



DEPARTMENT ORDER

**Regional School Unit #14 –
 Windham Campus
 Cumberland County
 Windham, Maine
 A-1051-71-B-R (SM)**

**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

Regional School Unit #14 – Windham Campus (Windham) has applied to renew their Air Emission License permitting the operation of emission sources associated with their educational facility.

The equipment addressed in this license is located at 404-408 Gray Road, Windham, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Boilers

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type, % sulfur	Installation Date	Stack #
WHS Boiler #1	2.84	2780 scf/hr	Natural Gas, negligible	2002	1
		19.6 gal/hr	Distillate Fuel, 0.5%		
WHS Boiler #2	5.19	5087 scf/hr	Natural Gas, negligible	2002	2
		36 gal/hr	Distillate Fuel, 0.5%		
WHS Boiler #3	5.19	5087 scf/hr	Natural Gas, negligible	2002	2
		36 gal/hr	Distillate Fuel, 0.5%		
WMS Boiler #4	2.84	2780 scf/hr	Natural Gas, negligible	2003	3
		19.6 gal/hr	Distillate Fuel, 0.5%		

WMS Boiler #5	2.84	2780 scf/hr	Natural Gas, negligible	2002	3
		19.6 gal/hr	Distillate Fuel, 0.5%		
WPS Boiler #6	2.50	2450 scf/hr	Natural Gas, negligible	1989	4
		17.4 gal/hr	Distillate Fuel, 0.5%		
WPS Boiler #7	2.50	2450 scf/hr	Natural Gas, negligible	1989	4
		17.4 gal/hr	Distillate Fuel, 0.5%		
WFA Boiler #8	1.14	1115 scf/hr	Natural Gas, negligible	2007	5

Generators

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate	Fuel Type, % sulfur	Installation Date
WHS Generator #1	3.03	2967 scf/hr	Natural Gas, negligible	2003

Process Equipment

Equipment	Location	Control Device
Woodworking	WHS Carpentry Shop	Fabric Filters
Woodworking	WMS Carpentry Shop	Cyclone

Fuel Storage

Equipment	Capacity	Fuel Stored
WPS Oil Tank	12,000 gallons	Distillate

C. Definitions

Distillate Fuel. For the purposes of this license, *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.

D. Application Classification

The application for Windham 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 (CMR) 115 (as amended).

With the annual fuel limit on the boilers and the operating hours restriction on the emergency generator, Windham is licensed below the major source thresholds for criteria pollutants and is considered a synthetic minor. Windham is also licensed below the major source thresholds for hazardous air pollutants (HAPs) and is considered an area source of HAPs.

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 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.

B. Boilers #1 through #8

The RSU #14 – Windham Campus is a contiguous property consisting of a Windham High School, Windham Middle School, Windham Primary School and Field Allen School. Windham uses a total of eight boilers to satisfy heating and hot water needs for these buildings.

Windham High School Boilers #1, #2 and #3

Each of the three Windham High School (WHS) boilers were manufactured and installed in 2002. Boiler #1 has a maximum design capacity of 2.84 MMBtu/hour while WHS Boilers #2 and #3 each have a design capacity of 5.19 MMBtu/hr. All three boilers are capable of firing either natural gas or distillate fuel.

Windham Middle School Boilers #4 and #5

Windham Middle School (WMS) Boilers #4 and #5 were manufactured and installed in 2003 and 2002, respectively. Boilers #4 and #5 each have a maximum design

capacity of 2.84 MMBtu/hour and each boiler is capable of firing either natural gas or distillate fuel.

Windham Primary School Boilers #6 and #7

Windham Primary School (WPS) Boilers #6 and #7 were both manufactured and installed in 1989; with each boiler having a maximum design capacity of 2.50 MMBtu/hour. Each boiler is capable of firing either natural gas or distillate fuel.

Windham Field Allen School Boiler #8

Windham Field Allen School (WFA) Boiler #8 was manufactured and installed in 2007, has a maximum design capacity of 1.14 MMBtu/hour and fires only natural gas.

