



DEPARTMENT ORDER

Bath Iron Works Corporation
Sagadahoc County
Bath, Maine
A-333-77-7-M

Departmental
Findings of Fact and Order
New Source Review
NSR #7

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

FACILITY	Bath Iron Works Corporation
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Modification
NAICS CODES	336611
NATURE OF BUSINESS	Shipbuilding and Repair
FACILITY LOCATION	Bath, Maine

B. NSR License Description

Bath Iron Works Corporation (BIW) has requested a New Source Review (NSR) license to replace the burners on Boilers #1, #2, #3, #4, and the North Boiler.

C. Emission Equipment

The following existing equipment is modified by this project:

Fuel Burning Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Stack #
Boiler #1	29.3	196 gal/hr	Distillate Fuel	2
		2,900 scf/hr	Natural Gas	
Boiler #2	29.3	196 gal/hr	Distillate Fuel	
		2,900 scf/hr	Natural Gas	
Boiler #3	29.3	196 gal/hr	Distillate Fuel	
		2,900 scf/hr	Natural Gas	

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Stack #
Boiler #4	25.1	167 gal/hr	Distillate Fuel	2
		2,500 scf/hr	Natural Gas	
North Boiler	29.3	196 gal/hr	Distillate Fuel	1a
		2,900 scf/hr	Natural Gas	

D. 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.

E. Application Classification

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

The application submitted by BIW does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements.

The proposed operation of the equipment will not cause any regulated NSR pollutant to be emitted at a rate higher than the equipment presently emits. Additionally, with the increased efficiency of the proposed burner system, total annual fuel use is expected to decrease, thereby likely lowering actual criteria pollutant emissions on an annual basis. As this replacement change is not expected to increase the actual emissions of any pollutant, this action is not a modification per 06-096 C.M.R. ch. 100.

Therefore, the NSR license is determined to be a minor revision under *Minor and Major Source Air Emission License Regulations* 06-096 Code of Maine Rules (C.M.R.) ch. 115. The procedures found in 06-096 C.M.R. ch. 115 can be utilized to process this application since the proposed revision not prohibited by the Part 70 air emission license. An application to incorporate the requirements of this NSR license into the Part 70 air emission license has been submitted to the Department.

II. BEST PRACTICAL TREATMENT (BPT)

A. Burner Replacement for Boilers #1, #2, #3, #4, and the North Boiler

BIW has requested in a letter to the Department dated May 21, 2024, to replace the burner assemblies on Boilers #1, #2, #3, #4, and the North Boiler with higher efficiency, low excess O₂ Limpfield burners. The new burners will allow the boilers to fire with lower excess O₂ by monitoring the flue gas from each boiler for O₂, CO, CO₂, and NO, and then modulating the burner dampers to maintain optimum combustion for each boiler's given load. This will allow the boilers to burn less fuel to meet the heating load demand. BIW provided documentation showing the replacement burners will not emit regulated NSR pollutants at rates higher than the boilers presently emit, and BIW has not requested a change in boiler emission rates.

B. Incorporation Into the Part 70 Air Emission License

Pursuant to *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140 § 1(C)(8), for a modification at the facility that has undergone NSR requirements or been processed through 06-096 C.M.R. ch. 115, the source must apply for an amendment to their Part 70 license within one year of commencing the proposed operations, as provided in 40 C.F.R. Part 70.5. An application to incorporate the requirements of this NSR license into the Part 70 air emission license has been submitted to the Department.

C. Annual Emissions

This license will not change the facility's licensed annual emissions.

III. AMBIENT AIR QUALITY ANALYSIS

BIW previously submitted an ambient air quality impact analysis outlined in air emission license A-333-77-3-A (dated June 13, 2014) demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (AAQS). An additional ambient air quality impact analysis is not required for this NSR license.

ORDER

The Department hereby grants New Source Review Minor Revision A-333-77-7-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the specific conditions below.

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.

SPECIFIC CONDITIONS

- (1) BIW is authorized to replace the burner assemblies on Boilers #1, #2, #3, #4, and the North Boiler with higher efficiency, low excess O₂ Limpsfield burners. [06-096 C.M.R. ch. 115, BPT]
- (2) 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, BIW may be required to submit additional information. Upon written request from the Department, BIW 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 11th DAY OF JULY, 2024.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for
MELANIE LOYZIM, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 5/21/24

Date of application acceptance: 5/23/24

Date filed with the Board of Environmental Protection:

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

FILED
JUL 11, 2024
State of Maine
Board of Environmental Protection