AIR AND RADIATION ADMINISTRATION
DRAFT PART 70 OPERATING PERMIT

DOCKET # 24-013-0013

COMPANY: Congoleum Corporation

LOCATION: 2700 Emory Road
Finksburg MD 21048

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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 Congoleum Corporation located in Finksburg, MD. The facility includes three natural gas fired boilers rated at 59 MMBtu, one natural gas fired boiler rated at 33 MMBtu each of which use no. 2 fuel as a backup, and a bulk receiving system which includes two storage silos, two baghouses and a pneumatic transfer station.

The applicant is represented by:

Mr. Jarret Sproull, EHS Director
Congoleum Corporation
3500 Quakerbridge Road
Mercerville, NJ 08619

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 is 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.

CONGOLEUM CORPORATION
2700 EMORY ROAD, FINKSBURG, MD 21048
PART 70 OPERATING PERMIT NO. 24-013-00013
DRAFT PART 70 OPERATING PERMIT FACT SHEET

BACKGROUND

Congoleum Corporation (Congoleum), located at 2700 Emory Road in Finksburg, Maryland 21048 (Carroll County), is a felt-flooring product manufacturer. The felt is then used by a subsidiary as a backing to manufacture the final flooring product. The Standard Industrial Classification Code (SIC) for Congoleum Corporation is 2661.

The raw materials for the felt manufacturing process enter Congoleum's bulk receiving system, which consists of two (2) storage silos, a pneumatic transfer system and two (2) baghouses for particulate matter emission control. The raw materials are weighed according to specifications and then conveyed to a mixer for mixing with water. The mixture is then transferred to a 210" felt machine, which consists of the forming area, press section, and dryer section. Steam is used to dry the product. The felt product is then date-stamped, rolled, trimmed, and readied for shipping. Materials passing through the felt machine are wet with water and then dried by heat transfer from steam. The two (2) silos [Multi-Zone Row-Pulse dust collector with pulse timer (Serial #:82-2010-325)] are connected wherein one baghouse is situated on top of one silo and is utilized only during receipt of limestone raw material. The displaced air is filtered through this bag house. The other baghouse is positioned on top of a weigh bin and used for each batch of material that is blended. The drop of limestone raw material on the weigh bin causes the material to be displaced in the air and thus, this baghouse controls the particulates from this process. Two (2) baghouses, #3 Unifilter Model B are used on the limestone silos to control particulate matter from the offloading of the material and the blending operation in which particulates can be displaced inside a weigh bin. They were installed in June 1982 and has the control efficiency of 99.9% Particulates (PM).

Four (4) boilers provide the drying steam. There are three identical Riley boilers, each rated at 59 MMBtu/hr heat input and burn natural gas (105.15 MMCF annually) with No. 2 fuel oil (500 gallons annually) as backup. These three (3) boilers were all installed in 1948. The fourth boiler **[MDE Reg. No. 5-0006]** is a natural gas fired Keeler boiler rated at 33 MMBtu/hr heat input with No. 2 fuel oil as backup. The Keeler boiler was installed in 1941. The boiler shares a common stack with the other two (2) boilers located in the same room. The stack is approximately 150 ft high and has a 108 in (or 9 ft) diameter. The exhaust rate potential is about 1,600 CFM at 600 degrees Fahrenheit. The Keeler boiler is currently out-of-service. The boiler has been inspected and corrective actions have been determined. Thus, Congoleum wishes to maintain this boiler in the permit since it has the potential to be put back into service. The four boilers have not been modified or reconstructed since the installation and are therefore not subject to Federal New Source Performance Standards (NSPS) of 40 CFR, Part 60, Subpart

Dc which applies to industrial/commercial boilers installed/modified, or reconstructed after 1989. The four (4) boilers discharge to one common stack, provided with an American Blower Corporation multi-cyclone for particulate matter control.

The major source thresholds for triggering Title V permitting requirements for Carroll County are the potential to emit 25 tons per year (TPY) of NOx, 25 TPY of VOC, or 100 TPY of any other criteria pollutant. Although the actual NOx emissions from Congoleum are lower than 25 TPY, the estimate for potential to emit exceeds the major source threshold. As a result, Congoleum Corporation is required to obtain a Part 70 operating permit under COMAR 26.11.03.01

Congoleum Corporation prepared a Part 70 (Title V) renewal permit application, and it was received by the Department on June 12, 2024. An administrative completeness review was conducted, and the application was deemed to be administratively complete. A completeness determination letter was sent to Congoleum Corporation on June 18, 2024 granting this facility an application shield.

The primary air emissions sources at the Congoleum Corporation originate from its boilers with a minor contribution of particulate matter originating from the felt flooring material production process. The following table summarizes the actual estimated emissions from Congoleum Corporation submitted through the annual certification reports. The emissions shown for 2023 are based on its emission calculations shown in the Title V application.

Table 1: Actual Emissions

Year	NOx (TPY)	SOx (TPY)	PM10 (TPY)	CO (TPY)	VOC (TPY)
2023	5.26	0.03	0.19	4.41	0.29
2022	5.75	0.04	0.33	4.84	0.32
2021	7.66	0.05	0.36	6.44	0.42
2020	6.03	0.04	0.35	5.06	0.33
2019	6.50	0.48	0.60	0.00	0.36
2018	4.83	0.56	0.61	4.06	0.27

GREENHOUSE GAS (GHG) EMISSION STATEMENT

Congoleum Corporation emits the following greenhouse gases (GHGs) related to Clean Air Act requirements: carbon dioxide and methane. These GHGs originate from various processes (i.e., boiler operations). 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 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 GHG emissions from Congoleum Corporation submitted through emission certification reports:

Table 2: Actual GHG Emissions Summary

Year	CO_2 (TPY)	CH_4 (TPY)	N_2O (TPY)
2023	6,310	0.12	0.11
2022	6,917	0.13	0.13
2021	9,193	0.18	0.17
2020	7,235	0.14	0.13
2019	5,709	0.16	0.15
2018	5,437	0.15	0.14

CAM Analysis

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

Congoleum Corporation operates a baghouse for the control of particulate matter emissions, which was installed in June 1982. However, Congoleum Corporation is not a major source of particulate emissions, and the control system is not required to achieve compliance with emission standards.

EMISSION UNIT IDENTIFICATION

The following emission units have been identified at Congoleum as being subject to the Title V permitting requirements and having applicable requirements:

Table 3: Emission Unit Identification

MDE Registration Number	Emissions Unit Number	Emissions Unit Description	Date of Registration
5-0003	EU-03	One (1) Riley boiler fueled by natural gas and No. 2 oil as backup, each rated at 59 MMBTU/hr.	1948
5-0004	EU-04	One (1) Riley boiler fueled by natural gas and No. 2 oil as backup, each rated at 59 MMBTU/hr.	1948
5-0005	EU-05	One (1) Riley boiler fueled by natural gas and No. 2 oil as backup, each rated at 59 MMBTU/hr.	1948
5-0006	EU-06	One (1) Keeler boiler fueled by natural gas and No. 2 oil as backup, rated at 33 MMBTU/hr.	1941
9-0024	EU-07	Bulk receiving system equipped with two (2) storage silos, pneumatic transfer station, and two (2) baghouses.	June 1982

There are no particulate matter emissions, and no visible emissions released from the felt machine. Therefore, the felt machine is listed in Section V "Insignificant Activities" of the Title V permit. The felt machine was installed in June 1974.

AN OVERVIEW OF THE PART 70 PERMIT

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 AND TECHNICAL REVIEW/COMPLIANCE METHODOLOGY

Emission Unit: EU-3, EU-4, EU-5, and EU-6
Three (3) Riley boilers fueled by natural gas and No. 2 oil as backup, each rated at 59 MMBTU/hr **[MDE Reg. No. 5-0003, 5-0004, 5-0005]**, and one (1) Keeler boiler fueled by natural gas and No. 2 oil as backup, rated at 33 MMBTU/hr; **[MDE Reg. No. 5-0006]**.

The four (4) boilers, running on natural gas with No. 2 fuel oil as backup fuel, were installed before 1989 and have not been modified or reconstructed and as such they do not meet the NSPS applicability requirements. The Permittee burns No.2 fuel oil during periods of interrupted natural gas service. Under interruptible gas service the boilers are not subject to a particulate standard when burning No. 2 fuel oil.

The Permittee will no longer use No. 6 fuel oil as a backup fuel for the boilers.

These boilers are subject to the following requirements:

Applicable Standards and Limits

A. Control of Visible Emissions

COMAR 26.11.09.05A(2) – Fuel Burning Equipment.
"In Area III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity."

COMAR 26.11.09.05A(3) – Exceptions.
"Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, start up, or adjustments or occasional cleaning of control equipment if:

(1) The visible emissions are not greater than 40 percent opacity; and
(2) 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, and verify no visible emissions are released while burning No. 2 fuel oil. A visual observation for a 6-minute period shall be performed once for each 168 hours that the boiler burns oil or at a minimum of once per year. If the boilers do not burn any oil during the year, this requirement is waived.

If visible emissions are observed, the Permittee shall inspect the combustion system and boiler operations; perform all necessary adjustments and/or repairs to the boiler within 48 hours, so that visible emissions are eliminated; document in writing the results of the inspections, adjustments and/or repairs to the boiler; and after 48 hours, if the required adjustments and/or repairs had not eliminated the visible emissions, and perform Method 9 observations once daily for 18 minutes until corrective actions have eliminated the visible emissions.

The Permittee shall maintain an operation manual and prevention maintenance plan on site; maintain a record of the maintenance performed that relates to combustion performance, and maintain a record of the hours that No. 2 fuel oil was burned and of the visible emissions observations performed. All of these documents should be available to the Department's representative upon request. The Permittee shall report incidents of visible emissions in accordance with Plant Wide Conditions, Chapter 4 – "Report of Excess Emissions and Deviations".

Rationale for Periodic Monitoring:
Boilers that burn natural gas rarely have visible emissions if properly operated and maintained. If any visible emissions occur it will be when burning No. 2 fuel oil. Since the Permittee has a lot of reserve capacity with four (4) boilers, if visible emissions occur on one boiler, it can be taken offline and replaced with one of the reserve boilers. Also, having reserve capacity the Permittee has more than sufficient time to perform preventive maintenance on the boilers.

B. Control of Particulate Matter
COMAR 26.11.09.06B(6) - Exceptions.
(a) Fuel burning equipment burning gas with an interruptible gas service is exempt from the provisions of §B(1) and (2).
"Interruptible gas service" means a gas service negotiated between the user and a utility company under the jurisdiction of the Maryland Public Service Commission in which the utility company reserves the right to interrupt the gas supply after notification or to limit the gas supply by automatic interruption.

Compliance Demonstration:
The boilers are dual fired with natural gas and No. 2 fuel oil. The facility is on interruptible service; therefore the boilers are exempt from the PM standard in Table 1. The Permittee shall submit a current copy of the interruptible service contract (or equivalent) to the Department upon request.

C. Control of Sulfur Oxides
COMAR 26.11.09.07A(2)(B)
"A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of which otherwise exceeds the following limitations:
(2) In Areas III and IV: (b) distillate fuel oils, 0.3 percent."

Compliance Demonstration:
The Permittee shall obtain a certification from the fuel supplier indicating that the oil complies with the limitation on the sulfur content of the fuel oil. This certification will be used to verify compliance. The Permittee shall maintain records of fuel supplier's certification and shall make records available to the Department upon request.

Rationale for Periodic Monitoring:
This compliance strategy is similar to the requirement for boilers subject to New Source Performance Standards, 40CFR Part 60, Subpart Dc.

D. Control of Nitrogen Oxides
COMAR 26.11.09.08B(5) – Operator Training.

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

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

COMAR 26.11.09.08E – Requirements for Fuel-Burning Equipment with a rated Heat Input Capacity of 100 Million Btu Per Hour or Less.
"A person who owns or operates fuel-burning equipment with a rated heat input capacity of 100 Million Btu per hour or less shall:
(1) Submit to the Department an identification of each affected installation, the rated heat input capacity of each installation, and the type of fuel burned in each;

(2) Perform a combustion analysis for each installation at least once each year and optimize combustion based on the analysis;

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

(4) Once every 3 years, require each operator of the installation to attend operator training programs on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and

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

Compliance Demonstration:
The Permittee shall perform a combustion analysis once a year. The Permittee shall optimize combustion based on the annual combustion analysis. [Authority: COMAR 26.11.09.08E(2)]. The Permittee shall maintain records of the results of the annual combustion analysis and record of training program attendance for each operator on site. **[COMAR 26.11.09.08E(5)]** The Permittee shall submit:

(1) The results of combustion analysis to the department and the EPA upon request, and **[COMAR 26.11.09.08E(3)]**

(2) A record of training program attendance for each operator to the Department upon request. **[COMAR 26.11.09.08E(5)]**

E. Operational Limitation
The Permittee shall burn either natural gas or No. 2 fuel oil in the boilers unless the Permittee applies for and receives an approval or permit from the Department to burn alternate fuels. **[COMAR 26.11.02.09A]**

Compliance Demonstration:
The Permittee shall maintain and submit records of the quantity and type of fuels burned with the annual emission certification report. **[COMAR 26.11.02.19C(1)(C)]** The Permittee shall submit records of the quantity and types of fuels burn with the annual Emission Certification Report. **[COMAR 26.11.03.06C]**

Emission Unit: EU-7
Bulk Receiving System equipped with two (2) baghouses. **[MDE Reg. No. 9-0024]**.

Applicable Standards and limits

A. Control of Visible Emissions

COMAR 26.11.06.02C(2) – Visible Emissions Standards.
"In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."

COMAR 26.11.06.02A(2) – General Exceptions.
The visible emissions standards in §C of this regulation do not apply to emissions during 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 1-minute visual observation of the baghouse exhaust to look for visible emissions. The visual observation must be conducted while the bulk receiving system is in operation and the baghouse is operating. 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 bughouse exhaust. If visible emissions are observed during the quarterly visual observations, the Permittee must resume the observation of the baghouse exhaust on a monthly basis and maintain the schedule until no visible emissions are observed in six consecutive monthly visual observations. If visible emissions are observed during a monthly observation, the Permittee must inspect baghouse for the cause of visible emission and perform necessary adjustments or repairs within 24-hours prior to operating the raw materials. If visible emissions have not been eliminated, the Permittee shall perform daily 18-minute visual observation for opacity in accordance with EPA Reference Method 9 when the raw material operating the bulk receiving system. The Permittee shall maintain the results of visual observations. The Permittee shall report incidents of visible emissions in accordance with Section III – Plant Wide Conditions, Chapter 4 "Report of Excess Emissions and Deviations."

Rationale for Periodic Monitoring Strategy:
A baghouse in this type of service rarely has visible emissions. With preventive maintenance that is required by this permit to control particulate matter, it is unlikely that a malfunction will occur that causes visible emissions.

B. Control of Particulate Matter
COMAR 26.11.06.03B(2)(a) – Particulate Matter from Confined Sources.
"A person may not cause or permit to be discharged into outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7mg/dscm)."

Compliance Demonstration:
The Permittee shall maintain the preventive maintenance plan for the baghouses that describes the maintenance activity and time schedule for completing each activity. The Permittee shall review and revise the plan if visible emissions are observed in the exhaust from the baghouses. The Permittee shall perform maintenance activities within the time frame 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 record of the dates and description of maintenance activity performed. The Permittee shall maintain records of the baghouse malfunctions and the corrective actions taken to bring the baghouse into proper operation.

Rationale for Periodic Monitoring Strategy:
The baghouse is designed to achieve an emission rate of 0.01 gr/dscf. If the baghouse is properly maintained, it will continue to achieve its designed efficiency.

