STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
17 STATE HOUSE STATION | AUGUSTA, MAINE 04333-0017
DEPARTMENT ORDER

Heidelberg Materials US Cement LLC	**Departmental**
Knox County	**Findings of Fact and Order**
Thomaston, Maine	**Air Emission License**
A-326-77-19-A	**NSR #16**

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	Heidelberg Materials US Cement LLC
License Type	06-096 C.M.R. ch. 115, Minor Modification
NAICS Codes	327310
Nature of Business	Cement Manufacturing
Facility Location	U.S. Route 1, Thomaston, Maine

This license completes the processing of applications with the following submission numbers as assigned by the Department: 602415 (accepted 12/5/2025) and 602682 (accepted 1/21/2026).

B. NSR License Description

Heidelberg Materials US Cement LLC (Heidelberg) has requested a New Source Review (NSR) license for the following:

- add a new pneumatic rail car unloading system (RCU1) and associated dust collection system,
- add two new portable cement transloading systems (PTL1 and PTL2) and associated dust collection systems, and
- amend NSR A-326-77-10-A (issued 11/30/2017) to reclassify the Auxiliary Kiln Drive Engine as an emergency engine.

C. Emission Equipment

The following new equipment is addressed in this NSR license:

Equipment	Production Rate	Pollution Control Equipment
RCU1	100 ton/hr	Dust Collector
PTL1	90 ton/hr	Dust Collector
PTL2	90 ton/hr	Dust Collector

The following existing equipment is affected, but not modified, by this project:

Stationary Engines

Equipment	Max. Input Capacity (MMBtu/hr)	Rated Output Capacity (HP)	Fuel Type	Firing Rate (gal/hr)	Date of Manuf.	Date of Install.
Backup Blower Engine*	1.0	139	Distillate fuel	8.0	2011	2017

***** Formerly designated Auxiliary Kiln Drive Engine

Process Equipment

Equipment Categories	Description	Control Equipment
Finish Grind Group	Finish Mill #1	Dust collectors (fabric filters)
Finish Grind Group	Finish Mill #2	Dust collectors (fabric filters)
Finish Grind Group	Finish Mill #3	Dust collectors (fabric filters)
Finish Grind Group	Thompson Silo #11	Dust collectors (fabric filters)
Finish Grind Group	Thompson Silo #12	Dust collectors (fabric filters)
Finish Grind Group	Hoch Silo	Dust collectors (fabric filters)
Finish Grind Group	Silo #30	Dust collectors (fabric filters)
Finish Grind Group	CT Hoppers	Dust collectors (fabric filters)
Pack and Ship Group	Packer #2	Dust collectors (fabric filters)
Pack and Ship Group	Packer #3	Dust collectors (fabric filters)
Pack and Ship Group	Packer #4	Dust collectors (fabric filters)
Pack and Ship Group	Hoch Silo Loading	Dust collectors (fabric filters)
Pack and Ship Group	Silo #30 Loading	Dust collectors (fabric filters)

D. Definitions

Records or *Logs* mean either hardcopy or electronic records.

E. Project Description

1. Portable Cement Transloading

During a trial approved by the Department running from May through October of 2025, Heidelberg evaluated the operation of the unloading of bulk cement and slag from rail cars and directly transloading the products to commercial transport tanker trucks. The transloading operation utilized a self-propelled (50 horsepower, distillate fuel-fired) portable conveying system designed to unload gravity-fed, bottom-dump rail cars. Due to the success of the trial, Heidelberg has proposed licensing two portable conveying systems.

2. Railcar Unloading Operations

Heidelberg utilizes the railroad for receiving and distributing products. Recent operational changes at the facility designed to maximize efficiencies as a cement and slag distribution facility require upgrades to the existing rail infrastructure to accommodate receiving inbound rail cars containing cement and slag material to be transferred into existing storage silos for distribution to local and regional customers. Heidelberg has proposed the construction of a new gravity dump railcar receiving system consisting of a pneumatic transport pump system and associated dust collector.

3. Existing Engine Reclassification

Heidelberg was issued NSR license A-326-77-10-A on November 30, 2017, permitting the use of the Auxiliary Kiln Drive Engine. The Auxiliary Kiln Drive Engine was used to keep the kiln rotating in emergency situations such as power outage or failure of the primary drive system, and in non-emergency situations such as kiln startup and shutdown. The kiln system has been permanently shut down, so Heidelberg will repurpose the engine as an emergency-use only backup power supply to operate a pneumatic blower system for the transport of cement and slag material.

