expired on May 11, 2025. Oxford Hills has applied to renew their air emission license for the operation of emission sources associated with their educational facility. Oxford Hills has requested an after-the-fact amendment to their license to add two storage tanks, a parts washer, and an operational hour limit for their generator to 500 hours/year.

The equipment addressed in this license is located at 256 Main Street, South Paris, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers/Heaters

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Boiler #1	4.3	31.5 gal/hr	Distillate Fuel	1996	1996	1
Boiler #2	3.4	24.5 gal/hr	Distillate Fuel	1996	1996	2
Boiler #3	3.7	750 lb/hr	Biomass	2010	2011	3
Paint Booth Heater	1.0	11.1 gal/hr	Propane	Prior to 1998	Prior to 1998	N/A

Stationary Engine

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (kW)	Fuel Type	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.
Generator #1	7.8	800	Distillate Fuel	57.2	2006	2007

Liquid Organic Storage Tanks

Tank	Tank Type	Capacity (Gallons)	Material Stored	Year Constructed
Tank #1*	above ground, double walled, fixed	10,000	Distillate Fuel	Prior to 1998
Tank #2*	above ground, double walled, fixed	10,000	Distillate Fuel	Prior to 1998

* Tanks #1 and #2 are considered insignificant activities pursuant to *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115, Appendix B, § B(7) and are listed for completeness only.

Oxford Hills operates two paint booths, the larger DeVilbiss Pressurized Cure Booth 200 and a smaller DeVilbiss Pro Clean Booth.

Oxford Hills operates an aqueous-based parts washer. The cleaning solution contains less than 5% VOC, it does not meet the definition of solvent cleaning machine, and there are no applicable requirements in *Solvent Cleaners,* 06-096 C.M.R. ch. 130. Therefore, it is considered an insignificant activity and mentioned for completeness purposes only.

C. Definitions

Biomass means any biomass-based solid fuel that is not a solid waste. This includes, but is not limited to, wood residue and wood products (*e.g.,* trees, tree stumps, tree limbs, bark, lumber, sawdust, sander dust, chips, scraps, slabs, millings, and shavings). This definition also includes wood chips and processed pellets made from wood or other forest residues. Inclusion in this definition does not constitute a determination that the material is not considered a solid waste. Oxford Hills should consult with the Department before adding any new biomass type to its fuel mix.

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 Oxford Hills expired on May 11, 2025. A complete application was not submitted prior to the expiration date; therefore, Oxford Hills is considered to be an existing source applying for both an after-the-fact renewal and minor modification. The Department has determined the facility is a minor source, and the application has been processed through 06-096 C.M.R. ch. 115.

E. Facility Classification

With the annual operating hours restriction on Generator #1 and the 250 gallons/year cap of paint used in the paint booths, the facility is licensed as follows:

· As a synthetic minor source of air emissions for criteria pollutants, because Oxford Hills is subject to license restrictions that keep facility emissions below major source thresholds for NO_x and VOC; 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.

B. Boilers #1 and #2

Oxford Hills operates Boilers #1 and #2 for facility heating. The boilers are rated at 4.3 MMBtu/hr and 3.4 MMBtu/hr, respectively, and fire distillate fuel. The boilers were installed in 1996, and they exhaust through their own stacks, Stacks #1 and #2.

Boilers #1 and #2 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 Boilers #1 and #2 shall not exceed 0.0015% by weight (15 ppm).

1. BPT Findings

The following is an analysis similar to a BACT analysis for control of emissions from Boilers #1 and #2.

a. Particulate Matter (PM, PM_{10}, $PM_{2.5}$)
Oxford Hills burns only low-ash content fuel (distillate fuel) in Boilers #1 and #2. Additional add-on pollution controls are not economically feasible.

BPT for $PM/PM_{10}/PM_{2.5}$ emissions from Boilers #1 and #2 are the emission limits listed in the tables below.

b. Sulfur Dioxide (SO_2)
Oxford Hills 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 Boilers #1 and #2 is the use of ultra-low-sulfur distillate fuel and the emission limits listed in the tables below.

c. Nitrogen Oxides (NO_x)
There are several possible control strategies for the control of NO_x including Selective Catalytic Reduction (SCR), Selective Non-Catalytic Reduction (SNCR), water/steam injection, FGR, low-NO_x burners, and use of oxygen trim systems.

