



**AIR AND RADIATION ADMINISTRATION  
DRAFT PART 70 OPERATING PERMIT**

**DOCKET #24-027-0052**

**COMPANY:** Maryland & Virginia Milk Producers  
Cooperative Association, Inc.

**LOCATION:** 8321 Leishear Road  
Laurel, MD 20723

**CONTENTS:**

<u>ITEM</u>	<u>DESCRIPTION</u>
1	Overview of the Part 70 Program
2	Notice of Opportunity for a Public Hearing
3	Fact Sheet
4	Draft Permit
5	Part 70 Permit Application

**MARYLAND DEPARTMENT OF THE ENVIRONMENT  
AIR AND RADIATION ADMINISTRATION  
AIR QUALITY PERMITS PROGRAM  
TITLE V – PART 70 OPERATING PERMIT PROGRAM OVERVIEW**

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

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

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

**Public Participation Process**

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

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

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

**Citizen Petition to EPA to Object to Permit Issuance**

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

**Applicant Objection to Permit Issuance and Recourse**

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

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

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

The Department of the Environment, Air and Radiation Administration (ARA) has completed its review of the application for a Renewal Part 70 Operating Permit submitted by the Maryland & Virginia Milk Producers (MD & VA Milk Producers) Cooperative Association, Inc., located in Laurel, MD. The facility consists of one natural gas-fired Keeler boiler, one dual-fueled Clever Brooks boiler and one natural gas-fired Niro compact spray dryer.

The applicant is represented by:

Mr. John Rees, Director of Operations  
MD & VA Milk Producers Cooperative Associations, Inc.  
8321 Leishear Road  
Laurel, MD 20723

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](mailto: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.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

---

**BACKGROUND**

The Maryland and Virginia Milk Producers Association Incorporated, henceforth referred to as Maryland and Virginia Milk or MDVA Milk, is located at 8321 Leishear Road in Laurel, Howard County, Maryland. It lies within Maryland's air pollution area III. The facility, which is owned by a cooperative of 1600 member farmers from a ten-state region stretching from the Mid Atlantic area to the South.

The facility serves to balance the local fluid milk market during periods when supply exceeds demand. Excess raw milk is converted into non-perishable forms: condensed milk, powdered milk, and butter. The raw milk is separated into cream and skim. The cream is pasteurized and churned to produce butter (secondary SIC 2021). The skim is condensed to produce skim condensed milk and then spray dried to produce non-fat powdered milk (primary SIC 2023). The facility currently receives, on average, 40 trailer loads of milk per day each carrying about 5,550 gallons.

Installations at the facility are comprised of one (1) 12 ton per hour natural gas fired Niro spray dryer used for drying milk, and two process boilers – one (1) 49 MMBtu/hour natural gas fired Keeler boiler and one (1) 29 MMBtu/hour natural gas and No. 2 fuel-oil fired Cleaver Brooks boiler. The Keeler boiler was installed in 1979 and the Cleaver Brooks boiler was installed in 2004. The Cleaver Brooks boiler is subject to the New Source Performance Standard (NSPS) Subpart Dc because it was installed after the applicability date of June 9, 1989. Usually, only one boiler operates at a time; the other boiler is used as backup. Emissions from this facility consist primarily of criteria pollutants from the combustion of natural gas and No. 2 fuel oil.

The New Emissions Standard of Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, And Institutional Boilers Area Sources (40 CFR Part 63, Subpart JJJJJJ) applies to each new, reconstructed, or existing affected source as defined in the subpart. The boilers located at Maryland and Virginia Milk fall under existing boiler category as defined in this subpart because the construction or reconstruction of the boilers commenced on or before June 4, 2010. The subpart provides exemption for some boilers including boilers that meet the definition of "a gas fired boiler" in Section 63.11195. A gas fired boiler is defined in this Subpart, in Section 63.11237 to "include any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuels only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year."

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

On the basis of this exemption provision, Maryland and Virginia Milk has informed the Maryland Department of the Environment (the Department) in an email dated May 14, 2014, that its boilers meet the definition of “gas-fired boilers” as defined in this Subpart and therefore are exempt from the requirements of 40 CFR Part 63, Subpart JJJJJJ. Maryland and Virginia Milk is required to maintain records of fuel utilization at these boilers and the reasons for combusting the fuels (such as testing, readiness, etc.) as well as the length of time the fuels were combusted. If Maryland and Virginia Milk’s situation changes such that its boilers no longer qualify as gas-fired boilers, the Company will have 180 days to comply with the provisions of this Subpart.

The following table summarizes the actual emissions from Maryland and Virginia Milk Producers Association Incorporated based on its most recent Annual Emission Certification Reports:

**Table 1: Actual Emissions**

Year	NO <sub>x</sub> (TPY)	SO <sub>x</sub> (TPY)	PM <sub>10</sub> (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2023	4.89	0.08	15.85	6.29	0.75	<1
2022	7.02	0.08	9.02	8.89	0.77	<1
2021	5.97	0.09	16.61	7.53	0.85	<1
2020	5.36	0.09	18.31	6.87	0.84	<1
2019	4.48	0.07	14.02	5.82	0.67	<1

Maryland and Virginia Milk has the potential to emit NO<sub>x</sub> emissions of 25 tons or greater per year. Therefore, the source is subject to the requirements of Title V Operating Permit Program (COMAR 26.11.03). As a potential major source of NO<sub>x</sub>, the facility is also subject to the NO<sub>x</sub> RACT (Reasonable Available Control Technology) requirements of COMAR 26.11.09.08.

Pursuant to COMAR 26.11.03, Maryland and Virginia Milk submitted a Part 70 Operating Permit renewal application, which the Department received on February 1, 2024. The existing Part 70 Operating Permit expires on July 31, 2024. An administrative completeness review was conducted and the application was found to be administratively complete. The completeness determination letter was sent to the company on March 28, 2024 granting the facility an application shield.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

**GREENHOUSE GAS (GHG) EMISSIONS**

Maryland and Virginia Milk emits the following greenhouse gases (GHGs) related to the Clean Air Act requirements: carbon dioxide and methane and Nitrous Oxide. These GHGs are generated from the Niro dryer, Cleaver -Brooks and Keeler boilers.

The facility is currently not subject to any applicable GHG Clean Air Act requirements because it has not met the GHG applicability threshold under the Clean Air Act. To be subject to the GHG requirements, first, it has to trigger the Prevention of Significant Deterioration (PSD) requirements for GHG emissions by undergoing a major modification and the facility has to emit GHG at a major source level (threshold: 100,000 tpy CO<sub>2</sub>e). Second, Maryland and Virginia Milk does not emit greenhouse gases at the major source level as evidenced by the annual GHG emissions as shown in Table 2 below. Therefore, there are no applicable GHG Clean Air Act requirements at this time. However, the Permittee is required to continue to quantify its facility-wide GHG emissions and report them in accordance with Section 3 of the Part 70 permit.

The following table summarizes the actual emissions from Maryland and Virginia Milk Producers Association Incorporated based on its Annual Emission Certification Reports:

**Table 2: Greenhouse Gases Emissions Summary**

<b>GHG</b>	<b>Conversion factor</b>	<b>2019 (tpy CO<sub>2</sub>e)</b>	<b>2020 (tpy CO<sub>2</sub>e)</b>	<b>2021 (tpy CO<sub>2</sub>e)</b>	<b>2022 (tpy CO<sub>2</sub>e)</b>	<b>2023 (tpy CO<sub>2</sub>e)</b>
Carbon Dioxide CO <sub>2</sub>	1	14,823.40	18,304.50	18,442.09	16,814.99	16,329.44
Methane CH <sub>4</sub>	25	7.07	8.75	8.75	8.00	7.75
Nitrous Oxide N <sub>2</sub> O	298	25.68	26.82	26.82	26.82	26.82
Total GHG CO <sub>2</sub> eq		<b>14,856</b>	<b>18,340</b>	<b>18,477</b>	<b>16,843</b>	<b>16,364</b>

**Compliance Assurance Monitoring (CAM)**

Maryland and Virginia Milk Producers Association Incorporated 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

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

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 pre-control emissions of at least 100% of the major source amount; and must not otherwise be exempt from CAM. Applicability determinations are made on a pollutant-by-pollutant basis for each emissions unit.

Maryland and Virginia Milk has documented that it uses baghouses and cyclones to recover dry milk powder in the exhaust stream from the Niro compact spray dryer at their facility. These baghouses and cyclones meet the definition of "inherent process equipment" that, according to 40 CFR Part 64, is "necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations." Therefore, these baghouses and cyclones are not considered control devices under the CAM rule and are exempt from the requirements of a CAM plan.

**EMISSION UNIT IDENTIFICATION**

Maryland and Virginia Milk has identified the following emission units as being subject to Title V permitting requirements and having applicable requirements.

**Table 3: Emission Unit Identification**

<b>Emissions Unit Number*</b>	<b>MDE - ARA Registration Number</b>	<b>Emissions Unit Name and Description</b>	<b>Date of Installation</b>
EU-1	027-0052 -5-0065	One (1) 49 MMBtu/hr natural gas-fired Keeler boiler.	1979
EU-3	027-0052 -5-0209	One (1) 29 MMBtu/hr Cleaver Brooks boiler, permitted to burn natural gas and No. 2 fuel oil.	2004

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

EU-5	027-0052 -8-0052	One (1) 12 ton per hour natural gas-fired Niro compact spray dryer, equipped with three cyclones and two baghouses for product recovery.	1995
------	---------------------	--	------

\*Gaps in EU (Emissions Unit) designation indicate units that have been decommissioned and removed from the facility.

### **AN OVERVIEW OF THE PART 70 PERMIT**

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

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

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

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

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



**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

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

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

**REGULATORY REVIEW/TECHNICAL REVIEW/COMPLIANCE  
METHODOLOGY**

**Emissions Unit: EU-1**

**[MDE ARA Reg No. 027-0052-5-0065]**

One (1) 49 MMBtu/hr natural gas-fired Keeler boiler, constructed in 1979.

EU-1 is a natural gas or propane fired Keeler Boiler as described in Table 3 above. It was constructed in 1979 and has not undergone any major modification or reconstruction since installation. Therefore, it is not subject to the New Source Performance Standard (NSPS) requirements cited at 40 CFR Subpart Dc, which apply to installations whose construction, modification or reconstruction commenced after June 9, 1989.

EU-1 is not configured to burn oil; it can only burn natural or propane gas. Therefore, references to seeking approval to burn alternative fuels have been deleted from the fact sheet and the permit.

**Applicable Standards and Limits:**

**A. Visible Emissions Limitations**

**COMAR 26.11.09.05A(2) – Fuel Burning Equipment.**

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

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

**COMAR 26.11.09.05A(3) – Exceptions.**

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

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

**Compliance Demonstration:**

The Permittee shall comply with this regulation by properly operating and maintaining the boiler in a manner that prevents visible emissions. Specifically, the Permittee is required to:

- (a) Properly operate and maintain the boiler; and
- (b) Maintain an operations training manual and preventive maintenance plan.

The Permittee shall maintain a log of maintenance performed on the boilers and operations training provided to the boiler operators, and shall report on a semi-annual basis incidents of visible emissions in accordance with permit condition 4 of Section III, Plant Wide Conditions, “Report of Excess Emissions and Deviations.” **[Authority: COMAR 26.11.03.06C].**

No scheduled visible emissions observations are required for the unit.

**Rationale for/Discussion of Periodic Monitoring:**

Visible emissions associated with burning of natural gas will only occur during periods of improper combustion, which would not be allowed to continue due to safety considerations. Therefore, no observation will be required when burning natural gas.

The Permittee shall report the incidence of visible emissions in accordance with permit condition 4 of Section III, Plant Wide Conditions, “Report of Excess Emissions and Deviations.” **[Authority: COMAR 26.11.03.06C].**

**Compliance Status:**

The Department received the company’s 2023 Compliance Certification Report on March 18, 2024 Report for the entire year - equivalent of two semi-annual reports spanning the period from January 1, 2023 to December 31, 2023. No visible emissions observations were reported.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

**B. Control of Nitrogen Oxides**

Note: These NO<sub>x</sub> RACT requirements apply to both EU-1 and EU-3.

**COMAR 26.11.09.08B(5) – Operator Training.**

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

**COMAR 26.11.03.06C(5)(g) – Monitoring, Record Keeping, and Reporting.**

“(g) The retention of records of all monitoring data and support information for a period of 5 years or longer, as specified by the Department, from the date of the monitoring sample, measurement, application, or report.”

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

**Compliance Demonstration:**

The Permittee is required to perform a combustion analysis for each installation at least once each year and optimize combustion based on the analysis. The Permittee is also required to maintain the results of the combustion analysis at the site for 5 years, and prepare and maintain a record of training program attendance for each operator at the site. In addition, the Permittee is required to make available the results of the combustion analysis and records of training program attendance for each operator to the Department upon request. **[Authority: COMAR 26.11.09.08E(2)].**

**Compliance Status:**

The Permittee continues to comply with the requirements of this regulation with respect to combustion analysis and optimization, operators' training, recordkeeping and reporting. The Permittee conducted combustion analyses and optimizations on both the Keeler boiler and Cleaver Brooks boilers on May 22, 2023. Boiler operation and safety training was conducted on Jun 17, 2021.

---

**Emissions Unit: EU-3**

**[MDE ARA Reg No. 027-0052-5-0209]**

One (1) 29 MMBtu/hr Cleaver Brooks boiler, permitted to burn natural gas and No. 2 fuel oil, constructed in 2004.

EU-3 is a Cleaver Brooks boiler rated at 29 MMBtu/hr heat input and configured to burn natural gas and No. 2 fuel oil. This boiler was installed in 2004 and as a result, is subject to 40 CFR Part 60 Subpart Dc, the National Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units whose construction commenced after June 9, 1989.

**Applicable Standards and Limits:**

**A. Visible Emissions Limitations**

**COMAR 26.11.09.05A(2) – Fuel Burning Equipment.**

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

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

**COMAR 26.11.09.05A(3) – Exceptions.**

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

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

The opacity limit of **40 CFR Part 60.43c(c)** is not applicable because the boiler is rated less than 30 MMBTU/hr.

**Compliance Demonstration:**

The Permittee shall:

- (1) Properly operate and maintain the boilers in a manner to prevent visible emissions;
- (2) Maintain an operations manual and preventive maintenance plan; and
- (3) 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:

- (1) Inspect combustion system and boiler operations;
- (2) Perform all necessary adjustments and/or repairs to the boiler within 48 hours, so that visible emissions are eliminated;
- (3) Document in writing the results of inspections, adjustments and/or repairs to the boiler; and
- (4) 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]**

The Permittee shall maintain a log of the results of visible emissions observations performed on site for at least 5 years and make the log available to the

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

Department's representative upon request. Furthermore, the Permittee is required to report on a semi-annual basis those periods when visible emissions are observed as required by Permit Condition 4 of Section III, "Report of Excess Emissions and Deviations". **[Authority: COMAR 26.11.03.06C]**

**Rationale for/Discussion of Periodic Monitoring:**

Visible emissions associated with natural gas burning will only occur during periods of improper combustion, which would not be allowed to continue due to safety considerations. Therefore, no observation will be required when burning natural gas. Visible emissions from the combustion of No. 2 fuel oil are possible, but unlikely with good operation and maintenance. In the event of natural gas unavailability compelling the Permittee to result to using No. 2 fuel oil, the Permittee is required to perform a visual observation once every 168 hours (one week) of fuel oil combustion. If the total hours of burning fuel oil are less than 100 hours, the visible emissions observation requirement is waived.

Regardless of the schedule for performing required visible observations, whenever visible emissions are observed, the Permittee is required to report the incident in accordance with Permit Condition 4 of Section III "Report of Excess Emissions and Deviations."

**Compliance Status:**

The Permittee continues to comply with these requirements by properly operating and maintaining the boiler, and maintaining an operations training manual and preventive maintenance plan. The Department received the company's 2023 Compliance Certification Report on March 18, 2024 for the entire calendar year (the period spanning January 1, 2023 to December 31, 2023). No visible emissions observations were reported.

**B. 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."

**40 CFR §60.42c – Standard for sulfur dioxide (SO<sub>2</sub>).**

**§60.42c(d)** "On and after the date on which the initial performance test is completed or required to be completed under § 60.8, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO<sub>2</sub> in excess of 215 ng/J (0.50 lb/MMBtu) heat input from oil; or, as an alternative, no owner or operator of an affected facility that combusts oil

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. The percent reduction requirements are not applicable to affected facilities under this paragraph.”

**§60.42c(h)** “For affected facilities listed under paragraphs (h)(1), (2), (3), or (4) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under § 60.48c(f), as applicable.

- (1) Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr).
- (2) Residual oil-fired affected facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr).
- (3) ...
- (4) ...”

Note: The monitoring, record keeping, and reporting requirements under NSPS Subpart Dc will be used to demonstrate compliance with **COMAR 26.11.09.07A(2)(b)**.

**Compliance Demonstration:**

The Permittee shall demonstrate compliance by obtaining fuel suppliers’ certification, which shall include the following information:

- (1) For distillate oil:
  - (a) The name of the oil supplier;
  - (b) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in § 60.41c; and
  - (c) The sulfur content or maximum sulfur content of the oil. **[Reference: 40 CFR 60.48c(f) and COMAR 26.11.09.08E(2)]**

The Permittee shall demonstrate compliance by maintaining records of fuel supplier’s certification and making the records available to the Department upon request. **[Reference: 40 CFR 60.48c(e)]**

The Permittee shall demonstrate compliance by reporting fuel supplier certifications to the Department and EPA Region III every six months. The report shall be postmarked by the 30<sup>th</sup> day following the end of the reporting period. **[Reference: 40 CFR 48c(j)]**

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

Compliance Status:

The Permittee continues to comply with the requirements to obtain supplier certification information, maintain records of fuel supplier certifications, and make those records available to the Department upon request. The Department received the company's 2023 Compliance Certification Report on March 18, 2024 for the entire year - equivalent of two semi-annual reports spanning the period from January 1, 2023 to December 31, 2023). Fuel oil was not utilized in 2023.

**C. Control of Nitrogen Oxides**

**COMAR 26.11.09.08E – NO<sub>x</sub> RACT.**

The requirements for boiler EU-3 are the same as those for EU-1 above.

---

**Emissions Unit: EU-5**

**[MDE ARA Reg No. 027-0052-8-0052]**

One (1) 12 ton per hour natural gas-fired Niro compact spray dryer, equipped with three cyclones and two baghouses for product recovery, constructed in 1979.

Product in the exhaust stream is recovered by three cyclones and two baghouses before gas stream discharges through a common stack. Natural gas or propane is the only fuel combusted in the dryer. Per Maryland and Virginia Milk Producers' Title V application, the Niro Spray Dryer is not designed to burn oil.

The baghouses and cyclones are used to recover dry milk products and are considered "inherent process equipment" under the federal CAM rule, 40 CFR Part 64, rather than control devices. Therefore, CAM does not apply.

**Applicable Standards and Limits:**

**A. Visible Emissions Limitations**

**COMAR 26.11.06.02C(2) – Visible Emission Standards.**

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

**COMAR 26.11.06.02A(2) – General Exceptions.**



**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

“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 verify that no visible emissions are exhausting from the common stack. An observer shall perform a visual observation of the common stack for visible emissions for a 6-minute period once a month.

