



DEPARTMENT ORDER

**Waste Management Disposal  
Services of Maine, Inc.  
d/b/a Crossroads Landfill  
Somerset County  
Norridgewock, Maine  
A-816-77-7-A**

**Departmental  
Findings of Fact and Order  
New Source Review  
NSR #7**

**FINDINGS OF FACT**

After review of the air emission license 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 (the Department) finds the following facts:

**I. REGISTRATION**

A. Introduction

FACILITY	Waste Management Disposal Services of Maine, Inc. (WMDSM) d/b/a Crossroads Landfill
LICENSE TYPE	06-096 C.M.R. ch. 115, Minor Modification
NAICS CODES	562212
NATURE OF BUSINESS	Solid Waste Landfill
FACILITY LOCATION	357 Mercer Road, Norridgewock, Maine

B. NSR License Description

Waste Management Disposal Services of Maine, Inc. (WMDSM) d/b/a Crossroads Landfill has requested a New Source Review (NSR) license amendment for the construction and operation of a biosolids processing facility.

C. Stationary Source Description

Maine Regional Conversion Facility, LLC (MRCF) will own and operate the biosolids processing facility on leased property that is part of the Crossroads Landfill facility. Both MRCF and WMDSM are subsidiaries of Waste Management Holding, Inc. and thus are under common control. Because MRCF and WMDSM are considered under common control, are part of the same industrial grouping, and are to be located on contiguous property, the biosolids processing facility is considered part of WMDSM's stationary source.

D. Emission Equipment

The following new equipment is addressed in this NSR license:

**Process Equipment**

Equipment	Production Rate	Pollution Control Equipment	Stack #
Biosolids Processing Facility	200 wet tons/day*	none	building vents

\* Approximate, does not represent a license limit.

**Emergency Generators**

Equipment	Max. Heat Input Capacity (MMBtu/hr)	Max. Output Capacity (kW)	Max. Firing Rate	Fuel Type	Mfr. Date
Generator #3	2.0	144*	1,968 cfh	natural gas	2023
			708 cfh	propane	

\* This number represents the maximum electrical output of the generator. The maximum output of the engine is 169 kW when firing propane and 193 kW when firing natural gas.

E. Definitions

Records or Logs mean either hardcopy or electronic records.

F. Project Description

WMDSM proposes to install a biosolids processing facility to meet the demand for sludge disposal from municipal waste treatment plants. The biosolids processing facility includes three sludge dryers located inside the processing building. As sludge passes through the enclosed dryer on belt conveyors, it is air-dried at low temperatures (~165 °F). Heat is provided by electric heat pumps. The moisture that is driven off is then condensed on the back side of the heat pump.

The biosolids processing facility will be powered by the existing landfill gas-to-energy engines (Engines #1 and #2). Engines #1 and #2 are not considered project-affected emission units because they are not expected to see any change in operation. Use of the engines is, and will continue to be, maximized to produce power based on landfill gas availability. With this project, some of the power produced will be used by the biosolids processing facility rather than being provided to the grid.

The sludge dryers are an enclosed system with no defined vents. However, emissions of volatile organic compounds (VOC) and total reduced sulfur (TRS) compounds may be released from the building vents. The project includes the construction of two connected buildings, a sludge receiving and storage building and a processing building containing the dryers. Each building will have a roof vent.

The proposed facility includes an odor control system for the two buildings. The odor control system uses ultraviolet (UV) bulb technology to ionize oxygen in the incoming air, which then reacts with and oxidizes hydrogen sulfide compounds in the room. In addition, the buildings are equipped with high-velocity exhaust systems that quickly disperse any odorous compounds to minimize the impact on nearby off-site areas. The odor control equipment is not considered air pollution control equipment and it is afforded no credit for reduction in emissions of VOC or TRS in this license. It is mentioned for completeness only.

The project also includes the installation of an emergency generator with a natural gas- or propane-fired engine.

G. Application Classification

All rules, regulations, or statutes referenced in this air emission license refer to the amended version in effect as of the issued date of this license.

The application for the proposed biosolids facility does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing, or recordkeeping requirements.

The modification of a major source is considered a major or minor modification based on whether or not expected emissions increases exceed the “Significant Emission Increase” levels as given in *Definitions Regulation*, 06-096 Code of Maine Rules (C.M.R.) ch. 100. For a major stationary source, the expected emissions increase from each new, modified, or affected unit may be calculated as equal to the difference between the post-modification projected actual emissions and the baseline actual emissions for each NSR regulated pollutant.

