AIR AND RADIATION ADMINISTRATION
DRAFT PART 70 OPERATING PERMIT

DOCKET # 24-015-0079

COMPANY: W.L. Gore & associates, Inc.

LOCATION: W.L. Gore Cherry Hill Plant
2401 Singerly Road
Elkton, MD 21921

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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 W.L. Gore & Associates, Inc., Cherry Hill Plant located in Elkton, MD. The facility includes forming /compounding/extruding operations, calendaring operations, boilers, emergency generators, batch ovens and an oxidizer control system. The applicant is represented by:

Ms. Jenn Johnson, Environmental Specialist
W.L. Gore & Associates, Inc.- Cherry Hill Plant
2401 Singerly Road
Elkton, MD 21921

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.

DRAFT PERMIT

Wes Moore Serena McIlwain

Air and Radiation Administration

1800 Washington Boulevard, Suite 720
Baltimore, MD 21230

☐ Construction Permit ☒ Part 70 Operating Permit

PERMIT NO.:
24-015-0079

DATE ISSUED:

PERMIT FEE:
To Be Paid in Accordance with COMAR 26.11.02.19B

EXPIRATION DATE:
June 30, 2028

LEGAL OWNER & ADDRESS
W. L. Gore & Associates, Inc.
1 Lovett Drive,
Health & Well-Being EH&S,
Elkton, MD 21921

Attention: Ms. Jenn Johnson

SITE
Cherry Hill Plant
2401 Singerly Road
Elkton, MD 21921

Cecil County
AI # 128

SOURCE DESCRIPTION

One (1) Fluoropolymer Material Manufacturing Facility.

This source is subject to the conditions described on the attached pages.

Program Manager

Director, Air and Radiation Administration

W. L. GORE & ASSOCIATES, INC.
CHERRY HILL PLANT
2401 SINGERLY ROAD, ELKTON, MD 21921
DRAFT PART 70 OPERATING PERMIT NO. 24-015-0079

SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

W. L. Gore & Associates, Inc. is a worldwide manufacturing corporation with headquarters in Newark, Delaware. W. L. Gore & Associates, Inc. – Cherry Hill facility is located at 2401 Singerly Road in Cecil County, Maryland. The Cherry Hill facility operations utilize fluoropolymer material (FPM) forming and stretching equipment. The primary SIC for this facility is 3087.

2. FACILITY INVENTORY LIST

Emissions Unit Number	MDE – ARA Registration Number	CH Number	Description	Date of Installation
EU 1-1 Particulate Matter Emitting Units	6-0104	0	Control: Dust Collector	5/1/2001
		63203	Forming: Mixing and Compounding	7/1/2002
		62347	Forming: Mixing and Compounding	5/1/2001
	6-0328	20017616	Forming: High Shear Mixers	8/1/2013
	6-0376	0	Forming: Mixing and Compounding	2020
	6-0385	Wharf Rat 2	Forming: Calendaring	2/1/2021
EU 2-1 Boilers	4-0223	0	Boiler: Burnham natural gas fired rated at 9.5-MMBtu/hr. heat input	12/16/2006; modified 2014
	4-0224	0	Boiler: Burnham natural gas fired rated at 9.5-MMBtu/hr. heat input.	12/16/2006; modified 2014
	5-0149	0	Boiler: Burnham natural gas fired rated at 10.4-	1/24/2018

			MMBtu/hr. heat input.	
EU 2-2 Emergency Generator	9-0169	0	EGEN: Emergency generator rated at 800-kW	12/2006
EU 3-1 FPM Shaping and Forming Equipment (General Exhaust)	6-0317	20000806	Forming: Extruder	2012
	6-0318	976	Forming: Extruder	Pre-1990
	6-0324	2052	Forming: Extruder	Pre-1990
	6-0326	1991534	Forming: Extruder	2007
	6-0327	2371	Forming: Extruder	Pre-1990
	6-0348	20031600	Forming: Calendaring	Oct 2015
	6-0351	2262	Forming: Extruder	Pre-1990
	6-0352	13831	Forming: Extruder	2013
	6-0353	2013	Forming: Extruder	Pre-1990
	0-0361	20038276	Forming: Extruder	2017
	7-0045	74837	Forming: Extruder	Pre-1990
	7-0045	20006547	Forming: Extruder	2011
	6-0367	20032269	Forming: Extruder	2018
	6-0372	Hulk 4	Forming: Calendaring Line	2019
	6-0384	20048553	Forming: Calendaring Line	2/2021
EU 3-2 Filled FPM Products Area vented through the oxidizer control	7-0045	1314	Drying: Dryer	Pre-7/1/88
	6-0260	1316	Drying: Dryer	Pre-1990
	7-0045	1381	Drying: Dryer	Pre-7/1/88
	6-0102	2203	Drying: Dryer	1/1/1995
	6-0131	2204	Drying: Dryer	12/1/1996
	6-0126	2383	Drying: Dryer	10/1/1996
	6-0276	2404	Drying: Dryer	7/1/1997

system (OCS)	6-0173	2440	Drying: Batch Oven	3/1/1997
	6-0279	2615	Drying: Batch Oven	May 1999
	6-0311	60265	Drying: Dryer	March 2012
	6-0278	60648	Drying: Dryer	12/1/1999
	6-0275	74799	Drying: Dryer	Aug 2007
	6-0325	20011771	Drying: Dryer	Dec 2013
	6-0363	20038790	Drying: Dryer	4/18/2018
	6-0365	20039595	Drying: Dryer	Apr 2018
	6-0381	0	Drying: Dryer	Dec 2021
	6-0396	TD1d	Drying: Dryer	2022
	6-0404	TL2	Drying: Dryer – Electric drying machine	1/2023
	6-0407	20057411	Drying: DSL2	1/2023
	6-0363	0	Control: OCS	12/2020
	6-0173	2369	Control: OCS	6/1/1996
		60535	Control: OCS	3/1/1999
		62581	Control: OCS	1/1/2002
EU 3-3 Batch Ovens ventilated to Atmosphere	6-0041	2365	Drying: R&D Oven	June 1992
		2366	Drying: R&D Oven	Oct 2003
	6-0130	2281	Drying: Lab Ovens	Aug 1982
		2505	Drying: Lab Oven	May 1999
EU 3-4 FPM Shaping and Forming Equipment with VOC and PM emissions	6-0373	0	Forming: High Shear Mixer	2018
	6-0390	Wharf Rat 1	Forming: Calendar: FPM forming machine	10/2017
	6-0409	20057751	FPM Shaping/Forming: Mixer (Black Blood)	2023

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
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 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;

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.

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, 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:

(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

(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.

(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;

(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.

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:

(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;

(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.

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;

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 by (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.

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

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

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 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.

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:

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]

[1]. The Permittee shall submit risk management plans by the date specified in 40 CFR 68.150.

The Permittee shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.

or

[2]. 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 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)

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;

(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.

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

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.

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 82.157.

16. ACID RAIN PERMIT

Not applicable

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)**]

Table IV – 1

1.0 Emissions Unit Number(s): EU 1-1 & EU 3-4

Particulate Matter Emitting Units:

EU 1-1		
Description	**Reg, No.**	**CH No.**
Forming: Mixing and Compounding with dust collector	6-0104	63203
		62347
Forming: High Shear Mixer	6-0328	20017616
Forming: Mixing and Compounding	6-0376	0
Forming: Calendaring	6-0385	0
EU 3-4		
Forming: High Shear Mixer	6-0373	0
Forming: Calendaring	6-0390	0
FPM Shaping/Forming: Mixer (Black Blood)	6-0409	20057751

Table IV – 1	
1.1	**Applicable Standards/Limits:** A. Control of Visible Emissions **COMAR 26.11.06.02C(1)** – Visible Emission 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 greater than 20 percent opacity." COMAR 26.11.06.02A(2) – General Exception. "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 Emissions **COMAR 26.11.06.03B(1)** – Particulate Matter from Confined Sources. "A person may not cause or permit particulate matter to be discharged from any installation constructed on or after January 17, 1972, in excess of 0.05 gr/scfd (115 kg/dscm)."
1.2	**Testing Requirements:** A. Control of Visible Emissions See Monitoring Requirements B. Control of Particulate Matter Emissions See Monitoring Requirements
1.3	**Monitoring Requirements:** A. Control of Visible Emissions The Permittee shall conduct a monthly 6-minute visual observation of the baghouse exhaust. The visual observation must be conducted while the baghouse is in operation. If no visible emissions are observed in six consecutive monthly observations from the baghouse exhaust, the Permittee may decrease the frequency of visual observations from monthly to quarterly for the baghouse exhaust. If visible emissions are observed during any quarterly visual observation, the Permittee must resume the observation of the baghouse exhaust on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly visual observations. If visible emissions are observed during any observation, the Permittee must conduct an 18-minute test of opacity in accordance with Method 9. The Method 9 test

Table IV – 1	
	must begin within 24-hour of any observation of visible emissions. **[Reference: COMAR 26.11.03.06C]** B. Control of Particulate Matter Emissions The Permittee shall update and maintain the preventive maintenance plan for the baghouse that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frames established in the plan and shall maintain a log with records of the dates and a description of the maintenance that was performed. **[Reference: COMAR 26.11.03.06C].**
1.4	**Record Keeping Requirements:** 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 on site a log of the dates and results of visible emissions observations for a period of at least 5 years. **[Reference: COMAR 26.11.03.06C]** B. Control of Particulate Matter Emissions The Permittee shall maintain a copy of the preventive maintenance plan and a record of the dates of and description of maintenance activity performed. The Permittee shall maintain records of the baghouse malfunctions and the corrective actions taken to bring into proper operation. **[Reference: COMAR 26.11.03.06C].**
1.5	**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" [**Reference: COMAR 26.11.01.07**] B. Control of Particulate Matter Emissions The Permittee shall submit a copy of the preventive maintenance plan, records of maintenance activities and corrective actions taken to the Department upon request. **[Reference: COMAR 26.11.03.06C].**

"A permit shield shall cover the applicable requirements identified for the emission unit(s) listed in the table above."

Table IV – 2	
2.0	**Emissions Unit Number(s): EU 2-1: Boilers** Boilers: Two (2) Burnham natural gas fired boilers each rated at 9.5 million Btu per hour heat input and equipped with low NO_X burners. (Boilers #SB1 & #SB2) [4-0223 & 4-0224] One (1) Burnham natural gas fired boiler rated at 10.4 million Btu per hour heat input and equipped with low NO_X burners. (Boiler #SB3) [5-0149]
2.1	**Applicable Standards/Limits:** A. Control of Visible Emissions **COMAR 26.11.09.05A(1)** - Fuel Burning Equipment. "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 greater than 20 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." B. Operational Limits The three (3) Burnham boilers shall burn natural gas only. **[Reference: MDE Permit to Construct Nos. 4-0223 & 4-0224, 5-0149 Part C(3) issued January 24, 2018]** C. NSPS Boiler – SB3 only **§60.40c - Applicability and delegation of authority**. (a) Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h).
2.2	**Testing Requirements:** A. Control of Visible Emissions See Monitoring Requirements

Table IV – 2	
	B. Operational Limits See Record Keeping Requirements. C. NSPS Boilers See Record Keeping Requirements.
2.3	**Monitoring Requirements:** A. Control of Visible Emissions The Permittee shall properly operate and maintain the boilers in a manner to prevent visible emissions. [**Reference: COMAR 26.11.03.06C**] B. Operational Limits See Record Keeping Requirements. C. NSPS Boilers See Record Keeping Requirements.
2.4	**Record Keeping Requirements:** 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 an operations manual and preventive maintenance plan. The Permittee shall maintain a log of maintenance performed that relates to combustion performance. [**Reference: COMAR 26.11.03.06C].** B. Operational Limits The Permittee shall retain records of the type of fuel used and hours of operation for the boilers on site. **[Reference: MDE Permit to Construct Nos. 015-0079-4-0223 & 4-0224, 5-0149 Part D issued January 24, 2018]** C. NSPS Boiler – SB3 only The Permittee shall retain records of the amount of each fuel combusted during each calendar month. **[Reference: §60.48c(g)(2)]**
2.5	**Reporting Requirements:** A. Control of Visible Emissions

Table IV – 2	
	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" [**Reference: COMAR 26.11.01.07**] B. Operational Limits The Permittee shall submit records of the quantity and type of fuels burned with the annual emissions certification report. **[Reference: Title V, Section III, Condition 8**] C. NSPS Boilers The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period. **[Reference: §60.48c(j)]**

"A permit shield shall cover the applicable requirements identified for the emission unit(s) listed in the table above."

Table IV – 3	
3.0	**Emissions Unit Number(s): EU 2-2: Emergency Generator** Emergency Generator: One (1) Onan 1200 bhp (800 kW) diesel emergency generator. (**Reg. No. 6-0169**)
3.1	**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.

Table IV – 3	
	(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 Emissions **COMAR 26.11.09.07A(1)(c)**. 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: Distillate fuel oils, 0.3 percent."
3.2	**Testing Requirements:** A. Control of Visible Emissions See Monitoring Requirements B. Control of Sulfur Oxides Emissions. See Monitoring Requirements
3.3	**Monitoring Requirements:** A. Control of Visible Emissions The Permittee shall properly operate and maintain the emergency generator in a manner to prevent visible emissions. [**Reference: COMAR 26.11.03.06C**] B. Control of Sulfur Oxides Emissions. The Permittee shall obtain a certification from the fuel supplier that the fuel oil is in compliance with the sulfur in fuel limitation. **[Reference: COMAR 26.11.03.06C]**
3.4	**Record Keeping Requirements:** 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 an operations manual and preventive maintenance plan. The Permittee shall maintain a log of maintenance performed that relates to combustion performance. [**Reference: COMAR 26.11.03.06C].**

Table IV – 3	
	B. Control of Sulfur Oxides Emissions. The Permittee shall retain fuel supplier certifications stating that the fuel oil is in compliance with this regulation [**Reference: COMAR 26.11.09.07C].**
3.5	**Reporting Requirements:** A. Control of Visible Emissions The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, "Report of Excess Emissions and Deviations" [**Reference: COMAR 26.11.01.07**] B. Control of Sulfur Oxides Emissions. The Permittee shall report fuel supplier certifications to the Department upon request [**Reference: COMAR 26.11.09.07C]**

"A permit shield shall cover the applicable requirements identified for the emission unit(s) listed in the table above."

Table IV – 3a	
3a.0	**Emissions Unit Number(s): EU 2-2 Cont'd** Emergency Generator One (1) Onan 1200 bhp *(800 kW)* diesel emergency generator. (6-0169)
3a.1	**Applicable Standards/Limits:** **40 CFR Part 63 Subpart ZZZZ –** National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. **§63.6595 - When do I have to comply with this subpart?** (a) *Affected sources.* (1)" ….. If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, **or 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.** …..".

Table IV – 3a

§63.6603 - What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

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 to this subpart.

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in **Table 2d** to this subpart and the operating limitations in Table 1b and Table 2b to 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

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 or local law under which the risk was deemed unacceptable.

Table IV – 3a	
	§63.6605 - What are my general requirements for complying with this subpart? "(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."
3a.2	**Testing Requirements:** See Monitoring Requirements
3a.3	**Monitoring Requirements:** **§63.6625 - What are my monitoring, installation, collection, operation, and maintenance requirements?** "(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (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." "(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 emissions 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." "(h) If you operate a new, reconstructed, or **existing stationary engine**, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate

Table IV – 3a	
	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, 2a, 2c, and **2d** to this subpart apply. (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 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent 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." **§63.6640 - How do I demonstrate continuous compliance with the emission limitations and operating limitations?** (a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart. (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, Table 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

Table IV – 3a	
	operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE. "(f) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, 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 RICE in emergency situations. (2) You may operate your emergency stationary RICE for the purpose 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 paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2). (i) Emergency stationary RICE 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 RICE beyond 100 hours per calendar year. (ii) - (iii) [Reserved]. (3) *Not Applicable.* (4) Emergency stationary RICE located at area sources of HAP 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 paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be

Table IV – 3a	
	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."
3a.4	**Record Keeping Requirements:** **Note:** All records must be maintained for a period of at least 5 years. **[Reference: COMAR 26.11.03.06C(5)(g)]** **§63.6655 - What records must I keep?** "(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; (2) An existing stationary emergency RICE. (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." "(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, 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. (3) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines."
3a.5	**Reporting Requirements:** "Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable." **[Footnote 2 of Table 2d]**

"A permit shield shall cover the applicable requirements identified for the emission unit(s) listed in the table above."

Table IV – 4	
4.0	**Emissions Unit Number(s): EU 3-1, EU 3-2, EU 3-3 & EU 3-4** **EU 3-1**: FPM Shaping and Forming Equipment - General Exhaust. **EU 3-2**: Filled FPM Products Area vented through the oxidizer control system (OCS) **EU 3-3**: Batch Ovens to Atmosphere. **EU 3-4**: FPM Shaping and Forming Equipment with VOC and PM
4.1	**Applicable Standards/Limits:** Control of VOC Emissions a. **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 (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;

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	(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. “ b. **COMAR 26.11.19.16C** - Control of VOC 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

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	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 26.11.19.16D**. 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."
4.2	**Testing Requirements:** Control of VOC Emissions a. See Monitoring Requirements. b. See Monitoring Requirements.
4.3	**Monitoring Requirements:** Control of VOC Emissions a. 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**] b. 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;

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	(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**]
4.4	**Record Keeping Requirements:** Note: **All records must be maintained for a period of 5 years. [Reference: COMAR 26.11.03.06C(5)(g)].** Control of VOC Emissions a. The Permittee shall maintain: (1) Written descriptions of all "good operating practices" designed to minimize emissions of VOC from facility-wide operations. **[Reference: COMAR 26.11.19.02I]** (2) 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]** b. The Permittee shall: (1) 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

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	(2) 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)]**
4.5	**Reporting Requirements:** Control of VOC Emissions a. Good operating practices information as required by COMAR 26.11.19.02I shall be made available to the Department upon request. [**Reference: COMAR 26.11.19.02I**] b. VOC Leak inspection logs as required by COMAR 26.11.19.16 shall be made available to the Department upon request. [**Reference: COMAR 26.11.19.16**]

"A permit shield shall cover the applicable requirements identified for the emission unit(s) listed in the table above."

Table IV – 5	
5.0	**Emissions Unit Number(s): EU 3-2** **EU 3-2**: Filled FPM Products Area vented through the oxidizer control system (OCS).
5.1	**Applicable Standards/Limits:** A. Control of Visible Emissions **COMAR 26.11.06.02C(1)** – Visible Emission 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 greater than 20 percent opacity." COMAR 26.11.06.02A(2) – General Exception. "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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	B. Control of VOC Emissions **COMAR 26.11.19.30 -** Control of Volatile Organic Compounds from Chemical Production and Fluoropolymer Material Installations. "C. Applicability. (3) Section E of this regulation applies to a person who owns or operates an FPM process installation or FPM coating installation that, on any day, has total actual uncontrolled VOC emissions of 20 pounds or more". **COMAR 26.11.19.30E** – General Requirements for FPM Process Installations "(1) A person who owns or operates an FPM process installation that has actual uncontrolled VOC emissions of 50 pounds or more per day shall vent the emissions into a thermal oxidizer system or other control method approved by the Department to destroy or reduce VOC emissions by 85 percent or more, overall."
5.2	**Testing Requirements:** A. Control of Visible Emissions See Monitoring Requirements B. Control of VOC Emissions **COMAR 26.11.19.30F**. Demonstration of Compliance. "Compliance with this regulation shall be demonstrated using the applicable VOC test methods specified in COMAR 26.11.01.04C or other test method approved by the Department." The Permittee shall conduct performance testing of the primary oxidizer in the control system once during the 5-year term of the permit but no later than June 30, 2027. [**Reference: COMAR 26.11.03.06C].**
5.3	**Monitoring Requirements:** A. Control of Visible Emissions The Permittee shall visually inspect the exhaust of the oxidizer control system at least monthly for a 6-minute period when the process lines are in operation and shall record the result of each observation. If no visible emissions are observed in six consecutive monthly observations, the frequency of the visual observation may decrease from monthly to quarterly. If emissions are visible greater than 20 percent opacity from the oxidizer control system, the Permittee shall perform the following unless it can be shown through a Method 9 test, that the visible emissions are zero percent opacity: (a) inspect all process and/or control equipment related to emission point;

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	(b) perform all necessary repairs and/or adjustments to the oxidizers, within 48 hours, so that visible emissions in the exhaust gases are less than 20 percent opacity; and (c) document, in writing, the results of the inspections and the repairs and/or adjustments made to the oxidizers. If visible emissions greater than 20 percent opacity have not been eliminated within 48 hours, the Permittee shall perform a Method 9 observation for 18-minutes once daily when the process lines are in operation until the visible emissions have been reduced to less than 20 percent opacity. **[Reference: COMAR 26.11.03.06C]** B. Control of VOC Emissions "(2) If a thermal oxidizer is installed, the oxidizer combustion chamber shall be: (a) Operated at a minimum combustion chamber temperature of 1400°F or other temperature approved by the Department that is demonstrated to achieve compliance with this regulation; (b) Equipped with a continuous temperature monitor to record the oxidizer temperature; and (c) Equipped with an alarm system that alerts the operator when the oxidizer combustion chamber temperature is less than the approved temperature; and (d) Equipped with an interlock system that prevents operation of the FPM installation unless the approved control system is operating. (3) If a source uses an alternative control method approved by the Department, the alternative control method shall be monitored as required by the Department. (4) Equipment that is installed for the purpose of treating emissions or monitoring shall be operated, maintained, and as applicable, calibrated in accordance with the equipment vendor's specifications. (5) A person who owns or operates an FPM compounding and tape or shape-forming installation shall minimize fugitive emissions of VOC by: (a) Immediately enclosing all wet FPM during storage; and (b) Covering dipping troughs when not in operation. (6) A person who owns or operates an FPM coating installation that has actual uncontrolled VOC emissions of 20 pounds or more per day may not use a coating that has a VOC content exceeding 2.9 pounds per gallon unless the installation is equipped with a control device that meets the requirements in §E(2), (3), and (4) of this regulation." [**Reference: COMAR 26.11.19.30E(2-6)]** The Permittee shall annually replace the thermocouples that monitor the temperatures to the oxidizer control system and afterburner. [**Reference: COMAR 26.11.03.06C].**

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	See CAM Plan (40 CFR Part 64 – Compliance Assurance Monitoring) in Table 6 for additional Monitoring Requirements.
5.4	**Record Keeping Requirements:** 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 keep records of the results of visual emission observations and document any incidence of visible emissions and corrective action taken by the Permittee. **[Reference: COMAR 26.11.03.06C]** B. Control of VOC Emissions The following records shall be kept on site for a period of at least five (5) years except for the design data, which shall be retained permanently. The records shall be made available to the Department on request: (1) Permanent records**,** for the life of the equipment**,** of pertinent design data for the control device including manufacturer specifications and/or vendor guarantees for the control device and catalyst, catalyst requirements, design space velocity, operating limits, volume and configuration of catalyst required; (2) Maintenance records of types and dates of work performed on the oxidizer control system; (3) Records of the combustion chamber temperature, which shall be greater than 1400 ^{o}F or other temperature approved by the Department any time a controlled process line is in operation; and (4) Records of the results of destruction efficiency tests. (5) The Permittee shall keep records of the damper position and corresponding chamber temperature on site for at least five years. (6) The Permittee shall keep records of the annual replacement of the thermocouples on site for at least five years. **[Reference: COMAR 26.11.03.06C]**
5.5	**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”

Table IV – 5	
	B. Control of VOC Emissions The Permittee shall submit a test protocol to the Department for approval at least 30 days prior to proposed date of the test. The Permittee shall report results of the performance testing to the Department within 45 days after completion of the test. The Permittee shall make the records of the annual thermocouples replacements made available to the Department upon request. **[Reference: COMAR 26.11.03.06C]**

"A permit shield shall cover the applicable requirements identified for the emission unit(s) listed in the table above."

Table IV-6			
COMPLIANCE ASSURANCE MONITORING REQUIREMENTS – PART 64			
EU 3-2: Process Dryers and Ovens **Oxidizer Control System (OCS) consisting of the following:** **Regenerative Thermal Oxidizer #1 (SARA, CH62581);** **Regenerative Thermal Oxidizer #2 (TEC, CH2369);** **Regenerative Thermal Oxidizer #3 (WILLIE, CH60535)** **Afterburner (FRANKY, CH20047178)**			
Applicable Requirement	**VOC:**		
I. Indicator	**Combustion Zone Temperature**	**Visible Emissions**	**Stack Testing**
II. Measurement Approach	The combustion zone temperature is measured using thermocouples that are located within the combustion zone.	Periodic observations of the OCS stack can indicate if visible emissions are present.	VOC Emissions are sampled using EPA Reference Method 25A, a continuous extractive sample (40 CFR 60 Appendix A)
III. Indicator Range	An excursion occurs when the	Quarterly observations	Stack Test must show

	combustion zone temperature drops below 1400 ºF or other temperature approved by the Department, while processes are venting to the oxidizer. Audible and visual alarms will alert oxidizer operators to a temperature dropping below 1400 ºF (or other Department approved temperature), and the oxidizer will automatically remove the permissive to operate from all users prior to the temperature reaching set point. An excursion will trigger an investigation and corrective action, and if lasting longer than one hour, a reporting requirement.	are performed for a 6-minute period, while process lines are in operation and being controlled by the OCS or Afterburner.	a destruction efficiency of 85 percent or greater.
IV Performance Criteria			

A. Data Representativeness	The combustion zone temperatures are measured using thermocouples located within the combustion zone. The minimum accuracy of the thermocouple is ±2 degrees F.	A Method 9 visible emissions observation is performed.	See EPA Reference Method 25A.
B. Verification of Operational Status	N/A	N/A	See EPA Reference Method 25A
C. QA/QC Practices and Criteria	Annual replacement of the combustion zone thermocouples	N/A	See EPA Reference Method 25A.
D. Monitoring Frequency	The combustion zone temperature is monitored continuously.	Quarterly observations	The stack test is performed within 180 days of startup of unit and once during each permit cycle.
E. Data Collection Procedures	Temperatures are recorded to a digital chart recorder. The data is saved locally on a storage card and is also saved on network servers.	The 6-minute observation shall be documented and maintained for a period of at least 5 years.	See EPA Reference Method 25A, the results are reported to the permitting authority.
F. Averaging Period	6-minute average	N/A	N/A

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

(2) ✓ 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;

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

(a) No. 30 Storage of lubricating oils;

(b) No. 13 Unheated storage of VOC with an initial boiling point of 300 °F (149 °C) or greater;

(4) ✓ 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;

(5) ✓ 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;

(6) ✓ Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;

(7) ✓ Laboratory fume hoods and vents;

For the following, attach additional pages as necessary:

(8) 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):

General Category	Description	CH Nos.