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

- (a) Inspect combustion control system and dryer operations;
- (b) Perform all necessary adjustments and/or repairs to the dryer within 48 hours, so that visible emissions are eliminated;
- (c) Document in writing the results of the inspections, adjustments and/or repairs to the dryer; and
- (d) After 48 hours, if the required adjustments and/or repairs have not eliminated the visible emissions, take additional remedial actions and continue to perform a Method 9 observation once daily for 18 minutes until corrective action has achieved compliance. **[Authority: COMAR 26.11.03.06C]**

The Permittee shall maintain a log of the results of visible emissions observations performed on site for 5 years and make the log available to the Department’s representative upon request. The Permittee shall report on a semi-annual basis those periods when visible emissions are observed as required by Permit Condition 4 of Section III, “Report of Excess Emissions and Deviations.” **[Authority: COMAR 26.11.03.06C].**

**Rationale for Periodic Monitoring:**

Baghouses that are properly maintained will not have visible emissions. The compliance demonstration for the control of particulate matter requires the Permittee to develop and maintain a preventive maintenance plan for the baghouses that describes the maintenance activities and time schedule for completing each activity. The Permittee is required to perform maintenance

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

activities within the time frames established in the plan. With this maintenance plan, visible emissions are not likely. A monthly visual observation should be sufficient to verify that the baghouses are not malfunctioning and allowing for visible emissions in the exhaust from the common stack.

In addition to the monthly observations, The Permittee shall report visible emissions in accordance with permit condition 4 of Section III, "Report of Excess Emissions and Deviations."

**Compliance Status:**

The Permittee continues to comply with these requirements by conducting the required visible emission observations, maintaining a record of the results of the visible emissions observations performed on site for at least 5 years, making the records available to the Department's representative upon request, and reporting on a semi-annual basis the results of the visible emissions observations. The Department received the company's 2023 Compliance Certification Report on March 18, 2024 for the entire year - equivalent of two semi-annual reports spanning the period from January 1, 2023 to December 31, 2023. No visible emissions observations were reported.

**B. Control of Particulate Matter**

**COMAR 26.11.06.03B(2)(a)** – Particulate Matter from Confined Sources.

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

**Compliance Demonstration:**

The Permittee shall develop and maintain a preventive maintenance plan for the baghouses that describes the maintenance activities and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frames established in the plan and shall maintain a log with records of the dates and description of the maintenance that was performed. **[Authority: COMAR 26.11.03.06C]**

The Permittee shall maintain a copy of the preventive maintenance plan for the two baghouses and a record of the dates of and description of maintenance activity performed. The Permittee shall maintain records of malfunctions of the baghouses and the corrective actions taken to bring into proper operation. The Permittee shall make the maintenance plan and records of maintenance activities available to the Department upon request. Records shall be maintained for 5 years. **[Authority: COMAR 26.11.03.06C]**

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

Rationale/Discussion:

The baghouses are designed to achieve an emissions rate of 0.01 gr/dscf. If the baghouses are maintained they will continue to achieve their designed efficiency which is significantly less than the standard of 0.03 gr/dscf.

Compliance Status:

The Permittee complies with this requirement as with other requirements, by maintaining good operating practices as recommended by the equipment vendor to minimize emissions. In addition, the Permittee conducts a written in-house training program that includes instruction on good operating and maintenance practices for all operators of the installation. The Department received the company's 2023 Compliance Certification Report on March 18, 2024 for the entire year - equivalent of two semi-annual reports spanning the period from January 1, 2023 to December 31, 2023. No violations were reported.

**C. Control of Nitrogen Oxide Emissions**

**COMAR 26.11.09.08J – Requirements for Industrial Furnaces and Other Miscellaneous Installations that Cause Emissions of NO<sub>x</sub>.**

"A person who owns or operates any installation other than fuel-burning equipment that causes NO<sub>x</sub> emissions shall:

- (1) Maintain good operating practices as recommended by the equipment vendor to minimize NO<sub>x</sub> emissions;
- (2) Prepare and implement a written in-house training program for all operators of these installations that include instruction on good operating and maintenance practices for the particular installation;
- (3) Maintain and make available to the Department, upon request, the written in-house operator training program;
- (4) Burn only gas in each installation, where gas is available, during the period May 1 through September 30 of each year; and
- (5) Maintain operator training attendance records for each operator at the site for at least 2 years and make these records available to the Department upon request."

**COMAR 26.11.09.08B(5) – Operator Training.**

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

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

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

**Compliance Demonstration:**

The Permittee shall demonstrate compliance with the requirement to minimize NO<sub>x</sub> emissions by maintaining good operating practices as recommended by the equipment vendor. **[Authority: COMAR 26.11.09.08J(1)]**

The Permittee shall prepare and implement a written in-house training program for all operators of the installation that includes instruction on good operating and maintenance practices. **[Authority: COMAR 26.11.09.08J(2)]**

NOTE: **COMAR 26.11.09.08B(5)** – Operator Training.

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

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

**Compliance Status:**

The Permittee complies with this requirement as with other requirements, by maintaining good operating practices as recommended by the equipment vendor to minimize NO<sub>x</sub> emissions. In addition, the Permittee conducts a written in-house training program that includes instruction on good operating and maintenance practices for the operators of the installation. The company conducted the most recent training on March 30, 2022 and also on March 31, 2022.

---

**COMPLIANCE SCHEDULE**

Maryland and Virginia Milk is currently in compliance with all applicable air quality regulations.

**TITLE IV – ACID RAIN**

Not Applicable.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

**TITLE VI – OZONE DEPLETING SUBSTANCES**

Maryland and Virginia Milk is not subject to Title VI requirements.

**SECTION 112(r) – ACCIDENTAL RELEASE**

Maryland and Virginia Milk is subject to the requirements of Section 112(r). A Risk Management Plan has been submitted.

**PERMIT SHIELD**

Maryland and Virginia Milk did not request a permit shield.

**INSIGNIFICANT ACTIVITIES**

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

- (1) No.   1   Fuel burning equipment using gaseous fuels or no. 1 or no. 2 fuel oil, and having a heat input less than 1,000,000 Btu (1.06 gigajoules) per hour;
- (2) No.        Fuel-burning equipment using solid fuel and having a heat input of less than 350,000 Btu (0.37 gigajoule) per hour;
- (3) No.        Stationary internal combustion engines with 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;
- (4)   ✓   Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (5)   ✓   Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

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

The three (3) parts washers 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.

- (7)        Commercial bakery ovens with a rated heat input capacity of less than 2,000,000 Btu per hour;
- (8)        Kilns used for firing ceramic ware, heated exclusively by natural gas, liquefied petroleum gas, electricity, or any combination of these;

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

- (9) ☐ Confection cookers where the products are edible and intended for human consumption;
- (10) ☐ Die casting machines;
- (11) ☐ Photographic process equipment used to reproduce an image upon sensitized material through the use of radiant energy;
- (12) ☐ Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;
- (13) ☐ Brazing, soldering, or welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals and not directly related to plant maintenance, upkeep and repair or maintenance shop activities;
- (14) ☐ Equipment for washing or drying products fabricated from metal or glass, provided that no VOC is used in the process and that no oil or solid fuel is burned;
- (15) ☐ Containers, reservoirs, or tanks used exclusively for electrolytic plating work, or electrolytic polishing, or electrolytic stripping of brass, bronze, cadmium, copper, iron, lead, nickel, tin, zinc, and precious metals;
- (16) Containers, reservoirs, or tanks used exclusively for:
- (a) ☐ Dipping operations for applying coatings of natural or synthetic resins that contain no VOC;
- (b) ☐ Dipping operations for coating objects with oils, waxes, or greases, and where no VOC is used;
- (c) ☒ Storage of butane, propane, or liquefied petroleum, or natural gas;
- (d) No. ☐ Storage of lubricating oils;
- (e) No. ☐ Unheated storage of VOC with an initial boiling point of 300 °F (149 °C) or greater;

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

- (f) No.   1   Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;
- (g) No.   1   Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;
- (h) No.  10  The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;
- (17)      Gaseous fuel-fired or electrically heated furnaces for heat treating glass or metals, the use of which does not involve molten materials;
- (18) Crucible furnaces, pot furnaces, or induction furnaces, with individual capacities of 1,000 pounds (454 kilograms) or less each, in which no sweating or distilling is conducted, or any fluxing is conducted using chloride, fluoride, or ammonium compounds, and from which only the following metals are poured or in which only the following metals are held in a molten state:
- (a)      Aluminum or any alloy containing over 50 percent aluminum, if no gaseous chloride compounds, chlorine, aluminum chloride, or aluminum fluoride is used;
- (b)      Magnesium or any alloy containing over 50 percent magnesium;
- (c)      Lead or any alloy containing over 50 percent lead;
- (d)      Tin or any alloy containing over 50 percent tin;
- (e)      Zinc or any alloy containing over 50 percent zinc;
- (f)      Copper;
- (g)      Precious metals;
- (19)      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;



**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

- (20) ☒ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;
- (21) ☐ Certain recreational equipment and activities, such as fireplaces, barbecue pits and cookers, fireworks displays, and kerosene fuel use;
- (22) ☒ Potable water treatment equipment, not including air stripping equipment;
- (23) ☐ Firing and testing of military weapons and explosives;
- (24) ☐ Emissions resulting from the use of explosives for blasting at quarrying operations and from the required disposal of boxes used to ship the explosive;
- (25) ☒ Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;
- (26) ☐ Grain, metal, or mineral extrusion presses;
- (27) ☐ Breweries with an annual beer production less than 60,000 barrels;
- (28) ☐ Natural draft hoods or natural draft ventilators that exhaust air pollutants into the ambient air from manufacturing/industrial or commercial processes;
- (29) ☒ Laboratory fume hoods and vents;
- (30) No. ☐ Sheet-fed letter or lithographic printing press(es) with a cylinder width of less than 18 inches;

The Permittee is subject to the following requirements for each printing press:

**COMAR 26.11.19.11E**, which requires that a person who uses material containing VOC to clean printing equipment:

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

- (a) Store all waste materials containing VOC, including cloth and paper, in closed containers;
- (b) Maintain lids on all VOC-containing cleanup materials when not in use;
- (c) Establish in writing for persons who clean printing equipment good operating practices designed to minimize the use of VOC-containing materials, and make the written descriptions of these good operating practices available to the Department upon request; and
- (d) Upon request by the Department, participate in the evaluation of non-VOC and low-VOC materials used to clean printing equipment when these materials have the potential to be appropriate substitutes for currently used materials.

(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 Biological wastewater treatment plant, used only as a backup to POTW

No. \_\_\_\_\_

No. 1 Ammonia refrigeration system fugitive emissions (COMAR 26.11.02.10X(3)(c))

No. \_\_\_\_\_

No. \_\_\_\_\_

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

No. \_\_\_\_\_

No. \_\_\_\_\_

No. \_\_\_\_\_

No. \_\_\_\_\_

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

No. \_\_\_\_\_

**STATE ONLY ENFORCEABLE REQUIREMENTS**

This section of the permit contain state-only enforceable requirements. The requirements in this section will not be enforced by the U.S. Environmental Protection Agency. The requirements in this section are not subject to **COMAR 26.11.03 10 - Public Petitions for Review to EPA Regarding Part 70 Permits.**

For all emissions units, the Permittee is subject to the following State-only enforceable requirements:

(a) **COMAR 26.11.06.08 – Nuisance.**

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

(b) **COMAR 26.11.06.09 – Odors.**

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

**Compliance Status.** Four odor complaints were received this permit renewal cycle.

An odor complaint was received in May 2020. It was found this was likely the result of a wastewater tank emptying “sludge” by pump. The facility stated in order to prevent possible future odor occurrences, the tank will be emptied every 3000 gallons instead of every 6000 gallons, which would equate to approximately three loads per day. Wastewater operation records were provided and showed no deviation from ordinary conditions. A record review showed all air quality permit requirements were met during the period of complaints. The facility also provided updated driver procedures for tank emptying.

An odor complaint was received in January 2023. A record review showed all air quality permit requirements were met during this period. An odor survey was conducted in response at the plant, as well as the complainant's residence and the

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
PERMIT NO. 24-027-0052  
PART 70 OPERATING PERMIT FACT SHEET**

surrounding area. No notable odors were detected. Howard County Department of Public Works also contacted the facility and performed a follow-up.

An odor complaint was received in March 2023. A record review showed all air quality permit requirements were met during this period. The issue was referred to Howard County Department of Public Works, who conducted an investigation.

An odor complaint was received in April 2023. A record review showed all air quality permit requirements were met during this period. It appears that odors detected by adjacent property owners may be the result of sludge transfer into trucks during evening hours when prevailing winds are from the west/northwest. An odor survey was conducted at the plant and the surrounding area after the Full Compliance Evaluation was performed. No notable odors were detected.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

<b>SECTION I</b>	<b>SOURCE IDENTIFICATION</b>	<b>4</b>
1.	DESCRIPTION OF FACILITY	4
2.	FACILITY INVENTORY LIST	4
<b>SECTION II</b>	<b>GENERAL CONDITIONS</b>	<b>5</b>
1.	DEFINITIONS	5
2.	ACRONYMS	5
3.	EFFECTIVE DATE	6
4.	PERMIT EXPIRATION	6
5.	PERMIT RENEWAL	6
6.	CONFIDENTIAL INFORMATION	7
7.	PERMIT ACTIONS	7
8.	PERMIT AVAILABILITY	8
9.	REOPENING THE PART 70 PERMIT FOR CAUSE BY THE EPA	8
10.	TRANSFER OF PERMIT	8
11.	REVISION OF PART 70 PERMITS – GENERAL CONDITIONS	8
12.	SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS	9
13.	MINOR PERMIT MODIFICATIONS	10
14.	ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS	13
15.	OFF-PERMIT CHANGES TO THIS SOURCE	15
16.	ON-PERMIT CHANGES TO SOURCES	16
17.	FEE PAYMENT	18
18.	REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS	18
19.	CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION	19
20.	PROPERTY RIGHTS	20
21.	SEVERABILITY	20
22.	INSPECTION AND ENTRY	20
23.	DUTY TO PROVIDE INFORMATION	21
24.	COMPLIANCE REQUIREMENTS	21
25.	CREDIBLE EVIDENCE	22
26.	NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE	22
27.	CIRCUMVENTION	22
28.	PERMIT SHIELD	22
29.	ALTERNATE OPERATING SCENARIOS	23
<b>SECTION III</b>	<b>PLANT WIDE CONDITIONS</b>	<b>24</b>
1.	PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION	24
2.	OPEN BURNING	24
3.	AIR POLLUTION EPISODE	24
4.	REPORT OF EXCESS EMISSIONS AND DEVIATIONS	24
5.	ACCIDENTAL RELEASE PROVISIONS	25
6.	GENERAL TESTING REQUIREMENTS	26
7.	EMISSIONS TEST METHODS	26
8.	EMISSIONS CERTIFICATION REPORT	27
9.	COMPLIANCE CERTIFICATION REPORT	28
10.	CERTIFICATION BY RESPONSIBLE OFFICIAL	28
11.	SAMPLING AND EMISSIONS TESTING RECORD KEEPING	29

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

12.	GENERAL RECORDKEEPING.....	30
13.	GENERAL CONFORMITY.....	30
14.	ASBESTOS PROVISIONS .....	30
15.	OZONE DEPLETING REGULATIONS.....	30
16.	ACID RAIN PERMIT .....	31
<b>SECTION IV</b>	<b>PLANT SPECIFIC CONDITIONS.....</b>	<b>32</b>
<b>SECTION V</b>	<b>INSIGNIFICANT ACTIVITIES .....</b>	<b>45</b>
<b>SECTION VI</b>	<b>STATE-ONLY ENFORCEABLE CONDITIONS .....</b>	<b>51</b>

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**SECTION I SOURCE IDENTIFICATION**

**1. DESCRIPTION OF FACILITY**

The Maryland and Virginia Milk Producers Association Incorporated, henceforth referred to as Maryland and Virginia Milk or MDVA Milk, is located at 8321 Leishear Road in Laurel, Howard County, Maryland. It lies within Maryland's air pollution area III. The facility, which is owned by a cooperative of 1600 member farmers from a ten state region stretching from the Mid Atlantic area into the South, processes milk into condensed skim milk products, and nonfat dry milk powder and butter from surplus milk produced by the farmers. The facility currently receives, on average, 40 trailer loads of milk per day each carrying about 5,550 gallons.

Installations at the facility are comprised of one 12 tons per hour natural gas fired Niro spray dryer used for drying milk, and two process boilers – one natural gas fired Keeler boiler rated at 49 MMBtu/hour heat input, and one natural gas and No. 2 fuel-oil fired Cleaver Brooks boiler rated at 29 MMBtu/hour. The Keeler boiler was installed in 1979 and the Cleaver Brooks boiler was installed in 2004. The Cleaver Brooks boiler is subject to the New Source Performance Standard (NSPS) Subpart Dc because it was installed after the applicability date of June 9, 1989.

**2. FACILITY INVENTORY LIST**

Maryland and Virginia Milk has identified the following emissions units as subject to the Title V operating permit program.

<b>Emissions Unit Number*</b>	<b>MDE - ARA Registration Number</b>	<b>Emissions Unit Name and Description</b>	<b>Date of Installation</b>
EU-1	027-0052-5-0065	One (1) 49 MMBtu/hr natural gas-fired Keeler boiler.	1979
EU-3	027-0052-5-0209	One (1) 29 MMBtu/hr Cleaver Brooks boiler, permitted to burn natural gas and No. 2 fuel oil.	2004
EU-5	027-0052-8-0052	One (1) 12 ton per hour natural gas-fired Niro compact spray dryer, equipped with three cyclones and two baghouses for product recovery.	1995

\*Gaps in EU (Emissions Unit) designation indicate units that have been decommissioned and removed from the facility.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**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 <sub>x</sub>	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 <sub>2</sub>	Sulfur Dioxide



**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

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.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**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

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- d. Additional requirements become applicable to an affected source under the Federal Acid Rain Program.

**8. PERMIT AVAILABILITY**

**[COMAR 26.11.02.13G]**

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

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

**[COMAR 26.11.03.20B]**

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

**10. TRANSFER OF PERMIT**

**[COMAR 26.11.02.02E]**

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

**11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS**

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

- a. The Permittee shall submit an application to the Department to revise this Part 70 permit when required under COMAR 26.11.03.15 -.17.
- b. When applying for a revision to a Part 70 permit, the Permittee shall comply with the requirements of COMAR 26.11.03.02 and .03 except that the application for a revision need include only information listed that is related to the proposed change to the source and revision to the permit. This information shall be sufficient to evaluate the proposed change and to determine whether it will comply with all applicable requirements of the Clean Air Act.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- c. The Permittee may not change any provision of a compliance plan or schedule in a Part 70 permit as an administrative permit amendment or as a minor permit modification unless the change has been approved by the Department in writing.
- d. A permit revision is not required for a change that is provided for in this permit relating to approved economic incentives, marketable permits, emissions trading, and other similar programs.

**12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS**

**[COMAR 26.11.03.17]**

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

- a. A significant modification is a revision to the federally enforceable provisions in the permit that does not qualify as an administrative permit amendment under COMAR 26.11.03.15 or a minor permit modification as defined under COMAR 26.11.03.16.
- b. This permit does not preclude the Permittee from making changes, consistent with the provisions of COMAR 26.11.03, that would make the permit or particular terms and conditions of the permit irrelevant, such as by shutting down or reducing the level of operation of a source or of an emissions unit within the source. Air pollution control equipment shall not be shut down or its level of operation reduced if doing so would violate any term of this permit.
- c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal, including the requirements for applications, public participation, and review by affected states and EPA, except:
  - (1) An application need include only information pertaining to the proposed change to the source and modification of this permit, including a description of the change and modification, and any new applicable requirements of the Clean Air Act that will apply if the change occurs;

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- (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,

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- (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:

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- (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.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- 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;



**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- (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.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**15. OFF-PERMIT CHANGES TO THIS SOURCE**

**[COMAR 26.11.03.19]**

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

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

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- e. Changes that qualify under COMAR 26.11.03.19 are not subject to the requirements for Part 70 revisions.
- f. The Permittee shall include each off-permit change under COMAR 26.11.03.19 in the application for renewal of the part 70 permit.
- g. The permit shield in COMAR 26.11.03.23 does not apply to off-permit changes made under COMAR 26.11.03.19.
- h. The Permittee is subject to enforcement action if it is determined that an off-permit change made under COMAR 26.11.03.19 is not within the scope of this regulation.

