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

DEPARTMENT ORDER

Maritimes & Northeast Pipeline, L.L.C. **Sagadahoc County** **Richmond, Maine** **A-745-71-L-R/M**	**Departmental** **Findings of Fact and Order** **Air Emission License** **Renewal and Amendment**

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

Maritimes & Northeast Pipeline, L.L.C. (M&N) has applied to renew their Air Emission License for the operation of emission sources associated with their natural gas compressor station.

The equipment addressed in this license is located at 547 Lincoln St, Richmond, Maine.

M&N has requested a decommissioned boiler be removed from their license, some minor changes to the licensed emission limits, and changes to the monitoring and operation of $SoLoNO_x^{TM}$ for Turbines #1 and #2. SO_2 emission rates have been updated to reflect AP-42's emission factor using the associated sulfur content provided by the gas tariff sheet.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Fuel Burning Equipment

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate (scf/hr)	Fuel Type	Date of Manuf.	Date of Install.	Stack #
Turbine #1	94.8	92,890	Natural Gas [A]	1999	1999	1
Turbine #2	94.8	92,890	Natural Gas [A]	1999	1999	2
Generator #1	5.0	4,903	Natural Gas [A]	1999	1999	N/A
Boiler #1 [B]	*1.6*	*1,575*	*Natural Gas [A]*	*1999*	*1999*	*BLR-1*

[A] Pipeline quality natural gas (1,020 Btu/scf)
[B] Removed from license.

M&N also has 16 small, natural gas-fired heaters not listed in the table above. These are considered insignificant emissions units because they are each rated below 1.0 MMBtu/hr, the heat input capacity at or above which would require their inclusion in the license; therefore, these small heaters are not addressed further in this license.

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

Additionally, M&N may operate portable engines used for maintenance or emergency-only purposes. These engines are considered insignificant activities and are not required to be included in this license. However, they may still be subject to applicable State and Federal regulations.

M&N does not currently operate a parts washer but would like to maintain the ability to add one in the future.

C. Definitions

Low-Load Operation means periods of operation during maintenance activities of the turbine that require operation at low load with SoLoNOx^{TM} Disabled, as recommended by the manufacturer.

Low Temperature Operation means operation at or below an ambient temperature of 0 °F.

Normal Operation means operation when NO_x control technology SoLoNO$_x^{TM}$ is Enabled and Active at temperatures above 0 °F. During normal operation, the majority of fuel fired in the turbines is lean-premixed fuel, and the balance is pilot fuel. When in normal operation, the turbine is considered to be achieving vendor guaranteed emissions rates.

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.

Shutdown means the time from when SoLoNO$_x$™ becomes Inactive to the end of fuel combustion.

Startup means the time from the start of fuel combustion to the time that SoLoNO$_x$™ becomes Active.

Transient Event means a period of time when SoLoNO$_x$™ is Enabled but also Inactive.

D. Application Classification

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

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

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

Pollutant	Current License (tpy)	Future License (tpy)	Net Change (tpy)	Significant Emissions Levels
PM	5.0	4.9	-0.1	100
PM_{10}	5.0	4.9	-0.1	100
$PM_{2.5}$	-	4.9	-	100
SO_2	2.4	4.2	+1.8	100
NO_x	66.8	66.3	-0.5	100
CO	92.6	92.3	-0.3	100
VOC	35.7	35.6	-0.1	100

This amendment does not include the addition of new equipment and will increase licensed emissions by less than 4 ton/year for each single pollutant not including greenhouse gases (GHG) and less than 8 ton/year for all pollutants combined not including GHG. This

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

E. Facility Classification

With the annual facility-wide emission limits, the facility is licensed as follows:

- As a synthetic minor source of air emissions for criteria pollutants, because M&N is subject to license restrictions that keep facility emissions below major source thresholds for NO_x, CO, and VOC; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

Emissions of CO are licensed above 80% of the major source threshold. Therefore, this facility is classified as an "80% Synthetic Minor" for the purpose of determining the minimum required compliance inspection frequency in accordance with Maine's Compliance Monitoring Strategy.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

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

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

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

B. Turbines #1 and #2

Turbines #1 and #2 are Solar Taurus Model 70 centrifugal simple cycle combustion turbines. Both were originally Taurus Model 70-9700 turbines but have since been replaced with Taurus Model 70-10300 turbines components, in accordance with the turbine replacement policy laid out below. They provide direct drive power to run compressors that are used to recompress and transport natural gas through the transmission pipeline. Each turbine has an approximate maximum heat input of 94.8 MMBtu/hr firing pipeline quality natural gas. Turbines #1 and #2 were manufactured in 1999 and installed in 1999.