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, into the boiler combustion gases, 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 Boilers #1 and #2.

Water/steam injection and FGR can attain similar NO_x reduction efficiencies through lowering burner flame temperature and thereby reducing thermal NO_x

formation. However, both control strategies reduce the boiler's fuel efficiency, approximately 5% from water/steam injection but a lesser percentage from FGR.

The use of FGR on Boilers #1 and #2 as well as low-NO_x burners and an oxygen trim system has been determined to be feasible and has been selected as part of the BPT strategy.

BPT for NO_x emissions from Boilers #1 and #2 is the use of FGR, low-NO_x burners, an oxygen trim system, and the emission limits listed in the tables below.

d. Carbon Monoxide (CO) and Volatile Organic Compounds (VOC)
There are several control strategies for the control of CO and VOC including oxidation catalysts, thermal oxidizers, and use of an oxygen trim system.

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

The use of an oxygen trim system has been determined to be feasible and has been identified as part of the BPT strategy for Boilers #1 and #2.

BPT for CO and VOC emissions from Boilers #1 and #2 is the use of an oxygen trim system and the emission limits listed in the tables below.

e. Emission Limits
The BPT emission limits for Boilers #1 and #2 were based on the following:

$PM/PM_{10}/PM_{2.5}$	–	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, § 4(A)(2)

The BPT emission limits for Boilers #1 and #2 are the following:

Unit	Pollutant	lb/MMBtu
Boiler #1	PM	0.08
Boiler #2	PM	0.08

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)
Boiler #1	0.34	0.34	0.34	0.01	0.61	0.15	0.01
Boiler #2	0.27	0.27	0.27	0.01	0.49	0.12	0.01

2. Visible Emissions

   Visible emissions from Boilers #1 and #2 each shall not exceed 20% opacity on a six-minute block average basis.

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

   Due to their sizes, 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. [40 C.F.R. § 60.40c]

C. Boiler #3

Oxford Hills operates Boiler #3 for heating the facility and hot water. The boiler is rated at 3.7 MMBtu/hr and fires biomass with an average moisture content of 45%. This boiler is equipped with an oxygen trim system and uses a multi cyclone to control emissions. The boiler was installed in 2011 and exhausts through its own stack, Stack #3.

1. BPT Findings

   The following is an analysis similar to a BACT analysis for control of emissions from Boiler #3.

   a. Particulate Matter (PM, PM_{10}, $PM_{2.5}$)
   Oxford Hills burns wood with approximately 45% moisture content in Boiler #3 and optimizes combustion conditions using an oxygen trim system. An oxygen (O_2) trim system monitors the O_2 content in the exhaust gas and automatically adjusts the secondary air injection to optimize the air-to-fuel ratio. The effluent air then passes through a multi cyclone to control PM.

   Potential PM controls for biomass boilers consist of add-on controls, combustion of clean fuel, good combustion practices, or a combination of options. Potential add-on controls for biomass boilers include fabric filters, electrostatic precipitators, wet scrubbers, and multiclones.

   Baghouses and fabric filters are not technically feasible due to a high risk of fires which can destroy the bags due to smoldering particulates that may be carried over from the firebox.

Electrostatic precipitators (ESPs) are technically feasible, but there are significant initial and ongoing costs associated with them. Initial costs include construction of the ESP system and electrical components, support foundations, and a larger, more powerful induced draft (ID) fan to overcome the increased pressure drop of the ESP. Ongoing costs include electrical usage for the transformer/rectifier (T/R) system to power the electrical fields, electrical heaters to prevent condensation and corrosion in the internal components, and increased power requirements for the ID fan. Due to the relatively small size of the boiler, the additional costs associated with and ESP are considered economically infeasible.

A wet scrubber or wet ESP is not feasible based on significant environmental impacts due to water management, along with not being justifiable for economic and energy considerations.

