STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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DEPARTMENT ORDER

Twin Rivers Paper Company LLC **Aroostook County** **Madawaska, Maine** **A-263-70-G-R/A**	**Departmental** **Findings of Fact and Order** **Part 70 Air Emission License** **Renewal and Amendment**

FINDINGS OF FACT

After review of the Part 70 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

FACILITY	Twin Rivers Paper Company LLC (Twin Rivers)
LICENSE TYPE	Part 70 License Renewal and Part 70 Minor License Modification
NAICS CODES	322121 (Paper (except Newsprint) Mills)
NATURE OF BUSINESS	Paper Mill
FACILITY LOCATION	82 Bridge Avenue, Madawaska, Maine

Twin Rivers Paper Company LLC (Twin Rivers) is an integrated specialty paper company that manufactures packaging, label, and publishing products from pulp piped from the company's Edmundston, New Brunswick pulp mill.

Twin Rivers has the potential to emit more than 100 tons/year of sulfur dioxide (SO_2), nitrogen oxides (NO_x), and volatile organic compounds (VOC); therefore, the source is classified as a major source for criteria pollutants.

Twin Rivers does not have the potential to emit 10 tons/year or more of a single hazardous air pollutant (HAP) or 25 tons/year or more of combined HAP; therefore, the source is classified as an area source for HAP.

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

Fuel Burning Equipment

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Max. Firing Rate	Fuel Type	Manuf. Date	Install. Date	Stack #
Boiler #6	240	1,600 gal/hr	#6 Fuel oil Specification waste oil Distillate fuel (for startup)	1949	1949	2
PD[1] #1	5.0	1,940 scf/hr[2]	Propane	1966	1966	Roof vents
PD #2	5.0	1,940 scf/hr	Propane	1966	1966	Roof vents
PD #3	5.0	1,940 scf/hr	Propane	1966	1966	Roof vents
PD #4	5.0	1,940 scf/hr	Propane	1966	1966	Roof vents
PD #5	7.0	1,716 scf/hr	Propane	1996	1996	Roof vents
PD #6	7.0	1,716 scf/hr	Propane	1996	1996	Roof vents
PD #11	3.0	1,176 scf/hr	Propane	1994	1994	Roof vents
PD #12	6.2	2,406 scf/hr	Propane	1994	1994	Roof vents
PD #13	6.2	2,406 scf/hr	Propane	1994	1994	Roof vents

[1] PD = Propane-Fired Dryers
[2] Firing rates for propane heaters are based on a heating value of 2,577 Btu/scf.

PD #11, #12, and #13 are associated with Paper Machine #7 and PM #7 Online Coater.
PD #1, #2, #3, #4, #5, and #6 are associated with C-2 Off Machine Coater.

Generator and Fire Pumps

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Max. Firing Rate (gal/hr)	Output (hp)	Fuel Type	Manuf. Date	Install. Date
Diesel Generator Entity No. ME61	0.6	4.4	86	Distillate fuel	1989	1990
IT Backup Generator	0.59	4.3	60 kW	Distillate fuel	2021	2022
Diesel Fire Pump #1 Entity No. P1300	2.2	16.1	350	Distillate fuel	1971	1972
Diesel Fire Pump #2 Entity No. P1326	1.8	13.1	290	Distillate fuel	1971	1972

Process Equipment

Equipment	Max. Production Rate/Loading Rate/Capacity	**Pollution Control Equipment**	Install. Date
TK13854 (Starch Silo)	7,500 lb/hr	Baghouse	November 2013
TK13855 (Starch Silo)	1,200 lb/hr	Baghouse	November 2013
TK13856 (Talc Silo)	4,500 lb/hr	Baghouse	September 2016
Paper Machine #4 PM #4 Size Press	50,000 tons/year	--	1927
Paper Machine #5	76,000 tons/year	--	1928
Paper Machine #7 PM #7 Online Coater	70,000 tons/year	--	1960
Paper Machine #8 PM #8 Size Press	130,000 tons/year	--	1970
C-2 Off Machine Coater (aqueous)	80,000 tons/year	--	1966

Twin Rivers also has clay slurry storage tanks and associated positive displacement pumps that are considered insignificant activities per Appendix B, Section A, Item 25 of *Part 70 Air Emission License Regulations,* 06-096 C.M.R. ch. 140.

Parts Washers

Equipment	Washer Type	Fill Capacity (Gallons)
Parts Washer #1-10	30-gallon drum (each)	20 (each)
Parts Washer #11a, #11-14	45-gallon tank (each)	30 (each)
Parts Washer #15-16	5-gallon portable (each)	5 (each)
Parts Washer #17	45-gallon tank	30
Parts Washer #18	20-gallon dip tank	20
Parts Washer #19	30-gallon drum	20

Fuel Storage Tanks

Equipment	Capacity (Gallons)	**Install. Date**
Gasoline Storage Tank Entity No. TK1442	500	2003
#6 Fuel Oil Storage Tank Entity No. TK 1440	150,000	2001
Distillate Fuel Storage Tank Entity No. TK1422	4,000	Pre-1986

The Gasoline Storage Tank and Distillate Fuel Storage Tank are considered insignificant activities per of 06-096 C.M.R. ch. 140, Appendix B, Section B.8. Although considered an insignificant activity, the Gasoline Storage Tank is subject to requirements in *Gasoline*

Dispensing Facilities Vapor Control, 06-096 C.M.R. ch. 118 and *NESHAP for Source Category: Gasoline Dispensing Facilities*, 40 C.F.R. Part 63, Subpart CCCCCC. These requirements have been included in this air emission license. The #6 Fuel Oil Storage Tank is not considered an insignificant activity but is also not subject to any state or federal air-related regulations, and thus will not be discussed further in this air emission license.

The fuel storage tanks are not subject to *Degassing of Petroleum Storage Tanks, Marine Vessels, and Transport Vessels*, 06-096 C.M.R. ch. 170. The Gasoline Storage Tank's capacity is less than 39,000 gallons. The Distillate Fuel Storage Tank and #6 Fuel Oil Storage Tank do not contain affected product as defined in 06-096 C.M.R. ch. 170. [06-096 C.M.R. ch. 170 §§ 1(B)(1) and 3(A)]

The fuel storage tanks are not subject to *Control of Petroleum Storage Facilities*, 06-096 C.M.R. ch. 171, because they are not located at a petroleum storage facility as defined in 06-096 C.M.R. ch. 171. [06-096 C.M.R. ch. 171 §§ 2(M) and 3(B)]

Twin Rivers has additional insignificant activities which do not need to be listed in the emission equipment tables above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

C. Acronyms and Units of Measure

ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BPT	Best Practical Treatment
C.F.R.	Code of Federal Regulations
C.M.R.	Code of Maine Rules
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emissions Monitoring System
CMS	Continuous Monitoring System
CO	carbon monoxide
COMS	Continuous Opacity Monitoring System
EPA or US EPA	United States Environmental Protection Agency
gal/hr	gallon per hour
GHG	greenhouse gases
HAP	Hazardous Air Pollutants
Hg	mercury
lb	pound
lb/hr	pounds per hour
lb/MMBtu	pounds per million British thermal units

M.R.S.	Maine Revised Statutes
MMBtu	million British thermal units
MMBtu/hr	million British thermal units per hour
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	particulate matter less than 100 microns in diameter
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
RACT	Reasonably Available Control Technology
RICE	reciprocating internal combustion engine
SO_2	sulfur dioxide
ton/hr	ton per hour
tpy	ton per year
VOC	volatile organic compounds

D. Definitions

Distillate Fuel means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in ASTM D396;
- Diesel fuel oil numbers 1 or 2, as defined in ASTM D975;
- Kerosene, as defined in ASTM D3699;
- Biodiesel, as defined in ASTM D6751; or
- Biodiesel blends, as defined in ASTM D7467.

Malfunction means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Portable or Non-Road Engine means an internal combustion engine which is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform. This definition does NOT include engines which remain or will remain at a location (excluding storage locations) for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source. A location is any single site at a building, structure, facility, or installation. Any

engine that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period.

An engine is not a non-road (portable) engine if it remains or will remain at a location for more than 12 consecutive months or for a shorter period of time if sited at a seasonal source. A seasonal source is a source that remains in a single location for two years or more and which operates for fewer than 12 months in a calendar year. If an engine operates at a seasonal source for one entire season, the engine does not meet the criteria of a non-road (portable) engine and is subject to applicable stationary engine requirements.

Records or *Logs* mean either hardcopy or electronic records.

Specification Waste Oil means a petroleum-based oil which, through use or handling, has become unsuitable for its original purpose due to the presence of impurities or loss of original properties, and meets all of the following requirements:

- It has sufficient liquid content to be free flowing;
- It meets all of the constituent and property standards as specified in *Waste Oil Management Rules*, 06-096 C.M.R. ch. 860;
- It does not otherwise exhibit hazardous waste characteristics; and
- It has not been mixed with a hazardous waste.

E. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the issued date of this license.

The application for Twin Rivers is for the renewal of their existing Part 70 Air Emission License and subsequent Part 70 amendments, pursuant to Section 2(A) of *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 140. Twin Rivers has also requested incorporation into the Part 70 Air Emission License the relevant terms and conditions of the New Source Review (NSR) license issued to the facility pursuant to *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115, which is A-263-77-3-A issued on September 4, 2024. Therefore, the license is a Part 70 License renewal with the incorporation of NSR requirements via a Part 70 Minor License Modification.

F. Facility Description

Twin Rivers owns and operates a paper mill in Madawaska, Maine. Most pulp is received from the Twin Rivers facility across the river from the Madawaska mill in Edmundston, New Brunswick, Canada. The pulp is conveyed by pipeline to Twin Rivers' Madawaska mill. Twin Rivers uses different mixtures of pulps and coating to produce lightweight coated and uncoated packaging, label, and publishing products on four paper machines. Twin Rivers receives most of its steam from the facility in Edmundston but also has a limited use backup boiler (Boiler #6) at its Madawaska facility.

Other industrial processes at the Madawaska mill include starch loading and storage; a coating preparation area; a finishing, converting, and shipping area; a process wastewater treatment operation; and a solid waste landfill.

G. General Facility Requirements

Twin Rivers is subject to the following state and federal regulations listed below in addition to the regulations listed for specific units as described further in this license.