Turbines #1 and #2 are each equipped with SoLoNO$_x$™, a NO$_x$ emissions reduction technology that combines premixing and lean fuel-air mixtures with a two-stage combustion zone, thereby reducing the flame temperature and the corresponding thermal NO$_x$ formation.

1. Turbine Replacement

   Solar no longer manufactures the Taurus 70-9700 units originally installed at this facility. M&N's license allows for the replacement of turbine core components with like-kind equipment without triggering additional New Source Performance Standards (NSPS) requirements. The Department has previously approved (A-744-71-C-M, issued on 9/19/2000) replacement at M&N's Baileyville station of a Taurus 70-9700 unit with a Taurus 70-10300 unit equipped with components that, together with software modifications, prevent the turbine from firing above the capacity of a Taurus 70-9700. This was determined to be like-kind exchange for which additional licensing action is not required. Emissions for each pollutant are based on the higher value for either a Taurus 70-9700 or a Taurus 70-10300.

   Since such replacements do not cause the affected facilities to be considered modified or reconstructed, M&N is not required to submit notification to EPA of turbine component replacement, nor are they required by NSPS applicable requirements to perform initial compliance testing after component replacement. However, M&N shall notify the Department when a replacement occurs, and the Department is not precluded from requiring compliance performance testing at any time.

2. 40 CFR Part 60, Subpart KKKK

   Stationary combustion turbines constructed, modified, or reconstructed after February 18, 2005, are subject to *Standards of Performance for Stationary Combustion Turbines*, Title 40 Code of Federal Regulations (40 C.F.R.) Part 60, Subpart KKKK (Subpart KKKK). The replacement described above involves the replacement of modular turbine core components and not the entire "stationary combustion turbine" which makes up the affected facility as defined by NSPS. In order to constitute a modification or reconstruction, the change would have to either result in an increase in emissions or exceed 50% of the fixed capital cost of a new facility. The replacement of the turbine core components does not meet either of these criteria. Therefore, the replacement of these components does not make the turbines subject to Subpart KKKK.

3. 40 CFR Part 60, Subpart GG

   Turbines #1 and #2 are subject to *Standards of Performance for Stationary Gas Turbines*, 40 C.F.R. Part 60, Subpart GG (Subpart GG). These turbines have maximum heat inputs of greater than 10 MMBtu/hr and were constructed after October 3, 1977.

Subpart GG contains NO_x and SO_2 emission standards for Turbines #1 and #2. However, the BPT emission limits contained in this license have been determined to be more stringent.

In order to not monitor the total sulfur content of the fuel combusted in the turbines, M&N has elected to keep records of tariff sheets to demonstrate gas quality characteristics as provided for in Subpart GG.

4. Operation at Low Temperature

Under normal operating conditions, the majority of the fuel is lean-premixed fuel and the balance is pilot fuel. However, the turbine control systems are programmed to increase pilot fuel when the ambient temperature drops below 0 °F to maintain combustion stability. As a result, emissions increase at these temperatures. This license includes provisions for increased emissions during periods when the ambient temperature falls below 0 °F.

5. Startup/Shutdown and Transient Events

As discussed in the BPT section below, emissions of NO_x, CO, and VOC are controlled using Solar's SoLoNO$_x^{TM}$ which is a technology based on dry, lean-premixed combustion.

SoLoNO$_x^{TM}$ can either be Enabled or Disabled, essentially either on or off. SoLoNO$_x^{TM}$ is typically Disabled during low load conditions such as startup and shutdown, and during low-temperature operation (see Definitions section) and low load operation as recommended by the manufacturer. The control systems for Turbines #1 and #2 are equipped with interlocks which prevents operating in SoLoNO$_x^{TM}$ Disabled mode except for periods of startup, shutdown, low-temperature, and low load operation as recommended by the manufacturer. Startup and shutdown events are estimated to take approximately nine minutes each with no more than two startups and two shutdowns in any given hour, for a total of 18 minutes of startup and 18 minutes of shutdown in an hour.

When Enabled, SoLoNO$_x^{TM}$ can be either Active or Inactive. A transient event occurs when SoLoNO$_x^{TM}$ is Enabled but Inactive. These are infrequent periods of short duration (typically a few minutes or less) when the turbine is not achieving the emissions guarantee provided by Solar. These periods occur as a result of the turbine losing combustion stability in the lean premix mode. To stabilize combustion, the turbine control system increases the pilot fuel to the combustion chamber, resulting in higher emissions until stable lean premix mode can be achieved again. The cause of transient events is usually outside the control of M&N, e.g., a bump/drop in pipeline pressure due to a large facility coming on/off-line.

Limiting the frequency of startups, shutdowns, low load, and transient events would not allow the facility to respond to demands of the natural gas pipeline as necessary to provide reliable and stable fuel supply to the region and is therefore not considered practicable for the facility. Therefore, the frequency of M&N's startups and shutdowns is unrestricted given the inconsistency of natural gas demands and M&N's role in providing reliable fuel supply. Emissions during startup, shutdown, low load, and transient events will be tracked and included in determining compliance with M&N's annual emission limitations.

