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

DEPARTMENT ORDER

TRANSFLO Terminal Services, Inc. **Cumberland County** **South Portland, Maine** **A-1190-71-A-N**	**Departmental** **Findings of Fact and Order** **Air Emission License**

FINDINGS OF FACT

After review of the air emission license 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

TRANSFLO Terminal Services, Inc. (TRANSFLO) has applied for an Air Emission License for the operation of emission sources associated with their rail loading and unloading facility.

The equipment addressed in this license is located at 20 Rigby Rd, South Portland, Maine.

B. Title, Right, or Interest

In their application, TRANSFLO submitted copies of a property lease demonstrating interest in the facility. TRANSFLO has provided sufficient evidence of title, right, or interest in the facility for purposes of this air emission license.

C. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.	Stack #
EUB1	8.4	8,235 scf/hr	Natural Gas	2024	2025	B1
		58.0 gal/hr	Distillate Fuel			
EUB2	8.4	8,235 scf/hr	Natural Gas	2024	2025	B2
		58.0 gal/hr	Distillate Fuel			

TRANSFLO also may have several small boilers, water heaters, and unit heaters not listed in the table above. These are considered insignificant emissions units because they are each

rated below 1.0 MMBtu/hr, the heat input capacity level at or above which would require their inclusion in the license; therefore, these small boilers, water heaters, and unit heaters are not addressed further in this license.

Process Equipment

Equipment	Production Rate *	Pollution Control Equipment
Liquid Transfer Operations	400 gallons/min	Vapor Balance
Solids Transfer Operations	50 tons/hr	Fabric Filters

* Production rate is listed on a per transfer unit basis

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.

A new source is considered a major source based on whether or not total licensed annual emissions exceed the "Significant Emissions" levels as defined in the Department's *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100.

Pollutant	Total Licensed Annual Emissions (tpy) **	Significant Emissions Levels
PM	3.7	100
PM_{10}	3.7	100
$PM_{2.5}$	3.7	100
SO_2	0.1	100
NO_x	7.3	100
CO	6.1	100
VOC	0.4	50*

* TRANSFLO is located in an area of the state included in the Ozone Transport Region. Therefore, the significant emission level for VOC is 50 tpy.

** As described following in this document, these licensed emissions are from the two boilers, with the process related emissions being considered unquantifiable.

The Department has determined the facility is a minor source, and the application has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 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.

B. Boilers

TRANSFLO operates Boilers EUB1 and 2 to heat materials for easier unloading. The boilers are rated at 8.4 MMBtu/hr each and fire natural gas with distillate fuel as an emergency backup fuel. The boilers will be installed in 2025, and each will exhaust through its own stack, designated B1 and B2.

1. BACT Findings

Following is a BACT analysis for control of emissions from boilers EUB1 and 2.

a. Particulate Matter (PM, PM_{10}, $PM_{2.5}$)
TRANSFLO has proposed to burn only low-ash content fuels (natural gas and distillate fuel) in the boilers and to optimize combustion conditions by performing annual boiler tune-ups. Additional add-on pollution controls are not economically feasible.

BACT for $PM/PM_{10}/PM_{2.5}$ emissions from EUB1 and 2 is the use of natural gas as fuel with distillate fuel as an emergency backup fuel, the performance of annual tune-ups, and the emission limits listed in the tables below.

b. Sulfur Dioxide (SO_2)
TRANSFLO has proposed firing only natural gas and distillate fuel in boilers EUB1 and 2. The use of these fuels results in minimal emissions of SO_2, and additional add-on pollution controls are not economically feasible.

BACT for SO_2 emissions from EUB1 and 2 is the use of natural gas and distillate fuel, and the emission limits listed in the tables below.

c. Nitrogen Oxides (NO_x)
TRANSFLO considered several control strategies for the control of NO_x including Selective Catalytic Reduction (SCR), Selective Non-Catalytic Reduction (SNCR), flue gas recirculation (FGR), water/steam injection, low-NO_x burners, and annual tune-ups.

