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

DEPARTMENT ORDER

| | |
|---|---|
| **International N&H USA, Inc.**<br>**Knox County**<br>**Rockland, Maine**<br>**A-366-70-K-R** | **Departmental**<br>**Findings of Fact and Order**<br>**Part 70 Air Emission License**<br>**Renewal** |

## FINDINGS OF FACT

After review of the Part 70 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

| | |
|---|---|
| FACILITY | International N&H USA, Inc. (IN&H) |
| LICENSE TYPE | Part 70 License Renewal |
| NAICS CODES | 311999, 325412 |
| NATURE OF BUSINESS | Refined Hydrocolloid Products |
| FACILITY LOCATION | Crocketts Point, Rockland |

In November 2023, Dupont Nutrition USA, Inc. changed its name to International N&H USA, Inc. (IN&H). IN&H is a manufacturer of carrageenan, clarified locust bean gum, and other hydrocolloids used mostly as food additives. IN&H also manufactures agarose for use in molecular biology.

IN&H has the potential to emit more than 100 tons per year (tpy) of nitrogen oxides ($NO_x$) and more than 50 tpy of volatile organic compounds (VOC); therefore, the source is classified as a major source for criteria pollutants.

IN&H does not have the potential to emit 10 tpy or more of a single hazardous air pollutant (HAP) or 25 tpy or more of combined HAP; therefore, the source is classified as an area source for HAP.

## B. Emission Equipment

The following emission units are addressed by this Part 70 License:

### Boilers

| Equipment (Asset #) | Maximum Heat Input Capacity (MMBtu/hr) | Max. Firing Rate | Fuel Type, % sulfur | Install. Date | Stack # |
|---|---|---|---|---|---|
| Boiler #3 (E9030) | 85.6 | 83,107 scf/hr<br>611 gal/hr | natural gas, negligible<br>distillate fuel, 0.0015% | 1966 | 5-1 |
| Boiler #4 (E9040) | 48.6 | 47,184<br>347 | natural gas, negligible<br>distillate fuel, 0.0015% | 1965 | 5-1 |
| Boiler #5 (E9050) | 48.4 | 46,990<br>346 | natural gas, negligible<br>distillate fuel, 0.0015% | 1963 | 5-1 |

### Emergency Engines

| Equipment (Asset #) | Maximum Heat Input Capacity (MMBtu/hr) | Max. Firing Rate (gal/hr) | Fuel Type | Manf. Date |
|---|---|---|---|---|
| EU#23 B5 Generator (E9700) | 6.0 | 43.8 | distillate fuel | pre-1993 |
| EU#26 B15 Generator (E3994) | 1.5 | 11.2 | distillate fuel | 1994 |
| EU#27 B2 Generator (E2980) | 6.0 | 43.8 | distillate fuel | 1976 |
| Fire Pump | 0.3 | 2.2 | distillate fuel | 1997 |

## Process Equipment

| Equipment (Asset #) | Pollution Control Equipment | Exhaust ID |
|---|---|---|
| #1, Lime Unloading (E3205) | Baghouse | 15-1 |
| #3, Weed Cleaning System (E3391D) | Baghouse | 15-2 |
| #4, Perlite Unloading (E1221) | Baghouse | 1A-1 |
| #5, Cook Vent Filtration System (E1239) | Cyclone | 1A-3 |
| #6, FID Hydrocolloids Isopropanol Process (E2501, E2905, E2535) | Wet Scrubbers (2) | 2-2, 2-9, 2-6 |
| #7, Vacuum System for Belt Dryer Area (E2392) | Baghouse | 2-41 |
| #8, Grinder Feed System (E4000D) | Baghouse | 3A-4 |
| #9, A44 Grinder System (E4004) | Baghouse | 3A-5 |
| #10, ACM 60 Grinder System (E4134) | Baghouse | 3A-6 |
| #11, Tote Dumper System (E4518) | Baghouse | 3A-7 |
| #12, Blending Product Conveyor System (E4597) | Baghouse | 3A-3 |
| #13, Blending Area & Vacuum System (E45910) | Baghouse | 8A-1 |
| #14, Bulk Bag Filling System (E4114D) | Baghouse | 8A-2 |
| #16, Specialty Blender System (E45710) | Baghouse | 7-1 |
| #29, Blending & Packaging System (F4589) | Baghouses | 13-7 |
| #17, Agarose Isopropanol Process (C8803) | Wet Scrubber | 17-1 |
| #18, Agarose Grinding Process (X8324) | Baghouse | 17-10 |
| #19, Pilot Plant (E5910) | Wet Scrubber | 18-1 |
| #28, Blending Central Vacuum System (E45801) | Baghouse | 13-10 |
| #31, Specialty Blending Central Vacuum System (E45790) | Baghouses | 7A-3 |
| #30, Hydrated Lime Bulk Bag System (E1333) | Cartridge Filter | 1A-4 |

IN&H has additional insignificant activities which do not need to be listed in the emission equipment tables above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140.

## C. Acronyms and Units of Measure

| | |
|---|---|
| ASTM | American Society for Testing and Materials |
| BACT | Best Available Control Technology |
| BPT | Best Practical Treatment |
| C.F.R. | Code of Federal Regulations |
| C.M.R. | Code of Maine Rules |
| CAM | Compliance Assurance Monitoring |
| CEMS | Continuous Emissions Monitoring System |
| CO | carbon monoxide |
| COMS | Continuous Opacity Monitoring System |
| CPMS | Continuous Parameter Monitoring System |
| EPA or US EPA | United States Environmental Protection Agency |
| gal/hr | gallon per hour |
| HAP | Hazardous Air Pollutants |
| lb | pound |
| lb/hr | pounds per hour |
| lb/MMBtu | pounds per million British thermal units |
| M.R.S. | Maine Revised Statutes |
| MMBtu | million British thermal units |
| MMBtu/hr | million British thermal units per hour |
| NESHAP | National Emissions Standards for Hazardous Air Pollutants |
| $NO_x$ | nitrogen oxides |
| NSPS | New Source Performance Standards |
| NSR | New Source Review |
| $O_2$ | oxygen |
| PM | particulate matter less than 100 microns in diameter |
| $PM_{10}$ | particulate matter less than 10 microns in diameter |
| $PM_{2.5}$ | particulate matter less than 2.5 microns in diameter |
| RACT | Reasonably Available Control Technology |
| RICE | reciprocating internal combustion engine |

| | |
|---|---|
| $SO_2$ | sulfur dioxide |
| tpy | ton per year |
| VOC | volatile organic compounds |

## 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.

*Malfunction* means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

*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.

## 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 for IN&H does not include the licensing of increased emissions or the installation of new or modified equipment; therefore, the license is considered to be a Part 70 License renewal issued under *Part 70 Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 140.

## F. Facility Description

The two main systems at the plant are the hydrocolloids process and the agarose process. The hydrocolloids process manufactures carrageenan, clarified locust bean gum, and other hydrocolloids. Agarose is manufactured in the agarose process.

Hydrocolloid Process Description

The Hydrocolloids Process produces mainly carrageenan from seaweed. Different types of red seaweed are used to produce carrageenan with varying characteristics. The carrageenan process begins in Building 15 with weed cleaning. Here, the dried seaweed is chopped and sifted to remove extraneous material such as rocks and shells. The seaweed is then mixed with water and pumped to the pasting tanks.

In pasting, the mixture is heated to begin to extract the carrageenan. Process chemicals may be added to assist carrageenan extraction and modification. The material is held until modification and resting is complete.

The material is then pumped to Building 1 where it goes through a series of solids removal steps to remove sand and other small particles. This process involves shaker screens, hydroclones, centrifuges, and press filters. The filtrate is sent to evaporators in Building 2 where water is removed from the filtrate in a three-step evaporation process.

After evaporation, the filtrate is mixed with isopropyl alcohol (IPA), and a carrageenan precipitate is formed. The precipitate, or coagulant, is separated out of the alcohol/water solution. The alcohol/water solution is pumped to distillation where the alcohol is distilled out for reuse. The coagulant is slurried with a high concentration IPA in the wash tanks. After the wash tanks, the carrageenan alcohol mixture is pumped to a rotary screen where the IPA is again separated from the solid carrageenan. The liquid IPA flows to the high drain tank. The coagulant is further pressed to remove more alcohol and then dried.

In drying, vacuum dryers and a belt dryer are used. The vapors from the dryers pass to a vertical condenser containing coils fed with seawater. The condenser removes most of the liquid which goes to the distillation system. The remaining vapor goes to the Dryer Wet Scrubber.

The dried product is ground to a fine powder and sent to blending where it is formulated to customer specifications.

The same process is used to manufacture clarified locust bean gum and other hydrocolloids. Since the raw material for some of these other hydrocolloids comes pre-processed, the process for certain products begins with the filtration stages in Building 1 as described above. The remaining process is identical.

Agarose Process Description

Raw material for the production of agarose is agar. Agar is made from seaweed. The process begins by putting the agar into solution with water, heating it with steam, and adding chemicals to modify the agar. The modification involves a separation of agarose and agaropectin from the agar molecule. The solution is then neutralized with acetic acid.

After neutralization, the agaropectin is filtered out of solution using a filter press with a filter aid.

The solution is evaporated to reduce the volume and then combined with IPA to form a precipitate. The precipitate is washed several times with water and alcohol and pressed to remove as much liquid as possible. The alcohol and water solutions are distilled to recover the alcohol for reuse. The material is then dried using vacuum dryers and blended to customer specifications.

## G. General Facility Requirements

IN&H is subject to the following state and federal regulations listed below in addition to the regulations listed for specific units as described further in this license.

| Citation | Requirement Title |
|---|---|
| 06-096 C.M.R. ch. 101 | Visible Emissions Regulation |
| 06-096 C.M.R. ch. 102 | Open Burning |
| 06-096 C.M.R. ch. 103 | Fuel Burning Equipment Particulate Emission Standard |
| 06-096 C.M.R. ch. 105 | General Process Source Particulate Emission Standard |
| 06-096 C.M.R. ch. 106 | Low Sulfur Fuel Regulation |
| 06-096 C.M.R. ch. 109 | Emergency Episode Regulations |
| 06-096 C.M.R. ch. 110 | Ambient Air Quality Standards |
| 06-096 C.M.R. ch. 116 | Prohibited Dispersion Techniques |
| 06-096 C.M.R. ch. 134 | Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds |
| 06-096 C.M.R. ch. 137 | Emission Statements |
| 06-096 C.M.R. ch. 138 | Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides |
| 06-096 C.M.R. ch. 140 | Part 70 Air Emission License Regulations |
| 06-096 C.M.R. ch. 143 | New Source Performance Standards |
| 06-096 C.M.R. ch. 144 | National Emission Standards for Hazardous Air Pollutants |

| Citation | Requirement Title |
|---|---|
| 40 C.F.R. Part 63, Subpart ZZZZ | National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines |
| 40 C.F.R. Part 63, Subpart JJJJJJ | National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources |
| 40 C.F.R. Part 64 | Compliance Assurance Monitoring |
| 40 C.F.R. Part 70 | State Operating Permit Programs |

## II. BEST PRACTICAL TREATMENT (BPT) AND EMISSION STANDARDS

### 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 as well as for those sources located in designated non-attainment areas.