BPT for $PM/PM_{10}/PM_{2.5}$ emissions from Boiler #3 is the use of an oxygen trim system and multi cyclone and the emission limits listed in the tables below.

b. Sulfur Dioxide (SO_2)

Oxford Hills fires only biomass in Boiler #3. 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 Boiler #3 is the use of an oxygen trim system and the emission limits listed in the tables below.

c. Nitrogen Oxides (NO_x), Carbon Monoxide (CO), and Volatile Organic Compounds (VOC)

Emissions of NO_x, CO, and VOC from Boiler #3 are minimized by a combination of boiler design including O_2 trim to optimize its efficiency along with good combustion and maintenance practices consistent with boilers of similar size and design.

Other possible control strategies include Selective Catalytic Reduction (SCR), Selective Non-Catalytic Reduction (SNCR), water/steam injection, flue gas recirculation (FGR) to reduce NO_x emissions, and oxidation catalysts and thermal oxidizers to reduce CO and VOC emissions. Add-on controls are not technically or economically feasible for expected emissions from Boiler #3.

The Department finds that BPT for NOx, CO, and VOC emissions from Boiler #3 is the use of an oxygen trim system, good combustion and maintenance practices, and the emission limits listed in the tables below.

d. Emission Limits

The BPT emission limits for Boiler #3 were based on the following:

$PM/PM_{10}/PM_{2.5}$	–	0.30 lb/MMBtu, 06-096 C.M.R. ch. 103, § 2(B)(4)(a)
SO_2	–	0.025 lb/MMBtu based on AP-42 Table 1.6-2 dated 4/22
NO_x	–	0.22 lb/MMBtu based on AP-42 Table 1.6-2 dated 4/22
CO	–	0.60 lb/MMBtu based on AP-42 Table 1.6-2 dated 4/22
VOC	–	0.017 lb/MMBtu based on AP-42 Table 1.6-2 dated 4/22
Visible Emissions	–	06-096 C.M.R. ch. 101, § 4(A)(5)

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

Unit	Pollutant	lb/MMBtu
Boiler #3	PM	0.30

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)
Boiler #3	1.11	1.11	1.11	0.09	0.81	2.22	0.06

2. Visible Emissions

Visible emissions from Boiler #3 shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time Oxford Hills shall either meet the normal operating visible emissions standard or the following alternative visible emissions standard.

During periods of startup, shutdown, or malfunction, visible emissions shall not exceed 40% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive six-minute block averages) per event. If this alternative visible emissions standard is utilized, Oxford Hills shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.

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

Due to its size, Boiler #3 is 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]

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

Boilers #1, #2, and #3 are 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. Boilers #1 and #2 are considered existing oil fired boilers rated less than 10 MMBtu/hr. Boiler #3 is considered an existing biomass boiler rated less than 10 MMBtu/hr. [40 C.F.R. §§ 63.11193 and 63.11195]

Applicable federal 40 C.F.R. Part 63, Subpart JJJJJJ requirements include the following. Additional rule information can be found on the following website: https://www.epa.gov/stationary-sources-air-pollution/compliance-industrial-commercial-and-institutional-area-source.

a. Work Practice Requirements

(1) Boiler Tune-Up Program

(i) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]

(ii) Tune-ups shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

Boiler Category	**Tune-Up Frequency**
Oil fired boilers with a heat input capacity of ≤ 5MMBtu/hr (Boilers #1 and #2)	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up (Boiler #3)	Every 5 years

[40 C.F.R. § 63.11223(a) and Table 2]

(iii) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hour or boilers with oxygen trim systems. [40 C.F.R. § 63.11223(b)(1)]

2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]
3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hour or boilers with oxygen trim systems. [40 C.F.R. § 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]
6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 C.F.R. § 63.11223(b)(7)]

(iv) Tune-Up Report: A tune-up report shall be maintained onsite and submitted to the Department and/or EPA upon request. The report shall contain the following information:

1. The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up and

2. A description of any corrective actions taken as part of the tune-up of the boiler.

[40 C.F.R. § 63.11223(b)(6)]

(2) Compliance Report

For every five-year compliance period, Oxford Hills shall prepare a compliance report by March 1st of the following year to document the information below for the five-year period. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

(i) Company name and address;

(ii) A statement of whether the source has complied with all the relevant requirements of this Subpart;

