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

MSAD #20 **Aroostook County** **Fort Fairfield, Maine** **A-1063-71-C-R/A**	| | | |	**Departmental** **Findings of Fact and Order** **Air Emission License** **Renewal and** **After-the-Fact Amendment**

Findings of Fact

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

I. Registration

A. Introduction

MSAD #20 has applied to renew their Air Emission License for the operation of emission sources associated with their educational facility.

The equipment addressed in this license is located at 28 High School Drive, Fort Fairfield, Maine.

MSAD #20 has requested an after-the-fact amendment to their license in order to make the following changes:

1. Remove resinated wood chips as a fuel for Boiler #3;
2. Remove Generator #1 from the license; and
3. After-the-fact replacement of Boilers #1 and #2 with newer units.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Max. Capacity	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Boiler #1 [A]	4.48 MMBtu/hr [B]	32 gal/hr	Distillate Fuel	2025	2025	1
Boiler #1 [A]	4.48 MMBtu/hr [B]	49 gal/hr	Propane	2025	2025	1
Boiler #2 [A]	4.48 MMBtu/hr [B]	32 gal/hr	Distillate Fuel	2025	2025	1
Boiler #2 [A]	4.48 MMBtu/hr [B]	49 gal/hr	Propane	2025	2025	1
Boiler #3	3.01 MMBtu/hr	719 lbs/hr	Biomass	2011	2011	2

Equipment	Max. Capacity	Maximum Firing Rate	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Boiler #4	2.84 MMBtu/hr [B]	20.25 gal/hr	Distillate Fuel	1991	1991	3
Boiler #5	2.84 MMBtu/hr [B]	20.25 gal/hr	Distillate Fuel	1991	1991	3
Boiler #1 [C]	*3.1 MMBtu/hr*	*22.1 gal/hr*	*Distillate Fuel*	*1993*	*1993*	*1*
Boiler #2 [C]	*3.1 MMBtu/hr*	*22.1 gal/hr*	*Distillate Fuel*	*1997*	*1997*	*1*

[A] New to license
[B] Maximum heat input capacity based on Distillate Fuel firing rate
[C] Removed from license

Stationary Engine

Equipment	Max. Input Capacity	Fuel Type	Firing Rate	Date of Manuf.	Date of Install.
Generator #1 [A]	*0.73 MMBtu/hr*	*Distillate Fuel*	*5.3 gal/hr*	*1981*	*2003*

[A] Removed from license

C. Definitions

Biomass means any biomass-based solid fuel that is not a solid waste. This includes, but is not limited to, wood residue and wood products (*e.g.,* trees, tree stumps, tree limbs, bark, lumber, sawdust, sander dust, chips, scraps, slabs, millings, and shavings). This definition also includes wood chips and processed pellets made from wood or other forest residues. Inclusion in this definition does not constitute a determination that the material is not considered a solid waste. MSAD #20 should consult with the Department before adding any new biomass type to its fuel mix.

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.

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

Resinated wood, for the purposes of this license, means wood products (containing binders and adhesives) produced by primary and secondary wood products manufacturing. Resinated wood includes residues from the manufacture

of and use of resinated wood, including materials such as board trim, sander dust, panel trim, and off-specification resinated wood products that do not meet a manufacturing quality or standard.

D. Application Classification

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

MSAD #20 has applied to renew currently licensed emission units as well as modify their license as addressed in Section I(A) above.

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the "Significant Emissions" levels as defined in the Department's *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100. The emission increases are determined by subtracting the current licensed annual emissions preceding the modification from the maximum future licensed annual emissions, as follows:

Pollutant	Current License (tpy)	Future License (tpy)	Net Change (tpy)	Significant Emissions Levels
PM	8.8	9.5	+0.7	100
PM_{10}	8.8	9.5	+0.7	100
$PM_{2.5}$	-	9.5	-	100
SO_2	22.7	0.4	-22.3 [A]	100
NO_x	16.5	15.9	-0.6	100
CO	9.9	11.9	+2.0	100
VOC	0.4	0.7	+0.3	100

[A] SO_2 emissions greatly decreased due to lower maximum distillate fuel sulfur content included in state statute since the previous license renewal and removal of several distillate boilers from the license.

Therefore, this license is considered to be both a renewal and a minor modification and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules C.M.R. ch. 115.