Citation	Requirement Title
06-096 C.M.R. ch. 101	Visible Emissions Regulation
06-096 C.M.R. ch. 102	Open Burning
06-096 C.M.R. ch. 103	Fuel Burning Equipment Particulate Emission Standard
06-096 C.M.R. ch. 105	General Process Source Particulate Emission Standard
06-096 C.M.R. ch. 106	Low Sulfur Fuel Regulation
06-096 C.M.R. ch. 109	Emergency Episode Regulations
06-096 C.M.R. ch. 110	Ambient Air Quality Standards
06-096 C.M.R. ch. 116	Prohibited Dispersion Techniques
06-096 C.M.R. ch. 118	Gasoline Dispensing Facilities Vapor Control
06-096 C.M.R. ch. 130	Solvent Cleaners
06-096 C.M.R. ch. 137	Emission Statements
06-096 C.M.R. ch. 138	Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides
06-096 C.M.R. ch. 140	Part 70 Air Emission License Regulations
06-096 C.M.R. ch. 144	National Emission Standards for Hazardous Air Pollutants
40 C.F.R. Part 63, Subpart ZZZZ	National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 63, Subpart JJJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
40 C.F.R. Part 70	State Operating Permit Programs

II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

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 as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. NO_x RACT (Reasonably Available Control Technology)

Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides, 06-096 C.M.R. ch. 138 (NO_x RACT) is applicable to sources that have the potential to emit quantities of NO_X equal to or greater than 100 tons/year. Air Emission License Amendments A-263-71-D-M (December 28, 1994) and A-263-71-E-A (April 16, 1996) and the subsequently issued Air Emission License Renewal A-263-71-B-R (issued June 9, 1998) addressed NO_x RACT requirements. NO_x RACT requirements were subsequently revised in A-263-70-E-R/A (August 14, 2018). The NO_x RACT requirements are incorporated in this renewal.

C. VOC RACT (Reasonably Available Control Technology)

Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds, 06-096 C.M.R. ch. 134 (VOC RACT) is applicable to sources that have the potential to emit quantities of VOC equal to or greater than 40 tons/year from non-exempt equipment. Twin Rivers does have the potential to emit quantities of VOC greater than 40 tons/year; however, VOC emissions from certain parts of the facility, including the combustion sources Boiler #6, Paper Machines #4, #5, #7, and #8, and the online and off-line dryers and coaters, are all exempt from this rule per Ch. 134, Section 1(C)(4). With the exemptions mentioned above, the facility's remaining potential to emit for VOC is less than 40 tons/year; therefore, Twin Rivers is not subject to VOC RACT. [06-096 C.M.R. ch. 134, §§ 1(C)(4) and 1(C)(7)]

D. Mandatory Greenhouse Gas (GHG) Reporting

Federal regulation *Mandatory Greenhouse Gas Reporting*, 40 C.F.R. Part 98, is applicable to some facilities as addressed in *General Provisions, Who must report?*, 40 C.F.R. § 98.2. These are not considered "applicable requirements" for the purposes of Part 70 licenses. Therefore, this information is presented for informational purposes only.

E. Compliance Assurance Monitoring (CAM)

Compliance Assurance Monitoring, 40 C.F.R. Part 64 is applicable to units at major sources if the unit has emission limits, a control device to meet the limits, and pre-control emissions greater than 100% of the major source threshold, which is 100 tons/year for any pollutant.

This regulation's 40 C.F.R. § 64.2(b)(1)(vi) specifies the exemption from specific CAM requirements for any emission unit subject to emission limitations or standards for which a Part 70 air emission license specifies a continuous compliance determination method. Furthermore, 40 C.F.R. § 64.2(b)(1)(i) specifies the exemption from specific CAM requirements for any emission unit subject to emission limitations or standards in a NSPS or NESHAP regulation proposed by the Administrator after November 15, 1990. [40 C.F.R. Part 64 § 64.2(b)]

The following table lists units with licensed emissions of specific pollutants greater than 100 tons/year. Because neither unit is equipped with a control device for that pollutant, they do not meet CAM applicability criteria and are therefore not subject to CAM requirements in accordance with 40 C.F.R. § 64.2(a).

40 C.F.R. Part 64 Applicability Table

Unit	Pollutant	CAM Required	Reason	Regulatory Authority
Boiler #6	SO_2	No	No SO_2-specific control device	40 C.F.R. § 64.2(a)
Paper Coating and Solvent Degreasing	VOC	No	No VOC-specific control device	40 C.F.R. § 64.2(a)

Therefore, there are no units at this facility subject to CAM requirements.

F. Fuel Sulfur Content Requirements

Twin Rivers is 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 at this facility shall not exceed 0.0015% by weight (15 ppm).

Twin Rivers is licensed to fire residual fuel (includes #6 fuel oil). With limited exceptions, no person shall import, distribute, or offer for sale any residual fuel oil with a sulfur content greater than 0.5% by weight pursuant to 38 M.R.S. §§ 603-A(2)(A)(1) and (2). Therefore, the residual fuel purchased or otherwise obtained for use at this facility shall not exceed 0.5% by weight.

G. HAP Status

In the past, Twin Rivers had sent an initial notification for the following MACT subparts applicable to major HAP sources:

- *National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Pulp and Paper Industry,* 40 C.F.R. Part 63, Subpart S (Subpart S), submitted April 12, 1999;
- *NESHAP: Paper and Other Web Coating*, 40 C.F.R. Part 63, Subpart JJJJ (Subpart JJJJ), submitted November 24, 2004; and
- *NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*, 40 C.F.R. Part 63, Subpart DDDDD (Subpart DDDDD), submitted March 4, 2005.

As clearly articulated in the notification Twin Rivers (then Fraser Papers Inc.) sent to Susan Lancey at EPA Region 1 on April 12, 1999, the facility was unsure of the applicability of Subpart S and of their status as an area source and erred on the side of caution. The facility continued to act out of caution with their Initial Notification submittals for Subpart JJJJ and Subpart DDDDD, which were submitted May 14, 2003, and March 4, 2005, respectively.

After reviewing the facility's HAP emissions inventory submittals for 2011 and 2014 and historical HAP emissions provided by the facility, the Department determined that Twin Rivers is an area source of HAP and not a major source of HAP. This conclusion was documented in the previous air emission license renewal, A-263-70-E-R/A (August 14, 2018). This license includes facility-wide HAP limits which will ensure the facility's continued area source status.

H. Facility-Wide HAP Limit

In order for Twin Rivers to remain an area source of HAP, Twin Rivers shall limit facility-wide HAP emissions to no more than 9.9 tons/year for a single HAP and 24.9 tons/year for total HAPs, on a 12-month rolling total basis. To demonstrate compliance with these limits, Twin Rivers shall maintain and make available upon request a current list of all HAP-containing materials in use at the facility. This list shall provide the necessary data to determine compliance, including:

- Names and types of all HAP-containing materials in use;
- Identification of each HAP in these materials;
- Percent HAP by weight or pounds of HAP per gallon for each material;
- The quantity of HAP-containing materials purchased on a monthly basis; and
- The quantity of HAP-containing materials shipped offsite on a monthly basis.

All HAP in these materials is assumed to be released into the atmosphere. Monthly HAP totals shall be determined using the following equation:

$$\text{Monthly HAP Emissions} = \sum_{i=1}^{n}(\text{A x HAP content}) - (\text{B x HAP Content})$$

Where:
i = each HAP containing material used at the facility during the month
n = the number of HAP containing materials used at the facility during the month
A = monthly facility usage of each HAP containing material
B = Quantities of each HAP containing material shipped offsite

Twin Rivers may elect to not include material shipped offsite, which will result in a conservatively high estimate of HAP emissions.

The monthly totals of HAPs shall be used to calculate and track HAP emissions on a 12-month rolling total basis. Twin Rivers shall make these records available to the Department upon request.

I. Boiler #6

Boiler #6 is a Combustion Engineering Model CE-VOX-3676 boiler that was manufactured and installed in 1949. Boiler #6 was designed with a heat input capacity of 240 MMBtu/hr and combusts #6 fuel oil with a maximum sulfur content of 0.5% by weight; specification waste oil (as defined in Section 4.B. of *Waste Oil Management Rules*, 06-096 C.M.R. ch. 860) generated onsite; and distillate fuel for startup of the boiler with a maximum sulfur content of 0.0015%. Boiler #6 is operated as a backup boiler to provide steam to the facility when steam from Twin River's Edmundston, New Brunswick facility is unavailable.

Emissions exit through Stack #2, which has an inside diameter of 89.8 inches and height of 199 feet above ground level.

1. Control Equipment

   There is no control equipment required for Boiler #6.

2. Visible Emissions

   Fuel-burning equipment with a heat input capacity of greater than 100 MMBtu/hr, such as Boiler #6, is required by *Source Surveillance – Emissions Monitoring*, 06-096 C.M.R. ch. 117 (Chapter 117) to use continuous emissions monitoring systems for regulated pollutants as specified in the chapter, except when the annual average capacity factor for non-gaseous fuel burned in the unit is limited to less than 30%. Boiler #6's annual average capacity factor is limited to less than 30%, as established in license amendment A-263-71-E-A (April 16, 1996). As such, Boiler #6 is exempt from the Ch. 117 COMS requirement.

   Twin Rivers does use a COMS on Boiler #6 as an operational tool for in-house use as a process monitor. However, Twin Rivers is not required by Chapter 117 or this license to demonstrate compliance using a COMS. Compliance with the visible emissions standard shall be demonstrated using 40 C.F.R. Part 60, Appendix A, Method 9 upon request rather than demonstrating through the COMS. [06-096 C.M.R. ch. 101, § 3(A)]

   a. 06-096 C.M.R. ch. 101

      Visible emissions from Boiler #6 shall not exceed 20% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time the owner or operator must meet the normal operating visible emissions standard or the following alternative visible emissions standards.

      During periods of startup, shutdown, or malfunction, visible emissions shall not exceed 30% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than one hour (10 consecutive six-minute block averages) per event. Twin Rivers shall keep records sufficient to document the date, time, and duration of each event. These records shall be maintained for at least six years and provided to the Department upon request

      [06-096 C.M.R. ch. 101, §§ 4(A)(1)(a) and 6]

   b. 06-096 C.M.R. ch. 140, BPT

      In license A-263-70-E-R/A (8/14/2018), the Department established the following visible emissions standard through BPT:

Visible emissions from Boiler #6 shall not exceed 30% opacity on a six-minute block average basis, except for no more than two six-minute block averages in a three-hour period, during which time visible emissions shall not exceed 50% opacity. [06-096 C.M.R. ch. 140, BPT]

c. Streamlining

The Department has determined that the ch. 101 visible emissions standard is more stringent than the BPT limit as previously licensed. Therefore, the visible emission limit has been streamlined to the more stringent visible emissions limit, and only the ch. 101 visible emissions limit shall be included in the Order of this air emission license.

