



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

DEPARTMENT ORDER

BlueTriton Brands, Inc.
Androscoggin County
Poland, Maine
A-701-71-J-R

Departmental
Findings of Fact and Order
Air Emission License
Renewal

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

BlueTriton Brands, Inc. (BlueTriton) has applied to renew its Air Emission License for the operation of emission sources associated with its water processing and bottling facility.

The equipment addressed in this license is located at 109 Poland Spring Drive in Poland, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Max. Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type	Date of Install.	Stack #
Boiler #4	16.7	119.5 gal/hr	distillate fuel	1998	2
		16,300 scfh	natural gas		
Boiler #5	9.0	64.3 gal/hr	distillate fuel	2000	2
		8,800 scfh	natural gas		
Boiler #6	9.0	64.3 gal/hr	distillate fuel	2000	2
		8,800 scfh	natural gas		

BlueTriton also has other small boilers 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 level at or above which would require their inclusion in the license; therefore, these small boilers are not addressed further in this license.

Stationary Engines

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (HP)	Firing Rate (gal/hr)	Fuel Type	Date of Install.
Generator #1	2.44	382	17.8	distillate fuel	1998

BlueTriton 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, BlueTriton 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.

Process Equipment

Equipment	Pollutant Emitted
Inkjet Printers	VOC

BlueTriton also operates label adhesive and plastic bottle molding processes that emit very low amounts of VOC. These processes have been determined to be insignificant activities pursuant to 06-096 C.M.R. ch. 115, Appendix B, § B.1.

BlueTriton previously operated a solvent-based parts washer. Use of this equipment has been discontinued.

C. Definitions

Distillate Fuel means the following:

- Fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) 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.

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.

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.

The application for BlueTriton does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of currently licensed emission units only 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

The facility is licensed as follows:

- As a natural minor source of criteria pollutants, because no license restrictions are necessary to keep facility emissions below major source thresholds for criteria pollutants; and
- As an area source of hazardous air pollutants (HAP), because the licensed emissions are below the major source thresholds for HAP.

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. Process Description

BlueTriton produces bottled water. The bottles are filled with filtered water, capped, and labeled. Different production lines are operated throughout the facility depending on the size and kind of bottle being filled (ie. plastic bottles, plastic cartons, and glass bottles) as well as lines for flavored, carbonated water.

To make the various sized plastic bottles, BlueTriton uses small plastic pre-forms. The pre-forms are placed in molds, heated slightly, and then formed into the bottle shape with high pressure air. Glass bottles are made elsewhere and are shipped in to be filled.

Most of the labels are affixed to the bottle using hot melt adhesive, although some of the labels for the larger plastic cartons are self-adhesive. Each bottle and box of bottles is identified using inks to distinguish batches, dates, times, etc.

The bottles are placed into cardboard cases and are heat-wrapped with film. The cases are conveyed to pallet wrapping units where the cases are then arranged on pallets and the pallet load is heat-wrapped with film. After packaging, the bottled water is temporarily stored until it is shipped for distribution.

The three boilers are used for both general heating purposes and in the process, including condensation removal and in the clean-in-place procedures. In the carbonated water line, the bottles are filled cold and are then sent through a heater to remove the condensate on the outside of the bottle so that the labels will stick to the plastic. Also, steam is used in portions of the heat-wrap process and bottle making process.

C. Boilers #4, #5, and #6

BlueTriton operates three boilers for facility heating (Boilers #4, #5, and #6). Boiler #4 is a Cleaver Brooks fire tube boiler installed in 1998 rated at 16.7 MMBtu/hr and fires either natural gas or distillate fuel. Boilers #5 and #6 are each Cleaver Brooks flexible watertube boilers (model FLX-900) rated at 9.0 MMBtu/hr firing either natural gas or distillate fuel. Boilers #5 and #6 are primarily used as back-up to Boiler #4. All boilers exhaust through a single combined stack (Stack #2).

Boilers #4, #5, and #6 are licensed to fire distillate fuel. With limited exceptions, no person shall import, distribute, or offer for sale any distillate fuel with a sulfur content greater than 0.0015% by weight (15 ppm) pursuant to 38 M.R.S. § 603-A(2)(A)(3). Therefore, the distillate fuel purchased or otherwise obtained for use in the boilers shall not exceed 0.0015% by weight (15 ppm).

