



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

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**Western Polymer Corporation
Aroostook County
Fort Fairfield, Maine
A-817-71-D-R/T**

**Departmental
Findings of Fact and Order
Air Emission License
Renewal and Transfer**

FINDINGS OF FACT

After review of the air emissions license renewal and transfer applications, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., §344 and §590, and 06-096 CMR 115 (as amended), the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Western Polymer Corporation (Western Polymer) has requested the transfer of the Starch Partners, LLC (d/b/a Aroostook Starch Company) air emission license to Western Polymer. Western Polymer also submitted a renewal application for the operation of the starch plant in Fort Fairfield, Maine.

Air Emission License A-817-71-C-R was issued to Starch Partners, LLC (d/b/a Aroostook Starch Company) on July 8, 2008. Western Polymer submitted a renewal application for the facility prior to the expiration date.

This license addresses both the transfer and the renewal for the facility located at 145 Presque Isle Street, Fort Fairfield, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04533-0017
(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

Boilers

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Install. Date</u>	<u>Stack #</u>
Boiler #1	25.1	179.5	#1 and #2 fuel oil/diesel	2001	1
Boiler #2	25.1	179.5	#1 and #2 fuel oil/diesel	2001	1

Process Equipment

	<u>Max. Raw Material Production Rate</u>	<u>Pollution Control Equipment</u>
Starch Dryer 1	3.09 tons/hr starch	Cyclone, Scrubber
Starch Dryer 2	3.09 tons/hr starch	Cyclone, Scrubber
Starch Dryer 3*	1.1 tons/hr protein	Cyclone, Scrubber

* This unit was used in the past as mainly a protein dryer which also could dry starch depending on the need, but it is to be licensed as a starch dryer.

C. Application Classification

The application for Western Polymer 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 and transfer of currently licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended). The facility is considered a natural minor based on the emissions potential calculated using worst-case 8760 hours/year operation.

II. TRANSFER REQUIREMENTS

A. Title, Right, or Interest

In their application dated June 28, 2013, Western Polymer submitted copies of a receiver's deed transferring ownership of the land and building to LTWAW, LLC. In turn, LTWAW, LLC leases the property to Western Polymer. Western Polymer owns all of the equipment and is the business operating entity. The lease between the two companies is a one year lease that is automatically renewed at the end of the term of each successive year, from year to year, unless otherwise

terminated by either party in writing at least 1 year in advance of the term. The parties have provided sufficient evidence of title, right, or interest in the facility to allow the transfer of the facility's licenses provided the lease is not terminated.

B. Technical Capacity and Intent

Western Polymer's acquisition of the facility is not expected to result in any significant change in the equipment or operations. A number of the previous company's experienced staff was rehired. Western Polymer also currently operates two other starch manufacturing sites in the United States. The information regarding Western Polymer provides sufficient evidence that the company has the technical capacity and intent to comply with their air emission license.

C. Full Name and Address

The full name and address of the new owner is:

Western Polymer Corporation
145 Presque Isle Street
Fort Fairfield, ME 04742

The corporate address is:
Western Polymer Corporation
32 Road R SE
Moses Lake, WA 98837

D. Certification

Western Polymer certifies that there will be no increase in air emissions beyond that provided for in the existing licenses, either in quantity or type.

III. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for 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.

Before proceeding with the control requirements for each unit, a general process description is provided to identify where the equipment fits into the process.

Process Description

Processed raw starch is brought in from other facilities. The starch goes through a staged process that removes impurities. The 'cleaning' process consists of tanks to get the correct thickness of slurry, refining units and filters in series to remove dirt and other impurities, and chemical additives to remove any bacteria and neutralize the product. The next steps are the drying and final separation stages. The material is mixed with hot air (supplied by the boilers) and sent into a vertical run of pipe (the ventilator). The pipe is formed into a large inverted U which enters a cyclone. The cyclone separates the starch particulate from the gas stream and sends the refined starch on to the packaging system. The remaining air (mixed with approximately 1-5% starch) enters the scrubber. A water spray contacts the remaining particulate in the gas stream and through an entrainment stage, the water/starch mixture exits the scrubber as a slurry. There are three starch cyclone-scrubber systems.

