



PAUL R. LEPAGE  
GOVERNOR

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PATRICIA W. AHO  
COMMISSIONER

McCain Foods USA, Inc. )  
Aroostook County )  
Easton, Maine )  
A-436-77-4-M )

**Departmental  
Findings of Fact and Order  
New Source Review  
NSR #4**

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and 590, the Department finds the following facts:

**I. REGISTRATION**

**A. Introduction**

FACILITY	McCain Foods USA, Inc. (McCain)
PART 70 LICENSE NUMBER	A-436-70-A-I
LICENSE TYPE	06-096 CMR 115, Minor Revision
NAICS CODE	311411
NATURE OF BUSINESS	Frozen Potato Products
FACILITY LOCATION	Easton, Maine

McCain Foods USA, Inc. (McCain) of Easton, Maine is licensed to operate emission sources associated with their potato processing facility. The facility is located off Richardson Road in Easton, Maine on approximately nine acres of property. This minor revision addresses the facility's request to clarify that the facility can fire #2 fuel oil as back-up to the natural gas supply.

**B. Application Classification**

McCain's application was submitted pursuant to the minor revision procedures in 06-096 CMR 115 (as amended). The application for McCain does not violate any applicable federal or state requirements, does not include new fuel burning or process equipment, and does not increase emissions of any pollutant. Therefore, this clarification is determined to be a minor revision for New Source Review under 06-096 CMR 115 (as amended) and has been processed as such.

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## II. DESCRIPTION OF MINOR REVISION

The New Source Review (NSR) Amendment #3 (A-436-77-3-M) issued April 6, 2012 states the following:

“McCain has requested through this minor revision to add the option to combust natural gas in Boilers #5, #8, and #9 as an alternative fuel. McCain needs to retain the option of burning fuel oil and vegetable oil in each of these boilers, as well as biogas in Boilers #8 and #9, in the event of logistical or supply problems with receiving natural gas.”

McCain had intended to use #6 fuel oil (0.5% sulfur content by weight) as the back-up fuel which the facility is clearly licensed to burn, however, the facility now requests to clarify that the “burning of fuel oil” as licensed in A-436-77-3-M should also include #2 fuel oil as back-up. McCain is proceeding forward with the natural gas conversion project, but it will take some time to develop due to infrastructure upgrade requirements for the bulk compressed natural gas system of its supplier.

In developing the natural gas project, McCain had assumed that the facility would be using natural gas and utilize #6 fuel oil as emergency back-up for extended periods of downtime. However, the natural gas supplier indicated that there is sufficient risk of operational interruption and that McCain needs to have a fuel that can be used more readily and easily available than #6 fuel oil which can't be stored for long periods without deterioration, requires continuous heating, and must be used regularly. Therefore, McCain has requested to include the use of #2 fuel oil as back-up to the natural gas supply and will only be used as emergency back-up for periods when natural gas supply is interrupted. McCain plans to convert the boiler burner tips to allow the use of #2 fuel oil, clean the fuel oil system, and use one of the fuel oil tanks as a #2 fuel oil storage tank.

As a separate clarification, the natural gas will be delivered to the Easton site as compressed natural gas (CNG) instead of liquefied natural gas (LNG) as described on page (3) of Air Emissions License, A-436-77-3-M. The natural gas fuel McCain will fire in the boilers will be the same quality at the boiler burner tip regardless of the delivery method to the site. No changes in emissions will occur from this difference in delivery of the natural gas.

Based on the information submitted by McCain, the Department approves McCain's request which clarifies and includes the use of #2 fuel oil as a back-up fuel. The air pollutant emission factors for #2 fuel oil are the same or lower than those for #6 fuel oil. Therefore, all criteria pollutant emissions limits in McCain's current air emission license will be met with the use of #2 fuel oil.

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In order to maintain air permit and operational flexibility, McCain needs to retain the currently licensed options of using, at any time, #6 fuel oil and vegetable oil in Boilers #5, #8, and #9, as well as biogas in Boilers #8 and #9. McCain plans to burn biogas in conjunction with natural gas.

### 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-436-77-4-M pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the conditions below.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License 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) McCain is licensed to burn #2 fuel oil as a back-up fuel when the natural gas supply to their existing boilers is unavailable or interrupted. McCain shall maintain records of the amount of #2 fuel oil used. [06-096 CMR 115, BPT]
- (2) McCain shall submit an application to incorporate this amendment into the Part 70 air emission license no later than 12 months from commencement of the requested operation. [06-096 CMR 140, Section 2(J)(2)(c)]

DONE AND DATED IN AUGUSTA, MAINE THIS 22<sup>nd</sup> DAY OF August, 2012

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Patricia W. Aho*  
PATRICIA W. AHO, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: July 5, 2012

Date of application acceptance: July 19, 2012

Date filed with the Board of Environmental Protection:

This Order prepared by Edwin Cousins, Bureau of Air Quality



