Maine Woods Pellet Company, LLC,
Athens Capital Holdings, LLC, &
Athens Energy LLC
Somerset County
Athens, Maine
A-989-77-1-A

Departmental
Findings of Fact and Order
New Source Review
NSR #1

FINDINGS OF FACT

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 Maine Revised Statutes Annotated (M.R.S.A.), Section 344 and Section 590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Maine Woods Pellet Company, LLC, Athens Capital Holdings, LLC, & Athens Energy LLC
LICENSE TYPE	06-096 CMR 115, Minor Modification
NAICS CODES	321999
NATURE OF BUSINESS	Wood Pellet Manufacturer
FACILITY LOCATION	164 Harmony Rd, Athens, Maine

B. Amendment Description

Maine Woods Pellet Company, LLC (MWP), along with co-applicants Athens Capital Holdings, LLC and Athens Energy LLC, has requested an amendment to their license in order to include two internal combustion engines operating on-site as well as to address the use and operation of a parts washer.

C. Emission Equipment

The following equipment is addressed in this air emission license:

Engines

Equipment	Power Output	Heat Input (MMBtu/hr)	Fuel Type, % sulfur	Date of Manf.
Fire Pump Engine	185 Hp	1.3	distillate fuel, 0.5%	1975
Screen Engine	129 kW	1.2	distillate fuel, 0.5%	2003

MWP operates an aqueous-based parts washer. It does not meet the definition of solvent cleaning machine, and there are no applicable requirements in 06-096 CMR 130. Therefore, it is considered an insignificant activity and mentioned for completeness purposes only.

D. Definitions

Distillate Fuel means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials 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.

E. Application Classification

The application for MWP does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping. However, this application does seek to address a Best Available Control Technology (BACT) analysis performed per New Source Review.

The modification of a major source is considered a major modification based on whether or not expected emissions increases exceed the "Significant Emission Increase Levels" as given in *Definitions Regulation*, 06-096 Code of Maine Rules (CMR) 100 (as amended).

The emission increases are determined by subtracting the baseline actual emissions of the 24 months preceding the modification (or representative 24 months) from the proposed actual emissions or from the maximum proposed licensed allowed limits. The results of this test are as follows:

Pollutant	Baseline Emissions (ton/year)	Maximum Licensed Emissions (ton/year)	Net Emissions Increase (ton/year)	Significance Emissions Increase Levels (ton/year)
PM	0	0.2	0.2	25
PM_{10}	0	0.2	0.2	15
$PM_{2.5}$	0	0.2	0.2	10
SO_2	0	0.7	0.7	40
NO_x	0	6.3	6.3	40
CO	0	1.4	1.4	100
VOC	0	0.5	0.5	40

Note: The above numbers are for the Fire Pump Engine and Screen Engine only. None of the other equipment at the facility is affected by this amendment.

Therefore, this amendment is determined to be a minor modification under *Minor and Major Source Air Emission License Regulations* 06-096 CMR 115 (as amended) since the changes being made are not addressed or prohibited in the Part 70 air emission license. An application to incorporate the requirements of this amendment into the Part 70 air emission license shall be submitted no later than 12 months from commencement of the requested operation.

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 CMR 100 (as amended). 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 CMR 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Fire Pump Engine

MWP operates a fire pump with a Cummins Model V-504-F2 engine intended to be used in emergency situations. The Fire Pump Engine is rated at 185 Hp (1.3 MMBtu/hr) and fires distillate fuel. The Fire Pump Engine was manufactured in 1975.

1. BACT Findings

The BACT emission limits for the Fire Pump Engine are based on the following:

PM/PM_{10}	- 0.12 lb/MMBtu from 06-096 CMR 103
SO_2	- combustion of distillate fuel with a maximum sulfur content not to exceed 0.5% sulfur by weight
NO_x	- 4.41 lb/MMBtu from AP-42 dated 10/96
CO	- 0.95 lb/MMBtu from AP-42 dated 10/96
VOC	- 0.35 lb/MMBtu from AP-42 dated 10/96
Opacity	- 06-096 CMR 101

The BACT emission limits for the Fire Pump Engine are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Fire Pump Engine	0.16	0.16	0.67	5.73	1.24	0.46

Visible emissions from the Fire Pump Engine shall not exceed 20% opacity on a 6-minute block average, except for no more than two (2) six (6) minute block averages in a 3-hour period.