**16. ON-PERMIT CHANGES TO SOURCES**

**[COMAR 26.11.03.18]**

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

- a. The Permittee may make a change to this facility without obtaining a revision to this Part 70 permit if:
  - (1) The change is not a Title I modification;
  - (2) The change does not result in emissions in excess of those expressly allowed under the federally enforceable provisions of the Part 70 permit for the permitted facility or for an emissions unit within the facility, whether expressed as a rate of emissions or in terms of total emissions;
  - (3) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;
  - (4) The change does not violate an applicable requirement of the Clean Air Act;
  - (5) The change does not violate a federally enforceable permit term or condition related to monitoring, including test methods, record keeping, reporting, or compliance certification requirements;

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- (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.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- 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;

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

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

**19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION**

**[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]**

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

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

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

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**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.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**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 disclosable 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.



**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

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;

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- 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.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**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;

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

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

**5. ACCIDENTAL RELEASE PROVISIONS**

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

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

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

or

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**[2].** Should the Permittee become subject to 40 CFR 68 during the term of this permit, the Permittee shall submit risk management plans by the date specified in 40 CFR 68.150 and shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.

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

**6. GENERAL TESTING REQUIREMENTS**

**[COMAR 26.11.01.04]**

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

**7. EMISSIONS TEST METHODS**

**[COMAR 26.11.01.04]**

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

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

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

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**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,

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- (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

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

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.



**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**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:

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

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

**16. ACID RAIN PERMIT**

Not applicable

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**SECTION IV PLANT SPECIFIC CONDITIONS**

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

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

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

Table IV – 1	
1.0	<b><u>Emissions Unit Number(s): EU-1</u></b>  <b>[MDE ARA Reg. No. 027-0052-5-0065]</b>  One (1) 49 MMBtu/hr natural gas-fired Keeler boiler.
1.1	<b><u>Applicable Standards/Limits:</u></b>  <b><u>A. Visible Emissions Limitations</u></b> <b>COMAR 26.11.09.05A(2) – Fuel Burning Equipment.</b> “In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.”  <b>COMAR 26.11.09.05A(3) – Exceptions.</b> “Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if: (a) The visible emissions are not greater than 40 percent opacity; and

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

<b>Table IV – 1</b>	
	<p>(b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period.”</p> <p><b>B. <u>Control of Nitrogen Oxides</u></b>  <b><u>COMAR 26.11.09.08E – Requirements for Fuel-Burning Equipment with a Rated Heat Input Capacity of 100 Million Btu Per Hour or Less.</u></b></p> <p>See NOx RACT in Table IV-2.1</p>
<b>1.2</b>	<p><b><u>Testing Requirements:</u></b></p> <p><b>A. <u>Visible Emissions Limitations</u></b>  See Monitoring Requirements in Section 1.3.A.</p> <p><b>B. <u>Control of Nitrogen Oxides</u></b>  See Monitoring Requirements in Section 1.3.B.</p>
<b>1.3</b>	<p><b><u>Monitoring Requirements:</u></b></p> <p><b>A. <u>Visible Emissions Limitations</u></b>  The Permittee shall:</p> <p>(1) Properly operate and maintain the boiler; and</p> <p>(2) Maintain an operations training manual and preventive maintenance plan.</p> <p><b>B. <u>Control of Nitrogen Oxides</u></b>  See NOx RACT in Table IV-2.1  <b>[Authority: COMAR 26.11.03.06]</b></p>
<b>1.4</b>	<p><b><u>Record Keeping Requirements:</u></b></p> <p><b>NOTE:</b> All records must be maintained for a period of 5 years.  <b>[Authority: COMAR 26.11.03.06.C(5)(g)]</b></p> <p><b>A. <u>Visible Emissions Limitations</u></b>  The Permittee shall maintain a log of maintenance performed on the boilers and operations training provided to the boiler operators.</p> <p><b>B. <u>Control of Nitrogen Oxides</u></b>  See NOx RACT in Table IV-2.1  <b>[Authority: COMAR 26.11.03.06]</b></p>

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

Table IV – 1	
<b>1.5</b>	<p><b><u>Reporting Requirements:</u></b></p> <p><b>A. <u>Visible Emissions Limitations</u></b> The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4 of Section III, “Report of Excess Emissions and Deviation”.</p> <p><b>B. <u>Control of Nitrogen Oxides</u></b> See NOx RACT in Table IV-2.1 <b>[Authority: COMAR 26.11.03.06]</b></p>

Table IV – 2	
<b>2.0</b>	<p><b><u>Emissions Unit Number(s): EU-3</u></b></p> <p><b>[MDE ARA Reg. No. 027-0052-5-0209]</b></p> <p>One (1) 29 MMBtu/hr Cleaver Brooks boiler, configured to burn natural gas and No. 2 fuel oil.</p>
<b>2.1</b>	<p><b><u>Applicable Standards/Limits:</u></b></p> <p><b>A. <u>Visible Emissions Limitations</u></b> <b>COMAR 26.11.09.05A(2) – <u>Fuel Burning Equipment</u>.</b> “In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.”</p> <p><b>COMAR 26.11.09.05A(3) – <u>Exceptions</u>.</b> “Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period.”</p> <p><b>B. <u>Control of Sulfur Oxides</u></b></p>

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**Table IV – 2**

**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.”

**40 CFR §60.42c – Standard for sulfur dioxide (SO<sub>2</sub>).**

**§60.42c(d)** “On and after the date on which the initial performance test is completed or required to be completed under § 60.8, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO<sub>2</sub> in excess of 215 ng/J (0.50 lb/MMBtu) heat input from oil; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. The percent reduction requirements are not applicable to affected facilities under this paragraph.”

**§60.42c(h)** “For affected facilities listed under paragraphs (h)(1), (2), (3), or (4) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under § 60.48c(f), as applicable.

(1) Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr).

(2) Residual oil-fired affected facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr).

(3) ...

(4) ...”

Note: The monitoring, record keeping, and reporting requirements under NSPS Subpart Dc will be used to demonstrate compliance with **COMAR 26.11.09.07A(2)(b)**.

**C. Control of Nitrogen Oxides**

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

See NOx RACT in Table IV-2.1

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

Table IV – 2	
<b>2.2</b>	<p><b><u>Testing Requirements:</u></b></p> <p><b>A. <u>Visible Emissions Limitations</u></b> See Monitoring Requirements in Section 2.3.A.</p> <p><b>B. <u>Control of Sulfur Oxides</u></b> See Monitoring Requirements in Section 2.3.B.</p> <p><b>C. <u>Control of Nitrogen Oxides</u></b> See Monitoring Requirements in Section 2.3.C.</p>
<b>2.3</b>	<p><b><u>Monitoring Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b> The Permittee shall:</p> <ul style="list-style-type: none"> <li>(1) Properly operate and maintain the boilers in a manner to prevent visible emissions;</li> <li>(2) Maintain an operations manual and preventive maintenance plan; and</li> <li>(3) 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.</li> </ul> <p>The Permittee shall perform the following, if emissions are visible:</p> <ul style="list-style-type: none"> <li>(1) Inspect combustion system and boiler operations;</li> <li>(2) Perform all necessary adjustments and/or repairs to the boiler within 48 hours, so that visible emissions are eliminated;</li> <li>(3) Document in writing the results of inspections, adjustments and/or repairs to the boiler; and</li> <li>(4) 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. <b>[COMAR 26.11.03.06C]</b></li> </ul>

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

<b>Table IV – 2</b>	
	<p><b><u>B. Control of Sulfur Oxides</u></b> The Permittee shall obtain fuel suppliers' certification, which shall include the following information:</p> <p>(1) For distillate oil:</p> <p>(a) The name of the oil supplier;</p> <p>(b) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in § 60.41c; and</p> <p>(c) The sulfur content or maximum sulfur content of the oil. <b>[Reference: 40 CFR 60.48c(f) and COMAR 26.11.09.08E(2)]</b></p> <p><b><u>C. Control of Nitrogen Oxides</u></b> See NOx RACT in Table IV-2.1</p>
<b>2.4</b>	<p><b><u>Record Keeping Requirements:</u></b></p> <p><b>NOTE:</b> All records must be maintained for a period of 5 years. <b>[Authority: COMAR 26.11.03.06.C(5)(g)]</b></p> <p><b><u>A. Control of Visible Emissions</u></b> The Permittee shall:</p> <p>(1) Maintain a log of maintenance performed on the boiler and operations training provided to the boiler operators; and</p> <p>(2) Maintain a log of visible emissions observations performed on site for 5 years and make the log available to the Department's representative upon request. <b>[Authority: COMAR 26.11.03.06C]</b></p> <p><b><u>B. Control of Sulfur Oxides</u></b> The Permittee shall maintain records of fuel supplier's certification and shall make records available to the Department upon request. <b>[Authority: 40 CFR 60.48c(e)]</b></p> <p><b><u>C. Control of Nitrogen Oxides</u></b> See NOx RACT in Table IV-2.1</p>



**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

Table IV – 2	
<b>2.5</b>	<p><b><u>Reporting Requirements:</u></b></p> <p><b>A. <u>Control of Visible Emissions</u></b> The Permittee shall report incidents of visible emissions in accordance with Section III – Plant Wide Conditions, Item 4 “Report of Excess Emissions and Deviations.” <b>[Authority: COMAR 26.11.03.06C]</b></p> <p><b>B. <u>Control of Sulfur Oxides</u></b> The Permittee shall report fuel supplier certifications to the Department and EPA Region III every six months. The report shall be postmarked by the 30th day following the end of the reporting period. <b>[Authority: 40 CFR 48c(j)]</b></p> <p><b>C. <u>Control of Nitrogen Oxides</u></b> See NOx RACT in Table IV-2.1</p>

Table IV – 2.1 - NOx RACT REQUIREMENTS	
<b>2.1.0</b>	<p><b><u>Emissions Unit Number(s):</u></b></p> <p><b>EU-1</b></p> <p><b>[MDE ARA Reg. No. 027-0052-5-0065]</b></p> <p>One (1) 49 MMBtu/hr natural gas-fired Keeler boiler.</p> <p><b>EU-3</b></p> <p><b>[ARA Reg. No. 027-0052-5-0209]</b></p> <p>One (1) 29 MMBtu/hr Cleaver Brooks boiler, configured to burn natural gas and No. 2 fuel oil.</p>
<b>2.1.1</b>	<p><b><u>Applicable Standards/Limits:</u></b></p> <p><b>COMAR 26.11.09.08B(5) – <u>Operator Training.</u></b></p>

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

<b>Table IV – 2.1 - NO<sub>x</sub> RACT REQUIREMENTS</b>	
	<p>“(a) For the purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.</p> <p>(b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department.”</p> <p><b>COMAR 26.11.09.08E – <u>Requirements for Equipment with a rated heat input capacity of 100 Million Btu per hour or Less.</u></b></p> <p>“A person who owns or operates fuel-burning equipment with a rated heat input capacity of 100 Million Btu per hour or less shall:</p> <ol style="list-style-type: none"> <li>(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;</li> <li>(2) Perform a combustion analysis for each installation at least once each year and optimize combustion based on the analysis;</li> <li>(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;</li> <li>(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</li> <li>(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.”</li> </ol>
<b>2.1.2</b>	<p><b><u>Testing Requirements:</u></b></p> <p>The Permittee shall perform a combustion analysis on each installation at least once each year. <b>[Authority: COMAR 26.11.09.08E(2)]</b></p>
<b>2.13</b>	<p><b><u>Monitoring Requirements:</u></b></p>

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

<b>Table IV – 2.1 - NO<sub>x</sub> RACT REQUIREMENTS</b>	
	The Permittee shall optimize combustion based on the analysis <b>[Authority: COMAR 26.11.09.08E(2)]</b>
<b>2.14</b>	<p><b><u>Record Keeping Requirements:</u></b></p> <p><b>NOTE:</b> All records must be maintained for a period of 5 years. <b>[Authority: COMAR 26.11.03.06.C(5)(g)].</b></p> <p>The Permittee shall:</p> <ul style="list-style-type: none"> <li>(1) Maintain the results of the combustion analysis at the site; and</li> <li>(2) Prepare and maintain a record of training program attendance for each operator at the site.</li> </ul> <p><b>[Authority: COMAR 26.11.09.08E(3) and (5)]</b></p>
<b>2.15</b>	<p><b><u>Reporting Requirements:</u></b></p> <p>The Permittee shall submit:</p> <ul style="list-style-type: none"> <li>(1) The results of combustion analysis to the department and the EPA upon request <b>[Reference: COMAR 26.11.09.08E(3)]</b>; and</li> <li>(2) A record of training program attendance for each operator to the Department upon request. <b>[Reference: COMAR 26.11.09.08E(5)]</b></li> </ul>

<b>Table IV – 3</b>	
<b>3.0</b>	<p><b><u>Emissions Unit Number(s): EU-5</u></b></p> <p><b>[ARA Reg. No. 027-0052-8-0052]</b></p> <p>One (1) 12 ton per hour natural gas-fired Niro compact spray dryer, equipped with three cyclones and two baghouses for product recovery.</p>
<b>3.1</b>	<p><b><u>Applicable Standards/Limits:</u></b></p> <p><b><u>A. Visible Emissions Limitations</u></b></p>

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

<b>Table IV – 3</b>	
	<p><b>COMAR 26.11.06.02C(2)</b> – Visible Emission Standards. “In Areas III and IV a person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers.”</p> <p><b>COMAR 26.11.06.02A(2)</b> – 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:</p> <ul style="list-style-type: none"> <li>(a) The visible emissions are not greater than 40 percent opacity; and</li> <li>(b) The visible emissions do not occur for more than 6 consecutive minutes in any 60-minute period.”</li> </ul> <p><b><u>B. Control of Particulate Matter</u></b> <b>COMAR 26.11.06.03B(2)(a)</b> – Particulate Matter from Confined Sources. “A person may not cause or permit to be discharged into the outdoor atmosphere from any other installation, particulate matter in excess of 0.03 gr/SCFD (68.7 mg/dscm).”</p> <p><b><u>C. Control of Nitrogen Oxides</u></b> <b>COMAR 26.11.09.08J</b> – Requirements for Industrial Furnaces and Other Miscellaneous Installations that Cause Emissions of NO<sub>x</sub>. “A person who owns or operates any installation other than fuel-burning equipment that causes NO<sub>x</sub> emissions shall:</p> <ul style="list-style-type: none"> <li>(1) Maintain good operating practices as recommended by the equipment vendor to minimize NO<sub>x</sub> emissions;</li> <li>(2) Prepare and implement a written in-house training program for all operators of these installations that include instruction on good operating and maintenance practices for the particular installation;</li> <li>(3) Maintain and make available to the Department, upon request, the written in-house operator training program;</li> <li>(4) Burn only gas in each installation, where gas is available, during the period May 1 through September 30 of each year; and</li> </ul>

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

<b>Table IV – 3</b>	
	<p>(5) Maintain operator training attendance records for each operator at the site for at least 2 years and make these records available to the Department upon request.”</p> <p><b>COMAR 26.11.09.08B(5) – <u>Operator Training</u>.</b>  “(a) For the purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.</p> <p>(b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department.”</p>
<b>3.2</b>	<p><b><u>Testing Requirements:</u></b></p> <p><b>A. <u>Visible Emissions Limitations</u></b> See Monitoring Requirements in Section 3.3.A.</p> <p><b>B. <u>Control of Particulate Matter</u></b> See Monitoring Requirements in Section 3.3.B.</p> <p><b>C. <u>Control of Nitrogen Oxides</u></b> See Monitoring Requirements in Section 3.3.C.</p>
<b>3.3</b>	<p><b><u>Monitoring Requirements:</u></b></p> <p><b>A. <u>Visible Emissions Limitations</u></b> The Permittee shall verify that no visible emissions are exhausting from the common stack. An observer shall perform a visual observation of the common stack to look for visible emissions for a 6 minute period once a month.</p> <p>The Permittee shall perform the following, if emissions are visible to human observer:</p> <p>(a) Inspect combustion control system and dryer operations;</p> <p>(b) Perform all necessary adjustments and/or repairs to the dryer within 48 hours, so that visible emissions are eliminated;</p> <p>(c) Document in writing the results of the inspections, adjustments and/or repairs to the dryer; and</p>

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

<b>Table IV – 3</b>	
	<p>(d) After 48 hours, if the required adjustments and/or repairs have not eliminated the visible emissions, take additional remedial actions and continue to perform a Method 9 observation once daily for 18 minutes until corrective action has achieved compliance. <b>[Authority: COMAR 26.11.03.06C]</b></p> <p><b><u>B. Control of Particulate Matter</u></b> The Permittee shall develop and maintain a preventive maintenance plan for the baghouses that describes the maintenance activities and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frames established in the plan and shall maintain a log with records of the dates and description of the maintenance that was performed. <b>[Authority: COMAR 26.11.03.06C]</b></p> <p><b><u>C. Control of Nitrogen Oxides</u></b> The Permittee shall maintain good operating practices as recommended by the equipment vendor to minimize NO<sub>x</sub> emissions. <b>[Authority: COMAR 26.11.09.08J(1)]</b></p> <p>The Permittee shall prepare and implement a written in-house training program for all operators that includes instruction on good operating and maintenance practices. <b>[Authority: COMAR 26.11.09.08J(2)]</b></p> <p><b>NOTE: COMAR 26.11.09.08B(5) – <u>Operator Training</u>.</b> “(a) For the purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.</p> <p>(b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department.”</p>
<b>3.4</b>	<p><b><u>Record Keeping Requirements:</u></b></p> <p>NOTE: All records must be maintained for a period of 5 years. <b>[Authority: COMAR 26.11.03.06.C(5)(g)]</b></p> <p><b><u>A. Visible Emissions Limitations</u></b></p>

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

<b>Table IV – 3</b>	
	<p>The Permittee shall maintain log of results of the visible emissions observations performed on site for 5 years and make the log available to the Department's representative upon request. <b>[Authority: COMAR 26.11.03.06C]</b></p> <p><b><u>B. Control of Particulate Matter</u></b> The Permittee shall maintain a copy of the preventive maintenance plan for the two baghouses and a record of the dates of and description of maintenance activity performed. The Permittee shall maintain records of malfunctions of the baghouses and the corrective actions taken to bring into proper operation. The Permittee shall make the maintenance plan and records of maintenance activities available to the Department upon request. Records shall be maintained for 5 years. <b>[Authority: COMAR 26.11.03.06C]</b></p> <p><b><u>C. Control of Nitrogen Oxides</u></b> The Permittee shall maintain the written in-house operator training program and operator training attendance records for each operator at the site for 5 years. The Permittee shall make available to the Department, upon request, the written in-house operator training program and records of operator training attendance. <b>[Reference: COMAR 26.11.09.08J(2)] [Note: For consistency with other recordkeeping requirements, records of the in-house operator training program and attendance shall be maintained for 5 years.]</b></p>
<b>3.5</b>	<p><b><u>Reporting Requirements:</u></b></p> <p><b><u>A. Visible Emissions Limitations</u></b> The Permittee shall Report incidents of visible emissions in accordance with Condition 4 of Section III, "Report of Excess Emissions and Deviation."</p> <p><b><u>B. Control of Particulate Matter</u></b> See Record Keeping requirements 3.4.B.</p> <p><b><u>C. Control of Nitrogen Oxides</u></b> See Record Keeping requirements 3.4.C.</p>

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**SECTION V      INSIGNIFICANT ACTIVITIES**

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

- (1) No.   1        Fuel burning equipment using gaseous fuels or no. 1 or no. 2 fuel oil, and having a heat input less than 1,000,000 Btu (1.06 gigajoules) per hour;
- (2) No.             Fuel-burning equipment using solid fuel and having a heat input of less than 350,000 Btu (0.37 gigajoule) per hour;
- (3) No.             Stationary internal combustion engines with 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;
- (4)   ✓                Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (5)   ✓                Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;
- (6) No.   3        Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