1. BPT Findings

The BPT emission limits for Boilers #1 through #8 when firing natural gas were based on the following:

PM/PM ₁₀	0.05 lb/MMBtu based on 06-096 CMR 115, BPT
SO ₂	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
Opacity	06-096 CMR 101

The BPT emission limits for Boilers #1 through #7 when firing distillate fuel were based on the following:

PM/PM ₁₀	0.08 lb/MMBtu based on 06-096 CMR 115, BPT
SO ₂	0.5 lb/MMBtu, firing 0.5% S distillate fuel
NO _x	0.35 lb/MMBtu, previous BACT determination
CO	5.0 lb/1000 gallons, AP-42, Table 1.3-1, dated 5/10
VOC	0.34 lb/1000 gallons, AP-42, Table 1.3-3, dated 5/10
Opacity	06-096 CMR 101

When firing natural gas, the BPT emission limits for Boilers #2 and #3 are the following:

Equipment	Pollutant	lb/MMBtu
Boiler #2 & #3	PM	0.05

When firing distillate fuel, the BPT emission limits for Boilers #2 and #3 are the following:

Equipment	Pollutant	lb/MMBtu
Boiler #2 & #3	PM	0.08

Emissions from the Windham boilers shall not exceed the following:

Equipment	Fuel Type	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	Natural Gas	0.14	0.14	0.01	0.28	0.23	0.02
	Distillate	0.22	0.22	1.38	0.96	0.10	0.01
Boiler #2	Natural Gas	0.26	0.26	0.01	0.51	0.43	0.03
	Distillate	0.40	0.40	2.54	1.76	0.18	0.01
Boiler #3	Natural Gas	0.26	0.26	0.01	0.51	0.43	0.03
	Distillate	0.40	0.40	2.54	1.76	0.18	0.01
Boiler #4	Natural Gas	0.14	0.14	0.01	0.28	0.23	0.02
	Distillate	0.22	0.22	1.38	0.96	0.10	0.01
Boiler #5	Natural Gas	0.14	0.14	0.01	0.28	0.23	0.02
	Distillate	0.22	0.22	1.38	0.96	0.10	0.01
Boiler #6	Natural Gas	0.13	0.13	0.01	0.25	0.21	0.01
	Distillate	0.19	0.19	1.23	0.85	0.09	0.01
Boiler #7	Natural Gas	0.13	0.13	0.01	0.25	0.21	0.01
	Distillate	0.19	0.19	1.23	0.85	0.09	0.01
Boiler #8	Natural Gas	0.06	0.06	0.01	0.11	0.09	0.01

The total fuel use for all Windham boilers shall not exceed a combined total of 66,300 MMBtu/year of heat energy input from both distillate fuel and natural gas, on a calendar-year basis.

When firing distillate fuel, visible emissions from each boiler shall not exceed 20% opacity on a six-minute block average basis.

When firing natural gas, visible emissions from each boiler shall not exceed 10% opacity on a six-minute block average basis.

Fuel Sulfur Content Requirements

Windham boilers #1 through #7 are licensed to fire distillate fuel which, by definition, has a sulfur content of 0.5% or less by weight. Per 38 M.R.S. §603-A(2)(A)(3), as of July 1, 2018, no person shall import, distribute, or offer for sale any distillate fuel with a sulfur content greater than 0.0015% by weight (15 ppm). Therefore, beginning July 1, 2018, the distillate fuel purchased or otherwise obtained for use in Boilers #1 through #7 shall not exceed 0.0015% by weight (15 ppm).

2. Periodic Monitoring

Periodic monitoring for all boilers shall include recordkeeping to document fuel use both on a monthly and calendar-year total basis. Documentation shall include the type of fuel used and sulfur content of the fuel, if applicable.

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

Due to their sizes, none of the boilers are subject to the New Source Performance Standards (NSPS) 40 C.F.R. Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hour 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

All Windham boilers 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) since the units are considered existing gas-fired boilers.

Gas-fired boilers are exempt from 40 C.F.R. Part 63, Subpart JJJJJ. However, boilers which fire fuel oil are not. A “gas-fired boiler” is defined as any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of forty-eight hours during any calendar year. [40 C.F.R. §63.11237]

All Windham boilers are considered to be existing boilers because they were in operation prior to June 4, 2010. If any Windham boiler converts back to firing distillate fuel in the future, they would become subject to applicable requirements of 40 C.F.R. Part 63 Subpart JJJJJ as an existing boiler at the time it is converted back to oil.