F. 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 railcar unloading system 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) 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. Heidelberg has proposed using 1/2020 – 12/2021 as the 24-month baseline period from which to determine baseline actual emissions for all pollutants for emission units affected as part of this project.

   BAE for existing modified and affected equipment are based on actual annual emissions reported to the Department through *Emissions Statements*, 06-096 C.M.R. ch. 137 with the following exceptions:

   a. The annual emissions report collects data on emissions of PM_{10} and $PM_{2.5}$ but not PM. PM emissions from all equipment were determined in a similar manner as the filterable portions of the PM_{10} emissions.

   b. Emissions of PM_{10} and $PM_{2.5}$ in the annual emissions report are for the filterable portion only. Emissions of PM_{10} and $PM_{2.5}$ represented below were adjusted to include emissions of condensable particulate matter (CPM).

   BAE for new equipment are considered to be zero for all pollutants.
   The results of this baseline analysis are presented in the table below.

Baseline Actual Emissions (1/2020 – 12/2021 Average)

Equipment	PM (tpy)	PM_{10} (tpy)	$PM_{2.5}$ (tpy)
Finish Mill #1	10.35	8.70	4.66
Finish Mill #2	0.00	0.00	0.00
Finish Mill #3	0.14	0.12	0.06
Thompson Silos	0.82	0.68	0..37
Packer #2	0.05	0.04	0.02
Packer #3	0.05	0.04	0.02
Packer #4	0.05	0.05	0.02

Equipment	PM (tpy)	PM_{10} (tpy)	$PM_{2.5}$ (tpy)
Hoch Silo	1.07	0.90	0.48
Silo #30	0.01	0.01	0.00
CT Hoppers	0.00	0.00	0.00
Total	**12.54**	**10.54**	**5.26**

2. Projected Actual Emissions

Projected actual emissions (PAE) are the maximum actual annual emissions anticipated to occur in any one of the five years (12-month periods) following the date existing units resume regular operation after the project or any one 12-month period in the ten years following if the project involves increasing the unit's design capacity or its potential to emit of a regulated pollutant.

New emission units must use potential to emit emissions for projected actual emissions.

Affected equipment includes any new or physically modified equipment as well as upstream or downstream activities such the increased use of the Finish Grind Group and Pack and Ship Group.

Affected equipment includes upstream activities such as the Finish Grind Group and Pack and Ship Group. Projected actual emissions from this equipment were conservatively calculated assuming operating at maximum capacity.

Projected actual emissions from the affected equipment are shown below.

Projected Actual Emissions

Equipment	PM (tpy)	PM_{10} (tpy)	$PM_{2.5}$ (tpy)
Finish Mill #1	15.13	12.71	6.81
Finish Mill #2	0.0	0.0	0.0
Finish Mill #3	0.66	0.56	0.30
Thompson Silos	0.41	0.35	0.19
Packer #2	0.16	0.13	0.07
Packer #3	0.16	0.13	0.07
Packer #4	0.17	0..14	0.08
Hoch Silo	1.46	1.22	0.65

Equipment	PM (tpy)	PM_{10} (tpy)	$PM_{2.5}$ (tpy)
Silo #30	0.04	0.04	0.02
CT Hoppers	0.67	0.56	0.30
Portable Transloading	0.1	0.08	0.04
RCU1	2.45	2.06	1.10
Total	**21.41**	**17.84**	**9.63**

3. Emissions Increases

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

Pollutant	Baseline Actual Emissions 1/20 – 12/21 (ton/year)	Projected Actual Emissions (ton/year)	Emissions Increase (ton/year)	Significant Emissions Increase Levels (ton/year)
PM	12.54	21.41	8.87	25
PM_{10}	10.54	17.84	7.30	15
$PM_{2.5}$	5.26	9.63	4.37	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).

An application to incorporate the requirements of this NSR license into the Part 70 air emission license shall be submitted no later than 12 months from commencement of operations associated with this project.

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. Portable Cement Transloading (PTL1 and PTL2)

1. Equipment Description

The proposed Portable Cement Transloading equipment are two 263D Portable Chain Articulating Conveyors manufactured by Wilson Manufacturing & Design, Inc. They each have a rated material handling rate of 100 ton/hr. Heidelberg observed an average material handling rate of 90 ton/hr during their trial period. The portable transloaders are each equipped with a dust collection system rated for up to 100 ton/hr of product throughput.