The three (3) parts washers 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



**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

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.
- 
- (7)     \_\_\_     Commercial bakery ovens with a rated heat input capacity of less than 2,000,000 Btu per hour;
  - (8)     \_\_\_     Kilns used for firing ceramic ware, heated exclusively by natural gas, liquefied petroleum gas, electricity, or any combination of these;
  - (9)     \_\_\_     Confection cookers where the products are edible and intended for human consumption;
  - (10)    \_\_\_     Die casting machines;
  - (11)    \_\_\_     Photographic process equipment used to reproduce an image upon sensitized material through the use of radiant energy;
  - (12)    \_\_\_     Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;
  - (13)    \_\_\_     Brazing, soldering, or welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals and not directly related to plant maintenance, upkeep and repair or maintenance shop activities;

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- (14) ☐ Equipment for washing or drying products fabricated from metal or glass, provided that no VOC is used in the process and that no oil or solid fuel is burned;
- (15) ☐ Containers, reservoirs, or tanks used exclusively for electrolytic plating work, or electrolytic polishing, or electrolytic stripping of brass, bronze, cadmium, copper, iron, lead, nickel, tin, zinc, and precious metals;
- (16) Containers, reservoirs, or tanks used exclusively for:
- (a) ☐ Dipping operations for applying coatings of natural or synthetic resins that contain no VOC;
- (b) ☐ Dipping operations for coating objects with oils, waxes, or greases, and where no VOC is used;
- (c) ☒ Storage of butane, propane, or liquefied petroleum, or natural gas;
- (d) No. ☐ Storage of lubricating oils;
- (e) No. ☐ Unheated storage of VOC with an initial boiling point of 300 °F (149 °C) or greater;
- (f) No. 1 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;
- (g) No. 1 Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;
- (h) No. 10 The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;
- (17) ☐ Gaseous fuel-fired or electrically heated furnaces for heat treating glass or metals, the use of which does not involve molten materials;
- (18) Crucible furnaces, pot furnaces, or induction furnaces, with individual capacities of 1,000 pounds (454 kilograms) or less each, in which no sweating or distilling is conducted, or any fluxing is conducted using

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

chloride, fluoride, or ammonium compounds, and from which only the following metals are poured or in which only the following metals are held in a molten state:

- (a) ☐ Aluminum or any alloy containing over 50 percent aluminum, if no gaseous chloride compounds, chlorine, aluminum chloride, or aluminum fluoride is used;
- (b) ☐ Magnesium or any alloy containing over 50 percent magnesium;
- (c) ☐ Lead or any alloy containing over 50 percent lead;
- (d) ☐ Tin or any alloy containing over 50 percent tin;
- (e) ☐ Zinc or any alloy containing over 50 percent zinc;
- (f) ☐ Copper;
- (g) ☐ Precious metals;
- (19) ☐ Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a total cooking area of 5 square feet (0.46 square meter) or less;
- (20) ☒ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;
- (21) ☐ Certain recreational equipment and activities, such as fireplaces, barbecue pits and cookers, fireworks displays, and kerosene fuel use;
- (22) ☒ Potable water treatment equipment, not including air stripping equipment;
- (23) ☐ Firing and testing of military weapons and explosives;
- (24) ☐ Emissions resulting from the use of explosives for blasting at quarrying operations and from the required disposal of boxes used to ship the explosive;

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- (25) ☒ Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;
- (26) ☐ Grain, metal, or mineral extrusion presses;
- (27) ☐ Breweries with an annual beer production less than 60,000 barrels;
- (28) ☐ Natural draft hoods or natural draft ventilators that exhaust air pollutants into the ambient air from manufacturing/industrial or commercial processes;
- (29) ☒ Laboratory fume hoods and vents;
- (30) No. ☐ Sheet-fed letter or lithographic printing press(es) with a cylinder width of less than 18 inches;

The Permittee is subject to the following requirements for each printing press:

COMAR 26.11.19.11E, which requires that a person who uses material containing VOC to clean printing equipment:

- (a) Store all waste materials containing VOC, including cloth and paper, in closed containers;
- (b) Maintain lids on all VOC-containing cleanup materials when not in use;
- (c) Establish in writing for persons who clean printing equipment good operating practices designed to minimize the use of VOC-containing materials, and make the written descriptions of these good operating practices available to the Department upon request; and
- (d) Upon request by the Department, participate in the evaluation of non-VOC and low-VOC materials used to clean printing equipment when these materials have the potential to be appropriate substitutes for currently used materials.

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

- (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 Biological wastewater treatment plant, used only as a backup to POTW

No. 1 Ammonia refrigeration system fugitive emissions (COMAR 26.11.02.10x(3)(c))

No. \_\_\_\_\_

No. \_\_\_\_\_

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

No. \_\_\_\_\_

No. \_\_\_\_\_

No. \_\_\_\_\_

No. \_\_\_\_\_

No. \_\_\_\_\_

**MARYLAND AND VIRGINIA MILK PRODUCERS  
COOPERATIVE ASSOCIATION, INC.  
8321 LEISHEAR ROAD, LAUREL, MD 20723  
DRAFT PART 70 OPERATING PERMIT NO. 24-027-0052**

**SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS**

For all emissions units, the Permittee is subject to the following State-only enforceable requirements:

(a) COMAR 26.11.06.08 – Nuisance.

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

(b) COMAR 26.11.06.09 – Odors.

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



---

**Maryland & Virginia**  
Milk Producers Cooperative Association, Inc.

January 26, 2024

Maryland Department of the Environment  
Combustion Section  
1800 Washington Blvd.  
Baltimore, MD 21230

RE: Title V Permit Renewal Application for Permit # 24-027-00052

Dear Sir/Madam:

Please find enclosed the Maryland & Virginia Milk Producers Cooperative Association, Inc. permit renewal package for manufacturing facility located in Laurel, Maryland, with current Title V Permit Number 24-027-00052. The requested three (3) copies are enclosed.

If you have questions about this application, please feel free to contact me at 301-953-2964 ext. 1211.

Sincerely,

John Rees  
Director of Operations

# **PART 70 PERMIT APPLICATION FOR RENEWAL**

**PERMIT NO. 24-027-00052**

*Prepared For:*

**Maryland & Virginia Milk Producers Cooperative Association**  
8321 Leishear Road  
Laurel, MD 20723

January 26, 2024

*Prepared by:*

**Compliance Partners, Inc.**  
402 E. Avenue G  
Midlothian, Texas 76065  
972-723-9509



## TABLE OF CONTENTS

---

	APPLICATION CHECKLIST	
	INSIGNIFICANT ACTIVITIES CHECKLIST	
	PART 70 PERMIT APPLICATION FOR RENEWAL	
SECTION 1	CERTIFICATOIN STATEMENTS	3
SECTION 2	FACILITY DESCRIPTION SUMMARY	5
SECTION 3A	EMISSIONS UNIT DESCRIPTIONS	6
SECTION 3B	CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS	9
SECTION 3C	OBSOLETE, EXTRANEIOUS, OR INSIGNIFICANT PERMIT CONDITIONS	19
SECTION 3D	ALTERNATE OPERATING SCENARIOS	20
SECTION 3E	CITATION TO AND DESCRIPTION OF APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS FOR AN ALTERNATE OPERATING SCENARIO	21
SECTION 4	CONTROL EQUIPMENT	22
SECTION 5	SUMMARY SHEET OF POTENTIAL EMISSIONS	23
SECTION 6	EXPLANATION OF PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE FEDERAL ENFORCEABLE REQUIREMENTS	24
SECTION 7	COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS	25
	STATE-ONLY ENFORCEABLE REQUIREMENTS	27
ATTACHMENT		
Attachment 1	Process Flow Diagram	
Attachment 2	Plot Plan	
Attachment 3	Emissions Certification Report (2023)	

**MARYLAND DEPARTMENT OF THE ENVIRONMENT  
AIR AND RADIATION ADMINISTRATION  
RENEWAL TITLE V APPLICATION CHECKLIST**

**VI .Application Completeness Checklist**

The purpose of this part is to list the information required to achieve a Part 70 application shield.

**Cover Page**

- (x) Name and address of owner or operator, including telephone number.
- (x) Name and address of facility, including the plant manager's name and telephone number.
- (x) A 24-hour emergency telephone number for air pollution matters.

**Section 1 CERTIFICATION STATEMENTS**

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

**Section 2 FACILITY DESCRIPTION SUMMARY**

- (x) A briefdescription of each of the source's process(es), including all applicable SIC codes and end products.
- (x) Flow diagrams indicating all emissions units, emission points, and control devices. See Attachment 1
- (x) A plot plan of the entire facility. See Attachment 2
- (x) Emission Certification Report. See Attachment 3
- (x) General Emissions Information.

**Section 3 EMISSIONS UNIT DESCRIPTIONS –**

This section must be completed for each emissions unit.

**Part A**

- (x) Emissions unit number.
- (x) Detailed description of unit, including all emission points.
- (x) Federally enforceable limit(s) on the operating schedule.

**MARYLAND DEPARTMENT OF THE ENVIRONMENT  
AIR AND RADIATION ADMINISTRATION  
RENEWAL TITLE V APPLICATION CHECKLIST**

- (x) Fuel consumption information for any emissions unit that consumes fuel including the type of fuel, percent sulfur, and annual usage of fuel.

**Part B**

- (x) A citation and description of each federally enforceable requirement, including all emission standards, for each emissions unit.
- (x) A statement of compliance demonstration techniques for each requirement, including a description of monitoring, record keeping, reporting requirements, and test methods.
- (x) The frequency of submittal the compliance demonstration during the permit term.

**Part C**

- (x) Emissions unit number.
- (x) Permit to construct number.
- (x) Emissions point number(s).
- (x) Date(s) the permit to construct was issued.
- (x) Condition number(s) as indicated on the permit to construct.
- (x) Description of the permit condition(s) and the reason(s) why they are believed to be obsolete, extraneous, or insignificant.

**Part D      NOT APPLICABLE**

- ( ) Description of all alternate operating scenarios that apply to an emissions unit.
- ( ) Number assigned to each scenario.
- ( ) Emissions unit number.

**MARYLAND DEPARTMENT OF THE ENVIRONMENT  
AIR AND RADIATION ADMINISTRATION  
RENEWAL TITLE V APPLICATION CHECKLIST**

- ( ) Description of the operating parameters for the emissions unit and other information which describes the how the operation of the unit will change under the different scenario.

**Part E NOT APPLICABLE**

- ( ) A citation and description of each federally enforceable requirement triggered by an operating scenario, including all emission standards, for each emissions unit.
- ( ) As an attachment, the date and results of the most recent compliance demonstration for each emission standard and/or emissions certification report with relevant supporting documentation.
- ( ) A statement of compliance demonstration techniques for each requirement, including a description of monitoring, record keeping, reporting requirements, and test methods.
- ( ) The frequency of submittal of the compliance demonstration during the permit term.

**Section 4 CONTROL EQUIPMENT**

- (x) The type of each piece of air pollution control equipment
- (x) The capture and control efficiencies of the control equipment.

**Section 5 SUMMARY SHEET OF POTENTIAL EMISSIONS  
NOT APPLICABLE**

- ( ) Quantity of potential emissions for criteria pollutants and HAPs emitted in tons per year for each emissions unit.
- ( ) Fugitive emission estimations for the entire facility for criteria pollutants and HAPs emitted in tons per year.
- ( ) Basis for all emission calculations.

**Section 6 AN EXPLANATION OF PROPOSED EXEMPTIONS  
FROM OTHERWISE APPLICABLE FEDERALLY  
ENFORCEABLE REQUIREMENTS  
NOT APPLICABLE**

- ( ) An explanation of the proposed exemption.

**MARYLAND DEPARTMENT OF THE ENVIRONMENT  
AIR AND RADIATION ADMINISTRATION  
RENEWAL TITLE V APPLICATION CHECKLIST**

**Section 7      COMPLIANCE SCHEDULE FOR NONCOMPLYING  
EMISSIONS UNITS**

**NOT APPLICABLE**

- ( ) Identification of emissions unit(s) not in compliance, including the requirement being violated and the effective compliance date.
  
- ( ) Detailed description of methods to be used to achieve compliance.
  
- ( ) A schedule of remedial measures, including an enforceable sequence of actions with milestones.

**Attachment**

- (x) Checklist of Insignificant Activities
  
- ( ) CAM Plan (If Applicable)



**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.   X   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;      **Propane vaporizer 931,200 BTU/hr propane**
- (2) No.      Fuel-burning equipment using solid fuel and having a heat input of less than 350,000 Btu (0.37 gigajoule) per hour;
- (3) No.      Stationary internal combustion engines with less than 500 brake horsepower (373 kilowatts) of power output
- (4)   X   Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (5)   X   Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;
- (6) No.   3   Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;      **3 parts washers used in maintenance**
- (7)      Commercial bakery ovens with a rated heat input capacity of less than 2,000,000 Btu per hour;
- (8)      Kilns used for firing ceramic ware, heated exclusively by natural gas, liquefied petroleum gas, electricity, or any combination of these;
- (9)      Confection cookers where the products are edible and intended for human consumption;
- (10)      Die casting machines;
- (11)      Photographic process equipment used to reproduce an image upon sensitized material through the use of radiant energy;
- (12)      Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;

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

- (13) \_\_\_\_ Brazing, soldering, or welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals and not directly related to plant maintenance, upkeep and repair or maintenance shop activities;
- (14) \_\_\_\_ Equipment for washing or drying products fabricated from metal or glass, provided that no VOC is used in the process and that no oil or solid fuel is burned;
- (15) \_\_\_\_ Containers, reservoirs, or tanks used exclusively for electrolytic plating work, or electrolytic polishing, or electrolytic stripping of brass, bronze, cadmium, copper, iron, lead, nickel, tin, zinc, and precious metals;
- (16) Containers, reservoirs, or tanks used exclusively for:
- (a) \_\_\_\_ Dipping operations for applying coatings of natural or synthetic resins that contain no VOC;
  - (b) \_\_\_\_ Dipping operations for coating objects with oils, waxes, or greases, and where no VOC is used;
  - (c)   X   Storage of butane, propane, or liquefied petroleum, or natural gas;  
                    2 propane tanks
  - (d) No. \_\_\_\_ Storage of lubricating oils:
  - (e) No. \_\_\_\_ Unheated storage of VOC with an initial boiling point of 300 °F (
  - (f) No.   1   Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel,   6,000 #2 Fuel Oil Tank
  - (g) No.   1   Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;
  - (h) No.  10  The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;
- (17) \_\_\_\_ Gaseous fuel-fired or electrically heated furnaces for heat treating glass or metals, the use of which does not involve molten materials;
- (18) Crucible furnaces, pot furnaces, or induction furnaces, with individual capacities of 1,000 pounds (454 kilograms) or less each, in which no sweating or distilling is conducted, or any fluxing is conducted using chloride, fluoride,



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

or ammonium compounds, and from which only the following metals are poured or in which only the following metals are held in a molten state:

- (a) \_\_\_\_ Aluminum or any alloy containing over 50 percent aluminum, if no gaseous chloride compounds, chlorine, aluminum chloride, or aluminum fluoride is used;
- (b) \_\_\_\_ Magnesium or any alloy containing over 50 percent magnesium;
- (c) \_\_\_\_ Lead or any alloy containing over 50 percent lead;
- (d) \_\_\_\_ Tin or any alloy containing over 50 percent tin;
- (e) \_\_\_\_ Zinc or any alloy containing over 50 percent zinc;
- (f) \_\_\_\_ Copper;
- (g) \_\_\_\_ Precious metals;
- (19) \_\_\_\_ Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a total cooking area of 5 square feet (0.46 square meter) or less;
- (20) X First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;
- (21) \_\_\_\_ Certain recreational equipment and activities, such as fireplaces, barbecue pits and cookers, fireworks displays, and kerosene fuel use;
- (22) X Potable water treatment equipment, not including air stripping equipment;
- (23) \_\_\_\_ Firing and testing of military weapons and explosives;
- (24) \_\_\_\_ Emissions resulting from the use of explosives for blasting at quarrying operations and from the required disposal of boxes used to ship the explosive;
- (25) X Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;
- (26) \_\_\_\_ Grain, metal, or mineral extrusion presses;
- (27) \_\_\_\_ Breweries with an annual beer production less than 60,000 barrels;

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

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

(29) X Laboratory fume hoods and vents;

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

*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      Biological wastewater treatment plant, used only as a backup to POTW

No. \_\_\_\_      \_\_\_\_\_

No. 1      Ammonia refrigeration system fugitive emissions (COMAR 26.11.02.10x(3)(c))

No. \_\_\_\_      \_\_\_\_\_

No. \_\_\_\_      \_\_\_\_\_

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

No. \_\_\_\_      \_\_\_\_\_

No. \_\_\_\_      \_\_\_\_\_

No. \_\_\_\_      \_\_\_\_\_



**PART 70 PERMIT APPLICATION FOR RENEWAL**  
**AIR AND RADIATION MANAGEMENT ADMINISTRATION**

Facilities required to obtain a Part 70 permit under COMAR 26.11.03.01 must complete and return this form. Applications are incomplete unless all applicable information required by COMAR 26.11.03.03 and 26.11.03.13 is supplied. Failure to supply additional information required by the Department to enable it to act on the application may result in loss of the application shield and denial of this application.

**Owner and Operator:**

Name of Owner or Operator: <b>Maryland &amp; Virginia Milk Producers Cooperative Association, Inc.</b>		
Street Address: <b>8321 Leishear Road</b>		
City: <b>Laurel</b>	State: <b>MD</b>	Zip Code: <b>20723</b>
Telephone Number <b>301-953-2964, ext. 1211</b>		Fax Number <b>301-953-1979</b>

**Facility Information:**

Name of Facility: <b>Maryland and Virginia Milk Producers Cooperative Association, Inc.</b>		
Street Address: <b>8321 Leishear Road</b>		
City: <b>Laurel</b>	State: <b>MD</b>	Zip Code: <b>20723</b>
Plant Manager: <b>John Rees</b>	Telephone Number: <b>301-953-2964 ext: 1211</b>	Fax Number: <b>301-953-1979</b>
24-Hour Emergency Telephone Number for Air Pollution Matters: <b>301-532-2593</b>		

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

**Names and telephone numbers of other facility contacts:**

Donnel Bell  
Plant Engineering Manager  
410-792-7960 ext: 1275  
C 202-763-6676

Todd Eagle  
Sr. EHS Manager  
C 803-280-9552

**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:

- ☒ [X] has been submitted;
- ☐ [ ] will be submitted at a future date; or
- ☐ [ ] does not need to be submitted.

