



AIR AND RADIATION ADMINISTRATION DRAFT PART 70 OPERATING PERMIT

DOCKET # 24-510-0314

COMPANY: **AMERICAN SUGAR REFINING, INC.**

LOCATION: 1100 KEY HIGHWAY EAST
BALTIMORE, MD 21230

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**MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
AIR QUALITY PERMITS PROGRAM**

TITLE V – PART 70 OPERATING PERMIT PROGRAM OVERVIEW

Title V of the Clean Air Act (amended) requires each state to implement a federally enforceable operating permit program for major sources of air pollution. This program, the Part 70 Permit Program, also known as the Title V Permit Program, is designed to provide a comprehensive administrative document (a Part 70 Operating Permit) that identifies all air emissions sources at a given facility and the federal air quality regulations applicable to those sources. The permit establishes the methodology by which the owner/operator will demonstrate compliance, and includes testing, monitoring, record-keeping, and reporting requirements for each emissions source.

A Part 70 Operating Permit does not authorize new construction, and does not add any new emissions limitations, standards, or work practices on an affected facility. There may, however, be additional testing, record keeping, monitoring, and reporting requirements. A Part 70 Operating Permit is a five-year renewable permit. A responsible official for each facility subject to a Part 70 Operating Permit is required to annually certify compliance with each applicable requirement for that facility.

When an application for a Part 70 Operating Permit is received, the Department will complete a technical review of the application and will prepare a draft Part 70 Operating Permit and Fact Sheet. The Fact Sheet will explain the basis and technical analysis used by the Department to develop the federally enforceable permit conditions, including the required testing, monitoring, record keeping, and reporting provisions for each emissions unit at the permitted facility. The Fact Sheet will also include a description of the facility operations and the current compliance status with applicable requirements. If there are any discrepancies between the Part 70 Operating Permit application and the draft permit, the Fact Sheet will contain a discussion of the inconsistencies and the final resolution.

Public Participation Process

The Part 70 Operating Permit Program provides the public, adjacent states, and EPA the opportunity to review and submit comments on draft permits. The public may also request a public hearing on the draft permit.

The purpose of a public hearing is to give interested parties the opportunity to submit comments for the record which are germane to the draft federally enforceable permit conditions. Comments made at the hearing, or in writing to the Department during the comment period, should address errors and deficiencies in the permit such as unidentified emissions units, incorrect or deficient regulation citation, deficient record keeping, monitoring, reporting or testing requirements and unresolved compliance issues. After the public comment period has closed, the Department will review the formal testimony as part of the final review and prepare a Response to Comments document which will be sent to the EPA along with the draft Part 70 Operating Permit and Fact Sheet.

Testimony on state-only requirements will be kept on file at the Department as part of the formal record, however, state-only rules and regulations are not federally enforceable, and therefore are not within the scope of the EPA review. The Department will keep a record of the identity of the commenters, their statements, a summary of the issues raised during the public comment period, and the Response to Comments document for at least five years.

Citizen Petition to EPA to Object to Permit Issuance

Interested parties may petition the EPA to object to the Part 70 Permit if the EPA has not already objected, within 60 days after the 45-day EPA review period has ended. The petition period will be posted on the EPA website. The EPA will only consider objections to the federally enforceable provisions of the draft permit which were raised with reasonable specificity during the public comment period, unless: (1) the petitioner demonstrates that it was impractical to raise the objections within the public comment period, or (2) the grounds for the objection arose after the comment period. If the EPA agrees with the petition, the Department will reopen, revise, or revoke the permit as determined.

Applicant Objection to Permit Issuance and Recourse

If the applicant objects to the federally enforceable permit conditions contained in the issued Part 70 Operating Permit, the applicant has 15 days from receipt of the issued permit to request a contested case hearing. More information on that can be found in 40 CFR, Part 70, and COMAR 26.11.03.11.

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION**

**NOTICE OF INTENT TO ISSUE PART 70 OPERATING PERMIT, OPPORTUNITY TO SUBMIT WRITTEN
COMMENTS OR TO REQUEST A PUBLIC HEARING**

The Department of the Environment, Air and Radiation Administration (ARA) has completed its review of the application for a renewal Part 70 Operating Permit submitted by the American Sugar Refining, Inc. located in Baltimore, MD. The facility consists a centralized steam and electrical cogeneration plant consisting of four (4) boilers (130 million Btu/hr. each) which fire natural gas and that fire fuel oil (No. 2 or No. 6) in curtailment and testing situations, and one (1) boiler which will be rated at 300 million Btu/hr that burns natural gas only.

The applicant is represented by:

Mr. Bruce Peters, Director
NA Manufacturing
American Sugar Refining, Inc
1 Federal Street
Yonkers, NY 10705

The Department has prepared a draft Part 70 Operating Permit for review and is now ready to receive public comment. A docket containing the application, draft permit, and supporting documentation is available for review on the Department's website, under the Air Quality Permitting Page's Title V link under "Draft Title V Permits" and may be viewed here:

<https://tinyurl.com/DraftTitleV>

Interested persons may submit written comments or request a public hearing on the draft permit. Written comments must be received by the Department no later than 30 days from the date of this notice. Requests for a public hearing must be submitted in writing and must also be received by the Department no later than 30 days from the date of this notice.

Comments and requests for a public hearing will be accepted by the Department if they raise issues of law or material fact regarding applicable requirements of Title V of the Clean Air Act, and/or regulations implementing the Title V Program in Maryland found in COMAR.

A Request for public hearing shall include the following:

- 1) The name, mailing address, and telephone number of the person making the request;
- 2) The names and addresses of any other persons for whom the person making the request if representing; and
- 3) The reason why a hearing is requested, including the air quality concern that forms the basis for the request and how this concern relates to the person making the request.

All written comments and requests for a public hearing should be directed to the attention of Ms. Shannon Heafey via email at Shannon.heafey@maryland.gov or by post at Air Quality Permits Program, Air and Radiation Administration, 1800 Washington Boulevard Suite 720, Baltimore, Maryland 21230-1720. Further information may be obtained by calling Ms. Shannon Heafey at (410) 537-4433.

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DRAFT PART 70 OPERATING PERMIT FACT SHEET

BACKGROUND

American Sugar Refining, Inc. (ASR) operates a sugar manufacturing plant which produces granulated and confectioner's sugars from raw cane sugar in bulk quantities and in various package sizes. The facility also manufactures bulk quantities of liquid cane sugars and syrups for industrial consumption. The sugar manufacturing process consists of two principal processes: decolorization and sugar production. The facility also operates a centralized steam and electrical cogeneration energy production facility (powerhouse). There are four (4) boilers (130 million Btu/hr. each) which fire natural gas and that fire fuel oil (No. 2 or No. 6) in curtailment and testing situations. There is also one (1) boiler which will be rated at 300 million Btu/hr that burns natural gas only.

The sugar manufacturing plant is located at 1100 Key Highway East in Baltimore, Maryland. The primary SIC code for this facility is 2062, sugar cane refining.

The following table summarizes the actual emissions from American Sugar Refining, Inc. based on its Annual Emission Certification Reports:

Table 1: Actual Emissions

Year	NO _x (TPY)	SO _x (TPY)	PM ₁₀ /PM _{2.5} (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2022	65.3	0.63	25.2/	85.9	8.6	0.059
2021	46.25	0.89	25.15/4.99	76.18	9.65	0.047
2020	135.13	0.85	31.77/8.31	104.17	12.64	0.13
2019	68.83	0.75	28.87/6.35	84.12	10.60	0.00539
2018	49.81	0.78	28.20/5.79	78.70	9.26	0.00523

The major source threshold for triggering Title V permitting requirements in Baltimore City is 25-tons per year for VOC, 25-tons for NO_x, and 100 tons per year for any other criteria pollutants and 10-tons for a single HAP or 25-tons per year for total HAPs. Since the actual NO_x and PM₁₀ emission from the facility are greater than the major source threshold, American Sugar Refining Inc. is required to obtain a Title V – Part 70 Operating Permit under COMAR 26.11.03.01.

The Department received the American Sugar Refining, Inc's Part 70-permit renewal application on November 1, 2022. An administrative completeness review was conducted, and the application was deemed complete. A completeness determination letter was sent to American Sugar Refining, Inc on November 17, 2022, granting American Sugar Refining, Inc. an application shield.

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CHANGES AND MODIFICATIONS TO THE PART 70 OPERATING PERMIT

The following changes and/or modifications that have occurred since the previous permit was issued have been incorporated into the renewal Title V – Part 70 Operating Permit for American Sugar Refining, Inc.

Additions:

June 19, 2020: Permit to Construct (510-0314-8-0409) issued for Bulk Powdered Sugar Tote Packaging Line (S6-7J).

February 25, 2021: Permit to Construct (510-0314-8-0410 & 8-0411) issued for Four (4) new sugar storage silos (S1-S4) and associated equipment (BV-1 through BV-4, BE-1, AC-2A, AC-2B, AC-9) controlled by a Schenck dust collector (DV-1). This project is fully operational as of September 1, 2023.

April 9, 2021: Permit to Construct (510-0314-8-0225 and 8-0296) issued for Modification to the existing 10X Filler System (S6-7I).

August 5, 2021: Permit to Construct (510-0314-6-3091) issued for Old Sugar Shed Conveyance System to/from Storage Barge.

A few control device references were incorrectly identified in the 2018 permit renewal. The following changes reflect the proper equipment:

- Scrap Melter 1 (S5-1) is controlled by a Rotoclone (RP-C-1) not RP-C10.
- Packaging system (S7-10) is controlled by a Wheelabrator dust collector (7-5-1)(RP-C-32) not RP-C-30.
- The “Super-Sack” Packaging Line (S7-11) is controlled by a Wheelabrator dust collector (7-5-2)(RP-C-30) not 7-5-1.

Removal

Replacement of 100-kW emergency generator with a 250-kW emergency generator (U11-2). No permit to construct required because it is less than 500-bhp (373-kW). Listed in insignificant activity list. An Administrative Amendment was submitted, and Administrative Completeness was issued April 23, 2020.

Removal of sources due to the fire in 2021 at the Raw Sugar Shed. The following equipment was destroyed and is no longer in operation: Raw Sugar Shed (R29-2), Conveyors R2B-6 and RSB-9, and Shuttle RSS-3. An Administrative Amendment was submitted, and Administrative Completeness was issued April 30, 2021.

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NSPS and MACT

American Sugar Refining, Inc is subject to the NSPS (40 CFR Part 60)

- Subpart Db- Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units: **(C6)**: Boiler 6 – 300-MMBtu/hr. natural gas fired boiler. (MDE Reg. 5-1476)
- Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. (U11-2): 250-kW emergency generator.

American Sugar Refining, Inc is not a major HAP Emissions Source. Instead, it is an area HAP emission source and is subject to the following MACT (40 CFR Part 63):

- Subpart ZZZZ—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions. (U11-2): 250-kW emergency generator. Compliance with NSPS requirements meets the NESHAP requirements.

COMPLIANCE ASSURANCE MONITORING

American Sugar Refining, Inc. conducted a Compliance Assurance Monitoring (CAM) analysis for the facility and determined that the facility is not subject to the (CAM) Rule 40 CFR Subpart 64. CAM is intended to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act for large emission units that rely on air pollution control (APC) equipment to achieve compliance. The CAM approach establishes monitoring for the purpose of: (1) documenting continued operation of the control measures within ranges of specified indicators of performance (such as emissions, control device parameters, and process parameters) that are designed to provide a reasonable assurance of compliance with applicable requirements; (2) indicating any excursions from these ranges; and (3) responding to the data so that the cause or causes of the excursions are corrected. In order for a unit to be subject to CAM, the unit must be located at a major source, be subject to an emission limitation or standard; use a control device to achieve compliance; have post-control emissions of at least 100% of the major source amount (for initial CAM submittals); and must not otherwise be exempt from CAM. Applicability determinations are made on a pollutant-by-pollutant basis for each emission unit.

Emissions units at the refinery do not use “control devices” (as defined in 40 CFR Part 64) to meet emission limits or standards. The refinery baghouses, cyclones, dust collectors, and venture scrubbers/rotoclones are “inherent process equipment” as defined. Thus, the refinery does not have pre-control device emissions and is not subject to the applicability criteria of 40 CFR Part 64.2(a)(3) and 64.5(A).

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GREENHOUSE GAS (GHG) EMISSIONS

American Sugar Refining, Inc. emits the following greenhouse gases (GHGs) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHGs originate from various processes (i.e., internal combustion engines, and boilers) contained within the facility premises applicable to ASR Inc. The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements. While there may be no applicable requirements as a result of PSD, emission certifications reports showed that ASR, Inc exceeded the major source (threshold: 100,000tpy CO_{2e}) for GHG's (see Table 3 shown below). The Permittee shall quantify facility wide GHGs emissions and report them in accordance with Section 3 of the Part 70 permit.

The following table summarizes the actual emissions from American Sugar Refining, Inc. based on its Annual Emission Certification Reports:

Table 2: Greenhouse Gases Emissions Summary

GHG	Conversion factor	2020 tpy CO_{2e}	2021 tpy CO_{2e}	2022 tpy CO_{2e}
Carbon dioxide CO ₂	1	119,734.98	108,001	122,262.40
Methane CH ₄	25	2.394	2.038	2.30
Nitrous Oxide N ₂ O	298	0.219	0.204	0.230
Total GHG CO _{2eq}		119,737.59	108,003.80	122,264.93

EMISSION UNIT IDENTIFICATION

American Sugar Refining, Inc. has identified the following emission units as being subject to Title V permitting requirements and having applicable requirements.

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Table 3: Emission Unit Identification

Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
C1 thru C4	5-1444 thru 5-1447	Four (4) Combustion Engineering Boilers, each rated at 130 million Btu/hr. firing natural gas and No. 2 fuel oil. Boilers 1 thru 4.	1966; Modified 6/12/2012
C6	5-1476	One (1) Babcock & Wilcox boiler rated at 300 million Btu/hr. firing natural gas and equipped with a low-NO _x burner and flue gas recirculation.	July 2000; Modified 1/18/2013 and 2018
R29-1	6-3091	Raw Sugar Unloading and Conveying. Modified 2021: additional equipment for transfer of raw sugar – Old Sugar Shed Conveyance system to/from Storage Barge. [PTC issued Aug 5, 2021]	Aug 2021
R29-3	N/A	Melter Feed	1971
R29-4	N/A	Diatomite Fugitives	1971
S7B-2	8-0212	Bin Tower Rejects Box	1966
S7-12	8-0266	Maltodex Supersak Unloading System	1982
S7-13	N/A	Remelt Shredder Fugitives	1989
S7-14	8-0223	Magnets Tailing Fugitives	1966
D28-1	8-0301	Carbonatation Process – Lime silo equipped with a baghouse	1995
D10-1, 2, 3		Carbonatation Process – Saturators demisters (RP-C-1, -2, -3, respectively) and controlled by a Ducon Flue Gas Scrubber.	1995
D2-1	8-0301	Mud Loading	1964
D3-5	N/A	Char Filtration Process – Celite Fugitives	
U5-1	8-0383	Cooling Tower CT-3	Unknown
S5-1	8-0226	Scrap melter equipped with a Rotoclone scrubber (RP-C-1)	1922
S5-2	8-0382	Scrap melter	1991
S5-3		Remelt Screw Conveyors	1991
S5-4	6-2022	Invert System with a Rotoclone [S5-4A: Invert Cloudy Tank; S5-4B: Invert Precoat Tank; S5-4C: Surcose Cloudy Tank; S5-4D: Surcose Precoat Tank; S5-4E: Clear Surcose Tank; S5-4F: Clear Invert Tank]	1958
S5-5		Caustic fugitives associated with the invert System	1958
S5-6	6-2020	Soft Sugar Shredder	1969

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Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
S5-8A-B	8-0332	Two (2) Dryers (Powdered Specialty Sugars) each equipped with venturi scrubbers (DW-1) (RP-C-33), DW-2 (RP-C-34), respectively.	Feb 2004
S5-8D		Liquid Sugar Cooler (Powdered Specialty Sugars) controlled by Sly Venturi Scrubber (WS-1) (RP-C-35).	Feb 2004
S5-8E		Three (3) Centrifugal Separators controlled by Sly Venturi Scrubber (WS-1) (RP-C-36)	Feb 2004
S5-8F		Washout Tanks and Beater controlled by a Rotoclone.	Feb 2004
S5-8G		Packaging and Conveying Equipment controlled by Sly Venturi Scrubber (WS-1) (RP-C-36)	Feb 2004
S1-1	8-0320	FEECO Rotary sugar dryer equipped with Entoleter vortex scrubber (RP-C-15)	1999
S7A-1	8-0212	Bulk Sugar Conveying System controlled by a scrubber (RP-C-25) [S7A-RE1: Bucket Elevator RE-1; S7A-XE1: Bucket Elevator XE-1; S7A-XRS1: Bucket Elevator XRS-1; S7A-UE1: Bucket Elevator UE-1; S7A-UE2A: Bucket Elevator UE-2A; S7A-UE2B: Bucket Elevator UE-2B; S7A-RE2: Bucket Elevator RE-2; S7A-U1: Storage Bin U1; S7A-U2: Storage Bin U2; S7A-U3: Storage Bin U3; S7A-U4: Storage Bin U4; S7A-U5: Storage Bin U5; S7A-U6: Storage Bin U6; S7A-XF1: Storage Bin XF-1; S7A-XF2: Storage Bin XF-2; S7A-V1: Storage Bin V1; S7A-V2: Storage Bin V2; S7A-V3: Storage Bin V3; S7A-V4: Storage Bin V4; S7A-V5: Storage Bin V5; S7A-V6: Storage Bin V6; S7A-C1: Storage Bin C1; S7A-F1: Storage Bin F1; S7A-AR1: Storage Bin AR1; S7A-AR2: Storage Bin AR2; S7A-AR3: Storage Bin AR3; S7A-AR4: Storage Bin AR4;	1966

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Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
		S7A-AR5: Storage Bin AR5; S7A-AR6: Storage Bin AR6; S7A-AR7: Storage Bin AR7; S7A-AR8: Storage Bin AR8; S7A-RJX: Screw Conveyor Rejects.	
S7-5, S7-6, S7-7	8-0265	Packaging Feed Tanks each equipped with a filter (RP-C-26, -27, & -28, respectively)	Jan 2001
S7-8		Packaging Operations controlled by Rotoclon 7-6-1 (RP-C-29) [S7-8A: Fawema Packaging System; S7-8B: Paxall Packaging System; S7-8C: Clouds Packaging System; S7-8D: Handi Pak System]	Jan 2001
S7-10		Packaging System controlled by a Wheelabrator dust collector (7-5-1) (RP-C-32) [S7-10A: Hesser Bagging System; S7-10B: Supersack Unloading System]	Jan 2001
S7B-1	8-0223	Bulk Loading System with an Entoleter scrubber (RP-C-31) and DCL UN800 Dust Collectors	1966; Modified Feb 2016
S7-11	8-0287	Supersack Sugar Packing Line controlled by Wheelabrator dust collectors. [S7-11A: Thiele Supersack system; S7-11B: Tub Packaging Line controlled by Wheelabrator 7-5-2 (RP-C-30); S7-11C: Simplex Packaging Line controlled by a Wheelabrator dust collector 6-5-1 (RP-C-12)]	1990
S6-4	8-0115	BMA Granulator equipped with Rotoclon (RP-C-11)	1969
S6-5	8-0225	Sugar Packaging Line and Conveying System controlled by a Wheelabrator dry filter (6-5-1) (RP-C-12) [S6-5A: Remelt Shredder; S6-5B: Maltrin Tank; S6-5C: Sugar Tank; S6-5D: MFB Feeder; S6-5E-G: 3 Sugar Feed to Mills 1, 2, & 3; S6-5H: 6-5-1200 Receiver; S6-5I: UB-1 South Hood; S6-5J: UB-1 Tail End]	Nov 2008; Modified Apr 2021
S6-6	8-0115	Sugar Packaging Line and Conveying System controlled by a Wheelabrator dry filter (6-5-2) (RP-C-13)	Nov 2008

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Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
		[S6-6A: Oscillator; S6-6B: DSE-1; S6-6C: US-2 Scroll; S6-6D: UB-1 North]	
S6-7	8-0296 / 8-0409	Sugar Packaging Line and Conveying System controlled by a Wheelabrator dry filter (6-5-3) (RP-C-14) [S6-7A: Receiver 1300 2#; S6-7B: Old V-Bag Packaging System; S6-7C: Receiver 1250; S6-7D: Receiver 6-4-1300; S6-7E: 2# Poly Filler System; S6-7F: New V.B. Filler System; S6-7G: Old V.B Filler System; S6-7H: Packet Grinder; S6-7I: 1-4 10X Filler System; S6-7J: Bulkline (Supersack) Packaging Line – June 2020 – MDE Reg. 510-0314-8-0409]	Nov 2008 / Jun 2020; Modified Apr. 2021
S6-1	8-0209	Sugar Mill 1 equipped with MAC dry filer (RP-C-16)	Nov 2008
S6-1A		Starch Receiver 1 equipped with dry filer (RP-C-17)	Nov 2008
S6-2		Sugar Mill 2 equipped with MAC dry filer (RP-C-18)	Nov 2008
S6-2A		Starch Receiver 2 equipped with dry filer (RP-C-19)	Nov 2008
S6-3	8-0125	Sugar Mill 3 equipped with MAC dry filer (RP-C-20)	Nov 2008
S6-3A		Starch Receiver 3 equipped with dry filer (RP-C-21)	Nov 2008
S6-8	8-0266	Sugar Pulverizer (Mill 7) equipped with Mikropul baghouse (RP-C-24)	1988
S6-9	8-0209	Starch Bin equipped with vent filter (RP-C-22)	Nov 2008
S5-7	6-2021	Ten (10) Evaporation Pans (#1-9, 11)	1950
S7-15	6-2018	Packaging Video Inkjet Printers	1990
S7-16	9-1298	Packaging Adhesives Fugitives: additional adhesive (H.B. Fuller – Swift@Tak 5948-00) for substitution of original adhesives.	1990; Mod. 2022
D3-6	8-0386	Ion Exchange System: Scrubber (25-gpm once-through)	2013
D3-6A		HCl Tank (8,450-gallons) equipped with scrubber D3-6	
D3-7		Resin Acid Wash Tank (12,924-gallons)	

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Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
D3-8		Clean in Place (CIP) Tank (734-gallons)	
D3-9A, B, C, D		Four (4) Deashing Resin Beds (10,574-gallon, each)	
D3-10A, B, C, D		Four (4) Decolorized Resin Beds (23,603-gallons, each)	
D3-11A, B		Two (2) Salt saturators controlled by water spray chamber (D3-11)	
D3-12		HCl equipment leak components (valves, pumps, connectors)	
U11-2	9-1293	250-kW Emergency Generator	2020
S1, S2, S3 & S4	8-0411	Four (4) 3.75-million-pound sugar storage silos equipped with bin vents (BV-1, BV-2, BV-3, BV-4) [PTC issued Feb 25, 2021]	2021

AN OVERVIEW OF THE PART 70 PERMIT

The Fact Sheet is an informational document. If there are any discrepancies between the Fact Sheet and the Part 70 permit, the Part 70 permit is the enforceable document.

Section I of the Part 70 Permit contains a brief description of the facility and an inventory list of the emissions units for which applicable requirements are identified in Section IV of the permit.

Section II of the Part 70 Permit contains the general requirements that relate to administrative permit actions. This section includes the procedures for renewing, amending, reopening, and transferring permits, the relationship to permits to construct and approvals, and the general duty to provide information and to comply with all applicable requirements.

Section III of the Part 70 Permit contains the general requirements for testing, record keeping and reporting; and requirements that affect the facility as a whole, such as open burning, air pollution episodes, particulate matter from construction and demolition activities, asbestos provisions, ozone depleting substance provisions, general conformity, and acid rain permit. This section includes the requirement to report excess emissions and deviations, to submit an annual emissions certification report and an annual compliance certification report, and results of sampling and testing.

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Section IV of the Part 70 Permit identifies the emissions standards, emissions limitations, operational limitations, and work practices applicable to each emissions unit located at the facility. For each standard, limitation, and work practice, the permit identifies the basis upon which the Permittee will demonstrate compliance. The basis will include testing, monitoring, record keeping, and reporting requirements. The demonstration may include one or more of these methods.

Section V of the Part 70 Permit contains a list of insignificant activities. These activities emit very small quantities of regulated air pollutants and do not require a permit to construct or registration with the Department. For insignificant activities that are subject to a requirement under the Clean Air Act, the requirement is listed under the activity.

Section VI of the Part 70 Permit contains State-only enforceable requirements. Section VI identifies requirements that are not based on the Clean Air Act, but solely on Maryland air pollution regulations. These requirements generally relate to the prevention of nuisances and implementation of Maryland's Air Toxics Program.

REGULATORY REVIEW/TECHNICAL REVIEW/COMPLIANCE
METHODOLOGY

Emission Unit: C1 thru C4

Fuel Burning Equipment

C1 thru C4: Four (4) Combustion Engineering Boilers each rated at 130 MMBtu/hr. firing natural gas and fuel oil (No. 2 or No. 6) (only during periods of natural gas curtailment), and each equipped with an ultra-low NO_x burner. [MDE Reg. Nos. 510-0314-5-1444, 5-1445, 5-1446, and 5-1447].

Background

ASR, Inc. negotiated a District Court Consent Decree with EPA Region III involving the operation of ASR's steam boilers. The District Court Consent Decree was signed and entered into the court docket July 2, 2012. The District Court Consent Decree required ASR to do the following:

- Install ultra-low NO_x burners (ULNB) and continuous emissions monitoring systems (CEMS) on Boilers 2 & 4 and commence operation thereof by September 1, 2012.
- Install ULNB and CEMS on Boilers 1 & 3 and commence operation thereof by February 28, 2013.
- Install ULNB and CEMS on Boiler 6 and commence operation thereof by April 1, 2013.

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Note: Per the District Court Order Modifying Consent Decree dated August 5, 2013, the letter from ASR to the EPA dated March 14, 2014, and the response from the EPA dated April 2, 2014, the requirement to install a ULNB on Boiler 6 was removed.

- Restrict NO_x emissions from Boilers 1-4 & 6 to 624 lbs./day, on a 30-day rolling average, by the earlier of April 1, 2013, or the date on which ULNB are operational on Boilers 1-4 & 6 the time which all ULNBs are installed whichever comes first.

Note: Per the District Court Order Modifying Consent Decree dated August 5, 2013, this requirement was modified to include operating scenarios in which Boilers 1-4 and 6 must meet a NO_x emissions limit of 500 lbs./day.

- Restrict NO_x emissions from Boilers 1-4 & 6 to 62 tons during any consecutive 12-month period or 6.0 tons in any calendar month, beginning on April 1, 2013, or the time which all ULNBs are installed whichever comes first.

Note: Per the District Court Order Modifying Consent Decree dated August 5, 2013, the letter from ASR to the EPA dated March 14, 2014, and the response from the EPA dated April 2, 2014, this requirement was modified to limit ASR to NO_x emissions of 60 tons during any consecutive 12-month period.

- Restrict the combined hours of operation of Boilers 1-4 during any consecutive 12-month period to 20,220 hours, beginning 90 days following the effective date of the District Court Consent Decree, and
- Submit an application to MDE no later than 120 days after the establishment of emission limits pursuant to the District Court Consent Decree to incorporate the limit into a federally enforceable permit.

A permit to construct was issued June 12, 2012, for the addition of an Ultra-Low NO_x Burner (ULNB) to each of the four (4) boilers. The addition of these burners is mandated by a District Court Consent Decree with the EPA (Civil Action No. JBK-12-1048, dated May 7, 2012).

A Permit to Construct was issued on August 28, 2014, to incorporate the changes from the District Court Order Modifying Consent Decree dated August 5, 2013.

40 CFR 60, Subpart Db - Standards Of Performance For Industrial-Commercial-Institutional Steam Generating Units:

This regulation does not apply because the boilers were constructed prior to 1984 (40 CFR §60.40b(a)) and the change made to the boilers does not meet the definition of a modification found in 40 CFR §60.2. The definition of a modification indicates that the emissions must increase, or something must be emitted after the modification that was not emitted prior to the modification. The ultra-low NO_x burners will decrease NO_x emissions from these units without increasing any other regulated pollutants.

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40 CFR 63, Subpart DDDDD - National Emission Standards For Hazardous Air Pollutants For Industrial, Commercial, And Institutional Boilers And Process Heaters:

This regulation does not apply because the facility is not a major source of Hazardous Air Pollutants (40 CFR §63.7485).

40 CFR 63, Subpart JJJJJJ - National Emission Standards For Hazardous Air Pollutants For Industrial, Commercial, And Institutional Boilers Area Sources:

These boilers are exempt from this regulation because they burn natural gas with fuel oil (No. 2 or No. 6) only being burned during times of natural gas curtailment (40 CFR §63.11195(e)). Gas fired boilers are defined in 40 CFR §63.11237.

Compliance Status:

During the 2022 full compliance report, Boiler #3 was operating on natural gas. PM stack test was conducted on Boilers #1 & #3 on December 12, 2021, burning No. 2 fuel oil. Results showed PM emissions of 0.0014 gr/dscf (corrected to 50% excess air) which is in compliance with the emissions limit of 0.020 gr/dscf @50% EA. Method 9 VE conducted during the stack testing showed no visible emissions. PM stack test was conducted on Boilers #2 & #4, on March 31, 2021, burning No. 2 fuel oil. Results showed PM emissions of 0.0007 gr/dscf (corrected to 50% excess air) which is in compliance with the emissions limit of 0.020 gr/dscf @50% EA. Method 9 VE conducted during the stack testing showed no visible emissions.

EPA Consent Order Reporting Period (July 1, 2022 thru Dec 31, 2022) stated the following: **C1:** experienced a total downtime of 27 hours in the reporting period out of a total operating time of 2380 hours; **C2:** experienced a total downtime of 3 hours in the reporting period out of a total operating time of 1759 hours; **C3:** experienced a total downtime of 11 hours in the reporting period out of a total operating time of 2521 hours; **C4:** experienced a total downtime of 15 hours in the reporting period out of a total operating time of 3122 hours.

Applicable Standards/Limits:

A. Control of Visible Emissions

COMAR 26.11.09.05A - Visible Emissions.

(2) "Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.

(3) Exceptions. Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:

(a) The visible emissions are not greater than 40 percent opacity; and

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(b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period."

Compliance Demonstration

The Permittee shall conduct Method 9, 22 or equivalent method approved by the Department opacity observations for at least one hour during stack testing to demonstrate compliance with the no visible emissions requirement of COMAR 26.11.09.05A(2) when burning fuel oil (No. 2 or No. 6). **[Reference: COMAR 26.11.03.06C & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]**

The Permittee shall:

- (1) properly operate and maintain the boilers in a manner to prevent visible emissions; and
- (2) verify no visible emissions when burning fuel oil (No. 2 or No. 6). The Permittee shall perform a visual observation for a 6-minute once for each 168-hour period when the boiler burns fuel oil. If a boiler does not burn fuel oil for more than 100 hours in a calendar year, the visible emission observation requirement is waived for that boiler.
- (3) The Permittee shall perform the following if visible emissions are observed:
 - (a) inspect combustion system and boiler operation;
 - (b) perform all necessary adjustments and/or repairs to the boiler within 48 hours so that visible emissions are eliminated;
 - (c) document in writing the results of inspections, adjustments, and/or repair to the boiler; and
 - (d) after 48 hours, if required adjustments and/or repair had not eliminated the visible emissions, perform a Method 9 observation for an 18-minute period once per day until corrective actions have eliminated the visible emissions.

The Permittee shall:

- (1) maintain an operational manual and preventive maintenance plan on site;
- (2) maintain the test result of the Method 9 performed;
- (3) maintain records of the results of the monthly inspections;
- (4) maintain a record of the maintenance performed that relates to combustion performance;
- (5) maintain a log of visible emissions observations performed and make it available to the Department upon request;
- (6) maintain a record of the hours that fuel oil (No. 2 or No. 6) is burned.

[Reference: COMAR 26.11.03.06C].

The Permittee shall report, in accordance with requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Administration.

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B. Control of Particulate Matter

(1) **COMAR 26.11.09.06B(1)(a)** - Control of Particulate Matter - Areas III and IV – Dust Collector Devices Required. “A person may not cause or permit the combustion of residual fuel oil in fuel burning equipment unless the equipment is fitted with a dust collector which is so designed that it can reasonably be expected to produce sufficient dust particle force, residence time, and particle retention to satisfy the requirements of Table 1. This paragraph does not apply to fuel burning equipment where by-product gases or by-product gases in combination with residual fuel oil are burned and where the effluent gases do not contain particulate matter in excess of the requirements of Table 1, as applicable to residual oil burning.”

(2) **COMAR 26.11.09.06B(2)** - Control of Particulate Matter - Areas III and IV - Residual Fuel-Oil-Burning Equipment. “A person may **not** cause or permit particulate matter caused by the combustion of residual fuel oil to be discharged into the atmosphere in excess of the amounts shown in Table 1.”

(3) **COMAR 26.11.09.09:** Table 1 - Emission Standards and Dust Collector Performance Standards for Fuel-Burning Equipment.

Table 1 Emission Standards and Dust Collector Performance Standards for Fuel-Burning Equipment		
<i>Equipment Description</i>	<i>Max. Rated Heat Input in million Btu (gigajoules) per hour per furnace</i>	<i>Max. Allowable Emissions of Part. Matter – gr/scfd (mg/dscm)</i>
Existing and new equipment burning residual oil	Less than 13 (13.7) 13 – 50 (13.7 – 52.8) 50 – 250 (52.8 – 265)	No requirement (a) 0.03 (69) 0.020 (46)

(4) No. 6 fuel oil is limited to a maximum of **0.068% ash content.**
[Reference: MDE letter dated November 8, 2005 & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]

Compliance Demonstration

Stack emissions tests shall be conducted at least once every two-year period to demonstrate compliance with the 0.020 gr/scfd particulate matter emission limit when the boiler burns fuel oil (No. 2 or No. 6) with a pre-determined ash content weight percent. Stack emissions tests shall be conducted to demonstrate

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compliance with the 0.020 gr/scfd particulate matter emission limit can be achieved during either of the following operating conditions:

(1) Burning only fuel oil (No. 2 or No. 6) with a pre-determined ash content weight percent in boilers 1 thru 4; and burning the lowest possible ratio of natural gas to fuel oil (No. 2 or No. 6) in boilers #1 thru #4.

(2) Boilers #1 thru #4 shall each be operated at 90% or higher of their rated capacity during all stack emissions tests. **[Reference: COMAR 26.11.03.06C]**

Note: The Permittee is not required to conduct stack testing on Boilers #1 thru #4 when fuel oil (No. 2 or No. 6) has not been utilized at any time during the preceding two (2) years.

The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the fuel oil (No. 2 or No. 6) has an ash content equal to or less than 0.068% by weight. **[Reference: MDE letter dated November 8, 2005 & COMAR 26.11.03.06C]**

The Permittee shall:

(1) maintain records of all stack emissions test documents and (2) maintain the fuel supplier certification for each shipment of fuel oil (No. 2 or No. 6) stating the ash content in weight percent.

At least 30 days prior to the projected date of the stack emission test, the Permittee shall submit a test protocol to the Department for review and approval. Within 45 days after the emission test, the Permittee shall submit to the Department a stack test report that includes the stack emissions test results and opacity observations results. **[Reference: COMAR 26.11.03.06C]**

C. Control of Sulfur Oxides

(1) **COMAR 26.11.09.07A(2) - Sulfur Content Limitations for Fuel.**

"A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: (2) In Areas III and IV:

(a) *Not applicable.*

(b) Distillate fuel oils, 0.3 percent.

(c) Residual fuel oils, 1.0 percent."

(2) No. 6 fuel oil is limited to a maximum of 0.5% sulfur content.

[Reference: MDE letter dated November 8, 2005 & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

Compliance Demonstration.

(1) The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the No. 6 fuel oil has a sulfur content equal to or less than 0.5% by weight. **[Reference: MDE letter dated November 8, 2005 & COMAR 26.11.03.06C]**

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(2) The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the No. 2 fuel oil has a sulfur content equal to or less than 0.3% by weight. **[Reference: COMAR 26.11.03.06C]**

The Permittee shall maintain records of the annual fuel supplier certifications stating that the No. 6 fuel oil used in Boilers #1 thru #4 is in compliance with the 1.0% by weight sulfur limitation required by COMAR 26.11.09.07A(2)(c). **[Note: Per November 8, 2005, letter from MDE, based on stack testing data, sulfur content of fuel oil is not to exceed 0.5%]**

The Permittee shall maintain records of the annual fuel supplier certifications stating that the No. 2 fuel oil used in Boilers 1 thru 4 is in compliance with the 0.3% by weight sulfur limitation required by COMAR 26.11.09.07A(2)(b).

The Permittee shall maintain records of the certification from the supply company of all natural gas curtailment events, including date and duration of the event.

[Reference: MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]

The Permittee shall make records of certification from the supplier available to the Department upon request. **[Reference: COMAR 26.11.03.06C]**

D. Control of Nitrogen Oxides

(1) **COMAR 26.11.09.08B(1)(c)** - Control of NO_x for Major Stationary Sources – Emissions Standards and Requirements. “Emission Standards in Pounds of NO_x per Million Btu of heat input.”

Fuel	Tangential Fired	Wall-Fired
Gas only	0.20	0.20
Gas/Oil	0.25	0.25
Coal (dry bottom)	0.38	0.38
Coal (wet bottom)	1.00	1.00

(2) **COMAR 26.11.09.08B(5)** - Control of NO_x for Major Stationary Sources – Operator Training.

(a) “For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.

(b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department.”

(3) **COMAR 26.11.09.08D(1)(b)** - Requirements for Fuel-Burning Equipment with a Rated Heat Input Capacity of Less than 250 Million Btu Per Hour and Greater than 100 Million Btu Per Hour.

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“All other fuel burning equipment with a rated heat input capacity of less than 250 Million Btu per hour and greater than 100 Million Btu per hour shall meet the NO_x emission rates set forth in §B(1)(c) of this regulation.”

(4) No. 6 fuel oil is limited to a maximum of 0.5% nitrogen content.
[Reference: MDE letter dated November 8, 2005 & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]

Compliance Demonstration

(1) The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the oil has a nitrogen content equal to or less than 0.5% by weight. **[Reference: MDE letter dated November 8, 2005 & COMAR 26.11.03.06C]**

(2) At a point in each stack prior to a point at which boiler flue gas combines with flue gas from any other boiler, the Permittee shall install and make operational, concurrent with commencement of operations of the ultra-low NO_x burners, an NO_x continuous emissions monitoring system (CEMS) to monitor NO_x emissions in accordance with the requirements of 40 CFR Part 60. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(15) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]**

(3) The required CEMS shall monitor and record the applicable NO_x Emission Rate for each boiler to demonstrate compliance with the established NO_x Emissions Rates and shall be continuously operated, except during CEMS breakdowns, repairs, calibration checks, and zero span adjustments.
[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(16) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]

(4) If the Permittee is unable to obtain emissions data from the CEMS because of a malfunction of the CEM for more than 2 hours in duration, the Permittee shall use the alternative measurement method approved by the Department and EPA.
[Reference: COMAR 26.11.01.11B(4) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]

(5) A CEMS used to monitor a gas concentration shall record not less than four equally spaced data points per hour and automatically reduce data in terms of averaging times consistent with the applicable emission standard per COMAR 26.11.01.11D. **[Reference: MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]**

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(6) All emissions of NO_x shall be measured by the CEMS. During any periods of time when any CEMS is inoperable or not measuring NO_x emissions from any boiler, the Permittee shall apply the missing data substitution procedures provided in 40 CFR Part 75, Subpart D. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(18) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]**

(7) **COMAR 26.11.01.11C – Quality Assurance for CEMS**. "A CEM used to monitor a gas concentration shall meet the quality assurance criteria of 40 CFR Part 60, Appendix F, as amended, which is incorporated by reference, or, if applicable, the quality assurance criteria of 40 CFR Part 75, Appendix B, as amended."

The Permittee shall maintain records of the following and make available to the Department upon request:

(1) The fuel supplier certification for each shipment of fuel oil (No. 2 or No. 6) stating the nitrogen content in weight percent.

(2) All training and combustion analysis records required by COMAR 26.11.09.08B(5).

[Reference: COMAR 26.11.03.06C]

(1) The Permittee shall submit a record of training program attendance for each operator to the Department upon request.

(2) The Permittee shall comply with the CEM System Downtime Reporting Requirements of COMAR 26.11.01.11E as follows:

(a) All CEM system downtime that lasts or is expected to last more than 24 hours shall be reported to the Department by telephone before 10 a.m. of the first regular business day following the breakdown.

(b) The system breakdown report required by §E(1)(a) of this regulation shall include the reason, if known, for the breakdown and the estimated period of time that the CEM will be down. The owner or operator of the CEM shall notify the Department by telephone when an out-of-service CEM is back in operation and producing data that has met performance specifications for accuracy, reliability, and durability of acceptable monitoring systems, as provided in COMAR 26.11.31, and is producing data.

(3) The Permittee shall comply with the CEM Data Reporting Requirements of COMAR 26.11.01.11E as follows:

(a) All test results shall be reported in a format approved by the Department.

(b) Certification testing shall be repeated when the Department determines that the CEM data may not meet performance specifications because of component replacement or other conditions that affect the quality of generated data.

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(c) A quarterly summary report shall be submitted to the Department not later than 30 days following each calendar quarter. The report shall be in a format approved by the Department, and shall include the following:

- (i) The cause, time periods, and magnitude of all emissions which exceed the applicable emission standards;
- (ii) The source downtime including the time and date of the beginning and end of each downtime period and whether the source downtime was planned or unplanned;
- (iii) The time periods and cause of all CEM downtime including records of any repairs, adjustments, or maintenance that may affect the ability of the CEM to meet performance specifications of emission data;
- (iv) Quarterly totals of excess emissions, installation downtime, and CEM downtime during the calendar quarter;
- (v) Quarterly quality assurance activities;
- (vi) Daily calibration activities that include reference values, actual values, absolute or percent of span differences, and drift status; and
- (vii) Other information required by the Department that is determined to be necessary to evaluate the data, to ensure that compliance is achieved, or to determine the applicability of this regulation.

(d) All information required by this regulation to be reported to the Department shall be retained and made available for review by the Department for a minimum of 2 years from the time the report is submitted.”

(4) The Permittee must report orally or by electronic or facsimile transmission to the U.S. EPA and MDE, no later than 24 hours after the Permittee knew or should have known of any violation of the District Court Consent Decree, any permit regulations, or any event that may pose an immediate threat to the public health or welfare or the environment.

(5) The Permittee shall submit within 30 days following each January 1st and July 1st a semi-annual report to the U.S. EPA for the immediately preceding half-calendar year period. This report shall:

- (a) Identify any and all dates on which the Permittee has installed, or describe the progress of installation of, each ultra-low NO_x burner required for NO_x control, emission limits, CEMS, and monitoring requirements, and describe any problems encountered or anticipated during such installation, together with implemented or proposed solutions;
- (b) Provide all CEMS data collected for each Boiler #1 through #4 including an explanation of any periods of CEMS downtime together with any missing data for which American Sugar applied missing data substitution procedures, under Section VI.B of the Consent Order.
- (c) Demonstrate compliance with all applicable 30-day rolling average emission limits in Section V of the District Court Consent Decree.

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(d) Describe the status of any operation and maintenance work relating to activities required under the District Court Consent Decree.

[Reference: MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]

E. Operational Limitations

(1) The Permittee shall operate the boilers such that the combined hours of operation for Boilers #1 through #4 do not exceed 20,220 hours in any consecutive 12-month period. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(12) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]**

(2) In accordance with COMAR 26.11.09.06B(2), particulate matter emissions from the stack services Boilers #1 through #4 shall not exceed 0.020 grains per SCFD (corrected to 50% excess oxygen). **[Reference: MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]**

(3) In order to meet the 0.020 grains per SCFD (corrected to 50% excess oxygen) particulate matter emissions limit of COMAR 26.11.09.06B(2), the Permittee shall:

- (a) Use only fuel oil (No. 2 or No. 6) in Boilers #1 through #4 with an ash content weight percent that will not cause total particulate matter emissions from the single powerhouse stack to exceed 0.020 grains per SCFD (corrected to 50% excess oxygen);
- (b) Use natural gas and fuel oil (No. 2 or No. 6) in separate operating boilers that will not cause total particulate matter emissions from the single powerhouse stack to exceed 0.020 grains per SCFD (corrected to 50% excess oxygen); or
- (c) Install a dust collector device designed to meet the 0.020 grains per SCFD (corrected to 50% excess oxygen) particulate matter emissions limit per COMAR 26.11.09.06B(1)(a).

[Reference: MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]

(4) The Permittee shall design and operate the ultra-low NO_x burners on Boilers 1-4 and the low NO_x burner on Boiler 6 to meet the emission rate of 500 lbs./day (or 624 lbs./day, when appropriate) on a 30-day rolling average. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Sections V(11)(a) & V(10)(d) & MDE Permit to Construct 510-5-1476 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates**

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proposed in a letter to the EPA dated March 14, 2014 and approved by the EPA in a letter on April 2, 2014.]

(5) The primary combined NO_x emission limit that applies to the operation of boilers 1-4 and 6 is 500 lbs./day, calculated on a 30-day rolling average as described in the Order Modifying Consent Decree. This limit applies at all times, except in the circumstances described below when the limit of 624 lbs./day applies.

(a) Any day in which:

- i. Boiler 6 operates at any point in time;
- ii. Boiler 6 operates in conjunction with any of the CE boilers; or
- iii. Boiler 6 does not operate and only three (3) of the CE boilers operate would count toward the 500 lbs./day 30 day rolling average.

(b) If there are seven calendar days within a 30-day period in which Boiler 6 does not operate and each of the four CE boilers operates for some period of time in that calendar day, then the combined NO_x emission limit is 624 lbs./day. The seven days do not need to be consecutive.

(c) ASR will calculate the 30-day rolling average each day. If all four CE boilers operated for six days or less within the previous 30 calendar day period, the limit of 500 lbs./day applies. If all four CE boilers operated seven days or more during the previous 30-calendar day period, the limit of 624 lbs./day applies.

[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(11)(a) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014, and approved by the EPA in a letter on April 2, 2014.]

(6) The Permittee shall continuously operate the NO_x control technology at all times of boiler operation. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(11)(b) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]**

(7) The total combined NO_x emissions from Boilers 1-4 & 6 in any consecutive 12-month period shall not exceed 60 tons. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(13) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014, and approved by the EPA in a letter on April 2, 2014.]**

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(8) The total combined NO_x emissions from Boilers 1-4 & 6 in any calendar month shall not exceed 6.0 tons. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(14) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]**

Compliance Demonstration.

(1) The Permittee shall maintain electronically for at least five (5) years, and shall make available to the Department upon request, records of the following information:

(a) Monthly fuel oil (No. 2 or No. 6) usage in gallons per month and the total fuel usage (No. 2 or No. 6) for the previous rolling 12-month period.

[Reference: MDE Permit to Construct 510-5-1444 through 5-1447(August 28, 2014)]

(b) To comply with the annual emissions cap - the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the total amount of NO_x emissions for the current month and the previous eleven months. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(20) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]**

(c) To comply with the monthly emissions cap - the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the amount of NO_x emissions for each operating day during the month. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(21) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]**

(d) All stack emissions test documents. **[Reference: MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]**

(2) To comply with the limit on combined total hours of operation for Boilers #1 through #4, the Permittee shall maintain electronically for at least five (5) years, and shall make available to the Department upon request, monitoring records of the hours of operation of each boiler. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(19) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]**

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Emission Units: C6

Fuel burning equipment.

C6 – One (1) Babcock and Wilcox boiler rated at 300 MMBtu/hr. firing natural gas and equipped with a low NO_x burner and flue gas recirculation. (MDE Reg. No. 510-0314-5-1476)

Background

On January 18, 2013, a permit to construct was issued for the addition of an Ultra-Low NO_x Burner (ULNB) to Boiler 6. The addition of this burner is mandated by a District Court Consent Decree with the EPA (Civil Action No. JBK-12-1048). Also, the Permit to Construct included the re-rate of Boiler 6 from 249 MMBtu/hr. to 300 MMBtu/hr. and to limit the fuel use in Boiler 6 to natural gas only.

Note: Per the District Court Consent Decree modified by the District Court Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014, and approved by the EPA in a letter on April 2, 2014, ASR does not need to install a ULNB on Boiler 6.

A Permit to Construct was issued on August 18, 2014, to incorporate the changes from the District Court Order Modifying Consent Decree dated August 5, 2013.

40 CFR 60, Subpart Db - Standards Of Performance For Industrial-Commercial-Institutional Steam Generating Units:

This regulation applies to Boiler #6 because the boiler was constructed after June 19, 1984, and has a heat input capacity greater than 100 MMBtu/hr. (40 CFR §60.40b(a)). While the addition of the ULNB does not meet the definition of “modification” found in 40 CFR §60.2, the re-rating of Boiler #6 from 249 MMBtu/hr. to 300 MMBtu/hr. does meet this definition. The definition of a modification indicates that the emissions must increase or that a pollutant will be emitted after the modification that was not emitted prior to the modification.

Boiler #6 is exempt from SO₂ requirements in this regulation per §60.42b(k)(2).

40 CFR 63, Subpart DDDDD - National Emission Standards For Hazardous Air Pollutants For Industrial, Commercial, And Institutional Boilers And Process Heaters:

This regulation does not apply because the facility is not a major source of Hazardous Air Pollutants (40 CFR §63.7485).

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40 CFR 63, Subpart JJJJJJ - National Emission Standards For Hazardous Air Pollutants For Industrial, Commercial, And Institutional Boilers Area Sources:

This boiler is exempt from this regulation because it will be burning natural gas only. Gas fired boilers are defined in 40 CFR §63.11237 and exempted in 40 CFR §63.11195(e).

Compliance Status

During the 2022 full compliance report, Boiler #6 was operating on natural gas. NSPS Subpart Db – Semiannual report was received for the period Jan 2022 the June 2022. Boiler #6 operated on natural gas only. The 30-day average NO_x rate was between 0.033 – 0.082 lb./MMBtu. There were no exceedances to the NO_x emission rate during this period. The unit passed the daily calibration every day of the reporting period. There were no issues with calibration drift. CEMs downtime report shows 13 hrs. during this period over 6 different days (due to CEM maintenance). The most recent RATA was conducted April 7, 2022. Tuning activities were performed on Boiler #6 during March 22 and April 1, 2022, by B&W and Rockwell after the conclusion of the commissioning of a new Combustion Control System. EPA Consent Order Reporting Period (July 1, 2022, thru Dec 31, 2022) stated the following: **C6:** experienced a total downtime of 17 hours in the reporting period out of a total operating time of 1770 hours.

Applicable Standards/Limits:

A. Control of Visible Emissions

COMAR 26.11.09.05A - Visible Emissions

“(2) Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.

(3) Exceptions. “Section A(1) and (2) of this **regulation** do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period.”

Compliance Demonstration.

The Permittee shall report, in accordance with requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Administration.

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B. Control of Nitrogen Oxides

(1) **COMAR 26.11.09.08B(1)(a)**, Control of NO_x Emissions for Major Stationary Sources - General Requirements and Conditions. "Emission Standards and Requirements. A person who owns or operates an installation that causes NO_x emissions subject to this regulation is in compliance with this regulation if the person establishes compliance with the emissions standards in §B(1)(c) of this regulation."

(2) **COMAR 26.11.09.08B(1)(c)**, Control of NO_x Emissions for Major Stationary Sources – General Requirements and Conditions. "Emission Standards in Pounds of NO_x per Million Btu of heat input."

Fuel	Tangential- Fired	Wall-Fired
Gas only	0.20	0.20
Gas/Oil	0.25	0.25
Coal (dry bottom)	0.38	0.38
Coal (wet bottom)	1.00	1.0

(3) **COMAR 26.11.09.08B(2)(a)(i) and (b), (c), and (d)**, Control of NO_x Emissions for Major Stationary Sources – Demonstration of Compliance.

(a) "A person subject to a NO_x emission standard in this regulation shall demonstrate compliance as follows:

(i) For installations equipped with a CEM, compliance with the NO_x emissions standards in this regulation shall be established using CEM data; or"

(ii) *Not applicable.*

(b) "CEMs shall be certified in accordance with 40 CFR Part 60, Appendix B, or Part 75, Appendix A."

(c) "CEMs shall meet the quality assurance criteria in 40 CFR Part 60, Appendix F, or, for sources subject to Title IV of the Clean Air Act (Acid Rain), the quality assurance criteria in 40 CFR Part 75, Appendix B."

(d) "Except as otherwise established by the Department and approved by the EPA, for a person who establishes compliance with the NO_x emissions standards in this regulation using a CEM, compliance shall be determined as 30-day rolling averages."

(e) *Not applicable.*

(4) **COMAR 26.11.09.08B(5) - Operator Training**.

(a) "For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation."

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(b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department.”

(5) **COMAR 26.11.09.08C(3)**, Requirements for Fuel-Burning Equipment with a Rated Heat Input Capacity of 250 Million Btu Per Hour or Greater. “A person who owns or operates fuel burning equipment with a rated heat input capacity of 250 Million Btu per hour or greater shall install, operate, calibrate, and maintain a certified NO_x CEM or an alternative NO_x monitoring method approved by the Department and the EPA on each installation.”

(6) The Permittee shall design and operate the ultra-low NO_x burners on Boilers 1-4 and the low NO_x burner on Boiler 6 to meet the emission rate of 500 lbs./day (or 624 lbs./day, when appropriate) on a 30-day rolling average. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Sections V(11)(a) & V(10)(d) & MDE Permit to Construct 510-5-1476 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014, and approved by the EPA in a letter on April 2, 2014.]**

(7) The primary combined NO_x emission limit that applies to the operation of boilers 1-4 and 6 is 500 lbs./day, calculated on a 30-day rolling average as described in the District Court Consent Decree. This limit applies at all times, except in the circumstances described below when the limit of 624 lbs./day applies.

(a) Any day in which:

(1) Boiler #6 operates at any point in time;

(2) Boiler #6 operates in conjunction with any of the CE boilers; or (3) Boiler #6 does not operate and only three (3) of the CE boilers operate would count toward the 500 lbs./day 30 day rolling average.

(b) If there are seven calendar days within a 30-day period in which Boiler #6 does not operate and each of the four CE boilers operates for some period of time in that calendar day, then the combined NO_x emission limit is 624 lbs./day. The seven days do not need to be consecutive.

(c) ASR will calculate the 30-rolling average each day. If all four CE boilers operated for six days or less within the previous 30 calendar day period, the limit of 500 lbs./day applies. If all four CE boilers operated seven days or more during the previous 30-calendar day period, the limit of 624 lbs./day applies.

[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(11)(a) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a

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letter to the EPA dated March 14, 2014, and approved by the EPA in a letter on April 2, 2014.]

(8) The total **combined** NO_x emissions from Boilers #1-#4 & #6 in any consecutive 12-month period shall not exceed 60 tons. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(13) & MDE Permit to Construct 510-5-1476 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014, and approved by the EPA in a letter on April 2, 2014.]**

(9) The total **combined** NO_x emissions from Boilers #1-#4 & 6 in any calendar month shall not exceed 6.0 tons. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(14) & MDE Permit to Construct 510-5-1476 (August 28, 2014)]**

(10) The Permittee shall not cause to be discharged into the atmosphere any gases that contain NO_x (expressed as NO₂) in excess of 86 ng/J (0.20 lb./MMBtu) heat input. This limit applies at all times including periods of startup, shutdown, or malfunction. Compliance with this emission limit is determined on a 30-day rolling average basis. **[Reference: 40 CFR §60.44b(l)(1), 40 CFR §60.44b(h), 40 CFR §60.44b(i), and 40 CFR §60.46b(a) & MDE Permit to Construct 510-5-1476 (August 28, 2014)]**

(11) The Permittee shall continuously operate the low NO_x burner at all times of boiler operation. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(11)(b) & MDE Permit to Construct 510-5-1476 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014, and approved by the EPA in a letter on April 2, 2014.]**

(12) **COMAR 26.11.40-NO_x Ozone Season Emission Caps for Non-trading Large NO_x Units.**

.02 Applicability.

“A. The owner or operator of a non-trading large NO_x unit, that is not a unit subject to the federal Cross State Air Pollution Rule NO_x Ozone Season Group 2 Trading Program established under 40 CFR Part 97, Subpart EEEEE, shall comply with the ozone season NO_x emission limitation, monitoring, record keeping, and reporting requirements for ozone season emissions of NO_x set forth in this chapter. *(This is superseded by Group 3 Subpart GGGGG published April 30, 2021, effective June 29, 2021).*

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B. The requirements of this chapter apply to a person who owns or operates a non-trading large NO_x unit located at the affected sources in §C of this regulation.

C. Affected Sources and Units. (1) American Sugar Unit No. C6.”

.03 NO_x Ozone Season Emission Caps.

A. The total combined NO_x ozone season emissions for all non-trading large NO_x units subject to this chapter may not exceed 1013 tons in accordance with the 40 CFR Part 97, Subpart E, Appendix C.

B. NO_x Ozone Season Emission Caps.

(1) The total combined ozone season NO_x emissions from all the affected units at an affected source as identified in Regulation .02C of this chapter may not exceed the NO_x ozone season emission caps in §B(2) of this regulation.

(2) Table – NO_x Ozone Season Emission Caps.

Affected Sources	NO _x Ozone Season Emission Caps Beginning May 1, 2018
American Sugar	24 tons

Compliance Demonstration

(1) The Permittee shall conduct the performance test as required under §60.8 using the continuous system for monitoring NO_x under §60.48b to determine compliance with the NO_x emission limit as follows:

Following the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, the Permittee shall determine compliance with the NO_x standards under §60.44b on a continuous basis through the use of a 30-day rolling average emission rate. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NO_x emission data for the preceding 30 steam generating unit operating days.

(2) Repeat certification testing when the Department determines that the CEM data may not meet performance specifications because of component replacement or other conditions that affect the opacity of generated data.

[Reference: 40 CFR §60.46b(c) and 40 CFR §60.46b(e)(1) and (3) & COMAR 26.11.01.11E(2)(b)]

(1) At a point in the stack prior to a point at which boiler flue gas combines with flue gas from any other boiler, American Sugar shall install and make operational, a NO_x continuous emissions monitoring system (CEMS) to monitor NO_x emissions in accordance with the requirements of 40 CFR Part 60. The CEMS shall be installed and operated in accordance with the plan approved by the Department and EPA under the provisions of COMAR 26.11.01.11B(1)(a).

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[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(15) and COMAR 26.11.01.11B(1)(a) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014) & COMAR 26.11.40.04A(1)]

(2) The Permittee shall calibrate, maintain, and operate a continuous emissions monitoring system, and record the output of the system for measuring NO_x emissions in accordance with 40 CFR §60.48b(b)(1).

(3) Each CEMs shall be installed, certified, calibrated, maintained, and operated in accordance with the applicable requirements of 40 CFR Part 60, and any requirements established by applicable Maryland regulations. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(17) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]**

(4) The Permittee shall install, calibrate, maintain, and operate CEMS for measuring NO_x and O₂ (or CO₂) emissions discharged to the atmosphere, and shall record the output of the system. **[Reference: 40 CFR §60.48b(b)(1)]**

(5) The procedures under §60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring system. The span value for NO_x is 500 ppm. **[Reference: 40 CFR §60.48b(e)(2)(i)]**

(6) The CEMS shall monitor and record the applicable NO_x Emission Rate for Boiler #6 to demonstrate compliance with the NO_x emission rates and shall be continuously operated, except during CEMS breakdowns, repairs, calibration checks, and zero span adjustments. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(16) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]**

(7) The CEMS shall be operated, and data recorded during all periods of operation of Boiler #6 except for CEMS breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments. **[Reference: 40 CFR §60.48b(c)]**

(8) The Permittee shall measure all emissions of NO_x with the CEMS. During any period of time when any CEMS is inoperable or not measuring NO_x emissions from Boiler 6, the Permittee shall apply the missing data substitution procedures in 40 CFR Part 75, Subpart D. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(18) and 40 CFR §60.48b(f) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]**

(9) To comply with the annual emission cap, the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the total amount of NO_x emissions for the current month and the previous eleven months.

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[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(20) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]

(10) To comply with the monthly emissions cap, the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the amount of NO_x emissions for each Operating Day during the month. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(21) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]**

(11) The 1-hour average NO_x emission rates measured by the continuous NO_x monitor required by 40 CFR §60.48b(b) and required under §60.13(h) shall be expressed in ng/J or lb./MMBtu heat input and shall be used to calculate the average emission rates under §60.44b. The 1-hour averages shall be calculated using the data points required under §60.13(h)(2). **[Reference: 40 CFR §60.48b(d)]**

(12) The Permittee shall use the alternative measurement method approved by the Department and the EPA if the Permittee is unable to obtain emissions data from CEMS because of a malfunction of the CEMS for more than 2 hours in duration. **[Reference: COMAR 26.11.01.11B(4)]**

(13) The Permittee shall ensure that the CEMS used to monitor a gas concentration shall meet the quality assurance criteria of 40 CFR Part 60, Appendix F, as amended, which is incorporated by reference, or, if applicable, the quality assurance criteria of 40 CFR Part 75, Appendix B, as amended. **[Reference: COMAR 26.11.01.11C]**

(14) The CEM used to monitor a gas concentration shall record not less than four equally spaced data points per hour and automatically reduce data in terms of averaging times consistent with the applicable emission standard. **[Reference: COMAR 26.11.01.11D(2)]**

The Permittee shall maintain records for at least two (2) years of the following information for Boiler 6 for each operating day.

- (a) Calendar date;
- (b) The average hourly NO_x emission rates (expressed as NO₂) (ng/J) or lb./MMBtu heat input) measured or predicted;
- (c) The 30-day average NO_x emission rates (ng/J or lb./MMBtu heat input) calculated at the end of each Boiler 6 operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 Boiler 6 operating days;

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- (d) Identification of the Boiler 6 operating days when the calculated 30-day average NO_x emission rates are in excess of the NO_x emissions standards under §60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken;
- (e) Identification of the Boiler 6 operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;
- (f) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;
- (g) Identification of the “F” factor used for calculations, method of determination, and type of fuel combusted;
- (h) Identification of the times when the pollutant concentration exceeded full span of the CEMS;
- (i) Description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specification 2 or 3 in appendix B of 40 CFR Part 60; and
- (j) Results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1 of 40 CFR Part 60.

[Reference: 40 CFR §60.49b(g), (i) and (o) & COMAR 26.11.40.04A(2)]

(2) The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, records of the following information:

- (a) Annual fuel use records for Boiler #6;
- (b) Log of operation and maintenance of the CEMs including duration and reason of any malfunctions; and
- (c) Records of operator training.

[Reference: MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]

(1) The Permittee must submit excess emission reports for any excess emissions that occurred during the reporting period. The Permittee must maintain these records on site for at least two (2) years. **[Reference: 40 CFR §60.49b(h)(2)(i) and (o)]**

(2) The Permittee must report orally or by electronic or facsimile transmission to the U.S. EPA and MDE, no later than 24 hours after the Permittee knew or should have known of any violation of the District Court Consent Decree, any permit regulations, or any event that may pose an immediate threat to the public health or welfare of the environment. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section IX(40) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]**

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(3) COMAR **26.11.09.08K** - Reporting Requirements.

(a) "When demonstration of compliance with the NO_x emission standards in this regulation is based on CEM data, quarterly emission reports shall be submitted to the Department on or before the thirtieth day of the month following the end of each calendar quarter.

(b) When compliance with this regulation is demonstrated by a stack test, the results of the stack tests required by this regulation shall be submitted to the Department within 45 days after completion of the test.

(c) A person subject to this regulation shall maintain annual fuel use records on site for not less than 3 years and make these records available to the Department upon request."

(4) The Permittee must report to the Department, by telephone, any CEM system downtime that lasts or is expected to last more than 24 hours, by 10 a.m. of the first regular business day following the breakdown. The Permittee must also notify the Department, by telephone, when an out-of-service CEMS is back in operation. **[Reference: COMAR 26.11.01.11E(1)(a) and (b)]**

(5) The Permittee shall comply with the CEM system downtime reporting requirements of COMAR 26.11.01.11E:

(a) All CEM system downtime that lasts or is expected to last more than 24 hours shall be reported to the Department by telephone before 10 a.m. of the first regular business day following the breakdown.

(b) The system breakdown report required by COMAR 26.11.01.11E(1)(a) shall include the reasons, if known, for the breakdown and the estimated period of time that the CEMS will be down. The Permittee shall notify the Department by telephone when an out-of-service CEM is back in operation and producing valid data. **[Reference: COMAR 26.11.01.11E(1)]**

(6) The Permittee shall submit to the Department quarterly, a CEMs summary report not later than 30 days following each calendar quarter to demonstrate compliance with the NO_x emissions limits. The report shall include the following information:

(a) The cause, time periods, and magnitude of all emissions which exceed the applicable emission standards;

(b) The source downtime including the time and date of the beginning and end of each downtime period and whether the source downtime was planned or unplanned;

(c) The time periods and cause of all CEM downtime including records of any repairs, adjustments, or maintenance that may affect the ability of the CEM to meet performance specifications of emission data;

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- (d) Quarterly totals of excess emissions, installation downtime, and CEM downtime during the calendar quarter;
- (e) Quarterly quality assurance activities;
- (f) Daily calibration activities that include reference values, actual values, absolute or percent of span differences, and drift status; and
- (g) Other information required by the Department that is determined to be necessary to evaluate the data, to ensure that compliance is achieved, or to determine the applicability of this regulation.

[Reference: COMAR 26.11.01.11E(2)(c) & COMAR 26.11.40.04B]

(7) The Permittee shall submit within 30 days following each January 1st and July 1st, a semi-annual report to the U.S. EPA for the immediately preceding half-calendar year period. This report shall:

- (a) Identify any and all dates on which the Permittee has installed, or describe the progress of installation of the low NO_x burner required for NO_x control, emission limits, CEMs, and monitoring requirements and describe any problems encountered or anticipated during such installation, together with implemented or proposed solutions;
- (b) Provide all CEMS data collected for Boiler 6 including an explanation of any periods of CEMS downtime together with any missing data for which the Permittee applied and missing data substitution procedures under Section VI.B of the District Court Consent Decree;
- (c) Demonstrate compliance with all applicable 30-day rolling average emission limits in Section V of the District Court Consent Decree; and
- (d) Describe the status of any operation and maintenance work relating to activities under the District Court Consent Decree.

[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section IX(38) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014) & COMAR 26.11.40.04A(2)]

C. Operational Limitations

(1) The Permittee shall burn only natural gas in this boiler. **[Reference: MDE Permit to Construct 510-5-1476 (August 28, 2014)]**

(2) The Permittee must use gaseous fuels with potential SO₂ emissions rates of 26 ng/J (0.060 lb./MMBtu) or less and shall not use post-combustion technology to reduce SO₂ or PM emissions. The Permittee must meet these requirements in order to not be required to install or operate a COMS. **[Reference: 40 CFR §60.48b(j)(2) & MDE Permit to Construct 510-5-1476 (August 28, 2014)]**

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Compliance Demonstration.

The Permittee shall install meters to record the hours of operation of this boiler and shall maintain the monitoring records in an electronic format for at least five (5) years. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(19) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]**

The Permittee shall record and maintain records of the amounts of natural gas combusted during each day and calculate the annual capacity factor for natural gas for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. The records must be maintained on-site for at least two (2) years and be made available to the Department upon request.

[Reference: 40 CFR §60.49b(d)(1) and (o)]

Emission Units: R29-1

R29-1 – Raw Sugar Unloading and Conveying (MDE Reg. No. 6-2019).

A Permit to Construct issued August 5, 2021, for the installation of the Additional sugar conveyance at the Old Raw Sugar Shed [To provide additional storage capacity, two schemes were installed: (1) A traveling conveyor from the shed's shuttle RSS-1 to feed and discharge directly into the storage barge – at a maximum throughput rate of 1,200,000 lb./hr.; and (2) a clam shell loader to scoop raw sugar from the barge for placement in the Old Raw Sugar Shed – at a maximum throughput rate of 250,000 lbs./hr.]

Compliance Status

During the 2022 full compliance report, the refinery was in full operation. A ship was being unloaded at the dock. There were no fugitive dust emissions observed from that unloading process. A three-alarm fire broke out at the raw sugar shed on April 20, 2021. The raw sugar shed burned down and then collapsed. The debris from the fire has been removed from the site and the area where the shed previously stood has been cleared as they prepare to add a new sugar shed. A Construction Permit was issued for conveyance equipment to transfer raw sugar from the barge to a different storage area or a temporary holding barge for the raw sugar. A Report of Excess Emissions due to the fire was received at the Department April 28, 2021.

Applicable Standards/Limits:

A. Control of Visible Emissions

COMAR 26.11.06.02 - Visible Emission Standards.

C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”

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A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:
(a) The visible emissions are not greater than 40 percent opacity; and
(b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”

Compliance Demonstration

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. **[Reference: COMAR**

26.11.03.06C]

COMAR 26.11.01.07C – Report of Excess Emissions

“(1) In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone.

- (2) Telephone reports of excess emissions shall include the following information:
- (a) The identity of the installation and the person reporting;
 - (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides);
 - (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and
 - (d) The actual or probable cause of the excess emissions.”

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B. Control of Particulate Matter

COMAR 26.11.06.03C(1) - Particulate Matter from Unconfined Sources.

“A person may not cause or permit emissions from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions. In making this determination, the Department shall consider technological feasibility, practicality, economic impact, and the environmental consequences of the decision.”

Compliance Demonstration

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request: (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and (2) a log with records of the dates and description of maintenance activity performed.

[Reference: COMAR 26.11.03.06C]

Emission Units: **R29-3, 4; S7B-2; S7-12; S7-13, & S7-14**

R29-3: Melter Feed

R29-4: Diatomite Fugitives

S7B-2: Bin Tower Rejects Box (MDE Reg. No. 8-0212)

S7-12: Maltodex Supersack Unloading System (MDE Reg. No. 8-0266)

S7-13: Remelt Shredder Fugitives

S7-14: Magnets Tailings Fugitives (MDE Reg. No. 8-0223)

Compliance Status

During the 2022 full compliance report, the refinery was in full operation. Monthly inspections of visible emission sources have been conducted and the results recorded. Records are kept for at least 5 years. A preventative maintenance plan is in effect for the control equipment with a time schedule associated with it.

Applicable Standards/Limits

A. Control of Visible Emissions

COMAR 26.11.06.02 - Visible Emission Standards.

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C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”

A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”

Compliance Demonstration

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. **[Reference: COMAR**

26.11.03.06C]

B. Control of Particulate Matter

COMAR 26.11.06.03B(2) - Particulate Matter from Confined Sources. “(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”

Compliance Demonstration

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for

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completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request: (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and (2) a log with records of the dates and description of maintenance activity performed. **[Reference: COMAR 26.11.03.06C]**

Emission Units: **D28-1; D10-1; D10-2; D10-3**

Carbonation System:

D28-1: Lime silo equipped with a baghouse (RP-C-1). (MDE Reg. No. 8-0301)

D10-1: Saturator 1 equipped with a demister and a scrubber (RP-C-2). (MDE Reg. No. 8-0301)

D10-2: Saturator 2 equipped with a demister and a scrubber (RP-C-3). (MDE Reg. No. 8-0301)

D10-3: Saturator 3 equipped with a demister and a scrubber (RP-C-4). (MDE Reg. No. 8-0301)

Compliance Status

During the 2022 full compliance report, the refinery was in full operation. Monthly inspections of visible emission sources have been conducted and the results recorded. Records are kept for at least 5 years. A preventative maintenance plan is in effect for the control equipment with a time schedule associated with it.

Applicable Standards/Limits

A. Control of Visible Emissions

COMAR 26.11.06.02 - Visible Emission Standards.

C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”

A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”

Compliance Demonstration

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and

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look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation. If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. **[Reference: COMAR 26.11.03.06C]**

B. Control of Particulate Matter

COMAR 26.11.06.03B(2) - Particulate Matter from Confined Sources. “(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”

Compliance Demonstration

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. **[Reference: COMAR 26.11.03.06]**

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (1) a copy of the preventative maintenance plan for each dust collector;
- (2) records of the dust collector malfunction, and the corrective action taken to bring it back into proper operation; and
- (3) a log with records of the dates and description of maintenance activity performed.

[Reference: COMAR 26.11.03.06C]

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Emission Units: **D2-1 & U5-1**

D2-1: Mud Loading (MDE Reg. No.8-0301).

U5-1: Cooling Tower (MDE Reg. No. 8-0383).

Compliance Status

During the 2022 full compliance report, the refinery was in full operation. Monthly inspections of visible emission sources have been conducted and the results recorded. Records are kept for at least 5 years. A preventative maintenance plan is in effect for the control equipment with a time schedule associated with it.

Applicable Standards/Limits

A. Control of Visible Emissions

COMAR 26.11.06.02 - Visible Emission Standards.

C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”

A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”

Compliance Demonstration

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and

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(4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. **[Reference: COMAR 26.11.03.06C]**

B. Control of Particulate Matter

COMAR 26.11.06.03C(1) - Particulate Matter from Unconfined Sources.

“A person may not cause or permit emissions from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions. In making this determination, the Department shall consider technological feasibility, practicality, economic impact, and the environmental consequences of the decision.”

Compliance Demonstration

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request: (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and (2) a log with records of the dates and description of maintenance activity performed. **[Reference: COMAR 26.11.03.06C]**

Emission Units: **S5-1 thru S5-6; S5-8A thru S5-8G; S7A-1; S7-5 thru S7-7; S7-8A thru S7-8D; S7-10A & S7-10B; S7B-1, S7-11A thru S7-11C.**

S5-1: Scrap Melter 1 equipped with a rotoclone scrubber(RP-C-10). (MDE Reg. No. 8-0226)

S5-2: Scrap Melter 2 (MDE Reg. No. 8-0382)

S5-3: Remelt Screw Conveyors (MDE Reg. No. 8-0382)

S5-4: Invert system controlled by a rotoclone scrubber (RP-C-10). This system consists of the following equipment:

[S5-4A – Invert Cloudy Tank (5-3-16); S5-4B – Invert Precoat Tank (5-3-17); S5-4C – Sucrose Cloudy Tank (5-3-13); S5-4D – Sucrose Precoat Tank (5-3-14)]

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S5-4E – Clear Sucrose Tank (5-3-12); S5-4F – Clear Invert Tank (5-3-15)].
(MDE Reg. No. 6-2022)

S5-5: Caustic Fugitives associated with the invert system. (MDE Reg. No. 6-2022)

S5-6: Soft Sugar Shredder. (MDE Reg. No. 6-2020)

S5-8A-B: Two (2) Dryers (Powdered Specialty Sugars) each equipped with a venturi scrubber (DW-1) (RP-C-33), (DW-2) (RP-C-34).

S5-8D: Liquid Sugar Cooler (Powdered Specialty Sugars) equipped with a Sly venturi scrubber (WS-1) (RP-C-35).

S5-8E: Three (3) Centrifugal Separators (Powdered Specialty Sugars) equipped with a Sly venturi scrubber (WS-1) (RP-C-36).

S5-8F: Washout Tanks and Beater controlled by a Rotoclone.

S5-8G: Packaging and Conveying Equipment controlled by a Sly venturi scrubber (WS-1) (RP-C-36).

(MDE Reg. No. 8-0332)

S1-1: FEECO Rotary sugar dryer equipped with an Entoleter vortex scrubber (RP-C-15) (MDE Reg. No. 0320)

S7A-1: Bulk Sugar Conveying System equipped with a scrubber (RP-C-25).

This system consists of the following equipment:

[S7A-RE1 – Bucket Elevator RE-1; S7A-XE1 – Bucket Elevator XE-1; S7A-XRS1 – Bucket Elevator XRS-1; S7A-UE1 – Bucket Elevator UE-1; S7A-UE2A – Bucket Elevator UE-2A; S7A-UE2B – Bucket Elevator UE-2B; S7A-RE2 – Bucket Elevator RE-2; S7A-U1 – Storage Bin U1; S7A-U2 – Storage Bin U2; S7A-U3 – Storage Bin U3; S7A-U4 – Storage Bin U4; S7A-U5 – Storage Bin U5; S7A-U6 – Storage Bin U6; S7A-XF1 – Storage Bin XF1; S7A-XF2 – Storage Bin XF2; S7A-V1 – Storage Bin V1; S7A-V2 – Storage Bin V2; S7A-V3 – Storage Bin V3; S7A-V4 – Storage Bin V4; S7A-V5 – Storage Bin V5; S7A-V6 – Storage Bin V6; S7A-C1 – Storage Bin C1; S7A-F1 – Storage Bin F1; S7A-AR1 – Storage Bin AR1; S7A-AR2 – Storage Bin AR2; S7A-AR3 – Storage Bin AR3; S7A-AR4 – Storage Bin AR4; S7A-AR5 – Storage Bin AR5; S7A-AR6 – Storage Bin AR6; S7A-AR7 – Storage Bin AR7; S7A-AR8 – Storage Bin AR8, and S7A-RJX – Screw Conveyor Rejects Transfer]. (MDE Reg. No. 8-0212)

S7-5, S7-6, S7-7: Packaging Feed Tanks each equipped with a filter (RP-C-26, -27 & -28, respectively). (MDE Reg. No. 8-0265)

S7-8: Packaging Operations controlled by a rotoclone scrubber (7-6-1) (RP-C-29). This system consists of the following equipment:

[S7-8A: Fawema Packaging System; S7-8B: Paxall Packaging System; S7-8C: Clouds Packaging System, and S7-8D: Handi Pak System]. (MDE Reg. No. 8-0265)

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S7-10: Packaging System controlled by a Wheelabrator dust collector (7-5-1) (RP-C-30).

[S7-10A: Hesser Bagging System; S7-10B: Supersack Unloading System]. (MDE Reg. No. 8-0265)

S7B-1: Bulk Loading System with an Entoleter scrubber (RP-C-31) and DCL UN800 Dust Collectors. (MDE Reg. No. 8-0223)

S7-11: Super-Sack Sugar Packaging Line controlled by Wheelabrator dust collectors.

[S7-11A: Thiele Supersack System; S7-11B: Tub Packaging Line controlled by Wheelabrator 7-5-2 (RP-C-30), and S7-11C: Simplex Packaging Line controlled by a Wheelabrator dust collector 6-5-1 (RP-C-12)]. (MDE Reg. No. 8-0287)

Compliance Status

During the 2022 full compliance report, the refinery was in full operation. Monthly inspections of visible emission sources have been conducted and the results recorded. Records are kept for at least 5 years. Preventative maintenance plans have been developed along with timeframes to inspect certain items. Verified that the exhaust gases: (1) from the specialty sugar process vent through the cyclonic separator and the venturi scrubber; (2) from the washout tanks vent through the rotoclone; (3) from the packing and conveying equipment vent through the rotoclone and the venturi scrubber.

Applicable Standards/Limits

A. Control of Visible Emissions

COMAR 26.11.06.02 - Visible Emission Standards.

C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”

A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”

Compliance Demonstration

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

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If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. **[Reference: COMAR 26.11.03.06C]**

B. Control of Particulate Matter

COMAR 26.11.06.03B - Particulate Matter from Confined Sources.

“(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”

COMAR 26.11.06.03D - Particulate Matter from Materials Handling and Construction.

“A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:

- (1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts.
- (3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.
- (4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would covering the vehicles.

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- (5) The paving of roadways and their maintenance in clean condition.
- (6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water.”

Compliance Demonstration

(1) The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. **[Reference: COMAR 26.11.03.06C]**

(2) The exhaust gases from two liquid sugar dryers (VD1 and VD-2), the liquid sugar coolers (VC-1) and three centrifugal separators (SK-1, SK-2, and SK-3) shall be vented through the cyclonic separator and the venturi scrubber, when the specialty sugar refining process is operating.

(3) The exhaust gases from the washout tanks/beater shall be vented through the rotoclone scrubber when the specialty sugar refining process is operating.

(4) The exhaust gases from the packing and conveying equipment shall be vented through the rotoclone and the venturi scrubber when the specialty sugar refining process is operating.

[Reference: MDE Permit to Construct #510-8-0332 (July 10, 2003)].

The Permittee shall maintain records of the amount and type of specialty sugar produced each month for the specialty sugar refining process equipped with four venturi scrubbers shall be kept at the site for at least five (5) years and shall be made available to the Department upon request. **[Reference: MDE Permit to Construct #510-8-0332 (July 10, 2003)].**

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (a) a copy of the preventative maintenance plan for each dust collector;
 - (b) records of the dust collector malfunction, and the corrective action taken to bring it back into proper operation; and
 - (c) a log with records of the dates and description of maintenance activity performed. **[Reference: COMAR 26.11.03.06C]**
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Emission Units: **S6-4 thru S6-7.**

S6-4: BMA Granulator equipped with an Entoleter Scrubber (RP-C-11). (MDE Reg. No. 8-0115)

S6-5: Sugar Packaging Line and Conveying Systems controlled by a shared Wheelabrator dry filter (RP-C-12, RP-C-13, and RP-C-14). This line consists of the following equipment: [S6-5A: Remelt Shredder; S6-5B: Maltrin Tank; S6-5C: Sugar Tank; S6-5D: MFB Feeder; S6-5E : Sugar Feed to Mill 1; S6-5F: Sugar Feed to Mill 2; S6-5G: Sugar Feed to Mill 3; S6-5H: 6-5-1200 Receiver; S6-5I: UB-1 South Hood, and S6-5J: UB-1 Tail End]. (MDE Reg. No. 8-0222)

S6-6: Sugar Packaging Line and Conveying Systems controlled by a shared Wheelabrator dry filter (RP-C-12, RP-C-13, and RP-C-14). This line consists of the following equipment: [S6-6A: Oscillator; S6-6B: DSE-1 (9-25-10); S6-6C: US-2 Scroll, and S6-6D: UB-1 North]. (MDE Reg. No. 8-0296)

S6-7: Sugar Packaging Line and Conveying Systems controlled by a shared Wheelabrator dry filter (RP-C-12, RP-C-13, and RP-C-14). [S6-7A: Receiver 1300 2#; S6-7B: Old V. Bag Packaging System; S6-7C: Receiver 1250; S6-7D: Receiver 6-4-1300; S6-7E: 2# Poly Filler System; S6-7F: New V.B. Filler System; S6-7G: Old V.B. Filler System; S6-7H: Packet Grinder, and S6-7I: 1-4 10X Filler System]. (MDE Reg. No. 8-0225); [S6-7J: Bulkline (Super sack: 1-ton bag) Packaging Line]. (MDE Reg. No. 8-0409)

Compliance Status

During the 2022 full compliance report, the refinery was in full operation. Monthly inspections of visible emission sources have been conducted and the results recorded. Records are kept for at least 5 years. Preventative maintenance plans have been developed along with timeframes to inspect certain items.

Applicable Standards/Limits

A. Control of Visible Emissions

COMAR 26.11.06.02 - Visible Emission Standards.

C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”

A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

(a) The visible emissions are not greater than 40 percent opacity; and

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(b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”

Compliance Demonstration

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

[Reference: COMAR 26.11.03.06C]

The Permittee shall maintain for at least five (5) years and make available to the Department upon request: a record of the results of the monthly inspections and the log of inspection and maintenance; and a log with records of the dates and description of maintenance activities performed. **[Reference: COMAR**

26.11.03.06C & MDE Permit to Construct #510-0314-8-0409 (June 19, 2020)]
COMAR 26.11.01.07C – Report of Excess Emissions

“(1) In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone.

(2) Telephone reports of excess emissions shall include the following information:

- (a) The identity of the installation and the person reporting;
 - (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides);
 - (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and
 - (d) The actual or probable cause of the excess emissions.”
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B. Control of Particulate Matter

COMAR 26.11.06.03B - Particulate Matter from Confined Sources.

“(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”

COMAR 26.11.06.03D - Particulate Matter from Materials Handling and Construction.

“A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:

- (1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts.
- (3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.
- (4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would covering the vehicles.
- (5) The paving of roadways and their maintenance in clean condition.
- (6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water.”

Compliance Demonstration

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. **[Reference: COMAR 26.11.03.06C]**

The exhaust gases from the packing and conveying equipment shall be vented through the rotoclone and the venturi scrubber when the specialty sugar refining process is operating.

The Permittee shall maintain records of the amount and type of specialty sugar produced each month for the specialty sugar refining process equipped with four venturi scrubbers shall be kept at the site for at least five (5) years and shall be made available to the Department upon request. **[Reference: MDE Permit to Construct #510-0314-8-0409 (June 19, 2020)].**

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The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request: (a) a copy of the preventative maintenance plan for each dust collector; (b) records of the dust collector malfunctions and the corrective action taken to bring it back into proper operation; and (c) a log with records of the dates and description of maintenance activity performed. **[Reference: COMAR 26.11.03.06C]**

Emission Units: **S6-1, S6-1A, S6-2, S6-2A, S6-3, S6-3A, S6-8, & S6-9.**

S6-1: Sugar Mill 1 equipped with MAC dry filter (RP-C-16) (MDE Reg. No. 8-0209).

S6-1A: Starch Receiver 1 equipped with a dry filter (RP-C-17). (MDE Reg. No. 8-0209)

S6-2: Sugar Mill 2 equipped with MAC dry filter (RP-C-18) (MDE Reg. No. 8-0209).

S6-2A: Starch Receiver 2 equipped with a dry filter (RP-C-19). (MDE Reg. No. - 8-0209)

S6-3: Sugar Mill 3 equipped with MAC dry filter (RP-C-20) (MDE Reg. No. 8-0125).

S6-3A: Starch Receiver 3 equipped with a dry filter (RP-C-21). (MDE Reg. No. 8-0125)

S6-8: Sugar Pulverizer (Mill 7) equipped with a Mikropul baghouse (RP-C-24). (MDE Reg. No. 8-0266)

S6-9: Starch Bin equipped with a vent filter (RP-C-22). (MDE Reg. No. 8-0125)

Compliance Status

During the 2022 full compliance report, the refinery was in full operation. Monthly inspections of visible emission sources have been conducted and the results recorded. Records are kept for at least 5 years. Preventative maintenance plans have been developed along with timeframes to inspect certain items.

Applicable Standards/Limits

A. **Control of Visible Emissions**

COMAR 26.11.06.02 - Visible Emission Standards.

C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”

A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

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- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period."

Compliance Demonstration

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

[Reference: COMAR 26.11.03.06C]

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. **[Reference: COMAR 26.11.03.06C]**

B. Control of Particulate Matter

COMAR 26.11.06.03B - Particulate Matter from Confined Sources.

"(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."

COMAR 26.11.06.03D - Particulate Matter from Materials Handling and Construction.

"A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:

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- (1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts.
- (3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.
- (4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would covering the vehicles.
- (5) The paving of roadways and their maintenance in clean condition.
- (6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water."

Compliance Demonstration

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (a) a copy of the preventative maintenance plan for each dust collector;
- (b) records of the dust collector malfunction, and the corrective action taken to bring it back into proper operation; and
- (c) a log with records of the dates and description of maintenance activity performed. **[Reference: COMAR 26.11.03.06C]**

Emission Units: **S5-7, S7-15, & S7-16.**

S5-7: Ten (10) Evaporation Pans (Pan 1 thru 9 and 11) (MDE Reg. No. 6-2021)

S7-15: Packaging Video Inkjet Printers (MDE Reg. No. 6-0218)

S7-16: Packaging Adhesive Fugitives (MDE Reg. No. 9-1298).

Compliance Status

During the 2022 full compliance report, the refinery was in full operation. Records of material usage of VOC containing products are kept on site showing the amount of adhesive, solvents and inks used, as well as the VOC content of each. This data is used to calculate VOC emissions for the Emissions Certification Report. Emission Certification Report FY2021 shows that the facility used two types of packaging adhesives: Hot melt glue (TS200) – 0.1% VOC content and cold glue (A1940) – 0.55% VOC content.

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Applicable Standards/Limits

A. Control of Visible Emissions

COMAR 26.11.06.02 - Visible Emission Standards.

C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”

A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”

Compliance Demonstration

The Permittee shall report all occurrences of excess emissions to the Department. [Reference: **COMAR 26.11.01.07**].

B. Control of VOC Emissions

Video Inkjet Packaging Lines- S7-15 (MDE Reg. No. 6-2018)

COMAR 26.11.09.02I. - Good Operating Practices, Equipment Cleanup, and VOC Storage.

“(1) Applicability. The requirements in this section apply to a person who owns or operates an installation that is subject to any requirement in this chapter.

(2) Good Operating Practices.

- (a) A person who is subject to this section shall implement good operating practices to minimize VOC emissions into the atmosphere.
- (b) Good operating practices shall, at a minimum, include the following:
 - (i) Provisions for training of operators on practices, procedures, and maintenance requirements that are consistent with the equipment manufacturers' recommendations and the source's experience in operating the equipment, with the training to include proper procedures for maintenance of air pollution control equipment;
 - (ii) Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use;
 - (iii) Minimize spills of VOC-containing cleaning materials;
 - (iv) Convey VOC-containing cleaning materials from one location to another in closed containers or pipelines;
 - (v) Minimize VOC emissions from cleaning of storage, mixing, and conveying equipment;
 - (vi) As practical, scheduling of operations to minimize color or material changes when applying VOC coatings or other materials by spray gun;

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(vii) For spray gun applications of coatings, use of high-volume low pressure (HVLP) or other high efficiency application methods where practical; and
(viii) As practical, mixing or blending materials containing VOC in closed containers and taking preventive measures to minimize emissions for products that contain VOC.

(c) A person subject to this regulation shall:

(i) Establish good operating practices in writing;

(ii) Make the written operating practices available to the Department upon request; and

(iii) Display the good operating practices so that they are clearly visible to the operator or include them in operator training.

(3) Equipment Cleanup.

(a) A person subject to this section shall take all reasonable precautions to prevent or minimize the discharge of VOC into the atmosphere when cleaning process and coating application equipment, including containers, vessels, tanks, lines, and pumps.

(b) Reasonable precautions for equipment cleanup shall, at a minimum, include the following:

(i) Storing all wastes and waste materials, including cloth and paper that are contaminated with VOC, in closed containers;

(ii) Preparing written standard operating procedures for frequently cleaned equipment, including when practical, provisions for the use of low-VOC or non-VOC materials and procedures to minimize the quantity of VOC materials used;

(iii) Using enclosed spray gun cleaning, VOC-recycling systems and other spray gun cleaning methods where practical that reduce or eliminate VOC emissions; and

(iv) Using, when practical, detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines, containers, and process equipment.

(4) VOC Storage and Transfer.