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

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

### B. Mandatory Greenhouse Gas (GHG) Reporting

Federal regulation *Mandatory Greenhouse Gas Reporting*, 40 C.F.R. Part 98, is applicable to some facilities as addressed in *General Provisions, Who must report?*, 40 C.F.R. § 98.2. These are not considered "applicable requirements" for the purposes of Part 70 licenses. Therefore, this information is presented for informational purposes only.

### C. Compliance Assurance Monitoring (CAM)

*Compliance Assurance Monitoring*, 40 C.F.R. Part 64 is applicable to units at major sources if the unit has emission limits, a control device to meet the limits, and pre-control emissions greater than 100% of the major source threshold.

This regulation's 40 C.F.R. § 64.2(b)(1)(vi) specifies the exemption from specific CAM requirements for any emission unit subject to emission limitations or standards for which a Part 70 air emission license specifies a continuous compliance determination method. Furthermore, 40 C.F.R. § 64.2(b)(1)(i) specifies the exemption from specific CAM requirements for any emission unit subject to emission limitations or standards in a NSPS

or NESHAP regulation proposed by the Administrator after November 15, 1990. [40 C.F.R. Part 64 § 64.2(b)]

The following table lists all the specific pollutants for each unit meeting CAM applicability criteria and the determination of the applicability of CAM requirements for each.

**40 C.F.R. Part 64 Applicability Table**

| Unit | Pollutant | CAM Required | Reason | Regulatory Authority |
|---|---|---|---|---|
| Boilers | $NO_x$ | No | Although combined emissions are greater than 100 tpy, the PTE for each individual boiler is less than 100 tpy. | 40 C.F.R. § 64.2(a)(3) |
| Process Equipment | $PM/PM_{10}$ | Yes | Baghouses and cartridge filters are used to limit emissions to a visible emissions standard.* | 40 C.F.R. § 64.2(a) |
| | VOC | Yes | Wet scrubbers are used to limit emissions to no more than 15% of uncontrolled emissions. | 40 C.F.R. § 64.2(a) |

* Due to the uncertainty involved in calculating the uncontrolled emissions from this equipment, it is unknown whether each process exceeds a potential to emit of more than 100 tpy of PM. However, IN&H has chosen to conservatively assume that they do and comply with CAM requirements for these units.

IN&H submitted a CAM plan for VOC and particulate matter from the facility's process equipment summarized below.

| Unit | Eligible Pollutant | Indicator | Recording Frequency |
|---|---|---|---|
| Process Equipment | $PM/PM_{10}$ | Bag Leak Detector Alarms | As occurs |
| | VOC | Scrubber Media Flowrate (gal/min) | Once per shift |

The CAM requirements are incorporated in this license.

## D. Fuel Sulfur Content Requirements

IN&H is licensed to fire distillate fuel. With limited exceptions, no person shall import, distribute, or offer for sale any distillate fuel with a sulfur content greater than 0.0015% by weight (15 ppm) pursuant to 38 M.R.S. § 603-A(2)(A)(3). Therefore, the distillate fuel purchased or otherwise obtained for use at this facility shall not exceed 0.0015% by weight (15 ppm).

## E. Boilers #3, #4, and #5

IN&H operates three boilers for facility heat and process steam requirements.

Boiler #3 (also known as Unit #20 or E9030) was manufactured by Union Iron Works in 1966 with a heat input capacity of 85.6 MMBtu/hr.

Boiler #4 (also known as Unit #21 or E9040) was manufactured by Union Iron Works in 1965 with a heat input capacity of 48.6 MMBtu/hr.

Boiler #5 (also known as Unit #22 or E9050) was manufactured by Union Iron Works in 1963 with a heat input capacity of 48.4 MMBtu/hr.

The boilers were all originally designed to fire #6 fuel oil. However, New Source Review license A-366-77-6-A (issued 3/26/14) addressed the conversion of the boilers from firing #6 fuel oil to firing natural gas or distillate fuel. With this conversion, the ability to fire #6 fuel oil was removed from the facility.

Emissions exit through a combined stack (Stack #5-1 or E9029), which has an inside diameter of 48 inches and a height of 131 feet above ground level.

1. Throughput Limit

   In order to allow for the use of either natural gas or distillate fuel in each boiler, IN&H is subject to a heat input limit (MMBtu/year) rather than fuel throughput limits (scf/year, gal/year). Fuel use for Boilers #3, #4, and #5 combined shall not exceed the equivalent of 1,400,000 MMBtu/year for all fuel combined on a 12-month rolling total basis. When converting fuel use to MMBtu, IN&H shall use a heating value of 0.14 MMBtu/gallon for distillate fuel and 0.00103 MMBtu/scf, or the actual heat content provided by the supplier, for natural gas.

2. Visible Emissions

   a. 06-096 C.M.R. ch. 101

      Boilers #3, #4, and #5 are subject to the following visible emissions standards pursuant to 06-096 C.M.R. ch. 101, § 4(D):

      > During periods of time when only natural gas is being fired in the boilers exhausting to Stack #5-1, visible emissions shall not exceed 10% opacity on a six-minute block average basis.

During periods of time when distillate fuel is being fired in any boiler exhausting to Stack #5-1, visible emissions shall not exceed 20% opacity on a six-minute block average basis.

b. 06-096 C.M.R. ch. 115, BACT

Boilers #3, #4, and #5 are subject to the following visible emissions standards established pursuant to 06-096 C.M.R. ch. 115, BACT in A-366-77-6-A (3/26/2014):

If any of IN&H's boilers are firing distillate fuel, the visible emissions from Stack #5-1 shall not exceed 20% opacity on a six-minute block average, except for no more than one (1) six (6) minute block average in a 3 hour period.

If natural gas is being fired in IN&H's boilers, visible emissions from Stack #5-1 shall not exceed 10% opacity on a six-minute block average basis, except for no more than one (1) six (6) minute block average in a 3 hour period.

c. Streamlining

The Department has determined that the visible emissions standards contained in 06-096 C.M.R. ch. 101 are more stringent than the other applicable limits listed above. Therefore, the visible emission limit has been streamlined to the more stringent limit, and only this more stringent limit shall be included in the Order section of this air emission license.

d. Compliance

The visible emission standards apply at all times including periods of startup and shutdown. IN&H shall conduct performance testing for visible emissions from Stack #2 using 40 C.F.R. Part 60, Appendix A, Method 9 annually with no more than 14 months between tests. During the performance test, at least one of the boilers must be started up firing distillate fuel. The initial test shall be performed no later than six months from the date of this license.

3. New Source Performance Standards (NSPS)

Due to their years when construction for the boilers commenced, none of the boilers are subject to the New Source Performance Standards (NSPS) titled *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 C.F.R. Part 60, Subpart Dc. These standards apply to steam generating units with a heat input capacity of 10 MMBtu/hr or more for which construction, modification, or reconstruction commenced after June 9, 1989.

4. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

Boilers #3, #4, and #5 are subject to *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJJ. These units are considered existing oil-fired boilers with a rating greater than 10 MMBtu/hr.

Applicable federal 40 C.F.R. Part 63, Subpart JJJJJJ requirements include the following. Additional rule information can be found on the following website: https://www.epa.gov/stationary-sources-air-pollution/compliance-industrial-commercial-and-institutional-area-source.

a. Work Practice Requirements

(1) Boiler Tune-Up Program

(i) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]

(ii) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. Boilers #3, #4, and #5 are existing oil-fired boilers with oxygen trim systems which maintain an optimum air-to-fuel ratio. The tune-up frequency for such boilers is every five years. [40 C.F.R. § 63.11223(a) and Table 2]

(iii) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:

1. As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]
2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F.R. § 63.11223(b)(2)]
3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
5. Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are

made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]

6. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 C.F.R. § 63.11223(b)(7)]

(iv) Tune-Up Report: A tune-up report shall be maintained onsite and submitted to the Department and/or EPA upon request. The report shall contain the following information:

1. The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;

2. A description of any corrective actions taken as part of the tune-up of the boiler; and

3. The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

(2) Compliance Report

For every five-year compliance period, IN&H shall prepare a compliance report by March 1st of the following year to document the information below for the five-year period. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

(i) Company name and address;

(ii) A statement of whether the source has complied with all the relevant requirements of this Subpart;

(iii) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;

(iv) The following certifications, as applicable:

1. "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
2. "No secondary materials that are solid waste were combusted in any affected unit."
3. "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and

shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

b. Recordkeeping

(1) Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJJ including the following [40 C.F.R. § 63.11225(c)]:
(i) Copies of notifications and reports with supporting compliance documentation;
(ii) Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
(iii) Records of the occurrence and duration of each malfunction of each applicable boiler; and
(iv) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

(2) Records shall be in a form suitable and readily available for expeditious review. Each record must be kept for 5 years following the date of each recorded action. Each record must be kept on-site or be accessible from a central location by computer or other means that instantly provides access at the site for at least 2 years after the date of each recorded action. The records may be maintained off-site for the remaining 3 years. [40 C.F.R. § 63.11225(d)] Note: Standard Condition (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ shall be streamlined to the more stringent six-year requirement.

5. $NO_x$ RACT

*Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides*, 06-096 C.M.R. ch. 138 ($NO_x$ RACT) is applicable to sources that had the potential to emit quantities of $NO_X$ equal to or greater than 100 tpy prior to 1995. Pursuant to 06-096 C.M.R. ch. 138, Boiler #3 is classified as a Mid-Size Boiler, and Boilers #4 and #5 are classified as Small Boilers.