(iii) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;

(iv) The following certifications, as applicable:

1. "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
2. "No secondary materials that are solid waste were combusted in any affected unit."
3. "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

b. Recordkeeping

(1) Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJJ including the following [40 C.F.R. § 63.11225(c)]:

(i) Copies of notifications and reports with supporting compliance documentation;

(ii) Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;

(iii) Records of the occurrence and duration of each malfunction of each applicable boiler; and

(iv) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

(2) Records shall be in a form suitable and readily available for expeditious review. Each record must be kept for 5 years following the date of each recorded action. Each record must be kept on-site or be accessible from a central location by computer or other means that instantly provides access at the site for at least 2 years after the date of each recorded action. The records may be maintained off-site for the remaining 3 years. [40 C.F.R. § 63.11225(d)] Note: Standard Condition (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ shall be streamlined to the more stringent six-year requirement.

E. Paint Booth Heater

In the larger paint booth (the Debilbiss Pressurized Cure Booth 200), Oxford Hills operates the Paint Booth Heater, with a heat input capacity of 1.0 MMBtu/hr firing propane.

1. BPT Findings

   The BPT emission limits for the Paint Booth Heater were based on the following:

$PM/PM_{10}/PM_{2.5}$	–	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 7/08
NO_x	–	13 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
CO	–	7.5 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
VOC	–	1 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
Visible Emissions	–	06-096 C.M.R. ch. 101, § 4(A)(3)

   The BPT emission limits for the Paint Booth Heater 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)
Paint Booth Heater	0.05	0.05	0.05	-	0.14	0.08	0.01

2. Visible Emissions

   Visible emissions from the Paint Booth Heater shall not exceed 10% opacity on a six-minute block average basis.

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

   Due to the size of the unit, the Paint Booth Heater is 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]

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

   The Paint Booth Heater does not heat water or any other heat transfer liquid. It does not meet the definition of a "boiler" and therefore is 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.

F. Generator #1

Oxford Hills operates one non-emergency generator, Generator #1. The generator is a generator set consisting of an engine and an electrical generator. Generator #1 has an engine rated at 1,214 brake horsepower (bhp), approximately equal to 7.8 MMBtu/hr. It

fires distillate fuel with a sulfur content of 0.0015% by weight or less and was manufactured after April 1, 2006, and installed in 2007.

1. BPT Findings

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

$PM/PM_{10}/PM_{2.5}$	–	0.12 lb/MMBtu, 06-096 C.M.R. ch. 103, § 2(B)(1)(a)
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 based on AP-42 Table 3.4-1 dated 4/25
CO	–	0.85 lb/MMBtu based on AP-42 Table 3.4-1 dated 4/25
VOC	–	0.09 lb/MMBtu based on AP-42 Table 3.4-1 dated 4/25
Visible Emissions	–	06-096 C.M.R. ch. 101, § 4(A)(4)

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

Unit	Pollutant	lb/MMBtu
Generator #1	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)
Generator #1	0.94	0.94	0.94	0.01	24.96	6.63	0.70

Generator #1 shall be limited to 500 hours of operation per calendar year of total use. Generator #1 shall be equipped with a non-resettable hour-meter to record operating time. To demonstrate compliance with the operating hours limit, Oxford Hills shall keep records of the total hours of operation.

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

2. Chapter 169

Generator #1 was installed prior to the effective date of *Stationary Generators*, 06-096 C.M.R. ch. 169 and is therefore exempt from this rule pursuant to section 1.

3. New Source Performance Standards

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

[40 C.F.R. § 60.4200] By meeting the requirements of 40 C.F.R. Part 60, Subpart IIII, the unit also meets the requirements found in the *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 C.F.R. Part 63, Subpart ZZZZ. [40 C.F.R. § 63.6590(c)]

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

(1) Manufacturer Certification Requirement
Owners and operators of pre-2007 model year non-emergency engines must demonstrate compliance with the emission standards in § 60.4204(a) through one of the methods listed in § 60.4211(b). One available method is purchasing an engine certified according to 40 C.F.R. Part 1039 for the same model year and maximum engine power. Generator #1's engine is a model year 2006 Caterpillar model C27. The engine belongs to engine family 6CPXL27.0ESL which has a certificate of conformity (Certificate Number CPX-NR0-06-04) for model year 2006.