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 EUB1 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 EUB1 and 2, as well as low-NO_x burners, and annual tune-ups have been determined to be feasible and has been selected as part of the BACT strategy.

BACT for NO_x emissions from EUB1 and 2 is the use of FGR, low-NO_x burners, annual tune-ups, and the emission limits listed in the tables below.

d. Carbon Monoxide (CO) and Volatile Organic Compounds (VOC)
TRANSFLO considered several control strategies for the control of CO and VOC including oxidation catalysts, thermal oxidizers, and performance of an annual tune-up on the units.

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 performance of annual tune-ups has been determined to be feasible and has been selected as part of the BACT strategy for EUB1 and 2.

BACT for CO and VOC emissions from EUB1 and 2 is the performance of annual tune-ups and the emission limits listed in the tables below.

e. Emission Limits

The BACT emission limits for boilers EUB1 and 2 were based on the following:

Natural Gas

$PM/PM_{10}/PM_{2.5}$	–	0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BACT
SO_2	–	0.6 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
NO_x	–	100 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
CO	–	84 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
VOC	–	5.5 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
Visible Emissions	–	06-096 C.M.R. ch. 101

Distillate Fuel

$PM/PM_{10}/PM_{2.5}$	–	0.08 lb/MMBtu based on 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 boilers EUB1 and 2 are the following:

Unit	Fuel	Pollutant	lb/MMBtu
EUB1	Natural Gas	PM	0.05
EUB2		PM	0.05
EUB1	Distillate Fuel	PM	0.08
EUB2		PM	0.08

Unit	Fuel	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)
EUB1	Natural Gas	0.42	0.42	0.42	0.01	0.83	0.70	0.05
EUB2		0.42	0.42	0.42	0.01	0.83	0.70	0.05
EUB1	Distillate Fuel	0.67	0.67	0.67	0.01	1.16	0.29	0.02
EUB2		0.67	0.67	0.67	0.01	1.16	0.29	0.02

2. Visible Emissions

   Visible emissions from EUB1 and 2 shall each not exceed 10% opacity each on a six-minute block average basis while firing natural gas.

   Visible emissions from EUB1 and 2 shall each not exceed 20% opacity each on a six-minute block average basis while firing distillate fuel.

3. Boiler Tune-ups

   The annual boiler tune-ups shall include the following:

   1. Inspect the burner, and clean or replace any component of the burner as necessary.
   2. Inspect the flame pattern and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications.
   3. Optimize total emissions of NO_x, consistent with manufacturer's specifications.
   4. Measure the concentration in the effluent stream of NO_x 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 NO_x analyzer.

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

   Due to their size, EUB1 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]

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

   Gas-fired boilers are exempt from 40 C.F.R. Part 63, Subpart JJJJJJ. However, boilers which fire fuel oil are not. A "gas-fired boiler" is defined as any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year. [40 C.F.R. § 63.11237]

   In order to maintain the classification of gas-fired boilers, TRANSFLO may only fire distillate fuel in Boilers EUB1 and 2 during periods of gas curtailment or supply interruption (as defined in 40 C.F.R. § 63.11237 "Period of gas curtailment or supply interruption"), startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

C. Transloading Activities

TRANSFLO is proposing to expand the operation of its existing transloading activities to include materials that are not categorically exempt from air emission licensing according to 06-096 C.M.R. ch. 115, Appendix B. At present, TRANSFLO transfers categorically exempt materials such as plastic pellets from railcars to trucks for further distribution. TRANSFLO is proposing to add the transfer of liquids, such as fuel grade ethanol, and solid materials, including beans, cement, corn starch, flour, industrial sand, lime, malt, and sodium carbonate.

The transloading of liquids is performed using two primary methods. The first uses a pump to transfer liquid material from a rail car to a tank truck and uses a vapor balance return line which returns the displaced vapor from the truck back to the rail car. The vapor balance method is typically for materials with a VOC partial vapor pressure of at least 0.5 pounds per square inch absolute (psia). However, as discussed in the BACT analysis section below, TRANSFLO proposes a lesser threshold of 5 millimeters of mercury (mmHg) which equates to 0.1 psia. For products with vapor pressures below the threshold, TRANSFLO proposes a second method which involves pumping the material to the truck tank and/or pressurizing the rail car and forcing the material into the truck tank trailer and allowing the displaced vapors to be released to atmosphere.

