

**Greenville Steam Company  
Piscataquis County  
Greenville Junction, Maine  
A-261-77-1-A**

**Departmental  
Findings of Fact and Order  
Part 70 Air Emission License  
New Source Review #1**

After review of the Part 70 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

FACILITY	Greenville Steam Company (GSC)
PART 70 LICENSE NUMBER	A-261-70-A-I
LICENSE TYPE	Chapter 115 Minor Modification
NAICS CODES	221119
NATURE OF BUSINESS	Electric Power Generation
FACILITY LOCATION	185 Greenville Steam Road, Greenville Junction
PART 70 LICENSE ISSUANCE DATE	August 7, 2003
PART 70 LICENSE EXPIRATION DATE	August 7, 2008

B. Amendment Description

Greenville Steam Company (GSC) is seeking certification as a renewable energy generator by the State of Massachusetts (MA). Once certified, GSC will be allowed the opportunity to compete for the sale of renewable energy credits (RECs) directly to those generators or their energy marketing representatives which must have these credits to meet their Renewable Portfolio Standard (RPS) requirements. The MA RPS program requires "new, low emission innovative technology".

GSC has requested a minor modification to their license to install several pollution reduction technologies as part of their effort to meet Massachusetts certification requirements. These include installation of a bubbling fluidized bed system, addition of new overfire air delivery system, and the addition of a Selective Non-catalytic Reduction (SNCR) system.

GSC has also requested that coffee grounds be added to the list of materials they are allowed to burn in Boiler #1A.

C. Application Classification

The application for GSC does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping. This application does seek to modify a Best Available Control Technology (BACT) analysis performed per New Source Review.

Additionally, the modification of a major source is considered a major modification based on whether or not expected emissions increases exceed the “Significant Emission Increase Levels” as given in MEDEP Chapter 100.

The emission increases are determined by subtracting the average actual emissions of the 24 months preceding the modification (or representative 24 months) from the maximum future license allowed emissions. The results of this test are as follows:

Pollutant	Average Past Actuals 9/03 – 8/05 (ton/year)	Future Permit (ton/year)	Net Change (ton/year)	Significance Level (ton/year)
PM	21.8	32.9	+11.1	25
PM <sub>10</sub>	21.8	32.9	+11.1	15
SO <sub>2</sub>	38.6	55.0	+16.4	40
NO <sub>x</sub>	156.0	195.0	+39.0	40
CO	366.0	394.2	+28.2	100
VOC	63.1	98.6	+35.5	40

Note: The above numbers are for Boiler #1A only. None of the other equipment at the facility is affected by this amendment.

Therefore, this amendment is determined to be a minor modification under MEDEP Chapters 115 and has been processed as such.

## **II. FACILITY AND EMISSION UNIT DESCRIPTION**

### **A. Boiler #1A**

Boiler #1 was originally manufactured by Babcock & Wilcox with a maximum design heat input of 271.3 MMBtu/hr.

In order to meet MA RPS, GSC is proposing to install several pollution control technologies. The existing grate and overfire air system will be removed and a fluidized bed bottom will be fitted under the existing boiler. The bubbling fluidized bed retrofit, combined with new staged combustion, will provide reduced oxygen availability in the primary combustion zone. This will reduce the opportunity for NO<sub>x</sub> formation. In the main furnace chamber, the introduction and direction of air will be closely controlled by location and port design to give complete burn out of the fuel, thus reducing NO<sub>x</sub>, PM, VOC, and CO emissions.

GSC will also be installing SNCR to enhance NO<sub>x</sub> reduction. This system will be used as needed to comply with emission standards.

Due to the extreme nature of the reconfiguration of Boiler #1, it is being re-named Boiler #1A to delineate it as a separate and different boiler than the previous Boiler #1.

These physical changes to Boiler #1A will result in an increase in thermal efficiency. The estimated maximum sustainable heat input capacity of Boiler #1A will increase to approximately 292 MMBtu/hr with short term peak capacity of 300 MMBtu/hr.

Boiler #1A will continue to be licensed to fire multiple fuels including: biomass (wood waste, whole tree chips, and other wood byproducts), #2 fuel oil, specification waste oil, vehicle carpet waste, knots/screens, mixed laminate, and construction and demolition (C&D) wood. Additionally, GSC has requested the addition of coffee grounds as an additional permitted fuel.

