

## AIR AND RADIATION ADMINISTRATION DRAFT PART 70 OPERATING PERMIT

## **DOCKET # 24-03-0317**

**COMPANY**: National Security Agency

**LOCATION**: 9800 Savage Road

Fort George G. Meade, Maryland, 21863

## **CONTENTS:**

- 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 National Security Agency (NSA), located in Anne Arundel County, MD. The facility consists of paint spray booths, natural gas fired boilers, diesel fired emergency generators, charbroilers, and one vehicle refinishing equipment.

The applicant is represented by:

Ms. Samantha Schutt, Environmental Engineer
National Security Agency
9800 Savage Road, Suite 6218
Fort George G. Meade, MD 20755

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
- 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 <a href="mailto:Shannon.heafey@maryland.gov">Shannon.heafey@maryland.gov</a> 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.

### **BACKGROUND**

The National Security Agency (NSA) facility is located at Fort George G. Meade in Anne Arundel County, Maryland. The NSA campus at Fort Meade encompasses a wide range of administrative and manufacturing operations. Process operations include a plating operation, several paint spray booths, and a paper pulp operation for the destruction of classified paper products. Fuel burning equipment consisting of boilers and emergency generators are located throughout the facility. The primary SIC for this facility is 9711. Sources associated with SIC 3672 and 3674 were not included in this permit.

The following table summarizes the actual emissions from National Security Agency based on its 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	23.32	0.58	0.82	9.82	3.23	0.15
2022	19.82	0.55	1.77	12.78	3.31	0.08
2021	33.51	0.84	4.25	39.60	8.40	0.22
2020	31.27	1.53	2.12	5.88	2.04	0.13
2019	30	3.3	0.93	6.63	2.7	0.3

The major source threshold for triggering Title V permitting requirements in Anne Arundel County is 25 tons per year for VOC, 25 tons for NO $_{\rm X}$ , and 100 tons per year for any other criteria pollutants and 10 tons for a single HAP or 25 tons per year for total HAPS. Since the actual NO $_{\rm X}$  emission from the facility are greater than the major source threshold, NSA is required to obtain a Title V – Part 70 Operating Permit under COMAR 26.11.03.01.

The Department on January 30, 2024 received NSA's Part 70 renewal permit application. An administrative completeness review was conducted and the application was deemed to be administratively complete. A completeness determination letter was sent to NSA on March 18, 2024 granting NSA an application shield.

#### CHANGES AND MODIFICATIONS TO THE PART 70 OPERATING PERMIT

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

### **Equipment Removed**

Four (4) Hydrotherm KN-20 natural gas boilers each rated at 1.5 million Btu/hr heat input (Permit No. 003-0317-5-0725 thru 5-0728)

One (1) Detroit Model 8V92TA diesel fuel emergency generator rated at 643 brake horsepower (Permit No. 003-0317-9-0807)

One (1) Katolight Model D900X6T2 diesel fuel emergency generator rated at 415 kW (Permit No. 003-0317-9-0968)

One (1) Magickitch'n natural gas fired charbroiler (Permit No. 003-0317-8-0155)

## **Additions: Permit to Construct issued:**

### **Emergency Generators**

One (1) Cummins diesel fired emergency generator rated at 800 kW (Permit No. 003-0317-9-1243). Permit to Construct issued March 2022.

One (1) Cummins diesel fired emergency generator rated at 600 kW (Permit No. 003-0317-9-1244). Permit to Construct issued March 2022.

One (1) MTU diesel fired emergency generator set rated at 750 kW (Permit No. 003-0317-9-1266). Permit to Construct issued February 2025.

#### **Boilers:**

Two (2) Hydrotherm KN20 natural gas fired boilers, each rated at 1.99 million Btu/hr heat input (Permit No. 003-0317-5-0891 and 0892). Permit to Construct issued December 2019.

Two (2) Hydrotherm KN20 natural gas fired boilers, each rated at 1.9 million Btu/hr hear input (Permit No. 003-0317-5-0900). Permit to Construct issued September 2020.

Four (4) Patterson Kelly natural gas fired boilers, each rated at 4.0 million Btu/hr heat input (Permit No. 003-0317-5-0905). Permit to Construct issued February 2021.

Three (3) Lochnivar natural gas fired boilers, each rated at 1.5 million Btu/hr heat input (Permit No. 003-0317-5-0911). Permit to Construct issued November 2021. Three (3) Patterson Kelly natural gas fired boilers, each rated at 2.0 million Btu/hr heat input (Permit No. 003-0317-5-0915). Permit to Construct issued July 2024. Three (3) Fulton natural gas fired boilers, each rated at 6.0 million Btu/hr heat input (Permit No. 003-0317-5-0916). Permit to Construct issued January 2025.

#### **MACT and NSPS**

NSA is a minor source of HAPs and is subject to the following area source MACT standards (40 CFR Part 63):

- 1. Subpart JJJJJJ—National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers Area Sources.
- 2. Subpart ZZZZ—National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines.
- 3. Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

NSA is subject to the following New Source Performance Standards (NSPS) (40 CFR Part 60),

1. Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

NSA is also subject to the NO<sub>X</sub> Reasonably Available Control Technology (RACT) requirements.

### **Compliance Assurance Monitoring (CAM) Requirement.**

NSA conducted a Compliance Assurance Monitoring (CAM) analysis for the facility and determined that the facility is not subject to the (CAM) Rule 40 CFR Subpart 64.

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

The Plating Shop (Permit No.6-0375) is the only source that is potentially subject to the CAM rule. During analysis, it was determined that the plating shop does

not have the uncontrolled potential to emit any criteria pollutant, HAP or aggregate of all HAPs that would exceed the relevant major source threshold.

#### **GREENHOUSE GAS (GHG) EMISSIONS**

NSA emits the following greenhouse gases (GHGs) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHGs originate from various processes (i.e., internal combustion engines, and boilers) contained within the facility premises applicable to NSA. The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements. While there may be no applicable requirements as a result of PSD, emission certifications reports for the years 2021, 2022 and 2023, showed that NSA is not a major source (threshold: 100,000tpy  $CO_2e$ ) for GHG's (see Table 3 shown below). The Permittee shall quantify facility wide GHGs emissions and report them in accordance with Section 3 of the Part 70 permit.

The following table summarizes the actual emissions from NSA based on its Annual Emission Certification Reports:

Table 3: Greenhouse Gases Emissions Summary

GHG	Conversion factor	<b>2023</b> tpy CO <sub>2</sub> e	<b>2022</b> tpy CO <sub>2</sub> e	<b>2021</b> tpy CO <sub>2</sub> e
Carbon dioxide CO <sub>2</sub>	1	16,014.11	14,593.2	18,179.24
Methane CH <sub>4</sub>	25	1.8	2.82	7.71
Nitrous Oxide N <sub>2</sub> O	298	14.06	16.02	24.28
Total GHG CO <sub>2eq</sub>		16,029.97	14,612.04	18,211.23

## **EMISSION UNIT IDENTIFICATION**

National Security Agency has identified the following emission units as being subject to Title V permitting requirements and having applicable requirements.