The Permittee developed a preventative maintenance plan as required by the initial Part 70 permit. Visible emissions have never been observed by the Department during inspections. The Department has never received any complaints from third parties about visible emissions from the baghouses. The facility has never reported any malfunctions of the baghouses. The current strategy has been successful to maintain compliance for the past 10 years so no change in monitoring strategy will be made at this time.

COMPLIANCE SCHEDULE

None

TITLE IV - ACID RAIN

The Congoleum Corporation is not subject to any Acid Rain requirements.

TITLE VI - OZONE DEPLETING SUBSTANCES

The Congoleum Corporation shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.

SECTION 112 (r) - ACCIDENTAL RELEASE

The Congoleum Corporation is not subject to the requirements under Section 112(r) - Accidental Release.

PERMIT SHIELD

The Congoleum Corporation did not request a permit shield for its facility operation.

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) 3 Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

One (1) 125 kW (167 HP) Caterpillar Olympian (Model D12P52) diesel powered emergency generator serving the wastewater plant

One (1) 3.5kW Subaru Powermate (Model 3500 CX3500) natural gas powered serving the production plant

One (1) 212 HP diesel powered Caterpillar (Model Olympian) Emergency Generator for the Wastewater Treatment Plant (installed in 2004).

The following requirements apply to the 125 kW (167 HP) Caterpillar Olympian (Model D12P52) diesel powered emergency generator; and one (1) 212 HP diesel powered Caterpillar (Model Olympian) Emergency Generator for the Wastewater Treatment Plant (installed in 2004):

Applicable Standards and Limits

A. National Emission Standards for Hazardous Air Pollutants

"By May 3, 2013, "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 2b to this subpart that apply to you." **[Reference: 40 CFR §63.6603(a), 63.6605, 63.6612, 63.6620, 63.6625, 63.6630, 63.6640, 63.6645, 63.6655]**

Compliance Demonstration

The Permittee shall comply with operating and monitoring restrictions in accordance with **40 CFR §63.6603(a), §63.6625(h), and Table 2d to 40 CFR 63, Subpart ZZZZ**. The Permittee shall comply with recordkeeping requirements in accordance with 40 CFR §63.6655(a), (b), and (d). The Permittee shall comply with reporting requirements in accordance with 40 CFR §63.6603(a), and Table 2d.

B. Control of Visible Emissions

COMAR 26.11.09.05E – **Visible Emissions Limits for 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) 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) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:
    (i) Engines that are idled continuously when not in service: 30 minutes;
    (ii) All other engines: 15 minutes.
(c) Section E(2) and (3) does not apply while maintenance, repair, or testing is being performed by qualified mechanics."

Compliance Demonstration
The Permittee shall properly operate and maintain the horizontal grinders in a manner to minimize visible emissions. **[Reference: COMAR 26.11.03.06C]** The Permittee shall properly operate and maintain engines in a manner to minimize visible emissions. **[Reference: COMAR 26.11.03.06C]**

C. Control of Sulfur Oxides Emissions
COMAR 26.11.09.07A(1) – **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:

(c) Distillate fuel oils, 0.3 percent;"

Note: The Permittee must comply with sulfur content limitations for fuel (15 ppm) as stated in 40 CFR 63.6604.

Compliance Demonstration
The Permittee shall obtain a certification form the fuel supplier indicating that the fuel oil complies with the limitation on sulfur content of the fuel oil. **[Reference: COMAR 26.11.03.06C]** The Permittee shall retain annual fuel supplier certifications stating that the fuel oil is in compliance with this regulation must be maintained for at least five years. **[Reference: COMAR 26.11.09.07C]** The Permittee shall report annual fuel supplier certification to the Department upon request. **[Reference: COMAR 26.11.09.07C]**

D. Operational Limit

(1) The Permittee must operate and maintain the engine according to the manufacturer's emission-related written instructions or the Permittee must develop their 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. **[Reference: 40 CFR §63.6605, §63.6625(e), §63.6625(f), §63.6640, and Table 2d]**

(2) The Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d of 40 CFR 63, Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d. 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 Permittee is not required to change the oil. If any of the limits are exceeded, the Permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the Permittee must change the oil within 2 business days or before commencing operation, whichever is later. The Permittee 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. **[Reference: 40 CFR §63.6625(i)]**

(3) In accordance with 40 CFR §63.6625(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." **[Reference: 40 CFR §63.6625(h)]**

Compliance Demonstration

The Permittee must operate and maintain the engine according to the manufacturer's emission-related written instructions or the Permittee must develop their 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. **[Reference: 40 CFR §63.6605, §63.6625(e), §63.6625(f), §63.6640, and Table 2d]** The Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d of 40 CFR 63, Subpart ZZZZ. **[Reference:**

40 CFR §63.6625(i)] In accordance with 40 CFR §63.6625(h), the Permittee shall 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. **[Reference: 40 CFR §63.6625(h)]**

Note: There is an additional state-only enforceable requirement that applies to the generators which is found in Section VI – State-only Requirements of the permit.

(2) 16 *Space heaters utilizing direct heat transfer and used solely for* comfort heat (2 – inspector shop, 1 - electric shop, 1- limestone shack, 1 – women's bathroom, 2 – main laboratory, and 4 – boiler room);

COMAR 26.11.09.07A(2)(b), which establishes that the Permittee may not burn, sell, or make available for sale any distillate fuel with a sulfur content by weight in excess of 0.3 percent.;

(3) 1 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;

(4) 4 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

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

(a) COMAR 26.11.19.09D(2)(b), which establishes that the Permittee shall not use any VOC degreasing material that exceeds a vapor pressure of 1 mm Hg at 20 ° C;

(b) COMAR 26.11.19.09D(3)(a—d), which requires that the Permittee implement good operating practices designed to minimize spills and evaporation of VOC degreasing material. These practices, which shall be established in writing and displayed such that they are clearly visible to operators, shall include covers (including water covers), lids, or other methods of minimizing evaporative losses, and reducing the time and frequency during which parts are cleaned;

(c) COMAR 26.11.19.09D(4), which prohibits the use of any halogenated VOC for cold degreasing.

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

(a) Monthly records of the total VOC degreasing materials used; and

(b) Written descriptions of good operating practices designed to minimize spills and evaporation of VOC degreasing materials.

(5) 12 Equipment for drilling, carving, cutting, routing, turning, sawing, planning, spindle sanding, or disc sanding of wood or wood products;

(6) X Containers, reservoirs, or tanks used exclusively for:

37 Storage of butane, propane, or liquefied petroleum, or natural gas (3 – propane tank, 1 – vehicle shop, 2 – Laboratory, 8 – castor pits, 1 – Bldg No. 60, 9 – Machine #5, 9 – warehouse, 2 – boiler house);

3 Storage of lubricating oils (all 3 storage areas have capacity < 10,568 gallons);

2 Storage of numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;

4 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;

(7) 6 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;

(8) 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;

(9) 1 Potable water treatment equipment, not including air stripping equipment;

(10) 7 Grain, metal, or mineral extrusion presses;

(11) 5 Laboratory fume hoods and vents; (2 – main lab, 1 – portable unit, 1 – process laboratory, 1 – wet pulp laboratory);

(12) Emission units, not listed in this section, with a potential to emit less than the “de minimus” levels listed in COMAR 26.11.02.10X.

1 Felt paper machine with hydropulper and scrubber;
1 Unloading system;
1 Transfer system;
1 Wastewater treatment system.

STATE-ONLY ENFORCEABLE CONDITIONS

The Permittee is subject to the following State-only enforceable requirements:

1. Applicable Regulations:

   (A) COMAR 26.11.06.08 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

CONGOLEUM CORPORATION
2700 EMORY ROAD
FINKSBURG, MD 21048
DRAFT PART 70 OPERATING PERMIT NO. 24-013-00013

SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

Congoleum Corporation (Congoleum), located at 2700 Emory Road in Finksburg, Maryland 21048 (Carroll County), is a felt-flooring product manufacturer. The felt is then used by a subsidiary as a backing to manufacture the final flooring product. The Standard Industrial Classification Code (SIC) for Congoleum Corporation is 2661.

The raw materials for the felt manufacturing process enter Congoleum's bulk receiving system, which consists of two (2) storage silos, a pneumatic transfer system and a baghouse for particulate matter emission control. The raw materials are weighed according to specifications and then conveyed to a mixer for mixing with water. The mixture is then transferred to a 210" felt machine, which consists of the forming area, press section, and dryer section. Steam is used to dry the product. The felt product is then date stamped, rolled, trimmed, and ready for shipping. Materials passing through the felt machine are wet with water and then dried by heat transfer from steam.

Four (4) boilers provide the drying steam. There are three identical Riley boilers, each rated at 59 MMBtu/hr heat input and burn natural gas with No. 2 fuel oil as backup. These three (3) boilers were all installed in 1948 in the same building. The fourth boiler is a Keeler boiler rated at 33 MMBtu/hr heat input that burns natural gas with No. 2 fuel oil as backup. The Keeler boiler was installed in 1941. The four boilers have not been modified or reconstructed since the installation, and are therefore not subject to Federal New Source Performance Standards of 40 CFR, Part 60, Subpart Dc which applies to industrial/commercial boilers installed/modified, or reconstructed after 1989. The four (4) boilers discharge to one common stack, which has an American Blower Corporation multi-cyclone for particulate matter control.

The major source thresholds for triggering Title V permitting requirements are the potential to emit of 25 tons per year (TPY) of NOx, 25 TPY of VOC, or 100 TPY of any other criteria pollutant. Although the actual NOx emissions from Congoleum are lower than 25 TPY, the estimate for potential to emit exceeds the major source threshold. As a result, Congoleum Corporation is required to obtain a Part 70 operating permit under COMAR 26.11.03.01

Congoleum Corporation prepared a Part 70 (Title V) renewal permit application, and it was received by the Department on August 28, 2018. An administrative completeness review was conducted, and the application was deemed to be administratively complete. A completeness determination letter was sent to Congoleum Corporation on June 18, 2024, granting this facility an application shield.

The primary air emissions sources at the Congoleum Corporation originate from its boilers with a minor contribution of particulate matter originating from the felt flooring material production process. The following table summarizes the actual estimated emissions from Congoleum Corporation submitted through the annual certification reports. The emissions shown for 2023 are based on its emission calculations shown in the Title V application.

Table 1: Actual Emissions

Year	NOx (TPY)	SOx (TPY)	PM10 (TPY)	CO (TPY)	VOC (TPY)
2023	5.26	0.03	0.19	4.41	0.29
2022	5.75	0.04	0.33	4.84	0.32
2021	7.66	0.05	0.36	6.44	0.42
2020	6.03	0.04	0.35	5.06	0.33
2019	6.50	0.48	0.60	0.00	0.36
2018	4.83	0.56	0.61	4.06	0.27

There are no particulate matter emissions, and no visible emissions released from the felt machine. Therefore, the felt machine is listed in Section V “Insignificant Activities” of the Title V permit. The felt machine was installed in June 1974.

2. FACILITY INVENTORY LIST

The following emission units have been identified at Congoleum as being subject to the Title V permitting requirements and having applicable requirements.

Table 2: Emission Unit Identification

MDE Registration Number	Emissions Unit Number	Emissions Unit Description	Date of Registration
5-0003	EU-03	One (1) Riley boiler fueled by natural gas and No. 2 oil as backup, each rated at 59 MMBTU/hr	1948
5-0004	EU-04	One (1) Riley boiler fueled by natural gas and No. 2 oil as backup, each rated at 59 MMBTU/hr.	1948
5-0005	EU-05	One (1) Riley boiler fueled by natural gas and No. 2 oil as backup, each rated at 59 MMBTU/hr.	1948
5-0006	EU-06	One (1) Keeler boiler fueled by natural gas and No. 2 oil as backup, rated at 33 MMBTU/hr.	1941
9-0024	EU-07	Bulk receiving system equipped with two (2) storage silos, pneumatic transfer station, and two (2) baghouses.	June 1982

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

c. 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.

d. 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.

e. 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 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

e. The emissions resulting from those changes.

f. Changes that qualify under COMAR 26.11.03.19 are not subject to the requirements for Part 70 revisions.

g. The Permittee shall include each off-permit change under COMAR 26.11.03.19 in the application for renewal of the part 70 permit.

h. The permit shield in COMAR 26.11.03.23 does not apply to off-permit changes made under COMAR 26.11.03.19.

i. 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]

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 performing maintenance, service, repairs or disposal of appliances shall certify with the Administrator pursuant to 40 CFR 82.162.

e. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.166.

f. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.

g. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

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, recordkeeping 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. [Authority: COMAR 26.11.03.06C(5)(g)]

The Congoleum Corporation is currently subject to the following requirements:

Table IV -1	
1.0	**Emissions Unit Number(s) – EU-3, EU-4, EU-5, and EU-6** **EU-3, EU-4, EU-5**: Three (3) Riley boilers fueled by natural gas and No. 2 oil as backup, each rated at 59 million Btu per hour heat input, all installed in 1948. **[MDE ARA Reg. No. 5-0003 thru 5-0005]** EU-6: One (1) Keeler boiler fueled by natural gas and distillate (No. 2) oil rated at 33 million Btu per hour heat input, installed in 1941. **[MDE ARA Reg. No. 5-0006]**
1.1	**Applicable Standards/Limits:** **A. Control of Visible Emissions** **COMAR 26.11.09.05A(2)** – Fuel Burning Equipment. "In Area III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity."' **COMAR 26.11.09.05A(3)** – Exceptions. "Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, start up, or adjustments or

Table IV -1

occasional cleaning of control equipment if:

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

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

B. Control of Particulate Matter

COMAR 26.11.09.06B(6) – Exceptions.

(a) Fuel burning equipment burning gas with an interruptible gas service is exempt from the provisions of §B(1) and (2).

"Interruptible gas service" means a gas service negotiated between the user and a utility company under the jurisdiction of the Maryland Public Service Commission in which the utility company reserves the right to interrupt the gas supply after notification or to limit the gas supply by automatic interruption upon determining that gas supplies are inadequate for normal distribution. **[Reference: COMAR 26.11.09.01B(7)]**

C. Control of Sulfur Oxides

COMAR 26.11.09.07A – Sulfur Content Limitations for Fuel.

"A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: (2) In Areas III and IV: (b) distillate fuel oils, 0.3 percent."

D. Control of Nitrogen Oxides

COMAR 26.11.09.08B(5) – Operator Training.

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

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

COMAR 26.11.09.08E – Requirements for Fuel-Burning Equipment with a rated Heat Input Capacity of 100 Million Btu Per Hour or Less.

"A person who owns or operates fuel-burning equipment with a rated heat input capacity of 100 Million Btu per hour or less shall:

Table IV -1

	(1) Submit to the Department an identification of each affected installation, the rated heat input capacity of each installation, and the type of fuel burned in each; (2) Perform a combustion analysis for each installation at least once each year and optimize combustion based on the analysis; (3) Maintain the results of the combustion analysis at the site for at least 2 years and make this data available to the Department and the EPA upon request; (4) Once every 3 years, require each operator of the installation to attend operator training programs on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and (5) Prepare and maintain a record of training program attendance for each operator at the site and make these records available to the Department upon request." **E. Operational Limitations** The Permittee shall maintain an interruptible gas service with a utility company under the jurisdiction of the Maryland Public Service Commission and shall combust in the boilers natural gas as the primary fuel and distillate (No. 2) oil, as backup fuels during periods of interruption or during periods of routine maintenance or testing. **[COMAR 26.11.02.09A]**
1.2	**Testing Requirements:** **A. Control of Visible Emissions** See Monitoring and Record Keeping Requirements. **B. Control of Particulate Matter** See Reporting Requirements. **C. Control of Sulfur Oxides** See Monitoring and Record Keeping Requirements. **D. Control of Nitrogen Oxides** See Monitoring and Record Keeping Requirements. **E. Operational Limitations** See Monitoring and Record Keeping Requirements.