(a) A person subject to this section who stores VOCs shall, at a minimum, install conservation vents or other vapor control measures on storage tanks with a capacity of 2,000 gallons or more to minimize VOC emissions.

(b) A person subject to this section shall, at a minimum, utilize vapor balance, vapor control lines, or other vapor control measures when VOCs are transferred from a tank truck into a stationary storage tank with a capacity greater than 10,000 gallons and less than 40,000 gallons that store VOCs or materials containing VOCs, other than gasoline, that have a vapor pressure greater than 1.5 psia."

COMAR 26.11.19.16C. - General Requirements.

"A person subject to this regulation shall comply with all of the following requirements:

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- (1) Visually inspect all components on the premises for leaks at least once each calendar month.
- (2) Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date the leak was discovered, and the name of the person who discovered the leak. The tag shall remain in place until the leak has been repaired.
- (3) Take immediate action to repair all observed VOC leaks that can be repaired within 48 hours.
- (4) Repair all other leaking components not later than 15 days after the leak is discovered. If a replacement part is needed, the part shall be ordered within 3 days after discovery of the leak, and the leak shall be repaired within 48 hours after receiving the part.
- (5) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipe fittings.
- (6) Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, and a list of leaks by tag identification number. The log shall be made available to the Department upon request. Leak records shall be maintained for a period of not less than 2 years from the date of their occurrence."

COMAR 26.11.19.06D. Exceptions. "Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, shall be identified in the log and included within the source's maintenance schedule for repair during the next source shutdown."

COMAR 26.11.19.18B. Applicability.

"(1) This regulation applies to a person, owner, or operator who:

(d) Performs screen printing on untreated sign paper at a premises that causes VOC emissions of 20 pounds or more per day from all printing on untreated sign paper at the premises."

F. General Requirements for Digital Imaging.

"A person who owns or operates digital imaging that is subject to this regulation may not cause the discharge of VOC emissions into the atmosphere in excess of 100 pounds on any day from all digital printing at the premises."

COMAR 26.11.35 – VOC from Adhesives and Sealants

Packaging Adhesive Fugitive Lines S7-16 (MDE Reg. No. 9-1298)

COMAR 26.11.35.01 – Applicability and Exemptions

E. "The provisions of Regulation .04A and D of this chapter do not apply to the use of adhesives, sealants, adhesive primers, sealant primers, cleanup solvents, and surface preparation solvents if:

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- (1) The total volume of noncomplying adhesives, sealants, primers, cleanup solvents, and surface preparation solvents applied facility-wide does not exceed 55 gallons per calendar year; and
- (2) The person claiming the usage exemption under §E(1) of this regulation maintains monthly operational records sufficient to demonstrate compliance as required by Regulation .05A of this chapter.

Note: In any calendar year in which ASR uses more than 55 gallons of packaging adhesives, ASR must meet the requirements of COMAR 26.11.35.04A and C.

COMAR 26.11.35.04 - Standards.

A.” Except as provided in §E of this regulation and Regulation .01 of this chapter, on and after January 1, 2009, a person may not:

- (3) Use or apply an adhesive, sealant, adhesive primer, or sealant primer within the State that exceeds the applicable VOC content limits specified in Table 1.”

COMAR 26.11.35.04G - Table 1.

VOC Content Limits for Adhesives, Sealants, Adhesive Primers, Sealant Primers, and Adhesives Applied to Particular Substrates		
Adhesive, sealant, adhesive primer, or sealant primer	VOC content limit	
Category	VOC (grams per liter*)	VOC (pounds per gallon*)
Adhesives Applied to the Listed Substrate		
Porous material	120	1.00

* The VOC content is determined as the weight of volatile compounds, less water and exempt compounds, as specified in Regulation .06 of this chapter.

COMAR 26.11.35.04C. - Surface Preparation or Cleanup Solvent.

- “(1) This section applies to a person subject to this chapter using a surface preparation or cleanup solvent.
- (2) Except as provided in §C(3) of this regulation for single-ply roofing, a person may not use materials for surface preparation containing VOCs unless the VOC content of the surface preparation solvent is less than 70 grams per liter.
- (3) If a surface preparation solvent is used in applying single-ply roofing, a person may not use materials for surface preparation containing VOCs unless the composite vapor pressure, excluding water and exempt compounds, of the surface preparation solvent does not exceed 45 millimeters of mercury at 20°C.
- (4) Except as provided in §C(5) of this regulation, a person may not use materials containing VOCs for the removal of adhesives, sealants, or adhesive or sealant

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primers from surfaces, other than spray application equipment, unless the composite vapor pressure of the solvent used is less than 45 millimeters of mercury at 20°C.

(5) Removal of an adhesive, sealant, adhesive primer, or sealant primer from the parts of spray application equipment shall be performed as follows:

(a) In an enclosed cleaning system or equivalent cleaning system as determined by the test method identified in Regulation .06H of this chapter;

(b) Using a solvent with a VOC content less than or equal to 70 grams of VOC per liter of material; or

(c) Parts containing dried adhesive may be soaked in a solvent if the composite vapor pressure of the solvent, excluding water and exempt compounds, is less than or equal to 9.5 millimeters of mercury at 20°C and the parts and solvent are in a closed container that remains closed except when adding parts to or removing parts from the container.”

COMAR 26.11.35.04E. “A person using adhesives, sealants, adhesive primers, sealant primers, surface preparation solvents, or cleanup solvents subject to this chapter shall store or dispose of all absorbent materials, such as cloth or paper, that are moistened with adhesives, sealants, primers, or solvents subject to this chapter in nonabsorbent containers that are closed except when placing materials in or removing materials from the container.”

COMAR 26.11.35.04F. “A person may not solicit, require the use, or specify the application of an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent, or cleanup solvent if the use or application results in a violation of this chapter. This requirement applies to all written or oral contracts under which an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent, or cleanup solvent subject to this chapter is to be used at a location in the State.”

Compliance Demonstration

Video Inkjet Packaging Lines: S7-15 (MDE Reg. No. 6-2018)

The Permittee shall conduct facility-wide inspections at least once per calendar month to determine the compliance status of facility operations with regard to implementation of “good operating practices” designed to minimize emissions of VOC. [Reference: **COMAR 26.11.03.06C**]

The Permittee shall:

(1) Visually inspect all components (process equipment, storage tanks, pumps, compressors, valves, flanges, pipeline fittings, pressure relief valves) at the facility for VOC leaks at least once each calendar month;

(2) Tag any VOC leak immediately with I.D. Number, the date VOC leak was discovered, and the name of the person who discovered the VOC leak. The tag is to remain in place until the VOC leak is repaired;

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- (3) Take immediate action to repair/control all observed VOC leaks that can be repaired within 48 hours;
- (4) Repair all other VOC leaking components not later than 15 days after the VOC leak is discovered in accordance with COMAR 26.11.19.16C(4);
- (5) If a replacement part is needed, it shall be ordered within 3 days after discovery of the VOC leak and the leak shall be repaired within 48 hours after receiving the part;
- (6) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced; and
- (7) Identify in a log, components that cannot be repaired as required by this regulation because they are inaccessible, or that cannot be repaired during operation of the source and include them within the source's maintenance schedule for repair during the next source shutdown.

[Reference: COMAR 26.11.19.16C and D]

Packaging Adhesive Fugitive lines only (MDE Reg. No. 510-0314-9-1298)

- (1) The Permittee shall not use any adhesive with a VOC content of greater than 1.0 pound per gallon (120 grams per liter). The VOC content is determined as the weight of volatile compounds, less water and exempt compounds as specified in COMAR 26.11.36.06. **[Reference: COMAR 26.11.35.04G, Table 1, footnote]**

- (2) The Permittee shall not use materials for surface preparation containing VOCs unless the VOC content of the surface preparation solvent is less than 70 grams per liter. **[Reference: COMAR 26.11.36.04C(2)]**

- (3) The Permittee shall not use materials containing VOCs for the removal of adhesives, sealants, or adhesive or sealant primers from surfaces other than spray application equipment, unless the composite vapor pressure of the solvent used is less than 45 millimeters of mercury at 20°C. Removal of an adhesive sealant, adhesive primer, or sealant primer from the parts of spray application equipment shall be performed according to COMAR 26.11.36.04C(5).

[Reference: COMAR 26.11.36.04C(4) and (5)]

- (4) The Permittee shall store or dispose of all absorbent materials, such as cloth or paper, that are moistened with adhesives, sealants, primers, or solvents subject to COMAR 26.11.36 in nonabsorbent containers that are closed except when placing materials in or removing materials from the container. **[Reference: COMAR 26.11.36.04E]**

Video Inkjet Packaging Lines S7-15 (MDE Reg. No. 6-2018)

The Permittee shall maintain:

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(a) Written descriptions of all “good operating practices” designed to minimize emissions of VOC from facility-wide operations. **[Reference: COMAR 26.11.19.02I]**

(b) Records of all inspections conducted to determine the facility’s compliance status with regard to implementation of “good operating practices” designed to minimize emissions of VOC from facility-wide operations. The records shall include for each inspection the name of the inspector, the date and time of the inspection, and an account of the findings. **[Reference: COMAR 26.11.03.06C]**

The Permittee shall:

(a) Maintain a log that includes the name of the person conducting the inspection, the date on which VOC leak inspection was made, the findings of the inspection, a list of VOC leaks by tag identification number, the date the part was ordered, and the date the VOC leak was repaired; and

(b) Make the log available to the Department upon request and shall be maintained for a period of not less than two years from the date of the VOC leaks’ occurrence.

[Reference: COMAR 26.11.19.16C(6)]

COMAR 26.11.19.18G - Record Keeping. “A person subject to this regulation shall maintain the following records for not less than 3 years and make the records available to the Department upon request: (3) The VOC content of each ink, coating, cleanup material, or any other material containing VOC that is used at the premises.

Video Inkjet Packaging Lines S7-15 (MDE Reg. No. 6-2018)

Good operating practices information as required by COMAR 26.11.19.02I shall be made available to the Department upon request.

VOC Leak inspection logs as required by COMAR 26.11.19.16 shall be made available to the Department upon request.

Packaging Adhesive Fugitive lines only S7-16 (MDE Reg. No. 510-0314-9-1298)

The Permittee shall report all occurrences of excess emissions to the Department. **[Reference: COMAR 26.11.01.07]**

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Emission Units: **D3-6 thru D3-11**

Ion Exchange System

D3-6: Scrubber (25-gpm once through).

D3-6A: HCl Tank (8450-gallons equipped with scrubber D3-6).

D3-7: Resin Acid Wash Tank (12,924 gallons).

D3-8: Clean in Place (CIP) Tank (734 gallons).

D3-9A, B, C, D: Four (4) Deashing Resin Beds (10, 574 gallons each).

D3-10A, B, C, D: Four (4) Decolorized Resin Beds (23,603 gallons each).

D3-11A, B: Two (2) salt saturators controlled by water spray chamber (D3-11).

D3-12: HCl equipment leak components (valves/pumps/ connectors).

(MDE Reg. No. 510-0314-8-0386).

Compliance Status

During the 2022 full compliance report, the refinery was in full operation. Records of HCl and salt throughput have been maintained onsite and are submitted annually with the Emission Certification Report.

Applicable Standards/Limits

A. Control of Visible Emissions

COMAR 26.11.06.02 - Visible Emission Standards.

C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”

A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

(a) The visible emissions are not greater than 40 percent opacity; and

(b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”

Compliance Demonstration

The Permittee shall maintain at the facility for at least five (5) years and make them available to the Department upon request records necessary to support annual certifications of emissions. **[Reference: COMAR 26.11.03.06C]**

The Permittee shall submit to the Department by April 1 of each year a certification of emissions for the previous calendar year.

The Permittee shall report all occurrences of excess emissions to the Department. **[Reference: COMAR 26.11.01.07]**

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B. Control of Particulate Matter

COMAR 26.11.06.03B - Particulate Matter from Confined Sources.

“(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”

COMAR 26.11.06.03C - Particulate Matter from Unconfined Sources.

“(1) A person may not cause or permit emissions from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions. In making this determination, the Department shall consider technological feasibility, practicality, economic impact, and the environmental consequences of the decision.”

COMAR 26.11.06.03D - Particulate Matter from Materials Handling and Construction.

“A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:

- (1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts.
- (3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.
- (4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would covering the vehicles.
- (5) The paving of roadways and their maintenance in clean condition.
- (6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water.”

Compliance Demonstration

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (a) Annual HCl throughput for each tank and resin bed.
- (b) Annual salt throughput for each salt saturator.

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(c) All written descriptions of “good operating practices” designed to minimize emissions of HAP.

(d) HAP leak detection and repair logs that include identification of the persons who conducted the leak detection inspections, the dates on which the inspections were conducted, the findings during the inspections, a listing by tag identification number and a description of all leaks discovered, and the date and nature of all leak repairs effected.

[Reference: MDE Permit to Construct No. 510-0314-8-0386 (November 18, 2013)]

The Permittee shall submit to the Department by April 1 of each year a certification of emissions for the previous calendar year.

The Permittee shall report all occurrences of excess emissions to the Department. **[Reference: COMAR 26.11.01.07]**

Emission Units: **S1, S2, S3 & S4**

S1, S2, S3, S4: Four (4) 3.75-million-pound sugar storage silos equipped with bin vents (BV-1, BV-2, BV-3, BV-4) [MDE Reg. No. 510-0314-8-0411]. Permit to Construct issued Feb 25, 2021.

Compliance Status

During the 2022 full compliance report, the refinery was in full operation. As of the EPA six-month reporting period (July 1, 2022, through Dec 31, 2022), the four silos are partially completed as work is still being done on the interior. The Permittee reported via email dated September 5, 2023, that the source is now operational. The operational timelines are as follows: Sugar trial start date: 6/23, Sugar Trial end date: 7/10, First silo in service: 7/10, All four in service: 9/1.

Applicable Standards/Limits

A. Control of Visible Emissions

COMAR 26.11.06.02 - Visible Emission Standards.

C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”

A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”

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Compliance Demonstration

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

The Permittee shall maintain at the facility for at least five (5) years and make them available to the Department upon request, records of the following:

- (1) A record of the results of the monthly inspections and the log of inspection and maintenance.
- (2) A log with records of the dates and description of maintenance activities performed. **[Reference: COMAR 26.11.03.06C]**

The Permittee shall report, in accordance with the requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Administration. **[Reference: COMAR 26.11.01.07]**

B. Control of Particulate Matter

COMAR 26.11.06.03B - Particulate Matter from Confined Sources.

“(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”

COMAR 26.11.06.03D - Particulate Matter from Materials Handling and Construction.

“A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:

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- (1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts.
- (3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.
- (4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would covering the vehicles.
- (5) The paving of roadways and their maintenance in clean condition.
- (6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water."

Compliance Demonstration

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request: (1) a copy of the preventative maintenance plan for each of the bin vents; (2) records of the bin vent malfunctions, and corrective actions taken to bring it back into proper operation; and (3) a log with records of the dates and description of maintenance activities performed. **[Reference: COMAR 26.11.03.06C]**

COMPLIANCE SCHEDULE

American Sugar Refining, Inc. is currently in compliance with all applicable air quality regulations.

TITLE IV – ACID RAIN

Not Applicable.

TITLE VI – OZONE DEPLETING SUBSTANCES

American Sugar Refining, Inc is not subject to Title VI requirements.

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SECTION 112(r) – ACCIDENTAL RELEASE

American Sugar Refining, Inc is not subject to the requirements of Section 112(r).

PERMIT SHIELD

The American Sugar Refining, Inc facility requested that a permit shield be expressly included in the Permittee's Part 70 permit. Permit shields are granted on an emission unit by emission unit basis. If an emission unit is covered by a permit shield, a permit shield statement will follow the emission unit table in Section IV - Plant Specific Conditions of the permit. In this case, a permit shield was granted for each emission unit covered by the permit.

INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

- (1) No. 1 Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

The 250-kW emergency generator is subject to the following requirements:

Emissions Unit Number(s): Emergency Generator

U11-2: 250-kW Emergency Generator. [MDE Reg. 9-1293]. Installed 2020.

Applicable Standards/Limits:

A. Control of Visible Emissions

COMAR 26.11.09.05E – Stationary Internal Combustion Engine Powered Equipment.

“(2) Emissions During Idle Mode. A person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.

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Emissions Unit Number(s): Emergency Generator

U11-2: 250-kW Emergency Generator. [MDE Reg. 9-1293]. Installed 2020.

(3) Emissions During Operating Mode. A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.

(4) Exceptions.

(a) Section E(2) of this regulation does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.

(b) Section E(2) of this regulation does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:

(i) Engines that are idled continuously when not in service: 30 minutes;

(ii) All other engines: 15 minutes.

(c) Section E(2) and (3) of this regulation do not apply while maintenance, repair, or testing is being performed by qualified mechanics.”

B. Control of Sulfur Oxides Emission

COMAR 26.11.09.07A(2) – Control of Sulfur Oxides from fuel burning equipment. “A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: In Areas III and IV: **(b) Distillate fuel oil, 0.3 percent.**”

C. Control of Nitrogen Oxides Emission

COMAR 26.11.09.08G. - Requirements for Fuel-Burning Equipment with a Capacity Factor of 15 Percent or Less, and Combustion Turbines with a Capacity Factor Greater than 15 Percent.

“(1) A person who owns or operates fuel-burning equipment with a capacity factor (as defined in 40 CFR Part 72.2) of 15 percent or less shall:

(a) Provide certification of the capacity factor of the equipment to the Department in writing;

(b) For fuel-burning equipment that operates more than 500 hours during a calendar year, perform a combustion analysis and optimize combustion at least once annually;

(c) Maintain the results of the combustion analysis at the site for at least 2 years and make these results available to the Department and the EPA upon request;

(d) Require each operator of an installation, except combustion turbines, to attend operator training programs at least once every 3 years, on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and

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Emissions Unit Number(s): Emergency Generator

U11-2: 250-kW Emergency Generator. [MDE Reg. 9-1293]. Installed 2020.

(e) Maintain a record of training program attendance for each operator at the site and make these records available to the Department upon request."

D. Control of HAPs

Subpart III—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

§60.4200 - Am I subject to this subpart?

(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons as specified in paragraphs (a)(1) through (4) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

(1) Manufacturers of stationary CI ICE with a displacement of less than 30 liters per cylinder where the model year is: 2007 or later, for engines that are not fire pump engines.

§60.4205 - What emission standards must I meet for emergency engines if I am an owner or operator of a stationary CI internal combustion engine?

(b) Owners and operators of 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new nonroad CI engines in § 60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE.

Note: The Permittee shall satisfy the requirements above and §60.4202 by purchasing and installing engines certified at EPA Tier 2 or better.

§60.4207 - What fuel requirements must I meet if I am an owner or operator of a stationary CI internal combustion engine subject to this subpart?

(b) Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted.

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Emissions Unit Number(s): Emergency Generator

U11-2: 250-kW Emergency Generator. [MDE Reg. 9-1293]. Installed 2020.

§60.4209 - What are the monitoring requirements if I am an owner or operator of a stationary CI internal combustion engine?

If you are an owner or operator, you must meet the monitoring requirements of this section. In addition, you must also meet the monitoring requirements specified in § 60.4211.

(a) If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.

(b) If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in § 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.

§60.4211 - What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?

(a) If you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under paragraph (g) of this section:

(1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;

(2) Change only those emission-related settings that are permitted by the manufacturer; and

(3) Meet the requirements of 40 CFR part 1068, as they apply to you.

(c) If you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in §60.4204(b) or §60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to this subpart and must comply with the emission standards specified in §60.4205(c), you must comply by purchasing an engine certified to the emission standards in §60.4204(b), or §60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power.

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Emissions Unit Number(s): Emergency Generator

U11-2: 250-kW Emergency Generator. [MDE Reg. 9-1293]. Installed 2020.

The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in paragraph (g) of this section.

(f) If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (f)(1) through (3) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, and operation in nonemergency situations for 50 hours per year, as described in paragraphs (f)(1) through (3), is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (3), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

- (1) There is no time limit on the use of emergency stationary ICE in emergency situations.
- (2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (f)(2)(i) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (f)(3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).
 - (i) Emergency stationary ICE may be operated 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 beyond 100 hours per calendar year.
 - (ii) –(iii) [Reserved]

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Emissions Unit Number(s): Emergency Generator

U11-2: 250-kW Emergency Generator. [MDE Reg. 9-1293]. Installed 2020.

- (3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraph (f)(3)(i) of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
- (i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
- (A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
 - (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - (C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - (D) The power is provided only to the facility itself or to support the local transmission and distribution system.
 - (E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
- (ii) [Reserved]

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Emissions Unit Number(s): Emergency Generator

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§60.4214 - What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary CI internal combustion engine?

(d) If you own or operate an emergency stationary CI ICE with a maximum engine power more than 100 HP that operates for the purpose specified in § 60.4211(f)(3)(i), you must submit an annual report according to the requirements in paragraphs (d)(1) through (3) of this section.

(1) The report must contain the following information:

(i) Company name and address where the engine is located.

(ii) Date of the report and beginning and ending dates of the reporting period.

(iii) Engine site rating and model year.

(iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.

(v)-(vi) [Reserved]

(vii) Hours spent for operation for the purposes specified in § 60.4211(f)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in § 60.4211(f)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

40 CFR 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

§63.6590 - What parts of my plant does this subpart cover?

“(c) *Stationary RICE subject to Regulations under 40 CFR Part 60.* An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

(1) A new or reconstructed stationary RICE located at an area source;”

(2) ✓ Space heaters utilizing direct heat transfer and used solely for comfort heat;

(3) No. 5 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

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The affected units are subject to COMAR 26.11.19.09D, which requires that the Permittee control emissions of volatile organic compounds (VOC) from cold degreasing operations by meeting the following requirements:

- (a) COMAR 26.11.19.09D(2)(b), which establishes that the Permittee shall not use any VOC degreasing material that exceeds a vapor pressure of 1 mm Hg at 20 ° C;
- (b) COMAR 26.11.19.09D(3)(a—d), which requires that the Permittee implement good operating practices designed to minimize spills and evaporation of VOC degreasing material. These practices, which shall be established in writing and displayed such that they are clearly visible to operators, shall include covers (including water covers), lids, or other methods of minimizing evaporative losses, and reducing the time and frequency during which parts are cleaned;
- (c) COMAR 26.11.19.09D(4), which prohibits the use of any halogenated VOC for cold degreasing.

The Permittee shall maintain on site for at least five (5) years, and shall make available to the Department upon request, the following records of operating data:

- (a) Monthly records of the total VOC degreasing materials used; and
- (b) Written descriptions of good operating practices designed to minimize spills and evaporation of VOC degreasing materials.

(4) Containers, reservoirs, or tanks used exclusively for:

- (a) ✓ Storage of butane, propane, or liquefied petroleum, or natural gas;
- (b) No. 4 Storage of lubricating oils;
- (c) No. 2 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;

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- (d) No. 1 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;
- (5) ✓ Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a total cooking area of 5 square feet (0.46 square meter) or less;
- (6) ✓ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;
- (7) ✓ Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;
- (8) ✓ Laboratory fume hoods and vents;

For the following, attach additional pages as necessary:

- (9) any other emissions unit, not listed in this section, with a potential to emit less than the "de minimus" levels listed in COMAR 26.11.02.10X (list and describe units):

No. 2 Aerosol can puncture equipment. _____

No. 1 Maintenance welding (U11-3) _____

No. 1 Maintenance steel cutting (U11-4) _____

STATE ONLY ENFORCEABLE REQUIREMENTS

This section of the permit contains state-only enforceable requirements. The requirements in this section will not be enforced by the U.S. Environmental

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Protection Agency. The requirements in this section are not subject to COMAR 26.11.03 10 - Public Petitions for Review to EPA Regarding Part 70 Permits.

1. Applicable Regulations:

(A) **COMAR 26.11.06.08 - Nuisance.**

"An installation or premises may not be operated or maintained in such a manner that a nuisance or air pollution is created. Nothing in this regulation relating to the control of emissions may in any manner be construed as authorizing or permitting the creation of, or maintenance of, nuisance or air pollution."

(B) **COMAR 26.11.06.09 - Odors.**

"A person may not cause or permit the discharge into the atmosphere of gases, vapors, or odors beyond the property line in such a manner that a nuisance or air pollution is created."

(C) **COMAR 26.11.15.05, Control Technology Requirements.**

"A person who complies with the ambient impact requirement in Regulation .06 of this chapter may not be affected by the amount of the installation's stack height that exceeds good engineering practice (GEP), or by any other dispersion technique.

Unless an existing installation is controlled using T-BACT, the degree of emission limitation required in order to demonstrate compliance with Regulation .06 of this chapter may not be affected by the amount of the installation's stack height that exceeds good engineering practice (GEP), or by any other dispersion technique."

(D) **COMAR 26.11.15.06, Ambient Impact Requirement – Requirements for Existing Installations, Sources, or Premises.**

1) "Except as provided in §B(3) of this regulation, a person may not cause or permit the discharge of a toxic air pollutant listed in COMAR 26.11.16.07 from an existing installation or source if total allowable emissions of that TAP from the premises will unreasonably endanger human health.

2) A person shall demonstrate compliance with §B(1) of this regulation using the procedures established in Regulation .07 of this chapter and COMAR 26.11.16.

3) A person who owns or operates an existing premises shall meet the requirements of §B(1) and (2) of this regulation for each TAP listed in COMAR 26.11.16.07 by the applicable compliance dates listed in COMAR 26.11.16.07, or not later than 2 years after becoming subject to this chapter, whichever is later."

2. Record Keeping and Reporting:

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The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

- (a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or
- (b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

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SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

American Sugar Refining, Inc. (ASR) operates a sugar manufacturing plant which produces granulated and confectioner's sugars from raw cane sugar in bulk quantities and in various package sizes. The facility also manufactures bulk quantities of liquid cane sugars and syrups for industrial consumption. The sugar manufacturing process consists of two principal processes: decolorization and sugar production. The facility also operates a centralized steam and electrical cogeneration energy production facility (powerhouse). There are four (4) boilers (130 million Btu/hr. each) which fire natural gas and that fire fuel oil (No. 2 or No. 6) in curtailment and testing situations. There is also one (1) boiler which will be rated at 300 million Btu/hr. that burns natural gas only.

The sugar manufacturing plant is located at 1100 Key Highway East in Baltimore, Maryland. The primary SIC code for this facility is 2062, sugar cane refining.

2. FACILITY INVENTORY LIST

Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
C1 thru C4	5-1444 thru 5-1447	Four (4) Combustion Engineering Boilers, each rated at 130 million Btu/hr. firing natural gas and No. 2 fuel oil. Boilers 1 thru 4.	1966; Modified 6/12/2012
C6	5-1476	One (1) Babcock & Wilcox boiler rated at 300 million Btu/hr. firing natural gas and equipped with a low-NO _x burner and flue gas recirculation.	July 2000; Modified 1/18/2013 and 2018
R29-1	6-3091	Raw Sugar Unloading and Conveying. Modified 2021: additional equipment for transfer of raw sugar – Old Sugar Shed Conveyance system to/from Storage Barge. [PTC issued Aug 5, 2021]	Aug 2021
R29-3	N/A	Melter Feed	1971
R29-4	N/A	Diatomite Fugitives	1971
S7B-2	8-0212	Bin Tower Rejects Box	1966
S7-12	8-0266	Maltodex Supersak Unloading System	1982
S7-13	N/A	Remelt Shredder Fugitives	1989
S7-14	8-0223	Magnets Tailing Fugitives	1966
D28-1	8-0301	Carbonatation Process – Lime silo equipped with a baghouse	1995

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Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
D10-1, 2, 3	8-0301	Carbonatation Process – Saturators demisters (RP-C-1, -2, -3, respectively) and controlled by a Ducon Flue Gas Scrubber.	1995
D2-1		Mud Loading	1964
D3-5	N/A	Char Filtration Process – Celite Fugitives	
U5-1	8-0383	Cooling Tower CT-3	Unknown
S5-1	8-0226	Scrap melter equipped with a Rotoclone scrubber (RP-C-1)	1922
S5-2	8-0382	Scrap melter	1991
S5-3		Remelt Screw Conveyors	1991
S5-4	6-2022	Invert System with a Rotoclone [S5-4A: Invert Cloudy Tank; S5-4B: Invert Precoat Tank; S5-4C: Surcose Cloudy Tank; S5-4D: Surcose Precoat Tank; S5-4E: Clear Surcose Tank; S5-4F: Clear Invert Tank]	1958
S5-5		Caustic fugitives associated with the invert System	1958
S5-6	6-2020	Soft Sugar Shredder	1969
S5-8A-B	8-0332	Two (2) Dryers (Powdered Specialty Sugars) each equipped with venturi scrubbers (DW-1) (RP-C-33), DW-2 (RP-C-34), respectively.	Feb 2004
S5-8D		Liquid Sugar Cooler (Powdered Specialty Sugars) controlled by Sly Venturi Scrubber (WS-1) (RP-C-35).	Feb 2004
S5-8E		Three (3) Centrifugal Separators controlled by Sly Venturi Scrubber (WS-1) (RP-C-36)	Feb 2004
S5-8F		Washout Tanks and Beater controlled by a Rotoclone.	Feb 2004
S5-8G		Packaging and Conveying Equipment controlled by Sly Venturi Scrubber (WS-1) (RP-C-36)	Feb 2004
S1-1	8-0320	FEECO Rotary sugar dryer equipped with Entolater vortex scrubber (RP-C-15)	1999
S7A-1	8-0212	Bulk Sugar Conveying System controlled by a scrubber (RP-C-25) [S7A-RE1: Bucket Elevator RE-1; S7A-XE1: Bucket Elevator XE-1; S7A-XRS1: Bucket Elevator XRS-1; S7A-UE1: Bucket Elevator UE-1; S7A-UE2A: Bucket Elevator UE-2A; S7A-UE2B: Bucket Elevator UE-2B;	1966

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Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
		S7A-RE2: Bucket Elevator RE-2; S7A-U1: Storage Bin U1; S7A-U2: Storage Bin U2; S7A-U3: Storage Bin U3; S7A-U4: Storage Bin U4; S7A-U5: Storage Bin U5; S7A-U6: Storage Bin U6; S7A-XF1: Storage Bin XF-1; S7A-XF2: Storage Bin XF-2; S7A-V1: Storage Bin V1; S7A-V2: Storage Bin V2; S7A-V3: Storage Bin V3; S7A-V4: Storage Bin V4; S7A-V5: Storage Bin V5; S7A-V6: Storage Bin V6; S7A-C1: Storage Bin C1; S7A-F1: Storage Bin F1; S7A-AR1: Storage Bin AR1; S7A-AR2: Storage Bin AR2; S7A-AR3: Storage Bin AR3; S7A-AR4: Storage Bin AR4; S7A-AR5: Storage Bin AR5; S7A-AR6: Storage Bin AR6; S7A-AR7: Storage Bin AR7; S7A-AR8: Storage Bin AR8; S7A-RJX: Screw Conveyor Rejects.	
S7-5, S7-6, S7-7	8-0265	Packaging Feed Tanks each equipped with a filter (RP-C-26, -27, & -28, respectively)	Jan 2001
S7-8		Packaging Operations controlled by Rotoclone 7-6-1 (RP-C-29) [S7-8A: Fawema Packaging System; S7-8B: Paxall Packaging System; S7-8C: Clouds Packaging System; S7-8D: Handi Pak System]	Jan 2001
S7-10		Packaging System controlled by a Wheelabrator dust collector (7-5-1) (RP-C-32) [S7-10A: Hesser Bagging System; S7-10B: Supersack Unloading System]	Jan 2001
S7B-1	8-0223	Bulk Loading System with an Entoleter scrubber (RP-C-31) and DCL UN800 Dust Collectors	1966; Modified Feb 2016
S7-11	8-0287	Supersack Sugar Packing Line controlled by Wheelabrator dust collectors.	1990

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Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
		[S7-11A: Thiele Supersack system; S7-11B: Tub Packaging Line controlled by Wheelabrator 7-5-2 (RP-C-30); S7-11C: Simplex Packaging Line controlled by a Wheelabrator dust collector 6-5-1 (RP-C-12)]	
S6-4	8-0115	BMA Granulator equipped with Rotoclone (RP-C-11)	1969
S6-5	8-0225	Sugar Packaging Line and Conveying System controlled by a Wheelabrator dry filter (6-5-1) (RP-C-12) [S6-5A: Remelt Shredder; S6-5B: Maltrin Tank; S6-5C: Sugar Tank; S6-5D: MFB Feeder; S6-5E-G: 3 Sugar Feed to Mills 1, 2, & 3; S6-5H: 6-5-1200 Receiver; S6-5I: UB-1 South Hood; S6-5J: UB-1 Tail End]	Nov 2008; Modified Apr 2021
S6-6	8-0115	Sugar Packaging Line and Conveying System controlled by a Wheelabrator dry filter (6-5-2) (RP-C-13) [S6-6A: Oscillator; S6-6B: DSE-1; S6-6C: US-2 Scroll; S6-6D: UB-1 North]	Nov 2008
S6-7	8-0296 / 8-0409	Sugar Packaging Line and Conveying System controlled by a Wheelabrator dry filter (6-5-3) (RP-C-14) [S6-7A: Receiver 1300 2#; S6-7B: Old V-Bag Packaging System; S6-7C: Receiver 1250; S6-7D: Receiver 6-4-1300; S6-7E: 2# Poly Filler System; S6-7F: New V.B. Filler System; S6-7G: Old V.B Filler System; S6-7H: Packet Grinder; S6-7I: 1-4 10X Filler System; S6-7J: Bulkline (Supersack) Packaging Line – June 2020 – MDE Reg. 510-0314-8-0409]	Nov 2008 / Jun 2020; Modified Apr. 2021
S6-1	8-0209	Sugar Mill 1 equipped with MAC dry filer (RP-C-16)	Nov 2008
S6-1A		Starch Receiver 1 equipped with dry filer (RP-C-17)	Nov 2008

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Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
S6-2		Sugar Mill 2 equipped with MAC dry filer (RP-C-18)	Nov 2008
S6-2A		Starch Receiver 2 equipped with dry filer (RP-C-19)	Nov 2008
S6-3	8-0125	Sugar Mill 3 equipped with MAC dry filer (RP-C-20)	Nov 2008
S6-3A		Starch Receiver 3 equipped with dry filer (RP-C-21)	Nov 2008
S6-8	8-0266	Sugar Pulverizer (Mill 7) equipped with Mikropul baghouse (RP-C-24)	1988
S6-9	8-0209	Starch Bin equipped with vent filter (RP-C-22)	Nov 2008
S5-7	6-2021	Ten (10) Evaporation Pans (#1-9, 11)	1950
S7-15	6-2018	Packaging Video Inkjet Printers	1990
S7-16	9-1298	Packaging Adhesives Fugitives: additional adhesive (H.B. Fuller – Swift@Tak 5948-00) for substitution of original adhesives.	1990; Mod. 2022
D3-6	8-0386	Ion Exchange System: Scrubber (25-gpm once-through)	2013
D3-6A		HCl Tank (8,450-gallons) equipped with scrubber D3-6	
D3-7		Resin Acid Wash Tank (12,924-gallons)	
D3-8		Clean in Place (CIP) Tank (734-gallons)	
D3-9A, B, C, D		Four (4) Deashing Resin Beds (10,574-gallon, each)	
D3-10A, B, C, D		Four (4) Decolorized Resin Beds (23,603-gallons, each)	
D3-11A, B		Two (2) Salt saturators controlled by water spray chamber (D3-11)	
D3-12		HCl equipment leak components (valves, pumps, connectors)	
U11-2	9-1293	250-kW Emergency Generator	2020
S1, S2, S3 & S4	8-0411	Four (4) 3.75-million-pound sugar storage silos equipped with bin vents (BV-1, BV-2, BV-3, BV-4) [PTC issued Feb 25, 2021]	2021

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SECTION II GENERAL CONDITIONS

1. DEFINITIONS

[COMAR 26.11.01.01] and [COMAR 26.11.02.01]

The words or terms in this Part 70 permit shall have the meanings established under COMAR 26.11.01 and .02 unless otherwise stated in this permit.

2. ACRONYMS

ARA	Air and Radiation Administration
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEM	Continuous Emissions Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMAR	Code of Maryland Regulations
EPA	United States Environmental Protection Agency
FR	Federal Register
gr	grains
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
MDE	Maryland Department of the Environment
MVAC	Motor Vehicle Air Conditioner
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OTR	Ozone Transport Region
PM	Particulate Matter
PM10	Particulate Matter with Nominal Aerodynamic Diameter of 10 micrometers or less
ppm	parts per million
ppb	parts per billion
PSD	Prevention of Significant Deterioration
PTC	Permit to construct
PTO	Permit to operate (State)
SIC	Standard Industrial Classification

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SO ₂	Sulfur Dioxide
TAP	Toxic Air Pollutant
tpy	tons per year
VE	Visible Emissions
VOC	Volatile Organic Compounds

3. EFFECTIVE DATE

The effective date of the conditions in this Part 70 permit is the date of permit issuance, unless otherwise stated in the permit.

4. PERMIT EXPIRATION

[COMAR 26.11.03.13B(2)]

Upon expiration of this permit, the terms of the permit will automatically continue to remain in effect until a new Part 70 permit is issued for this facility provided that the Permittee has submitted a timely and complete application and has paid applicable fees under COMAR 26.11.02.16.

Otherwise, upon expiration of this permit the right of the Permittee to operate this facility is terminated.

5. PERMIT RENEWAL

[COMAR 26.11.03.02B(3)] and [COMAR 26.11.03.02E]

The Permittee shall submit to the Department a completed application for renewal of this Part 70 permit at least 12 months before the expiration of the permit. Upon submitting a completed application, the Permittee may continue to operate this facility pending final action by the Department on the renewal.

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information no later than 10 days after becoming aware that this occurred. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a completed application was submitted, but prior to the release of a draft permit. This

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information shall be submitted to the Department no later than 20 days after a new requirement has been adopted.

6. CONFIDENTIAL INFORMATION

[COMAR 26.11.02.02G]

In accordance with the provisions of the State Government Article, Sec. 10-611 et seq., Annotated Code of Maryland, all information submitted in an application shall be considered part of the public record and available for inspection and copying, unless the Permittee claims that the information is confidential when it is submitted to the Department. At the time of the request for inspection or copying, the Department will make a determination with regard to the confidentiality of the information. The Permittee, when requesting confidentiality, shall identify the information in a manner specified by the Department and, when requested by the Department, promptly provide specific reasons supporting the claim of confidentiality. Information submitted to the Department without a request that the information be deemed confidential may be made available to the public. Subject to approval of the Department, the Permittee may provide a summary of confidential information that is suitable for public review. The content of this Part 70 permit is not subject to confidential treatment.

7. PERMIT ACTIONS

[COMAR 26.11.03.06E(3)] and [COMAR 26.11.03.20(A)]

This Part 70 permit may be revoked or reopened and revised for cause. The filing of an application by the Permittee for a permit revision or renewal; or a notification of termination, planned changes or anticipated noncompliance by the facility, does not stay a term or condition of this permit.

The Department shall reopen and revise, or revoke the Permittee's Part 70 permit under the following circumstances:

- a. Additional requirements of the Clean Air Act become applicable to this facility and the remaining permit term is 3 years or more;

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- b. The Department or the EPA determines that this Part 70 permit contains a material mistake, or is based on false or inaccurate information supplied by or on behalf of the Permittee;
- c. The Department or the EPA determines that this Part 70 permit must be revised or revoked to assure compliance with applicable requirements of the Clean Air Act; or
- d. Additional requirements become applicable to an affected source under the Federal Acid Rain Program.

8. PERMIT AVAILABILITY

[COMAR 26.11.02.13G]

The Permittee shall maintain this Part 70 permit in the vicinity of the facility for which it was issued, unless it is not practical to do so, and make this permit immediately available to officials of the Department upon request.

9. REOPENING THE PART 70 PERMIT FOR CAUSE BY THE EPA

[COMAR 26.11.03.20B]

The EPA may terminate, modify, or revoke and reissue a permit for cause as prescribed in 40 CFR §70.7(g)

10. TRANSFER OF PERMIT

[COMAR 26.11.02.02E]

The Permittee shall not transfer this Part 70 permit except as provided in COMAR 26.11.03.15.

11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS

[COMAR 26.11.03.14] and [COMAR 26.11.03.06A(8)]

- a. The Permittee shall submit an application to the Department to revise this Part 70 permit when required under COMAR 26.11.03.15 -.17.

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- b. When applying for a revision to a Part 70 permit, the Permittee shall comply with the requirements of COMAR 26.11.03.02 and .03 except that the application for a revision need include only information listed that is related to the proposed change to the source and revision to the permit. This information shall be sufficient to evaluate the proposed change and to determine whether it will comply with all applicable requirements of the Clean Air Act.
- c. The Permittee may not change any provision of a compliance plan or schedule in a Part 70 permit as an administrative permit amendment or as a minor permit modification unless the change has been approved by the Department in writing.
- d. A permit revision is not required for a change that is provided for in this permit relating to approved economic incentives, marketable permits, emissions trading, and other similar programs.

12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS

[COMAR 26.11.03.17]

The Permittee may apply to the Department to make a significant modification to its Part 70 Permit as provided in COMAR 26.11.03.17 and in accordance with the following conditions:

- a. A significant modification is a revision to the federally enforceable provisions in the permit that does not qualify as an administrative permit amendment under COMAR 26.11.03.15 or a minor permit modification as defined under COMAR 26.11.03.16.
- b. This permit does not preclude the Permittee from making changes, consistent with the provisions of COMAR 26.11.03, that would make the permit or particular terms and conditions of the permit irrelevant, such as by shutting down or reducing the level of operation of a source or of an emissions unit within the source. Air pollution control equipment shall not be shut down or its level of operation reduced if doing so would violate any term of this permit.
- c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal,

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including the requirements for applications, public participation, and review by affected states and EPA, except:

- (1) An application need include only information pertaining to the proposed change to the source and modification of this permit, including a description of the change and modification, and any new applicable requirements of the Clean Air Act that will apply if the change occurs;
 - (2) Public participation, and review by affected states and EPA, is limited to only the application and those federally enforceable terms and conditions of the Part 70 permit that are affected by the significant permit modification.
- d. As provided in COMAR 26.11.03.15B(5), an administrative permit amendment may be used to make a change that would otherwise require a significant permit modification if procedures for enhanced preconstruction review of the change are followed that satisfy the requirements of 40 CFR 70.7(d)(1)(v).
 - e. Before making a change that qualifies as a significant permit modification, the Permittee shall obtain all permits-to-construct and approvals required by COMAR 26.11.02.
 - f. The Permittee shall not make a significant permit modification that results in a violation of any applicable requirement of the Clean Air Act.
 - g. The permit shield in COMAR 26.11.03.23 applies to a final significant permit modification that has been issued by the Department, to the extent applicable under COMAR 26.11.03.23.

13. MINOR PERMIT MODIFICATIONS

[COMAR 26.11.03.16]

The Permittee may apply to the Department to make a minor modification to the federally enforceable provisions of this Part 70 permit as provided in COMAR 26.11.03.16 and in accordance with the following conditions:

- a. A minor permit modification is a Part 70 permit revision that:

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- (1) Does not result in a violation of any applicable requirement of the Clean Air Act;
- (2) Does not significantly revise existing federally enforceable monitoring, including test methods, reporting, record keeping, or compliance certification requirements except by:
 - (a) Adding new requirements,
 - (b) Eliminating the requirements if they are rendered meaningless because the emissions to which the requirements apply will no longer occur, or
 - (c) Changing from one approved test method for a pollutant and source category to another;
- (3) Does not require or modify a:
 - (a) Case-by-case determination of a federally enforceable emissions standard,
 - (b) Source specific determination for temporary sources of ambient impacts, or
 - (c) Visibility or increment analysis;
- (4) Does not seek to establish or modify a federally enforceable permit term or condition for which there is no corresponding underlying applicable requirement of the Clean Air Act, but that the Permittee has assumed to avoid an applicable requirement to which the source would otherwise be subject, including:
 - (a) A federally enforceable emissions standard applied to the source pursuant to COMAR 26.11.02.03 to avoid classification as a Title I modification; and
 - (b) An alternative emissions standard applied to an emissions unit pursuant to regulations promulgated under Section 112(i)(5) of the Clean Air Act
- (5) Is not a Title I modification; and

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- (6) Is not required under COMAR 26.11.03.17 to be processed as a significant modification to this Part 70 permit.

b. Application for a Minor Permit Modification

The Permittee shall submit to the Department an application for a minor permit modification that satisfies the requirements of COMAR 26.11.03.03 which includes the following:

- (1) A description of the proposed change, the emissions resulting from the change, and any new applicable requirements that will apply if the change is made;
- (2) The proposed minor permit modification;
- (3) Certification by a responsible official, in accordance with COMAR 26.11.02.02F, that:
 - (a) The proposed change meets the criteria for a minor permit modification, and
 - (b) The Permittee has obtained or applied for all required permits-to-construct required by COMAR 26.11.03.16 with respect to the proposed change;
- (4) Completed forms for the Department to use to notify the EPA and affected states, as required by COMAR 26.11.03.07-.12.

c. Permittee's Ability to Make Change

- (1) For changes proposed as minor permit modifications to this permit that will require the applicant to obtain a permit to construct, the permit to construct must be issued prior to the new change.
- (2) During the period of time after the Permittee applies for a minor modification but before the Department acts in accordance with COMAR 26.11.03.16F(2):
 - (a) The Permittee shall comply with applicable requirements of the Clean Air Act related to the change and the permit terms and conditions described in the application for the minor modification.

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- (b) The Permittee is not required to comply with the terms and conditions in the permit it seeks to modify. If the Permittee fails to comply with the terms and conditions in the application during this time, the terms and conditions of both this permit and the application for modification may be enforced against it.
- d. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.16 is not within the scope of this regulation.
- e. Minor permit modification procedures may be used for Part 70 permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, but only to the extent that the minor permit modification procedures are explicitly provided for in regulations approved by the EPA as part of the Maryland SIP or in other applicable requirements of the Clean Air Act.

14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS

[COMAR 26.11.03.15]

The Permittee may apply to the department to make an administrative permit amendment as provided in COMAR 26.11.03.15 and in accordance with the following conditions:

- a. An application for an administrative permit amendment shall:
 - (1) Be in writing;
 - (2) Include a statement certified by a responsible official that the proposed amendment meets the criteria in COMAR 26.11.03.15 for an administrative permit amendment, and
 - (3) Identify those provisions of this part 70 permit for which the amendment is requested, including the basis for the request.
- b. An administrative permit amendment:
 - (1) Is a correction of a typographical error;

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- (2) Identifies a change in the name, address, or phone number of a person identified in this permit, or a similar administrative change involving the Permittee or other matters which are not directly related to the control of air pollution;
 - (3) requires more frequent monitoring or reporting by the Permittee;
 - (4) Allows for a change in ownership or operational control of a source for which the Department determines that no other revision to the permit is necessary and is documented as per COMAR 26.11.03.15B(4);
 - (5) Incorporates into this permit the requirements from preconstruction review permits or approvals issued by the Department in accordance with COMAR 26.11.03.15B(5), but only if it satisfies 40 CFR 70.7(d)(1)(v);
 - (6) Incorporates any other type of change, as approved by the EPA, which is similar to those in COMAR 26.11.03.15B(1)—(4);
 - (7) Notwithstanding COMAR 26.11.03.15B(1)—(6), all modifications to acid rain control provisions included in this Part 70 permit are governed by applicable requirements promulgated under Title IV of the Clean Air Act; or
 - (8) Incorporates any change to a term or condition specified as State-only enforceable if the Permittee has obtained all necessary permits-to-construct and approvals that apply to the change.
- c. The Permittee may make the change addressed in the application for an administrative amendment upon receipt by the Department of the application if all permits-to-construct or approvals otherwise required by COMAR 26.11.02 prior to making the change have first been obtained from the Department.
- d. The permit shield in COMAR 26.11.03.23 applies to administrative permit amendments made under Section B(5) of COMAR 26.11.03.15 , but only after the Department takes final action to revise the permit.

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- e. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.15 is not within the scope of this regulation.

15. OFF-PERMIT CHANGES TO THIS SOURCE

[COMAR 26.11.03.19]

The Permittee may make off-permit changes to this facility as provided in COMAR 26.11.03.19 and in accordance with the following conditions:

- a. The Permittee may make a change to this permitted facility that is not addressed or prohibited by the federally enforceable conditions of this Part 70 permit without obtaining a Part 70 permit revision if:
 - (1) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;
 - (2) The change is not subject to any requirements under Title IV of the Clean Air Act;
 - (3) The change is not a Title I modification; and
 - (4) The change does not violate an applicable requirement of the Clean Air Act or a federally enforceable term or condition of the permit.
- b. For a change that qualifies under COMAR 26.11.03.19, the Permittee shall provide contemporaneous written notice to the Department and the EPA, except for a change to an emissions unit or activity that is exempt from the Part 70 permit application, as provided in COMAR 26.11.03.04. This written notice shall describe the change, including the date it was made, any change in emissions, including the pollutants emitted, and any new applicable requirements of the Clean Air Act that apply as a result of the change.
- c. Upon satisfying the requirements of COMAR 26.11.03.19, the Permittee may make the proposed change.
- d. The Permittee shall keep a record describing:

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- (1) Changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement of the Clean Air Act , but not otherwise regulated under this permit; and
- (2) The emissions resulting from those changes.
- e. Changes that qualify under COMAR 26.11.03.19 are not subject to the requirements for Part 70 revisions.
- f. The Permittee shall include each off-permit change under COMAR 26.11.03.19 in the application for renewal of the part 70 permit.
- g. The permit shield in COMAR 26.11.03.23 does not apply to off-permit changes made under COMAR 26.11.03.19.
- h. The Permittee is subject to enforcement action if it is determined that an off-permit change made under COMAR 26.11.03.19 is not within the scope of this regulation.

16. ON-PERMIT CHANGES TO SOURCES

[COMAR 26.11.03.18]

The Permittee may make on-permit changes that are allowed under Section 502(b)(10) of the Clean Air Act as provided in COMAR 26.11.03.18 and in accordance with the following conditions:

- a. The Permittee may make a change to this facility without obtaining a revision to this Part 70 permit if:
 - (1) The change is not a Title I modification;
 - (2) The change does not result in emissions in excess of those expressly allowed under the federally enforceable provisions of the Part 70 permit for the permitted facility or for an emissions unit within the facility, whether expressed as a rate of emissions or in terms of total emissions;
 - (3) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

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- (4) The change does not violate an applicable requirement of the Clean Air Act;
 - (5) The change does not violate a federally enforceable permit term or condition related to monitoring, including test methods, record keeping, reporting, or compliance certification requirements;
 - (6) The change does not violate a federally enforceable permit term or condition limiting hours of operation, work practices, fuel usage, raw material usage, or production levels if the term or condition has been established to limit emissions allowable under this permit;
 - (7) If applicable, the change does not modify a federally enforceable provision of a compliance plan or schedule in this Part 70 permit unless the Department has approved the change in writing; and
 - (8) This permit does not expressly prohibit the change under COMAR 26.11.03.18.
- b. The Permittee shall notify the Department and the EPA in writing of a proposed on-permit change under COMAR 26.11.03.18 not later than 7 days before the change is made. The written information shall include the following information:
- (1) A description of the proposed change;
 - (2) The date on which the change is proposed to be made;
 - (3) Any change in emissions resulting from the change, including the pollutants emitted;
 - (4) Any new applicable requirement of the Clean Air Act; and
 - (5) Any permit term or condition that would no longer apply.
- c. The responsible official of this facility shall certify in accordance with COMAR 26.11.02.02F that the proposed change meets the criteria for the use of on-permit changes under COMAR 26.11.03.18.
- d. The Permittee shall attach a copy of each notice required by condition b. above to this Part 70 permit.

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- e. On-permit changes that qualify under COMAR 26.11.03.18 are not subject to the requirements for part 70 permit revisions.
- f. Upon satisfying the requirements under COMAR 26.11.03.18, the Permittee may make the proposed change.
- g. The permit shield in COMAR 26.11.03.23 does not apply to on-permit changes under COMAR 26.11.03.18.
- h. The Permittee is subject to enforcement action if it is determined that an on-permit change made under COMAR 26.11.03.18 is not within the scope of the regulation or violates any requirement of the State air pollution control law.

17. FEE PAYMENT

[COMAR 26.11.02.16A(2) & (5)(b)]

- a. The fee for this Part 70 permit is as prescribed in Regulation .19 of COMAR 26.11.02.
- b. The fee is due on and shall be paid on or before each 12-month anniversary date of the permit.
- c. Failure to pay the annual permit fee constitutes cause for revocation of the permit by the Department.

18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS

[COMAR 26.11.02.09.]

The Permittee may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits-to-construct and approvals:

- a. New Source Review source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

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- b. Prevention of Significant Deterioration source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;
- c. New Source Performance Standard source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;
- d. National Emission Standards for Hazardous Air Pollutants source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;
- e. A stationary source of lead that discharges one ton per year or more of lead or lead compounds measured as elemental lead, permit to construct required, except for generating stations constructed by electric companies;
- f. All stationary sources of air pollution, including installations and air pollution control equipment, except as listed in COMAR 26.11.02.10, permit to construct required;
- g. In the event of a conflict between the applicability of (a.— e.) above and an exemption listed in COMAR 26.11.02.10, the provision that requires a permit applies.
- h. Approval of a PSD or NSR source by the Department does not relieve the Permittee obtaining an approval from also obtaining all permits-to-construct required b y (c.— g.) above.

19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION

[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

The Permittee may request the Department to authorize special procedures for the Permittee to apply simultaneously, to the extent possible, for a permit to construct and a revision to this permit.

These procedures may provide for combined public notices, informational meetings, and public hearings for both permits but shall not adversely affect the rights of a person, including EPA and affected states, to obtain information about the application for a permit, to comment on an application, or to challenge a permit that is issued.

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These procedures shall not alter any existing permit procedures or time frames.

20. PROPERTY RIGHTS

[COMAR 26.11.03.06E(4)]

This Part 70 permit does not convey any property rights of any sort, or any exclusive privileges.

21. SEVERABILITY

[COMAR 26.11.03.06A(5)]

If any portion of this Part 70 permit is challenged, or any term or condition deemed unenforceable, the remainder of the requirements of the permit continues to be valid.

22. INSPECTION AND ENTRY

[COMAR 26.11.03.06G(3)]

The Permittee shall allow employees and authorized representatives of the Department, the EPA, and local environmental health agencies, upon presentation of credentials or other documents as may be required by law, to:

- a. Enter at a reasonable time without delay and without prior notification the Permittee's property where a Part 70 source is located, emissions-related activity is conducted, or records required by this permit are kept;
- b. Have access to and make copies of records required by the permit;
- c. Inspect all emissions units within the facility subject to the permit and all related monitoring systems, air pollution control equipment, and practices or operations regulated or required by the permit; and

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- d. Sample or monitor any substances or parameters at or related to the emissions units at the facility for the purpose of determining compliance with the permit.

23. DUTY TO PROVIDE INFORMATION

[COMAR 26.11.03.06E(5)]

The Permittee shall furnish to the Department, within a reasonable time specified by the Department, information requested in writing by the Department in order to determine whether the Permittee is in compliance with the federally enforceable conditions of this Part 70 permit, or whether cause exists for revising or revoking the permit. Upon request, the Permittee shall also furnish to the Department records required to be kept under the permit.

For information claimed by the Permittee to be confidential and therefore potentially not discloseable to the public, the Department may require the Permittee to provide a copy of the records directly to the EPA along with a claim of confidentiality.

The Permittee shall also furnish to the Department, within a reasonable time specified by the Department, information or records requested in writing by the Department in order to determine if the Permittee is in compliance with the State-only enforceable conditions of this permit.

24. COMPLIANCE REQUIREMENTS

[COMAR 26.11.03.06E(1)] and [COMAR 26.11.03.06A(11)] and [COMAR 26.11.02.05]

The Permittee shall comply with the conditions of this Part 70 permit. Noncompliance with the permit constitutes a violation of the Clean Air Act, and/or the Environment Article Title 2 of the Annotated Code of Maryland and may subject the Permittee to:

- a. Enforcement action,
- b. Permit revocation or revision,
- c. Denial of the renewal of a Part 70 permit, or

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d. Any combination of these actions.

The conditions in this Part 70 permit are enforceable by EPA and citizens under the Clean Air Act except for the State-only enforceable conditions.

Under Environment Article Section 2-609, Annotated Code of Maryland, the Department may seek immediate injunctive relief against a person who violates this permit in such a manner as to cause a threat to human health or the environment.

25. CREDIBLE EVIDENCE

Nothing in this permit shall be interpreted to preclude the use of credible evidence to demonstrate noncompliance with any term of this permit.

26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

[COMAR 26.11.03.06E(2)]

The need to halt or reduce activity in order to comply with the conditions of this permit may not be used as a defense in an enforcement action.

27. CIRCUMVENTION

[COMAR 26.11.01.06]

The Permittee may not install or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total weight of emissions, conceals or dilutes emissions which would otherwise constitute a violation of any applicable air pollution control regulation.

28. PERMIT SHIELD

[COMAR 26.11.03.23]

A permit shield as described in COMAR 26.11.03.23 shall apply only to terms and conditions in this Part 70 permit that have been specifically

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identified as covered by the permit shield. Neither this permit nor COMAR 26.11.03.23 alters the following:

- a. The emergency order provisions in Section 303 of the Clean Air Act, including the authority of EPA under that section;
- b. The liability of the Permittee for a violation of an applicable requirement of the Clean Air Act before or when this permit is issued or for a violation that continues after issuance;
- c. The requirements of the Acid Rain Program, consistent with Section 408(a) of the Clean Air Act;
- d. The ability of the Department or EPA to obtain information from a source pursuant to Maryland law and Section 114 of the Clean Air Act; or
- e. The authority of the Department to enforce an applicable requirement of the State air pollution control law that is not an applicable requirement of the Clean Air Act.

29. ALTERNATE OPERATING SCENARIOS

[COMAR 26.11.03.06A(9)]

For all alternate operating scenarios approved by the Department and contained within this permit, the Permittee, while changing from one approved scenario to another, shall contemporaneously record in a log maintained at the facility each scenario under which the emissions unit is operating and the date and time the scenario started and ended.

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SECTION III PLANT WIDE CONDITIONS

1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION

[COMAR 26.11.06.03D]

The Permittee shall not cause or permit any building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

2. OPEN BURNING

[COMAR 26.11.07]

Except as provided in COMAR 26.11.07.04, the Permittee shall not cause or permit an open fire from June 1 through August 31 of any calendar year. Prior to any open burning, the Permittee shall request and receive approval from the Department.

3. AIR POLLUTION EPISODE

[COMAR 26.11.05.04]

When requested by the Department, the Permittee shall prepare in writing standby emissions reduction plans, consistent with good industrial practice and safe operating procedures, for reducing emissions creating air pollution during periods of Alert, Warning, and Emergency of an air pollution episode.

4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS

[COMAR 26.11.01.07] and [COMAR 26.11.03.06C(7)]

The Permittee shall comply with the following conditions for occurrences of excess emissions and deviations from requirements of this permit, including those in Section VI – State-only Enforceable Conditions:

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- a. Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation;
- b. Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence;
- c. When requested by the Department the Permittee shall report all deviations from permit conditions, including those attributed to malfunctions as defined in COMAR 26.11.01.07A, within 5 days of the request by submitting a written description of the deviation to the Department. The written report shall include the cause, dates and times of the onset and termination of the deviation, and an account of all actions planned or taken to reduce, eliminate, and prevent recurrence of the deviation;
- d. The Permittee shall submit to the Department semi-annual monitoring reports that confirm that all required monitoring was performed, and that provide accounts of all deviations from permit requirements that occurred during the reporting periods. Reporting periods shall be January 1 through June 30 and July 1 through December 31, and reports shall be submitted within 30 days of the end of each reporting period. Each account of deviation shall include a description of the deviation, the dates and times of onset and termination, identification of the person who observed or discovered the deviation, causes and corrective actions taken, and actions taken to prevent recurrence. If no deviations from permit conditions occurred during a reporting period, the Permittee shall submit a written report that so states.
- e. When requested by the Department, the Permittee shall submit a written report to the Department within 10 days of receiving the request concerning an occurrence of excess emissions. The report shall contain the information required in COMAR 26.11.01.07D(2).

5. ACCIDENTAL RELEASE PROVISIONS

[COMAR 26.11.03.03B(23)] and [40 CFR 68]

Should the Permittee become subject to 40 CFR 68 during the term of this permit, the Permittee shall submit risk management plans by the date

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specified in 40 CFR 68.150 and shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.

The Permittee shall initiate a permit revision or reopening according to the procedures of 40 CFR 70.7 to incorporate appropriate permit conditions into the Permittee's Part 70 permit.

6. GENERAL TESTING REQUIREMENTS

[COMAR 26.11.01.04]

The Department may require the Permittee to conduct, or have conducted, testing to determine compliance with this Part 70 permit. The Department, at its option, may witness or conduct these tests. This testing shall be done at a reasonable time, and all information gathered during a testing operation shall be provided to the Department.

7. EMISSIONS TEST METHODS

[COMAR 26.11.01.04]

Compliance with the emissions standards and limitations in this Part 70 permit shall be determined by the test methods designated and described below or other test methods submitted to and approved by the Department.

Reference documents of the test methods approved by the Department include the following:

- a. 40 CFR 60, appendix A
- b. 40 CFR 51, appendix M
- c. The Department's Technical Memorandum 91-01 "Test Methods and Equipment Specifications for Stationary Sources", (January 1991), as amended through Supplement 3, (October 1, 1997)

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8. EMISSIONS CERTIFICATION REPORT

**[COMAR 26.11.01.05-1] and [COMAR 26.11.02.19C] and
[COMAR 26.11.02.19D]**

The Permittee shall certify actual annual emissions of regulated pollutants from the facility on a calendar year basis.

- a. The certification shall be on forms obtained from the Department and submitted to the Department not later than April 1 of the year following the year for which the certification is required;
- b. The individual making the certification shall certify that the information is accurate to the individual's best knowledge. The individual shall be:
 - (1) Familiar with each source for which the certifications forms are submitted, and
 - (2) Responsible for the accuracy of the emissions information;
- c. The Permittee shall maintain records necessary to support the emissions certification including the following information if applicable:
 - (1) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;
 - (2) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;
 - (3) Amounts, types and analyses of all fuels used;
 - (4) Emissions data from continuous emissions monitors that are required by this permit, including monitor calibration and malfunction information;

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- (5) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment including:
 - (a) Significant maintenance performed,
 - (b) Malfunctions and downtime, and
 - (c) Episodes of reduced efficiency of all equipment;
- (6) Limitations on source operation or any work practice standards that significantly affect emissions; and
- (7) Other relevant information as required by the Department.

9. COMPLIANCE CERTIFICATION REPORT

[COMAR 26.11.03.06G(6) and (7)]

The Permittee shall submit to the Department and EPA Region III a report certifying compliance with each term of this Part 70 permit including each applicable standard, emissions limitation, and work practice for the previous calendar year by April 1 of each year.

- a. The compliance certification shall include:
 - (1) The identification of each term or condition of this permit which is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether the compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of each source, currently and over the reporting period; and
 - (5) Any other information required to be reported to the Department that is necessary to determine the compliance status of the Permittee with this permit.
- b. The Permittee shall submit the compliance certification reports to the Department and EPA simultaneously.

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10. CERTIFICATION BY RESPONSIBLE OFFICIAL

[COMAR 26.11.02.02F]

All application forms, reports, and compliance certifications submitted pursuant to this permit shall be certified by a responsible official as to truth, accuracy, and completeness. The Permittee shall expeditiously notify the Department of an appointment of a new responsible official.

The certification shall be in the following form:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING

[COMAR 26.11.03.06C(5)]

The Permittee shall gather and retain the following information when sampling and testing for compliance demonstrations:

- a. The location as specified in this permit, and the date and time that samples and measurements are taken;
- b. All pertinent operating conditions existing at the time that samples and measurements are taken;
- c. The date that each analysis of a sample or emissions test is performed and the name of the person taking the sample or performing the emissions test;
- d. The identity of the Permittee, individual, or other entity that performed the analysis;
- e. The analytical techniques and methods used; and

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- f. The results of each analysis.

12. GENERAL RECORDKEEPING

[COMAR 26.11.03.06C(6)]

The Permittee shall retain records of all monitoring data and information that support the compliance certification for a period of five (5) years from the date that the monitoring, sample measurement, application, report or emissions test was completed or submitted to the Department.

These records and support information shall include:

- a. All calibration and maintenance records;
- b. All original data collected from continuous monitoring instrumentation;
- c. Records which support the annual emissions certification; and
- d. Copies of all reports required by this permit.

13. GENERAL CONFORMITY

[COMAR 26.11.26.09]

The Permittee shall comply with the general conformity requirements of 40 CFR 93, Subpart B and COMAR 26.11.26.09.

14. ASBESTOS PROVISIONS

[40 CFR 61, Subpart M]

The Permittee shall comply with 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

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15. OZONE DEPLETING REGULATIONS

[40 CFR 82, Subpart F]

The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the prohibitions and required practices pursuant to 40 CFR 82.154 and 82.156.
- b. Equipment used during the maintenance, service, repair or disposal of appliances shall comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repairs or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- d. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.155.
- e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

16. ACID RAIN PERMIT

Not applicable

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SECTION IV PLANT SPECIFIC CONDITIONS

This section provides tables that include the emissions standards, emissions limitations, and work practices applicable to each emissions unit located at this facility. The Permittee shall comply with all applicable emissions standards, emissions limitations and work practices included herein.

The tables also include testing, monitoring, record keeping and reporting requirements specific to each emissions unit. In addition to the requirements included here in **Section IV**, the Permittee is also subject to the general testing, monitoring, record keeping, and reporting requirements included in **Section III – Plant Wide Conditions** of this permit.

Unless otherwise provided in the specific requirements for an emissions unit, the Permittee shall maintain at the facility for at least five (5) years, and shall make available to the Department upon request, all records that the Permittee is required under this section to establish. [Reference: **COMAR 26.11.03.06C(5)(g)**]

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1.0	<p><u>Emissions Unit Number(s): C1, C2, C3, & C4</u></p> <p><u>Fuel burning equipment.</u></p> <p>C1 thru C4: Four (4) Combustion Engineering Boilers each rated at 130 MMBtu/hr. firing natural gas and fuel oil (No. 2 or No. 6) (only during periods of natural gas curtailment), and each equipped with an ultra-low NO_x burner. [MDE Reg. Nos. 510-0314-5-1444, 5-1445, 5-1446, and 5-1447].</p>
1.1	<p><u>Applicable Standards/Limits:</u></p> <p>A. <u>Control of Visible Emissions</u> COMAR 26.11.09.05A - Visible Emissions. (2) “Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.</p>

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(3) Exceptions. Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:
(a) The visible emissions are not greater than 40 percent opacity;
and
(b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period.”

B. Control of Particulate Matter

(1) **COMAR 26.11.09.06B(1)(a) - Control of Particulate Matter - Areas III and IV – Dust Collector Devices Required.** “A person may not cause or permit the combustion of residual fuel oil in fuel burning equipment unless the equipment is fitted with a dust collector which is so designed that it can reasonably be expected to produce sufficient dust particle force, residence time, and particle retention to satisfy the requirements of Table 1. This paragraph does not apply to fuel burning equipment where by-product gases or by-product gases in combination with residual fuel oil are burned and where the effluent gases do not contain particulate matter in excess of the requirements of Table 1, as applicable to residual oil burning.”

(2) **COMAR 26.11.09.06B(2) - Control of Particulate Matter - Areas III and IV - Residual Fuel-Oil-Burning Equipment.** “A person may **not** cause or permit particulate matter caused by the combustion of residual fuel oil to be discharged into the atmosphere in excess of the amounts shown in Table 1.”

(3) **COMAR 26.11.09.09: Table 1 - Emission Standards and Dust Collector Performance Standards for Fuel-Burning Equipment.**

Table 1 Emission Standards and Dust Collector Performance Standards for Fuel-Burning Equipment		
<i>Equipment Description</i>	<i>Max. Rated Heat Input in million Btu (gigajoules) per hour per furnace</i>	<i>Max. Allowable Emissions of Part. Matter – gr/scfd (mg/dscm)</i>
Existing and new equipment burning residual oil	Less than 13 (13.7) 13 – 50 (13.7 – 52.8) 50 – 250 (52.8 – 265)	No requirement (a) 0.03 (69) 0.020 (46)

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(4) No. 6 fuel oil is limited to a maximum of **0.068% ash content**.
[Reference: MDE letter dated November 8, 2005 & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]

C. Control of Sulfur Oxides

(1) **COMAR 26.11.09.07A(2)** - Sulfur Content Limitations for Fuel.

“A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: (2) In Areas III and IV:

(a) *Not applicable.*

(b) Distillate fuel oils, 0.3 percent.

(c) Residual fuel oils, 1.0 percent.”

(2) No. 6 fuel oil is limited to a maximum of 0.5% sulfur content.

[Reference: MDE letter dated November 8, 2005 & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

D. Control of Nitrogen Oxides

(1) **COMAR 26.11.09.08B(1)(c)** - Control of NO_x for Major Stationary Sources – Emissions Standards and Requirements.

“Emission Standards in Pounds of NO_x per Million Btu of heat input.”

Fuel	Tangential Fired	Wall-Fired
Gas only	0.20	0.20
Gas/Oil	0.25	0.25
Coal (dry bottom)	0.38	0.38
Coal (wet bottom)	1.00	1.00

(2) **COMAR 26.11.09.08B(5)** - Control of NO_x for Major Stationary Sources – Operator Training.

(a) “For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.

(b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department.”

(3) **COMAR 26.11.09.08D(1)(b)** - Requirements for Fuel-Burning Equipment with a Rated Heat Input Capacity of Less than 250 Million Btu Per Hour and Greater than 100 Million Btu Per Hour.

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	<p>“All other fuel burning equipment with a rated heat input capacity of less than 250 Million Btu per hour and greater than 100 Million Btu per hour shall meet the NO_x emission rates set forth in §B(1)(c) of this regulation.”</p> <p>(4) No. 6 fuel oil is limited to a maximum of 0.5% nitrogen content. [Reference: MDE letter dated November 8, 2005 & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p><u>E. Operational Limitations</u></p> <p>(1) The Permittee shall operate the boilers such that the combined hours of operation for Boilers #1 through #4 do not exceed 20,220 hours in any consecutive 12-month period. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(12) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>(2) In accordance with COMAR 26.11.09.06B(2), particulate matter emissions from the stack services Boilers #1 through #4 shall not exceed 0.020 grains per SCFD (corrected to 50% excess oxygen). [Reference: MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>(3) In order to meet the 0.020 grains per SCFD (corrected to 50% excess oxygen) particulate matter emissions limit of COMAR 26.11.09.06B(2), the Permittee shall:</p> <p>(a) Use only fuel oil (No. 2 or No. 6) in Boilers #1 through #4 with an ash content weight percent that will not cause total particulate matter emissions from the single powerhouse stack to exceed 0.020 grains per SCFD (corrected to 50% excess oxygen);</p> <p>(b) Use natural gas and fuel oil (No. 2 or No. 6) in separate operating boilers that will not cause total particulate matter emissions from the single powerhouse stack to exceed 0.020 grains per SCFD (corrected to 50% excess oxygen); or</p> <p>(c) Install a dust collector device designed to meet the 0.020 grains per SCFD (corrected to 50% excess oxygen) particulate matter emissions limit per COMAR 26.11.09.06B(1)(a). [Reference: MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>(4) The Permittee shall design and operate the ultra-low NO_x burners on Boilers 1-4 and the low NO_x burner on Boiler 6 to meet</p>

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	<p>the emission rate of 500 lbs./day (or 624 lbs./day, when appropriate) on a 30-day rolling average. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Sections V(11)(a) & V(10)(d) & MDE Permit to Construct 510-5-1476 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014 and approved by the EPA in a letter on April 2, 2014.]</p> <p>(5) The primary combined NO_x emission limit that applies to the operation of boilers 1-4 and 6 is 500 lbs./day, calculated on a 30-day rolling average as described in the Order Modifying Consent Decree. This limit applies at all times, except in the circumstances described below when the limit of 624 lbs./day applies.</p> <p>(a) Any day in which:</p> <ul style="list-style-type: none"> i. Boiler 6 operates at any point in time; ii. Boiler 6 operates in conjunction with any of the CE boilers; or iii. Boiler 6 does not operate and only three (3) of the CE boilers operate would count toward the 500 lbs./day 30 day rolling average. <p>(b) If there are seven calendar days within a 30-day period in which Boiler 6 does not operate and each of the four CE boilers operates for some period of time in that calendar day, then the combined NO_x emission limit is 624 lbs./day. The seven days do not need to be consecutive.</p> <p>(c) ASR will calculate the 30-day rolling average each day. If all four CE boilers operated for six days or less within the previous 30 calendar day period, the limit of 500 lbs./day applies. If all four CE boilers operated seven days or more during the previous 30-calendar day period, the limit of 624 lbs./day applies.</p> <p>[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(11)(a) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014, and approved by the EPA in a letter on April 2, 2014.]</p> <p>(6) The Permittee shall continuously operate the NO_x control technology at all times of boiler operation. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section</p>

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	<p>V(11)(b) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>(7) The total combined NO_x emissions from Boilers 1-4 & 6 in any consecutive 12-month period shall not exceed 60 tons. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(13) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014 and approved by the EPA in a letter on April 2, 2014.]</p> <p>(8) The total combined NO_x emissions from Boilers 1-4 & 6 in any calendar month shall not exceed 6.0 tons. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(14) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p>
1.2	<p><u>Testing Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall conduct Method 9, 22 or equivalent method approved by the Department opacity observations for at least one hour during stack testing to demonstrate compliance with the no visible emissions requirement of COMAR 26.11.09.05A(2) when burning fuel oil (No. 2 or No. 6). [Reference: COMAR 26.11.03.06C & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>B. <u>Control of Particulate Matter</u> Stack emissions tests shall be conducted at least once every two-year period to demonstrate compliance with the 0.020 gr/scfd particulate matter emission limit when the boiler burns fuel oil (No. 2 or No. 6) with a pre-determined ash content weight percent. Stack emissions tests shall be conducted to demonstrate compliance with the 0.020 gr/scfd particulate matter emission limit can be achieved during either of the following operating conditions: (1) Burning only fuel oil (No. 2 or No. 6) with a pre-determined ash content weight percent in boilers 1 thru 4; and burning the lowest possible ratio of natural gas to fuel oil (No. 2 or No. 6) in boilers #1 thru #4. (2) Boilers #1 thru #4 shall each be operated at 90% or higher of their rated capacity during all stack emissions tests. [Reference: COMAR 26.11.03.06C]</p>

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	<p><u>Note:</u> The Permittee is not required to conduct stack testing on Boilers #1 thru #4 when fuel oil (No. 2 or No. 6) has not been utilized at any time during the preceding two (2) years.</p> <p>C. <u>Control of Sulfur Oxides</u> See Monitoring Requirements.</p> <p>D. <u>Control of Nitrogen Oxides</u> See Monitoring Requirements.</p> <p>E. <u>Operational Limitations</u> See Monitoring Requirements.</p>
1.3	<p><u>Monitoring Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall: (1) properly operate and maintain the boilers in a manner to prevent visible emissions; and (2) verify no visible emissions when burning fuel oil (No. 2 or No. 6). The Permittee shall perform a visual observation for a 6-minute once for each 168-hour period when the boiler burns fuel oil. If a boiler does not burn fuel oil for more than 100 hours in a calendar year, the visible emission observation requirement is waived for that boiler. (3) The Permittee shall perform the following if visible emissions are observed: (a) inspect combustion system and boiler operation; (b) perform all necessary adjustments and/or repairs to the boiler within 48 hours so that visible emissions are eliminated; (c) document in writing the results of inspections, adjustments, and/or repair to the boiler; and (d) after 48 hours, if required adjustments and/or repair had not eliminated the visible emissions, perform a Method 9 observation for an 18-minute period once per day until corrective actions have eliminated the visible emissions. [Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the fuel oil (No. 2 or No. 6) has an ash content equal to or less than 0.068% by weight. [Reference: MDE letter dated November 8, 2005 & COMAR 26.11.03.06C]</p>

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<p>C. <u>Control of Sulfur Oxides</u></p> <p>(1) The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the No. 6 fuel oil has a sulfur content equal to or less than 0.5% by weight. [Reference: MDE letter dated November 8, 2005 & COMAR 26.11.03.06C]</p> <p>(2) The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the No. 2 fuel oil has a sulfur content equal to or less than 0.3% by weight. [Reference: COMAR 26.11.03.06C]</p> <p>D. <u>Control of Nitrogen Oxides</u></p> <p>(1) The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the oil has a nitrogen content equal to or less than 0.5% by weight. [Reference: MDE letter dated November 8, 2005 & COMAR 26.11.03.06C]</p> <p>(2) At a point in each stack prior to a point at which boiler flue gas combines with flue gas from any other boiler, the Permittee shall install and make operational, concurrent with commencement of operations of the ultra-low NO_x burners, an NO_x continuous emissions monitoring system (CEMS) to monitor NO_x emissions in accordance with the requirements of 40 CFR Part 60. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(15) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>(3) The required CEMS shall monitor and record the applicable NO_x Emission Rate for each boiler to demonstrate compliance with the established NO_x Emissions Rates and shall be continuously operated, except during CEMS breakdowns, repairs, calibration checks, and zero span adjustments. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(16) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>(4) If the Permittee is unable to obtain emissions data from the CEMS because of a malfunction of the CEM for more than 2 hours in duration, the Permittee shall use the alternative measurement method approved by the Department and EPA. [Reference: COMAR 26.11.01.11B(4) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>(5) A CEMS used to monitor a gas concentration shall record not less than four equally spaced data points per hour and automatically reduce</p>

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	<p>data in terms of averaging times consistent with the applicable emission standard per COMAR 26.11.01.11D. [Reference: MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>(6) All emissions of NO_x shall be measured by the CEMS. During any periods of time when any CEMS is inoperable or not measuring NO_x emissions from any boiler, the Permittee shall apply the missing data substitution procedures provided in 40 CFR Part 75, Subpart D. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(18) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>(7) COMAR 26.11.01.11C – <u>Quality Assurance for CEMS.</u> "A CEM used to monitor a gas concentration shall meet the quality assurance criteria of 40 CFR Part 60, Appendix F, as amended, which is incorporated by reference, or, if applicable, the quality assurance criteria of 40 CFR Part 75, Appendix B, as amended."</p> <p>E. <u>Operational Limitations</u> See Monitoring Requirements for Control of Nitrogen Oxides.</p>
1.4	<p><u>Record Keeping Requirements:</u> Note: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall: (1) maintain an operational manual and preventive maintenance plan on site; (2) maintain the test result of the Method 9 performed; (3) maintain records of the results of the monthly inspections; (4) maintain a record of the maintenance performed that relates to combustion performance; (5) maintain a log of visible emissions observations performed and make it available to the Department upon request; (6) maintain a record of the hours that fuel oil (No. 2 or No. 6) is burned. [Reference: COMAR 26.11.03.06C].</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall: (1) maintain records of all stack emissions test documents and</p>

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<p>(2) maintain the fuel supplier certification for each shipment of fuel oil (No. 2 or No. 6) stating the ash content in weight percent. [Reference: COMAR 26.11.03.06C]</p> <p><u>C. Control of Sulfur Oxides</u> The Permittee shall maintain records of the annual fuel supplier certifications stating that the No. 6 fuel oil used in Boilers #1 thru #4 is in compliance with the 1.0% by weight sulfur limitation required by COMAR 26.11.09.07A(2)(c). [Note: Per November 8, 2005, letter from MDE, based on stack testing data, sulfur content of fuel oil is not to exceed 0.5%]</p> <p>The Permittee shall maintain records of the annual fuel supplier certifications stating that the No. 2 fuel oil used in Boilers 1 thru 4 is in compliance with the 0.3% by weight sulfur limitation required by COMAR 26.11.09.07A(2)(b).</p> <p>The Permittee shall maintain records of the certification from the supply company of all natural gas curtailment events, including date and duration of the event. [Reference: MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p><u>D. Control of Nitrogen Oxides</u> The Permittee shall maintain records of the following and make available to the Department upon request: (1) The fuel supplier certification for each shipment of fuel oil (No. 2 or No. 6) stating the nitrogen content in weight percent. (2) All training and combustion analysis records required by COMAR 26.11.09.08B(5). [Reference: COMAR 26.11.03.06C]</p> <p><u>E. Operational Limitations</u> (1) The Permittee shall maintain electronically for at least five (5) years, and shall make available to the Department upon request, records of the following information: (a) Monthly fuel oil (No. 2 or No. 6) usage in gallons per month and the total fuel usage (No. 2 or No. 6) for the previous rolling 12-month period. [Reference: MDE Permit to Construct 510-5-1444 through 5-1447(August 28, 2014)] (b) To comply with the annual emissions cap - the Permittee shall convert the monitored CEMS data to a mass emission (tons) and</p>
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	<p>sum the total amount of NO_x emissions for the current month and the previous eleven months. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(20) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>(c) To comply with the monthly emissions cap - the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the amount of NO_x emissions for each operating day during the month. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(21) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>(d) All stack emissions test documents. [Reference: MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>(2) To comply with the limit on combined total hours of operation for Boilers #1 through #4, the Permittee shall maintain electronically for at least five (5) years, and shall make available to the Department upon request, monitoring records of the hours of operation of each boiler. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(19) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p>
1.5	<p><u>Reporting Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall report, in accordance with requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Administration.</p> <p>B. <u>Control of Particulate Matter</u> (1) At least 30 days prior to the projected date of the stack emission test, the Permittee shall submit a test protocol to the Department for review and approval. (2) Within 45 days after the emission test, the Permittee shall submit to the Department a stack test report that includes the stack emissions test results and opacity observations results. [Reference: COMAR 26.11.03.06C]</p> <p>C. <u>Control of Sulfur Oxides</u> The Permittee shall make records of certification from the supplier available to the Department upon request. [Reference: COMAR 26.11.03.06C]</p>

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<p>D. <u>Control of Nitrogen Oxides</u></p> <p>(1) The Permittee shall submit a record of training program attendance for each operator to the Department upon request.</p> <p>(2) The Permittee shall comply with the CEM System Downtime Reporting Requirements of COMAR 26.11.01.11E as follows:</p> <p>(a) All CEM system downtime that lasts or is expected to last more than 24 hours shall be reported to the Department by telephone before 10 a.m. of the first regular business day following the breakdown.</p> <p>(b) The system breakdown report required by §E(1)(a) of this regulation shall include the reason, if known, for the breakdown and the estimated period of time that the CEM will be down. The owner or operator of the CEM shall notify the Department by telephone when an out-of-service CEM is back in operation and producing data that has met performance specifications for accuracy, reliability, and durability of acceptable monitoring systems, as provided in COMAR 26.11.31, and is producing data.</p> <p>(3) The Permittee shall comply with the CEM Data Reporting Requirements of COMAR 26.11.01.11E as follows:</p> <p>(a) All test results shall be reported in a format approved by the Department.</p> <p>(b) Certification testing shall be repeated when the Department determines that the CEM data may not meet performance specifications because of component replacement or other conditions that affect the quality of generated data.</p> <p>(c) A quarterly summary report shall be submitted to the Department not later than 30 days following each calendar quarter. The report shall be in a format approved by the Department, and shall include the following:</p> <p>(i) The cause, time periods, and magnitude of all emissions which exceed the applicable emission standards;</p> <p>(ii) The source downtime including the time and date of the beginning and end of each downtime period and whether the source downtime was planned or unplanned;</p> <p>(iii) The time periods and cause of all CEM downtime including records of any repairs, adjustments, or maintenance that may affect the ability of the CEM to meet performance specifications of emission data;</p> <p>(iv) Quarterly totals of excess emissions, installation downtime, and CEM downtime during the calendar quarter;</p> <p>(v) Quarterly quality assurance activities;</p>
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	<p>(vi) Daily calibration activities that include reference values, actual values, absolute or percent of span differences, and drift status; and</p> <p>(vii) Other information required by the Department that is determined to be necessary to evaluate the data, to ensure that compliance is achieved, or to determine the applicability of this regulation.</p> <p>(d) All information required by this regulation to be reported to the Department shall be retained and made available for review by the Department for a minimum of 2 years from the time the report is submitted.”</p> <p>(4) The Permittee must report orally or by electronic or facsimile transmission to the U.S. EPA and MDE, no later than 24 hours after the Permittee knew or should have known of any violation of the District Court Consent Decree, any permit regulations, or any event that may pose an immediate threat to the public health or welfare or the environment.</p> <p>(5) The Permittee shall submit within 30 days following each January 1st and July 1st a semi-annual report to the U.S. EPA for the immediately preceding half-calendar year period. This report shall:</p> <p>(a) Identify any and all dates on which the Permittee has installed, or describe the progress of installation of, each ultra-low NO_x burner required for NO_x control, emission limits, CEMS, and monitoring requirements, and describe any problems encountered or anticipated during such installation, together with implemented or proposed solutions;</p> <p>(b) Provide all CEMS data collected for each Boiler #1 through #4 including an explanation of any periods of CEMS downtime together with any missing data for which American Sugar applied missing data substitution procedures, under Section VI.B of the Consent Order.</p> <p>(c) Demonstrate compliance with all applicable 30-day rolling average emission limits in Section V of the District Court Consent Decree.</p> <p>(d) Describe the status of any operation and maintenance work relating to activities required under the District Court Consent Decree.</p> <p>[Reference: MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014)]</p> <p>E. <u>Operational Limitations</u> See Reporting Requirements for Control Nitrogen Oxides.</p>

“A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above.”

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2.0	<p><u>Emissions Unit Number(s): C6</u></p> <p><u>Fuel burning equipment.</u></p> <p>C6 – One (1) Babcock and Wilcox boiler rated at 300 MMBtu/hr. firing natural gas and equipped with a low NO_x burner and flue gas recirculation. (MDE Reg. No. 510-0314-5-1476)</p>									
2.1	<p><u>Applicable Standards/Limits:</u></p> <p>A. <u>Control of Visible Emissions</u> COMAR 26.11.09.05A - Visible Emissions “(2) Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity. (3) <u>Exceptions.</u> “Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period.”</p> <p>B. <u>Control of Nitrogen Oxides</u> (1) COMAR 26.11.09.08B(1)(a), Control of NO_x Emissions for Major Stationary Sources - General Requirements and Conditions. “Emission Standards and Requirements. A person who owns or operates an installation that causes NO_x emissions subject to this regulation is in compliance with this regulation if the person establishes compliance with the emissions standards in §B(1)(c) of this regulation.” (2) COMAR 26.11.09.08B(1)(c), Control of NO_x Emissions for Major Stationary Sources – General Requirements and Conditions. “Emission Standards in Pounds of NO_x per Million Btu of heat input.”</p> <table><tr><td>Fuel</td><td>Tangential- Fired</td><td>Wall-Fired</td></tr><tr><td>Gas only</td><td>0.20</td><td>0.20</td></tr><tr><td>Gas/Oil</td><td>0.25</td><td>0.25</td></tr></table>	Fuel	Tangential- Fired	Wall-Fired	Gas only	0.20	0.20	Gas/Oil	0.25	0.25
Fuel	Tangential- Fired	Wall-Fired								
Gas only	0.20	0.20								
Gas/Oil	0.25	0.25								

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	Coal (dry bottom)	0.38	0.38
	Coal (wet bottom)	1.00	1.0
<p>(3) COMAR 26.11.09.08B(2)(a)(i) and (b), (c), and (d), <u>Control of NO_x Emissions for Major Stationary Sources – Demonstration of Compliance.</u> (a) “A person subject to a NO_x emission standard in this regulation shall demonstrate compliance as follows: (i) For installations equipped with a CEM, compliance with the NO_x emissions standards in this regulation shall be established using CEM data; or” (ii) <i>Not applicable.</i> (b) “CEMs shall be certified in accordance with 40 CFR Part 60, Appendix B, or Part 75, Appendix A.” (c) “CEMs shall meet the quality assurance criteria in 40 CFR Part 60, Appendix F, or, for sources subject to Title IV of the Clean Air Act (Acid Rain), the quality assurance criteria in 40 CFR Part 75, Appendix B.” (d) “Except as otherwise established by the Department and approved by the EPA, for a person who establishes compliance with the NO_x emissions standards in this regulation using a CEM, compliance shall be determined as 30-day rolling averages.” (e) <i>Not applicable.</i></p> <p>(4) COMAR 26.11.09.08B(5) - <u>Operator Training.</u> (a) “For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation. (b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department.”</p> <p>(5) COMAR 26.11.09.08C(3), <u>Requirements for Fuel-Burning Equipment with a Rated Heat Input Capacity of 250 Million Btu Per Hour or Greater.</u> “A person who owns or operates fuel burning equipment with a rated heat input capacity of 250 Million Btu per hour or greater shall install, operate, calibrate, and maintain a certified NO_x CEM or an alternative NO_x monitoring method approved by the Department and the EPA on each installation.”</p> <p>(6) The Permittee shall design and operate the ultra-low NO_x burners on Boilers 1-4 and the low NO_x burner on Boiler 6 to meet the emission rate of 500 lbs./day (or 624 lbs./day, when appropriate) on a 30-day rolling average. [Reference: District Court Consent Decree, Civil Action No.</p>			

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	<p>JKB-12-1408, Sections V(11)(a) & V(10)(d & MDE Permit to Construct 510-5-1476 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014 and approved by the EPA in a letter on April 2, 2014.]</p> <p>(7) The primary combined NO_x emission limit that applies to the operation of boilers 1-4 and 6 is 500 lbs./day, calculated on a 30-day rolling average as described in the District Court Consent Decree. This limit applies at all times, except in the circumstances described below when the limit of 624 lbs./day applies.</p> <p>(a) Any day in which:</p> <p>(1) Boiler #6 operates at any point in time;</p> <p>(2) Boiler #6 operates in conjunction with any of the CE boilers; or</p> <p>(3) Boiler #6 does not operate and only three (3) of the CE boilers operate would count toward the 500 lbs./day 30 day rolling average.</p> <p>(b) If there are seven calendar days within a 30-day period in which Boiler #6 does not operate and each of the four CE boilers operates for some period of time in that calendar day, then the combined NO_x emission limit is 624 lbs./day. The seven days do not need to be consecutive.</p> <p>(c) ASR will calculate the 30-rolling average each day. If all four CE boilers operated for six days or less within the previous 30 calendar day period, the limit of 500 lbs./day applies. If all four CE boilers operated seven days or more during the previous 30-calendar day period, the limit of 624 lbs./day applies.</p> <p>[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(11)(a) & MDE Permit to Construct 510-5-1444 through 5-1447 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014, and approved by the EPA in a letter on April 2, 2014.]</p> <p>(8) The total combined NO_x emissions from Boilers #1-#4 & #6 in any consecutive 12-month period shall not exceed 60 tons. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(13) & MDE Permit to Construct 510-5-1476 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014 and approved by the EPA in a letter on April 2, 2014.]</p>

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- (9) The total **combined** NO_x emissions from Boilers #1-#4 & 6 in any calendar month shall not exceed 6.0 tons. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(14) & MDE Permit to Construct 510-5-1476 (August 28, 2014)]**
- (10) The Permittee shall not cause to be discharged into the atmosphere any gases that contain NO_x (expressed as NO₂) in excess of 86 ng/J (0.20 lb./ MMBtu) heat input. This limit applies at all times including periods of startup, shutdown, or malfunction. Compliance with this emission limit is determined on a 30-day rolling average basis. **[Reference: 40 CFR §60.44b(l)(1), 40 CFR §60.44b(h), 40 CFR §60.44b(i), and 40 CFR §60.46b(a) & MDE Permit to Construct 510-5-1476 (August 28, 2014)]**
- (11) The Permittee shall continuously operate the low NO_x burner at all times of boiler operation. **[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(11)(b) & MDE Permit to Construct 510-5-1476 (August 28, 2014). Modified by the Order Modifying Consent Decree dated August 5, 2013, and the emission rates proposed in a letter to the EPA dated March 14, 2014, and approved by the EPA in a letter on April 2, 2014.]**
- (12) **COMAR 26.11.40-NO_x Ozone Season Emission Caps for Non-trading Large NO_x Units.**
.02 Applicability.
“A. The owner or operator of a non-trading large NO_x unit, that is not a unit subject to the federal Cross State Air Pollution Rule NO_x Ozone Season Group 2 Trading Program established under 40 CFR Part 97, Subpart EEEEE, shall comply with the ozone season NO_x emission limitation, monitoring, record keeping, and reporting requirements for ozone season emissions of NO_x set forth in this chapter. *(This is superseded by Group 3 Subpart GGGGG published April 30, 2021, effective June 29, 2021).*
B. The requirements of this chapter apply to a person who owns or operates a non-trading large NO_x unit located at the affected sources in §C of this regulation.
C. Affected Sources and Units. **(1) American Sugar Unit No. C6.”**
.03 NO_x Ozone Season Emission Caps.
A. The total combined NO_x ozone season emissions for all non-trading large NO_x units subject to this chapter may not exceed 1013 tons in accordance with the 40 CFR Part 97, Subpart E, Appendix C.