**Table 2: Emission Unit Identification** 

Emissions Unit Number	MDE - ARA Registratio n Number	Emissions Unit Name and Description	Date of Installation
Boilers > 10 MMBtu/hr	5-0502 thru 5-0504	Three (3) Union Iron Works natural gas/No. 2 fuel oil fired boilers each rated at 85 million Btu per hour.	January 1953
	5-0505	One (1) Keeler natural gas/No. 2 fuel oil fired boilers each rated at 90 million Btu per hour.	December 1969
Boilers <= 10 MMBtu/hr	5-0644 and 5-0645	Two (2) Lochinvar Power Fin natural gas boilers, each rated at 1.5 million Btu per hour heat input	August 2006
	5-0809	Four (4) Lochinvar natural gas fired boilers, each rated at 1.5 million Btu per hour heat input	September 2015
	5-0810	Four (4) Harsco natural gas fired boilers, each rated at 2.5 million Btu per hour	September 2015
	5-0811	Two (2) Harsco natural gas fired boilers each rated at 2.0 million Btu per hour	September 2015
	5-0823	Three (3) Lochinvar Crest Model FBN- 1501 natural gas fired boilers, each rated at 1.5 million Btu per hour heat input	September 2015
	5-0842	Four (4) Lochinvar natural gas fired boilers, each rated at 4.0 million Btu per hour heat input	November 2016
	5-0891 and 5-0892	Two (2) Hydrotherm KN20 natural gas fired boilers, each rated at 1.99 million Btu per hour heat input	December 2019
	5-0900	Two (2) Hydrotherm KN20 natural gas fired boilers, each rated at 1.99 million Btu per hour heat input	September 2020
	5-0905	Four (4) Patterson Kelly natural gas fired boilers, each rated at 4.0 million Btu per hour heat input	February 2021

Emissions Unit Number	MDE - ARA Registratio n Number	Emissions Unit Name and Description	Date of Installation
5-0911		Three (3) Lochnivar natural gas fired boilers, each rated at 1.5 million Btu per hour heat input	November 2021
	5-0915 Three (3) Patterson Kelly natural gas fired boilers, each rated at 2.0 million Btu per hour heat input		July 2024
	5-0916	Three (3) Fulton natural gas fired boilers, each rated at 6.0 million Btu per hour heat input	January 2025
Emergency Generators	9-0804	One (1) Detroit Model 12N-4002 U-12 diesel fuel emergency generator rated at 600 kW	September 1994
	9-0806	One (1) Katolight Model V-1271 diesel fuel emergency generator rated at 560 kW	September 1997
	9-0818 thru 9-0823	Six (6) Cummins/Onan diesel fuel emergency generator sets each rated at 2700 kW (Standby)	March 2005
	9-0918	One (1) Katolight (Model D900X6T2) diesel fuel emergency generator rated at 900 kW	March 2008
	9-0967	One (1) Katolight (Model 415-J6T3) diesel fuel emergency generator rated at 415 kW.	September 2009
	9-1035	Eighteen (18) Cummins diesel emergency generators each rated at 2,750 kW and each equipped with SCR system	April 2012
	9-1055	Twenty-four (24) Caterpillar diesel emergency generators each rated at 2,725 kW and each equipped with SCR system	January 2015
	9-1090	MTU Onsite Energy diesel-fired emergency generator rated at 2,280 kW located in Building 9800C.	2014
	9-1091	Seven (7) Caterpillar C175-16 diesel fired emergency generator sets, each rated at 3000 kW and equipped with selective catalytic reduction	2014
	9-1092	One (1) Caterpillar C32 diesel fired emergency generator set rated at 1000 kW	2014

Emissions Unit Number	MDE - ARA Registratio n Number	Emissions Unit Name and Description	Date of Installation
	9-1116	Six (6) Caterpillar C175-16 emergency diesel generators each rated at 3000 kW (standby) and each equipped with an E- POD Selective Catalytic Reduction (SCR) system.	September 2015
	9-1117	Two (2) Caterpillar C15 life safety emergency diesel generator each rated at 500 kW (stand-by).	September 2015
	9-1136	One (1) Caterpillar C175-16 emergency diesel generator rated at 3000 kW and equipped with an E-POD Selective Catalytic Reduction (SCR) system.	November 2016
	9-1137	One (1) Caterpillar C 13 life safety emergency generator rated at 400 kW (Standby)	November 2016
	9-1146	One (1) Kohler emergency diesel-fired generator rated at 550 kW.	August 2017
	9-1155	Fourteen (14) Caterpillar diesel fired emergency generator sets, each rated at 3000-kW and equipped with Selective Catalytic Reduction (SCR) systems to control NO <sub>X</sub> emissions.	March 2018
	9-1156	One (1)Caterpillar diesel fired emergency generator set rated at 800 kW life safety emergency diesel generator set	January 2018
	9-1243	One (1) Cummins diesel fired emergency generator set rated at 800 kW	March 2022
	9-1244	One (1) Cummins diesel fired emergency generator set rated at 600 kW	March 2022
	9-1266	One (MTU) diesel fired emergency generator set rated at 750 kW	February 2025
9-0449 and 9-0450	9-0449 and 9-0450	Paper Pulp Operation consisting of an automatic material collection system and a separate continuous operating system controlled by baghouses.	March 1978
6-0375	6-0375	Plating Operation consisting of surface coating of steel or aluminum parts to add	June 1992

Emissions Unit Number	MDE - ARA Registratio n Number	Emissions Unit Name and Description	Date of Installation
		durability and extend service life, controlled by a packed bed scrubber emission control system.	
6-1114	6-1114	One (1) Future Cure Model 1000 paint spray booth for miscellaneous metal coating.	January 2002
6-1095	6-1095	One (1) Vehicle refinishing Equipment	August 2006
8-0340	8-0340	One (1) Radiant charbroiler	May 2018
8-0363	8-0363	Four (4) Garland Radiant natural gas charbroilers	November 2021

### AN OVERVIEW OF THE PART 70 PERMIT

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

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

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

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

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

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

Section VI of the Part 70 Permit contains State-only enforceable requirements. Section VI identifies requirements that are not based on the Clean Air Act, but solely on Maryland air pollution regulations. These requirements generally relate

to the prevention of nuisances and implementation of Maryland's Air Toxics Program.

## REGULATORY REVIEW/TECHNICAL REVIEW/COMPLIANCE METHODOLOGY

Emission Unit: Boilers > 10 MMBtu/hr

5-0502 thru 5-0504 – Three Union Works natural gas/No. 2 fuel oil fired boilers each rated at 85 million Btu/hr heat input.

5-0505 – One Keeler natural gas/No. 2 fuel oil fired boiler rated at 90 million Btu/hr heat input.

These boilers are <u>not</u> subject to the NSPS requirements of Subpart Dc since they were installed prior to the applicability of June 9, 1989. The applicability requirement states "...the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h)." [Reference: §60.40c]

These boilers <u>are</u> subject to the NESHAP requirements for area source boiler MACT Subpart JJJJJJ.

#### Compliance Status

Results of the October 2023 compliance inspection:

Boilers #4 was operating at 41% fuel flow. The operators confirmed this is typical operation for the season. Method 9 visible emission observation was conducted on Boiler #4, no visible emissions were observed.

Combustion analysis was performed on Boiler 1 for gas and oil on 03/17/23, Boiler 3 combustion analysis for gas was conducted on 02/10/23 and oil on 02/14/2023. Boiler 4 gas combustion analysis was conducted on 02/10/23. Boiler 2 combustion analysis took place on 01/14/2022. Oil combustion analysis on Boiler 4 and testing of Boiler 2 were pending at the time of the inspection. Records of  $NO_X$  reduction training was conducted on 09/02/21 and 10/20/21. Fuel sulfur certificate showed 15 ppm ultra low sulfur fuel. O and M plan maintained in MAXIMO computer maintenance system.