2. BACT Determination

BACT for control of particulate matter from the Portable Cement Transloaders is the use of dust collectors and a visible emission limit of 10% on a 6-minute block average basis.

3. The Portable Cement Transloading equipment is subject to 40 C.F.R. Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry*. See section II(D) of this NSR license for applicable requirements.

C. Rail Car Unloading Operations (RCU1)

1. Equipment Description

The proposed project will feature a new, covered, drive-over receiving pit which will contain a pneumatic transport pump system capable of discharging rail cars at a rate of one rail car per hour (approximately 100 tons/hr). The new transport

system will deliver cement and slag through a section of new pipeline which will connect to the existing pipeline that distributes to the existing storage and truck loading silos.

The new pneumatic transport system will include a Fuller-Kinyon pump designed to transport cementitious materials from the rail cars to the existing storage silos. The pumping system will include a dust collection system consisting of an 800 cubic feet per minute system designed to control particulate emissions. The dust collection system is a pulse-jet design utilizing cartridge style filters with a maximum air-to-cloth ratio of 3:1. Differential pressure across the system will be monitored with photohelic differential pressure controllers.

2. BACT Determination

   BACT for control of particulate matter from RCU1 operation is the use of dust collectors (fabric filters) and a visible emission limit of 10% on a 6-minute block average basis.

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

   The rail car unloading system is subject to 40 C.F.R. Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry*. See section II(D) of this NSR license for applicable requirements.

D. <u>National Emission Standards for Hazardous Air Pollutants (NESHAP): 40 C.F.R. Part 63, Subpart LLL</u>

The Portable Cement Transloading Equipment (PTL1 and PTL2) and Rail Car Unloading System (RCU1) are subject to the following requirements of 40 C.F.R. Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry*:

1. Visible emissions from each affected storage bin, conveying system transfer point, bagging system, and bulk loading or unloading system shall not exceed 10% opacity on a 6-minute block average basis. [40 C.F.R. §§ 63.1345 and 63.1348(a)(2)]

2. Heidelberg shall conduct an initial performance test for opacity in accordance with 40 C.F.R. § 63.1349(b)(2) and 40 C.F.R. Part 60, Appendix A, Method 9 within 180 days after startup. The duration of the performance test must be three hours (i.e., 30, 6-minute averages), except that the duration of the

performance test may be reduced to one hour if both of the following conditions are met:

a. There are no individual readings greater than 10% opacity;

b. There are no more than three readings of 10% opacity for the first 1-hour period.

[40 C.F.R. § 63.7(a)(2), 63.1348(a)(2), and 63.1349(b)(2)]

3. Heidelberg shall demonstrate continuous compliance with the opacity standard in accordance with 40 C.F.R. § 63.1350(f), summarized below:

a. Conduct a monthly 10-minute visible emission test of each affected source in accordance with 40 C.F.R. Part 60, Appendix A, Method 22.

(1) If no visible emissions are observed in six consecutive monthly tests for any affected source, the frequency of performance testing may be reduced from monthly to semi-annually for that source. If visible emissions are observed during a semi-annual test, monthly testing must be resumed.

(2) If no visible emissions are observed during the semi-annual test for any affected source, the frequency of performance testing may be reduced from semi-annually to annually for that source. If visible emissions are observed during an annual test, monthly testing must be resumed.

(3) If visible emissions are observed during any Method 22 performance test, 30 minutes of opacity observations, recorded at 15 second intervals, must be conducted in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 within one hour of observing visible emissions.

(4) Method 22 visible emissions monitoring is not required for any totally enclosed conveying system transfer point.

(5) Method 22 visible emissions monitoring of any partially enclosed or unenclosed conveying system transfer point located within a building shall be conducted for each such conveying system transfer point located within the building, or for the building itself.
[40 C.F.R. § 63.1350(f)(1)(vi)]

(6) If visible emissions from a building are monitored, the requirements of this section apply to the monitoring of the building, and Heidelberg must also test visible emissions from each side, roof, and vent of the building for at least 10 minutes. [40 C.F.R. § 63.1350(f)(1)(vii)]

b. If visible emissions are observed during any Method 22 visible emissions test, Heidelberg must initiate corrective action within one hour.