This modification will further restrict the oil firing capacity of Boiler #1A. The maximum auxiliary oil heat input to Boiler #1A from #2 fuel oil will change from 98.3 MMBtu/hr to 16.2 MMBtu/hr.

### **NSPS**

New Source Performance Standard (NSPS) 40 CFR Part 60, Subpart D does not apply to this equipment since Boiler #1A has a maximum heat input firing fossil fuel of less than 250 MMBtu/hr.

NSPS Subpart Da does not apply since Boiler #1A is not an electrical utility steam generating unit.

Boiler #1A is subject to NSPS Subpart Db. This modification is classified as a “reconstruction” and Boiler #1A is subject to the relevant provisions of the subpart for reconstructed boilers.

Section 60.42b of NSPS Subpart Db establishes standards for emissions of sulfur dioxide from facilities that combust coal or oil. This section only counts heat input supplied to the facility from the combustion of coal or oil. Contributions from other fuels, such as wood, are not applicable. Section 60.42b(j) exempts facilities which combust only very low sulfur oil. Very low sulfur oil is defined as having a sulfur content of 0.5% or less by weight.

Section 60.43b(c) of NSPS Subpart Db establishes the particulate matter standards for facilities that combust wood and oil. GSC has accepted emission limits more stringent than the NSPS as indicated in streamlining below. GSC is subject to the opacity standards established in Section 60.43b(f).

Section 60.44b(c) of NSPS Subpart Db establishes a NO<sub>x</sub> standard for simultaneous combustion of oil and wood or other fuels. This section also exempts facilities that have an annual capacity factor for oil of 10% or less. The 10% capacity factor must be subject to a Federally enforceable limitation. This license includes a Federally enforceable limit that restricts GSC to an annual fuel oil use of 30,000 gallons per year or less. This equates to an annual capacity factor for oil of significantly less than 10%.

**BACT**

The nature and extent of the changes proposed to Boiler #1A require a reevaluation of Best Available Control Technology (BACT) for Boiler #1A. A summary of the 2005 BACT for Boiler #1A is as follows:

1. Installation of a bubbling fluidized bed and staged combustion.
2. The following emission limits:

Pollutant	lb/MMBtu	lb/hr
PM	0.025	7.5
PM <sub>10</sub>	--	7.5
SO <sub>2</sub>	--	63.9
NO <sub>x</sub>	0.15	45.0
CO	0.30	90.0
VOC	--	22.5

3. GSC shall collect and submit to the Department daily NO<sub>x</sub> average data for the first 12 months of operation. At that time the Department will re-asses the appropriateness of the NO<sub>x</sub> emission limits. The environmental, economic, and energy impacts will be taken into consideration to determine if a limit between 0.12 lb/MMBtu and 0.15 lb/MMBtu is more appropriate. The Department may choose to impose this more stringent limit through a minor revision to GSC's Part 70 license at that time.
4. An emission limit of 25 ppm for NH<sub>3</sub> at 7% O<sub>2</sub>.
5. A fuel oil sulfur content limit of 0.5% by weight.
6. A fuel oil limit of 30,000 gallons per year.
7. Operation of all ESP banks during all firing of C&D wood.

#### Initial Startup

The physical changes proposed for Boiler #1A constitute a reconstruction as defined by 40 CFR Part 60. Therefore, GSC must comply with all applicable emission standards and monitoring requirements within 180 days of initial startup.

The first 30 days after initial startup shall be considered a stabilization period, after which the monitoring requirements of MEDEP Chapter 117 shall apply. During the stabilization period, GSC shall maintain best management practices to minimize all air emissions associated with Boiler #1A in accordance with its existing air emissions license, however, numerical emission limits and monitoring requirements shall not apply.

The previous emission limits listed in Air Emission License A-261-70-A-I shall apply after the initial stabilization period until completion of the initial compliance test which will take place no later than 180 days after initial startup. After completion of the initial compliance test, the emission limits and monitoring requirements specified in this Order shall apply.