Misc	Bag Dump Stations	0
Shaping	FM Line	45159
Shaping	Heat treat exhausts w/ IK dip	65128
Shaping	Tenter for wet tapes	2180
Forming	R&D ACIS	62347
Forming	R&D Jenny	62924
Drying	COAG Oven	0

(9) any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act (list and describe):

General Category	Describe this equipment	CH Nos.
Conditioning	Pellet Oven	74820
Conditioning	Pellet Oven	1551361
Conditioning	Pellet Oven	2166
Conditioning	Pellet Oven	2413
Conditioning	Pellet Oven	2443
Conditioning	Pellet Oven	2444
Conditioning	Pellet Oven	2445
Drying	Lab Ovens	963
Drying	Lab Ovens	2211
Forming	Mixing and Compounding	1931985
Misc	Chem Storage Cabinets	0
Misc	Paint Booth	5800
Misc	Slitter	1058
Misc	Welding Hood	0
Misc	Gas fired heater, 60 MBH	0
Misc	Gas fired heater, 60 MBH	0
Misc	Gas fired heater, 60 MBH	0
Shaping	Calendaring line	244
Shaping	Calendaring line	825
Shaping	Calendaring line	1367
Shaping	Calendaring line	1368
Shaping	Calendaring line	1693
Shaping	Calendaring line	2055
Shaping	Calendaring line	74770
Shaping	Calendaring line	1342
Shaping	Calendaring line	2149
Shaping	Calendaring lines	2555
Shaping	Calendaring w/dip	242
Shaping	Calendaring w/dip	75616
Shaping	Calendaring lines	126
Shaping	Heat treat exhaust	62933
Shaping	Heat treat exhaust	74794
Shaping	Heat treat exhaust	853
Shaping	Heat treat exhaust	982
Shaping	Heat treat exhaust	1425
Shaping	Heat treat exhaust	1761
Shaping	Heat treat exhaust	2344
Shaping	Heat treat exhaust	61670

General Category	Describe this equipment	CH Nos.
Shaping	Heat treat exhaust	1504863
Shaping	Heat treat exhaust	2310
Shaping	Heat treat exhaust	6044
Shaping	Heat treat exhaust	20015459
Shaping	Heat treat exhaust	20043397
Shaping	Heat treat exhaust	20043398

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 nuisance or air pollution is created."

   (c) COMAR 26.11.15.05 - Control Technology Requirements.
   "A. New or Reconstructed Installations. A person may not construct, reconstruct, operate, or cause to be constructed, reconstructed, or operated, any new installation or source that will discharge a toxic air pollutant to the atmosphere without installing and operating T-BACT."

   (d) COMAR 26.11.15.06 - Ambient Impact Requirement.
   A. Requirements for New Installations, Sources, or Premises.
   (1) Except as provided in §A(2) of this regulation, a person may not construct, modify, or operate, or cause to be constructed, modified, or operated, any new installation or source without first demonstrating to the satisfaction of the Department using procedures established in this chapter that total allowable emissions from the premises of each toxic air pollutant discharged by the new installation or source will not unreasonably endanger human health.
   (2) If a new installation or source will discharge a TAP that is not listed in COMAR 26.11.16.07 and will be part of an existing premises, then emissions of that TAP from existing sources or existing installations on the premises may be omitted from a screening analysis unless the TAP is added to COMAR 26.11.16.07.

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.

W. L. GORE & ASSOCIATES, INC.
CHERRY HILL PLANT
PERMIT NO. 24-015-0079
PART 70 OPERATING PERMIT FACT SHEET

BACKGROUND

W. L. Gore & Associates, Inc. is a worldwide manufacturing corporation with headquarters in Newark, Delaware. W. L. Gore & Associates, Inc. – Cherry Hill facility is located at 2401 Singerly Road in Cecil County, Maryland. The Cherry Hill facility operations utilize fluoropolymer material (FPM) forming and stretching equipment. The primary SIC for this facility is 3087.

The following table summarizes the actual emissions from W. L Gore & Associates, Inc. – Cherry Hill Plant based on its Annual Emission Certification Reports:

Table 1: Actual Emissions

Year	NO_x (TPY)	SO_X (TPY)	PM_{10} (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2022	8.17	0.06	0.558	18.69	18.17	0
2021	8.26	0.05	0.645	19.00	14.43	0
2020	7.76	0.05	0.573	17.67	14.64	0
2019	7.93	0.04	0.649	12.79	18.59	0
2018	8.08	0.04	0.821	6.16	16.56	0

The major source threshold for triggering Title V permitting requirements in Cecil county is 25 tons per year for VOC, 25 tons for NOx, 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 potential VOC and NO_X emissions from the facility are greater than the major source thresholds, W. L Gore & Associates, Inc. – Cherry Hill Plant is required to obtain a Title V – Part 70 Operating Permit under COMAR 26.11.03.01.

The Department on June 28, 2022, received W. L. Gore & Associates, Inc.– Cherry Hill facility's Part 70 renewal permit application. An administrative completeness review was conducted, and the application was deemed to be administratively complete. A completeness determination letter was sent to the W. L. Gore & Associates, Inc. – Cherry Hill site on July 6, 2022, granting the Cherry Hill facility an application shield.

Also, the Department received on February 26, 2024, an administrative amendment application to remove the Fluffernutter 2 equipment (015-0079-6-0387) from the permit since it was never installed due to budget constraints. An administrative completeness review was conducted, and the application was deemed administratively complete. A completeness determination letter was

sent to the W. L. Gore & Associates, Inc. – Cherry Hill site on February 26, 2024, granting the Cherry Hill facility an application shield.

CHANGES AND MODIFICATIONS TO THE PART 70 OPERATING PERMIT

The following changes and/or modifications have been incorporated into the renewal Title V – Part 70 Operating Permit for Cherry Hill Plant:

Additions to the facility

Date Issued	Registration No.	Description
January 24, 2018	015-0079-5-0149	Burnham 10.4-MMBtu/hr. boiler
August 26, 2020	015-0079-6-0384	FPM Calendaring Line: Fluffernutter 1
August 8, 2018	015-0079-6-0372	Calendaring Line: FPM forming process (Hulk 4)
February 8, 2018	015-0079-6-0367	Extruder - Elvis
September 1, 2020	015-0079-6-0385	FPM Calendaring (Wharf Rat 2) equipped with existing dust collector (6-0104)
March 4, 2019	015-0079-6-0376	Mixing and Compounding: ZR-1 Mixer-blender and material transfer/handling and emissions controlled by existing dust collector (6-0104)
February 15, 2023	015-0079-6-0409	FPM Shaping/Forming: Mixer (Black Blood)
August 26, 2020	015-0079-6-0363	Dryer – Bonham (modified 2020 to increase capacity) controlled by OCS or standalone afterburner
January 24, 2018	015-0079-6-0365	Dryer – TD1C natural gas fired dryer controlled by OCS
November 5, 2019	015-0079-6-0381	Dryer – electric FPM dryer
July 22, 2021	015-0079-6-0396	Dryer- TD1d natural gas dryer
September 13, 2022	015-0079-6-0404	Dryer- Drum-based dryer-expander sinter machine (TL2)
February 1, 2023	015-0079-6-0407	Dryer – DSL2
April 8, 2021	015-0079-6-0390	FPM Calendar (Wharf Rat 1) equipped with dust collector #3.
January 31, 2020	015-0079-6-0311	Dryer – Mini Tec (modified 2020 to fuel switch to natural gas fired from propane)

Date Issued	Registration No.	Description
January 31, 2020	015-0079-6-0278	Dryer – Rover (modified 2020 to fuel switch to natural gas fired from propane)
August 20, 2018	015-0079-6-0373	Mixing and Compounding: High Shear mixer for FPM material (AV2X Shear mixer)
April 24, 2019	015-0079-6-0102	Modification of FPM dryer TD1 (CH#2203) to switch fuel from propane to natural gas
April 24, 2019	015-0079-6-0131	Modification of FPM dryer GT7 (CH#2204) to switch fuel from propane to natural gas
April 24, 2019	015-0079-6-0173	Modification of FPM dryer TD3 (CH#2404) to switch fuel from propane to natural gas
April 24, 2019	015-0079-6-0173	Modification of the Oxidizer Control System (OCS) monitoring requirement that control emissions from the FPM dryers (Five FPM dryers – CH#2439,CH#2440, CH#2597, CH#2598, & CH#6064
	015-0079-4-0223 & -4-0224	Burnham boilers: (2) 9.45-MMBtu/hr., each. (Amended ptc issued 2017 to increase to 10.4-MMBtu/hr. was never completed).

Removal from the facility

MDE-ARA Registration No.	*Description*	*CH Number*
6-0073	Drying oven	2573
7-0045	Drum dryer	1362
6-0173	Drying batch oven	2439
6-0387	Fluffernutter 2	Plans change; was never installed.

National Emission Standard for Hazardous Air Pollutants (NESHAP) – 40 CFR Part 63

Cherry Hill facility is not a major HAP Emissions Source. Instead, it is an area HAP emission source and is subject to the following MACTs:
Subpart ZZZZ—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

COMPLIANCE ASSURANCE MONITORING

W.L. Gore & Associates, Inc.-Cherry Hill conducted a Compliance Assurance Monitoring (CAM) analysis for the facility and determined that certain Emission Units: EU3-2 is subject to the (CAM) Rule 40 CFR Subpart 64.

GREENHOUSE GAS (GHG) EMISSIONS

W.L. Gore & Associates, Inc.-Cherry Hill facility emits the following greenhouse gases (GHG) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHG originate from various processes (i.e., internal combustion engines, and boilers) contained within the facility premises applicable to Cherry Hill facility. The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements. The emission certifications report for the years 2019, 2020, 2021 and 2022 showed that Cherry Hill facility is not a major source (threshold: 100,000tpy CO_2e) for GHG (see Table 3 shown below). The Permittee shall quantify facility wide GHG emissions and report them in accordance with Section 3 of the Part 70 permit.

The following table summarizes the actual emissions from W. L. Gore & Associates, Inc. - Cherry Hill Plant based on its Annual Emission Certification Reports:

Table 2: Greenhouse Gases Emissions Summary

GHG	Conversion factor	2019 tpy CO_2e	2020 tpy CO_2e	2021 tpy CO_2e	2022 tpy CO_2e
Carbon dioxide CO_2	1	10,416.95	10,081.37	9,158.52	10,515.44
Methane CH_4	25	0.17567	0.193	0.173	0.198
Nitrous Oxide N_2O	298	0.335	0.184	0.018	0.019
Total GHG CO_{2eq}		**10,417.46**	**10,081.75**	**9,158.71**	**10,515.66**

EMISSION UNIT IDENTIFICATION

W. L. Gore & Associates, Inc. – Cherry Hill Plant has identified the following emission units as being subject to Title V permitting requirements and having applicable requirements.

Table 3: Emission Unit Identification

Emissions Unit Number	MDE – ARA Registration Number	CH Number	Description	Date of Installation
EU 1-1 Particulate Matter Emitting Units	6-0104	0	Control: Dust Collector	5/1/2001
	6-0104	63203	Forming: Mixing and Compounding	7/1/2002
	6-0104	62347	Forming: Mixing and Compounding	5/1/2001
	6-0328	20017616	Forming: two (2) High Shear Mixers	8/1/2013
	6-0376	0	Forming: Mixing and Compounding (ZR-1 Mixer-Blender controlled by the existing dust collector	2020
	6-0385	Wharf Rat 2	Forming: Calendaring controlled by dust collector	2/1/2021
EU 2-1 Boilers	4-0223	0	Boiler: Burnham natural gas fired rated at 10.4 MMBtu/hr. heat input	12/16/2006; modified 2014 & 2016
	4-0224	0	Boiler: Burnham natural gas fired rated at 10.4	12/16/2006; modified 2014 & 2016

Emissions Unit Number	MDE – ARA Registration Number	CH Number	Description	Date of Installation
			MMBtu/hr. heat input.	
	5-0149	0	Boiler: Burnham natural gas fired rated at 10.4 MMBtu/hr. heat input.	1/24/2018
EU 2-2 Emergency Generator	9-0169	0	EGEN: Emergency generator rated at 800-kW	12/2006
EU 3-1 Shaping and Forming Equipment General Exhaust	6-0317	20000806	Forming: Extruder	2012
	6-0318	976	Forming: Extruder	Pre-1990
	6-0324	2052	Forming: Extruder	Pre-1990
	6-0326	1991534	Forming: Extruder	2007
	6-0327	2371	Forming: Extruder	Pre-1990
	6-0348	20031600	Forming: Calendaring	Oct 2015
	6-0351	2262	Forming: Extruder	Pre-1990
	6-0352	13831	Forming: Extruder	2013
	6-0353	2013	Forming: Extruder	Pre-1990
	0-0361	20038276	Forming: Extruder	2017
	7-0045	74837	Forming: Extruder	Pre-1990
	7-0045	20006547	Forming: Extruder	2011
	6-0367	20032269	Forming: Extruder	2018
	6-0372	Hulk 4	Forming: Calendaring Line	2019

Emissions Unit Number	MDE – ARA Registration Number	CH Number	Description	Date of Installation
	6-0384	20048553	Forming: Calendaring Line	2/2021
EU 3-2 Drying Ovens ventilated to OCS	7-0045	1314	Drying: Dryer	Pre-7/1/88
	6-0260	1316	Drying: Dryer	Pre-1990
	7-0045	1381	Drying: Dryer	Pre-7/1/88
	6-0102	2203	Drying: Dryer: (TD1 natural gas dryer)	1/1/1995; modified 2019
	6-0131	2204	Drying: Dryer: (GT7 natural gas dryer)	12/1/1996; modified 2019
	6-0126	2383	Drying: Dryer	10/1/1996
	6-0276	2404	Drying: Dryer: (TD3 natural gas dryer)	7/1/1997; modified 2019
	6-0173	2440	Drying: Batch Oven	3/1/1997; modified 2018
	6-0279	2615	Drying: Batch Oven	May 1999
	6-0311	60265	Drying: Dryer: (Mini-Tec natural gas dryer).	March 2012; Mod 2020
	6-0278	60648	Drying: Dryer: (Rover natural gas dryer)	12/1/1999; modified 2020
	6-0275	74799	Drying: Dryer	Aug 2007
	6-0325	20011771	Drying: Dryer	Dec 2013
	6-0363	20038790	Drying: Dryer	4/18/2018
	6-0365	20039595	Drying: Dryer	Apr 2018
	6-0381	0	Drying: Dryer: Electric FPM oven	Dec 2021
	6-0396	TD1d	Drying: Dryer: natural gas fired dryer	2022
	6-0404	TL2	Drying: Dryer – Electric drying machine	1/2023
	6-0407	20057411	Drying: DSL2	1/2023

Emissions Unit Number	MDE – ARA Registration Number	CH Number	Description	Date of Installation
	6-0363	0	Control: OCS	12/2020
	6-0173	2369	Control: OCS	6/1/1996
		60535	Control: OCS	3/1/1999
		62581	Control: OCS	1/1/2002
EU 3-3 Batch Ovens ventilated to Atmosphere	6-0041	2365	Drying: R&D Oven	June 1992
	6-0041	2366	Drying: R&D Oven	Oct 2003
	6-0130	2281	Drying: Lab Ovens	Aug 1982
		2505	Drying: Lab Oven	May 1999
EU 3-4 FPM Shaping and Forming Equipment with VOC and PM emissions	6-0373	0	Forming: High Shear Mixer (AV2X)	2018
	6-0390	Wharf Rat 1	Forming: Calendar (FPM forming machine) equipped with dust collector #3.	10/2017
	6-0409	20057751	FPM Shaping/Forming: Mixer (Black Blood).	2023

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.

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 Units: EU 1-1 & EU 3-4

Particulate Matter Emitting Units:

EU 1-1: Particulate Matter Emitting Units		
Description	**Reg, No.**	**CH No.**
Forming: Mixing and Compounding with dust collector	6-0104	63203 62347
Forming: Mixing and Compounding	6-0376	0

Forming: High Shear Mixer	6-0328	20017616
Forming: Calendaring	6-0385	0
EU 3-4: FPM Shaping/Forming Equipment with VOC & PM emissions		
Forming: High Shear Mixer	6-0373	0
Forming: Calendaring	6-0390	0
FPM Shaping/Forming: Mixer (Black Blood)	6-0409	20057751

Note: These installations are minor sources of particulate matter emissions. The emission certification for 2021 reported 0.645 tons of PM_{10}. Mixer (Black Blood) is new (PTC issued Feb 15, 2023). The mixer also has VOC emissions.

Compliance Status
Full compliance inspection was conducted on June 3, 2021, virtually and June 8, 2021, in person. No visible emissions were detected during the in-person inspection.

Applicable Standards and limits:
A. Control of Visible Emissions
COMAR 26.11.06.02C(1) – Visible Emission 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 greater than 20 percent opacity."
COMAR 26.11.06.02A(2) – General Exception. "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 conduct a monthly 6-minute visual observation of the baghouse exhaust. The visual observation must be conducted while the baghouse is in operation. If no visible emissions are observed in six consecutive monthly observations from the baghouse exhaust, the Permittee may decrease the frequency of visual observations from monthly to quarterly for the baghouse exhaust. If visible emissions are observed during any quarterly visual observation, the Permittee must resume the observation of the baghouse exhaust on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly visual observations. If visible emissions are observed during any observation, the Permittee must conduct an 18-minute test of opacity in accordance with Method 9. The Method 9 test must begin within 24-hour of any observation of visible emissions. The Permittee shall maintain on site a log of the dates and results of visible emissions observations for a period of at least 5 years. **[Reference: COMAR 26.11.03.06C]**

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" [**Reference: COMAR 26.11.01.07**]

Please Note: The Permittee is now performing observations quarterly on the baghouse.

B. Control of Particulate Matter Emissions

COMAR 26.11.06.03B(1) – Particulate Matter from Confined Sources. "A person may not cause or permit particulate matter to be discharged from any installation constructed on or after January 17, 1972, in excess of 0.05 gr/scfd (115 kg/dscm)."

Compliance Demonstration

The Permittee shall update and maintain the preventive maintenance plan for the baghouse that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frames established in the plan and shall maintain a log with records of the dates and description of the maintenance that was performed. The Permittee shall maintain a copy of the preventive maintenance plan and a record of the dates of, and description of maintenance activity performed. The Permittee shall maintain records of the baghouse malfunctions and the corrective actions taken to bring into proper operation. The Permittee shall submit a copy of the preventive maintenance plan, records of maintenance activities and corrective actions taken to the Department upon request. **[Reference: COMAR 26.11.03.06C].**

Emission Units: EU 2-1: Boilers

Boilers:

Two (2) Burnham natural gas fired boilers each rated at 10.4 million Btu per hour heat input and equipped with low NO_X burners. (**Reg. Nos. 4-0223 & 4-0224**)

One (1) Burnham natural gas fired boiler rated at 10.4 million Btu per hour heat input and equipped with low NO_X burners. (**Reg. No. 5-0149**)

The Permittee applied and was issued permit to construct for the following:

- 1/24/2018 - Permit to Construct issued for the modification two (2) existing (ea. 9.45 MMBtu/hr.) boilers to increase the rating to 10.4 MMBtu/hr. and remove the No. 2 fuel oil back up capability. Also, addition of one (1) Burnham 10.4 MMBtu/hr. natural gas fired boiler equipped with low NO_X burners.

These boilers are subject to the requirements of 40 CFR 60 Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

The natural gas fired boilers are exempt from the requirements of 40 CFR Part 63, Subpart JJJJJJ pursuant to §63.11195(e).

Compliance Status
Full compliance inspection was conducted on June 3, 2021, virtually and June 8, 2021, in person. No visible emissions were detected during the in-person inspection. The Permittee has a preventive maintenance plan in place. A log of all maintenance performed on the boilers is maintained.

Applicable Standards and limits:
A. Control of Visible Emissions
COMAR 26.11.09.05A(1) - Fuel Burning Equipment. "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 greater than 20 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 Demonstration
The Permittee shall properly operate and maintain the boilers in a manner to prevent visible emissions. The Permittee shall maintain an operations manual and preventive maintenance plan. The Permittee shall maintain a log of maintenance performed that relates to combustion performance. [**Reference: COMAR 26.11.03.06C].** 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" [**Reference: COMAR 26.11.01.07**]

B. Operational Limits
The three (3) Burnham boilers shall burn natural gas only. **[Reference: MDE Permit to Construct Nos. 4-0223 & 4-0224, 5-0149 Part C(3) issued January 24, 2018]**

Compliance Demonstration
The Permittee shall retain records of plant-wide fuel usage and hours of operation for the boilers on site. **[Reference: MDE Permit to Construct Nos. 015-0079-4-0223 & 4-0224, & 5-0149, Part D issued January 24, 2018]**
The Permittee shall submit records of the quantity of fuel burned with the annual emissions certification report. **[Reference: Title V, Section III, Condition 8**]

C. NSPS Boilers
§60.40c - Applicability and delegation of authority.
(a) Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h).

Compliance Demonstration
The Permittee shall retain records of the amount of each fuel combusted during each calendar month. **[Reference: §60.48c(g)(2)]**
The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.
[Reference: §60.48c(j)]

Emission Units: EU 2-2: Emergency Generator

Emergency Generator:
One (1) Onan 1200 bhp (800 kW) diesel emergency generator. (**Reg. No. 9-0169**)

This emergency generator is subject to the requirements of 40 CFR 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

This emergency generator is not subject to the requirements of 40 CFR 60, Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines since this emergency generator was manufactured April 1, 2006. The engine was originally installed at another facility in 2001 and relocated to Cherry Hill in 2006. It is exempt from the requirements specifically pursuant to 40 CFR 60.4208(h) which states “The requirements of this section do not apply to owners or operators of Stationary CI ICE that have been modified,

reconstructed, and do not apply to engines that were removed from one existing location and reinstalled at a new location."

Compliance Status
Full compliance inspection was conducted on June 3, 2021, virtually and June 8, 2021, in person. No visible emissions were detected during the in-person inspection. This unit was not in operation at the time of inspection. Documentation of the sulfur content was obtained from the Facility's fuel supplier. The fuel supplier certification shows that ultra-low sulfur fuel typically has a sulfur content of 15 ppm or less (actual content is 2.9-ppm) which is less than the standard of 0.3 percent by weight or 3000-ppm.

Applicable Standards and 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."

Compliance Demonstration
The Permittee shall properly operate and maintain the emergency generator in a manner to prevent visible emissions. The Permittee shall maintain an operations manual and preventive maintenance plan. The Permittee shall maintain a log of maintenance performed that relates to combustion performance. [**Reference: COMAR 26.11.03.06C].** The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, "Report of Excess Emissions and Deviations" [**Reference: COMAR 26.11.01.07**]

B. Control of Sulfur Oxides Emissions
COMAR 26.11.09.07A(1)(c). 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: Distillate fuel oils, 0.3 percent."

Compliance Demonstration
The Permittee shall obtain a certification from the fuel supplier that the fuel oil is in compliance with the sulfur in fuel limitation. **[Reference: COMAR 26.11.03.06C]** The Permittee shall retain fuel supplier certifications stating that the fuel oil is in compliance with this regulation. The Permittee shall report fuel supplier certifications to the Department upon request [**Reference: COMAR 26.11.09.07C]**

Emission Units: EU 2-2 Cont'd

Emergency Generator
One (1) Onan 1200 bhp (800 kW) diesel emergency generator. (**Reg. No. 9-0169**)

Compliance Status
Full compliance inspection was conducted on June 3, 2021, virtually and June 8, 2021, in person. No visible emissions were detected during the in-person inspection. This unit was not in operation at the time of inspection. The last annual inspection on the generator was conducted October 5, 2020, based on records review during the June 2021 inspection.

Applicable Standards and limits:
40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
63.6595 - When do I have to comply with this subpart?
(a) *Affected sources.* (1)" ….. If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, **or 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.** …..".

§63.6603 - What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?
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 to this subpart.

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in **Table 2d** to this subpart and the operating limitations in Table 1b and Table 2b to 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
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, or local law under which the risk was deemed unacceptable.

§63.6605 - What are my general requirements for complying with this subpart?

“(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."

Compliance Demonstration

§63.6625 - What are my monitoring, installation, collection, operation, and maintenance requirements?

"(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (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."

"(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 emissions 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."

"(h) If you operate a new, reconstructed, or **existing stationary engine**, you must minimize the engine's time spent at 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, 2a, 2c, and **2d** to this subpart apply.

(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 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent 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."

§63.6640 - How do I demonstrate continuous compliance with the emission limitations and operating limitations?

(a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.

(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, Table 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.

"(f) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, 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 RICE in emergency situations.

(2) You may operate your emergency stationary RICE for the purpose 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 paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE 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 RICE beyond 100 hours per calendar year.
(ii) - (iii) [Reserved].
(3) *Not Applicable*.
(4) Emergency stationary RICE located at area sources of HAP 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 paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per 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."

§63.6655 - What records must I keep?
"(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;
(2) An existing stationary emergency RICE.
(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."

"(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, 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.
(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."

Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable." **[Footnote 2 of Table 2d]**

Emission Units: EU 3-1, EU 3-2, EU 3-3 & EU 3-4

EU 3-1: Shaping and Forming Equipment - General Exhaust.
EU 3-2: Filled FPM Products Area vented through the oxidizer control system (OCS).
EU 3-3: Batch Ovens to Atmosphere.
EU 3-4: FPM Shaping and Forming Equipment with VOC and PM.

Compliance Status
Full compliance inspection was conducted on June 3, 2021, virtually and June 8, 2021, in person. The tanks in the tank farm are equipped with conservation vents. No materials with a vapor pressure greater than 1.2-psia are stored in the tank farm. A monthly inspection to verify compliance with work practices is performed as part of the facility's monthly inspection. The Facility's Good Operating Practices were made available during the June 3, 2021, inspection.
The facility personnel stated that a monthly leak inspection is conducted as part as their monthly hazardous waste inspection as well as a daily leak checks on the tank farm. Leaks are repaired as quickly as possible after discovery. The leak inspection log also includes the information detailing the repair for the leak.

Applicable Standards and limits:

Control of VOC Emissions
a. **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 (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. “

Compliance Demonstration

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 maintain:
(1) Written descriptions of all "good operating practices" designed to minimize emissions of VOC from facility-wide operations. **[Reference: COMAR 26.11.19.02I]**
(2) 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]**
Good operating practices information as required by COMAR 26.11.19.02I shall be made available to the Department upon request

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b. **COMAR 26.11.19.16C** - Control of VOC 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."
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."

Compliance Demonstration

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 component 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 Permittee shall:

(1) 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
(2) 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)]

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

Emission Units: EU 3-2

EU 3-2: Filled FPM Products Area vented through the oxidizer control system (OCS).

The oxidizer control system (OCS) consists of three Regenerative Thermal oxidizers (Willie, SARA and Tec) and one afterburner (FRANKY).

Willie and Sara run during normal operation and Tec is installed as a backup oxidizer, for failures of the primary Willie and Sara oxidizers or during maintenance activities. Tec will also come online to help dissipate accumulated heat from high solvent loading at Willie and Sara oxidizers. The oxidizers and the ovens are connected together such that any oven can discharge into any one of the three oxidizers. This is accomplished by the use of a common manifold, where the process exhausts will be mixed.
Since operations are batch processes, the OCS is a more efficient use of the oxidizers. Fuel usage is decreased, reducing combustion emissions, and VOC load is maximized, increasing the destruction efficiency of the oxidizers.
Franky is installed on an R&D line, John Bonham Dryer. Emissions from this dryer are controlled by either the existing site OCS or the Franky Afterburner. Flow direction is controlled by the site OCS and recipe at the process dryer.

Compliance Status
Full compliance inspection was conducted on June 3, 2021, virtually and June 8, 2021, in person. No visible emissions were detected during the in-person inspection. During the in-person inspection all three oxidizers were operating. In addition, the processes and ovens cannot operate unless the OCS is at the proper temperature. Willie was operating at 1616 ^{o}F; SARA was operating at 1469 ^{o}F; while TEC was operating at 1656 ^{o}F. Temperature records are maintained electronically. The thermocouples are replaced annually. The OCS were stack tested as follows: TEC (03/2022); Willie (08/2021); SARA (08/2021); and afterburner FRANKY (02/2021). All having overall capture efficiency of 97%.

