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

DEPARTMENT ORDER

Portland Water District **Cumberland County** **Standish, Maine** **A-559-71-I-R**	**Departmental** **Findings of Fact and Order** **Air Emission License** **Renewal**

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

Portland Water District (PWD) has applied to renew their Air Emission License for the operation of emission sources associated with their water treatment facility.

The equipment addressed in this license is located at 2 Whiterock Rd, Standish, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Stationary Engines

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (HP)	Fuel Type	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.	Stack #
Generator #1	10.1	1,086	Distillate fuel	73.7	1992	1993	1
Generator #2 (emergency)	10.1	1,086	Distillate fuel	73.7	1992	1993	2

PWD may operate small stationary engines smaller than 0.5 MMBtu/hr. These engines are considered insignificant activities and are not required to be included in this license. However, they are still subject to applicable State and Federal regulations. More information regarding requirements for small stationary engines is available on the Department's website at the link below.
http://www.maine.gov/dep/air/publications/docs/SmallRICEGuidance.pdf

Additionally, PWD may operate portable engines used for maintenance or emergency-only purposes. These engines are considered insignificant activities and are not required to be

included in this license. However, they may still be subject to applicable State and Federal regulations.

Insignificant Emissions Units

PWD operates six space-heating boilers and two water heaters. These are considered insignificant emissions units because they are each rated below 1.0 MMBtu/hr, the heat input capacity level at or above which would require their inclusion in the license; therefore, they are listed here for inventory purposes only.

Process Equipment

Equipment	Production Rate	Pollution Control Equipment	Install Date	Stack #
Ozone Destruction Unit #1	52 MMgal/day water	Thermo./catalyst	2014	3
Ozone Destruction Unit #2	52 MMgal/day water	Thermo./catalyst	2014	3

C. Definitions

Distillate Fuel means the following:

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

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

An engine is not a non-road (portable) engine if it remains or will remain at a location for more than 12 consecutive months or for a shorter period of time if sited at a seasonal source. A seasonal source is a source that remains in a single location for two years or more and which operates for fewer than 12 months in a calendar year. If an engine operates at a

seasonal source for one entire season, the engine does not meet the criteria of a non-road (portable) engine and is subject to applicable stationary engine requirements.

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

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.

The application for PWD does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of currently licensed emission units only 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

With the operating hours restriction on the generators, the facility is licensed as follows:

- As a synthetic minor source of air emissions for criteria pollutants, because PWD is subject to license restrictions that keep facility emissions below major source thresholds for NO_x; 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 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. Facility Description

The Portland Water District's Sebago Lake Water Treatment Facility provides water for household use to customers in the Greater Portland area. Water is drawn from Sebago Lake

through inlet points 80 feet beneath the lake's surface. The water passes through screens to filter out suspended material and then through contact tanks where ozone gas is bubbled into the water. The ozone serves as the primary treatment for viruses and giardia (a type of parasite) as ozone reacts in water to destroy these pathogens to a level that meets EPA standards for safe drinking water. As of April 2014, UV reactors are also used to meet additional primary drinking water regulations associated to the removal of cryptosporidium (another type of parasite). PWD then applies sodium hypochlorite and aqua ammonia for secondary disinfection, sodium hydroxide and zinc orthophosphate for pH and corrosion control, and fluoride to promote dental health.

C. Generators #1 and #2

PWD operates Generators #1 and #2. The generators are generator sets with each gen set consisting of an engine and an electrical generator. The generators have engines rated at 10.1 MMBtu/hr, which fire distillate fuel. Generators #1 and #2 were manufactured in 1992 and installed in 1993**.**

Generator #1 was converted to a non-emergency use generator, with a yearly operation limit of 500 hours, in license amendment A-559-71-H-A (2/10/2020). PWD installed an oxidation catalyst on Generator #1 in April 2020. The catalyst system is designed to achieve a 70%+ reduction in carbon monoxide (CO) emissions. The system is also equipped with pre- and post-catalyst test ports for emissions testing as well as a continuous parameter monitoring system (CPMS). PWD also installed a closed crankcase ventilation system on Generator #1, which prevents crankcase emissions to the atmosphere.

