



DEPARTMENT ORDER

**Savage Services Corporation  
Androscoggin County  
Auburn, Maine  
A-702-71-K-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

Savage Services Corporation (Savage) has applied to renew their Air Emission License for the operation of emission sources associated with their bulk material handling facility.

The equipment addressed in this license is located at 123 Rodman Rd, Auburn, Maine.

B. Emissions Equipment

The following equipment is addressed in this air emission license:

**Boilers**

<b>Equipment</b>	<b>Location</b>	<b>Max. Capacity (MMBtu/hr)</b>	<b>Maximum Firing Rate (scf/hr)</b>	<b>Fuel Type</b>	<b>Date of Manuf.</b>	<b>Date of Install.</b>	<b>Stack #</b>
Boiler #1	Bag Building	1.8	1,757	Natural gas	2004	2005	1
Boiler #2	Wash Bay	6.2	6,046	Natural gas	1986	2011	2
Boiler #3	Track 10	1.2	1,165	Natural gas	1998	2011	3
Boiler #4	Track 3	8.4	8,125	Natural gas	1989	2014	4
Boiler #5	Solutions	1.0	981	Natural gas	2014	2014	5

Savage 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, Savage 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

Process	Production Rate	Pollution Control Equipment	Stack #
Talc Transloading*	9.5 ton/hr	Dust collectors	6, 7, 8
Dry Chemical Mixing Tank	1.4 ton/hr	Dust collectors	7, 8
Soda Ash Transloading	30 ton/load	Enclosed conveyor	--

\*Although Savage still transloads talc, the facility no longer processes talc slurry and no longer stores talc in silos. These processes will be removed from the license and not discussed further.

### Chemical Usage

Process	Chemical Substance used in Process	Pollution Control Equipment	Percent VOC (%)	Percent HAP (%)
HCl Transloading	Hydrochloric Acid (HCl)	Vapor scrubbing system	0	35

### C. Insignificant Activities

Savage has several processes that are considered insignificant activities that they would like noted in their license for completeness purposes. Although considered insignificant activities, the processes are still subject to applicable requirements in this Air Emission License. These processes include the following:

1. Plastic Pellet Transfer

Savage vacuum-loads plastic pellets from a hopper into trucks. This transfer generates negligible dust emissions and is an insignificant activity per *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115, Appendix B, Section B.1.

2. Nalco Aqueous Chemical Transfer

Savage transfers Nalco liquid aqueous chemicals that contain no volatile organic compound (VOC) nor hazardous air pollutant (HAP) from rail cars to tank trailers. Because these liquid chemicals contain no VOC nor HAP, this process is an insignificant activity per 06-096 C.M.R. ch. 115, Appendix B, Section B.1.

3. Hydrogen Peroxide Transfer  
Savage transfers liquid hydrogen peroxide from rail cars to tank trailers. Hydrogen peroxide is not a VOC nor a HAP. Therefore, this process is an insignificant activity per 06-096 C.M.R. ch. 115, Appendix B, Section B.1.
4. Latex Transfer  
Savage transfers liquid latex from rail cars to tank trailers. Latex is not a VOC nor a HAP. Therefore, this process is an insignificant activity per 06-096 C.M.R. ch. 115, Appendix B, Section B.1.
5. MMA Transfer  
Savage transfers methyl methacrylate (MMA), which is both a VOC and HAP, from railcar to tank trailers using a closed loop, vapor balancing transfer system. The vapors move from one vehicle to the other as the product is transferred. There are no open vents or emissions to atmosphere. Therefore, this process is an insignificant activity per 06-096 C.M.R. ch. 115, Appendix B, Section B.1.
6. Sulfuric Acid Transfer  
Savage transfers sulfuric acid from railcars to tank trailers using a portable gantry without a scrubber system. Sulfuric acid is not a VOC nor a HAP. Therefore, this process is an insignificant activity per 06-096 C.M.R. ch. 115, Appendix B, Section B.1.
7. Sodium Hypochlorite Transfer and Mixing  
Savage receives 17% sodium hypochlorite by railcar which is loaded into trailers and diluted down to 12.5%. Sodium hypochlorite is not a VOC nor a HAP. Therefore, this process is an insignificant activity per 06-096 C.M.R. ch. 115, Appendix B, Section B.1.
8. Purate Transfer  
Savage transfers purate (an aqueous solution of sodium chlorate and hydrogen peroxide) from rail cars to a storage tank, where it is stored temporarily on site before being transferred to tank trailers. Purate is not a VOC nor a HAP. Therefore, these transfer processes and storage tank are insignificant activities per 06-096 C.M.R. ch. 115, Appendix B, Section B.1.
9. Ferrous Rock Transfer  
Savage transfers ferrous rock from truck to rail car using a front-end loader. This operation generates some fugitive dust, but dust emissions are below 1 ton per year of PM. Because emissions are below 1 tpy of a criteria pollutant, this transfer qualifies as an insignificant activity per 06-096 C.M.R. ch. 115, Appendix B, Section B.1