## MARYLAND DEPARTMENT OF THE ENVIRONMENT

---

**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   
SIGNATURE

1/26/24  
DATE

John Rees

PRINTED NAME

Director of Operations

TITLE

# MARYLAND DEPARTMENT OF THE ENVIRONMENT

## 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).
<b>The facility serves to balance the local fluid milk market during periods when</b>
<b>supply exceeds demand. Excess raw milk is converted into non-perishable</b>
<b>forms: condensed milk, powdered milk and butter. The raw milk is separated</b>
<b>into cream and skim. The cream is pasteurized and churned to produce</b>
<b>butter (secondary SIC 2021). The skim is condensed to produce skim</b>
<b>condensed milk and then spray dried to produce non-fat powdered milk</b>
<b>(primary SIC 2023).</b>

### 2. Facility-Wide Emissions

- A. This facility is required to obtain a Part 70 Operating Permit because it is:  
Check appropriate box:  
☐ Actual Major  
☒ Potential Major  
☐ Solid Waste Incineration Unit Requiring Permit Under § 129(e) of CAA

B. List the actual facility-wide emissions below: **(tons/year)** *(Based on 2017 actual emissions)*

PM10 15.47 NOx 5.43 VOC 0.79 SOx 0.09 CO 7.00 HAPs 0.011

### 3. Include With the Application:

Flow Diagrams showing all emissions units, emission points, and control devices; **(Attachment 1)**

Emissions Certification Report (copy of the most recent submitted to the Department.) **(Attachment 3)**



# MARYLAND DEPARTMENT OF THE ENVIRONMENT

## SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: <b>EU-1</b>  1a. Date of installation (month/year): <b>1979</b>	2. MDE Registration No.:(if applicable)  <div style="text-align: center;"><b>13-4-0066</b></div>												
3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):  <div style="border: 1px solid black; padding: 5px; min-height: 100px;"> <u>The Keeler Boiler is used to produce steam for plant operations, heating, etc. The unit has a heat rated input capacity of 49 MMBTU/hr. Steam is emitted from one point in the unit which is designated as EP1.</u> </div>													
4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit: General Reference: <u>N/A</u>  Continuous Processes: <u>24</u> hours/day <u>365</u> days/year Batch Processes: <u>                    </u> hours/batch <u>                    </u> batches/day <u>                    </u> days/year													
5. Fuel Consumption: <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; border-bottom: 1px solid black;"><u>Type(s) of Fuel</u></th> <th style="text-align: left; border-bottom: 1px solid black;"><u>% Sulfur</u></th> <th style="text-align: left; border-bottom: 1px solid black;"><u>Annual Usage (specify units)</u></th> </tr> </thead> <tbody> <tr> <td>1. <u>Natural Gas</u></td> <td><u>0.00006</u></td> <td><u>81,082,453 cu. ft.</u></td> </tr> <tr> <td>2. <u>Propane</u></td> <td><u>0.001</u></td> <td><u>demand only</u></td> </tr> <tr> <td>3. <u>                    </u></td> <td><u>                    </u></td> <td><u>                    </u></td> </tr> </tbody> </table>		<u>Type(s) of Fuel</u>	<u>% Sulfur</u>	<u>Annual Usage (specify units)</u>	1. <u>Natural Gas</u>	<u>0.00006</u>	<u>81,082,453 cu. ft.</u>	2. <u>Propane</u>	<u>0.001</u>	<u>demand only</u>	3. <u>                    </u>	<u>                    </u>	<u>                    </u>
<u>Type(s) of Fuel</u>	<u>% Sulfur</u>	<u>Annual Usage (specify units)</u>											
1. <u>Natural Gas</u>	<u>0.00006</u>	<u>81,082,453 cu. ft.</u>											
2. <u>Propane</u>	<u>0.001</u>	<u>demand only</u>											
3. <u>                    </u>	<u>                    </u>	<u>                    </u>											
6. Emissions in Tons: A. Actual Major: <u>                    </u> Potential Major: <u><b>X</b></u> (note: before control device) B. Actual Emissions: NOx <u><b>2.26</b></u> SOx <u><b>0.01</b></u> VOC <u><b>0.12</b></u> PM10 <u><b>0.04</b></u> HAPs <u><b>0.00</b></u>													

### SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

# MARYLAND DEPARTMENT OF THE ENVIRONMENT

## SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

<b>1. Emissions Unit No.:</b> <b>EU-5</b>  <b>1a. Date of installation (month/year):</b> <b>4/97</b>	<b>2. MDE Registration No.:(if applicable)</b>  <b>13-8-0052</b>												
<b>3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):</b>  <u>The Niro Compact Spray Dryer is used to evaporate skim condensed milk and produce non-fat dry milk. Outside air is pumped across the unit and super heated to approximately 440°F in order to evaporate the milk. The unit is rated at 12,000 pph. Emissions are controlled by 3 cyclone collectors and 2 baghouses. The unit has one stack which is designated EP5.</u>     													
<b>4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit:</b> <b>General Reference:</b> <u>N/A</u>  <b>Continuous Processes:</b> <u>24</u> hours/day <u>365</u> days/year <b>Batch Processes:</b> _____ hours/batch _____ batches/day _____ days/year													
<b>5. Fuel Consumption:</b> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; border-bottom: 1px solid black;">Type(s) of Fuel</th> <th style="text-align: left; border-bottom: 1px solid black;">% Sulfur</th> <th style="text-align: left; border-bottom: 1px solid black;">Annual Usage (specify units)</th> </tr> </thead> <tbody> <tr> <td>1. Natural Gas</td> <td>0.00006</td> <td>119,361,600 cu ft</td> </tr> <tr> <td>2. Propane</td> <td>0.001 (demand only)</td> <td>0 cu ft</td> </tr> <tr> <td>3. _____</td> <td></td> <td></td> </tr> </tbody> </table>		Type(s) of Fuel	% Sulfur	Annual Usage (specify units)	1. Natural Gas	0.00006	119,361,600 cu ft	2. Propane	0.001 (demand only)	0 cu ft	3. _____		
Type(s) of Fuel	% Sulfur	Annual Usage (specify units)											
1. Natural Gas	0.00006	119,361,600 cu ft											
2. Propane	0.001 (demand only)	0 cu ft											
3. _____													
<b>6. Emissions in Tons:</b> A. Actual Major: _____ Potential Major: <u>X</u> (note: before control device) B. Actual Emissions: NOx <u>0.005</u> SOx <u>0.036</u> VOC <u>0.328</u> PM10 <u>0.113</u> HAPs <u>0.1121</u>													

MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

Emissions Unit No.: EU-1, EU-3, EU-5 General Reference: Permit #24-027-00052

Briefly describe the Emission Standard/Limit or Operational Limitation:

Requires the Permit Holder to submit to MDE, for the previous calendar year, a certified  
emissions statement.

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: \_\_\_\_\_  
☒ Annual Compliance Certification: \_\_\_\_\_  
☐ Semi-Annual Monitoring Report: \_\_\_\_\_

Methods used to demonstrate compliance:

Monitoring: Reference \_\_\_\_\_ Describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Testing: Reference 2017 Emissions Certification Describe: Calculated based on AP42  
\_\_\_\_\_  
\_\_\_\_\_

Record Keeping: Reference COMAR 26.11.02.19 Describe: All records necessary to support the  
emission certification will be kept on site for at least five years.  
\_\_\_\_\_  
\_\_\_\_\_

Reporting: Reference COMAR 26.11.02.19 Describe: An emissions statement will be  
submitted by April 1 each year. The actual emissions from each source will be certified by the  
appropriate company representative.  
\_\_\_\_\_  
\_\_\_\_\_

Frequency of submittal of the compliance demonstration: Annual

MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

Emissions Unit No.: EU-1, EU-3, EU-5 General Reference: Permit #24-027-00052

Briefly describe the Emission Standard/Limit or Operational Limitation:

**Requires the Permit Holder to report periods of excess emissions to MDE. COMAR 26.11.06.03B (2) limits particulate matter emissions to 0.36 lb/Mbtu heat input.**

**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 40 CFR 70 Describe: Units are checked daily for visible emissions.

Testing: Reference 2017 Emissions Certification Describe: Calculated based on AP42

Record Keeping: Reference COMAR 26.11.02.19 Describe: All records necessary to support the emission certification will be kept on site for at least five years.

Reporting: Reference COMAR 26.11.02.19 Describe: An emissions statement will be submitted by April 1 each year. The actual emissions from each source will be certified by the appropriate company representative.

Frequency of submittal of the compliance demonstration: Annual

MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

Emissions Unit No.: EU-1, EU-3, EU-5 General Reference: Permit #24-027-00052

Briefly describe the Emission Standard/Limit or Operational Limitation:

**Requires the Permit Holder to obtain a Permit to construct if an installation is modified such that there is a change in the quality, nature, or characteristics of emissions from the source.**

**Compliance Demonstration:**

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: \_\_\_\_\_  
☒ Annual Compliance Certification: \_\_\_\_\_  
☐ Semi-Annual Monitoring Report: \_\_\_\_\_

Methods used to demonstrate compliance:

Monitoring: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

Testing: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

Record Keeping: Reference 40 CFR 70 Describe: **The permit and other pertinent records will be kept on site and available for review.**

Reporting: Reference 40 CFR 70 Describe: **All pertinent information will be submitted to MDE prior to construction.**

**Frequency of submittal of the compliance demonstration:** Prior to new construction

MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

Emissions Unit No.: EU-1, EU-3 General Reference: Permit #24-027-00052

Briefly describe the Emission Standard/Limit or Operational Limitation:

**Requires the Permit Holder to obtain and have in current effect a State Permit to operate from MDE.**

**Compliance Demonstration:**

Check appropriate reports required to be submitted:

☐ Quarterly Monitoring Report: \_\_\_\_\_

☒ Annual Compliance Certification: \_\_\_\_\_

☐ Semi-Annual Monitoring Report: \_\_\_\_\_

Methods used to demonstrate compliance:

Monitoring: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

Testing: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

Record Keeping: Reference 40 CFR 70 Describe: **Records necessary for permit renewal will be kept on site and available for review.**

Reporting: Reference 40 CFR 70 Describe: **A new permit application will be submitted to the Department prior to the current permit expiration date.**

**Frequency of submittal of the compliance demonstration:** Prior to permit expiration

MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

Emissions Unit No.: EU-1, EU-3 General Reference: Permit #24-027-00052

Briefly describe the Emission Standard/Limit or Operational Limitation:

**Prohibits visible emissions other than water in an uncombined form.**

Compliance Demonstration:

Check appropriate reports required to be submitted:

☐ Quarterly Monitoring Report: \_\_\_\_\_

☒ Annual Compliance Certification: \_\_\_\_\_

☐ Semi-Annual Monitoring Report: \_\_\_\_\_

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.09.05A Describe: **Requires that the boilers are properly operated and maintained. Operations Manuals and a Preventive Maintenance Plan will also be maintained on site. When burning natural gas, no visible emissions observations are required. When burning No. 2 fuel oil (EU-3 only), visible emissions observations are required using EPA Reference Method 22, and for every 168 hours that the boilers burn No. 2 fuel oil, the Permittee shall perform one 30-minute observation. If emissions are visible to the human observer, the following actions will be taken: inspect the combustion control systems and boiler operations, perform all necessary adjustments and/or repairs to the boilers within 48 hrs. so that visible emissions are eliminated, document in writing the results of the inspections, adjustments and/or repairs to the boiler, and perform Method 9 observation once daily for 18 minutes until corrective action has achieved compliance.**

Testing: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

Record Keeping: Reference COMAR 26.11.03.06 Describe: **A record of the results of the observations shall be maintained on site for at least 5 years and made available to the Department upon request. Also a log of maintenance performed on the boilers and training provided to the boiler operators will be maintained.**

Reporting: Reference COMAR 26.11.03.06 Describe: **Report on a calendar quarter basis those periods when visible emissions are observed.**

Frequency of submittal of the compliance demonstration: Upon request



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

Emissions Unit No.: EU-5 General Reference: Permit #24-027-00052

Briefly describe the Emission Standard/Limit or Operational Limitation:

**Prohibits visible emissions other than water in an uncombined form.**

**Compliance Demonstration:**

Check appropriate reports required to be submitted:

☐ Quarterly Monitoring Report: \_\_\_\_\_

☒ Annual Compliance Certification: \_\_\_\_\_

☐ Semi-Annual Monitoring Report: \_\_\_\_\_

Methods used to demonstrate compliance:

**Monitoring: Reference COMAR 26.11.06.02C(2) Describe: Requires that the dryer, cyclone and baghouse are properly operated and maintained. An Operations Manual and Preventive Maintenance Plan will also be maintained on site. Verify no visible emissions from the dryer flue gas stack and product stack. The dryer only burns gaseous fuels, natural gas and propane (demand only). An observer shall perform a visual observation of the common stack for visible emissions for a 6-minute once a month. The permittee shall perform the following, if emissions are visible to the human observer: (a) Inspect combustion control system and dryer operations; (b) Perform all necessary adjustments and/or repairs to the dryer within 48 hours, so that visible emissions are eliminated; (c) Document in writing the results of the inspections, adjustments and/or repairs to the dryer; and (d) After 48 hours, if the required adjustments and/or repairs have not eliminated the visible emissions, take additional remedial actions and continue to perform Method 9 observation once daily for 18 minutes until corrective action has achieved compliance.**

Testing: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

**Record Keeping: Reference COMAR 26.11.03.06 Describe: A record of the results of the observations shall be maintained on site for at least 5 years and made available to the Department upon request. A log of maintenance performed on the dryer and control systems and training provided to the dryer operators will also be maintained.**

**Reporting: Reference COMAR 26.11.03.06 Describe: Report on a calendar quarter basis those periods when visible emissions are observed.**

Frequency of submittal of the compliance demonstration: Upon request

MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

Emissions Unit No.: EU-1, EU-3 General Reference: Permit #24-027-00052

Briefly describe the Emission Standard/Limit or Operational Limitation:

Allows visible emissions, during periods of start-up, adjustments, soot blowing, load changing, or  
cleaning control equipment, not to exceed 40% opacity for more than six consecutive minutes in  
any 60-minute period.

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: \_\_\_\_\_  
☒ Annual Compliance Certification: \_\_\_\_\_  
☐ Semi-Annual Monitoring Report: \_\_\_\_\_

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.09.05A(3) Describe: Requires that the boilers are properly  
operated and maintained. Operations Manuals and a Preventive Maintenance Plan will also be maintained on site.  
When burning natural gas, no visible emissions observations are required. When burning No. 2 fuel oil, visible  
emissions observations are required using EPA Reference Method 22, and for every 168 hours that the boilers burn  
No. 2 fuel oil, the Permittee shall perform one 30-minute observation. If emissions are visible to the human observer,  
the following actions will be taken: inspect the combustion control systems and boiler operations, perform all  
necessary adjustments and/or repairs to the boilers within 48 hrs. so that visible emissions are eliminated, document  
in writing the results of the inspections, adjustments and/or repairs to the boilers, and perform Method 9 observation  
once daily for 18 minutes until corrective action has achieved compliance.

Testing: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

Record Keeping: Reference COMAR 26.11.03.06 Describe: A record of the results of the  
observations shall be maintained on site for at least 5 years and made available to the Department  
upon request. Also a log of maintenance performed on the boilers and training provided to the  
boiler operators will be maintained.

Reporting: Reference COMAR 26.11.03.06 Describe: Report on a calendar quarter basis  
those periods when visible emissions are observed.

Frequency of submittal of the compliance demonstration: Upon request

MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

Emissions Unit No.: EU-1, EU-3 General Reference: Permit #24-027-00052

Briefly describe the Emission Standard/Limit or Operational Limitation:

**Limits the sulfur content of fuel to 0.3 percent in distillate fuel oil. Applicable to EU-3 only.**

**EU-1 is not capable of burning fuel oil.**

**Compliance Demonstration:**

Check appropriate reports required to be submitted:

☐ Quarterly Monitoring Report: \_\_\_\_\_

☒ Annual Compliance Certification: \_\_\_\_\_

☐ Semi-Annual Monitoring Report: \_\_\_\_\_

Methods used to demonstrate compliance:

Monitoring: Reference **COMAR 26.11.09.07A(2)(b)** Describe: **Obtain fuel oil supplier certifications that include the name of the fuel supplier and a certified statement from the supplier verifying that the oil complies with the 0.3% by weight sulfur content.**

Testing: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

Record Keeping: Reference **COMAR 26.11.09.07A(2)(b)** Describe: **Fuel certification records will be kept on site for at least 5 years.**

Reporting: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

**Frequency of submittal of the compliance demonstration: Upon request**

MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

Emissions Unit No.: EU-1, EU-3 General Reference: Permit #24-027-00052

Briefly describe the Emission Standard/Limit or Operational Limitation:

Requires the boiler to be operated in accordance with the specifications and operating procedure  
contained in the permit application or specified by the equipment vendors. Fuel use will be  
limited to burning natural gas, propane (EU-1 only), and #2 distillate fuel oil (EU-3 only).

Compliance Demonstration:

Check appropriate reports required to be submitted:

☐ Quarterly Monitoring Report: \_\_\_\_\_

☒ Annual Compliance Certification: \_\_\_\_\_

☐ Semi-Annual Monitoring Report: \_\_\_\_\_

Methods used to demonstrate compliance:

Monitoring: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

Testing: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

Record Keeping: Reference Permit #24-027-00052 Describe: Monthly records of fuel consumption  
will be maintained on site for at least five years.

Reporting: Reference 40 CFR 70 Describe: Records will be made available upon request.

Frequency of submittal of the compliance demonstration: Upon request

MARYLAND DEPARTMENT OF THE ENVIRONMENT

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

Emissions Unit No.: EU-5

General Reference: Permit #24-027-00052

Briefly describe the Emission Standard/Limit or Operational Limitation:

Limits particulate emissions from the dryer to 0.03 grains per standard cubic foot of dry exhaust gas.

Compliance Demonstration:

Check appropriate reports required to be submitted:

- ☐ Quarterly Monitoring Report: \_\_\_\_\_  
☒ Annual Compliance Certification: \_\_\_\_\_  
☐ Semi-Annual Monitoring Report: \_\_\_\_\_

Methods used to demonstrate compliance:

Monitoring: Reference COMAR 26.11.06.03B(2) Describe: Requires that the dryer, cyclone and baghouse are properly operated and maintained. An Operations Manual and Preventive Maintenance Plan will also be maintained on site. Verify no visible emissions from the dryer flue gas stack and product stack. An observer shall perform a visual observation of the common stack for visible emissions for a 6-minute once a month. The permittee shall perform the following, if emissions are visible to the human observer: (a) Inspect combustion control system and dryer operations; (b) Perform all necessary adjustments and/or repairs to the dryer within 48 hours, so that visible emissions are eliminated; (c) Document in writing the results of the inspections, adjustments and/or repairs to the dryer; and (d) After 48 hours, if the required adjustments and/or repairs have not eliminated the visible emissions, take additional remedial actions and continue to perform Method 9 observation once daily for 18 minutes until corrective action has achieved compliance.

Testing: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

Record Keeping: Reference COMAR 26.11.03.06 Describe: A record of the results of the observations shall be maintained on site for at least 5 years and made available to the Department upon request. A log of maintenance performed on the dryer and control systems and training provided to the dryer operators will be maintained.

Reporting: Reference COMAR 26.11.03.06 Describe: Report on a calendar quarter basis those periods when visible emissions are observed.

Frequency of submittal of the compliance demonstration: Upon request

MARYLAND DEPARTMENT OF THE ENVIRONMENT

SECTION 3C. OBSOLETE, EXTRANEEOUS, OR INSIGNIFICANT PERMIT CONDITIONS

List permit to construct conditions which should be considered to be obsolete, extraneous, or environmentally insignificant.