Generator #2 is an emergency generator limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. There is no limit on emergency operation.

1. BPT Findings

The BPT emission limits for the generators are based on the following:

$PM/PM_{10}/PM_{2.5}$	–	0.12 b/MMBtu from 06-096 C.M.R. ch. 103
SO_2	–	Combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
NO_x	–	3.2 lb/MMBtu from AP-42 Table 3.4-1 dated 10/96
CO	–	0.255 lb/MMBtu from AP-42 Table 3.4-1 dated 10/96 and based on 70% control of the emission rate
VOC	–	0.09 lb/MMBtu from AP-42 Table 3.4-1 dated 10/96
Visible Emissions	–	06-096 C.M.R. ch. 101

The BPT emission limits for the generators are the following:

Unit	Pollutant	lb/MMBtu
Generator #1	PM	0.12
Generator #2	PM	0.12

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)
Generator #1	1.21	1.21	1.21	0.02	32.32	2.58	0.91
Generator #2	1.21	1.21	1.21	0.02	32.32	8.59	0.91

Visible emissions from Generators #1 and #2 shall each not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time PWD shall either meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard.

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

Use of the work practice standards and alternative visible emissions standard in lieu of the normal operating standard is limited to no more than once per day.

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

2. Chapter 169

Generators #1 and #2 were installed prior to the effective date of *Stationary Generators*, 06-096 C.M.R. ch. 169 and is therefore exempt from this rule pursuant to section 1.

3. New Source Performance Standards (NSPS)

Due to the dates of manufacture of the compression ignition engines listed above, the engines are not subject to the New Source Performance Standards (NSPS) *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE),* 40 C.F.R. Part 60, Subpart IIII since the units were manufactured prior to April 1, 2006. [40 C.F.R. § 60.4200]

4. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart ZZZZ – Generator #1 (Non-emergency Engine)

   National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63, Subpart ZZZZ is applicable to Generator #1. Generator #1 is considered an existing, non-emergency stationary reciprocating internal combustion engine located at an area HAP source and is not subject to New Source Performance Standards regulations. [40 C.F.R. § 63.6585]

   A summary of the currently applicable federal 40 C.F.R. Part 63, Subpart ZZZZ requirements for Generator #1 is listed below.

   a. Operation Requirements [40 C.F.R. § 63.6603 and Tables 2b and 2d]

      (1) Limit concentration of CO in the exhaust to 23 ppmvd at 15% O_2 or reduce CO emissions by 70% or more (Table 2d);
      (2) Maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water from the pressure drop across the catalyst that was measured during the initial performance test (Table 2b); and
      (3) Maintain the temperature of the exhaust so that the catalyst inlet temperature is 450 ºF – 1,350 ºF. (Table 2b)

      Note: PWD installed an oxidation catalyst on Generator #1 in April 2020.

   b. Crankcase Filtration
      PWD shall operate on Generator #1 either a closed crankcase ventilation system that prevents crankcase emissions from being emitted to the atmosphere or an open crankcase filtration emission control system that reduces emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates, and metals. [40 C.F.R. § 63.6625(g)] PWD installed a closed crankcase ventilation system on Generator #1 in April 2020.

   c. Continuous Parameter Monitoring System (CPMS)
      (1) PWD shall install, operate, and maintain a CPMS on Generator #1. [40 C.F.R. § 63.6625(b)(2)] PWD installed a CPMS on Generator #1 in April 2020.
      (2) PWD shall prepare a site-specific monitoring plan for the CPMS that addresses the requirements outlined in 40 C.F.R. § 63.6625(b)(1). [40 C.F.R. § 63.6625(b)(1)]
      (3) The CPMS shall be continuously operated in accordance with the site-specific monitoring plan at all times that Generator #1 is operating except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities. [40 C.F.R. § 63.6635(b)]
      (4) The CPMS shall collect data at least once every 15 minutes. [40 C.F.R. § 63.6625(b)(3)]
      (5) The minimum tolerance for a CPMS measuring temperature is 5 ºF (2.8 ºC) or 1% of the measurement range, whichever is larger. [40 C.F.R. § 63.6625(b)(4)]