3. New Source Performance Standards (NSPS)

Due to its year of manufacture, Boiler #6 is not subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Db for units greater than 100 MMBtu/hr manufactured after June 19, 1984. [40 C.F.R. § 60.40b(a)]

4. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

Boiler #6 is subject to *NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ (Subpart JJJJJJ). The unit is considered an existing oil boiler rated more than 10 MMBtu/hr.
[40 C.F.R. §§ 63.11193 and 63.11195]

The applicable requirements of Subpart JJJJJJ for Boiler #6 are the following:

a. Compliance Dates, Notifications, and Work Practice Requirements

(1) Initial Notification of Compliance

Twin Rivers submitted their Initial Notification to EPA on September 1, 2017. [40 C.F.R. § 63.11225(a)(2)]

(2) Boiler Tune-Up Program

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

(ii) Each tune-up shall be conducted every two 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, not to exceed 36 months from the previous inspection. [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, not to exceed 36 months from the previous inspection. [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;
2. A description of any corrective actions taken as part of the tune-up of the boiler; and
3. The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

(v) After conducting the initial boiler tune-up, Twin Rivers submitted their Notification of Compliance Status to EPA on July 28, 2017. [40 C.F.R. § 63.11225(a)(4) and 40 C.F.R. § 63.11214(b)]

(3) Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years. 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."

(4) Energy Assessment

(i) A one-time energy assessment was required to be performed by a qualified energy assessor on the applicable boilers. [40 C.F.R. § 63.11196(a)(3)] Twin Rivers conducted their one-time energy assessment on November 21, 2016.

(ii) A Notification of Compliance Status was required to be submitted to EPA upon completion of the one-time energy assessment. Twin Rivers submitted their Notification of Compliance Status to EPA on July 28, 2017. [40 C.F.R. § 63.11225(a)(4) and 40 C.F.R. § 63.11214(c)]

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 (6) 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.

EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

5. NO_x RACT Requirements

In previous licenses, Boiler #6 was determined to be meeting NOx RACT by limiting boiler operation to less than 30% of its annual capacity factor, by meeting a NO_x emission limit of 0.40 lb/MMBtu, and by limiting the NO_x emissions from Boiler #6 to less than 20 tons per month and 100 tons per year on a 12-month rolling total basis. Boiler #6 was determined to be meeting the 0.40 lb/MMBtu NOx limit by stack testing and was determined to be meeting the 100 tons/year NO_x limit by firing less than 3,378,000 gallons of #6 fuel oil in Boiler #6 in any given calendar year.

As part of the last air emission license renewal, A-263-70-E-R/A (August 14, 2018), Twin Rivers accepted a fuel limit of 2,800,000 gallons of #6 fuel oil on a 12-month rolling total basis, which is equal to 20% of Boiler #6's annual fuel capacity and a projected NO_x emissions limit less than 100 tons/year. This 12-month rolling total fuel limit prevents the triggering of the additional NO_x RACT stack testing and tune-up requirements that were necessary should they have exceeded the 2,800,000-gallon threshold. [06-096 C.M.R. ch. 138 § 1(A)] Note: Twin Rivers is still required to conduct testing and/or tune-ups and other requirements in accordance with 40 C.F.R. Part 63, Subpart JJJJJJ, as applicable.

Boiler #6 operation shall be limited to less than 20% of its annual capacity factor, a NO_x emission limit of 0.40 lb/MMBtu, a monthly NO_x emissions limit of 20 tons per month (equivalent to 667,000 gallons/month of #6 fuel oil), and an annual NO_x

emissions limit of 100 tons/year on a 12-month rolling total basis. Compliance with these limits shall be demonstrated by fuel use records kept on a monthly and 12-month rolling total basis.

6. Emission Limits and Streamlining

For Boiler #6, a listing of potentially applicable emission standards, the origin and authority of the standards, and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

Pollutant	Applicable Emission Standards	Origin and Authority	Licensed Emission Limits
PM	0.20 lb/MMBtu	06-096 C.M.R. ch. 103, § 2(A)(1)	0.20 lb/MMBtu
	48.0 lb/hr	A-263-71-B-R (6/9/1998), BPT	48.0 lb/hr
PM_{10}	48.0 0lb/hr	A-263-71-B-R (6/9/1998), BPT	48.0 lb/hr
$PM_{2.5}$	48.0 lb/hr	06-096 C.M.R. ch. 140, BPT	48.0 lb/hr
SO_2	126.08 lb/hr (based on 0.5% S limit by weight)	38 M.R.S. §§ 603-A(2)(A)	126.08 lb/hr
NO_x	0.40 lb/MMBtu	A-263-71-E-A (4/16/1996), NO_x RACT	0.40 lb/MMBtu
	96.0 lb/hr	A-263-71-B-R (6/9/1998), BPT	96.0 lb/hr
CO	8.0 lb/hr	A-263-71-B-R (6/9/1998), BPT	8.0 lb/hr
VOC	1.2 lb/hr	A-263-71-E-R/A (7/18/2014), BPT	1.2 lb/hr

Table Notes:
% S = percent fuel sulfur content, by weight

7. Emission Limit Compliance Methods

Compliance with the emission limits associated with Boiler #6 shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department. [06-096 C.M.R. ch. 140, BPT]

Pollutant	Applicable Emission Limit	Compliance Method	Frequency
PM	lb/MMBtu	40 C.F.R. Part 60, App. A, Method 5	As requested
	lb/hr		
PM_{10}	lb/MMBtu	40 C.F.R. Part 60, App. A, Method 5, or EPA Test Method 201 or 201A	As requested
	lb/hr		
$PM_{2.5}$	lb/hr	40 C.F.R. Part 60, App. A, Method 5, or EPA Test Method 201A or 202	As requested
SO_2	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO_X	lb/MMBtu	40 C.F.R. Part 60, App. A, Method 7	As requested
	lb/hr		
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested

Pollutant	Applicable Emission Limit	Compliance Method	Frequency
VOC	lb/hr	40 C.F.R. Part 60, App. A, Method 25 or 25A	As requested
Visible Emissions	% opacity	40 C.F.R. Part 60, App. A, Method 9	As requested

8. Periodic Monitoring

Twin Rivers shall monitor and record data values for Boiler #6 as indicated in the following table whenever the equipment is operating.

Boiler #6			
Parameter	**Units of Measure**	**Monitoring Tool/Method**	**Frequency**
#6 fuel oil use	Gallons	Tank fuel level marker/meter/gauge and calculations	Monthly and 12-month rolling total
Distillate fuel oil use	Gallons	Fuel flow meter	Monthly and 12-month rolling total

9. Parameter Monitors

There are no Parameter Monitors required for Boiler #6.

J. Diesel Generator, IT Backup Generator, and Diesel Fire Pumps #1 and #2

Twin Rivers operates the Diesel Generator and IT Backup Generator as emergency generators. The emergency generators are each generator sets, with each gen set consisting of an engine and an electrical generator. The Diesel Generator has an engine rated at 0.6 MMBtu/hr (86 hp), which fires distillate fuel at a rate of 4.4 gal/hr. The Diesel Generator was manufactured in 1989 and installed in 1990. The IT Backup Generator has an engine rated at 0.59 MMBtu/hr (60 kW) which fires distillate fuel. The IT Backup Generator was manufactured in 2021 and installed in 2022.

Twin Rivers also operates two fire pumps, Diesel Fire Pumps #1 and #2. Diesel Fire Pumps #1 and #2 have engines rated at 2.2 MMBtu/hr and 1.8 MMBtu/hr, respectively, which fire distillate fuel. Both fire pumps were manufactured in 1971 and installed in 1972.

1. Visible Emissions

<u>Diesel Generator and Diesel Fire Pumps #1 and #2</u>
The Diesel Generator and Diesel Fire Pumps #1 and #2 are each subject to the following visible emissions standard of 06-096 C.M.R. ch. 101.

Visible emissions from the Diesel Generator and Diesel Fire Pumps #1 and #2 shall each not exceed an opacity of 20% on a six-minute block average basis, except during periods of startup. During periods of startup, each engine must meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard. Use of the following work practice standards and alternative visible emissions standard in lieu of the normal operating visible emissions standard is limited to no more than once per day.

a. The duration of each startup shall not exceed 30 minutes per event;
b. Visible emissions during startup shall not exceed 50% opacity on a six-minute block average basis; and
c. Twin Rivers shall keep records of the date, time, and duration of each startup event.

Note: This does not limit any engine to one startup per day. It only limits the use of the alternative emission standard to once per day for each engine.

[06-096 C.M.R. ch. 101 §4(A)(4)]

IT Backup Generator
Visible emissions from the IT Backup Generator shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101 § 4(A)(4)]

2. *Stationary Generators*, 06-096 C.M.R. ch. 169

The Diesel Generator was licensed 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 3(B). Diesel Fire Pumps #1 and #2 do not convert mechanical energy produced by the engines into electricity, so they are not considered generators as defined in Ch. 169 and are therefore not subject to Ch.169.

The IT Backup Generator is subject to ch. 169. It is an emergency generator powered by an engine with a rated output of less than 1,000 brake horsepower (747 kW). Chapter 169 identifies emission standards for generator engines subject to this chapter and stack height requirements for certain generator engines subject to this chapter.

a. Chapter 169 Emission Standards Requirements

For the IT Backup Generator, Twin Rivers shall comply with the emission standards for emergency generators by complying with the applicable standards contained in 40 C.F.R. Part 60, Subpart IIII. [06-096 C.M.R. ch. 169, § 4(B)(1)]

b. Chapter 169 Stack Height Requirements

Chapter 169 identifies stack height requirements for any stack used to exhaust a generator engine or combination of generator engines with a combined rated output equal to or greater than 1,000 brake horsepower (747 kW). Individual generator engines with a maximum power capacity of less than 300 kW are not included in the assessment of the combined generator power capacity exhausted through a common stack. [06-096 C.M.R. ch. 169, § 6]

There are no stack height requirements in Chapter 169 applicable to the IT Backup Generator because it exhausts through its own stack and its rated output is less than 1,000 brake horsepower (747 kilowatts). [06-096 C.M.R. ch. 169, § 6]

3. New Source Performance Standards (NSPS)

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 C.F.R. Part 60, Subpart IIII is not applicable to the Diesel Generator and Diesel Fire Pumps #1 and #2 since the units were ordered before July 11, 2005, and manufactured before April 1, 2006.