#### Streamlining

1. Opacity
  - a. MEDEP Chapter 101, Section 2(B)(1)(e) and Section 3 contain applicable opacity standards.
  - b. NSPS 40 CFR Part 60.43b(f) contains an applicable opacity standard.

GSC accepts streamlining for the opacity standard. The NSPS standard is the most stringent and is therefore the only opacity standard listed in this license.

2. PM

- a. MEDEP Chapter 103, Section 2(A)(3)(b) contains an applicable PM lb/MMBtu emission standard.
- b. NSPS 40 CFR Part 60.43b contains an applicable PM lb/MMBtu emission standard.
- c. BACT establishes an applicable PM lb/MMBtu emission limit.

GSC accepts streamlining for the PM lb/MMBtu standard. The BACT limit is the most stringent and is therefore the only PM lb/MMBtu emission limit included in this license.

- d. BACT establishes the only applicable PM lb/hr emission limit.  
**No streamlining requested.**

3. PM<sub>10</sub>

BACT establishes the only applicable PM<sub>10</sub> lb/hr emission limit.  
**No streamlining requested.**

4. SO<sub>2</sub>

- a. MEDEP Chapter 106, Section 2(A)(2) contains an applicable fossil fuel sulfur content standard.
- b. BACT establishes an applicable fossil fuel sulfur content standard.

GSC accepts streamlining for the fossil fuel sulfur content standard. The BACT limit is the most stringent and is therefore the only sulfur content standard included in this license.

- c. BACT establishes the only applicable SO<sub>2</sub> lb/hr emission limit.  
**No streamlining requested.**

5. NO<sub>x</sub>

- a. MEDEP Chapter 138 establishes an applicable NO<sub>x</sub> lb/MMBtu emission limit.
- b. BACT establishes an applicable NO<sub>x</sub> lb/MMBtu emission limit.

GSC accepts streamlining for the NO<sub>x</sub> lb/MMBtu standard. The BACT limit is the most stringent and is therefore the only PM lb/MMBtu emission limit included in this license.

- c. BACT establishes the only applicable NO<sub>x</sub> lb/hr emission limit.  
**No streamlining requested.**

6. CO
  - a. BACT establishes the only applicable CO lb/MMBtu emission limit.  
**No streamlining requested.**
  - b. BACT establishes the only applicable CO lb/hr emission limit.  
**No streamlining requested.**
7. VOC  
BACT establishes the only applicable VOC lb/hr emission limit.  
**No streamlining requested.**

Periodic Monitoring

Periodic monitoring for Boiler #1A shall consist of the following record keeping:

- a. The amount of each fuel fired on a monthly as well as a 12 month rolling total basis.
- b. Sulfur content of the fuel oil fired in Boiler #1A.
- c. Sulfur content of any alternative fuel (vehicle carpet waste, knots/screens, mixed laminate waste, C&D wood, coffee grounds) fired on a semi annual basis.
- d. Records of the fuel testing required by MEDEP Chapter 418.
- e. Number of ESP banks in operation at any time.
- f. Whether or not C&D wood is being fired in the boiler at any time.

Periodic monitoring for Boiler #1A shall also consist of the following:

Item to be Monitored	Monitor	Record
ESP Applied Voltage	continuously	every 12 hours
ESP Applied Amperage	continuously	every 12 hours

Periodic monitoring also includes the instrument monitoring and record keeping requirements in MEDEP Chapter 117.

GSC shall continue to perform stack testing on Boiler #1A for particulate matter in accordance with 40 CFR Part 60, Appendix A, Method 5 every other year for which the boiler has operated more than 1,000 hours.

GSC shall perform stack testing on Boiler #1A for the compounds listed below\* based on the following schedule:

If GSC fires 25 to 50% C&D (based on an annual average), stack testing for the compounds listed\* shall be performed two times per year (spaced at least 4 months apart) for two years.

If GSC fires 10 to 25% C&D (based on an annual), stack testing for the compounds listed\* shall be performed once per calendar year for two years.

If GSC fires less than 10% C&D, no additional testing is required.

\*The chemicals and compounds to be stack tested for are: Antimony, Arsenic Cadmium, Chromium III, Chromium VI, Copper, Lead, Mercury, Nickel, Selenium, Vanadium, Hydrogen Chloride, and Dioxin.