(6) At least annually, PMS shall conduct a CPMS equipment performance evaluation or system accuracy audit. [40 C.F.R. § 63.6625(b)(5)]
(7) PWD shall conduct a performance evaluation of the CPMS in accordance with their site-specific monitoring plan. [40 C.F.R. § 63.6625(b)(6)]
(8) PWD shall conduct performance tests every 8,760 hours or 3 years, whichever comes first. [40 C.F.R. § 63.6615 and Table 3]
(9) PWD shall monitor the catalyst inlet temperature and reduce this data to 4-hour rolling averages to demonstrate compliance with the limitations on the catalyst inlet temperature range. [40 C.F.R. § 63.6640(a) and Table 6]

d. Performance Tests
(1) PWD shall conduct performance tests on Generator #1 every 8,760 hours of operation or 3 years, whichever comes first. (Due to the limit on hours of operation, the 3 years will always come first.)
[40 C.F.R. § 63.6640(a), Table 3, and Table 6]
(2) PWD shall conduct three separate test runs for each performance test. Each test run must be at least one hour, unless otherwise specified.
[40 C.F.R. § 63.6620(d)]
(3) During a performance test, the facility must establish the pressure drop across the catalyst to be used to demonstrate compliance per the CPMS.
[40 C.F.R. § 63.6630(b) and Table 2b]
(4) If the facility changes the catalyst, PWD shall reestablish the values of the operating parameters measured during the initial performance test. In order to reestablish the operating parameters, the facility shall conduct a performance test to demonstrate that the required emission limitation is being met.
[40 C.F.R. § 63.6640(b)]
(5) PWD shall submit to the Department for approval a performance test protocol, as outlined in the Department's Performance Testing Guidance, at least 30 days prior to the scheduled date of the performance test. [06-096 C.M.R. ch. 115, BPT] The Department's Performance Testing Guidance is available online at https://www.maine.gov/dep/air/emissions/testing.html.

e. Ultra-Low Sulfur Diesel Fuel Requirement
The diesel fuel fired in Generator #1 shall not exceed 15 ppm sulfur (0.0015% sulfur) by weight. [40 C.F.R. § 63.6604(a)]

f. General Requirement to Minimize Emissions
(1) At all times PWD shall operate and maintain Generator #1 and associated air pollution control equipment and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions.
[40 C.F.R. § 63.6605(b)]
(2) PWD shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [40 C.F.R. §63.6625(h)]

g. Reporting

PWD shall submit to the Department and EPA all reports required by Subpart ZZZZ including, but not limited to, the following:

(1) Notification of Intent to conduct a performance test at least 60 days before a performance test is scheduled to begin. [40 C.F.R. § 63.6645(g)]

(2) Semiannual Compliance Reports shall cover the period between January 1 and June 30 or July 1 through December 31 of each year and shall be postmarked by July 31 or January 31 as applicable. The Semiannual Compliance Report shall include the following information:

(i) Company name and address;

(ii) Statement by a responsible official, with the official's name, title, and signature, certifying the accuracy of the content of the report;

(iii) Date of report and beginning and ending dates of the reporting period;

(iv) If there was a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.6605(b), including actions taken to correct a malfunction.;

(v) If there are no deviations from any applicable emission or operating limitations, a statement that there were no deviations from the emission or operating limitations during the reporting period;

(vi) If there were no periods during which the continuous monitoring system (CMS), i.e. CPMS, was out-of-control, as specified in § 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period; and