Table IV -1

1.3 **Monitoring Requirements:**

A. Control of Visible Emissions

The Permittee shall:

(1) Properly operate and maintain the boilers in a manner to prevent visible emissions; and

(2) Verify no visible emissions when burning No. 2 fuel oil. The Permittee shall perform a visual observation for a 6-minute period once for each 168 hours that the boiler burns oil or at a minimum of once per year. If the Permittee does not burn any fuel oil during a year, this requirement is waived.

The Permittee shall perform the following, if emissions are visible:

(a) Inspect combustion system and boiler operations,

(b) Perform all necessary adjustments and/or repairs to the boiler within 48 hours, so that visible emissions are eliminated;

(c) Document in writing the results of inspections, adjustments and/or repairs to the boiler; and

(d) After 48 hours, if the required adjustments and/or repairs had no eliminated the visible emissions, perform Method 9 observations once daily for 18 minutes until corrective actions have eliminated the visible emissions. **[COMAR 26.11.03.06C]**

B. Control of Particulate Matter

See Reporting Requirements.

C. Control of Sulfur Oxides

The Permittee shall obtain a certification from the fuel supplier indicating that the oil complies with the limitation on the sulfur content of the oil. **[COMAR 26.11 03.06C]**

D. Control of Nitrogen Oxides

The Permittee shall optimize combustion based on the annual combustion analysis. **[COMAR 26.11.09.08E(2)]**

E. Operational Limitations

See Record Keeping and Reporting Requirements.

Table IV -1

1.4 **Record Keeping Requirements:**

In accordance with COMAR 26.11.03.06C(5)(G), all records must be maintained for a period of 5 years.

A. Control of Visible Emissions
The Permittee shall:

(1) Maintain an operation manual and prevention maintenance plan on site;

(2) Maintain a record of the maintenance performed that relates to combustion performance;

(3) Maintain a log of visible emissions observations performed and make it available to the Department's representative upon request;

(4) Maintain a record of the hours that No. 2 fuel oil is burned. **[COMAR 26.11.03.06C]**

B. Control of Particulate Matter
See Reporting Requirements.

C. Control of Sulfur Oxides
The Permittee shall maintain records of fuel supplier's certification and shall make records available to the Department upon request. **[COMAR 26.11.03.06C]**

D. Control of Nitrogen Oxides
The Permittee shall maintain:

(1) Records of the annual combustion analysis on site.

(2) Records of training program attendance for each operator at the site, and make these records available to the Department upon request. **[Reference: COMAR 26.11.09.08E(5)]**

E. Operational Limitations
The Permittee shall maintain records of the quantity and types of fuel burned for the manufacturing of felt product. **[Reference: COMAR 26.11.02.19C(1)(c)]**

Table IV -1

1.5 **Reporting Requirements:**

A. Control of Visible Emissions
The Permittee shall report incidents of visible emissions in accordance with Section III – Plant Wide Conditions, Chapter 4 “Report of Excess Emissions and Deviations” from the current operating permit.

B. Control of Particulate Matter
The Permittee shall submit a copy of the current contract for interruptible service (or equivalent) to the Department upon request. **[COMAR 26.11.03.06C]**

C. Control of Sulfur Oxides
The Permittee shall report fuel supplier certification to the Department upon request. **[Reference: COMAR 26.11.09.07C]**

D. Control of Nitrogen Oxides
The Permittee shall submit:

(1) The results of combustion analysis to the department and the EPA upon request. **[Reference: COMAR 26.11.09.08E(3)]**

(2) A record of training program attendance for each operator to the Department upon request. **[Reference: COMAR 26.11.09.08E(5)]**

E. Operational Limitations
The Permittee shall submit records of the quantity and type of fuels burn with the annual emission certification report. **[Reference: COMAR 26.11.02.19]**

Table IV -2	
2.0	**Emissions Unit Number(s) – EU-7** **EU-7**: One (1) Bulk receiving system equipped with two (2) storage silos, pneumatic transfer station, and two (2) baghouses. **[Reference: MDE ARA Reg. No. 9-0024]**
2.1	**Applicable Standards/Limits:** **A. Control of Visible Emissions** **COMAR 26.11.06.02C(2) – Visible Emissions**. "In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers." **COMAR 26.11.06.02A(2) – Exceptions**. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period." **B. Control of Particulate Matter COMAR 26.11.06.03B(2)(a)** "A person may not cause or permit to be discharged into outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm)."
2.2	**Testing Requirements:** **A. Control of Visible Emissions** See Monitoring Requirements. **B. Control of Particulate Matter** See Monitoring and Record Keeping Requirements.
2.3	**Monitoring Requirements:** **A. Control of Visible Emissions** The Permittee shall conduct a 1-minute visual observation of the baghouse exhaust once per month. The visual observation must be conducted while the bulk receiving system and the baghouse are in operation. If no visible emissions are observed in six consecutive

Table IV -2

	monthly observations from the baghouse exhaust, the Permittee may decrease the frequency of visual observations from monthly to quarterly. If visible emissions are observed during any quarterly 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 during six consecutive monthly visual observations. If visible emissions are observed during any observation, the Permittee must inspect the baghouse for the cause of visible emissions and perform necessary adjustments or repairs within 24-hours or prior to operating the bulk receiving system and the baghouse. If visible emissions have not been eliminated, the Permittee shall perform a daily 18-minute visual observation for opacity in accordance with EPA Reference Method 9 when operating the bulk receiving system. **[Reference: COMAR 26.11.03.06C]** **B. Control of Particulate Emissions** The Permittee shall maintain the facility's preventive maintenance plan for the baghouses that describes the maintenance activities and time schedule for completing each activity. The Permittee shall review and revise the plan if visible emissions are observed in the exhaust from the baghouses. 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 preventive maintenance that was performed. **[Reference: COMAR 26.11.03.06C]**
2.4	**Record Keeping Requirements:** **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 Emissions** The Permittee shall maintain on site a copy of the preventive maintenance plan and a record of the dates and description of maintenance activities 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]**
2.5	**Reporting Requirements:**

Table IV -2	
	A. Control of Visible Emissions The Permittee shall report incidents of visible emissions in accordance with Section III – Plant Wide Conditions, Condition 4 “Report of Excess Emissions and Deviations.” **B. Control of Particulate Emissions** See Record Keeping Requirements.

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) 3 Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

One (1) 125 kW (167 HP) Caterpillar Olympian (Model D12P52) diesel powered emergency generator serving the wastewater plant

One (1) 3.5kW Subaru Powermate (Model 3500 CX3500) natural gas powered serving the production plant

One (1) 212 HP diesel powered Caterpillar (Model Olympian) Emergency Generator for the Wastewater Treatment Plant (installed in 2004).

The following requirements apply to the one (1) 125 kW (167 HP) Caterpillar Olympian (Model D12P52) diesel powered emergency generator; and one (1) 212 HP diesel powered Caterpillar (Model Olympian) Emergency Generator for the Wastewater Treatment Plant (installed in 2004):

One (1) 125 kW (167 HP) Caterpillar Olympian (Model D12P52) diesel powered emergency generator serving the wastewater plant. One (1) 212 HP diesel powered Caterpillar (Model Olympian) Emergency Generator for the Wastewater Treatment Plant (installed in 2004).
Applicable Standards/Limits: **A. National Emission Standards for Hazardous Air Pollutants 40 CFR, Subpart 63** – Stationary Reciprocating Internal Combustion Engines. "By May 3, 2013, "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 2b to this subpart that apply to you." **[Reference: 40 CFR §63.6603(a), 63.6605, 63.6612, 63.6620, 63.6625, 63.6630, 63.6640, 63.6645, 63.6655]**

B. 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) 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) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:

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

(ii) All other engines: 15 minutes.

(c) Section E(2) and (3) does not apply while maintenance, repair, or testing is being performed by qualified mechanics."

C. Control of Sulfur Oxides

COMAR 26.11.09.07A(1) – Sulfur Content Limitations for Fuel.

"A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: In Areas III and IV:
(b) Distillate fuel oils, 0.3 percent."
Note: The Permittee must comply with sulfur content limitations for fuel (15 ppm) as stated in 40 CFR 63.6604.

D. Operational Limit

(1) The Permittee must operate and maintain the engine according to the manufacturer's emission-related written instructions or the Permittee must develop their 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. **[Reference: 40 CFR §63.6605, §63.6625(e), §63.6625(f), §63.6640, and Table 2d]**

The Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d of 40 CFR 63, Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d. 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 Permittee is not required to change the oil. If any of the limits are exceeded, the Permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the Permittee must change the oil within 2 business days or before commencing operation, whichever is later. The Permittee 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. **[Reference: 40 CFR §63.6625(i)]**

(2) In accordance with 40 CFR §63.6625(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.” **[Reference: 40 CFR §63.6625(h)]**

Testing Requirements:

A. National Emission Standards for Hazardous Air Pollutants 40 CFR, Subpart 63 – Stationary Reciprocating Internal

Combustion Engines.
See Monitoring Requirements.

B. Control of Visible Emissions
See Monitoring Requirements.

C. Control of Sulfur Oxides
See Monitoring Requirements.

D. Operational Limit
See Monitoring Requirements.

Monitoring Requirements:

A. National Emission Standards for Hazardous Air Pollutants 40 CFR, Subpart 63 – Stationary Reciprocating Internal Combustion Engines.
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 2b to this subpart that apply to you.

(a) Change oil and filter every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first;

(b) Inspect air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and

(c) Inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

[Reference: 40 CFR §63.6603(a), §63.6625(h), and Table 2d to 40 CFR 63, Subpart ZZZZ]

B. Control of Visible Emissions
The Permittee shall properly operate and maintain engines in a manner to minimize visible emissions. **[Reference: COMAR 26.11.03.06C]**

C. Control of Sulfur Oxides
The Permittee shall obtain a certification from the fuel supplier indicating that the fuel oil complies with the limitation on sulfur content of the fuel oil. **[Reference: COMAR 26.11.03.06C]**

D. **Operational Limit**
See Record Keeping and Reporting Requirements.

Record Keeping Requirements:

Note: All records must be maintained for a period of 5 years. **[Reference: COMAR 26.11.03.06C(5)(g)]**

A. **National Emission Standards for Hazardous Air Pollutants**
40 CFR, Subpart 63 – Stationary Reciprocating Internal Combustion Engines.
If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in § 63.10(b)(2)(xiv).

(2) Records of the occurrence and duration (in hours) of each malfunction of operation (*i.e.,* process equipment) or the air pollution control and monitoring equipment.

(3) Records of performance tests and performance evaluations as required in § 63.10(b)(2)(viii).

(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation**.**
[Reference: 40 CFR §63.6655(a) and 40 CFR 63, Subpart ZZZZ]

B. **Control of Visible Emissions**
The Permittee shall retain records of preventive maintenance on site for at least five years and make these records available to the Department upon request. **[Reference: COMAR 26.11.03.06C]**

C. **Control of Sulfur Oxides**
The Permittee shall retain annual fuel supplier certifications stating that the fuel oil is in compliance with this regulation must

be maintained for at least 5 years. **[Reference: COMAR 26.11.09.07C]**

D. Operational Limit
See Record Keeping Requirements listed in Item A of this Section.

Reporting Requirements:

A. National Emission Standards for Hazardous Air Pollutants
40 CFR, Subpart 63 – Stationary Reciprocating Internal Combustion Engines.
The Permittee must submit report semiannually according to the requirements in § 63.6650(b)(1)-(5) for engines that are not limited use stationary RICE subject to numerical emission limitations.
[Reference: 40 CFR §63.6603(a), and Table 2d to 40 CFR 63, Subpart ZZZZ]

B. Control of Visible Emissions
The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, Plant Wide Condition, “Report of Excess Emissions and Deviations.”

C. Control of Sulfur Oxides
The Permittee shall report annual fuel supplier certification to the Department upon request. **[Reference: COMAR 26.11.03.06C]**

D. Operational Limit
See Record Keeping Requirements listed in Item A of this Section.

Note: There is an additional state-only enforceable requirement that applies to the generators which is found in Section VI – State-only Requirements of the permit.

(2) 12 *Space heaters utilizing direct heat transfer and used solely for* comfort heat (2 – inspector shop, 1 – electric shop, 1 – limestone shack, 1 – women's bathroom, 2 – main laboratory, and 4 – boiler room);

COMAR 26.11.09.07A(2)(b), which establishes that the Permittee may not burn, sell, or make available for sale any distillate fuel with a sulfur content by weight in excess of 0.3 percent.;

(3) 1 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;

(4) 4 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

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

(a) COMAR 26.11.19.09D(2)(b), which establishes that the Permittee shall not use any VOC degreasing material that exceeds a vapor pressure of 1 mm Hg at 20 ° C;

(b) COMAR 26.11.19.09D(3)(a—d), which requires that the Permittee implement good operating practices designed to minimize spills and evaporation of VOC degreasing material. These practices, which shall be established in writing and displayed such that they are clearly visible to operators, shall include covers (including water covers), lids, or other methods of minimizing evaporative losses, and reducing the time and frequency during which parts are cleaned;

(c) COMAR 26.11.19.09D(4), which prohibits the use of any halogenated VOC for cold degreasing.

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

(a) Monthly records of the total VOC degreasing materials used; and

(b) Written descriptions of good operating practices designed to minimize spills and evaporation of VOC degreasing materials.

(5) 12 Equipment for drilling, carving, cutting, routing, turning, sawing, planning, spindle sanding, or disc sanding of wood or wood products;

(6) X Containers, reservoirs, or tanks used exclusively for:

37 Storage of butane, propane, or liquefied petroleum, or natural gas (3 – propane tank, 1 – vehicle shop, 2 – Laboratory, 8 – castor pits, 1 – Bldg No. 60, 9 – Machine #5, 9 – warehouse, 2 – boiler house);

3 Storage of lubricating oils (all 3 storage areas have capacity < 10,568 gallons);

2 Storage of nos. 1 to 6 fuel oil and aviation jet engine fuel;

4 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;

(7) 6 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;

(8) 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;

(9) 1 Potable water treatment equipment, not including air stripping equipment;

(10) 7 Grain, metal, or mineral extrusion presses;

(11) 5 Laboratory fume hoods and vents; (2 – main lab, 1 – portable unit, 1 – process laboratory, 1 – wet pulp laboratory);

(12) Emission units, not listed in this section, with a potential to emit less than the "de minimus" levels listed in COMAR 26.11.02.10X.

1 Felt paper machine with hydropulper and scrubber;

1 Unloading system;

1 Transfer system;

1 Wastewater treatment system.

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 and 26.11.06.09, which generally prohibit the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

Congoleum CORPORATION

June 6, 2024

Air Quality Permits Program
Air and Radiation Management Administration
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD 21230

RE: Part 70 Permit Application for Renewal
Congoleum Corporation
2700 Emory Road
Finksburg, Maryland
Permit No. 24-013-00013

To whom it concerns,

Please find the enclosed Part 70 permit renewal application for the Congoleum Corporation facility in Finksburg, Maryland. The enclosure includes all required application forms, checklists, and attachments for a complete submission.

If you have any questions, please contact me at my office at (610) 485-8902. Thank you for your assistance.

