



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-M-M**

**Departmental  
Findings of Fact and Order  
Air Emission License  
Amendment #11**

**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:

<b>Amendment #</b>	<b>Date Issued</b>	<b>Brief Description</b>
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-1131-71-K-M	1/10/2025	Addition of polyisobutylene to List 1
A-1131-71-L-M	3/7/2025	Addition of methylcyclohexane to List 2

As indicated in the table above, the license was transferred to Katahdin Railcar Services LLC (KRS) with license amendment A-1131-71-C-T on September 2, 2020.

KRS has requested a minor revision to their license in order to add water-based binding and dispersing agents to the license Appendix List 1 (Commodities Subject to Work Practice Standards Only).

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 chemicals be added to the Appendix List 1 (Commodities Subject to Work Practice Standards Only).

Commodity	Common Name or Type of Product	CAS No.	VOC	HAP
Borresperse NA 881L	Water (~54%) Sodium lignosulfonate (~46%)	8061-51-6	No	No
DUSTNOT BIO	Water (70-75%) Lignin (15-20%) Sugars (5-15%)	proprietary <sup>1</sup>	No	No

Both commodities listed above are water-based binding and dispersing agents. Each is more than 50% water and contain lignin salts and sugars in solution. They have low vapor pressures and any VOC emissions from the cleaning process would be insignificant. Neither commodity is considered a hazardous substance by either *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.

Best available control technology (BACT) for opening and cleaning of railcars containing List 1 commodities was established in Air Emission License A-1131-71-B-A (11/4/2019). BACT was determined to be compliance with the Car Cleaning Work Practice Standards (as specified in A-1131-71-B-A). Borresperse NA 881L and DUSTNOT BIO are compounds with similar properties to other List 1 commodities. Therefore, the Department determines that their inclusion in the license Appendix List 1 is appropriate and represents BACT.

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<sup>1</sup> The Safety Data Sheet for this commodity indicates that the non-water components are proprietary. However, they are listed as lignin and sugars, which are expected to be non-VOC and non-HAP containing compounds.

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 these commodities 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.

**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 Amendment A-1131-71-M-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, A-1131-71-K-M, and A-1131-71-L-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.**

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

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**Departmental  
Findings of Fact and Order  
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**This license amendment updates the license Appendix List 1 to include Borresperse NA 881L and DUSTNOT BIO.**

DONE AND DATED IN AUGUSTA, MAINE THIS 9<sup>th</sup> DAY OF JUNE, 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: 5/19/2025

Date of application acceptance: 5/19/2025

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

## Appendix

A-1131-71-M-M

LIST 1 – COMMODITIES SUBJECT TO WORK PRACTICE STANDARDS ONLY

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STCC <sup>1</sup> (If Known)	Commodity	Common Name or Type of Chemical Product	CAS No.	RQ (lbs)
4912269 4912336 4914146 4914170	Fuel Oil	#2 through #6 fuel oil and diesel fuel	various	None
2821245	Latex (liquid rubber) synthetic	Latex	None	None
2899834	Polyacrylamide-water solution	Polymer	None	None
2899885	Additives Fuel Oil Gasoline or Lubricating Oil	Fuel or lubricating oil additives	Various	None
3295230	Kaolin & Water Slurry	Kaolin	1332-58-7	None
	Kaolin		1318-74-7	
4918723	Sodium Chlorate	Sodium Chlorate (solid powder)	7775-09-9	None
4961605	Heated Asphalt	Asphalt Roofing Flux	8052-42-4	None
1441310	Industrial Sand Ungrounded and Unbonded	Sand	Various	None
1471510	Rock Salt	Rock Salt	14762-51-7	None
1491970	Perlite Rock	Perlite Rock (solid)	None	None
2046115	Corn Syrup (Glucose)	Corn Syrup	Various	None
2093342	Rapeseed Oil	Rapeseed Oil	None	None
2812355	Sodium Sulfate (Salt Cake)	Sodium Sulfate (solid)	Various	None
2812534	Potassium Chloride	Potassium Chloride	7447-40-7	None
2911990	Paraffin Wax or Petroleum Wax	Wax	Various	None
3241110	Cement Clinker	Cement (solid)	Various	None
3241115	Cement Hydraulic Portland			
3295956	Limestone Slurry Consisting of Ground Limestone	Lime	Various	None
4918311	Ammonium Nitrate	Ammonium Nitrate	6484-52-2	None
	Hydrochloric Acid	Hydrochloric Acid	7647-01-0	5,000
4930040	Sulfuric Acid	Sulfuric Acid	7664-93-9	1,000
4935240	Sodium Hydroxide (Caustic Soda)	Sodium Hydroxide (solid)	1310-73-2	1,000
	Axperse	Water-based processing aid for industrial operations, no hazardous substances, no flash point	None	None
	Crystalline Silica	Silica	None	None
	Diammonium Sulfate (Trinseo for RAP 740NA Latex)	Styrene-butadiene based polymer (45-55%)	Trade Secret	None
		Diammonium sulfate (<1.5%)	7783-20-2	None
		Water (45-55%)	7732-18-15	None

<sup>1</sup> Standard Transportation Commodity Code

## Appendix

A-1131-71-M-M

LIST 1 – COMMODITIES SUBJECT TO WORK PRACTICE STANDARDS ONLY

Page 2 of 2

STCC <sup>1</sup> (If Known)	Commodity	Common Name or Type of Chemical Product	CAS No.	RQ (lbs)
	Latex LXC 803F NA – Trinseo	Styrene-butadiene based polymer (45-55%) Water (45-55%)	Trade Secret 7732-18-15	None
	CP 615 NA Latex – Trinseo			
	XU 31719.00 Experimental Latex – Trinseo			
	XU 31032.50 Experimental Latex – Trinseo			
	Flosperser	Processing aid for industrial operations, no hazardous substances, water-based, no flash point	None	None
	Quartz	Quartz	14808-60-7	None
	Tetrasodium Salt	Acetic acid	64-02-8	None
	Amres 1110-E Wet Strength Resin (water-based, no flash point)		Various	None
	NovaCote 1936HS Surface Sizeing Agent (water-based, no flash point)		Various	None
	Precipitated Calcium Carbonate		471-34-1	None
	Digitall 9708.1 (paper coating solution)	Water (55-75%) Polymers (25-45%)	Trade Secret	None
	Taflonol UMS Series Liquid	Brightener (10-30%) Water (70-90%)	16470-24-9 7732-18-5	None
	Formaldehyde Solutions with vapor pressure <0.05 psi		50-00-0	100
	YaraVera Urea 46-0-0	Urea	57-13-6	None
	Molten Sulfur	≤10 ppm H <sub>2</sub> S	7783-06-4	100
1051311	Aluminum Hydroxide	Hydrated Alumina	21645-51-2	None
2821142	Polyethylene Copolymer (pellets)	1-Butene, polymer with ethene Ethylene, polymer with 1-butene Ethene-Butene copolymer	25087-34-7	None
2912123	Polyisobutylene	PIB	9003-27-4	None
	Borresperse NA 881L	Water (~54%) Sodium lignosulfonate (~46%)	8061-51-6	None
	DUSTNOT BIO	Water (70-75%) Lignin (15-20%) Sugars (5-15%)	proprietary	None