Emissions Unit No.: N/A Permit to Construct No. \_\_\_\_\_

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



**MARYLAND DEPARTMENT OF THE ENVIRONMENT**

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

**Scenario No.:** N/A

**Emissions Unit No.:** \_\_\_\_\_ **General Reference:** \_\_\_\_\_

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

---

---

---

---

---

---

**Compliance Demonstration**

Methods used to demonstrate compliance:

Monitoring: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

---

---

---

Testing: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

---

---

---

Record Keeping: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

---

---

---

Reporting: Reference \_\_\_\_\_ Describe: \_\_\_\_\_

---

---

---

**Frequency of submittal of the compliance demonstration:** \_\_\_\_\_



# MARYLAND DEPARTMENT OF THE ENVIRONMENT

## SECTION 4. CONTROL EQUIPMENT

1. <u>Associated Emissions Units No. :</u> <div style="text-align: center;"><b>EU-5</b></div>	2. <u>Emissions Point No.:</u> <div style="text-align: center;"><b>EP5</b></div>
3. <u>Type and Description of Control Equipment :</u> <b>Niro Hudson, Inc. (3) Multiple Cyclone Collectors and (2) Baghouses.</b>	
4. Pollutants Controlled:	Control Efficiency:
<b>The control equipment is used to monitor the</b>	
<b>percent solids at final product. Skim is 9%</b>	
<b>solids and 91% water. The solids content in</b>	
<b>condensed milk is 30-36%. The solids content</b>	
<b>in powdered milk is 96%.</b>	
5. Capture Efficiency:  <b>0.0087 grain/ft<sup>3</sup></b>	

# MARYLAND DEPARTMENT OF THE ENVIRONMENT

## SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

**List all applicable pollutants in tons per year (tpy) pertaining to this facility. The Emissions Unit No. should be consistent with numbers used in Section 3. Attach a copy of all calculations.**

Pollutant	N/A				
CAS Number					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
<b>Fugitive Emissions</b>					
<b>Total</b>					

**MARYLAND DEPARTMENT OF THE ENVIRONMENT**

**SECTION 6. EXPLANATION OF PROPOSED EXEMPTIONS FROM  
OTHERWISE APPLICABLE FEDERALLY ENFORCEABLE  
REQUIREMENTS**

**Describe and cite the applicable requirements to be exempted. Complete this Section only if the facility is claiming exemptions from or the non-applicability of any federally enforceable requirements.**

1. Applicable Requirement: N/A

2. Brief Description:

---

---

---

---

---

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

---

---

---

---

---

---

---

---

## MARYLAND DEPARTMENT OF THE ENVIRONMENT

### SECTION 7. COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS

1. Emissions Unit # N/A	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.

This Page Intentionally Left Blank.

MARYLAND DEPARTMENT OF THE ENVIRONMENT

STATE-ONLY ENFORCEABLE REQUIREMENTS

Facility Information:

Name of Facility: <b>Maryland and Virginia Milk Producers Cooperative Association, Inc.</b>	County <b>Howard</b>
Premises Number: <b>0052</b>	
Street Address: <b>8321 Leishear Road</b>	
24-hour Emergency Telephone Number for Air Pollution Matters: <b>410-487-1086</b>	
Type of Equipment (List Significant Units):	
<b>EU-1– Keeler Boiler rated at 49 Mbtu/hr heat input. Permitted to burn natural gas and propane</b>	
<b>EU-3 –Cleaver Brooks 29 Mbtu/hr heat input. Permitted to burn natural gas and No. 2 fuel oil</b>	
<b>EU-5 – Niro Compact Spray Dryer used for drying milk rated at 12,000 pph. Permitted to burn natural gas and propane and is controlled by a cyclone dust collector.</b>	

MARYLAND DEPARTMENT OF THE ENVIRONMENT

CITATION TO AND DESCRIPTION OF APPLICABLE STATE ONLY  
ENFORCEABLE REQUIREMENTS

Registration No.: 4-0065, 4-0066, 8-0170, 8-0052

Emissions Unit No.: EU-1 / EU-3 / EU-5 General Reference: Permit #24-027-00052

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

**COMAR 26.11.06.08 and .09 Prohibits the discharge of emissions beyond the property line in such a manner that a nuisance or air pollution is created.**

Methods used to demonstrate compliance:

**The dryer baghouses are checked daily for visible emissions and pressure drops. All other units are checked daily for visible emissions.**

MARYLAND DEPARTMENT OF THE ENVIRONMENT

CITATION TO AND DESCRIPTION OF APPLICABLE STATE ONLY  
ENFORCEABLE REQUIREMENTS

Registration No.: 4-0065, 4-0066, 8-0170, 8-0052

Emissions Unit No.: EU-1 / EU-3 / EU-5 General Reference: Permit #24-027-00052

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

**COMAR 26.11.09.08 Requires compliance with the emission standards in Section C of this regulation or submit a Reasonable Available Control Technology (RACT) proposal for NOx to the Department for review and approval.**

Methods used to demonstrate compliance:

**Requires boiler and dryer operators to attend an approved operator training program on NOx reduction sponsored by the Department, US EPA, or equipment vendors every three years. Perform combustion analysis for each combustion unit at least once each calendar year and optimize combustion based on analysis. Maintain a record of training program attendance for each operator at the site for not less than six years, and make available to the Department upon request.**



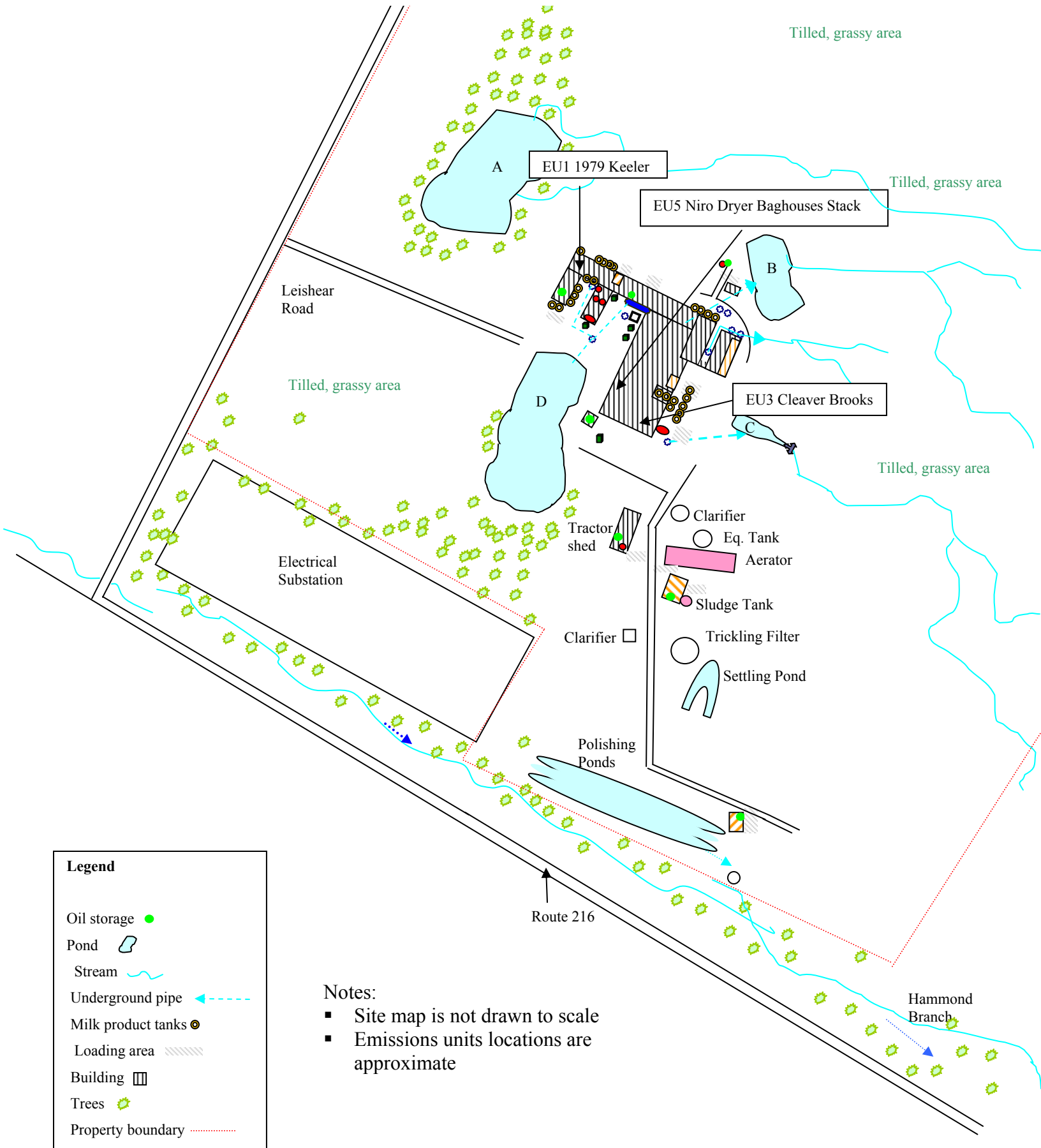
**ATTACHMENT 1**

**PROCESS FLOW DIAGRAM**



## **ATTACHMENT 2**

### **PLOT PLAN**



**Legend**

- Oil storage ●
- Pond
- Stream
- Underground pipe
- Milk product tanks
- Loading area
- Building
- Trees
- Property boundary

**Notes:**

- Site map is not drawn to scale
- Emissions units locations are approximate

**ATTACHMENT 3**

**EMISSIONS CERTIFICATION REPORT (2023)**



## Maryland & Virginia

Milk Producers Cooperative Association, Inc.

March 31, 2023

Mr. Dave Dat  
Maryland Department of the Environment  
Air & Radiation Management Administration  
1800 Washington Boulevard, Suite 715  
Baltimore, MD 21230

Re: Part 70 Operating Permit 24-027-0052

Dear Mr. Dat:

Enclosed are the documents necessary to complete our Emissions Certification Report for calendar year 2022.

Using EPA AP-42 factors and basing our calculations on natural gas usage of 244.6 million standard cubic feet, we report only two Hazardous Air Pollutants emitted above the minimum reporting threshold provided by the Department. For all other HAPS listed in Section 112(b) of the Clean Air Act, we calculate none emitted above the minimum reporting threshold.

If after review of the submitted documents you have questions remaining, please contact me at your convenience at 301-953-2964 X-1211 or through email at [mcurtis@mdvamilk.com](mailto:mcurtis@mdvamilk.com).

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.

*Mike Curtis*

Mike Curtis, Director of Operations

3/31/2023

Date

Enclosure



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) Curtis (First) Mike (MI) \_\_\_\_\_

Title Director of Operations

Street or P.O. Box 8321 Leishear Rd.

City Laurel State MD ZIP 20723 - \_\_\_\_\_

Telephone ( 301 ) 953 - 2964 Ext. 1211 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) Mike Curtis

Name (typed) Mike Curtis Date: 03 / 31 / 23

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: 2022

A. FACILITY IDENTIFICATION				<b>Do Not Write in This Space</b>	
Facility Name Maryland and Virginia Milk Producers Cooperative Association, Inc.				Date Received Regional	
Address 8321 Leishear Road				Date Received State	
City Laurel County Howard Zip Code 20723				AIRS Code	
B. Briefly describe the major function of the facility				FINDS Code	
Dry, condensed, and evaporated dairy products manufacturing				SIC Code	
				Facility Number:	
				TEMPO ID:	
C. SEASONAL PRODUCTION (% if applicable)				Reviewed by:	
<u>Winter</u> (Dec.-Feb.)	<u>Spring</u> (Mar – May)	<u>Summer</u> (Jun – Aug)	<u>Fall</u> (Sept – Nov)		
30.49	32.59	25.99	10.93		
				Name _____ Date _____	
D. Explain any increases or decreases in emissions from the previous calendar year for each registration at this facility.					
MDVA Laurel continues to maintain compliance with MD Air Toxics regulations.					
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 \_\_\_\_ pages (including attachments), and certify that the information is correct to the best of my knowledge.

Mike Curtis	Director of Operations	March 31, 2023
Name (Print/Type)	Title	Date
<i>Mike Curtis</i>		301-953-2964 X-1211
Signature		Telephone



**2022**  
**Hours run time-Natural Gas**

**Emitting Unit meter readings**

Date	Dryer	Boilers			
	<u>Niro</u>	<u>Cleaver-Brooks</u>	<u>79 Keeler</u>		
1/1/2022	See Meter Readings	See Meter Readings			
12/31/2022	J19	M19		P19	
run hrs.	3182		8400	8568	
run days	133		350	357	

total boiler run days 707

50% 50%  
*boiler gas consumption by unit*

**Total Purchases/ Usage**

Gas Meters (in thousands cu ft.)	
at Cleaver-Brooks	Main
See Meter Readings	See Meter Readings
D19	G19
total purchase	280,249,907
(in cu ft.)	from gas bills

**Usage by Emitting Unit**

(known)

Niro uses 360 cu.ft./min, times 3182 hrs. equals 68,731,200 cubic feet

(theoretical)

total purchases minus Niro usage equals total boiler usage of 211,518,707 cubic feet

Cleaver-Brooks used 104,712,231 cubic feet

79 Keeler used 106,806,476 cubic feet

**None burned in 2022**

<b>Lead</b>	<u>68,731,200</u> cubic feet	<b>X</b>	<u>0.0005</u> pounds	<b>equals</b>	0.0003 pounds per day
	<u>132.58</u> days		1,000,000 cubic feet		0.0000 pounds per hour
					0.0000 tons per year

Niro Dryer  
Reg. No. 8-0052

<b>CO2</b>	<u>68,731,200</u> <u>132.58</u>	cubic feet days	<b>X</b>	<u>120000</u> 1,000,000	pounds cubic feet	equals	62208.000 pounds per day 2592.000 pounds per hour 4123.872 tons per year
<b>Methane</b>	<u>68,731,200</u> <u>132.58</u>	cubic feet days	<b>X</b>	<u>2.3</u> 1,000,000	pounds cubic feet	equals	1.192 pounds per day 0.050 pounds per hour 0.079 tons per year
<b>Nitrous Oxide</b>	<u>68,731,200</u> <u>132.58</u>	cubic feet days	<b>X</b>	<u>0.6400</u> 1,000,000	pounds cubic feet	equals	0.3318 pounds per day 0.0138 pounds per hour 0.0220 tons per year
<b>Benzene</b>	<u>68,731,200</u> <u>132.58</u>	cubic feet days	<b>X</b>	<u>0.0021</u> 1,000,000	pounds cubic feet	equals	0.0011 pounds per day 0.0000 pounds per hour 0.0001 tons per year
<b>Formaldehyde</b>	<u>68,731,200</u> <u>132.58</u>	cubic feet days	<b>X</b>	<u>0.075</u> 1,000,000	pounds cubic feet	equals	0.0389 pounds per day 0.0016 pounds per hour 0.0026 tons per year
<b>Hexane</b>	<u>68,731,200</u> <u>132.58</u>	cubic feet days	<b>X</b>	<u>1.8</u> 1,000,000	pounds cubic feet	equals	0.9331 pounds per day 0.0389 pounds per hour 0.0619 tons per year
<b>Naphthalene</b>	<u>68,731,200</u> <u>132.58</u>	cubic feet days	<b>X</b>	<u>0.00061</u> 1,000,000	pounds cubic feet	equals	0.0003 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>Toluene</b>	<u>68,731,200</u> <u>132.58</u>	cubic feet days	<b>X</b>	<u>0.0034</u> 1,000,000	pounds cubic feet	equals equals	0.0018 pounds per day 0.0001 pounds per hour 0.0001 tons per year
<b>SELENIUM</b>	<u>68,731,200</u> <u>133</u>	cubic feet days	<b>X</b>	<u>0</u> 1,000,000	pounds cubic feet	equals equals	0.0000 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>MANGANESE</b>	<u>68,731,200</u> <u>133</u>	cubic feet days	<b>X</b>	<u>0.00038</u> 1,000,000	pounds cubic feet	equals equals	0.0002 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>MERCURY</b>	<u>68,731,200</u> <u>133</u>	cubic feet days	<b>X</b>	<u>0.00026</u> 1,000,000	pounds cubic feet	equals equals	0.0001 pounds per day 0.0000 pounds per hour 0.0000 tons per year

Niro Dryer Reg. No. 8-0052						
<b>NICKEL</b>	<u>68,731,200</u> <u>133</u>	cubic feet days	<b>X</b>	<u>0.0021</u> 1,000,000	pounds cubic feet	equals equals 0.0011 pounds per day 0.0000 pounds per hour 0.0001 tons per year
<b>ARSENIC</b>	<u>68,731,200</u> <u>133</u>	cubic feet days	<b>X</b>	<u>0.0002</u> 1,000,000	pounds cubic feet	equals equals 0.0001 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>BERYLLIUM</b>	<u>68,731,200</u> <u>133</u>	cubic feet days	<b>X</b>	<u>0</u> 1,000,000	pounds cubic feet	equals equals 0.0000 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>CADMIUM</b>	<u>68,731,200</u> <u>133</u>	cubic feet days	<b>X</b>	<u>0.0011</u> 1,000,000	pounds cubic feet	equals equals 0.0006 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>CHROMIUM</b>	<u>68,731,200</u> <u>133</u>	cubic feet days	<b>X</b>	<u>0.0014</u> 1,000,000	pounds cubic feet	equals equals 0.0007 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>COBALT</b>	<u>68,731,200</u> <u>133</u>	cubic feet days	<b>X</b>	<u>0.000084</u> 1,000,000	pounds cubic feet	equals equals 0.0000 pounds per day 0.0000 pounds per hour 0.0000 tons per year

#### Notes

1. Gas flow rate from baghouse from vendor rep, Greg Hougen, 1/28/2009 e-mail
2. NOx and CO emissions factors from vendor rep, Greg Hougen, 1/28/2009 e-mail  
All other emissions factors for combustion are from AP-42 Section 1.4 July 1998
3. PM emissions from natural gas combustion, per AP-42, are all assumed to have an aerodynamic diameter of 1 micron or less

#### NIRO DRYER EMISSIONS FROM PROCESS

<b>runtime is</b>	<u>132.58</u>	days
PM10 generation	5.5	pounds per hour from baghouse, per e-mail from vendor Greg Hougen on 1/28/2009
baghouse effic.	97.50%	
<b>PM-filterable<sup>4</sup></b>	11.63	lb/hr
	279.09	pounds per day
	18.50	tons per year
<b>PM 10-filterable<sup>4</sup></b>	5.50	lb/hr
	132.00	pounds per day
	8.75	tons per year
<b>PM 2.5-filterable<sup>4</sup></b>	0.83	lb/hr
	19.99	pounds per day
	1.33	tons per year
<b>PM Condensable<sup>5</sup></b>	0.00	lb/hr

Niro Dryer  
Reg. No. 8-0052

0.00 pounds per day  
0.00 tons per year

**Notes**

4. PM emissions factor for baghouse from vendor Greg Hougen on 1/28/2009  
Filterable PM and PM2.5 converted from Filterable PM10 using ratio of k-factors from AP-42 Section 13.2.4
  5. Condensible PM is assume to be 0
- Informaton from Vendor representative, Greg Hougen on 1/28/2009  
Exhaust stack flow rate = 126,000 Nm3/hr (~6,700,000 scf/hr)  
Emissions factors for NOx and CO from vendor  
PM emissions rate 5.5 lb/hr from G. Hougent on 1/28/2009  
Baghouse efficiency 97.5%

Check grain loading vs lb/hr emissions:

74160.8007 cf/min  
0.0087 grains per cubic foot  
645.1989661 grains per minute  
38711.93797 grains per hour  
5.530276852 pounds per hour

Cleaver Brooks  
Boiler- 2004

2022

Size: 29 MMBTU/hr  
Capacity 207.14 gal oil/hr

2004 CLEAVER BROOKS EMISSIONS FROM NATURAL GAS COMBUSTION

runtime is	<u>104,712,231</u> 350.00	cubic feet days	X	"Runtime F37" "Runtime F11"			
NOX	<u>104,712,231</u> 350.00	cubic feet days	X	<u>32</u> 1,000,000	pounds cubic feet	equals	9.574 pounds per day 0.399 pounds per hour 1.675 tons per year
SOX	<u>104,712,231</u> 350.00	cubic feet days	X	<u>0.6</u> 1,000,000	pounds cubic feet	equals	0.180 pounds per day 0.007 pounds per hour 0.031 tons per year
CO	<u>104,712,231</u> 350.00	cubic feet days	X	<u>84</u> 1,000,000	pounds cubic feet	equals	25.131 pounds per day 1.047 pounds per hour 4.398 tons per year
VOC	<u>104,712,231</u> 350.00	cubic feet days	X	<u>5.5</u> 1,000,000	pounds cubic feet	equals	1.645 pounds per day 0.069 pounds per hour 0.288 tons per year
PM-filterable*	<u>104,712,231</u> 350.00	cubic feet days	X	<u>1.9</u> 1,000,000	pounds cubic feet	equals	0.568 pounds per day 0.024 pounds per hour 0.099 tons per year
PM 10-filterable*	<u>104,712,231</u> <u>350.00</u>	cubic feet days	X	<u>1.9</u> 1,000,000	pounds cubic feet	equals	0.568 pounds per day 0.024 pounds per hour 0.099 tons per year
PM 2.5-filterable*	<u>104,712,231</u> <u>350.00</u>	cubic feet days	X	<u>1.9</u> 1,000,000	pounds cubic feet	equals	0.568 pounds per day 0.024 pounds per hour 0.099 tons per year
PM- condensable*	<u>104,712,231</u> <u>350.00</u>	cubic feet days	X	<u>5.7</u> 1,000,000	pounds cubic feet	equals	1.705 pounds per day 0.071 pounds per hour 0.298 tons per year
Lead	<u>104,712,231</u> <u>350.00</u>	cubic feet days	X	<u>0.0005</u> 1,000,000	pounds cubic feet	equals	0.0001 pounds per day 0.0000 pounds per hour 0.0000 tons per year
CO2	<u>104,712,231</u> <u>350.00</u>	cubic feet days	X	<u>120000</u> 1,000,000	pounds cubic feet	equals	35901.336 pounds per day 1495.889 pounds per hour 6282.734 tons per year