A $NO_x$ RACT determination (A-366-72-H-A, 2/7/1996) was issued to the facility on February 7, 1996 (A-366-72-H-A). At that time, Boilers #3, #4, and #5 fired #6 fuel oil. Boiler #3 was subject to an alternative $NO_x$ RACT determination which required low $NO_x$ burners and an emission limit of 0.5 lb/MMBtu. In 2014, the boilers were converted to fire natural gas and distillate fuel. Since the conversion, Boiler #3 has been licensed below the $NO_x$ emission limit in 06-096 C.M.R. ch. 138, and an alternative RACT determination is no longer required. Boilers #4 and #5 are subject to annual

tune-up requirements. The $NO_x$ RACT requirements for all three boilers are incorporated in this renewal.

6. Emission Limits and Streamlining

For Boiler #3 firing natural gas, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested (* denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standards | Origin and Authority | Licensed Emission Limits |
|---|---|---|---|
| PM | 0.08 lb/MMBtu | 06-096 C.M.R. ch. 103, § 2(B)(1)(b) | 0.05 lb/MMBtu * |
| | 0.05 lb/MMBtu | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | |
| | 4.28 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 4.28 lb/hr |
| $PM_{10}$ | 4.28 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 4.28 lb/hr |
| $PM_{2.5}$ | 4.28 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 4.28 lb/hr **Enforceable by State-only** |
| $SO_2$ | 0.05 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.05 lb/hr |
| $NO_x$ | 0.17 lb/MMBtu | 06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016) | 0.17 lb/MMBtu |
| | 14.55 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016) | 14.55 lb/hr |
| CO | 6.98 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 6.98 lb/hr |
| VOC | 0.46 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.46 lb/hr |
| Visible Emissions | Addressed Previously | | |

For Boiler #3 firing distillate fuel, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested (* denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standards | Origin and Authority | Licensed Emission Limits |
|---|---|---|---|
| PM | 0.08 lb/MMBtu | 06-096 C.M.R. ch. 103, § 2(B)(1)(b) | 0.08 lb/MMBtu |
| | 6.85 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 6.85 lb/hr |
| $PM_{10}$ | 6.85 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 6.85 lb/hr |
| $PM_{2.5}$ | 6.85 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 6.85 lb/hr **Enforceable by State-only** |
| $SO_2$ | 43.11 lb/hr (based on 0.5% sulfur by weight) | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.13 lb/hr * |
| | 0.13 lb/hr (based on 0.0015% sulfur by weight) | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | |
| $NO_x$ | 0.30 lb/MMBtu | 06-096 C.M.R. ch. 138, § 3(B)(1) | 0.20 lb/MMBtu * |
| | 0.20 lb/MMBtu | 06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016) | |
| | 17.12 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016) | 17.12 lb/hr |
| CO | 3.06 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 3.06 lb/hr |
| VOC | 0.12 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.12 lb/hr |
| Visible Emissions | Addressed previously | | |

For Boiler #4 firing natural gas, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested (* denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standards | Origin and Authority | Licensed Emission Limits |
|---|---|---|---|
| PM | 0.12 lb/MMBtu | 06-096 C.M.R. ch. 103, § 2(B)(1)(a) | 0.05 lb/MMBtu * |
| | 0.05 lb/MMBtu | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | |
| | 2.43 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 2.43 lb/hr |
| $PM_{10}$ | 2.43 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 2.43 lb/hr |
| $PM_{2.5}$ | 2.43 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 2.43 lb/hr **Enforceable by State-only** |
| $SO_2$ | 0.03 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.03 lb/hr |
| $NO_x$ | 0.10 lb/MMBtu | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.10 lb/MMBtu |
| | 4.72 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 4.72 lb/hr |
| CO | 3.96 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 3.96 lb/hr |
| VOC | 0.26 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.26 lb/hr |
| Visible Emissions | Addressed previously | | |

For Boiler #4 firing distillate fuel, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested (* denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standards | Origin and Authority | Licensed Emission Limits |
|---|---|---|---|
| PM | 0.12 lb/MMBtu | 06-096 C.M.R. ch. 103, § 2(B)(1)(a) | 0.08 lb/MMBtu * |
| | 0.08 lb/MMBtu | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | |
| | 3.89 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 3.89 lb/hr |
| $PM_{10}$ | 3.89 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 3.89 lb/hr |
| $PM_{2.5}$ | 3.89 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 3.89 lb/hr **Enforceable by State-only** |
| $SO_2$ | 24.47 lb/hr (based on 0.5% sulfur by weight) | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.07 lb/hr * |
| | 0.07 lb/hr (based on 0.0015% sulfur by weight) | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | |
| $NO_x$ | 0.17 lb/MMBtu | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.17 lb/MMBtu |
| | 8.33 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 8.33 lb/hr |
| CO | 1.74 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 1.74 lb/hr |
| VOC | 0.07 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.07 lb/hr |
| Visible Emissions | Addressed previously | | |

For Boiler #5 firing natural gas, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested (* denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standards | Origin and Authority | Licensed Emission Limits |
|---|---|---|---|
| PM | 0.12 lb/MMBtu | 06-096 C.M.R. ch. 103, § 2(B)(1)(a) | 0.05 lb/MMBtu * |
| | 0.05 lb/MMBtu | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | |
| | 2.42 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 2.42 lb/hr |
| $PM_{10}$ | 2.42 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 2.42 lb/hr |
| $PM_{2.5}$ | 2.42 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 2.42 lb/hr **Enforceable by State-only** |
| $SO_2$ | 0.03 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.03 lb/hr |
| $NO_x$ | 0.17 lb/MMBtu | 06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016) | 0.17 lb/MMBtu |
| | 8.23 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016) | 8.23 lb/hr |
| CO | 3.95 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 3.95 lb/hr |
| VOC | 0.26 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.26 lb/hr |
| Visible Emissions | Addressed previously | | |

For Boiler #5 firing distillate fuel, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested (* denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standards | Origin and Authority | Licensed Emission Limits |
|---|---|---|---|
| PM | 0.12 lb/MMBtu | 06-096 C.M.R. ch. 103, § 2(B)(1)(a) | 0.08 lb/MMBtu * |
| | 0.08 lb/MMBtu | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | |
| | 3.87 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 3.87 lb/hr |
| $PM_{10}$ | 3.87 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 3.87 lb/hr |
| $PM_{2.5}$ | 3.87 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 3.87 lb/hr **Enforceable by State-only** |
| $SO_2$ | 24.37 lb/hr (based on 0.5% sulfur by weight) | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.07 lb/hr * |
| | 0.07 lb/hr (based on 0.0015% sulfur by weight) | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | |
| $NO_x$ | 0.17 lb/MMBtu | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.17 lb/MMBtu |
| | 8.30 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 8.30 lb/hr |
| CO | 1.73 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 1.73 lb/hr |
| VOC | 0.07 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | 0.07 lb/hr |
| Visible Emissions | Addressed previously | | |

7. Emission Limit Compliance Methods

Compliance with the emission limits associated with the boilers shall be demonstrated in accordance with the methods and frequencies indicated in the table below or other methods or frequencies as approved by the Department.

| Pollutant | Applicable Emission Limit | Compliance Method | Frequency |
|---|---|---|---|
| PM | lb/MMBtu | 40 C.F.R. Part 60, App. A, Method 5 | As requested |
| | lb/hr | | |
| $PM_{10}/PM_{2.5}$ | lb/hr | 40 C.F.R. Part 60, App. A, Method 5 or EPA Test Method 201 or 201A | As requested |
| $SO_2$ | lb/hr | 40 C.F.R. Part 60, App. A, Method 6 | As requested |
| $NO_X$ | lb/MMBtu | 40 C.F.R. Part 60, App. A, Method 7E | As requested |
| | lb/hr | 40 C.F.R. Part 60, App. A, Method 7E | As requested |
| CO | lb/hr | 40 C.F.R. Part 60, App. A, Method 10 | As requested |
| VOC | lb/hr | 40 C.F.R. Part 60, App. A, Method 25 or 25A | As requested |
| Visible Emissions | % opacity on a 6-minute block average basis | 40 C.F.R. Part 60, App. A, Method 9 | Annually |

8. Compliance Assurance Monitoring

CAM is not applicable to Boiler #3, #4, or #5.

9. Periodic Monitoring

IN&H shall record data and maintain records for the following periodic monitoring values for Boilers #3, #4, and #5 whenever the equipment is operating.

a. Hours of operation of each boiler on a monthly and calendar year total basis; [06-096 C.M.R. ch. 137]
b. Amount of natural gas (scf) fired in each boiler on a monthly and calendar year total basis; [06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014)]
c. Amount of distillate fuel (gallons) fired in each boiler on a monthly and calendar year total basis; [06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014)]
d. Sulfur content of the distillate fuel fired based on fuel receipts from the supplier; [06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016)]

e. The total heat input (MMBtu) for all boilers combined on a monthly and 12-month rolling total basis; [06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014)]
f. Dates of the annual tune-ups for Boilers #4 and #5; [06-096 C.M.R. ch. 138] and
g. Tune-up records for Boilers #4 and #5 including the tune-up procedure, an oxygen/carbon monoxide curve, and optimum excess oxygen setting. [06-096 C.M.R. ch. 138]

10. Parameter Monitors

There are no Parameter Monitors required for Boilers #3, #4, or #5.

11. CEMS and COMS

There are no CEMS or COMS required for Boilers #3, #4, or #5.

## F. Emergency Engines

IN&H operates four stationary emergency engines: three emergency generators and one emergency fire pump. The emergency generators are generator sets, with each gen set consisting of an engine and an electrical generator. EU#23 B5 Generator and EU#27 B2 Generator have engines rated at 6.0 MMBtu/hr each. The engine associated with EU#26 B15 Generator is rated at 1.5 MMBtu/hr. The Fire Pump is rated at 0.3 MMBtu/hr. All four emergency engines fire distillate fuel and were manufactured prior to 2002.

1. Visible Emissions

IN&H's stationary engines are each are subject to 06-096 C.M.R. ch. 101 and subject to the following standards.

Visible emissions from each emergency engine shall not exceed an opacity of 20% on a six-minute block average basis, except during periods of startup. During periods of startup, the engine must meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard. Use of the following work practice standards and alternative visible emissions standard in lieu of the normal operating visible emissions standard is limited to no more than once per day.

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. IN&H shall keep records of the date, time, and duration of each startup event.