(vii) If there were periods of deviation from an emission or operating limitation occurring where the CPMS is used to comply with the emission and operating limitation, the Semiannual Compliance Report shall also include the following information:

1. The date and time that each malfunction started and stopped;
2. The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks;
3. The date, time, and duration that each CMS was out-of-control, including the information in § 63.8(c)(8);
4. The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period;
5. A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period;

6. A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, or other known causes, and other unknown causes;
7. A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the generator during that reporting period;
8. An identification of each parameter and pollutant that was monitored;
9. A brief description of stationary RICE (Generator #1);
10. A brief description of the CMS;
11. The date of the last CMS certification or audit; and
12. A description of any changes in CMS, processes, or controls since the last reporting period.

[40 C.F.R. § 63.6650 and Table 7]

h. Record Keeping

PWD shall keep all records required by Subpart ZZZZ including, but not limited to, the following:

(1) A copy of each notification and report that was submitted to comply with Subpart ZZZZ, including all supporting documentation;
(2) Records of the occurrence and duration of each malfunction of the engine, pollution control equipment, or monitoring equipment;
(3) Records of the occurrence and duration of each deviation;
(4) Records of performance tests and performance evaluations;
(5) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions taken to restore normal operation;
(6) Monitoring data from the CPMS; and
(7) Records of maintenance conducted on Generator #1 and associated control equipment to demonstrate the equipment was operated and maintained according to the maintenance plan.

[40 C.F.R. § 63.6655]

5. National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart ZZZZ - Generator #2 (Emergency Engine)

Generator #2 is subject to 40 C.F.R. Part 63, Subpart ZZZZ. Generator #2 is considered an existing, emergency stationary reciprocating internal combustion engine located at an area HAP source and is not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE*) specifically does not exempt these units from the federal requirements. [40 C.F.R. § 63.6585]

A summary of the currently applicable federal 40 C.F.R. Part 63, Subpart ZZZZ requirements for Generator #2 is listed below.

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 63, Subpart ZZZZ, a stationary reciprocating internal combustion engine (RICE) is considered an **emergency** stationary RICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under 40 C.F.R. Part 63, Subpart ZZZZ, resulting in the engine being subject to requirements applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

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

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

(2) Non-Emergency Situation Operation

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

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

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

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

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

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

(1) Operation and Maintenance Requirements

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

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

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

(2) Optional Oil Analysis Program

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

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

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

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

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

D. Ozone Generation and Destruction Systems

The PWD generates its own ozone for use in the water treatment process. The original air-fed Ozone Generation System was replaced in 2014 with a gaseous oxygen-fed system. The gas feed system starts with liquid oxygen, stored outside the facility in bulk tanks, which is then converted to gaseous oxygen (99% oxygen) by evaporators. The gaseous oxygen is then fed underground into the treatment facility and piped to the ozone generators. Inside the ozone generator, high voltage, low amperage electricity splits some of the oxygen (O_2) molecules in the gaseous oxygen. A percentage of the free oxygen atoms generated then bond with other, non-split O_2 molecules that are present, forming ozone (O_3). Approximately 5 to 12% of the volume of gaseous oxygen that passes through the ozone generator becomes ozone. Approximately 2% nitrogen is added to the gas flow mix as a lubricant, which aids in the efficiency of the ozone production process by offsetting the cold and dry conditions of the oxygen being fed into the generator. The nitrogen and gaseous oxygen is fed to the ozone generator which supplies the electrical current to form ozone gas. After the ozone gas is formed it is then carried through a piping system in a water solution. The side stream pumps create the flow to pull the ozone gas from the generator and inject it into ozone contact tanks where the ozone disinfection process takes place. Most of this ozone (about >95%) is efficiently dissolved into the water in the contact

tanks. A constant vacuum is maintained on the air space above the waterline in the contact tank to draw leftover oxygen and unreacted ozone from the tank. This vacuum also prevents dissolved ozone from entering the work space above the ozone contact tanks.