Sincerely,
CONGOLEUM CORPORATION

Jarret Sproull
EHS Director

Attachment 1: Process Flow Diagram and Site Map
2: 2023 Emission Certification Report
3: Deviation Report for 2023
4: 2023 Annual Compliance Certification Report
5: Checklist of Insignificant Activities
6: Budget Reconciliation and Financing Act Form

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MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard • Baltimore MD 21230
(410) 537-3000 • 1-800-633-6101 • http://www.mde.state.md.us

PART 70 PERMIT APPLICATION FOR RENEWAL

AIR AND RADIATION 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: Congoleum Corporation		
Street Address: 3500 Quakerbridge Road		
City: Mercerville	State: NJ	Zip Code: 08619
Telephone Number (609) 584-3000		Fax Number

Facility Information:

Name of Facility: Congoleum Corporation		
Street Address: 2700 Emory Road		
City: Finksburg	State: MD	Zip Code: 21048
Plant Manager: Weld McIlvain	Telephone Number: (609) 584-3000	Fax Number:
24-Hour Emergency Telephone Number for Air Pollution Matters: (610) 731 5204		

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

[✓] 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 Jarret Sproull 6/6/24

SIGNATURE DATE

Jarret Sproull

PRINTED NAME

EHS Director

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).

Facility manufactures felt to be utilized as backing for the production of vinyl flooring at another Congoleum location.

The SIC Code for the site is 2661.

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:

PM10 0.19 NOx 5.26 VOC 0.29 SOx 0.03 CO 4.41 HAPs 0.0

Data from CY2023

3. Include With the Application:

Flow Diagrams showing all emissions units, emission points, and control devices;
Emissions Certification Report (copy of the most recent submitted to the Department.)

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-03, EU-04, EU-05 1a. Date of installation (month/year): 1948	2. MDE Registration No.:(if applicable) 5-0003, 5-0004, 5-0005

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

Three (3) identical Riley boiler emission units are rated for 59 MM BTU/hr

Each of these boilers utilize natural gas as the primary fuel source

The boiler does also maintain the duel capability to burn No.2 fuel oil.

The boiler shares a common stack with the other 2 boilers located in the same room.

The stack is approximately 150 ft high and has a 108 in (or 9 ft) diameter

The exhaust rate potential is about 1,600 CFM at 600 degrees Fahrenheit.

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

General Reference: _____

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	N/A	105.15 MMCF
2. No.2 Fuel Oil	<0.3%	500 gallons
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 5.26 SOx 0.03 VOC 0.29 PM10 0 HAPs 0

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-06 1a. Date of installation (month/year): 1941	2. MDE Registration No.:(if applicable) 5-0006

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

One (1) Keeler Boiler rated at 33 MMBTU/hr.

The boiler utilizes natural gas as its primary fuel source.

This boiler also can burn No.2 fuel oil as a backup fuel source.

The boiler shares a common stack with the other 2 boilers located in the same room.

The stack is approximately 150 ft high and has a 108 in (or 9 ft) diameter

The exhaust rate potential is about 1,600 CFM at 600 degrees Fahrenheit.

NOTE: This Keeler boiler is currently out-of-service. The boiler has been inspected and corrective actions have been determined. Thus, Congoleum wishes to maintain this EU in the permit since the boiler has the potential to be put back into service.

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

General Reference: _____

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas		
2. No.2 Fuel Oil	<0.3%	0
3.		

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

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

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: EU-07 1a. Date of installation (month/year): June 1982	2. MDE Registration No.:(if applicable) 9-0024

3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):
Bulk receiving system includes: (2) storage silos, pneumatic transfer system, (2) baghouses for particulate control

The two (2) silos are connected wherein one baghouse is situated on top of one silo and is utilized only during receipt of limestone raw material. The displaced air is filtered through this bag house.

The other baghouse is positioned on top of a weigh bin and used for each batch of material that is blended. The drop of limestone raw material on the weigh bin causes the material to be displaced in the air and thus, this baghouse controls the particulates from this process.

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

General Reference: _____

Continuous Processes: _____ hours/day _____ days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

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

6. Emissions in Tons:

A. Actual Major: _____ Potential Major: X (note: before control device)

B. Actual Emissions: NOx 0 SOx 0 VOC 0 PM10 0.19 HAPs 0

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

Emissions Unit No.: EU-03, EU-04, EU-05, EU-06 **General Reference:** _____

Briefly describe the Emission Standard/Limit or Operational Limitation:

COMAR 26.11.09.05A(2) - Prohibits visible emissions.

COMAR 26.11.09.05A(3) - Allows visible emissions during events. Not to exceed 40% opacity for more than 6 consecutive minutes.

COMAR 26.11.09.06B(6)(A) - Exempts units from particulate matter standards and requirements to install dust collector.

COMAR 26.11.09.07A(2)(B) - Limits the sulfur content in the No.2 Fuel oil to 0.3% by wt.

Permit Shield Request: _____

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: _____
- ☑ Annual Compliance Certification: _____
- ☑ Semi-Annual Monitoring Report: _____

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

1) Maintain an operations manual and preventive maintenance plan.

2) Retain sulfur content documentation from #2 fuel oil supplier.

Testing: Reference _____ Describe: _____

Record Keeping: Reference _____ Describe: 1) Record number of hours used for No 2 Fuel Oil on each boiler

2) Conduct and record inspections, adjustments, and/or repairs.

3) Maintain records of sulfur content of fuel oil received.

4) Maintain boiler operator training records.

Reporting: Reference _____ Describe: _____

1) Report incidents of visible emissions.

2) Report periods of visible emission in annual compliance certification.

Frequency of submittal of the compliance demonstration: Six (6) month Deviation & Annual Compliance

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.: _____ **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.: _____

Briefly describe any alternate operating scenarios. Assign a number to each scenario for identification purposes.

N/A

SECTION 3E. CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS FOR AN ALTERNATE OPERATING SCENARIO

Scenario No.: _____

Emissions Unit No.: _____ **General Reference:** _____

Briefly describe any applicable Emissions Standard/Limits/Operational Limitations:

N/A

Compliance Demonstration

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference _____ Describe: _____

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: _____

SECTION 4. CONTROL EQUIPMENT

1. Associated Emissions Units No. : EU-7	2. Emissions Point No.:

3. Type and Description of Control Equipment:

Two (2) baghouses are used on the limestone silos to control particulate matter from the offloading of the material and the blending operation in which particulates can be displaced inside a weigh bin.

Installation Date: June 1982

Manufacturer: Fuller Company

Model: #3 Unifilter Model B

Silo Model: Multi-Zone Row-Pulse dust collector with pulse timer (Serial #: 82-2010-325)

4. Pollutants Controlled:	Control Efficiency:
Particulates (PM)	99.9%

5. Capture Efficiency:

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	PM	SOx	NOx	VOC	CO
CAS Number					
Emissions Unit # 3	0.05	0.02	2.8	0.15	2.35
Emissions Unit # 4	0	0	0	0	0
Emissions Unit # 5	0.05	0.01	2.46	0.14	2.06
Emissions Unit # 6	0	0	0	0	0
Emissions Unit # 7	0.19	0	0	0	0
Emissions Unit # 8	0	0	0	0	0
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions					
Total	0.20	0.03	5.26	0.29	4.41

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:
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
Applicable Federally Enforceable Requirement being Violated:	

2. Description of Plan to Achieve Compliance:

Certified Progress Reports for sources in noncompliance shall be submitted at least quarterly to the Department.

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STATE-ONLY ENFORCEABLE REQUIREMENTS

Facility Information:

Name of Facility:	County
Congoleum Corporation	Carroll
Premises Number:	
Street Address: 2700 Emory Road, Finksburg, MD 21048	
24-hour Emergency Telephone Number for Air Pollution Matters: 610-731-5204	
Type of Equipment (List Significant Units):	
5-0003 59 MMBTU/hr Riley Boiler	
5-0004 59 MMBTU/hr Riley Boiler	
5-0005 59 MMBTU/hr Riley Boiler	
5-0006 33 MMBTU/hr Keeler Boiler	
9-0024 Bulk Receiving System with (2) Baghouses	
EU-08 212 HP Caterpillar Emergency Generator for Wastewater Treatment facility	

CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY ENFORCEABLE REQUIREMENTS

Registration No.: 5-0003, 5-0004, 5-0005, 5-0006, 5-0007

Emissions Unit No.: EU-3, EU-4, EU-5, EU-6, EU-07 **General Reference:**

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

COMAR 26.11.06.08 and 26.11.06.09: Prohibits the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.

COMAR 26.11.36.03A(5): Establishes that owner or operator of emergency generator or load shaving unit may not operate the engine for testing & engine maintenance purposes between 12:01 am and 2:00 p.m. on any day on which Department forecasts air quality will be a code orange or red or purple [...]

Methods used to demonstrate compliance:

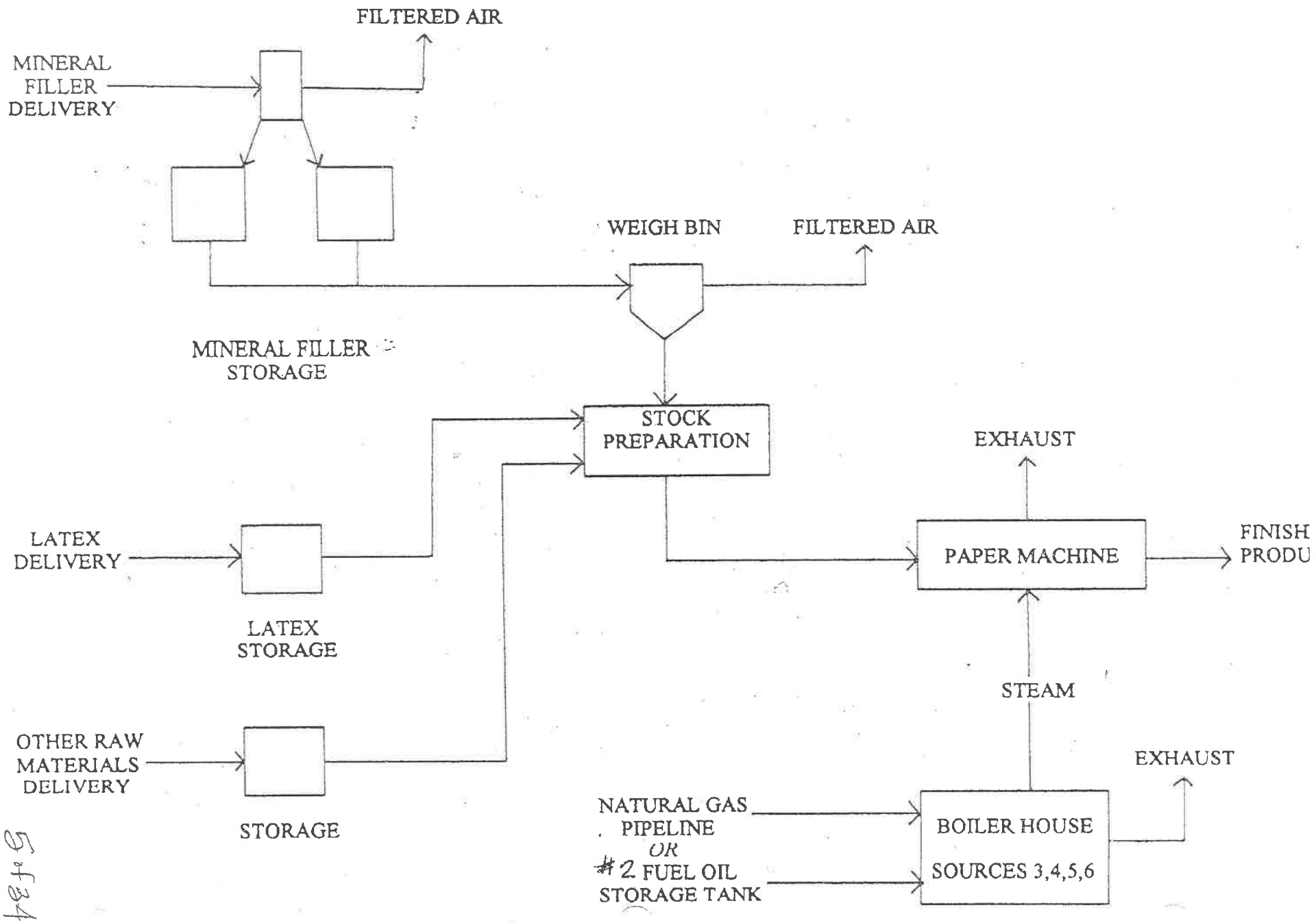
1) Conduct visible emission inspections monthly for bulk receiving system and boilers when burning No.2 Fuel Oil

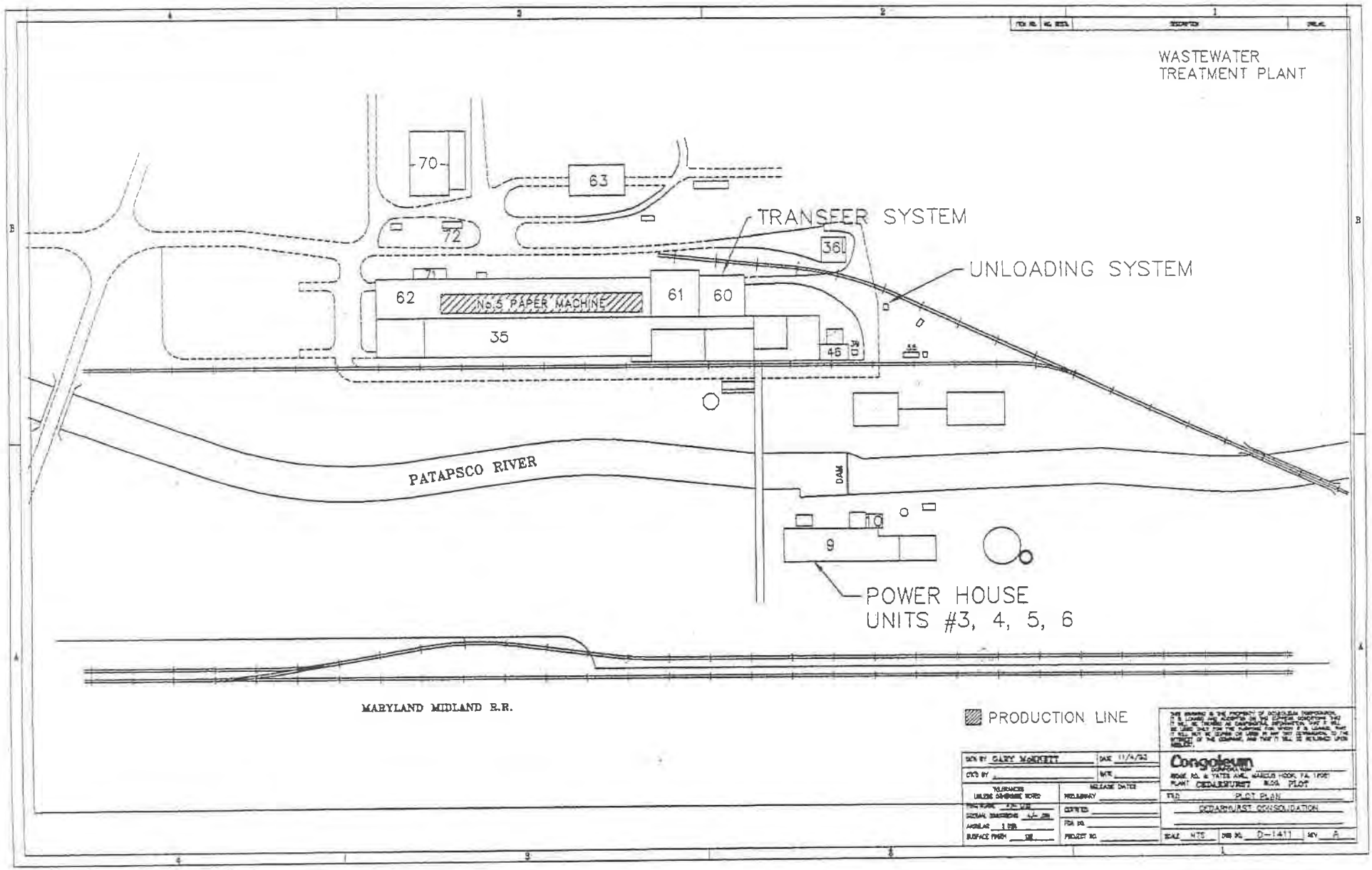
2) Record and document date and hours of use for emergency generator

Congoleum CORPORATION

Attachment 1:
Process Flow Diagram and Site Map

CONGOLEUM CORPORATION
FLOW DIAGRAM




WASTEWATER
TREATMENT PLANT
70
63
72
TRANSFER SYSTEM
36
UNLOADING SYSTEM
62
No.5 PAPER MACHINE
61
60
35
46
PATAPSCO RIVER
DAM
10
9
POWER HOUSE
UNITS #3, 4, 5, 6
MARYLAND MIDLAND R.R.
PRODUCTION LINE
DRN BY GARY McKEEFF
DATE 11/4/93
CKD BY
DATE
RELEASE DATES
PRELIMINARY
CERTIFIED
FOR BID
PROJECT NO.
Congoleum
PLANT CEDARHURST
BLDG PILOT
TITLE PLOT PLAN
CEDARHURST CONSOLIDATION
SCALE NTS
DWG NO. D-1411
REV A

Congoleum CORPORATION

Attachment 2:
2023 Emission Certification Report

Congoleum FLOORING

March 14, 2024

Maryland Department of the Environment
Air and Radiation Management Administration
1800 Washington Boulevard, Suite 715
Baltimore, Maryland 21230-1720

RE: CY2023 Emission Certification Report
Facility Number: 013-00013

To Whom It May Concern:

Enclosed is the Calendar Year 2023 Emission Certification Report for the Congoleum Acquisitions facility located in Finksburg, Carroll County.

