



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

DEPARTMENT ORDER

**Katahdin Railcar Services LLC
Piscataquis County
Milo, Maine
A-1131-71-L-M**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #10**

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

Central Maine & Quebec Railway US Inc. (CMQR) was issued Air Emission License A-1131-71-A-N on May 17, 2018, for the operation of emission sources associated with their railcar maintenance facility. The license was subsequently amended as follows:

Amendment #	Date Issued	Brief Description
A-1131-71-B-A	11/4/2019	Revise BACT for railcar cleaning operation and replace Boiler #1
A-1131-71-C-T	9/2/2020	Transfer of license to Katahdin Railcar Services LLC (KRS)
A-1131-71-D-M	10/14/2020	Adding cars that carried molten sulfur
A-1131-71-E-M	6/16/2021	Adding cars that carried ethyl acetate
A-1131-71-F-M	1/18/2023	Adding cars that carried aluminum hydroxide
A-1131-71-G-M	7/27/2023	Adding cars that carried petroleum distillates, olefins, and aromatic hydrocarbons
A-1131-71-H-M	11/14/2023	Address applicable requirements of Chapter 170 and clarify requirements for cars that carried aviation gasoline, crude oil, and polyethylene copolymer
A-1131-71-I-M	8/19/2024	Adding cars that carried cumene
A-1131-71-J-M	11/19/2024	Adding several commodities to List 2
A-113171-K-M	1/10/2025	Addition of polyisobutylene to List 1

The Air Emission License was transferred to Katahdin Railcar Services (KRS) with A-1131-71-C-T issued September 2, 2020. KRS has requested a minor revision to their license in order to add methylcyclohexane to the license Appendix List 2 (Flammable Liquids and Gases).

The equipment addressed in this license amendment is located at 18 B&A Avenue, Milo, Maine.

B. Revision Description

KRS performs maintenance work and cleaning operations on railcars. As part of this work, KRS needs to open the railcar's vapor space and sometimes degas or purge railcars. All railcars that are opened, degassed, or purged at the facility must be included in either List 1 (Commodities Subject to Work Practice Standards Only) or List 2 (Flammable Liquids and Gases) contained in the license appendix.

KRS has requested that the following chemical be added to the Appendix List 2 (Flammable Liquids and Gases).

Commodity	Common Name or Type of Product	CAS No.	VOC	HAP
Methylcyclohexane	Hydrocarbons	108-87-2	Yes	No

Best available control technology (BACT) for opening and cleaning of railcars containing List 2 commodities was established in Air Emission License A-1131-71-B-A (11/4/2019) and clarified in Air Emission Licenses A-1131-71-D-M (10/14/2020) and A-1131-71-H-M (11/14/2023). BACT was determined to be the use of an air-assisted, open, elevated flare (Flare #1) and compliance with the Car Cleaning Work Practice Standards.

The commodity above has similar properties to other List 2 commodities. It is not a material with a Reportable Quantity (RQ) less than or equal to 10 pounds pursuant to *Designation, Reportable Quantities, and Notification*, 40 C.F.R. Part 302.4 or *Emergency Planning and Notification*, 40 C.F.R. Part 355, Appendix A.

Therefore, the Department determines that the inclusion of methylcyclohexane in the license Appendix List 2 is appropriate and represents BACT for control of VOC and HAP emissions.

No increase in the annual VOC emission limit of 49.9 tpy has been requested. Emissions from the opening, purging, and cleaning of railcars previously carrying this commodity will be included when demonstrating compliance with the existing annual VOC and HAP emission limits.

C. Annual Emissions

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

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Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License Amendment A-1131-71-L-M subject to the conditions found in Air Emission License A-1131-71-A-N; in amendments A-1131-71-B-A, A-1131-71-D-M, A-1131-71-E-M, A-1131-71-F-M, A-1131-71-G-M, A-1131-71-H-M, A-1131-71-I-M, A-1131-71-J-M, and A-1131-71-K-M; and in transfer A-1131-71-C-T.

Severability. The invalidity or unenforceability of any provision of this License Amendment or part thereof shall not affect the remainder of the provision or any other provisions. This License Amendment shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

This license amendment will not add, delete, or change any existing license conditions.

This license amendment updates the license Appendix List 2 to include methylocyclohexane.