The IT Backup Generator is subject to 40 C.F.R. Part 60, Subpart IIII 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.

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 60, Subpart IIII, a stationary reciprocating internal combustion engine (ICE) is considered an **emergency** stationary ICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under 40 C.F.R. Part 60, Subpart IIII, resulting in the engine being subject to requirements applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency

situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

(i) An emergency engine may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE more than 100 hours per calendar year.

(ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[40 C.F.R. §§ 60.4211(f) and 60.4219]

b. 40 C.F.R. Part 60, Subpart IIII Requirements

(1) Manufacturer Certification Requirement
The engine shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in 40 C.F.R. § 60.4202. [40 C.F.R. § 60.4205(b)]

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

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 60.4209(a)]

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

Twin Rivers 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]

(5) Annual Time Limit for Maintenance and Testing
As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). [40 C.F.R. § 60.4211(f)]

(6) Initial Notification Requirement
No initial notification is required under 40 C.F.R. Part 60, Subpart IIII for emergency engines. [40 C.F.R. § 60.4214(b)]

(7) Recordkeeping
Twin Rivers shall keep records that include the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time.
[40 C.F.R. § 60.4214(b)]

4. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63, Subpart ZZZZ is applicable to the Diesel Generator and Diesel Fire pumps #1 and #2**.** The units are considered existing, emergency stationary reciprocating internal combustion engines at an area HAP source and are not subject to NSPS regulations. EPA's August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary Rice*) specifically does not exempt the units from the federal requirements.

a. Emergency Engine Designation and Operating Criteria

Under Subpart ZZZZ, a stationary reciprocating internal combustion engine (RICE) is considered an **emergency** stationary RICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under Subpart ZZZZ, resulting in the engine being subject to requirements applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

(i) An emergency engine may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance

company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE more than 100 hours per calendar year.

(ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

The Diesel Generator and Diesel Fire Pumps #1 and #2 shall be limited to the usage outlined in 40 C.F.R. § 63.6640(f) and therefore may be classified as existing emergency stationary RICE as defined in 40 C.F.R. Part 63, Subpart ZZZZ. Failure to comply with all of the requirements listed in 40 C.F.R. § 63.6640(f) may cause these engines to not be considered emergency engines and therefore subject to all applicable requirements for non-emergency engines.

b. 40 C.F.R. Part 63, Subpart ZZZZ Requirements

(1) Operation and Maintenance Requirements

- Change oil and filter every 500 hours of operation or annually, whichever comes first;
- Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 C.F.R. § 63.6603(a) and Table 2(d)]

The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or Twin Rivers shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

(2) Optional Oil Analysis Program

Twin Rivers has the option of utilizing an oil analysis program which complies with the requirements of § 63.6625(i) in order to extend the specified oil change

requirement. If this option is used, Twin Rivers must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for each engine. The analysis program must be part of the maintenance plan for each engine. [40 C.F.R. § 63.6625(i)]

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 63.6625(f)]

(4) Startup Idle and Startup Time Minimization Requirements
During periods of startup, the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) and 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(5) Annual Time Limit for Maintenance and Testing
As emergency engines, the units shall each be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). [40 C.F.R. § 63.6640(f)]

(6) Recordkeeping
Twin Rivers shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, the number of hours each unit operated for non-emergency purposes, and the reason each engine was in operation during each time. [40 C.F.R. § 63.6655(f)]

5. Emission Limits

The emission limits for the Diesel Generator, the IT Backup Generator, and Diesel Fire Pumps #1 and #2 are based on the following:

$PM/PM_{10}/PM_{2.5}$	–	0.12 lb/MMBtu from A-263-70-C-R (1/20/2010), BPT for PM and PM_{10}; 06-096 C.M.R. ch. 140, BPT for $PM_{2.5}$
SO_2	–	Combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
NO_x	–	4.41 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96
CO	–	0.95 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96
VOC	–	0.36 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96
Visible Emissions	–	06-096 C.M.R. ch. 101

The emission limits for the Diesel Generator, the IT Backup Generator, and Diesel Fire Pumps #1 and #2 are the following [A-263-70-C-R (1/20/2010), BPT, A-263-77-3-A (9/4/2024), BPT, and 06-096 C.M.R. ch. 140, 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)**
Diesel Generator	0.07	0.07	0.07	0.001	2.65	0.57	0.22
IT Backup Generator	0.07	0.07	0.07	0.001	2.60	0.56	0.21
Diesel Fire Pump #1	0.26	0.26	0.26	0.003	9.70	2.09	0.79
Diesel Fire Pump #2	0.22	0.22	0.22	0.003	7.94	1.71	0.65

6. Emission Limit Compliance Methods

Compliance with the emission limits associated with the Diesel Generator, the IT Backup Generator, and Diesel Fire Pumps #1 and #2 shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

7. Periodic Monitoring

Twin Rivers shall record data and maintain records for the following periodic monitoring values for the Diesel Generator, the IT Backup Generator, and Diesel Fire Pumps #1 and #2 as indicated in the following table whenever the equipment is operating.

Parameter	**Units of Measure**	**Monitoring Tool/Method**	**Frequency**	**Authority**
Fuel oil sulfur content	Percent, by weight	Fuel receipts from supplier	As fuel is purchased	[06-096 C.M.R. ch. 137]
Operating time	Hours	Hour Meter	Recorded as it occurs, include monthly and calendar year total	[40 C.F.R. § 63.6625(f)]
Type of Operation (emergency, maintenance, etc.)	N/A	Recorded electronically or in logbook	As occurs	[40 C.F.R. § 63.6655(f)]

8. Parameter Monitors

There are no Parameter Monitors required for the Diesel Generator, the IT Backup Generator, and Diesel Fire Pumps #1 and #2.

9. CEMS and COMS

There are no CEMS or COMS required for the Diesel Generator, the IT Backup Generator, and Diesel Fire Pumps #1 and #2.

K. Paper Machines, Size Presses, and Online and Off-Line Coaters

Twin Rivers is licensed to operate the following paper machines, size presses, coaters, and dryers:

Unit	Date of Installation	Control Equipment
Paper Machine #4 PM #4 Size Press	1927	N/A
Paper Machine #5	1928	N/A
Paper Machine #7 PM #7 Online Coater PD #11, #12, and #13	1960	N/A
Paper Machine #8 PM #8 Size Press	1970	N/A
C-2 Off Machine Coater PD #1, #2, #3, #4, #5, and #6	1966	N/A

Twin Rivers operates a Paper Machine Source Group (Paper Machines #4, #5, #7, and #8) and two size presses (PM #4 and PM #8 Size Presses) for the production of paper, and two coaters (PM #7 Online Coater and C-2 Off Machine Coater) for the coating of paper. Twin Rivers shall run PM #7 Online Coater and C-2 Off Machine Coater with aqueous-based coating only. The VOC content of the coating shall be below 2.9 lb VOC/gallon. The VOC emissions from all paper coatings and additives used at the facility shall be no more than 130.0 ton/yr, including a VOC emission limit from the Paper Machine Source Group of 78.0 tons/year.

1. New Source Performance Standards (NSPS)

   There are no NSPS requirements applicable to these units.

2. National Emission Standards for Hazardous Air Pollutants (NESHAP)

   There are no emissions units at this facility subject to *National Emission Standards for Hazardous Air Pollutants*: *Paper and Other Web Coating,* 40 C.F.R. Part 63, Subpart JJJJ. This regulation is only applicable to major sources of HAP. As established in a previous section, Twin Rivers is an area source of HAP and is therefore not subject to this regulation. [40 C.F.R. § 63.3290]

3. Paper Coating Regulation, 06-096 C.M.R. ch. 123

   Twin Rivers is not subject to *Control of Volatile Organic Compounds from Paper, Film and Foil Coating Operations*, 06-096 C.M.R. ch. 123. Size presses, on-machine coaters, and off-machine coaters that use coatings with a VOC content less than

2.9 lb VOC/gallon are considered exempt from this rule. [06-096 C.M.R. ch. 123, § 1.C]

Twin Rivers shall keep records of certification stating all coatings used at the facility are below 2.9 lb VOC/gallon, excluding water and negligibly reactive VOC compounds.

4. Control Equipment

There is no control equipment required for these units.

5. Visible Emissions

Visible emissions from each ambient vent associated with the Paper Machine Source Group, the Paper Machine #7 Online Coater, and the C-2 Off Machine Coater shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

6. Periodic Monitoring

To demonstrate compliance with the VOC emission limit of 130.0 tons/year from all paper coatings and additives used at the facility on a 12-month rolling total basis, including a VOC emission limit of 78.0 tons/year from the Paper Machine Source Group, Twin Rivers shall maintain and make available upon request a record of all VOC-containing coatings and additives used on this equipment. These records shall be maintained on a monthly and 12-month rolling total basis and shall provide all necessary data to determine compliance, including the following:

a. Amount of VOC containing chemicals (in lb VOC/gallon, less water) in applied coatings;
b. Volume (in gallons) of coating applied each month; and
c. Total VOC emitted from coatings and additives on a monthly and 12-month rolling total basis.

Twin Rivers shall keep records of VOC emissions as described above on a monthly and 12-month rolling total basis.

7. Parameter Monitors

There are no parameter monitors required for this equipment.

L. Propane-Fired Dryers

Twin Rivers operates the following nine propane-fired dryers:

Equipment	Maximum Heat Input Capacity (MMBtu/hr)	Max. Firing Rate	Manufacture Date	Install. Date
PD #1	5.0	1,940 scf/hr	1966	1966
PD #2	5.0	1,940 scf/hr	1966	1966
PD #3	5.0	1,940 scf/hr	1966	1966
PD #4	5.0	1,940 scf/hr	1966	1966
PD #5	7.0	1,716 scf/hr	1996	1996
PD #6	7.0	1,716 scf/hr	1996	1996
PD #11	3.0	1,176 scf/hr	1994	1994
PD #12	6.2	2,406 scf/hr	1994	1994
PD #13	6.2	2,406 scf/hr	1994	1994

PD #1, #2, #3, #4, #5, and #6 are associated with C-2 Off Machine Coater. PD #11, #12, and #13 are associated with Paper Machine #7 and PM #7 Online Coater. The propane-fired dryers exhaust through individual roof vents. The requirements for the propane-fired dryers are addressed in the following sections.

