



DEPARTMENT ORDER

**Crooker Construction, LLC**  
**Sagadahoc County**  
**Topsham, Maine**  
**A-187-71-N-M**

**Departmental**  
**Findings of Fact and Order**  
**Air Emission License**  
**Amendment #1**

**FINDINGS OF FACT**

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

**I. REGISTRATION**

**A. Introduction**

Crooker Construction, LLC (Crooker) was issued Air Emission License A-187-71-M-R/A on April 9, 2018, for the operation of emission sources associated with their asphalt batch plant and crushed stone facility.

Crooker has requested a minor revision to their license in order to correct the PM and PM<sub>10</sub> emission limits for the Asphalt Plant, which were originally listed as significantly lower than is appropriate for this equipment.

The equipment addressed in this license amendment is located at 103 Lewiston Road, Topsham, Maine.

**B. Emission Equipment**

The following equipment is addressed in this Air Emission License Amendment:

**Asphalt Plant**

<b>Equipment</b>	<b>Process Rate (tons/hour)</b>	<b>Design Capacity (MMBtu/hr)</b>	<b>Fuel Type, % sulfur</b>	<b>Control Device</b>	<b>Stack ID</b>	<b>Date of Manuf.</b>
Asphalt Plant	180	103	Distillate fuel, 0.5%, #5 Oil, 0.7% Natural Gas, neg.	Baghouse	1	1972

C. 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.

This amendment will not increase emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

II. **BEST PRACTICAL TREATMENT**

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. Separate control requirement categories exist for new and existing equipment.

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

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

B. Minor Revision Description

In Air Emission License A-187-71-M-R/A the pound per hour emission limits for PM and PM<sub>10</sub> for the Asphalt Plant were both listed as 0.11 lb/hr. This is inconsistent with the listed PM and PM<sub>10</sub> emission factor of 0.03 gr/dscf and the operating parameters of the equipment. This Minor Revision seeks to correct these inconsistencies by updating the emission limits for both PM and PM<sub>10</sub>. The corrected emission limits for the Asphalt Plant are listed below.

The BPT emission limits for the asphalt plant are the following:

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM<sub>10</sub> (lb/hr)</u>	<u>SO<sub>2</sub> (lb/hr)</u>	<u>NO<sub>x</sub> (lb/hr)</u>	<u>CO (lb/hr)</u>	<u>VOC (lb/hr)</u>
Asphalt Plant Natural Gas	6.51	6.51	0.83	45.00	72.00	1.48
Asphalt Plant Distillate fuel Spec. waste oil	6.51	6.51	15.84	21.60	72.00	1.48

C. Annual Emissions

Crooker shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits were calculated based on 275,000 tons/yr of asphalt throughput using the higher emission factor from either distillate fuel or natural gas, and a combined 27,000 gal/yr distillate fuel fired in the Portable Diesel Generator, Pegson Engine, Metso Engines #1 and #2, Finlay Screen Engine, Extec Screen Engine, Rawson Screen Engine, MGL Stacker Engine, and GeoTrek Stacker Engine:

**Total Licensed Annual Emissions for the Facility**  
**Tons/year**  
(used to calculate the annual license fee)

	<u>PM</u>	<u>PM<sub>10</sub></u>	<u>SO<sub>2</sub></u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>VOC</u>
Asphalt Plant	5.0	5.0	12.1	34.4	55.0	1.1
Engines	0.2	0.2	0.1	5.9	1.6	0.2
<b>Total TPY</b>	<b>5.2</b>	<b>5.2</b>	<b>12.2</b>	<b>40.3</b>	<b>56.6</b>	<b>1.3</b>

**ORDER**

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

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

The Department hereby grants Air Emission License A-187-71-N-M, subject to the conditions found in Air Emission A-187-71-M-R/A, and the following conditions.

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

The following shall replace condition (16) F of Air Emission License A-187-71-M-R/A:

(16) Asphalt Plant (180 tons/hr)

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

<b>Pollutant</b>	<b>grs/dscf</b>	<b>lb/hr Natural Gas</b>	<b>lb/hr Distillate fuel, Spec. waste oil</b>
PM	0.03	6.51	6.51
PM <sub>10</sub>	-	6.51	6.51
SO <sub>2</sub>	-	0.83	15.84
NO <sub>x</sub>	-	45.00	21.60
CO	-	72.00	72.00
VOC	-	1.48	1.48

DONE AND DATED IN AUGUSTA, MAINE THIS 14 DAY OF August, 2018.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Core for  
PAUL MERCER, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-187-71-M-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: May 23, 2018

Date of application acceptance: May 23, 2018

Date filed with the Board of Environmental Protection:

This Order prepared by Benjamin Goundie, Bureau of Air Quality.