E. Facility Classification

The facility is licensed as follows:

- As a natural minor source of criteria pollutants, because no license restrictions are necessary to keep facility emissions below major source thresholds for criteria pollutants; and

· As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

II. Best Practical Treatment (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

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. Boilers #1, #2, #4, and #5

MSAD #20 operates Boilers #1 and #2 for building heating. Boilers #1 and #2 are each rated at 4.48 MMBtu/hr and fire distillate fuel with propane available as a backup fuel. The boilers were installed in 2025 and exhaust through a common stack, Stack #1.

MSAD #20 operates Boilers #4 and #5 for building heating. Boilers #4 and #5 are each rated at 2.84 MMBtu/hr and fire distillate fuel. The boilers were installed in 1991 and exhaust through a common stack, Stack #3.

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 in Boilers #1, #2, #4, and #5 shall not exceed 0.0015% by weight (15 ppm).

1. BACT Findings

MSAD #20 submitted a BACT analysis for control of emissions from Boilers #1 and #2. The following is a summary of the BACT analysis.

a. Particulate Matter (PM, PM_{10}, $PM_{2.5}$)
MSAD #20 has proposed to burn only low-ash content fuels (distillate fuel and propane) in the boilers and to optimize combustion conditions by utilizing oxygen trim systems on the boilers and following the manufacturer's recommendations. Additional add-on pollution controls are not economically feasible.

BACT for PM/PM_{10}/$PM_{2.5}$ emissions from Boilers #1 and #2 is the use of an oxygen trim system and the emission limits listed in the tables below.

b. Sulfur Dioxide (SO_2)
MSAD #20 has proposed to fire only distillate fuel with a sulfur content not to exceed 0.0015% by weight and propane. The use of these fuels results in minimal emissions of SO_2, and additional add-on pollution controls are not economically feasible.

BACT for SO_2 emissions from Boilers #1 and #2 is the use of ultra-low-sulfur distillate fuel and propane and the emission limits listed in the tables below.

c. Nitrogen Oxides (NO_x)
MSAD #20 considered several control strategies for the control of NO_x including Selective Catalytic Reduction (SCR), Selective Non-Catalytic Reduction (SNCR), water/steam injection, flue gas recirculation (FGR), low-NO_x burners, and use of oxygen trim systems.

Both SCR and SNCR are technically feasible control technologies for minimizing NO_x. Both methods include injection of a NO_x reducing agent, typically ammonia or urea, into the boiler combustion gases, where the reagent reacts with NO_x to form nitrogen and water. Each technology is effective within a specific temperature range, 500 – 1,200 °F for SCR and 1,400 – 1,600 °F for SNCR. However, both SCR and SNCR have the negative environmental impact of emissions of unreacted ammonia. In addition, due to the initial capital cost and the annual operating costs, these systems are typically only considered cost effective for units larger than Boilers #1 and #2.

Water/steam injection and FGR can attain similar NO_x reduction efficiencies through lowering burner flame temperature and thereby reducing thermal

NO_x formation. However, both control strategies reduce the boiler's fuel efficiency.

The use of FGR on Boilers #1 and #2 as well as low-NO_x burners are prohibitively expensive for units of this size and anticipated annual pollutant emissions.

The boilers were installed with Autoflame combustion control systems to provide oxygen trim control.

BACT for NO_x emissions from Boilers #1 and #2 is the use of good combustion practices, the use of the Autoflame oxygen trim control, and the emission limits listed in the tables below.

d. Carbon Monoxide (CO) and Volatile Organic Compounds (VOC)
MSAD #20 considered several control strategies for the control of CO and VOC including oxidation catalysts, thermal oxidizers, and combustion tuning and maintenance.

Oxidation catalysts and thermal oxidizers both have high capital, maintenance, and operational costs considering the size of the boiler in question. These controls were determined to be economically infeasible.

BACT for CO and VOC emissions from Boilers #1 and #2 is maintaining an optimum air-to-fuel ratio (using oxygen trim control) and the emission limits listed in the tables below.

e. Emission Limits
The BACT emission limits for Boilers #1 and #2 were based on the following:

Distillate Fuel

$PM/PM_{10}/PM_{2.5}$	– 0.08 lb/MMBtu, 06-096 C.M.R. ch. 115, BACT
SO_2	– based on firing distillate fuel with a maximum sulfur content of 0.0015% by weight
NO_x	– 20 lb/1,000 gal from AP-42 Table 1.3-1 dated 5/10
CO	– 5 lb/1,000 gal from AP-42 Table 1.3-1 dated 5/10
VOC	– 0.34 lb/1,000 gal from AP-42 Table 1.3-3 dated 5/10
Visible Emissions	– 06-096 C.M.R. ch. 101