M&N will continuously monitor the SoLoNO$_x$^{TM} system and whether it is Enabled/Disabled and Active/Inactive. M&N shall keep records of the date, time, and duration of all startups and shutdowns. In calculating compliance with the facility's annual emission limits, M&N shall determine the amount of operating time the turbine spent in each mode and calculate emissions based on the following:

Mode	**Calculate Emissions Using Emission Factors Based On …**
Startup	Emission data supplied by the turbine manufacturer at the time of the most recent permit application.
Shutdown	Emission data supplied by the turbine manufacturer at the time of the most recent permit application.
Normal Operation	Licensed emission limits for temperatures above 0 °F.
Low Temperature	Licensed emission limits for appropriate temperature range.
Low Load Operation	Licensed emission limits for temperatures less than or equal to -20 °F.
Transient Event	Licensed emission limits for temperatures less than or equal to -20 °F.

M&N shall keep records of the number of hours during the calendar year that the ambient temperature is at or below 0 °F and the number of hours during the calendar year that the ambient temperature is at or below -20 °F. Ambient temperature will be measured at the turbine inlet primarily, but meteorological data from an appropriate representative location may be used to fill any gaps in M&N's temperature data.

6. BPT Findings

The following control strategies represent BPT for Turbines #1 and #2:

PM/PM$_{10}$/PM$_{2.5}$	Good Combustion Practices
SO_2	Firing of Pipeline Quality Natural Gas
NO_x	SoLoNOx Combustion Technology
CO	SoLoNOx Combustion Technology
VOC	SoLoNOx Combustion Technology
HAP	Good Combustion Practices

The BPT emissions limits for the turbines were based on the following:

a. Particulate Matter (PM, PM_{10}, $PM_{2.5}$)
BPT for PM emissions from Turbines #1 and #2 consists of firing pipeline quality natural gas exclusively and good combustion practices. Units firing fuel with low ash content and high combustion efficiency exhibit low particulate matter emissions. The most stringent particulate control method demonstrated for gas turbines is the use of low ash fuel such as natural gas. Thus, firing only pipeline quality natural gas and maintaining good combustion practices represents BPT.

Turbines #1 and #2 are fuel burning equipment with rated capacities each greater than 3 MMBtu/hr; therefore, they are subject to *Fuel Burning Equipment Particulate Emission Standard*, 06-096 C.M.R. ch. 103. They are subject to a PM emission limit of 0.08 lb/MMBtu pursuant to § 2(B)(1)(b) of this rule because they have maximum heat input capacities between 50 and 250 MMBtu/hr and fire natural gas. Turbines #1 and #2 are subject to a lb/hr PM emission limit that corresponds to a much lower lb/MMBtu level than 0.08 lb/MMBtu; therefore, the Department finds that Turbines #1 and #2 meet the ch. 103 PM emission limit by meeting the PM lb/hr emission limits in the table below.

b. Sulfur Dioxide
Sulfur Dioxide (SO_2) is formed from the oxidation of sulfur in fuel. The most stringent method of control for SO_2 that has been demonstrated for gas-fired turbines is firing pipeline quality natural gas.

c. Nitrogen Oxides
Nitrogen Oxides (NO_x) emitted from combustion turbines result from the oxidation of both fuel-bound nitrogen and atmospheric nitrogen (thermal NO_x). Natural gas has very low fuel-bound nitrogen; therefore, reducing NO_x emissions must focus on reducing the thermal NO_x component. M&N uses SoLoNO$_x^{TM}$ combustion technology, which employs lean-premixed combustion techniques. The premixing of fuel and air upstream of the primary combustion zone helps to ensure that the flame operates at a fuel-lean condition, thus lowering flame temperature and minimizing thermal NO_x formation.

The SoLoNO$_x^{TM}$ combustion technology includes augmented backside cooled (ABC) liners and an advanced thermal barrier coating (TBC). The ABC liners eliminate air injection into the combustor for wall cooling. The wall temperatures are controlled exclusively through convective cooling by high velocity air flow on the cold side of the liner. The TBC is a zirconia-based material that is plasma-sprayed onto the liner which reduces wall temperature. The ABC/TBC combination allows operation without air injection for cooling of the combustor liner, which eliminates quenching along the walls and thereby reduces CO emissions. The reduction of CO levels also allows the combustor to be operated at lower flame temperatures, which reduces NO_x formation.