(2) Ultra-Low Sulfur Fuel Requirement
The fuel fired in Generator #1 shall not exceed 15 ppm sulfur (0.0015% sulfur). [40 C.F.R. § 60.4207(b)]

(3) Operation and Maintenance Requirements
Generator #1 shall be operated and maintained according to the manufacturer's emission-related written instructions. Oxford Hills may only change those emission-related settings that are permitted by the manufacturer. [40 C.F.R. § 60.4211(a)]

Oxford Hills 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]

G. Paint Booths

Oxford Hills operates two paint booths, the larger DeVilbiss Pressurized Cure Booth 200 and a smaller DeVilbiss Pro Clean Booth.

The paint booths are equipped with filters to control emissions of particulate matter (PM). Emissions of PM from the paint booths are considered unquantifiable. However, Oxford Hills shall maintain the filters so as to minimize PM emissions such that visible emissions from the paint booths do not exceed 10% opacity on a six-minute block average basis.

Oxford Hills shall not exceed the use of 250 gallons of paint in the paint booths (combined) on a calendar year basis. This restriction limits emissions from the paint booths to less than

1.0 tpy of VOC. Compliance shall be demonstrated by a log (written or electronic) of the amount of paint (gallons) used in the paint booths.

BPT for the paint booths is determined to be the use of filters to limit emissions of PM, a combined throughput limit of 250 gallons/year of paint, and a visible emissions limit of 10% on a six-minute block average basis.

H. General Process Emissions

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

I. Fugitive Emissions

Oxford Hills 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.

Oxford Hills 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.

J. 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:

- Operating Generator #1 for 500 hrs/yr;
- Operating the boilers and Paint Booth Heater for 8,760 hr/yr each; and
- Use of 250 gallons/year of paint in the paint booths.

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
Boiler #1	1.5	1.5	1.5	-	2.7	0.7	0.1
Boiler #2	1.2	1.2	1.2	-	2.1	0.5	-
Boiler #3	4.9	4.9	4.9	0.4	3.6	9.7	0.3
Paint Booth Heater	0.2	0.2	0.2	-	0.6	0.4	0.1
Generator #1	0.2	0.2	0.2	-	6.2	1.7	0.2
Paint Booths	-	-	-	-	-	-	1.0
Total TPY	**8.0**	**8.0**	**8.0**	**0.4**	**15.2**	**13.0**	**1.7**

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 Oxford Hills 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-1015-71-E-N/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 Oxford Hills 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) **Boilers #1 and #2**

A. Oxford Hills shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). 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]

B. Oxford Hills shall operate and maintain their FGR, low-NO_x burners, and O_2 trim system, for Boilers #1 and #2, according to the manufacturer's written instructions. [06-096 C.M.R. ch. 115, BPT]

C. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.08	06-096 C.M.R. ch. 115, BPT
Boiler #2	PM	0.08	

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

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)
Boiler #1	0.34	0.34	0.34	0.01	0.61	0.15	0.01
Boiler #2	0.27	0.27	0.27	0.01	0.49	0.12	0.01

E. Visible emissions from Boilers #1 and 2 each shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(2)]

(18) **Boiler #3**

A. Oxford Hills shall operate and maintain their O_2 trim system and multi cyclone, for Boiler #3, according to the manufacturer's written instructions. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	PM	0.30	06-096 C.M.R. ch. 103, § 2(B)(4)(a)

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

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)
Boiler #3	1.11	1.11	1.11	0.09	0.81	2.22	0.06

D. Visible Emissions

Visible emissions from Boiler #3 shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time Oxford Hills shall either meet the normal operating visible emissions standard or the following alternative visible emissions standard.