The starch is then packaged as product. The pulp and water mixture is trucked to another facility in the area. In addition, some of the concentrated fruit-water, which is a liquid waste produced during the refining process, may be used as a soil amendment.

B. Boilers 1 and 2

Boilers 1 and 2 are Cleaver Brooks package boilers, each rated at 25.1 MMBtu/hr, capable of firing #1 and #2 fuel oil and diesel fuel. The boilers provide steam for building heat and production purposes. The boilers were installed in 2001 and both exhaust through a common stack with a height of 82 feet, inner diameter of 3.7 feet, and an exit cone diameter of 3 feet.

Due to the size and year of installation, the boilers are subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989.

1. BPT Findings

The BPT emission limits for the boilers were based on the following for #2 fuel oil:

- PM/PM₁₀ – 0.025 lb/MMBtu based a previous BACT analysis
- SO₂ – based on firing 0.3% sulfur #2 fuel oil; 0.3 lb/MMBtu
- NO_x – low NO_x burners, flue gas recirculation, and 0.2 lb/MMBtu
- CO – Good combustion, 1.7 lb/hr
- VOC – Good combustion, 0.7 lb/hr
- Opacity – previous BACT

The BPT emission limits for the boilers are the following:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler 1 (25.1 MMBtu/hr) #2 fuel oil	0.63	0.63	7.53	5.02	1.70	0.70
Boiler 1 (25.1 MMBtu/hr) #2 fuel oil	0.63	0.63	7.53	5.02	1.70	0.70

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

Western Polymer shall be limited to 2,260,838 gallons/yr combined of #1 fuel oil, #2 fuel oil, or diesel fuel based on a 12 month rolling total.

Western Polymer has a maximum sulfur fuel content limit of 0.3% for #1 fuel oil, #2 fuel oil, or diesel. Along with the annual fuel limit, the sulfur content limit was established in the previous license and keeps the facility below the tons per year modeling thresholds for SO₂.

Prior to July 1, 2016, or by the date otherwise stated in 38 MRSA §603-A(2)(A)(3), the #2 fuel oil fired in Boilers 1 and 2 shall have a maximum sulfur content of 0.3% by weight. Per 38 MRSA §603-A(2)(A)(3), beginning July 1, 2016, or on the date specified in the statute, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm), and beginning January 1, 2018, or on the date specified in the statute, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm). The specific dates contained in this paragraph reflect the current dates in the statute as of the effective date of this license; however, if the statute is revised, the facility shall comply with the revised dates upon promulgation of the statute revision.

2. Periodic Monitoring

Periodic monitoring for the boilers shall include recordkeeping to document fuel use both on a monthly and 12 month rolling total basis. Documentation shall include the type of fuel used and sulfur content of the fuel.

3. 40 CFR Part 63 Subpart JJJJJ

Boilers 1 and 2 may be subject to the *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* (40 CFR Part 63 Subpart JJJJJ). The units are considered existing oil boilers.

For informational purposes, a summary of the currently applicable federal 40 CFR Part 63 Subpart JJJJJ requirements is listed below. At this time, the Department has not taken delegation of this area source MACT (Maximum Achievable Control Technology) rule promulgated by EPA, however Western Polymer is still subject to the requirements. Notification forms and additional rule information can be found on the following website:
<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

a. Compliance Dates, Notifications, and Work Practice Requirements

i. Initial Notification of Compliance

An Initial Notification submittal to EPA is due no later than January 20, 2014. [40 CFR Part 63.11225(a)(2)]

ii. Boiler Tune-Up Program

(a) A boiler tune-up program shall be implemented to include the initial tune-up of applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(1)]

(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 5 MMBtu/hr, boilers

- with oxygen trim system, 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 5 MMBtu/hr, boilers with oxygen trim system, 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) After conducting the initial boiler tune-up, a Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(b)]
- (d) The facility shall implement a boiler tune-up program after the initial tune-up and initial compliance report (called a Notification of Compliance Status) has been submitted.
1. 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>	
Seasonal (see definition §63.11237)	Every 5 years
Limited use (see definition §63.11237)	Every 5 years
With a heat input capacity of <5MMBtu/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]