1. BPT Findings

The BPT emission limits for Boiler #4 were based on the following:

Distillate Fuel

- PM/PM₁₀/PM_{2.5} – 0.06 lb/MMBtu, 06-096 C.M.R. ch. 115, BPT, based on a BACT analysis in A-701-71-B-A (1/7/1998)
- SO₂ – based on firing distillate fuel with a maximum sulfur content of 0.0015% by weight
- NO_x – 0.25 lb/MMBtu, 06-096 C.M.R. ch. 115, BPT, based on a BACT analysis in A-701-71-B-A (1/7/1998)
- CO – 0.072 lb/MMBtu, 06-096 C.M.R. ch. 115, BPT, based on a BACT analysis in A-701-71-B-A (1/7/1998)
- VOC – 0.024 lb/MMBtu, 06-096 C.M.R. ch. 115, BPT, based on a BACT analysis in A-701-71-B-A (1/7/1998)
- Visible Emissions – 06-096 C.M.R. ch. 101

Natural Gas

- PM/PM₁₀/PM_{2.5} – 0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT
- SO₂ – 0.6 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
- NO_x – 100 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
- CO – 84 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
- VOC – 5.5 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
- Visible Emissions – 06-096 C.M.R. ch. 101

The BPT emission limits for Boilers #5 and #6 were based on the following:

Distillate Fuel

- PM/PM₁₀/PM_{2.5} – 0.03 lb/MMBtu, 06-096 C.M.R. ch. 115, BPT, based on a BACT analysis in A-701-71-C-A (11/29/2000)
- SO₂ – based on firing distillate fuel with a maximum sulfur content of 0.0015% by weight
- NO_x – 0.187 lb/MMBtu, 06-096 C.M.R. ch. 115, BPT, based on a BACT analysis in A-701-71-C-A (11/29/2000)

- CO – 0.040 lb/MMBtu, 06-096 C.M.R. ch. 115, BPT, based on a BACT analysis in A-701-71-C-A (11/29/2000)
- VOC – 0.025 lb/MMBtu, 06-096 C.M.R. ch. 115, BPT, based on a BACT analysis in A-701-71-C-A (11/29/2000)
- Visible Emissions – 06-096 C.M.R. ch. 101

Natural Gas

- PM/PM₁₀/PM_{2.5} – 0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT
- SO₂ – 0.6 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
- NO_x – 100 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
- CO – 84 lb/MMscf based on AP-42 Table 1.4-1 dated 7/98
- VOC – 5.5 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98
- Visible Emissions – 06-096 C.M.R. ch. 101

The BPT emission limits for the boilers are the following:

Unit	Pollutant	lb/MMBtu
Boiler #4 <i>distillate fuel</i>	PM	0.06
Boiler #4 <i>natural gas</i>	PM	0.05
Boiler #5 <i>distillate fuel</i>	PM	0.03
Boiler #5 <i>natural gas</i>	PM	0.05
Boiler #6 <i>distillate fuel</i>	PM	0.03
Boiler #6 <i>natural gas</i>	PM	0.05

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)
Boiler #4 <i>distillate fuel</i>	1.00	1.00	1.00	0.03	4.18	1.20	0.40
Boiler #4 <i>natural gas</i>	0.84	0.84	0.84	0.01	1.62	1.36	0.09
Boiler #5 <i>distillate fuel</i>	0.27	0.27	0.27	0.01	1.68	0.36	0.23
Boiler #5 <i>natural gas</i>	0.45	0.45	0.45	0.01	0.87	0.73	0.05
Boiler #6 <i>distillate fuel</i>	0.27	0.27	0.27	0.01	1.68	0.36	0.23
Boiler #6 <i>natural gas</i>	0.45	0.45	0.45	0.01	0.87	0.73	0.05

BlueTriton shall be limited to 750,000 gallons per year of distillate fuel, based on a calendar year total. This limit is intended to keep the facility below the reporting thresholds of *Emission Statements*, 06-096 C.M.R. ch. 137. Use of natural gas is unlimited.

2. Visible Emissions

Stack #2 is subject to the following visible emission standard pursuant to 06-096 C.M.R. ch. 101, § 4(A)(6)(a):

During periods of time when only natural gas is being fired in the boilers exhausting to Stack #2, visible emissions shall not exceed 10% opacity on a six-minute block average basis.

During periods of time when distillate fuel is being fired in any boiler exhausting to Stack #2, visible emissions shall not exceed 20% opacity on a six-minute block average basis.

