



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

**Veterinary Support Services
Androscoggin County
Turner, Maine
A-887-71-F-R/A**

**Departmental
Findings of Fact and Order
Air Emission License**

After review of the air emission license application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Veterinary Support Services (VSS) has applied to renew their Air Emission License, permitting the operation of seven (7) Class IV-A (veterinary) incinerators, to dispose of animal remains.

VSS has also requested a modification to their License to remove one of their incinerators. The Unit was Licensed in A-887-71-B-A as Unit #6. VSS has also requested that the incinerator Licensed in A-877-71-C-A as Unit #7 be re-designated in this License as Unit #6.

B. Equipment to be Licensed

Units #1-#5 are B&L Cremation Systems, Inc., Model BLP 500 pet crematories, each with the following specifications:

Class Incinerator	IV-A
No. of Chambers	2
Type of Waste	Type 4
Max. Design Feed Rate	500 lb/load
Max. Design Firing Rate	150 lb/hr
Auxiliary Fuel Input:	
Primary Chamber (MMBtu/hr)	0.5, Propane
Secondary Chamber (MMBtu/hr)	1.0, Propane
Emission Control	Afterburner

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 624-6550 FAX: (207) 624-6024
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-6477 FAX: (207) 764-1507

Unit #6 is a B&L Cremation Systems, Inc., Model BLP 2000 pet crematory, with the following specifications:

Class Incinerator	IV-A
No. of Chambers	2
Type of Waste	Type 4
Max. Design Feed Rate	2000 lb/load
Max. Design Firing Rate	300 lb/hr
Auxiliary Fuel Input:	
Primary Chamber (MMBtu/hr)	1.5, Propane
Secondary Chamber (MMBtu/hr)	1.5, Propane
Emission Control	Afterburner

Unit #8 is a B&L Cremation Systems, Inc., Model BLI 400m pet crematory, with the following specifications:

Class Incinerator	IV-A
No. of Chambers	2
Type of Waste	Type 4
Max. Design Feed Rate	400 lb/load
Max. Design Firing Rate	75 lb/hr
Auxiliary Fuel Input:	
Primary Chamber (MMBtu/hr)	0.5, Propane
Secondary Chamber (MMBtu/hr)	0.75, Propane
Emission Control	Afterburner

C. Application Classification

The modification of a minor source is considered a major modification based on whether or not expected emission increases exceed the "Significant Emission Levels" as defined in the Department's regulations. This application is determined to be a minor source renewal with a minor modification and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 24, 2005).

II. BEST PRACTICAL TREATMENT

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 CMR 100 (last amended December 24, 2005). 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. BPT for each Class IV-A veterinary incinerator

Operating temperature in the secondary chamber or refractory lined stack shall be maintained at or above 1600⁰F with a stack gas retention time, at or above 1600⁰F, of at least 1.0 second.

To ensure an efficient burn, and to prevent odors and visible emissions, the secondary chamber shall be preheated, as specified by the manufacturer, until the pyrometer measures a minimum of 1400⁰F prior to commencing the burn cycle.

Once the burn cycle has commenced by introduction of primary chamber combustion, the incinerator shall be operated in an efficient manner, and as specified by the manufacturer, for the period of time between preheat and reaching the set operational temperature to be a minimum of 1600⁰F in the secondary chamber.

The temperature in the secondary chamber or refractory lined stack shall be maintained at or above 1600⁰F for the duration of the burn cycle.

A pyrometer and ¼ inch test port shall be installed and maintained at the location of the incinerator or refractory lined stack, which provides sufficient volume to insure a flue gas retention time of not less than 1.0 second at a minimum of 1600⁰F.

A log will be maintained recording the weight of the waste charged, preheat time, charging time and the temperature of the secondary chamber every 60 minutes after start-up until, and including, final shutdown time. For facilities operating a

chart recorder, the start time, date, and weight of waste charged may be logged on the chart.

A maximum particulate emission rate of 0.08 gr/dscf corrected to 12% CO₂ will be met. Emissions information is based on a licensed allowed particulate matter emission limit of 0.08 gr/dscf corrected to 12% CO₂, the burning of LP Gas as an auxiliary fuel, and the use of AP-42 factors: Tables 2.3-1 and 2.3-2 for biomedical waste incineration (dated 7/93) and Table 1.5-1 for the combustion of LP Gas (dated 7/08). The following emission factors shall be considered BPT:

- PM - 0.08 gr/dscf corrected to 12% CO₂.
- SO₂ - 2.17 lb/ton waste and 0.1 lb/1000 gallons LP Gas fired.
- NO_x - 3.56 lb/ton waste and 13.0 lb/1000 gallons LP Gas fired.
- CO - 2.95 lb/ton waste and 7.5 lb/1000 gallons LP Gas fired.
- VOC - 0.299 lb/ton waste and 1.0 lb/1000 gallons LP Gas fired.

Visible emissions from the incinerator shall not exceed 10% opacity based on a six (6) minute block average basis.

The ash will be disposed of in accordance with the requirements of the Bureau of Remediation and Waste Management.

The incinerator operator(s) shall receive adequate training to operate the incinerators in accordance with the manufacturer's specifications and shall be familiar with the terms of the Air Emission License.