Applicable Standards and limits:

A. Control of Visible Emissions

COMAR 26.11.06.02C(1) – Visible Emission 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 greater than 20 percent opacity."
COMAR 26.11.06.02A(2) – General Exception. "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 visually inspect the exhaust of the oxidizer control system at least monthly for a 6-minute period when the process lines are in operation and shall record the result of each observation. If no visible emissions are observed in six consecutive monthly observations, the frequency of the visual observation may decrease from monthly to quarterly. If emissions are visible greater than 20 percent opacity from the oxidizer control system, the Permittee shall perform the

following unless it can be shown through a Method 9 test, that the visible emissions are zero percent opacity:
(a) inspect all process and/or control equipment related to emission point;
(b) perform all necessary repairs and/or adjustments to the oxidizers, within 48 hours, so that visible emissions in the exhaust gases are less than 20 percent opacity; and
(c) document, in writing, the results of the inspections and the repairs and/or adjustments made to the oxidizers.
If visible emissions greater than 20 percent opacity have not been eliminated within 48 hours, the Permittee shall perform a Method 9 observation for 18-minutes once daily when the process lines are in operation until the visible emissions have been reduced to less than 20 percent opacity.
The Permittee shall keep records of the results of visual emission observations and document any incidence of visible emissions and corrective action taken by the Permittee. **[Reference: COMAR 26.11.03.06C]**
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”

B. Control of VOC Emissions
COMAR 26.11.19.30E – General Requirements for FPM Process Installations
“(1) A person who owns or operates an FPM process installation that has actual uncontrolled VOC emissions of 50 pounds or more per day shall vent the emissions into a thermal oxidizer system or other control method approved by the Department to destroy or reduce VOC emissions by 85 percent or more, overall.

Compliance Demonstration
COMAR 26.11.19.30F. Demonstration of Compliance. “Compliance with this regulation shall be demonstrated using the applicable VOC test methods specified in COMAR 26.11.01.04C or other test method approved by the Department.”
The Permittee shall conduct performance testing of the primary oxidizer in the control system once during the 5-year term of the permit but no later than June 30, 2027. [**Reference: COMAR 26.11.03.06C].**
(2) If a thermal oxidizer is installed, the oxidizer combustion chamber shall be:
(a) Operated at a minimum combustion chamber temperature of 1400°F or other temperature approved by the Department that is demonstrated to achieve compliance with this regulation;
(b) Equipped with a continuous temperature monitor to record the oxidizer temperature; and
(c) Equipped with an alarm system that alerts the operator when the oxidizer combustion chamber temperature is less than the approved temperature; and

(d) Equipped with an interlock system that prevents operation of the FPM installation unless the approved control system is operating.
(3) If a source uses an alternative control method approved by the Department, the alternative control method shall be monitored as required by the Department.
(4) Equipment that is installed for the purpose of treating emissions or monitoring shall be operated, maintained, and as applicable, calibrated in accordance with the equipment vendor's specifications.
(5) A person who owns or operates an FPM compounding and tape or shape-forming installation shall minimize fugitive emissions of VOC by:
(a) Immediately enclosing all wet FPM during storage; and
(b) Covering dipping troughs when not in operation.
(6) A person who owns or operates an FPM coating installation that has actual uncontrolled VOC emissions of 20 pounds or more per day may not use a coating that has a VOC content exceeding 2.9 pounds per gallon unless the installation is equipped with a control device that meets the requirements in §E(2), (3), and (4) of this regulation." [**Reference: COMAR 26.11.19.30E(2)]**
The following records shall be kept on site for a period of at least five (5) years except for the design data, which shall be retained permanently. The records shall be made available to the Department on request:
(1) Permanent records**,** for the life of the equipment**,** of pertinent design data for the control device including manufacturer specifications and/or vendor guarantees for the control device and catalyst, catalyst requirements, design space velocity, operating limits, volume, and configuration of catalyst required;
(2) Maintenance records of types and dates of work performed on the oxidizer control system;
(3) Records of the combustion chamber temperature, which shall be greater than 1400 ^{o}F or other temperature approved by the Department any time a controlled process line is in operation; and
(4) Records of the results of destruction efficiency tests.
(5) The Permittee shall keep records of the damper position and corresponding chamber temperature on site for at least five years.
(6) The Permittee shall keep records of the annual replacement of the thermocouples on site for at least five years. **[Reference: COMAR 26.11.03.06C]**

The Permittee shall submit a test protocol to the Department for approval at least 30 days prior to proposed date of the test. The Permittee shall report results of the performance testing to the Department within 45 days after completion of the test.
The Permittee shall make the records of the annual thermocouples' replacements available to the Department upon request. **[Reference: COMAR 26.11.03.06C]**

Compliance Assurance Monitoring (CAM) Requirements [40 CFR Part 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 established monitoring for the purpose of:

(1) Documenting continued operation of the control measures within ranges of specified indicators of performances (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 causes of or caused 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 pre-control emissions of at least 100 percent of the major source amount; and must not otherwise be exempt from CAM. Applicability determinations are made on a pollutant-by-pollutant basis for each emission unit.

The pollutant specific emission units (PSEU) consist of dryers and ovens that support the fluoropolymers material (FPM) shaping and forming processes. The dryers and ovens are controlled by the Oxidizer Control System (OCS), which consist of three regenerative thermal oxidizers (RTO) and one afterburner.

The dryers and ovens are used to drive off liquid (VOC and/or water) from the fluoropolymer materials or to add certain properties to the product. The dryers and ovens are ducted to the OCS and operate as a batch process on an as needed basis depending on production demands. All the dryers and ovens are interlocked with the OCS so that they can only operate when the OCS is at temperatures greater than 1400 ^{o}F or other temperature approved by the Department. If temperatures approach 1400 ^{o}F (or other approved temperature), the alarm system will alert operators of low temperatures and if the low temperature is not corrected the OCS will go offline and production equipment will automatically be shutdown.

<u>Rationale for selection of Performance Indicators</u>
The OCS is used to reduce the VOC emissions generated from the evolution of VOCs from fluoropolymer materials.

“VOC destruction efficiency depends upon design criteria (i.e., chamber temperature, residence time, inlet VOC concentration, compound type, and degree of mixing). Thermal destruction of most organic compounds occurs

between 590 °C and 650 °C (1100 °F and 1200 °F)." (EPA-CICA Fact Sheet: Thermal Incinerator).

Manufacture Design Criteria

OSC Components	Maximum gas flow rate inlet	VOC Destruction
Oxidizer #1 (SARA)	25,000 scfm	95 to 98%
Oxidizer #2 (TEC)	25,000 scfm	95 to 98%
Oxidizer #3 (WILLIE)	30,000 scfm	95 to 98%
Afterburner (FRANKY)	1,000 scfm	99%

The RTOs and Afterburner utilize the opening and closing of dampers to routinely change the direction of airflow over the beds. This change of airflow direction helps to improve mixing of the gases and maintains uniform temperatures across the beds. Incomplete combustion in the RTOs and Afterburner may be indicated by visible emissions from the stack.

In accordance with 40 CFR 64.4(b)(1) - presumptively acceptable monitoring includes:
"Presumptively acceptable or required monitoring approaches, established by the permitting authority in a rule that constitutes part of the applicable implementation plan required pursuant to Title I of the Act, that are designed to achieve compliance with this part for particular pollutant-specific emissions units."

COMAR 26.11.19 achieves the requirements of Title I of the Clean Air Act, Section 110. State Implementation Plan (SIP) for VOC and requirement for this source is listed in COMAR 26.11.19.30E&F.

Rationale for selection of Indicator Ranges
Indicator ranges are based on requirements of the Maryland regulation and are supported by the stack testing data. VOC destruction of most organic compounds occurs between 1100 °F and 1200 °F. Results of the most recent stack tests are listed in the table below. Since TEC is used as a backup unit, it is not regularly tested; however, it was tested in 2022 and is on a regular preventative maintenance schedule just like the other units.

Test methods used to determine VOC destruction efficiency includes EPA Test Method 25A.

Stack Test Data

	Date of Compliance Demonstration	Combustion Temperature	Destruction Efficiency (average of 3 runs)
SARA, Oxidizer #1	08/24/2021	1320 ºF	99.20%
TEC, Oxidizer #2	03/1/2022	1400 ºF	95.80%
WILLIE, Oxidizer #3	08/24/2021	1600 ºF	98.57%
FRANKY, Afterburner	02/17/2021	1400 ºF	99.9%

Monitoring Approach.

Table IV-6			
COMPLIANCE ASSURANCE MONITORING REQUIREMENTS – PART 64			
EU 3-2: Process Dryers and Ovens **Oxidizer Control System (OCS) consisting of the following:** **Regenerative Thermal Oxidizer #1 (SARA, CH62581);** **Regenerative Thermal Oxidizer #2 (TEC, CH2369);** **Regenerative Thermal Oxidizer #3 (WILLIE, CH60535)** **Afterburner (FRANKY, CH20047178)**			
Applicable Requirement	**VOC:**		
I. Indicator	**Combustion Zone Temperature**	**Visible Emissions**	**Stack Testing**
II. Measurement Approach	The combustion zone temperature is measured using thermocouples that are located within the combustion zone.	Periodic observations of the OCS stack can indicate if visible emissions are present.	VOC Emissions are sampled using EPA Reference Method 25A, a continuous extractive sample (40 CFR 60 Appendix A)

III. Indicator Range	An excursion occurs when the combustion zone temperature drops below 1400 °F or other temperature approved by the Department, while processes are venting to the oxidizer. Audible and visual alarms will alert oxidizer operators to a temperature dropping below 1400 °F (or other Department approved temperature), and the oxidizer will automatically remove the permissive to operate from all users prior to the temperature reaching set point. An excursion will trigger an investigation and corrective action, and if lasting longer than one hour, a reporting requirement.	Quarterly observations are performed for a 6-minute period, while process lines are in operation and being controlled by the OCS or Afterburner.	Stack Test must show a destruction efficiency of 85 percent or greater.

IV Performance Criteria			
A. Data Representativeness	The combustion zone temperatures are measured using thermocouples located within the combustion zone. The minimum accuracy of the thermocouple is ±2 degrees F.	A Method 9 visible emissions observation is performed.	See EPA Reference Method 25A.
B. Verification of Operational Status	N/A	N/A	See EPA Reference Method 25A
C. QA/QC Practices and Criteria	Annual replacement of the combustion zone thermocouples	N/A	See EPA Reference Method 25A.
D. Monitoring Frequency	The combustion zone temperature is monitored	Quarterly observations	The stack test is performed within 180 days of startup of unit and once during each permit cycle.
E. Data Collection Procedures	Temperatures are recorded to a digital chart recorder. The data is saved locally on a storage card and is also saved on network servers.	The 6-minute observation shall be documented and maintained for a period of at least 5 years.	See EPA Reference Method 25A, the results are reported to the permitted authority.

F. Averaging Period	6-minute average	N/A	N/A

COMPLIANCE SCHEDULE

W. L. Gore & Associates, Inc. – Cherry Hill Plant is currently in compliance with all applicable air quality regulations.

TITLE IV – ACID RAIN

Not Applicable.

TITLE VI – OZONE DEPLETING SUBSTANCES

W. L. Gore & Associates, Inc. – Cherry Hill Plant is subject to Title VI requirements.

SECTION 112(r) – ACCIDENTAL RELEASE

W. L. Gore & Associates, Inc. – Cherry Hill Plant is not subject to the requirements of Section 112(r).

PERMIT SHIELD

The W. L. Gore & Associates, Inc. – Cherry Hill Plant 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) ✓ Space heaters utilizing direct heat transfer and used solely for comfort heat;

(2) ✓ 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;

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

(a) No. 30 Storage of lubricating oils;

(b) No. 13 Unheated storage of VOC with an initial boiling point of 300 °F (149 °C) or greater;

(4) ✓ 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;

(5) ✓ 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;

(6) ✓ Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;

(7) ✓ Laboratory fume hoods and vents;

For the following, attach additional pages as necessary:

(8) 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):

General Category	Description	CH Nos.
Misc	Bag Dump Stations	0
Shaping	FM Line	45159
Shaping	Heat treat exhausts w/ IK dip	65128
Shaping	Tenter for wet tapes	2180
Forming	R&D ACIS	62347
Forming	R&D Jenny	62924
Drying	COAG Oven	0

(9) any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act (list and describe):

General Category	Describe this equipment	CH Nos.
Conditioning	Pellet Oven	74820
Conditioning	Pellet Oven	1551361
Conditioning	Pellet Oven	2166
Conditioning	Pellet Oven	2413
Conditioning	Pellet Oven	2443
Conditioning	Pellet Oven	2444
Conditioning	Pellet Oven	2445
Drying	Lab Ovens	963
Drying	Lab Ovens	2211
Forming	Mixing and Compounding	1931985
Misc	Chem Storage Cabinets	0
Misc	Paint Booth	5800
Misc	Slitter	1058
Misc	Welding Hood	0
Misc	Gas fired heater, 60 MBH	0
Misc	Gas fired heater, 60 MBH	0
Misc	Gas fired heater, 60 MBH	0
Shaping	Calendaring line	244
Shaping	Calendaring line	825
Shaping	Calendaring line	1367
Shaping	Calendaring line	1368
Shaping	Calendaring line	1693
Shaping	Calendaring line	2055
Shaping	Calendaring line	74770
Shaping	Calendaring line	1342
Shaping	Calendaring line	2149
Shaping	Calendaring lines	2555
Shaping	Calendaring w/dip	242
Shaping	Calendaring w/dip	75616
Shaping	Calendaring lines	126
Shaping	Heat treat exhaust	62933
Shaping	Heat treat exhaust	74794
Shaping	Heat treat exhaust	853
Shaping	Heat treat exhaust	982
Shaping	Heat treat exhaust	1425
Shaping	Heat treat exhaust	1761
Shaping	Heat treat exhaust	2344

General Category	Describe this equipment	CH Nos.
Shaping	Heat treat exhaust	61670
Shaping	Heat treat exhaust	1504863
Shaping	Heat treat exhaust	2310
Shaping	Heat treat exhaust	6044
Shaping	Heat treat exhaust	20015459
Shaping	Heat treat exhaust	20043397
Shaping	Heat treat exhaust	20043398

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 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 nuisance or air pollution is created."

   (c) COMAR 26.11.15.05 - Control Technology Requirements.
   "A. New or Reconstructed Installations. A person may not construct, reconstruct, operate, or cause to be constructed, reconstructed, or operated, any new installation or source that will discharge a toxic air pollutant to the atmosphere without installing and operating T-BACT."

   (d) COMAR 26.11.15.06 - Ambient Impact Requirement.
   A. Requirements for New Installations, Sources, or Premises.
   (1) Except as provided in §A(2) of this regulation, a person may not construct, modify, or operate, or cause to be constructed, modified, or operated, any new installation or source without first demonstrating to the satisfaction of the Department using procedures established in this chapter that total allowable emissions from the premises of each toxic

air pollutant discharged by the new installation or source will not unreasonably endanger human health.
(2) If a new installation or source will discharge a TAP that is not listed in COMAR 26.11.16.07 and will be part of an existing premises, then emissions of that TAP from existing sources or existing installations on the premises may be omitted from a screening analysis unless the TAP is added to COMAR 26.11.16.07.

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.

W.L. Gore & Associates, Inc.
Cherry Hill Facility
2401 Singerly Road
Elkton, MD 21921

Title V, Part 70 Application for Renewal Permit #015-0079

June 30, 2022

Title V, Part 70 Application Renewal
W.L. Gore & Associates, Inc. – Cherry Hill Site
June 30, 2022

TABLE OF CONTENTS

Section I. Introduction

Summary of Title V Application

W.L. Gore & Associates, Inc (Gore) Cherry Hill plant hereby submits an application for a Title V Part 70 Operating permit. Emissions include both stack and fugitive. This application is made pursuant to the requirements contained in the State of Maryland, Code of Maryland Air Regulations (COMAR) 26.11.03.

The facility is classified as a major source (based on potential to emit) for Volatile Organic Compound (VOC) and Nitrogen Oxide (NOx) emissions as defined in COMAR 26.11.02.01C as well as Part D of Title 1 of the Clean Air Act (CAA). This document is a complete Part 70 Operating Permit Renewal Application and includes all Code of Maryland Air Regulation (COMAR) Title 26, Subtitle 11 and the Code of Federal Regulation (CFR) air quality applicable requirements. In Section 1 of this application, the responsible official of Gore certifies this operating permit application.

Organization of the Permit Application
Emission Unit Groups

The EPA White Paper for Streamlined Development of Part 70 Operating Permit Applications (July 10, 1995) provided guidance for permits issued pursuant to the Title V Part 70 Operating permit program adopted under COMAR 26.11.03. This guidance had suggested the development of emission unit groups; each group should include two or more emission points that shared the same applicable requirements. Gore has established the following protocol for the emission unit groups in this operating permit application:

Emission Unit Group	Description
EU1-x	Particulate matter units
EU2-x	Combustion units (boilers)
EU3-x	Process units

Each group is represented by an "EU#-#" where the first number corresponds to the emission category (above) and the second number is ordered consecutively. This system is used throughout the application form and appendices. See Appendix B for the complete list of emission units.

Section II. Permit/Application Shield

Permit/Application Shield

W. L. Gore & Associates, Inc. (Gore) formally requests a permit shield pursuant to COMAR 26.11.03.23 for the Cherry Hill Plant located in Cecil County, Elkton, Maryland. Gore understands that a timely and complete application must be submitted in order to receive this permit shield. Gore believes that they have satisfied all requirements. Gore further realizes that the permit shield, as specified in COMAR 26.11.03.23B, shall cover only applicable requirements of the Clean Air Act that are included and are specifically identified in the permit and applicable requirements specifically identified by the Department as being not applicable to the source, but only if the permit includes that determination or a summary of the determination.

Gore will continue to operate under the application shield of COMAR 26.11.02.01B(10) and 26.11.03.01D until the Part 70 permit is issued or denied. If additional information requests are made by the State during the review of this application, Gore shall provide the information by the reasonable deadline.

MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard
(410) 537-3000 1-800-633-6101 http://www.mde.state.md.us

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: W.L. Gore & Associates, Inc.		
Street Address: 555 Paper Mill Road		
City: Newark	State: Delaware	Zip Code: 19711
Telephone Number 410-398-6400		Fax Number 410-398-5752

Facility Information:

Name of Facility: W.L. Gore & Associates, Inc. – Cherry Hill Plant		
Street Address: 2401 Singerly Road		
City: Elkton	State: Maryland	Zip Code: 21921
Plant Manager: Matthew Burlew	Telephone Number: 410-398-6400	Fax Number:
24-Hour Emergency Telephone Number for Air Pollution Matters: 410-506-7945		

List, on a separate page, the names and telephone numbers of other facility owners and persons with titles.

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

[X] 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 Matthew Burlew 6-27-2022

SIGNATURE DATE

Matthew Burlew
PRINTED NAME

Plant Leader
TITLE

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).
Custom compounding of purchased plastic resin (SIC 3087, NAICS 326199)

End products are FPM intermediates

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:
(tons/yr, based on 2021 Emission Cert. Report)

PM10 0.645 NOx 8.26 VOC 14.43 Sox 0.050 CO 19.004 HAPs 0

3. Include With the Application:

Flow Diagrams showing all emissions units, emission points, and control devices;
- Appendix A:
  - Facility Plot Plan with Exhaust Points
  - Oxidizer Control System Flow Diagram
  - Dust Collection System
  - General Exhaust Flow Diagram
- Appendix B:
  - 2021 Compliance and Emission Certification Reports

SECTION 3A-1. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.:	2. MDE Registration No.:(if applicable)
EU1-1 *Particulate Matter Emitting Units* 1a. Date of installation (month/year): See Below	See below

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Emissions from the equipment listed below are controlled by the onsite dust collectors. There are 3 dust collectors onsite. See Section 4-1.

Installation Date	General Category	Describe this Equipment	CH nos.	Permit #	Title V EU#	Control Device	CH Emission Point
5/1/2001	Control	Dust Collector	0	6-0104	1-1	CONTROL	DC-1, DC-2
7/1/2002	Forming	Mixing & Compounding	63203	6-0104	1-1	Dust Collector	DC-1
5/1/2001	Forming	Mixing and Compounding	62347	6-0104	1-1	Dust Collector	DC-1
8/1/2013	Forming	High Shear Mixers	20017616	6-0328	1-1	Dust Collector	DC-1
*2020	Forming	Mixing & Compounding	0	6-0376	1-1	Dust Collector	DC-2
*2/1/2021	Forming	Calendaring	0	6-0385	1-1	Dust Collector	DC-2
*1/2023	Forming	Mixing & Compounding	*0*	TBD	1-1	Dust Collector	DC-2

*Addition since the issuance of current permit

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: None

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:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. N/A		
2.		
3.		

6. Emissions in Tons: *Based on 2021 Emission Cert. Report*

A. Actual Major: N/A Potential Major: N/A (note: before control device)

B. Actual Emissions: NOx 0 SOx 0 VOC 0 PM10 0.478 HAPs 0

SECTION 3A-2. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU2-1 *Boilers* 1a. Date of installation (month/year): See Below	2. MDE Registration No.:(if applicable) See below

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Installation Date	General Category	Describe this Equipment	CH nos.	Permit#	Title V EU#	Control Device	Fuel	CH Emission Point
12/16/2006	Boiler	Burnham 10.4 MMbtu	0	4-0223	2-1	N/A	NG	SB
12/16/2006	Boiler	Burnham 10.4 MMbtu	0	4-0224	2-1	N/A	NG	SB
*1/24/2018	Boiler	Burnham 10.4 MMbtu	0	5-0149	2-1	N/A	NG	SB

*Addition since the issuance of current permit

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: None

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: N/A hours/batch N/A batches/day

N/A days/year

5. Fuel Consumption: (*Based on 2021 usage)*

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	< 20 grains/ 100 cf	60.21 mmscf
2.		
3.		

6. Emissions in Tons: *Based on 2021 Emission Cert. Report*

A. Actual Major: N/A Potential Major: N/A (note: before control device)

B. Actual Emissions: NOx 1.109 SOx 0.018 VOC 0.166 PM10 0.057 HAPs 0.00

SECTION 3A-3. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.:	2. MDE Registration No.:(if applicable)
EU2-2 *Emergency Generator* 1a. Date of installation (month/year): See Below	9-0169

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Installation Date	General Category	Description	CH nos.	Permit#	Title V EU#	Control Device	Fuel	CH Emission Point
Dec-06	EGEN	Emergency Generator, 800 KW	0	9-0169	2-2	N/A	D	EGEN

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: Permit to Construct 9-0169, Part D(2)

Continuous Processes: N/A hours/day N/A days/year

Batch Processes: N/A hours/batch N/A batches/day

N/A days/year *500 hours/year*

5. Fuel Consumption: *(Based on 2021 usage)*

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Diesel	<0.3%	114.30 gallons
2.		

6. Emissions in Tons: *(Based on 2021 Emission Cert Report)*

A. Actual Major: NO Potential Major: NO (note: before control device)

B. Actual Emissions: NOx 0.015 SOx 0.000 VOC 0.0003 PM10 0.000 HAPs 0.00

SECTION 3A-4. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.:	2. MDE Registration No.: (if applicable)
EU 3-1 Shaping and Forming Equipment - General Exhaust 1a. Date of installation (month/year): See Below	See Below

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Emissions from the equipment listed below are exhausted through the General Exhaust System. Each individual processes are tied into a common duct system with one emission point, "GE".

Installation Date	General Category	Description	CH nos.	Permit#	Title V EU#	Control Device	CH Emission Point
2012	Forming	Extruder	20000806	6-0317	3-1	N/A	GE
pre-1990	Forming	Extruder	976	6-0318	3-1	N/A	GE
pre-1990	Forming	Extruder	2052	6-0324	3-1	N/A	GE
2007	Forming	Extruder	1991534	6-0326	3-1	N/A	GE
pre-1990	Forming	Extruder	2371	6-0327	3-1	N/A	GE
Oct 2015	Forming	Calendaring Line	20031600	6-0348	3-1	N/A	GE
pre-1990	Forming	Extruder	2262	6-0351	3-1	N/A	GE
2013	Forming	Extruder	13831	6-0352	3-1	N/A	GE
pre-1990	Forming	Extruder	2013	6-0353	3-1	N/A	GE
2017	Forming	Extruder	20038276	6-0361	3-1	N/A	GE
pre-1990	Forming	Extruder	74837	7-0045	3-1	N/A	GE
2011	Forming	Extruder	20006547	7-0045	3-1	N/A	GE
*2018	Forming	Extruder	20032269	6-0367	3-1	N/A	GE
*2019	Forming	Calendaring Line	Hulk 4	6-0372	3-1	N/A	GE
*2/2021	Forming	Calendaring Line	20048553	6-0384	3-1	N/A	GE
*Future	Forming	Calendaring Line	Fluffernutter 2	6-0387	3-1	N/A	GE

*Addition since the issuance of current permit

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

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:

Type(s) of Fuel % Sulfur Annual Usage (specify units)

1. N/A

6. Emissions in Tons: *Based on 2021 Emission Cert. Report*

A. Actual Major: NO Potential Major: YES (note: before control device)

B. Actual Emissions: NOx 0.0 SOx 0.0 VOC 3.50 PM10 0.0 HAPs 0.0

SECTION 3A-5. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU 3-2 Drying Ovens Ventilated to OCS 1a. Date of installation (month/year): See Below	2. MDE Registration No.:(if applicable) See Below

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
The emission units listed below exhaust to the Oxidizer Control System, which consists of 3 regenerative thermal oxidizers. See Section 4-2.

Installation Date	General Category	Description	CH nos.	Permit#	Title V EU#	Fuel	CH Emission Point
pre- 7/1/88	Drying	Dryer	1314	7-0045	3-2	N/A	OCS
pre-1990	Drying	Dryer	1316	6-0260	3-2	N/A	OCS
pre- 7/1/88	Drying	Dryer	1381	7-0045	3-2	N/A	OCS
1/1/1995	Drying	Dryer	2203	6-0102	3-2	NG	OCS
12/1/1996	Drying	Dryer	2204	6-0131	3-2	NG	OCS
10/1/1996	Drying	Dryer	2383	6-0126	3-2	NG	OCS
7/1/1997	Drying	Dryer	2404	6-0276	3-2	NG	OCS
3/1/1997	Drying	Batch Oven	2440	6-0173	3-2	N/A	OCS
May-99	Drying	Batch Oven	2615	6-0279	3-2	N/A	OCS
Mar-12	Drying	Dryer	60265	6-0311	3-2	NG	OCS
12/1/1999	Drying	Dryer	60648	6-0278	3-2	NG	OCS
Aug-07	Drying	Dryer	74799	6-0275	3-2	N/A	OCS
Dec-13	Drying	Dryer	20011771	9-0325	3-2	N/A	OCS
*4/18/2018	Drying	Dryer	20038790	6-0363	3-2	N/A	OCS
*April-18	Drying	Dryer	20039595	6-0365	3-2	N/A	OCS
Dec- 21	Drying	Dryer	0	6-0381	3-2	N/A	OCS
*TBD	Drying	Dryer	0	6-0396	3-2	NG	OCS
1/2023	Drying	Dryer	0	TBD	3-2	N/A	OCS
1/2023	Drying	DSL2		TBD	3-2	N/A	OCS
*12/2020	**Control**	OCS	0	6-0363	3-2	NG	OCS
6/1/1996	**Control**	OCS	2369	6-0173	3-2	NG	OCS
3/1/1999	**Control**	OCS	60535	6-0173	3-2	NG	OCS
1/1/2002	**Control**	OCS	62581	6-0173	3-2	NG	OCS

* Addition since issuance of current permit

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

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: (*Based on 2021 usage)*

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	< 20 grains/100 cf	107.67 mmscf
2.		