DONE AND DATED IN AUGUSTA, MAINE THIS 7th DAY OF MARCH, 2025.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, COMMISSIONER

The term of this license amendment shall be ten (10) years from the issuance of Air Emission License A-1131-71-A-N (issued 5/17/2018).

[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: 2/20/2025

Date of application acceptance: 2/21/2025

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

Appendix

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LIST 2 – FLAMMABLE LIQUIDS AND GASES

Page 1 of 2

STCC ¹ (If Known)	Commodity	Common Name or Type of Chemical Product	CAS No.	RQ (lbs)
2818414 2818417 2818445 2818446 4908170 4908179 4908180 4909117 4909152 4909159 4909363 4910240 4914105 2085120	Ethanol – Ethyl Alcohol Anhydrous Denatured – Alcohol Beverage Ethanol Gas Denatured Alcohol	Ethanol	64-17-5	None
2899415 4909230	Fatty Acid Esters of Vegetable Fish or Animal Methanol	 Methanol	 67-56-1	 5,000
2899416	Methyl Esters (Methyl Soyate) Diesel from Vegetable oil	Methyl Esters	Various	1,000
2911976	Petroleum Condensate	Natural Gas Condensate	Various	None
2991240	Motor Fuel NEC Liquid (Blends of Alcohol and Motor Fuel)	Gasoline, Aviation Gasoline	Various	None
4905419 4905421 4905423 4905424 4905752 4905784 4907603 4909105 4910236	 Liquefied Petroleum Gas	 Propane / Odorized Propane Butane Ethane	 74-98-6 106-97-8 74-84-0	 None
4906620	Propylene Oxide	Propylene Oxide	75-56-9	100
4907250	Methyl Methacrylate	Methyl Methacrylate	80-62-6	1,000
4907265	Styrene Monomer	Styrene Monomer	100-42-5	1,000
4912215	Butyl Acrylate	Butyl Acrylate	Various	None

Appendix

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LIST 2 – FLAMMABLE LIQUIDS AND GASES

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STCC ¹ (If Known)	Commodity	Common Name or Type of Chemical Product	CAS No.	RQ (lbs)
	Natural Gas	Natural Gas / Methane	74-82-8	None
	Isobutane	Isobutane	75-28-5	None
	P-P Mix	Propylene (75-80%)	115-07-1	None
		Propane (0-3%)	74-98-6	None
	Formaldehyde Solutions with vapor pressure ≥ 0.05 psi		50-00-0	100
1311110 1441314 4910164 4910165 4910187 4910191 4910599	Petroleum Oil Crude Oil or Shale Oil Crude	Crude Oil with a vapor pressure ≥ 0.5 psi	None	None
	Sand Industrial Oil or Gas Well Fracture			
	Petroleum Crude			
	Petroleum Sour			
4917403	Molten Sulfur	>10 ppm H ₂ S	7783-06-4	100
4909160	Ethyl Acetate	Ethyl Acetate	141-78-6	5,000
4909382 4914247 4914256 2911791	Hydrotreated Light Distillate Stoddard Solvent Mineral Oil Hydrocarbon Solvent	Petroleum Distillates	64742-47-8	None
4912285	Alkenes, C11-C13, C12 Rich	Olefins	68526-58-9	None
2814167	Toluene	Aromatic Hydrocarbons	108-88-3	1,000
1311110 1441314 4910164 4910165 4910187 4910191 4910599	Petroleum Oil Crude Oil or Shale Oil Crude	Crude Oil with a vapor pressure < 0.5 psi	None	None
	Sand Industrial Oil or Gas Well Fracture			
	Petroleum Crude			
	Petroleum Sour			
2815122	Cumene	Aromatic Hydrocarbon	98-82-8	5,000
2912122	Butene	Liquified Petroleum Gas	196-98-9	None
2815187	Dicyclopentadiene	Hydrocarbons	77-73-6	None
	Crude Isoprene	Hydrocarbons	68476-55-1	100
2911903	Octenes	Octenes	25377-83-7	1,000
	Pyrolysis Fuel Oil	PFO	69013-21-4	100
2912128	Propylene	Liquified Petroleum Gas	115-07-1	None
2818370	Cyclohexane	Hydrocarbons	110-82-7	1,000
4909330	Methylcyclohexane	Hydrocarbons	108-87-2	None

¹ Standard Transportation Commodity Code