The Department determined BPT for NO_x emissions consists of operating Turbines #1 and #2 with SoLoNO$_x^{TM}$ combustion technology. NSPS, Subpart GG contains a NO_x emissions limit of 150 ppmvd at 15% O_2. The BPT emission limits for NO_x for all ambient temperatures as listed in the table below have been determined to be more stringent than the NSPS limit.

d. Carbon Monoxide
Carbon Monoxide (CO) results from incomplete combustion of gas in the turbine.

The gas turbine uses a dry low-NO_x combustor system, integrates sophisticated burner controls with staged premixed combustion zones, and uses fuel feed systems to achieve the required low-NO_x emissions. Additional CO reductions are attributed to the SoLoNO$_x^{TM}$ technology.

The Department determined M&N's use of SoLoNO$_x^{TM}$ combustion technology and associated good combustion practices and instrumentation and controls for CO along with ambient temperature specific limits contained in the table below, represents BPT.

e. Volatile Organic Compounds
The majority of volatile organic compounds (VOC) emitted from gas-fired turbines comes from unburned hydrocarbons. Control of VOC is accomplished by providing adequate fuel residence time and adequately high temperature in the combustion zone to ensure complete combustion. The Department determined BPT for VOC is using the SoLoNO$_x^{TM}$ combustion technology along with the ambient temperature specific limits contained in the table below.

7. Summary of Emission Limits

Except during periods of startup, shutdown, low load, and transient events, Turbines #1 and #2 each shall not exceed the following emission limits.

Pollutant	Emission Limit T > 0 °F	Emission Limit 0 °F ≥ T > -20 °F	Emission Limit T ≤ -20 °F & Transient Event
PM	0.63 lb/hr	0.66 lb/hr	0.66 lb/hr
PM_{10}	0.63 lb/hr	0.66 lb/hr	0.66 lb/hr
$PM_{2.5}$	0.63 lb/hr	0.66 lb/hr	0.66 lb/hr
SO_2	0.47 lb/hr	0.53 lb/hr	0.53 lb/hr
NO_x	25 ppmdv @ 15% O_2	42 ppmdv @ 15% O_2	120 ppmdv @ 15% O_2
NO_x	8.54 lb/hr	15.2 lb/hr	43.41 lb/hr
CO	10.40 lb/hr	22.02 lb/hr	33.04 lb/hr
VOC	0.65 lb/hr	1.38 lb/hr	2.07 lb/hr

[06-096 C.M.R. ch. 115, BPT]

8. Visible Emissions

   Visible emissions from Turbines #1 and #2 shall each not exceed 10% opacity on a six-minute block average basis.

9. Gas Releases: Turbine Case Venting

   When a turbine sits idle for some time, it is decompressed and vented to atmosphere to prevent damage to equipment. The turbine is also decompressed and vented when maintenance work is done on the turbine. M&N shall keep records of the date and time of each turbine case venting as well as the amount (scf) of gas vented.

C. Generator #1

M&N operates one emergency generator, Generator #1. Generator #1 is a Waukesha H24GL 4-stroke generator rated at 5.00 MMBtu/hr (395 kW) which fires natural gas and was manufactured in 1999.

1. BPT Findings

   The BPT emission limits for Generator #1 are based on the following:

$PM/PM_{10}/PM_{2.5}$	–	0.12 lb/MMBtu, 06-096 C.M.R. ch. 103
SO_2	–	5.88×10^{-4} lb/MMBtu from AP-42 dated 10/24
NO_x	–	524.30 lb/MMscf from manufacturer's data
CO	–	458.77 lb/MMscf from manufacturer's data
VOC	–	196.61 lb/MMscf from manufacturer's data
Visible Emissions	–	06-096 C.M.R. ch. 115, BPT

   The BPT emission limits for Generator #1 are the following:

Unit	Pollutant	lb/MMBtu
Generator #1	PM	0.12

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #1	0.60	0.60	0.60	-	2.57	2.25	0.96

   Visible emissions from Generator #1 shall not exceed 10% opacity on a six-minute block average basis.

   The Department has determined that the BPT visible emission limit is more stringent than the applicable limit in 06-096 C.M.R. ch. 101. Therefore, the visible emission limit for Generator #1 has been streamlined to the more stringent BPT limit, and only this more stringent limit shall be included in the air emission license.

2. Chapter 169

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

3. New Source Performance Standards (NSPS)

   Due to the date of manufacture of the spark ignition emergency engine listed above, Generator #1 is not subject to the NSPS *Standards of Performance for Spark Ignition Internal Combustion Engines (SI ICE),* 40 C.F.R. Part 60, Subpart JJJJ since the unit was manufactured prior to January 1, 2009. [40 C.F.R. § 60.4230]

4. National Emission Standards for Hazardous Air Pollutants (NESHAP):
   40 C.F.R. Part 63, Subpart ZZZZ

   National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63, Subpart ZZZZ (Subpart ZZZZ) is applicable to the emergency engine listed above. The unit is considered an existing, emergency stationary reciprocating internal combustion engine at an area HAP source and is not subject to New Source Performance Standards regulations. EPA's August 9, 2010 memo (*Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE*) specifically does not exempt these units from the federal requirements. [40 C.F.R. § 63.6585]

   A summary of the currently applicable Subpart ZZZZ requirements is listed below.