6. Emissions in Tons: *Based on 2021 Emission Cert. Report*

A. Actual Major: N/A Potential Major: YES (note: before control device)

B. Actual Emissions: NOx 7.03 SOx 0.03 VOC 10.54 PM10 0.10 HAPs 0.0

SECTION 3A-6. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU 3-3 Batch Ovens to Atmosphere 1a. Date of installation (month/year): See Below	2. MDE Registration No.:(if applicable) See Below

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Installation Date	General Category	Describe this Equipment	CH nos.	Permit #	Title V EU#	Control Device	CH Emission Point
Jun-92	Drying	R&D Oven	2365	6-0041	3-3	N/A	O-1
Oct-03	Drying	R&D Oven	2366	6-0041	3-3	N/A	O-2
Aug-82	Drying	Lab Ovens	2281	6-0130	3-3	N/A	O-3
May-99	Drying	Lab Ovens	2505	6-0130	3-3	N/A	O-4

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

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:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. N/A		
2.		
3.		

6. Emissions in Tons: *Based on 2021 Emission Cert. Report*

A. Actual Major: NO Potential Major: NO (note: before control device)

B. Actual Emissions: NOx 0.0 SOx 0.0 VOC 0.048 PM10 0.0 HAPs 0.0

SECTION 3A-7. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.:	2. MDE Registration No.: (if applicable)
EU 3-4 1a. Date of installation (month/year): See Below	See Below

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):

Emissions from the equipment listed below are exhausted through the General Exhaust System and/or onsite duct collectors.

Installation Date	General Category	Description	CH nos.	Permit#	Title V EU#	Control Device	CH Emission Point
2018	Forming	High Shear Mixer	0	6-0373	3-4	N/A	GE
*10/2017	Forming	Calendar	0	6-0390	3-4	N/A	DC-3/GE

*Addition since the issuance of current permit

4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:

General Reference: N/A

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:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. N/A		

6. Emissions in Tons: *Based on 2021 Emission Cert. Report*

A. Actual Major: NO Potential Major: NO (note: before control device)

B. Actual Emissions: NOx 0.0 SOx 0.0 VOC 0.159 PM10 0.007 HAPs 0.0

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU 1-1 , EU 3-4 **General Reference:** COMAR 26.11.06.02C(1)

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Control of Visible Emissions

Visible Emission Standards. "A person my not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is greater than 20 percent opacity."

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports to be submitted:

[] Quarterly Monitoring Report:

[X] Semi-Annual Monitoring Report: January 31 and July 31

[X] Annual Compliance Certificaiton: April 1

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: The Permittee shall conduct a monthly 6-month visual observation of the baghouse exhaust. The visual observation must be conducted while the baghouse is in operation. If no visible emissions are observed in six consecutive monthly observations from the baghouse exhaust, the Permittee may decrease the frequency of visual observations from monthly to quarterly for the baghouse exhaust. If visible emissions are observed during any quarterly visual observation, the Permittee must resume the observation of the baghouse exhaust on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly visual observations. If visible emissions are observed during any observation, the Permitee must conduct and 18-minute test of opacity in accordance with Method 9. The Method 9 test must begin within 24-hour of any observation of visible emissions.

Testing: Reference None Describe:

Record Keeping: Reference COMAR 26.11.03.06C Describe: The Permitee shall maintain on site a log of the dates and results of visible emissions observations for a period of at least 5 years.

Reporting: Reference COMAR 26.11.01.07 Describe: 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"

Frequency of submittal of the compliance demonstration: Semi-Annual

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU 1-1 , EU 3-4 **General Reference:** COMAR 26.11.06.03B

Briefly describe the Emission Standard/Limit or Operational Limitation:

Particulate Matter from Confined Sources. "A person may not cause or permit particulate matter to be discharged from any installation constructed on or after January 17, 1972 in excess of 0.05 gr/scfd (115 kg/dscm)."

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports to be submitted:

[] Quarterly Monitoring Report:

[X] Semi-Annual Monitoring Report: January 31 and July 31

[X] Annual Compliance Certificaiton: April 1

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: The Permittee shall update and maintain the preventive maintenance plan for the baghouse that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frames established in the plan and shall maintain a log with records of the dates and description of the maintenance that was performed.

Testing: Reference None Describe:

Record Keeping: Reference COMAR 26.11.03.06C Describe: The Permittee shall submit a copy of the preventative maintenance plan and a record of the dates of and description of maintenance activity performed. The Permittee shall maintain records of the baghouse malfunctions and the corrective actions taken to bring into proper operation.

Reporting: Reference COMAR 26.11.03.06C Describe: The Permittee shall submit a copy of the preventive maintenance plan, records of maintenance activities and corrective actions taken to the Department upon request.

Frequency of submittal of the compliance demonstration: Semi-Annual

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU 2-1 **General Reference:** COMAR 26.11.09.05A

Briefly describe the Emission Standard/Limit or Operational Limitation:

COMAR 26.11.09.05A(1) - Fuel Burning Equipment. "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 greater than 20 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 visble emissions do not occur for more than 6 consecutive minutes in any sixty minute period."

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports to be submitted:

[] Quarterly Monitoring Report:

[X] Semi-Annual Monitoring Report: January 31 and July 31

[X] Annual Compliance Certificaiton: April 1

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.06.06C Describe: The Permittee shall properly operate and maintain the boilers in a manner to prevent visible emissions.

Testing: Reference None Describe:

Record Keeping: Reference COMAR 26.11.03.06C Describe: The Permittee shall maintain an operations manual and preventive maintenance plan. The Permittee shall maintain a log of maintenance performed that relates to combustion performance.

Reporting: Reference COMAR 26.11.01.07 Describe: 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."

Frequency of submittal of the compliance demonstration: Semi-Annual

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU 2-1 **General Reference:** MDE PTC Nos. 4-0223 & 4-0224, 5-0149 Part C(3) issued January 24, 2018

Briefly describe the Emission Standard/Limit or Operational Limitation:

The three (3) Burnham boilers shall burn natural gas only.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports to be submitted:

[] Quarterly Monitoring Report:
[X] Semi-Annual Monitoring Report: January 31 and July 31
[X] Annual Compliance Certificaiton: April 1

Methods used to demonstrate compliance:

Monitoring: Reference None Describe:

Testing: Reference None Describe:

Record Keeping: Reference MDE PTC Nos. 4-0223 & 4-0224, 5-0149 Part D issued January 24, Describe: The Permittee shall retain records of type of fuel used and hours of operation for the boilers on site.

Reporting: Reference Title V, Section III, Condition 8 Describe: The Permittee shall submit records of the quantity and type of fuels burned with the annual emissions certification report.

Frequency of submittal of the compliance demonstration: Semi-Annual

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU 2-1 **General Reference:** 60.40c

Briefly describe the Emission Standard/Limit or Operational Limitation:

Applicability and delegation of authority. (a) Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) or less, but greater than or equal to 2.9 MW.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports to be submitted:

[] Quarterly Monitoring Report:

[X] Semi-Annual Monitoring Report: January 31 and July 31

[X] Annual Compliance Certificaiton: April 1

Methods used to demonstrate compliance:

Monitoring: Reference None Describe:

Testing: Reference None Describe:

Record Keeping: Reference 60.48c(g)(2)) Describe: The Permittee shall retain records of the amount of each fuel combusted during each calendar month.

Reporting: Reference 60.48c(j) Describe: The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

Frequency of submittal of the compliance demonstration: Semi-Annual

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU 2-2 **General Reference:** COMAR 26.11.09.05E

Briefly describe the Emission Standard/Limit or Operational Limitation:

"(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 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."

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports to be submitted:

[] Quarterly Monitoring Report:
[X] Semi-Annual Monitoring Report: January 31 and July 31
[X] Annual Compliance Certificaiton: April 1

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: The Permittee shall properly operate and and maintain the emergency generator in a manner to prevent visible emissions.

Testing: Reference None Describe:

Record Keeping: Reference COMAR 26.11.03.06C Describe: The Permittee shall maintain an operations manual and preventive maintenance plan. The Permittee shall maintain a log of maintenance performed that relates to combustion performance.

Reporting: Reference COMAR 26.11.01.07 Describe: The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, "Report of Excess Emissions and Deviations."

Frequency of submittal of the compliance demonstration: Semi-Annual

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU 2-2 **General Reference:** COMAR 26.11.09.07A(1)c

Briefly describe the Emission Standard/Limit or Operational Limitation:

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 limiations: Distillate fuel oils, 0.3 percent."

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports to be submitted:

[] Quarterly Monitoring Report:
[X] Semi-Annual Monitoring Report: January 31 and July 31
[X] Annual Compliance Certificaiton: April 1

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: The Permittee shall obtain a certification from the fuel supplier that the fuel oil is in compliance with the sulfur in fuel limitation.

Testing: Reference None Describe:

Record Keeping: Reference COMAR 26.11.09.07C Describe: The Permittee shall retain fuel supplier certifications stating that the fuel oil is in compliance with this regulation.

Reporting: Reference COMAR 26.11.09.07C Describe: The Permittee shall report fuel supplier certifications to the Department upon request.

Frequency of submittal of the compliance demonstration: Semi-Annual

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU 3-1, EU 3-2, EU 3-3, EU 3-4 **General Reference:** COMAR 26.11.19.02I

Briefly describe the Emission Standard/Limit or Operational Limitation:

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 (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.

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports to be submitted:

[] Quarterly Monitoring Report: _____

[X] Semi-Annual Monitoring Report: January 31 and July 31

[X] Annual Compliance Certificaiton: April 1

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: The Permittee shall conduct facility-wide inspections at least once per calendar month to determine the compliance status of facility operations with regard to implmentation of "good operating practices: designed to minimize emissions of VOC.

Testing: Reference None Describe:

Record Keeping: Reference COMAR 26.11.03.06C Describe: (1) Written descriptions of all "good operating practices" designed to minimize emissions of VOC facility-wide operations. (2) 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.

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

Frequency of submittal of the compliance demonstration: Semi-Annual

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU 3-1, EU 3-2, EU 3-3, EU 3-4 **General Reference:** COMAR 26.11.19.16

Briefly describe the Emission Standard/Limit or Operational Limitation:

Control of VOC Equipment Leaks.

COMAR 26.11.19.16C - 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.

D. 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."

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports to be submitted:

[] Quarterly Monitoring Report:

[X] Semi-Annual Monitoring Report: January 31 and July 31

[X] Annual Compliance Certificaiton: April 1

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.19.16C and D Describe: The Permittee shall: (1) Visually inspect all the 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 ID 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 reparied; (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. 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 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 occurance; (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.

Testing: Reference None Describe:

Record Keeping: Reference COMAR 26.11.19.16C(6) Describe: The Permittee shall: (1) Maintain a log that includes the name of the person conducting that 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 identificaiton number, the date the part was ordered, and the date the VOC leak was repaired; and (2) 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' occurance.

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

Frequency of submittal of the compliance demonstration: Semi-Annual

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU 3-2 **General Reference:** COMAR 26.11.06.02C(1)

Briefly describe the Emission Standard/Limit or Operational Limitation:

A. Control of Visible Emissions

Visible Emission Standards. "A person my not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is greater than 20 percent opacity."

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports to be submitted:

[] Quarterly Monitoring Report:
[X] Semi-Annual Monitoring Report: January 31 and July 31
[X] Annual Compliance Certificaiton: April 1

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.03.06C Describe: The Permittee shall visually inspect the exhaust of the oxidizer control system at least monthly for a 6-minute period when the process lines are in operation and shall record the result of each observation. If no visible emissions are observed in six consecutive monthly observations, the frequency of the visual observation may decrease from monthly to quarterly. If emissions are visible greater than 20 percent opacity from the oxidizer control system, the Permittee shall perform the following unless it can be shown through a Method 9 test, that the visible emissions are zero percent opacity: (a) inspect all process and/or control equipment related to emission point; (b) perform all necessary repairs and/or adjustments to the oxidizers, within 48 hours, so that visible emissions in the exhaust gases are less than 20 percent opacity; and c) document, in writing, the results of the inspections and the repairs and/or adjustments made to the oxidizers.

If visible emissions greater than 20 percent opacity have not been eliminated within 48 hours, the Permittee shall perform a Method 9 observation for 18-minutes once daily when the process lines are in operation until the visible emissions have been reduced to less than 20 percent opacity.

Testing: Reference None Describe:

Record Keeping: Reference COMAR 26.11.03.06C Describe: The Permittee shall keep records of the results of visual emission observations and document any incidence of visible emissions and corrective action taken by the Permittee

Reporting: Reference COMAR 26.11.03.06C Describe: 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."

Frequency of submittal of the compliance demonstration: Semi-Annual

SECTION 3B. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Emissions Unit No.: EU 3-2 **General Reference:** COMAR 26.11.19.30E

Briefly describe the Emission Standard/Limit or Operational Limitation:

B. Control of VOC Emissions

(1) A person who owns or operates an FPM process installation that has actual uncontrolled VOC emissions of 50 pounds or more per day shall vent the emissions into a thermal oxidizer system or other control method approved by the Department to destroy or reduce VOC emissions by 85 percent or more, overall."

Permit Shield Request: Yes

Compliance Demonstration:

Check appropriate reports to be submitted:

[] Quarterly Monitoring Report:

[X] Semi-Annual Monitoring Report: January 31 and July 31

[X] Annual Compliance Certificaiton: April 1

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.19.30E(2) Describe: (2) If a thermal oxidizer is installed, the oxidizer combustion chamber shall be: (a) Operated at a minimum combustion chamber temperature of 1400°F or other approved temperature approved by the Department that is demonstrated to achieve compliance with this regulation. (b) equipped with a continuous temperature monitor to record the oxidizer termperature; (c) Equipped with an alarm system that alerts the operator when the oxidizer combustion chamber temperature is less than the approved temperature; and (d) Equipped with an interlock that prevents operation of the FPM installation unless the approved control system is operating. (3) If a source uses an alternative control method approved by the Department, the alternative control method shall be monitored as required by the Department. (4) Equipment that is installed for the purpose of treating emissions or monitoring shall be operated, maintained, and as applicable, calibrated in accordance with the equipment vendor's specifications. (5) A person who owns or operates an FPM compounding and tape or shape-forming installation shall monitor fugitive emissions of VOC by: (a) Immediately enclosing all wet FPM during storage; and (b) Covering dipping troughs when not in operation. (6) A person who owns or operates an FPM coating installation that has an actual uncontrolled VOC emissions of 20 pounds or more per day may not use a coating that has a VOC content exceeding 2.9 pounds per gallon unless the installation is equipped with a control device that meets the requirements in E(2), (3), (4) of this regulation."

The Permittee shall annually replace the thermocouples that monitor the temperatures to the oxidizer control system and afterburner

Testing: Reference COMAR 26.11.19.30F Describe: "Compliance with this regulation shall be demonstrated using the applicable VOC test methods specified in COMAR 26.11.01.04C or other approved test method approved by the Department." The Permittee shall conduct performance testing of the primary oxidizer in the control system once during the 5-year term of the permit. [Reference: COMAR 26.11.03.06C]

Record Keeping: Reference COMAR 26.11.03.06C Describe: The following records shall be kept on site for a period of at least five (5) years except for the design data, which shall be retained permanently. The records shall be made available to the Department on request: (1) Permanent records, for the life of the equipment, of pertinent design data for the control device including manufacturer specifications and/or vendor guarantees for the control device and catalyst, catalyst requirements, design space velocity, operating limits, volume and configuration of catalyst required; (2) Maintenance records of types and dates of work performed on the oxidizer control system; (3) Records of the combustion chamber temperature, which shall be greater than 1400 °F or other temperature approved by the Department that is demonstrated to achieve compliance with this regulation, any time a controlled process line is in operation; and (4) Records of the results of destruction efficiency tests.

(5) The Permittee shall keep records of the damper position and corresponding champer temperature on site for at least five years.

(6) The Permittee shall keep records of the annual replacement of the thermocouples on site for at least five years.

Reporting: Reference COMAR 26.11.03.06C Describe: The Permittee shall submit a test protocol to the Department at least 30 days prior to the propose date of the test. The Permittee shall report results of the performance testing to the Department within 45 days after the completion of the test. The Permittee shall make records of the annual thermocouples replacements made available to the Department upon request.

Frequency of submittal of the compliance demonstration: Semi-Annual

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.: N/A **Permit to Construct No.** N/A

Emissions Point No.	Date Permit Issued	Condition No.	Brief Description of Condition and Reason for Exclusion

Emissions Unit No.: _____ Permit to Construct No. _____

Emissions Point No.	Date Permit Issued	Condition No.	Brief Description of Condition and Reason for Exclusion

Emissions Unit No.: _____ Permit to Construct No. _____

Emissions Point No.	Date Permit Issued	Condition No.	Brief Description of Condition and Reason for Exclusion

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.

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 4-1. CONTROL EQUIPMENT

1. Associated Emissions Units No. :	2. Emissions Point No.:
EU 1-1: 6-0104 EU 3-4: 6-0390	DC-1, DC-2, DC-3

3. Type and Description of Control Equipment :

DC-1 ANPI Dust Collector, model No 3RC36
DC-2 Donaldson Torit Downflo Evlution Model – DFE 4-24
DC-3 CAM-AIRO Model – CA2-1D

4. Pollutants Controlled:	Control Efficiency:
Particulate Matter	DC-1 ~85% DC-2 ~90% DC-3 ~90%

5. Capture Efficiency:

DC-1 ~90%
DC-2 ~90%
DC-3 ~90%

SECTION 4-2. CONTROL EQUIPMENT

1. Associated Emissions Units No.:

EU3-2: 6-0173, 6-0363

2. Emissions Point No.:

OCS

3. Type and Description of Control Equipment:

The Oxidizer Control System (OCS) includes the following regenerative thermal oxidizers: SARA (oxidizer #1), TEC (oxidizer #2) and WILLIE (oxidizer #3). The FRANKY (afterburner) was installed to be used on a R&D line.

4. Pollutants Controlled:

VOC

Control Efficiency:

TEC, Oxidizer #2	95.80%	03/2022
Willie, Oxidizer #3	98.57%	08/2021
SARA, Oxidizer #1	99.20%	08/2021
FRANKY, Afterburner	99.9%	02/2021

5. Capture Efficiency:

Varies by Emission Unit: Overall > 97%

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.

Pollutant	**N/A**				
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 #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions					
Total					

SECTION 6. 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:

N/A

2. Brief Description:

_____

_____

_____

3. Reasons for Proposed Exemption or Justification of Non-applicability:

_____

_____

_____

_____

_____

SECTION 7. COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS

1. Emissions Unit # Anticipated Compliance Date

N/A

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.

MARYLAND DEPARTMENT OF THE ENVIRONMENT AIR AND RADIATION ADMINISTRATION
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III. 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) _____ 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) _____ Stationary internal combustion engines with less than 1,000 brake horsepower (746 kilowatts) operating less than 2000 hours, and any stationary internal combustion engines with less than 500 brake horsepower (373 kilowatts);

(4) X Space heaters utilizing direct heat transfer and used solely for comfort heat;

(5) X 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. 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, planning, spindle sanding, or disc sanding of wood or wood products;

(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) ___X_____ 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. 30 Storage of lubricating oils;

e) No. 13 Unheated storage of VOC with an initial boiling point of 300 °F;

f) No. __ 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. ___ 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 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) ___X_____ 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) ___X_____ 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) X 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;

(28) _____ Natural draft hoods or natural draft ventilators that exhaust air pollutants into the ambient air from manufacturing/industrial or commercial processes;

(29) X Laboratory fume hoods and vents;

(30) No. _____ Sheet- fed letter or lithographic printing press(es) with a cylinder width of less than 18 inches;

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RENEWAL TITLE V APPLICATION INSIGNIFICANT ACTIVITIES LIST

For the following, attach additional pages as necessary:

(31) __X__ 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):

General Category	Description	CH nos.
Misc	Bag Dump Stations	0
Shaping	FM Line	45159
Shaping	Heat treat exhausts w/IK dip	65128
Shaping	Tenter for wet tapes	2180
Forming	R&D ACIS	62347
Forming	R&D Jenny	62924
*Drying	COAG Oven	0

(32) X any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act (list and describe):

General Category	Description	CH nos.
Conditioning	Pellet Oven	74820
Conditioning	Pellet Oven	1551361
Conditioning	Pellet Oven	2166
Conditioning	Pellet Oven	2413
Conditioning	Pellet Oven	2443
Conditioning	Pellet Oven	2444
Conditioning	Pellet Oven	2445
Drying	Lab Ovens	963
Drying	Lab Ovens	2211
Forming	Mixing and Compounding	1931985
Misc	Chem storage cabinets	0
Misc	Paint Booth	5800
Misc	Slitter	1058
Misc	Welding Hood	0
*Misc.	Gas Fired Heater, 60 MBH	0
*Misc.	Gas Fired Heater, 60 MBH	0
*Misc.	Gas Fired Heater, 60 MBH	0
Shaping	Calendaring line	244
Shaping	Calendaring line	825
Shaping	Calendaring line	1367
Shaping	Calendaring line	1368
Shaping	Calendaring line	1693
Shaping	Calendaring line	2055
Shaping	Calendaring line	74770
Shaping	Calendaring line	1342
Shaping	Calendaring line	2149
Shaping	Calendaring line	2555
Shaping	Calendaring w/dip	242
Shaping	Calendaring w/dip	75616
Shaping	Calendaring line	126
Shaping	Heat treat exhaust	62933
Shaping	Heat treat exhaust	74794
Shaping	Heat treat exhaust	853
Shaping	Heat treat exhaust	982
Shaping	Heat treat exhaust	1425
Shaping	Heat treat exhaust	1761
Shaping	Heat treat exhaust	2344
Shaping	Heat treat exhaust	61670
Shaping	Heat treat exhaust	1504863
Shaping	Heat treat exhaust	2310
Shaping	Heat treat exhaust	6044
Shaping	Heat treat exhaust	20015459

Shaping	Heat treat exhaust	20043397
Shaping	Heat treat exhaust	20043398

*denotes new since last permit

COMPLIANCE ASSURANCE MONITORING (CAM)
Thermal Oxidation for Control of VOC

I. Background

A. Emissions Unit

Description: Process dryers and ovens

Identification: EU3-2

Facility: W.L. Gore & Associates - Cherry Hill Site

B. Applicable Regulation, Emissions Limit, and Monitoring Requirements

Regulation: Code of Maryland Regulations (COMAR) 26.11.19.30

Emissions Limits: Reduce VOC emissions by 85 percent or more

Monitoring Requirements: Continuous temperature monitor to record oxidizer temperature

C. Control Technology:

Oxidizer Control System (OCS) consisting of the following:

- Regenerative Thermal Oxidizer #1 (SARA, CH62581)
- Regenerative Thermal Oxidizer #2 (TEC, CH2369)
- Regenerative Thermal Oxidizer #3 (WILLIE, CH60535)
- Afterburner (FRANKY, CH20047178)

The OCS consists of three Regenerative Thermal Oxidizers (Willie, Sara, and Tec), and one Afterburner (Franky).

Willie and Sara run during normal operation and Tec is installed as a backup oxidizer, for failures of the primary Willie and Sara oxidizers or during maintenance activities. Tec will also come online to help dissipate accumulated heat from high solvent loading at Willie and Sara oxidizers. The oxidizers and the ovens are connected together such that any oven can discharge into any one of the three oxidizers. This is accomplished by the use of a common manifold, where the process exhausts will be mixed. During normal running conditions, Willie and Sara are online and taking process exhaust gas, while the Tec oxidizer is offline. Tec is used during emergency situations, and as backup when maintenance is required on Willie or Sara. Since we operate batch processes, the OCS is a more efficient use of the oxidizers. Fuel usage is decreased, reducing combustion emissions, and VOC load is maximized, increasing the destruction efficiency of the oxidizers.

Franky is installed on an R&D line, John Bonham Dryer. Emissions from this dryer are controlled by either the existing site OCS or the Franky Afterburner. Flow direction is controlled by the site OCS and recipe at the process dryer.

II. Monitoring Approach

The key elements of the monitoring approach include the indicators to be monitored, indicator ranges, and performance criteria and are presented in the following table.

I. Indicator	**Combustion Zone Temperature**	**Visible Emissions**	**Stack Testing**
II. Measurement Approach	The combustion zone temperature is measured using thermocouples that are located within the combustion zone.	Periodic observations of the OCS stack can indicate if visible emissions are present.	VOC Emissions are sampled using EPA Reference Method 25A, a continuous extractive sample. (40 CFR 60 Appendix A)
III. Indicator Range	An excursion occurs when the combustion zone temperature drops below 1400ºF, or other temperature approved by the Department, while processes are venting to the oxidizer. Audible and visual alarms will alert oxidizer operators of any excursions and the oxidizer will automatically remove the permissive to operate from all users prior to the temperature reaching setpoint. An excursion will trigger an investigation and corrective action, and if lasting longer than one hour, a reporting requirement.	Quarterly observations are performed for a 6-minute period, while process lines are in operation and being controlled by the OCS or Afterburner.	Stack Test must show a destruction efficiency of 85 percent or greater.
IV. Performance Criteria			
A. Data Representativeness	The combustion zone temperatures are measured using thermocouples located within the combustion zone. The minimum accuracy of the thermocouple is ± 2 degrees C.	A Method-9-like visible emissions observation is performed.	See EPA Reference Method 25A
B. Verification of Operational Status	N/A	N/A	See EPA Reference Method 25A
C. QA/QC Practices and Criteria	Annual replacement of the combustion zone thermocouples.	N/A	See EPA Reference Method 25A
D. Monitoring Frequency	The combustion zone temperature is monitored continuously.	Quarterly observations	The stack test is performed within 180 days of startup of unit and once during each permit cycle
E. Data Collection Procedures	Temperatures are recorded to a digital chart recorder. The data is saved locally on a storage card and is also saved on network servers.	The 6-minute observation shall be documented and maintained for a period of at least 5 years.	See EPA Reference Method 25A, the results are reported to the permitting authority.
F. Averaging Period	6 minute average	N/A	N/A

III. Justification

A. Background

The pollutant specific emissions units (PSEU) consist of dryers and ovens that support the fluoropolymer material shaping and forming processes. The dryers and ovens are controlled by the Oxidizer Control System (OCS) which consists of three regenerative thermal oxidizers (RTO) and one afterburner.

The dryers and ovens are used to drive off liquid (VOC and/or water) from fluoropolymer materials or to add certain properties to the product. The dryers and ovens are ducted to the OCS and operate as a batch process on an as needed basis depending on production demands. All of the dryers and ovens are interlocked with the OCS so that they can only operate when the OCS is at temperatures greater than 1400ºF or other temperature approved by the Department. If temperatures approach 1400ºF (or other approved temperature), the alarm system will alert operators of low temperatures and if the low temperature is not corrected the OCS will go offline and production equipment will automatically be shutdown.

B. Rationale for election of Performance Indicators

The OCS is used to reduce VOC emissions generated from the evolution of VOCs from fluoropolymer materials.

"VOC destruction efficiency depends upon design criteria (i.e., chamber temperature, residence time, inlet VOC concentration, compound type, and degree of mixing. Thermal destruction of most organic compounds occurs between 590ºC and 650ºC (1100ºF and 1200ºF)." (EPA-COCA Fact Sheet: Thermal Incinerator)

Manufacturer Design Criteria

OCS components	Maximum gas flow rate inlet	VOC Destruction
Oxidizer #1 (SARA)	25,000 scfm	95 to 98%
Oxidizer #2 (TEC)	25,000 scfm	95 to 98%
Oxidizer #3 (WILLIE)	30,000 scfm	95 to 98%
Afterburner (FRANKY)	1,000 scfm	99%

The RTOs and Afterburner utilize the opening and closing of dampers to routinely change the direction of air flow over the beds. This change of air-flow direction helps to improve mixing of the gases and maintains uniform temperatures across the beds. Incomplete combustion in the RTO and Afterburner may be indicated by visible emissions from the stack.