[40 C.F.R. §§ 63.1348(b)(3) and 63.1350(f)]

4. Heidelberg shall continue to comply with the reporting and recording requirements as specified in air emission license A-362-70-E-R/A (issued March 3, 2016) according to 40 C.F.R. §§ 63.1354 and 63.1355.

E. Backup Blower Engine

The Backup Blower Engine was originally licensed as The Auxiliary Kiln Drive Engine in NSR A-326-77-10-A (11/30/2017). It is a US EPA certified Tier 3 distillate fuel-fired engine rated at 139 HP (approximately 1.0 MMBtu/hr) and was manufactured in 2011. Heidelberg is repurposing the engine as an emergency-use only backup power supply to operate a pneumatic blower system for the transport of cement and slag material and has requested the change be included in its air emission license.

1. BPT Findings

The BACT emission limits for the Backup Blower Engine were established in NSR A-326-77-10-A (11/30/17) and are not being changed by this amendment. Emission limits are reproduced here for reference.

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Backup Blower Engine	0.12	0.12	0.12	0.01	4.41	0.95	0.35

Visible emissions from the Backup Blower Engine shall not exceed 20% opacity on a six-minute block average basis.

2. New Source Performance Standards

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 C.F.R. Part 60, Subpart IIII is applicable to the emergency engine listed above since the unit was ordered after July 11, 2005, and manufactured after April 1, 2006. [40 C.F.R. § 60.4200]

a. Emergency Engine Designation and Operating Criteria

Under 40 C.F.R. Part 60, Subpart IIII, a stationary reciprocating internal combustion engine (ICE) is considered an **emergency** stationary ICE (emergency engine) as long as the engine is operated in accordance with the following criteria. Operation of an engine outside of the criteria specified below may cause the engine to no longer be considered an emergency engine under 40 C.F.R. Part 60, Subpart IIII, resulting in the engine being subject to requirements of this subpart applicable to **non-emergency** engines.

(1) Emergency Situation Operation (On-Site)

There is no operating time limit on the use of an emergency engine to provide electrical power or mechanical work during an emergency situation. Examples of use of an emergency engine during emergency situations include the following:

- Use of an engine to produce power for critical networks or equipment (including power supplied to portions of a facility) because of failure or interruption of electric power from the local utility (or the normal power source, if the facility runs on its own power production);
- Use of an engine to mitigate an on-site disaster;
- Use of an engine to pump water in the case of fire, flood, natural disaster, or severe weather conditions; and
- Similar instances.

(2) Non-Emergency Situation Operation

An emergency engine may be operated up to a maximum of 100 hours per calendar year for maintenance checks, readiness testing, and other non-emergency situations as described below.

(i) An emergency engine may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government; the manufacturer; the vendor; the regional transmission organization or equivalent balancing authority and transmission operator; or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE more than 100 hours per calendar year.

(ii) An emergency engine may be operated for up to 50 hours per calendar year for other non-emergency situations. **However, these operating hours are counted as part of the 100 hours per calendar year operating limit described in paragraph (2) and (2) (i) above.**

The 50 hours per calendar year operating limit for other non-emergency situations cannot be used for peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[40 C.F.R. §§ 60.4211(f) and 60.4219]

b. 40 C.F.R. Part 60, Subpart IIII Requirements

(1) Manufacturer Certification Requirement
The engine shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in 40 C.F.R. § 60.4202. [40 C.F.R. § 60.4205(b)]

(2) Ultra-Low Sulfur Fuel Requirement
The fuel fired in the engine shall not exceed 15 ppm sulfur (0.0015% sulfur). [40 C.F.R. § 60.4207(b)]

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 60.4209(a)]

(4) Operation and Maintenance Requirements
The engine shall be operated and maintained according to the manufacturer's emission-related written instructions. Heidelberg may only change those emission-related settings that are permitted by the manufacturer. [40 C.F.R. § 60.4211(a)]

Heidelberg shall have available for review by the Department a copy of the manufacturer's emission-related written instructions for engine operation and maintenance. [06-096 C.M.R. ch. 115, BPT]

(5) Annual Time Limit for Maintenance and Testing
As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a

facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity).
[40 C.F.R. § 60.4211(f)]

(6) Initial Notification Requirement
No initial notification is required under 40 C.F.R. Part 60, Subpart IIII for emergency engines. [40 C.F.R. § 60.4214(b)]

(7) Recordkeeping
Heidelberg shall keep records that include the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 60.4214(b)]