1. New Source Performance Standards (NSPS)

   Due to their size and the fact that propane-fired dryers are not steam generating units, these units 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]

2. National Emission Standards for Hazardous Air Pollutants (NESHAP)

   The propane-fired dryers are not subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ. The propane-fired dryers fire propane and do not meet the definition of a boiler as defined in 40 C.F.R. § 63.11237 and are therefore exempt from 40 C.F.R. Subpart JJJJJJ. [40 C.F.R. §§ 63.11193, 63.11195, and 63.11237]

3. Control Equipment

   There is no control equipment required for the propane-fired dryers.

4. Emission Limits

The BPT emission limits for the Propane-fired Dryers are based on the following emission factors:

Propane

$PM/PM_{10}/PM_{2.5}$	–	0.05 lb/MMBtu based on 06-096 C.M.R. ch. 140, BPT
SO_2	–	0.018 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	–	7.5lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
VOC	–	1.0 lb/1,000 gal based on AP-42 Table 1.5-1 dated 7/08
Visible Emissions	–	06-096 C.M.R. ch. 101

The BPT emission limits for the propane-fired dryers are the following:

Unit	Pollutant	lb/MMBtu
PD #1	PM	0.05
PD #2	PM	0.05
PD #3	PM	0.05
PD #4	PM	0.05
PD #5	PM	0.05
PD #6	PM	0.05
PD #11	PM	0.05
PD #12	PM	0.05
PD #13	PM	0.05

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
PD #1	0.25	0.25	0.25	0.001	0.71	0.41	0.05
PD #2	0.25	0.25	0.25	0.001	0.71	0.41	0.05
PD #3	0.25	0.25	0.25	0.001	0.71	0.41	0.05
PD #4	0.25	0.25	0.25	0.001	0.71	0.41	0.05
PD #5	0.35	0.35	0.35	0.001	0.99	0.57	0.08
PD #6	0.35	0.35	0.35	0.001	0.99	0.57	0.08
PD #11	0.15	0.15	0.15	0.001	0.43	0.25	0.03
PD #12	0.31	0.31	0.31	0.001	0.88	0.51	0.07
PD #13	0.31	0.31	0.31	0.001	0.88	0.51	0.07

Visible emissions from each propane-fired dryer shall not exceed 10% opacity on a six-minute block average basis.

Twin Rivers shall be limited to 3,000,000 gal/yr of propane on a 12-month rolling total basis for all propane-fired dryers.

5. Compliance Methods

Compliance with the emission limits associated with the propane-fired dryers shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department.

Pollutant	Emission Limit	Compliance Method	Frequency
PM	lb/MMBtu lb/hr	40 C.F.R. Part 60, App. A, Method 5	As requested
PM_{10}	lb/hr	40 C.F.R. Part 60, App. A Method 5 or EPA Test Method 201 or 201A and 202	As requested
$PM_{2.5}$	lb/hr	40 C.F.R. Part 60, App. A, Method 5, or EPA Test Method 201 or 201A and 202	As requested
SO_2	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO_x	lb/hr	40 C.F.R. Part 60, App. A, Method 7	As requested
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested
VOC	lb/hr	49 C.F.R. Part 60, App. A, Method 25 or 25A	As requested
Visible Emissions	10% opacity on a six-minute block average basis	40 C.F.R. Part 60, App. A, Method 9	As requested

6. Periodic Monitoring

Periodic monitoring for the Propane-fired Dryers shall include recordkeeping to document fuel use both on a monthly and 12-month rolling total basis.

7. Parameter Monitors

There are no parameter monitors required for the propane-fired dryers.

M. Storage Silos TK13854, TK13855, and TK13856 (Starch Unloading and Storage)

Twin Rivers is licensed to operate Storage Silos TK13854, TK13855, and TK13856. Storage Silos TK13854 and TK13855 both store starch, and Storage Silo TK13856 stores talc. Storage Silo TK13854 was installed in 2013 and has a production rate of 7,500 lb/hr. Storage Silos TK13855 and TK13856 were both installed in 2016 and have maximum

loading rates of 1,200 lb/hr and 4,500 lb/hr, respectively. Particulate matter emissions from all three silos and their loading operations are controlled by baghouses.

1. Control Equipment and Maintenance

   Twin Rivers shall operate and maintain baghouses on Storage Silos TK13854, TK13855, and TK 13856 to control particulate matter emissions generated during the loading and unloading of the storage silos. In order to document maintenance of the baghouses, Twin Rivers shall keep a maintenance log recording the date of all bag failures and routine baghouse inspections and maintenance. [A-263-77-1-A (1/27/2017), BACT]

2. Visible Emissions

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

3. Parameter Monitors

   There are no parameter monitors required for Propane-fired Dryers.

N. Parts Washers

The parts washers were manufactured and installed before 1997. Based on the solvent used, the parts washers are subject to *Solvent Degreasers,* 06-096 C.M.R. ch. 130.

The parts washers have the following design capacities:

Equipment	Washer Type	Fill Capacity (Gallons)
Parts Washer #1-10	30-gallon drum (each)	20 (each)
Parts Washer #11a, #11-14	45-gallon tank (each)	30 (each)
Parts Washer #15-16	5-gallon portable (each)	5 (each)
Parts Washer #17	45-gallon tank	30
Parts Washer #18	20-gallon dip tank	20
Parts Washer #19	30-gallon drum	20

This equipment is exempt from *Industrial Cleaning Solvents,* 06-096 C.M.R. ch. 166 pursuant to Section (3)(B).

Periodic monitoring for the parts washers shall consist of recordkeeping including records of solvent added and removed.

O. Gasoline Storage Tank

Twin Rivers operates a 500-gallon gasoline tank.

1. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

The Gasoline Storage Tank, which has a capacity of 500 gallons, is subject to *NESHAP for Source Category: Gasoline Dispensing Facilities*, 40 C.F.R. Part 63, Subpart CCCCCC**.** The Gasoline Storage Tank has a monthly throughput of less than 10,000 gallons of gasoline.

The applicable requirements of Subpart CCCCCC for the Gasoline Storage Tank are the following:

a. Twin Rivers shall, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 C.F.R. § 63.11115(a)]

b. Twin Rivers shall keep applicable records and submit reports as specified in § 63.11125(d) and § 63.11126(b). [40 C.F.R. § 63.11115(b)]

c. Twin Rivers shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [40 C.F.R. §63.11116(a)]

(1) Minimize gasoline spills;
(2) Clean up spills as expeditiously as practicable;
(3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
(4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

d. Twin Rivers shall have records available within 24 hours of a request by the Department to document the gasoline throughput of the Gasoline Storage Tank. [40 C.F.R §63.11116(b)]

2. Although the Gasoline Storage Tank has always had a throughput below the 100,000 gallons per month applicability threshold included in *Gasoline Dispensing Facilities Vapor Control* 06-096 C.M.R. ch. 118 and thus has not been subject to requirements of 06-096 C.M.R. ch. 118 (vapor system, testing, training, and public education), the Gasoline Storage Tank is still subject to the following two requirements of that regulation:

   a. The fill pipe must extend within six inches of the bottom of the gasoline storage tank. [06-096 C.M.R. ch. 118, § 4(A)]

   b. Twin Rivers shall maintain records of the monthly and annual throughput of gasoline and notify the Department of its applicability within 30 days if the monthly or annual throughput of the Gasoline Storage Tank ever exceeds the initial applicability threshold of 06-096 C.M.R. ch. 118. These records must be maintained for a minimum of three years, be available for inspection during normal business hours, and be provided to the Department and/or EPA upon request. [06-096 C.M.R. ch. 118, § 10(B)] Note: Standard Condition (6) of this license requires all records be retained for six years; therefore, the three-year record retention requirement of 06-096 C.M.R. ch. 118 shall be streamlined to the more stringent six-year requirement.

P. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis. [6-096 C.M.R. ch. 101 § 4(B)(1)]

Q. Fugitive Emissions

Twin Rivers 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.

Twin Rivers 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.

[6-096 C.M.R. ch. 101 § 4(C)]

R. Emission Statements

Twin Rivers is subject to emissions inventory requirements contained in *Emission Statements*, 06-096 C.M.R. ch. 137. Twin Rivers shall maintain the following records in order to comply with this rule:

1. The amount of #6 fuel oil fired in Boiler #6 on a monthly basis;
2. The amount of distillate fuel fired in Boiler #6, the Diesel Generator, and Diesel Fire Pumps #1 and #2 (each) on a monthly basis;
3. The amount of propane fired in the Propane-fired Dryers (PD #1, #2, #3, #4, #5, #6, #11, #12, and #13) on a monthly basis;
4. The sulfur content of #6 fuel oil and distillate fuel fired in Boiler #6, the Diesel Generator, the IT Backup Generator, and Diesel Fire Pumps #1 and #2 on a monthly basis;
5. Calculations of the VOC and HAP emissions from the Paper Machine Source Group (including all associated size presses and online coaters) and the C-2 Off Machine Coater on a calendar year total basis; and
6. Hours each emission unit was active or operating on a monthly basis.

Twin Rivers shall report to the Department emissions of hazardous air pollutants as required by 06-096 C.M.R. ch. 137, § (3)(C). Twin Rivers shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3).
[38 M.R.S. § 353-A(1-A)]

S. Facility 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:

- Firing 2,800,000 gal/yr #6 fuel in Boiler #6;
- Firing 3,000,000 gal/yr propane in the Propane-fired Dryers (PD #1, #2, #3, #4, #5, #6, #11, #12, and #13);
- Operating the Diesel Generator, the IT Backup Generator, and Diesel Fire Pumps #1 and #2 for 100 hrs/yr each; and
- A VOC emission limit of 130 ton/yr from all paper coatings and additives used at the facility (this includes the 78.0 tons/year limit for VOC emissions from the Paper Machine Source Group).