In accordance with 40 CFR 64.4(b)(1), presumptively acceptable monitoring includes: "Presumptively acceptable or required monitoring approaches, established by the permitting authority in a rule that constitutes part of the applicable implementation plan

required pursuant to Title I of the Act, that are designed to achieve compliance with this part for particular pollutant-specific emissions units."

COMAR 26.11.19 achieves the requirements of Title I of the Clean Air Act, Section 110. State Implementation Plan (SIP) for VOC and requires the following for this source:

COMAR 26.11.19.30E

"(1) A person who owns or operates a FPM process installation that has actual uncontrolled VOC emissions of 50 pounds or more per day shall vent the emissions into a thermal oxidizer system or other control method approved by the Department to destroy or reduce VOC emissions by 85 percent or more, overall.

(2) If a thermal oxidizer is installed, the oxidizer combustion chamber shall be:

- *a) Operated at a minimum combustion chamber temperature of 1400°F or other temperature approved by the Department that is demonstrated to achieve compliance with this regulation;*
- *b) Equipped with a continuous temperature monitor to record oxidizer temperature; and*
- *c) Equipped with an alarm system that alerts the operator when the oxidizer combustion chamber temperature is less than the approved temperature; and*
- *d) Equipped with an interlock system that prevents operation of the FPM installation unless the approved control system is operating.*

(3) If a source uses an alternative control method approved by the Department, the alternative control method shall be monitored as required by the Department.

(4) Equipment that is installed for the purpose of treating emissions or monitoring shall be operated, maintained, and as applicable, calibrated in accordance with the equipment vendor's specifications.

(5) *A person who owns or operates a FPM compounding and tape or shape-forming installation shall minimize fugitive emission of VOC by:*

- *(a) Immediately enclosing all wet FPM during storage; and*
- *(b) Covering dipping troughs when not in operation."*

COMAR 26.11.19.30F

F. "Demonstration of Compliance. Compliance with this regulation shall be demonstrated using the applicable VOC test methods specified in COMAR 26.11.01.04C or other test method approved by the Department."

C. Rationale for Selection of Indicator Ranges

Indicator ranges are based on requirements of the Maryland regulation and are supported by stack testing data. VOC destruction of most organic compounds occurs between 1100ºF and 1200ºF. Results of the most recent stack tests are listed in the table below. Since TEC is used as a backup unit, it is not regularly tested; however, it was tested in 2022 and is on a regular preventative maintenance schedule just like the other units.

Test methods used to determine VOC destruction efficiency includes EPA Test Method 25A.

Stack Test Data

	Date of Compliance Demonstration	Combustion Temperature	Destruction Efficiency (average of 3 runs)
SARA, Oxidizer #1	8/24/2021	1320º F	99.20%
TEC, Oxidizer #2	3/1/2022	1430º F	95.80 %
Willie, Oxidizer #3	8/24/2021	1600ºF	98.57 %
Franky, Afterburner	2/17/2021	1400ºF	99.9%

STATE-ONLY ENFORCEABLE REQUIREMENTS

Facility Information:

Name of Facility: **W.L. Gore & Associates, Inc. – Cherry Hill Plant**

County: **Cecil**

Premises Number:
24-015-00079

Street Address:
2401 Singerly Road, Elkton, MD 21921

24-hour Emergency Telephone Number for Air Pollution Matters:
443-566-2545

Type of Equipment (List Significant Units):

Facility-wide

- **Nuisance**
- **Odors**
- **Control Technology Requirements**
- **Ambient Impact Requirement**

CITATION TO AND DESCRIPTION OF APPLICABLE STATEONLY ENFORCEABLE REQUIREMENTS

Registration No.: Facility-wide

Emissions Unit No.: Facility-wide **General Reference:** COMAR 26.11.06.08

Briefly describe the requirement and the emissions limit (if applicable):

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."

Methods used to demonstrate compliance:

Any installation or premises is not operated or maintained in such a manner that a nuisance or air pollution is created.

CITATION TO AND DESCRIPTION OF APPLICABLE STATEONLY ENFORCEABLE REQUIREMENTS

Registration No.: Facility-wide

Emissions Unit No.: Facility-wide **General Reference:** COMAR 26.11.06.09

Briefly describe the requirement and the emissions limit (if applicable):

A. 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."

Methods used to demonstrate compliance:

Any installation or premises is not operated or maintained in such a manner that a nuisance or air pollution is created.

CITATION TO AND DESCRIPTION OF APPLICABLE STATEONLY ENFORCEABLE REQUIREMENTS

Registration No.: Facility-wide

Emissions Unit No.: Facility-wide **General Reference:** COMAR 26.11.15.05

Briefly describe the requirement and the emissions limit (if applicable):

Control Technology Requirements

"A. New or Reconstructed Installations. A person may not construct, reconstruct, operate, or cause to be constructed, reconstructed, or operated, any new installation or source that will discharge a toxic air pollutant to the atmosphere without installing and operating T-BACT."

Methods used to demonstrate compliance:

Any new or reconstructed installation will be evaluated to ensure that there is no discharge of toxic air pollutant to the atmosphere without the installation and operation of T-BACT.

CITATION TO AND DESCRIPTION OF APPLICABLE STATEONLY ENFORCEABLE REQUIREMENTS

Registration No.: Facility-wide

Emissions Unit No.: Facility-wide **General Reference:** COMAR 26.11.15.06

Briefly describe the requirement and the emissions limit (if applicable):

Ambient Impact Requirements

A. Requirements for New Installations, Sources, or Premises.

(1) Except as provided in §A(2) of this regulation, a person may not construct, modify, or operate, or cause to be constructed, reconstructed, or operated, any new installation or source without first demonstrating to the satisfaction of the Department using procedures established in this chapter that total allowable emission from the premises of each toxic air pollutant discharge by the new installation or source will not unreasonably endanger human health.

(2) If a new installation or source will discharge a TAP that is not listed in COMAR 26.11.16.07 and will be part of an existing premises, then emissions of that TAP from existing sources or existing installations on the premises may be omitted from a screening analysis unless the TAP is added to COMAR 26.11.16.07.

Methods used to demonstrate compliance:

Any new or reconstructed installation will demonstrate that the total allowable site emissions of each TAP will not unreasonably endanger human health.

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

(✓) Name and address of owner or operator, including telephone number.

(✓) Name and address of facility, including the plant manager's name and telephone number.

(✓) A 24-hour emergency telephone number for air pollution matters.

Section 1 CERTIFICATION STATEMENTS

(✓) The certification statement completed and signed by a responsible official.

Section 2 FACILITY DESCRIPTION SUMMARY

(✓) A brief description of each of the source's process(es), including all applicable SIC codes and end products.

(✓) Flow diagrams indicating all emissions units, emission points, and control devices.

(✓) A plot plan of the entire facility.

(✓) Emission Certification Report.

(✓) General Emissions Information.

Section 3 EMISSIONS UNIT DESCRIPTIONS –

This section must be completed for each emissions unit.

Part A

(✓) Emissions unit number.

(✓) Detailed description of unit, including all emission points.

(✓) Federally enforceable limit(s) on the operating schedule.

MARYLAND DEPARTMENT OF THE ENVIRONMENT
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RENEWAL TITLE V APPLICATION CHECKLIST

(✓) Fuel consumption information for <u>any</u> emissions unit that consumes fuel including the type of fuel, percent sulfur, and annual usage of fuel.

Part B

(✓) A citation and description of each federally enforceable requirement, including all emission standards, for each emissions unit.

(✓) A statement of compliance demonstration techniques for each requirement, including a description of monitoring, record keeping, reporting requirements, and test methods.

(✓) The frequency of submittal of the compliance demonstration during the permit term.

Part C

(✓) Emissions unit number.

(✓) Permit to construct number.

(✓) Emissions point number(s).

(✓) Date(s) the permit to construct was issued.

(✓) Condition number(s) as indicated on the permit to construct.

(✓) Description of the permit condition(s) and the reason(s) why they are believed to be obsolete, extraneous, or insignificant.

Part D - Not Applicable

( ) Description of all alternate operating scenarios that apply to an emissions unit.

( ) Number assigned to each scenario.

( ) Emissions unit number.

( ) 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 – Not Applicable

( ) A citation and description of each federally enforceable requirement triggered by an operating scenario, including all emission standards, for each emissions unit.

( ) 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.

( ) A statement of compliance demonstration techniques for each requirement, including a description of monitoring, record keeping, reporting requirements, and test methods.

( ) The frequency of submittal of the compliance demonstration during the permit term.

Section 4 CONTROL EQUIPMENT

(✓) The type of each piece of air pollution control equipment

(✓) The capture and control efficiencies of the control equipment.

Section 5 SUMMARY SHEET OF POTENTIAL EMISSIONS – Not Applicable

( ) Quantity of potential emissions for criteria pollutants and HAPs emitted in tons per year for each emissions unit.

( ) Fugitive emission estimations for the entire facility for criteria pollutants and HAPs emitted in tons per year.

( ) Basis for all emission calculations.

Section 6 AN EXPLANATION OF PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS – Not Applicable

( ) An explanation of the proposed exemption.

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Section 7 COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS - Not Applicable

( ) Identification of emissions unit(s) not in compliance, including the requirement being violated and the effective compliance date.

( ) Detailed description of methods to be used to achieve compliance.

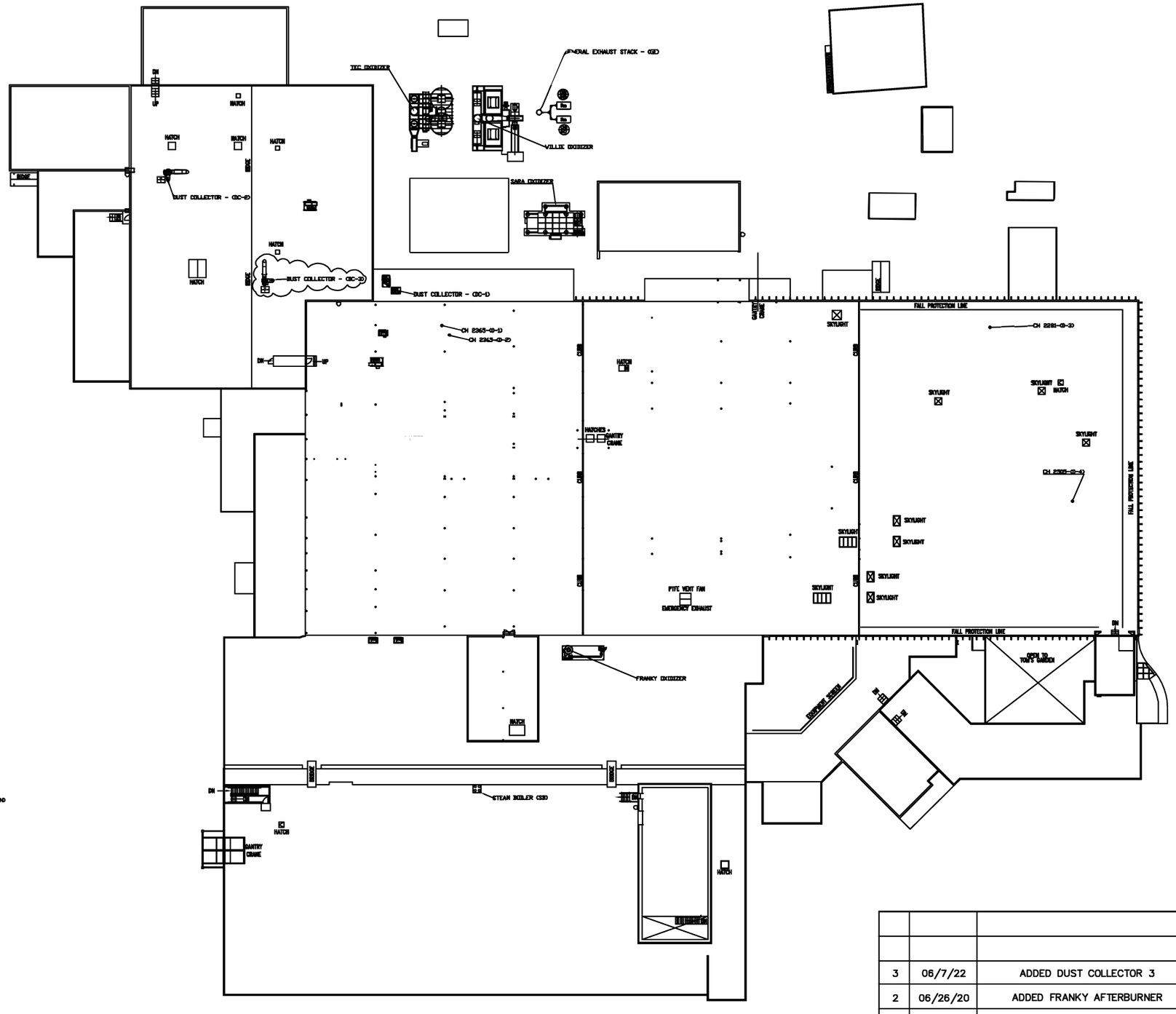
( ) A schedule of remedial measures, including an enforceable sequence of actions with milestones.

Attachment

(√) Checklist of Insignificant Activities

(√) CAM Plan (If Applicable)

Appendix A – Drawings



REV	DATE	DESCRIPTION	BY
3	06/7/22	ADDED DUST COLLECTOR 3	BJD
2	06/26/20	ADDED FRANKY AFTERBURNER	BJD
1	04/23/18	ADDED DC-2 POINT OF EMISSION	IZ
0	6/14/17	INITIAL RELEASE	XX

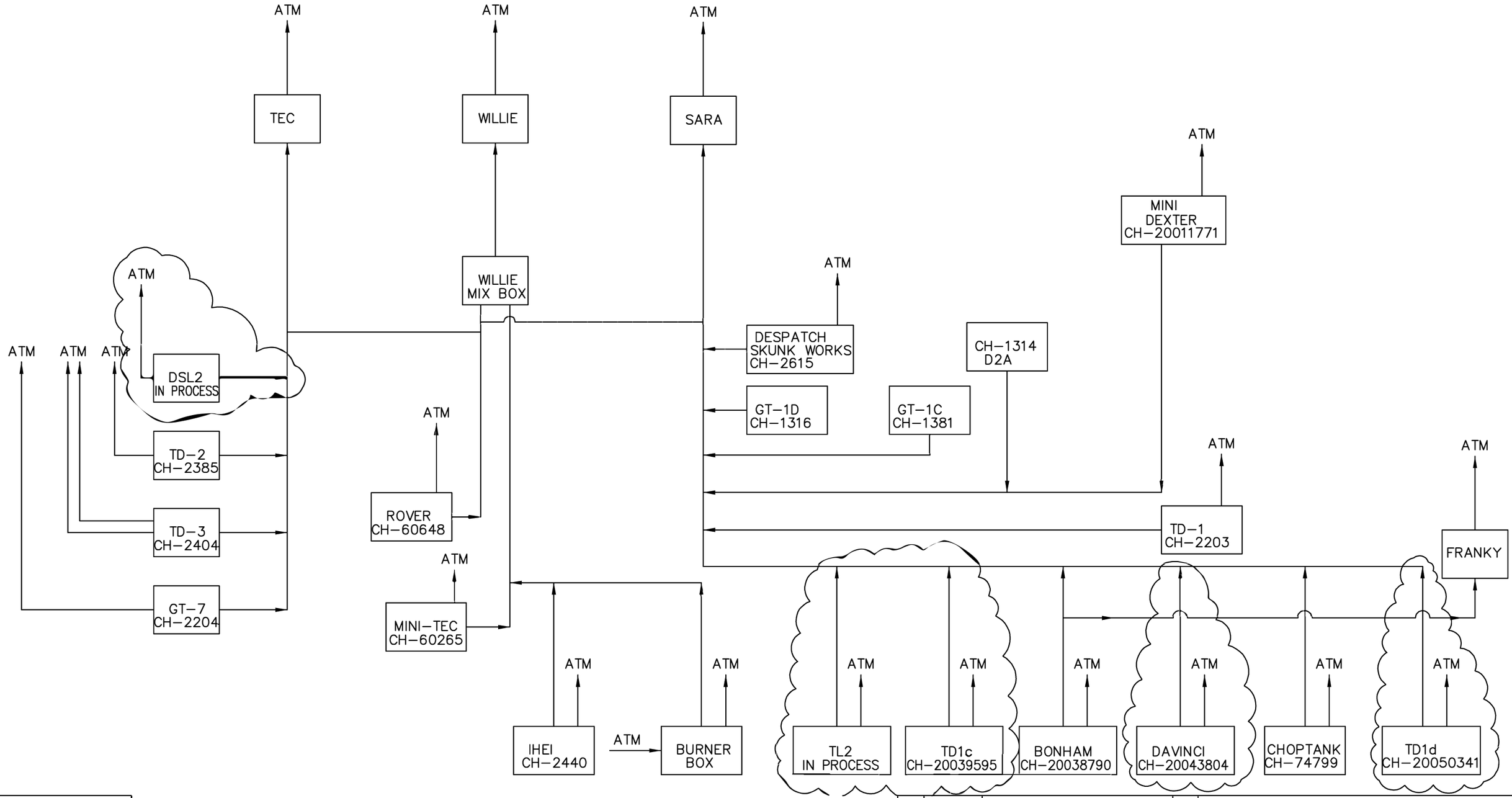
FILE LOCATION: W:\NONDIV\LO1\FAC\04 EH&S DWGS

GORE Creative Technologies Worldwide

W. L. GORE & ASSOCIATES, INC.
CHERRY HILL
ELKTON, MARYLAND

SITE PLAN
WITH EXHAUST POINTS

	SHT:	DWG:	REV:
B	1 OF 1	CHST-SK-503	3



REV	DATE	DESCRIPTION	BY
3	6/7/22	ADDED DSL2, TL2, TD1d, DAVINCI, TD1c, DELETED BURNER BOX, CH–1632, CH–24391	BJD
2	6/25/20	ADDED FRANKY THERMAL OXIDIZER	BJD
0	6/14/17	INITIAL RELEASE	BJD

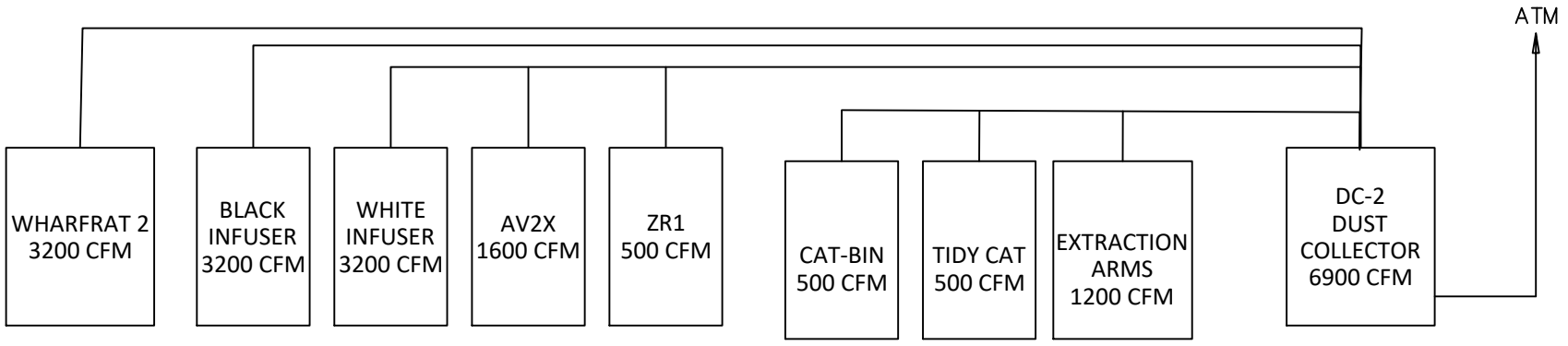
FILE LOCATION: W:\NONDIV\EQUIP\FAC\04 EH&S DWGS

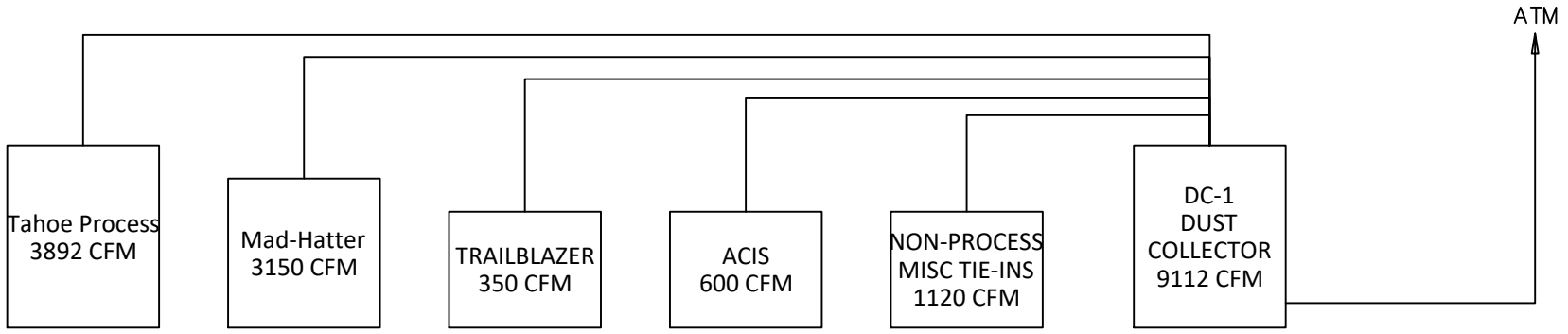
GORE
Creative Technologies Worldwide

W. L. GORE & ASSOCIATES, INC.
CHERRY HILL SITE
ELKTON, MARYLAND

CHERRY HILL OXIDIZER CONTROL SYSTEM

	SHT:	DWG:	REV:
B	1 OF 1	CHST–SK–0502	3





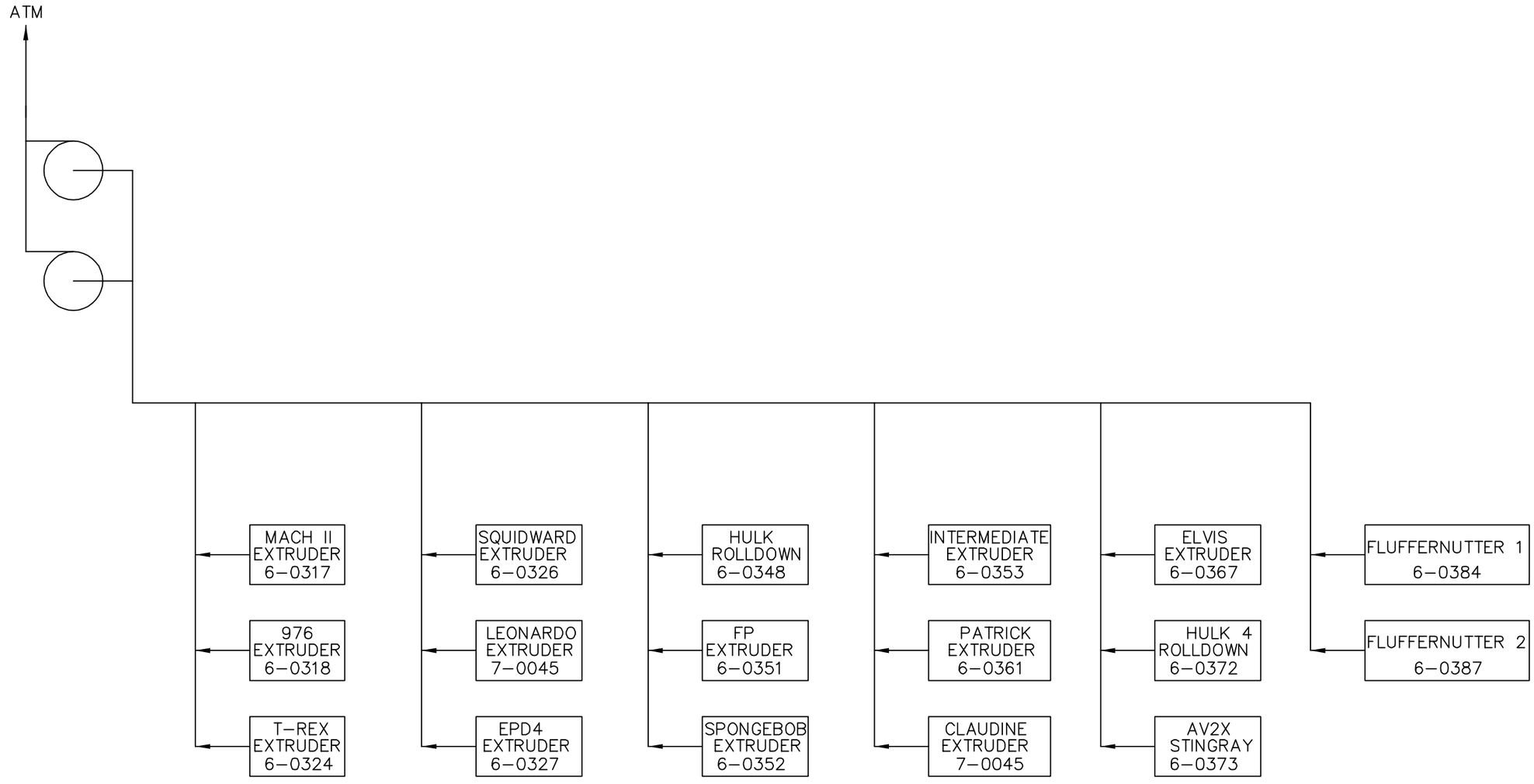
REV.	DATE	DESCRIPTION	BY
2	2022	ADDED WHARFRAT 1&2, AV2X, ZR1, TIDY CAT,EXTRACTION ARMS, DC-3	IZ
1	2018	RE-RELEASE OF SYSTEM PFD	IZ

DRAWN BY: ISRAEL ILUFOYE | DATE: 3/20/2018
CHECKED BY: | SCALE: NONE
APPROVED BY: | FILE:
FILE LOCATION: W:\NONDIV\Equip\FAC\04 EHS DWGs | SHEET: 1 OF 1

W. L. GORE & ASSOCIATES, INC.
CHERRY HILL SITE
FACILITY GROUP
ELKTON, MARYLAND

CHERRY HILL
DUST COLLECTION SYSTEM
EH&S PFD

SIZE D | DWG: EHS-4 | REV. # 1



REV	DATE	DESCRIPTION	BY
1	6/7/22	ADDED ELVIS, HULK 4, FLUFFERNUTTER 1&2, AV2X STINGRAY	BJD
0	6/26/17	INITIAL RELEASE	BJD

FILE LOCATION:W: \NONDIV\EQUIP\FAC\04 EH&S DWGS

GORE Creative Technologies Worldwide

W. L. GORE & ASSOCIATES, INC.

CHERRY HILL SITE
ELKTON, MARYLAND

CHERRY HILL
GENERAL EXHAUST

B	SHT: 1 OF 1	DWG: CHST-SK-0504	REV: 1

Appendix B –
2021 Emission Certification Report
2021 Compliance Certification Report

Cover Page for MDE Emission Certification Report **Calendar Year: 2021**

Requirements

* Attach all supporting calculations
* Form 1 (Facility Information and Contact Info) is not included in this spreadsheet and should be filled out separately
* Enter facility info on the "Equipment Inventory" tab and it will autofill to the rest of the worksheets
* Enter full MDE registration numbers for all equipment

Tips for working in Excel

* Cells with a red triangle in the top right have additional information that will show if you hover over the cell ↗
* Alt + Enter goes to the next line in a cell
* Need more space for additional equipment? Add as many rows as needed. Hover over the row number, right click, and insert.
* Copying and pasting from another document? Select "match destination formatting" under paste options to preserve aesthetics.
* Changing Print Area
  (1) Highlight all the cells you want to print, then go to Page Layout >> Print Area >> Set Print Area
  (2) First, press the following keys sequentially: ALT, W, I. Next, drag the solid blue lines to change print area.