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. *Stationary Generators*, 06-096 C.M.R. ch. 169

   Each of the emergency generators were licensed prior to the effective date of *Stationary Generators*, 06-096 C.M.R. ch. 169 and are therefore exempt from this rule pursuant to section 3(B).

3. New Source Performance Standards (NSPS)

   *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, 40 C.F.R. Part 60, Subpart IIII is not applicable to any of IN&H's emergency engines since they were all manufactured prior to April 1, 2006.

4. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

   *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* 40 C.F.R. Part 63, Subpart ZZZZ is applicable to the emergency engines. The units are considered existing, emergency stationary reciprocating internal combustion engines (RICE) at an area HAP source and are 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.

   a. Emergency Engine Designation and Operating Criteria

      Under 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 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.

IN&H's emergency engines shall be limited to the usage outlined in 40 C.F.R. § 63.6640(f) and therefore may be classified as 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 these engines to not be considered emergency engines 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
[40 C.F.R. § 63.6603(a) and Table 2(d)]

| | **Operating Limitations** |
|---|---|
| Compression ignition (distillate fuel) units:<br>**EU #23 B5 Generator**<br>**EU #26 B15 Generator**<br>**EU #27 B2 Generator**<br>**Fire Pump** | - Change oil and filter every 500 hours of operation or annually, whichever comes first;<br>- Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and<br>- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. |

The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or IN&H shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines 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
IN&H 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, IN&H 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 Requirement
A non-resettable hour meter shall be installed and operated on each 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 emergency engines, the units shall each 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

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

5. Emission Limits and Streamlining

For EU #23 B5 Generator, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested ("*" denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standards | Origin and Authority | Licensed Emission Limits |
|---|---|---|---|
| PM | 0.12 lb/MMBtu | 06-096 C.M.R. ch. 103, § 2(B)(1)(a) | 0.12 lb/MMBtu |
| | 0.72 lb/hr | 06-096 C.M.R. ch. 140, BPT (A-366-70-F-R, 9/26/2009) **Enforceable by State-only** | 0.72 lb/hr **Enforceable by State-only** |
| $PM_{10}$ | 0.72 lb/hr | 06-096 C.M.R. ch. 140, BPT (A-366-70-F-R, 9/26/2009) **Enforceable by State-only** | 0.72 lb/hr **Enforceable by State-only** |
| $PM_{2.5}$ | 0.72 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 0.72 lb/hr **Enforceable by State-only** |
| $SO_2$ | 0.01 lb/hr (based on 0.0015% sulfur by weight) | 06-096 C.M.R. ch. 140, BPT (A-366-70-G-R/A, 1/31/2018) **Enforceable by State-only** | 0.01 lb/hr **Enforceable by State-only** |
| $NO_x$ | 19.20 lb/hr | 06-096 C.M.R. ch. 140, BPT (A-366-70-F-R, 9/26/2009) **Enforceable by State-only** | 19.20 lb/hr **Enforceable by State-only** |
| CO | 5.10 lb/hr | 06-096 C.M.R. ch. 140, BPT (A-366-70-F-R, 9/26/2009) **Enforceable by State-only** | 5.10 lb/hr **Enforceable by State-only** |
| VOC | 0.54 lb/hr | 06-096 C.M.R. ch. 140, BPT (A-366-70-F-R, 9/26/2009) **Enforceable by State-only** | 0.54 lb/hr **Enforceable by State-only** |
| Visible Emissions | Addressed Previously | | |

For EU #26 B15 Generator, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested ("*" denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standard | Origin and Authority | Licensed Emission Limit |
|---|---|---|---|
| PM | 0.18 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-1-M, 1/13/2009) | 0.18 lb/hr |
| $PM_{10}$ | 0.18 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-1-M, 1/13/2009) | 0.18 lb/hr |
| $PM_{2.5}$ | 0.18 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 0.18 lb/hr **Enforceable by State-only** |
| $SO_2$ | 0.08 lb/hr (based on 0.05% sulfur by weight) | 06-096 C.M.R. ch. 115, BACT (A-366-77-1-M, 1/13/2009) | 0.01 lb/hr * |
| | 0.01 lb/hr (based on 0.0015% sulfur by weight) | 06-096 C.M.R. ch. 140, BPT (A-366-70-G-R/A, 1/31/2018) **Enforceable by State-only** | |
| $NO_x$ | 6.79 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-1-M, 1/13/2009) | 6.79 lb/hr |
| CO | 1.46 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-1-M, 1/13/2009) | 1.46 lb/hr |
| VOC | 0.54 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-1-M, 1/13/2009) | 0.54 lb/hr |
| Visible Emissions | Addressed Previously | | |

For EU #27 B2 Generator, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested ("*" denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standard | Origin and Authority | Licensed Emission Limit |
|---|---|---|---|
| PM | 0.12 lb/MMBtu | 06-096 C.M.R. ch. 103, § 2(B)(1)(a) | 0.12 lb/MMBtu |
| | 0.72 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010) | 0.72 lb/hr |
| $PM_{10}$ | 0.72 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010) | 0.72 lb/hr |
| $PM_{2.5}$ | 0.72 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 0.72 lb/hr **Enforceable by State-only** |

| Pollutant | Applicable Emission Standard | Origin and Authority | Licensed Emission Limit |
|---|---|---|---|
| $SO_2$ | 0.01 lb/hr (based on 0.0015% sulfur by weight) | 06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010) | 0.01 lb/hr |
| $NO_x$ | 19.20 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010) | 19.20 lb/hr |
| CO | 5.10 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010) | 5.10 lb/hr |
| VOC | 0.54 lb/hr | 06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010) | 0.54 lb/hr |
| Visible Emissions | Addressed Previously | | |

For the Fire Pump, a listing of potentially applicable emission standards, the origin and authority of the standards, notation if streamlining of the standards has been requested ("*" denotes a request for streamlining), and the applicable emission limits can be found below. Limits are on a 1-hour block average basis unless otherwise stated.

| Pollutant | Applicable Emission Standard | Origin and Authority | Licensed Emission Limit |
|---|---|---|---|
| PM | 0.09 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 0.09 lb/hr **Enforceable by State-only** |
| $PM_{10}$ | 0.09 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 0.09 lb/hr **Enforceable by State-only** |
| $PM_{2.5}$ | 0.09 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 0.09 lb/hr **Enforceable by State-only** |
| $SO_2$ | 0.01 lb/hr (based on 0.0015% sulfur by weight) | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 0.01 lb/hr **Enforceable by State-only** |
| $NO_x$ | 1.32 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 1.32 lb/hr **Enforceable by State-only** |
| CO | 0.29 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 0.29 lb/hr **Enforceable by State-only** |
| VOC | 0.11 lb/hr | 06-096 C.M.R. ch. 140, BPT **Enforceable by State-only** | 0.11 lb/hr **Enforceable by State-only** |

| Pollutant | Applicable Emission Standard | Origin and Authority | Licensed Emission Limit |
|---|---|---|---|
| Visible Emissions | Addressed Previously | | |

6. Emission Limit Compliance Methods

   Compliance with the emission limits associated with the emergency engines shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

7. Periodic Monitoring

   IN&H shall record data and maintain records for the following periodic monitoring values for the emergency engines.

   a. Hours of operating time on a calendar year basis. [06-096 C.M.R. ch. 137]
   b. Log of the duration and reasons for all operating times as they occur.
   c. Records of all maintenance conducted.
   d. Sulfur content of the distillate fuel fired based on fuel receipts from the supplier.

   [40 C.F.R. Part 60, Subpart IIII]

## G. Portable Engines

IN&H may operate portable engines on-site for maintenance and emergency-only purposes. Depending on their size and age, these engines may be subject to *Visible Emissions Regulation*, 06-096 C.M.R. ch. 101 and *Fuel Burning Equipment Particulate Emission Standard*, 06-096 C.M.R. ch. 103.

Any engine which cannot meet the definition of "portable engine" as defined by this license may be subject to additional State and Federal regulations. A license amendment may be necessary for a portable engine to be reclassified as stationary.

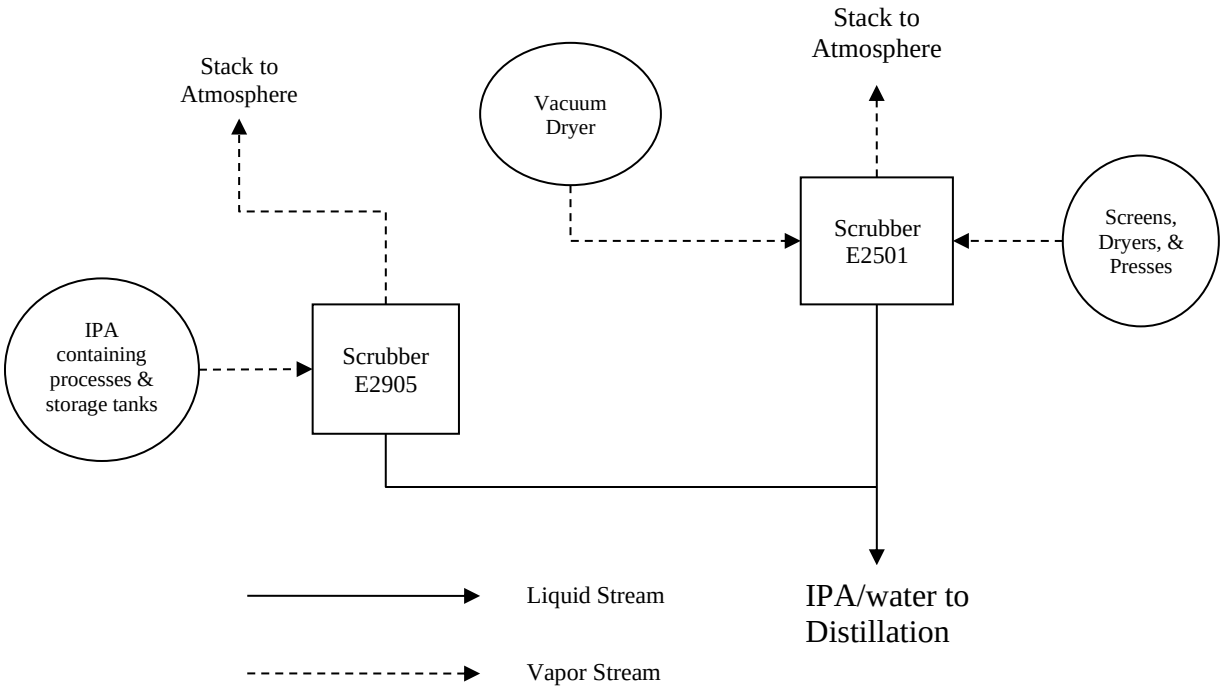
## H. VOC Emissions from Process Equipment

IN&H uses isopropyl alcohol (IPA) in its processes. IPA is a VOC but not a HAP. The following processes are controlled to limit emissions of VOC:

| Equipment ID | Pollution Control Equipment |
|---|---|
| #6, FID Hydrocolloids Isopropanol Process | Wet Scrubbers (2) |
| #17, Agarose Isopropanol Process | Wet Scrubber |
| #19, Pilot Plant | Wet Scrubber |

The two scrubbers used for control in the Hydrocolloids Process are arranged in the following manner:

**Hydrocolloids Scrubber System**




1. VOC Emission Limit

   IN&H is limited to emissions of 426.0 tpy of VOC from the Hydrocolloid Process, Agarose Process, and Pilot Plant combined on a 12-month rolling total basis.