3. Periodic Monitoring

Periodic monitoring for the boilers shall include recordkeeping to document distillate fuel use both on a monthly and calendar year total basis. Documentation shall include the sulfur content of the fuel.

4. New Source Performance Standards (NSPS): 40 C.F.R. Part 60, Subpart Dc

Due to their size, Boilers #5 and #6 are not subject to *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* 40 C.F.R. Part 60, Subpart Dc for units greater than 10 MMBtu/hr manufactured after June 9, 1989. [40 C.F.R. § 60.40c]

Boiler #4 is subject to 40 C.F.R. Part 60, Subpart Dc. BlueTriton shall comply with all requirements of 40 C.F.R. Part 60, Subpart Dc applicable to Boiler #4 including, but not limited to, the following:

a. Standards

The fuel fired in Boiler #4 shall not exceed 0.5% sulfur by weight. [40 C.F.R. § 60.42c(d)] This fuel sulfur content limit shall be streamlined to the lower limit of 0.0015% sulfur by weight required by State statute.

b. Reporting and Recordkeeping

- (1) BlueTriton shall maintain records of the amounts of each fuel combusted during each calendar month. [40 C.F.R. § 60.48c(g)]
- (2) BlueTriton shall submit semi-annual reports to EPA and to the Department. [40 C.F.R. § 60.48c(d)] These reports shall include the following:
 - (i) Calendar dates covered in the reporting period; [40 C.F.R. § 60.48c(e)(1)] and
 - (ii) Records of fuel supplier certifications. [40 C.F.R. § 60.48c(e)(11)]
- (3) The semi-annual reports are due within 30 days of the end of each six-month period. [40 C.F.R. § 60.48c(j)]
- (4) The following address for EPA shall be used for any reports or notifications required to be copied to them:

U.S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100 (OES04-2)
Boston, MA 02109-3912
Attn: Air Compliance Clerk

- (5) BlueTriton shall maintain records required by Subpart Dc for a period of two years following the date of the record. [40 C.F.R. § 60.48c(i)] Note: Standard Condition (8) of this license requires all records be retained for six years; therefore, the two-year record retention requirement of Subpart Dc shall be streamlined to the more stringent six-year requirement.

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

Boilers #4, #5, and #6 are subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*, 40 C.F.R. Part 63, Subpart JJJJJ. These units are considered existing oil boilers. [40 C.F.R. §§ 63.11193 and 63.11195]

Applicable federal 40 C.F.R. Part 63, Subpart JJJJJ requirements include the following. Additional rule information can be found on the following website: <https://www.epa.gov/stationary-sources-air-pollution/compliance-industrial-commercial-and-institutional-area-source>.

a. Compliance Dates, Notifications, and Work Practice Requirements

(1) Boiler Tune-Up Program

(i) A boiler tune-up program shall be implemented. [40 C.F.R. § 63.11223]

(ii) Tune-ups shall be conducted every two years. [40 C.F.R. § 63.11223(a) and Table 2]

(iii) 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. [40 C.F.R. § 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 C.F.R. § 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. [40 C.F.R. § 63.11223(b)(3)]
4. Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 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 C.F.R. § 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 C.F.R. § 63.11223(b)(7)]

(iv) Tune-Up Report: A tune-up report shall be maintained onsite and, submitted to the Department and/or EPA upon request. 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 C.F.R. § 63.11223(b)(6)]

(2) Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 63.11225(b)]

- (i) Company name and address;
- (ii) A statement of whether the source has complied with all the relevant requirements of this Subpart;
- (iii) 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;
- (iv) The following certifications, as applicable:
 1. "This facility complies with the requirements in 40 C.F.R. § 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 §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

b. Recordkeeping

- (1) Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJ including the following [40 C.F.R. § 63.11225(c)]:
 - (i) Copies of notifications and reports with supporting compliance documentation;
 - (ii) 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;
 - (iii) Records of the occurrence and duration of each malfunction of each applicable boiler; and
 - (iv) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.

(2) Records shall be in a form suitable and readily available for expeditious review. Each record must be kept for 5 years following the date of each recorded action. Each record must be kept on-site or be accessible from a central location by computer or other means that instantly provides access at the site for at least 2 years after the date of each recorded action. The records may be maintained off-site for the remaining 3 years. [40 C.F.R. § 63.11225(d)] Note: Standard Condition (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJ shall be streamlined to the more stringent six-year requirement.