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

Pursuant to 40 C.F.R. § 63.6590(c), stationary compression ignition engines subject to regulations under 40 C.F.R. Part 60, Subpart IIII must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 C.F.R. Part 60, Subpart IIII. No further requirements apply for such engines under Subpart ZZZZ. [40 C.F.R. § 63.6590(c)]

F. 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.

G. 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 the Kiln System for 8,760 hrs/year (maximum for PM, PM_{10});
- Annual limits for the Kiln System and Clinker Cooler (maximum for SO_2, NO_x, CO, and VOC);
- Processing 150,000 ton/year in the Slag Dryer;
- Firing 113,424 MMBtu/year of fuel in the Slag Dryer Burner consisting of up to 110,638 MMBtu/year of specification waste oil and using worst case emission factors;
- Operating each emergency generator for 100 hrs/year; and
- Operating the Backup Blower Engine for 100 hrs/year.
- Particulate emissions from process equipment, including Rail Car Unloading equipment and Portable Cement Transloading equipment, is not quantified for fee purposes.

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	NH_3
Kiln System	41.2	41.2	306.6	1,533.0	843.2	57.5	32.9
Clinker Cooler	40.1	40.1	--	--	--	--	--
Emergency Generator	--	--	--	0.8	0.2	0.1	--
Quarry #1 Pump	--	--	--	0.4	0.1	--	--
Backup Blower Engine	--	--	--	0.2	0.1	--	--
Slag Dryer	3.5	2.5	39.0	8.2	4.7	0.6	--
Total TPY	**84.8**	**83.8**	**345.6**	**1,542.6**	**848.3**	**58.2**	**32.9**

III. Ambient Air Quality Analysis

Heidelberg previously submitted an ambient air quality impact analysis outlined in air emission license A-326-71-U-A (dated November 19, 2002) demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (AAQS). An additional ambient air quality impact analysis is not required for this NSR 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,

- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants New Source Review License A-326-77-19-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) **Portable Cement Transloading (PTL1 and PTL2)**

Heidelberg shall control particulate matter emissions from PTL1 and PTL2 through the use of dust collectors. [06-096 C.M.R. ch. 115, BACT]

(2) **Railcar Unloading Operations (RCU1)**

Heidelberg shall control particulate matter emissions from the Railcar Unloading Operations through the use of dust collectors (fabric filters).
[06-096 C.M.R. ch. 115, BACT]

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

The Portable Cement Transloading and Railcar Unloading Operations shall meet the applicable requirements of 40 C.F.R. Part 63, Subpart LLL, including, but not limited to, the following:

A. Visible emissions from each affected storage bin, conveying system transfer point, bagging system, and bulk loading or unloading system shall not exceed 10% opacity on a 6-minute block average basis. [40 C.F.R. §§ 63.1345 and 63.1348(a)(2)]

B. Heidelberg shall conduct an initial performance test for opacity in accordance with 40 C.F.R. § 63.1349(b)(2) and 40 C.F.R. Part 60, Appendix A, Method 9 within 180 days after startup. The duration of the performance test must be three hours (30, 6-minute averages), except that the duration of the performance test may be reduced to one hour if both of the following conditions are met:

1. There are no individual readings greater than 10% opacity;

2. There are no more than three readings of 10% opacity for the first 1-hour period.

[40 C.F.R. § 63.7(a)(2), 63.1348(a)(2), and 63.1349(b)(2)]

C. Heidelberg shall demonstrate continuous compliance with the opacity standard in accordance with 40 C.F.R. § 63.1350(f). [40 C.F.R. § 63.1348(b)(3)]

1. Conduct a monthly 10-minute visible emission test of each affected source in accordance with 40 C.F.R. Part 60, Appendix A, Method 22. [40 C.F.R. § 63.1350(f)(1)(i)]

   a. If no visible emissions are observed in six consecutive monthly tests for any affected source, the frequency of performance testing may be reduced from monthly to semi-annually for that source. If visible emissions are observed during a semi-annual test, monthly testing must be resumed. [40 C.F.R. § 63.1350(f)(1)(ii)]

   b. If no visible emissions are observed during the semi-annual test for any affected source, the frequency of performance testing may be reduced from semi-annually to annually for that source. If visible emissions are observed during an annual test, monthly testing must be resumed. [40 C.F.R. § 63.1350(f)(1)(iii)]