Cleaver-Brooks  
Reg. No. MD122223

<b>Methane</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>X</b>	<u>2.3</u> 1,000,000	pounds cubic feet	equals		0.688 pounds per day 0.029 pounds per hour 0.120 tons per year
<b>Nitrous Oxide</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>X</b>	<u>0.6400</u> 1,000,000	pounds cubic feet	equals		0.1915 pounds per day 0.0080 pounds per hour 0.0335 tons per year
<b>Benzene</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>X</b>	<u>0.0021</u> 1,000,000	pounds cubic feet	equals		0.0006 pounds per day 0.0000 pounds per hour 0.0001 tons per year
<b>Formaldehyde</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>X</b>	<u>0.075</u> 1,000,000	pounds cubic feet	equals		0.0224 pounds per day 0.0009 pounds per hour 0.0039 tons per year
<b>Hexane</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>X</b>	<u>1.8</u> 1,000,000	pounds cubic feet	equals		0.5385 pounds per day 0.0224 pounds per hour 0.0942 tons per year
<b>Naphthalene</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>X</b>	<u>0.00061</u> 1,000,000	pounds cubic feet	equals		0.0002 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>Toluene</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>X</b>	<u>0.0034</u> 1,000,000	pounds cubic feet	equals equals		0.0010 pounds per day 0.0000 pounds per hour 0.0002 tons per year
<b>SELENIUM</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>0</b>	<u>0</u> 1,000,000	pounds cubic feet	equals	0	0.0000 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>MANGANESE</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>0</b>	<u>0.00038</u> 1,000,000	pounds cubic feet	equals	0	0.0001 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>MERCURY</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>0</b>	<u>0.00026</u> 1,000,000	pounds cubic feet	equals	0	0.0001 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>NICKEL</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>0</b>	<u>0.0021</u> 1,000,000	pounds cubic feet	equals	0	0.0006 pounds per day 0.0000 pounds per hour 0.0001 tons per year

Cleaver-Brooks  
Reg. No. MD122223

<b>ARSENIC</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>0</b>	<u>0.0002</u> 1,000,000	pounds cubic feet	0 equals	0.0001 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>BERYLLIUM</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>0</b>	<u>0</u> 1,000,000	pounds cubic feet	0 equals	0.0000 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>CADMIUM</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>0</b>	<u>0.0011</u> 1,000,000	pounds cubic feet	0 equals	0.0003 pounds per day 0.0000 pounds per hour 0.0001 tons per year
<b>CHROMIUM</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>0</b>	<u>0.0014</u> 1,000,000	pounds cubic feet	0 equals	0.0004 pounds per day 0.0000 pounds per hour 0.0001 tons per year
<b>COBALT</b>	<u>104,712,231</u> <u>350.00</u>	cubic feet days	<b>0</b>	<u>0.000084</u> 1,000,000	pounds cubic feet	0 equals	0.0000 pounds per day 0.0000 pounds per hour 0.0000 tons per year

**Notes**

All emissions factors are from AP-42 Section 1.4 July 1998

\*PM filterable emissions, per AP-42, are all assumed to have an aerodynamic diameter of 1 micron or less for fuel-burning equipment using natural gas.

**EMISSIONS FROM BURNING #2 FUEL OIL**

% sulfur = 0.30% in distillate fuel oil  
Oil heating value = 140 MMBTU/1000 gal per AP-42 Table 1.3-2

**fuel usage**      0.000 1000 gallons  
                         0.00 days      (10/16-3.0 hrs; 12/3-2.5 hrs)

<b>NOX</b>	0.0 gal 0.00 days	<b>X</b>	<u>20</u> 1,000	pounds gal	equals	0.000 pounds per day 0.000 pounds per hour 0.0000 tons per year
<b>SOX</b>	0.0 gal 0.00 days	<b>X</b>	<u>0.432</u> 1,000	pounds gal	equals	0.000 pounds per day 0.000 pounds per hour 0.000 tons per year
<b>CO</b>	0.0 gal 0.00 days	<b>X</b>	<u>5</u> 1,000	pounds gal	equals	0.000 pounds per day 0.000 pounds per hour 0.000 tons per year
<b>VOC</b>	0.0 gal 0.00 days	<b>X</b>	<u>0.2</u> 1,000	pounds gal	equals	0.000 pounds per day 0.000 pounds per hour 0.000 tons per year
<b>PM-filterable*</b>	0.0 gal 0.00 days	<b>X</b>	<u>2</u> 1,000	pounds gal	equals	0.000 pounds per day 0.000 pounds per hour 0.00000 tons per year



Cleaver-Brooks  
Reg. No. MD122223

<b>PM 10-filterable*</b>	0.0 gal 0.00 days	<b>X</b>	<u>1</u> 1,000	pounds gal	equals	0.000 pounds per day 0.000 pounds per hour 0.000000 tons per year
<b>PM 2.5-filterable*</b>	0.0 gal 0.00 days	<b>X</b>	<u>0.25</u> 1,000	pounds gal	equals	0.000 pounds per day 0.000 pounds per hour 0.000000 tons per year
<b>PM- condensable*</b>	0.0 gal 0.00 days	<b>X</b>	<u>1.3</u> 1,000	pounds gal	equals	0.000 pounds per day 0.000 pounds per hour 0.000 tons per year
<b>Lead</b>	0.0 gal 0.00 days	<b>X</b>	<u>9.0</u> 1E+12 140000.00 BTU/gal	pounds BTU	equals	0.0000 pounds per day 0.0000 pounds per hour 0.00E+00 tons per year
<b>CO2</b>	0.0 gal 0.00 days	<b>X</b>	<u>162.712</u> 1,000,000 140000 BTU/gal	pounds BTU	equals	0 pounds per day 0 pounds per hour 0 tons per year
<b>Methane</b>	0.0 gal 0.00 days	<b>X</b>	<u>0.052</u> 1,000	pounds gal	equals	0.000 pounds per day 0.000 pounds per hour 0.000 tons per year

Cleaver-Brooks  
Reg. No. MD122223

Nitrous Oxide	0.0 gal 0.00 days	X	$\frac{0.00132}{1,000,000}$	pounds BTU 140,000 BTU/gal	equals	0.000 pounds per day 0.000 pounds per hour 0.00E+00 tons per year
Benzene	0.0 gal 0.00 days	X	$\frac{0.000214}{1,000}$	pounds gal	equals	0.000 pounds per day 0.0000 pounds per hour 0.0000 tons per year
Formaldehyde	0.0 gal 0.00 days	X	$\frac{0.033}{1,000}$	pounds gal	equals	0.000 pounds per day 0.0000 pounds per hour 0.0000 tons per year
Naphthalene	0.0 gal 0.00 days	X	$\frac{0.00113}{1,000}$	pounds gal	equals	0.000 pounds per day 0.0000 pounds per hour 0.0000 tons per year
Toluene	0.0 gal 0.00 days	X	$\frac{0.0062}{1,000}$	pounds gal	equals	0.000 pounds per day 0.0000 pounds per hour 0.0000 tons per year
o-Xylene	0.0 gal 0.00 days	X	$\frac{0.000109}{1,000}$	pounds gal	equals	0.000 pounds per day 0.0000 pounds per hour 0.0000 tons per year
Cadmium	0.0 gal 0.04 days	X	3 1E+12	pounds BTU	equals	0.00E+00 pounds per day 0.00E+00 pounds per hour 0.00E+00 tons per year 140000 BTU/gal

1979 Keeler Boiler  
Reg. No. 4-0065

1979 Keeler  
Boiler

2022

Size: 49 MMBTU/hr

Does not burn oil  
Can burn Propane

None burned in 2022

runtime is	<u>106,806,476</u> 357.00	cubic feet days 4	X	"runtime F38" "runtime G11"			
NOX	<u>106,806,476</u> 357.00	cubic feet days	X	<u>100</u> 1,000,000	pounds cubic feet	equals	29.918 pounds per day 1.247 pounds per hour 5.340 tons per year
SOX	<u>106,806,476</u> 357.00	cubic feet days	X	<u>0.6</u> 1,000,000	pounds cubic feet	equals	0.180 pounds per day 0.007 pounds per hour 0.032 tons per year
CO	<u>106,806,476</u> 357.00	cubic feet days	X	<u>84</u> 1,000,000	pounds cubic feet	equals	25.131 pounds per day 1.047 pounds per hour 4.486 tons per year
VOC	<u>106,806,476</u> 357.00	cubic feet days	X	<u>5.5</u> 1,000,000	pounds cubic feet	equals	1.645 pounds per day 0.069 pounds per hour 0.294 tons per year
PM-filterable*	<u>106,806,476</u> 357.00	cubic feet days	X	<u>1.9</u> 1,000,000	pounds cubic feet	equals	0.568 pounds per day 0.024 pounds per hour 0.101 tons per year
PM 10-filterable*	<u>106,806,476</u> 357.00	cubic feet days	X	<u>1.9</u> 1,000,000	pounds cubic feet	equals	0.568 pounds per day 0.024 pounds per hour 0.101 tons per year
PM 2.5-filterable*	<u>106,806,476</u> 357.00	cubic feet days	X	<u>1.9</u> 1,000,000	pounds cubic feet	equals	0.568 pounds per day 0.024 pounds per hour 0.101 tons per year
PM- condensable*	<u>106,806,476</u> 357.00	cubic feet days	X	<u>5.7</u> 1,000,000	pounds cubic feet	equals	1.705 pounds per day 0.071 pounds per hour 0.304 tons per year
Lead	<u>106,806,476</u> 357.00	cubic feet days	X	<u>0.0005</u> 1,000,000	pounds cubic feet	equals	0.0001 pounds per day 0.0000 pounds per hour 0.0000 tons per year
CO2	<u>106,806,476</u> 357.00	cubic feet days	X	<u>120000</u> 1,000,000	pounds cubic feet	equals	35901.336 pounds per day 1495.889 pounds per hour 6408.389 tons per year

1979 Keeler Boiler  
Reg. No. 4-0065

<b>Methane</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>X</b>	<u>2.3</u> 1,000,000	pounds cubic feet	equals	0.688 pounds per day 0.029 pounds per hour 0.123 tons per year
<b>Nitrous Oxide</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>X</b>	<u>0.6400</u> 1,000,000	pounds cubic feet	equals	0.1915 pounds per day 0.0080 pounds per hour 0.0342 tons per year
<b>Benzene</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>X</b>	<u>0.0021</u> 1,000,000	pounds cubic feet	equals	0.0006 pounds per day 0.0000 pounds per hour 0.0001 tons per year
<b>Formaldehyde</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>X</b>	<u>0.075</u> 1,000,000	pounds cubic feet	equals	0.0224 pounds per day 0.0009 pounds per hour 0.0040 tons per year
<b>Hexane</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>X</b>	<u>1.8</u> 1,000,000	pounds cubic feet	equals	0.5385 pounds per day 0.0224 pounds per hour 0.0961 tons per year
<b>Naphthalene</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>X</b>	<u>0.00061</u> 1,000,000	pounds cubic feet	equals	0.0002 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>Toluene</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>X</b>	<u>0.0034</u> 1,000,000	pounds cubic feet	equals equals	0.0010 pounds per day 0.0000 pounds per hour 0.0002 tons per year
<b>SELENIUM</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>0</b>	<u>0</u> 1,000,000	pounds cubic feet	equals 0	0.0000 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>MANGANESE</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>0</b>	<u>0.00038</u> 1,000,000	pounds cubic feet	equals 0	0.0001 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>MERCURY</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>0</b>	<u>0.00026</u> 1,000,000	pounds cubic feet	equals 0	0.0001 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>NICKEL</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>0</b>	<u>0.0021</u> 1,000,000	pounds cubic feet	equals 0	0.0006 pounds per day 0.0000 pounds per hour 0.0001 tons per year
<b>ARSENIC</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>0</b>	<u>0.0002</u> 1,000,000	pounds cubic feet	equals 0	0.0001 pounds per day 0.0000 pounds per hour

1979 Keeler Boiler  
Reg. No. 4-0065

0.0000 tons per year

<b>BERYLLIUM</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>0</b>	<u>0</u> 1,000,000	pounds cubic feet	equals	<b>0</b>	0.0000 pounds per day 0.0000 pounds per hour 0.0000 tons per year
<b>CADMIUM</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>0</b>	<u>0.0011</u> 1,000,000	pounds cubic feet	equals	<b>0</b>	0.0003 pounds per day 0.0000 pounds per hour 0.0001 tons per year
<b>CHROMIUM</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>0</b>	<u>0.0014</u> 1,000,000	pounds cubic feet	equals	<b>0</b>	0.0004 pounds per day 0.0000 pounds per hour 0.0001 tons per year
<b>COBALT</b>	<u>106,806,476</u> <u>357.00</u>	cubic feet days	<b>0</b>	<u>0.000084</u> 1,000,000	pounds cubic feet	equals	<b>0</b>	0.0000 pounds per day 0.0000 pounds per hour 0.0000 tons per year

**Notes**

All emissions factors are from AP-42 Section 1.4 July 1998

\*PM emissions, per AP-42, are all assumed to have an aerodynamic diameter of 1 micron or less

2022

## TAPS that Must be Reported

	Total	Reporting Threshold	Reporting Required?
<b>Benzene</b>			
lb/hr	9.77E-05	0.01	No
ton/yr	2.94E-04	0.1	No
<b>Formaldehyde</b>			
lb/hr	3.49E-03	0.001	Yes
ton/yr	1.05E-02	0.01	Yes
<b>Hexane</b>			
lb/hr	8.38E-02	1	No
ton/yr	2.52E-01	10	No
<b>Naphthalene</b>			
lb/hr	2.84E-05	0.1	No
ton/yr	8.55E-05	1	No
<b>Toluene</b>			
lb/hr	1.58E-04	1	No
ton/yr	4.76E-04	10	No
<b>o-Xylene</b>			
lb/hr	0.00E+00	1	No
ton/yr	0.00E+00	10	No
<b>SELENIUM</b>			
lb/hr	0.00E+00	0.001	No
ton/yr	0.00E+00	0.01	No
<b>MANGANESE</b>			
lb/hr	1.77E-05	0.001	No
ton/yr	5.32E-05	0.01	No
<b>MERCURY</b>			
lb/hr	1.21E-05	0.0001	No
ton/yr	3.64E-05	0.001	No
<b>NICKEL</b>			
lb/hr	9.77E-05	0.001	No
ton/yr	2.94E-04	0.001	No
<b>ARSENIC</b>			
lb/hr	9.31E-06	0.0001	No
ton/yr	2.80E-05	0.0001	No
<b>BERYLLIUM</b>			
lb/hr	0.00E+00	0.00001	No
ton/yr	0.00E+00	0.0001	No
<b>CADMIUM</b>			
lb/hr	5.12E-05	0.0001	No
ton/yr	1.54E-04	0.0001	Yes
<b>CHROMIUM</b>			
lb/hr	6.51E-05	0.001	No
ton/yr	1.96E-04	0.01	No
<b>COBALT</b>			
lb/hr	3.91E-06	0.0001	No
ton/yr	1.18E-05	0.001	No

**FORM 2**

# CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: Maryland & Virginia Milk Producers      Facility ID# 027-00052      Pollutant: NOx      Calendar Year: 2022

Equipment Description/ Registration No.	SCC Number		Actual Emissions			Operating Schedule (Actual)					TOSD	Operating Schedule				Emissions
			Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End		Methods
1979 Keeler Boiler 4-0065		S	5.34	29.92						357 0						C3
		F														
Niro Dryer 8-0052		S	0.003	0.04						133						C2,C3
		F														
Cleaver-Brooks Gas MD122223		S	1.68	9.57						350						C3
		F														
Cleaver-Brooks #2 Oil MD122223		S	0.0001	4.14						0.04						C3
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
<b>Total</b>			7.02	43.67												

S-Stack Emissions

F-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of the source

TOSD- Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and Nox sources.

**Emission Estimation Method**

A1-U.S. EPA Reference Method

A2- Other Particulate Sampling Train

A3-Liquid Absorption Technique

A4-Solid Absorption Technique

A5-Freezing Out Technique

A-9Other, Specify

C1-User calculated based on source

test or other measurement

C2-User calculated based on material balance

using engineering knowledge of the process

C3-User calculated based on AP-42

C4-User calculated by best guess/engineering

Judgement

C5-User calculated based on a State or local

agency emission factor

C6-New construction, not operational

C7-Source closed, operation ceased

C8-Computer calculated based on standards

# CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

## FORM 2

Facility Name: Maryland & Virginia Milk Producers Facility ID# 027-00052 Pollutant: SOx Calendar Year: 2022

Equipment Description/ Registration No.	SCC Number		Actual Emissions			Operating Schedule (Actual)					TOSD	Operating Schedule				Emissions
			Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Methods	
1979 Keeler Boiler 4-0065		S	0.03	0.18						357					C3	
		F														
Niro Dryer 8-0052		S	0.02	0.31						133					C3	
		F														
Cleaver-Brooks Gas MD122223		S	0.03	0.18						350					C3	
		F														
Cleaver-Brooks #2 Oil MD122223		S	0	0.00						0.04					C3	
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														

S-Stack Emissions

F-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of the source

TOSD- Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and Nox sources.

### Emission Estimation Method

A1-U.S. EPA Reference Method

A2- Other Particulate Sampling Train

A3-Liquid Absorption Technique

A4-Solid Absorption Technique

A5-Freezing Out Technique

A-9Other, Specify

C1-User calculated based on source

test or other measurement

C2-User calculated based on material balance

using engineering knowledge of the process

C3-User calculated based on AP-42

C4-User calculated by best guess/engineering

Judgement

C5-User calculated based on a State or local

agency emission factor

C6-New construction, not operational

C7-Source closed, operation ceased

C8-Computer calculated based on standards



# FORM 2

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: Maryland & Virginia Milk Producers

Facility ID# 027-00052

Pollutant: CO

Calendar Year: 2022

Equipment Description/ Registration No.	SCC Number		Actual Emissions		Operating Schedule (Actual)						TOSD	Operating Schedule			Emissions Methods
			Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
1979 Keeler Boiler 4-0065		S	4.49	25.13						357					C3
		F													
Niro Dryer 8-0052		S	0.00	0.05						133					C2,C3
		F													
Cleaver-Brooks Gas MD122223		S	4.40	25.13						350					C3
		F													
Cleaver-Brooks #2 Oil MD122223		S	0	0.00						0.04					C3
		F													
		S													
		F													
		S													
		F													
		S													
		F													
		S													
		F													
		S													
		F													
Total			8.89	50.31											

S-Stack Emissions

F-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of the source

TOSD- Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and Nox sources.