2. VOC RACT

*Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds*, 06-096 C.M.R. ch. 134 (VOC RACT) is applicable to sources that have the potential to emit quantities of VOC equal to or greater than 40 tons/year.

In accordance with 06-096 C.M.R. ch. 134 § 3(A)(1), Option A, IN&H operates a system of wet scrubbers designed to capture and control VOC emissions such that the total VOC emissions do not exceed, on a daily basis, 15% of the uncontrolled daily VOC emissions.

3. Compliance Methods

IN&H uses a facility-wide material balance approach to demonstrate compliance with the annual VOC emission limit and with the requirement that VOC emissions not exceed 15% of uncontrolled emissions (i.e., to demonstrate an 85% control efficiency).

IN&H calculates the facility's control efficiency on a monthly basis. Due to the many process variables and the difficulty of assessing inventory on a short-term basis, daily calculations have been determined to be less accurate than using monthly totals.

IN&H shall calculate and record the facility-wide VOC Control Efficiency on a calendar month basis using the following formula:

$$\text{VOC Control Efficiency \%} = \frac{\text{Total IPA Usage}^{(1)} - \text{Total VOC Emissions}^{(2)}}{\text{Total IPA Usage}^{(1)}} \times 100$$

[1] Total IPA Usage is determined by multiplying the total IPA (at 80% concentration) which flows through the system by 0.8 to remove the water fraction.

Total IPA Usage = Total Flow x 0.8

The Total Flow is measured by two flow meters: one for the Hydrocolloids Process and Pilot Plant and one for the Agarose Process.

[2] Total VOC Emissions are determined by calculating the total amount of IPA lost from the process and subtracting the amount of IPA discharged to the wastewater system as follows:

Total VOC Emissions = IPA Lost[3] – IPA Discharged to Wastewater[4]

[3] IPA Lost is determined by taking the number of gallons purchased, at 99% concentration, and adjusting for inventory as follows:

IPA Lost = Gallons IPA Purchased + Beginning Inventory – Ending Inventory

[4] IPA Discharged to Wastewater is determined daily by use of a flowmeter on the wastewater stream and a gas chromatograph to determine IPA concentration in the wastewater.

Compliance with the annual VOC emission limit shall be demonstrated through monthly calculations of Total VOC Emissions as outlined above. Records shall be kept on a monthly and 12-month rolling total basis.

4. Periodic Monitoring

IN&H shall operate and record data from the following periodic monitors for Process VOC emissions:

a. IPA purchase records on a monthly and 12-month rolling total basis;
b. Flow (gallons) through the Hydrocolloid Process and Pilot Plant (combined) on a daily and monthly total basis;
c. Calculated IPA usage (gallons) in the Hydrocolloid Process and Pilot Plant (combined) on a daily and monthly total basis;
d. Flow (gallons) through the Agarose Process on a daily and monthly total basis;
e. Calculated IPA usage (gallons) in the Agarose Process on a daily and monthly total basis;
f. Daily IPA concentration composite wastewater analysis;
g. Wastewater discharge flow (gallons) on a daily and monthly total basis;
h. Calculated IPA Discharged to Wastewater (gallons) on a daily and monthly total basis;
i. Calculated Total VOC Emissions from the Hydrocolloid Process, Pilot Plant, and Agarose Process combined on a monthly and 12-month rolling total basis;
j. Calculated VOC Control Efficiency (%) on a monthly basis;
k. Records of monthly inspections of each wet scrubber; and
l. Records of any scrubber malfunctions and all maintenance activities.

5. Parameter Monitors

IN&H shall monitor continuously and record once per shift the scrubber media flow rate (gal/min) for each of the wet scrubbers used to control VOC from the Hydrocolloid Process, Pilot Plant, and Agarose Process. These monitors are included in IN&H's CAM plan.

## I. PM Emissions from Process Equipment

IN&H's process contains many grinding, blending, and conveying systems that have potential emissions of PM. The following processes are controlled to limit emissions of PM:

| Equipment ID | Pollution Control Equipment |
|---|---|
| #1, Lime Unloading | Baghouse |
| #3, Weed Cleaning System | Baghouse |
| #4, Perlite Unloading | Baghouse |
| #5, Cook Vent Filtration System | Cyclone |
| #7, Vacuum System for Belt Dryer Area | Baghouse |
| #8, Grinder Feed System | Baghouse |
| #9, A44 Grinder System | Baghouse |
| #10, ACM 60 Grinder System | Baghouse |
| #11, Tote Dumper System | Baghouse |
| #12, Blending Product Conveyor System | Baghouse |
| #13, Blending Area & Vacuum System | Baghouse |
| #14, Bulk Bag Filling System | Baghouse |
| #16, Specialty Blender System | Baghouse |
| #29, Blending & Packaging System | Baghouses |
| #18, Agarose Grinding Process | Baghouse |
| #28, Blending Central Vacuum System | Baghouse |
| #31, Specialty Blending Central Vacuum System | Baghouse |
| #30, Hydrated Lime Bulk Bag System | Cartridge Filter |

The Hydrated Lime Bulk Bag System controls emissions of particulate matter through use of a cartridge filter that uses pulses of air to clean the filter media, similar to a baghouse. Thus, this equipment is being considered a baghouse. It is equipped with a leak detector which alarms to indicate possible damage to the cartridge filters.

1. Particulate Matter

Emissions from baghouses, cyclones, and filters associated with IN&H's process equipment are subject to PM limits contained in *General Process Source Particulate Emission Standard*, 06-096 C.M.R. ch. 105. This rule establishes emission limits for PM based on process throughput rates. It is assumed that compliance with the applicable visible emission limits is indicative of compliance with 06-096 C.M.R.

ch. 105. Compliance shall be demonstrated in accordance with the appropriate test methods upon request of the Department.

2. Visible Emissions

The baghouses and cartridge filter are subject to the following visible emissions standard pursuant to 06-096 C.M.R. ch. 101, § 4(B)(3):

> Visible emissions shall not exceed 10% opacity on a six-minute block average basis.

All other emission points from general processes, including the Cook Vent Filtration System cyclone, are subject to the following visible emissions standard pursuant to 06-096 C.M.R. ch. 101, § 4(B)(4):

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

Compliance with these visible emission standards shall be demonstrated in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 upon request by the Department.

3. Periodic Monitoring

IN&H shall monitor and record the following periodic monitors for Process PM emissions:

a. Monthly inspections of each baghouse, cyclone, cartridge filter, and any associated leak detectors;
b. Any baghouse, cyclone, cartridge filter, or leak detector malfunction including the date and time of any alarms and resulting corrective actions or response; and
c. Any maintenance activities (planned or unplanned) performed on each baghouse, cyclone, cartridge filter, and leak detectors.

4. Parameter Monitors

IN&H shall operate bag leak detectors on all of the baghouses and the cartridge filter. The bag leak detectors shall be operated continuously and records maintained indicating the date and time of any alarms and resulting corrective actions. These monitors are included in IN&H's CAM plan.

## J. IPA Storage Tanks

IN&H operates two tanks larger than 10,000 gallons (i.e., not insignificant units pursuant to 06-096 C.M.R. ch. 140, Appendix B) that store IPA or solutions with high concentrations of IPA.

*Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984*, 40 C.F.R Part 60, Subpart Kb is applicable to tanks which store VOC liquids and are larger than 75 cubic meters (19,813 gallons). IN&H operates one IPA tank with a capacity of 35,000 gallons. However, this regulation does not apply to tanks less than 151 cubic meters (39,900 gallons) that store liquids with a true vapor pressure less than 15.0 kPa. IPA has a vapor pressure of approximately 4.4 kPa. Therefore, 40 C.F.R. Part 60, Subpart Kb is not applicable to any tanks at IN&H.

## K. Ethylene Oxide Usage

IN&H uses Ethylene Oxide (EtO), a VOC and HAP, in the Agarose Process for the production of agarose products with certain specifications. The EtO is used in the production of the agarose gel itself and not as a cleaning/sterilization agent. The EtO adds a hydroxyl group to the agarose molecule which changes the physical properties (e.g., strength and melting point) of the agarose gel produced. IN&H uses less than 300 pounds of EtO per year, and it is assumed that it is completely consumed in the process. This process is therefore considered an insignificant activity.

IN&H is not subject to *Ethylene Oxide Emissions Standards for Sterilization Facilities*, 40 C.F.R. Part 63, Subpart O as IN&H does not use EtO for sterilization or fumigation of materials, and therefore does not meet the definition of Sterilization Facility.

## L. Fugitive Emissions

IN&H 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.

IN&H 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.

## M. Performance Test Protocol

For any performance testing required by this license, IN&H 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. 140, BPT]

The Department's Performance Testing Guidance is available online at: https://www.maine.gov/dep/air/emissions/testing.html

## N. Emission Statements

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

1. The amount of each fuel fired in each boiler and emergency engine on a monthly basis;
2. The sulfur content of the distillate fuel fired in the boilers and emergency engines;
3. The amount of IPA lost from the process on a monthly basis; and
4. Hours each emission unit was active or operating on a monthly basis.

Every third year, or as requested by the Department, IN&H 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. IN&H 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)]

## O. Facility 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 the following assumptions:

- Firing of 1,400,000 MMBtu/year of fuel in the boilers and the higher emission factor for either distillate fuel or natural gas;
- Operating each emergency generator and fire pump for 100 hr/year; and
- A VOC limit of 426.0 tpy from process equipment.