This information does not represent a comprehensive list of license restrictions or permissions. That 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 #6	42.0	42.0	42.0	110.3	84.0	7.0	1.1
Propane-fired Dryers	6.9	6.9	6.9	--	19.5	11.3	1.5
Diesel Generator	--	--	--	--	0.1	--	--
IT Backup Generator	--	--	--	--	0.1	--	--
Diesel Fire Pump #1	--	--	--	--	0.4	0.1	--
Diesel Fire Pump #2	--	--	--	--	0.5	0.1	--
Paper Coating Process	--	--	--	--	--	--	130
Total TPY	**48.9**	**48.9**	**48.9**	**110.3**	**104.6**	**18.5**	**132.6**

Pollutant	**Tons/year**
Single HAP	9.9
Total HAP	24.9

III. AMBIENT AIR QUALITY ANALYSIS

Twin Rivers previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (see license A-263-71-B-R, issued on June 9, 1998). No substantial changes have been made to the facility since the previous air quality analysis was performed that would meaningfully affect the results of that analysis; therefore, an additional ambient air quality analysis is not required for this Part 70 License.

ORDER

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

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

The Department hereby grants the Part 70 License A-263-70-G-R/A pursuant to 06-096 C.M.R. ch. 140 and the preconstruction permitting requirements of 06-096 C.M.R. ch. 115 and subject to the standard and specific conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Twin Rivers pursuant to the Department's preconstruction permitting requirements have been incorporated into this Part 70 license, except for such conditions that the Department has determined are obsolete, extraneous, or otherwise environmentally insignificant, as explained in the Findings of Fact accompanying this Order. As such, the conditions in this license supersede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 for making such changes and pursuant to the applicable requirements in 06-096 C.M.R. ch. 140.

For each standard and specific condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

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 STATEMENTS

(1) 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. 140]

(2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 140]

(3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 C.M.R. ch. 140]

(4) 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. 140]

(5) Notwithstanding any other provision 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 Part 70 license requirement. [06-096 C.M.R. ch. 140]

(6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or affect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in their renewal application dated February 9, 2023.

Permit Shield Table

Source	Citation	Description	Basis for Determination
Boiler #6	40 C.F.R. Part 60, Subpart D	Standards of Performance for Fossil-Fuel-Fired Steam Generators	Boiler #6 is rated at less than 250 MMBtu/hr of heat input.
	40 C.F.R. Part 60, Subpart Da	Standards of Performance for Electric Utility Steam Generating Units	Boiler #6 is not an electric utility steam-generating unit and is incapable of combusting more than 250 MMBtu/hr heat input of fossil fuels.

Source	Citation	Description	Basis for Determination
Boiler #6	40 C.F.R. Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Boiler #6 was constructed prior to the applicability date (June 9, 1989) and has a heat input greater than 100 MMBtu/hr.
Boiler #6	40 C.F.R. Part 63, Subpart DDDDD	NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	Facility is not a major source of HAP.
Boiler #6	06-096 C.M.R. ch. 117	Source Surveillance – Emissions Monitoring	Boiler #6 is limited to an annual average capacity factor of less than 30% by a federally enforceable license condition.
Diesel Generator, and Diesel Fire Pumps #1 and #2	06-096 C.M.R. ch. 169	Stationary Generators	The Diesel Generator was licensed prior to the effective date of Ch. 169. Diesel Fire Pumps #1 and #2 are not considered generators as defined in 06-096 C.M.R. ch. 169.
Parts Washers	40 C.F.R. Part 63, Subpart T	NESHAP for Halogenated Solvent Cleaning	Facility's parts washers (degreasers) do not use any solvents that contain chemicals subject to this regulation in concentrations subject to this regulation.
Fuel Storage Tanks	06-096 C.M.R. ch. 170	Degassing of Petroleum Storage Tanks, Marine Vessels, and Transport Vessels	Gasoline Storage Tank's capacity is less than 39,000 gallons. Distillate Fuel Storage Tank and #6 Fuel Oil Storage Tank do not contain affected product as defined in 06-096 C.M.R. ch. 170.
	06-096 C.M.R. ch. 171	Control of Petroleum Storage Facilities	Storage Tanks are not located at a petroleum storage facility as defined in 06-096 C.M.R. ch. 171.
Proof Presses	40 C.F.R. Part 63, Subpart KK	NESHAP for the Printing and Publishing Industry	Proof presses, as the one Twin Rivers operates, are exempt.
	06-096 C.M.R. ch. 132	Graphic Arts – Rotogravure and Flexography	Facility's proof press is operated in the lab and used for quality control purposes. The proof press does not meet the definition of a printing press (continuous substrate or sheet).

Source	Citation	Description	Basis for Determination
Facility	40 C.F.R. Part 64	Compliance Assurance Monitoring	None of the units at the facility meet all three applicability criteria.
	40 C.F.R. Part 60, Subpart BB	Standards of Performance for Kraft Pulp Mills	Facility does not include a kraft pulp mill.
	40 C.F.R. Part 60, Subpart BBa	Standards of Performance for Kraft Pulp Mill Affected Sources for which Construction, Reconstruction, or Modification Commenced after May 23, 2013	Facility does not include a kraft pulp mill.
	40 C.F.R. Part 63, Subpart S	NESHAP from the Pulp and Paper Industry	Facility is not a major source of HAP and does not use the processes and materials listed in 40 C.F.R. § 63.440(a).
	40 C.F.R. Part 63, Subpart JJJJ	NESHAP: Paper and Other Web Coating	Facility is not a major source of HAP.
	40 C.F.R. Part 82, Subpart E	The Labeling of Products Using Ozone-Depleting Substances	Facility does not use substances subject to the regulation.
Facility	06-096 C.M.R. ch. 107	Sulfur Dioxide Emission Standards for Sulfite Pulp Mills	Sulfite pulp mill is located in Edmundston, New Brunswick, Canada and is therefore not part of this facility.
	06-096 C.M.R. ch. 111	Petroleum Liquid Storage Vapor Control	Facility does not have tanks that are subject to this regulation.
	06-096 C.M.R. ch. 124	Total Reduced Sulfur Control from Kraft Pulp Mills	Facility does not include a kraft pulp mill.
	06-096 C.M.R. ch. 129	Surface Coating Facility	Facility does not own, operate, or participate in any activities that would be subject to this regulation.
	06-096 C.M.R. ch. 134	VOC RACT	Boilers, paper machines, and online and off-line coaters and dryers are exempt from this rule. Potential to emit VOC from the remaining equipment is less than 40 tpy.

[06-096 C.M.R. ch. 140]

(7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of three or more years. However, no opening is required if the effective date of the requirement is later than the date on

which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to 06-096 C.M.R. ch. 140;

B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or

D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[06-096 C.M.R. ch. 140]

(8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading, and other similar programs or processes for changes that are provided for in the Part 70 license. [06-096 C.M.R. ch. 140]

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 and this license (38 M.R.S. § 347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in 06-096 C.M.R. ch. 140. [06-096 C.M.R. ch. 140]

(3) 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. 140] **Enforceable by State-only**

(4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to 38 M.R.S. § 353-A.

(5) The licensee shall maintain and operate all emission units and air pollution control 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. 140]
Enforceable by State-only

(6) 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. In addition, the licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license. [06-096 C.M.R. ch. 140]

(7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, 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 the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [06-096 C.M.R. ch. 140]

(8) 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 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;

2. To demonstrate compliance with the applicable emission standards; or

3. 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. 140] **Enforceable by State-only**

(9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

A. Within thirty (30) days following receipt of such test results, 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. 140] **Enforceable by State-only**

(10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 M.R.S. § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design, or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

C. All other deviations shall be reported to the Department in the facility's semiannual report.

[06-096 C.M.R. ch. 140]

(11) Upon the written request of 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 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. 140]

(12) The licensee shall submit semiannual reports of any required periodic monitoring by January 31 and July 31 of each year, or on an equivalent schedule specified in the license. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [06-096 C.M.R. ch. 140]

(13) The licensee shall submit a compliance certification to the Department and EPA annually by January 31 of each year, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:

A. The identification of each term or condition of the Part 70 license that is the basis of the certification;

B. The compliance status;

C. Whether compliance was continuous or intermittent;

D. The method(s) used for determining the compliance status of the source, currently and over the reporting period; and

E. Such other facts as the Department may require to determine the compliance status of the source.

[06-096 C.M.R. ch. 140]

SPECIFIC CONDITIONS

(14) **Facility-Wide HAP Limit**

Facility-wide HAP emissions shall not exceed 9.9 tons/year for a single HAP and 24.9 tons/year for total HAPs, on a 12-month rolling total basis. To demonstrate compliance with these limits, Twin Rivers shall maintain and make available upon request a current list of all HAP-containing materials in use at the facility. This list shall provide the necessary data to determine compliance, including:

- Names and types of all HAP-containing materials in use;
- Identification of each HAP in these materials;
- Percent HAP by weight or pounds of HAP per gallon for each material;
- The quantity of HAP-containing materials purchased on a monthly basis; and
- The quantity of HAP-containing materials shipped offsite on a monthly basis.

All HAP in these materials is assumed to be released into the atmosphere. Monthly HAP totals shall be determined using the following equation:

$$\text{Monthly HAP Emissions} = \sum_{i=1}^{n} (\text{A x HAP content}) - (\text{B x HAP Content})$$

Where:

i = each HAP containing material used at the facility during the month
n = the number of HAP containing materials used at the facility during the month
A = monthly facility usage of HAP containing materials
B = Quantities of HAP containing materials shipped offsite

Twin Rivers may elect to not include material shipped offsite, which will result in a conservatively high estimate of HAP emissions.

The monthly totals of HAPs shall be used to calculate and track HAP emissions on a 12-month rolling total basis. Twin Rivers shall make these records available to the Department upon request.

(15) **Boiler #6 – 240 MMBtu/hr**

A. Fuels

1. Boiler #6 is licensed to fire #6 fuel oil, specification waste oil (as defined in 06-096 C.M.R. ch. 860), and distillate fuel for startup of the boiler. [06-096 C.M.R. ch. 140, BPT and 06-096 C.M.R. ch. 860]

2. Total fuel fired in Boiler #6 shall not exceed 2,800,000 gallons/year on a 12-month rolling total basis. 06-096 C.M.R. ch. 140, BPT]

3. Twin Rivers shall maintain records of the quantity of fuel consumed on a monthly and 12-month rolling total basis. [06-096 C.M.R. ch. 140, BPT]

B. Fuel Sulfur Content

1. Residual Fuel (#6 fuel oil)
The residual fuel fired at the facility shall have a maximum sulfur content of 0.5% by weight. [38 M.R.S. §§ 603-A(2)(A)(1) and (2)]

2. Distillate Fuel
The facility shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm).
[38 M.R.S. § 603-A(2)(A)(3)(a)]

3. Sulfur Content Compliance
Sulfur content compliance shall be demonstrated by fuel records showing the quantity, type, and the percent sulfur of the fuel delivered or fuel used. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier, certificate of analysis, or testing of fuel in the tank on-site. [06-096 C.M.R. ch. 140, BPT]

C. Emission Limits

Emission limits are on a 1-hour block average basis unless otherwise stated.