Prior to July 1, 2016, or by the date otherwise stated in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired in the Fire Pump Engine shall have a maximum sulfur content of 0.5% by weight. Per 38 M.R.S.A. §603-A(2)(A)(3), beginning July 1, 2016, or on the date specified in the statute, distillate fuel fired shall have a maximum sulfur content of 0.005% by weight (50 ppm), and beginning January 1, 2018, or on the date specified in the statute, distillate fuel fired shall have a maximum sulfur content of 0.0015% by weight (15 ppm). The specific dates and requirements contained in this paragraph reflect the current dates and requirements in the statute as of the effective date of this license; however, if the statute is revised, the facility

shall comply with the revised dates and requirements upon promulgation of the statute revision.

2. 40 CFR Part 63, Subpart ZZZZ

The federal regulation 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines* is applicable to the Fire Pump Engine. 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 this unit from the federal requirements.

a. Emergency Definition:

Emergency stationary RICE means any stationary reciprocating internal combustion engine that meets all of the following criteria:

(1) The stationary RICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc. There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) Paragraph (1) above notwithstanding, the emergency stationary RICE may be operated for any combination of the purposes specified below for a maximum of 100 hours per calendar year:

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 beyond 100 hours per calendar year.

The Fire Pump Engine shall be limited to the usage outlined in §63.6640(f) and therefore may be classified as an existing emergency stationary RICE as defined in 40 CFR Part 63, Subpart ZZZZ. Failure to comply with all of the requirements listed in §63.6640(f) may cause this engine to not be considered emergency engines and therefore subject to all the requirements for non-emergency engines.

b. 40 CFR Part 63, Subpart ZZZZ Requirements:

(1) Operation and Maintenance Requirements

	Operating Limitations (40 CFR §63.6603(a) and Table 2(d)) [*or (40 CFR §63.6602 and Table 2(c)) if major HAP source*
Compression ignition (distillate fuel) units:	- Change oil and filter every 500 hours of operation or annually, whichever comes first; - Inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and - Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The Fire Pump Engine shall be operated and maintained according to the manufacturer's emission-related written instructions or the facility shall develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the Fire Pump Engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]

(2) Optional Oil Analysis Program

MWP 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, MWP 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 CFR§63.6625(i)]

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on the Fire Pump Engine. [40 CFR §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 CFR §63.6625(h) & 40 CFR Part 63, Subpart ZZZZ Table 2d]

(5) Annual Time Limit for Maintenance and Testing
As an emergency engine, the Fire Pump Engine 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. [40 CFR §63.6640(f)]

(6) Recordkeeping
MWP shall keep records that include maintenance conducted on the Fire Pump Engine and the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency. [40 CFR §63.6655(e) and (f)]

C. Screen Engine

MWP operates a portable Finger-Trummell Screen which is powered by a portable engine (Screen Engine). The Screen Engine is a Perkins YD50481 rated at 129 kW (1.2 MMBtu/hr) and fires distillate fuel. The Screen Engine was manufactured in 2003.

The fuel fired in the Screen Engine shall be limited to 20,000 gallons/year, based on a 12-month rolling total, of distillate fuel with a sulfur content not to exceed 0.5% by weight.

1. BACT Findings

The BACT emission limits for the Screen Engine were based on the following:

PM/PM_{10}	- 0.12 lb/MMBtu from 06-096 CMR 103
SO_2	- combustion of distillate fuel with a maximum sulfur content not to exceed 0.5% sulfur by weight
NO_x	- 4.41 lb/MMBtu from AP-42 dated 10/96
CO	- 0.95 lb/MMBtu from AP-42 dated 10/96
VOC	- 0.35 lb/MMBtu from AP-42 dated 10/96
Opacity	- 06-096 CMR 101

The BACT emission limits for the Screen Engine are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Screen Engine	0.15	0.15	0.62	5.34	1.15	0.42

Visible emissions from the Screen Engine shall not exceed 20% opacity on a 6-minute block average, except for no more than two (2) six (6) minute block averages in a 3-hour period.

