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

DEPARTMENT ORDER

Oldcastle Lawn & Garden, Inc. **Androscoggin County** **Poland, Maine** **A-964-71-I-R/A**	**Departmental** **Findings of Fact and Order** **Air Emission License** **Renewal and Amendment**

FINDINGS OF FACT

After review of the air emission license amendment and 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

Oldcastle Lawn & Garden, Inc. (Oldcastle) has applied to renew their Air Emission License for the operation of emission sources associated with their garden mulch and amended soils manufacturing facility.

The equipment addressed in this license is located at 481 Springwater Road, Poland Spring, Maine.

Additionally, Oldcastle has requested an amendment to their license in order to make the following changes:

1. Removing the Hogzilla Grinder engine;
2. Removing the Extec Robotrac engine;
3. Removing the CEC Screen engine; and
4. Adding a new portable screening unit with associated engine, the McCloskey Trommel Engine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Engines

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity	Fuel Type	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.
Rotochopper Engine	6.5	560 kW	Distillate fuel	47.5	2019	2020
CBI AirMax	2.6	247 kW	Distillate fuel	19.1	1999	2017

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity	Fuel Type	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.
Edge 622 Screen Engine	1.3	130 kW	Distillate fuel	9.2	2019	2021
Komptech Screen Engine	1.1	110 kW	Distillate fuel	7.8	2014	2021
Phoenix 3300 Screen Engine	1.0	151 kW	Distillate fuel	7.5	2008	2008
McCloskey Trommel Engine *	1.3	174 HP	Distillate fuel	9.2	2022	2024
Edge Feeder Stacker Engine **	0.5	55 kW	Distillate fuel	3.8	2021	2021
*Hogzilla Grinder Engine ****	*6.2*	*N/A*	*Distillate fuel*	*45.0*	*2004*	*2007*
*Extec Robotrac Engine ****	*0.7*	*N/A*	*Distillate fuel*	*4.9*	*1997*	*2017*
*CEC Screen Engine ****	*0.8*	*N/A*	*Distillate fuel*	*6.0*	*2003*	*2003*

* This equipment is new to this license.

** The Edge Feeder Stacker Engine is part of a self-propelled unit which shall be utilized in different areas of the site and is therefore not required to be addressed in this Air Emission License. It is listed here for completeness purposes only.

*** This equipment has been removed from the facility.

Oldcastle 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, Oldcastle 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.

Oldcastle also has several small boilers, water heaters, and unit heaters not listed in the table above. 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, these small boilers, water heaters, and unit heaters are not addressed further in this license.

Oldcastle operates various material grinding and screening equipment which is driven by the engines listed above. This equipment does not have specific state or federal requirements but is still subject to general process emissions requirements such as those listed below.

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.

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

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

Pollutant	Current License (tpy)	Future License (tpy)	Net Change (tpy)	Significant Emission Levels
PM	3.6	1.3	-2.3	100
PM_{10}	3.6	1.3	-2.3	100
$PM_{2.5}$	3.6	1.3	-2.3	100
SO_2	0.1	0.1	0.0	100
NO_x	39.6	45.4	5.8	100
CO	18.8	9.8	-9.0	100
VOC	3.2	3.7	0.5	100

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

E. Facility Classification

With the annual fuel limit on the engines, the facility is licensed as follows:

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

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Process Description

Oldcastle manufactures garden mulch and amended soils from wood waste and other raw materials. The facility operates several pieces of equipment powered by on-board diesel engines to process the material. All of the equipment listed on the license is trailer mounted and portable. The units are routinely moved around the yard depending on the type of product being produced and the physical space available for storage piles.

Processing of the material can include any combination of the following: grinding, screening, conveying, dyeing, composting, mixing, and bagging. The facility is made up of a log area, an area in which the production takes place and the licensed equipment is located, and a large storage area for the finished products. The finished products are sold in either bagged form or in bulk.

C. Engines

Oldcastle operates the Rotochopper Engine, the CBI AirMax Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, the Phoenix 3300 Screen Engine, and the newly added McCloskey Trommel Engine as portable engines used to power the process equipment at the facility. The above listed engines have maximum heat input capacities of 6.5, 2.6, 1.3, 1.1, 1.0, and 1.3 MMBtu/hr, respectively, firing distillate fuel and were manufactured in 2019, 1999, 2019, 2014, 2008, and 2022, respectively. The fuel fired in the above engines combined shall be limited to 150,000 gallons/year on a calendar year total basis of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight). This fuel limit shall apply regardless of where the units are operated.