D. Generator #1

BlueTriton operates one emergency generator (Generator #1). It is a generator set consisting of an engine and an electrical generator. Generator #1 has an engine rated at 2.44 MMBtu/hr and fires distillate fuel. It was manufactured in 1998.

1. BPT Findings

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

- PM/PM₁₀/PM_{2.5} – 0.31 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96
- SO₂ – Combustion of distillate fuel with a maximum sulfur content not to exceed 15 ppm (0.0015% sulfur by weight)
- NO_x – 4.41 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96
- CO – 0.95 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96
- VOC – 0.36 lb/MMBtu from AP-42 Table 3.3-1 dated 10/96
- Visible Emissions – 06-096 C.M.R. ch. 101

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

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	0.76	0.76	0.76	neg	10.76	2.32	0.88

Visible emissions from Generator #1 shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time BlueTriton shall either meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard.

- a. The duration of the startup shall not exceed 30 minutes per event;
- b. Visible emissions shall not exceed 50% opacity on a six-minute block average basis; and
- c. BlueTriton shall keep records of the date, time, and duration of each startup.

Use of the work practice standards and alternative visible emissions standard in lieu of the normal operating standard is limited to no more than once per day.

Note: This does not limit the engine to one startup per day. It only limits the use of the alternative emission standard to once per day.

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 its date of manufacture, Generator #1 is not subject to the New Source Performance Standards (NSPS) *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE)*, 40 C.F.R. Part 60, Subpart III since the unit was manufactured prior to April 1, 2006. [40 C.F.R. § 60.4200]

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 is applicable Generator #1. 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. [40 C.F.R. § 63.6585]

A summary of the currently applicable federal 40 C.F.R. Part 63, Subpart ZZZZ requirements is listed below.

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 63, 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 40 C.F.R. Part 63, 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 40 C.F.R. Part 63, 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
Compression ignition (distillate fuel) units: <i>Generator #1</i>	<ul style="list-style-type: none">- Change oil and filter every 500 hours of operation or annually, whichever comes first;- Inspect the air cleaner every 1,000 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 engine shall be operated and maintained according to the manufacturer's emission-related written instructions, or BlueTriton 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

BlueTriton 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, BlueTriton 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. [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

BlueTriton 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)]

E. VOC Emissions

Possible VOC emission sources from the processes at BlueTriton include the label adhesive, the plastic bottle molding, and the ink jet operations used to identify the bottles and cartons.

BlueTriton has determined that the adhesive used to stick the labels on bottles does emit VOC if the heated product is exposed to the atmosphere. Results show that 2% of the product is emitted if it is exposed to the atmosphere for one hour (using 40 C.F.R. Part 60, Appendix A, Method 24). In actuality, the hot melt is in liquid form and is exposed to the atmosphere for only a brief amount of time as it is rolled on the containers. Based on the information from the manufacturer, the analytical results, and the use of the hot melt, VOC emissions from this process are considered insignificant.

The plastic tubes are heated as part of the high pressure molding process and a small amount of VOC emissions are released. However, emissions from bottle production are considered insignificant.

The ink used in inkjet printers to identify boxes, cartons, and bottles is water-based but contains some VOC. BlueTriton shall keep records of the amount of ink used, the ink VOC content by weight, and the monthly VOC emissions. BPT for VOC emissions from the inkjet printers shall be a limit of 5.0 tpy of VOC on a calendar year basis.

F. General Process Emissions

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

G. Fugitive Emissions

BlueTriton 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.

BlueTriton 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.

H. 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 assumptions:

- Firing 750,000 gal/year of distillate fuel in Boiler #4 (i.e., the highest emitting boiler) with the remaining available heat input provided by natural gas;
- Unlimited firing of natural gas in the boilers;
- Operating Generator #1 for 100 hrs/yr; and
- A VOC limit for the inkjet printers of 5.0 tpy.

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
Oil Firing	3.2	3.2	3.2	0.1	13.1	3.8	1.3
Boiler #4 (remaining capacity firing natural gas)	1.0	1.0	1.0	–	2.0	1.7	0.1
Boiler #5	2.0	2.0	2.0	–	3.8	3.2	0.2
Boiler #6	2.0	2.0	2.0	–	3.8	3.2	0.2
Generator #1	–	–	–	–	0.5	0.1	–
Inkjet Printers	–	–	–	–	–	–	5.0
Total TPY	8.2	8.2	8.2	0.1	23.2	12.0	6.8

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source is determined by the Department on a case-by case basis. In accordance with 06-096 C.M.R. ch. 115, an ambient air quality impact analysis is not required for a minor source if the total licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM ₁₀	25
PM _{2.5}	15
SO ₂	50
NO _x	50
CO	250

The total licensed annual emissions for the facility are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

This determination is based on information provided by the applicant regarding licensed emission units. If the Department determines that any parameter (e.g., stack size, configuration, flow rate, emission rates, nearby structures, etc.) deviates from what was included in the application, the Department may require BlueTriton to submit additional information and may require an ambient air quality impact analysis at that time.