D. Definitions

*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.

E. 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 Savage 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 06-096 C.M.R. ch. 115.

F. Facility Classification

The facility is licensed as follows:

- As a natural minor source of air emissions, 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. Boilers

Savage operates five natural gas-fired boilers for heat and hot water needs. Boilers #1, #2, #3, #4, and #5 are rated at 1.8 MMBtu/hr, 6.2 MMBtu/hr, 1.2 MMBtu/hr, 8.4 MMBtu/hr, and 1.0 MMBtu/hr, respectively. Boilers #1, #2, #3, #4, and #5 were manufactured in 1998, 1986, 2011, 1981, and 1998, respectively. Boilers #1, #2, #3, #4, and #5 were installed in 2005, 2011, 2011, 2011, and 1998, respectively. Each boiler exhausts through its own stack.

#### 1. BPT Findings

The BPT emission limits for Boilers #1, #2, #3, #4, and #5 were based on the following:

##### Natural Gas

PM/PM<sub>10</sub>/PM<sub>2.5</sub> – 0.05 lb/MMBtu based on 06-096 C.M.R. ch. 115, BPT  
SO<sub>2</sub> – 0.6 lb/MMscf based on AP-42 Table 1.4-2 dated 7/98  
NO<sub>x</sub> – 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 #1, #2, #3, #4, and #5 are the following:

Unit	Pollutant	lb/MMBtu
Boiler #2	PM	0.05
Boiler #4	PM	0.05

Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.09	0.09	0.09	0.001	0.18	0.15	0.01
Boiler #2	0.31	0.31	0.31	0.004	0.60	0.51	0.03
Boiler #3	0.06	0.06	0.06	0.001	0.12	0.10	0.01
Boiler #4	0.42	0.42	0.42	0.005	0.81	0.68	0.04
Boiler #5	0.05	0.05	0.05	0.001	0.10	0.08	0.01

2. Visible Emissions

Visible emissions from Boilers #1, #2, #3, #4, and #5 shall not exceed 10% opacity on a six-minute block average basis.

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

Due to their size, the boilers 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]

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

Boilers #1, #2, #3, #4, and #5 are not 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 gas-fired boilers, which are exempt from 40 C.F.R. Part 63, Subpart JJJJJ. [40 C.F.R. §§ 63.11195 and 63.11237]

C. Transloading of Talc

Savage transfers loads of talc from railcar to trailer. A portable blower is used which is equipped with fabric filter dust collectors.

1. BPT Findings

Emissions from the talc transfer process shall be vented through fabric filters maintained for 99% removal efficiency. All components of transfer operations shall be maintained to prevent PM leaks. [06-096 C.M.R. ch. 115, BPT]

2. Visible Emissions

Visible emissions from each of the fabric filters shall be limited to 5% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

D. Transloading of Hydrochloric Acid

Savage transloads solutions of hydrochloric acid (HCl) from railcars to tank trailers. HCl is not considered a VOC but is considered a HAP and is therefore a regulated pollutant.