1. Emissions from Boiler #6 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	06-096 C.M.R. ch. 103, § 2(A)(1)	Enforceable by State-only
NO_x	0.40	A-263-71-E-A (4/16/96), NO_x RACT	Enforceable by State-only

2. missions from Boiler #6 shall not exceed the following limits:

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	48.0	A-263-71-B-R (6/9/1998), BPT	Enforceable by State-only
PM_{10}	48.0	A-263-71-B-R (6/9/1998), BPT	Enforceable by State-only
$PM_{2.5}$	48.0	06-096 C.M.R. ch. 140, BPT	Enforceable by State-only
SO_2	126.08 (based on 0.5% S limit by weight)	38 M.R.S. §§ 603-A(2)(A)	Enforceable by State-only
NO_x	96.0	A-263-71-B-R (6/9/1998), BPT	Enforceable by State-only
CO	8.0	A-263-71-B-R (6/9/98), BPT	Enforceable by State-only
VOC	1.2	A-263-71-E-R/A (7/18/2014), BPT	Enforceable by State-only

D. Visible Emissions

Visible emissions from Boiler #6 shall not exceed 20% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time the owner or operator must meet the normal operating visible emissions standard or the following alternative visible emissions standards.

During periods of startup, shutdown, or malfunction, visible emissions shall not exceed 30% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than one hour (10 consecutive six-minute block averages) per event. Twin Rivers shall keep records sufficient to document the date, time, and duration of each event. These records shall be maintained for at least six years and provided to the Department upon request

[06-096 C.M.R. ch. 101, §§ 4(A)(1)(a) and 6]

E. Compliance Methods

Compliance with the emission limits associated with Boiler #6 shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department. [06-096 C.M.R. ch. 140, BPT]

Pollutant	Emission Limit	Compliance Method	Frequency
PM	lb/MMBtu lb/hr	40 C.F.R. Part 60, App. A, Method 5	As requested
PM_{10}	lb/hr	40 C.F.R. Part 60, App A, Method 5, or EPA Test Methods 201 or 201A and 202	As requested
$PM_{2.5}$	lb/hr	40 C.F.R. Part 60, App A, Method 5, or EPA Test Methods 201 or 201A and 202	As requested

Pollutant	Emission Limit	Compliance Method	Frequency
SO_2	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO_x	lb/MMBtu	40 C.F.R. Part 60, App. A, Method 7	As requested
	lb/hr		
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested
VOC	lb/hr	40 C.F.R. Part 60, App. A, Method 25 or 25A	As requested
Visible Emissions	% opacity	40 C.F.R. Part 60, App. A, Method 9	As requested

F. Periodic Monitoring

Twin Rivers shall monitor and record data values for Boiler #6 as indicated in the following table whenever the unit is operating. [06-096 C.M.R. ch. 140, BPT]

Boiler #6			
Parameter	**Units of Measure**	**Monitoring Tool/Method**	**Frequency**
#6 fuel oil use	Gallons	Tank fuel level marker/meter/gauge and calculations	Monthly and 12-month rolling total
#2 fuel oil use	Gallons	Fuel flow meter	Monthly and 12-month rolling total

G. 40 C.F.R. Part 63, Subpart JJJJJJ

The applicable, ongoing requirements of Subpart JJJJJJ for Boiler #6 are the following:

1. Compliance Dates, Notifications, and Work Practice Requirements

   a. Boiler Tune-Up Program

      (i) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]
      (ii) Each tune-up shall be conducted every two 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:
      - 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, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]
      - 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)]

- 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, not to exceed 36 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]
- Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
- 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)]
- 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:

- 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;
- A description of any corrective actions taken as part of the tune-up of the boiler; and
- The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

b. Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years. 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:

- "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."
- "No secondary materials that are solid waste were combusted in any affected unit."
- "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."

2. Recordkeeping

a. 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.

b. 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 (6) 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.

EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [40 C.F.R. § 63.11225(a)(4)(vi)]

(16) **Diesel Generator, IT Backup Generator and Diesel Fire Pumps #1 and #2**

A. The Diesel Generator, the IT Backup Generator, and Diesel Fire Pumps #1 and #2 are licensed to fire distillate fuel. [06-096-C.M.R. ch. 140, BPT]

B. Fuel Sulfur Content

1. The fuel oil sulfur content for the Diesel Generator, the IT Backup Generator, and Diesel Fire Pumps #1 and #2 shall be limited to 0.0015% sulfur by weight. [06-096 C.M.R. ch. 140, BPT]

2. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier, fuel supplier certification, certificate of analysis, or testing of fuel in the tank on-site. [06-096 C.M.R. ch. 140, BPT]

C. Emissions shall not exceed the following limits [A-263-70-C-R (1/20/2010), BPT for PM and PM_{10} values and 06-096 C.M.R. ch. 140, BPT for $PM_{2.5}$ values]:

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)**
Diesel Generator	0.07	0.07	0.07	0.001	2.65	0.57	0.22
IT Backup Generator	0.07	0.07	0.07	0.001	2.60	0.56	0.21
Diesel Fire Pump #1	0.26	0.26	0.26	0.003	9.70	2.09	0.79
Diesel Fire Pump #2	0.22	0.22	0.22	0.003	7.94	1.71	0.65

D. Visible Emissions

Diesel Generator and Diesel Fire Pumps #1 and #2
The Diesel Generator and Diesel Fire Pumps #1 and #2 are each subject to the following visible emissions standard of 06-096 C.M.R. ch. 101.

Visible emissions from the Diesel Generator and Diesel Fire Pumps #1 and #2 shall each not exceed an opacity of 20% on a six-minute block average basis, except during periods of startup. During periods of startup, each engine must meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard. Use of the following work practice standards and alternative visible emissions standard in lieu of the normal operating visible emissions standard is limited to no more than once per day.

1. The duration of each startup shall not exceed 30 minutes per event;

2. Visible emissions during startup shall not exceed 50% opacity on a six-minute block average basis; and

3. Twin Rivers shall keep records of the date, time, and duration of each startup event.

Note: This does not limit any engine to one startup per day. It only limits the use of the alternative emission standard to once per day for each engine.
[06-096 C.M.R. ch. 101 §4(A)(4)]

IT Backup Generator
Visible emissions from the IT Backup Generator shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101 § 4(A)(4)]

E. The IT Backup Generator shall meet the applicable requirements of 40 C.F.R. Part 60, Subpart IIII, including the following: [incorporated under 06-096 C.M.R. ch. 115, BACT and 06-096 C.M.R. ch.169]

1. Manufacturer Certification
   The engine shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in § 60.4202. [40 C.F.R. § 60.4205(b)]

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, BACT]

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 60.4209(a)]

4. Annual Time Limit for Maintenance and Testing

   a. As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written log) of all engine operating hours. [40 C.F.R. § 60.4211(f) and 06-096 C.M.R. ch. 115, BACT]

   b. Twin Rivers shall keep records that include the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 60.4214(b)]

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

   Twin Rivers 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, BACT]

F. Diesel Generator and Diesel Fire Pumps #1 and #2 **shall meet the applicable** requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following:

1. Twin Rivers shall meet the following operational limitations for each of the compression ignition emergency engines (Diesel Generator and Diesel Fire Pumps #1 and #2):

   a. Change the oil and filter every 500 hours of operation or annually, whichever comes first;
   b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
   c. Inspect the hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

   Records shall be maintained documenting compliance with the operational limitations.

   [40 C.F.R. § 63.6603(a) and Table 2(d); and 06-096 C.M.R. ch. 140, BPT]

2. Oil Analysis Program Option
   Twin Rivers has the option of utilizing an oil analysis program which complies with the requirements of § 63.6625(i) in order to extend the specified oil change requirement. If this option is used, Twin Rivers must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 C.F.R.§ 63.6625(i)]

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 63.6625(f)]

4. Maintenance, Testing, and Non-Emergency Operating Situations

   a. The engines shall each be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written logs) of all engine operating hours. [40 C.F.R. § 63.6640(f) and 06-096 C.M.R. ch. 140, BPT]

   b. Twin Rivers shall keep records that include maintenance conducted on the engines and the hours of operation of each engine recorded through the non-resettable hour meter. Documentation shall include the number of hours each unit operated for emergency purposes, the number of hours each unit operated for non-emergency purposes, and the reason each engine was in operation during each time. [40 C.F.R. §§ 63.6655(e) and (f)]

5. Operation and Maintenance
   The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or Twin Rivers shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

6. Startup Idle and Startup Time Minimization
   During periods of startup the facility must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 C.F.R. § 63.6625(h) & 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(17) **Paper Machines, Size Presses, and Online and Off-Line Coaters**

A. The VOC emissions from all paper coatings and additives used at the facility shall be 130.0 ton/yr, including a VOC emission limit from the Paper Machine Source Group of 78.0 tons/year.

B. PM #7 Online Coater and C-2 Off-line Coater shall run with only aqueous based coatings. The VOC content of the coating shall remain below 2.9 lb VOC/gallon. [06-096 C.M.R. ch. 123 & A-263-70-A-I (6/28/02), BPT]

C. Twin Rivers shall maintain the following records on site for all coatings and additives used at the facility on a monthly and 12-month rolling total basis [06-096 C.M.R. ch. 123 & A263-70-A-I (6/28/02), BPT]:

1. Amount of VOC containing chemicals (in lb VOC/gallon, less water) in applied coatings;

2. Volume (in gallons) of coating applied each month; and

3. Total VOC emitted from coatings and additives on a monthly and 12-month rolling total basis.

4. Certification stating all coatings used at the facility are below 2.9 lb VOC/gallon, excluding water and negligibly reactive VOC compounds.

D. Visible Emissions

Visible emissions from the Paper Machine Source Group, the Paper Machine #7 Online Coater, and the C-2 Off Machine Coater shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101 § 4(B)(4)]

(18) **Propane-Fired Dryers (PD #1, #2, #3, #4, #5, #6, #11, #12, and #13)**

A. Fuels

1. The Propane-fired Dryers are licensed to fire propane. [06-096 C.M.R. ch. 140, BPT]

2. Twin Rivers shall be limited to 3,000,000 gal/yr of propane on a 12-month rolling total basis for all Propane-fired Dryers.