In the event that Boiler #1A is in the process of a cold startup, GSC shall monitor and record Steam Drum Temperature at a minimum of once per hour.

During cold startup, GSC shall also record the opacities which are greater than 20% on a six minute average, except for one 6 minute period per hour of not more than 27% opacity. The record keeping associated with cold startup shall be considered part of GSC's periodic monitoring program.

Based on best management practices and the type of fuel for which the boiler was designed it is unlikely that Boiler #1A will exceed the emission limits for VOC. Therefore, periodic monitoring by the source for VOCs is not required. However, neither the EPA nor the State is precluded from requesting GSC to perform testing and may take enforcement action for any violations discovered.

#### Parameter Monitors

There are no Parameter Monitors required for Boiler #1A.

#### CEMS and COMS

1. MEDEP Chapter 117 contains an applicable requirement to monitor opacity and NO<sub>x</sub> emissions.
2. MEDEP Chapter 138 contains and applicable requirement to monitor NO<sub>x</sub> lb/MMBtu emissions.
3. BACT establishes an applicable requirement to monitor CO lb/MMBtu emissions.

Based on the above, GSC shall operate a CEMS which provides data to calculate NO<sub>x</sub> lb/MMBtu, CO lb/MMBtu, and O<sub>2</sub> ppm from Boiler #1A. Opacity from the stack shall be monitored by a COMS.

B. Facility Emissions

**Total Licensed Annual Emission for the Facility  
Tons/year**

(used to calculate the annual license fee)

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
Boiler #1A	32.9	32.9	55.0	195.0	394.2	98.6
Boiler #2	1.4	1.4	8.0	4.0	0.4	0.1
Emerg. Generator	0.2	0.2	0.1	6.3	1.7	0.2
<b>Total TPY</b>	<b>34.5</b>	<b>34.5</b>	<b>63.1</b>	<b>205.3</b>	<b>514.6</b>	<b>114.6</b>

**III. AIR QUALITY ANALYSIS**

GSC 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. The proposed emission levels for all pollutants are at or below previously modeled levels. Therefore, no additional modeling analysis is required for this modification.

**ORDER**

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

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

The Department hereby grants the Chapter 115 Minor Modification A-261-77-1-A pursuant to the preconstruction licensing requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

For each standard and special 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, 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.

The following will eventually replace Conditions (14) and (15) of Air Emission License A-261-70-A-I:

(1) **Boiler #1A**

- A. GSC is licensed to operate Boiler #1A which is licensed to fire biomass (wood waste, whole tree chips, and other wood byproducts), #2 fuel oil, specification waste oil, vehicle carpet waste, knots/screens, mixed laminate, C&D wood, and coffee grounds. [MEDEP Chapter 115, BACT]
- B. Boiler #1A is subject to, and shall comply with, 40 CFR Part 60, Subparts A and Db. [40 CFR Part 60, Subpart Db]
- C. GSC shall not exceed a heat input to Boiler #1A of 16 MMBtu/hr from fuel oil. [MEDEP Chapter 115, BACT]
- D. GSC shall not fire greater than 30,000 gallons per year, based on a 12 month rolling total, of fuel oil. [MEDEP Chapter 115, BACT & 40 CFR Part 60.44b(c)]
- E. The sulfur content of the fuel oil fired shall not exceed 0.5% by weight demonstrated by purchase records from the supplier or by other methods approved by the Department. [MEDEP Chapter 115, BPT & 40 CFR Part 60.42b(j)]
- F. Emissions from Boiler #1A shall not exceed the following limits:

Pollutant	Lb/MMBtu	Origin and Authority	Enforceability
PM	0.025	MEDEP Chapter 115, BACT	Federally Enforceable
NO <sub>x</sub>	0.15	MEDEP Chapter 115, BACT	Federally Enforceable
CO	0.30	MEDEP Chapter 115, BACT	Federally Enforceable