If you have any questions on the report, please contact me at (610) 731 5204. Thank you for your assistance.

Sincerely,
CONGOLEUM ACQUISITIONS

Jarret Sproull
EHS Director
Congoleum Acquisitions

Attached in Duplicate:
Form 1: General Facility Information
Form 2: Criteria Air Pollutants – SOx, NOx, VOC, CO
Form 3: Particulate Matter (PM)
Form 4: Toxic Air Pollutants
Form 5: Billable Toxic Air Pollutants
Form 6: Greenhouse Gas Air Pollutants
Emission Calculation Supporting Documentation

h:\environ\Plant 4\2air\EmitRept\2021\CY2021 Emission Statement Cover Letter -033122-P4

MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard, Suite 715 • Baltimore Maryland 21230-1720
410-537-3000 • 1-800-633-6101 • http://www.mde.state.md.us
Air and Radiation Management Administration
Air Quality Compliance Program
410-537-3220

FORM 1:

GENERAL FACILITY INFORMATION
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2023

A. FACILITY IDENTIFICATION Facility Name: Congoleum Acquisition, LLC	**Do Not Write in This Space**
	Date Received Regional
Address: 2700 Emory Road	Date Received State
City: Finksburg County: Carroll Zip Code: 21048	AIRS Code
B. Briefly describe the major function of the facility	FINDS Code
Felt Manufacturing Process	SIC Code
	Facility Number:
	TEMPO ID:
C. SEASONAL PRODUCTION (%, if applicable)	Reviewed by:

Winter *(Dec.-Feb.)*	Spring *(Mar – May)*	Summer *(Jun – Aug)*	Fall *(Sept – Nov)*
25	25	25	25

Name Date

D. Explain any increases or decreases in emissions from the previous calendar year for each registration at this facility.

E. CONTROL DEVICE INFORMATION (for NOx and VOC sources only)

Control Device	Capture Efficiency	Removal Efficiency

I am familiar with the facility and the installations and sources for which this report is submitted. I have personally examined the information in this report, which consists of 26 pages (including attachments), and certify that the information is correct to the best of my knowledge.

Jarret Sproull	EHS Director	3/14/24
Name (Print/Type)	Title	Date
Jarret Sproull		(610) 731-5204
Signature		Telephone

1/09/08

Cover Page for MDE Emission Certification Report **Calendar Year: 2023**

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

FORM 2

CRITERIA POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Criteria Pollutants

24-013-00013 Congoleum Acquisition Please Enter Facility ID and Name in Equipment Inventory Spreadsheet

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 #1	5-003	S	NG	1.50E-01	3.03E+00	3.28E+00	2.80E+00	5.50E+01	5.97E+01	2.00E-02	3.30E-01	2.35E+00	4.62E+01	0.00E+00	2.00E-04	C3/C4
Boiler #2	5-004	S	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	0.00E+00	0.00E+00	C3/C4
Boiler #3	5-005	S	NG	1.40E-01	1.97E+00	2.20E+00	2.46E+00	3.58E+01	4.00E+01	1.00E-02	2.10E-01	2.06E+00	3.01E+01	0.00E+00	2.00E-04	C3/C4
Boiler #6	5-006	S	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	0.00E+00	0.00E+00	C3/C4
Boiler #1	5-003	S	No.2	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	0.00E+00	0.00E+00	C3/C4
Boiler #2	5-004	S	No.2	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	0.00E+00	0.00E+00	C3/C4
Boiler #3	5-005	S	No.2	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	0.00E+00	0.00E+00	C3/C4
Boiler #6	5-006	S	No.2	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	0.00E+00	0.00E+00	C3/C4
Total Emissions				2.90E-01	5.00E+00	5.48E+00	5.26E+00	9.08E+01	9.96E+01	3.00E-02	5.40E-01	4.41E+00	7.63E+01	0.00E+00	4.00E-04	

CALENDAR YEAR: 2021

FORM 3

PARTICULATE MATTER
EMISSIONS CERTIFICATION REPORT

24-013-00013 Congoleum Acquisition Please Enter Facility ID and Name in Equipment Inventory Spreadsheet

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 #1	5-003	S	NG	5.00E-02	1.05E+00	0.00E+00	0.00E+00	5.00E-02	1.05E+00	1.60E-01	3.14E+00	C2
Boiler #2	5-004	S	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	C2
Boiler #3	5-005	S	NG	5.00E-02	6.80E-01	0.00E+00	0.00E+00	5.00E-02	6.80E-01	1.40E-01	2.04E+00	C2
Boiler #6	5-006	S	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	C2
Bulk Receiving	9-0024	S		1.90E-01	1.21E+01	1.90E-01	1.21E+01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C2
	#											
	#											
	#											
	#											
	#											
Total Emissions				2.90E-01	1.39E+01	1.90E-01	1.21E+01	1.00E-01	1.73E+00	3.00E-01	5.18E+00	

CALENDAR YEAR: 2021

FORM 4

REPORTABLE TOXIC AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

24-013-00013 Congoleum Acquisition Please Enter Facility ID and Name in Equipment Inventory Spreadsheet

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			
Boiler #1	5-003	S	NG								
Boiler #2	5-004	S	NG								
Boiler #3	5-005	S	NG								
Boiler #6	5-006	S	NG								
Bulk Receiving	9-0024										

Pollutant Totals	fill in these two columns	tons/yr	lbs/day	lbs/hr
Total Toxics	-	0.00E+00	0.00E+00	0.00E+00

CALENDAR YEAR: 2021

FORM 5

BILLABLE TOXIC AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

24-013-00013 Congoleum Acquisition

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				

Billable TAPs
Pollutant

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

FORM 6

GREENHOUSE GASES
EMISSIONS CERTIFICATION REPORT

24-013-00013 Congoleum Acquisition Please Enter Facility ID and Name in Equipment Inventory Spreadsheet

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 #1	5-003	S	NG	3.36E+03	6.60E+04	6.00E-02	1.27E+00	6.00E-02	1.27E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C2
Boiler #2	5-004	S	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	0.00E+00	0.00E+00	C2
Boiler #3	5-005	S	NG	2.95E+03	4.30E+04	6.00E-02	8.20E-01	5.00E-02	7.90E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	C2
Boiler #6	5-006	S	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	0.00E+00	0.00E+00	C2
	#															
	#															
	#															
	#															
	#															
Total Emissions				6.31E+03	1.09E+05	1.20E-01	2.09E+00	1.10E-01	2.06E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	

CALENDAR YEAR: 2021

Congoleum
FLOORING

Emission Calculations

For

Natural Gas Consumption

#2 Fuel Oil Consumption

Limestone Consumption

2700 Emory Road • Finksburg, MD • 21048 • (609) 584-3000 x8902

Boiler #1
Natural Gas Consumption

Boiler 1	Total Gas Used (scf)	Boiler Operation Time (hours)	Boiler Operation Time (days)	Boiler Operation Time (weeks)	Weighted Consumption (scf)
Jan-23	20,313,000	196	8	1	4,463,395
Feb-23	15,439,000	240	11	2	4,678,485
Mar-23	14,845,000	191	8	1	5,603,547
Apr-23	11,102,000	230	10	1	6,737,361
May-23	8,033,000	155	6	1	4,095,773
Jun-23	8,910,000	194	8	1	5,114,024
Jul-23	5,606,000	124	5	1	2,803,000
Aug-23	6,677,000	168	7	1	3,338,500
Sep-23	7,181,000	162	7	1	3,590,500
Oct-23	9,575,000	144	6	1	3,499,492
Nov-23	15,753,000	180	8	1	3,150,600
Dec-23	12,176,000	600	25	4	8,952,941
Total-23	**135,610,000**	**2,584.00**	**109**	**16**	**56,027,619**
Ave-23					

Boiler #1
Natural Gas Consumption

Boiler 1	SOx				NOx				VOC				C	
	Lb/Mo	Lb/Day	Tons/ Mo	TOSD Lb/Day	Lb/Mo	Lb/Day	Tons/ Mo	TOSD Lb/Day	Lb/Mo	Lb/Day	Tons/ Mo	TOSD Lb/Day	Lb/Mo	Lb/Day
Jan-23	2.68	0.33	0.00		446.34	54.65	0.22		24.55	3.01	0.01		374.93	45.91
Feb-23	2.81	0.28	0.00		467.85	46.78	0.23		25.73	2.57	0.01		392.99	39.30
Mar-23	3.36	0.42	0.00		560.35	70.41	0.28		30.82	3.87	0.02		470.70	59.15
Apr-23	4.04	0.42	0.00		673.74	70.30	0.34		37.06	3.87	0.02		565.94	59.05
May-23	2.46	0.38	0.00		409.58	63.42	0.20		22.53	3.49	0.01		344.04	53.27
Jun-23	3.07	0.38	0.00		511.40	63.27	0.26		28.13	3.48	0.01		429.58	53.14
Jul-23	1.68	0.33	0.00		280.30	54.25	0.14		15.42	2.98	0.01		235.45	45.57
Aug-23	2.00	0.29	0.00		333.85	47.69	0.17		18.36	2.62	0.01		280.43	40.06
Sep-23	2.15	0.32	0.00		359.05	53.19	0.18		19.75	2.93	0.01		301.60	44.68
Oct-23	2.10	0.35	0.00		349.95	58.32	0.17		19.25	3.21	0.01		293.96	48.99
Nov-23	1.89	0.25	0.00		315.06	42.01	0.16		17.33	2.31	0.01		264.65	35.29
Dec-23	5.37	0.21	0.00		895.29	35.81	0.45		49.24	1.97	0.02		752.05	30.08
Total-23	**33.62**		**0.02**		**5,602.76**		**2.80**		**308.15**		**0.15**		**4,706.32**	
Ave-23		**0.33**		**0.36**		**55.01**		**59.66**		**3.03**		**3.28**		**46.21**

Boiler #1
Natural Gas Consumption

Boiler 1	D		PM (Total Filterable)			PM (2.5 Filterable)			PM (Condensable)		
	Tons/ Mo	TOSD Lb/Day	Lb/Mo	Lb/Day	Tons/ Mo	Lb/Mo	Lb/Day	Tons/ Mo	Lb/Mo	Lb/Day	Tons/ Mo
Jan-23	0.19		8.48	1.04	0.00	8.48	1.04	0.00	25.44	3.12	0.01
Feb-23	0.20		8.89	0.89	0.00	8.89	0.89	0.00	26.67	2.67	0.01
Mar-23	0.24		10.65	1.34	0.01	10.65	1.34	0.01	31.94	4.01	0.02
Apr-23	0.28		12.80	1.34	0.01	12.80	1.34	0.01	38.40	4.01	0.02
May-23	0.17		7.78	1.20	0.00	7.78	1.20	0.00	23.35	3.61	0.01
Jun-23	0.21		9.72	1.20	0.00	9.72	1.20	0.00	29.15	3.61	0.01
Jul-23	0.12		5.33	1.03	0.00	5.33	1.03	0.00	15.98	3.09	0.01
Aug-23	0.14		6.34	0.91	0.00	6.34	0.91	0.00	19.03	2.72	0.01
Sep-23	0.15		6.82	1.01	0.00	6.82	1.01	0.00	20.47	3.03	0.01
Oct-23	0.15		6.65	1.11	0.00	6.65	1.11	0.00	19.95	3.32	0.01
Nov-23	0.13		5.99	0.80	0.00	5.99	0.80	0.00	17.96	2.39	0.01
Dec-23	0.38		17.01	0.68	0.01	17.01	0.68	0.01	51.03	2.04	0.03
Total-23	**2.35**		**106.45**		**0.05**	**106.45**		**0.05**	**319.36**		**0.16**
Ave-23		**50.12**		**1.05**			**1.05**			**3.14**	

Boiler #1
Natural Gas Consumption

Boiler 1	CO2 (Carbon Dioxide)				CH4 (Methane)				N2O (Nitrous Oxide)			
	Lb/ Mo	Lb/ Day	Lb/ Hour	Tons/ Mo	Lb/ Mo	Lb/ Day	Lb/ Hour	Tons/ Mo	Lb/ Mo	Lb/ Day	Lb/ Hour	Tons/ Mo
Jan-23	535,607.35	65,584.57	2,732.69	267.80	10.27	1.26	0.05	0.01	9.82	1.20	0.05	0.00
Feb-23	561,418.18	56,141.82	2,339.24	280.71	10.76	1.08	0.04	0.01	10.29	1.03	0.04	0.01
Mar-23	672,425.69	84,493.28	3,520.55	336.21	12.89	1.62	0.07	0.01	12.33	1.55	0.06	0.01
Apr-23	808,483.38	84,363.48	3,515.15	404.24	15.50	1.62	0.07	0.01	14.82	1.55	0.06	0.01
May-23	491,492.76	76,102.11	3,170.92	245.75	9.42	1.46	0.06	0.00	9.01	1.40	0.06	0.00
Jun-23	613,682.84	75,919.53	3,163.31	306.84	11.76	1.46	0.06	0.01	11.25	1.39	0.06	0.01
Jul-23	336,360.00	65,101.94	2,712.58	168.18	6.45	1.25	0.05	0.00	6.17	1.19	0.05	0.00
Aug-23	400,620.00	57,231.43	2,384.64	200.31	7.68	1.10	0.05	0.00	7.34	1.05	0.04	0.00
Sep-23	430,860.00	63,831.11	2,659.63	215.43	8.26	1.22	0.05	0.00	7.90	1.17	0.05	0.00
Oct-23	419,939.09	69,989.85	2,916.24	209.97	8.05	1.34	0.06	0.00	7.70	1.28	0.05	0.00
Nov-23	378,072.00	50,409.60	2,100.40	189.04	7.25	0.97	0.04	0.00	6.93	0.92	0.04	0.00
Dec-23	1,074,352.94	42,974.12	1,790.59	537.18	20.59	0.82	0.03	0.01	19.70	0.79	0.03	0.01
Total-23	**6,723,314**			**3,361.66**	**128.86**			**0.06**	**123.26**			**0.06**
Ave-23		**66,011.90**	**2,750.50**			**1.27**	**0.05**			**1.21**	**0.05**	

