



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Martin O'Malley
Governor

Anthony G. Brown
Lieutenant Governor

Robert M. Summers, Ph.D.
Acting Secretary

Subject: Emission Certification Due April 1, 2011

For the 2010 calendar year, ARMA is requiring that all Title V facilities report emissions of hazardous air pollutants (HAPS) from all registered equipment including fuel burning sources. These emissions will be due on April 1, 2011, along with the rest of the certified emissions.

Emissions must be reported for all HAPS listed in Section 112(b) of the Clean Air Act, excluding those removed by 40 CFR 63.60 and those emitted below the Department's minimum reporting thresholds. A link containing the reporting thresholds for 192 pollutants is posted on the Department's website.
www.mde.state.md.us/programs/Air/AirQualityCompliance/Pages/Programs/AirPrograms/air_compliance/index.aspx

As you may be aware the EPA is under court order to finalize the proposed Boiler MACT rule by early 2011. The provisions of this proposed rule require the Department to accurately differentiate between major and area sources of hazardous air pollutants (HAPS). Facilities that emit more than 10 tons per year of any particular HAP or more than 25 tons per year of all HAPS combined are considered major sources. Facilities that emit less than the above standards are considered area sources. The specific details of the proposed Boiler MACT can be found in the Federal Register (75 FR 31895 and 75 FR 32005).

As facilities that require a permit to operate, Title V facilities are required by COMAR 26.11.02.19D to submit actual emissions of *regulated air pollutants* on an annual basis. COMAR 26.11.02.01(44)(e) defines *regulated pollutant* to include all HAPS listed under section 112 of the Clean Air Act.

HAPS are to be reported on Form 4 and Form 5 as follows:

Form 4: Toxic Air pollutants – a separate copy of this form is to be used to report emissions of each toxic air pollutant

Form 5: Billable Toxic Air Pollutants – this form is to be used to report emissions of eleven toxic air pollutants that are not already billable as criteria pollutants. These eleven toxic air pollutants are already listed on the form. Please note that these eleven pollutants should also be included on Form 4.



Calculations supporting the emissions numbers reported on the certification forms must be included with your submittal. If AP-42 factors are used to determine emissions, please make sure that the most recent factors are used. AP-42 factors can be found at www.epa.gov/ttn.chief. Records such as production logs, purchase orders, and fuel bills that substantiate the numbers used in the calculations should be maintained on site and made available to ARMA inspectors upon request.

Should you have any questions or requires assistance completing this certification, please call your ARMA inspector at 410-537-3231.

Sincerely,

Ralph Hall

Ralph Hall,
Air Quality Compliance Program