### **Applicable Standards and limits**

A. Control of Visible Emissions

COMAR 26.11.09.05A – Fuel Burning Equipment

- "(2) Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.
- (3) <u>Exceptions</u>. Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:
- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period."

#### **Compliance Demonstration**

The Permittee shall:

- (1) Properly operate and maintain the boilers in a manner to prevent visible emissions; and
- (2) Verify no visible emissions when burning No. 2 fuel oil. The Permittee shall perform a visual observation for a 6-minute period once for each 168 hours that the boiler burns oil or at a minimum of once per year.

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

- (1) Inspect combustion control 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 the inspections, adjustments and/or repairs to the boiler; and
- (4) After 48 hours, if the required adjustments and/or repairs had not eliminated the visible emissions, perform Method 9 observations once daily for 18 minutes until corrective actions have eliminated the visible emissions.

The Permittee shall:

- (1) Maintain an operation manual and prevention maintenance plan on site;
- (2) Maintain a record of the maintenance preformed that relates to combustion performance;
- (3) Maintain a log of visible emissions observations performed and make it available to the Department's representative upon request;
- (4) Maintain a record of the hours that No. 2 fuel oil is burned.

[Reference: COMAR 26.11.03.06C].

The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations".

<u>Rationale for Periodic Monitoring</u> - Boilers that burn Natural Gas fuel with No. 2 Fuel Oil as backup with a rated heat input capacity of more than 10 MM Btu/hr

and less than 250 MM Btu/hr rarely have visible emissions if properly operated and maintained. The Permittee is required to maintain on site an operations manual, a preventative maintenance plan, and records of maintenance performed that relate to combustion performance.

If visible emissions occur, it will happen when burning No. 2 fuel oil. No. 2 fuel oil is burned only as a backup fuel. The Permittee is required to perform a visual observation of the exhaust gases from the boiler stack for a 6-minute period, once each 168 hours that fuel oil is burned. In mild winters, the hours of interrupted gas service may be less than 168 hours. At a minimum, one observation for visible emissions is required each year. The Permittee is required to maintain a record of the results of the observations and number of hours that No. 2 fuel oil is burned.

\_\_\_\_

#### B. Control of Sulfur Oxides

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

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

### Compliance Demonstration

The Permittee shall obtain a certification from the fuel supplier indicating that the oil complies with the limitation on the sulfur content of the fuel oil. The Permittee shall maintain records of fuel supplier's certification and shall make records available to the Department upon request. [Reference: COMAR 26.11.03.06C]. The Permittee shall report fuel supplier certification to the Department upon request [Reference: COMAR 26.11.09.07C].

<u>Rationale for Periodic Monitoring</u>: The strategy for the compliance demonstration is based on the compliance demonstration for NSPS Subpart Dc boilers that burn fuel oil.

\_\_\_\_\_

## C. Control of Nitrogen Oxides

COMAR 26.11.09.08B(5) - Operator Training.

- a) For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.
- b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department."

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

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

- (1) Submit to the Department an identification of each affected installation, the rated heat input capacity of each installation, and the type of fuel burned in each;
- (2) Perform a combustion analysis for each installation at least once each year and optimize combustion based on the analysis;
- (3) Maintain the results of the combustion analysis at the site for at least 2 years and make this data available to the Department and the EPA upon request;
- (4) Once every 3 years, require each operator of the installation to attend operator training programs on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and
- (5) Prepare and maintain a record of training program attendance for each operator at the site, and make these records available to the Department upon request."

## **Compliance Demonstration**

The Permittee shall perform a combustion analysis once a year. The Permittee shall optimize combustion based on the annual combustion analysis.

[Reference: COMAR 26.11.09.08E(2)]

The Permittee shall maintain:

- (1) The Permittee shall maintain records of the results of the annual combustion analysis on site. [Reference: COMAR 26.11.09.08E(5)].
- (2) Record of training program attendance for each operator at the site.

[Reference: COMAR 26.11.09.08E(5)].

The Permittee shall submit:

- (1) The results of combustion analysis to the department and the EPA upon request. [Reference: COMAR 26.11.09.08E(3)]
- (2) A record of training program attendance for each operator to the Department upon request. [Reference: COMAR 26.11.09.08E(5)].

### D. Operational Limits

The Permittee shall only burn natural gas with No. 2 fuel oil as back up fuel unless the Permittee applies for and receives an approval or permit from the Department to burn alternate fuels. [Reference: COMAR 26.11.02.09A].

## **Compliance Demonstration**

The Permittee shall maintain records of the quantity and types of fuel burned.

[Reference: COMAR 26.11.02.19C(1)(c)]

The Permittee shall submit records of the quantity and type of fuels burn with the annual emissions certification report. See permit condition 8 of Section III.

### Emission Unit: Boilers > 10 MMBtu/hr Cont'd

5-0502 thru 5-0504 – Three Union Works natural gas/No. 2 fuel oil fired boilers each rated at 85 million Btu/hr heat input.

5-0505 – One Keeler natural gas/No. 2 fuel oil fired boiler rated at 90 million Btu/hr heat input.

#### Compliance Status

Results of the October 2023 compliance inspection:

Tune-ups were conducted in 2023. The one-time energy assessment required by the MACT was conducted in 2011. The facility submits ACOMP reports by April 1<sup>st</sup> each year certifying compliance or reporting deviations for any permit condition.

### Applicable Standards and limits

Control of HAPs:

40 CFR Part 63, Subpart JJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

### §63.11193 - Am I subject to this subpart?

You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

## §63.11196 - What are my compliance dates?

- (a) If you own or operate an existing affected boiler, you must achieve compliance with the applicable provisions in this subpart as specified in paragraphs (a)(1) through (3) of this section.
- (1) If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management practice standard no later than March 21, 2014.
- (2) If the existing affected boiler is subject to emission limits, you must achieve compliance with the emission limits no later than March 21, 2014.
- (3) If the existing affected boiler is subject to the energy assessment requirement, you must achieve compliance with the energy assessment requirement no later than March 21, 2014.

### §63.11201 - What standards must I meet?

- (a) You must comply with each emission limit specified in Table 1 to this subpart that applies to your boiler.
- (b) You must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that

applies to your boiler. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 to this subpart satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement.

- (c) You must comply with each operating limit specified in Table 3 to this subpart that applies to your boiler.
- (d) These standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in §63.11237, during which time you must comply only with Table 2 to this subpart.

## Table 2 to Subpart JJJJJJ of Part 63—Work Practice Standards, Emission Reduction Measures, and Management Practices

As stated in §63.11201, you must comply with the following applicable work practice standards, emission reduction measures, and management practices:

If your boiler is in this subcategory	You must meet the following
4. Existing oil-fired boilers with heat input capacity <b>greater than 5 MMBtu/hr</b> that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223. (Tune ups were conducted in 2016, 2017 and 2018)
16. Existing coal-fired, biomass-fired, or oil-fired boilers (units with heat input capacity of 10 MMBtu/hr and greater), not including limited-use boilers	Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items (1) to (4)

appropriate for the on-site technical hours listed in §63.11237: (Energy assessment conducted in 2011)
(1) A visual inspection of the boiler system,
(2) An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints,
(3) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator,
(4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
(5) A list of major energy conservation measures that are within the facility's control,
(6) A list of the energy savings potential of the energy conservation measures identified, and
(7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

## **Compliance Demonstration**

**§63.11223** - How do I demonstrate continuous compliance with the work practice and management practice standards?

"(a) For affected sources subject to the work practice standard or the management practices of a tune-up, you must conduct a performance tune-up according to paragraph (b) of this section and keep records as required in §63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely

burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up."