   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.

Generator #1 shall be limited to the usage outlined in 40 C.F.R. § 63.6640(f) and therefore may be classified as an existing emergency stationary RICE as defined in Subpart ZZZZ. Failure to comply with all of the requirements listed in 40 C.F.R. § 63.6640(f) may cause this engine to not be considered an emergency engine and therefore subject to all applicable requirements for non-emergency engines.

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

(1) Operation and Maintenance Requirements
(40 C.F.R. § 63.6603(a) and Table 2(d))

	Operating Limitations
Spark ignition (natural gas) unit: (Generator # 1)	- Change oil and filter every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first; - Inspect spark plugs every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and - Inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

Generator #1 shall be operated and maintained according to the manufacturer's emission-related written instructions, or M&N shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
[40 C.F.R. § 63.6625(e)]

(2) Optional Oil Analysis Program
M&N 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, M&N must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 C.F.R. § 63.6625(i)]

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

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

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

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

D. NSPS for Crude Oil and Natural Gas Facilities

M&N is not subject to any of the following NSPS regulations:

- *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015*, 40 C.F.R. Part 60 Subpart OOOO;
- *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015 and On or Before December 6, 2022*, 40 C.F.R. Part 60 Subpart OOOOa; nor
- *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After December 6, 2022*, 40 C.F.R. Part 60 Subpart OOOOb.

The facility is a compressor station constructed prior to the applicability dates of all three rules and that has not undergone a modification or reconstruction as defined by NSPS regulations.

E. Parts Washer

Currently there is no parts washer in service at the Richmond compressor station. However, M&N wishes to retain the option to operate a degreaser in accordance with *Solvent Cleaners,* 06-096 C.M.R. ch. 130.

F. Gas Releases and Fugitive Emissions

Operation of the facility's equipment and plant piping will result in fugitive emissions of natural gas. M&N shall calculate fugitive emissions on a calendar year basis using estimates for similar sized stations and a statistical analysis of available gas quality data.

These fugitive emissions (including VOC and methane) shall be reported to the Department annually as part of the facility's emissions inventory collected per *Emission Statements*, 06-096 C.M.R. ch. 137.

Emergency shutdowns (ESD), ESD testing, and routine maintenance of station piping result in venting natural gas to the atmosphere. These activities are necessary for safety reasons, and no emission limit is imposed intending to restrict these activities. However, emissions from these activities shall be included in the annual emissions inventory submitted pursuant to 06-096 C.M.R. ch. 137.

M&N shall notify the Department in advance of any scheduled venting event that is expected to result in the release of more than 85,000 scf of natural gas. M&N shall notify the Department within two working days of any unscheduled venting event that results in the release of more than 85,000 scf of natural gas.

M&N shall maintain a log of all gas releases and ESD events that includes the following information:

1. Date of the event;
2. Estimated or actual event start time;
3. Estimated or actual event duration;
4. Release source;
5. Event type (shutdown, maintenance, testing, or malfunction);
6. Description of event;
7. Estimate of the amount of natural gas vented;
8. Estimate of VOC density of the released gas; and
9. Calculation of the tons of VOC emitted based on the VOC content of the gas released.

G. Annual Emission Limits

Total emissions from all sources at the facility addressed in this air emission license shall not exceed the following on a 12-month rolling total basis:

Pollutant	Tons/year
PM	4.9
PM_{10}	4.9
$PM_{2.5}$	4.9
SO_2	4.2
NO_x	66.3
CO	92.3
VOC	35.6
Single HAP	9.9
Total HAP	9.9

Compliance shall be demonstrated by recordkeeping and calculations of actual emissions performed at least once annually. Additional calculations of emissions to demonstrate compliance with these limits on a 12-month rolling basis shall be performed at the request of the Department.

H. Fugitive Emissions of Particulate Matter

M&N 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.

M&N 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.

I. General Process Emissions

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

J. Performance Test Protocol

For any performance testing required by this license, M&N shall submit to the Department for approval a performance test protocol, as outlined in the Department's Performance Testing Guidance, at least 30 days prior to the scheduled date of the performance test. [06-096 C.M.R. ch. 115, BPT]

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

K. Emission Statements

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

1. The amount of natural gas fired in each unit on a monthly basis;
2. Calculations of emissions of all regulated pollutants from each emissions unit on a calendar year total basis;
3. Calculations of the VOC and/or HAP emissions from gas releases and fugitive emissions on a calendar year total basis; and
4. Hours of operation for each emission unit on a monthly basis.