Propane/LPG

PM	– 0.05 lb/MMBtu, 06-096 C.M.R. ch. 115, BACT
SO_2	– 0.0054 lb/1,000 gal based on AP-42 Table 1.5-1 dated 5/25 and an average sulfur content of 0.54 gr/100 ft^3

NO_x – 13 lb/1,000 gal from AP-42 Table 1.4-1 dated 5/25
CO – 7.5 lb/1,000 gal from AP-42 Table 1.4-1 dated 5/25
VOC – 1.0 lb/1,000 gal from AP-42 Table 1.4-2 dated 5/25
Visible Emissions – 06-096 C.M.R. ch. 101

The BACT emission limits for Boilers #1 and #2 are the following:

Unit	Fuel	Pollutant	lb/MMBtu
Boiler #1	Distillate Fuel	PM	0.08
Boiler #1	Propane	PM	0.05
Boiler #2	Distillate Fuel	PM	0.08
Boiler #2	Propane	PM	0.05

Unit	Fuel	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	Distillate Fuel	0.36	0.36	0.36	0.01	0.64	0.16	0.01
Boiler #1	Propane	0.22	0.22	0.22	-	0.64	0.37	0.05
Boiler #2	Distillate Fuel	0.36	0.36	0.36	0.01	0.64	0.16	0.01
Boiler #2	Propane	0.22	0.22	0.22	-	0.64	0.37	0.05

2. BPT Findings

The BPT emission limits for Boilers #4 and #5 were based on the following:

Distillate Fuel
$PM/PM_{10}/PM_{2.5}$ – 0.12 lb/MMBtu, 06-096 C.M.R. ch. 115, BPT
SO_2 – based on firing distillate fuel with a maximum sulfur content of 0.0015% by weight
NO_x – 0.3 lb/MMBtu, A-1063-71-A-N (11/1/2011), BACT
CO – 5 lb/1,000 gal from AP-42 Table 1.3-1 dated 5/10
VOC – 0.34 lb/1,000 gal from AP-42 Table 1.3-3 dated 5/10
Visible Emissions – 06-096 C.M.R. ch. 101

The BPT emission limits for Boilers #4 and #5 are the following:

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)
Boiler #4	0.34	0.34	0.34	-	0.85	0.10	0.01
Boiler #5	0.34	0.34	0.34	-	0.85	0.10	0.01

3. Visible Emissions

   Boilers #1 and #2
   When either unit is firing distillate fuel, visible emissions from Boilers #1 and #2 combined, exhausting from Stack #1, shall not exceed 20% opacity on a six-minute block average basis.

   When both units are firing propane, visible emissions from Boilers #1 and #2 combined, exhausting from Stack #1, shall not exceed 10% opacity on a six-minute block average basis.

   Boilers #4 and #5
   Visible emissions from Boilers #4 and #5 combined, exhausting from Stack #3, shall not exceed 20% opacity on a six-minute block average basis.

4. Periodic Monitoring

   Documentation shall include the type of fuel delivered and sulfur content of the fuel, as applicable.

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

   Due to their sizes, Boilers #1, #2, #4, and #5 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]

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

   Boilers #1, #2, #4, and #5 are 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 (Subpart JJJJJJ). Boilers #1 and #2 are considered new oil-fired boilers, and Boilers #4 and #5 are considered existing oil boilers, all each rated less than 10 MMBtu/hr. [40 C.F.R. §§ 63.11193 and 63.11195]

   Applicable federal 40 C.F.R. Part 63, Subpart JJJJJJ requirements include the following. Additional rule information can be found on EPA's website; https://www.epa.gov/stationary-sources-air-pollution/compliance-industrial-commercial-and-institutional-area-source.

a. Compliance Dates, Notifications, and Work Practice Standards

(1) Boiler Tune-Up Program

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

(ii) MSAD #20 shall conduct tune-ups on each of Boilers #1, #2, #4, and #5 at least once every five years with no more than 61 months between tune-ups except that the boilers are not required to startup for the sole purpose of conducting a tune-up. [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 for up to 72 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 for up to 72 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, a Notification of Compliance Status (NOCS) is required to be submitted to EPA. [40 C.F.R. § 63.11225(a)(4) and 40 C.F.R. § 63.11214(b)] MSAD #20 submitted a NOCS to EPA on February 1, 2016, for Boilers #4 and #5. Per EPA, new boilers that only have the requirement to conduct regular tune-ups do not need to submit a NOCS; therefore, a NOCS is not required for Boiler #1 or #2.