Prior to July 1, 2016, or by the date otherwise stated in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired in the Screen Engine shall have a maximum sulfur content of 0.5% by weight. Per 38 M.R.S.A. §603-A(2)(A)(3), beginning July 1, 2016, or on the date specified in the statute, distillate fuel fired shall have a maximum sulfur content of 0.005% by weight (50 ppm), and beginning January 1, 2018, or on the date specified in the statute, distillate fuel fired shall have a maximum sulfur content of 0.0015% by weight (15 ppm). The specific dates and requirements contained in this paragraph reflect the current dates and requirements in the statute as of the effective date of this license; however, if the statute is revised, the facility shall comply with the revised dates and requirements upon promulgation of the statute revision.

2. New Source Performance Standards

The Screen Engine is considered a non-road engine, as opposed to a stationary engine, since the Screen Engine is portable and will be moved to various sites with the screen. Therefore, the Screen Engine is not subject to to New Source Performance Standards 40 CFR Part 60, Subpart IIII, *Standards of*

Performance for Stationary Compression Ignition Internal Combustion Engines.

3. National Emission Standards for Hazardous Air Pollutants

The Screen Engine is considered a non-road engine, as opposed to a stationary engine, since the Screen Engine is portable and will be moved to various sites with the screen. Therefore, the Screen Engine is not subject to 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. The definition in 40 CFR Part 1068.30 states that a non-road engine is an internal combustion engine that meets certain criteria, including: "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." 40 CFR Part 1068.30 further states that an engine is not a non-road engine if it remains or will remain at a location for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source. An engine located at a seasonal source (a stationary source that remains in a single location on a permanent basis (i.e., at least two years) and that operates at that single location approximately three months (or more) each year) is an engine that remains at a seasonal source during the full annual operating period of the seasonal source.

D. Incorporation into the Part 70 Air Emission License

The requirements in this 06-096 CMR 115 New Source Review amendment shall apply to the facility upon amendment issuance. Per *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (as amended), Section 1(C)(8), for a modification that has undergone NSR requirements or been processed through 06-096 CMR 115, the source must then apply for an amendment to the Part 70 license within one year of commencing the proposed operations as provided in 40 CFR Part 70.5.

E. Annual Emissions

1. MWP shall be restricted to the following annual emissions, based on a 12 month rolling total. The tons per year limits were calculated based on the following:

   - Operation of Furnace #1 and Pre-Dryer #1 at full capacity for 8,200 hr/year;
   - Operation of Dryer #1 at full capacity for 7,950 hr/year;
   - Operation of the Cyclone Baghouse for 7,950 hr/year;
   - Operation of the Fire Pump Engine for 100 hr/year; and
   - Firing 20,000 gal/year of fuel in the Screen Engine.

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**
Dryer #1	33.8	50.9	50.9	20.3	19.9	60.0	49.7
Cyclone Baghouse	2.0	2.0	2.0	–	–	–	–
Furnace #1 & Pre-Dryer #1	68.9	68.9	68.9	15.2	97.6	243.5	49.2
Fire Pump Engine	–	–	–	–	0.3	0.1	–
Screen Engine	0.2	0.2	0.2	0.7	6.0	1.3	0.5
Total TPY	**104.9**	**122.0**	**122.0**	**36.2**	**124.1**	**304.9**	**99.4**

2. Greenhouse Gases
   Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans,* 40 CFR Part 52, Subpart A, §52.21, *Prevention of Significant Deterioration of Air Quality* rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO_2e).

The quantity of CO_2e emissions from this facility is greater than 100,000 tons per year, based on the following:

- the facility's operational limits;
- worst case emission factors from the following sources: U.S. EPA's AP-42, the Intergovernmental Panel on Climate Change (IPCC), and 40 CFR Part 98, *Mandatory Greenhouse Gas Reporting*; and
- global warming potentials contained in 40 CFR Part 98.

As defined in 06-096 CMR 100, any source emitting 100,000 tons/year or more of CO_2e is a major source for GHG. This license includes applicable requirements addressing GHG emissions from this source, as appropriate.

III. AMBIENT AIR QUALITY ANALYSIS

MWP 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 amendment.

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-989-77-1-A pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the standard and special 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) Fire Pump Engine

A. The Fire Pump Engine shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 CMR 115, BACT]

B. Per the current dates and requirements of 38 M.R.S.A. §603-A(2)(A)(3), the facility shall comply with the following statements; however, if the statute is revised, the facility shall comply with the revised dates and requirements upon promulgation of the statute revision.