1. BPT and BACT Findings

The BACT emission limits for the McCloskey Trommel Engine and the BPT emission limits for the Rotochopper Engine, the CBI AirMax Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, and the Phoenix 3300 Screen Engine were based on the following:

Rotochopper Engine

$PM/PM_{10}/PM_{2.5}$	–	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 3.3-1 dated 10/96
CO	–	0.85 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96
VOC	–	0.09 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96
Visible Emissions	–	06-096 C.M.R. ch. 101

CBI AirMax Engine, Edge 622 Screen Engine, Komptech Screen Engine, Phoenix 3300 Screen Engine, and McCloskey Trommel Engine

$PM/PM_{10}/PM_{2.5}$	–	0.12 b/MMBtu from 06-096 C.M.R. ch. 115, BPT and BACT
SO_2	–	Combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
NO_x	–	4.41 lb/MMBtu from AP-42 Table 3.4-1 dated 10/96
CO	–	0.85 lb/MMBtu from AP-42 Table 3.4-1 dated 10/96
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 BACT and BPT emission limits for the engines are the following:

Unit	Pollutant	lb/MMBtu
Rotochopper Engine	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)
Rotochopper Engine	0.78	0.78	0.78	0.01	20.82	5.53	0.59
CBI AirMax Engine	0.31	0.31	0.31	0.01	11.54	2.49	0.94
Edge 622 Screen Engine	0.15	0.15	0.15	0.01	5.56	1.20	0.45
Komptech Screen Engine	0.13	0.13	0.13	0.01	4.71	1.02	0.38
Phoenix 3300 Screen Engine	0.12	0.12	0.12	0.01	4.53	0.98	0.37
McCloskey Trommel Engine	0.15	0.15	0.15	0.01	5.56	1.20	0.45

Visible emissions from the Rotochopper Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, the Phoenix 3300 Screen Engine, and the McCloskey Trommel Engine shall not exceed 20% opacity on a six-minute block average basis.

Visible emissions from the CBI AirMax Engine shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time Oldcastle 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. Oldcastle 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

The Rotochopper Engine, the CBI AirMax Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, the Phoenix 3300 Screen Engine, and the McCloskey Trommel Engine are not stationary units nor are they generators, therefore they are exempt from *Stationary Generators*, 06-096 C.M.R. ch. 169 pursuant to section 1.

3. New Source Performance Standards

The Rotochopper Engine, the CBI AirMax Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, the Phoenix 3300 Screen Engine, and the McCloskey Trommel Engine are <u>not</u> subject to *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines,* 40 C.F.R. Part 60, Subpart IIII.

The definition in 40 C.F.R. § 1068.30 states that a non-road engine is an internal combustion engine that meets certain criteria, including: "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." The regulation further states at 40 C.F.R. § 1068.30 that an engine is <u>not</u> a non-road 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 engine and is subject to applicable stationary engine requirements. [40 C.F.R. § 60.4200]

The Rotochopper Engine, the CBI AirMax Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, the Phoenix 3300 Screen Engine, and the McCloskey Trommel Engine are considered non-road engines, as opposed to stationary engines, since they are portable and will be moved to various sites with the facility.

4. National Emission Standards for Hazardous Air Pollutants

The Rotochopper Engine, the CBI AirMax Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, the Phoenix 3300 Screen Engine, and the McCloskey Trommel Engine are not subject to *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines,* 40 C.F.R. Part 63, Subpart ZZZZ because they are considered non-road engines, as opposed to a stationary engines.

D. Mulch Coloring

Oldcastle uses various mulch coloring to dye the finished product various colors. The safety data sheets for these colorings show the chemical make-up either has no volatiles or such a low amount to be below the insignificant thresholds in 06-096 C.M.R. ch. 115, and as such it is considered an insignificant activity.

E. Parts Washer

The parts washer was manufactured and installed in 2024 and has a design capacity of 15 gallons. The parts washer is subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130, and records shall be kept documenting compliance.

This equipment is exempt from *Industrial Cleaning Solvents*, 06-096 C.M.R. ch. 166 pursuant to Section (3)(B).

F. General Process Emissions

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

Visible emissions from any baghouse shall not exceed 10% on a six-minute block average basis.

G. Fugitive Emissions

Oldcastle 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.

Oldcastle 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.

H. Emission Statements

Oldcastle is subject to emissions inventory requirements contained in *Emission Statements*, 06-096 C.M.R. ch. 137. Oldcastle shall maintain the following records in order to comply with this rule:

1. The amount of distillate fuel fired in the Rotochopper Engine, the CBI AirMax Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, the Phoenix 3300 Screen Engine, and the McCloskey Trommel Engine (each) on a monthly basis;
2. The sulfur content of the distillate fuel fired in the Rotochopper Engine, the CBI AirMax Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, the Phoenix 3300 Screen Engine, and the McCloskey Trommel Engine; and
3. The amount and VOC content of solvent added to the parts washer.

Every third year, or as requested by the Department, Oldcastle shall report to the Department emissions of hazardous air pollutants as required pursuant to 06-096 C.M.R. ch. 137, § (3)(C). The next report is due no later than May 15, 2027, for emissions occurring in calendar year 2023. The Department will use these reports to calculate and invoice for the applicable annual air quality surcharge for the subsequent three billing periods. Oldcastle shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3).
[38 M.R.S. § 353-A(1-A)]

I. 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 firing a total of 150,000 gal/yr distillate fuel in the engines.