If any Windham boiler no longer meets the definition of a gas-fired boiler as defined above, Windham shall conduct a tune-up within 180 days of the effective date of the fuel switch. Notification of such changes must be submitted according to 40 C.F.R. §63.11225(g). [40 C.F.R. §63.11210(h)]

C. Emergency Generator #1

Windham operates one Cummins emergency generator, designated WHS Generator #1, which is rated at 3.03 MMBtu/hour (285 kW output) and fires natural gas at a maximum rate of 2967 scf/hour. WHS Generator #1 is a stationary unit which was manufactured and installed in 2003.

1. BPT Findings

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

PM/PM ₁₀	0.05 lb/MMBtu based on 06-096 CMR 115, BPT
SO ₂	0.000588 lb/MMBtu, AP-42, Table 3.2-2, dated 7/00
NO _x	15.12 g/hp-hr, from manufacturer's potential emissions data
CO	1.17 g/hp-hr, from manufacturer's potential emissions data
VOC	0.21 g/hp-hr, from manufacturer's potential emissions data
Opacity	06-096 CMR 101

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

Equipment	Pollutant	lb/MMBtu
WHS Generator # 1	PM	0.05

Emissions from Generator #1 shall not exceed the following:

Equipment	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
WHS Generator #1	0.15	0.15	0.01	12.77	0.99	0.18

Visible emissions from WHS Generator #1 shall not exceed 10% opacity on a six-minute block average basis.

WHS Generator #1 shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. There is no limit on the number of hours of emergency operation. WHS Generator #1 shall be equipped with a non-resettable hour-meter to record operating time. To demonstrate compliance with the operating hours limit, Windham shall keep records of the total hours of operation and the hours of emergency operation for WHS Generator #1.

WHS Generator #1 is only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. WHS Generator #1 is not to be used for prime power when reliable offsite power is available; nor to operate or to be contractually obligated to be available for

more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity.

2. New Source Performance Standards (NSPS)

WHS Generator #1 is not subject to the New Source Performance Standards (NSPS) 40 C.F.R. Part 60, Subpart JJJJ, *Standards of Performance for Spark Ignition Internal Combustion Engines (SI ICE)*, since the unit was manufactured prior to January 1, 2009. [40 C.F.R. §60.4230]

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

The federal regulation 40 C.F.R. Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines*, is not applicable to WHS Generator #1. WHS Generator #1 is considered an existing, emergency stationary reciprocating internal combustion engine at an area HAP source. However, WHS Generator #1 is considered exempt from the requirements of Subpart ZZZZ since it is categorized as a residential, commercial, or institutional emergency engine and it does not operate and is not contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in 40 C.F.R. §63.6640(f)(4)(ii).

Operation of WHS Generator #1 such that it exceeds 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in §63.6640(f)(4)(ii), would cause the engine to be subject to 40 C.F.R. Part 63, Subpart ZZZZ, and require compliance with all applicable requirements.

D. Annual Emissions

1. Total Annual Emissions

Windham shall be restricted to the following annual emissions, on a calendar-year basis. The tons per year limits were calculated based on Windham being limited to a facility-wide heat input limit of 66,300 MMBtu/year (approximately equivalent to 473,600 gallons/year of distillate fuel or 65,000,000 scf/year of natural gas) for the boilers and the operation of 100 hours/year for WHS Generator #1:

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

Equipment	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boilers #1 - #8	2.7	2.7	16.7	11.6	2.7	0.2
WHS Generator #1	0.1	0.1	0.1	0.6	0.1	0.1
Total TPY	2.8	2.8	16.8	12.2	2.8	0.3

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 C.F.R. 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).

The quantity of CO₂e emissions from this facility is less than 100,000 tons per year, based on the following:

- the types of fuel being fired;
- the facility’s fuel use limit;
- worst case emission factors from the following sources: U.S. EPA’s AP-42, the Intergovernmental Panel on Climate Change (IPCC), and 40 C.F.R. Part 98, *Mandatory Greenhouse Gas Reporting*; and
- global warming potentials contained in 40 C.F.R. Part 98.

No additional licensing actions to address GHG emissions are required at this time.

III. 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 licensed annual emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM	25
PM ₁₀	25
SO ₂	50
NO _x	100
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.