From there, the excess oxygen/ozone gas is pulled through the Ozone Destruction System by off-gas fans, which applies heat and subjects the gas to magnesium oxide and aluminum oxide particles. This process destroys any remaining ozone that did not enter the water. Ozone concentrations at the outlet of the Ozone Destruction System are less than 0.1 parts per million by volume (ppmv). The PWD shall operate the Ozone Destruction Units to treat all ozonated air before it is released to the atmosphere.

As long as PWD performs only the following functions of disinfecting, softening, filtration, flocculation, stabilization, taste and odor control, clarification, carbonation, sedimentation, and neutralization, the ozonation equipment and the water and wastewater treatment units are considered insignificant activates pursuant to 06-096 C.M.R. ch. 115, Appendix B §§ A.61 and B.16.

E. General Process Emissions

Visible emissions from any general process source shall not exceed 20% opacity on a six-minute block average basis.

F. Fugitive Emissions

PWD 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.

PWD 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.

G. 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 Generator #1 for 500 hrs/yr and operating Generator #2 for 100 hrs/yr.

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
Generator #1	0.3	0.3	0.3	--	8.1	0.6	0.2
Generator #2	0.1	0.1	0.1	--	1.6	0.4	--
Total TPY	**0.4**	**0.4**	**0.4**	**--**	**9.7**	**1.0**	**0.2**

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

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 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 PWD 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-559-71-I-R 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]

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

SPECIFIC CONDITIONS

(17) **Generators #1 and #2**

A. Generators #1 and #2 are licensed to fire distillate fuel. The fuel sulfur content shall be limited to 0.0015% sulfur by weight. Compliance shall be demonstrated by fuel delivery receipts from the supplier, fuel supplier certification, certificate of analysis, or testing of the fuel in the tank on-site. [06-096 C.M.R. ch. 115, BPT]

B. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
Generator #1	PM	0.12	06-096 C.M.R. ch. 103, § (2)(B)(1)(a)
Generator #2	PM	0.12	06-096 C.M.R. ch. 103, § (2)(B)(1)(a)

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

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #1	1.21	1.21	1.21	0.02	32.32	2.58	0.91
Generator #2	1.21	1.21	1.21	0.02	32.32	8.59	0.91

D. Visible Emissions

Visible emissions from Generators #1 and #2 shall each not exceed 20% opacity on a six-minute block average basis except for periods of startup, during which time PWD shall either meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard.

1. The duration of the startup shall not exceed 30 minutes per event;
2. Visible emissions shall not exceed 50% opacity on a six-minute block average basis; and
3. PWD shall keep records of the date, time, and duration of each startup.

Use of the work practice standards and alternative visible emissions standard in lieu of the normal operating standard is limited to no more than once per day.

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

[06-096 C.M.R. ch. 101, § 4(A)(4)]

E. Generator #1 shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following: [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. Operation Requirements [40 C.F.R. § 63.6603 and Tables 2b and 2d]

   a. Limit concentration of CO in the exhaust to 23 ppmvd at 15% O_2 or reduce CO emissions by 70% or more (Table 2d);
   b. Maintain the oxidation catalyst so that the pressure drop across the catalyst does not change by more than two inches of water from the pressure drop across the catalyst that was measured during the initial performance test (Table 2b); and
   c. Maintain the temperature of the exhaust so that the oxidation catalyst inlet temperature is 450 ^{o}F – 1,350 ^{o}F. (Table 2b)

2. Crankcase Filtration
   PWD shall operate on Generator #1 either a closed crankcase ventilation system that prevents crankcase emissions from being emitted to the atmosphere or an open crankcase filtration emission control system that reduces emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates, and metals. [40 C.F.R. § 63.6625(g)] PWD installed a closed crankcase ventilation system on Generator #1 in April 2020.

