

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

**FINAL DETERMINATION CONCERNING A PERMIT-TO-CONSTRUCT
APPLICATION SUBMITTED BY W. R. GRACE & CO. - CONN FOR THE
INSTALLATION FOUR (4) NEW WASHPOTS AND SIXTEEN (16) NEW WASH
BASKETS IN THE MAGNAPORE PLANT AND A NEW MANUFACTURING LINE IN
THE INDUSTRIAL CATALYST OPERATIONS PLANT**

I. INTRODUCTION

The Maryland Department of the Environment (the "Department") received an application from W. R. Grace & Co.-CONN ("Grace") on June 25, 2025 for a Permit to Construct to install four (4) new washpots and sixteen (16) new wash baskets in the Magnapore Plant and a new manufacturing line in the Industrial Catalyst Operations Plant. A non-confidential addendum was received on March 31, 2026 and a confidential list of plant-wide direct fired burners was received on April 7, 2026. The proposed equipment will be located at 5500 Chemical Rd., Baltimore, MD 21226.

On July 15, 2025, a hybrid in-person and virtual informational meeting was held at St. Athanasius Church located at 4708 Prudence St, Baltimore, MD 21226 to provide interested parties opportunities to discuss with the Company and the Department the permit application and the proposed modification.

After reviewing the application and other pertinent information, the Department made a tentative determination to issue a permit-to-construct that would authorize construction of the modification as proposed in the Company's applications. A Notice of the Tentative Determination, Public Hearing, and Opportunity to Submit Written Comments was published in The Baltimore Sun on June 12, 2026 and again on June 19, 2026.

On July 6, 2026, a hybrid in-person and virtual public hearing was held at the Curtis Bay Recreation Center located at 1630 Filbert Street, Baltimore MD 21226 to provide interested parties an opportunity to comment on the Department's tentative determination and draft permit conditions, and/or to present other pertinent concerns about the proposed modification.

II. COMMENTS RECEIVED AND THE DEPARTMENT'S RESPONSE

The public comment period on the application initially expired on July 13, 2026, but was extended until September 11, 2026 following public request for a one-time, 60-day extension. The comments received at the public hearing, and those submitted in writing during the public comment period, expressed concerns about the impact of the proposed new installation on the surrounding community. The Department's responses to the comments are attached.

III. DEPARTMENT'S FINAL DETERMINATION

The Department has reviewed the application and the comments received and has determined that the proposed modification would not cause violations of any air pollution control regulations.

The Department has made a final determination to issue the permit-to-construct. A copy of the final permit to construct conditions is included on the Department's website at: <https://mde.maryland.gov/programs/permits/AirManagementPermits/Pages/WR-Grace-Permit-Meeting.aspx>

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RESPONSE TO COMMENTS
FOR
W.R. GRACE & COMPANY-CONN
5500 CHEMICAL RD.
CURTIS BAY, MD 21226**

Hearing Date: July 6, 2026
(Hybrid)

Purpose of the Hearing:

The purpose of the public hearing was to receive comment on the Maryland Department of the Environment's Tentative Determination to issue an air quality permit to construct for the for the modification of the Industrial Catalyst Operation (ICO) plant to add one (1) manufacturing line and replace two (2) hammermills that are common to all ICO manufacturing lines and expand the Magnapore and Magnapore Expansion (MAG/MGX) plants to install four (4) new washpots and up to sixteen (16) new wash baskets to be located at W.R. Grace & Company-CONN, 5500 Chemical Drive, Curtis Bay, Maryland 21226.

Attendance:

Approximately 7 members of the general public attended the hearing in person with approximately 20 attending virtually. Ms. Shannon Heafey of the Air and Radiation Administration (ARA) of the Maryland Department of the Environment (MDE) presided as Hearing Officer. Ms. Susan Nash from the Air Quality Permits Program presented the Department's statement regarding the draft permit. The Air Quality Permits Program was also represented by Mr. Matt Hafner and Ms. Suna Yi Sariscak. W.R. Grace & Company-CONN (Grace) was represented by Mr. Brent Inkelaar, Ms. Tora Newell, Ms. Madison Smith, Ms. Apple Chapman, and Mr. Dan Resca. Mr. George L. Quade from For the Record, Inc. served as the hearing's court reporter.

Comment Period:

The public comment period was open from June 12, 2026 through September 11, 2026, as MDE granted a request for a one-time 60-day extension to the initial 30-day comment period. Comments were received from the public both at the hearing and in writing during the comment period. The public hearing transcript and written comments received are enclosed with this document.