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-1051-71-B-R, 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 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 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 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 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) Boilers #1 - #8

A. Fuel

1. Windham Boilers #1 through #7 are licensed to fire natural gas and/or distillate fuel. [06-096 CMR 115, BPT]
2. Windham Boiler #8 is licensed to fire natural gas only. [06 096 CMR 115, BPT]
3. Total facility-wide heat input into all Windham boilers combined shall be limited to 66,300 MMBtu/year, on a calendar-year basis. [06-096 CMR 115, BPT]
4. When firing distillate fuel prior to July 1, 2018, Windham shall fire distillate fuel with a maximum sulfur content not to exceed 0.5% by weight. [06-096 CMR 115, BPT]
5. Beginning July 1, 2018, Windham shall not purchase or otherwise obtain distillate fuel with a maximum sulfur content that exceeds 0.0015% by weight (15 ppm). [06-096 CMR 115, BPT]
6. 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 calendar year basis. [06-096 CMR 115, BPT]

B. Emissions shall not exceed the following:

Equipment	Fuel Type	Pollutant	lb/MMBtu	Origin and Authority
Boilers #2 & #3	Natural Gas	PM	0.05	06-096 CMR 115, BPT
	Distillate	PM	0.08	

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

Equipment	Fuel Type	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #1	Natural Gas	0.14	0.14	0.01	0.28	0.23	0.02
	Distillate	0.22	0.22	1.38	0.96	0.10	0.01
Boiler #2	Natural Gas	0.26	0.26	0.01	0.51	0.43	0.03
	Distillate	0.40	0.40	2.54	1.76	0.18	0.01
Boiler #3	Natural Gas	0.26	0.26	0.01	0.51	0.43	0.03
	Distillate	0.40	0.40	2.54	1.76	0.18	0.01
Boiler #4	Natural Gas	0.14	0.14	0.01	0.28	0.23	0.02
	Distillate	0.22	0.22	1.38	0.96	0.10	0.01
Boiler #5	Natural Gas	0.14	0.14	0.01	0.28	0.23	0.02
	Distillate	0.22	0.22	1.38	0.96	0.10	0.01
Boiler #6	Natural Gas	0.13	0.13	0.01	0.25	0.21	0.01
	Distillate	0.19	0.19	1.23	0.85	0.09	0.01
Boiler #7	Natural Gas	0.13	0.13	0.01	0.25	0.21	0.01
	Distillate	0.19	0.19	1.23	0.85	0.09	0.01
Boiler #8	Natural Gas	0.06	0.06	0.01	0.11	0.09	0.01

D. Visible Emissions

1. When firing natural gas, visible emissions from each boiler stack shall not exceed 10% opacity on a six-minute block average basis. [06-096 CMR 101]
2. When firing distillate fuel, visible emissions from each boiler stack shall not exceed 20% opacity on a six-minute block average basis. [06-096 CMR 101]

(17) WHS Generator #1

- A. WHS Generator #1 shall be limited to 100 hours of operation per calendar year, excluding operating hours during emergency situations. [06-096 CMR 115, BPT]

- B. Windham shall keep records that include maintenance conducted on WHS Generator #1 and the hours of operation recorded through the non-resettable hour meter. Documentation shall include the number of hours WHS Generator #1 operated for emergency purposes, including what classified the operation as emergency, and the number of hours Generator #1 operated for non-emergency purposes. [06-096 CMR 115, BPT]
- C. If WHS Generator #1 is operated during a period of demand response or deviation from standard voltage or frequency, or to supply power during a non-emergency situation as part of a financial arrangement with another entity, Windham shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [06-096 CMR 115, BPT]
- D. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
WHS Generator #1	PM	0.05	06-096 CMR 103

- E. Emissions from WHS Generator #1 shall not exceed the following [06-096 CMR 115, BPT]:

Equipment	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
WHS Generator #1	0.15	0.15	0.01	12.77	0.99	0.18

- F. Visible Emissions

Visible emissions from WHS Generator #1 shall not exceed 10% opacity on a six-minute block average basis. [06-096 CMR 115, BPT]

- G. WHS Generator #1 is only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. Generator #1 is not to be used for prime power when reliable offsite power is available; nor to operate or to be contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity.

Regional School Unit #14 –
Windham Campus
Cumberland County
Windham, Maine
A-1051-71-B-R (SM)

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Departmental
Findings of Fact and Order
Air Emission License
Renewal

- (18) Windham 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 20 DAY OF November, 2016.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Core for
PAUL MERCER, 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.A. §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: June 20, 2016

Date of application acceptance: June 29, 2016

Date filed with the Board of Environmental Protection:

This Order prepared by Kevin J Ostrowski, Bureau of Air Quality.