1. Baseline Actual Emissions

Baseline actual emissions (BAE) for existing affected emission units are equal to the average annual emissions from any consecutive 24-month period within the ten years prior to submittal of a complete license application. The selected 24-month baseline period can differ on a pollutant-by-pollutant basis. However, there are no existing

emission units which are considered “affected” by this project. As described earlier, the landfill gas-to-energy engines will not see any increase in production due to this project.

The only equipment addressed by this license are new emission units. Baseline actual emissions for new equipment are considered to be zero for all pollutants; therefore, the selection of a baseline year is unnecessary.

## 2. Projected Actual Emissions

New emission units must use potential to emit (PTE) emissions for projected actual emissions (PAE). Those emissions are presented in the following table.

### Projected Actual Emissions (same as PTE)

Equipment	PM (tpy)	PM <sub>10</sub> (tpy)	PM <sub>2.5</sub> (tpy)	SO <sub>2</sub> (tpy)	NO <sub>x</sub> (tpy)	CO (tpy)	VOC (tpy)	TRS (tpy)
Biosolids Processing Facility	–	–	–	–	–	–	8.7	2.4
Generator #3	–	–	–	–	0.2	0.4	–	–
<b>Total</b>	–	–	–	–	<b>0.2</b>	<b>0.4</b>	<b>8.7</b>	<b>2.4</b>

## 3. Emissions Increases

Emissions increases are calculated by subtracting BAE from the PAE. The emission increase is then compared to the significant emissions increase levels.

Pollutant	Baseline Actual Emissions (ton/year)	Projected Actual Emissions (ton/year)	Emissions Increase (ton/year)	Significant Emissions Increase Levels (ton/year)
PM	0	–	–	25
PM <sub>10</sub>	0	–	–	15
PM <sub>2.5</sub>	0	–	–	10
SO <sub>2</sub>	0	–	–	40
NO <sub>x</sub>	0	0.2	0.2	40
CO	0	0.4	0.4	100
VOC	0	8.7	8.7	40
TRS	0	2.4	2.4	10

4. Classification

Since emissions increases do not exceed significant emissions increase levels, this NSR license is determined to be a minor modification under *Minor and Major Source Air Emission License Regulations*, 06-096 C.M.R. ch. 115.

This NSR license is not licensing a new major stationary source of an NSR pollutant that is not greenhouse gases (GHG) nor is it authorizing a major modification for an NSR pollutant to an existing major stationary source. Therefore, greenhouse gases are not considered subject to regulation in this license pursuant to 40 C.F.R. §§ 51.166(b)(48)(iii - iv).

WMDSM has submitted an application to incorporate the requirements of this NSR license into the facility's Part 70 air emission license.

**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 as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 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. Biosolids Processing Facility

The sludge dryers are enclosed units with no defined vents. However, emissions of volatile organic compounds (VOC) and total reduced sulfur (TRS) compounds may be released from the vents of the building in which the sludge and dryers are located. The project includes the construction of two connected buildings, a sludge receiving and storage building and a processing building containing the dryers. Each building will have a roof vent. Fugitive emissions from the building vents are addressed in this section.

1. BACT Findings

a. Identify Potential Control Options

Potential control technologies considered for VOC and TRS emissions from the building vents include carbon adsorbers, condensers, flares, and thermal oxidizers.

Carbon Adsorption

With adsorption, VOC migrates from a gas stream to the surface of a solid material, usually activated carbon, where it is held by physical attraction. Periodically, the VOC is desorbed (usually through heating) as part of an adsorbent regeneration cycle. The VOC is then condensed and recovered or thermally destroyed.

Condensers

Condensation systems utilize a refrigeration source to cool the exhaust stream to convert the VOC from a gaseous phase to a liquid phase. They are most often used for high concentration exhaust streams.

Thermal Oxidizers

Thermal Oxidizers, including flares, raise the temperature of the exhaust stream to oxidize (burn) or pyrolyze (thermally break down) the constituents. Flares use a pilot light to expose the waste stream to an open flame. Regenerative thermal oxidizers (RTOs) use heat exchangers to preheat the exhaust and/or recover waste heat from the treated air stream.

In the case of hydrocarbons (including VOC), complete combustion produces carbon dioxide and water. Oxidation of TRS results in sulfur dioxide (SO<sub>2</sub>), which is a criteria pollutant.

b. Eliminate Infeasible Control Options

A search of EPA's RACT/BACT/LAER Clearinghouse (RBLC) did not identify any control technologies used to reduce VOC or TRS emission from biosolids processing, including processes with sludge drying.