   c. If visible emissions are observed during any Method 22 performance test, 30 minutes of opacity observations, recorded at 15 second intervals, must be conducted in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 within one hour of observing visible emissions. [40 C.F.R. § 63.1350(f)(1)(iv)]

   d. Method 22 visible emissions monitoring is not required for any totally enclosed conveying system transfer point. [40 C.F.R. § 63.1350(f)(1)(v)]

   e. Method 22 visible emissions monitoring of any partially enclosed or unenclosed conveying system transfer point located within a building shall be conducted for each such conveying system transfer point located within the building, or for the building itself. [40 C.F.R. § 63.1350(f)(1)(vi)]

   f. If visible emissions from a building are monitored, the requirements of this section apply to the monitoring of the building, and Heidelberg must

also test visible emissions from each side, roof, and vent of the building for at least 10 minutes. [40 C.F.R. § 63.1350(f)(1)(vii)]

2. If visible emissions are observed during any Method 22 visible emissions test, Heidelberg must initiate corrective action within one hour. [40 C.F.R. § 63.1350(f)(3)]

D. Heidelberg shall continue to comply with the reporting and recording requirements as specified in air emission license A-362-70-E-R/A (issued March 3, 2016) according to 40 C.F.R. §§ 63.1354 and 63.1355.

The following shall replace Condition (1) of NSR License A-326-77-10-A:

(4) **Backup Blower Engine**

A. Heidelberg shall keep records of all maintenance conducted on the Backup Blower Engine. [06-096 C.M.R. ch. 115, BACT]

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

Unit	PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Backup Blower Engine	0.12	0.12	0.12	0.01	4.41	0.95	0.35

C. Visible Emissions

Visible emissions from the Backup Blower Engine shall not exceed 20% opacity on a six-minute block average basis. [06-096 C.M.R. ch. 101, § 4(A)(4)]

D. The Backup Blower Engine shall meet the applicable requirements of 40 C.F.R. Part 60, Subpart IIII, including the following:
[incorporated under 06-096 C.M.R. ch. 115, BACT]

1. Manufacturer Certification
The engine shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in § 60.4202. [40 C.F.R. § 60.4205(b)]

2. Ultra-Low Sulfur Fuel
The fuel fired in the engine shall not exceed 15 ppm sulfur (0.0015% sulfur). Compliance with the fuel sulfur content limit shall be demonstrated by fuel delivery receipts from the supplier, fuel supplier certification, certificate of

analysis, or testing of the fuel in the tank on-site. [40 C.F.R. § 60.4207(b) and 06-096 C.M.R. ch. 115, BPT]

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on the engine. [40 C.F.R. § 60.4209(a)]

4. Annual Time Limit for Maintenance and Testing

   a. As an emergency engine, the unit shall be limited to 100 hours/year for maintenance checks and readiness testing. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity). These limits are based on a calendar year. Compliance shall be demonstrated by records (electronic or written log) of all engine operating hours. [40 C.F.R. § 60.4211(f) and 06-096 C.M.R. ch. 115, BPT]

   b. Heidelberg shall keep records that include the hours of operation of the engine recorded through the non-resettable hour meter. Documentation shall include the number of hours the unit operated for emergency purposes, the number of hours the unit operated for non-emergency purposes, and the reason the engine was in operation during each time. [40 C.F.R. § 60.4214(b)]

5. Operation and Maintenance
   The engine shall be operated and maintained according to the manufacturer's emission-related written instructions. Heidelberg may only change those emission-related settings that are permitted by the manufacturer. [40 C.F.R. § 60.4211(a)]

   Heidelberg shall have available for review by the Department a copy of the manufacturer's emission-related written instructions for engine operation and maintenance. [06-096 C.M.R. ch. 115, BACT]

(5) **Part 70 License Incorporation**

Heidelberg shall submit an application to incorporate this NSR license into the facility's Part 70 air emission license no later than 12 months from commencement of the requested operation. [06-096 C.M.R. ch. 140 § 1(C)(8)]

Done and Dated in Augusta, Maine this 30th day of OCTOBER, 2026.

Department of Environmental Protection

BY: _____
for Melanie Loyzim, Commissioner

Please note attached sheet for guidance on appeal procedures.

Date of initial receipt of application: November 24, 2025, and January 2, 2026
Date of application acceptance: December 5, 2025, and January 21, 2026

This Order prepared by Benjamin Goundie, Bureau of Air Quality.