2. The tune-up compliance report shall be maintained onsite and, if requested, submitted to EPA. The report shall contain the concentration of CO in the effluent stream (ppmv) and oxygen in volume percent, measured at high fire or typical operating load, before and after the boiler tune-up, a description of any corrective actions taken as part of the tune-up of the boiler, and the types and amounts of fuels used over the 12 months prior to the tune-up of the boiler. [40 CFR Part 63.11223(b)(6)] The compliance report shall also include the company name and address; a compliance statement signed by a responsible official certifying truth, accuracy, and completeness; and a description of any deviations and corrective actions. [40 CFR Part 63.11225(b)]

iii. Energy Assessment

Boilers 1 and 2 may be subject to the following energy assessment requirement since the units are greater than 10 MMBtu/hr:

- (a) A one-time energy assessment shall be performed by a qualified energy assessor on the applicable boilers no later than March 21, 2014. [40 CFR Part 63.11196(a)(3)]
- (b) The energy assessment shall include a visual inspection of the boiler system; an evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating

constraints; an inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator; a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage; a list of major energy conservation measures that are within the facility's control; a list of the energy savings potential of the energy conservation measures identified; and a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

[40 CFR Part 63, Table 2(4)]

(c) A Notification of Compliance Status shall be submitted to EPA no later than July 19, 2014. [40 CFR Part 63.11225(a)(4) and 40 CFR Part 63.11214(c)]

b. Recordkeeping

Records shall be maintained consistent with the requirements of 40 CFR Part 63 Subpart JJJJJ including the following [40 CFR Part 63.11225(c)]: copies of notifications and reports with supporting compliance documentation; 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; documentation of fuel type(s) used monthly by each boiler; the occurrence and duration of each malfunction of the boiler; and actions taken during periods of malfunction to minimize emissions and actions taken to restore the malfunctioning boiler to its usual manner of operation. Records shall be in a form suitable and readily available for expeditious review.

Note: EPA will require submission of Notification of Compliance Status reports for tune-ups and energy assessments through their electronic reporting system. However, the system will not be in place until October 2013, so sources may submit the written NOCS to the EPA Administrator. [63.1125(a)(4)(vi)]

C. Starch Dryers 1, 2, and 3

The three starch dryers are flash dryers. Starch Dryers 1 and 2 are each rated at a maximum raw starch processing rate of 3.09 tons/hr and Starch Dryer 3 is rated at a maximum raw starch processing rate of 1.1 tons/hr. All three units were installed in 2001 and each is controlled by a cyclone and scrubber unit. In years past, Starch Dryer 3 was used mainly as a protein dryer, but in the recent past was also used to process starch. Western Polymer has proposed to license the unit as a starch dryer.

The starch process also includes use of sodium hypochlorite (NaOCl) as a 12.5% solution and sodium bisulfite (NaHSO₄) as a 38% solution. These compounds are not listed by EPA as hazardous air pollutants; however Western Polymer does keep inventory records of these compounds.

1. BPT Findings

The cyclones are rated at 95-99% efficiency for the removal of starch particulate from the gas stream and the scrubbers are rated at 99.95% efficiency.

The calculations for particulate matter emissions from each of Starch Dryers 1 and 2 were based on the following (maximum raw material process rate each of 3.09 tons/hr, equating to 6180 lb/hr): using a more conservative 95% cyclone efficiency, it is estimated that 309 lb/hr of starch reaches each starch scrubber and using a 99.95% scrubber efficiency, it is estimated that starch emissions from each scrubber exhaust is 0.15 lb/hr.

The calculations for particulate matter emissions from Starch Dryer 3 were based on the following (maximum raw material process rate of 1.1 tons/hr, equating to 2200 lb/hr): using a more conservative 95% cyclone efficiency, it is estimated that 110 lb/hr of starch reaches the starch scrubber and using a 99.95% scrubber efficiency, it is estimated that starch emissions from the scrubber exhaust is 0.06 lb/hr.