Railcars arrive carrying 35% HCl solution, which is pumped into tank trailers using a portable gantry. Gases displaced from the tank trailer run through a vapor scrubbing system, which sprays the displaced gases with water to capture any HCl mist from the transloading. The scrubber is rated at greater than 99% control efficiency with estimated post-control emissions of 0.0001 lb/hr of HCl.

The pH of the scrubber water is checked at least once per day. When the pH of the scrubber water drops to below 1.0, the water is pumped into an HCl railcar and returned to the customer.

1. BPT Findings

The BPT requirements for the HCl scrubber system were based on data provided by the scrubber manufacturer. Emissions of HCl from the scrubber are determined to be approximately 0.0001 lb/hr. Operating the HCl scrubber at 8,760 hours per year would create less than 0.1 ton/yr or HCl emissions. The Department finds that BPT for HCl emissions from this system shall be operation of the HCl scrubber system whenever HCl is being transloaded and following the described pH testing and replacement protocol. [06-096 C.M.R. ch. 115, BPT]

2. Visible Emissions

Visible emissions from the HCl scrubber shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

3. Periodic Monitoring

Periodic monitoring for the HCl scrubber shall include recordkeeping to document the dates of transloading of HCl and the number of railcars transferred, the pH of the scrubber water at least once per day for each day transloading takes place, and the dates the scrubber water was replaced. [06-096 C.M.R. ch. 115, BPT]

E. Dry Chemical Mixing Tank

1. BPT Findings

To meet the requirements of BPT for control of particulate matter (PM), emissions from the Dry Chemical Mixing Tank shall be vented through two fabric filter dust collectors. All components of the Dry Chemical Mixing Tank and associated dust collectors shall be maintained to prevent PM leaks. A log documenting all maintenance performed on the Dry Chemical Mixing Tank and associated dust collectors shall be kept. [06-096 C.M.R. ch. 115, BPT]

2. Visible Emissions

Visible emissions from the two dust collector vents shall not exceed 10% opacity on a six-minute block average basis. Savage shall take corrective action if visible emissions from the dust collectors exceed 5% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101 § 3(B)(3)]

F. Soda Ash Transfer

Savage transfers soda ash from rail cars to tank trailers. The soda ash drops from the bottom of the rail car through a funnel onto a conveyor. The enclosed conveyor brings the soda ash up to the top of the tank trailer where it drops down a chute into the trailer.

The Soda Ash Transfer Process is used intermittently. When in operation, Savage transfers approximately seven loads per month at thirty tons per load. Due to the low number of loads transferred and the minimal amount of generated fugitive dust, installation of a baghouse for this process is not economically justifiable. However, this determination may be revisited should the scope of the process change.

1. BPT Findings

To control particulate matter (PM), Savage shall use an enclosed conveyor and telescoping chute whenever soda ash is transferred as described above. All components of the soda ash transfer equipment shall be maintained so as to prevent PM leaks. A log documenting the number of loads of soda ash transferred per month shall be kept. [06-096 C.M.R. ch. 115, BPT]

2. Visible Emissions

Visible emissions from soda ash transfer operations shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101 § 3(B)(4)]



G. Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity on a five-minute block average basis. [06-096 C.M.R. ch. 101 § 3(C)]

H. General Process Emissions

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 § 3(B)(4)]

I. 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:

- Operating each boiler for 8,760 hr/yr;
- Operation of the HCl scrubber for 8,760 hrs/yr; and
- The assumption that PM emissions from the remaining process equipment are unquantifiable.