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 |
|---|---|---|---|---|---|---|---|
| Boilers | 56.0 | 56.0 | 56.0 | 1.1 | 140.0 | 57.1 | 3.7 |
| EU#23 B5 Generator | – | – | – | – | 1.0 | 0.3 | – |
| EU#26 B15 Generator | – | – | – | – | 0.3 | 0.1 | – |
| EU#27 B2 Generator | – | – | – | – | 1.0 | 0.3 | – |
| Fire Pump | – | – | – | – | 0.1 | – | – |
| Process VOC | – | – | – | – | – | – | 426.0 |
| **Total TPY** | **56.0** | **56.0** | **56.0** | **1.1** | **142.4** | **57.8** | **429.7** |

| Pollutant | Tons/year |
|---|---|
| Single HAP | 9.9 |
| Total HAP | 24.9 |

## III. AMBIENT AIR QUALITY ANALYSIS

IN&H previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Part 70 License.

## ORDER

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

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

The Department hereby grants the Part 70 License A-366-70-K-R pursuant to 06-096 C.M.R. ch. 140 and the preconstruction permitting requirements of 06-096 C.M.R. ch. 115 and subject to the standard and specific conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to IN&H pursuant to the Department's preconstruction permitting requirements have been incorporated into this Part 70 license, except for such conditions that the Department has determined are obsolete, extraneous, or otherwise environmentally insignificant, as explained in

the Findings of Fact accompanying this Order. As such, the conditions in this license supersede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in *Major and Minor Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115 for making such changes and pursuant to the applicable requirements in 06-096 C.M.R. ch. 140.

For each standard and specific condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

Severability. The invalidity or unenforceability of any provision 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 STATEMENTS**

(1) 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. 140]

(2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 140]

(3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 C.M.R. ch. 140]

(4) 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. 140]

(5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 C.M.R. ch. 140]

(6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or affect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in their renewal application.

**Permit Shield Table**

| Source | Citation | Description | Basis for Determination |
|---|---|---|---|
| Boilers #3, 4, 5 | 06-096 C.M.R. ch. 134 | Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds (VOC RACT) | Combustion sources exempt pursuant to 06-096 C.M.R. ch. 134 § (1)(C)(4). |
| Boilers #3, 4, 5 | 40 C.F.R. Part 60, Subpart Dc | Standards of Performance Small Industrial-Commercial Steam Generating Units | These boilers commenced construction prior to June 9, 1989 |
| Boilers #3, 4, 5 | 40 C.F.R. Part 63, Subpart DDDDD | NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters | Facility is not a major source of HAP |
| EU#23 B5 Generator & Fire Pump | 06-096 C.M.R. ch.103, § 2(B)(4)(c) | Particulate emission limit for fuel burning equipment > 3.0 MMBtu/hr. | Units are < 3.0 MMBtu/hr. |

[06-096 C.M.R. ch. 140]

(7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of three or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to 06-096 C.M.R. ch. 140;

B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or

D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[06-096 C.M.R. ch. 140]

(8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading, and other similar programs or processes for changes that are provided for in the Part 70 license. [06-096 C.M.R. ch. 140]

**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 and this license (38 M.R.S. § 347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in 06-096 C.M.R. ch. 140. [06-096 C.M.R. ch. 140]

(3) 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. 140] **Enforceable by State-only**

(4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to 38 M.R.S. § 353-A.

(5) The licensee shall maintain and operate all emission units and air pollution control 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. 140]
**Enforceable by State-only**

(6) 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. In addition, the licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license. [06-096 C.M.R. ch. 140]

(7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, 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 the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [06-096 C.M.R. ch. 140]

(8) 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 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;

2. To demonstrate compliance with the applicable emission standards; or

3. 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. 140] **Enforceable by State-only**

(9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

A. Within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 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. 140] **Enforceable by State-only**

(10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 M.R.S. § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design, or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

C. All other deviations shall be reported to the Department in the facility's semiannual report.

[06-096 C.M.R. ch. 140]

(11) Upon the written request of 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 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. 140]

(12) The licensee shall submit semiannual reports of any required periodic monitoring by January 31 and July 31 of each year, or on an equivalent schedule specified in the license. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [06-096 C.M.R. ch. 140]

(13) The licensee shall submit a compliance certification to the Department and EPA annually by January 31 of each year, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:

A. The identification of each term or condition of the Part 70 license that is the basis of the certification;
B. The compliance status;
C. Whether compliance was continuous or intermittent;
D. The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
E. Such other facts as the Department may require to determine the compliance status of the source.

[06-096 C.M.R. ch. 140]

**SPECIFIC CONDITIONS**

(14) **Boilers #3, #4, and #5**

A. Allowable Fuels

1. Boilers #3, #4, and #5 are licensed to fire natural gas and distillate fuel. [06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014)]

2. Fuel use for Boilers #3, #4, and #5 combined shall not exceed the equivalent of 1,400,000 MMBtu/year for all fuel combined on a 12-month rolling total basis. Compliance shall be demonstrated by records of the quantity of each fuel consumed and calculations converting fuel use to MMBtu. Records shall be kept on a monthly and 12-month rolling total basis. When converting fuel use to MMBtu, IN&H shall use a heating value of 0.14 MMBtu/gallon for distillate fuel and 0.00103 MMBtu/scf, or the actual heat content provided by the supplier, for natural gas. [06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014)

B. Fuel Sulfur Content

1. IN&H shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm).
[38 M.R.S. § 603-A(2)(A)(3)(a)]

2. Sulfur Content Compliance
Sulfur content compliance shall be demonstrated by fuel records showing the quantity, type, and the percent sulfur of the fuel delivered. Fuel sulfur content 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 (A-366-77-7-A, 11/9/2016)]

C. Boiler Emission Limits
(Emission limits are on a 1-hour block average basis unless otherwise stated.)

1. Emissions from Boiler #3 shall not exceed the following limits when firing natural gas:

| Pollutant | lb/MMBtu | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 0.05 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $NO_x$ | 0.17 | 06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016) | Federally Enforceable |

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 4.28 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $PM_{10}$ | 4.28 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $PM_{2.5}$ | 4.28 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $SO_2$ | 0.05 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $NO_x$ | 14.55 | 06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016) | Federally Enforceable |
| CO | 6.98 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| VOC | 0.46 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |

2. Emissions from Boiler #3 shall not exceed the following limits when firing distillate fuel:

| Pollutant | lb/MMBtu | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 0.08 | 06-096 C.M.R. ch. 103, § 2(B)(1)(b) | Federally Enforceable |
| $NO_x$ | 0.20 | 06-096 C.M.R. ch. 115, BACT (A-366-77-7-A) | Federally Enforceable |

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 6.85 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $PM_{10}$ | 6.85 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $PM_{2.5}$ | 6.85 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $SO_2$ | 0.13 | 06-096 C.M.R. ch. 140, BPT | Federally Enforceable |
| $NO_x$ | 17.12 | 06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016) | Federally Enforceable |

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|---|---|---|---|
| CO | 3.06 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| VOC | 0.12 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |

3. Emissions from Boiler #4 shall not exceed the following limits when firing natural gas:

| Pollutant | lb/MMBtu | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 0.05 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $NO_x$ | 0.10 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 2.43 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $PM_{10}$ | 2.43 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $PM_{2.5}$ | 2.43 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $SO_2$ | 0.03 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $NO_x$ | 4.72 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| CO | 3.96 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| VOC | 0.26 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |

4. Emissions from Boiler #4 shall not exceed the following limits when firing distillate fuel:

| Pollutant | lb/MMBtu | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 0.08 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $NO_x$ | 0.17 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 3.89 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $PM_{10}$ | 3.89 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|---|---|---|---|
| $PM_{2.5}$ | 3.89 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $SO_2$ | 0.07 | 06-096 C.M.R. ch. 140, BPT | Federally Enforceable |
| $NO_x$ | 8.33 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| CO | 1.74 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| VOC | 0.07 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |

5. Emissions from Boiler #5 shall not exceed the following limits when firing natural gas:

| Pollutant | lb/MMBtu | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 0.05 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $NO_x$ | 0.17 | 06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016) | Federally Enforceable |

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 2.42 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $PM_{10}$ | 2.42 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $PM_{2.5}$ | 2.42 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $SO_2$ | 0.03 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $NO_x$ | 8.23 | 06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016) | Federally Enforceable |
| CO | 3.95 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| VOC | 0.26 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |

6. Emissions from Boiler #5 shall not exceed the following limits when firing distillate fuel:

| Pollutant | lb/MMBtu | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 0.08 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $NO_x$ | 0.17 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 3.87 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $PM_{10}$ | 3.87 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| $PM_{2.5}$ | 3.87 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $SO_2$ | 0.07 | 06-096 C.M.R. ch. 140, BPT | Federally Enforceable |
| $NO_x$ | 8.30 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 11/9/2016) | Federally Enforceable |
| CO | 1.73 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |
| VOC | 0.07 | 06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014) | Federally Enforceable |

D. Visible Emissions

1. During periods of time when only natural gas is being fired in the boilers exhausting to Stack #5-1, visible emissions shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, §§ 4(A)(3) & 4(D)]

2. During periods of time when distillate fuel is being fired in any boiler exhausting to Stack #5-1, visible emissions shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, §§ 4(A)(2) & 4(D)]

3. The visible emission standards apply at all times including periods of startup and shutdown. IN&H shall conduct performance testing for visible emissions from Stack #2 using 40 C.F.R. Part 60, Appendix A, Method 9 annually with no more than 14 months between tests. During the performance test, at least one of the boilers must be started up firing distillate fuel. The initial test shall be performed no later than six months from the date of this license. [40 C.F.R. § 70.6(c)(1)]

E. Compliance Methods

Compliance with the emission limits listed above shall be demonstrated in accordance with the following methods and frequencies, or other methods and frequencies as approved by the Department [06-096 C.M.R. ch. 140]:

| Pollutant | Applicable Emission Limit | Compliance Method | Frequency |
|---|---|---|---|
| PM | lb/MMBtu | 40 C.F.R. Part 60, App. A, Method 5 | As requested |
| | lb/hr | | |
| $PM_{10}/PM_{2.5}$ | lb/hr | 40 C.F.R. Part 60, App. A, Method 5 or EPA Test Method 201 or 201A | As requested |
| $SO_2$ | lb/hr | 40 C.F.R. Part 60, App. A, Method 6 | As requested |
| $NO_X$ | lb/MMBtu | 40 C.F.R. Part 60, App. A, Method 7E | As requested |
| | lb/hr | 40 C.F.R. Part 60, App. A, Method 7E | As requested |
| CO | lb/hr | 40 C.F.R. Part 60, App. A, Method 10 | As requested |
| VOC | lb/hr | 40 C.F.R. Part 60, App. A, Method 25 or 25A | As requested |
| Visible Emissions | % opacity on a 6-minute block average basis | 40 C.F.R. Part 60, App. A, Method 9 | Annually |

F. Periodic Monitoring

IN&H shall record data and maintain records for the following periodic monitoring values for Boilers #3, #4, and #5 whenever the equipment is operating.