- "(b) Except as specified in paragraphs (c) through (f) of this section, you must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (b)(1) through (7) of this section. Each **biennial** tune-up must be conducted no more than 25 months after the previous tune-up. For a new or reconstructed boiler, the first biennial tune-up must be no later than 25 months after the initial startup of the new or reconstructed boiler.
- (1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.
- (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.
- (4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- (5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- (6) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of this section.
- (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
- (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
- (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- (7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup."

The Permittee must operate and maintain, at all times, any affected source, including air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [Reference: 40 CFR §63.11205(a)]

## **§63.11225** - What are my notification, reporting, and recordkeeping requirements?

- "(a) You must submit the notifications specified in paragraphs (a)(1) through (5) of this section to the administrator.
- (1) You must submit all of the notifications in §§63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to you by the dates specified in those sections except as specified in paragraphs (a)(2) and (4) of this section.
- (2) An Initial Notification must be submitted no later than January 20, 2014 or within 120 days after the source becomes subject to the standard.
- (3) If you are required to conduct a performance stack test you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance stack test is scheduled to begin.
- (4) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in §63.11196 unless you must conduct a performance stack test. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official.
- (i) You must submit the information required in §63.9(h)(2), except the information listed in §63.9(h)(2)(i)(B), (D), (E), and (F). If you conduct any performance tests or CMS performance evaluations, you must submit that data as specified in paragraph (e) of this section. If you conduct any opacity or visible emission observations, or other monitoring procedures or methods, you must submit that data to the Administrator at the appropriate address listed in §63.13.
- (ii) "This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler."
- (iii) "This facility has had an energy assessment performed according to §63.11214(c)."
- (iv) For units that install bag leak detection systems: "This facility complies with the requirements in §63.11224(f)."
- (v) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

- (vi) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in §63.13.
- (5) If you are using data from a previously conducted emission test to serve as documentation of conformance with the emission standards and operating limits of this subpart, you must include in the Notification of Compliance Status the date of the test and a summary of the results, not a complete test report, relative to this subpart.
- (b) You must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of this section. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section. For boilers that are subject only to a requirement to conduct a biennial or 5-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this section.
- (1) Company name and address.
- (2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
- (i) "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."
- (ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
- (iii) "This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."
- (3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- (4) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination

by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure.

- (c) You must maintain the records specified in paragraphs (c)(1) through (7) of this section.
- (1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.
- (2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified in paragraphs (c)(2)(i) through (vi) of this section.
- (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
- (ii) Not Applicable.
- (iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.
- (iv) For each boiler subject to an emission limit in Table 1 to this subpart, you must also keep records of monthly fuel use by each boiler, including the type(s) of fuel and amount(s) used.
- (v) For each boiler that meets the definition of seasonal boiler, you must keep records of days of operation per year.
- (vi) For each boiler that meets the definition of limited-use boiler, you must keep a copy of the federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent and records of fuel use for the days the boiler is operating.
- (3) For sources that demonstrate compliance through fuel analysis, a copy of all calculations and supporting documentation that were done to demonstrate compliance with the mercury emission limits. Supporting documentation should include results of any fuel analyses. You can use the results from one fuel analysis for multiple boilers provided they are all burning the same fuel type.
- (4) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
- (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- (6) You must keep the records of all inspection and monitoring data required by §§63.11221 and 63.11222, and the information identified in paragraphs (c)(6)(i) through (vi) of this section for each required inspection or monitoring.
- (i) The date, place, and time of the monitoring event.

- (ii) Person conducting the monitoring.
- (iii) Technique or method used.
- (iv) Operating conditions during the activity.
- (v) Results, including the date, time, and duration of the period from the time the monitoring indicated a problem to the time that monitoring indicated proper operation.
- (vi) Maintenance or corrective action taken (if applicable).
- (7) Not Applicable.
- (d) Your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years."

## Emission Unit: Boilers < 10 MMBtu/hr

5-0644 and 5-0645 – Two (2) Lochinvar Power Fin (Model PB1500M9) natural gas-fired boilers each rated at 1.5 million Btu/hr heat input.

5-0809 - Four (4) Lochinvar natural gas fired boilers, each rated at 1.5 million Btu per hour heat input

5-0810 - Four (4) Harsco natural gas fired boilers, each rated at 2.5 million Btuper hour

5-0811 - Two (2) Harsco natural gas fired boilers, each rated at 2.0 million Btu per hour

5-0823 - Three (3) Lochinvar Crest Model FBN-1501 natural gas fired boilers, each rated at 1.5 million Btu per hour heat input

5-0842 - Four (4) Lochinvar natural gas fired boilers, each rated at 4.0 million Btu per hour heat input.

5-0905 - Four (4) Patterson Kelly natural gas fired boilers, each rated at 4.0 million Btu per hour heat input.

5-0911 - Three (3) Lochnivar natural gas fired boilers, each rated at 1.5 million Btu per hour heat input.

5-0900 - Two (2) Hydrotherm KN20 natural gas fired boilers, each rated at 1.9 million Btu per hour heat input.

5-0891 and 0892 - Two (2) Hydrotherm KN20 natural gas fired boilers, each rated at 1.5 million Btu per hour heat input.

5-0915 – Three (3) Patterson Kelly natural gas fired boilers, each rated at 2.0 million Btu per hour heat input.

5-0916 – Three (3) Fulton natural gas fired boilers, each rated at 6.0 million Btu per hour heat input.

NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR Part 63, Subpart JJJJJJ. Gas-fired boilers as defined in this Subpart are not subject to this subpart and to any requirements in this subpart. [40 CFR §63.11195(e)]

"Gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year." [40 CFR §63.11237]

### Compliance Status

Results of October 2023 compliance inspection:

Preventive Maintenance is planned and tracked in MAXIMO computer system which creates and records work orders for required maintenance tasks. NO<sub>X</sub> reduction training conducted in 2021.

### **Applicable Standards and limits**

A. Control of Visible Emissions

#### COMAR 26.11.09.05A - Fuel Burning Equipment

- "(2) Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.
- (3) Exceptions. Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:
- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period."

### **Compliance Demonstration**

No periodic monitoring for opacity is required.

The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations".

_	O 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
2	('antrol at Nitragan ()vid	00
)	COHIOLOLANICOCELL CAIO	ES
J.	Control of Nitrogen Oxid	<b>5</b> 3

COMAR 26.11.09.08B(5) - Operator Training.

- (a) For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.
- (b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department."