BPT for each of the starch dryers is the use of a cyclone and scrubber unit and the following emission limits:

<u>Unit</u>	<u>PM (lb/hr)</u>	<u>PM₁₀ (lb/hr)</u>
Starch Dryer 1 System	0.15	0.15
Starch Dryer 2 System	0.15	0.15
Starch Dryer 3 System	0.06	0.06

Opacity from each dryer cyclone and scrubber unit shall be limited to 10%, based on a 6 minute average.

2. Periodic Monitoring

Periodic monitoring for the starch dryers shall include recordkeeping in a maintenance log for the dryers, cyclones, and scrubbers to document maintenance activities and malfunctions, including dates, times, and corrective actions taken (if applicable).

D. Fugitive Emissions

Visible emissions from a fugitive emission source (including handling systems, material stockpiles, and roadways) shall not exceed an opacity of 20%, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20% in any one (1) hour.

Western Polymer uses a 25% sodium hydroxide (NaOH) solution for wastewater pH adjustment. This compound is not listed by EPA as a hazardous air pollutant; however Western Polymer does keep inventory records usage.

E. Annual Emissions

1. Total Annual Emissions

Western Polymer shall be restricted to the following annual emissions, based on a 12 month rolling total. The tons per year limits were calculated based on a fuel oil limit of 2,260,838 gallons per year and particulate emissions from the process (using worst-case 8760 hrs/yr for all three starch dryers):

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boilers	4.0	4.0	47.5	31.7	10.7	4.4
Dryers	1.6	1.6	-	-	-	-
Total TPY	5.6	5.6	47.5	31.7	10.7	4.4

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans*, 40 CFR Part 52, Subpart A, §52.21 Prevention of Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: Carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO₂e).

Based on the facility's fuel use limit(s), the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory*

Greenhouse Gas Reporting, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, Western Polymer is below the major source threshold of 100,000 tons of CO₂e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

IV. AMBIENT AIR QUALITY ANALYSIS

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

Pollutant	Tons/Year
PM ₁₀	25
SO ₂	50
NO _x	50
CO	250

The total facility licensed emissions 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.

ORDER

Based on the above findings, the Department concludes that the applicant for the air emission license transfer has the capacity to satisfy all applicable statutory criteria and hereby APPROVES the transfer of Air Emission License A-817-71-C-R, from Starch Partners LLC (d/b/a Aroostook Starch Company) to Western Polymer Corporation, subject to all conditions attached to them.

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-817-71-D-R/T subject to 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.

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.A. §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 CMR 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 CMR 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 CMR 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353-A. [06-096 CMR 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 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 CMR 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 CMR 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 CMR 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 CMR 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR 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 CFR 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 CMR 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 such test results, 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 CFR 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 CMR 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 Part 70 license requirement. [06-096 CMR 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 CMR 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 CMR 115]

SPECIFIC CONDITIONS

(16) Transfer

The expiration date of this Air Emission License (A-817-71-D-R/T) is ten years from the effective date of the license signature unless a timely and complete renewal application is submitted prior to the expiration date or as stated in the following paragraph.

Western Polymer Corporation's current lease agreement for the use of the property is annually subject to automatic renewal at the end of the term for each successive year, from year to year, unless otherwise terminated by either party in writing at least 1 year in advance of the term. If the annual lease of the property is terminated by either party, Western Polymer Corporation shall notify the Department prior to expiration of the lease and the air emission license shall expire upon lease expiration (if prior to the license expiration date) unless the air emission license is surrendered, transferred, or some other appropriate action is taken to maintain the license in accordance with applicable statutes and rules.

(17) Boilers 1 and 2

A. Fuel

1. Total fuel use for Boilers 1 and 2 shall not exceed a total of 2,260,838 gal/yr of #1 fuel oil, #2 fuel oil, or diesel fuel based on a 12 month rolling total basis. [06-096 CMR 115, BPT]
2. Prior to July 1, 2016 or the date specified in 38 MRSA §603-A(2)(A)(3), the #2 fuel oil, #1 fuel oil, or diesel fired in the boilers shall have a maximum sulfur content of 0.3% by weight. [06-096 CMR 115, BPT]
3. Beginning July 1, 2016 or on the date specified in 38 MRSA §603-A(2)(A)(3), the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm). [38 MRSA §603-A(2)(A)(3)]
4. Beginning January 1, 2018 or on the date specified in 38 MRSA §603-A(2)(A)(3), the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm). [38 MRSA §603-A(2)(A)(3)]
5. Compliance shall be demonstrated by fuel records from the supplier showing the quantity, type, and the percent sulfur of the fuel delivered (if applicable). Records of annual fuel use shall be kept on a monthly and 12-month rolling total basis. [06-096 CMR 115, BPT]