1. Hours of operation of each boiler on a monthly and calendar year total basis; [06-096 C.M.R. ch. 137]
2. Amount of natural gas (scf) fired in each boiler on a monthly and calendar year total basis.; [06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014)]
3. Amount of distillate fuel (gallons) fired in each boiler on a monthly and calendar year total basis; [06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014)]
4. Sulfur content of the distillate fuel fired based on fuel receipts from the supplier; [06-096 C.M.R. ch. 115, BACT (A-366-77-7-A, 11/9/2016)]
5. The total heat input (MMBtu) for all boilers combined on a monthly and 12-month rolling total basis; [06-096 C.M.R. ch. 115, BACT (A-366-77-6-A, 3/26/2014)]
6. Dates of the annual tune-ups for Boilers #4 and #5; [06-096 C.M.R. ch. 138] and

7. Tune-up records for Boilers #4 and #5 including the tune-up procedure, an oxygen/carbon monoxide curve, and optimum excess oxygen setting. [06-096 C.M.R. ch. 138]

G. IN&H shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJJ applicable to Boilers #3, #4, and #5 including, but not limited to, the following: [incorporated under 06-096 C.M.R. ch. 115, BPT/BACT]

1. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]

   a. Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. Boilers #3, #4, and #5 are existing oil-fired boilers with oxygen trim systems which maintain an optimum air-to-fuel ratio. The tune-up frequency for such boilers is every five years. [40 C.F.R. § 63.11223(a) and Table 2]

   b. The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
      (1) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection. [40 C.F.R. § 63.11223(b)(1)]
      (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 C.F..R § 63.11223(b)(2)]
      (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted for up to 72 months from the previous inspection. [40 C.F.R. § 63.11223(b)(3)]
      (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 63.11223(b)(4)]
      (5) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 C.F.R. § 63.11223(b)(5)]
      (6) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 C.F.R. § 63.11223(b)(7)]

c. Tune-Up Report: A tune-up report shall be maintained onsite and submitted to the Department and EPA upon request. The report shall contain the following information:
   (1) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
   (2) A description of any corrective actions taken as part of the tune-up of the boiler; and
   (3) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 C.F.R. § 63.11223(b)(6)]

2. Compliance Report

For every five-year compliance period, IN&H shall prepare a compliance report by March 1st of the following year to document the information below for the five-year period. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

a. Company name and address;
b. A statement of whether the source has complied with all the relevant requirements of this Subpart;
c. A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
d. The following certifications, as applicable:
   (1) "This facility complies with the requirements in 40 C.F.R. § 63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
   (2) "No secondary materials that are solid waste were combusted in any affected unit."
   (3) "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

3. Recordkeeping

   a. Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJJ including the following [40 C.F.R. § 63.11225(c)]:

      (1) Copies of notifications and reports with supporting compliance documentation;
      (2) Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
      (3) Records of the occurrence and duration of each malfunction of each applicable boiler; and
      (4) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

   b. Records shall be in a form suitable and readily available for expeditious review. Each record must be kept for 5 years following the date of each recorded action. Each record must be kept on-site or be accessible from a central location by computer or other means that instantly provides access at the site for at least 2 years after the date of each recorded action. The records may be maintained off-site for the remaining 3 years. [40 C.F.R. § 63.11225(d)] Note: Standard Condition (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJJ shall be streamlined to the more stringent six-year requirement.

(15) **Emergency Engines**

A. Allowable Operation and Fuels

1. The emergency engines (EU#23 B5 Generator, EU#26 B15 Generator, EU#27 B2 Generator, and the Fire Pump) are licensed to fire distillate fuel. [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-only**
2. The emergency engines shall each be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-only**

B. Fuel Sulfur Content

1. The fuel oil sulfur content for EU#23 B5 Generator and the Fire Pump shall be limited to 0.0015% sulfur by weight. [06-096 C.M.R. ch. 140, BPT] **Enforceable by State-only**
2. The fuel oil sulfur content for EU#26 B15 Generator shall be limited to 0.0015% sulfur by weight. [06-096 C.M.R. ch. 140, BPT]
3. The fuel oil sulfur content for EU#27 B2 Generator shall be limited to 0.0015% sulfur by weight. [06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010)]

4. Fuel sulfur content compliance shall be demonstrated by fuel delivery receipts from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010)]

C. Emission Standards

1. Emissions from EU#23 B5 Generator shall not exceed the following limits:

| Pollutant | lb/MMBtu | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 0.12 | 06-096 C.M.R. ch. 103 § 2(B)(1)(a) | Federally Enforceable |

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 0.72 | 06-096 C.M.R. ch. 140, BPT (A-366-70-F-R, 9/26/2009) | **Enforceable by State-only** |
| $PM_{10}$ | 0.72 | 06-096 C.M.R. ch. 140, BPT (A-366-70-F-R, 9/26/2009) | **Enforceable by State-only** |
| $PM_{2.5}$ | 0.72 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $SO_2$ | 0.01 | 06-096 C.M.R. ch. 140, BPT (A-366-70-G-R/A, 1/31/2018) | **Enforceable by State-only** |
| $NO_x$ | 19.20 | 06-096 C.M.R. ch. 140, BPT (A-366-70-F-R, 9/26/2009) | **Enforceable by State-only** |
| CO | 5.10 | 06-096 C.M.R. ch. 140, BPT (A-366-70-F-R, 9/26/2009) | **Enforceable by State-only** |
| VOC | 0.54 | 06-096 C.M.R. ch. 140, BPT (A-366-70-F-R, 9/26/2009) | **Enforceable by State-only** |

2. Emissions from EU#26 B15 Generator shall not exceed the following limits:

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 0.18 | 06-096 C.M.R. ch. 115, BACT (A-366-77-1-M, 1/13/2009) | Federally Enforceable |
| $PM_{10}$ | 0.18 | 06-096 C.M.R. ch. 115, BACT (A-366-77-1-M, 1/13/2009) | Federally Enforceable |
| $PM_{2.5}$ | 0.18 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $SO_2$ | 0.01 | 06-096 C.M.R. ch. 140, BPT | Federally Enforceable |
| $NO_x$ | 6.79 | 06-096 C.M.R. ch. 115, BACT (A-366-77-1-M, 1/13/2009) | Federally Enforceable |
| CO | 1.46 | 06-096 C.M.R. ch. 115, BACT (A-366-77-1-M, 1/13/2009) | Federally Enforceable |
| VOC | 0.54 | 06-096 C.M.R. ch. 115, BACT (A-366-77-1-M, 1/13/2009) | Federally Enforceable |

3. Emissions from EU#27 B2 Generator shall not exceed the following limits:

| Pollutant | lb/MMBtu | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 0.12 | 06-096 C.M.R. ch. 103 § 2(B)(1)(a) | Federally Enforceable |

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 0.72 | 06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010) | Federally Enforceable |
| $PM_{10}$ | 0.72 | 06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010) | Federally Enforceable |
| $PM_{2.5}$ | 0.72 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $SO_2$ | 0.01 | 06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010) | Federally Enforceable |
| $NO_x$ | 19.20 | 06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010) | Federally Enforceable |
| CO | 5.10 | 06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010) | Federally Enforceable |
| VOC | 0.54 | 06-096 C.M.R. ch. 115, BACT (A-366-77-2-A, 10/18/2010) | Federally Enforceable |

4. Emissions from the Fire Pump shall not exceed the following limits:

| Pollutant | lb/hr | Origin and Authority | Enforceability |
|---|---|---|---|
| PM | 0.09 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $PM_{10}$ | 0.09 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $PM_{2.5}$ | 0.09 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $SO_2$ | 0.01 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| $NO_x$ | 1.32 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| CO | 0.29 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |
| VOC | 0.11 | 06-096 C.M.R. ch. 140, BPT | **Enforceable by State-only** |

D. Visible Emissions

Visible emissions from each of the emergency engines shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time IN&H 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. IN&H 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. Each of the emergency engines shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ, including the following:

1. IN&H shall meet the following operational limitations for each of the emergency engines:

   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. 140, BPT]

2. Oil Analysis Program Option
   IN&H 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, IN&H 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
   A non-resettable hour meter shall be installed and operated on each engine. [40 C.F.R. § 63.6625(f)]

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

   a. The engines shall each 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). 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. 140, BPT]

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

5. Operation and Maintenance
   The engines shall be operated and maintained according to the manufacturer's emission-related written instructions, or IN&H 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)]

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]

(16) **VOC Emissions from Process Equipment**

A. IN&H shall maintain and operate four wet scrubbers (Scrubber E2501, the Rotary Screen Scrubber, the Agarose Plant Scrubber, and the Pilot Plant Scrubber) for VOC control. The wet scrubbers shall be operated such that facility wide VOC emissions do not exceed 15% of the uncontrolled VOC emissions on a daily basis as demonstrated

by monthly calculations which demonstrate the VOC Control Efficiency exceeds 85%. [06-096 C.M.R. ch. 134 § 3(A)(1)]

B. VOC Control Efficiency shall be calculated as follows:

$$\text{VOC Control Efficiency \%} = \frac{\text{Total IPA Usage}^{(1)} - \text{Total VOC Emissions}^{(2)}}{\text{Total IPA Usage}^{(1)}} \times 100$$

Where:

[1] Total IPA Usage is determined by multiplying the total IPA (at 80% concentration) which flows through the system by 0.8 to remove the water fraction.

Total IPA Usage = Total Flow x 0.8

The Total Flow is measured by two flow meters; one for the Hydrocolloids Process and Pilot Plant and one for the Agarose Process.