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	<p>B. <u>NO_x Ozone Season Emission Caps.</u> (1) The total combined ozone season NO_x emissions from all the affected units at an affected source as identified in Regulation .02C of this chapter may not exceed the NO_x ozone season emission caps in §B(2) of this regulation. (2) Table – <u>NO_x Ozone Season Emission Caps.</u></p> <table border="1" data-bbox="326 573 1365 688"> <tr> <td data-bbox="326 573 678 646">Affected Sources</td><td data-bbox="678 573 1365 646">NO_x Ozone Season Emission Caps Beginning May 1, 2018</td></tr> <tr> <td data-bbox="326 646 678 688">American Sugar</td><td data-bbox="678 646 1365 688">24 tons</td></tr> </table> <p>C. <u>Operational Limitations</u> (1) The Permittee shall burn only natural gas in this boiler. [Reference: MDE Permit to Construct 510-5-1476 (August 28, 2014)] (2) The Permittee must use gaseous fuels with potential SO₂ emissions rates of 26 ng/J (0.060 lb./MMBtu) or less and shall not use post-combustion technology to reduce SO₂ or PM emissions. The Permittee must meet these requirements in order to not be required to install or operate a COMS. [Reference: 40 CFR §60.48b(j)(2) & MDE Permit to Construct 510-5-1476 (August 28, 2014)]</p>	Affected Sources	NO _x Ozone Season Emission Caps Beginning May 1, 2018	American Sugar	24 tons
Affected Sources	NO _x Ozone Season Emission Caps Beginning May 1, 2018				
American Sugar	24 tons				
<p>2.2</p>	<p><u>Testing Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Reporting Requirements.</p> <p>B. <u>Control of Nitrogen Oxides</u> (1) The Permittee shall conduct the performance test as required under §60.8 using the continuous system for monitoring NO_x under §60.48b to determine compliance with the NO_x emission limit as follows: Following the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, the Permittee shall determine compliance with the NO_x standards under §60.44b on a continuous basis through the use of a 30-day rolling average emission rate. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NO_x emission data for the preceding 30 steam generating unit operating days. (2) Repeat certification testing when the Department determines that the CEM data may not meet performance specifications because of component replacement or other conditions that affect the opacity of generated data.</p>				

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	<p>[Reference: 40 CFR §60.46b(c) and 40 CFR §60.46b(e)(1) and (3) & COMAR 26.11.01.11E(2)(b)]</p> <p>C. <u>Operational Limitations</u> See Monitoring Requirements.</p>
2.3	<p><u>Monitoring Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Reporting Requirements.</p> <p>B. <u>Control of Nitrogen Oxides</u> (1) At a point in the stack prior to a point at which boiler flue gas combines with flue gas from any other boiler, American Sugar shall install and make operational, a NO_x continuous emissions monitoring system (CEMS) to monitor NO_x emissions in accordance with the requirements of 40 CFR Part 60. The CEMS shall be installed and operated in accordance with the plan approved by the Department and EPA under the provisions of COMAR 26.11.01.11B(1)(a). [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(15) and COMAR 26.11.01.11B(1)(a) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014) & COMAR 26.11.40.04A(1)]</p> <p>(2) The Permittee shall calibrate, maintain, and operate a continuous emissions monitoring system, and record the output of the system for measuring NO_x emissions in accordance with 40 CFR §60.48b(b)(1).</p> <p>(3) Each CEMs shall be installed, certified, calibrated, maintained, and operated in accordance with the applicable requirements of 40 CFR Part 60, and any requirements established by applicable Maryland regulations. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(17) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]</p> <p>(4) The Permittee shall install, calibrate, maintain, and operate CEMS for measuring NO_x and O₂ (or CO₂) emissions discharged to the atmosphere, and shall record the output of the system. [Reference: 40 CFR §60.48b(b)(1)]</p>

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	<p>(5) The procedures under §60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring system. The span value for NO_x is 500 ppm. [Reference: 40 CFR §60.48b(e)(2)(i)]</p> <p>(6) The CEMS shall monitor and record the applicable NO_x Emission Rate for Boiler #6 to demonstrate compliance with the NO_x emission rates and shall be continuously operated, except during CEMS breakdowns, repairs, calibration checks, and zero span adjustments. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(16) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]</p> <p>(7) The CEMS shall be operated, and data recorded during all periods of operation of Boiler #6 except for CEMS breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments. [Reference: 40 CFR §60.48b(c)]</p> <p>(8) The Permittee shall measure all emissions of NO_x with the CEMS. During any period of time when any CEMS is inoperable or not measuring NO_x emissions from Boiler #6, the Permittee shall apply the missing data substitution procedures in 40 CFR Part 75, Subpart D. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(18) and 40 CFR §60.48b(f) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]</p> <p>(9) To comply with the annual emission cap, the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the total amount of NO_x emissions for the current month and the previous eleven months. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(20) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]</p> <p>(10) To comply with the monthly emissions cap, the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the amount of NO_x emissions for each Operating Day during the month. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(21) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]</p> <p>(11) The 1-hour average NO_x emission rates measured by the continuous NO_x monitor required by 40 CFR §60.48b(b) and required under §60.13(h) shall be expressed in ng/J or lb./MMBtu heat input and shall be</p>

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	<p>used to calculate the average emission rates under §60.44b. The 1-hour averages shall be calculated using the data points required under §60.13(h)(2). [Reference: 40 CFR §60.48b(d)]</p> <p>(12) The Permittee shall use the alternative measurement method approved by the Department and the EPA if the Permittee is unable to obtain emissions data from CEMS because of a malfunction of the CEMS for more than 2 hours in duration. [Reference: COMAR 26.11.01.11B(4)]</p> <p>(13) The Permittee shall ensure that the CEMS used to monitor a gas concentration shall meet the quality assurance criteria of 40 CFR Part 60, Appendix F, as amended, which is incorporated by reference, or, if applicable, the quality assurance criteria of 40 CFR Part 75, Appendix B, as amended. [Reference: COMAR 26.11.01.10C]</p> <p>(14) The CEM used to monitor a gas concentration shall record not less than four equally spaced data points per hour and automatically reduce data in terms of averaging times consistent with the applicable emission standard. [Reference: COMAR 26.11.01.11D(2)]</p> <p>C. <u>Operational Limitations</u> The Permittee shall install meters to record the hours of operation of this boiler and shall maintain the monitoring records in an electronic format for at least five (5) years. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(19) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]</p>
2.4	<p><u>Record Keeping Requirements:</u> Note: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p>A. <u>Control of Visible Emissions</u> See Reporting Requirements.</p> <p>B. <u>Control of Nitrogen Oxides</u> The Permittee shall maintain records for at least two (2) years of the following information for Boiler 6 for each operating day. (a) Calendar date; (b) The average hourly NO_x emission rates (expressed as NO₂) (ng/J) or lb./MMBtu heat input) measured or predicted; (c) The 30-day average NO_x emission rates (ng/J or lb./MMBtu heat input) calculated at the end of each Boiler #6 operating day from the</p>

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	<p>measured or predicted hourly nitrogen oxide emission rates for the preceding 30 Boiler 6 operating days;</p> <p>(d) Identification of the Boiler 6 operating days when the calculated 30-day average NO_x emission rates are in excess of the NO_x emissions standards under §60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken;</p> <p>(e) Identification of the Boiler 6 operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;</p> <p>(f) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;</p> <p>(g) Identification of the “F” factor used for calculations, method of determination, and type of fuel combusted;</p> <p>(h) Identification of the times when the pollutant concentration exceeded full span of the CEMS;</p> <p>(i) Description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specification 2 or 3 in appendix B of 40 CFR Part 60; and</p> <p>(j) Results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1 of 40 CFR Part 60.</p> <p>[Reference: 40 CFR §60.49b(g), (i) and (o) & COMAR 26.11.40.04A(2)]</p> <p>The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, records of the following information:</p> <p>(a) Annual fuel use records for Boiler #6;</p> <p>(b) Log of operation and maintenance of the CEMs including duration and reason of any malfunctions; and</p> <p>(c) Records of operator training.</p> <p>[Reference: MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]</p> <p><u>C. Operational Limitations</u></p> <p>The Permittee shall record and maintain records of the amounts of natural gas combusted during each day and calculate the annual capacity factor for natural gas for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. The records must be maintained on-site for at least two (2) years and be made available to the Department upon request. [Reference: 40 CFR §60.49b(d)(1) and (o)]</p>

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2.5	<p><u>Reporting Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall report, in accordance with requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Administration.</p> <p>B. <u>Control of Nitrogen Oxides</u> (1) The Permittee must submit excess emission reports for any excess emissions that occurred during the reporting period. The Permittee must maintain these records on site for at least two (2) years. [Reference: 40 CFR §60.49b(h)(2)(i) and (o)]</p> <p>(2) The Permittee must report orally or by electronic or facsimile transmission to the U.S. EPA and MDE, no later than 24 hours after the Permittee knew or should have known of any violation of the District Court Consent Decree, any permit regulations, or any event that may pose an immediate threat to the public health or welfare of the environment. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section IX(40) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014)]</p> <p>(3) COMAR 26.11.09.08K - <u>Reporting Requirements.</u> (a) “When demonstration of compliance with the NO_x emission standards in this regulation is based on CEM data, quarterly emission reports shall be submitted to the Department on or before the thirtieth day of the month following the end of each calendar quarter. (b) When compliance with this regulation is demonstrated by a stack test, the results of the stack tests required by this regulation shall be submitted to the Department within 45 days after completion of the test. (c) A person subject to this regulation shall maintain annual fuel use records on site for not less than 3 years and make these records available to the Department upon request.”</p> <p>(4) The Permittee must report to the Department, by telephone, any CEM system downtime that lasts or is expected to last more than 24 hours, by 10 a.m. of the first regular business day following the breakdown. The Permittee must also notify the Department, by telephone, when an out-of-service CEMS is back in operation. [Reference: COMAR 26.11.01.11E(1)(a) and (b)]</p>

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	<p>(5) The Permittee shall comply with the CEM system downtime reporting requirements of COMAR 26.11.01.11E:</p> <p>(a) All CEM system downtime that lasts or is expected to last more than 24 hours shall be reported to the Department by telephone before 10 a.m. of the first regular business day following the breakdown.</p> <p>(b) The system breakdown report required by COMAR 26.11.01.11E(1)(a) shall include the reasons, if known, for the breakdown and the estimated period of time that the CEMS will be down. The Permittee shall notify the Department by telephone when an out-of-service CEM is back in operation and producing valid data.</p> <p>[Reference: COMAR 26.11.01.11E(1)]</p> <p>(6) The Permittee shall submit to the Department quarterly, a CEMS summary report not later than 30 days following each calendar quarter to demonstrate compliance with the NO_x emissions limits. The report shall include the following information:</p> <p>(a) The cause, time periods, and magnitude of all emissions which exceed the applicable emission standards;</p> <p>(b) The source downtime including the time and date of the beginning and end of each downtime period and whether the source downtime was planned or unplanned;</p> <p>(c) The time periods and cause of all CEM downtime including records of any repairs, adjustments, or maintenance that may affect the ability of the CEM to meet performance specifications of emission data;</p> <p>(d) Quarterly totals of excess emissions, installation downtime, and CEM downtime during the calendar quarter;</p> <p>(e) Quarterly quality assurance activities;</p> <p>(f) Daily calibration activities that include reference values, actual values, absolute or percent of span differences, and drift status; and</p> <p>(g) Other information required by the Department that is determined to be necessary to evaluate the data, to ensure that compliance is achieved, or to determine the applicability of this regulation.</p> <p>[Reference: COMAR 26.11.01.11E(2)(c) & COMAR 26.11.40.04B]</p> <p>(7) The Permittee shall submit within 30 days following each January 1st and July 1st, a semi-annual report to the U.S. EPA for the immediately preceding half-calendar year period. This report shall:</p> <p>(a) Identify any and all dates on which the Permittee has installed, or describe the progress of installation of the low NO_x burner required for NO_x control, emission limits, CEMs, and monitoring requirements and describe any problems encountered or anticipated during such installation, together with implemented or proposed solutions;</p>
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	<p>(b) Provide all CEMS data collected for Boiler 6 including an explanation of any periods of CEMS downtime together with any missing data for which the Permittee applied and missing data substitution procedures under Section VI.B of the District Court Consent Decree;</p> <p>(c) Demonstrate compliance with all applicable 30-day rolling average emission limits in Section V of the District Court Consent Decree; and</p> <p>(d) Describe the status of any operation and maintenance work relating to activities under the District Court Consent Decree.</p> <p>[Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section IX(38) & MDE Permit to Construct No. 510-0314-5-1476 (August 28, 2014) & COMAR 26.11.40.04A(2)]</p> <p>C. <u>Operational Limitations</u> See Record Keeping Requirements and Reporting Requirements of Control of Nitrogen Oxides.</p>

“A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above.”

Table IV – 3	
3.0	<p><u>Emissions Unit Number(s): R29-1</u></p> <p>R29-1 – Raw Sugar Unloading and Conveying (MDE Reg. No. 6-2019).</p>
3.1	<p><u>Applicable Standards/Limits:</u></p> <p>A. <u>Control of Visible Emissions</u> COMAR 26.11.06.02 - Visible Emission Standards. C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.” A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”</p> <p>B. <u>Control of Particulate Matter</u> COMAR 26.11.06.03C(1) - Particulate Matter from Unconfined Sources.</p>

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	<p>“A person may not cause or permit emissions from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions. In making this determination, the Department shall consider technological feasibility, practicality, economic impact, and the environmental consequences of the decision.”</p>
3.2	<p><u>Testing Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Monitoring Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Monitoring Requirements.</p>
3.3	<p><u>Monitoring Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation. If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:</p> <ol style="list-style-type: none"> (1) Inspect all process and/or control equipment that may affect visible emissions; (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated; (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. <p>[Reference: COMAR 26.11.03.06]</p> <p>B. <u>Control of Particulate Matter</u></p>

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	<p>The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. [Reference: COMAR 26.11.03.06]</p>
3.4	<p><u>Record Keeping Requirements:</u> Note: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request: (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and (2) a log with records of the dates and description of maintenance activity performed. [Reference: COMAR 26.11.03.06C]</p>
3.5	<p><u>Reporting Requirements:</u></p> <p>A. <u>Visible Emissions Limitations</u> COMAR 26.11.01.07C – Report of Excess Emissions “(1) In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone. (2) Telephone reports of excess emissions shall include the following information: (a) The identity of the installation and the person reporting; (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides); (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and (d) The actual or probable cause of the excess emissions.”</p>

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Table IV – 3	
	<p>B. <u>Control of Particulate Matter</u> See Record Keeping Requirements.</p>

“A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above.”

Table IV – 4	
4.0	<p><u>Emissions Unit Number(s): R29-3, 4; S7B-2; S7-12; S7-13, & S7-14</u></p> <p>R29-3: Melter Feed R29-4: Diatomite Fugitives S7B-2: Bin Tower Rejects Box (MDE Reg. No. 8-0212) S7-12: Maltodex Supersack Unloading System (MDE Reg. No. 8-0266) S7-13: Remelt Shredder Fugitives S7-14: Magnets Tailings Fugitives (MDE Reg. No. 8-0223)</p>
4.1	<p><u>Applicable Standards/Limits:</u></p> <p>A. <u>Control of Visible Emissions</u> COMAR 26.11.06.02 - Visible Emission Standards. C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.” A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”</p> <p>B. <u>Control of Particulate Matter</u> COMAR 26.11.06.03B(2) - Particulate Matter from Confined Sources. “(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”</p>

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Table IV – 4	
4.2	<p><u>Testing Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Monitoring Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Monitoring Requirements.</p>
4.3	<p><u>Monitoring Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation. If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:</p> <ol style="list-style-type: none"> (1) Inspect all process and/or control equipment that may affect visible emissions; (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated; (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. <p>[Reference: COMAR 26.11.03.06]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. [Reference: COMAR 26.11.03.06]</p>
4.4	<p><u>Record Keeping Requirements:</u></p> <p><u>Note:</u> All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]</p>

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Table IV – 4	
	<p>A. <u>Control of Visible Emissions</u> The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request: (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and (2) a log with records of the dates and description of maintenance activity performed. [Reference: COMAR 26.11.03.06C]</p>
4.5	<p><u>Reporting Requirements:</u></p> <p>A. <u>Visible Emissions Limitations</u> See Record Keeping Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Record Keeping Requirements.</p>

“A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above.”

Table IV – 5	
5.0	<p><u>Emissions Unit Number(s): D28-1; D10-1; D10-2; D10-3</u></p> <p><u>Carbonation System:</u> D28-1: Lime silo equipped with a baghouse (RP-C-1). (MDE Reg. No. 8-0301) D10-1: Saturator 1 equipped with a demister and a scrubber (RP-C-2). (MDE Reg. No. 8-0301) D10-2: Saturator 2 equipped with a demister and a scrubber (RP-C-3). (MDE Reg. No. 8-0301) D10-3: Saturator 3 equipped with a demister and a scrubber (RP-C-4). (MDE Reg. No. 8-0301)</p>

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Table IV – 5	
5.1	<p><u>Applicable Standards/Limits:</u></p> <p>A. <u>Control of Visible Emissions</u> COMAR 26.11.06.02 - Visible Emission Standards. C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.” A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”</p> <p>B. <u>Control of Particulate Matter</u> COMAR 26.11.06.03B(2) - Particulate Matter from Confined Sources. “(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”</p>
5.2	<p><u>Testing Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Monitoring Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Monitoring Requirements.</p>
5.3	<p><u>Monitoring Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation. If visible emissions in the exhaust gases are visible, the Permittee shall perform the following: (1) Inspect all process and/or control equipment that may affect visible emissions;</p>

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	<p>(2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;</p> <p>(3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and</p> <p>(4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. [Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. [Reference: COMAR 26.11.03.06C]</p>
5.4	<p><u>Record Keeping Requirements:</u> Note: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request: (1) a copy of the preventative maintenance plan for each dust collector; (2) records of the dust collector malfunction, and the corrective action taken to bring it back into proper operation; and (3) a log with records of the dates and description of maintenance activity performed. [Reference: COMAR 26.11.03.06C]</p>
5.5	<p><u>Reporting Requirements:</u></p> <p>A. <u>Visible Emissions Limitations</u> See Record Keeping Requirements.</p>

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Table IV – 5	
	<p>B. <u>Control of Particulate Matter</u> See Record Keeping Requirements.</p>

“A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above.”

Table IV – 6	
6.0	<p><u>Emissions Unit Number(s): D2-1 & U5-1</u></p> <p>D2-1: Mud Loading (MDE Reg. No.8-0301).</p> <p>U5-1: Cooling Tower (MDE Reg. No. 8-0383).</p>
6.1	<p><u>Applicable Standards/Limits:</u></p> <p>A. <u>Control of Visible Emissions</u> COMAR 26.11.06.02 - Visible Emission Standards. C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.” A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”</p> <p>B. <u>Control of Particulate Matter</u> COMAR 26.11.06.03C(1) - Particulate Matter from Unconfined Sources. “A person may not cause or permit emissions from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions. In making this determination, the Department shall consider technological feasibility, practicality, economic impact, and the environmental consequences of the decision.”</p>

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Table IV – 6	
6.2	<p><u>Testing Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Monitoring Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Monitoring Requirements.</p>
6.3	<p><u>Monitoring Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation. If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:</p> <ol style="list-style-type: none"> (1) Inspect all process and/or control equipment that may affect visible emissions; (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated; (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. <p>[Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. [Reference: COMAR 26.11.03.06C]</p>
6.4	<p><u>Record Keeping Requirements:</u></p> <p><u>Note:</u> All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]</p>

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Table IV – 6	
	<p>A. <u>Control of Visible Emissions</u> The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request: (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and (2) a log with records of the dates and description of maintenance activity performed. [Reference: COMAR 26.11.03.06C]</p>
6.5	<p><u>Reporting Requirements:</u></p> <p>A. <u>Visible Emissions Limitations</u> See Record Keeping Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Record Keeping Requirements.</p>

“A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above.”

Table IV – 7	
7.0	<p><u>Emissions Unit Number(s): S5-1 thru S5-6; S5-8A thru S5-8G; S7A-1; S7-5 thru S7-7; S7-8A thru S7-8D; S7-10A & S7-10B; S7B-1, S7-11A thru S7-11C.</u></p> <p>S5-1: Scrap Melter 1 equipped with a rotoclone scrubber(RP-C-10). (MDE Reg. No. 8-0226) S5-2: Scrap Melter 2 (MDE Reg. No. 8-0382) S5-3: Remelt Screw Conveyors (MDE Reg. No. 8-0382)</p> <p>S5-4: Invert system controlled by a rotoclone scrubber (RP-C-10). This system consists of the following equipment: [S5-4A – Invert Cloudy Tank (5-3-16)]</p>

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Table IV – 7	
	<p>S5-4B – Invert Precoat Tank (5-3-17) S5-4C – Sucrose Cloudy Tank (5-3-13) S5-4D – Sucrose Precoat Tank (5-3-14) S5-4E – Clear Sucrose Tank (5-3-12) S5-4F – Clear Invert Tank (5-3-15)]. (MDE Reg. No. 6-2022)</p> <p>S5-5: Caustic Fugitives associated with the invert system. (MDE Reg. No. 6-2022) S5-6: Soft Sugar Shredder. (MDE Reg. No. 6-2020) S5-8A-B: Two (2) Dryers (Powdered Specialty Sugars) each equipped with a venturi scrubber (DW-1) (RP-C-33), (DW-2) (RP-C-34). S5-8D: Liquid Sugar Cooler (Powdered Specialty Sugars) equipped with a Sly venturi scrubber (WS-1) (RP-C-35). S5-8E: Three (3) Centrifugal Separators (Powdered Specialty Sugars) equipped with a Sly venturi scrubber (WS-1) (RP-C-36). S5-8F: Washout Tanks and Beater controlled by a Rotoclone. S5-8G: Packaging and Conveying Equipment controlled by a Sly venturi scrubber (WS-1) (RP-C-36). (MDE Reg. No. 8-0332)</p> <p>S1-1: FEECO Rotary sugar dryer equipped with an Entoleter vortex scrubber (RP-C-15) (MDE Reg. No. 0320)</p> <p>S7A-1: Bulk Sugar Conveying System equipped with a scrubber (RP-C-25). This system consists of the following equipment: [S7A-RE1 – Bucket Elevator RE-1, S7A-XE1 – Bucket Elevator XE-1, S7A-XRS1 – Bucket Elevator XRS-1, S7A-UE1 – Bucket Elevator UE-1, S7A-UE2A – Bucket Elevator UE-2A, S7A-UE2B – Bucket Elevator UE-2B, S7A-RE2 – Bucket Elevator RE-2, S7A-U1 – Storage Bin U1, S7A-U2 – Storage Bin U2, S7A-U3 – Storage Bin U3, S7A-U4 – Storage Bin U4, S7A-U5 – Storage Bin U5, S7A-U6 – Storage Bin U6, S7A-XF1 – Storage Bin XF1, S7A-XF2 – Storage Bin XF2, S7A-V1 – Storage Bin V1, S7A-V2 – Storage Bin V2,</p>

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	<p>S7A-V3 – Storage Bin V3, S7A-V4 – Storage Bin V4, S7A-V5 – Storage Bin V5, S7A-V6 – Storage Bin V6, S7A-C1 – Storage Bin C1, S7A-F1 – Storage Bin F1, S7A-AR1 – Storage Bin AR1, S7A-AR2 – Storage Bin AR2, S7A-AR3 – Storage Bin AR3, S7A-AR4 – Storage Bin AR4, S7A-AR5 – Storage Bin AR5, S7A-AR6 – Storage Bin AR6, S7A-AR7 – Storage Bin AR7, S7A-AR8 – Storage Bin AR8, and S7A-RJX – Screw Conveyor Rejects Transfer]. (MDE Reg. No. 8-0212)</p> <p>S7-5, S7-6, S7-7: Packaging Feed Tanks each equipped with a filter (RP-C-26, -27 & -28, respectively). (MDE Reg. No. 8-0265)</p> <p>S7-8: Packaging Operations controlled by a rotoclone scrubber (7-6-1) (RP-C-29). This system consists of the following equipment: [S7-8A: Fawema Packaging System, S7-8B: Paxall Packaging System, S7-8C: Clouds Packaging System, and S7-8D: Handi Pak System]. (MDE Reg. No. 8-0265)</p> <p>S7-10: Packaging System controlled by a Wheelabrator dust collector (7-5-1) (RP-C-30). [S7-10A: Hesser Bagging System. S7-10B: Supersack Unloading System]. (MDE Reg. No. 8-0265)</p> <p>S7B-1: Bulk Loading System with an Entoleter scrubber (RP-C-31) and DCL UN800 Dust Collectors. (MDE Reg. No. 8-0223)</p> <p>S7-11: Super-Sack Sugar Packaging Line controlled by Wheelabrator dust collectors. [S7-11A: Thiele Supersack System, S7-11B: Tub Packaging Line controlled by Wheelabrator 7-5-2 (RP-C-30), and S7-11C: Simplex Packaging Line controlled by a Wheelabrator dust collector 6-5-1 (RP-C-12)]. (MDE Reg. No. 8-0287)</p>

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7.1	<p><u>Applicable Standards/Limits:</u></p> <p>A. <u>Control of Visible Emissions</u> COMAR 26.11.06.02 - Visible Emission Standards. C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.” A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”</p> <p>B. <u>Control of Particulate Matter</u> COMAR 26.11.06.03B - Particulate Matter from Confined Sources. “(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”</p> <p>COMAR 26.11.06.03D - Particulate Matter from Materials Handling and Construction. “A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer: (1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land. (2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts. (3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations. (4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would covering the vehicles. (5) The paving of roadways and their maintenance in clean condition.</p>

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	(6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water.”
7.2	<p><u>Testing Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Monitoring Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Monitoring Requirements.</p>
7.3	<p><u>Monitoring Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation. If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:</p> <ol style="list-style-type: none"> (1) Inspect all process and/or control equipment that may affect visible emissions; (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated; (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. <p>[Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u> (1) The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. [Reference: COMAR 26.11.03.06C]</p>

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	<p>(2) The exhaust gases from two liquid sugar dryers (VD1 and VD-2), the liquid sugar coolers (VC-1) and three centrifugal separators (SK-1, SK-2, and SK-3) shall be vented through the cyclonic separator and the venturi scrubber, when the specialty sugar refining process is operating.</p> <p>(3) The exhaust gases from the washout tanks/beater shall be vented through the rotoclone scrubber when the specialty sugar refining process is operating.</p> <p>(4) The exhaust gases from the packing and conveying equipment shall be vented through the rotoclone and the venturi scrubber when the specialty sugar refining process is operating.</p> <p>[Reference: MDE Permit to Construct #510-8-0332 (July 10, 2003)].</p>
7.4	<p><u>Record Keeping Requirements:</u></p> <p><u>Note:</u> All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u> (1) The Permittee shall maintain records of the amount and type of specialty sugar produced each month for the specialty sugar refining process equipped with four venturi scrubbers shall be kept at the site for at least five (5) years and shall be made available to the Department upon request. [Reference: MDE Permit to Construct #510-8-0332 (July 10, 2003)].</p> <p>(2) The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:</p> <ul style="list-style-type: none"> (a) a copy of the preventative maintenance plan for each dust collector; (b) records of the dust collector malfunction, and the corrective action taken to bring it back into proper operation; and (c) a log with records of the dates and description of maintenance activity performed. <p>[Reference: COMAR 26.11.03.06C]</p>

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7.5	<u>Reporting Requirements:</u> A. <u>Visible Emissions Limitations</u> See Record Keeping Requirements. B. <u>Control of Particulate Matter</u> See Record Keeping Requirements.

“A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above.”

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8.0	<u>Emissions Unit Number(s): S6-4 thru S6-7.</u> <p>S6-4: BMA Granulator equipped with an Entoleter Scrubber (RP-C-11). (MDE Reg. No. 8-0115)</p> <p>S6-5: Sugar Packaging Line and Conveying Systems controlled by a shared Wheelabrator dry filter (RP-C-12, RP-C-13, and RP-C-14). This line consists of the following equipment: [S6-5A: Remelt Shredder, S6-5B: Maltrin Tank, S6-5C: Sugar Tank, S6-5D: MFB Feeder, S6-5E : Sugar Feed to Mill 1, S6-5F: Sugar Feed to Mill 2, S6-5G: Sugar Feed to Mill 3, S6-5H: 6-5-1200 Receiver, S6-5I: UB-1 South Hood, and S6-5J: UB-1 Tail End]. (MDE Reg. No. 8-0222)</p> <p>S6-6: Sugar Packaging Line and Conveying Systems controlled by a shared Wheelabrator dry filter (RP-C-12, RP-C-13, and RP-C-14). This line consists of the following equipment: [S6-6A: Oscillator, S6-6B: DSE-1 (9-25-10), S6-6C: US-2 Scroll, and S6-6D: UB-1 North]. (MDE Reg. No. 8-0296)</p>

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	<p>S6-7: Sugar Packaging Line and Conveying Systems controlled by a shared Wheelabrator dry filter (RP-C-12, RP-C-13, and RP-C-14). [S6-7A: Receiver 1300 2#, S6-7B: Old V. Bag Packaging System, S6-7C: Receiver 1250, S6-7D: Receiver 6-4-1300, S6-7E: 2# Poly Filler System, S6-7F: New V.B. Filler System, S6-7G: Old V.B. Filler System, S6-7H: Packet Grinder, and S6-7I: 1-4 10X Filler System]. (MDE Reg. No. 8-0225) [S6-7J: Bulkline (Super sack: 1-ton bag) Packaging Line]. (MDE Reg. No. 8-0409}</p>
8.1	<p><u>Applicable Standards/Limits:</u></p> <p>A. <u>Control of Visible Emissions</u> COMAR 26.11.06.02 - <u>Visible Emission Standards.</u> C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.” A(2) <u>General Exceptions.</u> “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”</p> <p>B. <u>Control of Particulate Matter</u> COMAR 26.11.06.03B - <u>Particulate Matter from Confined Sources.</u> “(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”</p> <p>COMAR 26.11.06.03D - <u>Particulate Matter from Materials Handling and Construction.</u> “A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming</p>

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	<p>airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:</p> <p>(1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.</p> <p>(2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts.</p> <p>(3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.</p> <p>(4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would covering the vehicles.</p> <p>(5) The paving of roadways and their maintenance in clean condition.</p> <p>(6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water.”</p>
8.2	<p><u>Testing Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Monitoring Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Monitoring Requirements.</p>
8.3	<p><u>Monitoring Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation. If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:</p> <p>(1) Inspect all process and/or control equipment that may affect visible emissions;</p> <p>(2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;</p>

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	<p>(3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and</p> <p>(4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. [Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u></p> <p>(1) The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. [Reference: COMAR 26.11.03.06C]</p> <p>(2) The exhaust gases from the packing and conveying equipment shall be vented through the rotoclone and the venturi scrubber when the specialty sugar refining process is operating. [Reference: MDE Permit to Construct #510-0314-8-0409 (June 19, 2020)].</p>
8.4	<p><u>Record Keeping Requirements:</u> Note: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall maintain for at least five (5) years and make available to the Department upon request: a record of the results of the monthly inspections and the log of inspection and maintenance; and a log with records of the dates and description of maintenance activities performed. [Reference: COMAR 26.11.03.06C & MDE Permit to Construct #510-0314-8-0409 (June 19, 2020)]</p> <p>B. <u>Control of Particulate Matter</u></p> <p>(1) The Permittee shall maintain records of the amount and type of specialty sugar produced each month for the specialty sugar refining process equipped with four venturi scrubbers shall be kept at the site for at least five (5) years and shall be made available to the Department upon request. [Reference: MDE Permit to Construct #510-0314-8-0409 (June 19, 2020)].</p>

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	<p>(2) The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:</p> <p>(a) a copy of the preventative maintenance plan for each dust collector;</p> <p>(b) records of the dust collector malfunction, and the corrective action taken to bring it back into proper operation; and</p> <p>(c) a log with records of the dates and description of maintenance activity performed.</p> <p>[Reference: COMAR 26.11.03.06C]</p>
8.5	<p><u>Reporting Requirements:</u></p> <p>A. <u>Visible Emissions Limitations</u> COMAR 26.11.01.07C – Report of Excess Emissions “(1) In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone. (2) Telephone reports of excess emissions shall include the following information: (a) The identity of the installation and the person reporting; (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides); (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and (d) The actual or probable cause of the excess emissions.”</p> <p>B. <u>Control of Particulate Matter</u> See Record Keeping Requirements.</p>

“A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above.”

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9.0	<p><u>Emissions Unit Number(s): S6-1, S6-1A, S6-2, S6-2A, S6-3, S6-3A, S6-8, & S6-9.</u></p> <p>S6-1: Sugar Mill 1 equipped with MAC dry filter (RP-C-16) (MDE Reg. No. 8-0209).</p>

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	<p>S6-1A: Starch Receiver 1 equipped with a dry filter (RP-C-17). (MDE Reg. No. 8-0209)</p> <p>S6-2: Sugar Mill 2 equipped with MAC dry filter (RP-C-18) (MDE Reg. No. 8-0209).</p> <p>S6-2A: Starch Receiver 2 equipped with a dry filter (RP-C-19). (MDE Reg. No. -8-0209)</p> <p>S6-3: Sugar Mill 3 equipped with MAC dry filter (RP-C-20) (MDE Reg. No. 8-0125).</p> <p>S6-3A: Starch Receiver 3 equipped with a dry filter (RP-C-21). (MDE Reg. No. 8-0125)</p> <p>S6-8: Sugar Pulverizer (Mill 7) equipped with a Mikropul baghouse (RP-C-24). (MDE Reg. No. 8-0266)</p> <p>S6-9: Starch Bin equipped with a vent filter (RP-C-22). (MDE Reg. No. 8-0125)</p>
9.1	<p><u>Applicable Standards/Limits:</u></p> <p>A. <u>Control of Visible Emissions</u> COMAR 26.11.06.02 - Visible Emission Standards. C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.” A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”</p> <p>B. <u>Control of Particulate Matter</u> COMAR 26.11.06.03B - Particulate Matter from Confined Sources. “(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).” COMAR 26.11.06.03D - Particulate Matter from Materials Handling and Construction. “A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming</p>

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	<p>airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:</p> <p>(1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.</p> <p>(2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts.</p> <p>(3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.</p> <p>(4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would covering the vehicles.</p> <p>(5) The paving of roadways and their maintenance in clean condition.</p> <p>(6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water.”</p>
9.2	<p><u>Testing Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Monitoring Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Monitoring Requirements.</p>
9.3	<p><u>Monitoring Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation. If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:</p> <p>(1) Inspect all process and/or control equipment that may affect visible emissions;</p> <p>(2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;</p>

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	<p>(3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and</p> <p>(4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. [Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. [Reference: COMAR 26.11.03.06C]</p>
9.4	<p><u>Record Keeping Requirements:</u> Note: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request: (a) a copy of the preventative maintenance plan for each dust collector; (b) records of the dust collector malfunction, and the corrective action taken to bring it back into proper operation; and (c) a log with records of the dates and description of maintenance activity performed. [Reference: COMAR 26.11.03.06C]</p>
9.5	<p><u>Reporting Requirements:</u></p> <p>A. <u>Visible Emissions Limitations</u> See Record Keeping Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Record Keeping Requirements.</p>

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“A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above.”

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10.0	<p><u>Emissions Unit Number(s): S5-7, S7-15, & S7-16.</u></p> <p>S5-7: Ten (10) Evaporation Pans (Pan 1 thru 9 and 11) (MDE Reg. No. 6-2021) S7-15: Packaging Video Inkjet Printers (MDE Reg. No. 6-0218) S7-16: Packaging Adhesive Fugitives (MDE Reg. No. 9-1298).</p>
10.1	<p><u>Applicable Standards/Limits:</u></p> <p>A. <u>Control of Visible Emissions</u> COMAR 26.11.06.02 - Visible Emission Standards. C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.” A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”</p> <p>B. <u>Control of VOC Emissions</u> Video Inkjet Packaging Lines- S7-15 (MDE Reg. No. 6-2018) COMAR 26.11.09.02I. - Good Operating Practices, Equipment Cleanup, and VOC Storage. “(1) <u>Applicability.</u> The requirements in this section apply to a person who owns or operates an installation that is subject to any requirement in this chapter. (2) <u>Good Operating Practices.</u> (a) A person who is subject to this section shall implement good operating practices to minimize VOC emissions into the atmosphere. (b) Good operating practices shall, at a minimum, include the following: (i) Provisions for training of operators on practices, procedures, and maintenance requirements that are consistent with the equipment manufacturers' recommendations and the source's experience in</p>

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	<p>operating the equipment, with the training to include proper procedures for maintenance of air pollution control equipment;</p> <p>(ii) Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use;</p> <p>(iii) Minimize spills of VOC-containing cleaning materials;</p> <p>(iv) Convey VOC-containing cleaning materials from one location to another in closed containers or pipelines;</p> <p>(v) Minimize VOC emissions from cleaning of storage, mixing, and conveying equipment;</p> <p>(vi) As practical, scheduling of operations to minimize color or material changes when applying VOC coatings or other materials by spray gun;</p> <p>(vii) For spray gun applications of coatings, use of high-volume low pressure (HVLP) or other high efficiency application methods where practical; and</p> <p>(viii) As practical, mixing or blending materials containing VOC in closed containers and taking preventive measures to minimize emissions for products that contain VOC.</p> <p>(c) A person subject to this regulation shall:</p> <p>(i) Establish good operating practices in writing;</p> <p>(ii) Make the written operating practices available to the Department upon request; and</p> <p>(iii) Display the good operating practices so that they are clearly visible to the operator or include them in operator training.</p> <p>(3) <u>Equipment Cleanup.</u></p> <p>(a) A person subject to this section shall take all reasonable precautions to prevent or minimize the discharge of VOC into the atmosphere when cleaning process and coating application equipment, including containers, vessels, tanks, lines, and pumps.</p> <p>(b) Reasonable precautions for equipment cleanup shall, at a minimum, include the following:</p> <p>(i) Storing all wastes and waste materials, including cloth and paper that are contaminated with VOC, in closed containers;</p> <p>(ii) Preparing written standard operating procedures for frequently cleaned equipment, including when practical, provisions for the use of low-VOC or non-VOC materials and procedures to minimize the quantity of VOC materials used;</p> <p>(iii) Using enclosed spray gun cleaning, VOC-recycling systems and other spray gun cleaning methods where practical that reduce or eliminate VOC emissions; and</p> <p>(iv) Using, when practical, detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines, containers, and process equipment.</p>
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	<p>(4) <u>VOC Storage and Transfer.</u></p> <p>(a) A person subject to this section who stores VOCs shall, at a minimum, install conservation vents or other vapor control measures on storage tanks with a capacity of 2,000 gallons or more to minimize VOC emissions.</p> <p>(b) A person subject to this section shall, at a minimum, utilize vapor balance, vapor control lines, or other vapor control measures when VOCs are transferred from a tank truck into a stationary storage tank with a capacity greater than 10,000 gallons and less than 40,000 gallons that store VOCs or materials containing VOCs, other than gasoline, that have a vapor pressure greater than 1.5 psia.”</p> <p>COMAR 26.11.19.16C. - <u>General Requirements.</u></p> <p>“A person subject to this regulation shall comply with all of the following requirements:</p> <p>(1) Visually inspect all components on the premises for leaks at least once each calendar month.</p> <p>(2) Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date the leak was discovered, and the name of the person who discovered the leak. The tag shall remain in place until the leak has been repaired.</p> <p>(3) Take immediate action to repair all observed VOC leaks that can be repaired within 48 hours.</p> <p>(4) Repair all other leaking components not later than 15 days after the leak is discovered. If a replacement part is needed, the part shall be ordered within 3 days after discovery of the leak, and the leak shall be repaired within 48 hours after receiving the part.</p> <p>(5) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipe fittings.</p> <p>(6) Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, and a list of leaks by tag identification number. The log shall be made available to the Department upon request. Leak records shall be maintained for a period of not less than 2 years from the date of their occurrence.”</p> <p>COMAR 26.11.19.06D. <u>Exceptions.</u> “Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, shall be identified</p>

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in the log and included within the source's maintenance schedule for repair during the next source shutdown.”

COMAR 26.11.19.18B. Applicability.

“(1) This regulation applies to a person, owner, or operator who:

(d) Performs screen printing on untreated sign paper at a premises that causes VOC emissions of 20 pounds or more per day from all printing on untreated sign paper at the premises.”

F. General Requirements for Digital Imaging.

“A person who owns or operates digital imaging that is subject to this regulation may not cause the discharge of VOC emissions into the atmosphere in excess of 100 pounds on any day from all digital printing at the premises.”

COMAR 26.11.35 – VOC from Adhesives and Sealants

Packaging Adhesive Fugitive Lines S7-16 (MDE Reg. No. 9-1298)

COMAR 26.11.35.01 – Applicability and Exemptions

E. “The provisions of Regulation .04A and D of this chapter do not apply to the use of adhesives, sealants, adhesive primers, sealant primers, cleanup solvents, and surface preparation solvents if:

(1) The total volume of noncomplying adhesives, sealants, primers, cleanup solvents, and surface preparation solvents applied facility-wide does not exceed 55 gallons per calendar year; and

(2) The person claiming the usage exemption under §E(1) of this regulation maintains monthly operational records sufficient to demonstrate compliance as required by Regulation .05A of this chapter.

Note: In any calendar year in which ASR uses more than 55 gallons of packaging adhesives, ASR must meet the requirements of COMAR 26.11.35.04A and C.

COMAR 26.11.35.04 - Standards.

A.” Except as provided in §E of this regulation and Regulation .01 of this chapter, on and after January 1, 2009, a person may not:

(3) Use or apply an adhesive, sealant, adhesive primer, or sealant primer within the State that exceeds the applicable VOC content limits specified in Table 1.”

COMAR 26.11.35.04G - Table 1.

VOC Content Limits for Adhesives, Sealants, Adhesive Primers, Sealant Primers, and Adhesives Applied to Particular Substrates	
Adhesive, sealant, adhesive primer, or sealant primer	VOC content limit

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Category	VOC (grams per liter*)	VOC (pounds per gallon*)
Adhesives Applied to the Listed Substrate		
Porous material	120	1.00

* The VOC content is determined as the weight of volatile compounds, less water and exempt compounds, as specified in Regulation .06 of this chapter.

COMAR 26.11.35.04C. - Surface Preparation or Cleanup Solvent.

- “(1) This section applies to a person subject to this chapter using a surface preparation or cleanup solvent.
- (2) Except as provided in §C(3) of this regulation for single-ply roofing, a person may not use materials for surface preparation containing VOCs unless the VOC content of the surface preparation solvent is less than 70 grams per liter.
- (3) If a surface preparation solvent is used in applying single-ply roofing, a person may not use materials for surface preparation containing VOCs unless the composite vapor pressure, excluding water and exempt compounds, of the surface preparation solvent does not exceed 45 millimeters of mercury at 20°C.
- (4) Except as provided in §C(5) of this regulation, a person may not use materials containing VOCs for the removal of adhesives, sealants, or adhesive or sealant primers from surfaces, other than spray application equipment, unless the composite vapor pressure of the solvent used is less than 45 millimeters of mercury at 20°C.
- (5) Removal of an adhesive, sealant, adhesive primer, or sealant primer from the parts of spray application equipment shall be performed as follows:
- (a) In an enclosed cleaning system or equivalent cleaning system as determined by the test method identified in Regulation .06H of this chapter;
- (b) Using a solvent with a VOC content less than or equal to 70 grams of VOC per liter of material; or
- (c) Parts containing dried adhesive may be soaked in a solvent if the composite vapor pressure of the solvent, excluding water and exempt compounds, is less than or equal to 9.5 millimeters of mercury at 20°C and the parts and solvent are in a closed container that remains closed except when adding parts to or removing parts from the container.”

COMAR 26.11.35.04E. “A person using adhesives, sealants, adhesive primers, sealant primers, surface preparation solvents, or cleanup solvents subject to this chapter shall store or dispose of all absorbent

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	<p>materials, such as cloth or paper, that are moistened with adhesives, sealants, primers, or solvents subject to this chapter in nonabsorbent containers that are closed except when placing materials in or removing materials from the container.”</p> <p>COMAR 26.11.35.04F. “A person may not solicit, require the use, or specify the application of an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent, or cleanup solvent if the use or application results in a violation of this chapter. This requirement applies to all written or oral contracts under which an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent, or cleanup solvent subject to this chapter is to be used at a location in the State.”</p>
10.2	<p><u>Testing Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Reporting Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Monitoring Requirements.</p>
10.3	<p><u>Monitoring Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Reporting Requirements.</p> <p>B. <u>Control VOC Emissions</u> <i>Video Inkjet Packaging Lines: S7-15 (MDE Reg. No. 6-2018)</i> The Permittee shall conduct facility-wide inspections at least once per calendar month to determine the compliance status of facility operations with regard to implementation of “good operating practices” designed to minimize emissions of VOC. [Reference: COMAR 26.11.03.06C]</p> <p>The Permittee shall:</p> <ol style="list-style-type: none"> (1) Visually inspect all components (process equipment, storage tanks, pumps, compressors, valves, flanges, pipeline fittings, pressure relief valves) at the facility for VOC leaks at least once each calendar month; (2) Tag any VOC leak immediately with I.D. Number, the date VOC leak was discovered, and the name of the person who discovered the VOC leak. The tag is to remain in place until the VOC leak is repaired; (3) Take immediate action to repair/control all observed VOC leaks that can be repaired within 48 hours;

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	<p>(4) Repair all other VOC leaking components not later than 15 days after the VOC leak is discovered in accordance with COMAR 26.11.19.16C(4);</p> <p>(5) If a replacement part is needed, it shall be ordered within 3 days after discovery of the VOC leak and the leak shall be repaired within 48 hours after receiving the part;</p> <p>(6) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced; and</p> <p>(7) Identify in a log, components that cannot be repaired as required by this regulation because they are inaccessible, or that cannot be repaired during operation of the source and include them within the source's maintenance schedule for repair during the next source shutdown. [Reference: COMAR 26.11.19.16C and D]</p> <p><i>Packaging Adhesive Fugitive lines only (MDE Reg. No. 510-0314-9-1298)</i></p> <p>(1) The Permittee shall not use any adhesive with a VOC content of greater than 1.0 pound per gallon (120 grams per liter). The VOC content is determined as the weight of volatile compounds, less water and exempt compounds as specified in COMAR 26.11.36.06. [Reference: COMAR 26.11.35.04G, Table 1, footnote]</p> <p>(2) The Permittee shall not use materials for surface preparation containing VOCs unless the VOC content of the surface preparation solvent is less than 70 grams per liter. [Reference: COMAR 26.11.36.04C(2)]</p> <p>(3) The Permittee shall not use materials containing VOCs for the removal of adhesives, sealants, or adhesive or sealant primers from surfaces other than spray application equipment, unless the composite vapor pressure of the solvent used is less than 45 millimeters of mercury at 20°C. Removal of an adhesive sealant, adhesive primer, or sealant primer from the parts of spray application equipment shall be performed according to COMAR 26.11.36.04C(5). [Reference: COMAR 26.11.36.04C(4) and (5)]</p> <p>(5) The Permittee shall store or dispose of all absorbent materials, such as cloth or paper, that are moistened with adhesives, sealants, primers, or solvents subject to COMAR 26.11.36 in nonabsorbent containers that are closed except when placing materials in or</p>

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	removing materials from the container. [Reference: COMAR 26.11.36.04E]
10.4	<p><u>Record Keeping Requirements:</u> Note: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p>A. <u>Control of Visible Emissions</u> See Reporting Requirements.</p> <p>B. <u>Control of VOC Emissions</u> <i>Video Inkjet Packaging Lines S7-15 (MDE Reg. No. 6-2018)</i> The Permittee shall maintain: (a) Written descriptions of all “good operating practices” designed to minimize emissions of VOC from facility-wide operations. [Reference: COMAR 26.11.19.02I] (b) Records of all inspections conducted to determine the facility’s compliance status with regard to implementation of “good operating practices” designed to minimize emissions of VOC from facility-wide operations. The records shall include for each inspection the name of the inspector, the date and time of the inspection, and an account of the findings. [Reference: COMAR 26.11.03.06C]</p> <p>The Permittee shall: (a) Maintain a log that includes the name of the person conducting the inspection, the date on which VOC leak inspection was made, the findings of the inspection, a list of VOC leaks by tag identification number, the date the part was ordered, and the date the VOC leak was repaired; and (b) Make the log available to the Department upon request and shall be maintained for a period of not <u>less</u> than two years from the date of the VOC leaks’ occurrence. [Reference: COMAR 26.11.19.16C(6)]</p> <p>COMAR 26.11.19.18G - <u>Record Keeping.</u> “A person subject to this regulation shall maintain the following records for not less than 3 years and make the records available to the Department upon request: (3) The VOC content of each ink, coating, cleanup material, or any other material containing VOC that is used at the premises.</p>

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10.5	<p><u>Reporting Requirements:</u></p> <p>A. <u>Visible Emissions Limitations</u> The Permittee shall report all occurrences of excess emissions to the Department. [Reference: COMAR 26.11.01.07].</p> <p>B. <u>Control of VOC Emissions</u> <i>Video Inkjet Packaging Lines S7-15 (MDE Reg. No. 6-2018)</i> Good operating practices information as required by COMAR 26.11.19.02I shall be made available to the Department upon request.</p> <p>VOC Leak inspection logs as required by COMAR 26.11.19.16 shall be made available to the Department upon request.</p> <p><i>Packaging Adhesive Fugitive lines only S7-16 (MDE Reg. No. 510-0314-9-1298)</i> The Permittee shall report all occurrences of excess emissions to the Department. [Reference: COMAR 26.11.01.07]</p>

“A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above.”

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11.0	<p><u>Emissions Unit Number(s): D3-6 thru D3-11</u></p> <p><u>Ion Exchange System</u> D3-6: Scrubber (25-gpm once through). D3-6A: HCl Tank (8450-gallons equipped with scrubber D3-6). D3-7: Resin Acid Wash Tank (12,924 gallons). D3-8: Clean in Place (CIP) Tank (734 gallons). D3-9A, B, C, D: Four (4) Deashing Resin Beds (10, 574 gallons each). D3-10A, B, C, D: Four (4) Decolorized Resin Beds (23,603 gallons each). D3-11A, B: Two (2) salt saturators controlled by water spray chamber (D3-11). D3-12: HCl equipment leak components (valves/pumps/ connectors). (MDE Reg. No. 510-0314-8-0386).</p>

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11.1	<p><u>Applicable Standards/Limits:</u></p> <p>A. <u>Control of Visible Emissions</u> COMAR 26.11.06.02 - Visible Emission Standards. C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.” A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”</p> <p>B. <u>Control of Particulate Matter</u> COMAR 26.11.06.03B - Particulate Matter from Confined Sources. “(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”</p> <p>COMAR 26.11.06.03C - Particulate Matter from Unconfined Sources. “(1) A person may not cause or permit emissions from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions. In making this determination, the Department shall consider technological feasibility, practicality, economic impact, and the environmental consequences of the decision.”</p> <p>COMAR 26.11.06.03D - Particulate Matter from Materials Handling and Construction. “A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer: (1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.</p>

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	<p>(2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts.</p> <p>(3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.</p> <p>(4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would covering the vehicles.</p> <p>(5) The paving of roadways and their maintenance in clean condition.</p> <p>(6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water.”</p>
11.2	<p><u>Testing Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Record Keeping Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Record Keeping Requirements.</p>
11.3	<p><u>Monitoring Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Record Keeping Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Record Keeping Requirements.</p>
11.4	<p><u>Record Keeping Requirements:</u></p> <p><u>Note:</u> All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall maintain at the facility for at least five (5) years and make them available to the Department upon request records necessary to support annual certifications of emissions. [Reference: COMAR 26.11.03.06C]</p>

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	<p>B. <u>Control of Particulate Matter</u> The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:</p> <ul style="list-style-type: none">(a) Annual HCl throughput for each tank and resin bed.(b) Annual salt throughput for each salt saturator.(c) All written descriptions of “good operating practices” designed to minimize emissions of HAP.(d) HAP leak detection and repair logs that include identification of the persons who conducted the leak detection inspections, the dates on which the inspections were conducted, the findings during the inspections, a listing by tag identification number and a description of all leaks discovered, and the date and nature of all leak repairs effected. <p>[Reference: MDE Permit to Construct No. 510-0314-8-0386 (November 18, 2013)]</p>
11.5	<p><u>Reporting Requirements:</u></p> <p>A. <u>Visible Emissions Limitations</u> The Permittee shall submit to the Department by April 1 of each year a certification of emissions for the previous calendar year.</p> <p>The Permittee shall report all occurrences of excess emissions to the Department. [Reference: COMAR 26.11.01.07]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall submit to the Department by April 1 of each year a certification of emissions for the previous calendar year.</p> <p>The Permittee shall report all occurrences of excess emissions to the Department. [Reference: COMAR 26.11.01.07]</p>

“A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above.”

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12.0	<p><u>Emissions Unit Number(s): S1, S2, S3 & S4</u></p> <p>S1, S2, S3, S4: Four (4) 3.75-million-pound sugar storage silos equipped with bin vents (BV-1, BV-2, BV-3, BV-4) [MDE Reg. No. 510-0314-8-0411]</p>
12.1	<p><u>Applicable Standards/Limits:</u></p> <p>A. <u>Control of Visible Emissions</u> COMAR 26.11.06.02 - Visible Emission Standards. C(2)“In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.” A(2) General Exceptions. “The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”</p> <p>B. <u>Control of Particulate Matter</u> COMAR 26.11.06.03B - Particulate Matter from Confined Sources. “(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”</p> <p>COMAR 26.11.06.03D - Particulate Matter from Materials Handling and Construction. “A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer: (1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land. (2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dust.</p>

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	<p>(3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.</p> <p>(4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would covering the vehicles.</p> <p>(5) The paving of roadways and their maintenance in clean condition.</p> <p>(6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water.”</p>
12.2	<p><u>Testing Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> See Monitoring Requirements.</p> <p>B. <u>Control of Particulate Matter</u> See Monitoring Requirements.</p>
12.3	<p><u>Monitoring Requirements:</u></p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation. If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:</p> <ol style="list-style-type: none"> (1) Inspect all process and/or control equipment that may affect visible emissions; (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated; (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

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	<p>[Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. [Reference: COMAR 26.11.03.06C]</p>
12.4	<p><u>Record Keeping Requirements:</u> Note: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]</p> <p>A. <u>Control of Visible Emissions</u> The Permittee shall maintain at the facility for at least five (5) years and make them available to the Department upon request, records of the following: (1) A record of the results of the monthly inspections and the log of inspection and maintenance. (2) A log with records of the dates and description of maintenance activities performed. [Reference: COMAR 26.11.03.06C]</p> <p>B. <u>Control of Particulate Matter</u> The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request: (1) a copy of the preventative maintenance plan for each of the bin vents; (2) records of the bin vent malfunction, and corrective actions taken to bring it back into proper operation; and (3) a log with records of the dates and description of maintenance activities performed. [Reference: COMAR 26.11.03.06C]</p>
12.5	<p><u>Reporting Requirements:</u></p> <p>A. <u>Visible Emissions Limitations</u> The Permittee shall report, in accordance with the requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Administration. [Reference: COMAR 26.11.01.07]</p> <p>B. <u>Control of Particulate Matter</u> See Record Keeping Requirements.</p>

“A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above.”

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SECTION V INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

- (1) No. 1 Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

The 250-kW emergency generator is subject to the following requirements:

Emissions Unit Number(s): Emergency Generator

U11-2: 250-kW Emergency Generator. [MDE Reg. 9-1293]. Installed 2020.

Applicable Standards/Limits:

A. Control of Visible Emissions

COMAR 26.11.09.05E – Stationary Internal Combustion Engine Powered Equipment.

“(2) Emissions During Idle Mode. A person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.

(3) Emissions During Operating Mode. A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.

(4) Exceptions.

(a) Section E(2) of this regulation does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.

(b) Section E(2) of this regulation does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:

(i) Engines that are idled continuously when not in service: 30 minutes;

(ii) All other engines: 15 minutes.

(c) Section E(2) and (3) of this regulation do not apply while maintenance, repair, or testing is being performed by qualified mechanics.”

B. Control of Sulfur Oxides Emission

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Emissions Unit Number(s): Emergency Generator

U11-2: 250-kW Emergency Generator. [MDE Reg. 9-1293]. Installed 2020.

COMAR 26.11.09.07A(2) – Control of Sulfur Oxides from fuel burning equipment. “A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: In Areas III and IV: **(b) Distillate fuel oil, 0.3 percent.**”

C. Control of Nitrogen Oxides Emission

COMAR 26.11.09.08G. - Requirements for Fuel-Burning Equipment with a Capacity Factor of 15 Percent or Less, and Combustion Turbines with a Capacity Factor Greater than 15 Percent.

“(1) A person who owns or operates fuel-burning equipment with a capacity factor (as defined in 40 CFR Part 72.2) of 15 percent or less shall:

- (a) Provide certification of the capacity factor of the equipment to the Department in writing;
- (b) For fuel-burning equipment that operates more than 500 hours during a calendar year, perform a combustion analysis and optimize combustion at least once annually;
- (c) Maintain the results of the combustion analysis at the site for at least 2 years and make these results available to the Department and the EPA upon request;
- (d) Require each operator of an installation, except combustion turbines, to attend operator training programs at least once every 3 years, on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and
- (e) Maintain a record of training program attendance for each operator at the site and make these records available to the Department upon request.”

D. Control of HAPs

Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

§60.4200 - Am I subject to this subpart?

- (a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons as specified in paragraphs (a)(1) through (4) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.
- (1) Manufacturers of stationary CI ICE with a displacement of less than 30 liters per cylinder where the model year is: 2007 or later, for engines that are not fire pump engines.

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Emissions Unit Number(s): Emergency Generator

U11-2: 250-kW Emergency Generator. [MDE Reg. 9-1293]. Installed 2020.

§60.4205 - What emission standards must I meet for emergency engines if I am an owner or operator of a stationary CI internal combustion engine?

(b) Owners and operators of 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new nonroad CI engines in § 60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE.

Note: The Permittee shall satisfy the requirements above and §60.4202 by purchasing and installing engines certified at EPA Tier 2 or better.

§60.4207 - What fuel requirements must I meet if I am an owner or operator of a stationary CI internal combustion engine subject to this subpart?

(b) Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted.

§60.4209 - What are the monitoring requirements if I am an owner or operator of a stationary CI internal combustion engine?

If you are an owner or operator, you must meet the monitoring requirements of this section. In addition, you must also meet the monitoring requirements specified in § 60.4211.

(a) If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.

(b) If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in § 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.

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U11-2: 250-kW Emergency Generator. [MDE Reg. 9-1293]. Installed 2020.

§60.4211 - What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?

(a) If you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under paragraph (g) of this section:

- (1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;
- (2) Change only those emission-related settings that are permitted by the manufacturer; and
- (3) Meet the requirements of 40 CFR part 1068, as they apply to you.

(c) If you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in §60.4204(b) or §60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to this subpart and must comply with the emission standards specified in §60.4205(c), you must comply by purchasing an engine certified to the emission standards in §60.4204(b), or §60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in paragraph (g) of this section.

(f) If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (f)(1) through (3) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, and operation in nonemergency situations for 50 hours per year, as described in paragraphs (f)(1) through (3), is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (3), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

- (1) There is no time limit on the use of emergency stationary ICE in emergency situations.

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(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (f)(2)(i) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (f)(3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary ICE may be operated 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 beyond 100 hours per calendar year.

(ii) –(iii) [Reserved]

(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraph (f)(3)(i) of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;

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- (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - (C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - (D) The power is provided only to the facility itself or to support the local transmission and distribution system.
 - (E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
- (ii) [Reserved]

§60.4214 - What are my notification, **reporting, and recordkeeping requirements if I am an owner or operator of a stationary CI internal combustion engine?**

- (d)** If you own or operate an emergency stationary CI ICE with a maximum engine power more than 100 HP that operates for the purpose specified in § 60.4211(f)(3)(i), you must submit an annual report according to the requirements in paragraphs (d)(1) through (3) of this section.
- (1)** The report must contain the following information:
- (i) Company name and address where the engine is located.
 - (ii) Date of the report and beginning and ending dates of the reporting period.
 - (iii) Engine site rating and model year.
 - (iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
 - (v)-(vi) [Reserved]
 - (vii) Hours spent for operation for the purposes specified in § 60.4211(f)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in § 60.4211(f)(3)(i). The report must also identify the entity that

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dispatched the engine and the situation that necessitated the dispatch of the engine.

40 CFR 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

§63.6590 - What parts of my plant does this subpart cover?

“(c) Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

(1) A new or reconstructed stationary RICE located at an area source;”

- (2) ✓ Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (3) No. 5 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

The affected units are subject to COMAR 26.11.19.09D, which requires that the Permittee control emissions of volatile organic compounds (VOC) from cold degreasing operations by meeting the following requirements:

- (a) COMAR 26.11.19.09D(2)(b), which establishes that the Permittee shall not use any VOC degreasing material that exceeds a vapor pressure of 1 mm Hg at 20 ° C;
- (b) COMAR 26.11.19.09D(3)(a—d), which requires that the Permittee implement good operating practices designed to minimize spills and evaporation of VOC degreasing material. These practices, which shall be established in writing and displayed such that they are clearly visible to operators, shall include covers (including water covers), lids, or other methods of minimizing evaporative losses,

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and reducing the time and frequency during which parts are cleaned;

- (c) COMAR 26.11.19.09D(4), which prohibits the use of any halogenated VOC for cold degreasing.

The Permittee shall maintain on site for at least five (5) years, and shall make available to the Department upon request, the following records of operating data:

- (a) Monthly records of the total VOC degreasing materials used; and
- (b) Written descriptions of good operating practices designed to minimize spills and evaporation of VOC degreasing materials.
- (4) Containers, reservoirs, or tanks used exclusively for:
- (a) ✓ Storage of butane, propane, or liquefied petroleum, or natural gas;
- (b) No. 4 Storage of lubricating oils;
- (c) No. 2 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;
- (d) No. 1 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;
- (5) ✓ Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a total cooking area of 5 square feet (0.46 square meter) or less;
- (6) ✓ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;

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(7) ✓ Comfort air conditioning subject to requirements of
Title VI of the Clean Air Act;

(8) ✓ Laboratory fume hoods and vents;

For the following, attach additional pages as necessary:

(9) any other emissions unit, not listed in this section, with a potential to emit less than the "de minimus" levels listed in COMAR 26.11.02.10X (list and describe units):

No. 2 Aerosol can puncture equipment. _____

No. 1 Maintenance welding (U11-3) _____

No. 1 Maintenance steel cutting (U11-4) _____

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SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:

(A) **COMAR 26.11.06.08 - Nuisance**.

"An installation or premises may not be operated or maintained in such a manner that a nuisance or air pollution is created. Nothing in this regulation relating to the control of emissions may in any manner be construed as authorizing or permitting the creation of, or maintenance of, nuisance or air pollution."

(B) **COMAR 26.11.06.09 - Odors**.

"A person may not cause or permit the discharge into the atmosphere of gases, vapors, or odors beyond the property line in such a manner that a nuisance or air pollution is created."

(C) **COMAR 26.11.15.05, Control Technology Requirements**.

"A person who complies with the ambient impact requirement in Regulation .06 of this chapter may not be affected by the amount of the installation's stack height that exceeds good engineering practice (GEP), or by any other dispersion technique.

Unless an existing installation is controlled using T-BACT, the degree of emission limitation required in order to demonstrate compliance with Regulation .06 of this chapter may not be affected by the amount of the installation's stack height that exceeds good engineering practice (GEP), or by any other dispersion technique."

(D) **COMAR 26.11.15.06, Ambient Impact Requirement – Requirements for Existing Installations, Sources, or Premises**.

1) "Except as provided in §B(3) of this regulation, a person may not cause or permit the discharge of a toxic air pollutant listed in COMAR 26.11.16.07 from an existing installation or source if total allowable emissions of that TAP from the premises will unreasonably endanger human health.

2) A person shall demonstrate compliance with §B(1) of this regulation using the procedures established in Regulation .07 of this chapter and COMAR 26.11.16.

3) A person who owns or operates an existing premises shall meet the requirements of §B(1) and (2) of this regulation for each TAP listed in COMAR 26.11.16.07 by the applicable compliance dates listed in COMAR 26.11.16.07, or not later than 2 years after becoming subject to this chapter, whichever is later."

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2. Record Keeping and Reporting:

The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

- (a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or
- (b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.



American Sugar Refining, Inc.

1100 Key Highway East
Baltimore, MD 21230

October 27, 2022

Maryland Department of the Environment
Air and Radiation Administration
1800 Washington Boulevard
Baltimore, Maryland 21230
Attention: Suna Yi Sariscak, Air Quality Permits Program Manager

RE: Part 70 Permit Renewal Application – American Sugar Refining, Inc. (24-510-0314)

Dear Ms. Sariscak:

On behalf of American Sugar Refining, Inc. (ASR), I am pleased to enclose two (2) copies of the Part 70 Permit Renewal Application for the Baltimore Domino Sugar Refinery. One (1) soft copy was submitted via email (MDE.Submit-AirPermits@maryland.gov). This application contains “Off-Permit” changes occurring at the facility since the current Part 70 permit was issued on November 1, 2018.

Please do not hesitate to call me at (443) 651-0059 should you need additional information or have any questions. We thank you for your review of this information.

Sincerely,

A handwritten signature in black ink that reads 'J.P. Staryarsky'.

Joseph Staryarsky
EHS Manager

Attachments

Cc: Jan Walker, POWER Engineers



Maryland
Department of
the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

Air and Radiation Administration • Air Quality Permits Program • 1800 Washington Blvd, Ste.720 • Baltimore, MD 21230

Budget Reconciliation and Financing Act of 2003
(Commonly referred as Maryland House Bill 935)

On July 1, 2003, House Bill 935, Chapter 203 amended § 1-203 of the Environment Article, Annotated Code of Maryland, as follows:

Section 1-203(b).

- (1) A license or permit is considered renewed for purposes of this subsection if the license or permit is issued by a unit of State government to a person for the period immediately following a period for which the person previously possessed the same or a substantially similar license.
- (2) Before any license or permit may be renewed under this article, **the issuing authority shall verify through the office of the Comptroller (emphasis added)** that the applicant has paid all undisputed taxes and the unemployment insurance contributions payable to the Comptroller or the Secretary of Labor Licensing, and Regulation or that the applicant has provided for payment in a manner satisfactory to the unit responsible for collection.

In order for the Maryland Department of the Environment (MDE) to verify this compliance, we would need you to provide the following information before we can process or issue your renewal license, permit, or certification:

Current MDE License/Permit No: Part 70 Operating Permit 24-510-0314

Name of Licensee or Permit Holder: American Sugar Refining, Inc

Address: 1100 Key Highway East

Baltimore, MD 21230

Contact Name: Bruce Peters Title: Director, NA Manufacturing

Contact Telephone Number: 914-879-1029

Privacy Act Notice: This Notice is provided pursuant to the Federal Privacy Act of 1974, 5 U.S.C. § 552a. Disclosure of your Social Security or Federal Tax Identification on this form is mandatory pursuant to the provisions of § 1-203 (2003) of Environment Article, Annotated Code of Maryland, which requires MDE to verify that an applicant for a permit or license has paid all undisputed taxes and unemployment insurance. Social Security and Federal Tax Identification Nos. will not be used for any purposes other than those described in this Notice.

Federal Employer Identification Number (FEIN): 13-3366163

Certification: I certify that the above information is true and correct to the best of my knowledge.

Signature: Bruce E. Peters Date: 10/27/22

Complete and return this form to the above address. Call 410-537-3230 if you have questions.

October 27, 2022

AMERICAN SUGAR REFINING, INC.

Baltimore Refinery

Title V Air Quality Permit Renewal Application

PROJECT NUMBER:
178808

PROJECT CONTACT:
Jan Walker
EMAIL:
jan.walker@powereng.com
PHONE:
410-312-7906



Title V Air Quality Permit Renewal Application

PREPARED FOR: AMERICAN SUGAR REFINING, INC.

PREPARED BY: JAN WALKER

410-312-7906

JAN.WALKER@POWERENG.COM

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ACRONYMS AND ABBREVIATIONS

ASR	American Sugar Refining, Inc.
CEMS	Continuous Emissions Monitoring System
CFR	Code of Federal Regulations
COMAR	Code of Maryland Regulations
MDE	Maryland Department of the Environment
POWER	POWER Engineers, Inc.
SIC	Standard Industrial Classification Code
USEPA	United States Environmental Protection Agency

1.0 INTRODUCTION

1.1 BACKGROUND

American Sugar Refining, Inc. (ASR) operates a sugar manufacturing plant, which produces granulated and confectioner's sugars from raw cane sugar in bulk quantities and in various packaged sizes. The facility also manufactures bulk quantities of liquid cane sugars and syrups for industrial consumption. The sugar manufacturing process consists of two principle processes: decolorization and sugar production. The company also operates a centralized steam and electrical cogeneration energy production facility (power house).

The sugar manufacturing plant is located at 1100 Key Highway East in Baltimore, Maryland. The primary Standard Industrial Classification (SIC) Code for this plant is 2062 (sugar cane refining). On November 1, 2018, the Maryland Department of the Environment, Air and Radiation Administration (MDE) issued renewed Title V (Part 70) Operating Permit No. 24-510-0314 to ASR for the facility.

2.0 PURPOSE

This document serves as the Part 70 Permit Application for Renewal of Permit No. 24-510-00314. The current Part 70 permit for the Facility is due to expire on October 31, 2023. Per Section II, Condition 5, this permit renewal is being submitted 12 months prior to that expiration date.

3.0 APPLICATION CONTENTS

The Part 70 Permit Application for Renewal is being provided to renew and amend, as necessary, the existing Refinery Title V permit. The Part 70 renewal forms are provided for all emission units at the facility including those units covered by Off-Permit changes occurring since the issuance of the current permit.

The following Off-Permit changes were made during this period and have been incorporated:

1. June 19, 2020 (510-0314-8-0409) – Bulk Powdered Sugar Tote Packaging Line (S6-7J)
2. February 25, 2021 (510-0314-8-0410 and -8-0411) - Four new sugar storage silos (S1-S4) and associated equipment (BV-1 – BV-4; BE-1, AC-2A, AC-2B, AC-9) controlled by a Schenck dust collector (DV-1). This project is not yet complete but is expected to be completed before the expiration date of the current Title V permit.
3. April 9, 2021 (510-0314-8-0225 and -8-0296) – Modification to the existing 10X Filler System (S6-7I)
4. August 5, 2021 (510-0314-6-3091) – Old Sugar Shed Conveyance system to/from Storage Barge

The streamlining methodologies of the United States Environmental Protection Agency (USEPA) White Papers: *White Paper for Streamlined Development of Part 70 Permit Applications*, issued July 10, 1995 and *White Paper No. 2 for Improved Implementation of the Part 70 Operating Permits Program*, issued March 5, 1996 have been incorporated as appropriate.

A few control device references were incorrectly identified in the 2018 permit. The following changes reflect the proper equipment:

- Scrap Melter 1 (S5-1) is controlled by a Rotoclone (RP-C-1), not RP-C-10 as indicated in the current permit;

- Packaging system (S7-10) is controlled by a Wheelabrator dust collector (7-5-1) (RP-C-**32**), not RP-C-30 as indicated in the current permit; and
- The “Super-Sack” Packaging Line (S7-11) is controlled by a Wheelabrator dust collector (7-5-**2**) (RP-C-30), not 7-5-1 as indicated in the current permit.

Also, other changes were made with administrative amendments:

- Replacement of 100 kW emergency generator with a 250 kW emergency generator. ASR requests that MDE update the size reference for U11-2. Administrative completeness was issued April 23, 2020; and
- Removal of sources due to the fire in 2021 at the Raw Sugar Shed. The following equipment was destroyed and is no longer in operation: Raw Sugar Shed (R29-2), Conveyors RSB-6 and RSB-9, and Shuttle RSS-3. Administrative completeness was issued April 30, 2021.

MDE Application Forms

VI . Application Completeness Checklist

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RENEWAL TITLE V APPLICATION CHECKLIST**

VI . Application Completeness Checklist

The purpose of this part is to list the information required to achieve a Part 70 application shield.

Cover Page

- (x) Name and address of owner or operator, including telephone number.
- (x) Name and address of facility, including the plant manager's name and telephone number.
- (x) A 24-hour emergency telephone number for air pollution matters.

Section 1 CERTIFICATION STATEMENTS

- (x) The certification statement completed and signed by a responsible official.

Section 2 FACILITY DESCRIPTION SUMMARY

- (x) A brief description of each of the source's process(es), including all applicable SIC codes and end products.
- (x) Flow diagrams indicating all emissions units, emission points, and control devices.
- (x) A plot plan of the entire facility.
- (x) Emission Certification Report.
- (x) General Emissions Information.

Section 3 EMISSIONS UNIT DESCRIPTIONS

This section must be completed for each emissions unit.

Part A

- (x) Emissions unit number.
- (x) Detailed description of unit, including all emission points.
- (x) Federally enforceable limit(s) on the operating schedule.

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
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RENEWAL TITLE V APPLICATION CHECKLIST**

- (x) Fuel consumption information for any emissions unit that consumes fuel including the type of fuel, percent sulfur, and annual usage of fuel.

Part B

- (x) A citation and description of each federally enforceable requirement, including all emission standards, for each emissions unit.
- (x) A statement of compliance demonstration techniques for each requirement, including a description of monitoring, record keeping, reporting requirements, and test methods.
- (x) The frequency of submittal of the compliance demonstration during the permit term.

Part C

- (x) Emissions unit number.
- (x) Permit to construct number.
- (x) Emissions point number(s).
- (x) Date(s) the permit to construct was issued.
- (x) Condition number(s) as indicated on the permit to construct.
- (x) Description of the permit condition(s) and the reason(s) why they are believed to be obsolete, extraneous, or insignificant.

Part D

- (N/A) Description of all alternate operating scenarios that apply to an emissions unit.
- (N/A) Number assigned to each scenario.
- (N/A) Emissions unit number.

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
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- (N/A) Description of the operating parameters for the emissions unit and other information which describes the how the operation of the unit will change under the different scenario.

Part E

- (N/A) A citation and description of each federally enforceable requirement triggered by an operating scenario, including all emission standards, for each emissions unit.
- (N/A) As an attachment, the date and results of the most recent compliance demonstration for each emission standard and/or emissions certification report with relevant supporting documentation.
- (N/A) A statement of compliance demonstration techniques for each requirement, including a description of monitoring, record keeping, reporting requirements, and test methods.
- (N/A) The frequency of submittal of the compliance demonstration during the permit term.

Section 4 CONTROL EQUIPMENT

- (x) The type of each piece of air pollution control equipment.
- (x) The capture and control efficiencies of the control equipment.

Section 5 SUMMARY SHEET OF POTENTIAL EMISSIONS

- (N/A) Quantity of potential emissions for criteria pollutants and HAPs emitted in tons per year for each emissions unit.
- (N/A) Fugitive emission estimations for the entire facility for criteria pollutants and HAPs emitted in tons per year.
- (N/A) Basis for all emission calculations.

**Section 6 AN EXPLANATION OF PROPOSED EXEMPTIONS FROM
OTHERWISE APPLICABLE FEDERALLY ENFORCEABLE
REQUIREMENTS**

- (x) An explanation of the proposed exemption.

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RENEWAL TITLE V APPLICATION CHECKLIST**

**Section 7 COMPLIANCE SCHEDULE FOR NONCOMPLYING
EMISSIONS UNITS**

- (N/A) Identification of emissions unit(s) not in compliance, including the requirement being violated and the effective compliance date.
- (N/A) Detailed description of methods to be used to achieve compliance.
- (N/A) A schedule of remedial measures, including an enforceable sequence of actions with milestones.

Attachment

- (x) Checklist of Insignificant Activities
- (N/A) CAM Plan (If Applicable)

PART 70 PERMIT APPLICATION FOR RENEWAL

PART 70 PERMIT APPLICATION FOR RENEWAL
AIR AND RADIATION MANAGEMENT ADMINISTRATION

Facilities required to obtain a Part 70 permit under COMAR 26.11.03.01 must complete and return this form. Applications are incomplete unless all applicable information required by COMAR 26.11.03.03 and 26.11.03.13 is supplied. Failure to supply additional information required by the Department to enable it to act on the application may result in loss of the application shield and denial of this application.

Owner and Operator:

Name of Owner or Operator: American Sugar Refining, Inc.		
Street Address: 1 Federal Street		
City: Yonkers	State: NY	Zip Code: 10705
Telephone Number (914) 963-2400		Fax Number (917) 709-8335

Facility Information:

Name of Facility: American Sugar Refining, Inc.		
Street Address: 1100 Key Highway East		
City: Baltimore	State: MD	Zip Code: 21230
Plant Manager: George Carter	Telephone Number: (416) 301-7619	Fax Number:
24-Hour Emergency Telephone Number for Air Pollution Matters: (410) 752-6150		

List, on a separate page, the names and telephone numbers of other facility owners and persons with titles.

MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard • Baltimore MD 21230
(410) - 537-3000 • 1-800-633-6101 • <http://www.mde.state.md.us>

Additional Contact:

Joseph P. Staryarsky, EHS Manager
443-651-0059

SECTION 1 CERTIFICATION STATEMENTS

SECTION 1. CERTIFICATION STATEMENTS

1. Compliance Status with Applicable Enhanced Monitoring and Compliance Certification Requirements

The emissions units identified in this application are in compliance with applicable enhanced monitoring and compliance certification requirements.

2. Certification of Current Compliance with All Applicable Federally Enforceable Requirements

Except for the requirements identified in Section 7 of this application, for which compliance is not achieved, I hereby certify, based on information and belief formed after reasonable inquiry, that the facility is currently in compliance with all applicable federally enforceable requirements and agree that the facility will continue to comply with those requirements during the permit term.

You must complete a Section 7 form for each non-complying emissions unit.

3. Statement of Compliance with Respect to All New Applicable Requirements Effective During the Permit Term

I hereby state, based on information and belief formed after reasonable inquiry, that the facility agrees to meet, in a timely manner, all applicable federally enforceable requirements that become effective during the permit term, unless a more detailed schedule is expressly required by the applicable requirement.

4. Risk Management Plan Compliance

I hereby certify that, based on information and belief formed after reasonable inquiry, that a Risk Management Plan as required under ☐ 112(r) of the Clean Air Act:

☐ has been submitted;

☐ will be submitted at a future date; or

☒ does not need to be submitted.

5. Statement of Truth, Accuracy, and Completeness

"I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision and in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

RESPONSIBLE OFFICIAL:

X Bruce E. Peters

SIGNATURE

10/27/22

DATE

Bruce Peters
PRINTED NAME

Director, NA Manufacturing
TITLE

SECTION 2 FACILITY DESCRIPTION SUMMARY

SECTION 2. FACILITY DESCRIPTION SUMMARY

1. Major Activities of Facility

Briefly describe the major activities, including the applicable SIC Code(s) and end product(s).

American Sugar Refining, Inc. (ASR) operates a sugar manufacturing plant which produces granulated and confectioners sugars from raw cane sugar in bulk quantities and in various package sizes. The facility also manufactures bulk quantities of liquid cane sugars and syrups for industrial consumption. The sugar manufacturing process consists of two principal processes: decolorization and sugar production. The facility also operates a centralized steam and electrical cogeneration energy production facility (boiler house). There are four boilers (130 MMBtu/hr each) which fire natural gas and use #2 fuel oil in curtailment situations. There is also one boiler rated at 300 MMBtu/hr which fires natural gas only.

The sugar manufacturing facility is located at 1100 Key Highway East in Baltimore, Maryland. The primary SIC code for this plant is 2062 (sugar cane refining).

2. Facility-Wide Emissions

- A. This facility is required to obtain a Part 70 Operating Permit because it is:
Check appropriate box:

☒ Actual Major
☐ Potential Major
☐ Solid Waste Incineration Unit Requiring Permit Under § 129(e) of CAA

- B. List the actual facility-wide emissions below:
 (Actual data from 2021 Annual Emission Certification Report)

PM10 236.58 NOx 46.26 VOC 9.37 SOx 0.90 CO 76.17 HAPs 1.74

3. Include With the Application:

- a. See Attachment 1 for Flow Diagram/Plot Plan.
- b. See Attachment 2 for the 2021 Emissions Certification Report (most recent submitted to the Department.)

