



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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DEPARTMENT ORDER

TRANSFLO Terminal Services, Inc.
Cumberland County
South Portland, Maine
A-1190-71-B-M

Departmental
Findings of Fact and Order
Air Emission License
Amendment #1

Findings of Fact

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

I. Registration

A. Introduction

TRANSFLO Terminal Services, Inc. (TRANSFLO) was issued Air Emission License A-1190-71-A-N on September 17, 2025, for the operation of emission sources associated with their rail loading and unloading facility.

This license completes the processing of the application with submission number 604125 as assigned by the Department (accepted 09/10/2026).

The equipment addressed in this license is located at 20 Rigby Rd, South Portland, Maine.

TRANSFLO has requested a minor revision to their license in order to add Natural Gasoline as a transferred material and to accept a cap of 5 tons per year of VOC from liquid transloading activities.

B. Emission Equipment

The following equipment is addressed in this air emission license amendment:

Process Equipment

Equipment	Transfer Rate *	Pollution Control Equipment
Liquid Transfer Operations	400 gallons/min	Vapor Balance

* Transfer rate is listed on a per transfer unit basis

C. 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 proposed change involves neither a physical change nor a change in the method of operation of the facility's equipment. It is therefore not a modification and has been processed as a minor revision pursuant to the requirements of *Major and Minor Source Air Emission License Regulations*, 06-096 Code of Maine Rules (C.M.R.) ch. 115.

D. Facility Classification

With the annual VOC limit from liquid transloading activities, the facility is licensed as follows:

- As a synthetic minor source of air emissions for criteria pollutants, because TRANSFLO is subject to license restrictions that keep facility emissions below major source thresholds for VOC; 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 new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 C.M.R. ch. 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental, and energy impacts.

B. VOC Limit From Liquid Transloading Activities

TRANSFLO has proposed to limit the emissions of VOC from liquid transloading activities to 5.0 tons per year on a calendar year basis. This limit will provide a method for the facility to petition the Department and obtain approval for the transloading of materials not explicitly listed in their air emission license which would have the potential to increase VOC emissions not exceeding the liquid transloading activities VOC limit, without the need to amend such license for each new material.

Compliance shall be demonstrated by recordkeeping including annual calculations of VOC emissions conducted in accordance with EPA's Compilation of Emission Factors (AP-42), Section 5.2, or other methods as approved by the Department.

C. Natural Gasoline

TRANSFLO has proposed adding Natural Gasoline to the list of transferable materials contained in the facility's current air emission license (A-1190-71-A-N, issued September 17, 2025). Natural Gasoline is a liquid mixture of hydrocarbons separated from raw natural gas that stays liquid at normal room temperature and pressure. The transferring of the new material would be in addition to the previously licensed estimated material throughputs.

1. BACT Discussion

TRANSFLO performed a BACT analysis where several control strategies were examined for the control of emissions from transloading Natural Gasoline.

Liquid transloading control options which were examined included oxidation, vapor combustion, vapor recovery, refrigeration condensing, carbon absorption, wet scrubbers, and the use of a vapor balance system. TRANSFLO proposed the use of a vapor balance system, which is considered the highest level of control for VOC from liquid transloading activities.

BACT for liquid transfer operations was determined to be the use of a vapor balance system when transferred material contains VOC or HAP, and the partial vapor pressure is greater than 5 mmHg (i.e., 0.1 psia).

The manways and other openings to the transport vessels carrying, or which most recently carried, VOC or HAP containing substances shall remain closed and sealed at all times, except as necessary to operate the liquid transfer equipment and vapor balance system.

TRANSFLO shall operate all transloading equipment according to its manufacturer's written instructions or TRANSFLO's written operating procedures. A copy of those instructions or procedures shall be provided to the Department upon request.

2. Visible Emissions

All visible emissions shall only be released from control equipment exhaust points and shall not exceed the applicable general process emissions limit.

3. Applicability of Federal and State Regulations

The facility is not subject to the requirements of *Degassing of Petroleum Storage Tanks, Marine Vessels, and Transport Vessels*, 06-096 C.M.R. ch. 170. TRANSFLO does not perform degassing of transport vessels.

The facility is not subject to the requirements of *Control of Petroleum Storage Facilities*, 06-096 C.M.R. ch. 171. TRANSFLO is not a storage facility and therefore does not meet the definition of petroleum storage facility in the rule.

D. 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 firing natural gas; and
- A VOC limit from liquid transloading activities of 5.0 tpy.

This information does not represent a comprehensive list of license restrictions or permissions. That information is provided in the Order section of this license.

Total Licensed Annual Emissions for the Facility

Tons/year

(used to calculate the annual license fee)

	PM	PM₁₀	PM_{2.5}	SO₂	NO_x	CO	VOC
Boilers (EUB1 and EUB2)	3.7	3.7	3.7	0.1	7.3	6.1	0.4
Liquid Transloading Activities VOC Limit	--	--	--	--	--	--	5.0
Total TPY	3.7	3.7	3.7	0.1	7.3	6.1	5.4

Pollutant	Tons/year
Single HAP	7.9
Total HAP	19.9

III. Ambient Air Quality Analysis

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

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

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

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 TRANSFLO 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 Amendment A-1190-71-B-M subject to the conditions found in Air Emission License A-1190-71-A-N, and the following conditions.

Severability. The invalidity or unenforceability of any provision of this License Amendment or part thereof shall not affect the remainder of the provision or any other provisions. This License Amendment shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

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Specific Conditions

The following are new sub-conditions of Condition (18) of A-1190-71-A-N:

(18) **Transloading**

G. TRANSFLO may transload Natural Gasoline. [06-096 C.M.R. ch. 115, BACT]

H. The manways and other openings to the transport vessels carrying, or which most recently carried, VOC or HAP containing substances shall remain closed and sealed at all times except as necessary to operate the liquid transfer equipment and vapor balance system. [06-096 C.M.R. ch. 115, BACT]

I. TRANSFLO shall not exceed 5.0 tons per calendar year of emissions of VOC from liquid transloading activities. Compliance shall be demonstrated by recordkeeping including annual calculations of VOC emissions conducted in accordance with EPA's Compilation of Emission Factors (AP-42), Section 5.2, or other methods as approved by the Department.
[06-096 C.M.R. ch. 115, BACT]

Done and Dated in Augusta, Maine this 13th day of OCTOBER, 2026.

Department of Environmental Protection

BY:


for Melanie Loyzim, Commissioner

The term of this license amendment shall be ten (10) years from the issuance of Air Emission License A-1190-71-A-N (issued 9/17/2025).

[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: 9/08/26

Date of application acceptance: 9/10/26

This Order prepared by Chris Ham, Bureau of Air Quality.