### **COMAR 26.11.09.08F** - Requirements for Space Heaters.

- "(1) A person who owns or operates a space heater<sup>1</sup> as defined in Regulation .01B of this chapter shall:
  - (a) Submit to the Department a list of each affected installation on the premises and the types of fuel used in each installation;
  - (b) Develop an operating and maintenance plan to minimize NO<sub>x</sub> emissions based on the recommendations of equipment vendors and other information including the source's operating and maintenance experience;
  - (c) Implement the operating and maintenance plan and maintain the plan at the premises for review upon request by the Department;
  - (d) Require installation operators to attend in-State operator training programs once every 3 years on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and
  - (e) 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.
- (2) A person who owns or operates an installation that no longer qualifies as a space heater shall inform the Department not later than 60 days after the date when the fuel-burning equipment did not qualify, and shall meet the applicable fuel-burning equipment RACT requirement in this regulation."

"Space heater" means fuel-burning equipment that consumes more than 60 percent of its annual fuel during the period from October 31 of one year through March 31 of the following year. For the purpose of this regulation, annual fuel use is the total fuel consumed during the period October 1 of one year to September 30 of the following year, beginning October 1, 1989.

### **Compliance Demonstration**

The Permittee shall develop and maintain an operating and maintenance plan to minimize NO<sub>X</sub> emissions. [Reference: COMAR 26.11.09.08F(1)(b)].

The Permittee shall maintain:

- 1) Records of maintenance performed that relates to combustion performance in keeping with the requirements of an operations and maintenance plan. [Reference: COMAR 26.11.09.08F(1)(c)].
- 2) Record of training program attendance for each operator. [Reference: COMAR 26.11.09.08F(1)(e)].
- 3) An operations manual and preventive maintenance plan. [Reference: COMAR 26.11.09.08F(1)(b)].

 Records of fuel use that demonstrate that the boiler meets the definition of a space heater. [Reference: COMAR 26.11.09.08K(3) and COMAR 26.11.03.06C].

The Permittee shall submit: a record of training program attendance for each operator to the Department upon request. [Reference: COMAR 26.11.09.08F(1)(e)]

### C. Operational Limits

The Permittee shall only burn natural gas unless the Permittee applies for and receives an approval or permit from the Department to burn an alternate fuel. [Reference: COMAR 26.11.02.09A].

## **Compliance Demonstration**

The Permittee shall maintain records of the quantity and types of fuel burned. [Reference: COMAR 26.11.02.19C(1)(c)].

The Permittee shall submit records of the quantity and type of fuels burn with the annual emissions certification report. See permit condition 8 of Section III.

### **Emission Unit: Emergency Generators**

9-0804 – One (1) Detroit (Model 12N-4992 U-12) diesel fuel emergency generator rated at 600 kW.

9-0806 – One (1) Katolight (Model V-1271) diesel fuel emergency generator rated at 560 kW.

9-0818 thru 9-0823 – Six (6) Cummins/Onan diesel fuel emergency generator sets each rated at 2700 kW (Standby)

9-0918 – One (1) Katolight (D900X6T2) diesel fuel emergency generator set rated 900 kW.

9-0967– One (1) Katolight (Model 415-J6T30 emergency diesel generator rated at 415 kW.

9-1035 – One (1) group of eighteen (18) Cummins diesel emergency generators each rated at 2,750 kW and each equipped with SCR system

9-1055 - One (1) group of twenty-four (24) Caterpillar diesel emergency generators each rated at 2,725 kW and each equipped with SCR system.

9-1090 - One (1) MTU Onsite Energy diesel-fired emergency generator.

9-1091 - Seven (7) Caterpillar C175-16 diesel fired emergency generator sets, each rated at 3000 kW and equipped with selective catalytic reduction.

9-1092 - One (1) Caterpillar C32 diesel fired emergency generator set rated at 1000 kW.

- 9-1116 Six (6) Caterpillar C175-16 emergency diesel generators each rated at 3000 kW (standby) and each equipped with an E-POD Selective Catalytic Reduction (SCR) system.
- 9-1117 Two (2) Caterpillar C15 life safety emergency diesel generator each rated at 500 kW (stand-by).
- 9-1136 One (1) Caterpillar C175-16 emergency diesel generator rated at 3000 kW and equipped with an E-POD Selective Catalytic Reduction (SCR) system. 9-1137 One (1) Caterpillar C 13 life safety emergency generator rated at 400-kW (Standby).
- 9-1146 One (1) Kohler emergency diesel-fired generator rated at 550 kW.
- 9-1155 Fourteen (14) Caterpillar diesel fired emergency generator sets, each rated at 3000 kW and equipped with Selective Catalytic Reduction (SCR) systems to control  $NO_X$  emissions.
- 9-1156 One (1) 800 kW life safety emergency diesel generator set.
- 9-1243 One (1) Cummins diesel fired emergency generator set rated at 800 kW.
- 9-1244 One (1) Cummins diesel fired emergency generator set rated at 600 kW.
- 9-1266 One (1) MTU diesel fired emergency generator set rated at 750 kW.

#### Compliance Status

Results of October 2023 compliance inspection:

No emergency generators were operating due to lack of demand for emergency power. In 2021 one engine (9-1146) operated over 500 hours and a combustion analysis was conducted as required. Monthly logs of operating hours and fuel usage are kept on site. Operator training was conducted in 2021. Maintenance records are kept in a database. Engine oil is changed every other year and oil analysis and filter changes are conducted in years without oil changes. Engine hoses and belts are inspected frequently. Coolant is changed every 6 years. Batteries are checked frequently and replaced as a group as necessary. Selective catalytic reduction lances are cleaned using an ammonia solution. Fuel is pumped to a polishing system to keep it clean and engines are tested regularly under load using a load bank on site.

- **9-1116**: On April 20, 2018  $NO_X$  stack testing was conducted on one of the six 3000-kW emergency engines installed. Results show compliance with the permit limit for potential to emit is 1.66 tons below 25 tons of  $NO_X$  at 100 hours of operation. Engines are equipped with SCR and were operated at >90% load via use of load bank during the test.
- **9-1091**: On December 21, 2015 results of the  $NO_X$  stack test were received. Results indicate potential to emit from all seven engines operating at 100 hr/year is 1.48 tons well below the 25 tons permitting threshold. NOX emission rate is 4.00 lb/hr from each engine with a post control concentration of 56.49 ppm. Engines are each rated 2725-kW and operated at 2730-kW during the test. Urea flow during the test is reported at 38.99 liter/hr.

**9-1055**: On April 29, 2015 stack test was conducted on one 2725-kW CAT emergency North Campus Utility generator equipped with SCR. Results of the test confirm the SCR achieved 91.9%  $NO_X$  reduction which is greater than the 90% minimum required by the permit. Engines are certified Tier 2. An average urea injection rate of 33.30 liters/hr was recorded during testing.

## **Applicable Standards and limits**

A. Control of Visible Emissions

**COMAR 26.11.09.05E** - <u>Stationary Internal Combustion Engine Powered</u> Equipment.

- "(2) Emissions During Idle Mode. A person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (3) Emissions During Operating Mode. A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (4) Exceptions.
- (a) Section E(2) of this regulation does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
- (b) Section E(2) of this regulation does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:
- (i) Engines that are idled continuously when not in service: 30 minutes:
- (ii) All other engines: 15 minutes.
- (c) Section E(2) and (3) of this regulation do not apply while maintenance, repair, or testing is being performed by qualified mechanics."

### Compliance Demonstration

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

The Permittee shall retain records of preventive maintenance on site for at least five years and make these records available to the Department upon request.