SECTION 3A EMISSIONS UNIT DESCRIPTIONS

SECTION 3A-1. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: C1, C2, C3, C4 1a. Date of installation (month/year): C1-C4: 1966; modified June 2012	2. MDE Registration No.:(if applicable) 5-1444 (C1) 5-1445 (C2) 5-1446 (C3) 5-1447 (C4)
3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s): <u>Combustion Units</u> <hr/> <u>Combustion Engineering boilers (130 MMBtu/hr) firing Natural Gas and #2 fuel oil</u> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>	
4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit: General Reference: _____ Continuous Processes: ___N/A___ hours/day ___N/A___ days/year Batch Processes: ___N/A___ hours/batch ___N/A___ batches/day ___N/A___ days/year	
5. Fuel Consumption: <div style="display: flex; justify-content: space-between;"> Type(s) of Fuel % Sulfur Annual Usage (specify units) </div> <div style="display: flex; justify-content: space-between;"> 1. <u>Natural Gas</u> <u>961.0 MMSCF</u> </div> <div style="display: flex; justify-content: space-between;"> 2. <u>No. 2 Fuel Oil</u> <u>21,730 gallons</u> </div> <div style="display: flex; justify-content: space-between;"> 3. _____ </div>	
6. Emissions in Tons: (NOTE: Actual data from 2021 Annual Emission Certification Report) A. Actual Major: _____ Potential Major:_____ (note: before control device) B. Actual Emissions: NOx <u>28.51</u> SOx <u>0.32</u> VOC <u>2.33</u> PM10 <u>3.24</u> HAPs <u>0.93</u>	

SECTION 3A-2. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: C6		2. MDE Registration No.:(if applicable) 5-1476 (C6)	
1a. Date of installation (month/year): July 2000; modified 2013 and 2018			
3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s): <u>Combustion Unit</u> <u>C6: Babcock & Wilcox boiler (300 MMBtu/hr) firing Natural Gas; equipped with a low-</u> <u>NOx burner and flue gas recirculation.</u>			
4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit: General Reference: _____ Continuous Processes: <u>N/A</u> hours/day <u>N/A</u> days/year Batch Processes: <u>N/A</u> hours/batch <u>N/A</u> batches/day <u>N/A</u> days/year			
5. Fuel Consumption:			
Type(s) of Fuel	% Sulfur	Annual Usage (specify units)	
1. <u>Natural Gas</u>		<u>823.28</u> <u>MMSCF</u>	
2. _____			
3. _____			
6. Emissions in Tons: (NOTE: Actual data from 2021 Annual Emission Certification Report)			
A. Actual Major: _____	Potential Major: _____	(note: before control device)	
B. Actual Emissions:	NOx <u>11.91</u>	SOx <u>0.22</u>	VOC <u>1.99</u> PM10 <u>2.75</u> HAPs <u>0.78</u>

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SECTION 3A-3. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: R29-1 1a. Date of installation (month/year): 1921; modified July 2021	2. MDE Registration No.:(if applicable) 6-2019
3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s): <hr/> <div style="text-align: center; padding: 5px;"> <u>Raw Sugar Unloading and Conveying</u> </div> <div style="text-align: center; padding: 5px;"> <u>July 2021 – additional equipment for transfer of raw sugar - Old Sugar Shed to/from barges</u> </div> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>	
4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit: General Reference: _____ Continuous Processes: <u> N/A </u> hours/day <u> N/A </u> days/year Batch Processes: <u> N/A </u> hours/batch <u> N/A </u> batches/day <u> N/A </u> days/year	
5. Fuel Consumption: N/A <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Type(s) of Fuel % Sulfur Annual Usage (specify units) </div> 1. _____ 2. _____ 3. _____	
6. Emissions in Tons: (NOTE: Actual data from 2021 Annual Emission Certification Report) A. Actual Major: _____ Potential Major: _____ (note: before control device) B. Actual Emissions: NOx _____ SOx _____ VOC _____ PM10 <u>5.38</u> HAPs _____	

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SECTION 3A-4. EMISSIONS UNIT DESCRIPTIONS

<p>1. Emissions Unit No.: R29-3, -4; S7B-2; S7-12, -13, 14</p> <p>1a. Date of installation (month/year): R29-2: 1968 R29-3, -4: 1971 S7B-2: 1966 S7-12: 1982 S7-13: 1989 S7-14: 1966</p>	<p>2. MDE Registration No.:(if applicable) 6-2019 (R29) 8-0212 (S7B-2) 8-0266 (S7-12) 8-0223 (S7-14)</p>																				
<p>3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):</p> <hr/> <p style="padding-left: 40px;">S29-3: Melter Feed</p> <hr/> <p style="padding-left: 40px;">S29-4: Diatomite Fugitives</p> <hr/> <p style="padding-left: 40px;">S7B-2: Bin Tower Rejects Box</p> <hr/> <p style="padding-left: 40px;">S7-12: Maltodex Supersack Unloading System</p> <hr/> <p style="padding-left: 40px;">S7-13: Remelt Shredder Fugitives</p> <hr/> <p style="padding-left: 40px;">S7-14: Magnets Tailings Fugitives</p> <hr/>																					
<p>4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:</p> <p>General Reference: _____</p> <p>Continuous Processes: <u> N/A </u> hours/day <u> N/A </u> days/year</p> <p>Batch Processes: <u> N/A </u> hours/batch <u> N/A </u> batches/day</p> <p style="padding-left: 150px;"><u> N/A </u> days/year</p>																					
<table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;">5. Fuel Consumption:</td> <td style="width:30%; text-align: center;">N/A</td> <td style="width:20%;"></td> <td style="width:20%;"></td> </tr> <tr> <td style="padding-left: 40px;">Type(s) of Fuel</td> <td style="text-align: center;">% Sulfur</td> <td></td> <td style="text-align: right;">Annual Usage (specify units)</td> </tr> <tr> <td>1. _____</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2. _____</td> <td></td> <td></td> <td></td> </tr> <tr> <td>3. _____</td> <td></td> <td></td> <td></td> </tr> </table>		5. Fuel Consumption:	N/A			Type(s) of Fuel	% Sulfur		Annual Usage (specify units)	1. _____				2. _____				3. _____			
5. Fuel Consumption:	N/A																				
Type(s) of Fuel	% Sulfur		Annual Usage (specify units)																		
1. _____																					
2. _____																					
3. _____																					
<p>6. Emissions in Tons: (NOTE: Actual data from 2021 Annual Emission Certification Report)</p> <p>A. Actual Major: _____ Potential Major: _____ (note: before control device)</p> <p>B. Actual Emissions: NOx _____ SOx _____ VOC _____ PM10 <u>2.42</u> HAPs _____</p>																					

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SECTION 3A-5. EMISSIONS UNIT DESCRIPTIONS

<p>1. Emissions Unit No.: D28-1, D10-1, D10-2, D10-3,</p> <p>1a. Date of installation (month/year): D28-1, D10-1, 2, 3 (1995);</p>	<p>2. MDE Registration No.:(if applicable) 8-0301</p>												
<p>3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):</p> <p><u>Carbonation System:</u></p> <p>D28-1: Carbonatation Process- Lime silo equipped with a baghouse</p> <p>D10-1, 2, 3: Carbonatation Process- saturators equipped demisters (RP-C-1, -2, -3, respectively) and controlled by a Ducon Flue Gas Scrubber</p>													
<p>4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:</p> <p>General Reference: _____</p> <p>Continuous Processes: <u> N/A </u> hours/day <u> N/A </u> days/year</p> <p>Batch Processes: <u> N/A </u> hours/batch <u> N/A </u> batches/day</p> <p> <u> N/A </u> days/year</p>													
<p>5. Fuel Consumption: N/A</p> <table style="width:100%; border: none;"> <tr> <td style="width:35%;">Type(s) of Fuel</td> <td style="width:35%;">% Sulfur</td> <td style="width:30%;">Annual Usage (specify units)</td> </tr> <tr> <td>1. _____</td> <td></td> <td></td> </tr> <tr> <td>2. _____</td> <td></td> <td></td> </tr> <tr> <td>3. _____</td> <td></td> <td></td> </tr> </table>		Type(s) of Fuel	% Sulfur	Annual Usage (specify units)	1. _____			2. _____			3. _____		
Type(s) of Fuel	% Sulfur	Annual Usage (specify units)											
1. _____													
2. _____													
3. _____													
<p>6. Emissions in Tons: (NOTE: Actual data from 2021 Annual Emission Certification Report)</p> <p>A. Actual Major: _____ Potential Major: _____ (note: before control device)</p> <p>B. Actual Emissions: NOx <u> 0.40 </u> SOx <u> 0.005 </u> VOC <u> 0.59 </u> PM10 <u> 0.0 </u> HAPs <u> 0.01 </u></p>													

MARYLAND DEPARTMENT OF THE ENVIRONMENT

SECTION 3A-6. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: D2-1; U5-1 1a. Date of installation (month/year): D2-1: 1964 U5-1: unknown	2. MDE Registration No.:(if applicable) 8-0301 (D2-1) 8-0383 (U5-1)
3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s): <hr/> <div style="padding-left: 40px;">D2-1: Mud Loading</div> <hr/> <div style="padding-left: 40px;">D3-5: Char Filtration Process – Celite Fugitives</div> <hr/> <div style="padding-left: 40px;">U5-1: Cooling Tower CT-3</div> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>	
4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit: General Reference: _____ Continuous Processes: _____ <u>N/A</u> _____ hours/day _____ <u>N/A</u> _____ days/year Batch Processes: _____ <u>N/A</u> _____ hours/batch _____ <u>N/A</u> _____ batches/day _____ <u>N/A</u> _____ days/year	
5. Fuel Consumption: N/A <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Type(s) of Fuel % Sulfur Annual Usage (specify units) </div> 1. _____ 2. _____ 3. _____	
6. Emissions in Tons: (NOTE: Actual data from 2021 Annual Emission Certification Report) A. Actual Major: _____ Potential Major: _____ (note: before control device) B. Actual Emissions: NOx _____ SOx _____ VOC _____ PM10 <u>0.09</u> HAPs _____	

SECTION 3A-7. EMISSIONS UNIT DESCRIPTIONS

<p>1. Emissions Unit No.: S5-1; S5-2, S5-3, S5-4, S5-5, S5-6, S5-8A, S5-8B, S5-8C, S5-8D, S5-8E, S5-8F, S5-8G, S1-1, S7A-1, S7-5, S7-6, S7-7, S7-8A, S7-8B, S7-8C, S7-8D, S7-10A, S7-10B, S7B-1, S7-11A, S7-11B, S7-11C</p> <p>1a. Date of installation (month/year): S5-1: 1922 S5-2, -3: 1991 S5-5: 1958 S5-6: 1969 S5-8A, -8B, -8D, -8E, -8F, -8G: Feb 2004 S1-1: 1999 S7A-1, S7B-1: 1966 S7-5, S7-6, S7-7, S7-8, S7-10: Jan 2001 S7-11: 1990</p>	<p>2. MDE Registration No.:(if applicable)</p> <p>8-0226 (S5-1) 8-0382 (S5-2, -3) 6-2022 (S5-4, S5-5) 6-2020 (S5-6) 8-0332 (S5-8A-G) 8-0320 (S1-1) 8-0212 (S7A-1) 8-0265 (S7-5, S7-6, S7-7, S7-8, S7-10) 8-0223 (S7B-1) 8-0287 (S7-11)</p>
<p>3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):</p> <p>S5-1: Scrap melter equipped with a Rotoclone scrubber</p> <hr/> <p>S5-2: Scrap melter</p> <hr/> <p>S5-3: Remelt Screw Conveyors</p> <hr/> <p>S5-4: Invert System with a Rotoclone [S5-4A: Invert Cloudy Tank; S5-4B: Invert Precoat Tank; S5-4C: Sucrose Cloudy Tank; S5-4D: Sucrose Precoat Tank; S5-4E: Clear Sucrose Tank; S5-4F: Clear Invert Tank]</p> <hr/> <p>S5-5: Caustic fugitives associated with the Invert System</p> <hr/> <p>S5-6: Soft Sugar</p> <hr/> <p>S5-8A-C: Two (2) Dryers (Powdered Specialty Sugars) each equipped with venturi scrubbers (DW-1) (RP-C-33), DW-2 (RP-C-34), respectively</p> <hr/> <p>S5-8D: Liquid Sugar Cooler (Powdered Specialty Sugars) controlled by Sly Venturi Scrubber (WS-1) (RP-C-35)</p> <hr/> <p>S5-8E: Three Centrifugal Separators controlled by Sly Venturi Scrubber (WS-1) (RP-C-36)</p> <hr/> <p>S5-8F: Washout Tanks and Beater controlled by a Rotoclone</p> <hr/> <p>S5-8G: Packaging and Conveying Equipment controlled by Sly Venturi Scrubber (WS-1) (RP-C-36)</p> <hr/> <p>S1-1: FEECO Rotary sugar dryer equipped with Entoleter vortex scrubber (RP-C-15)</p> <hr/> <p>S7A-1: Bulk Sugar Conveying System controlled by a scrubber (RP-C-25)</p> <hr/> <p>[S7A-RE1: Bucket Elevator RE-1; S7A-XE1: Bucket Elevator XE-1; S7A-XRS1: Bucket Elevator XRS-1; S7A-UE1: Bucket Elevator UE-1; S7A-UE2A: Bucket Elevator UE-2A; S7A-UE2B: Bucket Elevator UE-2B; S7A-RE2: Bucket Elevator RE-2; SA7-U1: Storage Bin U1;</p>	

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SA7-U2: Storage Bin U2; SA7-U3: Storage Bin U3; SA7-U4: Storage Bin U4; SA7-U5: Storage Bin U5; SA7-U6: Storage Bin U6; SA7-XF1: Storage Bin XF-1; SA7-XF2: Storage Bin XF-2; SA7-V1: Storage Bin V1; SA7-V2 Storage Bin V2; SA7-V3: Storage Bin V3; SA7-V4: Storage Bin V4; SA7-V5: Storage Bin V5; SA7-V6: Storage Bin V6; SA7-C1: Storage Bin C1; SA7-F1: Storage Bin F1; SA7-AR1: Storage Bin AR1; SA7-AR2: Storage Bin AR2; SA7-AR3: Storage Bin AR3; SA7-AR4: Storage Bin AR4; SA7-AR5: Storage Bin AR5; SA7-AR6: Storage Bin AR6; SA7-AR7: Storage Bin AR7; SA7-AR8: Storage Bin AR8; SA7-RJX: Screw Conveyor Rejects			
S7-5, S7-6, S7-7: Packaging Feed Tanks each equipped with a filter (RP-C-26, -27, and -28, respectively)			
S7-8: Packaging Operations controlled by Rotoclone 7-6-1 (RP-C-29)			
[S7-8A: Fawema Packaging System; S7-8B: Paxall Packaging System; S7-8C: Clouds Packaging System; S7-8D: Handi Pak System]			
S7-10: Packaging System controlled by a Wheelabrator dust collector (7-5-1) (RP-C-32)			
[S7-10A: Hesser Bagging System; S7-10B: Supersack Unloading System]			
S7B-1: Bulk Loading System with an Entoleter scrubber (RP-C-31) and DCL UN800 Dust Collectors			
S7-11: Super-Sack Sugar Packing Line controlled by Wheelabrator dust collectors			
S7-11A: Thiele Supersack System; S7-11B: Tub Packaging Line controlled by Wheelabrator 7-5-2 (RP-C-30); S7-11C: Simplex Packaging Line controlled by a Wheelabrator dust collector 6-5-1 (RP-C-12)			
4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:			
General Reference: _____			
Continuous Processes:	____ N/A ____	hours/day	____ N/A ____
Batch Processes:	____ N/A ____	hours/batch	____ N/A ____
	____ N/A ____	days/year	
5. Fuel Consumption: N/A			
Type(s) of Fuel	%	Sulfur	Annual Usage (specify units)
1. _____			
2. _____			
3. _____			
6. Emissions in Tons: (NOTE: Actual data from 2021 Annual Emission Certification Report)			
A.	Actual Major: _____	Potential Major: _____	(note: before control device)
B.	Actual Emissions:	NOx _____ SOx _____ VOC _____ PM10 <u>9.29</u> HAPs _____	

SECTION 3A-8. EMISSIONS UNIT DESCRIPTIONS

Form Number: MDE/ARMA/PER.020
Revision Date 4/29/03
TTY Users 1-800-735-2258

SECTION 3A-9. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: S6-1, S6-1A, S6-2, S6-2A, S6-3, S6-3A, S6-8, S6-9 1a. Date of installation (month/year): S6-1, S6-1A, S6-2, S6-2A, S6-3, S6-3A, S6-9: 11/2008 S6-8: 1988		2. MDE Registration No.:(if applicable) 8-0209 (S6-1, -1A, -2, -2A, -9); 8-0125 (S6-3, -3A) 8-0266 (S6-8)	
3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s): <u>S6-1: Sugar Mill 1 equipped with MAC dry filter (RP-C-16)</u> <u>S6-1A: Starch Receiver 1 equipped with dry filter (RP-C-17)</u> <u>S6-2: Sugar Mill 2 equipped with MAC dry filter (RP-C-18)</u> <u>S6-2A: Starch Receiver 2 equipped with dry filter (RP-C-19)</u> <u>S6-3: Sugar Mill 3 equipped with MAC dry filter (RP-C-20)</u> <u>S6-3A: Starch Receiver 3 equipped with dry filter (RP-C-21)</u> <u>S6-8: Sugar Pulverizer (Mill 7) equipped with Mikropul baghouse (RP-C-24)</u> <u>S6-9: Starch Bin equipped with vent filter (RP-C-22)</u>			
4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit: General Reference: _____ Continuous Processes: _____ N/A _____ hours/day _____ N/A _____ days/year Batch Processes: _____ N/A _____ hours/batch _____ N/A _____ batches/day _____ N/A _____ days/year			
5. Fuel Consumption: N/A <div style="display: flex; justify-content: space-between;"> Type(s) of Fuel % Sulfur Annual Usage (specify units) </div> 1. _____ 2. _____ 3. _____			
6. Emissions in Tons: (NOTE: Actual data from 2021 Annual Emission Certification Report) A. Actual Major: _____ Potential Major: _____ (note: before control device) B. Actual Emissions: NOx _____ SOx _____ VOC _____ PM10 <u>1.25</u> HAPs _____			

SECTION 3A-10. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: S5-7, S7-15, S7-16 1a. Date of installation (month/year): 1950 (S5-7) 1990 (S7-15, S7-16)	2. MDE Registration No.:(if applicable) 6-2021 (S5-7) 6-2018 (S7-15) 9-1298 (S7-16)
3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s): <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">S5-7: Ten (10) Evaporation Pans (#1-9, 11)</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">S7-15: Packaging Video Inkjet Printers</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">S7-16: Packaging Adhesives fugitives</div> <div style="border: 1px solid black; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; height: 15px; margin-bottom: 2px;"></div> <div style="border: 1px solid black; height: 15px; margin-bottom: 2px;"></div>	
4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit: General Reference: _____ Continuous Processes: _____ <u>N/A</u> _____ hours/day _____ <u>N/A</u> _____ days/year Batch Processes: _____ <u>N/A</u> _____ hours/batch _____ <u>N/A</u> _____ batches/day _____ <u>N/A</u> _____ days/year	
5. Fuel Consumption: N/A <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Type(s) of Fuel % Sulfur Annual Usage (specify units) </div> <div style="margin-top: 5px;"> 1. _____ 2. _____ 3. _____ </div>	
6. Emissions in Tons: (NOTE: Actual data from 2021 Annual Emission Certification Report) <div style="margin-top: 5px;"> A. Actual Major: _____ Potential Major: _____ (note: before control device) </div> <div style="margin-top: 5px;"> B. Actual Emissions: NOx _____ SOx _____ VOC <u>2.46</u> PM10 _____ HAPs _____ </div>	

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SECTION 3A-11. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: D3-6, -7, -8, -9, -10, -11 1a. Date of installation (month/year): 2013	2. MDE Registration No.:(if applicable) 8-0386
3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):	
<div style="border-bottom: 1px solid black; margin-bottom: 5px;">Ion Exchange System:</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">D3-6: Scrubber (25 gpm once-through)</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">D3-6A: HCl Tank (8,450 gallons) equipped with scrubber D3-6</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">D3-7: Resin Acid Wash Tank (12,924 gallons)</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">D3-8: Clean in Place (CIP) Tank (734 gallons)</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">D3-9A, B, C, D: Four (4) Deashing Resin Beds (10,574 gallons each)</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">D3-10A, B, C, D: Four (4) Decolorized Resin Beds (23,603 gallons each)</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">D3-11A, B: Two (2) Salt saturators controlled by water spray chamber (D3-11)</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">D3-12: HCl equipment leak components (valves, pumps, connectors)</div>	
4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit: General Reference: _____ Continuous Processes: _____ <u>N/A</u> _____ hours/day _____ <u>N/A</u> _____ days/year Batch Processes: _____ <u>N/A</u> _____ hours/batch _____ <u>N/A</u> _____ batches/day _____ <u>N/A</u> _____ days/year	
5. Fuel Consumption: N/A <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Type(s) of Fuel % Sulfur Annual Usage (specify units) </div> <div style="margin-top: 5px;"> 1. _____ 2. _____ 3. _____ </div>	
6. Emissions in Tons: (NOTE: Actual data from 2021 Annual Emission Certification Report) <div style="margin-top: 5px;"> A. Actual Major: _____ Potential Major: _____ (note: before control device) </div> <div style="margin-top: 5px;"> B. Actual Emissions: NOx _____ SOx _____ VOC _____ PM10 <u>0.0003</u> HAPs _____ </div>	

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SECTION 3A-12. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: U11-2 1a. Date of installation (month/year): 2020	2. MDE Registration No.:(if applicable) 9-1293
3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s): <hr/> <div style="text-align: center;">U11-2: 250 kW Emergency Generator</div> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>	
4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit: General Reference: _____ Continuous Processes: <u> N/A </u> hours/day <u> N/A </u> days/year Batch Processes: <u> N/A </u> hours/batch <u> N/A </u> batches/day <u> N/A </u> days/year	
5. Fuel Consumption: N/A <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Type(s) of Fuel % Sulfur Annual Usage (specify units) </div> 1. _____ 2. _____ 3. _____	
6. Emissions in Tons: (NOTE: Actual data from 2021 Annual Emission Certification Report) A. Actual Major: _____ Potential Major: _____ (note: before control device) B. Actual Emissions: NOx <u> 5.44 </u> SOx <u> 0.36 </u> VOC <u> 0.43 </u> PM10 <u> 0.38 </u> HAPs <u> 0.09 </u>	

SECTION 3A-13. EMISSIONS UNIT DESCRIPTIONS

Form Number: MDE/ARMA/PER.020
Revision Date 4/29/03
TTY Users 1-800-735-2258

**SECTION 3B CITATION TO AND DESCRIPTION OF APPLICABLE
FEDERALLY ENFORCEABLE REQUIREMENTS**

SECTION 3B-1. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: C1, C2, C3, C4 **General Reference:** COMAR 26.11.09.05A(2), .06B, .07A(2)(c), .08C(2)(h), Permit 24-510-0314 Section IV, Condition 1.1

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Visible Emissions - COMAR 26.11.09.05A(2) states that in Areas III and IV, “a person may not cause or permit the discharge of emissions from fuel burning equipment, other than water in an uncombined form, which is visible to a human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.” Exceptions: COMAR 26.11.09.05A(1) and (2) do not apply to emissions during load changing, soot blowing, start-up, or occasional cleaning of control equipment if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.

B. Particulate Matter Emissions

(1) **COMAR 26.11.09.06B(1)(a)** prohibits the use of residual fuel oil in any fuel burning equipment unless the equipment is fitted with a dust collector designed to produce sufficient dust particle force, residence time and particle retention to meet the emission standards for dust collector performance standards. This does not apply to fuel burning equipment where by-product gases or by-product gases in combination with residual fuel oil are burned and where the effluent gases do not contain particulate matter in excess of the emissions standards and dust collector performance standards.

(2) **COMAR 26.11.09.06B(2)** – particulate matter caused by the combustion of residual oil not in excess of the emission standards.

(3) COMAR 26.11.09.09 – Emission Standards and Dust Collector Performance Standards for Fuel-Burning Equipment

Equipment Description	Max Rated Heat Input in Million Btu (gigajoules) per hour per furnace	Max Allowable Emissions of Particulate Matter in gr/scfd (mg/dscm)
Existing and new equipment burning residual oil	Less than 13 (13.7) 13-50 (13.7 – 52.8) 40-250 (52.8 – 265)	No requirement (a) 0.03 (69) 0.020 (46)

(4) **November 8, 2005 letter and MDE PTC 510-5-1444 – 5-1447 (August 28, 2014)** - may not burn any residual fuel oil with ash content in excess of 0.068%.

C. Sulfur Oxide Emissions

(1) **COMAR 26.11.09.07A(2)(c)** – may not burn, sell, or make available for sale any distillate fuel oils with sulfur content by weight in excess of 0.3% or residual fuel oil with a sulfur content by weight in excess of 1.0%.

(2) **November 8, 2005 letter** - may not burn any residual fuel oil with sulfur content in excess of 0.5%.

D. Nitrogen Oxide Emissions

(1) **COMAR 26.11.09.08B(1)(c)** – Emission standards in pounds of NOx per Million Btu of heat input:

Fuel	Tangential-Fired	Wall-Fired
Gas only	0.20	0.20
Gas/Oil	0.25	0.25
Coal (dry bottom)	0.38	0.38
Coal (wet bottom)	1.00	1.00

(2) **COMAR 26.11.09.08B(5)** – Operating Training

- (a) “For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.
- (b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department.”

(3) **COMAR 26.11.09.08D(1)(b)** – “All fuel burning equipment with a rated heat input capacity of less than 250 Million Btu per hour and greater than 100 Million Btu per hour shall meet the NOx emission rates set forth in B(1)(c).”

(4) **November 8, 2005 letter** - may not burn any residual fuel oil with nitrogen content in excess of 0.5%.

E. Operating Requirements

- (1) **Consent Decree JKB-12-1408, Section V(12) and MDE PTCs 510-5-1444 – 5-1447 (August 28, 2014)** - Combined hours of operation for Boilers 1 –4 shall not exceed 20,220 hours in any consecutive 12-month period.
- (2) **COMAR 26.11.09.06B(2) and MDE PTCs 510-5-1444 – 5-1447 (August 28, 2014)** – Particulate Matter emissions from Boilers 1-4 shall not exceed 0.020 grains per SCFD corrected to 50% excess oxygen.
- (3) **MDE PTCs 510-5-1444 – 5-1447 (August 28, 2014)** – In order to meet the 0.020 gr/scfd (corrected to 50% O₂):
 - a. Use only fuel oil (No. 2 or No. 6) with an ash content weight percent that will not cause total particulate matter emissions from the stack to exceed 0.020 gr/scfd, corrected to 50% excess oxygen;
 - b. Use Natural Gas and fuel oil (No. 2 or No. 6) in separate operating boilers that will not cause total particulate matter emissions from the stack to exceed 0.020 gr/scfd, corrected to 50% excess oxygen;
 - c. Install a dust collector device designed to meet the 0.020 gr/scfd per COMAR 26.11.0906B(1)(a).
- (4) **Consent Decree JKB-12-1408, Section V(11)(a) and V(10)(d), and MDE PTC 510-5-1476 (August 28, 2014), Modified Consent Decree (August 5, 2013) and EPA letter (April 2, 2014)** – ultra low NO_x burners on Boilers 1-4 and low NO_x burner on Boiler 6 to meet emission rate of 500 lbs/day (or 624 lb/day when appropriate) on a 30-day rolling average.
- (5) **Consent Decree JKB-12-1408, Section V(11)(a) and V(10)(d), and MDE PTC 510-5-1476 (August 28, 2014), Modified Consent Decree (August 5, 2013) and EPA letter (April 2, 2014)** – The primary combined NO_x emissions limit that applies to the operation of Boilers 1-4 and 6 is 500 lb/day, calculated on a 30-day rolling average as described in the Modified Consent Decree. Exception for the limit of 624 lbs/day are:
 - a. Any day in which:
 - i. Boiler 6 operates at any point in time;
 - ii. Boiler 6 operates in conjunction with any of the CE boilers, or;
 - iii. Boiler 6 does not operate and only three (3) of the CE boilers operate would count toward the 500 lb/day 30-day rolling average.
 - b. If there are seven (7) calendar days within a 30 day period in which Boiler 6 does not operate and each of the four CE boilers operates for some period of time in that calendar day, then the combined NO_x emission limit is 624 lbs/day. The seven days do not need to be consecutive.
 - c. ASR will calculate the 30-day rolling average each day. If all four CE boilers operated for six days or less within the previous 30 calendar day period, the limit of 500 lbs/day applies. If all four CE boilers operated seven days or more during the previous 30 calendar day period, the limit of 624 lbs/day applies.
- (6) **Consent Decree JKB-12-1408, Section V(11)(b) and MDE PTC 510-5-1444 – 5-1447 (August 28, 2014)** – Continuously operate the NO_x control technology at all times of boiler operation.
- (7) **Consent Decree JKB-12-1408, Section V(13), and MDE PTC 510-5-1444 – 5-1447 (August 28, 2014), Modified Consent Decree(August 5, 2013) and EPA letter (April 2, 2014)** – The total combined NO_x emissions from Boilers 1-4 and 6 in any consecutive 12 month period shall not exceed 60 tons.
- (8) **Consent Decree JKB-12-1408, Section V(14) and MDE PTC 510-5-1444 – 5-1447 (August 28, 2014)** – The total combined NO_x emissions from Boilers 1-4 and 6 in any calendar month shall not exceed 6.0 tons.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- [] Quarterly Monitoring Report: _____
- [X] Annual Compliance Certification: _____
- [X] Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference: COMAR 26.11.01.11B(4), 26.11.01.11C, 26.11.03.06C;
26.11.09.08C(2)(h); MDE letter dated November 8, 2005; Consent Decree JKB-12-1408,
Section V(15), (16), and (18); MDE PTCs 510-5-1444 – 5-1447 (August 28, 2014); Permit 24-510-
0314 Section IV, Condition 1.3

Describe:

A. Visible Emissions

The Permittee shall:

- (1) Properly operate and maintain the boiler in a manner to prevent visible emissions, and
- (2) Verify no visible emissions when burning fuel oil (No. 2 or No.6). The Permittee shall perform a visual observation for a 6-minute once for each 168-hour period when the boiler burns fuel oil. If a boiler does not burn fuel oil for more than 100 hours in a calendar year, the visible emissions observation requirement is waived for that boiler.
- (3) The Permittee shall perform the following, if visible emission are observed:
 - (a) Inspect combustion system and boiler operation;
 - (b) Perform all necessary adjustments and/or repairs to the boiler within 48 so that visible emissions are eliminated;
 - (c) Document in writing the results of inspections, adjustments, and/or repair to the boiler; and
 - (d) After 48 hours, if the required adjustments and/or repairs had not eliminated the visible emissions, perform a Method 9 observation for a 18-minute period once per day until corrective actions have eliminated the visible emissions.

B. Particulate Matter Emissions

The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the fuel oil (No 2. Or No. 6) has an ash content equal to or less than 0.068% by weight.

C. Sulfur Emissions

- (1) The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the No. 6 fuel oil has a sulfur content equal to or less than 0.5% by weight.
- (2) The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the No. 2 fuel oil has a sulfur content equal to or less than 0.3% by weight.

D. NOx Emissions

- (1) The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the oil has a nitrogen content equal to or less than 0.5% by weight.
- (2) At the point in each stack at which the boiler flue gas combines with flue gas from any other boiler, install and make operational, concurrent with commencement of operations of the ultra-low NOx burners, a NOx continuous emissions monitoring system (CEMS) to monitor NOx emissions in accordance with 40 Code of Federal Regulations (CFR) 60.
- (3) The required CEMS shall monitor and record the applicable NOx Emission Rate for each boiler to demonstrate compliance with the established NOx Emission Rates and shall be continuously operated, except during CEMS breakdowns, repairs, calibration checks, and zero span adjustments.
- (4) If the Permittee is unable to obtain emissions data from the CEMS because of a malfunction for the CEM for more than 2 hours in duration, the Permittee shall use the alternative measurement method approved by the Department and EPA.
- (5) A CEMS used to monitor a gas concentration shall record not less than four equally spaced data points per hour and automatically reduce data in terms of averaging times consistent with the applicable emission standard per COMAR 26.11.01.11D.
- (6) All emissions of NOx shall be measured by the CEMS. During any periods of time when any CEMS is inoperable or not measuring NOx emissions from any boiler, the Permittee shall apply the missing data substitution procedures provided in 40 CFR 75, Subpart D.
- (7) COMAR 26.11.01.11C – “A CEM used to monitor a gas concentration shall meet the quality assurance criteria of 40 CFR 60, Appendix F, as amended, which is incorporated by reference, or if applicable, the quality assurance criteria of 40 CFR 75, Appendix B, as amended.

Testing: Reference COMAR 26.11.03.06; Permit 24-510-0314 Cond IV.1.2

Describe:

A. Visible Emissions – COMAR 26.11.03.06C and MDE PTCs 510-5-1444 – 5-1447 (August 28, 2014) - Conduct Method 9, 22, or equivalent method approved by the Department opacity observations for at least one hour during stack testing to demonstrate compliance with the no visible emissions requirement of COMAR 26.11.09.05A(2) when burning fuel oil No. 2 or No. 6.

B. Particulate Matter Emissions

Stack emissions tests shall be conducted at least once every two-year period to demonstrate compliance with the 0.020 gr/scfd particulate matter emissions limit when the boiler burns No. 6 fuel oil with a pre-determined ash content weight percent. Stack emissions tests shall be conducted to demonstrate that compliance with the 0.020 gr/scfd particulate matter emissions limit can be achieved during either of the following operating conditions:

- (a) Burning only fuel oil (No. 2 or No. 6) with a pre-determined ash content weight percent in boilers #1 through #4; and burning the lowest possible ratio of natural gas to fuel oil (No. 2 or No. 6) in boilers #1 through #4.
- (b) Boilers #1 through #4 shall each be operated at 90% or higher of their rated capacity during all stack emissions tests.

Note: Stack testing on Boilers 1-4 not required when fuel oil (No. 2 or No. 6) has not been used at any time during the preceding two (2) years.

Record Keeping: Reference COMAR 26.11.03.06C; 26.11.09.08E; MDE letter dated November 8, 2005; MDE PTCs 510-5-1444 – 5-1447; Permit 24-510-0314 Cond IV.1.4

Describe:

A. Visible Emissions

- (1) Maintain an operational manual and preventive maintenance plan on site;
- (2) Maintain test result of Method 9 performed;
- (3) Maintain records of the results of monthly inspections;
- (4) Maintain record of the maintenance performed that relates to combustion performance;
- (5) Maintain a log of visible emissions observations performed and make them available to the Department upon request;
- (6) Maintain record of the hours that fuel oil (No. 2 or No. 6) is burned.

B. Particulate Matter Emissions

- (1) Maintain records of all stack emissions test documents;
- (2) Maintain fuel supplier certifications for each shipment of fuel oil (No. 2 or No. 6) stating the ash content in weight percent.

C. Sulfur Emissions

- (1) Maintain records of the annual fuel supplier stating that the No. 6 fuel oil used in Boilers 1 – 4 is in compliance with the 1.0% by weight sulfur limitation required by COMAR 26.11.09.07A(2)(c).
- (2) Per November 8, 2005 letter from MDE, sulfur content of fuel oil not to exceed 0.5%.
- (3) Maintain records of the annual fuel supplier stating that the No. 2 fuel oil used in Boilers 1 – 4 is in compliance with the 0.3% by weight sulfur limitation required by COMAR 26.11.09.07A(2)(b).
- (4) Maintain records of the certification from the supply company of all natural gas curtailment events, including date and duration of the event.

D. NOx Emissions

Maintain the following records and make available to the Department upon request:

- (1) Fuel supplier certification for each shipment of fuel oil (No. 2 or No. 6) stating the nitrogen content in weight percent.
- (2) All training and combustion analysis records required by COMAR 26.11.09.08B(5).

E. Operational Limitations

- (1) The Permittee shall maintain electronically for at least five (5) years, and shall make available to the Department upon request, records of the following information:
 - a. Monthly fuel oil (No. 2 or No. 6) usage in gallons per month and the total fuel usages for the previous rolling 12-month period.
 - b. To comply with the annual emissions cap – the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the total amount of NOx emissions for the current month and the previous eleven months.
 - c. To comply with the monthly emissions cap – the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the total amount of NOx emissions for each operating day during the month.
 - d. All stack emissions test documents.

- (2) To comply with the limit on combined total hours of operation for Boilers 1-4, the Permittee shall maintain electronically for at least five (5) years, and shall make available to the Department upon request, monitoring records of the hours of operation or each boiler.

Reporting: Reference COMAR 26.11.03.06C; MDE PTCs 510-5-1444 – 5-1447; Permit 24-510-0314 Cond IV.1.5

Describe:

A. Visible Emissions

Report in accordance with COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Management Administration.

B. Particulate Matter Emissions

- (1) At least 30 days prior to the projected date of the stack emissions test, the Permittee shall submit a test protocol to the Department for review and approval.
- (2) Within 45 days after the stack emissions test, the Permittee shall submit to the Department a stack test report that includes the stack emissions tests results and opacity observation results.

C. Sulfur Emissions

Make records of certification for the supplier available to the Department upon request.

D. NO_x Emissions

- (1) Submit a record of training program attendance for each operator to the Department upon request.
- (2) Comply with the CEMS System Downtime Reporting Requirements of COMAR 26.11.01.11E:
 - a. All CEM system downtime that lasts or is expected to last more than 24 hours shall be reported to the Department by telephone before 10 am of the first regular business day following the breakdown.
 - b. The system breakdown report shall include the reason, if known, for the breakdown and the estimated period of time that the CEM will be down. The owner or operator of the CEM shall notify the Department by telephone when an out-of-service CEM is back in operation and producing data that has met performance specification for accuracy, reliability, and durability of acceptable monitoring systems, as provided in COMAR 26.11.31, and is producing data.
- (3) Comply with the CEM Data Reporting Requirements of COMAR 26.11.01.11E:
 - a. All test results shall be reported in a format approved by the Department.
 - b. Certification testing shall be repeated when the Department determines that the CEM data may not meet performance specifications because of component replacement or other conditions that affect the quality of generated data.
 - c. A quarterly summary report shall be submitted to the Department not later than 30 days following each calendar quarter. The report shall be in a format approved by the Department, and shall include:
 - i. The cause, time periods, and magnitude of all emissions which exceed the applicable emission standards;
 - ii. The source downtime including the time and date of the beginning and end of each downtime period and whether the source downtime was planned or unplanned;
 - iii. The time periods and cause of all CEM downtime including records of any repairs, adjustments, or maintenance that may affect the ability of the CEM to meet performance specifications of emission data;
 - iv. Quarterly totals of excess emissions, installation downtime, and CEM downtime during the calendar quarter;
 - v. Quarterly quality assurance activities;
 - vi. Daily calibration activities that include reference values, actual values, absolute or percent of span differences, and drift status; and
 - vii. Other information required by the Department that is determined to be necessary to evaluate the data, to ensure that compliance is achieved, or to determine the applicability.
 - d. All information required to be reported to the Department shall be retained and made available for review by the Department for a minimum of 2 years from the time the report is submitted.
- (4) Report orally or by electronic or facsimile transmission to the EPA and MDE, no later than 24 hours after Permittee knew or should have known of any violation of the District Court Consent Decree, any permit regulations, or any event that may pose an immediate threat to the public health or welfare or the environment.

- (5) Submit within 30 days following each January 1st and July 1st a semi-annual report to the EPA for the immediately preceding half-calendar year period. The report shall:
- a. Identify any and all dates on which the Permittee has installed, or describe the progress of installation of, each Ultra-Low NOx burner required for NOx control, emission limits, CEMS, and monitoring requirements, and describe any problems encountered or anticipated during such installation, together with implemented or proposed solutions;
 - b. Provide all CEMS data collected for each Boiler 1-4 including an explanation of any periods of CEMS downtime together with any missing data for which American Sugar applied missing data substitution procedures, under Section VI.B of the Consent Order.
 - c. Demonstrate compliance with all applicable 30-day rolling average emission limits in Section V of the Consent Decree.
 - d. Describe the status of any operation and maintenance work relating to activities required under the District Court Consent Decree.

Frequency of submittal of the compliance demonstration: Semi-annual (monitoring); Annually

SECTION 3B-2. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: C6 **General Reference:** COMAR 26.11.09.05A(2), .06B, .07A(2)(c), .08C(2)(h); 40 CFR 60.42, 60.43; Permit 24-510-0314 Section IV, Condition 2.1

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Visible Emissions –

COMAR 26.11.09.05A(2) - “a person may not cause or permit the discharge of emissions from fuel burning equipment, other than water in an uncombined form, which is visible to a human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity”. Exceptions: Section A(1) and (2) do not apply to emissions during load changing, soot blowing, start-up, or occasional cleaning of control equipment if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.

B. NOx Emissions

- (1) COMAR 26.11.09.08B(1)(a) – “Emission Standards and Requirements. A person who owns or operates and installation that causes NOx emissions subject to this regulation is in compliance with this regulation if the person establishes compliance with the emissions standards in B(1)(c) of this regulation.”

- (2) COMAR 26.11.09.08B(1)(c) – Emission Standards in Pounds of NOx per Million Btu of heat input

Fuel	Tangential-Fired	Wall-Fired
Gas only	0.20	0.20
Gas/Oil	0.25	0.25
Coal (dry bottom)	0.38	0.38
Coal (wet bottom)	1.00	1.00

- (3) COMAR 26.11.09.08B(2)(a)(i), (b), (c), and (d) – Control of NOx Emissions for Major Stationary Sources – Demonstration of Compliance
 - a. “A person subject to a NOx emission standard in this regulation shall demonstrate compliance as follows:
 - i. For installations equipped with a CEM, compliance with the NOx emissions standards in this regulation shall be established using CEM data; or
 - ii. Not applicable.
 - b. “CEMS shall be certified in accordance with 40 CFR 60, Appendix B, or Part 75, Appendix A.”
 - c. “CEMS shall meet the quality assurance criteria in 40 CFR 60, Appendix F, or, for sources subject to Title IV of the Clean Air Act (Acid Rain), the quality assurance criteria in 40 CFR 75, Appendix B.”
 - d. “Except as otherwise established by the Department and approved by EPA, for a person who establishes compliance with the NOx emissions standards in this regulation using a CEM, compliance shall be determined as 30-day rolling averages.”
 - e. Not applicable.
- (4) COMAR 26.11.09.08B(5) – Operator Training.
 - a. “For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.
 - b. The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department.”
- (5) COMAR 26.11.09.08C(3) – “A person who owns or operates fuel burning equipment with a rated heat input capacity of 250 Million Btu per hour or greater shall install, operate, calibrate, and maintain a certified NOx CEM or an alternative NOx monitoring method approved by the Department and the EPA on each installation.
- (6) **Consent Decree JKB-12-1408, Section V(11)(a) and V(10)(d), and MDE PTC 510-5-1476 (August 28, 2014), Modified Consent Decree (August 5, 2013) and EPA letter (April 2, 2014)** - The Permittee shall design and operate the ultra-low NOx burners on Boilers 1-4 and the low NOx burner on Boiler 6 to meet the emission ate of 500 lbs/day (or 624 lbs/day, when appropriate) on a 30-day rolling average.
- (7) **Consent Decree JKB-12-1408, Section V(11)(a), and MDE PTC 510-5-1444 – 5-1447 (August 28, 2014), Modified Consent Decree (August 5, 2013) and EPA letter (April 2, 2014)** – The primary combined NOx emissions limit that applies to the operation of Boilers 1-4 and 6 is 500 lb/day, calculated on a 30-day rolling average as described in the Consent Decree. Exception for the limit of 624 lbs/day are:
 - a. Any day in which:
 - i. Boiler 6 operates at any point in time;

- ii. Boiler 6 operates in conjunction with any of the CE boilers, or;
- iii. Boiler 6 does not operate and only three (3) of the CE boilers operate would count toward the 500 lb/day 30-day rolling average.
- b. If there are seven (7) calendar days within a 30 day period in which Boiler 6 does not operate and each of the four CE boilers operates for some period of time in that calendar day, then the combined NOx emission limit is 624 lbs/day. The seven days do not need to be consecutive.
- c. ASR will calculate the 30-day rolling average each day. If all four CE boilers operated for six days or less within the previous 30 calendar day period, the limit of 500 lbs/day applies. If all four CE boilers operated seven days or more during the previous 30 calendar day period, the limit of 624 lbs/day applies.
- (8) **Consent Decree JKB-12-1408, Section V(13), and MDE PTC 510-5-1476 (August 28, 2014), Modified Consent Decree(August 5, 2013) and EPA letter (April 2, 2014)** – The total combined NOx emissions from Boilers 1-4 and 6 in any consecutive 12 month period shall not exceed 60 tons.
- (9) **Consent Decree JKB-12-1408, Section V(14) and MDE PTC 510-5-1476 (August 28, 2014)** – The total combined NOx emissions from Boilers 1-4 and 6 in any calendar month shall not exceed 6.0 tons.
- (10) **40 CFR 60.44b(l)(1), 40 CFR 60.44(h), 40 CFR 60.44b(i), and 40 CFR 60.46b(a), and MDE PTC 510-5-1476 (August 28, 2014)** - The Permittee shall not cause to be discharged into the atmosphere any gases that contain NOx (expressed as NO2) in excess of 86 ng/J (0.20 lb/MMBtu) heat input. This limit applies at all times including periods of startup, shutdown, or malfunction. Compliance with this emission limit is determined on a 30-day rolling average basis.
- (11) **Consent Decree JKB-12-1408, Section V(11)(b), and MDE PTC 510-5-1476 (August 28, 2014), Modified Consent Decree (August 5, 2013) and EPA letter (April 2, 2014)** - The Permittee shall continuously operate the low NOx burner at all times of boiler operation.
- E. Operational Limitations**
 - (1) **MDE PTC 510-5-1476 (August 28, 2014)** – Burn only Natural Gas in this boiler
 - (2) **40 CFR 60.48(j)(2) and MDE PTC 510-5-1476 (August 28, 2014)** – Must use gaseous fuels with potential SO2 emissions rates of 26 ng/J (0.060 lb/MMBtu) or less and shall not use a post-combustion technology to reduce SO2 or PM emissions. The Permittee must meet these requirements in order to not be required to install or operate a COMS.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
- ☒ Annual Compliance Certification: _____
- ☒ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference: Consent Decree JKB-12-1408, Section V(15) - (21); COMAR 26.11.01.11C, .11B(1)(a), .11B(4), .11D(2); 40 CFR 60.48b; Permit 24-510-0314 Cond IV. 2.3

Describe:

A. Visible Emissions

None

B. NOx Emissions

- (1) At the point in each stack at which the boiler flue gas combines with flue gas from any other boiler, install and make operational, concurrent with commencement of operations of the ultra-low NOx burners, a NOx continuous emissions monitoring system (CEMS) to monitor NOx emissions in accordance with 40 CFR 60. The CEMS shall be installed and operated in accordance with the plan approved by the Department and EPA under the provisions of COMAR 26.11.01.11B(1)(a).
- (2) Calibrate, maintain, and operate a continuous emissions monitoring system, and record the output of the system for measuring NOx emissions in accordance with 40 CFR 60.48(b)(1).
- (3) Each CEMS shall be installed, certified, calibrated, maintained, and operated in accordance with the applicable requirements of 40 CFR 60, and any requirements established by applicable Maryland regulations.
- (4) Install, calibrate, maintain, and operate CEMS for measuring NOx and O2 (or CO2) emission discharged to the atmosphere, and record the output of the system.
- (5) The procedures of 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring system. The span value for NOx is 500 ppm.
- (6) The CEMS shall monitor and record the applicable NOx Emission Rate for Boiler 6 to demonstrate compliance with the NOx Emission Rates and shall be continuously operated, except during CEMS breakdowns, repairs, calibration checks, and zero span adjustments.
- (7) The CEMS shall be operated and data recorded during all periods of operation of Boiler 6 except for CEMS breakdowns and repairs. Data recorded during calibration checks, and zero and span adjustments.
- (8) Measure all emissions of NOx with the CEMS. During any periods of time when any CEMS is inoperable or not measuring NOx emissions from Boiler 6, the Permittee shall apply the missing data substitution procedures provided in 40 CFR 75, Subpart D.
- (9) To comply with the annual emission cap, the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the total amount of NOx emissions for the current month and the previous eleven months.
- (10) To comply with the monthly emission cap, the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the total amount of NOx emissions for each operating day during the month.
- (11) The 1-hour average NOx emission rates measured by the continuous NOx monitor required by 40 CFR 60.48b(b) and 60.13(h) shall be expressed in ng/J or lb/MMBtu heat input and shall be used to calculate the average emission rates under 60.44b. The 1-hour averages shall be calculated using the data points required under 60.13(h)(2).
- (12) The Permittee shall use the alternative measurement method approved by the Department and EPA if the Permittee is unable to obtain emissions data from CEMS because of malfunction of the CEM for more than 2 hours in duration.
- (13) Ensure the CEMS used to monitor a gas concentration meets the quality assurance criteria of 40 CFR 60, Appendix F, as amended, which is incorporated by reference, or if applicable, the quality assurance criteria of 40 CFR 75, Appendix B, as amended.
- (14) The CEM used to monitor a gas concentration shall record not less than four equally spaced data points per hour and automatically reduce data in terms of averaging times consistent with the applicable emission standard per COMAR 26.11.01.11D(2).

C. Operational Limitations

The Permittee shall install meters to record the hours of operation of this boiler and shall maintain the monitoring records in an electronic format for at least five (5) years.

Testing: Reference COMAR 26.11.01.11E(2)(b), 40 CFR 60.46b(c), .46b(e)(1) and (3) ; Permit 24-510-0314 Cond IV.2.2

period. Maintain these reports on-site for at least two (2) years.

2. Submit notification of the date of initial startup of Boiler 6, as provided by 40 CFR 60.7. Notification shall include:
 - a. The design heat input capacity of Boiler 6 and identification of the fuel to be combusted;
 - b. If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuel under 40 CFR 60.44b(c), (d), (e), (i), (j), (k), 60.46b(h), or 60.48b(i); and
 - c. The annual capacity factor at which the Permittee anticipates operating the facility based on the natural gas fired.
3. Report orally or by electronic or facsimile transmission to the EPA and MDE, no later than 24 hours after Permittee knew or should have known of any violation of the District Court Consent Decree, any permit regulations, or any event that may pose an immediate threat to the public health or welfare or the environment.
4. COMAR 26.11.09.08K – Reporting Requirements
 - a. “When demonstration of compliance with the NOx emission standards in this regulation is based on CEM data, quarterly emission reports shall be submitted to the Department on or before the 30th day of the month following the end of each calendar quarter.
 - b. When compliance with this regulation is demonstrated by a stack test, the results of the stack tests required by this regulation shall be submitted to the Department within 45 days after completion of the test.
 - c. A person subject to this regulation shall maintain annual fuel use records on site for not less than 3 years, and make these records available to the Department upon request.”
5. Report to the Department, by telephone, any CEM system downtime that lasts or is expected to last more than 24 hours, but 10 am or the first regular business day following the breakdown. Also notify the Department, by telephone, when an out-of-service CEMS is back in operation.
6. The Permittee shall comply with the CEM system downtime reporting requirements of COMAR 26.11.01.11E:
 - a. All CEM system downtime that lasts or is expected to last more than 24 hours shall be reported to the Department by telephone before 10 am of the first regular business day following the breakdown.
 - b. The system breakdown report required by COMAR 26.11.01.11E(1)(a) shall include the reasons, if known, for the breakdown and the estimated period of time that the CEM will be down. The Permittee shall notify the Department by telephone when an out-of-service CEM is back in operation and producing valid data.
7. Submit to the Department quarterly, a CEMS summary report not later than 30 days following each calendar quarter to demonstrate compliance with the NOx emissions limits. The report shall include:
 - a. The cause, time periods, and magnitude of all emissions which exceed the applicable emission standards;
 - b. The source downtime including the time and date of the beginning and end of each downtime period and whether the source downtime was planned or unplanned;
 - c. The time periods and cause of all CEM downtime including records of any repairs, adjustments, or maintenance that may affect the ability of the CEM to meet performance specifications of emission data;
 - d. Quarterly totals of excess emissions, installation downtime, and CEM downtime during the calendar quarter;
 - e. Quarterly quality assurance activities;
 - f. Daily calibration activities that include reference values, actual values, absolute or percent of span differences, and drift status; and
 - g. Other information required by the Department that is determined to be necessary to evaluate the data, to ensure that compliance is achieved, or to determine the applicability of this regulation.
8. Submit within 30 days following each January 1st and July 1st, a semi-annual report to the EPA for the immediately preceding half-calendar year period. The report shall:
 - a. Identify any and all dates on which the Permittee has installed, or describe the progress of installation of the low NOx burner required for NOx control, emission limits, CEMS, and monitoring requirements, and describe any problems encountered or anticipated during such installation, together with implemented or proposed solutions;
 - b. Provide all CEMS data collected for Boiler 6 including an explanation of any periods of CEMS downtime together with any missing data for which American Sugar applied missing data substitution procedures, under Section VI.B of the Consent Order.
 - c. Demonstrate compliance with all applicable 30-day rolling average emission limits in Section V of the Consent Decree.
 - d. Describe the status of any operation and maintenance work relating to activities required under the District Court Consent Decree.

C. Operational Limitations

See recordkeeping and reporting requirements of Control of Nitrogen Oxides

Frequency of submittal of the compliance demonstration: Annually; Semi-annual monitoring

SECTION 3B-3. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: R29-1 **General Reference:** COMAR 26.11.06.02C(2), 03C(1); Permit 24-510-0314 Cond IV.3.1

Briefly describe the Emission Standard/Limit or Operational Limitation:

- A. Visible Emissions** - shall not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to a human observer.
- B. Particulate Emissions** - "A person may not cause or permit from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions, technological feasibility, practicality, economic impact, and the environmental consequences of the decision."

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
- ☒ Annual Compliance Certification: _____
- ☒ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06; Permit 24-510-0314 Cond IV.3.3

Describe:

A. Visible Emissions:

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

B. Particulate Matter Emissions

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.

Testing: Reference _____ **Describe:** _____

Record Keeping: Reference COMAR 26.11.03.06; Permit 24-510-0314 Cond IV.3.4

Describe:

All records must be maintained for a period of 5 years

A. Visible Emissions:

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request.

B. Particulate Matter Emissions:

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and
- (2) a log with records of the dates and description of maintenance activity performed.

Reporting: Reference COMAR 26.11.01.07C

Describe: Report of Excess Emissions

- (1) In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone.”
- (2) “Telephone reports of excess emissions shall include the following information:
 - (a) The identity of the installation and the person reporting;
 - (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides);
 - (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and
 - (d) The actual or probable cause of the excess emissions.”

Frequency of submittal of the compliance demonstration: Annual; Semi-annual monitoring

SECTION 3B-4. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: R29-3, -4; S7B-2; S7-12; S7-13; S7-14 **General Reference:** COMAR 26.11.06.02C(2), .03B(2); Permit 24-510-0314 Cond IV.4.1

Briefly describe the Emission Standard/Limit or Operational Limitation:

- A. Visible Emissions** - shall not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to a human observer.
- B. Particulate Emissions** - "A person may not cause or permit to be discharged into the outdoor atmosphere from any installation, particulate matter in excess of 0.03 gr/scfd (68.7 mg/dscm)."

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
- ☒ Annual Compliance Certification: _____
- ☒ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06; Permit 24-510-0314 Cond IV.4.3

Describe:

A. Visible Emissions:

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

B. Particulate Matter Emissions

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.

Testing: Reference _____ **Describe:** _____

Record Keeping: Reference COMAR 26.11.03.06; Permit 24-510-0314 Cond IV.4.4

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Describe:

All records must be maintained for a period of 5 years

A. Visible Emissions:

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request.

B. Particulate Matter Emissions:

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (2) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and
- (2) a log with records of the dates and description of maintenance activity performed.

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: Annual; Semi-annual monitoring

SECTION 3B-5. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: D28-1; D10-1, -2, -3 **General Reference:** COMAR 26.11.06.02C(2), 03B(2);
Permit 24-510-0314 Cond IV.5.1

Briefly describe the Emission Standard/Limit or Operational Limitation:

- A. Visible Emissions** - shall not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to a human observer.”
- B. Particulate Emissions** - “A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/scfd (68.7 mg/dscm)”

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
- ☒ Annual Compliance Certification: _____
- ☒ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06; Permit 24-510-0314 Cond IV.5.3

Describe:

A. Visible Emissions:

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

B. Particulate Matter Emissions

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.

Testing: Reference _____ Describe: _____

Record Keeping: Reference COMAR 26.11.03.06; Permit 24-510-0314 Cond IV.5.4

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Describe:

All records must be maintained for a period of 5 years.

A. Visible Emissions:

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request.

B. Particulate Matter Emissions:

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (1) a copy of the preventative maintenance plan for each dust collector;
- (2) records of the dust collector malfunctions and the corrective actions taken to bring it back into proper operation; and
- (3) a log with records of the dates and description of maintenance activity performed.

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: Annual; Semi-annual monitoring

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SECTION 3B-6. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: D2-1; U5-1 General Reference: COMAR 26.11.06.02C(2), 03C(1);
Permit 24-510-0314 Cond IV.6.1

Briefly describe the Emission Standard/Limit or Operational Limitation:

- A. **Visible Emissions** - shall not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to a human observer.
- B. **Particulate Emissions** - "A person may not cause or permit from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions, technological feasibility, practicality, economic impact, and the environmental consequences of the decision."

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
- ☒ Annual Compliance Certification: _____
- ☒ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06; Permit 24-510-0314 Cond IV.6.3

Describe:

A. Visible Emissions:

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

B. Particulate Matter Emissions

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.

Testing: Reference _____ Describe: _____

Record Keeping: Reference COMAR 26.11.03.06; Permit 24-510-0314 Cond IV.6.4

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Describe:

All records must be maintained for a period of 5 years

A. Visible Emissions:

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request.

B. Particulate Matter Emissions:

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (3) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and
- (2) a log with records of the dates and description of maintenance activity performed.

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: Annual; Semi-annual monitoring

SECTION 3B-7. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: S5-1, -2, -3, -4, -5, -6, -8A, -8B, -8C, -8D, -8E, -8F, -8G; S1-1; S7A-1; S7-5, -6, -7, -8A, -8B, -8C, -8D; S7-10A, -10B; S7B-1; S7-11A, -11B, -11C

General Reference: COMAR 26.11.06.02C(2), 03B(2), 03D, Permit 24-510-0314 Cond IV.7.1

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Visible Emissions - shall not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to a human observer.

B. Particulate Emissions

- (1) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/scfd (68.7 mg/dscm).
- (2) A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
- ☒ Annual Compliance Certification: _____
- ☒ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06; MDE PTC 510-8-0332 (July 10, 2003); Permit 24-510-0314 Cond IV.7.3

Describe:

A. Visible Emissions:

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

1. Inspect all process and/or control equipment that may affect visible emissions;
2. Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
3. Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
4. If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

B. Particulate Matter Emissions

1. The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.
2. The exhaust gases from two liquid sugar dryers (VD1 and VD-2), the liquid sugar coolers (VC-1) and three centrifugal separators (SK-1, SK-2, and SK-3) shall be vented through the cyclonic separator and the venturi scrubber, when the specialty sugar refining process is operating.

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3. The exhaust gases from the washout tanks/beater shall be vented through the rotoclone, when the specialty sugar refining process is operating.
4. The exhaust gases from the packing and conveying equipment shall be vented through the rotoclone and the venturi scrubber, when the specialty sugar refining process is operating.

Testing: Reference _____ Describe: _____

Record Keeping: Reference COMAR 26.11.03.06C; MDE PTC 510-8-0332; Permit 24-510-0314

Cond IV.7.4

Describe:

All records must be maintained for a period of 5 years.

A. Visible Emissions:

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request.

B. Particulate Matter Emissions:

1. Records of the amount and type of specialty sugar produced each month for the specialty sugar refining process equipped with four venturi scrubbers shall be kept at the site for at least five (5) years and shall be made available to the Department upon request.
2. The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:
 - a. a copy of the preventative maintenance plan for each dust collector;
 - b. records of the dust collector malfunctions and the corrective actions taken to bring it back into proper operation; and
 - c. a log with records of the dates and description of maintenance activity performed.

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: Annual; Semi-annual monitoring

SECTION 3B-8. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: S6-4,- 5, -6, -7 **General Reference:** COMAR 26.11.06.02A(2), .02C, .03B, .03D;
Permit 24-510-0314 Cond IV.8.1,
PTC 510-0314-8-0409

Briefly describe the Emission Standard/Limit or Operational Limitation:

Visible Emissions Standards:

1. A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.
2. General Exceptions. The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process malfunctions or adjustments, or occasional cleaning of control equipment if:
 - a. The visible emissions are not greater than 40 percent opacity; and
 - b. The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.

Particulate Matter

1. A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/scfd (68.7 mg/dscm).
2. A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:
 - a. Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
 - b. Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces, which can create airborne dusts.
 - c. Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.
 - d. Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results, as would covering the vehicles.
 - e. The paving of roadways and their maintenance in clear condition.
 - f. The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- [] Quarterly Monitoring Report: _____
- [X] Annual Compliance Certification: _____
- [] Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: _____ **Reference:** COMAR 26.11.03.06C, Permit 24-510-0314 Cond IV.8.3;
PTC 510-0314-8-0409

Describe:

A. Visible Emissions:

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

1. Inspect all process and/or control equipment that may affect visible emissions;
2. Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
3. Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
4. If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

B. Particulate Matter Emissions

1. The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.
2. The exhaust gases from the packing and conveying equipment shall be vented through the rotoclone and the venturi scrubber, when the specialty sugar refining process is operating.

Testing: Reference _____ **Describe:** _____

Record Keeping: _____ **Reference:** COMAR 26.11.03.06C; Permit 24-510-0314 Cond IV.8.4;
PTC 510-0314-8-0409

Describe:

All records must be maintained for a period of 5 years.

A. Visible Emissions:

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request.

B. Particulate Matter Emissions:

1. Records of the amount and type of specialty sugar produced each month for the specialty sugar refining process equipped with four venturi scrubbers shall be kept at the site for at least five (5) years and shall be made available to the Department upon request.
2. The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:
 - a. a copy of the preventative maintenance plan for each dust collector;
 - b. records of the dust collector malfunctions and the corrective actions taken to bring it back into proper operation; and
 - c. a log with records of the dates and description of maintenance activity performed.

Reporting: S6-7J **Reference:** COMAR 26.11.01.07C, MDE PTC 510-0314-8-0409 Cond B(2)(b)

Describe: Report of Excess Emissions

- (1) "In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone."

- (2) "Telephone reports of excess emissions shall include the following information:
- (a) The identity of the installation and the person reporting;
 - (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides);
 - (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and
 - (d) The actual or probable cause of the excess emissions."

Frequency of submittal of the compliance demonstration: Annual

SECTION 3B-9. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: S6-1, -1A, -2, -2A, -3, -3A, -8, -9 **General Reference:** COMAR 26.11.06.02A(2), .02C(2), .03B(2), .03D; Permit 24-510-0314
Cond IV.9.1

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Visible Emissions Standards:

1. A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.
2. General Exceptions. The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process malfunctions or adjustments, or occasional cleaning of control equipment if:
 - a. The visible emissions are not greater than 40 percent opacity; and
 - b. The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.

B. Particulate Matter

1. A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/scfd (68.7 mg/dscm).
2. A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:
 - a. Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
 - b. Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces, which can create airborne dusts.
 - c. Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.
 - d. Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results, as would covering the vehicles.
 - e. The paving of roadways and their maintenance in clear condition.
 - f. The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
- ☒ Annual Compliance Certification: _____
- ☐ Semi-Annual Monitoring Report: _____

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Methods used to demonstrate compliance:

Monitoring: Reference: COMAR 26.11.03.06C; Permit 24-510-0314 Cond IV.9.3

Describe:

A. Visible Emissions:

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

1. Inspect all process and/or control equipment that may affect visible emissions;
2. Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
3. Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
4. If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

B. Particulate Matter Emissions

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.

Testing: Reference _____ **Describe:** _____

Record Keeping: Reference COMAR 26.11.03.06C; Permit 24-510-0314 Cond IV.9.4

Describe:

All records must be maintained for a period of 5 years.

A. Visible Emissions:

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance; and make them available to the Department upon request.

B. Particulate Matter Emissions:

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- a. a copy of the preventative maintenance plan for each dust collector;
- b. records of the dust collector malfunctions and the corrective actions taken to bring it back into proper operation; and
- c. a log with records of the dates and description of maintenance activity performed.

Reporting: Reference _____ **Describe:** _____

Frequency of submittal of the compliance demonstration: Annual

SECTION 3B-10. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: S5-7, S7-15, S7-16 **General Reference:** COMAR 26.11.06.02C(2); 26.11.19.02I;
26.11.19.16C, .16D, .18B(1)(d), .18F,
26.11.35.01E, .04A, .04C, .04E, .04F;
Permit 24-510-0314 Cond IV.10.1

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Visible Emissions Standards:

A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.

B. VOC Emissions

Video Inkjet Packaging Lines (Registration No. 6-2018)

1. COMAR 26.11.19.02I - Good Operating Practices, Equipment Cleanup, and VOC Storage
 - a. The requirements in this section apply to a person who owns or operates an installation that is subject to any requirement in this chapter.
 - b. Good Operating Practices
 - i. A person who is subject to this section shall implement good operating practices to minimize VOC emissions into the atmosphere.
 - ii. Good operating practices shall, at a minimum, include the following:
 1. Provisions for training of operators on practices, procedures, and maintenance requirements that are consistent with the equipment manufacturers' recommendations and the source's experience in operating the equipment, with the training to include proper procedures for maintenance of air pollution control equipment;
 2. Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use;
 3. Minimize spills of VOC-containing cleaning materials;
 4. Convey VOC-containing cleaning materials from one location to another in closed containers or pipelines;
 5. Minimize VOC emissions from cleaning of storage, mixing, and conveying equipment;
 6. As practical, scheduling of operations to minimize color or material changes when applying VOC coatings or other materials by spray gun;
 7. For spray gun applications of coatings, use of high volume low pressure (HVLP) or other high efficiency application methods where practical; and
 8. As practical, mixing or blending materials containing VOC in closed containers and taking preventive measures to minimize emissions for products that contain VOC.
 - c. Equipment Cleanup
 - i. A person subject to this section shall take all reasonable precautions to prevent or minimize the discharge of VOC into the atmosphere when cleaning process and coating application equipment, including containers, vessels, tanks, lines, and pumps.
 - ii. Reasonable precautions for equipment cleanup shall, at a minimum, include the following:
 1. Storing all wastes and waste materials, including cloth and paper that are contaminated with VOC, in closed containers;
 2. Preparing written standard operating procedures for frequently cleaned equipment, including when practical, provisions for the use of low-VOC or non-VOC materials and procedures to minimize the quantity of VOC materials used;
 3. Using enclosed spray gun cleaning, VOC-recycling systems and other spray gun cleaning methods where practical that reduce or eliminate VOC emissions; and
 4. Using, when practical, detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines, containers, and process equipment.
 - d. VOC Storage and Transfer
 - i. A person subject to this section who stores VOCs shall, at a minimum, install conservation vents or other vapor control measures on storage tanks with a capacity of 2,000 gallons or more to minimize VOC emissions.

- ii. A person subject to this section shall, at a minimum, utilize vapor balance, vapor control lines, or other vapor control measure when VOCs are transferred from a tank truck into a stationary storage tank with a capacity greater than 10,000 gallons and less than 40,000 gallons that store VOCs or materials containing VOCs, other than gasoline, that have a vapor pressure greater than 1.5 psia.
2. COMAR 26.11.19.16C – Control of VOC Equipment Leaks – General Requirements
 “A person subject to this regulation shall comply with all of the following requirements:
 - a. Visually inspect all components on the premises for leaks at least once each calendar month;
 - b. Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date the leak was discovered, and the name of the person who discovered the leak. The tag shall remain in place until the leak has been repaired.
 - c. Take immediate action to repair all observed VOC leaks that can be repaired within 48 hours.
 - d. Repair all other leaking components not later than 15 days after the leak is discovered. If a replacement part is needed, the part shall be ordered within 3 days after discovery of the leak, and the leak shall be repaired within 48 hours after receiving the part.
 - e. Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipe fittings.
 - f. Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspections, and a list of leaks by tag identification number. The log shall be made available to the Department upon request. Leak records shall be maintained for a period of not less than 2 years from the date of their occurrence.”
3. COMAR 26.11.19.16D – Exceptions. Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, shall be identified in the log and included within the source’s maintenance schedule for repair during the next source shutdown.
4. COMAR 26.11.19.18B(1)(d) – Applicability. This regulation applies to a person, owner or operator who: (d) Performs digital imaging at a premises that causes VOC emissions of 20 pounds or more per day from all digital imaging at the premises.
5. COMAR 26.11.19.18F – General requirements for Digital Imaging. A person who owns or operates digital imaging that is subject to this regulation may not cause the discharge of VOC emissions into the atmosphere in excess of 100 pounds on an day from the digital printing at the premises.

Packaging Adhesive Fugitive Lines (Registration No. 9-1298)

6. COMAR 26.11.35.01E – Applicability and Exemptions. The provisions of Regulation .04A and D of this chapter do not apply to the use of adhesives, sealants, adhesive primers, sealant primers, cleanup solvents, and surface preparation solvents if:
 - a. The total volume of noncomplying adhesives, sealants, primers, cleanup solvents, and surface preparation solvents applied facility-wide does not exceed 55 gallons per calendar year; and
 - b. The person claiming the usage exemption under E(1) of this regulation maintains monthly operations records sufficient to demonstrate compliance as required by Regulation .05A of this chapter.
 - c. Note: In any calendar year in which ASR uses more than 55 gallons of packaging adhesives, ASR must meet the requirements of COMAR 26.11.35.04A and D.
7. COMAR 26.11.35.04A – Standards. Except as provided in Section E of this regulation and Regulation .01 of this chapter, on and after January 1, 2009, a person may not: (3) Use or apply an adhesive, sealant, adhesive primer, or sealant primer within the State that exceeds the applicable VOC content limits specified in Table 1.
8. COMAR 26.11.35.04G - Table 1

VOC Content Limits for Adhesives, Sealants, Adhesive Primers, Sealant Primers, and Adhesives Applied to Particular Substrates		
Adhesive, sealant, adhesive primer, or sealant primer	VOC content limit	
Category	VOC (grams per liter*)	VOC (pounds per gallon*)
Adhesives applied to the listed substrates		
Porous material	120	1.00

*The VOC content is determined as the weight of volatile compounds less water and exempt compounds, as specified in Regulation .06 of this chapter.

9. COMAR 26.11.25.04C – Surface Preparation or Cleaning Solvent
 - a. This section applies to a person subject to this chapter using a surface preparation or cleanup solvent.
 - b. Except as provided in C(3) of this regulation for single-ply roofing, a person may not use materials for surface

<p>preparation containing VOCs unless the VOC content of the surface preparation solvent is less than 70 grams per liter.</p> <ul style="list-style-type: none"> c. If a surface preparation solvent is used in applying single-ply roofing, a person may not use materials for surface preparation containing VOCs unless the composite vapor pressure, excluding water and exempt compounds, of the surface preparation solvent does not exceed 45 millimeters of mercury at 20°C. d. Except as provided in C(5) of this regulation, a person may not use materials containing VOCs for the removal of adhesives, sealants, or adhesive or sealant primers from surfaces, other than spray application equipment, unless the composite vapor pressure of the solvent used is less than 45 millimeters of mercury at 20°C. e. Removal of an adhesive, sealant, adhesive primer, or sealant primer from the parts of spray application equipment shall be performed as follows: <ul style="list-style-type: none"> i. In an enclosed cleaning system or equivalent cleaning system as determined by the test method identified in Regulation .06H of this subchapter; ii. Using a solvent with a VOC content less than or equal to 70 grams of VOC per liter of material; or iii. Parts containing dried adhesive may be soaked in a solvent if the composite vapor pressure of the solvent, excluding water and exempt compounds is less than or equal to 9.5 millimeters of mercury at 20°C and the parts and solvent are in a closed container that remains closed except when adding parts to or removing parts from the container. <p>10. COMAR 26.11.35.04E – Standards. A person using adhesives, sealants, adhesive primers, sealant primers, surface preparation solvents, or cleanup solvents subject to this chapter shall store or dispose of all absorbent materials such as cloth or paper, that are moistened with adhesives, solvents, primers, or solvents subject to this chapter in nonabsorbent containers that are closed except when placing materials in or removing materials from the container.</p> <p>11. COMAR 26.11.35.04F – Standards. A person may not solicit, require the use, or specify the application of an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent, or cleanup solvent if the use or application results in a violation of this chapter. This requirement applies to all written or oral contracts under which an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent, or cleanup solvent subject to this chapter is to be used at a location in the State.</p> <p>Permit Shield Request: <u>Yes</u></p>

Compliance Demonstration:

Check appropriate reports required to be submitted:

- [] Quarterly Monitoring Report: _____
- [X] Annual Compliance Certification: _____
- [] Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference: COMAR 26.11.03.06C; 26.11.19.16C and D;
26.11.36.04C; 26.11.36.04E; Permit 24-510-0314 Cond IV.10.3

Describe:

A. VOC Emissions

Video Inkjet Packaging Lines (Registration No. 6-2018)

1. The Permittee shall conduct facility-wide inspections at least once per calendar month to determine the compliance status of facility operations with regard to implementation of "good operating practices" designed to minimize emissions of VOC.
2. The Permittee shall:
 - a. Visually inspect all components (process equipment, storage tanks, pumps, compressors, valves, flanges, pipeline fittings, pressure relief valves) at the facility for VOC leaks at least once each calendar month;
 - b. Tag any VOC leak immediately with identification number, the date the leak was discovered, and the name of the person who discovered the leak. The tag shall remain in place until the VOC leak is repaired;
 - c. Take immediate action to repair/control all observed VOC leaks that can be repaired within 48 hours.
 - d. Repair all other VOC leaking components not later than 15 days after the leak is discovered in accordance with COMAR 26.11.19.16C(4);
 - e. If a replacement part is needed, it shall be ordered within 3 days after discovery of the VOC leak and the leak shall be repaired within 48 hours after receiving the part;
 - f. Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced; and
 - i. Identify in a log components that cannot be repaired as required by this regulation because they are inaccessible, or that cannot be repaired during operation of the source, and include them within the source's maintenance schedule for repair during the next source shutdown.

Packaging Adhesive Fugitive Lines (Registration No. 9-1298)

3. The Permittee shall not use any adhesive with a VOC content of greater than 1.0 pound per gallon (120 grams per liter). The VOC content is determined as the weight of volatile compounds, less water and exempt compounds as specified in COMAR 26.11.36.06.
4. The Permittee shall not use materials for surface preparation containing VOCs unless the VOC content of the surface preparation is less than 70 grams per liter.
5. The Permittee may not use materials containing VOCs for the removal of adhesives, sealants, or adhesive or sealant primers from surfaces, other than spray application equipment, unless the composite vapor pressure of the solvent used is less than 45 millimeters of mercury at 20°C. Removal of an adhesive, sealant, adhesive primer, or sealant primer from the parts of spray application equipment shall be performed according to COMAR 26.11.36.04C(4) and (5).
6. The Permittee shall store or dispose of all absorbent materials such as cloth or paper, that are moistened with adhesives, solvents, primers, or solvents subject to COMAR 26.11.36 in nonabsorbent containers that are closed except when placing materials in or removing materials from the container.

Testing: Reference _____ **Describe:** _____

Record Keeping: Reference COMAR 26.11.03.06C; 26.11.19.02, .16C(6), .18G;
Permit 24-510-0314 Cond IV.10.4

Describe:

All records must be maintained for a period of 5 years.

A. Visible Emissions:

See Reporting requirements.

B. VOC Emissions:

Video Inkjet Packaging Lines (Registration No. 6-2018)

1. The Permittee shall maintain:
 - a. Written descriptions of all “good operating practices” designed to minimize emissions of VOC from facility-wide operations.
 - b. Records of all inspections conducted to determine the facility’s compliance status with regard to implementation of “good operating practices” designed to minimize emission of VOC from facility-wide operations. The records shall include for each inspection the name of the inspector, the date and time of the inspection, and an account of the findings.
2. The Permittee shall maintain:
 - a. Maintain a log that includes the name of the person conducting the inspection, the date on which VOC leak inspection was made, the findings of the inspection, a list of VOC leaks by tag identification number, the date the part was ordered, and the date the VOC leak was repaired; and
 - b. Make the log available to the Department upon request and shall be maintained for a period of not less than two years from the date of the VOC leaks’ occurrence.
3. A person subject to this regulation shall maintain the following records for not less than 3 years, and make the records available to the Department upon request: COMAR 26.11.19.18G(3) – The VOC content of each ink, coating, cleanup material, or any other material containing VOC that is used at the premises.

Reporting:

Reference: COMAR 26.11.01.07; Permit 24-510-0314 Cond IV.10.5

Describe:

A. Visible Emissions:

The Permittee shall report all occurrences of excess emissions to the Department.

B. VOC Emissions:

Video Inkjet Packaging Lines (Registration No. 6-2018)

1. Good operating practices information as required by COMAR 26.11.19.02I shall be made available to the Department upon request.
2. VOC leak inspection logs as required by COMAR 26.11.19.16 shall be made available to the Department upon request.

Video Inkjet Packaging Lines (Registration No. 6-2018)

3. The Permittee shall report all occurrences of excess emissions to the Department.

Frequency of submittal of the compliance demonstration: Annual

SECTION 3B-11. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: Ion Exchange System **General Reference:** COMAR 26.11.06.02C(2), .03B(2)(a), .03C, .03D; Permit 24-510-0314
Cond IV.11.1

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Visible Emissions - shall not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to a human observer.

B. Particulate Emissions

- (1) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/scfd (68.7 mg/dscm).
- (2) A person may not cause or permit emissions from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions. In making this determination, the Department shall consider technological feasibility, practicality, economic impact, and the environmental consequences of the decision.
- (3) A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
- ☒ Annual Compliance Certification: _____
- ☒ Semi-Annual Monitoring Report: _____

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Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference COMAR 26.11.03.06C; MDE PTC 510-8-0386 (November 18, 2013);
Permit 24-510-0314 Cond IV.11.4

Describe:

All records must be maintained for a period of 5 years.

A. Visible Emissions:

The Permittee shall maintain at the facility for at least five (5) years, and shall make them available to the Department upon request, records necessary to support annual certifications of emissions.

B. Particulate Matter Emissions:

The Permittee shall maintain the following records for at least five (5) years and shall be made available to the Department upon request:

1. Annual HCl throughput for each tank and resin bed.
2. Annual salt throughput for each salt saturator.
3. All written descriptions of "good operating practices" designed to minimize emissions of HAP.
4. HAP leak detection and repair logs that include identification of the persons who conducted the leak detection inspections, the dates on which the inspections were conducted, the findings during the inspections, a listing by tag identification number and a description of all leaks discovered, and the date and nature of all leak repairs effected.

Reporting: _____ Reference: COMAR 26.11.01.07 ; Permit 24-510-0314 Cond IV.11.5

Describe:

A. Visible Emissions

1. The Permittee shall submit to the Department by April 1 of each year a certification of emissions for the previous calendar year.
2. The Permittee shall report all occurrences of excess emissions to the Department.

B. Particulate Matter

1. The Permittee shall submit to the Department by April 1 of each year a certification of emissions for the previous calendar year.
2. The Permittee shall report all occurrences of excess emissions to the Department.

Frequency of submittal of the compliance demonstration: Annual; Semi-annual monitoring

SECTION 3B-12. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: S-1, S-2, S-3, S-4 **General Reference:** COMAR 26.11.06.02C(2), .03B(2)(a), .03D; PTC 510-0314-8-0410 & 8-0411

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Visible Emissions - shall not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to a human observer.

B. Particulate Emissions

- (1) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/scfd (68.7 mg/dscm).
- (2) A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
- ☒ Annual Compliance Certification: _____
- ☒ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06; PTC 510-3014-8-0410 & 8-0411

Describe:

A. Visible Emissions:

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

5. Inspect all process and/or control equipment that may affect visible emissions;
6. Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
7. Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
8. If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

B. Particulate Matter:

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.

Testing: Reference _____ Describe: _____

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Record Keeping: Reference COMAR 26.11.03.06C; MDE PTC 510-0314-8-0410 & 0411

Describe:

All records must be maintained for a period of 5 years.

A. Visible Emissions:

The Permittee shall maintain, and make available to the Department upon request,

- a) A record of the results of the monthly inspections and the log of inspection and maintenance.
- b) A log with records of the dates and description of maintenance activities performed.

Reporting: Reference: COMAR 26.11.01.07; MDE PTC 510-0314-8-0410 & 0411

Describe:

The permittee shall report, in accordance with the requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Administration.

Frequency of submittal of the compliance demonstration: Annual; Semi-annual monitoring

SECTION 3B-13. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: 250kW Emergency Generator **General Reference:** COMAR 26.11.09.05E, .07A(2),.08G; 40 CFR 63 Subparts A and ZZZZ; Permit 24-510-0314 Cond IV.12.1

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Visible Emissions

COMAR 26.11.09.05E – Stationary Internal Combustion Engine Powered Equipment

E(2) - A person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.

E(3) - A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity

E(4) - Exceptions

- (a) Section E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 minutes for the purpose of clearing exhaust system.
- (b) Section E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:
 - i. Engines that are idled continuously when not in service: 30 minutes
 - ii. All other engines: 15 minutes
- (c) The above conditions (E(2) and (3)) do not apply while maintenance, repair, or testing is being performed by qualified mechanics.

B. Sulfur Emissions

COMAR -26.11.09.07A(2) – A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of which otherwise exceeds the following limitations: (b) Distillate fuel oils, 0.3 percent.

C. NOx Emissions

COMAR 26.11.09.08G(1) – A person who owns or operates fuel-burning equipment with a capacity factor (as defined in 40 CFR 72.2) of 15 percent or less shall:

1. Provide certification of the capacity factor of the equipment to the Department in writing;
2. For fuel-burning equipment that operates more than 500 hours during a calendar year, perform combustion analysis and optimize combustion at least once annually;
3. Maintain the results of the combustion analysis at the site for at least 2 years and make these results available to the Department and EPA upon request;
4. Require each operator of an installation, except combustion turbines, to attend operator training program at least once every 3 years, on combustion optimization that are sponsored by the Department, EPA, or equipment vendors; and
5. Maintain a record of training program attendance for each operator at the site, and make these records available to the Department upon request.

Note: COMAR 26.11.09.08B(5)(a) states that “for the purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficiency operation.”

D. Carbon Monoxide Emissions - 40 CFR 63, Subparts A and ZZZZ (RICE)

1. 40 CFR 63.6595(a)(1) – “... if you have an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013”
2. 40 CFR 63.6603 – Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in 63.6620 and Table 4 of this subpart.

If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements of Table 2b of this subpart that apply to you.

Table 2d to Subpart ZZZZ of Part 63 – Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

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As stated in 63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

For each...	You must meet the following requirement, except during periods of startup...	During periods of startup you must...
4. Emergency stationary CI RICE and black start stationary CI RICE ²	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; ¹	
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and	
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	

¹ Sources have the option to utilize an oil analysis program as described in 63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.

² If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State, and local law under which the risk was deemed unacceptable.

3. 40 CFR 63.6605 – General requirements

- a. You must be in compliance with the emission limitations and operating limitations in this subpart that apply to you at all times.
- b. At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
- ☒ Annual Compliance Certification: COMAR 26.11.03.06G(6)
- ☒ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C, 26.11.03.09.07, 26.11.09.08G(1)(b) and (d); Permit 24-510-0314 Cond IV. 12.3

Describe:

A. Visible Emissions

The Permittee shall properly operate and maintain the engine in a manner to minimize visible emissions.

B. Sulfur Emissions

Obtain certification from the fuel supplier indication the oil complies with the limitation on the sulfur content (0.3% by weight).

C. NOx Emissions

Calculate the capacity factor within 30 days after the end of each month. If any engine operates more than 500 hours during a calendar year, perform a combustion analysis and optimize combustion at least once every year.

D. Carbon Monoxide

1. 63.6625(e)(3) – If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions: (3) an **existing emergency** or black start stationary RICE located at an area source of HAP emissions.
2. 63.6625(f) – If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP or an **existing emergency stationary RICE located at an area source of HAP emissions**, you must install a non-resettable hour meter if one is not already installed.
3. 63.6625(h) – If you operate a new, reconstructed, or **existing stationary engine**, you must minimize the engine's time spent in idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2s, 2c, and 2d to this subpart apply.
4. 63.6625(i) – If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 % of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.
5. 63.6640(a) – You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Tables 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 of this subpart.
6. 63.6640(b) – You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Tables 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in 63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.
7. 63.6640(f) – Requirements for *emergency stationary RICE*.
 1. If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that was installed on or after June 12, 2006, or an **existing emergency stationary RICE located at an are source of HAP emissions**, you must operate the emergency stationary RICE according to the requirements in (f)(1)(i) through (ii) of this section. Any operation other than emergency operation, and maintenance and testing, as described in (f)(1)(i) through (ii) of this

section, is prohibited. If you do not operate the engine according to the requirements of (f)(1)(i) through (ii) of this section, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.

- i. There is no time limit on the use of emergency stationary RICE in emergency situations.
- ii. You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. 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 Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.
- iii. Not applicable per COMAR 26.11.36.03A(1).

Testing: _____ **Reference:** COMAR 26.11.03.06C; Permit 24-510-0314 Cond IV.12.2

Describe:

A. NO_x Emissions

Perform a combustion analysis and optimize combustion at least once annually for any of the engines that operates more than 500 hours during a calendar year.

Record Keeping: Reference COMAR 26.11.03.06C, 26.11.09.08.G(1)(c) and (e);
Permit 24-510-0314 Cond IV.12.4

Describe:

All records must be maintained for a period of 5 years.

A. Visible Emissions

The Permittee shall retain records of preventive maintenance on site for at least five years and make these records available to the Department upon request.

B. Sulfur Emissions:

The Permittee shall keep records of annual fuel supplier certifications make the records available to the Department upon request.

C. NO_x Emissions

1. The Permittee shall maintain a record of the calculated capacity factor.
2. For any engine that operates more than 500 hours in a calendar year, the Permittee shall maintain records of the results of the combustion analysis at site for two years and make these results available to the Department and EPA upon request.
3. The Permittee shall maintain a record of training program attendance for each operator at the site for at least five years and make the records available to the Department upon request.

D. Carbon Monoxide

1. 63.6655(e) - You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE:
63.6655(e)(2) – An existing stationary emergency RICE.
63.6655(e)(3) – An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.
2. 63.6655(f) - If you own or operate any of the stationary RICE in paragraphs f(1) or (2), you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.
(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

Reporting: _____ **Reference** COMAR 26.11.09.07C, 26.11.03.06C, 26.11.09.08G(e)
Permit 24-510-0314 Cond IV.12.5

Describe:

A. Visible Emissions

The Permittee shall report incidents of visible emissions in the Report of Excess Emissions and Deviations (Plant-wide condition)

B. Sulfur Emissions:

The Permittee shall report fuel supplier certification to the Department upon request.

C. NO_x Emissions

The Permittee shall submit records of combustion analysis and combustion analysis performed and capacity factor of the equipment to the Department as part of the April 1 Certification Report

D. Carbon Monoxide

Report failure to perform the management practice on the schedule required and the Federal, State, or local law under which the risk was deemed unacceptable.

Frequency of submittal of the compliance demonstration: Annual; Semi-annual monitoring

SECTION 3B-14. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: Plant wide **General Reference:** COMAR 26.11.06.03D
Permit 24-510-0314 Cond III.1

Briefly describe the Emission Standard/Limit or Operational Limitation: Particulate Matter from Construction and Demolition

The Permittee shall not cause or permit any building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

☐ Quarterly Monitoring Report: _____

☒ Annual Compliance Certification: _____

☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference _____ Describe: _____

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: Annual

SECTION 3B-15. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: Plant wide **General Reference:** COMAR 26.11.07
Permit 24-510-0314 Cond III.2

Briefly describe the Emission Standard/Limit or Operational Limitation: Open Burning

Except as provided in COMAR 26.11.07.04, the Permittee shall not cause or permit an open fire from June 1 through August 31 of any calendar year. Prior to open burning, the Permittee shall request and receive approval from the Department.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
☒ Annual Compliance Certification: _____
☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference _____ Describe: _____

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: Annual

SECTION 3B-16. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: Plant wide **General Reference:** COMAR 26.11.05.04
Permit 24-510-0314 Cond III.3

Briefly describe the Emission Standard/Limit or Operational Limitation: Air Pollution Episode

When requested by the Department, the Permittee shall prepare in writing standby emissions reduction plans, consistent with good industrial practice and safe operating procedures, for reducing emissions creating air pollution during periods of Alert, Warning, and Emergency of an air pollution episode.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

☐ Quarterly Monitoring Report: _____

☒ Annual Compliance Certification: _____

☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference _____ Describe: _____

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: Annual

SECTION 3B-17. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: Plant wide **General Reference:** COMAR 26.11.01.07 and 26.11.03.06C(7); Permit 24-510-0314 Cond III.4

Briefly describe the Emission Standard/Limit or Operational Limitation: Excess Emission and Deviations

The Permittee shall comply with the reporting requirements for occurrences of excess emissions and deviations from the requirements of this permit, including the State-only Enforceable Conditions

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

☐ Quarterly Monitoring Report: _____

☒ Annual Compliance Certification: _____

☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference _____ Describe: _____

Reporting: Reference COMAR 26.11.01.07 and 26.11.03.06C(7)

Describe:

a) Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation;

b) Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence;

c) When requested by the Department, the Permittee shall report all deviations from permit conditions, including those attributed to malfunctions as defined in COMAR 26.11.01.07A, within 5 days of the request by submitting a written description of the deviation to the Department. The written report shall include the cause, dates and times of the onset and termination of the deviation, and an account of all actions planned or taken to reduce, eliminate, and prevent recurrence of the deviation.

d) The permittee shall submit to the Department semi-annual monitoring reports that confirm that all

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required monitoring was performed, and that provide accounts of all deviations from permit requirements that occurred during the reporting periods. This reporting requirement does **not** apply to the State-only enforceable requirements included in the permit. Reporting periods shall be January 1 through June 30 and July 1 through December 31, and reports shall be submitted within 30 days of the end of each reporting period. Each account of deviation shall include a description of the deviation, the dates and times of onset and termination, identification of the person who observed or discovered the deviation, causes and corrective actions taken, and actions taken to prevent recurrence. If no deviations from permit conditions occurred during a reporting period, the Permittee shall submit a written report that so states.

e) When requested by the Department, the Permittee shall submit a written report to the Department within 10 days of receiving the request concerning an occurrence of excess emissions. The report shall contain the information required in COMAR 26.11.01.07D(2).

Frequency of submittal of the compliance demonstration: Annually; semi-annually for Condition d.

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SECTION 3B-18. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: Plant wide General Reference: COMAR 26.11.03.03B(23). 40 CFR 68
Permit 24-510-0314 Cond III.5

Briefly describe the Emission Standard/Limit or Operational Limitation: Accidental Release Provisions

Should the Permittee become subject to 40 CFR 68 during the term of the permit, the Permittee shall submit risk management plans by the date specified in 40 CFR 68.150 and shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance recertification. The Permittee shall initiate a permit revision or reopening according to the procedures of 40 CFR 70.7 to incorporate appropriate permit conditions into the Part 70 permit.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

☐ Quarterly Monitoring Report: _____

☒ Annual Compliance Certification: _____

☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference _____ Describe: _____

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: Annual

SECTION 3B-19. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: Plant wide **General Reference:** COMAR 26.11.01.04, 26.11.03.06C(5)
Permit 24-510-0314 Cond III.6 ,7, 11

Briefly describe the Emission Standard/Limit or Operational Limitation: General Testing Requirements
The Department may require the Permittee to conduct, or have conducted, testing to determine compliance with the permit. The Department, at its option, may witness or conduct these tests.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
☒ Annual Compliance Certification: _____
☒ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference COMAR 26.11.01.04 (Permit Condition III.6)

Describe: Test at a reasonable time, and all information generated during a testing operation shall be provided to the Department.

Emissions Test Methods COMAR 26.11.01.04 (Permit Condition III.7): Compliance with emissions standards and limitations shall be determined by the test methods designated and or other test methods submitted to and approved by the Department. Reference documents include: a) 40 CFR 60, Appendix A; b) 40 CFR 51, Appendix M; c) The Department's Technical Memorandum 91-01 "Test Methods and Equipment Specifications for Stationary Sources", Jan 1991, as amended through Supplement 2 (July 1, 1992).

Record Keeping: Reference COMAR 26.11.03.06C(5), (Permit Condition III.11)

Describe: Gather and retain the following information when sampling and testing for compliance demonstrations:

- a. The location as specified in the permit, and the date and time that samples and measurements are taken;
- b. All pertinent operating conditions existing at the time that samples and measurements are taken;
- c. The date that each analysis of a sample or emissions test is performed and the name of the person taking the sample or performing the emissions test;
- d. The identity of the Permittee, individual, or other entity that performed the analysis;
- e. The analytical techniques and methods used; and
- f. The results of each analysis.

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: Annual; semi-annual monitoring

SECTION 3B-20. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: Plant wide **General Reference:** COMAR 26.11.01.05-1(B) and (C), 26.11.02.19C, and .19D; Permit 24-510-0314 Cond III.8, 9

Briefly describe the Emission Standard/Limit or Operational Limitation: Emissions Statements and Compliance Certification

B. General Requirements.

(1) By April 1 of each year, a person subject to this regulation shall submit to the Department an emissions statement for the previous calendar year that meets the requirements of this regulation.

(2) A person submitting an emissions statement shall certify that the information in the emissions statement is accurate to the person's best knowledge. The certifying individual shall be:

(a) Familiar with each installation and source for which the statement is submitted; and

(b) Responsible for the accuracy of the statement.

(3) If actual emissions from a source or premises equal or exceed the applicable emission levels prescribed in §A(1) or (2) of this regulation, an emissions statement is required for that year and each following year unless the source demonstrates, to the satisfaction of the Department, that emissions have been permanently reduced and the source no longer has the potential to emit emissions that exceed the applicable levels.

C. Emissions Statement Content. Emissions statements required by §B of this regulation shall be organized by premises, submitted on a form obtained from the Department, and include the following information:

(1) Identification of each installation or source at the premises that discharges VOC or NOx, and the actual daily and annual emissions from each installation or source.

(2) An explanation of the method used to determine emissions from each installation or source and operating schedules and production data that were used to determine emissions;

(3) An explanation for any increases or decreases in emissions for each installation or source if reported emissions differ from the emissions reported in the previous year's emissions statement; and

(4) Other relevant information as required by the Department.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

☐ Quarterly Monitoring Report: _____

☒ Annual Compliance Certification: COMAR 26.11.03.06G(6)

☒ Semi-Annual Monitoring Report: COMAR 26.11.03.06C(7)

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Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference COMAR 26.11.02.19C; Permit 24-510-0314 Cond III.8.c

Describe: Maintain records to support the emissions certification including:

- 1) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants.
- 2) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;
- 3) Amounts, types and analyses of all fuels used;
- 4) Emissions data from continuous emissions monitors that are required by the permit, including monitor calibration and malfunction information;
- 5) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment, including: a) significant maintenance performed, b) malfunctions and downtime, and c) episodes of reduced efficiency of all equipment;
- 6) Limitations on source operation or any work practice standards that significantly affect emissions; and
- 7) Other relevant information as required by the Department.

Reporting: Reference COMAR 26.11.01.05-1, 26.11.02.19D, 26.11.03.06C(6) and (7); and Permit 24-510-0314 Cond III.9

Describe: Permittee shall submit emissions statement and certification, with proper content each year by April 1.

Compliance Certification Report shall be submitted to the Department and EPA Region III simultaneously.

The Compliance Certification Report shall include:

- 1) The identification of each term or condition of the permit which is the basis of the certification;
- 2) The compliance status;
- 3) Whether the compliance was continuous or intermittent;
- 4) The methods used for determining the compliance status of each source, currently and over the reporting period; and
- 5) Any other information required to be reported to the Department that is necessary to determine the compliance status of the Permittee with the permit.

Frequency of submittal of the compliance demonstration: Annually; semi-annual monitoring

SECTION 3B-21. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: Plant wide **General Reference:** COMAR 26.11.02.02F
Permit 24-510-0314 Cond III.10

Briefly describe the Emission Standard/Limit or Operational Limitation: Certification by Responsible Official

All application forms, reports, and compliance certifications submitted pursuant to this permit shall be certified by a responsible official as to truth, accuracy, and completeness. The Permittee shall expeditiously notify the Department of an appointment of a new responsible official.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
☒ Annual Compliance Certification: _____
☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference _____ Describe: _____

Reporting: Reference COMAR 26.11.02.02F (Permit Condition III.10) Describe: _____

The certification by the responsible official shall be in the following form:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Frequency of submittal of the compliance demonstration: Annual

SECTION 3B-22. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: Plant wide **General Reference:** COMAR 26.11.03.06C(5) and (6)
Permit 24-510-0314 Cond III.12

Briefly describe the Emission Standard/Limit or Operational Limitation: General Recordkeeping
The Permittee shall retain records of all monitoring data and information that support the compliance
certification for a period of five (5) years from the date of that monitoring, sample measurement,
application, report or emissions test was completed or submitted to the Department.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
☒ Annual Compliance Certification: _____
☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference COMAR 26.11.03.06C(5) and (6) Describe: _____
Records and support information include:

- a) All calibration and maintenance record;
- b) All original data collected from continuous monitoring instrumentation;
- c) Records which support the annual emissions certification; and
- d) Copies of all reports required by the permit.