[2] Total VOC Emissions are determined by calculating the total amount of IPA lost from the process and subtracting the amount of IPA discharged to the wastewater system as follows:

Total VOC Emissions = IPA Lost[3] – IPA Discharged to Wastewater[4]

[3] IPA Lost is determined by taking the number of gallons purchased, at 99% concentration, and adjusting for inventory as follows:

IPA Lost = Gallons IPA Purchased + Beginning Inventory – Ending Inventory

[4] IPA Discharged to Wastewater is determined by daily by use of a flowmeter on the wastewater stream and a gas chromatograph to determine IPA concentration in the wastewater.

[06-096 C.M.R. ch. 134]

C. Periodic Monitoring

IN&H shall operate and record data from the following periodic monitors for Process VOC emissions:

1. IPA purchase records on a monthly and 12-month rolling total basis;
2. Flow (gallons) through the Hydrocolloid Process and Pilot Plant (combined) on a daily and monthly total basis;
3. Calculated IPA usage (gallons) in the Hydrocolloid Process and Pilot Plant (combined) on a daily and monthly total basis;
4. Flow (gallons) through the Agarose Process on a daily and monthly total basis;
5. Calculated IPA usage (gallons) in the Agarose Process on a daily and monthly total basis;
6. Daily IPA concentration composite wastewater analysis;
7. Wastewater discharge flow (gallons) on a daily and monthly total basis;
8. Calculated IPA Discharged to Wastewater (gallons) on a daily and monthly total basis;
9. Calculated Total VOC Emissions from the Hydrocolloid Process, Pilot Plant, and Agarose Process combined on a monthly and 12-month rolling total basis;
10. Calculated VOC Control Efficiency (%) on a monthly basis;
11. Records of monthly inspections of each wet scrubber; and
12. Records of any scrubber malfunctions and all maintenance activities.

[06-096 C.M.R. ch. 134]

D. Parameter Monitoring

IN&H shall monitor continuously and record once per shift the scrubber media flow rate (gal/min) for each of the wet scrubbers used to control VOC from the Hydrocolloid Process, Pilot Plant, and Agarose Process. These monitors are included in IN&H's CAM plan. [06-096 C.M.R. ch. 115, BACT (A-366-70-C-A, 3/22/2005) and 40 C.F.R. Part 64]

(17) **PM Emissions from Process Equipment**

A. IN&H shall maintain and operate controls for particulate matter on the following equipment:

| Equipment ID | Pollution Control Equipment |
|---|---|
| #1, Lime Unloading | Baghouse |
| #3, Weed Cleaning System | Baghouse |
| #4, Perlite Unloading | Baghouse |
| #5, Cook Vent Filtration System | Cyclone |
| #7, Vacuum System for Belt Dryer Area | Baghouse |
| #8, Grinder Feed System | Baghouse |
| #9, A44 Grinder System | Baghouse |
| #10, ACM 60 Grinder System | Baghouse |
| #11, Tote Dumper System | Baghouse |
| #12, Blending Product Conveyor System | Baghouse |
| #13, Blending Area & Vacuum System | Baghouse |
| #14, Bulk Bag Filling System | Baghouse |
| #16, Specialty Blender System | Baghouse |
| #29, Blending & Packaging System | Baghouses |
| #18, Agarose Grinding Process | Baghouse |
| #28, Blending Central Vacuum System | Baghouse |
| #31, Specialty Blending Central Vacuum System | Baghouse |
| #30, Hydrated Lime Bulk Bag System | Cartridge Filter |

[06-096 C.M.R. ch. 140, BPT] **Enforceable by State-only**

B. IN&H shall operate and maintain a cartridge filter for control of particulate matter for the Hydrated Lime Bulk Bag System. [06-096 C.M.R. ch. 115, BACT (A-366-77-8-A, 8/31/2021)]

C. IN&H shall operate a leak detector on the Hydrated Lime Bulk Bag System cartridge filter. [06-096 C.M.R. ch. 115, BACT (A-366-77-8-A, 8/31/2021)]

D. Parameter Monitoring

IN&H shall operate bag leak detectors on all of the baghouses. The bag leak detectors shall be operated continuously in accordance with the manufacturer's recommendations and records maintained indicating the date and time of any alarms and resulting corrective actions or responses. These events are not considered deviations provided IN&H responds to an alarm by either determining that the

baghouse did not malfunction (i.e., false alarm) and no corrective action is necessary or by immediately shutting down the process. These monitors are included in IN&H's CAM plan. [40 C.F.R. Part 64]

E. Visible emissions from the Hydrated Lime Bulk Bag System cartridge filter and the facility's baghouses shall each not exceed an opacity of 10% on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(B)(3)]

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

G. Periodic Monitoring

IN&H shall conduct and maintain records of the following periodic monitors for Process PM emissions [06-096 C.M.R. ch. 140, BPT and 06-096 C.M.R. ch. 115, BACT (A-366-77-8-A, 8/31/2021)]:

1. Monthly inspections of each baghouse, cyclone, cartridge filter, and any associated leak detectors;
2. Any baghouse, cyclone, cartridge filter, or leak detector malfunction including the date and time of any alarms and resulting corrective actions or response; and
3. Any maintenance activities (planned or unplanned) performed on each baghouse, cyclone, cartridge filter, and leak detectors.

(18) **Fugitive Emissions**

A. IN&H 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. IN&H 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)]

(19) **Performance Test Protocol**

For any performance testing required by this license, IN&H 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. 140, BPT] **Enforceable by State-only**

(20) **Parameter Monitor General Requirements**
[06-096 C.M.R. chs. 140 and 117]

A. Parameter monitors required by this license shall be installed, operated, maintained, and calibrated in accordance with manufacturer recommendations or as otherwise required by the Department.

B. Parameter monitors required by this license shall continuously monitor data at all times the associated emissions unit is in operation. "Continuously" with respect to the operation of parameter monitors required by this license means providing equally spaced data points with at least one valid data point in each successive 15-minute period. A minimum of three valid 15-minute periods constitute a valid hour.

C. Each parameter monitor must record accurate and reliable data. If any parameter monitor is recording accurate and reliable data less than 98% of the source-operating time within any quarter of the calendar year, the Department may initiate enforcement action. The Department may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the Department's satisfaction that the failure of the system to record such data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions.

**Enforceable by State-only**

(21) **Compliance Assurance Monitoring (CAM) – General Requirements**

A. The licensee shall operate and monitor all emission units and their associated control equipment in accordance with the approved CAM Plan. [40 C.F.R. Part 64]

B. Any excursion shall be reported in semiannual reports. If excursions occur, the licensee must also certify intermittent compliance with the emission limits for the control device monitored in the annual compliance certification. [40 C.F.R. Part 64]

C. Upon detecting an excursion, the licensee shall restore normal operation of the control equipment as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. [40 C.F.R. § 64.7(d)]

D. Prior to making any changes to the approved CAM plan, the licensee shall notify the Department and, if necessary, submit a proposed license modification application to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [40 C.F.R. § 64.7(e)]

E. Any change of the target level shall be submitted in a letter to the Department for written approval. [06-096 C.M.R. ch. 140, BPT]

(22) **Semiannual Reporting** [06-096 C.M.R. ch. 140]

A. The licensee shall submit to the Department semiannual reports which are due on **January 31st** and **July 31st** of each year. The facility's designated responsible official must sign this report.
B. The semiannual report shall be considered on-time if the postmark of the submittal is on or before the due date or if the report is received by the Department within seven calendar days of the due date.
C. Each semiannual report shall include a summary of the periodic and CAM monitoring required by this license.
D. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

(23) **Annual Compliance Certification**

IN&H shall submit an annual compliance certification to the Department and EPA in accordance with Standard Condition (13) of this license. The annual compliance certification is due **January 31st** of each year. The facility's designated responsible official must sign this report.

The annual compliance certification shall be considered on-time if the postmark of the submittal is on or before the due date or if the report is received by the Department within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [06-096 C.M.R. ch. 140]

(24) **Annual Emission Statements**

A. In accordance with *Emission Statements*, 06-096 C.M.R. ch. 137, IN&H 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. IN&H shall keep the following records in order to comply with 06-096 C.M.R. ch. 137:

1. The amount of each fuel fired in each boiler and emergency engine on a monthly basis;
2. The sulfur content of the distillate fuel fired in the boilers and emergency engines;
3. The amount of IPA lost from the process on a monthly basis; and
4. Hours each emission unit was active or operating on a monthly basis.

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

C. Every third year, or as requested by the Department, IN&H 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. IN&H 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)]

(25) **General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

| Origin and Authority | Requirement Summary | Enforceability |
|---|---|---|
| 06-096 C.M.R. ch. 102 | Open Burning | - |
| 06-096 C.M.R. ch. 109 | Emergency Episode Regulations | - |
| 06-096 C.M.R. ch. 110 | Ambient Air Quality Standards | - |
| 06-096 C.M.R. ch. 116 | Prohibited Dispersion Techniques | - |
| 38 M.R.S. § 585-B, §§5 | Mercury Emission Limit | Enforceable by State-only |

(26) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. Examples of such units include refrigerators and any size air conditioners that contain CFCs. [40 C.F.R. Part 82, Subpart F]

(27) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Facility shall comply with the *Standard for Asbestos Demolition and Renovation*, 40 C.F.R. Part 61, Subpart M.

(28) **Expiration of a Part 70 license**

A. IN&H shall submit a complete Part 70 renewal application at least six but no more than 18 months prior to the expiration of this air license.

B. Pursuant to Title 5 M.R.S. §10002, and 06-096 C.M.R. ch. 140, the Part 70 license shall not expire and all terms and conditions shall remain in effect until the Department takes final action on the renewal application of the Part 70 license. An existing source submitting a complete renewal application under 06-096 C.M.R. ch. 140 prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license. **Enforceable by State-only**

(29) **New Source Review**

IN&H is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emission license, and the NSR requirements remain in effect even if this 06-096 C.M.R. ch. 140 Air Emissions License, A-366-70-K-R, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 29th DAY OF JULY, 2024.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:_____ for ____
MELANIE LOYZIM, COMMISSIONER

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

[Note: If a complete renewal application, as determined by the Department, is submitted at least six but no more than 18 months prior to expiration of the facility's Part 70 license, then pursuant to Title 5 M.R.S. §10002, all terms and conditions of the Part 70 license shall remain in effect until the Department takes final action on the Part 70 license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 6/9/2022
Date of application acceptance: 6/9/2022

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

**FILED**

JUL 29, 2024

**State of Maine**
**Board of Environmental Protection**