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-701-71-J-R 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.

STANDARD CONDITIONS

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

SPECIFIC CONDITIONS

(17) **Boilers #4, #5, and #6**

A. Fuel

1. Total distillate fuel use for Boilers #4, #5, and #6 (combined) shall not exceed 750,000 gal/yr based on a calendar year total basis. [06-096 C.M.R. ch. 115, BPT]

2. The facility shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [06-096 C.M.R. ch. 115, BPT]
3. Compliance shall be demonstrated by fuel records showing the quantity, type, and the percent sulfur of the fuel delivered. Records of annual fuel use shall be kept on a monthly and calendar year total basis. Fuel sulfur content compliance shall be demonstrated by fuel supplier certification. [06-096 C.M.R. ch. 115, BPT and 40 C.F.R. Part 60, Subpart Dc]

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

Emission Unit	Pollutant	lb/MMBtu
Boiler #4 <i>distillate fuel</i>	PM	0.06
Boiler #4 <i>natural gas</i>	PM	0.05
Boiler #5 <i>distillate fuel</i>	PM	0.03
Boiler #5 <i>natural gas</i>	PM	0.05
Boiler #6 <i>distillate fuel</i>	PM	0.03
Boiler #6 <i>natural gas</i>	PM	0.05

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

Emission 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)
Boiler #4 <i>distillate fuel</i>	1.00	1.00	1.00	0.03	4.18	1.20	0.40
Boiler #4 <i>natural gas</i>	0.84	0.84	0.84	0.01	1.62	1.36	0.09
Boiler #5 <i>distillate fuel</i>	0.27	0.27	0.27	0.01	1.68	0.36	0.23
Boiler #5 <i>natural gas</i>	0.45	0.45	0.45	0.01	0.87	0.73	0.05
Boiler #6 <i>distillate fuel</i>	0.27	0.27	0.27	0.01	1.68	0.36	0.23
Boiler #6 <i>natural gas</i>	0.45	0.45	0.45	0.01	0.87	0.73	0.05

D. Visible Emissions

1. During periods of time when only natural gas is being fired in the boilers, visible emissions from Stack #2 shall not exceed 10% opacity on a six-minute block average basis.
2. During periods of time when distillate fuel is being fired in any of the boilers, visible emissions from Stack #2 shall not exceed 20% opacity on a six-minute block average basis.

[06-096 C.M.R. ch. 101, § 4(A)(6)(a)]

E. BlueTriton shall comply with all requirements of 40 C.F.R. Part 60, Subpart Dc applicable to Boiler #4 including, but not limited to, the following:

1. BlueTriton shall maintain records of the amounts of each fuel combusted during each calendar month. [40 C.F.R. § 60.48c(g)]
2. BlueTriton shall submit semi-annual reports to EPA and to the Department. [40 C.F.R. § 60.48c(d)] These reports shall include the following:
 - (1) Calendar dates covered in the reporting period; [40 C.F.R. § 60.48c(e)(1)]
and
 - (2) Records of fuel supplier certifications. [40 C.F.R. § 60.48c(e)(11)]
3. The semi-annual reports are due within 30 days of the end of each six-month period. [40 C.F.R. § 60.48c(j)]

F. BlueTriton shall comply with all requirements of 40 C.F.R. Part 63, Subpart JJJJJ applicable to Boilers #4, #5, and #6 including, but not limited to, the following: [incorporated under 06-096 C.M.R. ch. 115, BPT]

1. The facility shall implement a boiler tune-up program. [40 C.F.R. § 63.11223]
 - a. Tune-ups shall be conducted every two years.[40 C.F.R. § 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. [40 C.F.R. § 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 C.F.R. § 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. [40 C.F.R. § 63.11223(b)(3)]
 - (4) Optimize total emissions of CO, consistent with manufacturer's specifications. [40 C.F.R. § 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 C.F.R. § 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 C.F.R. § 63.11223(b)(7)]
- c. Tune-Up Report: A tune-up report shall be maintained onsite and submitted to the Department and EPA upon request. 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 C.F.R. § 63.11223(b)(6)]