While adsorption is commonly used to treat high volume, low concentration VOC gas streams, the large range of VOC contained in the exhaust prevent refinement and reuse as an option. WMDSM used the EPA Air Pollution Control Cost Manual<sup>1</sup> to estimate the cost of control for this technology. Based on the estimated pollutant

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<sup>1</sup> Section 3, Chapters 1 and 2, dated August 2019 and November 2017, respectively <https://www.epa.gov/economic-and-cost-analysis-air-pollution-regulations/cost-reports-and-guidance-air-pollution#cost%20manual>.

load in the building vents, the cost to control emissions is estimated to be at least \$21,000 per ton of VOC controlled and \$68,000 per ton of TRS controlled. Therefore, the use of carbon adsorption is not considered economically feasible for control of VOC or TRS from the building vents.

Condensers are typically used in exhaust streams that contain high concentrations of a relatively pure, light compound (e.g., gasoline). In this case, the nature of the condensable portion of the organic compounds in the exhaust from the building vents would likely result in fouling of a heat exchanger system which will prevent efficient and effective operation. Therefore, condensers are not considered technically feasible for control of VOC or TRS from the building vents.

Thermal oxidizers are a technically feasible option for control of both VOC and TRS from the building vents. WMDSM used the EPA Air Pollution Control Cost Manual to estimate the cost of control for this technology. Depending on the building vent considered and the type of thermal oxidizer, the cost of control varied significantly. However, all options exceeded \$42,000 per ton of pollutant controlled for VOC and \$135,000 per ton of pollutant controlled for TRS. Therefore, the use of thermal oxidizers, including flares, is not considered economically feasible for control of VOC or TRS from the building vents.

c. Ranking of Control Options

There are no control options that are both technically and economically feasible for control of emissions of VOC and TRS from the building vents.

d. Determination

The Department finds that there are no available feasible control options for reducing emissions of VOC or TRS from the building vents and that the existing annual facility-wide VOC emission limit of 39.9 tpy represents BACT for the biosolids processing facility.

The annual facility-wide limit on emissions of VOC shall remain unchanged at 39.9 tpy to avoid triggering requirements in of *Reasonably Available Control Technology for Facilities That Emit Volatile Organic Compounds (VOC-RACT)*, 06-096 C.M.R. ch. 134.

Actual emissions of VOC and TRS from the biosolids processing facility shall be calculated at least once annually (for VOC) and every three years (for TRS) as required by *Emission Statements*, 06-096 C.M.R. ch. 137. Emissions from the buildings shall be calculated by assuming the average flow rate and concentration of pollutants from building vents is the same as those used in the application for this license unless site-specific data approved by the Department becomes available. The sludge receiving and storage building shall be assumed to be emitting VOC and TRS during any day that sludge is present in the building. The processing building shall be assumed to be emitting VOC and TRS during all hours the dryers are operating.

## 2. Recordkeeping

Emissions of VOC and TRS from the biosolids processing facility shall be based on the following records:

- a. Days sludge is present in the sludge receiving and storage building;
- b. Hours of operation of the dryers in the processing building; and
- c. Average flow rate and pollutant concentration of the building vents. The assumptions used in the application associated with this license may be used if site-specific data is not available.

## C. Generator #3

WMDSM proposes to install and operate one new stationary emergency generator (Generator #3). Generator #3 is expected to be a Kohler model 150ERESC generator set, or similar, consisting of an engine and an electrical generator. The engine can fire either propane or natural gas. The generator has a maximum output of 144 kW while the engine has a rated output of approximately 226 HP (169 kW) when firing propane and 259 bhp (193 kW) when firing natural gas. WMDSM has not yet chosen the exact make and model generator for this project, so the unit has been conservatively assumed to be a 4-stroke, rich burn engine because the emission factors for NO<sub>x</sub> and CO for rich burn engines are higher than those for lean burn engines. Its maximum heat input is calculated to be 2.0 MMBtu/hr.

### 1. BACT Findings

Following is a BACT analysis for control of emissions from Generator #3.

- a. Particulate Matter (PM, PM<sub>10</sub>, PM<sub>2.5</sub>)  
WMDSM has proposed to burn only low-ash content fuels (propane or natural gas) in Generator #3 and the use of an engine compliant with 40 C.F.R. Part 60, Subpart JJJJ. Additional add-on pollution controls are not economically feasible



due to the cost of control equipment compared to the relatively small amount of pollutant controlled.