### Emission Estimation Method

A1-U.S. EPA Reference Method

A2- Other Particulate Sampling Train

A3-Liquid Absorption Technique

A4-Solid Absorption Technique

A5-Freezing Out Technique

A-9Other, Specify

C1-User calculated based on source

test or other measurement

C2-User calculated based on material balance

using engineering knowledge of the process

C3-User calculated based on AP-42

C4-User calculated by best guess/engineering

Judgement

C5-User calculated based on a State or local

agency emission factor

C6-New construction, not operational

C7-Source closed, operation ceased

C8-Computer calculated based on standards

# CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

## FORM 2

Facility Name: Maryland & Virginia Milk Producers

Facility ID# 027-00052

Pollutant: VOC

Calendar Year: 2022

Equipment Description/ Registration No.	SCC Number		Actual Emissions		Operating Schedule (Actual)						TOSD	Operating Schedule				Emissions Methods
			Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End		
1979 Keeler Boiler 4-0065		S	0.29	1.65						357					C3	
		F														
Niro Dryer 8-0052		S	0.19	2.85						133					C3	
		F														
Cleaver-Brooks Gas MD122223		S	0.29	1.65						350					C3	
		F														
Cleaver-Brooks #2 Oil MD122223		S	0.00E+00	0.00												
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
		S														
		F														
Total			0.77	6.14												

S-Stack Emissions

F-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of the source

TOSD- Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and Nox sources.

### Emission Estimation Method

A1-U.S. EPA Reference Method

A2- Other Particulate Sampling Train

A3-Liquid Absorption Technique

A4-Solid Absorption Technique

A5-Freezing Out Technique

A-9Other, Specify

C1-User calculated based on source

test or other measurement

C2-User calculated based on material balance

using engineering knowledge of the process

C3-User calculated based on AP-42

C4-User calculated by best guess/engineering

Judgement

C5-User calculated based on a State or local

agency emission factor

C6-New construction, not operational

C7-Source closed, operation ceased

C8-Computer calculated based on standards

# CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

## FORM 2

Facility Name: Maryland & Virginia Milk Producers      Facility ID# 027-00052      Pollutant: Lead      Calendar Year: 2022

Equipment Description/ Registration No.	SCC Number		Actual Emissions		Operating Schedule (Actual)						TOSD	Operating Schedule			Emissions
			Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Methods
1979 Keeler Boiler 4-0065		S	0.00	0.00						357					C3
		F													
Niro Dryer 8-0052		S	0.00	0.00						133					C3
		F													
Cleaver-Brooks Gas MD122223		S	0.00	0.00						350					C3
		F													
Cleaver-Brooks #2 Oil MD122223		S	#####	0						0.04					C3
		F													
		S													
		F													
		S													
		F													
		S													
		F													
		S													
		F													
		S													
		F													
		S													
		F													
Total			0.000	0.00											

S-Stack Emissions      F-Fugitive Emissions      Daily emissions (lbs/day) are lbs/operating day of the source

TOSD- Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and Nox sources.

### Emission Estimation Method

A1-U.S. EPA Reference Method  
A2- Other Particulate Sampling Train  
A3-Liquid Absorption Technique  
A4-Solid Absorption Technique  
A5-Freezing Out Technique  
A-9Other, Specify

C1-User calculated based on source  
test or other measurement  
C2-User calculated based on material balance  
using engineering knowledge of the process  
C3-User calculated based on AP-42  
C4-User calculated by best guess/engineering  
Judgement

C5-User calculated based on a State or local  
agency emission factor  
C6-New construction, not operational  
C7-Source closed, operation ceased  
C8-Computer calculated based on standards

# FORM 3: PM

# EMISSIONS CERTIFICATION REPORT

## Particulate Matter

Calendar Year: 2022

Facility Name: Maryland & Virginia Milk Producers

Facility ID# 027-00052

Pollutant: PM

Equipment Description/ Registration No.	SCC Number	Fuel		PM - Filterable		PM 10 - Filterable		PM 2.5 - Filterable		PM - Condensable		Operation	Emissions Methods
				Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Days/yr	
.....													
.....													
1979 Keeler Boiler 4-0065			S	0.10	0.57	0.10	0.57	0.10	0.57	0.30	1.71		C3
.....			F									357.00	
.....													
.....													
Niro Dryer 8-0052			S	18.57	280.07	8.82	132.98	1.39	20.97	0.20	2.95		C2,C3
.....			F									132.58	
.....													
.....													
Cleaver-Brooks Gas MD122223			S	0.10	0.57	0.10	0.57	0.10	0.57	0.30	1.71		C3
.....			F									350.00	
Cleaver-Brooks #2 Oil MD122223			S										
.....			F	0	0	0	0	0	0.00	0	0.00	0.04	C3
.....			S										
.....			F										
.....			S										
.....			F										
.....			S										
.....			F										
.....			S										
.....			F										
.....			S										
.....			F										
<b>Total</b>				18.77	281.21	9.02	134.12	1.59	22.11	0.80	6.37		

S-Stack Emissions

F-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of the source

Fuel: Include emissions for each fuel used. If more than one fuel used, calculate and list emissions separately for each fuel.

### Emission Estimation Method

A1-U.S. EPA Reference Method

A2- Other Particulate Sampling Train

A3-Liquid Absorption Technique

A4-Solid Absorption Technique

A5-Freezing Out Technique

A-9Other, Specify

C1-User calculated based on source

test or other measurement

C2-User calculated based on material balance

using engineering knowledge of the process

C3-User calculated based on AP-42

C4-User calculated by best guess/engineering

Judgement

C5-User calculated based on a State or local

agency emission factor

C6-New construction, not operational

C7-Source closed, operation ceased

C8-Computer calculated based on standards

**FORM 4**

**TOXIC AIR POLLUTANTS  
EMISSIONS CERTIFICATION REPORT**

Calendar Year: 2022

Facility Name: Maryland & Virginia Milk Producers Facility ID# 027-00052 Pollutant: Cadmium

Equipment Description/ Registration Number * 1	Actual Emissions			Control Device**	% Efficiency
	Tons/yr	lbs/day	Lbs/hour		
1979 Keeler Boiler 4-0065	0.0001	0.0003	0.0000		
Niro Dryer 8-0052	0.0000	0.0006	0.0000		
Cleaver-Brooks Gas MD122223	0.0001	0.0003	0.0000		
Cleaver-Brooks #2 Oil MD122223	0.0000	0.0000	0.0000		
Totals	0.0002	0.0012	0.0001		

\* Please attach all calculations

\* See attachment 1 for the minimum reporting values

**\*\*Control Device**

S=Scrubber

B=Baghouse

ESP=Electrostatic Precipitator

A=Afterburner

C=Condenser

AD=Adsorption

O=Other

\*1 Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

**FORM 4****TOXIC AIR POLLUTANTS  
EMISSIONS CERTIFICATION REPORT**Calendar Year: 2022Facility Name: Maryland & Virginia Milk ProducersFacility ID#: 027-00052Pollutant: Formaldehyde

Equipment Description/ Registration Number * 1	Actual Emissions			Control Device**	% Efficiency
	Tons/yr	lbs/day	Lbs/hour		
1979 Keeler Boiler 4-0065	0.0040	0.0224	0.0009		
Niro Dryer 8-0052	0.0026	0.0389	0.0016		
Cleaver-Brooks Gas MD122223	0.0039	0.0224	0.0009		
Cleaver-Brooks #2 Oil MD122223	0.0000	0.0000	0.0000		
Totals	0.0105	0.0838	0.0035		

\* Please attach all calculations

\* See attachment 1 for the  
minimum reporting values**\*\*Control Device**

S=Scrubber

B=Baghouse

ESP=Electrostatic Precipitator

A=Afterburner

C=Condenser

AD=Adsorption

O=Other

\*1 Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

**FORM 5**

# BILLABLE TOXIC AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Calendar Year: 2022Facility Name: Maryland & Virginia Milk Producers Facility ID#: 027-0052

Chemical Name	CAS Number		Actual Emissions			Estimation Method	Emission Estimation Method
			Tons/year	Lbs/day	Lbs/hr		
carbon disulfide	75-15-0	S	*	*	*	C3	A1-U.S. EPA Reference Method
		F					A2- Other Particulate Sampling Train
carbonyl sulfide	463-58-1	S	*	*	*	C3	A3-Liquid Absorption Technique
		F					A4-Solid Absorption Technique
chlorine	7782-50-5	S	*	*	*	C3	A5-Freezing Out Technique
		F					A-9Other, Specify
cyanide compounds	57-12-5	S	*	*	*	C3	
		F					
hydrochloric acid	7647-01-0	S	*	*	*	C3	C1-User calculated based on source test or other measurement
		F					
hydrogen fluoride	7664-39-3	S	*	*	*	C3	C2-User calculated based on material balance using engineering knowledge of the process
		F					
methyl chloroform	71-55-6	S	*	*	*	C3	C3-User calculated based on AP-42
		F					C4-User calculated by best guess/engineering Judgement
methylene chloride	75-09-2	S	*	*	*	C3	C5-User calculated based on a State or local agency emission factor
		F					
perchloroethylene	127-18-4	S	*	*	*	C3	C6-New construction, not operational
		F					C7-Source closed, operation ceased
phosphine	7803-51-2	S	*	*	*	C3	C8-Computer calculated based on standards
		F					
titanium tetrachloride	7550-45-0	S	*	*	*	C3	This form to include only the eleven chemicals identified.
		F					
Totals			*	*	*		

S-Stack Emissions

F-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of the source

PLEASE NOTE: Be sure to attach all data and calculations necessary to support the emissions figures shown above.

See attachment 1 for minimum reporting values.

# GREENHOUSE GAS AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Calendar Year: 2022Facility Name: Maryland & Virginia Milk ProducersFacility ID#: 027-00052Pollutant: nitrous oxide \*

Equipment Description/ Registration Number * 1	Actual Emissions		
	Tons/yr	lbs/day	Lbs/hour
1979 Keeler Boiler 4-0065	0.03	0.16	0.01
Niro Dryer 8-0052	0.04	0.33	0.01
Cleaver-Brooks Gas MD122223	0.03	0.16	0.01
Cleaver-Brooks #2 Oil MD122223	1.91E-05	0.04	0.002
Totals	0.09	0.69	0.03

This form must be used to report  
Greenhouse gas emissions:

- \* carbon dioxide (CO<sub>2</sub>)
- \* methane (CH<sub>4</sub>)
- \* nitrous oxide (N<sub>2</sub>O)
- \* hydrofluorocarbons (HFCs)
- \* perfluorocarbons (PFCs)
- \* sulfur hexafluoride (SF<sub>6</sub>)

\* Use separate form for each pollutant.

\* Please attach all calculations.

\*1 Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)



**FORM 6: Greenhouse Gases****GREENHOUSE GAS AIR POLLUTANTS  
EMISSIONS CERTIFICATION REPORT**Calendar Year: 2022Facility Name: Maryland & Virginia Milk ProducersFacility ID#: 027-00052Pollutant: methane \*

Equipment Description/ Registration Number * 1	Actual Emissions		
	Tons/yr	lbs/day	Lbs/hour
1979 Keeler Boiler 4-0065	0.12	0.69	0.03
Niro Dryer 8-0052	0.08	1.19	0.05
Cleaver-Brooks Gas MD122223	0.12	0.69	0.03
Cleaver-Brooks #2 Oil MD122223	0.000	0.000	0.000
Totals	0.32	2.57	0.11

This form must be used to report  
Greenhouse gas emissions:

- \* carbon dioxide (CO<sub>2</sub>)
- \* methane (CH<sub>4</sub>)
- \* nitrous oxide (N<sub>2</sub>O)
- \* hydrofluorocarbons (HFCs)
- \* perfluorocarbons (PFCs)
- \* sulfur hexafluoride (SF<sub>6</sub>)

\* Use separate form for each pollutant.

\* Please attach all calculations.

\*1 Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

**FORM 6: Greenhouse Gases****GREENHOUSE GAS AIR POLLUTANTS  
EMISSIONS CERTIFICATION REPORT**Calendar Year: 2022Facility Name: Maryland & Virginia Milk ProducersFacility ID#: 027-00052Pollutant: carbon dioxide

\*

Equipment Description/ Registration Number * 1	Actual Emissions		
	Tons/yr	lbs/day	Lbs/hour
1979 Keeler Boiler 4-0065	6408.39	35901.34	1495.89
Niro Dryer 8-0052	4123.87	62208.00	2592.00
Cleaver-Brooks Gas MD122223	6282.73	35901.34	1495.89
Cleaver-Brooks #2 Oil MD122223	0	0	0
Totals		16814.99	134010.67
			5583.78

This form must be used to report  
Greenhouse gas emissions:

- \* carbon dioxide (CO2)
- \* methane (CH4)
- \* nitrous oxide (N2O)
- \* hydrofluorocarbons (HFCs)
- \* perfluorocarbons (PFCs)
- \* sulfur hexafluoride (SF6)

\* Use separate form for each pollutant.

\* Please attach all calculations.

\*1 Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

## Oil Purchases

Maryland Virginia Milk Producers  
Facility ID# 027-00052

## 2022 Oil Purchases

[illegible]

Totals	0
--------	---

Facility ID Maryland and Virginia Milk 027-00052

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	
1979 Keeler Boiler	4-0065	S	NG	2.51E-01	1.40E+00		4.56E+00	2.55E+01		2.74E-02	1.53E-01	3.83E+00	2.14E+01	2.28E-05	1.27E-04	C3
Niro Dryer	8-0052	S	NG	3.53E-01	2.85E+00		5.13E-03	4.15E-02		3.85E-02	3.11E-01	6.41E-03	5.18E-02	3.20E-05	2.59E-04	C3
Cleaver Brooks Boiler gas	MD122223	S	NG	2.42E-01	1.40E+00		1.41E+00	8.15E+00		2.64E-02	1.53E-01	3.69E+00	2.14E+01	2.20E-05	1.27E-04	C3
Cleaver Brooks Boiler #2 oil	MD122223	S	No 2	8.71E-06	7.60E-02		1.00E-04	4.14E+00		1.88E-05	1.64E-01	2.18E-04	1.90E+00	2.39E-07	4.79E-04	C3
	#															
	#															
	#															
	#															
	#															
	#															
Total Emissions				1.25E+01	4.95E+01	0.00E+00	#REF!	#REF!	0.00E+00	9.22E-02	7.81E-01	7.53E+00	4.47E+01	7.71E-05	9.93E-04	

**PARTICULATE MATTER  
EMISSIONS CERTIFICATION REPORT**

Facility ID

Maryland and  
Virginia Milk  
Producers

027-00052

**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	
1979 Keeler Boiler	4-0065	S	NG	8.66E-02	4.84E-01	8.66E-02	4.84E-01	8.66E-02	4.84E-01	2.60E-01	1.45E+00	C3
Niro Dryer	8-0052	S	NG	3.46E+01	2.80E+02	1.64E+01	1.33E+02	2.59E+00	2.10E+01	3.65E-01	2.95E+00	C3
Cleaver Brooks Boiler gas	MD122223	S	NG	8.35E-02	4.84E-01	8.35E-02	4.84E-01	8.35E-02	4.84E-01	2.51E-01	1.45E+00	C3
Cleaver Brooks Boiler #2 oil	MD122223	S	No 2	8.71E-05	7.60E-01	4.35E-05	3.80E-01	1.09E-05	1.58E-02	5.66E-05	4.94E-01	C3
	#											
	#											
	#											
	#											
	#											
	#											
<b>Total Emissions</b>				3.48E+01	2.82E+02	1.66E+01	1.34E+02	2.76E+00	2.20E+01	8.76E-01	6.35E+00	

REPORTABLE TOXIC AIR POLLUTANTS  
EMISSIONS CERTIFICATION REPORT

Facility ID

Maryland and Virginia Milk 027-00052

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			
1979 Keeler Boiler	4-0065	S	NG	Cadmium	7440-43-9	5.01E-05	2.80E-04	1.17E-05	NA	NA	C3
				Formaldehyde	50-00-0	3.42E-03	1.91E-02	7.96E-04	NA	NA	C3
Niro Dryer	8-0052	S	NG	Cadmium	7440-43-9	7.05E-05	5.70E-04	2.38E-05	NA	NA	C3
				Formaldehyde	50-00-0	4.81E-03	3.89E-02	1.62E-03	NA	NA	C3
Cleaver Brooks Boiler	MD122223	S	NG	Cadmium	7440-43-9	4.84E-05	2.80E-04	1.17E-05	NA	NA	C3
				Formaldehyde	50-00-0	3.30E-03	1.91E-02	7.96E-04	NA	NA	C3
Cleaver Brooks Boiler	MD122223	S	No 2	Cadmium	7440-43-9	0.0000	0.0002	0.0002	NA	NA	C3
				Formaldehyde	50-00-0	1.44E-06	1.25E-02	5.23E-04	NA	NA	C3

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

**BILLABLE TOXIC AIR POLLUTANTS  
EMISSIONS CERTIFICATION REPORT**

Facility ID

Maryland and  
Virginia Milk  
Producers

027-00052

**Billable TAPs**

Pollutant

Chemical Name	CAS Number	Actual Emissions			Estimation Method
		tons/yr	lbs/day	lbs/hr	
carbon disulfide	75-15-0	0.00E+00	0.00E+00	0.00E+00	C3
carbonyl sulfide	463-58-1	0.00E+00	0.00E+00	0.00E+00	C3
chlorine	7782-50-5	0.00E+00	0.00E+00	0.00E+00	C3
cyanide compounds	57-12-5	0.00E+00	0.00E+00	0.00E+00	C3
hydrochloric acid	7647-01-0	0.00E+00	0.00E+00	0.00E+00	C3
hydrogen fluoride	7664-39-3	0.00E+00	0.00E+00	0.00E+00	C3
methyl chloroform	71-55-6	0.00E+00	0.00E+00	0.00E+00	C3
methylene chloride	75-09-2	0.00E+00	0.00E+00	0.00E+00	C3
perchloroethylene	127-18-4	0.00E+00	0.00E+00	0.00E+00	C3
phosphine	7803-51-2	0.00E+00	0.00E+00	0.00E+00	C3
titanium tetrachloride	7550-45-0	0.00E+00	0.00E+00	0.00E+00	C3

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

Pollutant

Equipment Name	Registration No.	S / F	Fuel Type	CO <sub>2</sub>		CH <sub>4</sub>		N <sub>2</sub> O		HFCs		PFCs		SF <sub>6</sub>		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	
1979 Keeler Boiler	4-0065	S	NG	5.47E+03	3.06E+04	1.05E-01	5.86E-01	2.59E-02	1.61E-01							C3
Niro Dryer	8-0052	S	NG	7.69E+03	6.22E+04	1.47E-01	1.19E+00	3.82E-02	3.32E-01							C3
Cleaver Brooks Boiler gas	MD122223	S	NG	5.28E+03	3.06E+04	1.01E-01	5.86E-01	2.73E-02	1.61E-01							C3
Cleaver Brooks Boiler #2 oil	MD122223	S	NG	4.33E+00	8.66E+03	2.26E-06	1.98E-02	1.91E-05	3.83E-02							C3
	#															
	#															
	#															
	#															
	#															
	#															
Total Emissions				1.50E+05	1.32E+05	3.53E-01	2.38E+00	#REF!	#REF!	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	



**From:** [Michele White](#)  
**To:** [Dave Dat -MDE-](#)  
**Subject:** 2022 ECR - MDVA - Laurel  
**Date:** Friday, March 31, 2023 6:46:00 PM  
**Attachments:** [2022 ECR - MDVA Laurel.pdf](#)

---

Mr. Dat,

Please find attached ECR for 2022 for the Maryland & Virginia Milk Producers Laurel facility.

2 copies are being submitted to your attention.

Regards,  
Michele White  
Compliance Partners, Inc.  
402 E. Avenue G  
Midlothian, TX 76065  
972-723-9509 (office)  
214-564-8622 (cell)  
[michele.white@cpi-tx.com](mailto:michele.white@cpi-tx.com)