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1. Confidential Business Information (CBI)
2. Monitoring requirements lack requirements for Continuous Emissions Monitors (CEMs) or Continuous Opacity Monitors (COMs)
3. Cumulative Effects
4. Other Comments

Comments and Responses:

1. Confidential Business Information (CBI)

...A substantial amount of information from the application has been withheld as CBI making it difficult for the public to understand emissions estimates...particularly the efficiency of pollution controls.

...It is not possible to understand the emission calculations in the application and/or the underlying assumptions.

...South Baltimore residents deserve transparency and strong oversight to protect this community...

MDE Response

In addition to the public (redacted) version of the application and addendum, a confidential version of those documents was submitted to MDE. As part of the technical analysis of the application, MDE reviewed the confidential calculations and determined that the proposed modification would comply with applicable air quality regulations. Per the Md. Code Ann., Gen. Prov. §4-335 “A custodian shall deny inspection of the part of a public record that contains any of the following information provided by or obtained from any person or governmental unit a trade secret, confidential commercial information, confidential financial information, confidential geological or geophysical information”. Information redacted from the public version of the application was requested via the Public Information Act (PIA) process. Upon review by the Office of the Attorney General, except for two (2) maps, the redacted information was determined to be confidential information. The two (2) maps were provided to the PIA requestor.

2. Monitoring requirements lack requirements for Continuous Emissions Monitors (CEMs) or Continuous Opacity Monitors (COMs)

...There are multiple references in the application to stacks and vents, both of which are common locations for CEMs or COMs...however no CEMs or COMs are required...

...Continuous monitoring would be better than just a one-minute observation...

...I am very concerned with the permit talking about visual observations instead of continuous monitoring and just requiring only a one-minute visible emissions check once a day.

MDE Response

In response to concerns regarding continuous monitoring in the Curtis Bay area, the Department has incorporated several measures to help ensure facility compliance. The permit mandates dust collectors be designed to meet all applicable limits. Additionally, initial [EPA Method 9](#) observations are required to ensure the installation is operating as designed.

For on-going compliance, daily one-minute visible emission observations are required to ensure timely responses to any equipment malfunctions. Furthermore, Grace must follow manufacturer recommendations for routine maintenance of equipment, including dust collectors, as part of Department-reviewed operations and maintenance plans. There are no Federal or State applicable requirements for the use of CEMS or COMS to monitor compliance for this type of operation.

3. Cumulative Effects

...the coal plant very close to this facility has been ordered to remain operating beyond its useful economic life and is also a major source of pollution in the area...this permit is increasing overall particulate matter which is the major problem with the coal pier...

...I urge MDE to look beyond this project alone and consider the cumulative impacts and burdens on the residents that live in this community.

...Maryland Department of the Environment and the Governor are in climate denial...and because of that the people that live in this community are going to have an increase in particulate matter when this is awarded.

...I do believe that this [permit] has been done in a way that meets the scientific rigor of permits, but that doesn't necessarily mean that these permits are fair to communities that are already overburdened.

MDE Response

Grace has made a voluntary commitment to mitigate overall site increases of particulate matter and nitrogen oxides from this project, and the permit requires emissions reductions elsewhere at the facility.

In addition to meeting all minimum applicable State and federal air quality requirements, the air quality permit to construct requires Grace to permanently shut down equipment and install low emissions equipment as follows:

(1) Part C(7) and Part C(8) of the permit list: the equipment associated with the CAO Plant and the AEO Plant Spheres to be permanently removed from service prior to commencing operation of any new equipment authorized by the permit.

(2) Part C(11) of the permit requires the ICO Plant Line 3 spray dryer (EST-35801) to be equipped with an ultra-low NOx burner that is designed to meet 10 ppm at 3% oxygen.

(3) The Department has received an application to upgrade one (1) baghouse; an application to upgrade another baghouse is planned in the future. These upgrades are anticipated to reduce particulate emissions.

After accounting for the increased emissions from the new equipment authorized by the permit, and the reductions from these actions to shut down and replace other equipment, total NOx emissions will decrease by 1.12 tons per year compared to current operations. Following the

planned baghouse upgrades, Grace will achieve close to a net zero increase in particulate matter emissions.

Grace has provided additional information regarding their mitigation efforts, which can be found here [Grace Project Outreach](#).

4. Other Comments

...this community is labeled a sacrifice zone...MDE and the Governor need to put the community first and stop putting industry first.

MDE Response

MDE acknowledges that past decisions by local and state governments have contributed to the environmental challenges currently experienced by residents in Curtis Bay and South Baltimore. MDE is actively increasing environmental enforcement across vulnerable communities statewide. Through emission regulations, increased announced and unannounced facility inspections, and enhanced public participation, the Department is fully utilizing our current authority to support overburdened communities. MDE recognizes that reversing historical practices and accumulated environmental harms will require sustained, long-term effort.