TRANSFLO typically uses portable pumps to transload materials. In general, TRANSFLO uses two main pump sizes: The smaller pump has an effective maximum operating capacity of approximately 150 gallons per minute, and the larger pump has a maximum operating capacity of approximately 400 gallons per minute. Larger pumps are used for high volume commodities, such as fuel grade ethanol. As discussed above, an air compressor may also be used to transfer liquid products. Typically, air compressors are used for low vapor pressure materials that do not require vapor balance. The typical transfer rate using an air compressor is 150 gallons per minute.

The solid material transfer equipment can be divided into two main types. The first equipment type involves covered (or enclosed) conveyors. These covered conveyors are operated under negative air pressure, with the air flow being exhausted through a fabric filter. Exhaust air flow rates from this process can vary between 600 and 2,000 actual cubic feet per minute with material transfer rates of up to 50 tons per hour. The second type of solid transfer equipment involves pneumatic transfer equipment in which material is carried by blown air through a transfer tube and then deposited in a closed trailer. The dust-laden displaced air is then returned to the rail car. This transfer process similarly has a material handling rate of up to 50 tons per hour.

1. BACT Discussion

   TRANSFLO performed a BACT analysis where several control strategies were examined for the control of emissions from both the liquid and solid transloading activities.

   Liquid transloading control options which were examined included oxidation, vapor combustion, vapor recovery, refrigeration condensing, carbon absorption, wet scrubbers, and the use of a vapor balance system. BACT for liquid transfer operations was determined to be the use of a vapor balance system when transferred material contains VOC or HAP, and the partial vapor pressure is greater than 5 mmHg (i.e., 0.1 psia).

   Solid transloading control options which were examined include the use of fabric filters/baghouse, the total enclosure of the transloading activity, electrostatic precipitation, wet scrubbers, and cyclone separators. For all solid material transloading, BACT was determined to be the use of fabric filters/baghouse for particulate matter control. When conveyors are used to transload solid material, the BACT determination includes enclosing the conveyors and using fabric filters/baghouse controls and ensuring inward air flow towards the fabric filters/baghouse at transfer points.

   Additionally, TRANSFLO shall operate all transloading equipment according to its manufacturers' written instructions or TRANSFLO's written operating procedures. A copy of those instructions or procedures shall be provided to the Department upon request.

2. Emissions

   Due to the variability of the materials being transloaded, the Department considers the emissions from this process to be unquantifiable. Worst case emission estimates put PM, PM_{10}, and $PM_{2.5}$ emissions each below 2 tons per year and total HAP emissions well below 1 ton per year.

   TRANSFLO shall maintain records of type and quantity of materials conveyed in this licensed process and make these records available to the Department upon request.

3. Visible Emissions

   All visible emissions shall only be released from control equipment exhaust points and shall not exceed the applicable general process emissions limit defined below.

4. Proposed Non-Exempt Materials

   In the TRANSFLO application, the following materials were identified to be transloaded at the facility.

   Liquid:
   - Fuel Grade Ethanol

   Solids:
   - Beans
   - Cement
   - Corn Starch
   - Flour
   - Industrial Sand
   - Lime
   - Malt
   - Sodium Carbonate
   - Corn Starch
   - Plastic Pellets

   If TRANSFLO intends to transload materials that differ from those described in the application for this air emission license, TRANSFLO is required to obtain Department approval before doing so. Note: This approval may not necessarily require an amendment to this air emission license.

5. Exempt Activities

   Identified in the TRANSFLO initial air emission license application was transloading activities which are categorized as exempted activities in 06-096 C.M.R. ch. 115.