(2) Compliance Report

For every five-year compliance period, MSAD #20 shall prepare a compliance report by March 1st of the following year to document the information below for the five-year period for Boilers #1, #2, #4, and #5. 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."

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 (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ is satisfied by compliance with the more stringent six-year requirement.

C. Boiler #3

MSAD #20 operates Boiler #3 for facility heating. The boiler is rated at 3.0 MMBtu/hr and fires biomass. Previously, Boiler #3 had been licensed to also fire resinated wood, but MSAD #20 has requested the removal of that fuel from their license. The boiler was manufactured and installed in 2011. Exhaust gases from Boiler #3 pass through a multicyclone to control PM/PM_{10} emissions before exhausting through its own stack, Stack #2.

1. BPT Findings

   The BPT emission limits for Boiler #3 were based on the following:

   $PM/PM_{10}/PM_{2.5}$ – 0.25 lb/MMBtu, A-1063-71-A-N (11/1/2011), BACT
   SO_2 – 0.025 lb/MMBtu from AP-42 Table 1.6-2 dated 9/03
   NO_x – 0.22 lb/MMBtu from AP-42 Table 1.6-2 dated 9/03
   CO – 0.60 lb/MMBtu from AP-42 Table 1.6-2 dated 9/03
   VOC – 0.017 lb/MMBtu from AP-42 Table 1.6-3 dated 9/03
   Visible Emissions – 06-096 C.M.R. ch. 101

   The BPT emission limits for Boiler #3 are the following:

Unit	Pollutant	lb/MMBtu
Boiler #3	PM	0.25

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)
Boiler #3	0.75	0.75	0.75	0.08	0.66	1.81	0.05

   MSAD #20 shall continuously operate the multi-cyclone on Boiler #3 when Boiler #3 is in operation.

2. Visible Emissions

   Visible emissions from Boiler #3 shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time MSAD #20 shall either meet the normal operating visible emissions standard or the following alternative visible emissions standard.

   During periods of startup, shutdown, or malfunction, visible emissions shall not exceed 40% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive six-minute block averages) per event. If this alternative visible emissions standard is utilized, MSAD #20 shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.

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

   Due to its size, Boiler #3 is 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]

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

   Boiler #3 is 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. Boiler #3 is considered an existing biomass boiler less than 10 MMBtu/hr. [40 C.F.R. §§ 63.11193 and 63.11195]

   Applicable federal 40 C.F.R. Part 63, Subpart JJJJJJ requirements include the following. Additional rule information can be found on EPA's website; https://www.epa.gov/stationary-sources-air-pollution/compliance-industrial-commercial-and-institutional-area-source.

   a. Notifications and Work Practice Standards

      (1) Boiler Tune-Up Program

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

         (ii) MSAD #20 shall conduct tune-ups on Boiler #3 at least once every two years with no more than 25 months between tune-ups except that the boiler is not required to startup for the sole purpose of conducting a tune-up. [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)]

(2) Compliance Report

For every two-year compliance period, MSAD #20 shall prepare a compliance report by March 1st of the following year to document the information below for the two-year period. 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."

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 (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ is satisfied by compliance with the more stringent six-year requirement.

D. Fugitive Emissions

MSAD #20 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.

MSAD #20 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.

E. 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 operating the boilers for 8,760 hr/yr. For Boilers #1 and #2, calculations for CO and VOC were based on firing propane, and PM/PM_{10}/$PM_{2.5}$, SO_2, and NO_x were based on firing distillate fuel to provide worst-case emissions from each unit.

This information does not represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	CO	VOC
Boilers #1 and #2	3.2	3.2	3.2	0.1	5.6	3.2	0.4
Boiler #3	3.3	3.3	3.3	0.3	2.9	7.9	0.2
Boilers #4 and #5	3.0	3.0	3.0	-	7.4	0.8	0.1
Total TPY	**9.5**	**9.5**	**9.5**	**0.4**	**15.9**	**11.9**	**0.7**

Pollutant	Tons/year
Single HAP	7.9
Total HAP	19.9

III. Ambient Air Quality Analysis

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by-case basis. In accordance with 06-096 C.M.R. ch. 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM_{10}	25
$PM_{2.5}$	15
SO_2	50
NO_x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

This determination is based on information provided by the applicant regarding the expected operation of the proposed and licensed emission units. If the Department determines that any parameter (e.g., stack size, configuration, flow rate, emission rates, nearby structures, etc.) deviates from what was included in the application, the Department may require MSAD #20 to submit additional information and may require an ambient air quality impact analysis at that time.

