



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

AVERY T. DAY
ACTING COMMISSIONER

**Elmet Technologies LLC
Androscoggin County
Lewiston, Maine
A-565-71-R-M (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Minor Revision**

FINDINGS OF FACT

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

I. REGISTRATION

A. Introduction

Elmet Technologies LLC (Elmet) was issued Air Emission License A-565-71-Q-R/M on July 15, 2015, permitting the operation of emission sources associated with their manufacturing facility.

Elmet has requested a minor revision to their license in order to correct the frequency of the tune-up requirement for the Bryan Boiler #2 in the current air emission license.

The equipment addressed in this license is located at 1560 Lisbon Street Lewiston, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Equipment	Maximum Capacity (MMBtu/hr)	Fuel Type	Date of Manufacture	Stack #
Bryan Boiler #2	5.0	Natural gas, propane, distillate fuel	2005	3

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: (207) 760-3143

C. Application Classification

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

II. **BEST PRACTICAL TREATMENT (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.

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. Description of Revision:

Elmet's Air Emission License renewal, recently issued July 15, 2015, had inadvertently stated that Bryan Boiler #2 (rated at 5.0 MMBtu/hr) was required per 40 CFR Part 63 Subpart JJJJJ (Boiler MACT) to receive a tune-up every 2 years. The requirement for biennial tune-ups apply to boilers having a capacity of greater than 5.0 MMBtu/hr and therefore also states that units with heat input capacities of equal to or less than 5.0 MMBtu/hr shall conduct tune-ups of the boiler every 5 years. Bryan Boiler #2 at its rated size of 5.0 MMBtu/hr is only required to have a tune-up every 5 years instead. This minor revision will update/correct this requirement in Air Emissions License A-565-71-Q-R/M.

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-565-71-R-M subject to the conditions found in Air Emission License A-565-71-Q-R/M and the following conditions.

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

The following shall replace Condition (16) E of Air Emissions License A-565-71-Q-R/M:

(16) E. Boiler MACT (40 CFR Part 63, Subpart JJJJJ) Requirements for Bryan Boiler #2 and Burnham Boiler. [incorporated under 06-096 CMR 115, BPT]

1. An Initial Notification submittal to EPA was due no later than January 20, 2014. [40 CFR Part 63.11225(a)(2)]
2. The facility shall implement a boiler tune-up program. [40 CFR Part 63.11223]

(a) Each tune-up shall be conducted at a frequency specified by the rule and based on the size, age, and operations of the boiler. See chart below:

Boiler Category	Tune-Up Frequency
New or Existing Oil, Biomass and Coal fired boilers that are not designated as "Boilers with less frequent tune up requirements" listed below	Every 2 years
<i>New and Existing Oil, Biomass, and Coal fired Boilers with less frequent tune up requirements</i> With a heat input capacity of ≤ 5 MMBtu/hr	Every 5 years
Boiler with oxygen trim system which maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune up	Every 5 years

[40 CFR Part 63.11223(a) and Table 2]

- (b) The boiler tune-up program, conducted to demonstrate continuous compliance, shall be performed as specified below:
- (1) As applicable, inspect the burner, and clean or replace any component of the burner as necessary. Delay of the burner inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than or equal to 5

- MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(1)]
- (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications. [40 CFR Part 63.11223(b)(2)]
 - (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. Delay of the inspection until the next scheduled shutdown is permitted; not to exceed 36 months from the previous inspection for boilers greater than 5 MMBtu/hr or 72 months from the previous inspection for oil fired boilers less than or equal to 5 MMBtu/hr, boilers with oxygen trim systems, seasonal boilers, and limited use boilers. [40 CFR Part 63.11223(b)(3)]
 - (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 CFR Part 63.11223(b)(4)]
 - (5) Measure the concentration in the effluent stream of CO in parts per million by volume (ppmv), and oxygen in volume percent, before and after adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR Part 63.11223(b)(5)]
 - (6) If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up. [40 CFR Part 63.11223(b)(7)]
- (c) Tune-Up Report: A tune-up report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the following information:
- (1) The concentration of CO in the effluent stream (ppmv) and oxygen (volume percent) measured at high fire or typical operating load both **before** and **after** the boiler tune-up;
 - (2) A description of any corrective actions taken as part of the tune-up of the boiler; and
 - (3) The types and amounts of fuels used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
[40 CFR §63.11223(b)(6)]
- (d) After conducting the initial boiler tune-up, a Notification of Compliance Status should have been submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]

3. Compliance Report

A compliance report shall be prepared by March 1st every five years for Bryan Boiler #2 and the Johnson-Burnham Boiler which covers the previous calendar years. The report shall be maintained by the source and submitted to the Department and to the EPA upon request. The report must include the items contained in §63.11225(b)(1) and (2), including the following: [40 CFR §63.11225(b)]

- (a) Company name and address;
- (b) A statement of whether the source has complied with all the relevant requirements of this Subpart;
- (c) A statement certifying truth, accuracy, and completeness of the notification and signed by a responsible official and containing the official's name, title, phone number, email address, and signature;
- (d) The following certifications, as applicable:
 - (1) "This facility complies with the requirements in 40 CFR §63.11223 to conduct tune-ups of each boiler in accordance with the frequency specified in this Subpart."
 - (2) "No secondary materials that are solid waste were combusted in any affected unit."
 - (3) "This facility complies with the requirement in 40 CFR §§63.11214(d) to conduct a tune-up of each applicable boiler according to 40 CFR §63.11223(b)."

4. Records shall be maintained consistent with the requirements of 40 CFR Part 63, Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]:

- (a) Copies of notifications and reports with supporting compliance documentation;
- (b) Identification of each boiler, the date of tune-up, procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned;
- (c) Records of the occurrence and duration of each malfunction of each applicable boiler; and
- (d) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

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Records shall be in a form suitable and readily available for expeditious review. EPA requires submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. [63.1125(a)(4)(vi)]

DONE AND DATED IN AUGUSTA, MAINE THIS 30 DAY OF October, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *Maria Allen Robert Cone for*
AVERY T. DAY, ACTING COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-565-71-Q-R/M.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: September 29, 2015

Date of application acceptance: October 2, 2015

Date filed with the Board of Environmental Protection:

This Order prepared by Edwin Cousins, Bureau of Air Quality.