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 <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	HCl
Boiler #1	0.4	0.4	0.4	--	0.8	0.6	--	--
Boiler #2	1.4	1.4	1.4	--	2.6	2.2	0.1	--
Boiler #3	0.3	0.3	0.3	--	0.5	0.4	--	--
Boiler #4	1.8	1.8	1.8	--	3.6	3.0	0.2	--
Boiler #5	0.2	0.2	0.2	--	0.4	0.4	--	--
HCl Scrubber	--	--	--	--	--	--	--	0.1
<b>Total TPY</b>	<b>4.1</b>	<b>4.1</b>	<b>4.1</b>	<b>--</b>	<b>7.9</b>	<b>6.6</b>	<b>0.3</b>	<b>0.1</b>

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 <sub>10</sub>	25
PM <sub>2.5</sub>	15
SO <sub>2</sub>	50
NO <sub>x</sub>	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 Savage 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-702-71-K-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 commencing 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**

A. Emissions shall not exceed the following:

Emission Unit	Pollutant	lb/MMBtu	Origin and Authority
Boiler #2	PM	0.05	06-096 C.M.R. ch. 115, BPT
Boiler #4	PM	0.05	06-096 C.M.R. ch. 115, BPT

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

Emission Unit	PM (lb/hr)	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)	SO <sub>2</sub> (lb/hr)	NO <sub>x</sub> (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	0.09	0.09	0.09	0.001	0.18	0.15	0.01
Boiler #2	0.31	0.31	0.31	0.004	0.60	0.51	0.03
Boiler #3	0.06	0.06	0.06	0.001	0.12	0.10	0.01
Boiler #4	0.42	0.42	0.42	0.005	0.81	0.68	0.04
Boiler #5	0.05	0.05	0.05	0.001	0.10	0.08	0.01

C. Visible emissions from Boilers #1, #2, #3, #4, and #5 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 3(A)(3)]

**(18) Transloading of Talc**

A. Emissions from the talc transfer process shall be vented through fabric filters maintained for 99% removal efficiency. All components of transfer operations shall be maintained to prevent PM leaks. [06-096 C.M.R. ch. 115, BPT]

B. Visible emissions from each of the fabric filters shall be limited to 5% opacity on a 6-minute block average basis. [06-096 C.M.R. ch. 115, BPT]

**(19) Transloading of Hydrochloric Acid**

A. The HCl scrubber system shall be operated whenever HCl is being transloaded, and Savage shall follow the scrubbing liquid pH testing and replacement protocol as described in this license. [06-096 C.M.R. ch. 115, BPT]

B. Visible emissions from the HCl scrubber shall not exceed 10% opacity on a six-minute block average. [06-096 C.M.R. ch. 115, BPT]

C. Periodic monitoring for the HCl scrubber shall include recordkeeping to document the dates of transloading of HCl and the number of railcars transferred, the pH of the scrubber water at least once per day for each day transloading takes place, and the dates the scrubber water was replaced. [06-096 C.M.R. ch. 115, BPT]

**(20) Dry Chemical Mixing Tank**

- A. Emissions from the Dry Chemical Mixing Tank shall be vented through two fabric filter dust collectors. All components of the Dry Chemical Mixing Tank and associated dust collectors shall be maintained to prevent PM leaks. A log documenting all maintenance performed on the Dry Chemical Mixing Tank and associated dust collectors shall be kept. [06-096 C.M.R. ch. 115, BPT]
- B. Visible emissions from the two dust collector vents shall not exceed 10% opacity on a six-minute block average basis. Savage shall take corrective action if visible emissions from either dust collector exceed 5% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 3(B)(3)]

**(21) Soda Ash Transfer**

- A. Savage shall use an enclosed conveyor and telescoping chute whenever soda ash is transferred as described above. All components of the soda ash transfer equipment shall be maintained so as to prevent PM leaks. A log documenting the number of loads of soda ash transferred per month shall be kept. [06-096 C.M.R. ch. 115, BPT]
- B. Visible emissions from soda ash transfer operations shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 3(B)(4)]

**(22) Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity on a five-minute block average basis. [06-096 C.M.R. ch. 101, § 3(C)]

**(23) 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, § 3(B)(4)]

- (24) 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, Savage may be required to submit additional information. Upon written request from the Department, Savage 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 2<sup>nd</sup> DAY OF OCTOBER, 2023.

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: March 6, 2023

Date of application acceptance: March 6, 2023

Date filed with the Board of Environmental Protection:

This Order prepared by Kendra Nash, Bureau of Air Quality.