Order

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

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

The Department hereby grants Air Emission License A-1063-71-C-R/A subject to the following conditions.

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

Standard Conditions

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S. § 347-C).

(2) The licensee shall acquire a new or amended air emission license prior to beginning actual construction of a modification, unless specifically provided for in Chapter 115. [06-096 C.M.R. ch. 115]

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 C.M.R. ch. 115]

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 C.M.R. ch. 115]

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S. § 353-A. [06-096 C.M.R. ch. 115] Payment of the annual air emission license fee for MSAD #20 is due by the end of November of each year. [38 M.R.S. § 353-A(3)]

(6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 115]

(7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 C.M.R. ch. 115]

(8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records

for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 C.M.R. ch. 115]

(9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 C.M.R. ch. 115]

(10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 C.M.R. ch. 115]

(11) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:

A. Perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
   1. Within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
   2. Pursuant to any other requirement of this license to perform stack testing.

B. Install or make provisions to install test ports that meet the criteria of 40 C.F.R. Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

C. Submit a written report to the Department within thirty (30) days from date of test completion.

[06-096 C.M.R. ch. 115]

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

A. Within thirty (30) days following receipt of the written test report by the Department, or another alternative timeframe approved by the Department, the licensee shall re-test the non-complying emission source under circumstances

representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department; and

B. The days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

C. The licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 C.M.R. ch. 115]

(13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or license requirement. [06-096 C.M.R. ch. 115]

(14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 C.M.R. ch. 115]

(15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 C.M.R. ch. 115]

(16) The licensee shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S. § 605).

Specific Conditions

(17) **Boilers #1, #2, #4, and #5**

A. Fuel

1. Boilers #1, #2, #4, and #5 are each licensed to fire distillate fuel. [06-096 C.M.R. ch. 115, BACT/BPT]
2. Boilers #1 and #2 are each licensed to fire propane. [06-096 C.M.R. ch. 115, BACT]
3. The facility shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [06-096 C.M.R. ch. 115, BACT/BPT]
4. Compliance shall be demonstrated by fuel records showing the type and the percent sulfur of the fuel delivered. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier, a statement from the supplier that the fuel delivered meets Maine's fuel sulfur content standards, certificate of analysis, or testing of fuel in the tank on-site. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following:

Emission Unit	Fuel	Pollutant	lb/MMBtu	Origin and Authority
Boiler #1	Distillate Fuel	PM	0.08	06-096 C.M.R. ch. 115, BACT
Boiler #1	Propane	PM	0.05	06-096 C.M.R. ch. 115, BACT
Boiler #2	Distillate Fuel	PM	0.08	06-096 C.M.R. ch. 115, BACT
Boiler #2	Propane	PM	0.05	06-096 C.M.R. ch. 115, BACT

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

Emission Unit	Fuel	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	Distillate Fuel	0.36	0.36	0.36	0.01	0.64	0.16	0.01
Boiler #1	Propane	0.22	0.22	0.22	-	0.64	0.37	0.05
Boiler #2	Distillate Fuel	0.36	0.36	0.36	0.01	0.64	0.16	0.01
Boiler #2	Propane	0.22	0.22	0.22	-	0.64	0.37	0.05
Boiler #4	Distillate Fuel	0.34	0.34	0.34	-	0.85	0.10	0.01
Boiler #5	Distillate Fuel	0.34	0.34	0.34	-	0.85	0.10	0.01

D. When either unit is firing distillate fuel, visible emissions from Boilers #1 and #2, which exhaust through Stack #1, shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, §§ 4(A)(2) and 4(D)(1)]

E. When firing propane in both Boilers #1 and #2, visible emissions from Stack #1 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, §§ 4(A)(3) and 4(D)(1)]

F. Visible emissions from Boilers #4 and #5, which exhaust through Stack #3, shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, §§ 4(A)(2) and 4(D)(1)]

G. MSAD #20 shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJJ applicable to Boilers #1, #2, #4, and #5 including, but not limited to, the following: [incorporated under 06-096 C.M.R. ch. 115, BPT/BACT]

1. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]

   a. MSAD #20 shall conduct tune-ups on Boilers #1, #2, #4, and #5 at least once every five years with no more than 61 months between tune-ups except that the boilers are not required to startup for the sole purpose of conducting a tune-up. [40 C.F.R. § 63.11223(a) and Table 2]

   b. 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 for up to 72 months from the previous. [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 for up to 72 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)]

c. Tune-Up Report: A tune-up report shall be maintained onsite and submitted to the Department and 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)]

2. Compliance Report

For every five-year compliance period, MSAD #20 shall prepare a compliance report by March 1st of the following year to document the information below for the five-year period. 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)]

a. Company name and address;
b. A statement of whether the source has complied with all the relevant requirements of this Subpart;
c. 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;
d. 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."