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: Annual

SECTION 3B-23. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: Plant wide **General Reference:** 40 CFR 61, Subpart M
Permit 24-510-0314 Cond III.14

Briefly describe the Emission Standard/Limit or Operational Limitation: Asbestos Provisions
The Permittee shall comply with 40 CFR 61, Subpart M and when conducting any renovation or demolition
activities at the facility.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
☒ Annual Compliance Certification: _____
☐ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference _____ Describe: _____

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: Annual

SECTION 3B-24. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: Plant wide **General Reference:** 40 CFR 82, Subpart F
Permit 24-510-0314 Cond III.15

Briefly describe the Emission Standard/Limit or Operational Limitation: Ozone Depleting Regulations

The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F except as provided for MVAC's in subpart B:

- a) Persons opening appliances for maintenance, service, repair, or disposal shall comply with the prohibitions and required practices pursuant to 40 CFR 82.154 and 82.156
- b) Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158
- c) Persons performing maintenance, service, repairs or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161
- d) Persons performing maintenance, service, repairs or disposal of appliances shall certify with the Administrator pursuant to 40 CFR 82.162
- e) Persons disposing of small appliances, MVACs, and MVAC-like appliances as defined by 40 CFR 82.152, shall comply with recordkeeping requirements pursuant to 40 CFR 82.166
- f) Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156
- g) Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
- ☒ Annual Compliance Certification: _____
- ☐ Semi-Annual Monitoring Report: _____

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Methods used to demonstrate compliance:	
Monitoring: Reference _____	Describe: _____
Testing: Reference _____	Describe: _____
Record Keeping: Reference _____	Describe: _____
Reporting: Reference _____	Describe: _____

Frequency of submittal of the compliance demonstration: Annual

**SECTION 3C OBSOLETE, EXTRANEEOUS, OR INSIGNIFICANT PERMIT
CONDITIONS**

SECTION 3C. OBSOLETE, EXTRANEOUS, OR INSIGNIFICANT PERMIT CONDITIONS

List permit to construct conditions which should be considered to be obsolete, extraneous, or environmentally insignificant.

Emissions Unit No.: See Emission Point No. **Permit to Construct No.** N/A – Title V Conditions

Emissions Point No.	Date Permit Issued	Condition No.	Brief Description of Condition and Reason for Exclusion
C6	Nov 1, 2018	Section IV, Conditions 2.2B(1)(a), 2.5B(2), and 2.5B(3)	Initial performance testing conducted in 2018
R29-2	Nov 1, 2018	Section IV, Table IV-4	(New) Raw Sugar destroyed in 2021 fire; all conditions related to this source should be deleted
Plantwide	Nov 1, 2018	Section III.13	General Conformity only applies to the Federal Government.

SECTION 3D ALTERNATE OPERATING SCENARIOS

SECTION 3D. ALTERNATE OPERATING SCENARIOS

Emissions Unit No.: N/A

Briefly describe any alternate operating scenarios. Assign a number to each scenario for identification purposes.

[illegible]

**SECTION 3E CITATION TO AND DESCRIPTION OF APPLICABLE
FEDERALLY ENFORCEABLE REQUIREMENTS FOR AN ALTERNATE
OPERATING SCENARIO**

SECTION 3E. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS FOR AN ALTERNATE OPERATING SCENARIO

Scenario No.: N/A

Emissions Unit No.: General Reference:

Briefly describe any applicable Emissions Standard/Limits/Operational Limitations:

Compliance Demonstration

Methods used to demonstrate compliance:

Monitoring: Reference Describe:

Testing: Reference Describe:

Record Keeping: Reference Describe:

Reporting: Reference Describe:

Frequency of submittal of the compliance demonstration:

SECTION 4 CONTROL EQUIPMENT

SECTION 4-1.

CONTROL EQUIPMENT

1. <u>Associated Emissions Units No.</u> : D28-1	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
Sly Baghouse (RP-C-1) used to control emissions from the lime silo.	
4. Pollutants Controlled:	Control Efficiency:
PM	0.03 gr/scfd (Manufacturer's guarantee).
5. Capture Efficiency: 100%	

SECTION 4-2.

CONTROL EQUIPMENT

1. <u>Associated Emissions Units No.:</u> D10-1, -2, -3	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
(3) Saturators each equipped with demisters (RP-C-2, -3, -4, respectively) and then a Ducon Flue Gas	
Scrubber.	
4. Pollutants Controlled:	Control Efficiency:
PM	95%
5. Capture Efficiency: 100%	

SECTION 4-3.

CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> D5-1, S5-4	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
Rotoclone Scrubber (RP-C-10) associated with the scrap melter and Invert System.	
4. Pollutants Controlled:	Control Efficiency:
PM	95%
5. Capture Efficiency: 100%	

SECTION 4-4.

CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> S6-4	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
Rotoclone (RP-C-11) controls emissions from the BMA Granulator.	
4. Pollutants Controlled:	Control Efficiency:
PM	95%
5. Capture Efficiency: 100%	

SECTION 4-5.

CONTROL EQUIPMENT

1. <u>Associated Emissions Units No.:</u> S6-5 (S6-5A through S6-5J)	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
Wheelbrator dry filter (RP-C-12) controls emissions from the Sugar Packaging and Conveying System.	
4. Pollutants Controlled:	Control Efficiency:
PM	0.03 gr/scfd (Manufacturer's guarantee)
5. Capture Efficiency: 100%	

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SECTION 4-6.

CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> S6-6 (S6-6A through S6-6D)	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
Wheelbrator dry filter (RP-C-13) controls emissions from the Sugar Packaging and Conveying System.	
4. Pollutants Controlled:	Control Efficiency:
PM	0.03 gr/scfd (Manufacturer's guarantee)
5. Capture Efficiency: 100%	

SECTION 4-7.

CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> S6-7 (S6-7A through S6-7J)	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
Wheelbrator dry filter (RP-C-14) controls emissions from the Sugar Packaging and Conveying System.	
4. Pollutants Controlled:	Control Efficiency:
PM	0.03 gr/scfd (Manufacturer's guarantee)
5. Capture Efficiency: 100%	

SECTION 4-8.

CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> S1-1	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
Entoleter Vortex Scrubber (RP-C-15) controls emissions from the FEECO dryer.	
4. Pollutants Controlled:	Control Efficiency:
PM	95%
5. Capture Efficiency: 100%	

SECTION 4-9.

CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> S7A-1	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
Bin Tower Scrubber controls dust from the refined sugar storage bins as well as from other	
sources which are routed to the control device.	
4. Pollutants Controlled:	Control Efficiency:
PM	95%
5. Capture Efficiency: 100%	

SECTION 4-10. CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> S6-1, -1A, -2, -2A, 3-, -3A S6-8 S6-9	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
Three (3) MAC equipment dry filters (for sugar mills) (RP-C-16, -18, -20, respectively)	
Three (3) starch receiver filters (feeding the sugar mills) (RP-C-17, -19, 21, respectively)	
One (1) starch bin vent filter (RP-C-22)	
One (1) baghouse (RP-C-24) for the sugar pulverizer	
4. Pollutants Controlled:	Control Efficiency:
PM	0.03 gr/scfd (Manufacturer's guarantee)
5. Capture Efficiency: 100%	

SECTION 4-11. CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> S7-5, -6, -7	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
Three (3) filters for each of the Packaging Feed Tanks (RP-C-26, -27, -28, respectively)	
4. Pollutants Controlled:	Control Efficiency:
PM	0.03 gr/scfd (Manufacturer's guarantee)
5. Capture Efficiency: 100%	

SECTION 4-12. CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> S7-8 S7-10 S7-11	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
To control PM emissions from the packaging department:	
Rotoclone (RP-C-29) to control emissions from the Handi Pak, Fawema, Paxall, and Clouds packaging systems (S7-8).	
Wheelbrator baghouse (RP-C-32) to control emissions from the Hesser Bagging System (S7-10).	
Wheelabrator Baghouse (RP-C-30) to control emissions from the Super-Sack Sugar Packing Line (S7-11).	
4. Pollutants Controlled:	Control Efficiency:
PM	0.03 gr/scfd (Manufacturer's guarantee)
5. Capture Efficiency: 100%	

SECTION 4-13. CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> S7B-1	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
Entoleter Scrubber (RP-C-31) control emissions from bulk loading;	
DCL UN800 Dust Collectors (RP-C-31) control each of the three Truck Unloading Spouts.	
4. Pollutants Controlled:	Control Efficiency:
PM	95%
5. Capture Efficiency: 100%	

SECTION 4-14. CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> S5-8, -8B, -8D, -8E, -8F, -8G	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
To control PM emissions from powdered specialty products production:	
Two (2) venturi scrubbers (RP-C-33 and -34) for the dryers.	
Sly venture scrubber (RP-C-35) for the liquid sugar cooler.	
Sly Venturi scrubber (RP-C-36) for three (3) centrifugal separators and packaging and conveying equipment.	
Rotoclone for washout tanks and beater.	
4. Pollutants Controlled:	Control Efficiency:
PM	95%
5. Capture Efficiency: 100%	

SECTION 4-15. CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> D3-6, -7, -8, -9a, -9b, -9c, -10a, -10b, -10c, -10d, -11a, -11b, -12,	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
To control emissions from the Ion Exchange system:	
Scrubber (D3-6) from the HCl tank (D3-6A).	
Water Spray chamber (D3-11) for the salt saturators.	
4. Pollutants Controlled:	Control Efficiency:
PM	95%
5. Capture Efficiency: 100%	

SECTION 4-16. CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> S-1, S-2, S-3, S-4	2. <u>Emissions Point No.:</u>
3. <u>Type and Description of Control Equipment:</u>	
Schlenck Dust Collector (DC-1) to control emissions from new sugar silos elevator (BE-1) and belt conveyors (AC-2A, AC-2B, and AC-9).	
4. Pollutants Controlled:	Control Efficiency:
PM	0.002 gr/dscf (Manufacturer's guarantee)
5. Capture Efficiency: 100%	

SECTION 5 SUMMARY SHEET OF POTENTIAL EMISSIONS

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.

N/A – No emissions claim or dispute.

Pollutant					
CAS Number					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions					
Total					

SECTION 6 EXPLANATION OF PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

SECTION 6-1. EXPLANATION OF PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Describe and cite the applicable requirements to be exempted. Complete this Section only if the facility is claiming exemptions from or the non-applicability of any federally enforceable requirements.

1. Applicable Requirement:
40 CFR Part 64

2. Brief Description:

Compliance Assurance Monitoring (CAM) does not apply to the ASR Domino Sugar Refinery.

3. Reasons for Proposed Exemption or Justification of Non-applicability:

CAM does not apply because emission units at the Refinery do not use “control devices” (as defined in 40 CFR Part 64.1) to meet emission limitations or standards. Thus, the Refinery does not have pre-control device emissions, and is not subject to the applicability criteria of 40 CFR Part 64.2(a)(3) and 64.5(a). The Refinery baghouses/cyclones/dust collectors and venturi scrubbers/rotoclones are “inherent process equipment” as defined in 40 CFR Part 64.1.

SECTION 6-2. EXPLANATION OF PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Describe and cite the applicable requirements to be exempted. Complete this Section only if the facility is claiming exemptions from or the non-applicability of any federally enforceable requirements.

1. Applicable Requirement:

40 CFR Part 63, Subpart JJJJJ

2. Brief Description:

National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters [Boiler Generally Achievable Control Technology (GACT)]

3. Reasons for Proposed Exemption or Justification of Non-applicability:

Boiler GACT does not apply because ASR is exempt per 40 CFR 63.11195(e) because the facility only operates "gas-fired" boilers as defined in 40 CFR 63.11237. This definition allows the use of oil only during periods of gas curtailment or for periodic testing up to 48 hours per calendar year.

SECTION 6-3. EXPLANATION OF PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Describe and cite the applicable requirements to be exempted. Complete this Section only if the facility is claiming exemptions from or the non-applicability of any federally enforceable requirements.

1. Applicable Requirement:

40 CFR Part 68

2. Brief Description:

Risk Management Plan (Accidental Chemical Release) Provisions.

3. Reasons for Proposed Exemption or Justification of Non-applicability:

Facility does not have regulated pollutants in process or storage greater than the applicable threshold
quantities for accidental release prevention.

SECTION 6-4. EXPLANATION OF PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Describe and cite the applicable requirements to be exempted. Complete this Section only if the facility is claiming exemptions from or the non-applicability of any federally enforceable requirements.

1. Applicable Requirement:

COMAR 26.11.26.09 and 40 CFR Part 93, Subpart B

2. Brief Description:

General Conformity

3. Reasons for Proposed Exemption or Justification of Non-applicability:

Only applies to each department, agency, and instrumentality of the Federal Government.

SECTION 7 COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS

SECTION 7. COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS

N/A – In compliance with District Court Consent Decree, Civil Action No. JKB-12-1408

1. Emissions Unit #	Anticipated Compliance Date
Applicable Federally Enforceable Requirement being Violated:	

2. Description of Plan to Achieve Compliance:

Certified Progress Reports for sources in noncompliance shall be submitted at least quarterly to the Department.

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STATE-ONLY ENFORCEABLE REQUIREMENTS

STATE-ONLY ENFORCEABLE REQUIREMENTS

Facility Information:

Name of Facility: American Sugar Refining, Inc.	County Baltimore City
Premises Number: #0314	
Street Address: 1100 Key Highway East, Baltimore, MD 21230	
24-hour Emergency Telephone Number for Air Pollution Matters: (410) 752-6150	
<u>Type of Equipment (List Significant Units):</u> Combustion Units: Four (4) Combustion Engineering boilers (130 MMBtu/hr) firing Natural Gas and #2 fuel oil and one (1) Babcock & Wilcox boiler (300 MMBtu/hr) firing Natural Gas; equipped with a low-NOx burner and flue gas recirculation. Raw Sugar Unloading, conveying, storage Decolorization Units: Carbonatation Process – Lime Silo equipped with a baghouse Carbonatation Process – Saturators equipped with a baghouse Scrap Melter equipped with a Rotoclone scrubber Invert System (tanks) with a Rotoclone scrubber BMA Granulator equipped with a Entoleter scrubber One (1) 80 ton/hr Feeco rotary sugar dryer equipped with a Entoleter, Inc vortex scrubber Sugar Pulverizer equipped with a baghouse Sugar Conveying/Packaging Lines & Bulk Loading System Bulk Sugar Conveying System equipped with a baghouse Sugar Feed to all packages equipped with a baghouse Storage bins with scrubber Bulk loading system equipped with an Entoleter scrubber Hesser Bagging system equipped with a Wheelabrator baghouse Fawema, Paxall, and Clouds Packaging systems equipped with a rotoclone scrubber Packing Line for Super Sack with a Wheelabrator baghouse Powdered Specialty Sugars Processing Two Liquid sugar dryers with venturi scrubbers One liquid sugar cooler with Sly venturi scrubber Three centrifugal separators with venturi scrubber Washout tanks and beater with Rotoclone scrubber Ion Exchange System	

Equipment Added/Modified During the Permit Term

Bulk Powdered Sugar Tote Packaging Line

Four (4) sugar storage silos

Modification to the existing 10X Filler System

Conveyance system: Old Sugar to/from Storage Barge

**CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY
ENFORCEABLE REQUIREMENTS**

Registration No.: 5-1444, 5-1445, 5-1446, 5-1447

Emission Unit No.: CE Boilers 1-4 (C1 – C4)

General Reference: Permit 24-510-0314 Condition VI(1)(E); COMAR 26.11.01.11C

Briefly describe the requirement and the emissions limit (if applicable):

Quality Assurance for CEMS.

A CEM used to monitor a gas concentration shall meet the quality assurance criteria of 40 CFR
60, Appendix F, as amended, which is incorporated by reference, or if applicable, the quality
assurance criteria of 40 CFR 75, Appendix B, as amended.

Methods used to demonstrate compliance:

CEMS operated as required.

**CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY
ENFORCEABLE REQUIREMENTS**

Registration No.: 5-1476

Emission Unit No.: Boiler 6

General Reference: Permit 24-510-0314 Condition VI(1)(F)-(G); COMAR 26.11.40.03

Briefly describe the requirement and the emissions limit (if applicable):

NOx Ozone Season Emission Caps.

- B. The total combined NOx ozone season emissions for all non-trading large NOx units subject to this chapter may not exceed 1013 tons in accordance with the 40 CFR Part 97, Subpart E, Appendix C.
- C. (1) The total combined ozone season NOx emission from all the affected units at an affected source as identified in Regulation .02C of this chapter may not exceed the NOx ozone season emission caps in B(2) of this regulation.
- (2) American Sugar NOx Ozone Season Emission Cap = 24 tons

Monitoring and Reporting Requirements

- A. For non-trading large NOx units subject to this chapter, the owner or operator shall:
- a. Continuously monitor NOx emissions with a CEM system in accordance with 40 CFR Part 75, Subpart H and 40 CFR 51.121(i)(4); and
- b. Maintain records and submit reports regarding NOx emissions in accordance with 40 CFR Part 75.
- B. The owner or operator of a non-trading large NOx unit subject to this regulation shall include emissions data obtained from a CEM system pursuant to §A of this regulation in the CEM quarterly reports submitted to the Department pursuant to COMAR 26.11.01.11E(2).

Methods used to demonstrate compliance:

CEMS operated as required; records maintained and data submitted as required.

**CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY
ENFORCEABLE REQUIREMENTS**

Registration No.: 9-1293

Emission Unit No.: Emergency Generator (U11-2)

General Reference: Permit 24-510-0314 Condition VI(1)(F); COMAR 26.11.36.03A

Briefly describe the requirement and the emissions limit (if applicable):

Emergency Generators and Load Shaving Units NOx Requirements – Applicability and General Requirements for Emergency Generators and Load Shaving Units

(1) “The owner or operator of an emergency generator may not operate the generator except for emergencies, testing, and maintenance purposes.”

(2) Not applicable.

(3) Not applicable.

(4) “The owner of operator of an emergency generator or load shaving unit may be subject to the federal standards for stationary internal combustion engines under 40 CFR Parts 60 and 63.”

(5) “The owner or operator of an emergency generator or load shaving unit may not operate the engine for testing and engine maintenance purposes between 12:01 am and 2:00 pm on any day on which the Department forecasts that the air quality will be a code orange, code red, or code purple unless the engine fails a test and engine maintenance and a re-test are necessary.

(6) Not applicable.

Methods used to demonstrate compliance:

Emergency Generator is operated only in emergency situations.

**CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY
ENFORCEABLE REQUIREMENTS**

Registration No.: Plant-wide

Emission Unit No.: Plant-wide

General Reference: Permit 24-510-0314 Condition VI(1)(A)

Briefly describe the requirement and the emissions limit (if applicable):

Nuisance. "An installation or premises may not be operated or maintained in such a manner that a nuisance or air pollution is created. Nothing in this regulation relating to the control of emissions may in any manner be construed as authorizing or permitting the creation of, or maintenance of, nuisance or air pollution."

Methods used to demonstrate compliance:

Perform monthly inspections.

**CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY
ENFORCEABLE REQUIREMENTS**

Registration No.: Plant-wide

Emission Unit No.: Plant-wide

General Reference: Permit 24-510-0314 Condition VI(1)(B)

Briefly describe the requirement and the emissions limit (if applicable):

Odors. "A person may not cause or permit the discharge into the atmosphere of gases, vapors, or odors beyond the property line in such a manner that a nuisance or air pollution is created."

Methods used to demonstrate compliance:

Perform monthly inspections.

**CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY
ENFORCEABLE REQUIREMENTS**

Registration No.: Plant-wide

Emission Unit No.: Plant-wide

General Reference: Permit 24-510-0314 Condition VI(1)(C); COMAR 26.11.15.05C

Briefly describe the requirement and the emissions limit (if applicable):

Control Technology Requirements. "A person who complies with the ambient impact requirements in Regulation .06 of this chapter may not be affected by the amount of the installation's stack height that exceeds good engineering practice (GEP), or by any other dispersion technique.

(3) Unless an existing installation is controlled using T-BACT, the degree of emission limitation required in order to demonstrate compliance with Regulation .06 of this chapter shall not be affected by the amount of the installation's stack height that exceeds good engineering practice (GEP), or by any other dispersion technique."

Methods used to demonstrate compliance:

Stack height limitations as specified.

**CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY
ENFORCEABLE REQUIREMENTS**

Registration No.: Plant-wide

Emission Unit No.: Plant-wide

General Reference: Permit 24-510-0314 Condition VI(1)(D); COMAR 26.11.15.06

Briefly describe the requirement and the emissions limit (if applicable):

Ambient Impact Requirement – Requirements for Existing Installations, Sources, or Premises

(1) “Except as provided in Section B(3) of this regulation, a person may not cause or permit the discharge of a toxic air pollutant listed in COMAR 26.11.16.07 from an existing installation or source if total allowable emissions of that TAP from the premises will unreasonably endanger human health.

(2) A person shall demonstrate compliance with Section B(1) of this regulation using the procedures established in Regulation .07 of this chapter and COMAR 26.11.16.

(3) A person who owns or operates an existing premises shall meet the requirements of Sections B(1) and (2) of this regulation for each TAP listed in COMAR 26.11.16.07 by the applicable compliance dates listed in COMAR 26.11.16.07, or not later than 2 years after becoming subject to this chapter, whichever is later.”

Methods used to demonstrate compliance:

Will not emit listed TAPs in amounts to endanger human health.

**CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY
ENFORCEABLE REQUIREMENTS**

Registration No.: Plant-wide

Emission Unit No.: Plant-wide

General Reference: Permit 24-510-0314 Condition VI(2)

Briefly describe the requirement and the emissions limit (if applicable):

Recordkeeping and Reporting:

The Permittee shall submit to the Department, by April 1 of each year during the term of this permit,
a written certification of the results of an analysis of emissions of toxic air pollutants from the
Permittee's facility during the previous calendar year. The analysis shall include either:

(a) a statement that previously submitted compliance demonstrations for emissions of toxic
air pollutants remain valid; or

(b) a revised compliance demonstration, developed in accordance with requirements included
under COMAR 26.11.15 & .16, that accounts for changes in operations, analytical methods,
emissions determinations, or other factors that have invalidated previous demonstrations.

Methods used to demonstrate compliance:

Certification report submitted by April 1.

**CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY
ENFORCEABLE REQUIREMENTS**

Registration No.: Plant-wide

Emission Unit No.: Plant-wide

General Reference: COMAR 26.11.02.14D

Briefly describe the requirement and the emissions limit (if applicable):

Procedures for Obtaining State Permits to Operate and Permits to Construct Certain Sources and Permits to Construct Control Equipment on Existing Sources.

An application for a permit to construct may be submitted at any time. A complete application for an initial State permit to operate shall be submitted not later than 60 days before the source is to commence operating. A complete application for the renewal of a State permit to operate shall be submitted not later than 60 days before the expiration date in a State permit to operate. If a timely application for a renewal has been submitted, the current State permit to operate remains in effect until the Department makes a final decision to issue or deny the permit.

Methods used to demonstrate compliance:

Submit applications in a timely manner.

**CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY
ENFORCEABLE REQUIREMENTS**

Registration No.: Plant-wide

Emission Unit No.: Plant-wide

General Reference: COMAR 26.11.02.19C & D; Permit 24-510-0314

Briefly describe the requirement and the emissions limit (if applicable):

Fee Schedule: Title V Permit or a State Permit to Operate.

Information Required to be Maintained by a Source:

(1) Beginning January 1, 1994, the owner or operator of a source for which a permit to operate is required shall maintain records necessary to support the emission certification, including the following:

- (a) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;
- (b) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;
- (c) Amounts, types, and analyses of all fuels used;
- (d) Emission data from continuous emission monitors that are required by this subtitle or EPA regulations, including monitor calibration and malfunction information;
- (e) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment, including significant maintenance performed, malfunctions and downtime, and episodes of reduced efficiency of this equipment;
- (f) Limitations on source operation or any work practice standards that significantly affect emissions; and
- (g) Other relevant information as required by the Department.

(2) The logs and other records of information required by Section C(1) of this regulation shall be retained for a period of 5 years and made available to the Department upon request.

(3) "If the owner or operator of a source for which a permit to operate is required fails to maintain or provide the data required by this section, which the Department requests in order to verify the emissions during the previous calendar year, the annual emission-based fee for that source shall be based on the estimated allowable emissions, as defined in COMAR 26.11.01.01B(4), of that source, as determined by the Department."

Methods used to demonstrate compliance:

Logs of records required by COMAR 26.11.02.19C (1) shall be retained for a period of 5 years and made available to the Department upon request.

Emission Certification.

- (1) Beginning January 1, 1994, the responsible official designated by the owner or operator of a source for which a permit to operate is required shall certify, as provided at Regulation .02F of this chapter, the actual emissions of regulated air pollutants from all installations at the plant or facility.
- (2) Certification shall be on a form obtained from the Department and shall be submitted to the Department not later than April 1 of the year following the year for which certification is required.
- (3) An emission certification submitted pursuant to this section and which contains all information required by COMAR 26.11.01.05-1, for NOx and VOC, satisfies the requirements of COMAR 26.11.01.05-1.

**CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY
ENFORCEABLE REQUIREMENTS**

Registration No.: Plant-wide

Emission Unit No.: Plant-wide

General Reference: COMAR 26.11.01.11B(1), PTC 510-0314-5-1476 Part B(3)(a)

Briefly describe the requirement and the emissions limit (if applicable):

General Requirements for CEMS. An owner or operator subject to this regulation shall:

(1) Before installing a CEM, submit to the Department, for approval by the Department and EPA, a plan containing the CEM design specifications, proposed location, and a description of a proposed alternative measurement method; and

(2) Install and operate a CEM in accordance with the plan approved by the Department and EPA under the provisions of section B(1)(a) of this regulation.

Methods used to demonstrate compliance:

CEMS approved and installed as required.

INSIGNIFICANT ACTIVITIES LIST

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RENEWAL TITLE V APPLICATION INSIGNIFICANT ACTIVITIES LIST**

Check-off List of Emissions Units and Activities Exempt from the Part 70 Permit Application

Insignificant Activities

Place a check mark beside each type of emissions unit or activity that is located at the facility.
Where noted, please indicate the number of that type of emissions unit or activity located at the facility.

- (1) No. _____ Fuel burning equipment using gaseous fuels or no. 1 or no. 2 fuel oil, and having a heat input less than 1,000,000 Btu (1.06 gigajoules) per hour;
- (2) No. _____ Fuel-burning equipment using solid fuel and having a heat input of less than 350,000 Btu (0.37 gigajoule) per hour;
- (3) No. _____ Stationary internal combustion engines with less than 500 brake horsepower (373 kilowatts) of power output
- (4) ☒ Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (5) _____ Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;
- (6) No. 5 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;
- (7) _____ Commercial bakery ovens with a rated heat input capacity of less than 2,000,000 Btu per hour;
- (8) _____ Kilns used for firing ceramic ware, heated exclusively by natural gas, liquefied petroleum gas, electricity, or any combination of these;
- (9) _____ Confection cookers where the products are edible and intended for human consumption;
- (10) _____ Die casting machines;
- (11) _____ Photographic process equipment used to reproduce an image upon sensitized material through the use of radiant energy;
- (12) _____ Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RENEWAL TITLE V APPLICATION INSIGNIFICANT ACTIVITIES LIST**

- (13) ____ Brazing, soldering, or welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals and not directly related to plant maintenance, upkeep and repair or maintenance shop activities;
- (14) ____ Equipment for washing or drying products fabricated from metal or glass, provided that no VOC is used in the process and that no oil or solid fuel is burned;
- (15) ____ Containers, reservoirs, or tanks used exclusively for electrolytic plating work, or electrolytic polishing, or electrolytic stripping of brass, bronze, cadmium, copper, iron, lead, nickel, tin, zinc, and precious metals;
- (16) Containers, reservoirs, or tanks used exclusively for:
- (a) ____ Dipping operations for applying coatings of natural or synthetic resins that contain no VOC;
 - (b) ____ Dipping operations for coating objects with oils, waxes, or greases, and where no VOC is used;
 - (c) ✓ Storage of butane, propane, or liquefied petroleum, or natural gas;
 - (d) No. 4 Storage of lubricating oils;
 - (e) No. ____ Unheated storage of VOC with an initial boiling point of 300 °F (
 - (f) No. 2 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel,
 - (g) No. ____ Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;
 - (h) No. 1 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;
- (17) ____ Gaseous fuel-fired or electrically heated furnaces for heat treating glass or metals, the use of which does not involve molten materials;
- (18) Crucible furnaces, pot furnaces, or induction furnaces, with individual capacities of 1,000 pounds (454 kilograms) or less each, in which no sweating or distilling is conducted, or any fluxing is conducted using chloride, fluoride, or ammonium compounds, and from

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RENEWAL TITLE V APPLICATION INSIGNIFICANT ACTIVITIES LIST**

which only the following metals are poured or in which only the following metals are held in a molten state:

- (a)____ Aluminum or any alloy containing over 50 percent aluminum, if no gaseous chloride compounds, chlorine, aluminum chloride, or aluminum fluoride is used;
 - (b)____ Magnesium or any alloy containing over 50 percent magnesium;
 - (c)____ Lead or any alloy containing over 50 percent lead;
 - (d)____ Tin or any alloy containing over 50 percent tin;
 - (e)____ Zinc or any alloy containing over 50 percent zinc;
 - (f)____ Copper;
 - (g)____ Precious metals;
-
- (19) ☒ Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a total cooking area of 5 square feet (0.46 square meter) or less;
 - (20) ☒ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;
 - (21) ____ Certain recreational equipment and activities, such as fireplaces, barbecue pits and cookers, fireworks displays, and kerosene fuel use;
 - (22)____ Potable water treatment equipment, not including air stripping equipment;
 - (23)____ Firing and testing of military weapons and explosives;
 - (24)____ Emissions resulting from the use of explosives for blasting at quarrying operations and from the required disposal of boxes used to ship the explosive;
 - (25) ☒ Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;
 - (26)____ Grain, metal, or mineral extrusion presses;
 - (27)____ Breweries with an annual beer production less than 60,000 barrels;

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RENEWAL TITLE V APPLICATION INSIGNIFICANT ACTIVITIES LIST**

(28)____ Natural draft hoods or natural draft ventilators that exhaust air pollutants into the ambient air from manufacturing/industrial or commercial processes;

(29) ✓ Laboratory fume hoods and vents;

(30) No. ____ Sheet-fed letter or lithographic printing press(es) with a cylinder width of less than 18 inches;

For the following, attach additional pages as necessary:

(31) any other emissions unit, not listed in this section, with a potential to emit less than the “de minimus” levels listed in COMAR 26.11.02.10X (list and describe units):

No. 2 Aerosol can puncturing equipment

No. _____

No. _____

No. _____

No. _____

(32) any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act (list and describe):

No. _____

No. _____

No. _____

4.0 REFERENCES

Maryland Department of the Environment (MDE), Title V Permitting.

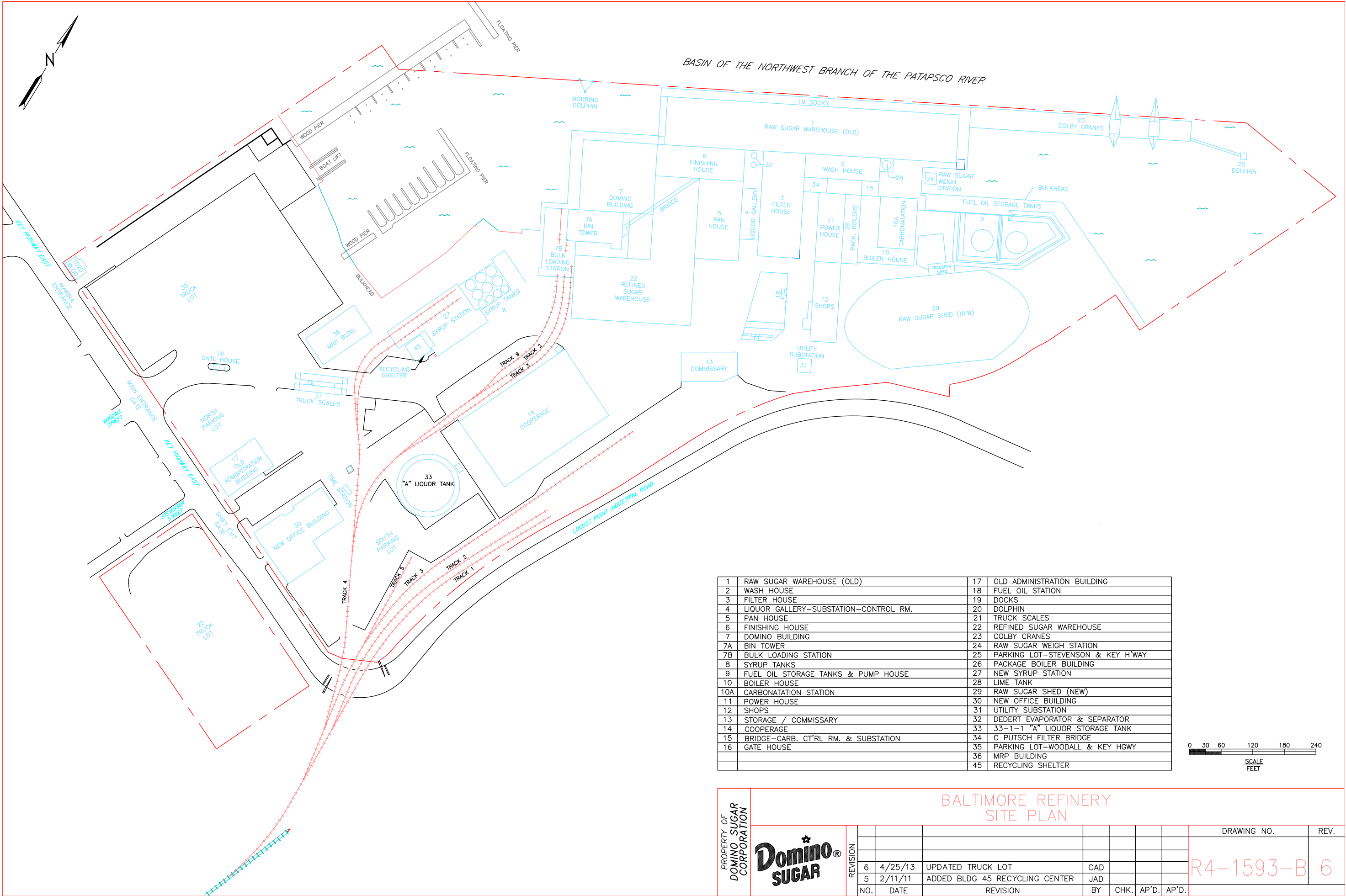
<https://mde.maryland.gov/programs/permits/AirManagementPermits/Pages/TitleVProgramInformation.aspx>

USEPA *White Paper for Streamlined Development of Part 70 Permit Applications*, July 10, 1995.

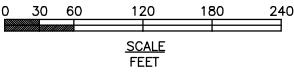
<https://www.epa.gov/sites/default/files/2015-08/documents/fnlwtppr.pdf>

White Paper No. 2 for Improved Implementation of the Part 70 Operating Permits Program,
March 5, 1996.. <https://www.epa.gov/sites/default/files/2015-08/documents/wtppr-2.pdf>

ATTACHMENT A SITE PLAN AND FLOW DIAGRAM

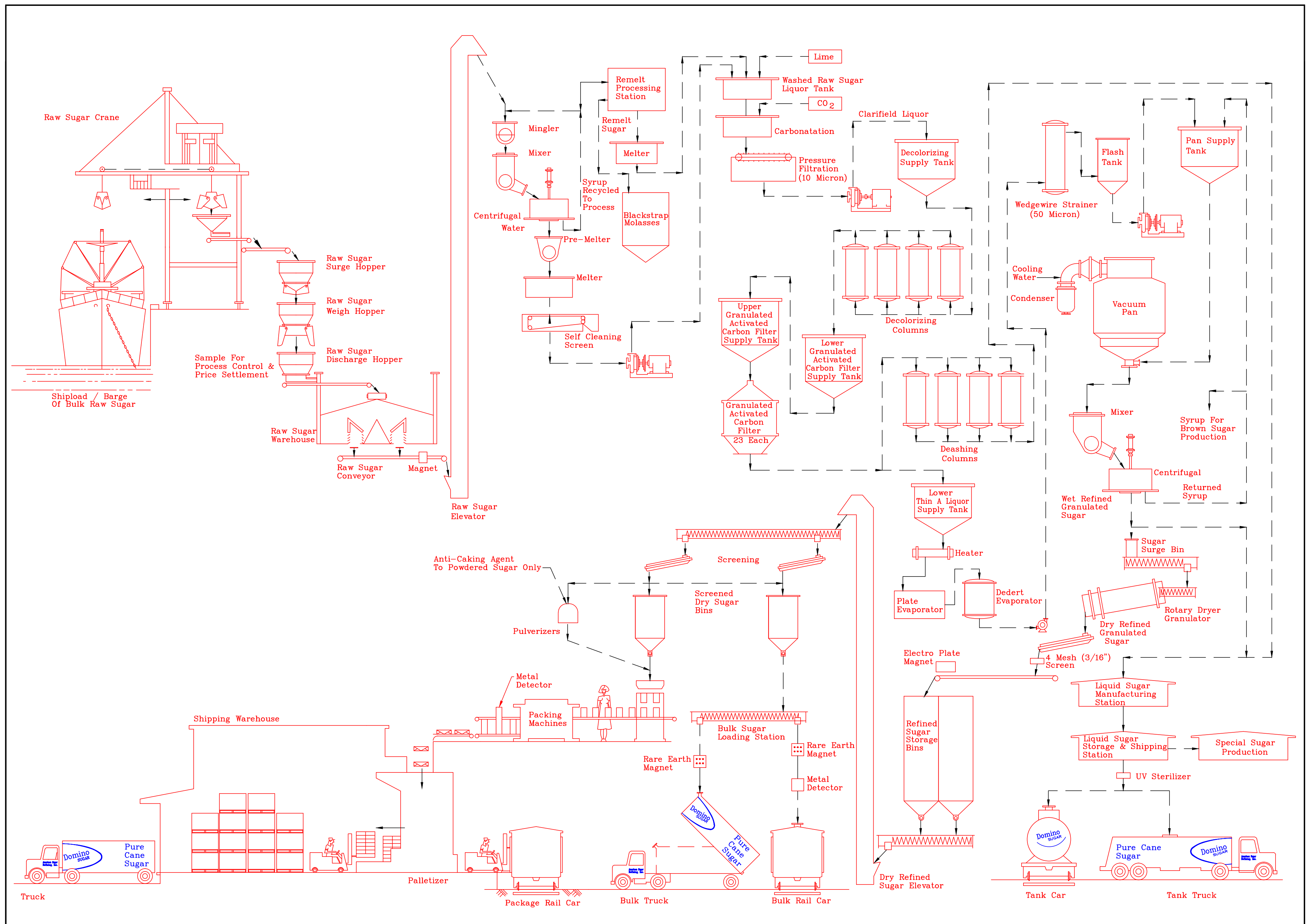


1	RAW SUGAR WAREHOUSE (OLD)	17	OLD ADMINISTRATION BUILDING
2	WASH HOUSE	18	FUEL OIL STATION
3	FILTER HOUSE	19	DOCKS
4	LIQUOR GALLERY-SUBSTATION-CONTROL RM.	20	DOLPHIN
5	PAN HOUSE	21	TRUCK SCALES
6	FINISHING HOUSE	22	REFINED SUGAR WAREHOUSE
7	DOMINO BUILDING	23	COLBY CRANES
7A	BIN TOWER	24	RAW SUGAR WEIGH STATION
7B	BULK LOADING STATION	25	PARKING LOT-STEVENSON & KEY H'WAY
8	SYRUP TANKS	26	PACKAGE BOILER BUILDING
9	FUEL OIL STORAGE TANKS & PUMP HOUSE	27	NEW SYRUP STATION
10	BOILER HOUSE	28	LIME TANK
10A	CARBONATION STATION	29	RAW SUGAR SHED (NEW)
11	POWER HOUSE	30	NEW OFFICE BUILDING
12	SHOPS	31	UTILITY SUBSTATION
13	STORAGE / COMMISSARY	32	DEDERT EVAPORATOR & SEPARATOR
14	COOPERAGE	33	33-1-1 "A" LIQUOR STORAGE TANK
15	BRIDGE-CARB. CT'RL RM. & SUBSTATION	34	C PUTSCH FILTER BRIDGE
16	GATE HOUSE	35	PARKING LOT-WOODALL & KEY HGWY
		36	MRP BUILDING
		45	RECYCLING SHELTER



PROPERTY OF DOMINO SUGAR CORPORATION	BALTIMORE REFINERY SITE PLAN									
		REVISION							DRAWING NO.	REV.
		6	4/25/13	UPDATED TRUCK LOT	CAD				R4-1593-B	6
		5	2/11/11	ADDED BLDG 45 RECYCLING CENTER	JAD					
		NO.	DATE	REVISION	BY	CHK.	AP'D.	AP'D.		

THE CANE SUGAR REFINING PROCESS AT BALTIMORE



ATTACHMENT B 2021 EMISSIONS CERTIFICATION REPORT



American Sugar Refining, Inc.
1100 Key Highway East
Baltimore, MD 21230

March 31, 2022

Maryland Department of the Environment
Air and Radiation Management Administration
1800 Washington Boulevard, Suite 715
Baltimore, Maryland 21230-1720
Attention: Laramie Daniel, Compliance Program

RE: Emissions Certification Report for 2021, Title V Operating Permit No. 24-510-00314

Dear Ms. Daniel:

Enclosed are two copies of the Emissions Certification Report for 2021 for American Sugar Refining, Inc., the Baltimore Domino Sugar Refinery.

Toxic Air Pollutants Report

The Refinery does not emit any toxic air pollutants (other than from fuel burning equipment) with the exception of hydrochloric acid (HCl). Based on the emission calculations outlined in the Permit to Construct for the facility's Ion Exchange system and actual throughput of concentrated and diluted HCl onsite, emissions for CY2021 were 0.038 lbs/day over 6,720 operating hours. This equated to just under 0.005 tons/year, with fugitive emissions being the primary factor.

Maryland Air Toxic Emission Certification Statement to comply with COMAR 26.11.15

The Maryland Air Toxic Regulations apply to American Sugar Refining, Inc., Baltimore Domino Sugar Refinery for Hydrochloric Acid gaseous emissions associated with the Ion Exchange System. Beyond this emission, no other toxic air pollutants are generated at the facility, other than those produced by fuel burning equipment (boilers and kilns), which are exempt from this regulation. The required screening for HCl per COMAR 26.11.16.02A was conducted. The calculations considered tank ventilation stacks, downwash, and fugitive emission rates from the same regulation. The facility was found to be below all required screen limits.

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather



American Sugar Refining, Inc.
1100 Key Highway East
Baltimore, MD 21230

and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Coricka V White

Coricka V. White
Plant Manager

3/31/2022

Date

Should you have any questions concerning this report or the supporting calculations, please feel free to contact me at (410) 783-8687 or karen.bakker@asr-group.com.

Sincerely,

Karen A Bakker

Karen Bakker
EHS Manager

MARYLAND DEPARTMENT OF THE ENVIRONMENT
Washington Boulevard, Suite 715 · Baltimore Maryland 21230-1720
410-537-3000 · 1-800-633-6101 · <http://www.mde.state.md.us>
Air and Radiation Management Administration
Air Quality Compliance Program
410-537-3220

FORM 1:

**GENERAL FACILITY INFORMATION
EMISSIONS CERTIFICATION REPORT**

Calendar Year: 2021

A. FACILITY IDENTIFICATION				Do Not Write in This Space	
Facility Name: American Sugar Refining, Inc. Address: 1100 Key Highway East City: Baltimore County: Baltimore City Zip Code: 21230-5180				Date Received Regional: Date Received State: AIRS Code: FINDS Code: SIC Code: Facility Number: TEMPO ID: Reviewed by:	
B. Briefly describe the major function of the facility Refining of raw sugar into finished products is the major function of this facility.					
C. SEASONAL PRODUCTION (% if applicable)					
Winter (Dec.-Feb.) 25	Spring (Mar – May) 25	Summer (Jun – Aug) 25	Fall (Sept – Nov) 25		
D. Explain any increases or decreases in emissions from the previous calendar year for each registration at this facility. Accounted for the clean-up/conveyance of remaining raw sugar from the burned out Raw Sugar Shed to barges as part of an approved emergency action. Accounted for the additional Permits to Construct and Permits to Operate for the bulk powdered sugar tote filling line, the modification to the 10X filling system, addition of four finished product silos, and addition of conveyance of raw sugar to and from barges.					
E. CONTROL DEVICE INFORMATION (for NOx and VOC sources only)					
Control Device		Capture Efficiency		Removal Efficiency	
Low NOx Burner Boiler 6					
Ultra Low NOx Burner Boilers 1-4					
I am familiar with the facility and the installations and sources for which this report is submitted. I have personally examined the information in this report, which consists of <u>68</u> pages (including attachments), and certify that the information is correct to the best of my knowledge.					
Coricka V. White Name (Print/Type)		Plant Manager Title		<div style="font-size: 1.5em;">3/31/2022</div> Date	
 Signature				(410) 951-5728 Telephone	
1/9/08					

2021 EMISSIONS CERTIFICATION REPORT

FORM 2:

Company: American Sugar Refining, Inc.

Facility ID#: 510-00314
Pollutant: VOC

Page 1 of 2
Calendar Year: 2021

Registration No./ Equip. Description	SCC Number	Fuel	Actual Emissions			Operating Schedule			TOSD lbs/dy	Operating Schedule		Estimation Method
			Tons/yr	lbs/dy	Hrs/dy	Dys/wk	Wk/yr	Dys/yr		Hrs/dy	Start	End
5-1444		natural gas/ Oil	S 1.00	7.49	24	7		268		24	N/A	N/A
C1 - Boiler #1			F									C3
5-1445		natural gas/ Oil	S 0.38	6.88	24	7		109		24	N/A	N/A
C2 - Boiler #2			F									C3
5-1446		natural gas/ Oil	S 0.48	7.55	24	7		127	33.67	24	N/A	N/A
C3 - Boiler #3			F									C3
5-1447		natural gas/ Oil	S 0.47	5.85	24	7		160		24	N/A	N/A
C4 - Boiler #4			F									C3
5-1476		natural gas	S 1.99	15.62	24	7		255		24	N/A	N/A
C6 - Boiler #6			F									C3
8-0205		natural gas	S 0.00	0.00	0	0	0	0	0.00	0	N/A	N/A
Char Kilns			F									C3
8-0301		flue gas *	S 0.59	4.22	24	7		280	5.94	24	N/A	N/A
Carbonation			F									C3
			S									
			F									
6-2021		N/A	S 0.39	2.78	24	7		280	2.78	24	N/A	N/A
Evaporators			F									C2
6-2018		N/A	S									
Pkg Video Inkjet Printers			F 1.81	12.91	24	7		280	12.91	24	N/A	N/A
9-1298		N/A	S									C2
Pkg Adhesive Fugitives			F 0.26	1.88	24	7		280	1.88	24	N/A	N/A
9-1293		Diesel Fuel	S 0.43	105.69	0.5	1	52	52	105.69	1	N/A	N/A
250 KW Emerg Generator			F									C3
Totals			7.80	170.88					162.88			

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/dy) are lbs/operating day of the source

TOSD - Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section need to be completed only for VOC and NOx sources

Emissions Estimation Method:

- A1 - U.S. EPA Reference Method
- A2 - Other Particulate Sampling Train
- A3 - Liquid Absorption Technique
- A4 - Solid Adsorption Technique
- A5 - Freezing - Out Technique
- A9 - Other, Specify

Fuel: include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

* Carbonation system uses 15% of flue gases from boilers when operating.

- C1 - User calculated based on source test or other measurements
- C2 - User calculated based on material balance using engineering knowledge of the process
- C3 - User calculated based on AP-42
- C4 - User calculated by best guess/engineering judgement
- C5 - User calculated based on a State or local agency emission factor
- C6 - New construction, not operational
- C7 - Source closed, operation ceased
- C8 - Computer calculated based on standard

FORM 2:

Company: American Sugar Refining, Inc.
 Facility ID#: 510-00314
 Pollutant: VOC
 Calendar Year: 2021
 Page 2 of 2

[illegible]

S - Stack Emissions

TOSD - Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April - September). This section need to be completed only for VOC and NO_x sources

Emissions Estimation Method:

- | | |
|---------------------------------------|--|
| A1 - U.S. EPA Reference Method | C1 - User calculated based on source test or other measurements |
| A2 - Other Particulate Sampling Train | C2 - User calculated based on material balance |
| A3 - Liquid Absorption Technique | C3 - User calculated based on AP-42 using engineering knowledge of the process |
| A4 - Solid Adsorption Technique | C4 - User calculated based on AP-42 |
| A5 - Freezing - Out Technique | C4 - User calculated by best guess/engineering judgement |
| A9 - Other, Specify | |

- C5 - User calculated based on a State or local agency emission factor
C6 - New construction, not operational
C7 - Source closed, operation ceased
C8 - Computer calculated based on standard

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

FORM 2:

Company: American Sugar Refining, Inc.

Calendar Year: 2021

S - Stack Emissions	F - Fugitive Emissions	Daily emissions (lbs/dy) are lbs/operating day of the source
1	1	1
2	2	2
3	3	3
4	4	4
5	5	5
6	6	6
7	7	7
8	8	8
9	9	9
10	10	10
11	11	11
12	12	12
13	13	13
14	14	14
15	15	15
16	16	16
17	17	17
18	18	18
19	19	19
20	20	20
21	21	21
22	22	22
23	23	23
24	24	24
25	25	25
26	26	26
27	27	27
28	28	28
29	29	29
30	30	30
31	31	31
32	32	32
33	33	33
34	34	34
35	35	35
36	36	36
37	37	37
38	38	38
39	39	39
40	40	40
41	41	41
42	42	42
43	43	43
44	44	44
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82	82	82
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84	84	84
85	85	85
86	86	86
87	87	87
88	88	88
89	89	89
90	90	90
91	91	91
92	92	92
93	93	93
94	94	94
95	95	95
96	96	96
97	97	97
98	98	98
99	99	99
100	100	100

Good - A good Ozone season day means a typical day of that period of the year during which conditions are generally favorable which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section need to be completed only for VOC and NOx sources

A1 - U.S. EPA Reference Method
A2 - Other Particulate Sampling Train
A3 - Liquid Absorption Technique
A4 - Solid Adsorption Technique
A5 - Freezing - Out Technique
A9 - Other, Society

C5 - User calculated based on a State or local agency emission factor
C6 - New construction, not operational
C7 - Source closed, operation ceased
C8 - Computer calculated based on standard

2021 EMISSIONS CERTIFICATION REPORT

FORM 2:

CRITERIA AIR POLLUTANTS

Company: American Sugar Refining, Inc.

Facility ID#: 510-00314

Pollutant: CO

Calendar Year: 2021

Registration No./ Equip. Description	SCC Number	Fuel	Actual Emissions		Operating Schedule			TOSD lbs/dy	Operating Schedule			Estimation Method	
			Tons/yr	lbs/dy	Hrs/dy	Dys/wk	Wk/yr		Dys/yr	Hrs/dy	Start	End	Method
5-1444		natural gas/ Oil	S	15.33	114.40	24	7		268	24	N/A	N/A	C3
C1 - Boiler #1			F										
5-1445		natural gas/ Oil	S	5.74	105.32	24	7		109	24	N/A	N/A	C3
C2 - Boiler #2			F										
5-1446		natural gas/ Oil	S	7.32	115.28	24	7		127	24	N/A	N/A	C3
C3 - Boiler #3			F										
5-1447		natural gas/ Oil	S	7.16	89.52	24	7		160	24	N/A	N/A	C3
C4 - Boiler #4			F										
5-1476		natural gas	S	30.42	238.56	24	7		255	24	N/A	N/A	C3
C6 - Boiler #6			F										
8-0205		natural gas	S	0.00	0.00	0	0	0	0	0	N/A	N/A	C3
Char Kilns			F										
8-0301		flue gas *	S	9.03	64.51	24	7		280	24	N/A	N/A	C3
Carbonatation			F										
			S										
9-1293		Diesel Fuel	F	1.17	286.89	0.5	1	52	52	1	N/A	N/A	C3
250 KW Emerg Generator													
			S										
			F										
			S * Carbonatation system uses 15% of flue gases from boilers when operating.										
			S										
			F										
			S										
			F										
Totals			76.17	1014.47								891.81	

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/dy) are lbs/operating day of the source

TOSD - Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section need to be completed only for VOC and NOx sources

Emissions Estimation Method:

- A1 - U.S. EPA Reference Method
- A2 - Other Particulate Sampling Train
- A3 - Liquid Absorption Technique
- A4 - Solid Adsorption Technique
- A5 - Freezing - Our Technique
- A9 - Other, Specify

- C1 - User calculated based on source test or other measurements
- C2 - User calculated based on material balance using engineering knowledge of the process
- C3 - User calculated based on AP-42
- C4 - User calculated by best guess/engineering judgement

- C5 - User calculated based on a State or local agency emission factor
- C6 - New construction, not operational
- C7 - Source closed, operation ceased
- C8 - Computer calculated based on standard

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

FORM 2:

Company: American Sugar Refining, Inc.

Pollutant: SO2

Calendar Year: 2021

Registration No./ Equip. Description	SCC Number	Fuel	Actual Emissions		Operating Schedule				TOSD lbs/dy	Operating Schedule			Estimation Method
			Tons/yr	lbs/dy	Hrs/dy	Dys/wk	Wk/yr	Dys/yr		Hrs/dy	Start	End	
5-1444		natural gas/ Oil	S	0.11	0.82	24	7		3.7	24	N/A	N/A	C3
C1 - Boiler #1			F										
5-1445		natural gas/ Oil	S	0.08	1.41	24	7			24	N/A	N/A	C3
C2 - Boiler #2			F										
5-1446		natural gas/ Oil	S	0.05	0.82	24	7			24	N/A	N/A	C3
C3 - Boiler #3			F										
5-1447		natural gas/ Oil	S	0.08	1.03	24	7			24	N/A	N/A	C3
C4 - Boiler #4			F										
5-1476		natural gas	S	0.22	1.70	24	7			24	N/A	N/A	C3
C6 - Boiler #6			F										
8-0205		natural gas	S	0.00	0.00	0	0	0	0.00	0	N/A	N/A	C3
Char Kilns			F										
8-0301		flue gas *	S	0.005	0.03	24	7		0.03	24	N/A	N/A	C3
Carbonation			F										C3
			S										
			F										
9-1293		Diesel Fuel		0.36	87.58	0.5	1	52	87.58	1	N/A	N/A	C3
250 KW Emerg Generator													
			S										
			F										
			S										
			F										
			S										
			F										
Totals				0.90	93.40				91.28				

TOSD - Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section need to be completed only for VOC and NOx sources

A1 - U.S. EPA Reference Method
A2 - Other Particulate Sampling Train
A3 - Liquid Absorption Technique
A4 - Solid Adsorption Technique
A5 - Freezing - Out Technique
A9 - Other, Specify

C5 - User calculated based on a State or local agency emission factor
C6 - New construction, not operational
C7 - Source closed, operation ceased
C8 - Computer calculated based on standard

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

2021 EMISSIONS CERTIFICATION REPORT

FORM 2:

CRITERIA AIR POLLUTANTS

Calendar Year: 2021

Pollutant: Lead

Facility ID#: 510-00314

Company: American Sugar Refining, Inc.

Registration No./ Equip. Description	SCC Number	Fuel		Actual Emissions		Operating Schedule			TOSD	Operating Schedule			Estimation Method	
				Tons/yr	lbs/dy	Hrs/dy	Dys/wk	Wk/yr		Dys/yr	Hrs/dy	Start		End
5-1444		natural gas/ Oil	S	0.0001	0.0007	24	7		268	N/A	24	N/A	N/A	C3
C1 - Boiler #1			F											
5-1445		natural gas/ Oil	S	0.0000	0.0008	24	7		109	N/A	24	N/A	N/A	C3
C2 - Boiler #2			F											
5-1446		natural gas/ Oil	S	0.0000	0.0007	24	7		127	N/A	24	N/A	N/A	C3
C3 - Boiler #3			F											
5-1447		natural gas/ Oil	S	0.0000	0.0006	24	7		160	N/A	24	N/A	N/A	C3
C4 - Boiler #4			F											
5-1476		natural gas	S	0.0002	0.0014	24	7		255	N/A	24	N/A	N/A	C3
C6 - Boiler #6			F											
8-0205		natural gas	S	0.0000	0.0000	0	0	0	0	N/A	0	N/A	N/A	C3
Char Kilns			F											
			S											
			F											
			S											
			F											
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2021 EMISSIONS CERTIFICATION REPORT

FORM 3: PM

Page 1 of 6
Calendar Year: 2021

PARTICULATE MATTER
Pollutant: PM
Facility ID#: 510-00314

Company: American Sugar Refining, Inc.

Registration No./ Equip. Description	SCC Number	Fuel	PM - Filterable Tons/yr	PM - Filterable Lbs/dy	PM10 - Filterable Tons/yr	PM10 - Filterable Lbs/dy	PM2.5 - Filterable Tons/yr	PM2.5 - Filterable Lbs/dy	PM Condensable Tons/yr	PM Condensable Lbs/dy	Operation Days/yr	Emissions Methods
5-1444		natural gas/Oil	S 0.35	2.59	0.35	2.59	0.35	2.59	1.04	7.76	268	C3
C1 - Boiler #1			F									
5-1445		natural gas/Oil	S 0.14	2.56	0.14	2.53	0.13	2.48	0.39	7.24	109	C3
C2 - Boiler #2			F									
5-1446		natural gas/Oil	S 0.17	2.61	0.17	2.61	0.17	2.61	0.50	7.82	127	C3
C3 - Boiler #3			F									
5-1447		natural gas/Oil	S 0.17	2.13	0.17	2.11	0.17	2.08	0.49	6.13	160	C3
C4 - Boiler #4			F									
5-1476		natural gas	S 0.69	5.40	0.69	5.40	0.69	5.40	2.06	16.19	255	C3
C6 - Boiler #6			F									
8-0205		natural gas	S 0.00	0.00	0.00	0.00	0.00	0.00	0.07	0.00	0	C3
Char Kilns			F									
8-0301		flue gas *	S 0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	280	C3
Carbonatation			F									
			S									
			F									
D3-11		Salt use	S								172	
Salt Saturator (Ion Exchange)			F 0.000332	0.001818	0.000332	0.001818	0.000332	0.001818	N/A	N/A		
9-1293		Diesel Fuel	S 0.38	93.62	0.38	93.62	N/A	N/A	N/A	N/A	52	C3
250 KW Emerg Generator			F									
			S									
			F									
			S									
			F									
			S									
			F									
Totals			1.8928	108.8965	1.8901	108.8548	1.5021	15.1500	4.5564	45.1374		

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/dy) are lbs/operating day of the source

TOSD - Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section need to be completed only for VOC and NOx sources

Emissions Estimation Method:

- A1 - U.S. EPA Reference Method
- A2 - Other Particulate Sampling Train
- A3 - Liquid Absorption Technique
- A4 - Solid Absorption Technique
- A5 - Freezing - Out Technique
- A9 - Other, Specify

* Carbonatation system uses 15% of flue gases from boilers when operating.

- C5 - User calculated based on a State or local agency emission factor
- C6 - New construction, not operational
- C7 - Source closed, operation ceased
- C8 - Computer calculated based on standard

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

2021 EMISSIONS CERTIFICATION REPORT

FORM 3: PM

Page 2 of 6
Calendar Year: 2021

PARTICULATE MATTER

Facility ID#: 510-00314 Pollutant: PM

Company: American Sugar Refining, Inc.

Registration No./ Equip. Description	SCC Number	Fuel	PM - Filterable		PM10 - Filterable		PM2.5 - Filterable		PM Condensable		Operation Days/yr	Emissions Methods
			Tons/yr	Lbs/dy	Tons/yr	Lbs/dy	Tons/yr	Lbs/dy	Tons/yr	Lbs/dy		
24-8-0217 & 0217M Char Dust		N/A	S 0.00	0.00	0.00	0.00	0.00	0.00	N/A	N/A	0	C4
24-8-0226 Sugar Melter		N/A	S 1.72	12.30	0.17	1.23	0.02	0.12	N/A	N/A	280	C4
24-8-0115 Sugar BMA		N/A	S 7.49	53.48	0.75	5.35	0.07	0.53	N/A	N/A	280	C4
24-8-0320 N Sugar Feeco Dryer		N/A	S 27.07	193.37	2.71	19.34	0.27	1.93	N/A	N/A	280	C4
8-0209 Sugar mills 1 & 2		N/A	S 1.55	11.10	0.16	1.11	0.02	0.11	N/A	N/A	280	C4
8-0125 Sugar Mill 3		N/A	S 1.44	10.29	0.14	1.03	0.01	0.10	N/A	N/A	280	C4
24-8-0266 Sugar mill 7		N/A	S 5.75	41.10	0.58	4.11	0.06	0.41	N/A	N/A	280	C4
24-8-0212 Bulk Sugar Conveying		N/A	S 13.25	94.63	1.32	9.46	0.13	0.95	N/A	N/A	280	C4
24-8-0223 Sugar Bulk Loading		N/A	S 8.64	61.71	0.86	6.17	0.09	0.62	N/A	N/A	280	C4
24-8-0106 & 0115M Sugar Conveying System		N/A	S 6.90	49.30	0.69	4.93	0.07	0.49	N/A	N/A	280	C4
8-0225, 8-0115, 8-0296 Finish House Wheelabrators	Includes Modified 10X Fillers - Approved 4/2021	N/A	S 13.82	0.00	1.38	0.00	0.14	0.00	N/A	N/A	280	C4
Page 1 Sub-totals			S 1.89	108.90	1.89	108.85	1.50	15.15	4.56	45.14		
Page 2 Sub-totals			S 87.64	527.28	8.76	52.73	0.88	5.27	N/A	N/A		

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/dy) are lbs/operating day of the source

TOSD - Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section need to be completed only for VOC and NOx sources

Emissions Estimation Method:

- A1 - U.S. EPA Reference Method
- A2 - Other Particulate Sampling Train
- A3 - Liquid Absorption Technique
- A4 - Solid Adsorption Technique
- A5 - Freezing - Out Technique
- A9 - Other, Specify

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

- C1 - User calculated based on source test or other measurements
- C2 - User calculated based on material balance using engineering knowledge of the process
- C3 - User calculated based on AP-42
- C4 - User calculated by best guess/engineering judgement
- C5 - User calculated based on a State or local agency emission factor
- C6 - New construction, not operational
- C7 - Source closed, operation ceased
- C8 - Computer calculated based on standard

2021 EMISSIONS CERTIFICATION REPORT

FORM 3: PM

Page 3 of 6
Calendar Year: 2021

PARTICULATE MATTER

Company: American Sugar Refining, Inc.

Facility ID#: 510-00314

Pollutant: PM

Registration No./ Equip. Description	SCC Number	Fuel	PM - Filterable		PM10 - Filterable		PM2.5 - Filterable		PM Condensable		Operation Days/yr	Emissions Methods
			Tons/yr	Lbs/dy	Tons/yr	Lbs/dy	Tons/yr	Lbs/dy	Tons/yr	Lbs/dy		
24-8-0222 Sugar 2# 10X		N/A	S 4.77	34.10	0.48	3.41	0.05	0.34	N/A	N/A	280	C4
24-8-0296 Sugar 1# 10X	not included, indoor exhaust	N/A	S 0.29	2.10	0.03	0.21	0.00	0.02	N/A	N/A	280	C4
24-8-0225 Sugar XS System		N/A	S 4.77	34.10	0.48	3.41	0.05	0.34	N/A	N/A	280	C4
24-8-0265 Sugar Packing		N/A	S 11.49	82.10	1.15	8.21	0.11	0.82	N/A	N/A	280	C4
24-8-0286 Char Conveyor		N/A	S 0.00	0.00	0.00	0.00	0.00	0.00	N/A	N/A	0	C4
24-8-0293 Char Gravity Sep.		N/A	S 0.00	0.00	0.00	0.00	0.00	0.00	N/A	N/A	0	C4
24-8-0205 Char Kiln Fan		N/A	S 0.00	0.00	0.00	0.00	0.00	0.00	N/A	N/A	0	C4
24-8-0301 Lime Carb. System		N/A	S 0.69	4.90	0.07	0.49	0.01	0.05	N/A	N/A	280	C4
24-8-0287 Thiele Wheelabrator 7-5-2		N/A	S 4.03	28.80	0.40	2.88	0.04	0.29	N/A	N/A	280	C4
510-8-0332 Specialty Sugar		N/A	S 24.98	178.43	2.50	17.84	0.25	1.78	N/A	N/A	280	C4
New - Emergency Approval Fire Clean-Up of Raw Sugar		N/A	S 1.93	350.00	0.19	35.00	0.02	3.50	N/A	N/A	11	
Page 1 Sub-totals			1.89	108.90	1.89	108.85	1.50	15.15	4.56	45.14		
Page 2 Sub-totals			87.64	527.28	8.76	52.73	0.88	5.27	N/A	N/A		
Page 3 Sub-totals			52.96	714.53	5.30	71.45	0.53	7.15	N/A	N/A		

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/dy) are lbs/operating day of the source

TOSD - Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section need to be completed only for VOC and NOx sources

Emissions Estimation Method:

- A1 - U.S. EPA Reference Method
- A2 - Other Particulate Sampling Train
- A3 - Liquid Absorption Technique
- A4 - Solid Adsorption Technique
- A5 - Freezing - Out Technique
- A9 - Other, Specify

- C1 - User calculated based on source test or other measurements
- C2 - User calculated based on material balance using engineering knowledge of the process
- C3 - User calculated based on AP-42
- C4 - User calculated by best guess/engineering judgement

- C5 - User calculated based on a State or local agency emission factor
- C6 - New construction, not operational
- C7 - Source closed, operation ceased
- C8 - Computer calculated based on standard

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

2021 EMISSIONS CERTIFICATION REPORT

Page 4 of 6
Calendar Year: 2021PARTICULATE MATTER
Facility ID#: 510-00314 Pollutant: PM

Company: American Sugar Refining, Inc.

Registration No./ Equip. Description	SCC Number	Fuel	PM - Filterable		PM10 - Filterable		PM2.5 - Filterable		PM Condensable		Operation Days/yr	Emissions Methods
			Tons/yr	Lbs/dy	Tons/yr	Lbs/dy	Tons/yr	Lbs/dy	Tons/yr	Lbs/dy		
6-2019 Raw Sugar Unloading & Conveying		N/A	S 41.85	325.65	4.18	32.56	0.42	3.26	N/A	N/A	257	C4
			F									
6-2019 Raw Sugar Shed		N/A	S 11.96	85.40	1.20	8.54	0.12	0.85	N/A	N/A	280	C4
			F									
R-29-3 Melter Feed		N/A	S 23.91	170.80	2.39	17.08	0.24	1.71	N/A	N/A	280	C4
			F									
R-29-4 Diatomite Fugitives		N/A	S 0.19	1.33	0.02	0.13	0.00	0.01	N/A	N/A	280	C4
			F									
D3-5 Celite Fugitives		N/A	S								280	C4
			F 0.89	6.39	0.09	0.64	0.01	0.06	N/A	N/A		
8-0301 D2-1 Mud Loading		N/A	S								280	C4
			F 0.001	0.01	0.00	0.00	0.00	0.00	N/A	N/A		
8-0382 Scrap Melter 2		N/A	S 0.02	0.15	0.00	0.02	0.00	0.00	N/A	N/A	280	C4
			F									
8-0382 Remelt Screw Convey		N/A	S 0.13	0.92	0.01	0.09	0.00	0.01	N/A	N/A	280	C4
			F									
6-2022 Invert System		N/A	S 1.72	12.30	0.17	1.23	0.02	0.12	N/A	N/A	280	C4
			F									
New - 8/2021 Approval Conveyance - Shed & Barge		N/A	S								0	C4
			F 0.00	0.00	0.00	0.00	0.00	0.00	N/A	N/A		
Page 1 Sub-totals												
Page 2 Sub-totals												
Page 3 Sub-totals												
Page 4 Sub-totals												

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/dy) are lbs/operating day of the source

TOSD - Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section need to be completed only for VOC and NOx sources

Emissions Estimation Method:

- A1 - U.S. EPA Reference Method
- A2 - Other Particulate Sampling Train
- A3 - Liquid Absorption Technique
- A4 - Solid Adsorption Technique
- A5 - Freezing - Out Technique
- A9 - Other, Specify

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

- C5 - User calculated based on a State or local agency emission factor
- C6 - New construction, not operational
- C7 - Source closed, operation ceased
- C8 - Computer calculated based on standard

- C1 - User calculated based on source test or other measurements
- C2 - User calculated based on material balance using engineering knowledge of the process
- C3 - User calculated based on AP-42
- C4 - User calculated by best guess/engineering judgement

2021 EMISSIONS CERTIFICATION REPORT

FORM 3: PM

Page 5 of 6
Calendar Year: 2021

PARTICULATE MATTER

Facility ID#: 510-00314

Pollutant: PM

Company: American Sugar Refining, Inc.

Registration No./ Equip. Description	SCC Number	Fuel	PM - Filterable Tons/yr	PM - Filterable Lbs/dy	PM10 - Filterable Tons/yr	PM10 - Filterable Lbs/dy	PM2.5 - Filterable Tons/yr	PM2.5 - Filterable Lbs/dy	PM Condensible Tons/yr	PM Condensible Lbs/dy	Operation Days/yr	Emissions Methods
6-2022 Caustic Fugitives		N/A	S 0.01	0.06	0.00	0.01	0.00	0.00	N/A	N/A	280	C4
6-2020 Soft Sugar Shredder		N/A	S 0.01	0.09	0.00	0.01	0.00	0.00	N/A	N/A	280	C4
6-0209 Starch Receiver 1		N/A	S 0.78	5.55	0.08	0.56	0.01	0.06	N/A	N/A	280	C4
6-0209 Starch Receiver 2		N/A	S 0.78	5.55	0.08	0.56	0.01	0.06	N/A	N/A	280	C4
6-0125 Starch Receiver 3		N/A	S 1.44	10.29	0.14	1.03	0.01	0.10	N/A	N/A	280	C4
8-0209 Starch Bin		N/A	S 0.69	4.94	0.07	0.49	0.01	0.05	N/A	N/A	280	C4
8-0265 Packaging Feed Tank 1		N/A	S 0.02	0.11	0.00	0.01	0.00	0.00	N/A	N/A	280	C4
8-0265 Packaging Feed Tank 2		N/A	S 0.01	0.07	0.00	0.01	0.00	0.00	N/A	N/A	280	C4
8-0265 Packaging Feed Tank 3		N/A	S 0.00	0.01	0.00	0.00	0.00	0.00	N/A	N/A	280	C4
New - 2/2021 Approval Four Finished Sugar Silos		N/S	S 0.00	0.00	0.00	0.00	0.00	0.00	N/A	N/A	0	C4
Page 1 Sub-totals			1.89	108.90	1.89	108.85	1.50	15.15	4.56	45.14		
Page 2 Sub-totals			87.64	527.28	8.76	52.73	0.88	5.27	N/A	N/A		
Page 3 Sub-totals			52.96	714.53	5.30	71.45	0.53	7.15	N/A	N/A		
Page 4 Sub-totals			80.67	602.94	8.07	60.29	0.81	6.03	N/A	N/A		
Page 5 Sub-totals			3.73	26.67	0.37	2.67	0.04	0.27	N/A	N/A		

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/dy) are lbs/operating day of the source

TOSD - Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section need to be completed only for VOC and NOx sources

Emissions Estimation Method:

- A1 - U.S. EPA Reference Method
- A2 - Other Particulate Sampling Train
- A3 - Liquid Adsorption Technique
- A4 - Solid Adsorption Technique
- A5 - Freezing - Our Technique
- A9 - Other, Specify

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

- C1 - User calculated based on source test or other measurements
- C2 - User calculated based on material balance using engineering knowledge of the process
- C3 - User calculated based on AP-42
- C4 - User calculated by best guess/engineering judgement
- C5 - User calculated based on a State or local agency emission factor
- C6 - New construction, not operational
- C7 - Source closed, operation ceased
- C8 - Computer calculated based on standard

2021 EMISSIONS CERTIFICATION REPORT

FORM 3: PM

Page 6 of 6
Calendar Year: 2021

PARTICULATE MATTER
Pollutant: PM

Facility ID#: 510-00314

Company: American Sugar Refining, Inc.

Registration No./ Equip. Description	SCC Number	Fuel	PM - Filterable		PM10 - Filterable		PM2.5 - Filterable		PM Condensable		Operation Days/yr	Emissions Methods
			Tons/yr	Lbs/dy	Tons/yr	Lbs/dy	Tons/yr	Lbs/dy	Tons/yr	Lbs/dy		
8-0265 Carton/Bag/Package		N/A	S 4.77	34.10	0.48	3.41	0.05	0.34	N/A	N/A	280	C4
8-0265 Wheelabrator 7-5-1		N/A	S 4.61	32.91	0.46	3.29	0.05	0.33	N/A	N/A	280	C4
8-0212 Bin Tower Rejects Box		N/A	S 0.004	0.03	0.00	0.00	0.00	0.00	N/A	N/A	280	C4
8-0266 Malodex Supersack Unloading		N/A	S 0.02	0.14	0.00	0.01	0.00	0.00	N/A	N/A	280	C4
S-7-13 Remelt Shredder Fug.		N/A	S 0.06	0.43	0.01	0.04	0.00	0.00	N/A	N/A	280	C4
8-0223 Magnet Tailings Fug.		N/A	S 0.0002	0.002	0.00	0.00	0.00	0.00	N/A	N/A	280	C4
8-0383 Cooling Tower CT-3		N/A	S 0.02	0.10	0.00	0.01	0.00	0.00	N/A	N/A	365	C4
Maintenance Welding New - 6/2020 Approval		N/A	S 0.07	0.40	0.01	0.04	0.00	0.00	N/A	N/A	280	C4
Powdered Sugar Bulk Tote		N/A	S 0.13	4.32	0.01	0.43	0.00	0.04	N/A	N/A	280	C4
Page 1 Sub-totals			1.89	108.90	1.89	108.85	1.50	15.15	4.56	45.14		
Page 2 Sub-totals			87.64	527.28	8.76	52.73	0.88	5.27	N/A	N/A		
Page 3 Sub-totals			52.96	714.53	5.30	71.45	0.53	7.15	N/A	N/A		
Page 4 Sub-totals			80.67	602.94	8.07	60.29	0.81	6.03	N/A	N/A		
Page 5 Sub-totals			3.73	26.67	0.37	2.67	0.04	0.27	N/A	N/A		
Page 6 Sub-totals			9.69	72.43	0.97	7.24	0.10	0.72	N/A	N/A		
Total			236.58	2052.74	25.36	303.24	3.85	34.59	4.56	45.14		

S - Stack Emissions F - Fugitive Emissions Daily emissions (lbs/dy) are lbs/operating day of the source
TOSD - Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section need to be completed only for VOC and NOx sources
Emissions Estimation Method:

- A1 - U.S. EPA Reference Method
- A2 - Other Particulate Sampling Train
- A3 - Liquid Absorption Technique
- A4 - Solid Adsorption Technique
- A5 - Freezing - Out Technique
- A9 - Other, Specify
- C1 - User calculated based on source test or other measurements
- C2 - User calculated based on material balance using engineering knowledge of the process
- C3 - User calculated based on AP-42
- C4 - User calculated by best guess/engineering judgement
- C5 - User calculated based on a State or local agency emission factor
- C6 - New construction, not operational
- C7 - Source closed, operation ceased
- C8 - Computer calculated based on standard

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

FORM 4:

2021 EMISSIONS CERTIFICATION REPORT

Company: American Sugar Refining, Inc.Facility ID#: 510-00314Pollutant: Formaldehyde

Calendar Year: 2021

Registration No./ Equip. Description	Actual Emissions			Control Device**	% Efficiency
	Tons/yr	Lbs/day	Lbs/hr		
5-1444 C1 - Boiler #1	0.01	0.10	0.004	N/A	
5-1445 C2 - Boiler #2	0.00545	0.10	0.004	N/A	
5-1446 C3 - Boiler #3	0.01	0.11	0.005	N/A	
5-1447 C4 - Boiler #4	0.007	0.09	0.004	N/A	
5-1476 C6 - Boiler #6	0.03	0.11	0.004	N/A	
8-0205 Char Kilns	0.000	0.00	0.000	N/A	
8-0301 Carbonation	0.01	0.06	0.002	N/A	
9-1293 250 KW Emerg Generator	0.0863175	21.138970	0.8807904	N/A	
TOTALS	0.16	21.70	0.90		

* Please attach all calculations.

* See Attachment 1 for the minimum reporting values.

** Control Device:

S = Scrubber

B = Baghouse

ESP = Electrostatic Precipitator

A = Afterburner

C = Condenser

AD = Adsorption

O = Other

2021 EMISSIONS CERTIFICATION REPORT

FORM 5:

BILLABLE TOXIC AIR POLLUTANTS

Calendar Year: 2021

Company: American Sugar Refining, Inc.

Facility ID#: 510-00314

Chemical Name	CAS Number	Actual Emissions		Estimation Method
		Tons/yr	lbs/dy	
Carbon Disulfide	75-15-0	S	N/A	
		F		
Carbonyl Sulfide	463-58-1	S	N/A	
		F		
Chlorine	7782-50-5	S	N/A	
		F		
Cyanide Compounds	57-12-5	S	N/A	
		F		
Hydrochloric Acid	7647-01-0	S	2.72E-05	0.011338
		F	4.94E-03	
Hydrogen Fluoride	7664-39-3	S	N/A	
		F		
Methyl Chloroform	71-55-6	S	N/A	
		F		
Methylene Chloride	75-09-2	S	N/A	
		F		
Perchloroethylene	127-18-4	S	N/A	
		F		
Phosphine	7803-51-2	S	N/A	
		F		
Titanium Tetrachloride	7550-45-0	S	N/A	
		F		
TOTALS		0.005	0.038	

- Emission Estimation Method
- A1- U.S. EPA Reference Method
A2- Other Particulate Sampling Train
A3- Liquid Adsorption Technique
A4- Solid Adsorption Technique
A5 - Freezing Out Technique
A9 - Other, Specify
- C1 - User calculated based on source test or other measurement
C2 - User calculated based on material balance using engineering knowledge of the process
C3 - User calculated based on AP 42
C4 - User calculated by best guess / engineering judgement
C5 - User calculated based on a State or local agency factor
C6 - New Construction, not operational
C7 - Source closed, operation ceased
C8 - Computer calculated based on standard

Daily emissions (lbs/day) are lbs/operating day of the source.

F - Fugitive Emissions

S - Stack Emissions

FORM 6: Greenhouse Gases

Page 1 of 3

Calendar Year: 2021

Facility ID#: 510-00314

Company: American Sugar Refining, Inc.

Pollutant: Carbon Dioxide

This form must be used to report
Greenhouse gas emissions:

Carbon dioxide (CO ₂)	
Methane (CH ₄)	
Nitrous Oxide (N ₂ O)	
* Hydrofluorocarbons (HFCs)	
* Perfluorocarbons (PFCs)	
* Sulfur Hexafluoride (SF ₆)	

Use a separate form for each pollutant.

Please attach all calculations.

Emissions must be broken down by
equipment registration number.

* Facility does not emit these pollutants.

FORM 6: Greenhouse Gases

2021 EMISSIONS CERTIFICATION REPORT

GREENHOUSE GAS AIR POLLUTANTS

Company: American Sugar Refining, Inc.

Facility ID#: 510-00314

Pollutant: Methane

Registration No./ Equip. Description	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
5-1444 C1 - Boiler #1	0.4128	3.08	0.128
5-1445 C2 - Boiler #2	0.1586	2.91	0.121
5-1446 C3 - Boiler #3	0.1971	3.10	0.129
5-1447 C4 - Boiler #4	0.1964	2.45	0.102
5-1476 C6 - Boiler #6	0.8190	6.42	0.268
8-0205 Char Kilns	0.000	0.00	0.000
8-0301 Carbonation	0.247	1.76	0.073
*** None Insignificant Sources	0.030	0.35	0.015
9-1293 250 KW Emerg Generator	0.000	0.00	0.00
TOTALS	2.061	20.085	0.837

This form must be used to report
Greenhouse gas emissions:

Carbon dioxide (CO2)

Methane (CH4)

Nitrous Oxide (N2O)

* Hydrofluorocarbons (HFCs)

* Perfluorocarbons (PFCs)

* Sulfur Hexafluoride (SF6)

Use a separate form for each pollutant.

Please attach all calculations.

Emissions must be broken down by
equipment registration number.

* Facility does not emit these pollutants.

FORM 6: Greenhouse Gases

2021 EMISSIONS CERTIFICATION REPORT

Company: American Sugar Refining, Inc.

Facility ID#: 510-00314

GREENHOUSE GAS AIR POLLUTANTS

Pollutant: Nitrous Oxide

Registration No./ Equip. Description	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hr
5-1444 (Nat Gas)	0.0413	0.31	0.013
C1 - Boiler #1 (Oil)			
5-1445 (Nat Gas)	0.0163	0.30	0.012
C2 - Boiler #2 (Oil)			
5-1446 (Nat Gas)	0.0197	0.31	0.013
C3 - Boiler #3 (Oil)			
5-1447 (Nat Gas)	0.0200	0.25	0.010
C4 - Boiler #4 (Oil)			
5-1476	0.0819	0.64	0.027
C6 - Boiler #6			
8-0205	0.000	0.00	0.000
Char Kilns			
8-0301	0.025	0.18	0.007
Carbonation			
*** None	0.030	0.33	0.01
Insignificant Sources			
9-1293	0.000	0.00	0.00
250 KW Emerg Generator			
TOTALS	0.234	2.324	0.097

This form must be used to report Greenhouse gas emissions:

Carbon dioxide (CO2)

Methane (CH4)

Nitrous Oxide (N2O)

* Hydrofluorocarbons (HFCs)

* Perfluorocarbons (PFCs)

* Sulfur Hexafluoride (SF6)

Use a separate form for each pollutant.

Please attach all calculations.

Emissions must be broken down by equipment registration number.

* Facility does not emit these pollutants.