3. Twin Rivers shall maintain records of the quantity of fuel consumed on a monthly and 12-month rolling total basis. [06-096 C.M.R. ch. 140, BPT]

B. Emission Limits

1. The BPT Emission Limits for the Propane-fired Dryers are the following: [06-096 C.M.R. ch. 140, BPT]

Unit	Pollutant	lb/MMBtu
PD #1	PM	0.05
PD #2	PM	0.05
PD #3	PM	0.05
PD #4	PM	0.05

Unit	Pollutant	lb/MMBtu
PD #5	PM	0.05
PD #6	PM	0.05
PD #11	PM	0.05
PD #12	PM	0.05
PD #13	PM	0.05

2. The BPT Emission Limits for the Propane-fired Dryers are the following: [06-096 C.M.R. ch. 140, 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)
PD #1	0.25	0.25	0.25	0.001	0.71	0.41	0.05
PD #2	0.25	0.25	0.25	0.001	0.71	0.41	0.05
PD #3	0.25	0.25	0.25	0.001	0.71	0.41	0.05
PD #4	0.25	0.25	0.25	0.001	0.71	0.41	0.05
PD #5	0.35	0.35	0.35	0.001	0.99	0.57	0.08
PD #6	0.35	0.35	0.35	0.001	0.99	0.57	0.08
PD #11	0.15	0.15	0.15	0.001	0.43	0.25	0.03
PD #12	0.31	0.31	0.31	0.001	0.88	0.51	0.07
PD #13	0.31	0.31	0.31	0.001	0.88	0.51	0.07

C. Visible Emissions

Visible emissions from each Propane-fired Dryer shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101 § 4(A)(3)]

D. Compliance Methods

Compliance with the emission limits associated with the Propane-fired Dryers shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department. [06-096 C.M.R. ch. 140, BPT]

Pollutant	Applicable Emission Limit	Compliance Method	Frequency
PM	lb/MMBtu lb/hr	40 C.F.R. Part 60, App. A, Method 5	As requested
PM_{10}	lb/hr	40 C.F.R. Part 60, App. A Method 5 or EPA Test Method 201 or 201A and 202	As requested
$PM_{2.5}$	lb/hr	40 C.F.R. Part 60, App. A, Method 5, or	As requested

Pollutant	Applicable Emission Limit	Compliance Method	Frequency
		EPA Test Method 201 or 201A and 202	
SO_2	lb/hr	40 C.F.R. Part 60, App. A, Method 6	As requested
NO_x	lb/hr	40 C.F.R. Part 60, App. A, Method 7	As requested
CO	lb/hr	40 C.F.R. Part 60, App. A, Method 10	As requested
VOC	lb/hr	49 C.F.R. Part 60, App. A, Method 25 or 25A	As requested
Visible Emissions	Percent opacity on a six-minute block average basis	40 C.F.R. Part 60, App. A, Method 9	As requested

(19) **Storage Silos TK13854, TK13855, and TK13856**

A. Control Equipment and Maintenance

Twin Rivers shall operate and maintain baghouses on Storage Silos TK13854, TK13855, and TK 13856 to control particulate matter emissions generated during the loading and unloading of the storage silos. In order to document maintenance of the baghouses, Twin Rivers shall keep a maintenance log recording the date of all bag failures and routine baghouse inspections and maintenance.
[A-263-77-1-A (1/27/2017), BACT]

B. Visible Emissions

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

(20) **Parts Washers**

The Parts Washers at Twin Rivers are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130.

A. Twin Rivers shall keep records of the amount of solvent added to each parts washer. [06-096 C.M.R. ch. 140, BPT]

B. The following are exempt from the requirements of 06-096 C.M.R. ch. 130 [06-096 C.M.R. ch. 130]:

1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);

2. Wipe cleaning; and,

3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.

C. The following standards apply to cold cleaning machines that are subject to 06-096 C.M.R. ch. 130.

1. Twin Rivers shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 C.M.R. ch. 130]:

   a. Waste solvent shall be collected and stored in closed containers.
   b. Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
   c. Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized, or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
   d. The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
   e. Sponges, fabric, wood, leather, paper products, and other absorbent materials shall not be cleaned in the parts washer.
   f. When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
   g. Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
   h. Work area fans shall not blow across the opening of the washer unit.
   i. The solvent level shall not exceed the fill line.

2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches.

3. Each parts washer shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent [06-096 C.M.R. ch. 130]

(21) **Gasoline Storage Tank**

A. 40 C.F.R. Part 63, Subpart CCCCCC

The applicable requirements of Subpart CCCCCC for the Gasoline Storage Tank are the following:

1. Twin Rivers shall, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 C.F.R. § 63.11115(a)]

2. Twin Rivers shall keep applicable records and submit reports as specified in § 63.11125(d) and § 63.11126(b). [40 C.F.R. § 63.11115(b)]

3. Twin Rivers shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [40 C.F.R. §63.11116(a)]

    a. Minimize gasoline spills;
    b. Clean up spills as expeditiously as practicable;
    c. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
    d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

4. Twin Rivers shall have records available within 24 hours of a request by the Department to document the gasoline throughput of the Gasoline Storage Tank. [40 C.F.R §63.11116(b)]

B. Gasoline Dispensing Facilities Vapor Control 06-096 C.M.R. ch. 118

1. The fill pipe must extend within six inches of the bottom of the gasoline storage tank. [06-096 C.M.R. ch. 118, § 4(A)]

2. Twin Rivers shall maintain records of the monthly and annual throughput of gasoline. and shall notify the Department of its applicability within 30 days if the monthly or annual throughput of the Gasoline Storage Tank ever exceeds the initial applicability threshold. These records shall be maintained for a minimum of three years, shall be available for inspection during normal business hours, and shall be provided to the Department and/or EPA upon request. [06-096 C.M.R. ch. 118, § 10(B)] Note: Standard Condition (6) of this license requires all records be retained for six years; therefore, the three-year record retention requirement of 06-096 C.M.R. ch. 118 shall be streamlined to the more stringent six-year requirement.

(22) **General Process Emissions**

Visible emissions from any general process source shall not exceed 20% on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(4)]

(23) **Fugitive Emissions**

A. Twin Rivers 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. Twin Rivers 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)]

(24) **Semiannual Reporting** [06-096 C.M.R. ch. 140]

Note: This semiannual report is separate from, and in addition to, any semiannual report required by specific NSPS or NESHAP regulations.

A. The licensee shall submit to the Department semiannual reports which are due on **January 31st** and **July 31st** of each year. The facility's designated responsible official must sign this report.

B. The semiannual report shall be considered on-time if the postmark of the submittal is on or before the due date or if the report is received by the Department within seven calendar days of the due date.

C. Each semiannual report shall include a summary of the periodic monitoring required by this license.

D. Each semiannual report shall include the annual capacity factor of Boiler #6 for each fuel.

E. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

(25) **Annual Compliance Certification**

Twin Rivers shall submit an annual compliance certification to the Department and EPA in accordance with Standard Condition (13) of this license. The annual compliance certification is due **January 31st** of each year. The facility's designated responsible official must sign this report.

The annual compliance certification shall be considered on-time if the postmark of the submittal is on or before the due date or if the report is received by the Department within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [06-096 C.M.R. ch. 140]

(26) **Annual Emission Statements**

A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, Twin Rivers shall annually report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory. The emission statement shall be submitted as specified by the date in 06-096 C.M.R. ch. 137.

B. Twin Rivers shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:

1. The amount of #6 fuel oil fired in Boiler #6 on a monthly basis;

2. The amount of distillate fuel fired in Boiler #6, the Diesel Generator. the IT Backup Generator, and Diesel Fire Pumps #1 and #2 (each) on a monthly basis;

3. The amount of propane fired in the Propane-fired Dryers on a monthly basis;
4. The sulfur content of #6 fuel oil fired in Boiler #6 and the distillate fuel fired in Boiler #6, the Diesel Generator and Diesel Fire Pumps #1 and #2 on a monthly basis;

5. Calculations of the VOC and HAP emissions from the Paper Machine Source Group (including all associated size presses and online coaters) and the C-2 Off-Machine Coater on a calendar year total basis; and

6. Hours each emission unit was active or operating on a monthly basis.

[06-096 C.M.R. ch. 137]

C. Twin Rivers shall report to the Department emissions of hazardous air pollutants as required by 06 096 C.M.R. ch. 137, § (3)(C). Twin Rivers shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3). [38 M.R.S. § 353-A (1-A)]

(27) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

Origin and Authority	Requirement Summary	Enforceability
06-096 C.M.R. ch. 102	Open Burning	-
06-096 C.M.R. ch. 109	Emergency Episode Regulations	-
06-096 C.M.R. ch. 110	Ambient Air Quality Standards	-
06-096 C.M.R. ch. 116	Prohibited Dispersion Techniques	-
38 M.R.S. § 585-B, §§5	Mercury Emission Limit	Enforceable by State-only

(28) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. Examples of such units include refrigerators and any size air conditioners that contain CFCs. [40 C.F.R. Part 82, Subpart F]

(29) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Twin Rivers shall comply with the *Standard for Asbestos Demolition and Renovation,* 40 C.F.R. Part 61, Subpart M.

(30) **Expiration of a Part 70 License**

A. Twin Rivers shall submit a complete Part 70 renewal application at least six but no more than 18 months prior to the expiration of this air license.

B. Pursuant to Title 5 M.R.S. §10002, and 06-096 C.M.R. ch. 140, the Part 70 license shall not expire, and all terms and conditions shall remain in effect until the Department takes final action on the renewal application of the Part 70 license. An existing source submitting a complete renewal application under 06-096 C.M.R. ch. 140 prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license. **Enforceable by State-only**

(31) **New Source Review**

Twin Rivers is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emission license, and the NSR requirements remain in effect even if this 06-096 C.M.R. ch. 140 Air Emissions License, A-263-70-G-R/A, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 30th DAY OF DECEMBER, 2024.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____ for _____
MELANIE LOYZIM, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

[Note: If a complete renewal application, as determined by the Department, is submitted at least six but no more than 18 months prior to expiration of the facility's Part 70 license, then pursuant to Title 5 M.R.S. §10002, all terms and conditions of the Part 70 license shall remain in effect until the Department takes final action on the Part 70 license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: February 13, 2023
Date of application acceptance: February 13, 2023

Date filed with the Board of Environmental Protection:

This Order prepared by Kendra Nash, Bureau of Air Quality.