3. 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)]:

(1) Copies of notifications and reports with supporting compliance documentation;
(2) 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;
(3) Records of the occurrence and duration of each malfunction of each applicable boiler; and
(4) 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 (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ is satisfied by compliance with the more stringent six-year requirement.

(18) **Boiler #3**

A. Boiler #3 is licensed to burn biomass. [06-096 C.M.R. ch. 115, BPT]

B. MSAD #20 shall continuously operate the multi-cyclone on Boiler #3 when Boiler #3 is in operation. MSAD #20 shall maintain a log detailing all routine and non-routine maintenance on the multi-cyclone. The log shall include the date and maintenance description. [06-096 C.M.R. ch. 115, BPT]

C. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #3	PM	0.25	A-1063-71-A-N (11/1/2011), BACT

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

Emission 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)
Boiler #3	0.75	0.75	0.75	0.08	0.66	1.81	0.05

E. Visible emissions from Boiler #3 shall not exceed 30% opacity on a six-minute block average basis, except for periods of startup, shutdown, or malfunction during which time MSAD #20 shall either meet the normal operating visible emissions standard or the following alternative visible emissions standard.

During periods of startup, shutdown, or malfunction, visible emissions shall not exceed 40% opacity on a six-minute block average basis. This alternative visible emissions standard shall not be utilized for more than two hours (20 consecutive six-minute block averages) per event. If this alternative visible emissions standard is utilized, MSAD #20 shall keep records of the date, time, and duration of all startup, shutdown, and malfunction events and provide them to the Department upon request.

[06-096 C.M.R. ch. 101, § 4(A)(5)(a)]

F. MSAD #20 shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJJ applicable to Boiler #3 including, but not limited to, the following:
[incorporated under 06-096 C.M.R. ch. 115, BPT]

1. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]

   a. MSAD #20 shall conduct a tune-up on Boiler #3 at least once every two years with no more than 25 months between tune-ups except that the boiler is not required to startup for the sole purpose of conducting a tune-up. [40 C.F.R. § 63.11223(a) and Table 2]

   b. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
      (1) <u>As applicable</u>, 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)]

c. Tune-Up Report: A tune-up report shall be maintained onsite and submitted to the Department and 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)]

2. Compliance Report

For every two-year compliance period, MSAD #20 shall prepare a compliance report by March 1st of the following year to document the information below for the two-year period. 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)]

a. Company name and address;
b. A statement of whether the source has complied with all the relevant requirements of this Subpart;
c. 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;
d. 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."

3. 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)]:

   (1) Copies of notifications and reports with supporting compliance documentation;
   (2) 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;
   (3) Records of the occurrence and duration of each malfunction of each applicable boiler; and
   (4) 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 (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ is satisfied by compliance with the more stringent six-year requirement.

(19) **Fugitive Emissions** [06-096 C.M.R. ch. 101, § 4(C)]

A. MSAD #20 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. MSAD #20 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.

(20) **Additional Information**

If the Department determines that any parameter value pertaining to construction and operation of the emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, MSAD #20 may be required to submit additional information. Upon written request from the Department, MSAD #20 shall provide information necessary to demonstrate ambient air quality standards (AAQS) will not be exceeded, potentially including submission of an ambient air quality impact analysis or an application to amend this air emission license to resolve any deficiencies and ensure compliance with AAQS. Submission of this information is due within 60 days of the Department's written request unless otherwise stated in the Department's letter. [06-096 C.M.R. ch. 115, § 2(O)]

Done and Dated in Augusta, Maine this 12th day of JUNE, 2026.

Department of Environmental Protection

BY:_____
for Melanie Loyzim, Commissioner

The term of this license shall be ten (10) years from the signature date above.

[Note: If a renewal application, determined as complete by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 M.R.S. § 10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the license renewal application.]

Please note attached sheet for guidance on appeal procedures.

Date of initial receipt of application: April 14, 2026
Date of application acceptance: April 24, 2026

This Order prepared by Zac Hicks, Bureau of Air Quality.