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
Combined Engines	1.3	1.3	1.3	0.1	45.4	9.8	3.7
Total TPY	**1.3**	**1.3**	**1.3**	**0.1**	**45.4**	**9.8**	**3.7**

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 the expected construction and operation of the proposed and licensed emission units. If the Department determines that any parameter (e.g., stack size, configuration, flow rate, emission rates, nearby structures, etc.) deviates from what was included in the application, the Department may require Oldcastle 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-964-71-I-R/A subject to the following conditions.

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

STANDARD CONDITIONS

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

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

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

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

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S. § 353-A. [06-096 C.M.R. ch. 115]

(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) Engines

A. Fuel Use

1. The Rotochopper Engine, the CBI AirMax Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, the Phoenix 3300 Screen Engine, and the McCloskey Trommel Engine are licensed to fire distillate fuel with a maximum sulfur content not to exceed 15 ppm (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 fuel in the tank on-site. [06-096 C.M.R. ch. 115, BACT/BPT]
2. Total fuel use for engines combined shall not exceed 150,000 gal/yr of distillate fuel, regardless of where the units are operated. Compliance shall be demonstrated by fuel records from the supplier showing the quantity and type of fuel delivered. Records of annual fuel use shall be kept on a monthly and calendar year basis**.** [06-096 C.M.R. ch. 115, BPT/BACT]

B. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
Rotochopper Engine	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/BACT]:

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)
Rotochopper Engine	0.78	0.78	0.78	0.01	20.82	5.53	0.59
CBI AirMax Engine	0.31	0.31	0.31	0.01	11.54	2.49	0.94
Edge 622 Screen Engine	0.15	0.15	0.15	0.01	5.56	1.20	0.45
Komptech Screen Engine	0.13	0.13	0.13	0.01	4.71	1.02	0.38
Phoenix 3300 Screen Engine	0.12	0.12	0.12	0.01	4.53	0.98	0.37
McCloskey Trommel Engine	0.15	0.15	0.15	0.01	5.56	1.20	0.45

D. Visible Emissions

Visible emissions from the Rotochopper Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, the Phoenix 3300 Screen Engine, and the McCloskey Trommel Engine shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(4)]

Visible emissions from CBI AirMax Engine shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time Oldcastle 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. Oldcastle 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.

(18) **Parts Washer**

A. Oldcastle shall keep records of the amount of solvent added to each parts washer. [06-096 C.M.R. ch. 115, BPT]

B. The following are exempt from the requirements of 06-096 C.M.R. ch. 130 [06-096 C.M.R. ch. 130]:

1. Solvent cleaners using less than two liters (68 oz.) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20 °C (68 °F);
2. Wipe cleaning; and,
3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.

C. The following standards apply to cold cleaning machines that are applicable sources under 06-096 C.M.R. ch. 130.

1. Oldcastle shall attach a permanent conspicuous label to each unit summarizing the following operational standards:
    a. Waste solvent shall be collected and stored in closed containers.

b. Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
c. Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
d. The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
e. Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the parts washer.
f. When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
g. Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.
h. Work area fans shall not blow across the opening of the parts washer unit.
i. The solvent level shall not exceed the fill line.

2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches.
3. The parts washer shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent.

[06-096 C.M.R. ch. 130]

(19) **General Process Sources**

A. 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)]

B. Visible emissions from any baghouse shall not exceed 10% on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(3)]

(20) **Fugitive Emissions**

A. Oldcastle 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. Oldcastle 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) **Annual Emission Statements**

A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, Oldcastle shall annually report to the Department, in a format prescribed by the Department, the information necessary to accurately update the State's emission inventory. The emission statement shall be submitted as specified by the date in 06-096 C.M.R. ch. 137.

B. Oldcastle shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:

1. The amount of distillate fuel fired in the Rotochopper Engine, the CBI AirMax Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, the Phoenix 3300 Screen Engine, and the McCloskey Trommel Engine (each) on a monthly basis;
2. The sulfur content of the distillate fuel fired in the Rotochopper Engine, the CBI AirMax Engine, the Edge 622 Screen Engine, the Komptech Screen Engine, the Phoenix 3300 Screen Engine, and the McCloskey Trommel Engine; and
3. The amount and VOC content of solvent added to the parts washer.

[06-096 C.M.R. ch. 137]

C. Every third year, or as requested by the Department, Oldcastle shall report to the Department emissions of hazardous air pollutants as required pursuant to 06-096 C.M.R. ch. 137, § (3)(C). The next report is due no later than May 15, 2027, for emissions occurring in calendar year 2026. Oldcastle shall pay the annual air quality surcharge, calculated by the Department based on these reported emissions of hazardous air pollutants, by the date required in Title 38 M.R.S. § 353-A(3).
[38 M.R.S. § 353-A(1-A)]

(22) 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, Oldcastle may be required to submit additional information. Upon written request from the Department, Oldcastle 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 24th 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: 2/28/24
Date of application acceptance: 3/4/24

Date filed with the Board of Environmental Protection:

This Order prepared by Chris Ham, Bureau of Air Quality.

FILED

JUN 25, 2024

State of Maine
Board of Environmental Protection