[Reference: COMAR 26.11.03.06C]

The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, Plant Wide Condition, "Report of Excess Emissions and Deviations"

#### B. Control of Sulfur Oxides

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

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

### **Compliance Demonstration**

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

The Permittee shall retain annual fuel supplier certifications stating that the fuel oil is in compliance with this regulation must be maintained for at least 5 years. [Reference: COMAR 26.11.09.07C].

The Permittee shall report annual fuel supplier certification to the Department upon request. [Reference: COMAR 26.11.09.07C].

#### C. Control of Nitrogen Oxides

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

- (1) A person who owns or operates fuel-burning equipment with a capacity factor (as defined in 40 CFR Part 72.2) of 15 percent or less shall:
  - (a) Provide certification of the capacity factor of the equipment to the Department in writing;
  - (b) For fuel-burning equipment that operates more than 500 hours during a calendar year, perform a combustion analysis and optimize combustion at least once annually;
  - (c) Maintain the results of the combustion analysis at the site for at least 2 years and make these results available to the Department and the EPA upon request;
  - (d) Require each operator of an installation, except combustion turbines, to attend operator training programs at least once every 3 years, on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and
  - (e) Maintain a record of training program attendance for each operator at the site, and make these records available to the Department upon request.

#### **Compliance Demonstration**

The Permittee shall perform a combustion analysis and optimize combustion at least once annually for any of the engines that operates more than 500 hours during a calendar year. [Reference: COMAR 26.11.09.08G(1)(b)].

For engines that operate more than 500 hours during a calendar year, the Permittee shall perform a combustion analysis and optimize combustion. **[Reference: COMAR 26.11.03.06C]**.

The Permittee shall maintain records of the results of the combustion analyses on site for at least five years and make them available to the Department and EPA upon request. [Reference: COMAR 26.11.09.08G(1)(c) & COMAR 26.11.03.06C]. The Permittee shall maintain a record of the calculated capacity factor. [Reference: COMAR 26.11.09.08G(1)(c)]. The Permittee shall maintain record of training program attendance for each operator on site for at least five years and make the records available to the Department upon request.

[Reference: COMAR 26.11.09.08G(e) & COMAR 26.11.03.06C].

The Permittee shall provide certification of the capacity factor of the equipment to the Department in writing as part of the April 1 certification report. [Reference: COMAR 26.11.03.06C]. The Permittee shall submit a list of trained operators to the Department upon request. [Reference: COMAR 26.11.09.08G(e) and COMAR 26.11.03.06C].

D. Operational Limits:

Each of the six (6) Cummins/Onan emergency generator sets shall not operate more than 125 hours a year, unless the source obtains a prior approval from the Department. [Reference: MDE PTC Registration No. 9-0818 thru 9-0823, Condition D2]

### **Compliance Demonstration**

The Permittee shall log the number of hours each generator is operated on a monthly basis for generator preventive maintenance. [Reference: COMAR 26.11.03.06C]

The Permittee shall maintain records of hours of Preventative Maintenance testing operation, utility provider-requested operation and emergency operation and fuel usage on a daily basis and maintain on site for at least five (5) years. [Reference: MDE Registration No. 9-0818 thru 9-0823, Condition E1] The Permittee shall report to the Department records of hours of operation, fuel used and emission estimates for each emergency generator with the annual Emissions Certification Report[Reference: MDE Registration No. 9-0818 thru 9-0823, Condition E1].

## **Emission Unit: Emergency Generators Cont'd**

9-0918 – One (1) Katolight (D900X6T2) diesel fuel emergency generator set rated 900 kW.

9-0967 – One (1) Katolight (Model 415-J6T30 emergency diesel generator rated at 415 kW.

9-0993 thru 9-0998 – Six (6) Caterpillar Model 3516C diesel emergency generators each rated at 2 MW and equipped with E-POD SCR system 9-1035 – One (1) group of eighteen (18) Cummins diesel emergency generators each rated at 2.75 MW and each equipped with SCR system

9-1055 - One (1) group of twenty-four (24) Caterpillar diesel emergency generators each rated at 2.725 MW and each equipped with SCR system.

9-1090 - One (1) MTU Onsite Energy diesel-fired emergency generator.

9-1091 - Seven (7) Caterpillar C175-16 diesel fired emergency generator sets, each rated at 3000 kW (3988 bhp) and equipped with selective catalytic reduction.

9-1092 - One (1) Caterpillar C32 diesel fired emergency generator set rated at 1000 kW (1474 bhp).

9-1116 - Six (6) Caterpillar C175-16 emergency diesel generators each rated at 3000 kW (standby) and each equipped with an E-POD Selective Catalytic Reduction (SCR) system..

9-1117 - Two (2) Caterpillar C15 life safety emergency diesel generator each rated at 500 kW (stand-by).

9-1136 - One (1) Caterpillar C175-16 emergency diesel generator rated at 3000-KW and equipped with an E-POD Selective Catalytic.

9-1137 - One (1) Caterpillar C 13 life safety emergency generator rated at 400-kW (Standby)

9-1146 - One (1) Kohler emergency diesel-fired generator rated at 550-kW.

9-1155 - Fourteen (14) Caterpillar diesel fired emergency generator sets, each rated at 3000-kW and equipped with Selective Catalytic Reduction (SCR) systems to control NO<sub>X</sub> emissions.

9-1156 - One (1) 800-kW life safety emergency diesel generator set.

9-1243 – One (1) Cummins diesel fired emergency generator set rated at 800 kW.

9-1244 – One (1) Cummins diesel fired emergency generator set rated at 600 kW.

9-1266 – One (1) MTU diesel fired emergency generator set rated at 750 kW.

## **Applicable Standards and limits**

A. New Source Performance Standards (**NSPS**) under 40 CFR Part 60 Subpart IIII for Stationary Compression Ignition Internal Combustion Engines.

Note: Beginning October 1, 2010, installations subject to 40 CFR Part 60, Subpart IIII must comply with the diesel fuel standards of §60.4207 which limit the maximum sulfur content of the fuel to 15 ppm.

(1) This permit is valid only for the installation of an emergency diesel generator with piston displacement less than 10 liters per cylinder.

- (2) The provisions of 40 CFR Part 60, Subpart IIII apply if the emergency diesel generator uses a diesel engine manufactured after April 1, 2006 [Ref: §60.4200].
- (3) An emergency diesel generator or diesel engine subject to the requirements of 40 CFR 60, Subpart IIII ("NSPS emergency diesel generator" or "NSPS emergency diesel engine") shall be equipped with a non-resettable hour meter [Ref: §60.4209(a)].
- (4) The Permittee shall only purchase emergency generator sets certified to meet the emission standards of §60.4205(b). The generators must be installed and configured according to the manufacturer's specifications.[Ref: §60.4211(c)]
- (5) The Permittee must purchase and install emergency generator sets certified to the emission standards for new nonroad diesel engines in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants [Ref: §62.4202(b)(2)];
- (6) The requirements of condition (5) above do not apply to owners or operators of NSPS emergency diesel engines that have been modified, reconstructed, and do not apply to engines that were removed from one existing location and reinstalled at a new location [Ref: §60.4208].