Emission Estimation Methods

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

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 or 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

Definitions

(S / F)

S - Stack Emissions, F - Fugitive 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 needs to be completed only for VOC and NOx sources.

Fuel

Type: Designation of a fuel. (e.g., No. 2, No. 6, NG = natural gas)
Amount: Quantity of fuel consumed over the calendar year
Units: Dimensional units in which the above amount of fuel was measured, assumed to be on an annual basis (e.g., gal ≈ gal/yr)
If more than one fuel is used, calculate and list emissions separately for each fuel

Fuel definitions (assumed on an annual basis)

For each fuel source	enter this abbreviation
Natural Gas	NG
No. 2 Fuel Oil	No. 2
… (repeat for # 3-5)	…
No. 6 Fuel Oil	No. 6
Coal	Coal
Coke	Coke
Landfill Gas	LFG
Liquefied Petroleum Gas	LPG
Methane	Methane
Propane	Propane
Biogas	Biogas
Other	Other

Unit definitions (assumed on an annual basis)

For each unit	enter this abbreviation
Gallons	gal
Million cubic feet	mmcf
Thousand cubic feet	mcf
Hundred cubic feet	ccf
Cubic feet	cf
British Thermal Unit	Btu
Million BTU	MMBtu
Gigajoule	GJ
Megajoule	MJ
Decatherm	Dth
Kilowatt hour	KWh
Megawatt hour	MWh

EQUIPMENT INVENTORY
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Equipment Inventory

Equipment Name	Registration No.	S / F	Fuel			Throughput		Actual Operating Schedule			Estimation Methods
			Type	Amount	Units	Amount	Units	hrs/day	days/wk	days/yr	
Boiler #1B Burn. 9.45 MBTU	4-0223	S	NG	21.02	mmscf			24	7	208	C3
Boiler #2B Burn. 9.45 MBTU	4-0224	S	NG	20.11	mmscf			24	7	169	C3
Boiler #3B Burn. 10.4MBTU	5-0149	S	NG	19.08	mmscf			24	7	173	C3
FP Process Area	6-0041	S						8	1	101	C1,C2,C4
FP Process Area	6-0041	F						8	1	101	C1,C2,C4
Oven CH2203	6-0102	S	NG	3.98	mmscf			16	6	217	C1,C2,C4
Oven CH2203	6-0102	F	NG					16	6	217	C1,C2,C4
FP Process Area	6-0104	S						16	7	359	C1,C2,C4
FP Process Area	6-0104	F						16	7	359	C1,C2,C4
Oven CH2383	6-0126	S	NG	2.67	mmscf			15	5	223	C1,C2,C4
Oven CH2383	6-0126	F	NG					15	5	223	C1,C2,C4
Ovens	6-0130	S						8	4	17	C1,C2,C4
Ovens	6-0130	F						8	4	17	C1,C2,C4
Oven CH2204	6-0131	S	NG	32.37	mmscf			16	1	355	C1,C2,C4
Oven CH2204	6-0131	F	NG					16	1	355	C1,C2,C4
Paint Spray Booth	6-0162	S						1	1	182	C1,C2,C4
Ovens	6-0173	S	NG	47.23	mmscf			8	1	359	C1,C2,C4
Ovens	6-0173	F	NG					8	1	359	C1,C2,C4
Dryer CH1316	6-0260	S						16	6	240	C1,C2,C4
Dryer CH1316	6-0260	F						16	6	240	C1,C2,C4
Dryer CH1899969	6-0275	S						8	2	265	C1,C2,C4

EQUIPMENT INVENTORY
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Equipment Inventory

Equipment Name	Registration No.	S / F	Fuel			Throughput		Actual Operating Schedule			Estimation Methods
			Type	Amount	Units	Amount	Units	hrs/day	days/wk	days/yr	
Dryer CH1899969	6-0275	F						8	2	265	C1,C2,C4
Dryer CH2404	6-0276	S	NG	7.58	mmscf			16	7	335	C1,C2,C4
Dryer CH2404	6-0276	F	NG					16	7	335	C1,C2,C4
Dryer CH60648	6-0278	S	NG	5.42	mmscf			16	5	243	C1,C2,C4
Dryer CH60648	6-0278	F	NG					16	5	243	C1,C2,C4
Dryer CH2615	6-0279	S						8	1	8	C1,C2,C4
Dryer CH2615	6-0279	F						8	1	8	C1,C2,C4
Dryer 60265	6-0311	S	NG	1.27	mmscf			12	1	18	C1,C2,C4
Dryer 60265	6-0311	F	NG					12	1	18	C1,C2,C4
Extruder 20000806	6-0317	S						20	7	276	C1,C2,C4
Extruder 20000806	6-0317	F						20	7	276	C1,C2,C4
Extruder CH 0976	6-0318	S						20	7	140	C1,C2,C4
Extruder CH 0976	6-0318	F						20	7	140	C1,C2,C4
Extruder CH 2101	6-0324	S						8	4	246	C1,C2,C4
Extruder CH 2101	6-0324	F						8	4	246	C1,C2,C4
Extruder CH 74818	6-0326	S						8	1	244	C1,C2,C4
Extruder CH 74818	6-0326	F						8	1	244	C1,C2,C4
Extruder CH 2371	6-0327	S						16	3	221	C1,C2,C4
Extruder CH 2371	6-0327	F						16	3	221	C1,C2,C4
Mad Cow (inc. w/ 6-0104)	6-0328	S						16	7	142	C1,C2,C4
Mad Cow (inc. w/ 6-0104)	6-0328	F						16	7	142	C1,C2,C4

EQUIPMENT INVENTORY
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Equipment Inventory

Equipment Name	Registration No.	S / F	Fuel			Throughput		Actual Operating Schedule			Estimation Methods
			Type	Amount	Units	Amount	Units	hrs/day	days/wk	days/yr	
Hulk Rolldown	6-0348	S						16	7	209	C1,C2,C4
Hulk Rolldown	6-0348	F						16	7	209	C1,C2,C4
Extruder CH-2262	6-0351	S						20	7	131	C1,C2,C4
Extruder CH-2262	6-0351	F						20	7	131	C1,C2,C4
Extruder CH#13831	6-0352	S						3	2	14	C1,C2,C4
Extruder CH#13831	6-0352	F						3	2	14	C1,C2,C4
Extruder CH#2013	6-0353	S						8	3	19	C1,C2,C4
Extruder CH#2013	6-0353	F						8	3	19	C1,C2,C4
Extruder Patrick	6-0361	S						4	1	0	C1,C2,C4
Extruder Patrick	6-0361	F						4	1	0	C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	S						4	1	26	C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	F						4	1	26	C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	S	NG	0.66	mmscf			4	1	26	C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	F	NG					4	1	26	C1,C2,C4
TD1C	6-0365	S	NG	4.88	mmscf			16	6	223	C1,C2,C4
TD1C	6-0365	F	NG					16	6	223	C1,C2,C4
Extruder Elvis	6-0367	S						4	1	30	C1,C2,C4
Extruder Elvis	6-0367	F						4	1	30	C1,C2,C4
Hulk 4	6-0372	S						16	7	127	C1,C2,C4
Hulk 4	6-0372	F						16	7	127	C1,C2,C4
Stingray Mixer	6-0373	S						8	4	67	C1,C2,C4

EQUIPMENT INVENTORY
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Equipment Inventory

Equipment Name	Registration No.	S / F	Fuel			Throughput		Actual Operating Schedule			Estimation Methods
			Type	Amount	Units	Amount	Units	hrs/day	days/wk	days/yr	
Stingray Mixer	6-0373	F						8	4	67	C1,C2,C4
Davinci	6-0381	S						0	0	0	C1,C2,C4
Davinci	6-0381	F						0	0	0	C1,C2,C4
Fluffernutter 1	6-0384	S						8	1	88	C1,C2,C4
Fluffernutter 1	6-0384	F						8	1	88	C1,C2,C4
Wharf Rat 2	6-0385	S						0	0	0	C1,C2,C4
Wharf Rat 2	6-0385	F						0	0	0	C1,C2,C4
Fluffernutter 2	6-0387	S						0	0	0	C1,C2,C4
Fluffernutter 2	6-0387	F						0	0	0	C1,C2,C4
Wharf Rat 1	6-0390	S						8	1	60	C1,C2,C4
Wharf Rat 1	6-0390	F						8	1	60	C1,C2,C4
TD1D	6-0396	S						0	0	0	C1,C2,C4
TD1D	6-0396	F						0	0	0	C1,C2,C4
extruders & ovens	7-0045	S	NG	1.62	mmscf			8	7	290	C1,C2,C4
extruders & ovens	7-0045	F	NG					8	7	290	C1,C2,C4
Emergency Generator	9-0169	S	Diesel	114.30	gal			1	1	12	C3
Dryer 20011771	9-0325	S						16	7	122	C1,C2,C4
Dryer 20011771	9-0325	F						16	7	122	C1,C2,C4
Total Usage			NG	167.88	mmscf						

CRITERIA POLLUTANTS
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Criteria Pollutants

Equipment Name	Registration No.	S / F	Fuel Type	VOC		(TOSD)	NOx		(TOSD)	SOx		CO		Lead		Estimation Methods
				tons/yr	lbs/day	lbs/day	tons/yr	lbs/day	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	
Boiler #1B Burn. 9.45 MBTU	4-0223	S	NG	5.78E-02	5.60E-01	5.60E-01	3.87E-01	3.73E+00	3.73E+00	6.30E-03	6.00E-02	8.83E-01	8.51E+00			C3
Boiler #2B Burn. 9.45 MBTU	4-0224	S	NG	5.53E-02	6.50E-01	6.50E-01	3.70E-01	4.37E+00	4.37E+00	6.00E-03	7.00E-02	8.45E-01	9.97E+00			C3
Boiler #3B Burn. 10.4MBTU	5-0149	S	NG	5.25E-02	6.10E-01	6.10E-01	3.51E-01	4.07E+00	4.07E+00	5.70E-03	7.00E-02	8.01E-01	9.28E+00			C3
FP Process Area	6-0041	S		4.27E-02	8.50E-01	8.50E-01										C1,C2,C4
FP Process Area	6-0041	F		3.00E-04	1.00E-02	1.00E-02										C1,C2,C4
Oven CH2203	6-0102	S	NG	2.28E-01	2.10E+00	2.10E+00	2.64E-01	2.43E+00	2.43E+00	1.20E-03	1.00E-02	6.08E-01	5.61E+00			C1,C2,C4
Oven CH2203	6-0102	F	NG	1.37E-01	1.27E+00	1.27E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00			C1,C2,C4
FP Process Area	6-0104	S		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
FP Process Area	6-0104	F		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Oven CH2383	6-0126	S	NG	1.72E-01	1.54E+00	1.54E+00	1.77E-01	1.59E+00	1.59E+00	8.00E-04	1.00E-02	4.09E-01	3.67E+00			C1,C2,C4
Oven CH2383	6-0126	F	NG	1.04E-01	9.30E-01	9.30E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00			C1,C2,C4
Ovens	6-0130	S		4.60E-03	5.40E-01	5.40E-01										C1,C2,C4
Ovens	6-0130	F		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Oven CH2204	6-0131	S	NG	9.03E-02	5.10E-01	5.10E-01	2.15E+00	1.21E+01	1.21E+01	9.70E-03	5.00E-02	4.95E+00	2.79E+01			C1,C2,C4
Oven CH2204	6-0131	F	NG	8.00E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00			C1,C2,C4
Paint Spray Booth	6-0162	S		7.80E-03	9.00E-02	9.00E-02										C1,C2,C4
Ovens	6-0173	S	NG	1.30E-01	7.20E-01	7.20E-01	3.13E+00	1.74E+01	1.74E+01	1.42E-02	8.00E-02	7.23E+00	4.03E+01			C1,C2,C4
Ovens	6-0173	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00			C1,C2,C4
Dryer CH1316	6-0260	S		1.32E+00	1.10E+01	1.10E+01										C1,C2,C4
Dryer CH1316	6-0260	F		6.83E-01	5.70E+00	5.70E+00										C1,C2,C4
Dryer CH1899969	6-0275	S		6.23E-01	4.70E+00	4.70E+00										C1,C2,C4
Dryer CH1899969	6-0275	F		3.23E-01	2.44E+00	2.44E+00										C1,C2,C4
Dryer CH2404	6-0276	S	NG	2.48E+00	1.48E+01	1.48E+01	5.03E-01	3.00E+00	3.00E+00	2.30E-03	1.00E-02	1.16E+00	6.92E+00			C1,C2,C4

CRITERIA POLLUTANTS
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Criteria Pollutants

Equipment Name	Registration No.	S / F	Fuel Type	VOC		(TOSD)	NOx		(TOSD)	SOx		CO		Lead		Estimation Methods
				tons/yr	lbs/day	lbs/day	tons/yr	lbs/day	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	
Dryer CH2404	6-0276	F	NG	1.55E+00	9.27E+00	9.27E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00			C1,C2,C4
Dryer CH60648	6-0278	S	NG	6.55E-01	5.39E+00	5.39E+00	3.59E-01	2.96E+00	2.96E+00	1.60E-03	1.00E-02	8.29E-01	6.82E+00			C1,C2,C4
Dryer CH60648	6-0278	F	NG	4.04E-01	3.33E+00	3.33E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00			C1,C2,C4
Dryer CH2615	6-0279	S		2.50E-03	6.30E-01	6.30E-01										C1,C2,C4
Dryer CH2615	6-0279	F		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Dryer 60265	6-0311	S	NG	5.30E-03	5.90E-01	5.90E-01	8.45E-02	9.39E+00	9.39E+00	4.00E-04	4.00E-02	1.95E-01	2.17E+01			C1,C2,C4
Dryer 60265	6-0311	F	NG	1.10E-03	1.20E-01	1.20E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00			C1,C2,C4
Extruder 20000806	6-0317	S		3.39E-01	2.46E+00	2.46E+00										C1,C2,C4
Extruder 20000806	6-0317	F		1.45E-01	1.05E+00	1.05E+00										C1,C2,C4
Extruder CH 0976	6-0318	S		9.15E-02	1.31E+00	1.31E+00										C1,C2,C4
Extruder CH 0976	6-0318	F		3.92E-02	5.60E-01	5.60E-01										C1,C2,C4
Extruder CH 2101	6-0324	S		2.71E-01	2.20E+00	2.20E+00										C1,C2,C4
Extruder CH 2101	6-0324	F		1.16E-01	9.40E-01	9.40E-01										C1,C2,C4
Extruder CH 74818	6-0326	S		9.04E-02	7.40E-01	7.40E-01										C1,C2,C4
Extruder CH 74818	6-0326	F		3.88E-02	3.20E-01	3.20E-01										C1,C2,C4
Extruder CH 2371	6-0327	S		7.35E-02	6.70E-01	6.70E-01										C1,C2,C4
Extruder CH 2371	6-0327	F		3.15E-02	2.90E-01	2.90E-01										C1,C2,C4
Mad Cow (inc. w/ 6-0104)	6-0328	S		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Mad Cow (inc. w/ 6-0104)	6-0328	F		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Hulk Rolldown	6-0348	S		8.43E-02	8.10E-01	8.10E-01										C1,C2,C4
Hulk Rolldown	6-0348	F		3.61E-02	3.50E-01	3.50E-01										C1,C2,C4
Extruder CH-2262	6-0351	S		2.77E-02	4.20E-01	4.20E-01										C1,C2,C4
Extruder CH-2262	6-0351	F		1.19E-02	1.80E-01	1.80E-01										C1,C2,C4

CRITERIA POLLUTANTS
EMISSIONS CERTIFICATION REPORT

015-00079 — Facility ID
W.L. Gore & Associates, Inc. - Cherry Hill — Facility Name
Criteria Pollutants

Equipment Name	Registration No.	S / F	Fuel Type	VOC		(TOSD)	NOx		(TOSD)	SOx		CO		Lead		Estimation Methods
				tons/yr	lbs/day	lbs/day	tons/yr	lbs/day	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	
Extruder CH#13831	6-0352	S		4.00E-04	6.00E-02	6.00E-02										C1,C2,C4
Extruder CH#13831	6-0352	F		2.00E-04	3.00E-02	3.00E-02										C1,C2,C4
Extruder CH#2013	6-0353	S		5.60E-03	5.90E-01	5.90E-01										C1,C2,C4
Extruder CH#2013	6-0353	F		2.40E-03	2.50E-01	2.50E-01										C1,C2,C4
Extruder Patrick	6-0361	S		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Extruder Patrick	6-0361	F		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	S		6.10E-03	4.70E-01	4.70E-01										C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	F		3.20E-03	2.50E-01	2.50E-01										C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	S	NG	1.80E-03	1.40E-01	1.40E-01	4.36E-02	3.35E+00	3.35E+00	2.00E-04	2.00E-02	1.01E-01	7.73E+00			C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00			C1,C2,C4
TD1C	6-0365	S	NG	5.06E-01	4.54E+00	4.54E+00	3.24E-01	2.90E+00	2.90E+00	1.50E-03	1.00E-02	7.47E-01	6.70E+00			C1,C2,C4
TD1C	6-0365	F	NG	3.12E-01	2.79E+00	2.79E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00			C1,C2,C4
Extruder Elvis	6-0367	S		1.30E-03	9.00E-02	9.00E-02										C1,C2,C4
Extruder Elvis	6-0367	F		6.00E-04	4.00E-02	4.00E-02										C1,C2,C4
Hulk 4	6-0372	S		7.16E-02	1.13E+00	1.13E+00										C1,C2,C4
Hulk 4	6-0372	F		3.07E-02	4.80E-01	4.80E-01										C1,C2,C4
Stingray Mixer	6-0373	S		1.58E-01	4.73E+00	4.73E+00										C1,C2,C4
Stingray Mixer	6-0373	F		1.10E-03	3.00E-02	3.00E-02										C1,C2,C4
Davinci	6-0381	S		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Davinci	6-0381	F		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Fluffernutter 1	6-0384	S		1.29E-02	2.90E-01	2.90E-01										C1,C2,C4
Fluffernutter 1	6-0384	F		5.50E-03	1.30E-01	1.30E-01										C1,C2,C4
Wharf Rat 2	6-0385	S		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4

CRITERIA POLLUTANTS
EMISSIONS CERTIFICATION REPORT

015-00079 — Facility ID
W.L. Gore & Associates, Inc. - Cherry Hill — Facility Name
Criteria Pollutants

Equipment Name	Registration No.	S / F	Fuel Type	VOC		(TOSD)	NOx		(TOSD)	SOx		CO		Lead		Estimation Methods
				tons/yr	lbs/day	lbs/day	tons/yr	lbs/day	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	
Wharf Rat 2	6-0385	F		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Fluffernutter 2	6-0387	S		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Fluffernutter 2	6-0387	F		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Wharf Rat 1	6-0390	S		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
Wharf Rat 1	6-0390	F		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
TD1D	6-0396	S		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
TD1D	6-0396	F		0.00E+00	0.00E+00	0.00E+00										C1,C2,C4
extruders & ovens	7-0045	S	NG	1.75E+00	1.21E+01	1.21E+01	1.07E-01	7.40E-01	7.40E-01	5.00E-04	0.00E+00	2.47E-01	1.70E+00			C1,C2,C4
extruders & ovens	7-0045	F	NG	7.83E-01	5.40E+00	5.40E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00			C1,C2,C4
Emergency Generator	9-0169	S	Diesel	3.00E-04	5.00E-02	5.00E-02	1.48E-02	2.47E+00	2.47E+00	0.00E+00	0.00E+00	1.10E-03	1.80E-01			C3
Dryer 20011771	9-0325	S		1.60E-01	2.62E+00	2.62E+00										C1,C2,C4
Dryer 20011771	9-0325	F		8.29E-02	1.36E+00	1.36E+00										C1,C2,C4
Total Emissions				1.44E+01	1.18E+02	1.18E+02	8.26E+00	7.05E+01	7.05E+01	5.04E-02	4.40E-01	1.90E+01	1.57E+02	0.00E+00	0.00E+00	

PARTICULATE MATTER
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Particulate Matter (PM) Pollutant

Equipment Name	Registration No.	S / F	Fuel Type	PM - Filterable		PM 10 - Filterable		PM 2.5 - Filterable		PM - Condensable		Estimation Methods
				tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	
Boiler #1B Burn. 9.45 MBTU	4-0223	S	NG	2.00E-02	1.90E-01	2.00E-02	1.90E-01	2.00E-02	1.90E-01	5.99E-02	5.80E-01	C3
Boiler #2B Burn. 9.45 MBTU	4-0224	S	NG	1.91E-02	2.30E-01	1.91E-02	2.30E-01	1.91E-02	2.30E-01	5.73E-02	6.80E-01	C3
Boiler #3B Burn. 10.4MBTU	5-0149	S	NG	1.81E-02	2.10E-01	1.81E-02	2.10E-01	1.81E-02	2.10E-01	5.44E-02	6.30E-01	C3
FP Process Area	6-0041	S										C1,C2,C4
FP Process Area	6-0041	F										C1,C2,C4
Oven CH2203	6-0102	S	NG	3.80E-03	4.00E-02	3.80E-03	4.00E-02	3.80E-03	4.00E-02	1.13E-02	1.00E-01	C1,C2,C4
Oven CH2203	6-0102	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
FP Process Area	6-0104	S	0.00	0.00E+00	0.00E+00	2.68E-01	1.50E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
FP Process Area	6-0104	F	0.00	0.00E+00	0.00E+00	2.10E-01	1.17E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
Oven CH2383	6-0126	S	NG	2.50E-03	2.00E-02	2.50E-03	2.00E-02	2.50E-03	2.00E-02	7.60E-03	7.00E-02	C1,C2,C4
Oven CH2383	6-0126	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
Ovens	6-0130	S										C1,C2,C4
Ovens	6-0130	F										C1,C2,C4
Oven CH2204	6-0131	S	NG	3.08E-02	1.70E-01	3.08E-02	1.70E-01	3.08E-02	1.70E-01	9.23E-02	5.20E-01	C1,C2,C4
Oven CH2204	6-0131	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
Paint Spray Booth	6-0162	S										C1,C2,C4
Ovens	6-0173	S	NG	4.49E-02	2.50E-01	4.49E-02	2.50E-01	4.49E-02	2.50E-01	1.35E-01	7.50E-01	C1,C2,C4
Ovens	6-0173	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
Dryer CH1316	6-0260	S										C1,C2,C4
Dryer CH1316	6-0260	F										C1,C2,C4
Dryer CH1899969	6-0275	S										C1,C2,C4

PARTICULATE MATTER
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Particulate Matter (PM) Pollutant

Equipment Name	Registration No.	S / F	Fuel Type	PM - Filterable		PM 10 - Filterable		PM 2.5 - Filterable		PM - Condensable		Estimation Methods
				tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	
Dryer CH1899969	6-0275	F										C1,C2,C4
Dryer CH2404	6-0276	S	NG	7.20E-03	4.00E-02	7.20E-03	4.00E-02	7.20E-03	4.00E-02	2.16E-02	1.30E-01	C1,C2,C4
Dryer CH2404	6-0276	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
Dryer CH60648	6-0278	S	NG	5.10E-03	4.00E-02	5.10E-03	4.00E-02	5.10E-03	4.00E-02	1.54E-02	1.30E-01	C1,C2,C4
Dryer CH60648	6-0278	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
Dryer CH2615	6-0279	S										C1,C2,C4
Dryer CH2615	6-0279	F										C1,C2,C4
Dryer 60265	6-0311	S	NG	1.20E-03	1.30E-01	1.20E-03	1.30E-01	1.20E-03	1.30E-01	3.60E-03	4.00E-01	C1,C2,C4
Dryer 60265	6-0311	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
Extruder 20000806	6-0317	S										C1,C2,C4
Extruder 20000806	6-0317	F										C1,C2,C4
Extruder CH 0976	6-0318	S										C1,C2,C4
Extruder CH 0976	6-0318	F										C1,C2,C4
Extruder CH 2101	6-0324	S										C1,C2,C4
Extruder CH 2101	6-0324	F										C1,C2,C4
Extruder CH 74818	6-0326	S										C1,C2,C4
Extruder CH 74818	6-0326	F										C1,C2,C4
Extruder CH 2371	6-0327	S										C1,C2,C4
Extruder CH 2371	6-0327	F										C1,C2,C4
Mad Cow (inc. w/ 6-0104)	6-0328	S										C1,C2,C4
Mad Cow (inc. w/ 6-0104)	6-0328	F										C1,C2,C4

PARTICULATE MATTER
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Particulate Matter (PM) Pollutant

Equipment Name	Registration No.	S / F	Fuel Type	PM - Filterable		PM 10 - Filterable		PM 2.5 - Filterable		PM - Condensable		Estimation Methods
				tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	
Hulk Rolldown	6-0348	S										C1,C2,C4
Hulk Rolldown	6-0348	F										C1,C2,C4
Extruder CH-2262	6-0351	S										C1,C2,C4
Extruder CH-2262	6-0351	F										C1,C2,C4
Extruder CH#13831	6-0352	S										C1,C2,C4
Extruder CH#13831	6-0352	F										C1,C2,C4
Extruder CH#2013	6-0353	S										C1,C2,C4
Extruder CH#2013	6-0353	F										C1,C2,C4
Extruder Patrick	6-0361	S										C1,C2,C4
Extruder Patrick	6-0361	F										C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	S										C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	F										C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	S	NG	6.00E-04	5.00E-02	6.00E-04	5.00E-02	6.00E-04	5.00E-02	1.90E-03	1.50E-01	C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
TD1C	6-0365	S	NG	4.60E-03	4.00E-02	4.60E-03	4.00E-02	4.60E-03	4.00E-02	1.39E-02	1.20E-01	C1,C2,C4
TD1C	6-0365	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
Extruder Elvis	6-0367	S										C1,C2,C4
Extruder Elvis	6-0367	F										C1,C2,C4
Hulk 4	6-0372	S										C1,C2,C4
Hulk 4	6-0372	F										C1,C2,C4
Stingray Mixer	6-0373	S		0.00E+00	0.00E+00	1.80E-03	5.00E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4

PARTICULATE MATTER
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID | **W.L. Gore & Associates, Inc. - Cherry Hill** Facility Name | **Particulate Matter (PM)** Pollutant

Equipment Name	Registration No.	S / F	Fuel Type	PM - Filterable		PM 10 - Filterable		PM 2.5 - Filterable		PM - Condensable		Estimation Methods
				tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	
Stingray Mixer	6-0373	F		0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
Davinci	6-0381	S										C1,C2,C4
Davinci	6-0381	F										C1,C2,C4
Fluffernutter 1	6-0384	S										C1,C2,C4
Fluffernutter 1	6-0384	F										C1,C2,C4
Wharf Rat 2	6-0385	S										C1,C2,C4
Wharf Rat 2	6-0385	F										C1,C2,C4
Fluffernutter 2	6-0387	S										C1,C2,C4
Fluffernutter 2	6-0387	F										C1,C2,C4
Wharf Rat 1	6-0390	S		0.00E+00	0.00E+00	2.60E-03	9.00E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
Wharf Rat 1	6-0390	F		0.00E+00	0.00E+00	2.90E-03	1.00E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
TD1D	6-0396	S										C1,C2,C4
TD1D	6-0396	F										C1,C2,C4
extruders & ovens	7-0045	S	NG	1.50E-03	1.00E-02	1.50E-03	1.00E-02	1.50E-03	1.00E-02	4.60E-03	3.00E-02	C1,C2,C4
extruders & ovens	7-0045	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C1,C2,C4
Emergency Generator	9-0169	S	Diesel	2.00E-04	3.00E-02	0.00E+00	0.00E+00	2.00E-04	3.00E-02	1.00E-04	2.00E-02	C3
Dryer 20011771	9-0325	S										C1,C2,C4
Dryer 20011771	9-0325	F										C1,C2,C4
Total Emissions				1.60E-01	1.45E+00	6.45E-01	4.33E+00	1.60E-01	1.45E+00	4.79E-01	4.31E+00	