Boiler #2
Natural Gas Consumption

Boiler 2	Total Gas Used (scf)	Boiler Operation Time (hours)	Boiler Operation Time (days)	Boiler Operation Time (weeks)	Weighted Consumption (scf)
Jan-23	20,313,000	-	-	-	-
Feb-23	15,439,000	-	-	-	-
Mar-23	14,845,000	-	-	-	-
Apr-23	11,102,000	-	-	-	-
May-23	8,033,000	-	-	-	-
Jun-23	8,910,000	-	-	-	-
Jul-23	5,606,000	-	-	-	-
Aug-23	6,677,000	-	-	-	-
Sep-23	7,181,000	-	-	-	-
Oct-23	9,575,000	-	-	-	-
Nov-23	15,753,000	-	-	-	-
Dec-23	12,176,000	-	-	-	-
Total-23	**135,610,000**	**-**	**-**	**0.00**	**-**
Ave-23					

Boiler #2
Natural Gas Consumption

Boiler 2	SOx				NOx				VOC			
	Lb/Mo	Lb/Day	Tons/ Mo	TOSD Lb/Day	Lb/Mo	Lb/Day	Tons/ Mo	TOSD Lb/Day	Lb/Mo	Lb/Day	Tons/ Mo	TOSD Lb/Day
Jan-23	-		-		-		-		-		-	
Feb-23	-		-		-		-		-		-	
Mar-23	-		-		-		-		-		-	
Apr-23	-		-		-		-		-		-	
May-23	-		-		-		-		-		-	
Jun-23	-		-		-		-		-		-	
Jul-23	-		-		-		-		-		-	
Aug-23	-		-		-		-		-		-	
Sep-23	-		-		-		-		-		-	
Oct-23	-		-		-		-		-		-	
Nov-23	-		-		-		-		-		-	
Dec-23	-		-		-		-		-		-	
Total-23	-		-		-		-		-		-	
Ave-23		-		-		-		-		-		-

Boiler #2
Natural Gas Consumption

Boiler 2	CO				PM (Total Filterable)			PM (2.5 Filterable)			PM (Condensable)		
	Lb/Mo	Lb/Day	Tons/ Mo	TOSD Lb/Day	Lb/Mo	Lb/Day	Tons/ Mo	Lb/Mo	Lb/Day	Tons/ Mo	Lb/Mo	Lb/Day	Tons/ Mo
Jan-23	-		-		-		-	-		-	-		-
Feb-23	-		-		-		-	-		-	-		-
Mar-23	-		-		-		-	-		-	-		-
Apr-23	-		-		-		-	-		-	-		-
May-23	-		-		-		-	-		-	-		-
Jun-23	-		-		-		-	-		-	-		-
Jul-23	-		-		-		-	-		-	-		-
Aug-23	-		-		-		-	-		-	-		-
Sep-23	-		-		-		-	-		-	-		-
Oct-23	-		-		-		-	-		-	-		-
Nov-23	-		-		-		-	-		-	-		-
Dec-23	-		-		-		-	-		-	-		-
Total-23	-		-		-		-	-		-	-		-
Ave-23		-		-		-			-			-	

Boiler #2
Natural Gas Consumption

Boiler 2	CO2 (Carbon Dioxide)				CH4 (Methane)				N2O (Nitrous Oxide)			
	Lb/ Mo	Lb/ Day	Lb/ Hour	Tons/ Mo	Lb/ Mo	Lb/ Day	Lb/ Hour	Tons/ Mo	Lb/ Mo	Lb/ Day	Lb/ Hour	Tons/ Mo
Jan-23	-			-	-			-	-			-
Feb-23	-			-	-			-	-			-
Mar-23	-			-	-			-	-			-
Apr-23	-			-	-			-	-			-
May-23	-			-	-			-	-			-
Jun-23	-			-	-			-	-			-
Jul-23	-			-	-			-	-			-
Aug-23	-			-	-			-	-			-
Sep-23	-			-	-			-	-			-
Oct-23	-			-	-			-	-			-
Nov-23	-			-	-			-	-			-
Dec-23	-			-	-			-	-			-
Total-23	-			-	-			-	-			-
Ave-23		-	-			-	-			-	-	

Boiler #3
Natural Gas Consumption

Boiler 3	Total Gas Used (scf)	Boiler Operation Time (hours)	Boiler Operation Time (days)	Boiler Operation Time (weeks)	Weighted Consumption (scf)	SOx				NOx		
						Lb/Mo	Lb/Day	Tons/ Mo	TOSD Lb/Day	Lb/Mo	Lb/Day	Tons/ Mo
Jan-23	20,313,000	696	29	4	8,902,927	5.34	0.18	0.00		890.29	30.70	0.45
Feb-23	15,439,000	552	23	3	6,341,018	3.80	0.17	0.00		634.10	27.57	0.32
Mar-23	14,845,000	315	30	4	5,695,706	3.42	0.26	0.00		569.57	43.40	0.28
Apr-23	11,102,000	149	13	2	3,132,951	1.88	0.30	0.00		313.30	50.46	0.16
May-23	8,033,000	149	6	1	2,642,201	1.59	0.26	0.00		264.22	42.56	0.13
Jun-23	8,910,000	144	6	1	2,661,909	1.60	0.27	0.00		266.19	44.37	0.13
Jul-23	5,606,000	124	5	1	1,868,667	1.12	0.22	0.00		186.87	36.17	0.09
Aug-23	6,677,000	168	7	1	2,225,667	1.34	0.19	0.00		222.57	31.80	0.11
Sep-23	7,181,000	162	7	1	2,393,667	1.44	0.21	0.00		239.37	35.46	0.12
Oct-23	9,575,000	250	10	1	3,717,003	2.23	0.21	0.00		371.70	35.68	0.19
Nov-23	15,753,000	720	30	4	7,001,333	4.20	0.14	0.00		700.13	23.34	0.35
Dec-23	12,176,000	216	9	1	2,548,465	1.53	0.17	0.00		254.85	28.32	0.13
Total-23	**135,610,000**	**3,645**	**176**	**25**	**49,131,513**	**29.48**		**0.01**		**4,913.15**		**2.46**
Ave-23							**0.21**		**0.24**		**35.82**	

Boiler #3
Natural Gas Consumption

Boiler 3		VOC				CO				PM (Total Filterable)			PM
	TOSD Lb/Day	Lb/Mo	Lb/Day	Tons/ Mo	TOSD Lb/Day	Lb/Mo	Lb/Day	Tons/ Mo	TOSD Lb/Day	Lb/Mo	Lb/Day	Tons/ Mo	Lb/Mo
Jan-23		48.97	1.69	0.02		747.85	25.79	0.37		16.92	0.58	0.01	16.92
Feb-23		34.88	1.52	0.02		532.65	23.16	0.27		12.05	0.52	0.01	12.05
Mar-23		31.33	2.39	0.02		478.44	36.45	0.24		10.82	0.82	0.01	10.82
Apr-23		17.23	2.78	0.01		263.17	42.39	0.13		5.95	0.96	0.00	5.95
May-23		14.53	2.34	0.01		221.94	35.75	0.11		5.02	0.81	0.00	5.02
Jun-23		14.64	2.44	0.01		223.60	37.27	0.11		5.06	0.84	0.00	5.06
Jul-23		10.28	1.99	0.01		156.97	30.38	0.08		3.55	0.69	0.00	3.55
Aug-23		12.24	1.75	0.01		186.96	26.71	0.09		4.23	0.60	0.00	4.23
Sep-23		13.17	1.95	0.01		201.07	29.79	0.10		4.55	0.67	0.00	4.55
Oct-23		20.44	1.96	0.01		312.23	29.97	0.16		7.06	0.68	0.00	7.06
Nov-23		38.51	1.28	0.02		588.11	19.60	0.29		13.30	0.44	0.01	13.30
Dec-23		14.02	1.56	0.01		214.07	23.79	0.11		4.84	0.54	0.00	4.84
Total-23		**270.22**		**0.14**		**4,127.05**		**2.06**		**93.35**		**0.05**	**93.35**
Ave-23	**39.98**		**1.97**		**2.20**		**30.09**		**33.58**		**0.68**		

Boiler #3
Natural Gas Consumption

Boiler 3	(2.5 Filterable)		PM (Condensable)			CO2 (Carbon Dioxide)				CH4 (Methane)		
	Lb/Day	Tons/ Mo	Lb/Mo	Lb/Day	Tons/ Mo	Lb/ Mo	Lb/ Day	Lb/ Hour	Tons/ Mo	Lb/ Mo	Lb/ Day	Lb/ Hour
Jan-23	0.58	0.01	50.75	1.75	0.03	1,068,351.23	36,839.70	1,534.99	534.18	20.48	0.71	0.03
Feb-23	0.52	0.01	36.14	1.57	0.02	760,922.14	33,083.57	1,378.48	380.46	14.58	0.63	0.03
Mar-23	0.82	0.01	32.47	2.47	0.02	683,484.77	52,075.03	2,169.79	341.74	13.10	1.00	0.04
Apr-23	0.96	0.00	17.86	2.88	0.01	375,954.09	60,556.36	2,523.18	187.98	7.21	1.16	0.05
May-23	0.81	0.00	15.06	2.43	0.01	317,064.11	51,070.73	2,127.95	158.53	6.08	0.98	0.04
Jun-23	0.84	0.00	15.17	2.53	0.01	319,429.05	53,238.17	2,218.26	159.71	6.12	1.02	0.04
Jul-23	0.69	0.00	10.65	2.06	0.01	224,240.00	43,401.29	1,808.39	112.12	4.30	0.83	0.03
Aug-23	0.60	0.00	12.69	1.81	0.01	267,080.00	38,154.29	1,589.76	133.54	5.12	0.73	0.03
Sep-23	0.67	0.00	13.64	2.02	0.01	287,240.00	42,554.07	1,773.09	143.62	5.51	0.82	0.03
Oct-23	0.68	0.00	21.19	2.03	0.01	446,040.37	42,819.88	1,784.16	223.02	8.55	0.82	0.03
Nov-23	0.44	0.01	39.91	1.33	0.02	840,160.00	28,005.33	1,166.89	420.08	16.10	0.54	0.02
Dec-23	0.54	0.00	14.53	1.61	0.01	305,815.81	33,979.53	1,415.81	152.91	5.86	0.65	0.03
Total-23		**0.05**	**280.05**		**0.14**	**5,895,782**			**2,947.89**	**113.00**		
Ave-23	**0.68**			**2.04**			**42,981.50**	**1,790.90**			**0.82**	**0.03**

Boiler #3
Natural Gas Consumption

Boiler 3		N2O (Nitrous Oxide)			
	Tons/ Mo	Lb/ Mo	Lb/ Day	Lb/ Hour	Tons/ Mo
Jan-23	0.01	19.59	0.68	0.03	0.01
Feb-23	0.01	13.95	0.61	0.03	0.01
Mar-23	0.01	12.53	0.95	0.04	0.01
Apr-23	0.00	6.89	1.11	0.05	0.00
May-23	0.00	5.81	0.94	0.04	0.00
Jun-23	0.00	5.86	0.98	0.04	0.00
Jul-23	0.00	4.11	0.80	0.03	0.00
Aug-23	0.00	4.90	0.70	0.03	0.00
Sep-23	0.00	5.27	0.78	0.03	0.00
Oct-23	0.00	8.18	0.79	0.03	0.00
Nov-23	0.01	15.40	0.51	0.02	0.01
Dec-23	0.00	5.61	0.62	0.03	0.00
Total-23	**0.06**	**108.09**			**0.05**
Ave-23			**0.79**	**0.03**	

Year			CH4 tons/year	CH4 lbs/day	CH4 lbs/hr	N2O tons/year	N2O lbs/day	N2O lbs/hr	CO2 tons/year	CO2 lbs/day	CO2 lbs/hr
2023	B1	NG	0.00	1.46	0.06	0.00	1.39	0.06	245.75	75,919.53	3,163.31
	B1	Oil	-	-	-	-	-	-	-	-	-
		B1 Total	**0.00**	**0.73**	**0.03**	**0.00**	**0.70**	**0.03**	**245.75**	**37,959.76**	**1,581.66**
	B2	NG	-			-			-		
	B2	Oil	-	-	-	-	-	-	-	-	-
		B2 Total	**-**	-	-	-	-	-	-	-	-
	B3	NG	0.00	1.02	0.04	0.00	0.98	0.04	158.53	53,238.17	2,218.26
	B3	Oil	-	-	-	-	-	-	-	-	-
		B3 Total	**0.00**	**1.02**	**0.04**	**0.00**	**0.98**	**0.04**	**158.53**	**53,238.17**	**2,218.26**
2023	Totals/Average		**0.01**			**0.01**			**404.28**		

Weigh Bin Calculations

Month	Bulk Limestone Receipts (lbs)	# Batches	Mix Time (min)	ft3	Grains Lost	Lbs
Jan-23	2,877,980	719	5,276	6,964,712	208,941	30
Feb-23	2,261,760	565	4,147	5,473,459	164,204	23
Mar-23	2,109,090	527	3,867	5,103,998	153,120	22
Apr-23	2,845,480	711	5,217	6,886,062	206,582	30
May-23	2,631,160	658	4,824	6,367,407	191,022	27
Jun-23	2,366,500	592	4,339	5,726,930	171,808	25
Jul-23	2,980,820	745	5,465	7,213,584	216,408	31
Aug-23	1,454,440	364	2,666	3,519,745	105,592	15
Sep-23	1,929,440	482	3,537	4,669,245	140,077	20
Oct-23	2,638,700	660	4,838	6,385,654	191,570	27
Nov-23	2,302,520	576	4,221	5,572,098	167,163	24
Dec-23	1,280,780	320	2,348	3,099,488	92,985	13
Total	**27,678,670**	**6,920**	**50,744**	**66,982,381**	**2,009,471**	**287**
Average						

	Days operating in each month	typical days/week	weeks run	approx'd weeks run
Jan-23	9.00	3.00	3.00	2
Feb-23	6.00	3.00	2.00	2
Mar-23	6.00	3.00	2.00	2
Apr-23	6.00	3.00	2.00	2
May-23	6.00	3.00	2.00	3
Jun-23	6.00	3.00	2.00	3
Jul-23	6.00	3.00	2.00	2
Aug-23	6.00	3.00	2.00	2
Sep-23	6.00	3.00	2.00	2
Oct-23	6.00	3.00	2.00	2
Nov-23	3.00	3.00	1.00	3
Dec-23	6.00	3.00	2.00	2
Total	**72.00**		**24.0**	**27.0**

Silo Calculations

# Loads	Unload Time (min)	ft3	Grains Lost	Lbs	Lbs	Tons	Lb/hr	Lb/day	TOSD Lb/day
				Report Totals					
61.89	3,714	2,391,508.54	71,745	10.25	40.10	0.02	0.505	12.12	
48.64	2,918	1,879,449.60	56,383	8.06	31.52	0.02	0.505	12.12	
45.36	2,721	1,752,585.75	52,578	7.51	29.39	0.01	0.505	12.12	
61.19	3,672	2,364,502.09	70,935	10.14	39.65	0.02	0.505	12.12	
56.58	3,395	2,186,409.08	65,592	9.37	36.66	0.02	0.505	12.12	
50.89	3,054	1,966,485.16	58,995	8.43	32.98	0.02	0.505	12.12	
64.10	3,846	2,476,965.26	74,309	10.62	41.54	0.02	0.505	12.12	
31.28	1,877	1,208,592.72	36,258	5.18	20.27	0.01	0.505	12.12	
41.49	2,490	1,603,302.40	48,099	6.87	26.89	0.01	0.505	12.12	
56.75	3,405	2,192,674.58	65,780	9.40	36.77	0.02	0.505	12.12	
49.52	2,971	1,913,319.85	57,400	8.20	32.09	0.02	0.505	12.12	
27.54	1,653	1,064,286.86	31,929	4.56	17.85	0.01	0.505	12.12	
595.24	**35,714**	**23,000,081.91**	**690,002**	**98.59**		**0.19**			
							0.51	**12.12**	**12.12**

Congoleum CORPORATION

Attachment 3:
Deviation Report for 2023

Congoleum
Acquisition, LLC

January 3rd, 2024

Daniel Davis
Maryland Department of the Environment
Air and Radiation Management Administration
1800 Washington Boulevard, Suite 715
Baltimore, Maryland 21230-1720

UA EPA Region 3
R3_APD_Permits@epa.gov

RE: Deviation Report for July through December 2023
Operating Permit No. 24-013-00013

Dear Mr. Davis:

Congoleum Acquisition, LLC has prepared this correspondence to fulfill the requirements of the Part 70 operating permit referenced above. Under Section III, Plant Wide Conditions 4.d., Congoleum is required to submit a six (6) month deviation report that confirms all required monitoring was preformed and that provides accounts of all deviations that occurred during the reporting period. The attached report indicates zero deviations during this monitoring period.