#### **Compliance Demonstration**

- (1) The Permittee shall maintain a log for the emergency generator indicating the amounts of fuel oil combusted, the hours of operation, and reason for generator operation (i.e., maintenance or operational testing, power outage, etc.). [Reference: COMAR 26.11.03.06C]
- (2) The Permittee shall maintain on site for the life of the source the following records for the emergency diesel generator(s):
  - (a) Documentation of the manufacture date of the diesel engine, if manufactured prior to April 1, 2006 and the manufacturer model year of the diesel engine;
  - (b) The installation date of each emergency diesel generator; and
  - (c) The certifications of compliance or manufacturer engine test data required by 40 CFR §60.4211 and §60.4214(b).
- (3) Beginning October 1, 2007, for any NSPS emergency diesel generator the Permittee shall for each fuel delivery obtain from the fuel supplier a fuel supplier certification consisting of the name of the oil supplier, the date of delivery, the amount of fuel delivered, and a statement from the fuel

supplier that the diesel fuel oil complies with the specifications of 40 CFR §80.510. The Permittee shall maintain the required records on site for at least five (5) years.

B. National Emissions Standards for Hazardous Air Pollutants (NESHAP) promulgated under 40 CFR 63, Subparts A and ZZZZ for Reciprocating Internal Combustion Engines "§63.6590 – What parts of my plant does this subpart cover? This subpart applies to each affected source.
© Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs ©(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines

(1) A new or reconstructed stationary RICE located at an area source."

### **Compliance Demonstration**

See NSPS Requirements.

C. Operational Limits

under this part.

- (1) The Permittee must operate and maintain an NSPS emergency diesel generator and control devices according to the manufacturer's written instructions or according to procedures developed by the owner or operator that are approved by the manufacturer. Additionally the Permittee may change only those settings that are permitted by the manufacturer. The Permittee must also meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they may apply to an owner or operator [Ref: §60.4211].
- (2) The Permittee must meet the non-road diesel fuel sulfur requirements of 40 CFR §80.510(b) as follows:
  - (a) Maximum sulfur content 15 ppm and
  - (b) Minimum cetane index of 40: or
  - (c) Maximum aromatic content of 35 volume percent.

[Ref: 40 CFR §60.4207(b) and §80.510(b)]

<u>Note:</u> Compliance with this requirement demonstrates compliance with COMAR 26.11.09.07A(2)(b) which limits the sulfur content of diesel fuel (No. 2 fuel oil) to 0.3 percent by weight.

- (3) The Permittee must comply with the following emissions standards for the emergency generator set:
  - (a) Non-methane Hydrocarbons and  $NO_X$  (NMHC+NO<sub>X</sub>): 6.4 grams per kilowatt-hour (g/kW-hr)
  - (b) Carbon Monoxide (CO): 3.5 g/kW-hr
  - (c) Particulate Matter (PM): 0.2 g/kW-hr

[Ref: §60.4205(b), §60.4202(b)(2), and §89.112]

Please Note: Limits met by purchasing certified engines.

- (4) The exhaust opacity from the emergency generator shall not exceed:
  - (a) 20 percent during the acceleration mode;
  - (b) 15 percent during the lugging mode; and
  - (c) 50 percent during the peaks in either the acceleration or lugging modes.

[Ref: 40 CFR §60.4205(b), §60.4202(b)(2), and §89.113]

- (5) The Permittee must use diesel fuel in the emergency generator set that meets the requirements of 40 CFR §80.510(b) (diesel fuel that has a pergallon sulfur content that does not exceed 15 ppm, and that either has a minimum per-gallon cetane index of 40 or a maximum per-gallon aromatic content of 35 volume percent), unless a waiver is obtained from the Department and/or the EPA Administrator. [Ref: §60.4207].
- (6) In accordance with 40 CFR §60.4211(f), non-emergency use of the emergency diesel generator set for the purpose of maintenance checks and readiness testing is limited to 100 hours per year or less unless prior approval is received from the Department.

### **Compliance Demonstration**

The Permittee shall report the amounts of fuel oil combusted, the hours of operation, and reason for generator operation (i.e., maintenance or operational testing, power outage, etc.) to the Department in the annual emission certification report due on April 1 of each year. [Reference: COMAR 26.11.03.06C]

#### **Emission Unit: Emergency Generators Cont'd**

Emergency generators <u>not subject</u> to NSPS Subpart IIII Requirements, but are subject to 40 CFR Part 63, Subpart ZZZZ.

9-0804: One (1) Detroit Model 12N-4002 U-12 diesel fuel emergency generator rated at 600 kW

9-0805: One (1) Caterpillar Model 3406 diesel fuel emergency generator rated at 587 brake horsepower.

9-0806: One (1) Katolight Model V-1271 diesel fuel emergency generator rated at 750 brake horsepower

9-0818 thru 9-0823: Six (6) Cummins/Onan diesel fuel emergency generator sets each rated at 2700 kW (Standby)

### **Applicable Standards and limits**

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

(a) Affected sources. (1)" ..... If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. .....".

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

Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this subpart.

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

## Table 2d to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

As stated in §§63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

For each	You must meet the following requirement, except during periods of startup	During periods of startup you must
RICE and black start	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; <sup>1</sup>	
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and	

c. Inspect all hoses and belts every 500 hours of operation or annually, whichever	
comes first, and replace as necessary.	

<sup>&</sup>lt;sup>1</sup>Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.

<sup>2</sup>If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

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

- "(a) You must be in compliance with the emission limitations and operating limitations in this subpart that apply to you at all times.
- (b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source."

### **Compliance Demonstration**

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

- "(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:
- (3) An **existing emergency** or black start stationary RICE located at an area source of HAP emissions."
- "(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP

emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed."

- "(h) If you operate a new, reconstructed, or **existing stationary engine**, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.
- (i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation. whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine."

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

- (a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.
- (b) You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. If you change your

catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.

### <u>Table 6</u> to Subpart ZZZZ of Part 63—Continuous Compliance With Emission Limitations, and Other Requirements

As stated in §63.6640, you must continuously comply with the emissions and operating limitations

and work or management practices as required by the following:

For each	Complying with the requirement to	You must demonstrate continuous compliance by
	a. Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

<sup>&</sup>quot;(f) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)

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

- (1) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).
- (i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- (4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity."

### **§63.6655** - What records must I keep?

- "(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE; (2) An existing stationary emergency RICE.
- (3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart."

- "(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) through (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.
- (2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines."

"If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable." [Footnote 2 of Table 2d]

### **Emission Unit: 9-0449 and 9-0450**

**9-0449 and 9-0450** – Paper Pulp Operation consisting of an automatic material collection system and a separate continuous operating system controlled by a baghouses.

#### Compliance Status

Results of October 2023 compliance inspection:

The paper pulp operation was not operating. Records of monthly and annual operation are provided with ECR. Records of 1-minute monthly VE observation were provided and maintained on site. The baghouse was observed.