EMISSION SUMMARY REPORTCompany: American Sugar Refining, Inc.Facility ID#: 510-00314Calendar Year: 2021

Pollutant	Actual Emissions		
	Tons/yr	lbs/day	
Nitrous Oxide	0.23	2.32	*Greenhouse Gas (GHG)
PM Condensables	4.56	45.14	
Methane	2.06	20.09	*Greenhouse Gas (GHG)
VOC (Volatile Organic Compounds)	9.37	179.48	
PM10 (Particulate Matter - Filterable)	25.36	303.24	
PT (Particulate Matter)	236.58	2,052.74	
Carbon Dioxide	109,074.85	1,110,137.17	*Greenhouse Gas (GHG)
Nitrogen Oxides	46.26	1,766.23	
PM2.5 (particulate Matter - Filterable)	3.85	34.59	
Sulfur Oxides (SOx)	0.90	93.40	
CO (Carbon Monoxide)	76.17	1,014.47	
Billable Criteria Emissions (tpy)	86.45		
Billable HAP	4.97E-03		
Total HAP Emissions	4.97E-03		
Total GHG Emissions	109,077.15		

*Billable Criteria Emissions include:

Sulfur Oxides (SOx)
 Nitrogen Oxides
 VOC (Volatile Organic Compounds)
 PM10 (Particulate Matter - Filterable)
 PM Condensable

Toxic Air Pollutants (HAPs)

Hydrochloric Acid (Gas emission - IX)

No. 4 Fuel Oil					GCV:	NA	BTU/Gal
	Boiler 1	Boiler 2	Boiler 3	Boiler 4		NA	MMBTU/Gal
Jan	NA	NA	NA	NA			
Feb	NA	NA	NA	NA			
Mar	NA	NA	NA	NA			
April	NA	NA	NA	NA			No. 4 Fuel Oil is no longer used at ASR.
May	NA	NA	NA	NA			
June	NA	NA	NA	NA			
July	NA	NA	NA	NA			
Aug	NA	NA	NA	NA			
Sep	NA	NA	NA	NA			
Oct	NA	NA	NA	NA			
Nov	NA	NA	NA	NA			
Dec	NA	NA	NA	NA			
Total	NA	NA	NA	NA	total		0
No. 2 Fuel Oil					GCV:	139,808	BTU/Gal
	Boiler 1	Boiler 2	Boiler 3	Boiler 4		0.1398	MMBTU/Gal
Jan	0	0	0	0			
Feb	0	0	0	0			
Mar	0	13,279	0	9,704			
April	0	0	0	0			
May	0	0	0	0			
June	0	0	0	0			
July	0	0	0	0			
Aug	0	0	0	0			
Sep	0	0	0	0			
Oct	111	203	0	1,121			
Nov	3,741	10,371	9,976	3,478			
Dec	14,222	0	12,291	0			
Total	18,074	23,853	22,267	14,303	total		78,497

Boiler 1 - Natural Gas Use per Day	January	February	March	April	May	June	July	August	September	October	November	December
1	0	458,576	1,095,856	0	1,652,973	832,809	1,797,992	0	2,136,424	2,043,890	1,798,256	0
2	0	0	0	0	1,521,137	1,967,933	1,811,507	1,353,349	2,028,598	431,294	2,199,509	0
3	286,704	0	1,195,052	0	711,523	1,966,820	1,016,164	1,619,610	2,188,092	303,465	2,258,496	0
4	1,038,652	0	1,846,452	488,588	1,190,008	1,747,364	0	1,562,539	2,74,558	1,939,271	2,261,242	0
5	1,277,593	0	2,052,755	2,088,071	1,595,798	1,679,447	438,025	1,528,878	480,804	2,248,165	2,263,571	0
6	1,023,953	0	1,846,452	2,278,079	2,185,297	1,686,190	534,748	1,557,331	1,904,335	1,921,015	2,284,705	889,553
7	1,089,844	0	404,051	2,267,893	2,180,754	1,753,835	0	1,868,775	1,904,335	2,312,015	2,356,194	1,740,404
8	1,125,967	764,935	2,173,996	2,041,301	221,682	1,500,387	0	1,609,549	2,428,485	398,259	2,332,172	1,437,536
9	1,888,174	1,888,342	2,148,505	1,949,851	1,659,006	1,546,890	0	1,716,755	2,456,158	0	2,273,850	1,437,536
10	1,935,615	2,028,893	2,229,449	1,108,688	1,525,701	720,322	0	1,535,780	2,426,979	0	2,299,121	1,274,019
11	1,090,419	1,989,653	1,899,407	410,482	2,450,019	0	154,816	1,518,959	2,405,939	0	2,289,206	0
12	1,078,045	2,061,418	1,934,423	2,048,294	2,482,666	0	154,816	0	2,208,424	0	2,245,029	0
13	1,163,374	1,577,604	805,366	2,140,206	2,105,337	461,608	0	0	2,152,943	0	729,575	0
14	1,836,622	1,738,659	314,183	2,009,539	2,094,727	1,791,256	0	0	2,416,656	0	1,73,477	0
15	1,933,564	1,634,346	1,663,514	2,160,690	435,307	1,565,958	0	0	2,426,456	0	1,319,195	23,795
16	552,612	1,864,539	1,976,725	2,271,829	0	1,694,015	0	0	2,378,917	0	1,714,709	0
17	0	2,272,320	1,897,214	861,819	0	1,685,076	0	0	2,122,772	14,940	2,278,514	0
18	202,240	2,228,673	1,955,183	437,869	0	1,776,055	0	0	459,947	1,896,249	2,293,327	0
19	435,079	2,144,997	1,988,676	1,805,343	0	1,169,889	100,892	0	366,380	2,291,637	2,335,347	456,890
20	0	1,313,104	496,740	1,137,797	35,089	370,163	357,968	0	2,078,577	2,282,497	1,552,883	1,561,356
21	0	37,986	63,574	422,377	1,393,218	1,767,511	0	0	2,261,642	2,354,802	100,479	1,377,655
22	0	328,926	1,056,728	1,210,661	424,573	1,759,079	147,364	0	2,374,598	2,326,617	0	1,311,828
23	1,418,154	0	0	622,865	472,130	1,603,470	0	0	2,335,921	2,349,693	0	1,513,217
24	617,222	803,807	0	0	1,998,209	1,624,952	0	0	2,331,698	2,563,716	0	0
25	1,850,076	1,931,463	1,310,231	761,891	2,332,803	1,750,432	0	1,529,676	2,321,613	2,569,110	0	0
26	2,181,863	2,160,924	2,179,878	1,919,834	2,361,172	1,504,488	0	2,234,226	2,295,540	2,254,916	0	0
27	2,083,339	578,403	2,021,965	1,979,740	2,281,676	2,233,152	0	2,180,852	2,316,336	2,308,454	0	14,058
28	910,494	103,259	340,606	1,504,549	2,115,629	1,687,143	0	2,106,903	2,330,537	2,318,366	0	1,293,342
29	532,031	0	2,061,932	2,029,982	0	1,642,859	0	2,161,040	2,324,104	2,185,092	1,872,209	1,572,738
30	1,987,041	0	614,224	2,076,066	0	1,520,331	0	1,903,344	2,295,538	181,306	1,901,023	1,318,626
31	1,411,091	0	53,232	0	0	0	0	2,189,466	0	630,139	0	94,9252

Days Boiler Run on NG	25	21	28	26	24	28	9	17	29	23	23	15
Monthly Total (scf)	31,069,768	29,930,827	38,984,497	40,034,304	36,314,313	43,121,752	6,359,476	30,196,832	58,514,971	39,725,416	43,112,089	17,555,571
Daily Maximum (scf)	2,181,863	2,272,320	2,229,449	2,278,079	2,482,666	2,233,152	1,811,507	2,234,226	2,436,158	2,369,110	2,356,194	1,740,404
Annual total (scf)	414,919,821											
Daily Maximum (scf)	2,482,666											
TOSD Maximum (scf)	2,482,666											
Total Days Boiler Run on NG	268											

12-May

Boiler 2 - Natural Gas Use per Day												
	January	February	March	April	May	June	July	August	September	October	November	December
1	0	0	0	0	1,568,682	0	0	461,388	0	0	1,935,892	1,374,343
2	0	0	0	0	1,468,796	0	0	655,499	0	0	2,147,507	1,629,973
3	0	0	0	0	721,869	0	0	0	0	0	2,186,840	1,776,718
4	0	0	0	0	1,167,009	0	0	0	0	0	2,194,412	1,624,631
5	0	0	32,417	146,046	1,495,185	0	0	38,995	0	0	2,193,032	1,673,861
6	0	0	320,924	0	1,812,126	0	0	0	0	0	2,207,849	1,445,510
7	0	32,551	0	0	1,435,352	0	0	0	254,955	0	2,276,017	1,678,419
8	0	0	0	0	0	0	0	0	2,303,934	0	2,262,199	1,518,650
9	0	0	0	0	0	0	0	0	2,317,596	0	2,211,498	1,391,676
10	0	39,083	0	0	0	0	0	0	2,311,311	0	2,237,218	1,351,579
11	0	0	0	0	1,388,262	0	0	49,138	2,272,790	0	2,227,182	529,291
12	0	0	0	0	1,353,655	0	0	1,526,599	2,066,862	0	2,190,434	601,365
13	0	0	0	0	0	0	0	915,942	1,994,322	0	1,259,345	1,280,640
14	0	0	0	0	0	0	0	0	1,363,578	0	476,783	1,634,339
15	0	0	0	0	0	0	0	0	0	0	1,348,156	1,556,339
16	0	0	0	0	0	0	0	195,622	0	0	855,865	0
17	0	0	0	0	0	0	0	32,909	0	0	2,204,444	0
18	0	0	0	0	0	0	0	944,418	0	1,704,639	2,218,632	0
19	0	0	0	0	0	0	0	865,122	0	2,247,036	2,263,320	0
20	0	0	0	0	0	0	0	0	245,384	2,349,436	1,768,561	0
21	0	0	0	0	0	0	0	0	2,163,708	2,349,927	929,785	0
22	0	0	0	0	83,782	0	0	0	1,348,120	2,350,820	1,028,875	0
23	0	0	0	0	40,132	0	0	0	0	2,335,487	1,229,607	0
24	0	0	0	0	1,994,072	0	0	0	0	2,288,015	1,569,234	0
25	0	29,334	773,561	0	2,311,427	0	0	0	0	2,236,843	321,245	0
26	0	0	1,882,101	0	2,260,135	0	0	0	0	2,126,326	0	0
27	0	0	1,793,614	0	2,182,542	0	0	0	0	2,219,912	0	0
28	0	0	524,530	0	787,691	0	752,355	0	0	2,257,897	0	0
29	0	0	1,800,816	0	0	0	1,470,337	0	0	2,168,356	1,693,242	0
30	0		95,627	696,760	0	0	1,462,411	0	0	417,382	2,041,578	0
31	0		0		0		0	0		818,161		0

Days Boiler Run on NG	0	3	8	2	16	0	3	10	11	14	27	15
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Monthly Total (scf)	-	100,968	7,223,590	842,806	22,070,717	-	3,685,103	5,685,632	18,642,560	27,870,237	47,478,752	21,067,334
Daily Maximum (scf)	-	39,083	1,882,101	696,760	2,311,427	-	1,470,337	1,526,599	2,317,596	2,350,820	2,276,017	1,776,718

Annual total (scf)	154,667,699
Daily Maximum (scf)	2,350,820
TOSD Maximum (scf)	2,317,596
Total Days Boiler Run on NG	109

9-Sep

Boiler 3 - Natural Gas Use per Day												
	January	February	March	April	May	June	July	August	September	October	November	December
1	0	0	0	0	0	0	0	0	0	2,037,050	1,955,734	1,421,031
2	0	0	0	0	0	0	0	93,234	0	349,532	2,234,732	1,529,803
3	0	0	0	0	0	0	0	0	0	252,311	2,276,343	1,728,632
4	0	0	0	0	0	0	0	0	0	1,695,920	2,281,745	1,669,728
5	0	0	0	0	0	0	0	0	0	1,958,199	2,282,596	1,624,944
6	0	0	0	0	0	0	0	0	0	1,971,059	2,302,307	631,859
7	0	0	0	0	0	0	49,209	0	288,554	1,925,762	2,369,296	0
8	0	0	0	0	0	0	0	0	2,286,315	642,775	2,342,242	0
9	0	0	0	0	0	0	65,513	0	2,410,476	1,617,512	2,291,043	0
10	0	0	0	0	0	0	0	0	2,318,190	1,722,551	2,315,655	0
11	0	0	0	0	0	0	0	0	2,239,144	2,203,018	2,304,739	0
12	0	0	0	0	0	0	0	0	1,924,089	2,505,493	2,260,524	13,618
13	0	0	0	0	0	0	0	556,747	1,873,436	2,505,182	77,276	1,173,789
14	0	0	0	0	0	0	580,095	599,399	2,295,080	2,517,995	1,302,853	1,631,230
15	0	0	0	0	0	0	0	422,821	2,293,653	2,379,830	1,176,032	0
16	0	0	0	0	0	0	135,681	2,172,824	2,332,711	55,131	949,930	376,357
17	0	0	0	0	0	0	0	2,373,855	2,064,450	414,852	2,288,793	1,284,203
18	0	0	0	0	0	0	268,738	1,665,180	152,310	1,942,089	2,302,959	1,572,180
19	0	0	0	0	0	0	1,273,985	2,079,841	2,060,458	2,283,227	2,347,895	334,655
20	0	0	0	0	0	0	1,327,368	358,754	2,352,937	2,352,937	1,214,128	0
21	0	0	0	0	0	0	1,493,184	509,802	2,369,292	2,328,112	1,036,165	0
22	0	0	0	0	0	108,456	1,265,953	1,987,620	2,343,761	2,351,303	1,227,164	0
23	0	0	0	0	0	70,855	0	2,185,268	2,341,566	2,364,284	1,381,394	0
24	0	0	0	0	0	0	0	805,540	2,325,507	2,356,284	84,306	0
25	0	0	0	0	0	0	0	0	2,293,841	2,246,075	0	0
26	0	0	0	0	0	0	0	0	2,315,368	2,304,737	0	566,834
27	0	0	0	0	0	49,979	0	0	2,331,177	2,318,573	935,160	1,243,060
28	0	0	0	0	0	0	0	0	1,903,622	1,903,622	2,094,817	1,513,682
29	0	1,957,157	0	0	0	0	0	269,104	2,295,201	0	2,113,617	1,074,062
30	0	0	0	0	0	0	0	0	0	469,743	0	0
31	0	0	0	0	0	0	0	0	0	0	0	0

Days Boiler Run on NG	0	1	0	0	0	3	9	15	24	30	27	18
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Monthly Total (scf)	0	1,957,157	0	0	0	229,290	6,459,726	18,302,620	47,781,884	54,264,832	48,579,292	20,565,699
Daily Maximum (scf)	0	1,957,157	0	0	0	108,456	1,493,184	2,373,855	2,410,476	2,517,995	2,369,296	1,728,632

Annual total (scf)	198,140,500
Daily Maximum (scf)	2,517,995
TOSD Maximum (scf)	2,410,476
Total Days Boiler Run on NG	127

9-Sep

Boiler 4 - Natural Gas Use per Day													January	February	March	April	May	June	July	August	September	October	November	December
1													0	1,645,211	996,264	2,081,681	0	0	0	0	1,489,169	392,979	0	
2													0	2,209,373	2,073,664	432,062	0	903,235	0	0	0	66,608	0	
3													175,939	2,095,445	882,565	0	0	0	0	0	23,748	0	0	
4													1,073,167	1,987,285	0	0	0	0	0	0	1,857,412	0	0	
5													1,294,065	1,770,838	0	589,782	0	0	0	0	2,284,454	0	0	
6													1,038,194	1,364,376	0	1,881,200	0	1,092,579	0	0	2,303,303	0	0	
7													1,104,556	352,931	0	2,123,243	0	1,524,856	0	0	2,299,260	0	0	
8													1,069,545	1,270,642	0	245,353	0	1,542,217	0	0	2,042,636	0	0	
9													65,804	0	0	0	0	1,496,847	0	0	1,642,306	0	0	
10													137,788	0	0	0	1,141,515	1,582,737	0	144,960	1,775,164	0	0	
11													1,105,134	0	0	0	1,581,350	1,902,144	0	141,799	736,084	0	0	
12													1,092,767	26,673	0	0	1,714,473	1,580,006	0	723,618	0	0	0	
13													1,016,587	578,049	1,394,298	0	0	1,554,206	0	936,734	0	0	0	
14													292,200	0	53,996	0	0	1,069,457	0	1,034,169	0	0	0	
15													482,736	147,245	0	0	0	1,423,232	0	2,279,840	0	604,472	0	
16													431,658	311,202	0	57,826	448,773	0	1,169,352	0	2,292,576	0	495,005	
17													0	0	0	775,496	1,585,038	0	1,022,468	0	1,457,237	0	1,283,260	
18													1,537,327	0	0	0	1,709,490	0	155,662	0	0	0	1,592,254	
19													1,648,314	0	23,840	0	1,626,169	0	141,244	0	0	0	1,566,674	
20													1,997,407	1,112,546	809,230	0	1,511,106	0	0	0	1,606,526	0	1,453,227	
21													2,091,682	1,775,002	447,100	344,862	779,404	0	0	0	442,801	0	40,028	
22													2,149,813	1,681,015	1,081,254	1,271,212	275,018	0	139,542	0	1,006,939	0	1,197,754	
23													1,255,913	1,963,446	2,061,605	1,475,157	46,334	0	1,451,343	0	2,304,449	0	658,583	
24													96,642	1,045,942	1,829,506	1,887,721	1,985,957	0	1,713,140	0	2,300,760	0	0	
25													377,706	0	1,829,165	942,485	2,307,391	0	1,965,514	0	2,279,561	0	0	
26													0	0	1,915,252	15,212	2,273,889	0	1,765,750	0	2,280,412	0	0	
27													0	803,319	1,085,257	0	2,205,494	0	1,624,886	0	2,283,965	0	186,199	
28													1,377,629	347,168	66,529	0	1,050,045	0	1,424,886	0	2,279,110	0	197,882	
29													1,708,414	0	1,860,837	0	0	1,042,533	0	2,301,746	0	0	0	
30													0	0	1,707,899	0	0	0	0	2,285,192	0	0	0	
31													137,007	0	571,093	0	0	0	0	0	0	0	0	
Days Boiler Run on NG													25	19	18	11	18	4	21	0	19	10	5	10
Monthly Total (scf)													24,757,994	22,487,708	20,689,374	9,873,496	25,349,727	4,857,992	26,759,715	0	30,382,394	16,453,536	1,599,092	10,021,991
Daily Maximum (scf)													2,149,813	2,209,373	2,073,664	2,081,681	2,307,391	1,863,510	1,965,514	0	2,304,449	2,303,303	604,472	1,592,254
Daily Maximum (scf)													2,307,391											
TOSD Maximum (scf)													2,307,391											

25-May

Boiler 6 - Natural Gas Use per Day												
	January	February	March	April	May	June	July	August	September	October	November	December
1	0	3,523,542	3,820,616	3,931,121	3,642,717	0	4,488,162	44,439	3,860,056	0	0	3,306,013
2	0	4,783,217	4,801,704	0	3,929,590	2,370,864	4,275,344	3,818,869	3,889,436	0	0	3,252,130
3	26,211	4,871,847	4,847,396	0	3,945,568	4,680,048	84,383	4,785,422	2,754,497	0	0	3,212,138
4	3,292,427	4,837,824	4,694,585	0	3,979,263	4,695,673	0	4,713,884	0	76,736	0	3,031,906
5	4,281,709	4,352,245	4,654,546	2,972,825	3,895,390	4,083,134	41,793	4,629,448	0	0	0	3,256,091
6	4,445,968	657,301	406,759	4,870,204	1,103,605	4,098,382	3,838,357	4,640,888	94,212	649,294	0	3,298,078
7	4,274,462	0	24,336	4,873,333	0	4,242,663	4,660,722	4,512,123	3,130,099	0	0	3,291,516
8	3,383,985	3,442,641	3,677,575	4,760,990	0	4,631,326	4,848,184	2,895,672	0	3,187,265	0	3,244,261
9	0	4,251,214	4,973,270	4,750,555	22,574	4,658,684	4,568,287	3,892,591	0	2,882,561	0	3,237,595
10	12,658	4,384,310	5,106,795	644,107	3,337,845	3,742,343	4,266,582	4,495,644	0	3,017,044	0	2,758,769
11	3,385,519	4,658,961	5,000,466	71,097	1,517,462	4,345,359	570,785	4,529,639	0	3,430,477	0	0
12	4,464,470	4,651,691	4,869,008	4,262,708	1,446,997	27,137	4,390,084	4,731,171	0	3,647,444	0	32,795
13	4,543,674	852,772	584,387	5,052,256	4,218,805	47,095	4,625,898	3,161,631	0	3,653,094	0	2,812,787
14	4,767,407	0	273,896	5,040,351	3,539,816	3,748,538	4,223,734	0	0	3,592,001	0	3,425,234
15	3,348,337	37,165	4,213,707	5,057,665	0	4,486,932	4,133,808	180,330	0	2,630,871	0	3,465,082
16	0	3,537,158	4,771,517	4,803,771	29,280	4,780,405	4,254,842	3,583,694	0	0	0	3,232,816
17	0	4,823,046	4,884,326	216,801	3,919,438	4,478,022	83,722	4,565,189	0	106,243	0	3,270,473
18	31,245	4,893,253	4,972,491	63,197	4,588,953	4,251,537	105,021	3,737,825	0	51,057	51,057	2,978,422
19	3,237,473	4,778,539	4,707,060	4,154,262	4,635,005	152,732	3,834,101	3,982,710	0	87,824	87,824	1,252,921
20	4,693,130	1,941,395	451,570	3,060,238	4,464,188	44,412	4,530,779	3,206,745	0	0	1,544,094	3,232,658
21	4,594,776	0	0	0	791,120	3,131,502	4,564,106	0	0	0	3,659,228	3,298,835
22	4,660,700	3,545,734	4,041,195	0	0	4,650,312	4,739,890	21,884	0	0	3,498,138	3,228,160
23	1,574,413	4,728,623	4,728,252	0	0	4,778,423	4,623,576	3,360,683	0	0	3,297,822	1,475,804
24	0	4,765,400	4,870,192	0	0	4,799,069	4,321,303	4,303,518	0	0	2,314,558	0
25	3,523,403	4,621,506	2,559,126	0	0	4,723,804	1,539,597	4,244,794	0	0	0	0
26	4,730,991	4,472,024	0	22,482	0	4,311,739	3,812,960	4,058,677	0	0	0	0
27	4,925,988	397,950	0	0	0	654,279	4,756,786	4,027,375	0	0	0	0
28	4,966,979	23,901	0	1,621,478	0	3,852,142	4,620,270	3,820,019	0	0	83,541	2,501,521
29	3,437,284	0	40,028	3,563,299	0	4,739,875	4,874,895	3,816,679	0	0	231,505	3,112,880
30	0	0	4,432,462	3,365,050	0	4,623,395	1,917,608	3,849,904	0	0	860,937	1,187,589
31	23,745	0	4,175,253	0	0	0	0	3,931,337	0	0	0	0
Days Boiler Run on NG												
	24	25	27	21	18	29	29	29	5	13	10	25
Monthly Total (scf)	80,626,954	88,033,259	96,582,718	67,157,790	53,007,416	103,809,926	101,795,579	105,543,184	13,728,300	27,017,541	15,628,504	70,344,474
Daily Maximum (scf)	4,966,979	4,893,253	5,106,795	5,057,665	4,635,005	4,799,069	4,874,895	4,785,422	3,889,436	3,653,094	3,659,228	3,463,082
Annual total (scf)	823,275,645											
Daily Maximum (scf)	5,106,795											
TOSD Maximum (scf)	4,874,895											
Total Days Boiler Run on NG	255											

29-Jul

[illegible]

Misc Insignificant Sources - NG Usage	January	February	March	April	May	June	July	August	September	October	November	December
1	100,000	331,000	215,000	0	0	0	0	0	0	0	0	178,000
2	70,000	261,000	250,000	0	1,000	0	0	0	0	0	66,000	168,000
3	249,000	304,000	292,000	0	0	0	0	0	0	0	71,000	104,000
4	151,000	279,000	243,000	0	0	0	0	0	0	0	74,000	1,000
5	148,000	277,000	242,000	1,000	0	1,000	0	0	0	0	70,000	2,000
6	156,000	285,000	248,000	0	0	0	0	0	0	0	73,000	1,000
7	142,000	239,000	238,000	0	0	0	0	0	0	0	65,000	1,000
8	142,000	286,000	233,000	0	0	0	0	0	0	0	50,000	1,000
9	167,000	244,000	225,000	1,000	0	0	0	0	0	1,000	37,000	1,000
10	154,000	239,000	225,000	0	0	0	0	0	0	0	53,000	2,000
11	187,000	315,000	164,000	0	0	0	0	0	0	0	46,000	0
12	204,000	418,000	134,000	0	0	0	0	0	0	0	47,000	0
13	200,000	290,000	95,000	0	0	0	0	0	1,000	0	64,000	0
14	224,000	324,000	128,000	0	0	0	0	0	0	0	78,000	1,000
15	244,000	378,000	148,000	0	0	0	0	0	0	0	122,000	1,000
16	187,000	305,000	225,000	0	0	0	0	0	0	0	163,000	0
17	0	255,000	230,000	1,000	0	0	0	0	0	0	162,000	0
18	415,000	325,000	284,000	0	0	0	0	0	0	0	115,000	0
19	200,000	269,000	170,000	0	0	0	0	0	0	0	153,000	0
20	174,000	262,000	291,000	1,000	0	4,000	0	0	0	1,000	155,000	82,000
21	255,000	267,000	215,000	1,000	0	2,000	1,000	0	0	0	142,000	211,000
22	185,000	245,000	212,000	0	0	1,000	0	0	0	1,000	112,000	207,000
23	193,000	235,000	206,000	1,000	0	0	0	0	1,000	0	158,000	226,000
24	203,000	194,000	118,000	0	0	0	0	0	0	0	175,000	165,000
25	197,000	223,000	96,000	1,000	0	1,000	6,000	0	1,000	0	151,000	187,000
26	177,000	260,000	80,000	0	1,000	0	0	0	0	0	174,000	181,000
27	170,000	226,000	1,000	0	0	0	0	0	0	1,000	175,000	208,000
28	190,000	259,000	0	0	0	1,000	0	0	0	0	179,000	9,000
29	246,000	0	0	0	0	0	0	0	0	0	172,000	419,000
30	220,000	0	1,000	0	0	0	0	0	0	0	192,000	198,000
31	331,000	0	0	0	0	0	0	0	0	0	0	196,000
Misc Insignificant Fuel Burning Sources (Hot Water Heaters and Space Heaters)	28	28	28	7	2	6	2	1	3	4	29	24
Days Run on NG	30	28	28	7	2	6	2	1	3	4	29	24
Monthly Total (scf)	5,881,000	7,791,000	5,124,000	7,000	2,000	10,000	7,000	1,000	3,000	4,000	3,265,000	2,762,000
Daily Maximum (scf)	415,000	418,000	291,000	1,000	1,000	4,000	6,000	1,000	1,000	1,000	192,000	413,000

Annual total (scf)	24,857,000
Daily Maximum (scf)	418,000
TOSD Maximum (scf)	6,000
Total Days Run on NG	164

(February 12, 2021)
(July 25, 2021)

** Char Kilns no longer operational post Ion Exchange commissioning.
This page represents miscellaneous insignificant fuel burning sources.

APPENDIX I

I CALENDAR 2021: FUEL USAGE

	Natural Gas (10 ⁶ cuft)	No. 2 Oil (10 ³ gals)	No. 4 Oil (10 ³ gals)
Boilers	1782.28	78.50	0.00
Misc. Insignificant Sources	24.86		
Peak Boiler Gas Day (June 8, 2020)	7.20		
Peak Misc Sources Fuel Day	0.42		

Carbonation system operated 80.23 % of boiler RODs this year

II FACTORS FROM AP - 42 TABLES

	Natural Gas (lbs/mmcf)	No. 2 Oil (lbs/10 ³ gal)	No. 4 Oil (lbs/10 ³ gal)
Particulates: filterable total	1.9	2	7
filterable <10μ	1.9	1.72	6.02
filterable <2.5μ	1.9	1.12	3.92
condensable	5.7	1.3	1.5
SO ₂	0.6	7.1 (1)	12.105 (1)
NO _x	140.0	10.0	32
CO	84.0	5.0	5.0
VOC	5.5	0.2	0.2
Lead	0.0005	0.0015	0.0015
CO ₂	120,000	22,300	23,650
Methane (CH ₄)	2.3	0.052	0.052
Nitrous oxide (N ₂ O)	2.2	0.26	0.4

No 2 Fuel Oil

(1) SO₂: 142 S, S = % S (0.05) or, 142 x 0.0252 = 7.1

No 4 Fuel Oil

(1) SO₂: 150 S, S = % S (.0807) or, 150 x .0807 = 12.105

III BOILER EMISSIONS

All emissions are calculated using AP 42 Tables and fuel usage.

Boiler stack Emissions = Boiler emissions - Emissions to Carbonatation

1. PARTICULATES

a-1. Gas filterable	1,782.28	mmcf	x	1.9 lbs/mmcf =	3,386.33	lb/yr
a-2. Gas condensible	1,782.28	mmcf	x	5.7 lbs/mmcf =	10,158.99	lb/yr
c-1. #2 Oil filterable total	78.50	10 ³ gal	x	2.0 lb/10 ³ gal =	156.99	lb/yr
c-2. #2 Oil filterable <10μ	78.50	10 ³ gal	x	1.72 lb/10 ³ gal =	135.01	lb/yr
c-3. #2 Oil filterable <2.5μ	78.50	10 ³ gal	x	1.12 lb/10 ³ gal =	87.92	lb/yr
c-4. #2 Oil condensible	78.50	10 ³ gal	x	1.3 lb/10 ³ gal =	102.05	lb/yr
d-1. #4 Oil filterable total	0.00	10 ³ gal	x	7.0 lb/10 ³ gal =	0.00	lb/yr
d-2. #4 Oil filterable <10μ	0.00	10 ³ gal	x	6.0 lb/10 ³ gal =	0.00	lb/yr
d-3. #4 Oil filterable <2.5μ	0.00	10 ³ gal	x	3.9 lb/10 ³ gal =	0.00	lb/yr
d-4. #4 Oil condensible	0.00	10 ³ gal	x	1.5 lb/10 ³ gal =	0.00	lb/yr
Total boiler emissions (a-1. + a-2. + b-1. + b-4.) =					<u>14,027.30</u>	<u>lb/yr</u>
Boiler emissions to Carbonatation = 14,027.30 x .15 x 0.8 =					<u>1,688.10</u>	<u>lb/yr</u>
Total Boiler stack emissions =					<u>12,339.20</u>	<u>lb/yr</u>
Or					<u>6.17</u>	<u>TPY</u>

Emissions for each boiler (particulate, as well as other criteria pollutants) are calculated as follows:

$$\text{Any boiler PM emissions (T/yr)} = \frac{\text{Total boiler PM emissions (T/yr)} \times \text{Any boiler operating days}}{\sum \text{All boiler operating days}}$$

$$\text{Any boiler stack PM emissions (T/yr)} = \text{Any boiler PM emissions (T/yr)} \times (1.00 - [.15][.84])$$

$$\text{Any boiler stack PM emissions (lb/day)} = \text{Any boiler stack PM emissions (T/yr)} \times 2000 / \text{oper. days}$$

2. SO₂

a. Gas	1,782.28 mmcf x	0.6 lb/mmcf =	1,069.37 lb/yr
c. No. 2 Oil	78.50 10 ³ gal x	7.1 lb/10 ³ gal =	557.33 lb/yr
d. No. 4 Oil	0.00 10 ³ gal x	12.105 lb/10 ³ gal =	0.00 lb/yr
Total boiler emissions =			1,626.70 lb/yr
Boiler emissions to Carbonatation =	1,626.70 x .15 x 0.8 =		195.76 lb/yr
Total Boiler stack emissions =			1,430.93 lb/yr
Or			0.72 TPY

3. NO_x (from CEMS Data)

(Via CEMS data/ Method 19)

a. Gas	B1 (lb/yr) + B2 (lb/yr) + B3 (lb/yr) + B4 (lb/yr) + B6 (lb/yr)		79,655.70 lb/yr
	CE1 (25,060.2) + CE2 (9,705.9) + CE3 (9,537.9) + CE4 (11,523.4) + Boiler 6 (23,828.3)		
b. No. 2, 4 Oil	78.50 10 ³ gal	(Via CEMS data/ Method 19)	1195.70 lb/yr
	CE1 (226.2) + CE2 (331.5) + CE3 (360.5) + CE4 (277.5)		
Total boiler emissions =			80,851.40 lb/yr
Boiler emissions to Carbonatation (using total CEMS output) =	80,851.40 / (100 - (.15 x 0.8)) =		809.49 lb/yr
	Total Nox Emissions =		80,041.91
	Total Boiler stack emissions =		80,851.40 lb/yr
Or			40.43 TPY

4. CO

a. Gas	1,782.28 mmcf x	84.0 lb/mmcf =	149,711.48 lb/yr
c. No. 2 Oil	78.50 10 ³ gal	5.0 lb/10 ³ gal =	392.49 lb/yr
d. No. 4 Oil	0.00 10 ³ gal	5.0 lb/10 ³ gal =	0.00 lb/yr
Total boiler emissions =			150,103.97 lb/yr
Boiler emissions to Carbonatation =	150,103.97 x .15 x 0.8 =		<u>18,064.09 lb/yr</u>
Total Boiler stack emissions =			132,039.88 lb/yr
Or			66.02 TPY

5. VOC

a. Gas	1,782.28 mmcf x	5.5 lb/mmcf =	9,802.54 lb/yr
c. No. 2 Oil	78.50 10 ³ gal	0.20 lb/10 ³ gal =	15.70 lb/yr
d. No. 4 Oil	0 10 ³ gal	0.20 lb/10 ³ gal =	0.00 lb/yr
Total boiler emissions =			9,818.24 lb/yr
Boiler emissions to Carbonatation =	9,818.24 x .15 x 0.8 =		<u>1,181.56 lb/yr</u>
Total Boiler stack emissions =			8,636.67 lb/yr
Or			4.32 TPY

6. Lead

a. Gas	1,782.28 mmcf x	0.0005 lb/mmcf =	0.89 lb/yr
c. No. 2 Oil	78.50 10 ³ gal	0.0015 lb/10 ³ gal =	0.12 lb/yr
d. No. 4 Oil	0 10 ³ gal	0.0015 lb/10 ³ gal =	0.00 lb/yr
Total boiler emissions =			1.01 lb/yr
Boiler emissions to Carbonatation =	1.01 x .15 x 0.8 =		<u>0.12 lb/yr</u>
Total Boiler stack emissions =			0.89 lb/yr
Or			0.0004 TPY

7. Methane (equation from 40 CFR Part 98 Subpart C; $CH_4 = 1 \times 10^{-3} \cdot \text{Fuel} \cdot \text{HHV} \cdot \text{EF}$)

a. Gas		4,031.4 lb/yr
	$0.001 \text{ metric ton/kg} \times 1782279527 \text{ scf} \times 0.001026 \text{ MMBtu/scf} \times 0.001 \text{ kg/MMBTU} \times 2204.6 \text{ lb/metric ton}$	
b. All Fuel Oil		72.58 lb/yr
No. 2	$0.001 \text{ metric ton/kg} \times 78497 \text{ gal} \times 0.139808 \text{ MMBtu/gal} \times 0.003 \text{ kg/MMBTU} \times 2204.6 \text{ lb/metric ton} =$	
No. 4	$0.001 \text{ metric ton/kg} \times 0 \text{ gal} \times 0 \text{ MMBtu/gal} \times 0.003 \text{ kg/MMBTU} \times 2204.6 \text{ lb/metric ton} =$	
Total boiler emissions =		4,103.96 lb/yr
Boiler emissions to Carbonatation =	$4,103.96 \times .15 \times 0.8 =$	493.89 lb/yr
Total Boiler stack emissions =		3,610.07 lb/yr
Or		1.81 TPY

8. Nitrous Oxide (equation from 40 CFR Part 98 Subpart C; $N_2O = 1 \times 10^{-3} \cdot \text{Fuel} \cdot \text{HHV} \cdot \text{EF}$)

a. Gas		403.1 lb/yr
	$0.001 \text{ metric tons/kg} \times 1782279527 \text{ scf} \times 0.001026 \text{ MMBtu/scf} \times 0.0001 \text{ kg/MMBTU} \times 2204.6 \text{ lb/metric ton}$	
b. All Fuel Oil		14.52 lb/yr
No. 2	$0.001 \text{ metric ton/kg} \times 78497 \text{ gal} \times 0.139808 \text{ MMBtu/gal} \times 0.0006 \text{ kg/MMBTU} \times 2204.6 \text{ lb/metric ton} =$	
No. 4	$0.001 \text{ metric ton/kg} \times 0 \text{ gal} \times 0 \text{ MMBtu/gal} \times 0.0006 \text{ kg/MMBTU} \times 2204.6 \text{ lb/metric ton} =$	
Total boiler emissions =		417.65 lb/yr
Boiler emissions to Carbonatation =	$417.65 \times .15 \times 0.8 =$	50.26 lb/yr
Total Boiler stack emissions =		367.39 lb/yr
Or		0.18 TPY

9. Carbon Dioxide (equation from 40 CFR Part 98 Subpart C; $CO_2 = 1 \times 10^{-3} \cdot \text{Fuel} \cdot \text{HHV} \cdot \text{EF}$)

a. Gas		213,904,651.1 lb/yr
	$0.001 \text{ metric tons/kg} \times 1782279527 \text{ scf} \times 0.001026 \text{ MMBtu/scf} \times 53.06 \text{ kg/MMBTU} \times 2204.6 \text{ lb/metric tons}$	
b. All Fuel Oil		1,789,417.94 lb/yr
No. 2	$0.001 \text{ metric ton/kg} \times 78497 \text{ gal} \times 0.139808 \text{ MMBtu/gal} \times 73.96 \text{ kg/MMBTU} \times 2204.6 \text{ lb/metric ton} =$	
No. 4	$0.001 \text{ metric ton/kg} \times 0 \text{ gal} \times 0 \text{ MMBtu/gal} \times 75.04 \text{ kg/MMBTU} \times 2204.6 \text{ lb/metric ton} =$	
Total boiler emissions =		215,694,069.05 lb/yr
Boiler emissions to Carbonatation =	$215,694,069.05 \times .15 \times 0.8 =$	25,957,452.44 lb/yr
Total Boiler stack emissions =		189,736,616.61 lb/yr
Or		94,868.31 TPY

III.B BOILER EMISSIONS TOSD Calculations

TOSD CALCULATIONS

Fuel: Natural Gas

Maximum 24 hour usage reported in 2021:

(September 10, 2021) = 7.201×10^6 cu ft

BOILERS

Carbonation: Operating 80.23 % of boiler RODs this year

Flue Gases to Carbonation: 15% of total when in operation

Total emissions to stack from the four operating boilers in pounds:

Particulates: (not required on Form 3)

SOX:	7.201×10^6 cu ft x	0.6 lb/mmcf x 0.88	= 3.8 lb/day (not an ozone precursor)
NOX:	7.201×10^6 cu ft x	140.0 lb/mmcf x 0.88	= 886.87 lb/day
CO:	7.201×10^6 cu ft x	84.0 lb/mmcf x 0.88	= 532.12 lb/day (not an ozone precursor)
VOC:	7.201×10^6 cu ft x	5.5 lb/mmcf x 0.88	= 34.84 lb/day

CARBONATATION

Particulates: Carbonation scrubber and liquor bed remove 100% (Para. V A.6)

SO2: Carbonation scrubber removes 95% (Para. V A.7)

Particulates: (not required on Form 3)

SOX:	7.201×10^6 cu ft x	0.6 lb/mmcf x 0.01	= 0.03 lb/day (not an ozone precursor)
NOX:	7.201×10^6 cu ft x	140.0 lb/mmcf x 0.12	= 121.33 lb/day
CO:	7.201×10^6 cu ft x	84.0 lb/mmcf x 0.12	= 72.8 lb/day (not an ozone precursor)
VOC:	7.201×10^6 cu ft x	5.5 lb/mmcf x 0.12	= 4.77 lb/day

IV CHAR KILNS / MISCELLANEOUS INSIGNIFICANT SOURCES

Char Kilns RODs in 2021 = 0

Fuel: Natural Gas; Operations: 24 hr/day

For Misc Insignificant Sources (hot water heaters, space heaters, etc.)

Maximum daily consumption was 418,000 cu ft on February 12, 2021

Total days of operation: 164

Annual fuel usage, from page 1, Misc Insignif Sources = 24.86×10^6 cu ft = A in formulas

1. PM Filterable:	$24.86 \times 1.9 =$	47.23 lb/yr	0.02 TPY	lbs/day:	0.29
PM Condensable:	$24.86 \times 5.7 =$	141.68 lb/yr	0.07 TPY	lbs/day:	0.86
2. SO2:	$24.86 \times 0.6 =$	14.91 lb/yr	0.01 TPY	lbs/day:	0.09
3. NOx:	$24.86 \times 140 =$	3,479.98 lb/yr	1.74 TPY	lbs/day:	21.22
4. CO:	$24.86 \times 84 =$	2,087.99 lb/yr	1.04 TPY	lbs/day:	12.73
5. VOC:	$24.86 \times 5.5 =$	136.71 lb/yr	0.07 TPY	lbs/day:	0.83
6. Lead:	$24.86 \times 0.0005 =$	0.01 lb/yr	0 TPY	lbs/day:	0.0001
7. CO2:	$24.86 \times 120000 =$	2,982,840.00 lb/yr	1491.42 TPY	lbs/day:	18,188.05
8. Methane:	$24.86 \times 2.3 =$	57.17 lb/yr	0.03 TPY	lbs/day:	0.35
9. Nitrous oxide:	$24.86 \times 2.2 =$	54.69 lb/yr	0.03 TPY	lbs/day:	0.33

TOSD

Char Kilns fuel used TOSD = 0 x 10⁶ cu ft

Particulates: N/A

SO ₂ :	0.000 10 ⁶ cu ft x	0.6 lb/mmcf =	0.00	lb/day
Nox:	0.000 10 ⁶ cu ft x	140.0 lb/mmcf =	0.00	lb/day
CO:	0.000 10 ⁶ cu ft x	84.0 lb/mmcf =	0.00	lb/day
VOC:	0.000 10 ⁶ cu ft x	5.5 lb/mmcf =	0.00	lb/day

V CARBONATATION SYSTEM

A. DATA AND ASSUMPTIONS

System operated fully in 2021.
Carbonation RODs in 2021 = 280
Boilers in operation when Carbonation was running
Boiler days on Carbonation = 280
When running Carbonation uses 15% of flue gases
Carbonation scrubber eliminates 99% of particulates, from flue gases, the remaining is absorbed by the liquid bed.
Carbonation scrubber removes 95% of SO_x from flue gases to Carbonation.

Carbonation scrubber removes 20% of NO_x as NO₂. (no reduction claimed - see permit).
Carbonation scrubber removes 10-20% of VOC when acid or soluble in water (no reduction claimed - see permit).

Carbonation scrubber does not remove CO, none claimed.
Pollutants not removed by carbonation scrubber (or not claimed) are reported as emissions through vents instead of boiler house stack.
Flue gases to carbonation scrubber have the same concentrations as the boiler emissions, so that 15% of these pollutants when carbonation is running Gas, the feed to carbonation is from the boilers on No. 6 oil.

B. FLUE GASES TO CARBONATATION

Pounds/year listed below for the various pollutants come from III.B.1-9 (pages 3-5).

##### Particulates:	1,688.10 lb/yr (100% removed) =	0 lb/yr
##### SO ₂ :	195.76 lb/yr (95% removed) =	9.79 lb/yr
##### Nox:	809.49 lb/yr (no reduction claimed)	
##### CO:	18,064.09 lb/yr (no reduction)	
##### VOC:	1,181.56 lb/yr (no reduction claimed)	
##### Lead:	0.12 lb/yr (assumed particulate; 100% removed) =	0 lb/yr
##### CO ₂ :	25,957,452.44 lb/yr (assumed no reduction)	
##### Methane:	493.89 lb/yr (assumed no reduction)	
##### Nitrous oxide:	50.26 lb/yr (assumed no reduction)	

C. EMISSIONS FROM CARBONATATION FROM FLUE GAS FEED

#/yr from Paragraph B, above; T/yr = (#/yr) / 2000; # /day = (#/year) / Carb RODs

	<u>Tons/yr</u>	<u>Pounds/yr</u>	<u>Pounds/day</u>
##### Particulates:	-	-	-
##### SO ₂ :	0.0049	9.79	0.03
##### Nox:	0.40	809.49	2.89
##### CO:	9.03	18,064.09	64.51
##### VOC:	0.59	1,181.56	4.22
##### Lead:	-	-	-
##### CO ₂ :	12,978.73	25,957,452.44	92,705.19
##### Methane:	0.25	493.89	1.76
##### Nitrous oxide:	0.03	50.26	0.18

VI EMERGENCY GENERATOR

Engine size = 250 KW = 335 hp
 Operating hours = 196
 Fuel Btu Content = 139808 Btu/gal
 Fuel S Content = 0.0015 %
 Assume: 90 gal/hr burned

FACTORS FROM TABLES IN AP - 42 SECTION 3.3

	Diesel Fuel (lbs/MMBtu)
Particulates: PM10	0.31
SO ₂	0.29
NO _x	4.41
CO	0.95
VOC	0.35
Aldehydes	0.07
CO ₂	164

	lb/MMBtu x MMBtu/gal x gal/hr x hr/yr =	lb/yr	TPY	lb/day*
1. PM10	0.31 x 0.139808 x 90 x 196 =	764.53	0.38	93.62
2. SO ₂ :	0.29 x 0.139808 x 90 x 196 =	715.20	0.36	87.58
3. NO _x :	4.41 x 0.139808 x 90 x 196 =	10,876.00	5.44	1,331.76
4. CO:	0.95 x 0.139808 x 90 x 196 =	2,342.90	1.17	286.89
5. VOC:	0.35 x 0.139808 x 90 x 196 =	863.17	0.43	105.69
6. Aldehydes:	0.07 x 0.139808 x 90 x 196 =	172.63	0.09	21.14
7. CO ₂ :	164 x 0.139808 x 90 x 196 =	404,458.95	202.23	49,525.59

* assume 24 hr/day operation

APPENDIX I

	NG Used (scf)	NG days	No 6 Fuel Oil Used (gal)	No 6 Fuel Oil days	No 2 Fuel Oil Used (gal)	No 2 Fuel Oil days	No 4 Fuel Oil Used (gal)	No 4 Fuel Oil days
Boiler 1	414,919,821	268	0	0	18,074	1	0	0
Boiler 2	154,667,699	109	0	0	23,853	3	0	0
Boiler 3	198,140,500	127	0	0	22,267	0	0	0
Boiler 4	193,233,019	160	0	0	14,303	3	0	0
Boiler 6	823,275,645	255	0	0	0	0	0	0
Misc Insignif Fuel Use Sources	24,857,000	164	NA	NA	NA	NA	NA	NA

TAP Emissions from Burning Fuel Oil*

IIAP	Emission Factor (lb/1000 gal)	Boiler 1 (lb/yr)	Boiler 2 (lb/yr)	Boiler 3 (lb/yr)	Boiler 4 (lb/yr)	Boiler 6 (lb/yr)	Total (lb/yr)
Antimony	5.25E-03	0.095	0.125	0.117	0.075	0.000	0.412
Arsenic	1.32E-03	0.024	0.031	0.029	0.019	0.000	0.104
Benzene	2.14E-04	0.004	0.005	0.005	0.003	0.000	0.017
Barium	2.57E-03	0.046	0.061	0.057	0.037	0.000	0.202
Beryllium	2.78E-05	0.001	0.001	0.001	0.000	0.000	0.002
Cadmium	3.98E-04	0.007	0.009	0.009	0.006	0.000	0.031
Chloride	3.47E-01	6.272	8.277	7.727	4.963	0.000	27.238
Chromium	8.45E-04	0.015	0.020	0.019	0.012	0.000	0.066
Chromium VI	2.48E-04	0.004	0.006	0.006	0.004	0.000	0.019
Cobalt	6.02E-03	0.109	0.144	0.134	0.086	0.000	0.473
Copper	1.76E-03	0.032	0.042	0.039	0.025	0.000	0.138
Ethylbenzene	6.36E-05	0.001	0.002	0.001	0.001	0.000	0.005
Formaldehyde	3.30E-02	0.596	0.787	0.735	0.472	0.000	2.590
Fluoride	3.73E-02	0.674	0.890	0.831	0.534	0.000	2.928
Lead	1.51E-03	0.027	0.036	0.034	0.022	0.000	0.119
Manganese	3.00E-03	0.054	0.072	0.067	0.043	0.000	0.235
Mercury	1.13E-04	0.002	0.003	0.003	0.002	0.000	0.009
Molybdenum	7.87E-04	0.014	0.019	0.018	0.011	0.000	0.062
1,1,1-Trichloroethane (Methyl Chloroform)	2.36E-04	0.004	0.006	0.005	0.003	0.000	0.019
Naphthalene	1.13E-03	0.020	0.027	0.025	0.016	0.000	0.089
Nickel	8.45E-02	1.527	2.016	1.882	1.209	0.000	6.633
POMs: Acenaphthene	2.11E-05	0.000	0.001	0.000	0.000	0.000	0.002
Acenaphthylene	2.53E-07	0.000	0.000	0.000	0.000	0.000	0.000
Anthracene	1.22E-06	0.000	0.000	0.000	0.000	0.000	0.000
Benz(a)anthracene	4.01E-06	0.000	0.000	0.000	0.000	0.000	0.000
Benzo(b,k)fluoranthene	1.48E-06	0.000	0.000	0.000	0.000	0.000	0.000
Benzo(g,h,i)perylene	2.26E-06	0.000	0.000	0.000	0.000	0.000	0.000
Chrysene	2.38E-06	0.000	0.000	0.000	0.000	0.000	0.000
Dibenzo(a,h)anthracene	1.67E-06	0.000	0.000	0.000	0.000	0.000	0.000
Fluoranthene	4.84E-06	0.000	0.000	0.000	0.000	0.000	0.000
Fluorene	4.47E-06	0.000	0.000	0.000	0.000	0.000	0.000
Indo(1,2,3-cd)pyrene	2.14E-06	0.000	0.000	0.000	0.000	0.000	0.000
Phenanthrene	1.05E-05	0.000	0.000	0.000	0.000	0.000	0.001
Pyrene	4.25E-06	0.000	0.000	0.000	0.000	0.000	0.000
OCDD	3.10E-09	0.000	0.000	0.000	0.000	0.000	0.000
Phosphorous	9.46E-03	0.171	0.226	0.211	0.135	0.000	0.743
Selenium	6.83E-04	0.012	0.016	0.015	0.010	0.000	0.054
Toluene	6.20E-03	0.112	0.148	0.138	0.089	0.000	0.487
Vanadium	3.18E-02	0.575	0.759	0.708	0.455	0.000	2.496
Xylene	1.09E-04	0.002	0.003	0.002	0.002	0.000	0.009
Zinc	2.91E-02	0.526	0.694	0.648	0.416	0.000	2.284
Total		10.285	13.573	12.671	8.139	0.000	44.668

TAP Emissions from Burning Natural Gas*

HAP	Emission Factor (lb/10 ⁶ ft)	Boiler 1 (lb/yr)	Boiler 2 (lb/yr)	Boiler 3 (lb/yr)	Boiler 4 (lb/yr)	Boiler 6 (lb/yr)	Misc Insignif Sources (lb/yr)	Total (lb/yr)
Acenaphthene	0.0000018	0.001	0.000	0.000	0.000	0.001	0.000	0.003
Acenaphthylene	0.0000018	0.001	0.000	0.000	0.000	0.001	0.000	0.003
Anthracene	0.0000024	0.001	0.000	0.000	0.000	0.002	0.000	0.004
Arsenic	0.0002	0.083	0.031	0.040	0.039	0.165	0.005	0.357
Benz(a)anthracene	0.0000018	0.001	0.000	0.000	0.000	0.001	0.000	0.003
Benzene	0.0021	0.871	0.325	0.416	0.406	1.729	0.052	3.747
Benzo(a)pyrene	0.0000012	0.000	0.000	0.000	0.000	0.001	0.000	0.003
Benzo(b)fluoranthene	0.0000018	0.001	0.000	0.000	0.000	0.001	0.000	0.003
Benzo(g,h,i)perylene	0.0000012	0.000	0.000	0.000	0.000	0.001	0.000	0.002
Benzo(k)fluoranthene	0.0000018	0.001	0.000	0.000	0.000	0.001	0.000	0.003
Beryllium	0.000012	0.005	0.002	0.002	0.002	0.010	0.000	0.021
Cadmium	0.0011	0.456	0.170	0.218	0.213	0.906	0.027	1.963
Chromium	0.0014	0.581	0.217	0.277	0.271	1.153	0.035	2.498
Chrysene	0.0000018	0.001	0.000	0.000	0.000	0.001	0.000	0.003
Cobalt	0.000084	0.035	0.013	0.017	0.016	0.069	0.002	0.150
Copper	0.00085	0.353	0.131	0.168	0.164	0.700	0.021	1.517
Dibenzo(a,h)anthracene	0.0000012	0.000	0.000	0.000	0.000	0.001	0.000	0.002
Dichlorobenzene	0.0012	0.498	0.186	0.238	0.232	0.988	0.030	2.141
Fluoranthene	0.000003	0.001	0.000	0.001	0.001	0.002	0.000	0.005
Fluorene	0.0000028	0.001	0.000	0.001	0.001	0.002	0.000	0.005
Formaldehyde	0.075	31.119	11.600	14.861	14.492	61.746	1.864	133.818
n-Hexane	1.800	746.856	278.402	356.653	347.819	1481.896	44.743	3211.626
Indeno(1,2,3-cd)pyrene	0.0000018	0.001	0.000	0.000	0.000	0.001	0.000	0.003
Lead	0.0005	0.207	0.077	0.099	0.097	0.412	0.012	0.892
Manganese	0.00038	0.158	0.059	0.075	0.073	0.313	0.009	0.678
Mercury	0.00026	0.108	0.040	0.052	0.050	0.214	0.006	0.464
Naphthalene	0.00061	0.253	0.094	0.121	0.118	0.502	0.015	1.088
Nickel	0.0021	0.871	0.325	0.416	0.406	1.729	0.052	3.747
Phenanthrene	0.000017	0.007	0.003	0.003	0.003	0.014	0.000	0.030
Pyrene	0.000005	0.002	0.001	0.001	0.001	0.004	0.000	0.009
Selenium	0.000024	0.010	0.004	0.005	0.005	0.020	0.001	0.043
Toluene	0.0034	1.411	0.526	0.674	0.657	2.799	0.085	6.066
Zinc	0.029	12.033	4.485	5.746	5.604	23.875	0.721	51.743
Total		783.894	292.208	374.340	365.069	1555.387	53.028	3370.898

*Based on AP42 factors for gas (Tables 1.4-2 & -3 & -4) and fuel oil (Tables 1.3-9 & -11)

APPENDIX I
VOC - NON-FUEL SOURCES

CALCULATIONS AND FORMULAS

Evaporators (S5-7)

Isopropyl Alcohol Usage = 38,898 lbs based on purchase records
Condenser Efficiency = 98 %
Operating Days = 280 days

$$\text{lbs purchased} \times (1 - \text{Efficiency}/100) / 2000 = 0.3890 \text{ TPY}$$

Packaging Video Inkjet Printers (S5-15)

Ink/Solvent	Usage (gal/yr)	Density (lb/gal)	VOC Content (%)	
Marsh Solvent	0	8.42	2	
V709-D Solvent	165.8097	7.18	99	*
V806D Solvent	0			
901-Q Solvent	0	6.67	99	*
V903-Q Solvent	27.4664	6.72	99	
9838500t	0	7.09	100	
350 Ink	470	8.76	1	
352 Ink	0	7.84	1	
1835 Ink	265	7.84	100	
511-C Ink	0	7.22	80	
9800201 Ink	0	7.51	35	
V461D 1620 vid jet ink cart	20.2062	7.58	86	*
500 Ink	0.00			
ScanTrue II (1081301) Ink	0.5282	8.345	84	*

$$\sum_{i=1}^n (\text{Usage}_i * \text{Density}_i * (\text{VOC Content}_i/100)) = 3615.53 \text{ lb/yr}$$

Packaging Adhesives Fugitives (S5-16)

Glue Type	Usage (lb/yr)	VOC Content (%)
Hot Melt Glue (TS200, PHC 8262, PHC 9254)	153,223	0.1
Cold Glue (A1940 PT5P, PA 3501 EN)	67,909	0.55

$$\sum_{i=1}^n (\text{Usage}_i * \text{Density}_i * (\text{VOC Content}_i/100)) = 526.72 \text{ lb/yr}$$

Auto Shop Parts Washer (U3-1) + Machine Shop Parts Washer (U11-1) + Powerhouse Parts Washer

Solvent evaporated	90	gal/service
Number of services	4	
Density of Solvent	6.54	lb/gal

$$\text{gal/service} \times \text{number of services} \times \text{Density} = 2354.4 \text{ lb/yr}$$

One Additional Parts Washer in Packaging

Solvent evaporated	30	gal/service
Number of services	4	
Density of Solvent	6.54	lb/gal

$$\text{gal/service} \times \text{number of services} \times \text{Density} = 784.8 \text{ lb/yr}$$

Maintenance Steel Cutting (U11-4)

Determined Insignificant by Title V

APPENDIX I
NO_x - NON-FUEL SOURCES

NO_x CALCULATIONS AND FORMULAS

Maintenance Steel Cutting (U11-4)

Determined Insignificant by Title V

APPENDIX I
CO - NON-FUEL SOURCES

CALCULATIONS AND FORMULAS

Maintenance Steel Cutting (U11-4)

Determined Insignificant by Title V

APPENDIX I
SO2 - NON-FUEL SOURCES

CALCULATIONS AND FORMULAS

Maintenance Steel Cutting (U11-4)

Determined Insignificant by Title V

APPENDIX I
PARTICULATES - NON-FUEL SOURCES

CALCULATIONS AND FORMULAS

(For control equipment in operation)

1. Emissions (lb/day) = (1440 min/day x 0.02 gr/cuft x A x V) / (7000 gr/cuft) =
0.0041142 x A x V

or: Emissions (lb/day) = F x A x V

where: F = 0.0041142

V = number of identical units

A = volume in cfm

2. Emissions in Tons / year = [Emissions (#/day) x RODs] / [2000 # / Ton]

where RODs (Refinery Operating Days) = Packing or process equipment operating days.

Numbers Listed referred below are those on Appendix II page 3 .

2021 Char House RODs = 0

Unless specified below, all points ran 24 hrs/day when operating

RODs for Registration listed Nos. 1, 15, 16, & 17 (Char related dust collectors) = 0

RODs for Registration listed Nos. 2, 3, 4, 18, 30-45 = 280

RODs for Registration listed No. 5 = 280

RODs for Registration listed Nos. 6, 7, 21, 22, 23, 24, 25 26 & 27 = 280

RODs for Registration listed No. 8 = 280

RODs for Registration listed No. 9 = 280

RODs for Registration listed No. 10 = 280

RODs for Registration listed No. 11 = 280

RODs for Registration listed No. 12 = 280

RODs for Registration listed No. 13 = 280

RODs for Registration listed No. 14:

Feed loop = 280

5# line = 280

Packets = 280

Packet / 2 # 10 X Rotoclone = 280

RODs for Registration listed No. 19 & 28 = 280

RODs for Registration listed No. 20 = 280

RODs for Registration listed No. 29 (Dock Discharge) = 245

EQUIPMENT	REGISTRATION NUMBER	RODs	Pounds / day	Tons / yr
1. Char Dust	24-8-0217	0	$F \times 1 \times 7000 = 28.8$	0.0
1a. Char Dust	24-8-0217 M	0	$F \times 1 \times 6000 = 24.8$	0.0
2. Sugar Melter	24-8-0226	280	$F \times 1 \times 3000 = 12.3$	1.7
3. Sugar BMA	24-8-0115	280	$F \times 1 \times 13,000 = 53.48$	7.5
4. Sugar Feeco Dryer	24-8-0320 N	280	$F \times 1 \times 47,000 = 193.4$	27.1
5. Sugar Conveying Syst.	24-8-0106 & 0115M	280	$F \times 1 \times 11,990 = 49.3$	6.9
6. Sugar Mills (new Mill 1)	24-8-0209	280	$F \times 1 \times 1350 = 5.55$	0.8
6a. Sugar Mills (new Mill 2)	24-8-0209	280	$F \times 1 \times 1350 = 5.55$	0.8
7. Sugar Mills (new Mill #3)	24-8-0125	280	$F \times 1 \times 2500 = 10.3$	1.4
8. Sugar Mill	24-8-0266 #7 Mill	280	$F \times 1 \times 10,000 = 41.1$	5.8
9. Bulk Sugar Conveying	24-8-0212	280	$F \times 1 \times 23,000 = 94.6$	13.2
10. Sugar Bulk Loading	24-8-0223	280	$F \times 1 \times 15,000 = 61.7$	8.6
11. Sugar 2 # 10 X	24-8-0222	280	$F \times 1 \times 8300 \times = 34.1$	4.8
12. Sugar 1 # 10 X	24-8-0296 *	280	$F \times 1 \times 500 = 2.1^*$	0.3
13. Sugar XS System	24-8-0225	280	$F \times 1 \times 8300 = 34.1$	4.8

EQUIPMENT	REGISTRATION NUMBER	RODs	Pounds / day	Tons / yr
14. Sugar Packing	24-8-0265	280	$F \times 1 \times 7875 = 32.4$	4.5
		280	$F \times 1 \times 1800 = 22.2$	3.1
		280	$F \times 1 \times 185 = 0.8$	0.1
		280	$F \times 1 \times 6500 = 26.7$	3.7
15. Char Conveyor	24-8-0286	0	$F \times 1 \times 4600 = 18.9$	0.0
16. Char Gravity Separator	24-8-0293	0	$F \times 1 \times 4000 = 16.5$	0.0
17. Char Kiln Fan	24-8-0205	0	$F \times 2 \times 10,000 = 82.284$	0.0
18. Lime Carb. System	24-8-0301	280	$F \times 1 \times 1200 = 4.9$	0.7
19. Thiele - Wheelabrator 7-5-2	24-8-0287	280	$F \times 1 \times 7000 = 28.8$	4.0
20. Specialty Sugar Dryer #1 Dryers #2 & #3 Packaging & Conveying	510-8-0332			
		280	$F \times 1 \times 13,000 = 53.5$	7.5
		280	$F \times 1 \times 23,900 = 98.33$	13.8
		280	$F \times 1 \times 6,400 = 26.6$	3.7
21. Finish House Wheelabrators (6-5-1, 6-5-2, 6-5-3)	8-0225, 8-0115 & 8-0296	280	$F \times 3 \times 8000 = 98.74$	13.8
22. Invert System	8-2022	280	$F \times 1 \times 3000 = 12.3$	1.7
23. Starch Receiver 1	8-0209	280	$F \times 1 \times 1350 = 5.55$	0.8
24. Starch Receiver 2	8-0209	280	$F \times 1 \times 1350 = 5.55$	0.8
25. Starch Receiver 3	8-0125	280	$F \times 1 \times 2500 = 10.285$	1.4
26. Starch Bin	24-8-0209	280	$F \times 1 \times 1200 = 4.94$	0.7
27. Carton/Bag/Package Feed	24-8-0265	280	$F \times 1 \times 8300 \times = 34.1$	4.8
28. Wheelabrator 7-5-1	24-8-0212	280	$F \times 1 \times 8000 = 32.91$	4.6
29. Raw Sugar Unloading & Conveying	6-2019	245	341.6	41.846
30. Raw Sugar Shed	6-2019	280	85.4	11.956
31. Melter Feed		280	170.8	23.912
32. Diatomite Fugitives		280	1.326	0.1856

33. Celite Fugitives		280	6.389	0.8945
34. Mud Loading	8-0301	280	0.008	0.0011
35. Scrap Melter 2	8-0382	280	0.1525	0.0214
36. Remelt Screw Conveyor	8-0382	280	0.915	0.1281
37. Caustic Fugitives	6-2022	280	0.0603	0.0084
38. Soft Sugar Shredder	6-2020	280	0.0915	0.0128
39. Bin Tower Rejects Box	24-8-0212	280	0.0305	0.0043
40. Packaging Feed Tank 1	24-8-0265	280	0.1133	0.0159
41. Packaging Feed Tank 2	24-8-0265	280	0.0668	0.0094
42. Packaging Feed Tank 3	24-8-0265	280	0.011	0.0015
43. Maltodex Supersack Unloading	24-8-0266	280	0.1403	0.0196
44. Remelt Shredder Fugitive		280	0.427	0.0598
45. Magnet Tailings Fugitives	24-8-0223	280	0.0015	0.0002
46. Cooling Tower CT-3	24-8-0383	365	0.1	0.0183
47. Maintenance Welding		365	0.4	0.0730
48. Powdered Sugar Bulk Tote	approved 6/2020 (1)	60	4.32	0.1296
49. Four Finished Sugar Silos	approved 2/2021 (2)	0	0	0.0000
50. Modified 10X Filler	approved 4/2021 (3)	0	0	0.0000
51. Conveyance - Old Raw Sugar Shed & Barge	approved 8/2021 (4)	0	0	0.0000
TOTAL*			612.4	232.8
Emergency Request --- Fire Clean-Up/Conveyance of Raw Sugar from Burned Shed	emergency approval for 4/27/21-5/7/21 (5)	11	350	1.9250

* Indoor Exhaust; Excluded from Total

** Total Pounds per day is for day when all operational lines run 24 hours or the peak possible load.

The Total pounds per day was not adjusted for the actual number of operating days as was the Tons/yr.

(1) Powdered Sugar Bulk Tote Line operated to produce 600 totes (1,200,000 lbs) total, well within 30 days total.

(2) The silos were under construction through 2021. No emissions.

Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	3681470	4572379	0	0	0	0	0	0	0	0	0	0
2	6576026	6179102	0	0	0	0	0	0	0	0	0	0
3	5714992	6484023	0	0	0	0	0	0	0	0	0	0
4	6800487	5429664	0	0	0	0	0	0	0	0	0	0
5	5975503	4981876	0	0	0	0	0	0	0	0	0	0
6	5382444	21923	0	0	0	0	0	0	0	0	0	0
7	5963858	3321936	0	0	0	0	0	0	0	0	0	0
8	4029216	3872045	0	0	0	0	0	0	0	0	0	0
9	0	5817633	0	0	0	0	0	0	0	0	0	0
10	0	6659935	0	0	0	0	0	0	0	0	0	0
11	3613367	6714914	0	0	0	0	0	0	0	0	0	0
12	5731916	6445181	0	0	0	0	0	0	0	0	0	0
13	6069292	522285	0	0	0	0	0	0	0	0	0	0
14	6173068	4344872	0	0	0	0	0	0	0	0	0	0
15	3766824	5632806	0	0	0	0	0	0	0	0	0	0
16	0	6664963	0	0	0	0	0	0	0	0	0	0
17	0	6190345	0	0	0	0	0	0	0	0	0	0
18	0	6408325	0	0	0	0	0	0	0	0	0	0
19	3660602	6927462	0	0	0	0	0	0	0	0	0	0
20	6008722	2299252	0	0	0	0	0	0	0	0	0	0
21	5997378	10227	0	0	0	0	0	0	0	0	0	0
22	6316307	3626732	0	0	0	0	0	0	0	0	0	0
23	1971786	6379312	0	0	0	0	0	0	0	0	0	0
24	0	4841766	0	0	0	0	0	0	0	0	0	0
25	4038847	4871022	0	0	0	0	0	0	0	0	0	0
26	5898778	6009752	0	0	0	0	0	0	0	0	0	0
27	5957755	3005455	0	0	0	0	0	0	0	0	0	0
28	5954791	0	0	0	0	0	0	0	0	0	0	0
29	4362052	3943909	0	0	0	0	0	0	0	0	0	0
30	0	4677886	0	0	0	0	0	0	0	0	0	0
31	0	6341361	0	0	0	0	0	0	0	0	0	0
Melt Days	11	20	21	7	14	16	22	25	26	25	25	24
Monthly Total Melt (pds)	100,133,122	103,621,511	133,978,010	78,433,088	91,610,181	129,711,240	117,557,253	132,337,111	130,738,237	115,976,629	110,612,379	110,596,949
Daily Melt Average (pds)	5,006,656	4,934,358	4,962,149	4,902,068	4,164,099	5,188,450	4,702,290	5,089,889	5,229,529	4,639,065	4,603,849	4,608,206
Annual Melt (pds)	1,355,305,710											
Daily Maximum (pds)	7,403,979											
Total Days of Melt	280											
Total Hours of Melt	6720											



no shifts
1 shift
2 shift
3 shift

* this document is to assess environmental monthly metrics against 100 wt of melt only. It is not in keeping with productions "periods" but rather a fixed "calendar" month.
 ** This Document is to determine the number of operational days and monthly metrics numbers only!!!! NOT FOR RELEASE TO OUTSIDE AGENCIES

American Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	Tank Service	UTM Coordinates		Constr. Start Date	Annual Operating Hours 2021	Tank Orientation	Shell Diam	Shell Height	Shell Length	Equiv Horiz Diam
D3-6A		HCl Tank	31.45% HCl	mE	mN		6720	VERT=1 HORIZ=2 1	"D", (ft) 12	"Hs", (ft) 10	"L", (ft) -	"Dz", (ft) -

American Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	Is Tank Constant Level?	Liquid Height	Roof Type	Cone Roof Slope	Dome Radius	Vapor Space Outage	2021 Annual Throughput	Turnovers	Maximum Fill Rate	Will Tank Have Breather Vents?
			(YES/NO)	"H _L ", (ft)	FLAT CONE or DOME?	"S _R ", (ft/ft)	"R _R ", (ft)	"H _{VO} ", (ft)	Q, (gals)	"N"	(gals/min)	(YES/NO)
D3-6A		HCl Tank	NO	5	CONE	0.0625		5.13	377,985	45	118.4	YES

American Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	Breather Vent Pressure Setting	Breather Vent Vacuum Setting	Tank Shell Color	Tank Roof Color	Tank Paint Cond	Paint Factor	Does Tank Vent to Control Device	Control Device Efficiency (%)
D3-6A		HCl Tank	"P _{BP} ", psig 2	"P _{BV} ", psig -0.03	WHITE	WHITE	GOOD/ POOR	"a" 0.17	(If YES, type) YES	0

American Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	Tank Contents	Wt. %	Mol. Wt.	Mole Fract.	A	B	C	Daily Avg. Liq. Surface Temp	Daily Max. Liq. Surface Temp	Daily Min. Liq. Surface Temp
D3-6A		HCl Tank	Compound 1 HCl (31.45%)	100	36.5	1				"T _{LA} ", deg R 516.8	"T _{LX} ", deg R 521.9	"T _{LN} ", deg R 511.7

American Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	P.Press of Comp 1 @ Daily Avg. Liq. Surface Temp psia	Vap. Press. Daily Avg. Liq. Surface Temp "P _{VA} " psia	Mol. Wt. Of Vapor @ Daily Avg. Liq. Surface Temp "M _V "	P.Press of Comp 1 @ Daily Max. Liq. Surface Temp psia	Vap. Press. Daily Max. Liq. Surface Temp "P _X " psia	P.Press of Comp 1 @ Daily Min. Liq. Surface Temp psia	Vap. Press Daily Min. Liq. Surface Temp "P _{LN} " psia	Vap. Press. Range "DP _V " psia
D3-6A		HCl Tank	0.198	0.198	36.5	0.242	0.242	0.162	0.162	0.080

American Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	Vapor Space Volume	Vapor Density	Vapor Space Expansion Factor	Vented Vapor Saturation Factor	Standing Storage Loss	Vapor Molecular Weight	Vap. Press. Daily Avg. Liq. Surface Temp.	Maximum Annual Throughput
D3-6A		HCl Tank	"V _v ", (ft ³)	"W _v ", (lb/ft ³)	"K _E "	"K _S "	"L _S ", (lbs/yr)	"M _V ", (lb/lb-mole)	"P _{VA} ", (psia)	"Q", (bbls.)
			579.62	0.001	-0.095	0.949	0.0	36.5	0.198	9000

American Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	Turnover Factor	Working Loss Product Factor	Working Loss	Avg Hourly Rate	Max Hourly Rate	Total Loss	Total Loss	Total Loss Comp 1
D3-6A		HCl Tank	"K _N " 0.838096	"K _P " 1	"L _w ", (lbs/yr) 54.5	(lbs/hr) 0.008	(lbs/hr) 1.253	(lbs/yr) 54.5	(tpy) 0.027	(lbs/yr) 54.4606

Summary 2021						
Pt. Source No.	MDE Regis. No.	Tank ID No.	Compound 1	Average Emissions (lbs/hr)	Maximum Emissions (lbs/hr)	Annual Emissions (tpy)
D3-6A		HCl Tank	HCl (31.45%)	0.006	1.253	0.0272

Air Emissions Calculation Sheet

2021

HCl Scrubber

AMERICAN SUGAR REFINING, INC.-BALTIMORE DOMINO SUGAR REFINERY

Source Description: HCl TANK SCRUBBER

MDE Registration No.:

Point Source ID No.: D3-6

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of

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Basis:

The HCl scrubber controls emissions from the HCl Tank.

The scrubber is a once-through water scrubber with a design efficiency specification of a minimum of 99.9% control efficiency.

HCl Throughput = 377,985 gal/yr
Scrubber HCl Control Efficiency = 99.9 %
Operating Hours = 6720 hr

Calculations:

Tanks

Refer to the attached Tanks calculation sheets for the tank emission calculations.

Uncontrolled Emissions

Component	Average Emission Rate lb/hr	Maximum Emission Rate lb/hr	Daily Emission Rate lb/day	Annual Emission Rate tpy
HCl	0.0062	1.2528	0.15	0.03

Controlled Emissions

Component	Average Emission Rate lb/hr	Maximum Emission Rate lb/hr	Daily Emission Rate lb/day	Annual Emission Rate tpy
HCl	0.00001	0.0013	0.0001	0.00003

Summary:

Component	Average Emission Rate lb/hr	Maximum Emission Rate lb/hr	Daily Emission Rate lb/day	Annual Emission Rate tpy
HCl	0.00001	0.0013	0.0001	0.00003

American Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	Tank Service	UTM Coordinates		Constr. Start Date	Annual Operating Hours	Tank Orientation	Shell Diam	Shell Height	Shell Length	Equiv Horiz Diam
				mE	mN							
D3-7		Resin Acid Wash Tank	5% HCl				6720	1	10	22	-	-
D3-8		CIP Tank	5% HCl				6720	1	5	5	-	-
D3-9a		Deashing Resin Bed #1	5% HCl				6720	1	12	20	-	-
D3-9b		Deashing Resin Bed #2	5% HCl				6720	1	12	20	-	-
D3-9c		Deashing Resin Bed #3	5% HCl				6720	1	12	20	-	-
D3-9d		Deashing Resin Bed #4	5% HCl				6720	1	12	20	-	-
D3-10a		Decolorized Resin Bed #1	5% HCl				6720	1	14	29	-	-
D3-10b		Decolorized Resin Bed #2	5% HCl				6720	1	14	29	-	-
D3-10c		Decolorized Resin Bed #3	5% HCl				6720	1	14	29	-	-
D3-10d		Decolorized Resin Bed #4	5% HCl				6720	1	13	25	-	-
D3-13a		Neutralization Tank #1	5% HCl				6720	1	13	25	-	-
D3-13b		Neutralization Tank #2	5% HCl				6720	1	13	25	-	-
D3-13c		Neutralization Tank #3	5% HCl				6720	1	13	25	-	-

American Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	Is Tank Constant Level?	Liquid Height	Roof Type	Cone Roof Slope	Dome Radius	Vapor Space Outage	2021 Annual Throughput	Turnovers	Maximum Fill Rate	Will Tank Have Breather Vents?
			(YES/NO)	"H _L ", (ft)	FLAT CONE or DOME?	"S _R ", (ft/ft)	"R _R ", (ft)	"H _{VO} ", (ft)	Q, (gals)	"N"	(gals/min)	(YES/NO)
D3-7		Resin Acid Wash Tank	NO	11	CONE	0.0625		11.10	3,855	0	125	NO
D3-8		CIP Tank	NO	2.5	DOME		2.5	2.84	12,474	17	25	NO
D3-9a		Deashing Resin Bed #1	NO	10	FLAT			10.00	302,388	18	125	NO
D3-9b		Deashing Resin Bed #2	NO	10	FLAT			10.00	302,388	18	125	NO
D3-9c		Deashing Resin Bed #3	NO	10	FLAT			10.00	302,388	18	125	NO
D3-9d		Deashing Resin Bed #4	NO	10	FLAT			10.00	302,388	18	125	NO
D3-10a		Decolorized Resin Bed #1	NO	14.5	FLAT			14.50	302,388	9	125	NO
D3-10b		Decolorized Resin Bed #2	NO	14.5	FLAT			14.50	302,388	9	125	NO
D3-10c		Decolorized Resin Bed #3	NO	14.5	FLAT			14.50	302,388	9	125	NO
D3-10d		Decolorized Resin Bed #4	NO	14.5	FLAT			14.50	302,388	9	125	NO
D3-13a		Neutralization Tank #1	NO	12.5	FLAT			12.50	755,970	30	125	NO
D3-13b		Neutralization Tank #2	NO	12.5	FLAT			12.50	755,970	30	125	NO
D3-13c		Neutralization Tank #3	NO	12.5	FLAT			12.50	755,970	30	125	NO

American Sugar Refining HCl Tanks - Baltimore Refinery

A

Pt. Source No.	MDE Regis. No.	Tank ID No.	Breather Vent Pressure Setting "P _{BP} ", psig	Breather Vent Vacuum Setting "P _{BV} ", psig	Tank Shell Color	Tank Roof Color	Tank Paint Cond	Paint Factor	Does Tank Vent to Control Device	Control Device Efficiency (%)	Tank Contents
D3-7		Resin Acid Wash Tank	0	0	RED	RED	GOOD	0.89		0	HCl (5%)
D3-8		CIP Tank	0	0	AL SPEC	AL MILL	GOOD	0.1		0	HCl (5%)
D3-9a		Deashing Resin Bed #1	0	0	AL SPEC	AL MILL	GOOD	0.1		0	HCl (5%)
D3-9b		Deashing Resin Bed #2	0	0	AL SPEC	AL MILL	GOOD	0.1		0	HCl (5%)
D3-9c		Deashing Resin Bed #3	0	0	AL SPEC	AL MILL	GOOD	0.1		0	HCl (5%)
D3-9d		Deashing Resin Bed #4	0	0	AL SPEC	AL MILL	GOOD	0.1		0	HCl (5%)
D3-10a		Decolorized Resin Bed #1	0	0	AL SPEC	AL MILL	GOOD	0.1		0	HCl (5%)
D3-10b		Decolorized Resin Bed #2	0	0	AL SPEC	AL MILL	GOOD	0.1		0	HCl (5%)
D3-10c		Decolorized Resin Bed #3	0	0	AL SPEC	AL MILL	GOOD	0.1		0	HCl (5%)
D3-10d		Decolorized Resin Bed #4	0	0	AL SPEC	AL MILL	GOOD	0.1		0	HCl (5%)
D3-13a		Neutralization Tank #1	0	0	AL SPEC	AL MILL	GOOD	0.1		0	HCl (5%)
D3-13b		Neutralization Tank #2	0	0	AL SPEC	AL MILL	GOOD	0.1		0	HCl (5%)
D3-13c		Neutralization Tank #3	0	0	AL SPEC	AL MILL	GOOD	0.1		0	HCl (5%)

merican Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	Wt. %	Mol. Wt.	Mole Fract.	A	B	C	Daily Avg. Liq. Surface Temp	Daily Max. Liq. Surface Temp	Daily Min. Liq. Surface Temp	P.Press of Comp 1 @ Daily Avg. Liq. Surface Temp
D3-7		Resin Acid Wash Tank	100	36.5	1				580.0	591.6	568.4	0.0003
D3-8		CIP Tank	100	36.5	1				580.0	584.5	575.5	0.0003
D3-9a		Deashing Resin Bed #1	100	36.5	1				580.0	584.5	575.5	0.0003
D3-9b		Deashing Resin Bed #2	100	36.5	1				580.0	584.5	575.5	0.0003
D3-9c		Deashing Resin Bed #3	100	36.5	1				580.0	584.5	575.5	0.0003
D3-9d		Deashing Resin Bed #4	100	36.5	1				580.0	584.5	575.5	0.0003
D3-10a		Decolorized Resin Bed #1	100	36.5	1				580.0	584.5	575.5	0.0003
D3-10b		Decolorized Resin Bed #2	100	36.5	1				580.0	584.5	575.5	0.0003
D3-10c		Decolorized Resin Bed #3	100	36.5	1				580.0	584.5	575.5	0.0003
D3-10d		Decolorized Resin Bed #4	100	36.5	1				580.0	584.5	575.5	0.0003
D3-13a		Neutralization Tank #1	100	36.5	1				580.0	584.5	575.5	0.0003
D3-13b		Neutralization Tank #2	100	36.5	1				580.0	584.5	575.5	0.0003
D3-13c		Neutralization Tank #3	100	36.5	1				580.0	584.5	575.5	0.0003

American Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	Vap. Press. Daily Avg. Liq. Surface Temp	"P _{va} " psia	Mol. Wt. Of Vapor @ Daily Avg. Liq. Surface Temp "M _v "	P.Press of Comp 1 @ Daily Max. Liq. Surface Temp psia	Vap. Press. Daily Max. Liq. Surface Temp "P _x ", psia	P.Press of Comp 1 @ Daily Min. Liq. Surface Temp psia	Vap. Press. Daily Min. Liq. Surface Temp "P _{LN} ", psia	Vap. Press. Range "DP _v ", psia	Vapor Space Volume "V _v ", (ft ³)
D3-7		Resin Acid Wash Tank	0.0003	0.0003	36.5	0.0005	0.0005	0.0001	0.0001	0.0004	872.12
D3-8		CIP Tank	0.0003	0.0003	36.5	0.0003	0.0003	0.0002	0.0002	0.0001	55.81
D3-9a		Deashing Resin Bed #1	0.0003	0.0003	36.5	0.0003	0.0003	0.0002	0.0002	0.0001	1130.97
D3-9b		Deashing Resin Bed #2	0.0003	0.0003	36.5	0.0003	0.0003	0.0002	0.0002	0.0001	1130.97
D3-9c		Deashing Resin Bed #3	0.0003	0.0003	36.5	0.0003	0.0003	0.0002	0.0002	0.0001	1130.97
D3-9d		Deashing Resin Bed #4	0.0003	0.0003	36.5	0.0003	0.0003	0.0002	0.0002	0.0001	1130.97
D3-10a		Decolorized Resin Bed #1	0.0003	0.0003	36.5	0.0003	0.0003	0.0002	0.0002	0.0001	2232.10
D3-10b		Decolorized Resin Bed #2	0.0003	0.0003	36.5	0.0003	0.0003	0.0002	0.0002	0.0001	2232.10
D3-10c		Decolorized Resin Bed #3	0.0003	0.0003	36.5	0.0003	0.0003	0.0002	0.0002	0.0001	2232.10
D3-10d		Decolorized Resin Bed #4	0.0003	0.0003	36.5	0.0003	0.0003	0.0002	0.0002	0.0001	2232.10
D3-13a		Neutralization Tank #1	0.0003	0.0003	36.5	0.0003	0.0003	0.0002	0.0002	0.0001	1659.15
D3-13b		Neutralization Tank #2	0.0003	0.0003	36.5	0.0003	0.0003	0.0002	0.0002	0.0001	1659.15
D3-13c		Neutralization Tank #3	0.0003	0.0003	36.5	0.0003	0.0003	0.0002	0.0002	0.0001	1659.15

American Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	Vapor Density	Vapor Space Expansion Factor	Vented Vapor Saturation Factor	Standing Storage Loss	Vapor Molecular Weight	Vap. Press. Daily Avg. Liq. Surface Temp.	Maximum Annual Throughput	Turnover Factor
			"W _V ", (lb/ft ³)	"K _E "	"K _S "	"L _S ", (lbs/yr)	"M _V ", (lb/lb-mole)	"P _{VA} ", (psia)	"Q", (bbls.)	"K _N "
D3-7		Resin Acid Wash Tank	0.000002	0.080	1.000	0.04	36.5	0.0003	92	1
D3-8		CIP Tank	0.000002	0.031	1.000	0.001	36.5	0.0003	297	1
D3-9a		Deashing Resin Bed #1	0.000002	0.031	1.000	0.02	36.5	0.0003	7200	1
D3-9b		Deashing Resin Bed #2	0.000002	0.031	1.000	0.02	36.5	0.0003	7200	1
D3-9c		Deashing Resin Bed #3	0.000002	0.031	1.000	0.02	36.5	0.0003	7200	1
D3-9d		Deashing Resin Bed #4	0.000002	0.031	1.000	0.02	36.5	0.0003	7200	1
D3-10a		Decolorized Resin Bed #1	0.000002	0.031	1.000	0.04	36.5	0.0003	7200	1
D3-10b		Decolorized Resin Bed #2	0.000002	0.031	1.000	0.04	36.5	0.0003	7200	1
D3-10c		Decolorized Resin Bed #3	0.000002	0.031	1.000	0.04	36.5	0.0003	7200	1
D3-10d		Decolorized Resin Bed #4	0.000002	0.031	1.000	0.04	36.5	0.0003	7200	1
D3-13a		Neutralization Tank #1	0.000002	0.031	1.000	0.03	36.5	0.0003	17999	1
D3-13b		Neutralization Tank #2	0.000002	0.031	1.000	0.03	36.5	0.0003	17999	1
D3-13c		Neutralization Tank #3	0.000002	0.031	1.000	0.03	36.5	0.0003	17999	1

American Sugar Refining HCl Tanks - Baltimore Refinery

Pt. Source No.	MDE Regis. No.	Tank ID No.	Working Loss Product Factor	Working Loss "L _w ", (lbs/yr)	Avg Hourly Rate (lbs/hr)	Max Hourly Rate (lbs/hr)	Total Loss (lbs/yr)	Total Loss (tpy)	Total Loss Comp 1	Tank ID No.
D3-7		Resin Acid Wash Tank	"K _p " 1	0.0	0.000006	0.0034	0.0	0.000020	0.04014	Resin Acid Wash Tank
D3-8		CIP Tank	1	0.0	0.000001	0.0004	0.0	0.000002	0.00383	CIP Tank
D3-9a		Deashing Resin Bed #1	1	0.1	0.000013	0.0022	0.1	0.000044	0.089	Deashing Resin Bed #1
D3-9b		Deashing Resin Bed #2	1	0.1	0.000013	0.0022	0.1	0.000044	0.089	Deashing Resin Bed #2
D3-9c		Deashing Resin Bed #3	1	0.1	0.000013	0.0022	0.1	0.000044	0.089	Deashing Resin Bed #3
D3-9d		Deashing Resin Bed #4	1	0.1	0.000013	0.0022	0.1	0.000044	0.089	Deashing Resin Bed #4
D3-10a		Decolorized Resin Bed #1	1	0.1	0.000016	0.0022	0.1	0.000054	0.10812	Decolorized Resin Bed #1
D3-10b		Decolorized Resin Bed #2	1	0.1	0.000016	0.0022	0.1	0.000054	0.10812	Decolorized Resin Bed #2
D3-10c		Decolorized Resin Bed #3	1	0.1	0.000016	0.0022	0.1	0.000054	0.10812	Decolorized Resin Bed #3
D3-10d		Decolorized Resin Bed #4	1	0.1	0.000016	0.0022	0.1	0.000054	0.10812	Decolorized Resin Bed #4
D3-13a		Neutralization Tank #1	1	0.2	0.000030	0.0022	0.2	0.000101	0.20221	Neutralization Tank #1
D3-13b		Neutralization Tank #2	1	0.2	0.000030	0.0022	0.2	0.000101	0.20221	Neutralization Tank #2
D3-13c		Neutralization Tank #3	1	0.2	0.000030	0.0022	0.2	0.000101	0.20221	Neutralization Tank #3

Summary

Pt. Source No.	MDE Regis. No.	Tank ID No.	Compound 1	Average Emissions (lbs/hr)	Maximum Emissions (lbs/hr)	Annual Emissions (tpy)
D3-7		Resin Acid Wash Tank	HCl (5%)	0.000006	0.0034	0.000020
D3-8		CIP Tank	HCl (5%)	0.000001	0.0004	0.000002
D3-9a		Deashing Resin Bed #1	HCl (5%)	0.000013	0.0022	0.000044
D3-9b		Deashing Resin Bed #2	HCl (5%)	0.000013	0.0022	0.000044
D3-9c		Deashing Resin Bed #3	HCl (5%)	0.000013	0.0022	0.000044
D3-9d		Deashing Resin Bed #4	HCl (5%)	0.000013	0.0022	0.000044
D3-10a		Decolorized Resin Bed #1	HCl (5%)	0.000016	0.0022	0.000054
D3-10b		Decolorized Resin Bed #2	HCl (5%)	0.000016	0.0022	0.000054
D3-10c		Decolorized Resin Bed #3	HCl (5%)	0.000016	0.0022	0.000054
D3-10d		Decolorized Resin Bed #4	HCl (5%)	0.000016	0.0022	0.000054
D3-13a		Neutralization Tank #1	HCl (5%)	0.000030	0.0022	0.000101
D3-13b		Neutralization Tank #2	HCl (5%)	0.000030	0.0022	0.000101
D3-13c		Neutralization Tank #3	HCl (5%)	0.000030	0.0022	0.000101

AMERICAN SUGAR REFINING, INC.-BALTIMORE DOMINO SUGAR REFINERY

Source Description: SALT SATURATOR

MDE Registration No.:

Point Source ID No.: D3-11

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Basis:

Point source emits PM, PM10, and PM2.5.

Salt is conveyed pneumatically to the salt saturator tank. Particulate emissions carried over by the air stream are vented to a seal pot which is conservatively estimated to control the particulate emissions by 90%.

As no emission factors exist for salt transfer, the emission factor is based on the transfer of sodium carbonate from AP-42 5th Ed., Section 8.12, Table 8.12-2, as salt and sodium carbonate would be similar in nature. Only the filterable fraction factor is used as no condensable fraction would be expected.

PM, PM10, and PM2.5 are conservatively assumed to be the same.

Salt Throughput =	6,472,780 lb/yr =	3,236.39 ton/yr
Max Salt Transfer Rate =	2700 lb/hr =	1.35 ton/hr
Seal Pot Control Efficiency =	95 %	
Operating Hours =	3360 hr	

Calculations:

PM Emissions

Emission Factor =	0.0041 lb TSP/ton salt processed
Control Efficiency=	95 %

PM Emissions = Process rate, ton/yr x Emission Factor, lb TSP/ton x (1-Cont. Eff.) / 3648 hr/yr

= 3236 ton salt/yr x 0.0041 lb PM/ton salt x (1 - 0.95) / 3360 hr/yr
 = 0.0002 lb/hr
 = 0.000332 tpy

Max PM Emissions = 1.35 ton/hr x 0.0041 lb/ton x (1 - 0.95)
 = 0.0003 lb/hr

AMERICAN SUGAR REFINING, INC.-BALTIMORE DOMINO SUGAR REFINERY

Source Description: SALT SATURATOR

MDE Registration No.:

Point Source ID No.: D3-11

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PM10 Emissions

Emission Factor = 0.0041 lb PM10/ton salt processed
Control Efficiency= 95 %

PM10 Emissions = Process rate, ton/yr x Emission Factor, lb PM10/ton x (1-Cont. Eff.) / 3648 hr/yr

= 3236 ton salt/yr x 0.0041 lb PM10/ton salt x (1 - 0.95) / 3360 hr/yr
= 0.0002 lb/hr
= 0.000332 tpy

Max PM Emissions = 1.35 ton/hr x 0.0041 lb/ton x (1 - 0.95)
= 0.0003 lb/hr

PM2.5 Emissions

Emission Factor = 0.0041 lb PM2.5/ton salt processed
Control Efficiency= 95 %

PM2.5 Emissions = Process rate, ton/yr x Emission Factor, lb PM2.5/ton x (1-Cont. Eff.) / 3648 hr/yr

= 3236 ton salt/yr x 0.0041 lb PM2.5/ton salt x (1 - 0.95) / 3360 hr/yr
= 0.0002 lb/hr
= 0.000332 tpy

Max PM Emissions = 1.35 ton/hr x 0.0041 lb/ton x (1 - 0.95)
= 0.0003 lb/hr

Summary:

Component	Average Emission Rate lb/hr	Maximum Emission Rate lb/hr	Daily Emission Rate lb/day	Annual Emission Rate tpy
PM	0.000197	0.000277	0.001818	0.000332
PM10	0.000197	0.000277	0.001818	0.000332
PM2.5	0.000197	0.000277	0.001818	0.000332

AMERICAN SUGAR REFINING, INC.-BALTIMORE DOMINO SUGAR REFINERY

Source Description: HCL PIPING FUGITIVE EMISSIONS

MDE Registration No.:

Point Source ID No.: D3-12

Page

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of

1

Basis:

Fugitive emissions from equipment components in the HCl storage system emits hydrochloric acid. Emission factors are the Marketing Terminal Average Factors from Protocol for Equipment Leak Estimates (EPA 453/R-95-017, November 1995). Due to the general intermittent operational nature of the components, the lack of operational conditions associated with those of a SOCMI operation, and the use of an olfactory/visual/audible monitoring program to detect leaks, these factors are the most suitable for these equipment components.

Calculations:

2021 Operating Hours: 6720

31.45% HCl

Equipment	Service	Component Count	SOCMI Average Factor kg/hr/src	Emission Rate lb/hr	Total Emissions lb/yr
Valves	Lt. Liquid	13	4.30E-05	0.001232	8.28
	Gas		1.30E-05	0.000000	0.00
Pump Seals	Lt. Liquid	1	5.40E-04	0.001190	8.00
Connectors	Lt. Liquid	35	8.00E-06	0.000617	4.15
	Gas		4.20E-05	0.000000	0.00
Total:				0.003040	20.43

Speciation

HCl

31.45 %

HCl Emissions = 0.0010 lb/hr

HCl Emissions = 6.43 lb/yr

AMERICAN SUGAR REFINING, INC.-BALTIMORE DOMINO SUGAR REFINERY

Source Description: HCL PIPING FUGITIVE EMISSIONS

MDE Registration No.:

Point Source ID No.: D3-12

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of

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5% HCl

Equipment	Service	Component Count	SOCMI Average Factor kg/hr/src	Emission Rate lb/hr	Total Emissions lb/yr
Valves	Lt. Liquid	74	4.30E-05	0.007015	47.14
	Gas		1.30E-05	0.000000	0.00
Pump Seals	Lt. Liquid		5.40E-04	0.000000	0.00
Connectors	Lt. Liquid	185	8.00E-06	0.003263	21.93
	Gas		4.20E-05	0.000000	0.00
Total:				0.010278	69.07

Speciation

HCl

5.00 %

HCl Emissions = 0.0005 lb/hr

HCl Emissions = 3.45 lb/yr

Summary:

Component	Average Emission Rate lb/hr	Maximum Emission Rate lb/hr	Daily Emission Rate lb/day	Annual Emission Rate tpy
Hydrochloric Acid	0.001	0.001	0.027	0.005

Screening Analysis for Hydrochloric Acid per COMAR 26.11.16.02A(4)

Considers shorter stacks, possible downwash, or fugitive emission rates from COMAR 26.11.16.02A(4)

Source	Total Premises Emissions lb/yr	Total Premises Emissions lb/day (Actual)	Total Premises Emissions Tons/yr (Actual)	Maximum Premises Emissions lb/hr
D3-6	0.054	0.0001945	4.05213E-09	0.0013
D3-7	0.040	0.00014336	2.98677E-09	0.0034
D3-8	0.004	1.368E-05	2.85003E-10	0.0004
D3-9a	0.089	0.00031786	6.62201E-09	0.0022
D3-9b	0.089	0.00031786	6.62201E-09	0.0022
D3-9c	0.089	0.00031786	6.62201E-09	0.0022
D3-9d	0.089	0.00031786	6.62201E-09	0.0022
D3-10a	0.108	0.00038616	8.04491E-09	0.0022
D3-10b	0.108	0.00038616	8.04491E-09	0.0022
D3-10c	0.108	0.00038616	8.04491E-09	0.0022
D3-10d	0.108	0.00038616	8.04491E-09	0.0022
D3-12	9.879	0.03528042	7.35009E-07	0.0015
D3-13a	0.202	0.00072216	1.50451E-08	0.0022
D3-13b	0.202	0.00072216	1.50451E-08	0.0022
D3-13c	0.202	0.00072216	1.50451E-08	0.0022
TOTAL	11.372	0.041	8.5E-07	0.031

hours of operation IX: 6720
days of operation: 280

Annual Screening Level ug/m ³	Premises Emission Rate lb/yr	8-hr Screening Level ug/m ³	Premises Emission Rate lb/hr	1-hr Screening Level ug/m ³	Premises Emission Rate lb/hr
0.7	36.52	165.27	0.46	29.83	0.04
Yes		Yes		Yes	

Pass Screening?

ATTACHMENT C ANNUAL COMPLIANCE CERTIFICATION 2021



American Sugar Refining, Inc.
1100 Key Highway East
Baltimore, MD 21230

March 31, 2022

Maryland Department of the Environment
Air and Radiation Management Administration
1800 Washington Boulevard, Suite 715
Baltimore, Maryland 21230-1720
Attention: Laramie Daniel, Compliance Program

Subject: Part 70 Compliance Certification Report for 2021
Title V Operating Permit No. 24-510-0314

Dear Ms. Daniel:

Enclosed are two (2) copies of the American Sugar Refining, Inc. (ASR) - Domino Sugar Refinery's 2021 Annual Part 70 Compliance Certification Report. This report is mandated by the site's Title V Operating Permit No. 24-510-0314, which was issued on November 1, 2018.

Please find the following enclosed information:

- Certification of Truth, Accuracy, and Completeness (CTAC Form 5900-02)
- Certification of Plant Wide Conditions (ARMA Form; Section III of Part 70 Operating Permit)
- Certification of each Permit Term and Condition (A-Comp Form 5900-04; Section IV of Part 70 Operating Permit).

Should you have any questions or concerns regarding this report or if you require further information, please call me at (410) 783-8687 or karen.bakker@asr-group.com.

Warm regards,

A handwritten signature in blue ink that reads 'Karen A. Bakker'.

Karen Bakker
EHS Manager

cc: Associate Director, US EPA Region III
Air Protection Division
Office of Enforcement and Permit Review (3AP10)
1650 Arch Street
Philadelphia, PA 19103-2029

And, electronically to: R3_APD_Permits@epa.gov

Federal Operating Permit Program (40 CFR Part 71)
CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) White (First) Coricka (MI) V.