C. Facility Emissions

Emissions are based on the continuous operation of each incinerator:

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

Pollutant	PM	PM₁₀	SO₂	NO_x	CO	VOC
Unit #1	1.46	1.46	0.72	2.08	1.49	0.17
Unit #2	1.46	1.46	0.72	2.08	1.49	0.17
Unit #3	1.46	1.46	0.72	2.08	1.49	0.17
Unit #4	1.46	1.46	0.72	2.08	1.49	0.17
Unit #5	1.46	1.46	0.72	2.08	1.49	0.17
Unit #6	2.43	2.43	1.44	4.16	2.99	0.34
Unit #8	1.22	1.22	0.37	1.34	0.92	0.11
Total Tons	10.95	10.95	5.41	15.90	11.36	1.30

III. AIR QUALITY ANALYSIS

According to 06-096 CMR 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Based on the total facility licensed emissions, VSS is below the emissions level required for modeling and monitoring.

ORDER

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

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

The Department hereby grants Air Emission License A-887-71-F-R/A, subject to the following conditions:

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License 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.A. §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 Chapter 115. [06-096 CMR 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 CMR 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 CMR 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353. [06-096 CMR 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 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 CMR 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 CMR 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 CMR 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 CMR 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR 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 CFR 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 CMR 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 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 CFR 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 CMR 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 Part 70 license requirement. [06-096 CMR 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 emission 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 CMR 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 CMR 115]

SPECIFIC CONDITIONS

- (16) Each incinerator shall be used for the disposal of type 4 (veterinary) waste and shall not be used for the disposal of plastics (other than the bag containing the animal), cytotoxic (antineoplastic) drugs or any radioactive wastes and shall not be used to dispose of any medical waste classified as type 7 waste, as defined in 06-096 CMR 100. [06-096 CMR 115, BPT]
- (17) The incinerators shall not exceed the maximum design charging rate outlined below. Auxiliary fuel input to the primary and secondary chamber shall be LP Gas. [06-096 CMR 115, BPT]
- | | |
|---------------|----------|
| Units #1 - #5 | 500 lbs |
| Unit #6 | 2000 lbs |
| Unit #8 | 400 lbs |
- (18) A log shall be maintained for each incinerator recording the weight of each charge, preheating time, charging time, afterburner temperature directly after charging and every 60 minutes after startup until, and including, final shutdown

time, and time of final shutdown. For facilities operating a chart recorder, the start time, date, and weight of waste charged may be logged on the chart. [06-096 CMR 115, BPT]

- (19) The secondary chamber shall be preheated as specified by the manufacturer to a minimum of 1400⁰F prior to combusting any waste and shall be maintained at a minimum of 1600⁰F during the duration of the burn. [A-887-71-A-N, A-887-71-D-A]
- (20) Once the burn cycle has commenced by introduction of primary chamber combustion, the incinerator shall be operated in an efficient manner and as specified by the manufacturer for the period of time between preheat and reaching the set operational temperature to be a minimum of 1600⁰F in the secondary chamber. [06-096 CMR 115, BPT]
- (21) A pyrometer and ¼ inch test port shall be operated and maintained at that location of each incinerator or refractory lined stack which provides sufficient volume to insure a flue gas retention time of not less than 1.0 second at the minimum of 1600⁰F. [06-096 CMR 115, BPT]
- (22) Veterinary Support Services shall not exceed a particulate matter emission limit of 0.08 gr/dscf corrected to 12% CO₂ from the auxiliary fuel. Therefore, based on the maximum design combustion rate and continuous operation of the incinerators, emissions shall be limited to the following [06-096 CMR 115, BPT]:

Pollutant	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
Unit #1	0.33	0.33	0.17	0.48	0.34	0.04
Unit #2	0.33	0.33	0.17	0.48	0.34	0.04
Unit #3	0.33	0.33	0.17	0.48	0.34	0.04
Unit #4	0.33	0.33	0.17	0.48	0.34	0.04
Unit #5	0.33	0.33	0.17	0.48	0.34	0.04
Unit #6	0.56	0.56	0.34	0.94	0.68	0.07
Unit #8	0.28	0.28	0.09	0.30	0.21	0.02

- (23) Visible emissions from the stack serving each incinerator shall not exceed an opacity limit of 10% based on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 3-hour period. [06-096 CMR 101]
- (24) The ash will be disposed of in accordance with the requirements of the Bureau of Remediation and Waste Management. [06-096 CMR 115, BPT]
- (25) The incinerator operator(s) shall receive adequate training to operate the incinerators in accordance with the manufacturer's specifications, and shall be familiar with the terms of this Air Emission License as it pertains to the operation of the incinerator. [06-096 CMR 115, BPT]

Veterinary Support Services
Androscoggin County
Turner, Maine
A-887-71-F-R/A

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Departmental
Findings of Fact and Order
Air Emission License

- (26) Though it is not being required now, the installation and operation of continuous chart recording devices may become necessary to document compliance with the temperature requirements of this license. Should the Bureau of Air Quality determine that continuous recording devices are necessary, the licensee shall, within 120 days, demonstrate that continuous recorders have been installed and are operational. [06-096 CMR 115, BPT]

DONE AND DATED IN AUGUSTA, MAINE THIS 2ND DAY OF October, 2009.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brookes
DAVID P. LITTELL, COMMISSIONER

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

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 2/5/2009

Date of application acceptance: 2/27/2009

Date filed with the Board of Environmental Protection: _____

This Order prepared by Jonathan Voisine, Bureau of Air Quality.

