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

DEPARTMENT ORDER

Eagle Point Energy Center, LLC **Penobscot County** **Orrington, Maine** **A-355-77-2-M**	**Departmental** **Findings of Fact and Order** **New Source Review** **NSR #2**

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

FACILITY	Eagle Point Energy Center, LLC
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Revision
NAICS CODES	562213
NATURE OF BUSINESS	Municipal Waste Combustion and Materials Recovery
FACILITY LOCATION	29 Industrial Way, Orrington, Maine

B. NSR License Description

Eagle Point Energy Center, LLC (EPEC) has requested a New Source Review (NSR) license to perform a like kind replacement of the Lime Slaker and Lime Silo.

C. Emission Equipment

The following equipment is addressed in this NSR license:

Process Equipment

Equipment	Pollution Control Equipment
*Lime Silo**	*Baghouse/Fabric Filters*
Lime Silo	Baghouse/Fabric Filters
Lime Slaker	Induced draft wet scrubber

* This licensing action involves replacing the Lime Silo and Lime Slaker with new units.

D. Project Description

Emissions of sulfur dioxide (SO_2) and acid gases from the Municipal Waste Combustors are controlled by the use of a spray dryer absorber followed by fabric filters. In the spray dryer absorber, lime slurry is atomized and introduced into flue gases. The atomized slurry absorbs SO_2 and acid gases from the flue gas. Quicklime is delivered to and stored in the Lime Silo before being transferred to the Lime Slaker, where it is mixed with water to create the slurry used by the spray dryer absorber. EPEC has proposed the replacement of the existing Lime Silo and Lime Slaker with new units.

The replacement Lime Silo and Lime Slaker will not result in any increase in either permitted or actual emissions. The new slaking system will be equipped with an induced draft wet scrubber for control of particulate emissions. This is an improvement over the existing system that simply exhausts through a vent. The new Lime Silo will be equipped with a baghouse system equivalent to that on the old Lime Silo. Currently licensed visible emission limits for the Lime Silo were established in air emission license A-355-70-E-R as Best Practical Treatment (BPT). The Department finds that the replacement Lime Silo and Lime Slaker will achieve BPT for control of emissions from the Municipal Waste Combustors.

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.

Pursuant to § 2(R) of *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115, replacement of an existing air pollution control system may be considered a minor revision provided the new equipment achieves BPT. As discussed previously, the Lime Slaker and Lime Silo are integral parts of the spray dryer absorber used to control SO_2 and acid gas emissions from the Municipal Waste Combustors, and the replacement Lime Slaker and Lime Silo will achieve BPT. Therefore, this application has been processed as a minor revision in accordance with 06-096 C.M.R. ch. 115.

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

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

B. Lime Silo and Lime Slaker Replacement

EPEC will replace the existing slaking system, consisting of the Lime Slaker and Lime Silo, with like-kind units. The Lime Silo will be equipped with a bag house system for control of particulate matter emissions. The Lime Slaker will be equipped with an induced draft wet scrubber for control of particulate matter emissions.

1. Lime Silo

   a. EPEC shall maintain and operate a baghouse to control emissions during Lime Silo filling operations. Filling operations shall not be conducted without the proper use of the baghouse. [06-096 C.M.R. ch. 115, BACT]

   b. EPEC shall maintain monthly records of the quantity of lime loaded to the silo and maintenance conducted on the baghouse. Documentation of maintenance of the baghouse shall include records of the date and location of all bag failures, the date and description of all routine maintenance, and the date and results of all inspections. [06-096 C.M.R. ch. 115, BACT]

   c. Visible emission from the Lime Silo shall not exceed 10% opacity on a six (6) minute block average basis. [06-096 C.M.R. ch. 101, § 4 B (3)]

2. Lime Slaker

   EPEC shall operate a wet scrubber according to the manufacturer's specifications whenever the Lime Slaker is in operation. EPEC shall perform regular inspections of the scrubber and maintain records documenting such inspections and any maintenance conducted on the scrubber. [06-096 C.M.R. ch. 115, BACT]

   Visible emissions from the Lime Slaker wet scrubber shall not exceed 20% opacity on a six (6) minute block average basis. [06-096 C.M.R. ch. 101, § 4 B (4)]

C. Annual Emissions

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

ORDER

The Department hereby grants New Source Review Minor Revision A-355-77-2-M pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the specific conditions below.

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

SPECIFIC CONDITIONS

(1) Lime Silo and Lime Slaker

A. EPEC is licensed to replace the Lime Silo and Lime Slaker. The new Lime Silo and Lime Slaker shall be subject to all applicable requirements and conditions as the previous units. [06-096 C.M.R. ch. 115, BPT]

B. EPEC shall maintain and operate a baghouse to control emissions during Lime Silo filling operations. Filling operations shall not be conducted without the proper use of the baghouse. [06-096 C.M.R. ch. 115, BACT]

C. EPEC shall maintain monthly records of the quantity of lime loaded to the silo and maintenance conducted on the baghouse. Documentation of maintenance of the baghouse shall include records of the date and location of all bag failures, the date and description of all routine maintenance, and the date and results of all inspections. [06-096 C.M.R. ch. 115, BACT]

D. EPEC shall operate a wet scrubber according to the manufacturer's specifications whenever the Lime Slaker is in operation. EPEC shall perform regular inspections of the scrubber and maintain records documenting such inspections and any maintenance conducted on the scrubber. [06-096 C.M.R. ch. 115, BACT]

E. Visible emission from the Lime Silo shall not exceed 10% opacity on a six (6) minute block average basis. [06-096 C.M.R. ch. 101, § 4 B (3)]

F. Visible emissions from the Lime Slaker wet scrubber shall not exceed 20% opacity on a six (6) minute block average basis. [06-096 C.M.R. ch. 101, § 4 B (4)]

G. Approval to construct the new Lime Silo and Lime Slaker shall become invalid if the source has not commenced construction within eighteen (18) months after issuance of this license amendment 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]

(2) If the Department determines that any parameter value pertaining to construction and operation of the emissions units, including but not limited to stack size, configuration, flow rate, emission rates, nearby structures, etc., deviates from what was submitted in the application or ambient air quality impact analysis for this air emission license, EPEC may be required to submit additional information. Upon written request from the Department, EPEC 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, 2025.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____ for _____
MELANIE LOYZIM, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: January 9, 2025
Date of application acceptance: January 9, 2025

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