3. Continuous Parameter Monitoring System (CPMS)

   a. PWD shall install, operate, and maintain a CPMS on Generator #1. [40 C.F.R. § 63.6625(b)(2)] PWD installed a CPMS on Generator #1 in April 2020.
   b. PWD shall prepare a site-specific monitoring plan for the CPMS that addresses the requirements outlined in 40 C.F.R. § 63.6625(b)(1). [40 C.F.R. § 63.6625(b)(1)]
   c. The CPMS shall be continuously operated in accordance with the site-specific monitoring plan at all times that Generator #1 is operating except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities. [40 C.F.R. § 63.6635(b)]
   d. The CPMS shall collect data at least once every 15 minutes. [40 C.F.R. § 63.6625(b)(3)]
   e. The minimum tolerance for a CPMS measuring temperature is 5 ^{o}F (2.8 ^{o}C) or 1% of the measurement range, whichever is larger. [40 C.F.R. § 63.6625(b)(4)]
   f. PMS shall conduct, at least annually, a CPMS equipment performance evaluation or system accuracy audit. [40 C.F.R. § 63.6625(b)(5)]
   g. PWD shall conduct a performance evaluation of the CPMS in accordance with their site-specific monitoring plan. [40 C.F.R. § 63.6625(b)(6)]
   h. PWD shall conduct performance tests every 8,760 hours or 3 years, whichever comes first. [40 C.F.R. § 63.6615 and Table 3]

i. PWD shall monitor the catalyst inlet temperature and reduce this data to 4-hour rolling averages to demonstrate compliance with the limitations on the catalyst inlet temperature range. [40 C.F.R. § 63.6640(a) and Table 6]

4. Performance Tests

a. PWD shall conduct performance tests on Generator #1 every 8,760 hours of operation or 3 years, whichever comes first. (Due to the limit on hours of operation, the 3 years will always come first.)
[40 C.F.R. § 63.6640(a), Table 3, and Table 6]
b. PWD shall conduct three separate test runs for each performance test. Each test run must be at least 1 hour, unless otherwise specified.
[40 C.F.R. § 63.6620(d)]
c. During a performance test the facility must establish the pressure drop across the catalyst to be used to demonstrate compliance per the CPMS.
[40 C.F.R. § 63.6630(b) and Table 2b]
d. If the facility changes the catalyst, PWD shall reestablish the values of the operating parameters measured during the initial performance test. In order to reestablish the operating parameters, the facility shall conduct a performance test to demonstrate that the required emission limitation is being met.
[40 C.F.R. § 63.6640(b)]
e. PWD shall submit to the Department for approval a performance test protocol, as outlined in the Department's Performance Testing Guidance, at least 30 days prior to the scheduled date of the performance test. [06-096 C.M.R. ch. 115, BPT] The Department's Performance Testing Guidance is available online at:
https://www.maine.gov/dep/air/emissions/testing.html

5. Ultra-Low Sulfur Diesel Fuel Requirement

The diesel fuel fired in Generator #1 shall not exceed 15 ppm sulfur (0.0015% sulfur) by weight. [40 C.F.R. § 63.6604(a)]

6. General Requirement to Minimize Emissions

a. At all times PWD shall operate and maintain Generator #1 and associated air pollution control equipment and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions.
[40 C.F.R. § 63.6605(b)]
b. PWD shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [40 C.F.R. §63.6625(h)]

7. Reporting
PWD shall submit to the Department and EPA all reports required by Subpart ZZZZ including, but not limited to, the following:

a. Notification of Intent to conduct a performance test at least 60 days before a performance test is scheduled to begin. [40 C.F.R. § 63.6645(g)]
b. Semiannual Compliance Reports shall cover the period between January 1 and June 30 or July 1 through December 31 of each year and shall be postmarked by July 31 or January 31 as applicable. The Semiannual Compliance Report shall include the following information:

(i) Company name and address;
(ii) Statement by a responsible official, with the official's name, title, and signature, certifying the accuracy of the content of the report;
(iii) Date of report and beginning and ending dates of the reporting period;
(iv) If there was a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.6605(b), including actions taken to correct a malfunction.;
(v) If there are no deviations from any applicable emission or operating limitations, a statement that there were no deviations from the emission or operating limitations during the reporting period;
(vi) If there were no periods during which the continuous monitoring system (CMS), i.e. CPMS, was out-of-control, as specified in § 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period; and
(vii) If there were periods of deviation from an emission or operating limitation occurring where the CPMS is used to comply with the emission and operating limitation, the Semiannual Compliance Report shall also include the following information:

a) The date and time that each malfunction started and stopped;
b) The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks;
c) The date, time, and duration that each CMS was out-of-control, including the information in § 63.8(c)(8);
d) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period;

e) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period;
f) A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, or other known causes, and other unknown causes;
g) A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the generator during that reporting period;
h) An identification of each parameter and pollutant that was monitored;
i) A brief description of stationary RICE (Generator #1);
j) A brief description of the CMS;
k) The date of the last CMS certification or audit; and
l) A description of any changes in CMS, processes, or controls since the last reporting period.

[40 C.F.R. § 63.6650 and Table 7]

8. Record Keeping
PWD shall keep all records required by Subpart ZZZZ including, but not limited to, the following:

a. A copy of each notification and report that was submitted to comply with Subpart ZZZZ, including all supporting documentation;
b. Records of the occurrence and duration of each malfunction of the engine, pollution control equipment, or monitoring equipment;
c. Records of the occurrence and duration of each deviation;
d. Records of performance tests and performance evaluations;
e. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions taken to restore normal operation;
f. Monitoring data from the CPMS; and
g. Records of maintenance conducted on Generator #1 and associated control equipment to demonstrate the equipment was operated and maintained according to the maintenance plan.

[40 C.F.R. § 63.6655]

F. Generator #2 shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following: [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. PWD shall meet the following operational limitations for the compression ignition emergency engine:

a. Change the oil and filter every 500 hours of operation or annually, whichever comes first;

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

Records shall be maintained documenting compliance with the operational limitations.

[40 C.F.R. § 63.6603(a) and Table 2(d); and 06-096 C.M.R. ch. 115]

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

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

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

a. As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise to supply power as part of a financial arrangement with another entity). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written logs) of all engine operating hours. [40 C.F.R. § 63.6640(f) and 06-096 C.M.R. ch. 115]

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

5. Operation and Maintenance
The engine shall be operated and maintained according to the manufacturer's emission-related written instructions, or PWD shall develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the

engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]

PWD shall have available for review by the Department a copy of the manufacturer's emission-related written instructions for engine operation and maintenance. [06-096 C.M.R. ch. 115, BPT]

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

(18) **Ozone Destruction Units**

A. Portland Water District shall operate the Ozone Destruction Units to treat all ozonated air before it is released to the atmosphere.

B. As long as PWD performs only the following functions of disinfecting, softening, filtration, flocculation, stabilization, taste and odor control, clarification, carbonation, sedimentation, and neutralization, the ozonation equipment and the water and wastewater treatment units are considered insignificant activates pursuant to 06-096 C.M.R. ch. 115, Appendix B §§ A.61 and B.16.

[06-096 CMR 115, BPT]

(19) **General Process Sources**

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

(20) **Fugitive Emissions**

A. PWD 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. PWD shall not cause or allow visible emissions within 20 feet of ground level, measured as any level of opacity and not including water vapor, beyond the legal boundary of the property on which such emissions occur. Compliance with this standard shall be determined pursuant to 40 C.F.R. Part 60, Appendix A, Method 22.

[06-096 C.M.R. ch. 101, § 4(C)]

(21) 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, PWD may be required to submit additional information. Upon written request from the Department, PWD shall provide information necessary to demonstrate 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 26th DAY OF JUNE, 2024.

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 22, 2024
Date of application acceptance: April 22, 2024

Date filed with the Board of Environmental Protection:

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

FILED

JUN 26, 2024

State of Maine
Board of Environmental Protection