B. Emissions from Boilers 1 and 2 shall each not exceed the following:

Emission Unit	PM (lb/MMBtu)	NO _x (lb/MMBtu)	Origin and Authority
Boiler 1	0.025	0.20	06-096 CMR 115, BPT
Boiler 2	0.025	0.20	06-096 CMR 115, BPT

C. Emissions from Boilers 1 and 2 shall not exceed the following [06-096 CMR 115, BPT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler 1	0.63	0.63	7.53	5.02	1.70	0.70
Boiler 2	0.63	0.63	7.53	5.02	1.70	0.70

D. Visible emissions from the combined stack shall not exceed 20% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period. [06-096 CMR 115, BPT]

E. 40 CFR Part 60, Subpart Dc

Western Polymer shall comply with all requirements of 40 CFR Part 60, Subpart Dc applicable to Boilers 1 and 2 including, but not limited to, the following:

1. Western Polymer shall record and maintain records of the amounts of each fuel combusted during each day or, if applicable, monthly records with fuel certifications. [40 CFR §60.48c(g)]
2. Western Polymer shall submit to EPA and the Department semi-annual reports. These reports shall include the calendar dates covered in the reporting period and records of fuel supplier certifications. The semi-annual reports are due within 30 days of the end of each 6-month period.
3. The following address for EPA shall be used for any reports or notifications required to be copied to them:

Compliance Clerk
USEPA Region 1
5 Post Office Sq. Suite 100
Boston, MA 02109-3912

(18) **Starch Dryer Systems 1, 2, and 3** (including dryers, cyclones, and scrubbers)

A. Emissions from each of the starch dryers shall be controlled by the use of a cyclone and scrubber unit. [06-096 CMR 115, BPT]

- B. Emissions from each of the starch dryer systems, consisting of the dryer, the cyclone and the scrubber, shall not exceed the following [06-096 CMR 115, BPT]:

Unit	PM (lb/hr)	PM ₁₀ (lb/hr)
Starch Dryer 1 System	0.15	0.15
Starch Dryer 2 System	0.15	0.15
Starch Dryer 3 System	0.06	0.06

- C. Opacity from each starch dryer system shall be limited to 10%, based on a 6 minute average. [06-096 CMR 115, BPT]
- D. Western Polymer shall keep a maintenance log for the starch dryer systems to document maintenance activities and dryer, cyclone, or scrubber malfunctions. Recordkeeping for maintenance activities shall include the date and maintenance performed. Recordkeeping for malfunctions shall include the date, reason for the malfunction, and explanation of any correction actions taken (if applicable), including the date and time of when the malfunction was resolved. [06-096 CMR 115, BPT]

(19) **Fugitive Emissions**

Visible emissions from a fugitive emission source (including handling systems, material stockpiles, and roadways) shall not exceed an opacity of 20%, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20% in any one (1) hour. [06-096 CMR 101]

(20) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (as amended), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of either:

- 1) A computer program and accompanying instructions supplied by the Department; or
- 2) A written emission statement containing the information required in 06-096 CMR 137.

The emission statement must be submitted as specified by the date in 06-096 CMR 137.

Western Polymer Corporation
Aroostook County
Fort Fairfield, Maine
A-817-71-D-R/T

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- (21) Western Polymer 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.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 29 DAY OF October, 2013.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Maia Allen Robert Corne for
PATRICIA W. AHO, COMMISSIONER

The term of this license shall be ten (10) years from the signature date above, except as noted in Condition (16).

[Note: If a complete renewal application, as determined by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 MRSA §10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the renewal of the license.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: July 1, 2013

Date of application acceptance: July 1, 2013

Date filed with the Board of Environmental Protection:

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.