BACT for PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from Generator #3 is the firing of propane or natural gas, use of an engine compliant with 40 C.F.R. Part 60, Subpart JJJJ, and the emission limits listed in the table below.

b. Sulfur Dioxide (SO<sub>2</sub>)

WMDSM has proposed to fire only propane or natural gas in Generator #3. The use of either of these fuels results in minimal emissions of SO<sub>2</sub>, and additional add-on pollution controls are not economically feasible due to the cost of control equipment compared to the relatively small amount of pollutant controlled.

BACT for SO<sub>2</sub> emissions from Generator #3 is the use of propane or natural gas and the emission limits listed in the table below.

c. Nitrogen Oxides (NO<sub>x</sub>), Carbon Monoxide (CO), and Volatile Organic Compounds (VOC)

The engine associated with Generator #3 is certified to comply with the emission standards in 40 C.F.R. Part 60, Subpart JJJJ.

BACT for NO<sub>x</sub>, CO, and VOC emissions from Generator #3 is the use of an engine compliant with 40 C.F.R. Part 60, Subpart JJJJ and the emission limits in the table below.

2. Emission Limits

The BACT emission limits for Generator #3 are based on the following:

PM	- 0.01 lb/MMBtu based on AP-42 Table 3.2-3 dated 7/00
PM <sub>10</sub> /PM <sub>2.5</sub>	- 0.02 lb/MMBtu based on AP-42 Table 3.2-3 dated 7/00
SO <sub>2</sub>	- 5.88 x 10 <sup>-4</sup> lb/MMBtu based on AP-42 Table 3.2-2 dated 7/00
NO <sub>x</sub>	- 2.27 lb/MMBtu based on AP-42 Table 3.2-3 dated 7/00
CO	- 3.51 lb/MMBtu based on AP-42 Table 3.2-3 dated 7/00
VOC	- 0.0296 lb/MMBtu based on AP-42 Table 3.2-3 dated 7/00
Opacity	- 06-096 C.M.R. ch. 115, BACT

The BACT emission limits for Generator #3 are the following:

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)
Generator #3	0.02	0.04	0.04	–	4.56	7.06	0.06

Visible emissions from Generator #3 shall not exceed 10% opacity on a six-minute block average basis. Compliance shall be demonstrated by testing in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 upon request by the Department.

The Department has determined that the proposed BACT visible emission limit is more stringent than the applicable limit in 06-096 C.M.R. ch. 101. Therefore, the visible emission limit for the generators has been streamlined to the more stringent BACT limit, and only this more stringent limit shall be addressed further in this air emission license.

### 3. Chapter 169

*Stationary Generators*, 06-096 C.M.R. ch. 169 (Chapter 169), is applicable to Generator #3. It is an emergency generator powered by an engine with a rated output of less than 1,000 brake horsepower (747 kW). Chapter 169 identifies emission standards for generator engines subject to this chapter and stack height requirements for certain generator engines subject to this chapter.

#### a. Chapter 169 Emission Standards Requirements

For Generator #3, WMDSM shall comply with the emission standards for emergency generators by complying with the applicable standards contained in 40 C.F.R. Part 60, Subpart JJJJ. [06-096 C.M.R. ch. 169, § 4(B)(1)]

#### b. Chapter 169 Stack Height Requirements

Chapter 169 identifies stack height requirements for any stack used to exhaust a generator engine or combination of generator engines with a combined rated output equal to or greater than 1,000 brake horsepower (747 kW). Individual generator engines with a maximum power capacity of less than 300 kW are not included in the assessment of the combined generator power capacity exhausted through a common stack. [06-096 C.M.R. ch. 169, § 6]

There are no stack height requirements in Chapter 169 applicable to Generator #3 because it exhausts through its own stack and its rated output is less than 1,000 brake horsepower (747 kilowatts). [06-096 C.M.R. ch. 169, § 6]

4. 40 C.F.R. Part 60, Subpart JJJJ

*Standards of Performance for Spark Ignition Internal Combustion Engines*, 40 C.F.R. Part 60, Subpart JJJJ is applicable to the emergency engine listed above since the unit will be ordered after June 12, 2006, and manufactured after January 1, 2009. [40 C.F.R. § 60.4230] These requirements will be addressed in WMDSM's Part 70 license at the time this NSR license is incorporated.