1. Prior to July 1, 2016, or the date specified in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired in the Fire Pump Engine shall have a maximum sulfur content of 0.5% by weight. [06-096 CMR 115, BPT]
2. Beginning July 1, 2016, or on the date specified in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired in the Fire Pump Engine shall have a maximum sulfur content of 0.005% by weight (50 ppm). [38 M.R.S.A. §603-A(2)(A)(3)]
3. Beginning January 1, 2018, or on the date specified in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired in the Fire Pump Engine shall have a maximum sulfur content of 0.0015% by weight (15 ppm). [38 M.R.S.A. §603-A(2)(A)(3)]

C. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Fire Pump Engine	0.16	0.16	0.67	5.73	1.24	0.46

D. Visible emissions from the Fire Pump Engine shall not exceed 20% opacity on a 6-minute block average, except for no more than two (2) six (6) minute block averages in a 3-hour period. [06-096 CMR 101]

E. The Fire Pump Engine shall meet the applicable requirements of 40 CFR Part 63, Subpart ZZZZ, including the following:

1. MWP shall meet the following operational limitations for the Fire Pump Engine:

   a. Change the oil and filter annually,
   b. Inspect the air cleaner annually and replace as necessary, and

c. Inspect the hoses and belts annually and replace as necessary.

Records shall be maintained documenting compliance with the operational limitations.

[40 CFR §63.6603(a) and Table 2(d) and 06-096 CMR 115]

2. Oil Analysis Program Option
MWP 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, MWP 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 CFR§63.6625(i)]

3. Non-Resettable Hour Meter
A non-resettable hour meter shall be installed and operated on the Fire Pump Engine. [40 CFR §63.6625(f)]

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

a. As an emergency engine the Fire Pump Engine 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. These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written logs) of all engine operating hours. [40 CFR §63.6640(f) and 06-096 CMR 115]
b. MWP 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 hours spent for emergency operation, including what classified the operation as emergency and how many hours spent for non-emergency. [40 CFR §63.6655(e) and (f)]

5. Operation and Maintenance
The Fire Pump Engine shall be operated and maintained according to the manufacturer's emission-related written instructions or MWP 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 CFR §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, after which time the non-startup emission limitations apply. [40 CFR §63.6625(h) & 40 CFR Part 63, Subpart ZZZZ Table 2d]

(2) **Screen Engine**

A. Total fuel use for the Screen Engine shall not exceed 20,000 gal/yr of distillate fuel. Compliance shall be demonstrated by fuel records showing the quantity and type of fuel delivered. Records of annual fuel use shall be kept on a monthly 12-month rolling total basis. [06-096 CMR 115, BACT]

B. Per the current dates and requirements of 38 M.R.S.A. §603-A(2)(A)(3), the facility shall comply with the following statements; however, if the statute is revised, the facility shall comply with the revised dates and requirements upon promulgation of the statute revision.
1. Prior to July 1, 2016, or the date specified in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired in the Screen Engine shall have a maximum sulfur content of 0.5% by weight. [06-096 CMR 115, BPT]
2. Beginning July 1, 2016, or on the date specified in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired in the Screen Engine shall have a maximum sulfur content of 0.005% by weight (50 ppm). [38 M.R.S.A. §603-A(2)(A)(3)]
3. Beginning January 1, 2018, or on the date specified in 38 M.R.S.A. §603-A(2)(A)(3), the distillate fuel fired in the Screen Engine shall have a maximum sulfur content of 0.0015% by weight (15 ppm). [38 M.R.S.A. §603-A(2)(A)(3)]

C. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Screen Engine	0.15	0.15	0.62	5.34	1.15	0.42

D. Visible emissions from the Screen Engine shall not exceed 20% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period. [06-096 CMR 101]

(3) MWP 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 1(C)(8)]

DONE AND DATED IN AUGUSTA, MAINE THIS 13 DAY OF August , 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Mara Allen Robert Cone for
PATRICIA W. AHO, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 7/21/15
Date of application acceptance: 7/21/15

Date filed with the Board of Environmental Protection:

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

Filed
AUG 14 2015
State of Maine
Board of Environmental Protection