FORM 4

REPORTABLE TOXIC AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Reportable Toxics Pollutant

Equipment Name	**Registration No.**	S / F	Fuel Type	**Pollutant**	CASRN	Actual Emissions			Control Device	Efficiency (%)	Estimation Method
						tons/yr	lbs/day	lbs/hr			

Pollutant Totals	fill in these two columns		tons/yr	lbs/day	lbs/hr

FORM 4

REPORTABLE TOXIC AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Reportable Toxics Pollutant

Equipment Name	Registration No.	S / F	Fuel Type	Pollutant	CASRN	Actual Emissions			Control Device	Efficiency (%)	Estimation Method
						tons/yr	lbs/day	lbs/hr			
				Total Toxics	-	0.00E+00	0.00E+00	0.00E+00			

BILLABLE TOXIC AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

015-00079
Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill
Facility Name

Billable TAPs
Pollutant

Chemical Name	CAS Number	Actual Emissions			Estimation Method
		tons/yr	lbs/day	lbs/hr	
carbon disulfide	75-15-0				
carbonyl sulfide	463-58-1				
chlorine	7782-50-5				
cyanide compounds	57-12-5				
hydrochloric acid	7647-01-0				
hydrogen fluoride	7664-39-3				
methyl chloroform	71-55-6				
methylene chloride	75-09-2				
perchloroethylene	127-18-4				
phosphine	7803-51-2				
titanium tetrachloride	7550-45-0				

*if any amount of emissions are reported for these compounds, please also include the emissions broken down by equipment number in Form 4

GREENHOUSE GASES
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Greenhouse Gases Pollutant

Equipment Name	Registration No.	S / F	Fuel Type	CO_2		CH_4		N_2O		HFCs		PFCs		SF_6		Estimation Methods
				tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	
Boiler #1B Burn. 9.45 MBTU	4-0223	S	NG	1.15E+03	1.10E+04	2.16E-02	2.10E-01	2.20E-03	2.00E-02							C3
Boiler #2B Burn. 9.45 MBTU	4-0224	S	NG	1.10E+03	1.29E+04	2.07E-02	2.40E-01	2.10E-03	2.00E-02							C3
Boiler #3B Burn. 10.4MBTU	5-0149	S	NG	1.04E+03	1.20E+04	1.96E-02	2.30E-01	2.00E-03	2.00E-02							C3
FP Process Area	6-0041	S														C1,C2,C4
FP Process Area	6-0041	F														C1,C2,C4
Oven CH2203	6-0102	S	NG	2.17E+02	2.00E+03	4.10E-03	4.00E-02	4.00E-04	0.00E+00							C1,C2,C4
Oven CH2203	6-0102	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00							C1,C2,C4
FP Process Area	6-0104	S														C1,C2,C4
FP Process Area	6-0104	F														C1,C2,C4
Oven CH2383	6-0126	S	NG	1.46E+02	1.31E+03	2.70E-03	2.00E-02	3.00E-04	0.00E+00							C1,C2,C4
Oven CH2383	6-0126	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00							C1,C2,C4
Ovens	6-0130	S														C1,C2,C4
Ovens	6-0130	F														C1,C2,C4
Oven CH2204	6-0131	S	NG	1.77E+03	9.95E+03	3.33E-02	1.90E-01	3.30E-03	2.00E-02							C1,C2,C4
Oven CH2204	6-0131	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00							C1,C2,C4
Paint Spray Booth	6-0162	S														C1,C2,C4
Ovens	6-0173	S	NG	2.58E+03	1.44E+04	4.86E-02	2.70E-01	4.90E-03	3.00E-02							C1,C2,C4
Ovens	6-0173	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00							C1,C2,C4
Dryer CH1316	6-0260	S														C1,C2,C4
Dryer CH1316	6-0260	F														C1,C2,C4
Dryer CH1899969	6-0275	S														C1,C2,C4
Dryer CH1899969	6-0275	F														C1,C2,C4
Dryer CH2404	6-0276	S	NG	4.13E+02	2.47E+03	7.80E-03	5.00E-02	8.00E-04	0.00E+00							C1,C2,C4

GREENHOUSE GASES
EMISSIONS CERTIFICATION REPORT

015-00079 — Facility ID
W.L. Gore & Associates, Inc. - Cherry Hill — Facility Name
Greenhouse Gases — Pollutant

Equipment Name	Registration No.	S / F	Fuel Type	CO_2		CH_4		N_2O		HFCs		PFCs		SF_6		Estimation Methods
				tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	
Dryer CH2404	6-0276	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00							C1,C2,C4
Dryer CH60648	6-0278	S	NG	2.95E+02	2.43E+03	5.60E-03	5.00E-02	6.00E-04	0.00E+00							C1,C2,C4
Dryer CH60648	6-0278	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00							C1,C2,C4
Dryer CH2615	6-0279	S														C1,C2,C4
Dryer CH2615	6-0279	F														C1,C2,C4
Dryer 60265	6-0311	S	NG	6.95E+01	7.72E+03	1.30E-03	1.40E-01	1.00E-04	1.00E-02							C1,C2,C4
Dryer 60265	6-0311	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00							C1,C2,C4
Extruder 20000806	6-0317	S														C1,C2,C4
Extruder 20000806	6-0317	F														C1,C2,C4
Extruder CH 0976	6-0318	S														C1,C2,C4
Extruder CH 0976	6-0318	F														C1,C2,C4
Extruder CH 2101	6-0324	S														C1,C2,C4
Extruder CH 2101	6-0324	F														C1,C2,C4
Extruder CH 74818	6-0326	S														C1,C2,C4
Extruder CH 74818	6-0326	F														C1,C2,C4
Extruder CH 2371	6-0327	S														C1,C2,C4
Extruder CH 2371	6-0327	F														C1,C2,C4
Mad Cow (inc. w/ 6-0104)	6-0328	S														C1,C2,C4
Mad Cow (inc. w/ 6-0104)	6-0328	F														C1,C2,C4
Hulk Rolldown	6-0348	S														C1,C2,C4
Hulk Rolldown	6-0348	F														C1,C2,C4
Extruder CH-2262	6-0351	S														C1,C2,C4
Extruder CH-2262	6-0351	F														C1,C2,C4

GREENHOUSE GASES
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Greenhouse Gases Pollutant

Equipment Name	Registration No.	S / F	Fuel Type	CO_2		CH_4		N_2O		HFCs		PFCs		SF_6		Estimation Methods
				tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	
Extruder CH#13831	6-0352	S														C1,C2,C4
Extruder CH#13831	6-0352	F														C1,C2,C4
Extruder CH#2013	6-0353	S														C1,C2,C4
Extruder CH#2013	6-0353	F														C1,C2,C4
Extruder Patrick	6-0361	S														C1,C2,C4
Extruder Patrick	6-0361	F														C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	S														C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	F														C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	S	NG	3.58E+01	2.76E+03	7.00E-04	5.00E-02	1.00E-04	1.00E-02							C1,C2,C4
Bonham Dryer w/ Franky Afterburner	6-0363	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00							C1,C2,C4
TD1C	6-0365	S	NG	2.66E+02	2.39E+03	5.00E-03	4.00E-02	5.00E-04	0.00E+00							C1,C2,C4
TD1C	6-0365	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00							C1,C2,C4
Extruder Elvis	6-0367	S														C1,C2,C4
Extruder Elvis	6-0367	F														C1,C2,C4
Hulk 4	6-0372	S														C1,C2,C4
Hulk 4	6-0372	F														C1,C2,C4
Stingray Mixer	6-0373	S														C1,C2,C4
Stingray Mixer	6-0373	F														C1,C2,C4
Davinci	6-0381	S														C1,C2,C4
Davinci	6-0381	F														C1,C2,C4
Fluffernutter 1	6-0384	S														C1,C2,C4
Fluffernutter 1	6-0384	F														C1,C2,C4
Wharf Rat 2	6-0385	S														C1,C2,C4

GREENHOUSE GASES
EMISSIONS CERTIFICATION REPORT

015-00079 Facility ID

W.L. Gore & Associates, Inc. - Cherry Hill Facility Name

Greenhouse Gases Pollutant

Equipment Name	Registration No.	S / F	Fuel Type	CO_2		CH_4		N_2O		HFCs		PFCs		SF_6		Estimation Methods
				tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	
Wharf Rat 2	6-0385	F														C1,C2,C4
Fluffernutter 2	6-0387	S														C1,C2,C4
Fluffernutter 2	6-0387	F														C1,C2,C4
Wharf Rat 1	6-0390	S														C1,C2,C4
Wharf Rat 1	6-0390	F														C1,C2,C4
TD1D	6-0396	S														C1,C2,C4
TD1D	6-0396	F														C1,C2,C4
extruders & ovens	7-0045	S	NG	8.81E+01	6.08E+02	1.70E-03	1.00E-02	2.00E-04	0.00E+00							C1,C2,C4
extruders & ovens	7-0045	F	NG	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00							C1,C2,C4
Emergency Generator	9-0169	S	Diesel	1.28E+00	2.14E+02	1.00E-04	2.00E-02	0.00E+00	0.00E+00							C3
Dryer 20011771	9-0325	S														C1,C2,C4
Dryer 20011771	9-0325	F														C1,C2,C4
Total Emissions				9.16E+03	8.22E+04	1.73E-01	1.56E+00	1.75E-02	1.30E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	

List of Maryland Air Toxics

Number only	CAS w/ hyphen	Air Toxic	Reporting Threshold lbs/hr	Reporting Threshold tons/yr	Billable?
75070	75-07-0	Acetaldehyde	0.1	0.1	
60355	60-35-5	Acetamide	0.1	1	
75058	75-05-8	Acetonitrile	1	1	
98862	98-86-2	Acetophenone	0.1	1	
53963	53-96-3	2-Acetylaminofluorene	0.01	0.01	
107028	107-02-8	Acrolein	0.001	0.01	
79061	79-06-1	Acrylamide	0.0001	0.0001	
79107	79-10-7	Acrylic acid	0.1	0.1	
107131	107-13-1	Acrylonitrile	0.01	0.01	
107051	107-05-1	Allyl chloride	0.01	0.1	
92671	92-67-1	4-Aminobiphenyl	0.01	0.1	
7664417	7664-41-7	Ammonia	0.1	1	
62533	62-53-3	Aniline	0.1	0.1	
90040	90-04-0	o-Anisidine	0.001	0.01	
71432	71-43-2	Benzene	0.01	0.1	
92875	92-87-5	Benzidine	0.01	0.00001	
98077	98-07-7	Benzoic trichloride	0.01	0.0001	
100447	100-44-7	Benzyl chloride	0.01	0.1	
92524	92-52-4	Biphenyl	0.01	0.1	
117817	117-81-7	DEHP	0.01	0.1	
542881	542-88-1	Bis(chloromethyl) ether	0.00001	0.00001	
75252	75-25-2	Bromoform	0.01	0.1	
106990	106-99-0	1,3-Butadiene	0.01	0.001	
156627	156-62-7	Calcium cyanamide	0.001	0.01	
133062	133-06-2	Captan	0.01	0.1	
63252	63-25-2	Carbaryl	0.01	0.1	
75150	75-15-0	Carbon disulfide	0.1	1	Yes
56235	56-23-5	Carbon tetrachloride	0.1	0.01	
463581	463-58-1	Carbonyl sulfide	0.1	1	Yes
120809	120-80-9	Catechol	0.1	1	
133904	133-90-4	Chloramben	0.1	1	
57749	57-74-9	Chlordane	0.001	0.01	
7782505	7782-50-5	Chlorine	0.01	0.1	Yes
10049044	10049-04-4	Chlorine dioxide	0.001	0.01	
79118	79-11-8	Chloroacetic acid	0.01	0.1	
532274	532-27-4	2-Chloroacetophenone	0.001	0.01	
108907	108-90-7	Chlorobenzene	0.1	1	
510156	510-15-6	4,4'-Dichlorobenzilic acid eth	0.01	0.1	
67663	67-66-3	Chloroform	0.1	0.01	
107302	107-30-2	Chloromethyl methyl ether	0.01	0.1	
126998	126-99-8	Chloroprene	0.1	1	
1319773	1319-77-3	Cresol	0.1	1	
95487	95-48-7	o-Cresol	0.1	1	
108394	108-39-4	m-Cresol	0.1	1	
106445	106-44-5	p-Cresol	0.1	1	
98828	98-82-8	Cumene	1	10	
94757	94-75-7	2,4-D	0.1	0.1	
3547044	3547-04-4	DDE	0.01	0.1	
334883	334-88-3	Diazomethane	0.001	0.01	

Number only	CAS w/ hyphen	Air Toxic	Reporting Threshold lbs/hr	Reporting Threshold tons/yr	Billable?
132649	132-64-9	Dibenzofuran	0.1	1	
96128	96-12-8	1,2-Dibromo-3-chloropropane	0.01	1	
84742	84-74-2	Dibutylphthalate	0.01	0.1	
106467	106-46-7	1,4-Dichlorobenzene	1	0.1	
91941	91-94-1	3,3'-Dichlorobenzidine	0.001	0.001	
111444	111-44-4	Bis(2-dichloroethyl) ether	0.1	1	
78875	78-87-5	1,2-Dichloropropane	1	10	
542756	542-75-6	1,3-Dichloropropylene	0.01	0.01	
62737	62-73-7	Dichlorvos	0.01	0.01	
60571	60-57-1	Dieldrin	0.001	0.01	
111422	111-42-2	Diethanolamine	0.01	0.1	
64675	64-67-5	Diethyl sulfate	0.01	0.1	
119904	119-90-4	3,3'-Dimethoxybenzidine	0.1	0.1	
60117	60-11-7	4-Dimethylaminoazobenzene	0.01	0.01	
119937	119-93-7	o-Tolidine	0.1	0.1	
121697	121-69-7	N,N-Dimethylaniline	0.1	1	
79447	79-44-7	N,N-Dimethylcarbamyl chloride	0.01	0.1	
68122	68-12-2	N,N-Dimethylformamide	0.1	1	
57147	57-14-7	1,1-Dimethylhydrazine	0.0001	0.0001	
131113	131-11-3	Dimethylphthalate	0.01	0.1	
77781	77-78-1	Dimethyl sulfate	0.001	0.01	
534521	534-52-1	2,4-Dinitro-6-methyl-phenol	0.001	0.01	
51285	51-28-5	2,4-Dintrophenol	0.001	0.001	
121142	121-14-2	2,4-Dinitrotoluene	0.01	0.1	
123911	123-91-1	p-Dioxane	1	0.1	
122667	122-66-7	N,N'-Diphenylhydrazine	0.01	0.001	
106898	106-89-8	Epichlorohydrin	0.01	0.1	
106887	106-88-7	1,2-Butylene oxide	0.01	0.01	
140885	140-88-5	Ethyl acrylate	0.1	0.01	
100414	100-41-4	Ethylbenzene	1	10	
51796	51-79-6	Urethane {Ethyl carbamate}	0.01	0.1	
75003	75-00-3	Ethylene chloride	0.001	0.01	
106934	106-93-4	1,2-Dibromoethane	1	0.001	
107062	107-06-2	1,2-Dichloroethane	0.1	0.01	
107211	107-21-1	Ethylene glycol	1	1	
151564	151-56-4	Ethyleneimine	0.01	0.01	
75218	75-21-8	Ethylene oxide	0.01	0.001	
96457	96-45-7	1,3-Ethylenethiourea	0.1	0.01	
75343	75-34-3	Ethylidene dichloride	1	10	
50000	50-00-0	Formaldehyde	0.001	0.01	
76448	76-44-8	Heptachlor	0.0001	0.001	
118741	118-74-1	Hexachlorobenzene	0.00001	0.001	
87683	87-68-3	Hexachloro-1,3-butadiene	0.001	0.01	
319846	319-84-6	1,2,3,4,5,6-Hexachlorocyclohexane (alpha)	0.001	0.01	
319857	319-85-7	1,2,3,4,5,6-Hexachlorocyclohexane (beta)	0.001	0.01	
58899	58-89-9	1,2,3,4,5,6-Hexachlorocyclohexane (delta)	0.001	0.01	
319868	319-86-8	1,2,3,4,5,6-Hexachlorocyclohexane (gamma)	0.001	0.01	
608731	608-73-1	1,2,3,4,5,6-Hexachlorocyclohexane (technical)	0.001	0.01	
77474	77-47-4	Hexachlorocyclopentadiene	0.001	0.001	
67721	67-72-1	Hexachloroethane	0.1	0.1	
822060	822-06-0	Hexamethylene diisocyanate	0.0001	0.001	

Number only	CAS w/ hyphen	Air Toxic	Reporting Threshold lbs/hr	Reporting Threshold tons/yr	Billable?
680319	680-31-9	Hexamethyl phosphoramide	0.1	0.1	
110543	110-54-3	Hexane	1	10	
302012	302-01-2	Hydrazine	0.001	0.001	
7647010	7647-01-0	Hydrochloric acid	0.1	0.1	Yes
7664-39-3	7664-39-3	Hydrogen fluoride, anhydrous	0.01	0.1	Yes
123319	123-31-9	Hydroquinone	0.01	0.1	
78591	78-59-1	Isophorone	0.1	1	
58899	58-89-9	Lindane	0.001	0.01	
608731	608-73-1	1,2,3,4,5,6-Hexachlorocyclohexane	0.001	0.01	
108316	108-31-6	Maleic anhydride	0.01	0.01	
67561	67-56-1	Methanol	1	10	
72435	72-43-5	Methoxychlor	0.1	0.1	
74839	74-83-9	Bromomethane (methyl bromide)	0.01	0.01	
74873	74-87-3	Chloromethane	0.1	0.1	
71-55-6	71-55-6	1,1,1-Trichloroethane	10	10	Yes
78933	78-93-3	MEK	10	10	
60344	60-34-4	Methylhydrazine	0.0001	0.001	
74884	74-88-4	Methyl iodide	0.1	0.1	
108101	108-10-1	MIBK	1	10	
624839	624-83-9	Methyl isocyanate	0.0001	0.001	
80626	80-62-6	Methylmethacrylate	1	10	
1634044	1634-04-4	Tert-butyl methyl ether	1	10	
101144	101-14-4	4,4'-methylenebis(2-chloroaniline)	0.001	0.01	
75092	75-09-2	Methylene chloride	1	1	Yes
101688	101-68-8	Methylene diphenyl diisocyanate	0.0001	0.001	
101779	101-77-9	4,4'-Methylenedianiline	0.01	0.01	
91203	91-20-3	Naphthalene	0.1	1	
98953	98-95-3	Nitro-benzene	0.01	0.1	
92933	92-93-3	4-Nitrobiphenyl	0.1	0.1	
100027	100-02-7	4-Nitrophenol	0.01	0.01	
79469	79-46-9	2-Nitropropane	0.1	0.0001	
684935	684-93-5	1-Methyl-1-nitrosourea	0.001	0.01	
62759	62-75-9	N-Nitrosodimethylamine	0.001	0.00001	
59892	59-89-2	N-Nitrosomorpholine	0.01	0.01	
56382	56-38-2	Parathion	0.001	0.001	
82688	82-68-8	Quintozene (Pentachloronitrobenzene)	0.001	0.01	
87865	87-86-5	Pentachlorophenol	0.001	0.01	
108952	108-95-2	Phenol	0.1	1	
106503	106-50-3	1,4-Benzenediamine	0.001	0.001	
75445	75-44-5	Phosgene	0.001	0.01	
7803512	7803-51-2	Phosphine	0.001	0.01	Yes
7723140	7723-14-0	Yellow Phosphorus	0.001	0.001	
85449	85-44-9	Phthalic anhydride	0.1	0.1	
1336363	1336-36-3	PCBS	0.01	0.001	
1120714	1120-71-4	Propane sultone	10	10	
57578	57-57-8	beta-Propiolactone	0.01	0.1	
123386	123-38-6	Propionaldehyde	0.1	0.1	
114261	114-26-1	Propoxur	0.001	0.01	
75569	75-56-9	Propylene oxide	0.1	0.1	
75558	75-55-8	Propylenimine	0.01	0.1	
91225	91-22-5	Quinoline	0.01	0.1	

Number only	CAS w/ hyphen	Air Toxic	Reporting Threshold lbs/hr	Reporting Threshold tons/yr	Billable?
106514	106-51-4	Quinone	0.001	0.01	
100425	100-42-5	Styrene	1	1	
96093	96-09-3	Styrene oxide	0.1	0.1	
1746016	1746-01-6	2,3,7,8-Tetrachlorodibenzo-p-d	0.0000001	0.00000001	
79345	79-34-5	1,1,2,2-Tetrachlorethane	0.1	0.1	
127184	127-18-4	1,1,2,2-Tetrachloroethene	1	10	Yes
7550450	7550-45-0	Titanium(IV) chloride	0.01	0.1	Yes
108883	108-88-3	Toluene	1	10	
95807	95-80-7	2,4-Diaminotoluene	0.0001	0.0001	
584849	584-84-9	Toluene-2,4-diisocyanate	0.0001	0.01	
95534	95-53-4	o-Toluidine	0.1	0.01	
8001352	8001-35-2	Toxaphene	0.001	0.001	
120821	120-82-1	1,2,4 Trichlorobenzene	0.1	1	
79005	79-00-5	1,1,2-Trichloroethane	0.1	1	
79016	79-01-6	Trichloroethylene	1	10	
95954	95-95-4	2,4,5-Trichlorophenol	0.01	0.1	
88062	88-06-2	2,4,6-Trichlorophenol	0.01	0.1	
121448	121-44-8	Triethylamine	0.01	0.1	
1582098	1582-09-8	Trifluralin	0.1	0.1	
540841	540-84-1	2,2,4-Trimethylpentane	0.1	1	
108054	108-05-4	Vinyl acetate	0.1	1	
593602	593-60-2	Vinyl bromide	0.1	1	
75014	75-01-4	Vinyl chloride	0.1	0.01	
75354	75-35-4	Vinylidene chloride	0.1	1	
1330207	1330-20-7	Xylene	1	10	
95476	95-47-6	o-Xylene	1	10	
108383	108-38-3	m-Xylene	1	10	
106423	106-42-3	p-Xylene	1	10	
7440360	7440-36-0	Antimony	0.001	0.01	
7440382	7440-38-2	Arsenic	0.0001	0.0001	
7440417	7440-41-7	Beryllium	0.00001	0.0001	
7440439	7440-43-9	Cadmium	0.0001	0.0001	
7440473	7440-47-3	Chromium	0.001	0.01	
7440484	7440-48-4	Cobalt	0.0001	0.001	
TAP001	TAP001	Coke Oven Emissions	0.001	0.001	
7440508	7440-50-8	Copper	0.001	0.01	
57125	57-12-5	Cyanide Compounds (Cyanide Ion CAS)	0.01	0.1	Yes
TAP002	TAP002	Glycol ethers	0.1	1	
7439921	7439-92-1	Lead	0.0001	0.001	
7439965	7439-96-5	Manganese	0.001	0.01	
7439976	7439-97-6	Mercury	0.0001	0.001	
7440020	7440-02-0	Nickel	0.001	0.001	
TAP003	TAP003	Polycyclic Aromatic Compounds	0.0001	0.0001	
7782492	7782-49-2	Selenium	0.001	0.01	
TAP004	TAP004	Antimony Compounds	0.001	0.01	
TAP005	TAP005	Arsenic Compounds	0.0001	0.0001	
TAP006	TAP006	Beryllium Compounds	0.00001	0.0001	
TAP007	TAP007	Cadmium Compounds	0.0001	0.0001	
TAP008	TAP008	Chromium (III) Compounds	0.001	0.01	
TAP009	TAP009	Chromium (IV) Compounds	0.001	0.00001	
TAP010	TAP010	Cobalt Compounds	0.0001	0.001	

Number only	CAS w/ hyphen	Air Toxic	Reporting Threshold lbs/hr	Reporting Threshold tons/yr	Billable?
TAP011	TAP011	Lead Compounds	0.0001	0.001	
TAP012	TAP012	Manganese Compounds	0.001	0.01	
TAP013	TAP013	Mercury Compounds	0.0001	0.001	
TAP014	TAP014	Nickel Compounds	0.001	0.001	
TAP015	TAP015	Selenium Compounds	0.001	0.01	
TAP016	TAP016	Zinc Compounds	0.01	0.1	
		POM includes:			
83329	83-32-9	Acenaphthene	0.001	0.01	
208968	208-96-8	Acenaphthylene	0.01	0.1	
120127	120-12-7	Anthracene	0.001	0.01	
56553	56-55-3	Benz[a]anthracene	0.001	0.001	
50328	50-32-8	Benzo(a)pyrene	0.001	0.0001	
205992	205-99-2	Benzo(b)fluoranthene	0.1	0.001	
191242	191-24-2	Benzo(ghi)perylene	0.001	0.01	
207089	207-08-9	Benzo(k)fluoranthene	0.01	0.01	
218019	218-01-9	Chrysene	0.001	0.01	
53703	53-70-3	Dibenz(a,h)anthracene	0.0001	0.0001	
206440	206-44-0	Fluoranthene	0.1	0.1	
86737	86-73-7	Fluorene	0.001	0.01	
193395	193-39-5	Indeno(1,2,3-c,d)pyrene	0.001	0.001	
91203	91-20-3	Naphthalene	0.1	1	
85018	85-01-8	Phenanthrene	0.01	0.01	
129000	129-00-0	Pyrene	0.001	0.01	

Note: This list is intended as a resource and **not** meant to replace the PDF found on the AQCP website or any other toxics regulation. Please double check with source material.

AQCP Website

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U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

FORM A-COMP - ANNUAL COMPLIANCE CERTIFICATION

INSTRUCTIONS: There are 3 pages to this form. On this page, complete Sections A and B once with respect to the entire annual compliance Certification.

A. GENERAL INFORMATION

1. **Identifying Information.**

Source or company name **W.L.Gore & Associates, Inc., Cherry Hill Plant**

Mailing address: Street or P.O.Box 2401 Singerly Road

City Elkton State MD ZIP 21921 -

Contact person Brittany Frields Title Environmental Specialist

Telephone (410) 398 - 6400 Ext. 62430 Part 71 permit no. 24-015-0079

2. **Reporting Period** The reporting period should be the one-year, or shorter period, required by your part 71 permit. It will be assumed that the beginning date begins and ends at Midnight (12 A.M.), unless you specify otherwise.

Period beginning 1 / 1 /2021 **Period ending 12 / 31 / 2021**

B. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

1. **RESPONSIBLE OFFICIAL:** Identify the responsible official and provide contact information.

Name: (Last) Burlew (First) Matthew (Middle)

Title Plant Leader

Street or Post Office Box 2401 Singerly Road

City Elkton State MD ZIP 21921 -

Telephone (410) 398 - 6400 Ext. Facsimile ( ) -

2. **Certification of Truth, Accuracy and Completeness.** The Responsible Official must sign this statement after the form is completed for each applicable requirement.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate, and complete.