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	7.5	MEDEP Chapter 115, BACT	Federally Enforceable
PM <sub>10</sub>	7.5	MEDEP Chapter 115, BACT	Federally Enforceable
SO <sub>2</sub>	63.9	MEDEP Chapter 115, BACT	Federally Enforceable
NO <sub>x</sub>	45.0	MEDEP Chapter 115, BACT	Federally Enforceable
CO	90.0	MEDEP Chapter 115, BACT	Federally Enforceable
VOC	22.5	MEDEP Chapter 115, BACT	Federally Enforceable

Pollutant	TPY	Origin and Authority	Enforceability
SO <sub>2</sub>	55.0	MEDEP Chapter 115, BACT	Federally Enforceable
NO <sub>x</sub>	195.0	MEDEP Chapter 115, BACT	Federally Enforceable
CO	394.2	MEDEP Chapter 115, BACT	Federally Enforceable
Lead	0.6	MEDEP Chapter 140, BPT	Federally Enforceable

Pollutant	ppmv	Origin and Authority	Enforceability
NH <sub>3</sub>	25 @ 7% O <sub>2</sub>	MEDEP Chapter 115, BACT	Federally Enforceable

- G. GSC shall collect and submit to the Department daily NO<sub>x</sub> average data for the first 12 months of operation. At that time the Department will re-asses the appropriateness of the NO<sub>x</sub> emission limits. The environmental, economic, and energy impacts will be taken into consideration to determine if a limit between 0.12 lb/MMBtu and 0.15 lb/MMBtu is more appropriate. The Department may choose to impose this more stringent limit through a minor revision to GSC’s Part 70 license at that time. [MEDEP Chapter 115, BACT]
- H. Compliance with the Particulate Matter limits shall be demonstrated by stack testing performed once every other year if Boiler #1A is operated more than 1,000 hours per calendar year. Only years in which the boiler is operated more than 1,000 hours shall be included in determining the necessary testing frequency under this paragraph. Tests shall be completed by December 31<sup>st</sup> of the years requiring testing. The tests shall be performed varying the fuel fired, representative of the operations of the boiler. The stack test shall comply with all requirements of the Department’s Compliance Test Protocol and with 40 CFR Part 60, as appropriate, or other methods approved by the Department. [MEDEP Chapter 115, BACT]
- I. GSC shall sample the sulfur content of any alternative fuel (vehicle carpet waste, knots/screens, mixed laminate waste, C&D wood, coffee grounds, etc.) fired in Boiler #1A on a semiannual basis to be used to demonstrate compliance with the SO<sub>2</sub> lb/hr and ton/year emission limits. The test results and the calculations used to determine compliance shall be included in the quarterly report submitted for the quarter in which the tests were performed. MEDEP may suspend this requirement via letter if it finds that the sulfur contents are found to be consistently insignificant. Additionally, stack testing to demonstrate compliance with the SO<sub>2</sub> lb/hr limit shall be performed upon request by the Department. [MEDEP Chapter 115, BACT]

- J. Compliance with the NO<sub>x</sub> lb/MMBtu emission limit shall be demonstrated by means of a CEMS. Compliance shall be based on a 30-day rolling average basis. Periods of startup, shutdown, and equipment malfunction shall not be included in determining the 30-day rolling arithmetic average emission rates provided that operating records are available to demonstrate that the facility was being operated to minimize emissions. [MEDEP Chapter 115, BACT]
- K. Compliance with the NO<sub>x</sub> lb/hr emission limit shall be demonstrated by stack testing upon request by the Department. [MEDEP Chapter 115, BACT]
- L. Compliance with the CO lb/MMBtu emission limits shall be on a 30-day rolling average basis, demonstrated by means of a CEMS. [MEDEP Chapter 115, BACT]
- M. The CO lb/MMBtu limits shall apply at all times, except periods of startup, shutdown, equipment malfunction, and the 48 hours immediately following a cold startup as defined in Section II(A)(1) of Air Emission License A-261-70-A-I. These periods shall not be included in determining the arithmetic average emission rates provided that operating records are available to demonstrate that the facility was being operated to minimize emissions. [MEDEP Chapter 115, BACT]
- N. The CO lb/hr limit shall apply at all times and shall be demonstrated by stack testing upon request by the Department. [MEDEP Chapter 115, BACT]
- O. Compliance with the NO<sub>x</sub> and CO ton per year limits shall be on a 12-month rolling total basis and demonstrated by record keeping of boiler fuel use and CEM data. [MEDEP Chapter 115, BACT]
- P. VOC lb/hr limits shall be demonstrated by stack testing upon request by the Department in accordance with 40 CFR Part 60, Appendix A. [MEDEP Chapter 115, BACT]
- Q. GSC shall perform stack testing on Boiler #1A for the compounds listed in Condition (14)(P)(4) below based on the following schedule:
  - 1. If GSC fires 25 to 50% C&D (based on an annual average), stack testing for the listed compounds shall be performed two times per year (no closer than four months apart) for two years.
  - 2. If GSC fires 10 to 25% C&D (based on an annual), stack testing for the listed compounds shall be performed once per calendar year for two years.
  - 3. If GSC fires less than 10% C&D, no additional testing is required.