Title Plant Manager

Street or P.O. Box 1100 Key Highway East

City Baltimore State MD ZIP 21230 - 5180

Telephone (410) 951 - 5728 Ext. Facsimile (410) 783 - 8612

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) Coricka V. White

Name (typed) Coricka V. White Date: 3, 31, 2022

**INSTRUCTIONS FOR CTAC
CERTIFICATION OF TRUTH, ACURACY, and COMPLETENESS**

Information Collection Burden Estimates

The public reporting and recordkeeping burden for this collection of information is estimated to average 247 hours per respondent per year. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

DETAILED INSTRUCTIONS

This form is for the responsible official to certify that submitted documents (i.e., permit applications, updates to application, reports, and any other information required to be submitted as a condition of a permit) are true, accurate, and complete.

This form should be completed and submitted with each set of documents sent to the permitting authority. It may be used at time of initial application, at each step of a phased application submittal, for application updates, as well as to accompany routine submittals required as a term or condition of a permit.

Section A - Title V permit applications must be signed by a responsible official. The definition of responsible official can be found at 40 CFR 70.2.

Section B - The responsible official must sign and date the certification of truth, accuracy and completeness. This should be done after all application forms are complete and the responsible official has reviewed the information. Normally this would be the last form completed before the package of forms is mailed to the permitting authority.

CERTIFICATION OF PLANT-WIDE CONDITIONS
(SECTION III OF PART 70 OPERATING PERMIT)

Indicate compliance with the following requirements of Section III of your Part 70 Operating Permit in the space provided below:

1. Particulate Matter from Construction and Demolition

In compliance during 2021.

2. Open Burning

In compliance during 2021.

3. Air Pollution Episode

Not applicable. In compliance during 2021.

4. Report of Excess Emissions and Deviations

As documented in an April 28, 2021 written report of excess emissions, a fire occurred in the Raw Sugar Shed at the American Sugar Refining, Inc. (ASR) facility located at 1100 Key Highway East in Baltimore, Maryland at approximately 3:00 p.m. on April 20, 2021. The fire was brought under control after several hours, with the Baltimore City Fire Department working hot spot flare ups through April 24, 2021.

The initial verbal notification of this incident was made directly to the Maryland Department of the Environment (MDE) via telephone call on April 20, 2021 and is documented in Report No. 118-699.

The cause of the fire was considered to be accidental. The fire was contained to the Raw Sugar Shed, including conveyor belts RSB-6 and RSB-9 and shuttle belt RSS-3. The Raw Sugar Shed was a metal hangar-type structure (with no insulation). The main content of the building was raw sugar cane. The belts were constructed of metal, with rubber conveyors. It is believed that a bad bearing associated with a conveyor was the cause of the fire.

ASR performed a clean-up of the remains of the fire to reduce the potential for further excess emissions. ASR also conducted a full investigation of the fire and its causes. The results of the investigation were used to allow ASR to determine appropriate actions to reduce, eliminate, and prevent recurrence of this type of event.

As part of the recovery from the fire, the Maryland Department of the Environment granted approval on April 28, 2021 and subsequently on May 4, 2021 for the emergency use of a series of conveyors to move the remaining raw sugar stockpiles from the base of the burned-out Raw Sugar Shed to enclosed barges. This process was run from April 28, 2021 through May 7, 2021. The emissions from this movement are included in the 2021 Air Emissions Inventory for the site.

5. Accidental Release Provisions (if applicable)

In compliance during 2021, as the facility is not subject to 40 CFR 68.

6. General Testing Requirements

In compliance during 2021, with all general testing requirements executed in accordance with the permit for Boilers 1, 2, 3, 4, and 6.

7. Emissions Test Methods

In compliance during 2021, with only designated and approved test methods used.

8. Emission Certification Report

In compliance during 2021, with timely submittal of reports.

9. Compliance Certification Report

In compliance during 2021, with timely submittal of reports.

10. Certification by Responsible Official

In compliance during 2021, with all reports certified by the Plant Manager with the required language.

11. Sampling and Emissions Testing Record Keeping

In compliance during 2021, with emissions sampling and testing records with the required information being retained.

12. General Record Keeping

In compliance during 2021, with the required records and supporting information being retained.

13. General Conformity

Not applicable, as this applies to federal facilities.

14. Asbestos Provisions (if applicable)

In compliance during 2021, with all renovations and demolitions performed in compliance with all applicable regulations.

15. Ozone Depleting Regulations (if applicable)

In compliance during 2021 with 40 CFR 82, Subpart F requirements.

16. Acid Rain Permit (if applicable)

Not applicable.

Federal Operating Permit Program (40 CFR Part 71)
ANNUAL COMPLIANCE CERTIFICATION (A-COMP)

A. GENERAL INFORMATION

Permit No. 24-510-0314

Reporting Period: Beg. 01/01/2021 End. 12/31/2021

Source / Company Name American Sugar Refining, Inc.

Mailing Address: Street or P.O. Box 1100 Key Highway East

City Baltimore State Maryland ZIP 21230 - 5180

Contact person Karen Bakker Title Environmental Manager

Telephone (410) 783 - 8687 Ext.

Continued on next page

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): C1, C2, C3, C4 – Four (4) Combustion Engineering Boilers each rated at 130 MMBtu/hr firing natural gas and fuel oil (No. 2 or No. 6) (only during periods of natural gas curtailment), and each equipped with an ultra-low NO_x burner.

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 1

1.1. Applicable Standards/Limits:

A. Control of Visible Emissions

- (1) COMAR 26.11.09.05 A(2) - Visible Emissions. "Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity."

COMAR 26.11.09.05 A(3) - Exceptions. "Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period."

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 1

1.2 Testing Requirements

A. Control of Visible Emissions

During stack testing periods, the Permittee shall conduct an opacity observation of the exhaust gases exiting the stack for a period of at least one hour in order to demonstrate compliance with the no visible emissions requirement of COMAR 26.11.09.05A(2) when burning fuel oil (No. 2 or No. 6). The opacity observation shall be conducted in accordance with US EPA Method 9, Method 22 or an equivalent method approved by the Department. [Reference: COMAR 26.11.03.06C & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

Plant Specific Conditions; Section IV

Table IV – 1

1.3 Monitoring Requirements:

A. Control of Visible Emissions

The Permittee shall: properly operate and maintain the boilers in a manner to prevent visible emissions; and verify no visible emissions when burning fuel oil (No. 2 or No. 6). The Permittee shall perform a visual observation for a 6-minute once for each 168-hour period when the boiler burns fuel oil. If a boiler does not burn fuel oil for more than 100 hours in a calendar year, the visible emission observation requirement is waived for that boiler.

The Permittee shall perform the following, if visible emissions are observed: inspect combustion system and boiler operation; perform all necessary adjustments and/or repairs to the boiler within 48 hours so that visible emissions are eliminated; document in writing the results of inspections, adjustments, and/or repair to the boiler; and after 48 hours, if required adjustments and/or repair had not eliminated the visible emissions, perform a Method 9 observation for a 18-minute period once per day until corrective actions have eliminated the visible emissions. [Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV – 1

1.4 Record Keeping Requirements:

A. Control of Visible Emissions

The Permittee shall maintain an operational manual and preventive maintenance plan on site; maintain the test result of the Method 9 performed; maintain records of the results of the monthly inspections; maintain a record of the maintenance performed that relates to combustion performance; maintain a log of visible emissions observations performed and make it available to the Department upon request; maintain a record of the hours that fuel oil (No. 2 or No. 6) is burned. [Reference: COMAR 26.11.03.06C].

Plant Specific Conditions; Section IV

Table IV – 1

1.5 Reporting Requirements:

A. Control of Visible Emissions

The Permittee shall report, in accordance with requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Management Administration.

Status (Check one): ☒ (11/16/21 issue at C1) Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): C1, C2, C3, C4 – Four (4) Combustion Engineering Boilers each rated at 130 MMBtu/hr firing natural gas and fuel oil (No. 2 or No. 6) (only during periods of natural gas curtailment), and each equipped with an ultra-low NO_x burner.

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 1

1.1. Applicable Standards/Limits:

B. Control Particulate Matter

- (1) COMAR 26.11.09.06B(1)(a) – Control of Particulate Matter - Areas III and IV – Dust Collector Devices Required. "A person may not cause or permit the combustion of residual fuel oil in fuel burning equipment unless the equipment is fitted with a dust collector which is so designed that it can reasonably be expected to produce sufficient dust particle force, residence time, and particle retention to satisfy the requirements of Table 1. This paragraph does not apply to fuel burning equipment where by-product gases or by-product gases in combination with residual fuel oil are burned and where the effluent gases do not contain particulate matter in excess of the requirements of Table 1, as applicable to residual oil burning."
- (2) COMAR 26.11.09.06B(2) Control of Particulate Matter - Areas III and IV - Residual Fuel-Oil-Burning Equipment. "A person may not cause or permit particulate matter caused by the combustion of residual fuel oil to be discharged into the atmosphere in excess of the amounts shown in Table 1."
- (3) COMAR 26.11.09.09: Table 1 - Emission Standards and Dust Collector Performance Standards for Fuel-Burning Equipment

Table 1 Emission Standards and Dust Collector Performance Standards for Fuel-Burning Equipment		
Equipment Description	Max. Rated Heat Input in million Btu (gigajoules) per hour per furnace	Max. Allowable Emissions of Part. Matter – gr/scfd (mg/dscm)
Existing and new equipment burning residual oil	Less than 13 (13.7)	No requirement (a)
	13 – 50 (13.7 – 52.8)	0.03 (69)
	50 – 250 (52.8 – 265)	0.020 (46)

- (4) No. 6 fuel oil is limited to a maximum of 0.068% ash content. [Reference: MDE letter dated November 8, 2005 & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 1

1.2 Testing Requirements

B. Control of Particulate Matter

Stack emissions tests shall be conducted at least once every two-year period to demonstrate compliance with the 0.020 gr/scfd particulate matter emission limit when the boiler burns fuel oil (No. 2 or No. 6) with a pre-determined ash content weight percent.

Stack emissions tests shall be conducted to demonstrate compliance with the 0.020 gr/scfd particulate matter emission limit can be achieved during either of the following operating conditions:

- (1) Burning only fuel oil (No. 2 or No. 6) with a pre-determined ash content weight percent in boilers 1 thru 4; and burning the lowest possible ratio of natural gas to fuel oil (No. 2 or No. 6) in boilers 1 through 4.
- (2) Boilers 1 through 4 shall each be operated at 90% or higher of their rated capacity during all stack emissions tests.

[Reference: COMAR 26.11.03.06C]

Note: The Permittee is not required to conduct stack testing on Boilers 1-4 when fuel oil (No. 2 or No. 6) has not been utilized at any time during the preceding two (2) years.

Plant Specific Conditions; Section IV

Table IV – 1

1.3 Monitoring Requirements:

B. Control of Particulate Matter

The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the fuel oil (No. 2 or No. 6) has an ash content equal to or less than 0.068% by weight. [Reference: MDE letter dated November 8, 2005 & COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV – 1

1.4 Record Keeping Requirements:

B. Control of Particulate Matter

The Permittee shall maintain records of all stack emissions test documents and the fuel supplier certification for each shipment of fuel oil (No. 2 or No. 6) stating the ash content in weight percent. [Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV – 1

1.5 Reporting Requirements:

B. Control of Particulate Matter

At least 30 days prior to the projected date of the stack emission test, the Permittee shall submit a test protocol to the Department for review and approval. Within 45 days after the emission test, the Permittee shall submit to the Department, a stack test report that includes the stack emissions test results and opacity observations results. [Reference: COMAR 26.11.03.06C]

Status (Check one): ☒ (3/31/21 & 12/16/21 stack testing) Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): C1, C2, C3, C4 – Four (4) Combustion Engineering Boilers each rated at 130 MMBtu/hr firing natural gas and fuel oil (No. 2 or No. 6) (only during periods of natural gas curtailment), and each equipped with an ultra-low NO_x burner.

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 1

1.1. Applicable Standards/Limits:

C. Control of Sulfur Oxides

(1) COMAR 26.11.09.07A(2) - Sulfur Content Limitations for Fuel. "A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: (2) In Areas III and IV:

- (a) Not applicable.
- (b) "Distillate fuel oils, 0.3 percent."
- (c) "Residual fuel oils, 1.0 percent."

(2) No. 6 fuel oil is limited to a maximum of 0.5% sulfur content. [Reference: MDE letter dated November 8, 2005 & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 1

1.2 Testing Requirements

C. Control of Sulfur Oxides

See Monitoring Requirements.

Plant Specific Conditions; Section IV

Table IV – 1

1.3 Monitoring Requirements:

C. Control of Sulfur Oxides

The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the No. 6 fuel oil has a sulfur content equal to or less than 0.5% by weight. [Reference: MDE letter dated November 8, 2005 & COMAR 26.11.03.06C]

The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the No. 2 fuel oil has a sulfur content equal to or less than 0.3% by weight. [Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV – 1

1.4 Record Keeping Requirements:

C. Control of Sulfur Oxides

The Permittee shall maintain records of the annual fuel supplier certifications stating that the No. 6 fuel oil used in Boilers 1 through 4 is in compliance with the 1.0% by weight sulfur limitation required by COMAR 26.11.09.07A(2)(c). [NOTE: Per November 8, 2005 letter from MDE, based on stack testing data, sulfur content of fuel oil is not to exceed 0.5%.]

The Permittee shall maintain records of the annual fuel supplier certifications stating that the No. 2 fuel oil used in Boilers 1 through 4 is in compliance with the 0.3% by weight sulfur limitation required by COMAR 26.11.09.07A(2)(b).

The Permittee shall maintain records of the certification from the supply company of all natural gas curtailment events, including date and duration of the event.

[Reference: MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

Plant Specific Conditions; Section IV

Table IV – 1

1.5 Reporting Requirements:

C. Control of Sulfur Oxides

The Permittee shall make records of certification from the supplier available to the Department upon request. [Reference: COMAR 26.11.03.06C]

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): C1, C2, C3, C4 – Four (4) Combustion Engineering Boilers each rated at 130 MMBtu/hr firing natural gas and fuel oil (No. 2 or No. 6) (only during periods of natural gas curtailment), and each equipped with an ultra-low NO_x burner.

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 1

1.1. Applicable Standards/Limits:

D. Control of Nitrogen Oxides

- (1) **COMAR 26.11.09.08B(1)(c) - Control of NO_x for Major Stationary Sources – Emissions Standards and Requirements.** "Emission Standards in Pounds of NO_x per Million Btu of heat input."

Fuel	Tangential-Fired	Wall-Fired
Gas only	0.20	0.20
Gas/Oil	0.25	0.25
Coal (dry bottom)	0.38	0.38
Coal (wet bottom)	1.00	1.00

- (2) **COMAR 26.11.09.08B(5) - Control of NO_x for Major Stationary Sources – Operator Training.**

(a) "For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.

(b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department."

- (3) **COMAR 26.11.09.08D(1)(b) - Requirements for Fuel-Burning Equipment with a Rated Heat Input Capacity of Less than 250 Million Btu Per Hour and Greater than 100 Million Btu Per Hour.** "All other fuel burning equipment with a rated heat input capacity of less than 250 Million Btu per hour and greater than 100 Million Btu per hour shall meet the NO_x emission rates set forth in §B(1)(c) of this regulation."

- (4) No. 6 fuel oil is limited to a maximum of 0.5% nitrogen content. [Reference: MDE letter dated November 8, 2005 & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 1

1.2 Testing Requirements

D. Control of Nitrogen Oxides

See Monitoring Requirements.

Plant Specific Conditions; Section IV

Table IV – 1

1.3 Monitoring Requirements:

D. Control of Nitrogen Oxides

The Permittee shall obtain an analysis from the fuel supplier of each load of oil received indicating that the oil has a nitrogen content equal to or less than 0.5% by weight. [Reference: MDE letter dated November 8, 2005 & COMAR 26.11.03.06C]

At a point in each stack prior to a point at which boiler flue gas combines with flue gas from any other boiler, the Permittee shall install and make operational, concurrent with commencement of operations of the Ultra-Low NO_x Burners, a NO_x continuous emissions monitoring system (CEMS) to monitor NO_x emissions in accordance with the requirements of 40 CFR Part 60. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(15) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

The required CEMS shall monitor and record the applicable NO_x Emission Rate for each boiler to demonstrate compliance with the established NO_x Emissions Rates and shall be continuously operated, except during CEMS breakdowns, repairs, calibration checks, and zero span adjustments. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(16) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

If the Permittee is unable to obtain emissions data from the CEMS because of a malfunction of the CEM for more than 2 hours in duration, the Permittee shall use the alternative measurement method approved by the Department and EPA. [Reference: COMAR 26.11.01.11B(4) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

A CEMS used to monitor a gas concentration shall record not less than four equally spaced data points per hour and automatically reduce data in terms of averaging times consistent with the applicable emission standard per COMAR 26.11.01.11D. [Reference: MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

All emissions of NO_x shall be measured by the CEMS. During any periods of time when any CEMS is inoperable or not measuring NO_x emissions from any boiler, the Permittee shall apply the missing data substitution procedures provided in 40 CFR Part 75, Subpart D. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(18) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

COMAR 26.11.01.11C – Quality Assurance for CEMS. "A CEM used to monitor a gas concentration shall meet the quality assurance criteria of 40 CFR Part 60, Appendix F, as amended, which is incorporated by reference, or, if applicable, the quality assurance criteria of 40 CFR Part 75, Appendix B, as amended."

Status (Check one): ☒ (Multiple CEMS Downtimes) Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): C1, C2, C3, C4 – Four (4) Combustion Engineering Boilers each rated at 130 MMBtu/hr firing natural gas and fuel oil (No. 2 or No. 6) (only during periods of natural gas curtailment), and each equipped with an ultra-low NO_x burner.

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 1

1.4 Record Keeping Requirements:

D. Control of Nitrogen Oxides

The Permittee shall maintain records of the following and make available to the Department upon request:

- (1) The fuel supplier certification for each shipment of fuel oil (No. 2 or No. 6) stating the nitrogen content in weight percent.
- (2) All training and combustion analysis records required by COMAR 26.11.09.08B(5).

[Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV – 1

1.5 Reporting Requirements:

D. Control of Nitrogen Oxides

- (1) The Permittee shall submit: a record of training program attendance for each operator to the Department upon request.
- (2) The Permittee shall comply with the CEM System Downtime Reporting Requirements of COMAR 26.11.01.11E as follows:
 - (a) All CEM system downtime that lasts or is expected to last more than 24 hours shall be reported to the Department by telephone before 10 a.m. of the first regular business day following the breakdown.
 - (b) The system breakdown report required by §E(1)(a) of this regulation shall include the reason, if known, for the breakdown and the estimated period of time that the CEM will be down. The owner or operator of the CEM shall notify the Department by telephone when an out-of-service CEM is back in operation and producing data that has met performance specifications for accuracy, reliability, and durability of acceptable monitoring systems, as provided in COMAR 26.11.31, and is producing data.
- (3) The Permittee shall comply with the CEM Data Reporting Requirements of COMAR 26.11.01.11E as follows:
 - (a) All test results shall be reported in a format approved by the Department.
 - (b) Certification testing shall be repeated when the Department determines that the CEM data may not meet performance specifications because of component replacement or other conditions that affect the quality of generated data.
 - (c) A quarterly summary report shall be submitted to the Department not later than 30 days following each calendar quarter. The report shall be in a format approved by the Department, and shall include the following:
 - (i) The cause, time periods, and magnitude of all emissions which exceed the applicable emission standards;
 - (ii) The source downtime including the time and date of the beginning and end of each downtime period and whether the source downtime was planned or unplanned;
 - (iii) The time periods and cause of all CEM downtime including records of any repairs, adjustments, or maintenance that may affect the ability of the CEM to meet performance specifications of emission data;
 - (iv) Quarterly totals of excess emissions, installation downtime, and CEM downtime during the calendar quarter;
 - (v) Quarterly quality assurance activities;
 - (vi) Daily calibration activities that include reference values, actual values, absolute or percent of span differences, and drift status; and
 - (vii) Other information required by the Department that is determined to be necessary to evaluate the data, to ensure that compliance is achieved, or to determine the applicability of this regulation.
 - (d) All information required by this regulation to be reported to the Department shall be retained and made available for review by the Department for a minimum of 2 years from the time the report is submitted."
- (4) The Permittee must report orally or by electronic or facsimile transmission to the U.S. EPA and MDE, no later than 24 hours after the Permittee knew or should have known of any violation of the District Court Consent Decree, any permit regulations, or any event that may pose an immediate threat to the public health or welfare or the environment.
- (5) The Permittee shall submit within 30 days following each January 1st and July 1st a semi-annual report to the U.S. EPA for the immediately preceding half-calendar year period. This report shall:
 - (a) Identify any and all dates on which the Permittee has installed, or describe the progress of installation of, each Ultra Low NO_x burner required for NO_x control, emission limits, CEMS, and monitoring requirements, and describe any problems encountered or anticipated during such installation, together with implemented or proposed solutions;
 - (b) Provide all CEMS data collected for each Boiler #1 through #4 including an explanation of any periods of CEMS downtime together with any missing data for which American Sugar applied missing data substitution procedures, under Section VI.B of the Consent Order.
 - (c) Demonstrate compliance with all applicable 30-day rolling average emission limits in Section V of the District Court Consent Decree.
 - (d) Describe the status of any operation and maintenance work relating to activities required under the District Court Consent Decree.

[Reference: MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

Status (Check one): ☒ (Multiple CEMS Downtimes) Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): C1, C2, C3, C4 – Four (4) Combustion Engineering Boilers each rated at 130 MMBtu/hr firing natural gas and fuel oil (No. 2 or No. 6) (only during periods of natural gas curtailment), and each equipped with an ultra-low NO_x burner.

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 1

1.1. Applicable Standards/Limits:

E. Operational Limitations

- (1) The Permittee shall operate the boilers such that the combined hours of operation for Boilers #1 through #4 do not exceed 20,220 hours in any consecutive 12-month period. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(12) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]
- (2) In accordance with COMAR 26.11.09.06B(2), particulate matter emissions from the stack that services Boilers #1 through #4 shall not exceed 0.020 grains per scfd (corrected to 50% excess oxygen). [Reference: MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]
- (3) In order to meet the 0.020 grains per scfd (corrected to 50% excess oxygen) particulate matter emissions limit of COMAR 26.11.09.06B(2), the Permittee shall:
 - (a) Use only fuel oil (No. 2 or No. 6) in Boilers #1 through #4 with an ash content weight percent that will not cause total particulate matter emissions from the single powerhouse stack to exceed 0.020 grains per scfd (corrected to 50% excess oxygen);
 - (b) Use natural gas and fuel oil (No. 2 or No. 6) in separate operating boilers that will not cause total particulate matter emissions from the single powerhouse stack to exceed 0.020 grains per scfd (corrected to 50% excess oxygen); or
 - (c) Install a dust collector device designed to meet the 0.020 grains per scfd (corrected to 50% excess oxygen) particulate matter emissions limit per COMAR 26.11.09.06B(1)(a). [Reference: MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]
- (4) The Permittee shall design and operate the ultra-low NO_x burners on Boilers 1-4 and the low NO_x burner on Boiler 6 to meet the emission rate of 500 lbs/day (or 624 lbs/day, when appropriate) on a 30-day rolling average. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Sections V(11)(a) & V(10)(d) & MDE Permit to Construct 510-5-1476 issued on August 28, 2014. Modified by the Order Modifying Consent Decree dated August 5, 2013 and the emission rates proposed in a letter to the EPA dated March 14, 2014 and approved by the EPA in a letter on April 2, 2014.]
- (5) The primary combined NO_x emission limit that applies to the operation of Boilers 1-4 and 6 is 500 lbs/day, calculated on a 30-day rolling average as described in the Order Modifying Consent Decree. This limit applies at all times, except in the circumstances described below when the limit of 624 lbs/day applies.
 - (a) Any day in which:
 - (1) Boiler 6 operates at any point in time;
 - (2) Boiler 6 operates in conjunction with any of the CE boilers; or
 - (3) Boiler 6 does not operate and only three (3) of the CE boilers operate would count toward the 500 lbs/day 30 day rolling average.
 - (b) If there are seven calendar days within a 30 day period in which Boiler 6 does not operate and each of the four CE boilers operates for some period of time in that calendar day, then the combined NO_x emission limit is 624 lbs/day. The seven days do not need to be consecutive.
 - (c) ASR will calculate the 30 day rolling average each day. If all four CE boilers operated for six days or less within the previous 30 calendar day period, the limit of 500 lbs/day applies. If all four CE boilers operated seven days or more during the previous 30-calendar day period, the limit of 624 lbs/day applies. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(11)(a) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014. Modified by the Order Modifying Consent Decree dated August 5, 2013 and the emission rates proposed in a letter to the EPA dated March 14, 2014 and approved by the EPA in a letter on April 2, 2014.]
- (6) The Permittee shall continuously operate the NO_x control technology at all times of boiler operation. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(11)(b) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]
- (7) The total combined NO_x emissions from Boilers 1-4 & 6 in any consecutive 12 month period shall not exceed 60 tons. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(13) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014. Modified by the Order Modifying Consent Decree dated August 5, 2013 and the emission rates proposed in a letter to the EPA dated March 14, 2014 and approved by the EPA in a letter on April 2, 2014.]
- (8) The total combined NO_x emissions from Boilers 1-4 & 6 in any calendar month shall not exceed 6.0 tons. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(14) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 1

1.2 Testing Requirements:

E. Operational Limitations

See Monitoring Requirements.

Status (Check one): ☒ (Multiple CEMS Downtimes) Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): C1, C2, C3, C4 – Four (4) Combustion Engineering Boilers each rated at 130 MMBtu/hr firing natural gas and fuel oil (No. 2 or No. 6) (only during periods of natural gas curtailment), and each equipped with an ultra-low NO_x burner.

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 1

1.3 Monitoring Requirements:

E. Operational Limitations

See Monitoring Requirements for Control of Nitrogen Oxides.

Plant Specific Conditions; Section IV

Table IV – 1

1.4 Record Keeping Requirements:

E. Operational Limitations

- (1) The Permittee shall maintain electronically for at least five (5) years, and shall make available to the Department upon request, records of the following information:
 - (a) Monthly fuel oil (No. 2 or No. 6) usage in gallons per month and the total fuel usage (No. 2 or No. 6) for the previous rolling 12-month period. [Reference: MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]
 - (b) To comply with the annual emissions cap, the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the total amount of NO_x emissions for the current month and the previous eleven months. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(20) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]
 - (c) To comply with the monthly emissions cap, the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the amount of NO_x emissions for each operating day during the month. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(21) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]
 - (d) All stack emissions test documents. [Reference: MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]
- (2) To comply with the limit on combined total hours of operation for Boilers #1 through #4, the Permittee shall maintain electronically for at least five years, and shall make available to the Department upon request, monitoring records of the hours of operation of each boiler. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(19) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014]

Plant Specific Conditions; Section IV

Table IV – 1

1.5 Reporting Requirements:

E. Operational Limitations

See Reporting Requirements for Control Nitrogen Oxides.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): C6 – One (1) Babcox and Wilcox boiler rated at 300 MMBtu/hr firing natural gas and equipped with a low NO_x burner and flue gas recirculation.

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 2

2.1. Applicable Standards/Limits:

A. Control of Visible Emissions

COMAR 26.11.09.05A(2) – Visible Emissions – Areas III and IV. "In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity."

COMAR 26.11.09.05A(3) - Exceptions. "Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period.

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 2

2.2 Testing Requirements:

A. Control of Visible Emissions

See Reporting Requirements.

Plant Specific Conditions; Section IV

Table IV – 2

2.3 Monitoring Requirements:

A. Control of Visible Emissions

See Reporting Requirements.

Plant Specific Conditions; Section IV

Table IV – 2

2.4 Recordkeeping Requirements:

A. Control of Visible Emissions

See Reporting Requirements.

Plant Specific Conditions; Section IV

Table IV – 2

2.5 Reporting Requirements:

A. Control of Visible Emissions

The Permittee shall report, in accordance with requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Management Administration.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): C6 – One (1) Babcox and Wilcox boiler rated at 300 MMBtu/hr firing natural gas and equipped with a low NO_x burner and flue gas recirculation.

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 2

2.1 Applicable Standards/Limits:

B. Control of Nitrogen Oxides

- (1) COMAR 26.11.09.08B(1)(a), Control of NO_x Emissions for Major Stationary Sources – General Requirements and Conditions.
"Emission Standards and Requirements. A person who owns or operates an installation that causes NO_x emissions subject to this regulation is in compliance with this regulation if the person establishes compliance with the emissions standards in §B(1)(c) of this regulation."
- (2) COMAR 26.11.09.08B(1)(c), Control of NO_x Emissions for Major Stationary Sources – General Requirements and Conditions.
"Emission Standards in Pounds of NO_x per Million Btu of heat input."

Fuel	Tangential-Fired	Wall-Fired
Gas only	0.20	0.20
Gas/Oil	0.25	0.25
Coal (dry bottom)	0.38	0.38
Coal (wet bottom)	1.00	1.00

- (3) COMAR 26.11.09.08B(2)(a)(i) and (b), (c), and (d) – Control of NO_x Emissions for Major Stationary Sources – Demonstration of Compliance.

(a) "A person subject to a NO_x emission standard in this regulation shall demonstrate compliance as follows:

(i) For installations equipped with a CEM, compliance with the NO_x emissions standards in this regulation shall be established using CEM data; or

(ii) Not applicable."

(b) "CEMs shall be certified in accordance with 40 CFR Part 60, Appendix B, or Part 75, Appendix A."

(c) "CEMs shall meet the quality assurance criteria in 40 CFR Part 60, Appendix F, or, for sources subject to Title IV of the Clean Air Act (Acid Rain), the quality assurance criteria in 40 CFR Part 75, Appendix B."

(d) "Except as otherwise established by the Department and approved by the EPA, for a person who establishes compliance with the NO_x emissions standards in this regulation using a CEM, compliance shall be determined as 30-day rolling averages."

(e) Not applicable.

- (4) COMAR 26.11.09.08B(5) – Operator Training.

(a) "For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.

(b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department."

- (5) COMAR 26.11.09.08C(3) – Requirements for Fuel-Burning Equipment with a Rated Heat Input Capacity of 250 Million Btu Per Hour or Greater. "A person who owns or operates fuel burning equipment with a rated heat input capacity of 250 Million Btu per hour or greater shall install, operate, calibrate, and maintain a certified NO_x CEM or an alternative NO_x monitoring method approved by the Department and the EPA on each installation."

- (6) The Permittee shall design and operate the ultra-low NO_x burners on Boilers 1-4 and the low NO_x burner on Boiler 6 to meet the emission rate of 500 lbs/day (or 624 lbs/day, when appropriate) on a 30-day rolling average. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Sections V(11)(a) & V(10)(d) & MDE Permit to Construct 510-5-1476 issued on August 28, 2014. Modified by the Order Modifying Consent Decree dated August 5, 2013 and the emission rates proposed in a letter to the EPA dated March 14, 2014 and approved by the EPA in a letter on April 2, 2014.]

- (7) The primary combined NO_x emission limit that applies to the operation of Boilers 1-4 and 6 is 500 lbs/day, calculated on a 30-day rolling average as described in the District Court Consent Decree. This limit applies at all times, except in the circumstances described below when the limit of 624 lbs/day applies.

(a) Any day in which: (1) Boiler 6 operates at any point in time; (2) Boiler 6 operates in conjunction with any of the CE boilers; or (3) Boiler 6 does not operate and only three (3) of the CE boilers operate would count toward the 500 lbs/day 30 day rolling average.

(b) If there are seven calendar days within a 30 day period in which Boiler 6 does not operate and each of the four CE boilers operates for some period of time in that calendar day, then the combined NO_x emission limit is 624 lbs/day. The seven days do not need to be consecutive.

(c) ASR will calculate the 30 rolling average each day. If all four CE boilers operated for six days or less within the previous 30 calendar day period, the limit of 500 lbs/day applies. If all four CE boilers operated seven days or more during the previous 30-calendar day period, the limit of 624 lbs/day applies. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(11)(a) & MDE Permit to Construct 510-5-1444 through 5-1447 issued on August 28, 2014. Modified by the Order Modifying Consent Decree dated August 5, 2013 and the emission rates proposed in a letter to the EPA dated March 14, 2014 and approved by the EPA in a letter on April 2, 2014.]

- (8) The total combined NO_x emissions from Boilers 1-4 & 6 in any consecutive 12 month period shall not exceed 60 tons. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(13) & MDE Permit to Construct 510-5-1476 issued on August 28, 2014. Modified by the Order Modifying Consent Decree dated August 5, 2013 and the emission rates proposed in a letter to the EPA dated March 14, 2014 and approved by the EPA in a letter on April 2, 2014.]

- (9) The total combined NO_x emissions from Boilers 1-4 & 6 in any calendar month shall not exceed 6.0 tons. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(14) & MDE Permit to Construct 510-5-1476 issued on August 28, 2014]

Status (Check one): ☒ (Multiple CEMS Downtimes) Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): C6 – One (1) Babcox and Wilcox boiler rated at 300 MMBtu/hr firing natural gas and equipped with a low NO_x burner and flue gas recirculation.

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 2

2.1 Applicable Standards/Limits:

B. Control of Nitrogen Oxides

- (10) The Permittee shall not cause to be discharged into the atmosphere any gases that contain NO_x (expressed as NO₂) in excess of 86 ng/J (0.20 lb/MMBtu) heat input. This limit applies at all times including periods of startup, shutdown, or malfunction. Compliance with this emission limit is determined on a 30-day rolling average basis. [Reference: 40 CFR §60.44b(l)(1), 40 CFR §60.44b(h), 40 CFR §60.44b(i), and 40 CFR §60.46b(a) & MDE Permit to Construct 510-5-1476 issued on August 28, 2014]
- (11) The Permittee shall continuously operate the low NO_x burner at all times of boiler operation. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(11)(b) & MDE Permit to Construct 510-5-1476 issued on August 28, 2014. Modified by the Order Modifying Consent Decree dated August 5, 2013 and the emission rates proposed in a letter to the EPA dated March 14, 2014 and approved by the EPA in a letter on April 2, 2014.]

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 2

2.2 Testing Requirements:

B. Control of Nitrogen Oxides

- (1) The Permittee shall conduct the performance test as required under §60.8 using the continuous system for monitoring NO_x under §60.48b to determine compliance with the NO_x emission limit as follows:
 - (a) For the initial compliance test, NO_x from the steam generating unit are monitored for 30 successive steam generating unit operating days and the 30-day average emission rate is used to determine compliance with the NO_x emission standards under §60.44b. The 30-day average emission rate is calculated as the average of all hourly emission data recorded by the monitoring system during the 30-day test period.
 - (b) Following the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, the Permittee shall determine compliance with the NO_x standards under §60.44b on a continuous basis through the use of a 30-day rolling average emission rate. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NO_x emission data for the preceding 30 steam generating unit operating days. [Reference: 40 CFR §60.46b(c) and 40 CFR §60.46b(e)(1) and (3)]
- (2) The Permittee shall repeat certification testing when the Department determines that the CEM data may not meet performance specifications because of component replacement or other conditions that affect the quality of generated data. [Reference: COMAR 26.11.01.11E(2)(b)]

Plant Specific Conditions; Section IV

Table IV – 2

2.3 Monitoring Requirements:

B. Control of Nitrogen Oxides

- (1) At a point in the stack prior to a point at which boiler flue gas combines with flue gas from any other boiler, American Sugar shall install and make operational, a NO_x continuous emissions monitoring system (CEMS) to monitor NO_x emissions in accordance with the requirements of 40 CFR Part 60. The CEMS shall be installed and operated in accordance with the plan approved by the Department and EPA under the provisions of COMAR 26.11.01.11B(1)(a). [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(15) and COMAR 26.11.01.11B(1)(a) & MDE Permit to Construct No. 510-0314-5-1476 issued August 28, 2014.]
- (2) The Permittee shall calibrate, maintain, and operate a continuous emissions monitoring system, and record the output of the system for measuring NO_x emissions in accordance with 40 CFR §60.48b(b)(1).
- (3) Each CEMS shall be installed, certified, calibrated, maintained, and operated in accordance with the applicable requirements of 40 CFR Part 60, and any requirements established by applicable Maryland regulations. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(17) & MDE Permit to Construct No. 510-0314-5-1476 issued August 28, 2014]
- (4) The Permittee shall install, calibrate, maintain, and operate CEMS for measuring NO_x and O₂ (or CO₂) emissions discharged to the atmosphere, and shall record the output of the system. [Reference: 40 CFR §60.48b(b)(1)]
- (5) The procedures under §60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring system. The span value for NO_x is 500 ppm. [Reference: 40 CFR §60.48b(e)(2)(i)]
- (6) The CEMS shall monitor and record the applicable NO_x Emission Rate for Boiler 6 to demonstrate compliance with the NO_x emission rates and shall be continuously operated, except during CEMS breakdowns, repairs, calibration checks, and zero span adjustments. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(16) & MDE Permit to Construct No. 510-0314-5-1476 issued August 28, 2014]
- (7) The CEMS shall be operated and data recorded during all periods of operation of Boiler 6 except for CEMS breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments. [Reference: 40 CFR §60.48b(c)]
- (8) The Permittee shall measure all emissions of NO_x with the CEMS. During any period of time when any CEMS is inoperable or not measuring NO_x emissions from Boiler 6, the Permittee shall apply the missing data substitution procedures in 40 CFR Part 75, Subpart D. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(18) and 40 CFR §60.48b(f) & MDE Permit to Construct No. 510-0314-5-1476 issued August 28, 2014]
- (9) To comply with the annual emission cap, the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the total amount of NO_x emissions for the current month and the previous eleven months. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(20) & MDE Permit to Construct No. 510-0314-5-1476 issued August 28, 2014]

Status (Check one): ☒ (Multiple CEMS Downtimes) Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): C6 – One (1) Babcox and Wilcox boiler rated at 300 MMBtu/hr firing natural gas and equipped with a low NO_x burner and flue gas recirculation.

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 2

2.3 Monitoring Requirements:

B. Control of Nitrogen Oxides

- (10) To comply with the monthly emissions cap, the Permittee shall convert the monitored CEMS data to a mass emission (tons) and sum the amount of NO_x emissions for each Operating Day during the month. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(21) & MDE Permit to Construct No. 510-0314-5-1476 issued August 28, 2014]
- (11) The 1-hour average NO_x emission rates measured by the continuous NO_x monitor required by 40 CFR §60.48b(b) and required under §60.13(h) shall be expressed in ng/J or lb/MMBtu heat input and shall be used to calculate the average emission rates under §60.44b. The 1-hour averages shall be calculated using the data points required under §60.13(h)(2). [Reference: 40 CFR §60.48b(d)]
- (12) The Permittee shall use the alternative measurement method approved by the Department and the EPA if the Permittee is unable to obtain emissions data from CEMS because of a malfunction of the CEMS for more than 2 hours in duration. [Reference: COMAR 26.11.01.11B(4)]
- (13) The Permittee shall ensure that the CEMS used to monitor a gas concentration shall meet the quality assurance criteria of 40 CFR Part 60, Appendix F, as amended, which is incorporated by reference, or, if applicable, the quality assurance criteria of 40 CFR Part 75, Appendix B, as amended. [Reference: COMAR 26.11.01.10C]
- (14) The CEM used to monitor a gas concentration shall record not less than four equally spaced data points per hour and automatically reduce data in terms of averaging times consistent with the applicable emission standard. [Reference: COMAR 26.11.01.11D(2)]

Plant Specific Conditions; Section IV

Table IV – 2

2.4 Recordkeeping Requirements:

B. Control of Nitrogen Oxides

- (1) The Permittee shall maintain records for at least two (2) years of the following information for Boiler 6 for each operating day.
 - (a) Calendar date;
 - (b) The average hourly NO_x emission rates (expressed as NO₂) (ng/J) or lb/MMBtu heat input) measured or predicted;
 - (c) The 30-day average NO_x emission rates (ng/J or lb/MMBtu heat input) calculated at the end of each Boiler 6 operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 Boiler 6 operating days;
 - (d) Identification of the Boiler 6 operating days when the calculated 30-day average NO_x emission rates are in excess of the NO_x emissions standards under §60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken;
 - (e) Identification of the Boiler 6 operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;
 - (f) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;
 - (g) Identification of the "F" factor used for calculations, method of determination, and type of fuel combusted;
 - (h) Identification of the times when the pollutant concentration exceeded full span of the CEMS;
 - (i) Description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specification 2 or 3 in Appendix B of 40 CFR Part 60; and
 - (j) Results of daily CEMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 of 40 CFR Part 60.

[Reference: 40 CFR §60.49b(g), (i) and (o)]

- (2) The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, records of the following information:
 - (a) Annual fuel use records for Boiler 6;
 - (b) Log of operation and maintenance of the CEMS including duration and reason of any malfunctions; and
 - (c) Records of operator training.

[Reference: MDE Permit to Construct No. 510-0314-5-1476 issued August 28, 2014]

Plant Specific Conditions; Section IV

Table IV – 2

2.5 Reporting Requirements:

B. Control of Nitrogen Oxides

- (1) The Permittee must submit excess emission reports for any excess emissions that occurred during the reporting period. The Permittee must maintain these records on site for at least two (2) years. [Reference: 40 CFR §60.49b(h)(2)(i) and (o)]
- (2) The Permittee must submit notification of the date of initial startup of Boiler 6, as provided by §60.7. This notification shall include the following:
 - (a) The design heat input capacity of Boiler 6 and identification of the fuel to be combusted;
 - (b) If applicable, a copy of any federally enforceable requirements that limits the annual capacity factor for any fuel or mixture of fuel under §§60.44b(c), (d), (e), (i), (j), (k), 60.46b(h), or 60.48b(i); and
 - (c) The annual capacity factor at which the Permittee anticipates operating the facility based on the natural gas fired. [Reference: 40 CFR §60.49b(a)]

Status (Check one): ☒ (Multiple CEMS Downtimes) Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): C6 – One (1) Babcox and Wilcox boiler rated at 300 MMBtu/hr firing natural gas and equipped with a low NO_x burner and flue gas recirculation.

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 2

2.5 Reporting Requirements:

B. Control of Nitrogen Oxides

- (3) The Permittee shall submit to the Department the performance test data from the initial performance test and the performance evaluation of the CEMS using the applicable performance specifications in Appendix B of 40 CFR Part 60. [Reference: 40 CFR §60.49b(b)]
- (4) The Permittee must report orally or by electronic or facsimile transmission to the U.S. EPA and MDE, no later than 24 hours after the Permittee knew or should have known of any violation of the District Court Consent Decree, any permit regulations, or any event that may pose an immediate threat to the public health or welfare of the environment. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section IX(40) & MDE Permit to Construct No. 510-0314-5-1476 issued August 28, 2014]
- (5) COMAR 26.11.09.08K - Reporting Requirements.
 - (1) "When demonstration of compliance with the NO_x emission standards in this regulation is based on CEM data, quarterly emission reports shall be submitted to the Department on or before the thirtieth day of the month following the end of each calendar quarter.
 - (2) When compliance with this regulation is demonstrated by a stack test, the results of the stack tests required by this regulation shall be submitted to the Department within 45 days after completion of the test.
 - (3) A person subject to this regulation shall maintain annual fuel use records on site for not less than 3 years, and make these records available to the Department upon request."
- (6) The Permittee must report to the Department, by telephone, any CEM system downtime that lasts or is expected to last more than 24 hours, by 10 a.m. of the first regular business day following the breakdown. The Permittee must also notify the Department, by telephone, when an out-of-service CEMS is back in operation. [Reference: COMAR 26.11.01.11E(1)(a) and (b)]
- (7) The Permittee shall comply with the CEM system downtime reporting requirements of COMAR 26.11.01.11E:
 - (a) All CEM system downtime that lasts or is expected to last more than 24 hours shall be reported to the Department by telephone before 10 a.m. of the first regular business day following the breakdown.
 - (b) The system breakdown report required by COMAR 26.11.01.11E(1)(a) shall include the reasons, if known, for the breakdown and the estimated period of time that the CEMS will be down. The Permittee shall notify the Department by telephone when an out-of-service CEM is back in operation and producing valid data. [Reference: COMAR 26.11.01.11E(1)]
- (8) The Permittee shall submit to the Department quarterly, a CEMS summary report not later than 30 days following each calendar quarter to demonstrate compliance with the NO_x emissions limits. The report shall include the following information:
 - (i) The cause, time periods, and magnitude of all emissions which exceed the applicable emission standards;
 - (ii) The source downtime including the time and date of the beginning and end of each downtime period and whether the source downtime was planned or unplanned;
 - (iii) The time periods and cause of all CEM downtime including records of any repairs, adjustments, or maintenance that may affect the ability of the CEM to meet performance specifications of emission data;
 - (iv) Quarterly totals of excess emissions, installation downtime, and CEM downtime during the calendar quarter;
 - (v) Quarterly quality assurance activities;
 - (vi) Daily calibration activities that include reference values, actual values, absolute or percent of span differences, and drift status; and
 - (vii) Other information required by the Department that is determined to be necessary to evaluate the data, to ensure that compliance is achieved, or to determine the applicability of this regulation. [Reference: COMAR 26.11.01.11E(2)(c)]
- (9) The Permittee shall submit within 30 days following each January 1st and July 1st, a semi-annual report to the U.S. EPA for the immediately preceding half-calendar year period. This report shall:
 - (a) Identify any and all dates on which the Permittee has installed, or describe the progress of installation of the low NO_x burner required for NO_x control, emission limits, CEMS, and monitoring requirements and describe any problems encountered or anticipated during such installation, together with implemented or proposed solutions;
 - (b) Provide all CEMS data collected for Boiler 6 including an explanation of any periods of CEMS downtime together with any missing data for which the Permittee applied and missing data substitution procedures under Section VI.B of the District Court Consent Decree;
 - (c) Demonstrate compliance with all applicable 30-day rolling average emission limits in Section V of the District Court Consent Decree; and
 - (d) Describe the status of any operation and maintenance work relating to activities under the District Court Consent Decree. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section IX(38) & MDE Permit to Construct No. 510-0314-5-1476 issued August 28, 2014]

Status (Check one): ☒ (Multiple CEMS Downtimes) Intermittent Compliance ☐ Continuous Compliance

Emission Unit ID(s): C6 – One (1) Babcox and Wilcox boiler rated at 300 MMBtu/hr firing natural gas and equipped with a low NO_x burner and flue gas recirculation.

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 2

2.1. Applicable Standards/Limits:

C. Operational Limitations

- (1) The Permittee shall burn only natural gas in this boiler. [Reference: MDE Permit to Construct 510-5-1476 issued on August 28, 2014]
- (2) The Permittee must use gaseous fuels with potential SO₂ emissions rates of 26 ng/J (0.060 lb/MMBtu) or less and shall not use a post-combustion technology to reduce SO₂ or PM emissions. The Permittee must meet these requirements in order to not be required to install or operate a COMS. [Reference: 40 CFR §60.48b(j)(2) & MDE Permit to Construct 510-5-1476 issued on August 28, 2014]

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 2

2.2 Testing Requirements:

C. Operational Limitations

See Monitoring Requirements.

Plant Specific Conditions; Section IV

Table IV – 2

2.3 Monitoring Requirements:

C. Operational Limitations

The Permittee shall install meters to record the hours of operation of this boiler and shall maintain the monitoring records in an electronic format for at least five (5) years. [Reference: District Court Consent Decree, Civil Action No. JKB-12-1408, Section V(19) & MDE Permit to Construct No. 510-0314-5-1476 issued August 28, 2014]

Plant Specific Conditions; Section IV

Table IV – 2

2.4 Recordkeeping Requirements:

C. Operational Limitations

The Permittee shall record and maintain records of the amounts of natural gas combusted during each day and calculate the annual capacity factor for natural gas for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. The records must be maintained on-site for at least two (2) years and be made available to the Department upon request. [Reference: 40 CFR §60.49b(d)(1) and (o)]

Plant Specific Conditions; Section IV

Table IV – 2

2.5 Reporting Requirements:

C. Operational Limitations

See Record Keeping Requirements and Reporting Requirements of Control of Nitrogen Oxides.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): R29-1 – Raw Sugar Unloading and Conveying (Section 3)Permit Term (Describe requirements and cross-reference):Plant Specific Conditions; Section IVTable IV – 3**3.1 Applicable Standards/Limits:****A. Control of Visible Emissions**

COMAR 26.11.06.02C(2) - Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06.02 A(2) - General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Compliance Methods for the Above (Description and Citation):Plant Specific Conditions; Section IVTable IV – 3**3.2 Testing Requirements:****A. Control of Visible Emissions**

See Monitoring Requirements.

Plant Specific Conditions; Section IVTable IV – 3**3.3 Monitoring Requirements:****A. Control of Visible Emissions**

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

[Reference: COMAR 26.11.03.06]

Plant Specific Conditions; Section IVTable IV – 3**3.4 Record Keeping:**

NOTE: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]

A. Control of Visible Emissions

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06]

Plant Specific Conditions; Section IVTable IV – 3**3.5 Reporting Requirements:****A. Visible Emissions Limitations**

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): R29-1 – Raw Sugar Unloading and Conveying (Section 3)

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 3

3.1 Applicable Standards/Limits:

B. Control of Particulate Matter

COMAR 26.11.06.03C(1) - Particulate Matter from Unconfined Sources. - "A person may not cause or permit emissions from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions. In making this determination, the Department shall consider technological feasibility, practicality, economic impact, and the environmental consequences of the decision."

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 3

3.2 Testing Requirements:

B. Control of Particulate Matter

See Monitoring Requirements.

Plant Specific Conditions; Section IV

Table IV – 3

3.3 Monitoring Requirements:

B. Control of Particulate Matter

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.

[Reference: COMAR 26.11.03.06]

Plant Specific Conditions; Section IV

Tables IV – 3

3.4 Record Keeping:

B. Control of Particulate Matter

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and
- (2) a log with records of the dates and description of maintenance activity performed.

[Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Tables IV – 3

3.5 Reporting Requirements:

B. Control of Particulate Matter

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): R29-2, R29-3, R29-4, S7B-2, S7-12, S7-13, S7-14 (Section 4)Permit Term (Describe requirements and cross-reference):Plant Specific Conditions; Section IVTable IV-4**4.1 Applicable Standards/Limits:****A. Control of Visible Emissions**

COMAR 26.11.06.02C(2) - Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06.02 A(2) - General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Compliance Methods for the Above (Description and Citation):Plant Specific Conditions; Section IVTable IV-4**4.2 Testing Requirements:****A. Control of Visible Emissions**

See Monitoring Requirements.

Plant Specific Conditions; Section IVTable IV-4**4.3 Monitoring Requirements:****A. Control of Visible Emissions**

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

[Reference: COMAR 26.11.03.06]

The Permittee shall maintain records of the results of the monthly inspections and the log of inspections and maintenance for at least five (5) years and make them available to the Department upon request.

[Reference: COMAR 26.11.03.06]

Plant Specific Conditions; Section IVTable IV-4**4.4 Record Keeping:**

NOTE: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]

A. Control of Visible Emissions

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06]

Plant Specific Conditions; Section IVTable IV-4**4.5 Reporting Requirements:****A. Visible Emissions Limitations**

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): R29-2, R29-3, R29-4, S7B-2, S7-12, S7-13, S7-14 (Section 4)

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV-4

4.1 Applicable Standards/Limits:

B. Control of Particulate Matter

COMAR 26.11.06.03B(2) - Particulate Matter from Confined Sources - "(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV-4

4.2 Testing Requirements:

B. Control of Particulate Matter

See Monitoring Requirements.

Plant Specific Conditions; Section IV

Table IV-4

4.3 Monitoring Requirements :

B. Control of Particulate Matter

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.

[Reference: COMAR 26.11.03.06]

Plant Specific Conditions; Section IV

Table IV-4

4.4 Record Keeping:

B. Control of Particulate Matter

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and
- (2) a log with records of the dates and description of maintenance activity performed.

[Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV-4

4.5 Reporting Requirements:

B. Control of Particulate Matter

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): D28-1, D10-1, D10-2, D10-3 (Section 5)**Permit Term (Describe requirements and cross-reference):****Plant Specific Conditions; Section IV****Table IV – 5****5.1 Applicable Standards/Limits:****A. Control of Visible Emissions**

COMAR 26.11.06.02C(2) - Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06.02 A(2) - General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Compliance Methods for the Above (Description and Citation):**Plant Specific Conditions; Section IV****Table IV – 5****5.2 Testing Requirements :****A. Control of Visible Emissions**

See Monitoring Requirements.

Plant Specific Conditions; Section IV**Table IV – 5****5.3 Monitoring Requirements:****A. Control of Visible Emissions**

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

[Reference: COMAR 26.11.03.06]

Plant Specific Conditions; Section IV**Table IV – 5****5.4 Record Keeping:**

NOTE: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]

A. Control of Visible Emissions

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06]

Plant Specific Conditions; Section IV**Table IV – 5****5.5 Reporting Requirements:****A. Visible Emissions Limitations**

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): D28-1, D10-1, D10-2, D10-3 (Section 5)Permit Term (Describe requirements and cross-reference):Plant Specific Conditions; Section IVTable IV – 55.1 Applicable Standards/Limits:B. Control of Particulate Matter

COMAR 26.11.06.03B(2) - Particulate Matter from Confined Sources.

"(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."

Compliance Methods for the Above (Description and Citation):Plant Specific Conditions; Section IVTable IV – 55.2 Testing Requirements:B. Control of Particulate Matter

See Monitoring Requirements.

Plant Specific Conditions; Section IVTable IV – 55.3 Monitoring Requirements:B. Control of Particulate Matter

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.

[Reference: COMAR 26.11.03.06]

Plant Specific Conditions; Section IVTable IV – 55.4 Record Keeping:B. Control of Particulate Matter

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (1) a copy of the preventative maintenance plan for each dust collector;
- (2) records of the dust collector malfunctions and the corrective actions taken to bring it back into proper operation; and
- (3) a log with records of the dates and description of maintenance activity performed.

[Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IVTable IV – 55.5 Reporting Requirements:B. Control of Particulate Matter

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): D2-1 – Mud Loading and U-5 – Cooling Tower (Section 6)Permit Term (Describe requirements and cross-reference):Plant Specific Conditions; Section IVTable IV – 66.1 Applicable Standards/Limits:A. Control of Visible Emissions

COMAR 26.11.06.02C(2) - Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

Compliance Methods for the Above (Description and Citation):Plant Specific Conditions; Section IVTable IV – 66.2 Testing Requirements:A. Control of Visible Emissions

See Monitoring Requirements.

Plant Specific Conditions; Section IVTable IV – 66.3 Monitoring Requirements:A. Control of Visible Emissions

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

[Reference: COMAR 26.11.03.06]

Plant Specific Conditions; Section IVTable IV – 66.4 Record Keeping:

NOTE: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]

A. Control of Visible Emissions

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06]

Plant Specific Conditions; Section IVTable IV – 66.5 Reporting Requirements:A. Visible Emissions Limitations

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): D2-1 – Mud Loading and U-5 – Cooling Tower (Section 6)

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 6

6.1 Applicable Standards/Limits:

B. Control of Particulate Matter

COMAR 26.11.06.03C(1) - Particulate Matter from Unconfined Sources. - "A person may not cause or permit emissions from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions. In making this determination, the Department shall consider technological feasibility, practicality, economic impact, and the environmental consequences of the decision."

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 6

6.2 Testing Requirements:

B. Control of Particulate Matter

See Monitoring Requirements.

Plant Specific Conditions; Section IV

Table IV – 6

6.3 Monitoring Requirements:

B. Control of Particulate Matter

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan.

[Reference: COMAR 26.11.03.06]

Plant Specific Conditions; Section IV

Tables IV – 6

6.4 Record Keeping:

B. Control of Particulate Matter

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and
- (2) a log with records of the dates and description of maintenance activity performed.

[Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Tables IV – 6

6.5 Reporting Requirements:

B. Control of Particulate Matter

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): S5-1, S5-2, S5-3, S5-4, S5-5, S5-6, S5-8A, S5-8B, S5-8C, S5-8D, S5-8E, S5-8F, S5-8G, S1-1, S6-7, S7A-1, S7-5, S7-6, S7-7, S7-8A, S7-8B, S7-8C, S7-10A, S7-10B, S7-10C, S7B-1, S7-11A, S7-11B, S7-11C (Section 7)

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 7

7.1 Applicable Standards/Limits:

A. Control of Visible Emissions

COMAR 26.11.06.02C(2) - Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06.02 A(2) - General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 7

7.2 Testing Requirements:

A. Control of Visible Emissions

See Monitoring Requirements.

Plant Specific Conditions; Section IV

Table IV – 7

7.3 Monitoring Requirements:

A. Control of Visible Emissions

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

[Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV – 7

7.4 Record Keeping:

NOTE: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]

A. Control of Visible Emissions

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV – 7

7.5 Reporting Requirements:

A. Visible Emissions Limitations

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): S5-1, S5-2, S5-3, S5-4, S5-5, S5-6, S5-8A, S5-8B, S5-8C, S5-8D, S5-8E, S5-8F, S5-8G, S1-1, S6-7, S7A-1, S7-5, S7-6, S7-7, S7-8A, S7-8B, S7-8C, S7-10A, S7-10B, S7-10C, S7B-1, S7-11A, S7-11B, S7-11C (Section 7)

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 7

7.1 Applicable Standards/Limits:

B. Control of Particulate Matter

- (1) COMAR 26.11.06.03B - Particulate Matter from Confined Sources. - "(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."
- (2) COMAR 26.11.06.03D - Particulate Matter from Material Handling and Construction. - "A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from being airborne."

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 7

7.2 Testing Requirements:

B. Control of Particulate Matter

See Monitoring Requirements.

Plant Specific Conditions; Section IV

Table IV – 7

7.3 Monitoring Requirements:

B. Control of Particulate Matter

- (1) The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the timeframe established in the plan. [Reference: COMAR 26.11.03.06C]
- (2) The exhaust gases from two liquid sugar dryers (VD1 and VD-2), the liquid sugar coolers (VC-1) and three centrifugal separators (SK-1, SK-2, and SK-3) shall be vented through the cyclonic separator and the venturi scrubber, when the specialty sugar refining process is operating. [Reference: MDE Permit to Construct #510-8-0332 issued on July 10, 2003]
- (3) The exhaust gases from the washout tanks/beater shall be vented through the rotoclone scrubber, when the specialty sugar refining process is operating. [Reference: MDE Permit to Construct #510-8-0332 issued on July 10, 2003]
- (4) The exhaust gases from the packing and conveying equipment shall be vented through the rotoclone and the venturi scrubber, when the specialty sugar refining process is operating. [Reference: MDE Permit to Construct #510-8-0332 issued on July 10, 2003]

Plant Specific Conditions; Section IV

Table IV – 7

7.4 Record Keeping:

B. Control of Particulate Matter

- (1) Records of the amount and type of specialty sugar produced each month for the specialty sugar refining process equipped with four venturi scrubbers shall be kept at the site for at least five (5) years and shall be made available to the Department upon request. [Reference: Permit to Construct #510-8-0332 issued on July 10, 2003]
- (2) The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:
 - (a) a copy of the preventative maintenance plan for each dust collector;
 - (b) records of the dust collector malfunctions and the corrective actions taken to bring it back into proper operation; and
 - (c) a log with records of the dates and description of maintenance activity performed.

[Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV – 7

7.5 Reporting Requirements:

B. Control of Particulate Matter

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): S6-4, S6-5, S6-6, S6-7 (Section 8)**Permit Term (Describe requirements and cross-reference):****Plant Specific Conditions; Section IV****Table IV – 8****8.1 Applicable Standards/Limits:****A. Control of Visible Emissions**

COMAR 26.11.06.02C(2) - Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06.02A(2) - General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during startup and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Compliance Methods for the Above (Description and Citation):**Plant Specific Conditions; Section IV****Table IV – 8****8.2 Testing Requirements :****A. Control of Visible Emissions**

See Monitoring Requirements.

Plant Specific Conditions; Section IV**Table IV – 8****8.3 Monitoring Requirements:****A. Control of Visible Emissions**

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

[Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV**Table IV – 8****8.4 Record Keeping:**

NOTE: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]

A. Control of Visible Emissions

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV**Table IV – 8****8.5 Reporting Requirements:****A. Visible Emissions Limitations**

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): S6-4, S6-5, S6-6, S6-7 (Section 8)**Permit Term (Describe requirements and cross-reference):****Plant Specific Conditions; Section IV****Table IV – 8****8.1 Applicable Standards/Limits:****B. Control of Particulate Matter****(1) COMAR 26.11.06.03B(2) - Particulate Matter from Confined Sources.**

"(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."

(2) COMAR 26.11.06.03D – Particulate Matter from Material Handling and Construction.

"A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:

- (1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts.
- (3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.
- (4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would covering the vehicles.
- (5) The paving of roadways and their maintenance in clean condition.
- (6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water."

Compliance Methods for the Above (Description and Citation):**Plant Specific Conditions; Section IV****Table IV – 8****8.2 Testing Requirements:****B. Control of Particulate Matter**

See Monitoring Requirements.

Plant Specific Conditions; Section IV**Table IV – 8****8.3 Monitoring Requirements:****B. Control of Particulate Matter**

- (1) The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the timeframe established in the plan. [Reference: COMAR 26.11.03.06C]
- (2) The exhaust gases from the packing and conveying equipment shall be vented through the rotoclone and the venture scrubber, when the specially sugar refining process is operating. [Reference: MDE Permit to Construct #510-8-0332 issued on July 10, 2003]

Plant Specific Conditions; Section IV**Table IV – 8****8.4 Record Keeping:****B. Control of Particulate Matter**

- (1) Records of the amount and type of specially sugar produced each month for the specially sugar refining process equipped with four venturi scrubbers shall be kept at the site for at least five (5) years and shall be made available to the Department upon request. [Reference: Permit to Construct #510-8-0332 issued on July 10, 2003]
- (2) The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:
 - (a) a copy of the preventative maintenance plan for each dust collector;
 - (b) records of the dust collector malfunctions and the corrective actions taken to bring it back into proper operation; and
 - (c) a log with records of the dates and description of maintenance activity performed.

[Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV**Table IV – 8****8.5 Reporting Requirements:****B. Control of Particulate Matter**

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): S6-1, S6-1A, S6-2, S6-2A, S6-3, S6-3A, S6-8, S6-9 (Section 9)**Permit Term (Describe requirements and cross-reference):****Plant Specific Conditions; Section IV****Table IV – 9****9.1 Applicable Standards/Limits:****A. Control of Visible Emissions**

COMAR 26.11.06.02C(2) - Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06.02A(2) - General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during startup and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Compliance Methods for the Above (Description and Citation):**Plant Specific Conditions; Section IV****Table IV – 9****9.2 Testing Requirements:****A. Control of Visible Emissions**

See Monitoring Requirements.

Plant Specific Conditions; Section IV**Table IV – 9****9.3 Monitoring Requirements:****A. Control of Visible Emissions**

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

[Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV**Table IV – 9****9.4 Record Keeping:**

NOTE: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]

A. Control of Visible Emissions Limitations

The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV**Table IV – 9****9.5 Reporting Requirements:****A. Control of Visible Emissions**

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): S6-1, S6-1A, S6-2, S6-2A, S6-3, S6-3A, S6-8, S6-9 (Section 9)

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 9

9.1 Applicable Standards/Limits:

B. Control of Particulate Matter

(1) COMAR 26.11.06.03B(2) - Particulate Matter from Confined Sources.

“(2) Areas III and IV. (a) A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”

(2) COMAR 26.11.06.03D – Particulate Matter from Material Handling and Construction.

“A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:

(1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.

(2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts.

(3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations.

(4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would cover the vehicles.

(5) The paving of roadways and their maintenance in clean condition.

(6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water.”

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 9

9.2 Testing Requirements:

B. Control of Particulate Matter

See Monitoring Requirements.

Plant Specific Conditions; Section IV

Table IV – 9

9.3 Monitoring Requirements:

B. Control of Particulate Matter

The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the timeframe established in the plan.

[Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV – 9

9.4 Record Keeping:

B. Control of Particulate Matter

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

(a) a copy of the preventative maintenance plan for each dust collector;

(b) records of the dust collector malfunctions and the corrective actions taken to bring it back into proper operation; and

(c) a log with records of the dates and description of maintenance activity performed.

[Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV – 9

9.5 Reporting Requirements:

B. Control of Particulate Matter

See Record Keeping Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): S5-7, S7-15, S7-16 (Section 10)**Permit Term (Describe requirements and cross-reference):****Plant Specific Conditions; Section IV****Table IV – 10****10.1 Applicable Standards/Limits:****A. Control of Visible Emissions**

COMAR 26.11.06.02C(2) - Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06.02 A(2) - General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Compliance Methods for the Above (Description and Citation):**Plant Specific Conditions; Section IV****Table IV – 10****10.2 Testing Requirements:****A. Control of Visible Emissions**

See Reporting Requirements.

Plant Specific Conditions; Section IV**Table IV – 10****10.3 Monitoring Requirements:****A. Control of Visible Emissions**

See Reporting Requirements.

Plant Specific Conditions; Section IV**Table IV – 10****10.4 Record Keeping:**

NOTE: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]

A. Control of Visible Emissions

See Reporting Requirements

Plant Specific Conditions; Section IV**Table IV – 10****10.5 Reporting Requirements:****A. Visible Emissions Limitations**

The Permittee shall report all occurrences of excess emissions to the Department. [Reference: COMAR 26.11.01.07]

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): S5-7, S7-15, S7-16 (Section 10)**Permit Term (Describe requirements and cross-reference):****Plant Specific Conditions; Section IV****Table IV – 10****10.1 Applicable Standards/Limits:****B. Control of VOC Emissions**

The following conditions B(1) – B(5) apply only to the Video Inkjet Packaging Lines (MDE Registration No. 6-2018)

(1) COMAR 26.11.19.02I - Good Operating Practices, Equipment Cleanup, and VOC Storage.

- (1) "Applicability. The requirements in this section apply to a person who owns or operates an installation that is subject to any requirement in this chapter."
- (2) "Good Operating Practices.
 - (a) A person who is subject to this section shall implement good operating practices to minimize VOC emissions into the atmosphere.
 - (b) Good operating practices shall, at a minimum, include the following:
 - (i) Provisions for training of operators on practices, procedures, and maintenance requirements that are consistent with the equipment manufacturers' recommendations and the source's experience in operating the equipment, with the training to include proper procedures for maintenance of air pollution control equipment;
 - (ii) Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use;
 - (iii) Minimize spills of VOC-containing cleaning materials;
 - (iv) Convey VOC-containing cleaning materials from one location to another in closed containers or pipelines;
 - (v) Minimize VOC emissions from cleaning of storage, mixing, and conveying equipment;
 - (vi) As practical, scheduling of operations to minimize color or material changes when applying VOC coatings or other materials by spray gun;
 - (vii) For spray gun applications of coatings, use of high volume low pressure (HVLV) or other high efficiency application methods where practical; and
 - (viii) As practical, mixing or blending materials containing VOC in closed containers and taking preventive measures to minimize emissions for products that contain VOC.
 - (c) A person subject to this regulation shall:
 - (i) Establish good operating practices in writing;
 - (ii) Make the written operating practices available to the Department upon request; and
 - (iii) Display the good operating practices so that they are clearly visible to the operator or include them in operator training."
- (3) "Equipment Cleanup.
 - (a) A person subject to this section shall take all reasonable precautions to prevent or minimize the discharge of VOC into the atmosphere when cleaning process and coating application equipment, including containers, vessels, tanks, lines, and pumps.
 - (b) Reasonable precautions for equipment cleanup shall, at a minimum, include the following:
 - (i) Storing all wastes and waste materials, including cloth and paper that are contaminated with VOC, in closed containers;
 - (ii) Preparing written standard operating procedures for frequently cleaned equipment, including when practical, provisions for the use of low-VOC or non-VOC materials and procedures to minimize the quantity of VOC materials used;
 - (iii) Using enclosed spray gun cleaning, VOC-recycling systems and other spray gun cleaning methods where practical that reduce or eliminate VOC emissions; and
 - (iv) Using, when practical, detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines, containers, and process equipment."
- (4) "VOC Storage and Transfer.
 - (a) A person subject to this section who stores VOCs shall, at a minimum, install conservation vents or other vapor control measures on storage tanks with a capacity of 2,000 gallons or more to minimize VOC emissions.
 - (b) A person subject to this section shall, at a minimum, utilize vapor balance, vapor control lines, or other vapor control measures when VOCs are transferred from a tank truck into a stationary storage tank with a capacity greater than 10,000 gallons and less than 40,000 gallons that store VOCs or materials containing VOCs, other than gasoline, that have a vapor pressure greater than 1.5 psia."

(2) COMAR 26.11.19.16C - Control of VOC Equipment Leaks – General Requirements. "A person subject to this regulation shall comply with all of the following requirements:

- (1) Visually inspect all components on the premises for leaks at least once each calendar month.
- (2) Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date the leak was discovered, and the name of the person who discovered the leak. The tag shall remain in place until the leak has been repaired.
- (3) Take immediate action to repair all observed VOC leaks that can be repaired within 48 hours.
- (4) Repair all other leaking components not later than 15 days after the leak is discovered. If a replacement part is needed, the part shall be ordered within 3 days after discovery of the leak, and the leak shall be repaired within 48 hours after receiving the part.
- (5) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipe fittings.
- (6) Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, and a list of leaks by tag identification number. The log shall be made available to the Department upon request. Leak records shall be maintained for a period of not less than 2 years from the date of their occurrence."
- (3) **COMAR 26.11.19.16D. Exceptions.** Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, shall be identified in the log and included within the source's maintenance schedule for repair during the next source shutdown."
- (4) **COMAR 26.11.19.18B(1)(d) - Applicability.** "This regulation applies to a person, owner or operator who: (d) Performs digital imaging at a premises that causes VOC emissions of 20 pounds or more per day from all digital imaging at the premises."
- (5) **COMAR 26.11.19.18F - General Requirements for Digital Imaging.** "A person who owns or operates digital imaging that is subject to this regulation may not cause the discharge of VOC emissions into the atmosphere in excess of 100 pounds on any day from all digital printing at the premises."

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): S5-7, S7-15, S7-16 (Section 10)**Permit Term (Describe requirements and cross-reference):****Plant Specific Conditions; Section IV****Table IV – 10****10.1 Applicable Standards/Limits:****B. Control of VOC Emissions**

The following conditions B(6) – B(11) apply only to the Packaging Adhesive Fugitives Lines (MDE Registration No. 9-1298)

- (1) **(6) COMAR 26.11.35.01E - Applicability and Exemptions.** “The provisions of Regulation .04A and D of this chapter do not apply to the use of adhesives, sealants, adhesive primers, sealant primers, cleanup solvents, and surface preparation solvents if:
- (1) The total volume of noncomplying adhesives, sealants, primers, cleanup solvents, and surface preparation solvents applied facility-wide does not exceed 55 gallons per calendar year; and
 - (2) The person claiming the usage exemption under §E(1) of this regulation maintains monthly operational records sufficient to demonstrate compliance as required by Regulation .05A of this chapter.”

Note: In any calendar year in which ASR uses more than 55 gallons of packaging adhesives, ASR must meet the requirements of COMAR 26.11.35.04A and D.

- (2) **(7) COMAR 26.11.35.04A - Standards.** “Except as provided in §E of this regulation and Regulation .01 of this chapter, on and after January 1, 2009, a person may not: (3) Use or apply an adhesive, sealant, adhesive primer, or sealant primer within the State that exceeds the applicable VOC content limits specified in Table 1.”

- (3) **(8) COMAR 26.11.35.04G - Table 1.**

VOC Content Limits for Adhesives, Sealants, Adhesive Primers, Sealant Primers, and Adhesives Applied to Particular Substrates		
Adhesive, sealant, adhesive primer, or sealant primer	VOC content limit	
Category	VOC (grams per liter*)	VOC (pounds per gallon*)
Adhesives Applied to the Listed Substrate		
Porous material	120	1.00

* The VOC content is determined as the weight of volatile compounds, less water and exempt compounds, as specified in Regulation .06 of this chapter.

- (4) **(9) COMAR 26.11.35.04C - Surface Preparation or Cleanup Solvent.**
- (1) “This section applies to a person subject to this chapter using a surface preparation or cleanup solvent.
 - (2) Except as provided in §C(3) of this regulation for single-ply roofing, a person may not use materials for surface preparation containing VOCs unless the VOC content of the surface preparation solvent is less than 70 grams per liter.
 - (3) If a surface preparation solvent is used in applying single-ply roofing, a person may not use materials for surface preparation containing VOCs unless the composite vapor pressure, excluding water and exempt compounds, of the surface preparation solvent does not exceed 45 millimeters of mercury at 20°C.
 - (4) Except as provided in §C(5) of this regulation, a person may not use materials containing VOCs for the removal of adhesives, sealants, or adhesive or sealant primers from surfaces, other than spray application equipment, unless the composite vapor pressure of the solvent used is less than 45 millimeters of mercury at 20°C.
 - (5) Removal of an adhesive, sealant, adhesive primer, or sealant primer from the parts of spray application equipment shall be performed as follows:
 - (a) In an enclosed cleaning system or equivalent cleaning system as determined by the test method identified in Regulation .06H of this chapter;
 - (b) Using a solvent with a VOC content less than or equal to 70 grams of VOC per liter of material; or
 - (c) Parts containing dried adhesive may be soaked in a solvent if the composite vapor pressure of the solvent, excluding water and exempt compounds, is less than or equal to 9.5 millimeters of mercury at 20°C and the parts and solvent are in a closed container that remains closed except when adding parts to or removing parts from the container.”
- (5) **(10) COMAR 26.11.35.04E - Standards.** “A person using adhesives, sealants, adhesive primers, sealant primers, surface preparation solvents, or cleanup solvents subject to this chapter shall store or dispose of all absorbent materials, such as cloth or paper, that are moistened with adhesives, sealants, primers, or solvents subject to this chapter in nonabsorbent containers that are closed except when placing materials in or removing materials from the container.”
- (6) **(11) COMAR 26.11.35.04F - Standards.** “A person may not solicit, require the use, or specify the application of an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent, or cleanup solvent if the use or application results in a violation of this chapter. This requirement applies to all written or oral contracts under which an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent, or cleanup solvent subject to this chapter is to be used at a location in the State.”

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): S5-7, S7-15, S7-16 (Section 10)**Compliance Methods for the Above (Description and Citation):****Plant Specific Conditions; Section IV****Table IV – 10****10.2 Testing Requirements:****B. Control of VOC Emissions**

See Monitoring Requirements.

Plant Specific Conditions; Section IV**Table IV – 10****10.3 Monitoring Requirements:****B. Control of VOC Emissions***The following conditions B(1) and B(2) apply only to the Video Inkjet Packaging Lines (MDE Registration No. 6-2018)*

- (1) The Permittee shall conduct facility-wide inspections at least once per calendar month to determine the compliance status of facility operations with regard to implementation of “good operating practices” designed to minimize emissions of VOC. [Reference: COMAR 26.11.03.06C]
- (2) The Permittee shall:
 - (1) Visually inspect all components (process equipment, storage tanks, pumps, compressors, valves, flanges, pipeline fittings, pressure relief valves) at the facility for VOC leaks at least once each calendar month;
 - (2) Tag any VOC leak immediately with I.D. Number, the date VOC leak was discovered, and the name of the person who discovered the VOC leak. The tag is to remain in place until the VOC leak is repaired;
 - (3) Take immediate action to repair/control all observed VOC leaks that can be repaired within 48 hours;
 - (4) Repair all other VOC leaking components not later than 15 days after the VOC leak is discovered in accordance with COMAR 26.11.19.16C(4);
 - (5) If a replacement part is needed, it shall be ordered within 3 days after discovery of the VOC leak and the leak shall be repaired within 48 hours after receiving the part;
 - (6) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced; and
 - (7) Identify in a log components that cannot be repaired as required by this regulation because they are inaccessible, or that cannot be repaired during operation of the source, and include them within the source’s maintenance schedule for repair during the next source shutdown.

[Reference: COMAR 26.11.19.16C and D]

The following conditions B(3) through B(6) apply only to the Packaging Adhesive Fugitives Lines (MDE Registration No. 9-1298)

- (3) The Permittee shall not use any adhesive with a VOC content of greater than 1.0 pound per gallon (120 grams per liter). The VOC content is determined as the weight of volatile compounds, less water and exempt compounds as specified in COMAR 26.11.36.06. [Reference: COMAR 26.11.35.04G, Table 1, footnote]
- (4) The Permittee shall not use materials for surface preparation containing VOCs unless the VOC content of the surface preparation solvent is less than 70 grams per liter. [Reference: COMAR 26.11.36.04C(2)]
- (5) The Permittee shall not use materials containing VOCs for the removal of adhesives, sealants, or adhesive or sealant primers from surfaces other than spray application equipment, unless the composite vapor pressure of the solvent used is less than 45 millimeters of mercury at 20°C. Removal of an adhesive sealant, adhesive primer, or sealant primer from the parts of spray application equipment shall be performed according to COMAR 26.11.36.04C(5). [Reference: COMAR 26.11.36.04C(4) and (5)]
- (6) The Permittee shall store or dispose of all absorbent materials, such as cloth or paper, that are moistened with adhesives, sealants, primers, or solvents subject to COMAR 26.11.36 in nonabsorbent containers that are closed except when placing materials in or removing materials from the container. [Reference: COMAR 26.11.36.04E]

Plant Specific Conditions; Section IV**Table IV – 10****10.4 Record Keeping:****B. Control of VOC Emissions***The following conditions B(1) – B(3) apply only to the Video Inkjet Packaging Lines (MDE Registration No. 6-2018)*

- (1) The Permittee shall maintain:
 - (a) Written descriptions of all “good operating practices” designed to minimize emissions of VOC from facility-wide operations. [Reference: COMAR 26.11.19.02I]
 - (b) Records of all inspections conducted to determine the facility’s compliance status with regard to implementation of “good operating practices” designed to minimize emissions of VOC from facility-wide operations. The records shall include for each inspection the name of the inspector, the date and time of the inspection, and an account of the findings. [Reference: COMAR 26.11.03.06C]
- (2) The Permittee shall:
 - (a) Maintain a log that includes the name of the person conducting the inspection, the date on which VOC leak inspection was made, the findings of the inspection, a list of VOC leaks by tag identification number, the date the part was ordered, and the date the VOC leak was repaired; and
 - (b) Make the log available to the Department upon request and shall be maintained for a period of not less than two years from the date of the VOC leaks’ occurrence. [Reference: COMAR 26.11.19.16C(6)]
- (3) COMAR 26.11.19.18G - Record Keeping. “A person subject to this regulation shall maintain the following records for not less than 3 years, and make the records available to the Department upon request: (3) The VOC content of each ink, coating, cleanup material, or any other material containing VOC that is used at the premises.”

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): S5-7, S7-15, S7-16 (Section 10)**Compliance Methods for the Above (Description and Citation):****Plant Specific Conditions; Section IV****Table IV – 10****10.5 Reporting Requirements:****B. Control of VOC Emissions**

The following conditions B(1) and B(2) apply only to the Video Inkjet Packaging Lines (MDE Registration No. 6-2018)

- (1) Good operating practices information as required by COMAR 26.11.19.02I shall be made available to the Department upon request
- (2) VOC Leak inspection logs as required by COMAR 26.11.19.16 shall be made available to the Department upon request.

The following condition B(3) applies only to the Packaging Adhesive Fugitives Lines only (MDE Registration No. 9-1298)

- (3) The Permittee shall report all occurrences of excess emissions to the Department. [Reference: COMAR 26.11.01.07]

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Ion Exchange System (Section 11)**Permit Term (Describe requirements and cross-reference):****Plant Specific Conditions; Section IV****Table IV – 11****11.1 Applicable Standards/Limits:****A. Control of Visible Emissions**

COMAR 26.11.06.02C(2) - Visible Emissions. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06.02 A(2) - General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Compliance Methods for the Above (Description and Citation):**Plant Specific Conditions; Section IV****Table IV – 11****11.2 Testing Requirements:****A. Control of Visible Emissions**

See Record Keeping requirements

Plant Specific Conditions; Section IV**Table IV – 11****11.3 Monitoring Requirements:****A. Control of Visible Emissions**

See Record Keeping requirements

Plant Specific Conditions; Section IV**Table IV – 11****11.4 Record Keeping:**

NOTE: All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]

A. Control of Visible Emissions

The Permittee shall maintain at the facility for at least five (5) years, and shall make available to the Department upon request, records necessary to support annual certifications of emissions.

Plant Specific Conditions; Section IV**Table IV – 11****11.5 Reporting Requirements:****A. Control of Visible Emissions**

- (1) The Permittee shall submit to the Department by April 1 of each year a certification of emissions for the previous calendar year.
- (2) The Permittee shall report all occurrences of excess emissions to the Department. [Reference: COMAR 26.11.01.07]

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Ion Exchange System (Section 11)**Permit Term (Describe requirements and cross-reference):****Plant Specific Conditions; Section IV****Table IV – 11****11.1 Applicable Standards/Limits:****B. Control of Particulate Matter****(1) COMAR 26.11.06.03B(2)(a) - Particulate Matter from Confined Sources.**

"A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."

(2) COMAR 26.11.06.03C(1) - Particulate Matter from Unconfined Sources. "A person may not cause or permit emissions from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions. In making this determination, the Department shall consider technological feasibility, practicality, economic impact, and the environmental consequences of the decision."

(3) COMAR 26.11.06.03D – Particulate Matter from Material Handling and Construction. "A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from being airborne."

Compliance Methods for the Above (Description and Citation):**Plant Specific Conditions; Section IV****Table IV – 11****11.2 Testing Requirements:****B. Control of Particulate Matter**

See Record Keeping requirements

Plant Specific Conditions; Section IV**Table IV – 11****11.3 Monitoring Requirements:****B. Control of Particulate Matter**

See Record Keeping requirements

Plant Specific Conditions; Section IV**Table IV – 11****11.4 Record Keeping****B. Control of Particulate Matter**

The Permittee shall maintain the following records for at least five (5) years and shall make the records available to the Department upon request:

- (a) Annual HCl throughput for each tank and resin bed.
- (b) Annual salt throughput for each salt saturator.
- (c) All written descriptions of "good operating practices" designed to minimize emissions of HAP.
- (d) HAP leak detection and repair logs that include identification of the persons who conducted the leak detection inspections, the dates on which the inspections were conducted, the findings during the inspections, a listing by tag identification number and a description of all leaks discovered, and the date and nature of all leak repairs effected.

[Reference: MDE Permit to Construct No. 510-0314-8-0386 issued November 18, 2013]

Plant Specific Conditions; Section IV**Table IV – 11****11.5 Reporting Requirements:****B. Control of Particulate Matter**

- (1) The Permittee shall submit to the Department by April 1 of each year a certification of emissions for the previous calendar year.
- (2) The Permittee shall report all occurrences of excess emissions to the Department. [Reference: COMAR 26.11.01.07]

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U11-2 - 100 KW Emergency Generator (Section 12) ---
NOTE: Replaced with a 250 KW Emergency Generator, based on an April 23, 2020
Administrative Completeness Letter

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 12

12.1 Applicable Standards/Limits

A. Control of Visible Emissions

COMAR 26.11.09.05E, Stationary Internal Combustion Engine Powered Equipment.

- (1) "E(2)" Emissions During Idle Mode. A person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (2) Emissions During Operating Mode. A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (3) Exceptions.
 - (a) Section E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing exhaust system.
 - (b) Section E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:
 - (i) Engines that are idled continuously when not in service: 30 minutes;
 - (ii) All other engines: 15 minutes.
 - (c) Section E(2) and (3) does not apply while maintenance, repair, or testing is being performed by qualified mechanics."

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 12

12.2 Testing Requirements:

A. Control of Visible Emissions

See Monitoring Requirements.

Plant Specific Conditions; Section IV

Table IV – 12

12.3 Monitoring Requirements:

A. Control of Visible Emissions

The Permittee shall properly operate and maintain the engines in a manner to minimize visible emissions. [Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV – 12

12.4 Recordkeeping Requirements:

NOTE: All records must be maintained for a period of 5 years [Reference: COMAR 26.11.03.06.C (5)(g)].

- A. Control of Visible Emissions. The Permittee shall retain records of preventive maintenance on site for at least five years and make these records available to the Department upon request. [Reference: COMAR 26.11.03.06C]

Plant Specific Conditions; Section IV

Table IV – 12

12.5 Reporting Requirements:

A. Control of Visible Emissions

The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations."

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U11-2 - 100 KW Emergency Generator (Section 12) ---
NOTE: Replaced with a 250 KW Emergency Generator, based on an April 23, 2020
Administrative Completeness Letter

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 12

12.1 Applicable Standards/Limits

B. Control of Sulfur Oxide Emissions

COMAR 26.11.09.07A(2) - Sulfur Content Limitations for Fuel. "A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: In Areas III and IV: (b) Distillate fuel oils, 0.3 percent."

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 12

12.2 Testing Requirements:

B. Control of Sulfur Oxide Emissions

See Monitoring Requirements.

Plant Specific Conditions; Section IV

Table IV – 12

12.3 Monitoring Requirements:

B. Control of Sulfur Oxide Emissions

The Permittee shall obtain a certification from the fuel supplier indicating that the oil complies with the limitation on the sulfur content of the fuel oil.
[Reference: COMAR 26.11.03.06C].

Plant Specific Conditions; Section IV

Table IV – 12

12.4 Recordkeeping Requirements:

B. Control of Sulfur Oxide Emissions

The Permittee shall maintain records of fuel supplier's certification and shall make records available to the Department upon request. [Reference: COMAR 26.11.03.06C].

Plant Specific Conditions; Section IV

Table IV – 12

12.5 Reporting requirements:

B. Control of Sulfur Oxide Emissions

The Permittee shall report fuel supplier certification to the Department upon request [Reference: COMAR 26.11.09.07C].

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U11-2 - 100 KW Emergency Generator (Section 12) ---
NOTE: Replaced with a 250 KW Emergency Generator, based on an April 23, 2020
Administrative Completeness Letter

Permit Term (Describe requirements and cross-reference):

Plant Specific Conditions; Section IV

Table IV – 12

12.1 Applicable Standards/Limits

C. Control of Nitrogen Oxide Emissions

COMAR 26.11.09.08G(1) - Requirements for Fuel-Burning Equipment with a Capacity Factor of 15 Percent or Less, and Combustion Turbines with a Capacity Factor Greater than 15 Percent. "A person who owns or operates fuel-burning equipment with a capacity factor (as defined in 40 CFR Part 72.2) of 15 percent or less shall:

- (a) Provide certification of the capacity factor of the equipment to the Department in writing;
- (b) For fuel-burning equipment that operates more than 500 hours during a calendar year, perform a combustion analysis and optimize combustion at least once annually;
- (c) Maintain the results of the combustion analysis at the site for at least 2 years and make these results available to the Department and the EPA upon request;
- (d) Require each operator of an installation, except combustion turbines, to attend operator training programs at least once every 3 years, on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors.
- (e) Maintain a record of training program attendance for each operator at the site, and make these records available to the Department upon request.

Note: COMAR 26.11.09.08B(5)(a) states that "for the purpose of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation."

Compliance Methods for the Above (Description and Citation):

Plant Specific Conditions; Section IV

Table IV – 12

12.2 Testing Requirements:

C. Control of Nitrogen Oxide Emissions

The Permittee shall perform a combustion analysis and optimize combustion at least once annually for any of the engines that operates more than 500 hours during a calendar year. [Reference: COMAR 26.11.09.08G(1)(b)].

Plant Specific Conditions; Section IV

Table IV – 12

12.3 Monitoring Requirements:

C. Control of Nitrogen Oxide Emissions

The Permittee shall calculate the capacity factor within 30 days after the end of each month. If any engine operates more than 500 hours during a calendar year, the Permittee shall perform a combustion analysis and optimize combustion at least once every year. [Reference: COMAR 26.11.03.06C].

Plant Specific Conditions; Section IV

Table IV – 12

12.4 Recordkeeping Requirements:

C. Control of Nitrogen Oxide Emissions

- (1) The Permittee shall maintain a record of the calculated capacity factor.
- (2) For any engine that operates more than 500 hours in a calendar year, the Permittee shall maintain records of the results of the combustion analyses on site for at least five years and make them available to the Department and EPA upon request. [Reference: COMAR 26.11.09.08G(1)(e) & COMAR 26.11.03.06C].
- (3) The Permittee shall maintain record of training program attendance for each operator on site for at least five years and make the records available to the Department upon request. [Reference: COMAR 26.11.09.08G(e) & COMAR 26.11.03.06C].

Plant Specific Conditions; Section IV

Table IV – 12

12.5 Reporting requirements:

C. Control of Nitrogen Oxide Emissions

The Permittee shall submit records of combustion analysis and combustion analysis performed and capacity factor of the equipment to the Department as part of the April 1 certification report. [Reference: COMAR 26.11.03.06C].

The Permittee shall submit a list of trained operators to the Department upon request. [Reference: COMAR 26.11.09.08G(e) and COMAR 26.11.03.06C].

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

June 19, 2020 Permit to Construct for the bulk packaging (1-ton bag) line consisting of scroll conveyor and 7,400-lb holding tank**Permit Term (Describe requirements and cross-reference):****Applicable Standards/Limits:****A. Control of Visible Emissions**

COMAR 26.11.06.02C(2), Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06A(2), General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period."

B. Control of Particulate Matter

COMAR 26.11.06.03B(2)(a), Particulate Matter from Confined Sources. "A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."

COMAR 26.11.06.03D, Particulate Matter from Materials Handling and Construction. "A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne."

Compliance Methods for the Above (Description and Citation):**Testing Requirements:****Control of Visible Emissions and Control of Particulate Matter**

See Monitoring Requirements.

Monitoring Requirements:**A. Control of Visible Emissions:**

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. [Reference: COMAR 26.11.03.06]
- (5) The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06]

B. Control of Particulate Matter:

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and
- (2) a log with records of the dates and description of maintenance activity performed.

[Reference: COMAR 26.11.03.06C]

Recordkeeping Requirements:**Control of Visible Emissions and Control of Particulate Matter**

See Monitoring Requirements.

Reporting Requirements:**Control of Visible Emissions and Control of Particulate Matter**

See Monitoring Requirements.

COMAR 26.11.01.07C, Report of Excess Emissions.

(1) "In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone."

(2) "Telephone reports of excess emissions shall include the following information:

- (a) The identity of the installation and the person reporting;
- (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides);
- (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and
- (d) The actual or probable cause of the excess emissions."

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

February 25, 2021 Permit to Construct for four (4) 3.75-million-pound storage silos with bin vents and associated bucket elevator and three (3) belt conveyors controlled by a new dust collector ----- STILL UNDER CONSTRUCTION

Permit Term (Describe requirements and cross-reference):

Applicable Standards/Limits:

A. Control of Visible Emissions

COMAR 26.11.06.02C(2), Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06A(2), General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period."

B. Control of Particulate Matter

COMAR 26.11.06.03B(2)(a), Particulate Matter from Confined Sources. "A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."