By meeting the requirements of 40 C.F.R. Part 60, Subpart JJJJ, the unit also meets the requirements found in the *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 C.F.R. Part 63, Subpart ZZZZ. [40 C.F.R. § 63.6590(c)]

D. Incorporation Into the Part 70 Air Emission License

Pursuant to *Part 70 Air Emission License Regulations*, 06-096 C.M.R. ch. 140 § 1(C)(8), for a modification at the facility that has undergone NSR requirements or been processed through 06-096 C.M.R. ch. 115, the source must apply for an amendment to their Part 70 license within one year of commencing the proposed operations, as provided in 40 C.F.R. Part 70.5. An application to incorporate the requirements of this NSR license into the Part 70 air emission license has been submitted to the Department.

E. 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.

The totals listed are based on expected generation of gas from the landfill and do not reflect operation of all equipment at full capacity. Instead, they reflect maximum anticipated emissions associated with full operation of the engines with excess gas burned at the flares. WMDSM is restricted to the total emissions listed below based on a federally enforceable license condition.

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
Flare #1	1.3	1.3	1.3	37.4	5.2	28.2	–
Flare #3	3.9	3.9	3.9	112.3	15.6	84.8	–
LFGTE Engines #1 & #2	7.5	7.5	7.5	76.7	25.9	181.1	–
Emerg. Gen. #1	–	–	–	–	0.2	–	–
Emerg. Gen. #2	–	–	–	–	0.2	–	–
Emerg. Gen. #3	–	–	–	–	0.2	0.4	–
Biosolids Processing Facility	–	–	–	–	–	–	–
Facility-Wide	–	–	–	–	–	–	39.9
<b>Total TPY</b>	<b>12.7</b>	<b>12.7</b>	<b>12.7</b>	<b>226.4</b>	<b>47.3</b>	<b>294.5</b>	<b>39.9</b>

Pollutant	Tons/year
Single HAP	9.9
Total HAP	24.9

**III. AMBIENT AIR QUALITY ANALYSIS**

WMDSM previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (see license A-816-77-1-A issued on 7/11/08). An additional ambient air quality analysis is not required for this Part 70 license.

This determination is based on information provided by the applicant regarding the expected construction and operation of the proposed 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 WMDSM 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,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants New Source Review License A-816-77-7-A pursuant to the preconstruction licensing requirements of 06-096 C.M.R. ch. 115 and subject to the specific conditions below.

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.

**SPECIFIC CONDITIONS**

**(1) Biosolids Processing Facility**

- A. WMDSM is licensed to construct and operate a biosolids processing facility as outlined in this license. [06-096 C.M.R. ch. 115, BACT]
- B. Emissions from the buildings shall be calculated by assuming the average flow rate and concentration of pollutants from building vents is the same as those used in the application for this license unless site-specific data approved by the Department becomes available. The sludge receiving and storage building shall be assumed to be emitting VOC and TRS during any day that sludge is present in the building. The processing building shall be assumed to be emitting VOC and TRS during all hours the dryers are operating. WMDSM shall keep the following records in order to calculate emissions of VOC and TRS from the biosolids processing facility:
  - 1. Days sludge is present in the sludge receiving and storage building;
  - 2. Hours of operation of the dryers in the processing building; and
  - 3. Average flow rate and pollutant concentration of the building vents. The assumptions used in the application associated with this license may be used if site-specific data is not available.

[06-096 C.M.R. ch. 115, BACT]

(2) **Generator #3**

- A. WMDSM is licensed to fire only propane or natural gas in Generator #3.  
[06-096 C.M.R. ch. 115, BACT]
- B. WMDSM shall keep records of all maintenance conducted on the engine associated with Generator #3. [06-096 C.M.R. ch. 115, BACT]
- C. Emissions shall not exceed the following [06-096 C.M.R. ch. 115, BACT]:

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)
Generator #3	0.02	0.04	0.04	–	4.56	7.06	0.06

- D. Visible emissions from Generator #3 shall not exceed 10% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 115, BACT]
- E. Generator #3 shall meet the applicable requirements of 40 C.F.R. Part 60, Subpart JJJ.  
[06-096 C.M.R. ch. 115, BACT]
- F. WMDSM shall record data and maintain records for the following periodic monitoring values for Generator #3:
  - 1. Hours of operating time on a calendar year basis;
  - 2. Log of the duration and reasons for all operating times as they occur; and
  - 3. Records of all maintenance conducted.[06-096 C.M.R. ch. 115, BACT]

- (3) 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, WMDSM may be required to submit additional information. Upon written request from the Department, WMDSM 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 30<sup>th</sup> DAY OF NOVEMBER, 2023.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:  for  
MELANIE LOYZIM, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/6/2023

Date of application acceptance: 10/6/2023

Date filed with the Board of Environmental Protection:

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