Name (signed) Matthew Burlew

Name (printed or typed) Matthew Burlew Date: 2/8/2022

INSTRUCTIONS: Use this page to describe the compliance status of each permit term or condition. This page may be used to provide information on 2 different permit terms or conditions. Copy this page as many times as necessary to cover all permit terms and conditions.

C1. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 1-1 **Applicable Standards and limits:** A. **Visible Emissions** COMAR 26.11.06.02C(1) – Visible Emission 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 greater than 20 percent opacity." *Filled Products front end controlled by baghouse*	EU 1-1. – Particulate Matter Emitting Units Forming: Mixing and Compounding (6-0104) & High Shear Mixers (6-0328)	___ Intermittent Compliance __X__ Continuous Compliance

D1. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	**Compliance status during reporting period**
Testing Requirements: A. None.	___ Intermittent Compliance __X__ Continuous Compliance
Monitoring Requirements: A. Conducts a monthly 6-minute visual observation of the baghouse exhaust while it is in operation. If no visible emissions are observed in six consecutive monthly observations, the frequency will be decreased from monthly to quarterly for the baghouse exhaust. If visible emissions are observed during any quarter visual observation, the frequency will be resumed to monthly observations and maintain that schedule until no visible emissions are observed in six consecutive monthly visual observations. If visible emissions are observed during any observation, an 18-minute test of opacity in accordance with Method 9, shall begin within 24-hours of any observation of visible emissions. **[Reference: COMAR 26.11.03.06C]** *During this reporting period, observations were conducted as required, and no visible emissions were observed.*	___ Intermittent Compliance __X__ Continuous Compliance
Record Keeping Requirements: A. Maintains on site, a log of the dates and results of visible emissions observations for a period of at least 5 years. **[Reference: COMAR 26.11.03.06C].** *During this reporting period, observations were conducted and records will be maintained on site for a period of at least 5 years.*	___ Intermittent Compliance __X__ Continuous Compliance
Reporting Requirements: A. Shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations." *No visible emissions were reported.*	___ Intermittent Compliance __X__ Continuous Compliance

C2. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 1-1 **Applicable Standards and limits:** B. **Particulate Matter** COMAR 26.11.06.03B(1) – Particulate Matter from Confined Sources. "A person may not cause or permit particulate matter to be discharged from any installation constructed on or after January 17, 1972 in excess of 0.05 gr/scfd (115 kg/dscm)." *Filled Products front end controlled by baghouse & Fugitive Emission*	EU 1-1 – Particulate Matter Emitting Units Forming: Mixing and Compounding (6-0104) & High Shear Mixers (6-0328)	___ Intermittent Compliance _X_ Continuous Compliance

D2. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	**Compliance status during reporting period**
Testing Requirements: B. None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: B. Maintains a preventive maintenance plan for the baghouse that describes the maintenance activity and time schedule for completing each activity. Perform maintenance activities within the time frames established in the plan and maintain a log with records of the dates and description of the maintenance that was performed. **[Reference: COMAR 26.11.03.06C].** *Maintenance activities are scheduled through an electronic database that automatically triggers work orders for required maintenance and documents the completion of work. The plant's leadership team holds associates accountable for performing maintenance activities within the time frame established by the plan.*	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: B. Maintains a copy of the preventive maintenance plan and a record of the dates of and description of maintenance activity performed. Maintain records of the baghouse malfunctions and the corrective actions taken to bring into proper operation. **[Reference: COMAR 26.11.03.06C].** *Documentation is maintained in the electronic database.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: B. A copy of the preventive maintenance plan, records of maintenance activities and corrective actions are available to the Department upon request. **[Reference: COMAR 26.11.03.06C].**	___ Intermittent Compliance _X_ Continuous Compliance

C3. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-1. **Applicable Standards and limits:** A. **Visible Emissions** COMAR 26.11.09.05A(1) - Fuel Burning Equipment. "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 greater than 20 percent opacity." Exceptions. COMAR 26.11.09.05A(3) "Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, start-up, or occasional cleaning of control equipment which do not exceed 40 percent opacity for a period or periods aggregating not more than 6 consecutive minutes in any 60 minutes."	EU 2-1. – Boilers	___ Intermittent Compliance _X_ Continuous Compliance

D3. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	**Compliance status during reporting period**
Testing Requirements: A. None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: A. Operate and maintain the boilers in a manner to prevent visible emissions. [**Reference: COMAR 26.11.03.06C**]. *Routine and non-routine maintenance activities are scheduled through an electronic database that automatically triggers work orders for required maintenance and documents the completion of work. Additionally, routine maintenance activities to be completed by contractors are scheduled quarterly and during plant shutdowns. Non-routine maintenance activities to be completed by contractors are scheduled as needed.*	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: A. Maintain an operations manual and preventive maintenance plan for the boilers. Maintain a log of maintenance performed that relates to combustion performance [**Reference: COMAR 26.11.03.06C**]. *Routine and non-routine maintenance activities are scheduled through an electronic database that automatically triggers work orders for required maintenance and documents the completion of work. Additionally, routine maintenance activities to be completed by contractors are scheduled quarterly and during plant shutdowns. Non-routine maintenance activities to be completed by contractors are scheduled as needed. Upon completion, contractors provide written documentation of the maintenance activities performed. Maintenance records are kept for 5 years.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: A. Report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". *No visible emissions were observed.*	___ Intermittent Compliance _X_ Continuous Compliance

C4. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-1. **Applicable Standards and limits:** B. The three (3) Burnham boilers shall burn natural gas only. [Reference: MDE Permit to Construct Nos. 4-0223 & 4-0224, 5-0149 Part C(3) issued January 24, 2018]Control of Sulfur oxides.	EU 2-1. – Boilers	___ Intermittent Compliance _X_ Continuous Compliance

D4. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	**Compliance status during reporting period**
Testing Requirements: B. None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: B. None.	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: B. The Permittee shall retain records of type of fuel used and hours of operation for the boilers on site. [Reference: MDE Permit to Construct Nos. 015-0079-4-0223, 4-0224-, & 5-0149-Part D issued January 24, 2018] *Records of fuel usage and hours of operation are maintained.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: **B.** The Permittee shall submit records of the quantity and type of fuels burned with the annual emissions certification report. [Reference: Title V, Section III, Condition 8]	___ Intermittent Compliance _X_ Continuous Compliance

C5. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-1. **Applicable Standards and limits:** **C. NSPS Boilers** §60.40c - Applicability and delegation of authority. (a) Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h).	EU 2-1. – Boilers	___ Intermittent Compliance _X_ Continuous Compliance

D5. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: C. None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: C. None.	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: C. The Permittee shall retain records of the amount of each fuel combusted during each calendar month. [Reference: §60.48c(g)(2)] *Records are maintained.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: C. The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period. **[Reference: §60.48c(j)]**	___ Intermittent Compliance _X_ Continuous Compliance

C6. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-2. **Applicable Standards and limits:** A. Control of Visible Emissions: COMAR 26.11.09.05B - 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 B(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 the exhaust system. (b) Section B(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 B(2) and (3) does not apply while maintenance, repair, or testing is being performed by qualified mechanics. *[9-0169] – One Onan 1200 bhp (800 kW) diesel emergency generator*	EU 2-2. – Emergency Generator	___ Intermittent Compliance _X_ Continuous Compliance

D6. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	**Compliance status during reporting period**
Testing Requirements: None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: A. The emergency generator shall operate and be maintained in a manner to prevent visible emissions. **[Reference: COMAR 26.11.03.06C]** *A preventive maintenance plan is maintained. Routine and non-routine maintenance activities are scheduled through an electronic database that automatically triggers work orders for required maintenance and documents the completion of work.*	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: A. An operations manual and preventative maintenance plan must be in place. A log of maintenance performed that relates to combustion performance must be maintained. [**Reference: COMAR 26.11.03.06C].** *An operations manual and preventive maintenance plan has been established. Routine and non-routine maintenance activities are scheduled through an electronic database that automatically triggers work orders for required maintenance and documents the completion of work. A log that tracks run time and maintenance is located in place.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: A. Incidents of visible emissions shall be reported in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations" *No visible emissions were observed during this reporting period.*	___ Intermittent Compliance _X_ Continuous Compliance

C8. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-2. **Applicable Standards and limits:** A. Control of Sulfur Oxides Emissions: COMAR 26.11.09.07A(1)(c) – 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: Distillate fuel oils, 0.3 percent." *[9-0169] – One Onan 1200 bhp (800 kW) diesel emergency generator*	EU 2-2. – Emergency Generator	___ Intermittent Compliance _X_ Continuous Compliance

D8. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	**Compliance status during reporting period**
Testing Requirements: None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: A. A certification from the fuel supplier is received with every shipment indicating that the oil complies with the limitation on the sulfur content of fuel oil. **[Reference: COMAR 26.11.03.06C]**	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: A. Fuel supplier certifications that are received with every shipment are kept for at least 5 years. **[Reference: Permit go construct No. 9-0169, Part E(2)].**	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: A. Fuel supplier certifications are available to the Department upon request. **[Reference: COMAR 26.11.09.07C].**	___ Intermittent Compliance _X_ Continuous Compliance

C9. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)

EU 2-2.

Applicable Standards and limits:

§63.6595 – When do I have to comply with this subpart?

(a) *Affected Sources*. (1)"…..If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, **or 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.** …..".

§63.6603 – What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

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 to this subpart.

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 1b and Table 2b to 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

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 …
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 or local law under which the risk was deemed unacceptable.

§63.6605 – What are the general requirements for complying with this subpart?

(a) You must be in compliance with the4 emission limitations and operating limitations in the 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.

[9-0169] – One Onan 1200 bhp (800 kW) diesel emergency generator

Unit ID(s):

EU 2-2. – Emergency Generator

Compliance status during reporting period

___ Intermittent Compliance

_X_ Continuous Compliance

D9. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: **§63.6625 – What are my monitoring, installation, collection, operation, and maintenance requirements?** "(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (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 HAP emissions." "(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 emissions 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." "(h) If you operate a new, reconstructed, or **existing stationary engine**, you must minimize the engine's time spent at 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,2a 2c and 2d to this subpart apply. (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 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; ore 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 planed for the engine." **§63.6640 – How do I demonstrate continuous compliance with the4 emission limitations and operating limitations?** (a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subject. (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, Table 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 y RICE. "(f) *Requirements for emergency stationary RICE*. (1) If you own or operate an existing emergency stationary RICE with a site rating of less that 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 area source of HAP emissions**, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1)(i) through (iii) 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	___ Intermittent Compliance _X_ Continuous Compliance

required in the owner or operator maintains records indicating the Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. (iii) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for the facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power." *Oil is changed annually in the generator.* *The generator is operated in a manner to minimize emissions.* *The generator has a non-resettable hour meter.*	
Record Keeping Requirements: **§63.6655 – What records must I keep?** (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 operated any of the following stationary RICE; (2) An existing stationary emergency RICE. (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. (f) If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, 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 locate at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines. *Records of maintenance and a log showing hours of operation are maintained for the generator.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: "Sources must report any failure to perform the management practice on the schedule required and the Federal, State, or local law under which the risk was deemed unacceptable." **[Footnote 2 of Table 2d]** *No reporting was required.*	___ Intermittent Compliance _X_ Continuous Compliance

C10. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 3-1, EU 3-2, & EU 3-3 **Applicable Standards and limits:** A. **Control of Volatile Organic Compounds** 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) As practical, scheduling of operations to minimize color or material changes when applying VOC coatings or other materials by spray gun; (iv) For spray gun applications of coatings, use of high volume low pressure (HVLP) or other high efficiency application methods where practical;-and (v) As practical, mixing or blending materials containing VOC in closed containers and taking preventive measures to minimize emissions for products that contain VOC. I 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." EU 3-1: Shaping & Forming Equipment – General Exhaust EU 3-2: Drying Oven ventilated through the Oxidizer Control System EU 3-3: Batch Ovens to Atmosphere Please Note: The oxidizer control system includes the following oxidizers: SARA (oxidizer #1), T-Ox (oxidizer #2) and WILLIE (oxidizer #3).	EU 3-1: Shaping & Forming Equipment – General Exhaust EU 3-2: Drying Oven ventilated through the Oxidizer Control System EU 3-3: Batch Ovens to Atmosphere	X Intermittent Compliance ___ Continuous Compliance

D10. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	**Compliance status during reporting period**
Testing Requirements: None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: Control of VOC Emissions *Monthly Facility-wide inspections are performed, to determine the compliance status with regard to "good operating practices".* **[Reference: COMAR 26.11.03.06C**]	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: *The following is maintained:* 1) *Written descriptions of all "good operating practices" designed to minimize VOC emissions from facility-wide operations.* **[Reference: COMAR 26.11.19.02I]** 2) *Records of all inspections, which include the name of the inspector, the date and time of the inspection, and an account of the findings.* **[Reference: COMAR 26.11.03.06C]**	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: *Good operating practices are available to the Department upon request*	___ Intermittent Compliance _X_ Continuous Compliance

C11. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-2, 3-1, EU 3-2, & EU 3-3 **Applicable Standards and limits:** Control of VOC Emissions **COMAR 26.11.19.16C** - Control of VOC 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." **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."	EU 3-1: Shaping & Forming Equipment – General Exhaust EU 3-2: Drying Oven ventilated through the Oxidizer Control System EU 3-3: Batch Ovens to Atmosphere	___ Intermittent Compliance _X_ Continuous Compliance

D11. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	**Compliance status during reporting period**
Testing Requirements: A. None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: *1) Monthly inspections for VOC leaks are completed at least once each calendar month and are part of the "Site Inspection" form;* *2) Leaks are tagged immediately with I.D. Number, the date leak was discovered, and the name of the person who discovered the leak. The tag remains in place until the leak is repaired;* *3) Immediate action is taken to repair/control all observed leaks that can be repaired within 48 hours;* *4) All other leaking components are repaired not later than 15 days after the leak is discovered in accordance with COMAR 26.11.19.16C(4);* *5) If a replacement part is needed, it is ordered within 3 days after discovery of the leak, and the leak is repaired within 48 hours after receiving the part;* *6) 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 is maintained; and* *7) Components that are inaccessible and cannot be repaired or that cannot be repaired during operation of the source, are documented in the maintenance database and are scheduled for repair during the next source shutdown.* **[Reference: COMAR 26.11.19.16C and D]**	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: 3) *Logs that include the name of the inspector, the date of the leak inspection, and the findings, a list of leaks by tag identification number, the date the part was ordered, and the date the leak was repaired are maintained; and* *Logs are available to the Department upon request and are maintained for a period of not less than two years from the date of the leaks' occurrence.* **[Reference: COMAR 26.11.19.16C(6)]**	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: A. *Leak inspection logs are available to the Department upon request.*	___ Intermittent Compliance _X_ Continuous Compliance

C12. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 3-2 **Applicable Standards and limits:** A. **Visible Emissions.** COMAR 26.11.06.02C(1) – Visible Emission 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 greater than 20 percent opacity." EU 3-2: Drying Oven ventilated through the Oxidizer Control System Please Note: The oxidizer control system includes the following oxidizers: SARA (oxidizer #1), TEC (oxidizer #2) and WILLIE (oxidizer #3).	EU 3-2: Drying Oven ventilated through the Oxidizer Control System	___ Intermittent Compliance _X_ Continuous Compliance

D12. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	**Compliance status during reporting period**
Testing Requirements: A.None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: A. Visually inspects the exhaust of the oxidizer control system at least monthly for a 6-minute period when the process lines are in operation and records the results of each observation. If no visible emissions are observed in six consecutive monthly observations, the frequency of visual observation will decrease from monthly to quarterly. If emissions are visible greater than 20 percent opacity from oxidizer control system, the following will be performed, unless it can be shown, through a Method 9 test, that the visible emissions are zero percent opacity: (a) inspect all process and/or control equipment related to emission point; (b) perform all necessary repairs and/or adjustments to the oxidizers, within 48 hours, so that visible emissions in the exhaust gases are less than 20 percent opacity; and (c) document, in writing, the results of the inspections and the repairs and/or adjustments made to the oxidizer control system. If visible emissions greater than 20% opacity have not been eliminated within 48 hours, a Method 9 observation shall be performed once daily when the process lines are in operation until the visible emissions have been reduced to less than 20 percent opacity. **[Reference: COMAR 26.11.03.06C]** *During this reporting period, observations were conducted as required, and no visible emissions were observed.*	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: A. The Permittee shall keep records of results of visual emission observations and document any incidence of visible emissions and corrective action taken by the Permittee. **[Reference: COMAR 26.11.03.06C].** *Records of observations are maintained on site.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: A. Incidents of visible emissions will be reported in accordance with Permit Condition 4, Section III, "Report of Excess Emissions and Deviations". *No visible emissions were reported.*	___ Intermittent Compliance _X_ Continuous Compliance

C13. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 3-2 **Applicable Standards and limits:** **B. COMAR 26.11.19.30E – General Requirements for FPM Process Installations** C. "(1) A person who owns or operates an FPM process installation that has actual uncontrolled VOC emissions of 50 pounds or more per day shall vent the emissions into a thermal oxidizer system or other control method approved by the Department to destroy or reduce VOC emissions by 85 percent or more, overall. Control of Volatile Organic Compounds EU 3-2: Drying Oven ventilated through the Oxidizer Control System Please Note: The oxidizer control system includes the following oxidizers: SARA (oxidizer #1), TEC (oxidizer #2) and WILLIE (oxidizer #3).	EU 3-2: Drying Oven ventilated through the Oxidizer Control System	___ Intermittent Compliance _X_ Continuous Compliance

D13. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	**Compliance status during reporting period**
Testing Requirements: B. COMAR 26.11.19.30F. Demonstration of Compliance. "Compliance with this regulation shall be demonstrated using the applicable VOC test methods specified in COMAR 26.11.01.04C or other test method approved by the Department." The Permittee shall conduct performance testing of the primary oxidizer in the control system once during the 5-year term of the permit. [Reference: COMAR 26.11.03.06C].Conduct performance testing of the primary oxidizer in the control system once during the 5-year term of the permit. Submit a test protocol to the Department for approval at least 30 days prior to proposed date of the test. *Stack testing was performed on the two lead oxidizers "Willie" and "Sara" to the Oxidizer Control System in August 2021. EPA Reference Methods used included: Reference Methods 1-4, and 25A. The stack test reports were submitted to the MDE and showed an average destruction efficiency of 98.57% for "Willie" oxidizer and 99.20% for "Sara" oxidizer. A protocol was submitted to MDE within 30 days prior to the test date, and the final report was submitted within 45 days following the test date. Testing is required once during the term of this permit to determine destruction efficiency for VOC.*	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: *B. For the oxidizer control system, the combustion chamber is:* *(a) Operated at a minimum combustion chamber temperature of 1600ºF for Willie oxidizer and 1250ºF for Sara oxidizer. These minimum temperatures were approved by the Department because the oxidizers at these temperatures were demonstrated to achieve compliance with this regulation.* *(b) Equipped with a continuous temperature monitor to record the oxidizer temperature;* *(c) Equipped with an alarm system that alerts the operator when the oxidizer combustion chamber temperature is below 1410ºF for Willie and 1250ºF for Sara; and* *(d) Equipped with an interlock system that prevents operation of the FPM installation unless the control system is operating."* **[Reference: COMAR 26.11.19.30E(2)].** *Thermocouples that monitor the temperatures to the oxidizer control system are replaced annually.* [**Reference: COMAR 26.11.03.06C].**	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: B *The following records are kept on site and are available to the Department upon request:* *(1) Permanent records, for the life of the equipment, of pertinent design data for the control device including manufacturer specifications and/or vendor guarantees for the control device;* *(2) Maintenance records of types and dates of work performed on the oxidizer control system;* *(3) Records of the combustion chamber temperature, and* *(4) Records of the results of destruction efficiency tests.* *(5) Records of the damper position and corresponding chamber temperature are kept on site for at least five years.* **(6)** *Records of annual replacement of the thermocouples onsite for at least five years. Thermocouples are changed in accordance with the annual electrical preventive maintenance plan.* **[Reference: COMAR 26.11.03.06C]**	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements:	___ Intermittent Compliance

B. Stack testing was performed on the two lead oxidizers ("Willie" and "Sara") to the Oxidizer Control System in 2016 and 2017. EPA Reference Methods used included: Reference Methods 1-4, and 25A. The stack test report was submitted to MDE. A protocol was submitted to MDE within 30 days prior to the test date, and the final report was submitted within 45 days following the test date. *Records of the thermocouple replacement are available to the Department upon request.* **[Reference: COMAR 26.11.03.06C]**	X Continuous Compliance

E. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

The table below is appropriate for reporting deviations from permit terms or conditions that have been previously reported in a six-month monitoring report (assuming that the most recent six-month monitoring report and the annual compliance certification both end on the same date). Copy this page as many times as necessary to include all such deviations. Note that you may cross-reference deviations already reported in the six-month report in the first column of the table, and leave the other columns blank, however such cross-reference must be clear and unambiguous with respect to the six-month monitoring report and the individual deviation being cross-referenced. In addition, in the first column, whether you cross-reference deviations or not, you must indicate whether each deviation is a "possible exception to compliance." If a deviation is not a possible exception to compliance, please briefly explain why it is allowed by the permit and cite the relevant permit term that provides the excuse. In addition, if there are deviations that have never been reported in writing to the permitting authority, more information than required by this table will be needed. In such cases, you must include information consistent with Section D of the six-moth monitoring report form, and indicate whether it is a "possible exception to compliance."

Permit Term for Which There is a Deviation & Whether the Deviation is a "Possible Exception to Compliance"	Emissions Units (unit IDs)	Deviation Time Periods Date (mo/dy/year) Time (hr/min) Time Zone	Written Deviation Report Submittal Date (mo/dy/year)
Table IV – 4.1 Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use	N/A	Beginning 5/17/2021 Ending 5/17/2021	7/26/2021
Table IV – 5.3 B. Control of VOC Emissions	3-2	Beginning 8/12/2021, 8:05 AM Ending 8/12/2021, 8:24 AM	1/18/2022
Section III, 4 Report of Excess Emissions and Deviations	Insignificant equipment (CH # 20043397)	Beginning 8/27/2021, 7:30 AM Ending 8/27/2021, 10:00 AM	1/18/2022
Table IV – 4.1 Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use	N/A	Beginning 10/26/2021 Ending 10/26/2021	1/18/2022
Section III, 4 Report of Excess Emissions and Deviations	Insignificant equipment (CH #1504863)	Beginning 11/17/2021, 10:20 AM Ending 11/17/2021, 10:50 AM	1/18/2022

CERTIFICATION OF PLANT-WIDE CONDITIONS

(Section III of Part 70 Operating Permit)

Indicated compliance with the following requirements of Section III of your Part 70 Operating Permit in the space provided below:

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.

COMPLIANCE STATUS:
Continuous Compliance.

2. OPEN BURNING [COMAR 26.11.07]

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

COMPLIANCE STATUS:
Continuous Compliance.
Open burning was not conducted at this site during the reporting period.

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.

COMPLIANCE STATUS:
Continuous Compliance.
This was not requested by the Department during this reporting period.

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 the State-only enforceable section:

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 attributable 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 must include the cause, dates and times of the onset and termination of the deviation, as well as the action planned or taken to reduce, eliminate, and prevent the 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 26.11.01.07C(2).

COMPLIANCE STATUS:
Continuous Compliance.
The Facility submitted timely and complete Semi-annual monitoring reports (SIXMON).

5. ACCIDENTAL RELEASE PROVISIONS [COMAR 26.11.03.03B(23)] and [40 CFR Part 68]

Should the Permittee, as defined in 40 CFR Part 68.3, become subject to 40 CFR Part 68 during the term of this permit, the owner or operator shall submit a risk management plan by the date specified in 40 CFR Part 68.10 and shall certify compliance with the requirements of 40 CFR Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

COMPLIANCE STATUS:
Continuous Compliance.
The Facility was not subject to this requirement during the reporting period.

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 will be provided to the Department.

COMPLIANCE STATUS:
Continuous Compliance.
The Department did not require testing during this reporting period.

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 Part 60, appendix A
b. 40 CFR Part 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 2, (July 1, 1992)

COMPLIANCE STATUS:
Continuous Compliance
Stack testing was performed on the two lead oxidizers “Willie” and “Sara” to the Oxidizer Control System in August 2021. EPA Reference Methods used included: Reference Methods 1-4, and 25A. The stack test reports were submitted to the MDE and showed an average destruction efficiency of 98.57% for “Willie” oxidizer and 99.20% for “Sara” oxidizer. A protocol was submitted to MDE within 30 days prior to the test date, and the final report was submitted within 45 days following the test date. Testing is required once during the term of this permit to determine destruction efficiency for VOC.

8. EMISSIONS CERTIFICATION REPORT [COMAR 26.11.01.05-1], [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 a form 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 certification form is submitted, and
   (2) Responsible for the accuracy of the emission information; and
c. The Permittee shall maintain records necessary to support the emission 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) Emission data from continuous emission monitors that are required by this 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 the 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.

COMPLIANCE STATUS:
Continuous Compliance.
The Facility submitted a timely and complete Emission Certification report.

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, emission 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 conditions 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 the 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.

COMPLIANCE STATUS:
Continuous Compliance.
The Facility submitted a timely and complete Compliance Certification Report.

10. CERTIFICATION BY RESPONSIBLE OFFICIAL [COMAR 26.11.02.02F]

All application forms, reports, and compliance certifications submitted pursuant 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."

COMPLIANCE STATUS:
Continuous Compliance.
All reports requiring certification were certified by the Plant Leader.

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
f. The results of each analysis.

COMPLIANCE STATUS:
Continuous Compliance.
Stack testing was performed on the two lead oxidizers “Willie” and “Sara” to the Oxidizer Control System in August 2021. EPA Reference Methods used included: Reference Methods 1-4, and 25A. The stack test reports were submitted to the MDE and showed an average destruction efficiency of 98.57% for “Willie” oxidizer and 99.20% for “Sara” oxidizer. A protocol was submitted to MDE within 30 days prior to the test date, and the final report was submitted within 45 days following the test date. Testing is required once during the term of this permit to determine destruction efficiency for VOC.

12. GENERAL RECORDKEEPING [COMAR 26.11.03.06C(6)]

The Permittee shall retain records of all monitoring data and support information that supports the compliance certification for a period of five 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 strip-chart recordings for continuous monitoring instrumentation;
c. Records which support the annual emissions certification; and
b. Copies of all reports required by this permit.

COMPLIANCE STATUS:
Continuous Compliance.
All records required by the Title V Permit to Operate are being maintained as required.

13. GENERAL CONFORMITY [COMAR 26.11.26.09]

The Permittee shall comply with the general conformity requirements of 40 CFR Part 93, Subpart B and COMAR 26.11.26.03.

COMPLIANCE STATUS:
N/A
This is not a federal facility and therefore does not apply.

14. ASBESTOS PROVISIONS [40 CFR Part 61, Subpart M]

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

COMPLIANCE STATUS:
Continuous Compliance.
No renovation or demolition activities requiring notification were conducted.

15. OZONE DEPLETING REGULATIONS [40 CFR Part 82, Subpart F]

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

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to §82.154 and 82.156.

b. Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
c. Persons performing maintenance, service, repairs or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
d. Persons performing maintenance, service, repairs or disposal of appliances must certify with the Administrator pursuant to §82.162.
e. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in §82.152, must comply with recordkeeping requirements pursuant to §82.166.
f. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
g. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

COMPLIANCE STATUS:
Continuous Compliance.
All applicable equipment is maintained and serviced by properly certified technicians. Refrigerant logs are maintained for each unit of 50 lbs in accordance with the regulations.

16. ACID RAIN PERMIT

Not Applicable