4. The compounds to be stack tested for are: Antimony, Arsenic Cadmium, Chromium III, Chromium VI, Copper, Lead, Mercury, Nickel, Selenium, Vanadium, Hydrogen Chloride, and Dioxin.

[MEDEP Chapter 115, BACT]

- R. Compliance with the NH<sub>3</sub> ppmv emission limit shall be based on a 1-hour average demonstrated by stack testing within 180 days of startup after reconstruction. [MEDEP Chapter 115, BACT]
- S. GSC shall continue to operate and maintain a multicyclone and an electrostatic precipitator (ESP) on Boiler #1A for the control of particulate matter. When no C&D wood is being fired in Boiler #1A, GSC shall operate, at a minimum, the number of fields which successfully demonstrated compliance during the most recent PM stack test. [MEDEP Chapter 115, BACT]
- T. GSC shall maintain and operate a continuous opacity monitor (COM) on Boiler #1A in accordance with Chapter 117. The COM shall meet the monitoring requirements of 40 CFR Part 60.13 as well as 40 CFR Part 60, Appendix B. [MEDEP Chapter 115, BACT]
- U. GSC shall maintain and operate a continuous emission monitor (CEM) on Boiler #1A for NO<sub>x</sub> in accordance with MEDEP Chapter 117 and 40 CFR Part 60, Appendices B and F. [MEDEP Chapter 115, BACT]
- V. GSC shall maintain and operate a continuous emission monitor (CEM) on Boiler #1A for CO in accordance with MEDEP Chapter 117 and 40 CFR Part 60, Appendices B and F. [MEDEP Chapter 115, BACT]
- W. GSC shall monitor and record the following as specified for Boiler #1A:

<b>Item to be Monitored</b>	<b>Monitor</b>	<b>Record</b>
ESP Applied Voltage	continuously	every 12 hours
ESP Applied Amperage	continuously	every 12 hours

- X. The opacity from Boiler #1A shall not exceed 20% on a six (6) minute block average except for one (1) six (6) minute block average per hour of not more than 27% opacity. This opacity standard shall apply at all times except during periods of cold startup. For the purpose of this license, a cold startup of Boiler #1A shall be any startup of Boiler #1A which meets the criteria listed in Section II(A)(1) of Air Emission License A-261-70-A-I. [40 CFR Part 60, Subpart Db and MEDEP Chapter 115, BACT]

- Y. GSC shall record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for distillate oil and wood for the reporting period. The annual capacity factor is determined on a 12-month rolling basis with a new annual capacity factor calculated at the end of each calendar month. [40 CFR Part 60, Subpart Db]
- Z. GSC shall submit excess opacity emissions and monitoring systems performance reports to MEDEP and EPA semiannually. All reports shall be postmarked by the 30<sup>th</sup> day following the end of each six month period. The following address for EPA shall be used for any reports or notification required to be copied to them:

Compliance Clerk  
USEPA Region 1  
1 Congress Street  
Boston, MA 02114-2023

[40 CFR Part 60, Subpart Db]