During periods of startup, shutdown, or malfunction, visible emissions shall not exceed 40% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive six-minute block averages) per event. If this alternative visible emissions standard is utilized, Oxford Hills shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.
[06-096 C.M.R. ch. 101, § 4(A)(5)(a)]

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

Oxford Hills shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJJ applicable to Boilers #1, #2, and #3 including, but not limited to, the following: [incorporated under 06-096 C.M.R. ch. 115, BPT]

A. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]

1. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

Boiler Category	Tune-Up Frequency
Oil fired boilers with a heat input capacity of ≤5MMBtu/hr (Boilers #1 and #2)	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up (Boiler #3)	Every 5 years

[40 C.F.R. § 63.11223(a) and Table 2]

2. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
   a. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hour or boilers with oxygen trim systems. [40 C.F.R. § 63.11223(b)(1)]
   b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F..R § 63.11223(b)(2)]
   c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hour or boilers with oxygen trim systems. [40 C.F.R. § 63.11223(b)(3)]
   d. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
   e. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]
   f. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 C.F.R. § 63.11223(b)(7)]

3. Tune-Up Report: A tune-up report shall be maintained onsite and submitted to the Department and EPA upon request. The report shall contain the following information:
   a. The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up and
   b. A description of any corrective actions taken as part of the tune-up of the boiler.
   [40 C.F.R. § 63.11223(b)(6)]

B. Compliance Report

For every five-year compliance period, Oxford Hills shall prepare a compliance report by March 1st of the following year to document the information below for the five-year period. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

1. Company name and address;
2. A statement of whether the source has complied with all the relevant requirements of this Subpart;
3. A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
4. The following certifications, as applicable:
   a. "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
   b. "No secondary materials that are solid waste were combusted in any affected unit."
   c. "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

C. Recordkeeping

1. Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJJ including the following [40 C.F.R. § 63.11225(c)]:

   a. Copies of notifications and reports with supporting compliance documentation;
   b. Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
   c. Records of the occurrence and duration of each malfunction of each applicable boiler; and
   d. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

2. Records shall be in a form suitable and readily available for expeditious review. Each record must be kept for 5 years following the date of each recorded action. Each record must be kept on-site or be accessible from a central location by computer or other means that instantly provides access at the site for at least 2 years after the date of each recorded action. The records may be maintained off-site for the remaining 3 years. [40 C.F.R. § 63.11225(d)] Note: Standard Condition (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ shall be streamlined to the more stringent six-year requirement.

(20) **Paint Booth Heater**

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

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)
Paint Booth Heater	0.05	0.05	0.05	-	0.14	0.08	0.01

B. Visible emissions from the Paint Booth Heater shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(3)]

(21) **Generator #1**

A. Generator #1 shall be limited to 500 hours of operation per calendar year. [06-096 C.M.R. ch. 115, BPT]

B. Oxford Hills shall keep records that include the hours of operation of the engine recorded through a non-resettable hour meter. [06-096 C.M.R. ch. 115, BPT]

C. Oxford Hills shall keep records of all maintenance conducted on the engine associated with Generator #1. [06-096 C.M.R. ch. 115, BPT]

D. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
Generator #1	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)
Generator #1	0.94	0.94	0.94	0.01	24.96	6.63	0.70

F. Visible Emissions

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

G. Generator #1 shall meet the applicable requirements of 40 C.F.R. Part 60, Subpart IIII for non-emergency generators, including, but not limited to, the following: [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. Manufacturer Certification
   The engine shall be certified according to 40 C.F.R. Part 1039 for the same model year and maximum engine power. [40 C.F.R. § 60.4211(b)(1)]

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

   Oxford Hills 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]

(22) **Paint Booths**

A. Oxford Hills shall install and maintain filters for control of PM from the paint booths. [06-096 C.M.R. ch. 115, BPT]

B. Visible emissions from the paint booths shall each not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

C. Oxford Hills shall not exceed a paint usage of 250 gallons per calendar year in both paint booths combined. Compliance shall be demonstrated by a log (written or electronic) of the amount of paint (gallons) used in the paint booths. [06-096 C.M.R. ch. 115, BPT]

(23) **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)]

(24) **Fugitive Emissions**

A. Oxford Hills 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. Oxford Hills 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)]

(25) If the Department determines that any parameter value pertaining to construction and operation of the emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, Oxford Hills may be required to submit additional information. Upon written request from the Department, Oxford Hills 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 23rd DAY OF JUNE, 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: May 19, 2025
Date of application acceptance: May 20, 2025

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