COMAR 26.11.06.03D, Particulate Matter from Materials Handling and Construction. "A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne."

Compliance Methods for the Above (Description and Citation):

Testing Requirements:

Control of Visible Emissions and Control of Particulate Matter

See Monitoring Requirements.

Monitoring Requirements:

A. Control of Visible Emissions:

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. [Reference: COMAR 26.11.03.06]
- (5) The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06]

B. Control of Particulate Matter:

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and
- (2) a log with records of the dates and description of maintenance activity performed. [Reference: COMAR 26.11.03.06C]

Recordkeeping Requirements:

Control of Visible Emissions and Control of Particulate Matter

See Monitoring Requirements.

Reporting Requirements:

Control of Visible Emissions and Control of Particulate Matter

See Monitoring Requirements.

COMAR 26.11.01.07C, Report of Excess Emissions.

- (1) "In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone."
- (2) "Telephone reports of excess emissions shall include the following information:
 - (a) The identity of the installation and the person reporting;
 - (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides);
 - (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and
 - (d) The actual or probable cause of the excess emissions."

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

April 9, 2021 Permit to Construct for the modification of the existing filler system powdered sugar packaging line [including S6-71: 1-4 10X Filler System] (MDE Reg No. 8-0225) which vents to the Wheelabrator Dry Filler (MDE Reg. No. 8-0296) with the addition of two (2) new Hayssen VFFS bagger/filler systems to replace the four (4) Bosch VFFS bagger/filler systems (end-of-life)

Permit Term (Describe requirements and cross-reference):

Applicable Standards/Limits:

A. Control of Visible Emissions

COMAR 26.11.06.02C(2), Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06A(2), General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period."

B. Control of Particulate Matter

COMAR 26.11.06.03B(2)(a), Particulate Matter from Confined Sources. "A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."

COMAR 26.11.06.03D, Particulate Matter from Materials Handling and Construction. "A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne."

Compliance Methods for the Above (Description and Citation):

Testing Requirements:

Control of Visible Emissions and Control of Particulate Matter

See Monitoring Requirements.

Monitoring Requirements:

A. Control of Visible Emissions:

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. [Reference: COMAR 26.11.03.06]
- (5) The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06]

B. Control of Particulate Matter:

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (1) a copy of the preventative maintenance plan for equipment installed to minimize dusting; and
- (2) a log with records of the dates and description of maintenance activity performed. [Reference: COMAR 26.11.03.06C]

Recordkeeping Requirements:

Control of Visible Emissions and Control of Particulate Matter

See Monitoring Requirements.

Reporting Requirements:

Control of Visible Emissions and Control of Particulate Matter

See Monitoring Requirements.

COMAR 26.11.01.07C, Report of Excess Emissions.

(1) "In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone."

(2) "Telephone reports of excess emissions shall include the following information:

- (a) The identity of the installation and the person reporting;
- (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides);
- (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and
- (d) The actual or probable cause of the excess emissions."

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

August 5, 2021 Permit to Construct for the installation of the Additional sugar conveyance at the Old Raw Sugar Shed [To provide additional storage capacity, two schemes were installed: (1) A traveling conveyor from the shed's shuttle RSS-1 to feed and discharge directly into the storage barge – at a maximum throughput rate of 1,200,000 lb/hr; and (2) a clam shell loader to scoop raw sugar from the barge for placement in the Old Raw Sugar Shed – at a maximum throughput rate of 250,000 lbs/hr.]

Permit Term (Describe requirements and cross-reference):

Applicable Standards/Limits:

A. Control of Visible Emissions

COMAR 26.11.06.02C(2), Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06A(2), General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period."

B. Control of Particulate Matter

COMAR 26.11.06.03C, Particulate Matter from Confined Sources. "A person may not cause or permit emissions from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation of hoods, fans, and dust collectors to enclose, capture, and vent emissions. In making this determination, the Department shall consider technological feasibility, practicality, economic impact, and the environmental consequences of the decision.

Exceptions: The following are exempt from the provisions of the above:

- (a) Iron and steel production installations which are subject to COMAR 26.11.10.04B and C;
- (b) Grain drying and grain handling installations; and
- (c) Batch-type hot-dip galvanizing installations which are subject to COMAR 26.11.12.

COMAR 26.11.06.03D, Particulate Matter from Materials Handling and Construction. "A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer."

Compliance Methods for the Above (Description and Citation):

Testing Requirements:

Control of Visible Emissions and Control of Particulate Matter

See Monitoring Requirements.

Monitoring Requirements:

A. Control of Visible Emissions:

The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:

- (1) Inspect all process and/or control equipment that may affect visible emissions;
- (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
- (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
- (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. [Reference: COMAR 26.11.03.06]
- (5) The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. [Reference: COMAR 26.11.03.06]

B. Control of Particulate Matter:

The Permittee shall maintain the following records on site for at least five (5) years and shall be made available to the Department upon request:

- (1) a record of the results of monthly inspections and the log of inspection and maintenance; and
- (2) a log with records of the dates and description of maintenance activity performed. [Reference: COMAR 26.11.03.06C]

Recordkeeping Requirements:

Control of Visible Emissions and Control of Particulate Matter

See Monitoring Requirements.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

August 5, 2021 Permit to Construct for the installation of the Additional sugar conveyance at the Old Raw Sugar Shed [To provide additional storage capacity, two schemes were installed: (1) A traveling conveyor from the shed's shuttle RSS-1 to feed and discharge directly into the storage barge – at a maximum throughput rate of 1,200,000 lb/hr; and (2) a clam shell loader to scoop raw sugar from the barge for placement in the Old Raw Sugar Shed – at a maximum throughput rate of 250,000 lbs/hr.]

Reporting Requirements:

Control of Visible Emissions and Control of Particulate Matter

See Monitoring Requirements.

COMAR 26.11.01.07C, Report of Excess Emissions.

(1) "In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone."

(2) "Telephone reports of excess emissions shall include the following information:

- (a) The identity of the installation and the person reporting;
- (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides);
- (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and
- (d) The actual or probable cause of the excess emissions."

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

C. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

Report all deviations from permit terms (whether reported previously or not) that occurred during the permit term. Cross-reference deviations already reported in the six-month report. Indicate whether each deviation is a "possible exception to compliance." Start and end period of each deviation should be in mo/day/yr, hr:min format (24-hour clock). Also, specify the date when the written deviation report was submitted (If written report required, but not submitted, leave the date field blank).

Permit Term (for Which There is a Deviation):

Section III, Plant-Wide Conditions – Part 4 – Report of Excess Emissions and Deviations – COMAR 26.11.01.07 and COMAR 26.11.03.06(C)(7)

Report of excess emissions with respect to a fire that occurred in the Raw Sugar Shed at approximately 3:00 p.m. on April 20, 2021. The fire was brought under control after several hours, with the Baltimore City Fire Department working hot spot flare ups through April 24, 2021.

Emission Units (Unit IDs): Raw Sugar Shed (R29-2)

Deviation Start: 4/20/2021 at 15:00 End: 4/24/2021 at 12:00 (93 hours)

Probable Cause: The cause of the fire was considered to be accidental. The fire was contained to the Raw Sugar Shed, including conveyor belts RSB-6 and RSB-9 and shuttle belt RSS-3. The Raw Sugar Shed was a metal hangar-type structure (with no insulation). The main content of the building was raw sugar cane. The belts were constructed of metal, with rubber conveyors. It is believed that a bad bearing associated with a conveyor was the cause of the fire.

Corrective Actions or Preventive Measures Taken: ASR performed a clean-up of the remains of the fire to reduce the potential for further excess emissions. ASR also conducted a full investigation of the fire and its causes. The results of the investigation were used to allow ASR to determine appropriate actions to reduce, eliminate, and prevent recurrence of this type of event.

Date Written Report Submitted: April 28, 2021 written report to MDE, following an initial verbal report on April 20, 2021. July 29, 2021 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Section IV, Part 1.5B(2) and (3) – Control of Nitrogen Oxides (CEM System Downtime Reporting)
COMAR 26.11.01.11E – Control of Nitrogen Oxides – All CEM System downtime that lasts or is expected to last more than 24 hours shall be reported to the Department by 10:00 a.m. of the first regular business day following the breakdown. /// Daily calibration requirement for CEMS.

Emission Units (Unit IDs): CE Boilers 1 through 4 (C1 through C4)

Deviation Start: 4/23/2021 at 09:09 End: 4/25/2021 at 14:00 (55 hours)
(CEMS downtimes lasted for: 9 operating hours for Boiler 1; 0 operating hours for Boiler 2; 0 operating hours for Boiler 3; and 55 operating hours for Boiler 4. Daily calibrations were missed for Boilers 1, 3, and 4 on April 23, 2021. Daily calibrations were missed for all four CE Boilers 1 through 4 on April 24, 2021.)

Probable Cause of Deviation: ASR identified two main root causes for this event: CEMLink programming; and people. On the CEMLink programming side, ASR contacted VIM Technologies, Inc. (VIM) to investigate. VIM found that the CEMLink program and associated data had been completely erased from the PLC, which provided an indication that the PLC had either been flashed or surged. The last of the alert

messaging from the CEMLink system was identified to be at 9:09 a.m. on Friday, April 23, 2021, after which it appears that the operating CEMS lost communication contact with the PLC. ASR Corporate IT investigated the timeline internally and did not find any unusual events or activities around that time. As such, ASR believes that there must have been a power surge or some other atypical event that was associated with operations while the Baltimore City Fire Department was still on-site dealing with hot spots from the fire.

From the people side, it was identified that the Control Techs had been evacuated from the CEMS area of the Powerhouse as well as from their I&E Shop between 8:30 and 9:00 a.m. due the need to remove the metal structure from the top of the adjacent Raw Sugar Shed fire to allow Baltimore City Fire Department better access to the hot spots. The Control Techs had called the Environmental Manager to explain that the calibration would need to be completed at a later time that day due to safety concerns. As such, only two of the five boilers were calibrated in the morning on April 23, 2021. When the CEMS communication was lost, there were no on-going alarms as reminders for either the Control Techs or the Environmental Manager to complete the calibrations on April 23, 2021 or to verify the calibrations for April 24, 2021. With all of the other concerns related to the fire, the Environmental Manager did not realize that there was an issue until April 25, 2021.

Corrective Actions or Preventive Measures Taken: Upon discovery of the issue, ASR took immediate action to contact VIM to determine the root cause and to do short-term containment by restoring the CEMLink program. Once restored, ASR Control Techs completed the CEMS calibrations for April 25, 2021 and stopped the downtime. ASR has been vigilant in monitoring the CEMS reporting since this event and there have not been any further issues. With the CEMLink program back in place, the alarms and notifications have been triggering properly. The Environmental Manager provided a communication to the Control Techs regarding this incident and the watch-outs to prevent this from recurring.

Date Written Report Submitted: May 3, 2021 written report to MDE, following an initial verbal report on April 26, 2021. July 29, 2021 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Section IV, Part 2.5B(6) and (7) – Control of Nitrogen Oxides (CEM System Downtime Reporting)
COMAR 26.11.01.11E – Control of Nitrogen Oxides – All CEM System downtime that lasts or is expected to last more than 24 hours shall be reported to the Department by 10:00 a.m. of the first regular business day following the breakdown. /// Daily calibration requirement for CEMS.

Emission Units (Unit IDs): Boiler 6 (C6)

Deviation Start: 4/23/2021 at 09:09 End: 4/25/2021 at 14:00 (55 hours)
(CEMS downtimes lasted for 0 operating hours for Boiler 6. Daily calibration was missed for Boiler 6 on April 24, 2021.)

Probable Cause of Deviation: ASR identified two main root causes for this event: CEMLink programming; and people. On the CEMLink programming side, ASR contacted VIM Technologies, Inc. (VIM) to investigate. VIM found that the CEMLink program and associated data had been completely erased from the PLC, which provided an indication that the PLC had either been flashed or surged. The last of the alert messaging from the CEMLink system was identified to be at 9:09 a.m. on Friday, April 23, 2021, after which it appears that the operating CEMS lost communication contact with the PLC. ASR Corporate IT investigated the timeline internally and did not find any unusual events or activities around that time. As such, ASR believes that there must have been a power surge or some other atypical event that was associated with operations while the Baltimore City Fire Department was still on-site dealing with hot spots from the fire.

From the people side, it was identified that the Control Techs had been evacuated from the CEMS area of the Powerhouse as well as from their I&E Shop between 8:30 and 9:00 a.m. due the need to remove the

metal structure from the top of the adjacent Raw Sugar Shed fire to allow Baltimore City Fire Department better access to the hot spots. The Control Techs had called the Environmental Manager to explain that the calibration would need to be completed at a later time that day due to safety concerns. As such, only two of the five boilers were calibrated in the morning on April 23, 2021. When the CEMS communication was lost, there were no on-going alarms as reminders for either the Control Techs or the Environmental Manager to complete the calibrations on April 23, 2021 or to verify the calibrations for April 24, 2021. With all of the other concerns related to the fire, the Environmental Manager did not realize that there was an issue until April 25, 2021.

Corrective Actions or Preventive Measures Taken: Upon discovery of the issue, ASR took immediate action to contact VIM to determine the root cause and to do short-term containment by restoring the CEMLink program. Once restored, ASR Control Techs completed the CEMS calibrations for April 25, 2021 and stopped the downtime. ASR has been vigilant in monitoring the CEMS reporting since this event and there have not been any further issues. With the CEMLink program back in place, the alarms and notifications have been triggering properly. The Environmental Manager provided a communication to the Control Techs regarding this incident and the watch-outs to prevent this from recurring.

Date Written Report Submitted: May 3, 2021 written report to MDE, following an initial verbal report on April 26, 2021. July 29, 2021 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Section IV, Part 1.1.A(1) – Visible Emissions

COMAR 26.11.09.05A(3) – Visible Emissions – Erratic air flow to Combustion Engineering (CE) Boiler 1 during load change with No. 2 fuel oil resulted in visible emissions greater than 40% opacity.

Emission Units (Unit IDs): Combustion Engineering (CE) Boiler 1 (C-1)

Deviation Start: 11/16/2021 at 09:40 End: 11/16/2021 at 09:41 (approximately 1 minute)
11/16/2021 at 13:50 End: 11/16/2021 at 13:51 (approximately 1 minute)

Probable Cause of Deviation: Boiler 1 (C1) was being fired with No. 2 fuel oil as part of the BGE natural gas curtailment test. During the test, the control air flow to the fuel oil valve was found to be acting somewhat erratically at several points, upsetting the fuel mixture to the burner. Although the Powerhouse Operator was able to compensate the control air flow during most of the test, there were two less than 1-minute periods (at approximately 9:40 a.m. and 1:50 p.m.), where there were emissions of black smoke due to a fuel-rich mixture to the burner. Investigation identified that the control airline had a partial blockage, which was resulting in the erratic flow.

Corrective Actions or Preventive Measures Taken: Following the curtailment testing period (which occurred right after the second black smoke incident), Boiler 1 was immediately shutdown from the combustion of No. 2 fuel oil. Upon inspection of the control airline and identification of the blockage, the control airline was completely replaced with a new airline to prevent recurrence of this condition at Boiler 1. To prevent further recurrence of this type of incident at this boiler and the others, an additional corrective action will include the implementation of a verification of the control airlines prior to every start-up for No. 2 fuel oil.

Date Written Report Submitted: November 22, 2021 written report to MDE, following an initial verbal report on November 16, 2021. January 28, 2022 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Table IV-1, 1.2B, COMAR 26.11.03.06C

Emission Units (unit IDs): CE Boilers 2 and 4 (C2 and C4)

Deviation Start: 3/31/2021 at 09:00 End: 3/31/2021 at 14:10 (5 hours, 10 minutes)

Probable Cause of Deviation: The PM stack testing with No. 2 fuel oil was run at the highest operations that the Powerhouse could obtain. That operation (78% for Boiler 2 (C2) and 75% for Boiler 4 (C4)) is less than 90% of the rated capacity of the boilers, due to their age. Comparison with typical operating ranges for these boilers is being made.

Corrective Actions or Preventative Measures Taken:

Comparison with typical operational ranges for these boilers is being made. Due to age, it does not appear that the CE Boilers are capable of reaching 90% of the rated boiler capacities when combusting No. 2 fuel oil.

Date Written Report Submitted: July 29, 2021 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Section IV, Part 1.5D(2) – Control of Nitrogen Oxides (CEM System Downtime Reporting)

Emission Units (unit IDs): CE Boiler 1 (C1)

Deviation Start: 1/4/2021 at 06:00 End: 1/4/2021 at 09:00 (3 hours (< 24 hours))

Probable Cause of Deviation: The 3-hour downtime was due to a failed automatic calibration that was not immediately identified and corrected through a manual calibration. Being the first day back from a long weekend, the I&E Control Tech was distracted with other plant start-up issues.

Corrective Actions or Preventative Measures Taken:

Since the total time to achieve calibration took 3 hours of time, reinforced through additional training to on-site I&E Control Techs that calibration needs to be achieved as quickly as possible and without delays if possible (even if there are other plant start-up issues).

Date Written Report Submitted: July 29, 2021 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Section IV, Part 1.5D(2) – Control of Nitrogen Oxides (CEM System Downtime Reporting)

Emission Units (unit IDs): CE Boiler 4 (C4)

Deviation Start: 1/4/2021 at 06:00 End: 1/4/2021 at 10:00 (4 hours (< 24 hours))

Probable Cause of Deviation: The 4-hour downtime was due to a failed automatic calibration that was not immediately identified and corrected through a manual calibration. Being the first day back from a long weekend, the I&E Control Tech was distracted with other plant start-up issues.

Corrective Actions or Preventative Measures Taken:

Since the total time to achieve calibration took 4 hours of time, reinforced through additional training to on-site I&E Control Techs that calibration needs to be achieved as quickly as possible and without delays if possible (even if there are other plant start-up issues).

Date Written Report Submitted: July 29, 2021 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Section IV, Part 1.5D(2) – Control of Nitrogen Oxides (CEM System Downtime Reporting)

Emission Units (unit IDs): CE Boiler 1 (C1)

Deviation Start: 1/11/2021 at 10:00 End: 1/11/2021 at 21:00 (11 hours (< 24 hours))

Probable Cause of Deviation: The 11-hour downtime was due to a loss of calibration gas, multiple failed calibrations, and the need to replace the gas cylinder before the calibration was achieved that day.

Corrective Actions or Preventative Measures Taken:

Since the total time to achieve calibration took multiple steps and 11 hours of time, reinforced through additional training to on-site I&E Control Techs that calibration needs to be achieved as quickly as possible and without delays if possible.

Date Written Report Submitted: July 29, 2021 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Table IV-1, 1.2B, COMAR 26.11.03.06C

Emission Units (unit IDs): CE Boilers 1 and 3 (C1 and C3)

Deviation Start: 12/16/2021 at 09:20 End: 12/16/2021 at 15:20 (6 hours)

Probable Cause of Deviation: The PM stack testing with No. 2 fuel oil was run at the highest operations that the Powerhouse could obtain. That operation (76% for Boiler 1 (C1) and 80% for Boiler 3 (C3)) is less than 90% of the rated capacity of the boilers, due to their age. Comparison with typical operating ranges for these boilers is being made.

Corrective Actions or Preventative Measures Taken:

Comparison with typical operational ranges for these boilers is being made. Due to age, it does not appear that the CE Boilers are capable of reaching 90% of the rated boiler capacities when combusting No. 2 fuel oil.

Date Written Report Submitted: January 28, 2022 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Section IV, Part 1.5D(2) – Control of Nitrogen Oxides (CEM System Downtime Reporting)

Emission Units (unit IDs): CE Boiler 1 (C1)

Deviation Start: 11/17/2021 at 10:00 End: 11/17/2021 at 13:59 (4 hours (< 24 hours))

Probable Cause of Deviation: The 4-hour downtime occurred during a quarterly CEMTEK maintenance visit, when more extensive maintenance was needed.

Corrective Actions or Preventative Measures Taken:

This maintenance was part of the CEMTEK quarterly maintenance program for the CEMS. Since the total time to achieve maintenance took 4 hours of time, reinforced with CEMTEK the need to minimize downtime wherever practicable.

Date Written Report Submitted: January 28, 2022 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Section IV, Part 1.5D(2) – Control of Nitrogen Oxides (CEM System Downtime Reporting)

Emission Units (unit IDs): CE Boiler 2 (C2)

Deviation Start: 11/17/2021 at 10:00 End: 11/17/2021 at 13:59 (4 hours (< 24 hours))

Probable Cause of Deviation: The 4-hour downtime occurred during a quarterly CEMTEK maintenance visit, when more extensive maintenance was needed.

Corrective Actions or Preventative Measures Taken:

This maintenance was part of the CEMTEK quarterly maintenance program for the CEMS. Since the total time to achieve maintenance took 4 hours of time, reinforced with CEMTEK the need to minimize downtime wherever practicable.

Date Written Report Submitted: January 28, 2022 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Section IV, Part 1.5D(2) – Control of Nitrogen Oxides (CEM System Downtime Reporting)

Emission Units (unit IDs): CE Boiler 3 (C3)

Deviation Start: 9/16/2021 at 06:00 End: 9/16/2021 at 13:59 (8 hours (< 24 hours))

Probable Cause of Deviation: The 8-hour downtime was due to a failed calibration that required a follow-up secondary manual calibration and/or due to a CEMS maintenance need. The longer downtime required further intervention and changing of gas cylinders before calibration could be achieved.

Corrective Actions or Preventative Measures Taken:

Since the total time to achieve calibration took 8 hours of time, reinforced through additional training to on-site I&E Control Techs that calibration needs to be achieved as quickly as possible and without delays if possible.

Date Written Report Submitted: January 28, 2022 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Section IV, Part 1.5D(2) – Control of Nitrogen Oxides (CEM System Downtime Reporting)

Emission Units (unit IDs): CE Boiler 3 (C3)

Deviation Start: 9/17/2021 at 06:00 End: 9/17/2021 at 09:59 (4 hours (< 24 hours))

Probable Cause of Deviation: The 4-hour downtime was due to a failed calibration that required a follow-up secondary manual calibration and/or due to a CEMS maintenance need. The longer downtime required further intervention before calibration could be achieved.

Corrective Actions or Preventative Measures Taken:

Since the total time to achieve calibration took 4 hours of time, reinforced through additional training to on-site I&E Control Techs that calibration needs to be achieved as quickly as possible and without delays if

possible.

Date Written Report Submitted: January 28, 2022 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Section IV, Part 1.5D(2) – Control of Nitrogen Oxides (CEM System Downtime Reporting)

Emission Units (unit IDs): CE Boiler 3 (C3)

Deviation Start: 11/17/2021 at 10:00 End: 11/17/2021 at 13:59 (4 hours (< 24 hours))

Probable Cause of Deviation: The 4-hour downtime occurred during a quarterly CEMTEK maintenance visit, when more extensive maintenance was needed.

Corrective Actions or Preventative Measures Taken:

This maintenance was part of the CEMTEK quarterly maintenance program for the CEMS. Since the total time to achieve maintenance took 4 hours of time, reinforced with CEMTEK the need to minimize downtime wherever practicable.

Date Written Report Submitted: January 28, 2022 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Section IV, Part 1.5D(2) – Control of Nitrogen Oxides (CEM System Downtime Reporting)

Emission Units (unit IDs): CE Boiler 4 (C4)

Deviation Start: 7/12/2021 at 06:00 End: 7/12/2021 at 11:59 (6 hours (< 24 hours))

Probable Cause of Deviation: The 6-hour downtime was due to a failed automatic calibration that was not immediately identified and corrected through a manual calibration. As it occurred during a start-up period with more limited resources, the I&E Control Tech was distracted with other plant start-up issues.

Corrective Actions or Preventative Measures Taken:

Since the total time to achieve calibration took 6 hours of time, reinforced through additional training to on-site I&E Control Techs that calibration needs to be achieved as quickly as possible and without delays if possible (even if there are other plant start-up issues).

Date Written Report Submitted: January 28, 2022 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Table IV-2, 2.3B, COMAR 26.11.01.11C, and NSPS (40 CFR Part 60, Appendix F)

Emission Units (unit IDs): Babcox and Wilcox Boiler 6 (C6)

Deviation Start: 7/12/2021 at 06:00 End: 7/12/2021 at 11:59 (6 hours (< 24 hours))

Probable Cause of Deviation: The 6-hour downtime was due to a failed automatic calibration that was not immediately identified and corrected through a manual calibration. As it occurred during a start-up period with more limited resources, the I&E Control Tech was distracted with other plant start-up issues.

Corrective Actions or Preventative Measures Taken:

Since the total time to achieve calibration took 6 hours of time, reinforced through additional training to on-

site I&E Control Techs that calibration needs to be achieved as quickly as possible and without delays if possible (even if there are other plant start-up issues).

Date Written Report Submitted: January 28, 2022 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Table IV-2, 2.3B, COMAR 26.11.01.11C, and NSPS (40 CFR Part 60, Appendix F)

Emission Units (unit IDs): Babcox and Wilcox Boiler 6 (C6)

Deviation Start: 8/18/2021 at 05:00 End: 8/18/2021 at 16:59 (12 hours (< 24 hours))

Probable Cause of Deviation: The 12-hour downtime was due to a failed automatic calibration that was not immediately identified and corrected through a manual calibration due to equipment issues. CEMTEK was brought in to help with the equipment repair.

Corrective Actions or Preventative Measures Taken:

Since the total time to achieve calibration took 12 hours of time, reinforced through additional training to on-site I&E Control Techs that calibration needs to be achieved as quickly as possible and without delays if possible, such that CEMTEK can be brought in in a timely manner, if needed.

Date Written Report Submitted: January 28, 2022 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Table IV-2, 2.3B, COMAR 26.11.01.11C, and NSPS (40 CFR Part 60, Appendix F)

Emission Units (unit IDs): Babcox and Wilcox Boiler 6 (C6)

Deviation Start: 10/10/2021 at 06:00 End: 10/10/2021 at 11:59 (6 hours (< 24 hours))

Probable Cause of Deviation: The 6-hour downtime was due to a failed calibration that required a follow-up secondary manual calibration and/or due to a CEMS maintenance need. The longer downtime required further intervention before calibration could be achieved.

Corrective Actions or Preventative Measures Taken:

Since the total time to achieve calibration took 6 hours of time, reinforced through additional training to on-site I&E Control Techs that calibration needs to be achieved as quickly as possible and without delays if possible.

Date Written Report Submitted: January 28, 2022 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Table IV-2, 2.3B, COMAR 26.11.01.11C, and NSPS (40 CFR Part 60, Appendix F)

Emission Units (unit IDs): Babcox and Wilcox Boiler 6 (C6)

Deviation Start: 10/12/2021 at 06:00 End: 10/12/2021 at 08:59 (3 hours (< 24 hours))

Probable Cause of Deviation: The 3-hour downtime was due to a failed calibration that required a follow-up secondary manual calibration and/or due to a CEMS maintenance need. The longer downtime required further intervention before calibration could be achieved.

Corrective Actions or Preventative Measures Taken:

Since the total time to achieve calibration took 3 hours of time, reinforced through additional training to on-site I&E Control Techs that calibration needs to be achieved as quickly as possible and without delays if possible.

Date Written Report Submitted: January 28, 2022 Semi-Annual Title V Monitoring Report.

Permit Term (for Which There is a Deviation):

Table IV-2, 2.3B, COMAR 26.11.01.11C, and NSPS (40 CFR Part 60, Appendix F)

Emission Units (unit IDs): Babcox and Wilcox Boiler 6 (C6)

Deviation Start: 10/13/2021 at 06:00 End: 10/13/2021 at 09:59 (4 hours (< 24 hours))

Probable Cause of Deviation: The 4-hour downtime was due to a failed calibration that required a follow-up secondary manual calibration and/or due to a CEMS maintenance need. The longer downtime required further intervention before calibration could be achieved.

Corrective Actions or Preventative Measures Taken:

Since the total time to achieve calibration took 4 hours of time, reinforced through additional training to on-site I&E Control Techs that calibration needs to be achieved as quickly as possible and without delays if possible.

Date Written Report Submitted: January 28, 2022 Semi-Annual Title V Monitoring Report.

INSTRUCTIONS FOR A-COMP ANNUAL COMPLIANCE CERTIFICATION

Information Collection Burden Estimates

The public reporting and recordkeeping burden for this collection of information is estimated to average 247 hours per respondent per year. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

DETAILED INSTRUCTIONS

Submit this form along with a certification of truth, accuracy and completeness by a responsible official on an annual basis.

Section A (General Information)

Name and address should be consistent with information provided previously. The contact person should be a person familiar with the day-to-day operation of the facility, such as a plant site manager or other individual, who should be available to be contacted by the permitting authority. If there is more than one contact person, list the others on an attachment.

The reporting period must be at least every 12 months, but your permit may require this more frequently.

Section B (Compliance Status)

Description of Permit Term: Include each permit terms that imposes a requirement or action (emission limitations, standards, monitoring, recordkeeping, reporting, and other requirements on one or more emission units or on the facility. You will likely have to complete this section numerous times to include all requirements in the permit.

The emissions unit ID(s) should be those defined in the permit or in section I of form GIS. If the requirements, including compliance methods, apply in the same way to multiple emission units, you may list multiple units for a particular requirement. Emission units and requirements may be grouped if they apply the same way at all units in the group, the same compliance methods apply to all, and all units have the same compliance status.

Citations to the requirements should unambiguously identify the permit term to the lowest level.

Compliance Methods: List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the permit term described above. Also, describe and cross-reference these compliance methods.

To describe monitoring, indicate the monitoring device, what is being monitored, averaging time, frequency, and cross-reference the permit term. To describe recordkeeping, describe the records kept, collection frequency, and cross-reference the permit term. Please indicate if monitoring data results or compliance records are kept on-site rather than reported. To describe reporting requirements, describe what is reported, when it is reported, and cross-reference the permit term.

The citation or cross-reference here must unambiguously identify the requirement to the lowest level.

Compliance Status: For each permit requirement and its associated compliance methods, indicate whether there was intermittent or continuous compliance (check one) during the reporting period. You should consider all available information or knowledge that you have when evaluating this, including compliance methods required by the permit and "credible evidence" (e.g., non-reference test methods and information "readily available" to you). You are always free to include written explanations and other information to clarify your conclusion regarding compliance status.

You must include permit terms that were not effective or not applicable (e.g., future-effective requirements, compliance options, and alternative scenarios). You may certify to continuous compliance for these if there is no evidence of noncompliance.

Absent evidence to the contrary, you may certify continuous compliance based on the data provided by the compliance methods, provided you did not fail to perform them and there were no unexcused deviations. Any failure to meet any permit term for any period of time indicates intermittent compliance. You may also indicate "undetermined compliance," if you include the reason.

Section C (Deviations From Permit Terms and Conditions)

Summarize all deviations from permit terms that occurred since the last compliance certification. They may have been reported previously in-writing or they may be reported concurrently with this certification. Also include any deviations that have not yet been reported in writing.

Copy this page as many times as necessary to include all deviations that occurred during the reporting period for this compliance certification.

Deviations occur when any permit term is not met, including emission limitations, standards, monitoring, recordkeeping, reporting and other requirements. For a more detailed explanation of the term "deviation." See the instructions for Form **SIXMON**. A deviation is not necessarily a violation. Violations are determined by EPA (or its delegate Agency).

You may cross-reference deviations previously reported (e.g., in 6-month monitoring reports).

You must indicate whether each deviation is a "possible exception to compliance." This is a deviation that occurs when compliance is required. A deviation that is not a "possible exception to compliance" is one that occurs when compliance is not required or it is excused by another permit term. If you indicate that a deviation is not a possible exception to compliance, briefly explain and cross-reference the permit term that allows or excuses it. In addition, deviations for which the permit provides an affirmative defense (e.g., emergencies) must be identified as "possible exception to compliance" because only the permitting authority may determine if the affirmative defense applies.

If the cross-reference a deviation report that does not contain all the information requested here, you must supplement it accordingly.

You may list multiple emission units if they all had the same deviation during the same time periods. In addition, for deviations that impose requirements to the permitted facility as a whole or to all units at your facility, you may enter facility-wide in the emissions unit column.

You may indicate continuous periods of deviation that span multiple days in a single entry. Use the 24-hour clock (equivalent to military time) for reporting these times (e.g., the day starts and ends at midnight, 12 a.m., or 00:00 in military time).

Specify the date when the written deviation report was submitted to the permitting authority. Leave the date field blank if you did not submit a written deviation report during the reporting period covered by the six-month monitoring report (whether required to do so or not). It is a deviation to fail to submit a required deviation report.

Form CTAC (Certification of Truth, Accuracy, and Completeness by Responsible Official)

You must complete form **CTAC** and attach it to this annual compliance certification.

ATTACHMENT D

**PERMIT TO CONSTRUCT FOR BULK
PACKAGING LINE**

From: Marcie Gurley -MDE- <marcie.gurley@maryland.gov>

Sent: Monday, June 22, 2020 12:35 PM

To: Karen A Bakker <Karen.Bakker@asr-group.com>

Subject: Fwd: Permit to Construct for American Sugar Refining

*** CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Karen,

This forwarded email is the approved permit to construct for the bulk packaging line with an issue date of June 19, 2020. Thanks.



Marcellina Gurley

Unit Lead, Reg. and Compliance Engineer
Air and Radiation Administration
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230
marcie.gurley@maryland.gov
410-537-3230 (O)
[Website](#) | [Facebook](#) | [Twitter](#)

Click here to complete a three question [customer experience survey](#).

----- Forwarded message -----

From: Suna Yi Sariscak <suna.sariscak@maryland.gov>

Date: Mon, Jun 22, 2020 at 12:25 PM

Subject: Permit to Construct for American Sugar Refining

To: Marcie Gurley -MDE- <marcie.gurley@maryland.gov>

Hi Marcie,

This permit has been approved for issuance by the ARA Deputy Director and the Air Quality Permits Program Manager. Please forward the entire email and attachment to the applicant. The issue date of the permit is June 19, 2020.



Suna Yi Sariscak

Manager, Air Quality Permits Program
Air and Radiation Administration
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230
suna.sariscak@maryland.gov
410-537-4129 (O)
[Website](#) | [Facebook](#) | [Twitter](#)

----- Forwarded message -----

From: Angelo Bianca -MDE- <angelo.bianca@maryland.gov>

Date: Fri, Jun 19, 2020 at 10:14 PM

Subject: Fwd: Request for Approval to Issue a Permit to Construct to American Sugar Refining

To: Suna Sariscak -MDE- <suna.sariscak@maryland.gov>

Approved

----- Forwarded message -----

From: **Suna Yi Sariscak** <suna.sariscak@maryland.gov>

Date: Fri, Jun 19, 2020 at 12:55 PM

Subject: Request for Approval to Issue a Permit to Construct to American Sugar Refining

To: Angelo Bianca -MDE- <angelo.bianca@maryland.gov>

Hello Angelo,

I have reviewed and approved the attached permit to construct for American Sugar Refining for a bulk packaging line at their facility located at 1100 Key Highway East in Baltimore, Maryland. The permit application fee has been paid. Please reply to this email and include the attachment with your approval for issuance. Thank you.



Suna Yi Sariscak
Manager, Air Quality Permits Program
Air and Radiation Administration
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230
suna.sariscak@maryland.gov
410-537-4129 (O)
[Website](#) | [Facebook](#) | [Twitter](#)



Maryland
Department of
the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

Mr. Timothy J. Noud, Plant Manager
American Sugar Refining, Inc.
One North Clematis Street, Suite 200
West Palm Beach, FL 33401

Dear Mr. Noud:

Enclosed please find your Permit to Construct for the bulk packaging (1-ton bag) line consisting of scroll conveyor and 7,400-lb holding tank at American Sugar Refining Inc. to be located at 1100 Key Highway East, Baltimore, MD. The permit contains both general conditions, which apply to all air quality permit holders in Maryland, and specific conditions, which apply to the bulk packaging (1-ton bag) line that you have proposed to install.

The addition of bulk packaging (1-ton bag) line qualifies as an "Off-Permit" change to the facility's Title V - Part 70 Operating Permit. The Department recognizes the permit to construct application as written notification of the proposed change. Please include the bulk packaging (1-ton bag) line in the application for the next renewal of the Title V - Part 70 Operating Permit.

If you have any questions regarding this permit, please contact Marcellina Gurley of my staff at (410) 537-3230.

Sincerely,

Suna Yi Sariscak, Manager
Air Quality Permits Program
Air & Radiation Administration

SYS/jm

Enclosure

Larry Hogan
Governor

Ben Grumbles
Secretary

Air and Radiation Administration
1800 Washington Boulevard, Suite 720
Baltimore, MD 21230

☒ Construction Permit

☐ Operating Permit

PERMIT NO. 510-0314-8-0409

DATE ISSUED See email for issue date.

PERMIT FEE \$500.00 (PAID)

EXPIRATION DATE In accordance with COMAR 26.11.02.04B

LEGAL OWNER & ADDRESS

American Sugar Refining
One North Clematis Street, Suite 200
West Palm Beach, FL 33401
Attn: Mr. Timothy J. Noud, Plant Manager

SITE

American Sugar Refining
1100 Key Highway East
Baltimore, MD 21230
Premises # 510-0314
AI # 60

SOURCE DESCRIPTION

This permit authorizes the installation of one (1) Bulk Packaging (1-ton bag) Line consisting of scroll conveyor and 7,400-lb holding tank.

This source is subject to the conditions described on the attached pages.

Page 1 of 8

See email for approval.

Program Manager

See email for approval.

Director, Air and Radiation Administration

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0409**

INDEX

Part A – General Provisions
Part B – Applicable Regulations
Part C – Construction Conditions
Part D – Operating Conditions
Part E – Notifications, Testing and Monitoring
Part F – Record Keeping and Reporting

Part A – General Provisions

- (1) The following Air and Radiation Administration (ARA) permit-to-construct applications and supplemental information are incorporated into this permit by reference:
- (a) Application for Processing or Manufacturing Equipment (Form 5) received May 13, 2020 for Bulk Packaging (1-ton bag) Line consisting of scroll conveyor and 7,400-lb holding tank.
 - (b) Emission Point Data (Form 5EP) received May 13, 2020.
 - (c) Supplemental Information [Emission calculations, project description, project schematic and flow diagram] received May 13, 2020.

If there are any conflicts between representations in this permit and representations in the applications, the representations in the permit shall govern. Estimates of dimensions, volumes, emissions rates, operating rates, feed rates and hours of operation included in the applications do not constitute enforceable numeric limits beyond the extent necessary for compliance with applicable requirements.

- (2) Upon presentation of credentials, representatives of the Maryland Department of the Environment (“MDE” or the “Department”) and the Baltimore City Health Department shall at any reasonable time be granted, without delay and without prior notification, access to the Permittee’s property and permitted to:
- (a) inspect any construction authorized by this permit;
 - (b) sample, as necessary to determine compliance with requirements of this permit, any materials stored or processed on-site, any waste materials, and any discharge into the environment;
 - (c) inspect any monitoring equipment required by this permit;

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0409**

- (d) review and copy any records, including all documents required to be maintained by this permit, relevant to a determination of compliance with requirements of this permit; and
 - (e) obtain any photographic documentation or evidence necessary to determine compliance with the requirements of this permit.
- (3) The Permittee shall notify the Department prior to increasing quantities and/or changing the types of any materials referenced in the application or limited by this permit. If the Department determines that such increases or changes constitute a modification, the Permittee shall obtain a permit-to-construct prior to implementing the modification.
 - (4) Nothing in this permit authorizes the violation of any rule or regulation or the creation of a nuisance or air pollution.
 - (5) If any provision of this permit is declared by proper authority to be invalid, the remaining provisions of the permit shall remain in effect.
 - (6) The addition of the Bulk Packaging (1-ton bag) line qualifies as an "Off Permit" change to the facility's Part 70 Operating Permit. The Department recognizes the permit to construct application as written notification of the proposed change and should be included in the application for the next renewal of the Part 70 permit.

Part B – Applicable Regulations

- (1) This source is subject to all applicable federal air pollution control requirements.
- (2) This source is subject to all applicable federally enforceable State air pollution control requirements including, but not limited to, the following regulations:
 - (a) COMAR 26.11.01.05–1, General Requirements.
 - (1) "By April 1 of each year, beginning with April 1, 1993, a person subject to this regulation shall submit to the Department an emissions statement for the previous calendar year that meets the requirements of this regulation."
 - (2) "A person submitting an emissions statement shall certify that the information in the emissions statement is accurate to the person's best knowledge. The certifying individual shall be:

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0409**

- (a) Familiar with each installation and source for which the statement is submitted; and
 - (b) Responsible for the accuracy of the statement.”
- (3) “If actual emissions from a source or premises for any year after calendar year 1992 equal or exceed the applicable emission levels prescribed in §A(1) or (2) of this regulation, an emissions statement is required for that year and each following year unless the source demonstrates, to the satisfaction of the Department, that emissions have been permanently reduced and the source no longer has the potential to emit emissions that exceed the applicable levels.”
- (b) COMAR 26.11.01.07C, Report of Excess Emissions.
 - (1) “In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone.”
 - (2) “Telephone reports of excess emissions shall include the following information:
 - (a) The identity of the installation and the person reporting;
 - (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides);
 - (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and
 - (d) The actual or probable cause of the excess emissions.”
- (c) COMAR 26.11.02.04B, Permits to Construct and Approvals. ‘A permit to construct or an approval expires if, as determined by the Department:
 - (1) Substantial construction or modification is not commenced within 18 months after the date of issuance of the permit or approval, unless the Department specifies a longer period in the permit or approval;
 - (2) Construction or modification is substantially discontinued for a period of 18 months after the construction or modification has commenced; or
 - (3) The source for which the permit or approval was issued is not completed within a reasonable period after the date of issuance of the permit or approval.”
- (d) COMAR 26.11.02.09A, Sources Subject to Permits to Construct and Approvals. “A person may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits to construct and approvals: (6) All sources, including installations and air pollution control equipment, except as listed in Regulation .10 of this chapter—permit to construct required.”

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0409**

- (e) COMAR 26.11.02.19C, Information Required to be Maintained by a Source.
- (1) "Beginning January 1, 1994, the owner or operator of a source for which a permit to operate is required shall maintain records necessary to support the emission certification, including the following information:
- (a) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;
 - (b) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;
 - (c) Amounts, types, and analyses of all fuels used;
 - (d) Emission data from continuous emission monitors that are required by this subtitle or EPA regulations, including monitor calibration and malfunction information;
 - (e) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment, including significant maintenance performed, malfunctions and downtime, and episodes of reduced efficiency of this equipment;
 - (f) Limitations on source operation or any work practice standards that significantly affect emissions; and
 - (g) Other relevant information as required by the Department."
- (2) The logs and other records of information required by §C(1) of this regulation shall be retained for a period of 5 years and made available to the Department upon request."
- (3) "If the owner or operator of a source for which a permit to operate is required fails to maintain or provide the data required by this section, which the Department requests in order to verify the emissions during the previous calendar year, the annual emission-based fee for that source shall be based on the estimated allowable emissions, as defined in COMAR 26.11.01.01B(4), of that source, as determined by the Department."
- (f) COMAR 26.11.02.19D(1), Emission Certification.
"Beginning January 1, 1994, the responsible official designated by the owner or operator of a source for which a permit to operate is required shall certify, as provided at Regulation .02F of this chapter, the actual emissions of regulated air pollutants from all installations at the plant or facility."
- (g) COMAR 26.11.03.14A – Revisions of Part 70 permits – General Requirements. "The Permittee shall submit an application to the Department to revise a Part 70 permit when required under Regulations. 15-.17 of this chapter."

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0409**

- (h) COMAR 26.11.06.02C(2), Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."
- (i) COMAR 26.11.06A(2), General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:
 - (a) The visible emissions are not greater than 40 percent opacity; and
 - (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period."
- (j) COMAR 26.11.06.03B(2)(a), Particulate Matter from Confined Sources. "A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."
- (k) COMAR 26.11.06.03D, Particulate Matter from Materials Handling and Construction. "A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne."
- (3) This source is subject to all applicable State-only enforceable air pollution control requirements including, but not limited to, the following regulations:
 - (a) COMAR 26.11.06.08, Nuisance. "An installation or premises may not be operated or maintained in such a manner that a nuisance or air pollution is created. Nothing in this regulation relating to the control of emissions may in any manner be construed as authorizing or permitting the creation of, or maintenance of, nuisance or air pollution."
 - (b) COMAR 26.11.06.09, Odors. "A person may not cause or permit the discharge into the atmosphere of gases, vapors, or odors beyond the property line in such a manner that a nuisance or air pollution is created."

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0409**

Part C – Construction & Operating Conditions

- (1) Except as otherwise provided in this part, the bulk packaging (1-ton bag) line shall be constructed in accordance with specifications included in the incorporated applications.
- (2) Except as otherwise provided in this part, the bulk packaging (1-ton bag) line shall be operated in accordance with specifications included in the application and any operating procedures recommended by equipment vendors unless the Permittee obtains from the Department written authorization for alternative operating procedures.

Part D – Monitoring Requirements

- (1) The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.
- (2) If emissions in the exhaust gases are visible, the Permittee shall perform the following:
 - (a) Inspect all process and/or control equipment that may affect visible emissions;
 - (b) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated.
 - (c) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
 - (d) If visible emissions have not been eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

[Reference: COMAR 26.11.03.06C]

Part E – Record Keeping and Reporting

- (1) The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, records of the following information:

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0409**

- (a) A record of the results of the monthly inspections and the log of inspection and maintenance.
 - (b) A log with records of the dates and description of maintenance activities performed.
- (2) The Permittee shall submit to the Department by April 1 of each year a certification of emissions for the previous calendar year. The certifications shall be prepared in accordance with requirements, as applicable, adopted under COMAR 26.11.01.05 – 1 and COMAR 26.11.02.19D.
 - (a) Certifications of emissions shall be submitted on forms obtained from the Department.
 - (b) A certification of emissions shall include mass emissions rates for each regulated pollutant, and the total mass emissions rate for all regulated pollutants for each of the facility's registered sources of emissions.
 - (c) The person responsible for a certification of emissions shall certify the submittal to the Department in the following manner:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”
- (3) The Permittee shall report, in accordance with requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Administration.

ATTACHMENT E

**PERMIT TO CONSTRUCT FOR SUGAR
STORAGE SILOS**



Maryland
Department of
the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor
Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

FEB 25 2021

Mr. Timothy J. Noud, Plant Manager
American Sugar Refining, Inc.
One North Clematis Street, Suite 200
West Palm Beach, FL 33401

Dear Mr. Noud:

Enclosed please find your Permit to Construct for the four (4) storage silos equipped with bin vents, bucket elevator, and (3) belt conveyors equipped with new dust collector at American Sugar Refining Inc. to be located at 1100 Key Highway East, Baltimore, MD. The permit contains both general conditions, which apply to all air quality permit holders in Maryland, and specific conditions, which apply to the storage silos and belt conveyors that you have proposed to install.

The addition of storage silos, bucket elevator, and belt conveyors qualifies as an "Off-Permit" change to the facility's Title V - Part 70 Operating Permit. The Department recognizes the permit to construct application as written notification of the proposed change. Please include the storage silos, bucket elevator and belt conveyors in the application for the next renewal of the Title V - Part 70 Operating Permit.

If you have any questions regarding this permit, please contact Marcellina Gurley of my staff at (410) 537-3230 or marcie.gurley@maryland.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Suna Yi Sariscak".

Suna Yi Sariscak, Manager
Air Quality Permits Program
Air & Radiation Administration

SYS/jm

Enclosure

State of



Maryland

Larry Hogan
GovernorBen Grumbles
Secretary

DEPARTMENT OF THE ENVIRONMENT

Air and Radiation Administration
1800 Washington Boulevard, Suite 720
Baltimore, MD 21230☒ Construction Permit☐ Operating Permit

FEB 25 2021

PERMIT NO. 510-0314-8-0410 & -8-0411

DATE ISSUED

PERMIT FEE \$2,500.00 (PAID)

EXPIRATION DATE

In accordance with
COMAR 26.11.02.04B

LEGAL OWNER & ADDRESS

American Sugar Refining
One North Clematis Street, Suite 200
West Palm Beach, FL 33401
Attn: Mr. Timothy J. Noud, Plant Manager

SITE

American Sugar Refining
1100 Key Highway East
Baltimore, MD 21230
Premises # 510-0314
AI #60

SOURCE DESCRIPTION

This permit authorizes the installation of four (4) 3.75-million-pound storage silos equipped with bin vents [8-0411]; bucket elevator and (3) belt conveyors equipped with new dust collector [8-0410].

This source is subject to the conditions described on the attached pages.

Page 1 of 9

Program Manager

Director, Air and Radiation Administration

AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0410 & 8-0411

INDEX

- Part A – General Provisions
 - Part B – Applicable Regulations
 - Part C – Construction Conditions
 - Part D – Operating Conditions
 - Part E – Notifications, Testing and Monitoring
 - Part F – Record Keeping and Reporting
-

Part A – General Provisions

- (1) The following Air and Radiation Administration (ARA) permit-to-construct applications and supplemental information are incorporated into this permit by reference:
 - (a) Application for Processing or Manufacturing Equipment (Form 5) received November 13, 2020 for four (4) 3.75-million-pound storage silos with bin vents and one (1) associated bucket elevator and three (3) belt conveyors controlled by a new dust collector.
 - (b) Emission Point Data (Form 5EP) received November 13, 2020.
 - (c) Application for Permit to Construct Gas Cleaning or Emission Control Equipment (Form number 6) received November 13, 2020 for Silo bin vents and dust collector for bucket elevator and belt conveyors.
 - (d) Supplemental Information [Emission calculations, project description, project schematic and flow diagram] received November 13, 2020.

If there are any conflicts between representations in this permit and representations in the applications, the representations in the permit shall govern. Estimates of dimensions, volumes, emissions rates, operating rates, feed rates and hours of operation included in the applications do not constitute enforceable numeric limits beyond the extent necessary for compliance with applicable requirements.

- (2) Upon presentation of credentials, representatives of the Maryland Department of the Environment ("MDE" or the "Department") and the Baltimore City Health Department shall at any reasonable time be granted, without delay and without prior notification, access to the Permittee's property and permitted to:
 - (a) inspect any construction authorized by this permit;

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0410 & 8-0411**

- (b) sample, as necessary to determine compliance with requirements of this permit, any materials stored or processed on-site, any waste materials, and any discharge into the environment;
 - (c) inspect any monitoring equipment required by this permit;
 - (d) review and copy any records, including all documents required to be maintained by this permit, relevant to a determination of compliance with requirements of this permit; and
 - (e) obtain any photographic documentation or evidence necessary to determine compliance with the requirements of this permit.
- (3) The Permittee shall notify the Department prior to increasing quantities and/or changing the types of any materials referenced in the application or limited by this permit. If the Department determines that such increases or changes constitute a modification, the Permittee shall obtain a permit-to-construct prior to implementing the modification.
- (4) Nothing in this permit authorizes the violation of any rule or regulation or the creation of a nuisance or air pollution.
- (5) If any provision of this permit is declared by proper authority to be invalid, the remaining provisions of the permit shall remain in effect.
- (6) The addition of the four (4) storage silos equipped with bin vents; bucket elevator and (3) belt conveyors equipped with new dust collector qualifies as an "Off Permit" change to the facility's Part 70 Operating Permit. The Department recognizes the permit to construct application as written notification of the proposed change and should be included in the application for the next renewal of the Part 70 permit.

Part B – Applicable Regulations

- (1) This source is subject to all applicable federal air pollution control requirements.
- (2) This source is subject to all applicable federally enforceable State air pollution control requirements including, but not limited to, the following regulations:

AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0410 & 8-0411

- (a) COMAR 26.11.01.05–1, General Requirements.
- (1) “By April 1 of each year, beginning with April 1, 1993, a person subject to this regulation shall submit to the Department an emissions statement for the previous calendar year that meets the requirements of this regulation.”
 - (2) “A person submitting an emissions statement shall certify that the information in the emissions statement is accurate to the person’s best knowledge. The certifying individual shall be:
 - (a) Familiar with each installation and source for which the statement is submitted; and
 - (b) Responsible for the accuracy of the statement.”
 - (3) “If actual emissions from a source or premises for any year after calendar year 1992 equal or exceed the applicable emission levels prescribed in §A(1) or (2) of this regulation, an emissions statement is required for that year and each following year unless the source demonstrates, to the satisfaction of the Department, that emissions have been permanently reduced and the source no longer has the potential to emit emissions that exceed the applicable levels.”
- (b) COMAR 26.11.01.07C, Report of Excess Emissions.
- (1) “In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone.”
 - (2) “Telephone reports of excess emissions shall include the following information:
 - (a) The identity of the installation and the person reporting;
 - (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides);
 - (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and
 - (d) The actual or probable cause of the excess emissions.”
- (c) COMAR 26.11.02.04B, Permits to Construct and Approvals. ‘A permit to construct or an approval expires if, as determined by the Department:
- (1) Substantial construction or modification is not commenced within 18 months after the date of issuance of the permit or approval, unless the Department specifies a longer period in the permit or approval;
 - (2) Construction or modification is substantially discontinued for a period of 18 months after the construction or modification has commenced; or

**AMERICAN SUGAR REFINING
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PERMIT No. 510-0314-8-0410 & 8-0411**

- (3) The source for which the permit or approval was issued is not completed within a reasonable period after the date of issuance of the permit or approval."
- (d) COMAR 26.11.02.09A, Sources Subject to Permits to Construct and Approvals. "A person may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits to construct and approvals: (6) All sources, including installations and air pollution control equipment, except as listed in Regulation .10 of this chapter—permit to construct required."
- (e) COMAR 26.11.02.19C, Information Required to be Maintained by a Source.
- (1) "Beginning January 1, 1994, the owner or operator of a source for which a permit to operate is required shall maintain records necessary to support the emission certification, including the following information:
- (a) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;
 - (b) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;
 - (c) Amounts, types, and analyses of all fuels used;
 - (d) Emission data from continuous emission monitors that are required by this subtitle or EPA regulations, including monitor calibration and malfunction information;
 - (e) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment, including significant maintenance performed, malfunctions and downtime, and episodes of reduced efficiency of this equipment;
 - (f) Limitations on source operation or any work practice standards that significantly affect emissions; and
 - (g) Other relevant information as required by the Department."
- (2) The logs and other records of information required by §C(1) of this regulation shall be retained for a period of 5 years and made available to the Department upon request."
- (3) "If the owner or operator of a source for which a permit to operate is required fails to maintain or provide the data required by this section, which the Department requests in order to verify the emissions during the previous calendar year, the annual emission-based fee for that source shall be based on the estimated allowable emissions, as defined in COMAR 26.11.01.01B(4), of that source, as determined by the Department."

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PERMIT No. 510-0314-8-0410 & 8-0411**

- (f) COMAR 26.11.02.19D(1), Emission Certification.
"Beginning January 1, 1994, the responsible official designated by the owner or operator of a source for which a permit to operate is required shall certify, as provided at Regulation .02F of this chapter, the actual emissions of regulated air pollutants from all installations at the plant or facility."
 - (g) COMAR 26.11.03.14A – Revisions of Part 70 permits – General Requirements. "The Permittee shall submit an application to the Department to revise a Part 70 permit when required under Regulations. 15-.17 of this chapter."
 - (h) COMAR 26.11.06.02C(2), Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."
 - (i) COMAR 26.11.06.02A(2), General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:
 - (a) The visible emissions are not greater than 40 percent opacity; and
 - (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period."
 - (j) COMAR 26.11.06.03B(2)(a), Particulate Matter from Confined Sources. "A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."
 - (k) COMAR 26.11.06.03D, Particulate Matter from Materials Handling and Construction. "A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne."
- (3) This source is subject to all applicable State-only enforceable air pollution control requirements including, but not limited to, the following regulations:

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0410 & 8-0411**

- (a) COMAR 26.11.06.08, Nuisance. "An installation or premises may not be operated or maintained in such a manner that a nuisance or air pollution is created. Nothing in this regulation relating to the control of emissions may in any manner be construed as authorizing or permitting the creation of, or maintenance of, nuisance or air pollution."
- (b) COMAR 26.11.06.09, Odors. "A person may not cause or permit the discharge into the atmosphere of gases, vapors, or odors beyond the property line in such a manner that a nuisance or air pollution is created."

Part C – Construction & Operating Conditions

- (1) Except as otherwise provided in this part, the four (4) 3.75 million pound storage silos equipped with bin vents; one (1) bucket elevator and (3) belt conveyors equipped with new dust collector shall be constructed in accordance with specifications included in the incorporated applications.
- (2) Except as otherwise provided in this part, the four (4) storage silos equipped with bin vents; one (1) bucket elevator and (3) belt conveyors equipped with new dust collector shall be operated in accordance with specifications included in the application and any operating procedures recommended by equipment vendors unless the Permittee obtains from the Department written authorization for alternative operating procedures.
- (3) Emissions from the four (4) 3.75-million-pound storage silos shall be exhausted through each bin vent. The bin vent is a passive operation (no fan) that will be equipped with continuous differential pressure signal to the process control system.
- (4) Emissions from one (1) bucket elevator and three belt conveyors shall be captured and controlled by the new dust collector. The dust collector will have a direct drive fan with run status monitored, will be equipped with continuous differential pressure signal to the process control system.
- (5) The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. **[Reference: COMAR 26.11.03.06]**

**AMERICAN SUGAR REFINING
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Part D – Monitoring Requirements

- (1) The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.
- (2) If emissions in the exhaust gases are visible, the Permittee shall perform the following:
 - (a) Inspect all process and/or control equipment that may affect visible emissions;
 - (b) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated.
 - (c) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
 - (d) If visible emissions have not been eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.

[Reference: COMAR 26.11.03.06C]

Part E – Record Keeping and Reporting

- (1) The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, records of the following information:
 - (a) A record of the results of the monthly inspections and the log of inspection and maintenance.
 - (b) A log with records of the dates and description of maintenance activities performed.
- (2) The Permittee shall submit to the Department by April 1 of each year a certification of emissions for the previous calendar year. The certifications shall be prepared in accordance with requirements, as applicable, adopted under COMAR 26.11.01.05 – 1 and COMAR 26.11.02.19D.

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0410 & 8-0411**

- (a) Certifications of emissions shall be submitted on forms obtained from the Department.
- (b) A certification of emissions shall include mass emissions rates for each regulated pollutant, and the total mass emissions rate for all regulated pollutants for each of the facility's registered sources of emissions.
- (c) The person responsible for a certification of emissions shall certify the submittal to the Department in the following manner:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."
- (3) The Permittee shall report, in accordance with requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Administration.

**ATTACHMENT F PERMIT TO CONSTRUCT FOR 10X FILLER
SYSTEM**

From: Marcie Gurley -MDE- <marcie.gurley@maryland.gov>
Sent: Monday, April 12, 2021 9:32 AM
To: Karen A Bakker <Karen.Bakker@asr-group.com>
Subject: Fwd: Permit for Construct for American Sugar

*** CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Karen,

This forwarded email is the approved permit to construct with an issue date of April 9, 2021. If you have any questions or concerns, please let me know. Thanks.



Marcellina Gurley
Chief, Technical Division
Air and Radiation Administration
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230
marcie.gurley@maryland.gov
410-537-3230 (O)
[Website](#) | [Facebook](#) | [Twitter](#)

Click here to complete a three question [customer experience survey](#).

----- Forwarded message -----

From: Suna Yi Sariscak <suna.sariscak@maryland.gov>
Date: Mon, Apr 12, 2021 at 9:22 AM
Subject: Permit for Construct for American Sugar
To: Marcie Gurley -MDE- <marcie.gurley@maryland.gov>

Hi Marcie,

This permit has been approved for issuance by the ARA Deputy Director and the Air Quality Permits Program Manager. Please forward the entire email and attachment to the permit applicant. The issue date of the permit is April 9, 2021. Thank you.



Suna Yi Sariscak
Manager, Air Quality Permits Program
Air and Radiation Administration
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230
suna.sariscak@maryland.gov
410-537-4129 (O)
[Website](#) | [Facebook](#) | [Twitter](#)

Because of the COVID-19 virus and the need for safety precautions, many state employees are working remotely.

----- Forwarded message -----

From: Angelo Bianca -MDE- <angelo.bianca@maryland.gov>

Date: Fri, Apr 9, 2021 at 9:14 PM

Subject: Fwd: Request for Approval to Issue a Permit to Construct to American Sugar

To: Suna Sariscak -MDE- <suna.sariscak@maryland.gov>

Approved

----- Forwarded message -----

From: **Suna Yi Sariscak** <suna.sariscak@maryland.gov>

Date: Fri, Apr 9, 2021 at 4:53 PM

Subject: Request for Approval to Issue a Permit to Construct to American Sugar

To: Angelo Bianca -MDE- <angelo.bianca@maryland.gov>

Hi Angelo,

I have reviewed and approved the attached permit to construct that authorizes the modification of a filler system at American Sugar Refining located at [1100 Key Highway East](#) in Baltimore, Maryland. The permit application fee has been paid. Please reply to this email and include the attachment with your approval for issuance. Thank you.



Suna Yi Sariscak
Manager, Air Quality Permits Program
Air and Radiation Administration
Maryland Department of the Environment
[1800 Washington Boulevard](#)
[Baltimore, Maryland 21230](#)
suna.sariscak@maryland.gov
410-537-4129 (O)
[Website](#) | [Facebook](#) | [Twitter](#)

Because of the COVID-19 virus and the need for safety precautions, many state employees are working remotely.

[Click here](#) to complete a three question customer experience survey.

[Click here](#) to complete a three question customer experience survey.

[Click here](#) to complete a three question customer experience survey.



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

Mr. Timothy J. Noud
Plant Manager
American Sugar Refining, Inc.
One North Clematis Street, Suite 200
West Palm Beach, FL 33401

Dear Mr. Noud:

Enclosed please find your Permit to Construct for the modification of the existing filler system powdered sugar packaging line [including S6-71: 1-4 10X Filler System] (**MDE Reg No. 8-0225**) which vents to the Wheelabrator Dry Filler (**MDE Reg. No. 8-0296**) with the addition of two (2) new Hayssen VFFS bagger/filler systems to replace the four (4) Bosch VFFS bagger/filler systems (which reached end-of-life) located at 1100 Key Highway East, Baltimore, MD. The permit contains both general conditions, which apply to all air quality permit holders in Maryland, and specific conditions, which apply to the filler system powdered sugar packaging line that you have proposed to modify.

The modified filler system powdered sugar packaging line qualifies as an "Off-Permit" change to the facility's Title V - Part 70 Operating Permit. The Department recognizes the permit to construct application as written notification of the proposed change. Please include the modified filler system powdered sugar packaging line in the application for the next renewal of the Title V - Part 70 Operating Permit.

If you have any questions regarding this permit, please contact Marcellina Gurley of my staff at marcie.gurley@maryland.gov or (410) 537-3230.

Sincerely,

Suna Yi Sariscak, Manager
Air Quality Permits Program
Air & Radiation Administration

SYS/zc

Enclosure

Larry Hogan
Governor

Ben Grumbles
Secretary

Air and Radiation Administration
1800 Washington Boulevard, Suite 720
Baltimore, MD 21230

☒ Construction Permit

☐ Operating Permit

PERMIT NO. 510-0314-8-0225
510-0314-8-0296

DATE ISSUED See email for issue date.

PERMIT FEE \$500.00 (PAID)

EXPIRATION DATE In accordance with
COMAR 26.11.02.04B

LEGAL OWNER & ADDRESS

American Sugar Refining
One North Clematis Street, Suite 200
West Palm Beach, FL 33401
Attn: Mr. Timothy J. Noud, Plant Manager

SITE

American Sugar Refining
1100 Key Highway East
Baltimore, MD 21230
Premises # 510-0314
AI # 60

SOURCE DESCRIPTION

This permit authorizes the for modification of the existing filler system powdered sugar packaging line [including S6-71: 1-4 10X Filler System] (**MDE Reg No. 8-0225**) which vents to the Wheelabrator Dry Filler (**MDE Reg. No. 8-0296**) with the addition of two (2) new Hayssen VFFS bagger/filler systems to replace the four (4) Bosch VFFS bagger/filler systems (which reached end-of-life). Also keep Bins 3 and 4 to feed the new Hayssen VFFS bagger/filler systems.

This source is subject to the conditions described on the attached pages.

Page 1 of 9

See email for approval.

Program Manager

See email for approval.

Director, Air and Radiation Administration

AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0225 & 8-0296

INDEX

Part A – General Provisions
Part B – Applicable Regulations
Part C – Construction Conditions
Part D – Operating Conditions
Part E – Notifications, Testing and Monitoring
Part F – Record Keeping and Reporting

Part A – General Provisions

- (1) The following Air and Radiation Administration (ARA) permit-to-construct applications and supplemental information are incorporated into this permit by reference:
 - (a) Application for Processing or Manufacturing Equipment (Form 5) received March 12, 2021 for modification of the existing filler system powdered sugar packaging line [including S6-71: 1-4 10X Filler System] (**MDE Reg No. 8-0225**) which vents to the Wheelabrator Dry Filler (**MDE Reg. No. 8-0296**) with the addition of two (2) new Hayssen VFFS bagger/filler systems to replace the four (4) Bosch VFFS bagger/filler systems (which reached end-of-life). Also keep Bins 3 and 4 to feed the new Hayssen VFFS bagger/filler systems.
 - (b) Emission Point Data (Form 5EP) received March 12, 2021.
 - (c) Application for Permit to Construct Gas Cleaning or Emission Control Equipment (Form number 6) received March 12, 2021 for two (2) Hayssen VFFS baggers to replace the four (4) existing Bosch VFFs baggers.
 - (d) Supplemental Information [Emission calculations, project description, project schematic and flow diagram] received March 12, 2021.

If there are any conflicts between representations in this permit and representations in the applications, the representations in the permit shall govern. Estimates of dimensions, volumes, emissions rates, operating rates, feed rates and hours of operation included in the applications do not constitute enforceable numeric limits beyond the extent necessary for compliance with applicable requirements.

**AMERICAN SUGAR REFINING
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PERMIT No. 510-0314-8-0225 & 8-0296**

- (2) Upon presentation of credentials, representatives of the Maryland Department of the Environment (“MDE” or the “Department”) and the Baltimore City Health Department shall at any reasonable time be granted, without delay and without prior notification, access to the Permittee’s property and permitted to:
 - (a) inspect any construction authorized by this permit;
 - (b) sample, as necessary to determine compliance with requirements of this permit, any materials stored or processed on-site, any waste materials, and any discharge into the environment;
 - (c) inspect any monitoring equipment required by this permit;
 - (d) review and copy any records, including all documents required to be maintained by this permit, relevant to a determination of compliance with requirements of this permit; and
 - (e) obtain any photographic documentation or evidence necessary to determine compliance with the requirements of this permit.
- (3) The Permittee shall notify the Department prior to increasing quantities and/or changing the types of any materials referenced in the application or limited by this permit. If the Department determines that such increases or changes constitute a modification, the Permittee shall obtain a permit-to-construct prior to implementing the modification.
- (4) Nothing in this permit authorizes the violation of any rule or regulation or the creation of a nuisance or air pollution.
- (5) If any provision of this permit is declared by proper authority to be invalid, the remaining provisions of the permit shall remain in effect.
- (6) The addition of the two (2) Hayssen VFFS baggers qualifies as an “Off Permit” change to the facility’s Part 70 Operating Permit. The Department recognizes the permit to construct application as written notification of the proposed change and should be included in the application for the next renewal of the Part 70 permit.

Part B – Applicable Regulations

- (1) This source is subject to all applicable federal air pollution control requirements.

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0225 & 8-0296**

- (2) This source is subject to all applicable federally enforceable State air pollution control requirements including, but not limited to, the following regulations:
- (a) COMAR 26.11.01.05–1, General Requirements.
- (1) “By April 1 of each year, beginning with April 1, 1993, a person subject to this regulation shall submit to the Department an emissions statement for the previous calendar year that meets the requirements of this regulation.”
- (2) “A person submitting an emissions statement shall certify that the information in the emissions statement is accurate to the person's best knowledge. The certifying individual shall be:
- (a) Familiar with each installation and source for which the statement is submitted; and
- (b) Responsible for the accuracy of the statement.”
- (3) “If actual emissions from a source or premises for any year after calendar year 1992 equal or exceed the applicable emission levels prescribed in §A(1) or (2) of this regulation, an emissions statement is required for that year and each following year unless the source demonstrates, to the satisfaction of the Department, that emissions have been permanently reduced and the source no longer has the potential to emit emissions that exceed the applicable levels.”
- (b) COMAR 26.11.01.07C, Report of Excess Emissions.
- (1) “In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone.”
- (2) “Telephone reports of excess emissions shall include the following information:
- (a) The identity of the installation and the person reporting;
- (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides);
- (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and
- (d) The actual or probable cause of the excess emissions.”
- (c) COMAR 26.11.02.04B, Permits to Construct and Approvals. ‘A permit to construct or an approval expires if, as determined by the Department:
- (1) Substantial construction or modification is not commenced within 18 months after the date of issuance of the permit or approval, unless the Department specifies a longer period in the permit or approval;

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- (2) Construction or modification is substantially discontinued for a period of 18 months after the construction or modification has commenced; or
 - (3) The source for which the permit or approval was issued is not completed within a reasonable period after the date of issuance of the permit or approval.”
- (d) COMAR 26.11.02.09A, Sources Subject to Permits to Construct and Approvals. “A person may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits to construct and approvals: (6) All sources, including installations and air pollution control equipment, except as listed in Regulation .10 of this chapter—permit to construct required.”
- (e) COMAR 26.11.02.19C, Information Required to be Maintained by a Source.
- (1) “Beginning January 1, 1994, the owner or operator of a source for which a permit to operate is required shall maintain records necessary to support the emission certification, including the following information:
 - (a) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;
 - (b) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;
 - (c) Amounts, types, and analyses of all fuels used;
 - (d) Emission data from continuous emission monitors that are required by this subtitle or EPA regulations, including monitor calibration and malfunction information;
 - (e) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment, including significant maintenance performed, malfunctions and downtime, and episodes of reduced efficiency of this equipment;
 - (f) Limitations on source operation or any work practice standards that significantly affect emissions; and
 - (g) Other relevant information as required by the Department.”
 - (2) The logs and other records of information required by §C(1) of this regulation shall be retained for a period of 5 years and made available to the Department upon request.”

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PERMIT-TO-CONSTRUCT CONDITIONS
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- (3) "If the owner or operator of a source for which a permit to operate is required fails to maintain or provide the data required by this section, which the Department requests in order to verify the emissions during the previous calendar year, the annual emission-based fee for that source shall be based on the estimated allowable emissions, as defined in COMAR 26.11.01.01B(4), of that source, as determined by the Department."
- (f) COMAR 26.11.02.19D(1), Emission Certification. "Beginning January 1, 1994, the responsible official designated by the owner or operator of a source for which a permit to operate is required shall certify, as provided at Regulation .02F of this chapter, the actual emissions of regulated air pollutants from all installations at the plant or facility."
- (g) COMAR 26.11.03.14A – Revisions of Part 70 permits – General Requirements. "The Permittee shall submit an application to the Department to revise a Part 70 permit when required under Regulations. 15-.17 of this chapter."
- (h) COMAR 26.11.06.02C(2), Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."
- (i) COMAR 26.11.06.02A(2), General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:
- (a) The visible emissions are not greater than 40 percent opacity; and
 - (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period."
- (j) COMAR 26.11.06.03B(2)(a), Particulate Matter from Confined Sources. "A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."
- (k) COMAR 26.11.06.03D, Particulate Matter from Materials Handling and Construction. "A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne."

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PERMIT No. 510-0314-8-0225 & 8-0296**

- (3) This source is subject to all applicable State-only enforceable air pollution control requirements including, but not limited to, the following regulations:
- (a) COMAR 26.11.06.08, Nuisance. “An installation or premises may not be operated or maintained in such a manner that a nuisance or air pollution is created. Nothing in this regulation relating to the control of emissions may in any manner be construed as authorizing or permitting the creation of, or maintenance of, nuisance or air pollution.”
 - (b) COMAR 26.11.06.09, Odors. “A person may not cause or permit the discharge into the atmosphere of gases, vapors, or odors beyond the property line in such a manner that a nuisance or air pollution is created.”

Part C – Construction & Operating Conditions

- (1) Except as otherwise provided in this part, the two (2) Hayssen VFFS baggers that replaces the four (4) existing Bosch VFFS baggers (which have reached end-of-life) shall be constructed in accordance with specifications included in the incorporated applications.
- (2) Except as otherwise provided in this part, the two (2) Hayssen VFFS baggers that replaces the four (4) existing Bosch VFFS baggers (which have reached end-of-life) shall be operated in accordance with specifications included in the application and any operating procedures recommended by equipment vendors unless the Permittee obtains from the Department written authorization for alternative operating procedures.
- (3) The Permittee shall develop and maintain a preventative maintenance plan for each control device that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. **[Reference: COMAR 26.11.03.06C]**

Part D – Monitoring Requirements

- (1) The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation.

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0225 & 8-0296**

- (2) If emissions in the exhaust gases are visible, the Permittee shall perform the following:
- (a) Inspect all process and/or control equipment that may affect visible emissions;
 - (b) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated.
 - (c) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
 - (d) If visible emissions have not been eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.
[Reference: COMAR 26.11.03.06C]

Part E – Record Keeping and Reporting

- (1) The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, records of the following information:
- (a) A record of the results of the monthly inspections and the log of inspection and maintenance.
 - (b) A log with records of the dates and description of maintenance activities performed.
- (2) The Permittee shall submit to the Department by April 1 of each year a certification of emissions for the previous calendar year. The certifications shall be prepared in accordance with requirements, as applicable, adopted under COMAR 26.11.01.05 – 1 and COMAR 26.11.02.19D.
- (a) Certifications of emissions shall be submitted on forms obtained from the Department.
 - (b) A certification of emissions shall include mass emissions rates for each regulated pollutant, and the total mass emissions rate for all regulated pollutants for each of the facility's registered sources of emissions.

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-8-0225 & 8-0296**

- (c) The person responsible for a certification of emissions shall certify the submittal to the Department in the following manner:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

- (3) The Permittee shall report, in accordance with requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Administration.

**ATTACHMENT G PERMIT TO CONSTRUCT FOR CONVEYANCES
AT OLD RAW SUGAR SHED**



Maryland
Department of
the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor
Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

Ms. Coricka V. White
Plant Manager
American Sugar Refining, Inc.
One North Clematis Street, Suite 200
West Palm Beach, FL 33401

AUG - 5 2021

Dear Ms. White:

Enclosed please find your Permit to Construct for the addition of conveyance equipment for the old raw sugar shed (transfer from the old raw sugar shed to storage barge and storage barge to the storage shed) [**MDE Reg No. 510-0314-6-3091**] to be located at 1100 Key Highway East, Baltimore, MD. The permit contains both general conditions, which apply to all air quality permit holders in Maryland, and specific conditions, which apply to the addition of conveyance equipment for the old raw sugar shed that you proposed to installed.

The addition of the conveyance equipment for the old raw sugar shed qualifies as an "Off-Permit" change to the facility's Title V - Part 70 Operating Permit. The Department recognizes the permit to construct application as written notification of the proposed change. Please include the addition of the conveyance equipment for the old raw sugar shed in the application for the next renewal of the Title V - Part 70 Operating Permit.

If you have any questions regarding this permit, please contact Marcellina Gurley of my staff at marcie.gurley@maryland.gov or (410) 537-3230.

Sincerely,

A handwritten signature in black ink, appearing to read "Suna Yi Sariscak".

Suna Yi Sariscak, Manager
Air Quality Permits Program
Air & Radiation Administration

SYS/zc

Enclosure

State of



Maryland

Larry Hogan
GovernorBen Grumbles
Secretary**DEPARTMENT OF THE ENVIRONMENT**Air and Radiation Administration
1800 Washington Boulevard, Suite 720
Baltimore, MD 21230☒ Construction Permit☐ Operating Permit

PERMIT NO. 510-0314-6-3091

DATE ISSUED

AUG - 5 2021

PERMIT FEE \$500.00 (PAID)

EXPIRATION DATE

In accordance with
COMAR 26.11.02.04B**LEGAL OWNER & ADDRESS**American Sugar Refining
One North Clematis Street, Suite 200
West Palm Beach, FL 33401
Attn: Ms. Coricka V. White, Plant Manager**SITE**American Sugar Refining
1100 Key Highway, East
Baltimore, MD 21230
Premise # 510-0314
AI # 60**SOURCE DESCRIPTION**

This permit authorizes the installation of raw sugar conveyance equipment system within the Old Raw Sugar shed (transfer from the old raw sugar shed to storage barge and storage barge to the storage shed)

This source is subject to the conditions described on the attached pages.

Page 1 of 9

Program Manager
Director, Air and Radiation Administration

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-6-3091**

INDEX

- Part A – General Provisions
 - Part B – Applicable Regulations
 - Part C – Construction & Operating Conditions
 - Part D – Monitoring Requirements
 - Part E – Record Keeping and Reporting
-

Part A – General Provisions

- (1) The following Air and Radiation Administration (ARA) permit-to-construct applications and supplemental information are incorporated into this permit by reference:
 - (a) Application for Processing or Manufacturing Equipment (Form 5) received June 22, 2021, for the addition of conveyance equipment for the old raw sugar shed (transfer from the old raw sugar shed to storage barge and storage barge to the storage shed).
 - (b) Emission Point Data (Form 5EP) received June 22, 2021.
 - (c) Supplemental Information [Emission calculations, project description, project schematic, site plan and Raw Cane Sugar Safety Data Sheet] received June 22, 2021.

If there are any conflicts between representations in this permit and representations in the applications, the representations in the permit shall govern. Estimates of dimensions, volumes, emissions rates, operating rates, feed rates and hours of operation included in the applications do not constitute enforceable numeric limits beyond the extent necessary for compliance with applicable requirements.

- (2) Upon presentation of credentials, representatives of the Maryland Department of the Environment ("MDE" or the "Department") and the Baltimore City Health Department shall at any reasonable time be granted, without delay and without prior notification, access to the Permittee's property and permitted to:
 - (a) inspect any construction authorized by this permit;
 - (b) sample, as necessary to determine compliance with requirements of this permit, any materials stored or processed on-site, any waste materials, and any discharge into the environment;
 - (c) inspect any monitoring equipment required by this permit;

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-6-3091**

- (d) review and copy any records, including all documents required to be maintained by this permit, relevant to a determination of compliance with requirements of this permit; and
 - (e) obtain any photographic documentation or evidence necessary to determine compliance with the requirements of this permit.
- (3) The Permittee shall notify the Department prior to increasing quantities and/or changing the types of any materials referenced in the application or limited by this permit. If the Department determines that such increases or changes constitute a modification, the Permittee shall obtain a permit-to-construct prior to implementing the modification.
 - (4) Nothing in this permit authorizes the violation of any rule or regulation or the creation of a nuisance or air pollution.
 - (5) If any provision of this permit is declared by proper authority to be invalid, the remaining provisions of the permit shall remain in effect.
 - (6) The addition of the conveyance equipment for the old raw sugar shed (transfer from the old raw sugar shed to storage barge and storage barge to the storage shed) qualifies as an "Off Permit" change to the facility's Part 70 Operating Permit. The Department recognizes the permit to construct application as written notification of the proposed change and should be included in the application for the next renewal of the Part 70 permit.

Part B – Applicable Regulations

- (1) This source is subject to all applicable federal air pollution control requirements.
- (2) This source is subject to all applicable federally enforceable State air pollution control requirements including, but not limited to, the following regulations:
 - (a) COMAR 26.11.01.05–1, General Requirements.
 - (1) "By April 1 of each year, beginning with April 1, 1993, a person subject to this regulation shall submit to the Department an emissions statement for the previous calendar year that meets the requirements of this regulation."
 - (2) "A person submitting an emissions statement shall certify that the information in the emissions statement is accurate to the person's best knowledge. The certifying individual shall be:
 - (a) Familiar with each installation and source for which the statement is submitted; and

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-6-3091**

- (b) Responsible for the accuracy of the statement."
- (3) "If actual emissions from a source or premises for any year after calendar year 1992 equal or exceed the applicable emission levels prescribed in §A(1) or (2) of this regulation, an emissions statement is required for that year and each following year unless the source demonstrates, to the satisfaction of the Department, that emissions have been permanently reduced and the source no longer has the potential to emit emissions that exceed the applicable levels."
- (b) COMAR 26.11.01.07C, Report of Excess Emissions.
 - (1) "In the case of any occurrence of excess emissions, expected to last or actually lasting for 1 hour or more, from any installation required by COMAR 26.11.02.13 to obtain a State permit to operate, the owner or operator shall report the onset and shall report the termination of the occurrence to the Department by telephone."
 - (2) "Telephone reports of excess emissions shall include the following information:
 - (a) The identity of the installation and the person reporting;
 - (b) The nature or characteristics of the emissions (for example, hydrocarbons, fluorides);
 - (c) The time of occurrence of the onset of the excess emissions and the actual or expected duration of the occurrence; and
 - (d) The actual or probable cause of the excess emissions."
- (c) COMAR 26.11.02.04B, Permits to Construct and Approvals. "A permit to construct or an approval expires if, as determined by the Department:
 - (1) Substantial construction or modification is not commenced within 18 months after the date of issuance of the permit or approval, unless the Department specifies a longer period in the permit or approval;
 - (2) Construction or modification is substantially discontinued for a period of 18 months after the construction or modification has commenced; or
 - (3) The source for which the permit or approval was issued is not completed within a reasonable period after the date of issuance of the permit or approval."
- (d) COMAR 26.11.02.09A, Sources Subject to Permits to Construct and Approvals. "A person may not construct or modify or cause to be constructed or modified any of the following sources without first obtaining, and having in current effect, the specified permits to construct and approvals: (6) All sources, including installations and air pollution control equipment, except as listed in Regulation .10 of this chapter—permit to construct required."

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-6-3091**

- (e) COMAR 26.11.02.19C, Information Required to be Maintained by a Source.
- (1) "Beginning January 1, 1994, the owner or operator of a source for which a permit to operate is required shall maintain records necessary to support the emission certification, including the following information:
- (a) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;
 - (b) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;
 - (c) Amounts, types, and analyses of all fuels used;
 - (d) Emission data from continuous emission monitors that are required by this subtitle or EPA regulations, including monitor calibration and malfunction information;
 - (e) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment, including significant maintenance performed, malfunctions and downtime, and episodes of reduced efficiency of this equipment;
 - (f) Limitations on source operation or any work practice standards that significantly affect emissions; and
 - (g) Other relevant information as required by the Department."
- (2) The logs and other records of information required by §C(1) of this regulation shall be retained for a period of 5 years and made available to the Department upon request."
- (3) "If the owner or operator of a source for which a permit to operate is required fails to maintain or provide the data required by this section, which the Department requests in order to verify the emissions during the previous calendar year, the annual emission-based fee for that source shall be based on the estimated allowable emissions, as defined in COMAR 26.11.01.01B(4), of that source, as determined by the Department."
- (f) COMAR 26.11.02.19D(1), Emission Certification.
"Beginning January 1, 1994, the responsible official designated by the owner or operator of a source for which a permit to operate is required shall certify, as provided at Regulation .02F of this chapter, the actual emissions of regulated air pollutants from all installations at the plant or facility."
- (g) COMAR 26.11.03.14A – Revisions of Part 70 permits – General Requirements. "The Permittee shall submit an application to the Department to revise a Part 70 permit when required under Regulations. 15-.17 of this chapter."

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-6-3091**

- (h) COMAR 26.11.06.02C(2) - Visible Emission Standards. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."
COMAR 26.11.06.02 A(2), General Exceptions. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:
(a) The visible emissions are not greater than 40 percent opacity; and
(b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period."
- (i) COMAR 26.11.06.03C. - Particulate Matter from Unconfined Sources. "(1) A person may not cause or permit emissions from an unconfined source without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, when appropriate as determined by the Department, the installation and use of hoods, fans, and dust collectors to enclose, capture, and vent emissions. In making this determination, the Department shall consider technological feasibility, practicality, economic impact, and the environmental consequences of the decision.
(2) Exceptions. The following are exempt from the provisions of §C(1):
(a) Iron and steel production installations which are subject to COMAR 26.11.10.04B and C;
(b) Grain drying and grain handling installations;
(c) Batch-type hot-dip galvanizing installations which are subject to COMAR 26.11.12."
- (j) COMAR 26.11.06.03D, Particulate Matter from Materials Handling and Construction. "A person may not cause or permit any material to be handled, transported, or stored, or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. These reasonable precautions shall include, but not be limited to, the following when appropriate as determined by the control officer:
(1) Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
(2) Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can create airborne dusts.
(3) Installation and use of hoods, fans, and dust collectors to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting of buildings or other similar operations."

**AMERICAN SUGAR REFINING
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PERMIT No. 510-0314-6-3091**

- (4) Covering, at all times when in motion, open-bodied vehicles transporting materials likely to create air pollution. Alternate means may be employed to achieve the same results as would covering the vehicles.
 - (5) The paving of roadways and their maintenance in clean condition.
 - (6) The prompt removal from paved streets of earth or other material which has been transported there by trucks or earth moving equipment or erosion by water."
- (3) This source is subject to all applicable State-only enforceable air pollution control requirements including, but not limited to, the following regulations:
- (a) COMAR 26.11.06.08, Nuisance. "An installation or premises may not be operated or maintained in such a manner that a nuisance or air pollution is created. Nothing in this regulation relating to the control of emissions may in any manner be construed as authorizing or permitting the creation of, or maintenance of, nuisance or air pollution."
 - (b) COMAR 26.11.06.09, Odors. "A person may not cause or permit the discharge into the atmosphere of gases, vapors, or odors beyond the property line in such a manner that a nuisance or air pollution is created."

Part C – Construction & Operating Conditions

- (1) Except as otherwise provided in this part, the addition of conveyance equipment for the old raw sugar shed (transfer from the old raw sugar shed to storage barge and storage barge to the storage shed) shall be constructed in accordance with specifications included in the incorporated applications.
- (2) Except as otherwise provided in this part, the addition of conveyance equipment for the old raw sugar shed (transfer from the old raw sugar shed to storage barge and storage barge to the storage shed) shall be operated in accordance with specifications included in the application and any operating procedures recommended by equipment vendors unless the Permittee obtains from the Department written authorization for alternative operating procedures.
- (3) The Permittee shall develop and maintain a preventative maintenance plan for conveyance equipment that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frame established in the plan. **[Reference: COMAR 26.11.03.06]**

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-6-3091**

Part D – Monitoring Requirements

- (1) The Permittee shall perform a walk-through inspection once a month of the facility to look for sources of visible emissions. The Permittee shall visually inspect the exhaust gases from each stack that exhausts outside a building and look at openings in buildings through which visible emissions can escape to the outside. The Permittee shall record the results of each observation. If visible emissions in the exhaust gases are visible, the Permittee shall perform the following:
 - (1) Inspect all process and/or control equipment that may affect visible emissions;
 - (2) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated;
 - (3) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and
 - (4) If visible emissions have not eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions.**[Reference: COMAR 26.11.03.06]**
- (2) The Permittee shall maintain records of the results of the monthly inspections and the log of inspection and maintenance for at least five (5) years and make them available to the Department upon request. **[Reference: COMAR 26.11.03.06]**

Part E – Record Keeping and Reporting

- (1) The Permittee shall maintain for at least five (5) years, and shall make available to the Department upon request, records of the following information:
 - (a) A record of the results of the monthly inspections and the log of inspection and maintenance.
 - (b) A log with records of the dates and description of maintenance activities performed.
- (2) The Permittee shall submit to the Department by April 1 of each year a certification of emissions for the previous calendar year. The certifications shall be prepared in accordance with requirements, as applicable, adopted under COMAR 26.11.01.05 – 1 and COMAR 26.11.02.19D.
 - (a) Certifications of emissions shall be submitted on forms obtained from the Department.

**AMERICAN SUGAR REFINING
PERMIT-TO-CONSTRUCT CONDITIONS
PERMIT No. 510-0314-6-3091**

- (b) A certification of emissions shall include mass emissions rates for each regulated pollutant, and the total mass emissions rate for all regulated pollutants for each of the facility's registered sources of emissions.
- (c) The person responsible for a certification of emissions shall certify the submittal to the Department in the following manner:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”
- (3) The Permittee shall report, in accordance with requirements under COMAR 26.11.01.07, occurrences of excess emissions to the Compliance Program of the Air and Radiation Administration.

ATTACHMENT H

**MDE ADMINISTRATIVE COMPLETENESS
LETTERS**



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

April 23, 2020

Mr. Timothy J. Noud
American Sugar Refining, Inc.
1100 Key Highway East
Baltimore, MD 21230

Dear Mr. Noud:

This letter is to advise you that the Department has completed a preliminary review of your application for an administrative amendment (250 kW emergency generator replacement) to the Title V (Part 70) operating permit for the American Sugar Refining, Inc. located at 1100 Key Highway East, Baltimore, Maryland, and has found that the application includes all information necessary for initiation of a more comprehensive technical review. Therefore, the Department considers the application to be administratively complete, and hereby grants American Sugar Refining, Inc. an application shield.

As the review process progresses, you will be contacted if any of the information in the application needs clarification or if additional information is required. You will need to provide such clarification or additional information in a timely manner in order for the application to continue to be deemed administratively complete and thereby preserving the application shield.

If you have any questions, please contact Marcellina Gurley of my staff at (410) 537-3230.

Sincerely,

Suna Yi Sariscak, Manager
Air Quality Permits Program
Air and Radiation Administration

SYS/jm



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

Mr. Timothy J. Noud, Plant Manager
American Sugar Refining, Inc.
1100 Key Highway East
Baltimore, MD 21230

Dear Mr. Noud:

This letter is to advise you that the Department has completed a preliminary review of your application for an administrative amendment (removal of Units: R29-2: Raw Sugar Shed. RSB-6 & RSB-9: Conveyors, & RSS-3: Shuttle) to the Title V (Part 70) operating permit for the American Sugar Refining, Inc. located at 1100 Key Highway East, Baltimore, Maryland, and has found that the application includes all information necessary for initiation of a more comprehensive technical review. Therefore, the Department considers the application to be administratively complete, and hereby grants American Sugar Refining, Inc. an application shield.

As the review process progresses, you will be contacted if any of the information in the application needs clarification or if additional information is required. You will need to provide such clarification or additional information in a timely manner in order for the application to continue to be deemed administratively complete and thereby preserving the application shield.

If you have any questions, please contact Marcellina Gurley of my staff at marcie.gurley@maryland.gov or (410) 537-3230.

Sincerely,
/S/
Suna Yi Sariscak, Manager
Air Quality Permits Program
Air and Radiation Administration

SYS/jm

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