**The following will eventually replace Condition (17) of Air Emission License A-261-70-A-I:**

**(2) Construction and Demolition Wood**

- A. GSC shall limit the annual fuel usage and quarterly feed rate of construction and demolition debris into Boiler #1A to no more than 50% by weight of the annual fuel use. For the purpose of this license, construction and demolition debris shall be chipped wood demolition debris from which painted and chemically treated wood and wood mixed with roofing and other non-wood related demolition products have been removed such that the amount remaining is determined to be insignificant. [[MEDEP Chapter 115, BACT]
- B. GSC shall comply with all fuel sampling and quality requirements of MEDEP Chapter 418. [MEDEP Chapter 418]
- C. When firing C&D wood, GSC shall operate all fields of the ESP. If during operation one or more ESP fields fail or is otherwise not operated, GSC shall discontinue firing C&D wood within 4 hours of the failure. [MEDEP Chapter 115, BACT]

**The following will eventually replace Condition (21) of Air Emission License A-261-70-A-I:**

**(3) Monitoring and Recordkeeping Requirements**

[MEDEP Chapters 140 and 117]

A. The following are identified as Periodic Monitors:

1. The amount of each fuel fired in Boiler #1A on a monthly as well as a 12 month rolling total basis.
2. Sulfur content of the fuel oil fired in Boiler #1A.
3. Sulfur content of any alternative fuel (vehicle carpet waste, knots/screens, mixed laminate waste, C&D wood, coffee grounds) fired on a semi annual basis.
4. Fuel sampling as required by MEDEP Chapter 418.
5. ESP voltage and amperage as applied.
6. Number of ESP banks in operation at any time.
7. Whether or not C&D wood is being fired in Boiler #1A at any time.
8. Hours of operation for Generator #1.
9. Sulfur content of the fuel oil fired in Generator #1.

B. For all CEMS and COMS record keeping shall include:

1. Documentation that all CEMS and COMS are continuously accurate, reliable and operated in accordance with Chapter 117, 40 CFR Part 51, Appendix P, and 40 CFR Part 60, Appendices B and F;
2. Records of all measurements, performance evaluations, calibration checks, and maintenance or adjustments for each CEMS and COMS as required by 40 CFR Part 51 Appendix P;
3. A report of other data indicative of compliance with the applicable emission standard for those periods when the CEMS or COMS were not in operation or produced invalid data. In the event the Department does not concur with the licensee's compliance determination, the licensee shall, upon the Departments request, provide additional data, and shall have the burden of demonstrating that the data is indicative of compliance with the applicable standard.

**The following will be new Conditions:**

**(4) Initial Startup After Reconstruction**

- A. GSC shall comply with all applicable emission standards and monitoring requirements within 180 days of initial startup after reconstruction.  
[40 CFR Part 60, Subparts A and Db]

- B. GSC shall perform an initial compliance test no later than 180 days after initial startup after reconstruction for PM and NH<sub>3</sub>. [40 CFR Part 60, Subparts A and Db and MEDEP Chapter 115, BACT]
- C. The first 30 days after initial startup from reconstruction shall be considered a stabilization period. During the stabilization period, GSC shall maintain best management practices to minimize air emissions, however, numerical emission limits and monitoring requirements shall not apply. [MEDEP Chapter 115, BACT]
- D. After the stabilization period, the monitoring requirements of MEDEP Chapter 117 shall apply. [MEDEP Chapter 115, BACT]
- E. The previous emission limits for Boiler #1A listed in Air Emission License A-261-70-A-I shall apply after the initial stabilization period until completion of the initial compliance test or 180 days after initial startup, whichever is sooner. [MEDEP Chapter 115, BACT]

(5) **Air Toxics Emissions Statement**

If GSC exceeds the thresholds for HAPs listed in Appendix A of MEDEP Chapter 137 in an inventory year, in accordance with MEDEP Chapter 137 the licensee shall report, no later than July 1 every three years (2005, 2008, 2011, etc.) or as otherwise stated in Chapter 137, the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a computer program supplied by the Department or a written emission statement containing the information required in MEDEP Chapter 137.

NOTE: Based on emission factors developed by the Eastern Research Group (ERG) in their memo "Development of Average Emission Factors and Baseline Emission Estimates for the Industrial, Commercial and Institutional Boilers and Process Heaters National Emission Standard for Hazardous Air Pollutants" dated October 2002, GSC will most likely exceed the Chapter 137 thresholds of HAPs based on fuel burning alone should the facility exceed a firing rate of 4,698 tons of wood in a calendar year.