Every third year, or as requested by the Department, M&N shall report to the Department emissions of hazardous air pollutants as required pursuant to 06-096 C.M.R. ch. 137, § (3)(C). The next report is due no later than May 15, 2027, for emissions occurring in calendar year 2026. The Department will use these reports to calculate and invoice for the applicable annual air quality surcharge for the subsequent three billing periods. M&N 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)]

L. 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:

- Turbines #1 and #2 emission limits were calculated based on ambient temperature data indicating 81 hours per year of operation at ambient temperatures less than or equal to 0 °F and 20 hours per year of low load operation;
- 8,760 hours per year each of operation on Turbines #1 and #2 including 65 startup and shutdown events per year; and
- Operating Generator #1 for 100 hrs/yr of non-emergency operation.

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**
Turbine #1	2.4	2.4	2.4	2.1	33.1	46.1	2.6
Turbine #2	2.4	2.4	2.4	2.1	33.1	46.1	2.6
Generator #1	0.1 *	0.1 *	0.1 *	-	0.1	0.1	0.1
Gas Releases & Fugitives	-	-	-	-	-	-	30.3
Total TPY	**4.9**	**4.9**	**4.9**	**4.2**	**66.3**	**92.3**	**35.6**

* Because the estimated emission is small but not zero, this value is rounded to the nearest tenth of a ton.

Pollutant	**Tons/year**
Single HAP	9.9
Total HAP	9.9

III. AMBIENT AIR QUALITY ANALYSIS

M&N previously submitted an ambient air quality impact analysis outlined in air emission license A-745-71-A-N (dated December 18, 1998) demonstrating that emissions from the facility, in conjunction with all other sources, do not violate Ambient Air Quality Standards (AAQS). An additional air quality impact analysis is not required for this renewal.

ORDER

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

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

The Department hereby grants Air Emission License A-745-71-L-R/M subject to the following conditions.

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

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

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

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

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction,

reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 C.M.R. ch. 115]

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S. § 353-A. [06-096 C.M.R. ch. 115] Payment of the annual air emission license fee for M&N is due by the end of November of each year. [38 M.R.S. § 353-A(3)]

(6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 C.M.R. ch. 115]

(7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 C.M.R. ch. 115]

(8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 C.M.R. ch. 115]

(9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 C.M.R. ch. 115]

(10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 C.M.R. ch. 115]

(11) In accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department, the licensee shall:

A. Perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
   1. Within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
   2. Pursuant to any other requirement of this license to perform stack testing.

B. Install or make provisions to install test ports that meet the criteria of 40 C.F.R. Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

C. Submit a written report to the Department within thirty (30) days from date of test completion.

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

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

A. Within thirty (30) days following receipt of the written test report by the Department, or another alternative timeframe approved by the Department, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 C.F.R. Part 60 or other method approved or required by the Department; and

B. The days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

C. The licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

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

(13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or license requirement. [06-096 C.M.R. ch. 115]

(14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 C.M.R. ch. 115]

(15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 C.M.R. ch. 115]

(16) The licensee shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard. [38 M.R.S. § 605]

SPECIFIC CONDITIONS

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

A. Turbines #1 and #2 shall only fire pipeline-quality natural gas. [06-096 C.M.R. ch. 115, BPT]

B. Except during periods of startup, shutdown, and low-load, Turbines #1 and #2 each shall not exceed the following emissions limits:

Pollutant	Emission Limit T > 0 °F	Emission Limit 0 °F ≥ T > -20 °F	Emission Limit T ≤ -20 °F & Transient Events
PM	0.63 lb/hr	0.66 lb/hr	0.66 lb/hr
PM_{10}	0.63 lb/hr	0.66 lb/hr	0.66 lb/hr
$PM_{2.5}$	0.63 lb/hr	0.66 lb/hr	0.66 lb/hr
SO_2	0.47 lb/hr	0.53 lb/hr	0.53 lb/hr
NO_x	25 ppmdv @ 15% O_2	42 ppmdv @ 15% O_2	120 ppmdv @ 15% O_2
NO_x	8.54 lb/hr	15.2 lb/hr	43.41 lb/hr
CO	10.40 lb/hr	22.02 lb/hr	33.04 lb/hr
VOC	0.65 lb/hr	1.38 lb/hr	2.07 lb/hr

[06-096 C.M.R. ch. 115, BPT]

C. Visible emissions from Turbines #1 and #2 shall each not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(4)]

D. Compliance with the emission limits associated with Turbines #1 and #2 shall be demonstrated in accordance with the appropriate test methods upon request by the Department. [06-096 C.M.R. ch. 115, BPT]