   According to 06-096 C.M.R. ch. 115, Appendix B, § B(8), *Operation, loading and unloading storage of butane, propane, or liquefied petroleum gas (LPG) tanks having a capacity under forty thousand gallons,* the transloading of the following materials are considered exempt due to the maximum capacity of their respective tanks:

   - Butane
   - Propane

   According to 06-096 C.M.R. ch. 115, Appendix B, § B(18), *Tanks, vessels, and pumping equipment, with lids or other appropriate closure for storage or dispensing of aqueous solutions of inorganic salts, bases and acids,* the transloading of the following materials are considered exempt due to their chemical composition:

- Diesel Exhaust Fluid
- Hydrogen Peroxide
- Magnesium Hydroxide Slurry
- Sodium Hydroxide Slurry
- Sulfuric Acid (<99%)

According to 06-096 C.M.R. ch. 115, Appendix B, § B(19), *Equipment used exclusively to pump, load, unload or store high boiling point organic material, material with initial boiling point (IBP) not less than 150ºC or vapor pressure not more than 5 mm Hg at 21ºC with lids or other appropriate closure,* the transloading of the following materials are considered exempt due to their physical properties:

- Renewable Diesel
- Biodiesel
- Ethylene Glycol
- Propylene Glycol
- Petroleum Lubricating Oil (including used)
- Vegetable/ Cooling Oils (including used)

In addition to the above listed materials, TRANSFLO identified the following materials which their handling does not result in the emissions of any criteria or hazardous air pollutants:

- Carbon Dioxide
- Corn Syrup
- Liquid Latex
- Containerized Solid Waste

6. Applicability of Federal and State Regulations

   There are no federal or state regulations that specifically apply to the transloading activities described above.

D. General Process Emissions

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

Visible emissions from any baghouse shall not exceed 10% on a six-minute block average basis.

E. Fugitive Emissions

TRANSFLO 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.

TRANSFLO 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.

F. Alternative Visible Emission Test Method

TRANSFLO has requested to use an EPA Alternative Method 082 as outlined in ASTM D7520-09, the Digital Camera Opacity Technique (DCOT) in lieu of EPA Method 9 to determine visible emissions opacity at their facility. DCOT utilizes a digital camera in conjunction with analysis software to determine plume opacity. In a letter[1] dated May 15, 2012, the United States Environmental Protection Agency approved the use of DCOT to be used in lieu of EPA Method 9 to demonstrate compliance with the visible emission standards required in both 40 C.F.R. Part 60 and Part 63. Keeping with this determination, The Department will allow TRANSFLO to use either Method 9 or DCOT for demonstrating compliance with the visible emission requirements of this air emission license.

Additionally, TRANSFLO shall submit a copy of ASTM D7520-09 to the department before DCOT is used for any compliance demonstration at the facility.

G. 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 each boiler for 8,760 hr/yr firing natural gas; and
- The assumption that emissions from the remaining process equipment are unquantifiable.

[1] https://www.epa.gov/sites/default/files/2020-08/documents/alt082.pdf

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
Boilers (EUB1 and EUB2)	3.7	3.7	3.7	0.1	7.3	6.1	0.4
Total TPY	**3.7**	**3.7**	**3.7**	**0.1**	**7.3**	**6.1**	**0.4**

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 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 TRANSFLO 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-1190-71-A-N 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 TRANSFLO 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**

A. Boilers EUB1 and 2 are licensed to fire natural gas or distillate fuel. [06-096 C.M.R. ch. 115, BACT]

B. Boilers EUB1 and 2 shall be equipped with low-NO_x burners and FGR, which shall be operated and maintained in accordance with manufacturers' recommendations. A copy of those recommendations shall be provided to the Department upon request. [06-096 C.M.R. ch. 115, BACT]

C. An annual tune-up shall be performed on boilers EUB1 and 2 and records shall be kept demonstrating compliance. [06-096 C.M.R. ch. 115, BACT]

D. Operational Limitation

TRANSFLO may only fire distillate fuel in Boilers EUB1 and 2 during periods of gas curtailment or supply interruption (as defined in 40 C.F.R. § 63.11237 "Period of gas curtailment or supply interruption"), startups, or for periodic testing, maintenance, or operator training on liquid fuel. Periodic testing, maintenance, or operator training on liquid fuel shall not exceed a combined total of 48 hours during any calendar year. [06-096 C.M.R. ch. 115, BPT]

E. The annual boiler tune-up shall include the following: [06-096 C.M.R. ch. 115, BACT]

1. Inspect the burner, and clean or replace any component of the burner as necessary.

2. Inspect the flame pattern and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications.

3. Optimize total emissions of NO_x, consistent with manufacturer's specifications.

4. Measure the concentration in the effluent stream of NO_x 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 NO_x analyzer.

