

**Mainly Environmental LLC**  
Air, Energy & Environmental Consulting

August 14, 2020

**Electronic Mail to Board Service List Only**

Presiding Officer Duchesne and Board Members  
Maine Board of Environmental Protection  
17 State House Station  
28 Tyson Drive  
Augusta, Maine 04333-0017

**RE: Comments on the Department's Draft Air Emissions License A-1146-71-A-N, Dated July 17, 2020**

Dear Presiding Officer Duchesne and Board of Environmental Protection:

On July 17, 2020, the Board of Environmental Protection (BEP) released a Department of Environmental Protection (DEP) Staff Recommendation/Draft Board Order (Draft Air License A-1146-71-A-N) regarding Nordic Aquafarms' Air Emissions License Application. The recommendation is in the form of a Draft Air Emissions License. Provided in this letter are comments on the Draft Air Emissions License.

**Draft Condition 17(D) - Generator Opacity**

D. Visible Emissions

Visible emissions from each of the generators shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BACT]

Nordic Aquafarms asks that that the following language be added to this Condition as per the standard language in 06-096 C.M.R. ch. 101:

“During periods of startup, the unit operator of a reciprocating engine may elect to comply with the work practice standards in lieu of this visible emission standard.

- (1) The unit operator shall maintain a log (written or electronic) of the date, time, and duration of all unit startups which result in the operator electing to comply with this section.
- (2) The unit shall be operated in accordance with the manufacturer's emission-related operating instructions.
- (3) The unit operator shall 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, after which time the non-startup emission limitations shall apply.
- (4) The unit, including any associated air pollution control equipment, shall be operated at all times 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 that 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 unit. “

**Draft Condition 17(E) – (Stack Testing Requirement)**

- E. To demonstrate compliance with the licensed emission limits, Nordic shall conduct an initial performance test on the first generator commissioned for service. The testing shall include PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, and CO, and shall take place within 90 days or 200 hours of runtime after the first startup, whichever comes later. Results of the testing shall be submitted to the Department within 60 days of the test completion date.

The engine manufacturer is already required to provide a certification of compliance with the emission standards as written in Condition 17(F)(1). The manufacturer tests representative engines that it manufactures and supplies a certificate of compliance with each engine delivered. Accordingly, Nordic Aquafarms asks that DEP consider amending the license language for these newly supplied certified engines as follows:

“Stack testing of a representative generator for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, and CO may be required by the Department upon request. Testing shall be completed within 90 days of the request with results of the testing submitted to the Department within 60 days of the test completion date.”

This will allow DEP to require testing at any time, as it sees fit, but would not necessarily require testing of newly installed and certified compliant equipment during the commissioning phase of its facilities.

**Proposed License Condition – (Operation of a Maximum of Seven Engines Simultaneously)**

Nordic Aquafarms’ original application and DEP’s modeling was based on only seven engines running simultaneously. The Findings of Fact in the draft license mentions multiple times that only seven of the eight engines may operate simultaneously, however, such a condition is not included in the Order.

Proposed license condition:

“Nordic Aquafarms shall only operate a maximum of seven of the eight engines simultaneously.”

Thank you for considering our comments and we appreciate the hard work that the BEP and DEP has put into preparing these findings.

Sincerely,

Mainly Environmental LLC

A handwritten signature in blue ink, appearing to read "Steven Whipple".

Steven Whipple, P.E.

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