E. M&N shall keep records of the number of hours during the calendar year that the ambient temperature is at or below 0 °F and the number of hours during the calendar year that the ambient temperature is at or below -20 °F. Ambient temperature will be measured at the turbine inlet primarily, but meteorological data from an appropriate

representative location may be used to fill any gaps in M&N's temperature data. [06-096 C.M.R. ch. 115, BPT]

F. M&N shall not operate Turbines #1 or #2 in SoLoNO$_x^{TM}$ Disabled mode except for periods of startup, shutdown, low temperature, and low-load operation as recommended by the manufacturer. Compliance shall be demonstrated by continuously monitoring the SoLoNO$_x^{TM}$ system and whether it is Enabled/Disabled. [06-096 C.M.R. ch. 115, BPT]

G. M&N shall continuously monitor the SoLoNO$_x^{TM}$ system on Turbines #1 and #2 during all operating times, whether it is Enabled/Disabled and Active/Inactive. M&N shall keep records of the date, time, and duration of all startups, shutdowns, and low load operation. [06-096 C.M.R. ch. 115, BPT]

H. M&N shall keep documentation of all maintenance and repairs, both planned and unplanned and including parts replacement, performed on either Turbine #1 or #2 and any associated control equipment. The documentation shall include the date maintenance occurred and a description of the action performed including which parts were replaced, if applicable. These records shall be made available to the Department upon request. [06-096 C.M.R. ch. 115, BPT]

I. Turbines #1 and #2 are each subject to, and shall comply with, the applicable requirements of 40 C.F.R. Part 60, Subpart GG.

J. M&N shall maintain a current FERC gas tariff sheet specifying gas quality, which documents the total sulfur content is 20.0 grains of sulfur or less per 100 scf of gas or otherwise comply with the specified methods for demonstrating compliance with the fuel sulfur content requirements of 40 C.F.R. § 60.334(h)(3).

K. M&N may install like-kind manufacturer-supplied replacement components for the turbines that occur either as part of scheduled maintenance of a turbine or in the event of a malfunction or outage and subsequent repair. M&N shall supply the Department written notification in advance of any replacement of turbine components and shall still be subject to and responsible for any applicable NSPS provisions with respect to replacement of the turbine or any components. [06-096 C.M.R. ch. 115, BPT]

L. Parameter Monitors

1. M&N shall monitor and record the following parameters. [06-096 C.M.R. ch. 115, BPT]

Parameter	Monitor	Record Monitor Data	Total
Natural Gas Fuel Flow Rate to Each Turbine (actual cubic feet input)	Continuously [A]	Continuously [A]	Monthly
SoLoNOx™ Enabled/Disabled Status on Each Turbine	Continuously [B]	Continuously [B]	Monthly (minutes)
SoLoNOx™ Active/Inactive Status on Each Turbine	Continuously [B]	Continuously [B]	Monthly (minutes)

[A] For this parameter, *Continuously* means the total fuel flow will be recorded at least once per each 15-minute period during turbine operation.

[B] For this parameter, *Continuously* means the total minutes for each status will be recorded at least once per 15-minute period during turbine operation.

2. 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 and 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 satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions. [06-096 C.M.R. ch. 115, BPT]

(18) **Generator #1**

A. Generator #1 shall be limited to 100 hours of operation per calendar year, excluding operating during emergency situations. [06-096 C.M.R. ch. 115, BPT]

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

Unit	Pollutant	lb/MMBtu
Generator #1	PM	0.12

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #1	0.60	0.60	0.60	-	2.57	2.25	0.96

C. Visible Emissions

Visible emissions from Generator #1 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

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

1. M&N shall meet the following operational limitations for Generator #1:

   a. Change the oil and filter every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first;
   b. Inspect spark plugs every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and
   c. Inspect the hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

   Records shall be maintained documenting compliance with these operational limitations.

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

2. Oil Analysis Program Option
   M&N 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, M&N must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for each engine. The analysis program must be part of the maintenance plan for each engine. [40 C.F.R. § 63.6625(i)]

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on Generator #1. [40 C.F.R. § 63.6625(f)]

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

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

of all engine operating hours. [40 C.F.R. § 63.6640(f) and 06-096 C.M.R. ch. 115]

b. M&N shall keep records that include maintenance conducted on Generator #1 and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. §§ 63.6655(e) and (f)]

5. Operation and Maintenance
   The engine shall be operated and maintained according to the manufacturer's emission-related written instructions, or M&N shall develop a maintenance plan which provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 C.F.R. § 63.6625(e)]
   M&N shall have available for review by the Department a copy of the manufacturer's emission-related written instructions for engine operation and maintenance. [06-096 C.M.R. ch. 115, BPT]

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

(19) **Parts Washer**

Parts washers at M&N are subject to *Solvent Cleaners*, 06-096 C.M.R. ch. 130.