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.

Please contact me at (609) 462-8507 with any questions concerning this correspondence.

Sincerely,

Michael Marsteller

CONGOLEUM ACQUISITION, LLC
Michael Marsteller
VP HR

Attachments: July through December 2022 Deviation Report
Certification of Truth, Accuracy, and Completeness from Responsible Official

DEVIATION REPORT

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 04/30/2012

Federal Operating Permit Program (40 CFR Part 71)

6-MONTH MONITORING REPORT (SIXMON)

Section A (General Information)

Permit No. 24-013-00013

Reporting Period: Beg. 7/1/2023 End. 12/31/2023

Source / Company Name: Congoleum Acquisition, LLC

Mailing Address: Street or P.O. Box: 2700 Emory Road

City: Finksburg State: MD ZIP: 21048

Contact person: Jarret Sproull Title: EHS Director

Telephone (610) 485 - 8902

Continued on next page

Section B (Monitoring Report)

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis (describe and cite): **Permittee shall operate boilers in compliance with the monitoring requirements stated in Section 1.3 of Table IV-1 of the permit.**

Emission Units (Unit IDs): EU-3, EU-4, EU-5, and EU-6

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **Permittee shall maintain records as described in the Record Keeping Requirements portion of the permit stated in Section 1.4 of Table IV-1**

Emission Units (Unit IDs): EU-3, EU-4, EU-5, and EU-6

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **Permittee shall report non-compliance issues as described in the Reporting Requirements of the permit in Section 1.5 of Table IV-1**

Emission Units (Unit IDs): EU-3, EU-4, EU-5, and EU-6

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **Permittee shall monitor visible emissions and particulate emissions as described in the Monitoring Requirements of the permit in Section 2.3 of Table IV-2**

Emission Units (Unit IDs): EU-7

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **Permittee shall maintain records as described in the Record Keeping Requirements portion of the permit stated in Section 2.4 of Table IV-2**

Emission Units (Unit IDs): EU-7

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Section B (Monitoring Report)

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis (describe and cite): **Permittee shall report non-compliance issues as described in the Reporting Requirements of the permit in Section 2.5 of Table IV-2**

Emission Units (Unit IDs): EU-7

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite):

Emission Units (Unit IDs):

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite):

Emission Units (Unit IDs):

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite):

Emission Units (Unit IDs):

Separate Report? ___ Yes __ No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite):

Emission Units (Unit IDs):

Separate Report? ___ Yes __ No Date____/___/_____ Attachment ID _____

Section C (Deviations Already "Promptly" Reported)

Summarize all deviations from permit terms already reported on form **PDR** during the reporting period. Copy this page as many times as necessary to include all such deviations. Describe and cross-reference the permit terms and report the start and end dates and times of the deviations (mo/day/yr, hr:min). Use the 24-hour clock. Also specify the date when the written deviation report was submitted to the permitting authority (If written report required, but not submitted, leave the date field blank). Note that failure to submit a deviation report, or late submittal, is a deviation that must be reported in the Section D.

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start ____/____/________ ____:____ End:____/____/________ ____:____

Date Written Report Submitted ____/____/________

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start ____/____/________ ____:____ End:____/____/________ ____:____

Date Written Report Submitted ____/____/________

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start ____/____/________ ____:____ End:____/____/________ ____:____

Date Written Report Submitted ____/____/________

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start ____/____/________ ____:____ End:____/____/________ ____:____

Date Written Report Submitted ____/____/________

Section D (Deviations Reported Semiannually)

This section is for deviations reported for the first time in this six-month monitoring report. Describe and cross-reference the permit terms and emission units that apply to the deviation. Copy this page as many times as necessary to include all such deviations. Report the beginning and ending times (mo/day/yr, hr:min) for each deviation. Use the 24-hour clock. Briefly explain (if known) the probable cause of each deviation. If any corrective actions or preventative measures have been taken to avoid these in the future, briefly describe the measures, including when they occurred.

Permit Term (for Which There is a Deviation):

Emission Units (unit IDs)

Deviation Start: ____/____/_____ ____:____ End: ____/____/_____ ____:____

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

Permit Term (for Which There is a Deviation):

Emission Units (unit IDs)

Deviation Start: ____/____/_____ ____:____ End: ____/____/_____ ____:____

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

Permit Term (for Which There is a Deviation):

Emission Units (unit IDs)

Deviation Start: ____/____/_____ ____:____ End: ____/____/_____ ____:____

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

CERTIFICATION

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Expires 11/30/2022

Federal Operating Permit Program (40 CFR Part 71)
CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Sproull (First) Jarret (MI) ____

Title: EHS Director

Street or P.O. Box: 4401 Ridge Road

City Trainer State PA ZIP 19061 - _____

Telephone (610) 485 8902 Ext. _____ Facsimile (____) ____ - _____

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

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

Name (signed) _____

Name (typed) Jarret Sproull Date: 01 / 3 / 2024

Congoleum
Acquisition, LLC

July 11, 2023

Mr. Mitchell Gregor
Compliance Program
Maryland Department of the Environment
Air and Radiation Management Administration
1800 Washington Boulevard, Suite 715
Baltimore, Maryland 21230-1720

RE: Deviation Report for January through June 2023
Operating Permit No. 24-013-00013

Congoleum Acquisition las prepared this correspondence to fulfill the requirements of the Part 70 operating permit referenced above. Under Section III, Plant Wide Conditions 4.d, Congoleum is required to submit a six (6) month deviation report that confirms all required monitoring was preformed and that provides accounts of all deviations that occurred during the reporting period. The attached report indicated no deviations during this monitoring period.

I certify under the penalty of law 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.

If you have any questions, please contact me at (610) 731 – 5204

Sincerely,
CONGOLEUM ACEQUISITON

Jarret Sproull
EHS Director

Attached January through June 2023 Deviation Report
Certification of Truth, Accuracy and Completeness from Responsible Official

United States Environmental Protection Agency

OMB No. 2060-0336
Expires 11/30/2022

Federal Operating Permit Program (40 CFR Part 71)

6-MONTH MONITORING REPORT (SIXMON)

Section A (General Information)

Permit No. 24-013-00013

Reporting Period: Beg. 01/01/2019 End. 07/31/2024

Source / Company Name: Congoleum Acquisition, LLC

Street or P.O. Box: 2700 Emory Road

City: Finksburg State: MD ZIP: 21048

Contact person: Jarret Sproull Title: EHS Director

Telephone (609) 584 - 3000 Ext. 8902

Continued on next page

Section B (Monitoring Report)

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis (describe and cite): **Permittee shall operate boilers in compliance with the monitoring requirements stated in Section 1.3 of Table IV-1 of the permit.**

Emission Units (Unit IDs): EU-3, EU-4, EU-5, and EU-6

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **Permittee shall maintain records as described in the Record Keeping Requirements portion of the permit stated in Section 1.4 of Table IV-1**

Emission Units (Unit IDs): EU-3, EU-4, EU-5, and EU-6

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **Permittee shall report non-compliance issues as described in the Reporting Requirements of the permit in Section 1.5 of Table IV-1**

Emission Units (Unit IDs): EU-3, EU-4, EU-5, and EU-6

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **Permittee shall monitor visible emissions and particulate emissions as described in the Monitoring Requirements of the permit in Section 2.3 of Table IV-2**

Emission Units (Unit IDs): EU-7

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **Permittee shall maintain records as described in the Record Keeping Requirements portion of the permit stated in Section 2.4 of Table IV-2**

Emission Units (Unit IDs): EU-7

Separate Report? ___ Yes X No Date____/___/_____ Attachment ID _____

Section B (Monitoring Report)

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis (describe and cite): **Permittee shall report non-compliance issues as described in the Reporting Requirements of the permit in Section 2.5 of Table IV-2**

Emission Units (Unit IDs): EU-7

Separate Report? ___ Yes X No Date___/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite):

Emission Units (Unit IDs):

Separate Report? ___ Yes __ No Date___/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite):

Emission Units (Unit IDs):

Separate Report? ___ Yes __ No Date___/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite):

Emission Units (Unit IDs):

Separate Report? ___ Yes __ No Date___/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite):

Emission Units (Unit IDs):

Separate Report? ___ Yes __ No Date___/___/_____ Attachment ID _____

Section C (Deviations Already "Promptly" Reported)

Summarize all deviations from permit terms already reported on form **PDR** during the reporting period. Copy this page as many times as necessary to include all such deviations. Describe and cross-reference the permit terms and report the start and end dates and times of the deviations (mo/day/yr, hr:min). Use the 24-hour clock. Also specify the date when the written deviation report was submitted to the permitting authority (If written report required, but not submitted, leave the date field blank). Note that failure to submit a deviation report, or late submittal, is a deviation that must be reported in the Section D.

Permit Term for Which There was a Deviation:

NO DEVIATIONS

Emission Units (unit IDs):

Deviation Start ____/____/________ ____:____ End:____/____/________ ____:____

Date Written Report Submitted ____/____/________

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start ____/____/________ ____:____ End:____/____/________ ____:____

Date Written Report Submitted ____/____/________

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start ____/____/________ ____:____ End:____/____/________ ____:____

Date Written Report Submitted ____/____/________

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start ____/____/________ ____:____ End:____/____/________ ____:____

Date Written Report Submitted ____/____/________

Section D (Deviations Reported Semiannually)

This section is for deviations reported for the first time in this six-month monitoring report. Describe and cross-reference the permit terms and emission units that apply to the deviation. Copy this page as many times as necessary to include all such deviations. Report the beginning and ending times (mo/day/yr, hr:min) for each deviation. Use the 24-hour clock. Briefly explain (if known) the probable cause of each deviation. If any corrective actions or preventative measures have been taken to avoid these in the future, briefly describe the measures, including when they occurred.

Permit Term (for Which There is a Deviation):

NO DEVIATIONS

Emission Units (unit IDs):

Deviation Start: ____ :____ End: ____:____

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

Permit Term (for Which There is a Deviation):

Emission Units (unit IDs)

Deviation Start: ____/____/_____ ____:____ End: ____/____/_____ ____:____

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

Permit Term (for Which There is a Deviation):

Emission Units (unit IDs)

Deviation Start: ____/____/_____ ____:____ End: ____/____/_____ ____:____

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Expires 11/30/2022

Federal Operating Permit Program (40 CFR Part 71)
CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Sproull (First) Jarret (MI) ____

Title: EHS Director

Street or P.O. Box: 4401 Ridge Road

City Trainer State PA ZIP 19061 - _____

Telephone (609) 462-8902 Ext. _____ Facsimile (____) ____ - _____

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

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

Name (signed) Jarret Sproull

Name (typed) Jarret Sproull Date: 07 / 12 / 2023

Congoleum CORPORATION

Attachment 4:
2023 Annual Compliance Certification Report

Congoleum
Acquisition, LLC

January 3rd, 2024

Daniel Davis
Maryland Department of the Environment
Air and Radiation Management Administration
1800 Washington Boulevard, Suite 715
Baltimore, Maryland 21230-1720

UA EPA Region 3
R3_APD_Permits@epa.gov

RE: Deviation Report for July through December 2023
Operating Permit No. 24-013-00013

Dear Mr. Davis:

Congoleum Acquisition, LLC has prepared this correspondence to fulfill the requirements of the Part 70 operating permit referenced above. Under Section III, Plant Wide Conditions 4.d., Congoleum is required to submit a six (6) month deviation report that confirms all required monitoring was preformed and that provides accounts of all deviations that occurred during the reporting period. The attached report indicates zero deviations during this monitoring period.

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.

Please contact me at (609) 462-8507 with any questions concerning this correspondence.

Sincerely,

Michael Marsteller

CONGOLEUM ACQUISITION, LLC
Michael Marsteller
VP HR

Attachments: July through December 2022 Deviation Report
Certification of Truth, Accuracy, and Completeness from Responsible Official

CERTIFICATION OF PLANT-WIDE CONDITIONS
SECTION III OF PART 70 OPERATING PERMIT

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

1. **Particulate Matter from Construction and Demolition**

   Not applicable. There were no construction or demolition projects during the reporting period.

2. **Open Burning**

   The Company did no open burning during the reporting period.

3. **Air Pollution Episode (N/A)**

   Not Applicable.

4. **Report of Excess Emissions and Deviations**

   There were no excess emissions during the reporting period.

5. **Accidental Release Provisions (if applicable)**

   Not applicable.

6. **General Testing Requirements**

   The Department has not required testing.

7. **Emissions Test Methods**

   No testing has been required.

8. **Emission Certification Report**

   a. Report to be submitted by April 1.
   b. The information submitted was accurate to the preparer's best knowledge.
   c. Records are maintained as required.

9. **Compliance Certification Report**

   Compliance Certification Report submitted to MDE and EPA by April 1. All required sections addressed in report.

10. **Certification by Responsible Official**

    Forms, reports, and compliance certifications have been certified by a responsible official using the required statement.

CERTIFICATION OF PLANT-WIDE CONDITIONS
SECTION III OF PART 70 OPERATING PERMIT
(CONTINUED)

11. Sampling and Emissions Testing Record Keeping

Not applicable. No sampling or emissions tests performed during this reporting period.

12. General Record Keeping

All required records maintained on-site for a period of at least 5 years.

13. General Conformity (N/A except for federal facilities)

Not applicable.

14. Asbestos Provisions (if applicable)

Not applicable.

15. Ozone Depleting Regulations (if applicable)

Not applicable.

16. Acid Rain Permit (if applicable)

Not applicable.

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 11/30/2022

Federal Operating Permit Program (40 CFR Part 71)
ANNUAL COMPLIANCE CERTIFICATION (A-COMP)

A. GENERAL INFORMATION

Permit No. 24-013-00013

Reporting Period: Beg. 01/01/2023 End: 12/31/2023

Source / Company Name: Congoleum Acquisitions, LLC

Mailing Address: Street or P.O. Box: 2700 Emory Road

City: Finksburg State: MD ZIP: 21048

Contact person: Jarret Sproull Title: EHS Director

Telephone (610) 485 8902 Ext.

Continued on next page

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): EU-03, E-04, E-05, E-06 (Boilers)

Permit Term (Describe requirements and cross-reference)

1.1A: COMAR 26.11.09.05A(2) – Fuel Burning Equipment

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

During the reporting period, visual observations for emissions were conducted while operating Boiler Units 3, 4, 5 on No. 2 fuel oil. (Unit 6 is out of service) No visible emissions were observed from any of the units regulated by this condition.