F. Emissions shall not exceed the following:

Emission Unit	Fuel	Pollutant	lb/MMBtu	Origin and Authority
EUB1	Natural Gas	PM	0.05	06-096 C.M.R. ch. 115, BACT
EUB2		PM	0.05	06-096 C.M.R. ch. 115, BACT
EUB1	Distillate Fuel	PM	0.08	06-096 C.M.R. ch. 115, BACT
EUB2		PM	0.08	06-096 C.M.R. ch. 115, BACT

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

Unit	Fuel	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)
EUB1	Natural Gas	0.42	0.42	0.42	0.01	0.83	0.70	0.05
EUB2		0.42	0.42	0.42	0.01	0.83	0.70	0.05
EUB1	Distillate Fuel	0.67	0.67	0.67	0.01	1.16	0.29	0.02
EUB2		0.67	0.67	0.67	0.01	1.16	0.29	0.02

H. Visible emissions from EUB1 and 2 shall each not exceed 10% opacity on a six-minute block average basis when firing natural gas. [06-096 C.M.R. ch. 101, § 4(A)(3)]

I. Visible emissions from EUB1 and 2 shall each not exceed 20% opacity on a six-minute block average basis when firing distillate fuel. [06-096 C.M.R. ch. 101, § 4(A)(2)]

(18) **Transloading**

A. If TRANSFLO intends to transload materials that differ from those described in the application for this air emission license, TRANSFLO is required to obtain Department approval before doing so. Note: This approval may not necessarily require an amendment to this air emission license. [06-096 C.M.R. ch. 115, BACT]

B. TRANSFLO shall operate all transloading equipment according to its manufacturers' written instructions or TRANSFLO's written operating procedures. A copy of those instructions or procedures shall be provided to the Department upon request. [06-096 C.M.R. ch. 115, BACT]

C. TRANSFLO shall use a vapor balance system when transferred material contains VOC or HAP, and the partial vapor pressure is greater than 5 mmHg (i.e., 0.1 psia). [06-096 C.M.R. ch. 115, BACT]

D. For all solid material transloading (except for plastic pellets, which are exempt), TRANSFLO shall use fabric filters/baghouse for particulate matter control. [06-096 C.M.R. ch. 115, BACT and 06-096 C.M.R. ch. 115 Appendix B § A(47)]

E. When conveyors are used to transload solid material, the conveyors shall be enclosed and shall maintain an inward air flow towards the fabric filters/baghouse at transfer points. [06-096 C.M.R. ch. 115, BACT]

F. All visible emissions shall only release from control equipment exhaust points. [06-096 C.M.R. ch. 115, BACT]

(19) **General Process Sources**

A. 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)]

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

(20) **Fugitive Emissions**

A. TRANSFLO 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. TRANSFLO 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)]

(21) **Alternative Visible Emissions Test Method**

A. TRANSFLO may use the Digital Camera Opacity Technique (DCOT) in lieu of EPA Method 9 to determine visible emissions opacity at their facility. [06-096 C.M.R. ch. 115, BPT]

B. TRANSFLO shall submit a copy of ASTM D7520-09 to the department before DCOT is used for any compliance demonstration at the facility. [06-096 C.M.R. ch. 115, BPT]

(22) 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, TRANSFLO may be required to submit additional information. Upon written request from the Department, TRANSFLO 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 17th DAY OF SEPTEMBER, 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: 3/6/25
Date of application acceptance: 3/11/25

This Order prepared by Chris Ham, Bureau of Air Quality.