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

B. The following are exempt from the requirements of 06-096 C.M.R. ch. 130 [06-096 C.M.R. ch. 130]:
   1. Solvent cleaners using less than two liters (68 oz.) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
   2. Wipe cleaning; and,
   3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.

C. The following standards apply to cold cleaning machines that are applicable sources under 06-096 C.M.R. ch. 130.
   1. M&N shall attach a permanent conspicuous label to each unit summarizing the

following operational standards:

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

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

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

(20) **Gas Releases and Fugitive Emissions**

A. M&N shall maintain a log of all gas releases and ESD events that includes the following information:

1. Date of the event;
2. Estimated or actual event start time;
3. Estimated or actual event duration;
4. Release source;
5. Event type (shutdown, maintenance, testing, or malfunction);
6. Description of event;
7. Estimate of the amount of natural gas vented;
8. Estimate of VOC density of the released gas; and
9. Calculation of the tons of VOC emitted based on the VOC content of the gas released.

[06-096 C.M.R. ch. 115, BPT]

B. M&N shall notify the Department in advance of any scheduled venting event that is expected to result in the release of more than 85,000 scf of natural gas. M&N shall

notify the Department within two working days of any unscheduled venting event that results in the release of more than 85,000 scf of natural gas. [06-096 C.M.R. ch. 115, BPT]

(21) **Annual Emission Limits**

A. Total emissions from all sources at the facility addressed in this air emission license shall not exceed the following on a 12-month rolling total basis. [06-096 C.M.R. ch. 115, BPT]

Pollutant	Tons/year
PM	4.9
PM_{10}	4.9
$PM_{2.5}$	4.9
SO_2	4.2
NO_x	66.3
CO	92.3
VOC	35.6
Single HAP	9.9
Total HAP	9.9

B. As part of documenting compliance with the annual emission limits listed above, M&N shall include turbine emissions from startup, shutdown, normal operation, low-temperature operation, low load, and transient events and calculate turbine emissions based on the following:

Mode	Calculate Emissions Using Emission Factors Based On …
Startup	Emission data supplied by the turbine manufacturer at the time of the most recent permit application.
Shutdown	Emission data supplied by the turbine manufacturer at the time of the most recent permit application.
Normal Operation	Licensed emission limits for temperatures above 0 °F.
Low Temperature	Licensed emission limits for appropriate temperature range.
Low Load Operation	Licensed emission limits for temperatures less than or equal to -20 °F.
Transient Event	Licensed emission limits for temperatures less than or equal to -20 °F.

[06-096 C.M.R. ch. 115, BPT]

C. M&N shall keep monthly records sufficient to document the facility's emissions on a 12-month rolling total basis and shall make these records available to the Department upon request. [06-096 C.M.R. ch. 115, BPT]

(22) **Fugitive Emissions of Particulate Matter**

A. M&N 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. M&N 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)]

(23) **General Process Sources**

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

(24) **Performance Test Protocol**

For any performance testing required by this license, M&N shall submit to the Department for approval a performance test protocol, as outlined in the Department's Performance Testing Guidance, at least 30 days prior to the scheduled date of the performance test. [06-096 C.M.R. ch. 115, BPT]

(25) **Annual Emission Statements**

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

1. The amount of natural gas fired in each unit on a monthly basis;
2. Calculations of emissions of all regulated pollutants from each emissions unit on a calendar year total basis;
3. Calculations of the VOC and/or HAP emissions from gas releases and fugitive emissions on a calendar year total basis; and
4. Hours of operation for each emission unit on a monthly basis.

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

C. Every third year, or as requested by the Department, M&N shall report to the Department emissions of hazardous air pollutants as required pursuant to 06-096 C.M.R. ch. 137, § (3)(C). The next report is due no later than May 15, 2027, for emissions occurring in calendar year 2026. M&N 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)]

(26) If the Department determines that any parameter value pertaining to construction and operation of the emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, M&N may be required to submit additional information. Upon written request from the Department, M&N shall provide information necessary to demonstrate AAQS will not be exceeded, potentially including submission of an ambient air quality impact analysis or an application to amend this air emission license to resolve any deficiencies and ensure compliance with AAQS. Submission of this information is due within 60 days of the Department's written request unless otherwise stated in the Department's letter.
[06-096 C.M.R. ch. 115, § 2(O)]

DONE AND DATED IN AUGUSTA, MAINE THIS 8th DAY OF APRIL, 2026.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____ for _____
MELANIE LOYZIM, COMMISSIONER

The term of this license shall be ten (10) years from the signature date above.

[Note: If a renewal application, determined as complete by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 M.R.S. § 10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the license renewal application.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: February 28, 2025
Date of application acceptance: February 28, 2025

This Order prepared by Zac Hicks, Bureau of Air Quality.