2. Compliance Report

A compliance report shall be prepared by March 1st biennially which covers the previous two calendar years. The report shall be maintained by the source and submitted to the Department and/or to the EPA upon request. The report must include the items contained in §§ 63.11225(b)(1) and (2), including the following: [40 C.F.R. § 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 C.F.R. § 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 §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."
3. Recordkeeping
- a. Records shall be maintained consistent with the requirements of 40 C.F.R. Part 63, Subpart JJJJJ including the following [40 C.F.R. § 63.11225(c)]:
 - (1) Copies of notifications and reports with supporting compliance documentation;
 - (2) 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;
 - (3) Records of the occurrence and duration of each malfunction of each applicable boiler; and
 - (4) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler.
 - b. Records shall be in a form suitable and readily available for expeditious review. Each record must be kept for 5 years following the date of each recorded action. Each record must be kept on-site or be accessible from a central location by computer or other means that instantly provides access at the site for at least 2 years after the date of each recorded action. The records may be maintained off-site for the remaining 3 years. [40 C.F.R. § 63.11225(d)] Note: Standard Condition (8) of this license requires all records be retained for six years; therefore, the five-year record retention requirement of Subpart JJJJJ shall be streamlined to the more stringent six-year requirement.

(18) **Generator #1**

- A. The fuel sulfur content for Generator #1 shall be limited to 0.0015% sulfur by weight. Compliance shall be demonstrated by fuel delivery receipts from the supplier, fuel supplier certification, certificate of analysis, or testing of the fuel in the tank on-site. [06-096 C.M.R. ch. 115, BPT]
- B. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BPT]:

Unit	PM (lb/hr)	PM₁₀ (lb/hr)	PM_{2.5} (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #1	0.76	0.76	0.76	neg	10.76	2.32	0.88

C. Visible Emissions

Visible emissions from Generator #1 shall not exceed 20% opacity on a six-minute block average basis except for periods of startup during which time BlueTriton shall either meet the normal operating visible emissions standard or the following work practice standards and alternative visible emissions standard.

1. The duration of the startup shall not exceed 30 minutes per event;
2. Visible emissions shall not exceed 50% opacity on a six-minute block average basis; and
3. BlueTriton shall keep records of the date, time, and duration of each startup.

Use of the work practice standards and alternative visible emissions standard in lieu of the normal operating standard is limited to no more than once per day.

Note: This does not limit the engine to one startup per day. It only limits the use of the alternative emission standard to once per day.

[06-096 C.M.R. ch. 101, § 4(A)(4)]

- 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. chs. 115, BPT]
1. BlueTriton shall meet the following operational limitations for Generator #1:
 - a. Change the oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and

- b. Inspect the hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Records shall be maintained documenting compliance with the operational limitations.

[40 C.F.R. § 63.6603(a) and Table 2(d)]

2. Oil Analysis Program Option

BlueTriton 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, BlueTriton 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-Resetable Hour Meter

A non-resettable hour meter shall be installed and operated on the engine. [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)]

- b. BlueTriton 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(e) and (f)]

5. Operation and Maintenance

The engine shall be operated and maintained according to the manufacturer's emission-related written instructions, or BlueTriton 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)]

BlueTriton 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. [40 C.F.R. § 63.6625(h) & 40 C.F.R. Part 63, Subpart ZZZZ Table 2d]

(19) **Process Equipment**

- A. VOC emissions from the inkjet printers shall not exceed 5.0 tons/year, based on a calendar year total basis. [06-096 C.M.R. ch. 115, BPT]
- B. BlueTriton shall keep records of the amount of ink used, the ink VOC content by weight, and the monthly VOC emissions. [06-096 C.M.R. ch. 115, BPT]

(20) **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)]

(21) **Fugitive Emissions**

- A. BlueTriton 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. BlueTriton 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)]

- (22) 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, BlueTriton may be required to submit additional information. Upon written request from the Department, BlueTriton 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 16th DAY OF APRIL, 2024.

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: 8/4/2023

Date of application acceptance: 8/4/2023

Date filed with the Board of Environmental Protection:

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

FILED
APR 16, 2024
State of Maine
Board of Environmental Protection