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, start up, or adjustments or occasional cleaning of control equipment if:

(1) The visible emissions are not greater than 40 percent opacity; and
(2) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period."

1.1B: COMAR 26.11.09.06B(6) – Control of Particulate Matter

(a) Fuel burning equipment burning gas with an interruptible gas service is exempt from the provisions of §B(1) and (2). "Interruptible gas service" means a gas service negotiated between the user and a utility company under the jurisdiction of the Maryland Public Service Commission in which the utility company reserves the right to interrupt the gas supply after notification or to limit the gas supply by automatic interruption upon determining that gas supplies are inadequate for normal distribution.

Facility does have interruptible gas service agreement with utility company.

1.1C: COMAR 26.11.09.07A – Control of Sulfur Oxides

"A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of which otherwise exceeds the following limitations: (2) In Areas III and IV: (b) distillate fuel oils, 0.3 percent."

Sulfur content of fuel delivered is less than 0.3 percent.

1.1D: COMAR 26.11.09.08B(5) – Operator Training

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

(b)The operator training course sponsored by the Department shall include an in-house training

course that is approved by the Department."

Only qualified boiler operators maintains the equipment and makes the necessary adjustments. Operators have been trained and records kept with personnel file.

COMAR 26.11.09.08E – Requirements for Fuel-Burning Equipment with a rated Heat Input Capacity of 100 million BTU per hour or less.

"A person who owns or operates fuel-burning equipment with a rated heat input capacity of 100 Million Btu per hour or less shall:

(1) Submit to the Department an identification of each affected installation, the rated heat input capacity of each installation, and the type of fuel burned in each;

(2) Perform a combustion analysis for each installation at least once each year and optimize combustion based on the analysis;

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

(4) Once every 3 years, require each operator of the installation to attend operator training programs on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and

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

For each boiler with a heat input capacity less than 100 MMBTU/hr, Congoleum has submitted the capacity and fuel type for each unit.

Combustion analysis performed through 3rd party vendor. All optimizations based on analysis were performed. Records are maintained in the boiler room.

Training records for each boiler operator is kept on-site and available to the MDE upon request.

1.1E: COMAR 26.11.02.09A – Operational Limitations

The Permittee shall maintain an interruptible gas service with a utility company under the jurisdiction of the Maryland Public Service Commission and shall combust natural gas as the primary fuel and distillate (No. 2) oil as the backup fuel during period of interruption or during periods of routine maintenance or testing.

Contract is maintained with utility company

1.4 Record Keeping Requirements:

(A.1) An operation manual and preventive maintenance plan have been maintained onsite.

(A.2) Documents pertaining to inspections, adjustments and/or repairs performed on the boilers are retained on-site for five years.

(A.3) Visible emission observations are documented and made available to the Department upon request. These documents are retained on-site for five years.

(A.4) The number of hours each boiler operates on No. 2 fuel oil is recorded and maintained on-site for five years.

(C) Documents certifying the sulfur content of fuel oil received are retained on-site for five years. These documents have been made available to Department at their request.

(D.1) Records of the annual combustion analysis have been retained onsite.

(D.2) Records of required training for each operator have been retained onsite.

(E) Records of the quantity and types of fuel burned have been retained onsite.

1.5 Reporting Requirements:

(A) There have been no incidents of visible emissions. Therefore, "Reports of Excess Emissions and Deviations" have not been submitted or required.

(B) There has been no request for contracts to be submitted. However, it is available on-site and shall be submitted if so requested.

(C) There has been no request for fuel supplier certification to be submitted. However, it is available onsite and shall be submitted if so requested.

(D.1) There has been no request for combustion analysis to be submitted. However, it is available onsite and shall be submitted if so requested.

(D.2) There has been no request for training program attendance to be submitted. However, it is available onsite and shall be submitted if so requested.

(E.) Records of the quantity and type of fuels burned have been submitted with the annual emission certification report.

Status (Check one): Intermittent Compliance X Continuous Compliance

Emission Unit ID(s): EU-07 Bulk Receiving System (06-9-0024)

Permit Term (Describe requirements and cross-reference):

2.1: (A.) COMAR 26.11.06.02C(2) – Visible Emissions

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

(B.) COMAR 26.11.06.03B(2)(a) – Control of Particulate Matter

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

Compliance Methods for the Above (Description and Citation):

2.2 Testing Requirements:

(A.) No testing is required for visible emissions.

(B.) No testing is required for particulate matter.

2.3 Monitoring Requirements:

(A.) Visual observations have been conducted at least quarterly when raw materials were being processed and records have been retained on-site. No visible emissions have been observed from the system regulated by this condition.

(B.) An operations manual and preventative maintenance plan have been maintained throughout the year. A log of maintenance activities with the dates and description of the preventative maintenance performed has been retained onsite.

2.4 Record Keeping Requirements:

(A.) A log of the dates and results of visible emission observations have been retained onsite for at least five years.

(B.) A copy of the preventive maintenance plan and a record of the dates and description of the maintenance activities performed have been retained onsite. There have been no baghouse malfunctions during this reporting period.

2.5 Reporting Requirements:

(A.) There have been no incidents of visible emissions during this reporting period. Therefore, "Reports of Excess Emissions and Deviations" have not been submitted or required.

(B.) There are no reporting requirements for particulate matter.

Status (Check one): ___ Intermittent Compliance X Continuous Compliance

Section V – Insignificant Activities

(3) Stationary internal combustion engines with an output less than 500 brake horsepower (373 kW) and which are not used to generate electricity for sale or for peak or load shaving;

For 125 kW (167 HP) Caterpillar Olympian diesel powered emergency generator:

40 CFR, Subpart 63 – Stationary RICE

Operators of an existing RICE located at an area source of HAP emissions must comply with Tables 2d and 2b of this subpart.

COMAR 26.11.09.05E(2) – Control of Visible Emissions

Emissions during Idle Mode. Limits discharge of emissions from any engine operating at idle greater than 10 percent opacity.

COMAR 26.11.09.05E(3)

Limits discharge of emissions from any engine operating at other than idle conditions greater than 40 percent opacity.

COMAR 26.11.09.05E(4) - Exceptions

(a) Section E(2) for any period of 2 consecutive minutes after idling period of 15 consecutive minutes for the purposes of clearing the exhaust system.

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

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

(ii) All other engines: 15 minutes

(c) Exception for E(2) and (3) when maintenance, repair, or testing is being performed by qualified mechanics.

COMAR 26.11.09.07A(1) – Control of Sulfur Oxides

Limits fuel sulfur content in distillate fuel oils to 0.3%.

40 CFR Subpart 63– Operational Limit

Engine must be operated and maintained according to manufacturer's emission-related emissions instructions or a developed maintenance plan consistent with good air pollution control practice.

40 CFR Subpart 63.6625(i)

Allows for an oil analysis program to be used instead of replacing engine fuel oil at the frequency specified in Table 2d of this subpart.

40 CFR Subpart 63.6625(h)

Minimize time spent idle during startup and the startup time to a period needed for safe loading of the engine and not to exceed 30 minutes.

3.2 Testing Requirements:

(A.) No testing is required for NESHAP.

(B.) No testing is required for visible emissions.

(C.) No testing is required for sulfur oxides.

(D.) No testing is required for operational limits.

3.3 Monitoring Requirements:

(A.) Oil and filters have been changed annually because the engine did not run more than 500 hours in the calendar year. The air cleaner, hoses, and belts have been inspected annually.

(B.) Engine is operated and maintained in a manner to reduce visible emissions. An operating and preventative maintenance plan is in place on site to meet this requirement.

(C.) Documentation has been provided by the fuel supplier certifying the sulfur content for each batch of fuel oil delivered. These records have been made available to the Department and will be retained on-site for at least five years.

(D.) No monitoring is required for operational limits.

3.4 Record Keeping Requirements:

(A.) All notifications and reports relating to the emergency generator are maintained on-site for at least 5 years. All malfunctions, corrective actions, and maintenance events are recording and maintained on site for up to 5 years.

(B.) All records of preventative maintenance are on-site and maintained for at least 5 years.

(C.) Documents certifying the sulfur content of fuel oil received are retained on-site for five years. These documents have been made available to Department at their request.

(D.) No record keeping is required for operational limits.

3.5 Reporting Requirements:

(A.) The engine has not been operated in excess of the limited hours for the purposes specified for emergency generators in 40 CFR 63.6640(f). No annual reports are necessary because the engine has not exceeded these limits in the calendar year.

(B.) There have been no incidents of visible emissions during this reporting period. Therefore, "Reports of Excess Emissions and Deviations" have not been submitted or required.

(C.) There has been no request for fuel supplier certification to be submitted. However, it is available onsite and shall be submitted if so requested.

(D.) No reporting is required for operational limits.

Status (Check one): ___ Intermittent Compliance X Continuous Compliance

C. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

Report all deviations from permit terms (whether reported previously or not) that occurred during the permit term. Cross-reference deviations already reported in the six-month report. Indicate whether each deviation is a "possible exception to compliance." Start and end period of each deviation should be in mo/day/yr, hr:min format (24-hour clock). Also, specify the date when the written deviation report was submitted (If written report required, but not submitted, leave the date field blank).

Permit Term for Which There was a Deviation: Emission Units (unit IDs): Deviation Start:_____ End: _____ Date Written Report Submitted:
Permit Term for Which There was a Deviation: Emission Units (unit IDs): Deviation Start:_____ End: _____ Date Written Report Submitted:
Permit Term for Which There was a Deviation: Emission Units (unit IDs): Deviation Start:_____ End: _____ Date Written Report Submitted:

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Sproull (First) Jarret (MI)

Title: EHS Director

Street or P.O. Box: 4401 Ridge Road

City: Trainer State: PA ZIP: 19061

Telephone (610) 485 8902 Ext. Facsimile (____) _____ - _____

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

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

Name (signed) _____

Name (typed): Jarret Sproull Date: 01/18/2024

Congoleum CORPORATION

Attachment 5:
Checklist of Insignificant activities

MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
RENEWAL TITLE V APPLICATION INSIGNIFICANT ACTIVITIES LIST

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) No. 0 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. 0 Fuel-burning equipment using solid fuel and having a heat input of less than 350,000 Btu (0.37 gigajoule) per hour;

(3) No. 3 Stationary internal combustion engines with less than 500 brake horsepower (373 kilowatts)of power output

(4) 12 Space heaters utilizing direct heat transfer and used solely for comfort heat;

(5) 1 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. 4 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

(7) 5 Commercial bakery ovens with a rated heat input capacity of less than 2,000,000 Btu per hour;

(8) 0 Kilns used for firing ceramic ware, heated exclusively by natural gas, liquefied petroleum gas, electricity, or any combination of these;

(9) 0 Confection cookers where the products are edible and intended for human consumption;

(10) 0 Die casting machines;

(11) 0 Photographic process equipment used to reproduce an image upon sensitized material through the use of radiant energy;

(12) 12 Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;

(13) 0 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) 0 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) 0 Containers, reservoirs, or tanks used exclusively for electrolytic plating work, or electrolytic polishing, or electrolytic stripping of brass, bronze, cadmium, copper, iron, lead, nickel, tin, zinc, and precious metals;

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

(a) 0 Dipping operations for applying coatings of natural or synthetic resins that contain no VOC;

(b) 0 Dipping operations for coating objects with oils, waxes, or greases, and where no VOC is used;

(c) 37 Storage of butane, propane, or liquefied petroleum, or natural gas;

(d) No. 3 Storage of lubricating oils:

(e) No. 0 Unheated storage of VOC with an initial boiling point of 300 °F (

(f) No. 2 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel,

(g) No. 0 Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;

(h) No. 4 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) 0 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) 0 Aluminum or any alloy containing over 50 percent aluminum, if no gaseous chloride compounds, chlorine, aluminum chloride, or aluminum fluoride is used;

(b) 0 Magnesium or any alloy containing over 50 percent magnesium;

(c) 0 Lead or any alloy containing over 50 percent lead;

(d) 0 Tin or any alloy containing over 50 percent tin;

(e) 0 Zinc or any alloy containing over 50 percent zinc;

(f) 0 Copper;

(g) 0 Precious metals;

(19) 6 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) 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;

(21) 0 Certain recreational equipment and activities, such as fireplaces, barbecue pits and cookers, fireworks displays, and kerosene fuel use;

(22) 1 Potable water treatment equipment, not including air stripping equipment;

(23) 0 Firing and testing of military weapons and explosives;

(24) 0 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) 0 Comfort air conditioning subject to requirements of Title VI of the Clean Air Act:

(26) 7 Grain, metal, or mineral extrusion presses;

(27) 8 Breweries with an annual beer production less than 60,000 barrels;

MARYLAND DEPARTMENT OF THE ENVIRONMENT
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RENEWAL TITLE V APPLICATION INSIGNIFICANT ACTIVITIES LIST

(28) 0 Natural draft hoods or natural draft ventilators that exhaust air pollutants into the ambient air from manufacturing/industrial or commercial processes;

(29) 5 Laboratory fume hoods and vents;

(30) No. 0 Sheet-fed letter or lithographic printing press(es) with a cylinder width of less than 18 inches;

For the following, attach additional pages as necessary:

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

No. 1 Paper Machine with Hydropulper and Scrubber

No. 1 Unloading System

No. 1 Transfer System

No. 1 Wastewater Treatment System

No. ___

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

No. ___

No. ___

No. ___

Congoleum CORPORATION

Attachment 6:
Budget Reconciliation and Financing Act Form

MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Suite 720 • Baltimore, Maryland 21230-1720

410-537-3000 • 800-633-6101 • http://www.mde.maryland.gov

Air and Radiation Administration • Air Quality Permits Program

Budget Reconciliation and Financing Act of 2003
(Commonly referred as Maryland House Bill 935)

On July 1, 2003, House Bill 935, Chapter 203 amended § 1-203 of the Environment Article, Annotated Code of Maryland, as follows:

Section 1-203(b).
(1) A license or permit is considered renewed for purposes of this subsection if the license or permit is issued by a unit of State government to a person for the period immediately following a period for which the person previously possessed the same or a substantially similar license.
(2) Before any license or permit may be renewed under this article, **the issuing authority shall verify through the office of the Comptroller (emphasis added)** that the applicant has paid all undisputed taxes and the unemployment insurance contributions payable to the Comptroller or the Secretary of Labor, Licensing, and Regulation or that the applicant has provided for payment in a manner satisfactory to the unit responsible for collection.

In order for the Maryland Department of the Environment (MDE) to verify this compliance, we would need you to provide the following information before we can process or issue your renewal license, permit, or certification:

Current MDE License/Permit No.: 24-013-00013

Name of Licensee or Permit Holder: Congoleum Corporation

Address: 2700 Emory Road Finksburg, MD 21048

Contact Name: Jarret Sproull **Title:** EHS Director

Contact Telephone Number: (610) 485 8902

Privacy Act Notice: This Notice is provided pursuant to the Federal Privacy Act of 1974, 5 U.S.C. § 552a. Disclosure of your Social Security or Federal Tax Identification on this form is mandatory pursuant to the provisions of § 1-203 (2003) of Environment Article, Annotated Code of Maryland, which requires MDE to verify that an applicant for a permit or license has paid all undisputed taxes and unemployment insurance. Social Security and Federal Tax Identification Nos. will not be used for any purposes other than those described in this Notice.

Federal Employer Identification Number (FEIN): 02-0398678

Certification: I certify that the above information is true and correct to the best of my knowledge.

Jarret Sproull — Signature

6/6/2024 — Date

Complete and return this form to Sena Harlley at the above address. If you have any questions, please contact Ms. Harlley at (410) 537-3251.