### **Applicable Standards and limits**

A. Control of Visible Emissions

COMAR 26.11.06.02C(2) – <u>Visible Emission Standards</u>. "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." <u>Exceptions</u>. **COMAR 26.11.06.02A(2).** "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment if:

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

### **Compliance Demonstration**

The Permittee shall conduct a monthly 1-minute visual observation of the baghouse exhaust. The visual observation must be conducted while the pulp paper operation and baghouse are in operation. If no visible emissions are observed in six consecutive monthly observations from the baghouse exhaust, the Permittee may decrease the frequency of visual observations from monthly to quarterly for the baghouse exhaust. If visible emissions are observed during any guarter visual observation, the Permittee must resume the observation of the baghouse exhaust on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly visual observations. If visible emissions are observed during any observation, the Permittee must inspect baghouse for cause of visible emission and perform necessary adjustments or repairs within 24-hours or prior to operating the pulp paper operation. If visible emissions have not been eliminated, the Permittee shall perform daily 18-minute visual observation for opacity in accordance with EPA Reference Method 9 when operating the pulp paper operation. The Permittee shall maintain on site a log of the dates and results of visible emissions observations for a period of at least 5 years. [Reference: COMAR 26.11.03.06C]

The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, Plant Wide Condition, "Report of Excess Emissions and Deviations"

#### B. Control of Particulate Matter Emissions

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

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

#### C. Operational Limits:

The Permittee shall record the annual quantity of material processed by the automatic material collection system and separate continuous operating system and shall maintain these records for at least 5 years. [Reference: MDE Permit Condition 5of Permit No. 02-9-0449 & 0450]

### **Compliance Demonstration**

The Permittee shall record the annual quantity of material processed by the paper pulp operation and shall maintain these records on site for at least 2 years. The Permittee shall make records available to the Department upon request and submit records with annual Emission Certification Report. [Reference: COMAR 26.11.03.06C].

#### Emission Unit: 6-0375

**6-0375** – Plating Operation consisting of surface coating of steel or aluminum parts to add durability and extend service life, controlled by a packed bed scrubber emission control system.

### Compliance Status

Results of October 2023 compliance inspection:

Records of filter changes from the plating hoods were provided.

### **Applicable Standards and limits**

A. Control of Visible Emissions

**COMAR 26.11.06.02C(2)** – Visible Emission Standards. "A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers." Exceptions. **COMAR 26.11.06.02A(2).** "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: The visible emissions are not greater than 40 percent opacity; and The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

### **Compliance Demonstration**

See Particulate Matter Requirements.

### B. Control of Particulate Matter Emissions

**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 perform preventive maintenance once per month or as recommended by the equipment manufacturer on scrubbers that control emissions units. The Permittee shall maintain a log of the maintenance performed on the scrubbers. The log shall be kept on site for at least five years and make available to the Department upon request. [Reference: COMAR 26.11.03.06C]

### **Emission Unit: 6-1114**

6-1114 – One (1) Future Cure Model 1000 paint spray booth for miscellaneous metal coating located in the Model Shop of the SPC building.

#### Compliance Status

Results of October 2023 compliance inspection:

Records of paint usage logs were provided. Paint used met the VOC specs and guns were HVLP. VOC emissions are included with the ECR.

### **Applicable Standards and limits**

Control of VOC Emissions

COMAR 26.11.19.08C. Applicability and Exemptions.

- "(1) This regulation applies to a person who owns or operates:
- (a) A metal furniture coating installation; or
- (b) A metal parts and products coating operation at a premises where the total VOC emissions from all metal parts and products surface coating operations (including emissions from related cleaning activities), exceed 15 pounds (6.8 kilograms) per day."

### D. Emission Standards.

"(1) A person subject to this regulation may not exceed the applicable VOC emission standards (expressed in terms of mass of VOC per volume of coating excluding water and exempt compounds, as applied) of the following table when applying a metal furniture coating:

Coating Type	Baked		Air-Dried	
Coating Type	Lbs/gal	Kg/I	Lbs/gal	Kg/l
General, one-component	2.3	0.275	2.3	0.275
General, multi-component	2.3	0.275	2.8	0.340
Extreme performance	3.0	0.360	3.5	0.420
Metallic	3.5	0.420	3.5	0.420
Pretreatment	3.5	0.420	3.5	0.420
Solar absorbent	3.0	0.360	3.5	0.420
Extreme high gloss	3.0	0.360	2.8	0.340

(2) A person subject to this regulation may not exceed the applicable VOC emission standards (expressed in terms of mass of VOC per volume of coating excluding water and exempt compounds, as applied) of the following table when applying a metal parts and products coating:

Coating Type	Baked		Air-Dried	
Coating Type		Kg/l	Lbs/gal	Kg/I
General, one-component	2.3	0.275	2.8	0.340
General, multi-component	2.3	0.275	2.8	0.340
Adhesion promoter	4.0	0.479	4.0	0.479
Prefabricated architectural one component and multi-component	2.3	0.280	3.5	0.420
Military specification	2.3	0.280	2.8	0.340
Extreme high-gloss; extreme performance; heat-resistant; high performance architectural; repair coating; solar absorbent; or touch up coating	3.0	0.360	3.5	0.420
Camouflage, electric-insulating varnish; etching filler; high temperature; metallic; mold-seal; pan backing; pretreatment; silicone release and vacuum-metalizing	3.5	0.420	2.8	0.420

#### E. Application Methods.

- (1) Except as provided in §E(2) of this regulation, a person subject to the requirements of this regulation shall use the following application methods:
- (a) Electrostatic application;

- (b) HVLP spray;
- (c) Flow coat;
- (d) Roller coat;
- (e) Dip coat including electrodeposition;
- (f) Brush coat; or
- (g) A coating application method capable of achieving a transfer efficiency equivalent to or better than the efficiency achieved by HVLP spraying."

### **Compliance Demonstration**

The Permittee shall check safety data sheet (SDS) to ensure that the VOC content of metal coatings is less than the applicable standard. The SDS shall contain VOC data that is based on EPA Method 24 or equivalent. If non-compliant coatings are used, the Permittee shall maintain sufficient records to demonstrate that the emissions on that day were less than 20 pounds.

### [Reference: COMAR 26.11.03.06C].

The Permittee shall maintain monthly records of the hours of spray booth operation, cleaning, and material usage on site for at least five (5) years and make available to the Department upon request. [Reference: MDE Permit

Number 033-6-1114 N issued July 11, 2007]

The Permittee shall report material usage to the Department annually in the Emission Certification Report. [Reference: COMAR 26.11.03.06C]

#### **Emission Unit: 6-1095**

6-1095 – Vehicle Refinishing Equipment.

#### Compliance Status

Results of October 2023 compliance inspection:

Per the Permittee, the vehicle spray booth was not being used for painting at present.

#### Applicable Standards and limits

Control of VOC Emissions

[Reference: MDE General Permit to Construct 003-6-1095 issued August 28, 2006]

<u>Applicability</u>: This general permit applies only to autobody repair facilities that: (1) are at a fixed stationary location; (2) Use not more than 400 gallons of vehicle refinishing material per year; (3) Have two or less paint spray booths; and (4) Do not use materials containing: (a) lead; (b) formaldehyde; or (c) pot life extenders.

#### Operating Requirements

- (1) All spray painting shall be conducted exclusively by personnel who are trained and certified as painters. Existing shops (in operation before September 17, 2007) have until January 10, 2011 to comply with this requirement.
- (2) The following painting operations can be performed by non-certified painters: (a) Painting with brushes, rollers, markers or other non-atomizing applications; (b) spray painting from non-refillable hand-held aerosol containers; or (c) spray painting from guns with a paint cup size 3 oz or less.
- (3) All spray painting shall be conducted in a spray booth or preparation station.
- (4) All spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment shall be fully enclosed having four complete walls or side curtains and a full roof. Existing shops (in operation before September 17, 2007) have until January 10, 2011 to comply with this requirement.
- (5) All spray booths and preparation stations used to coat miscellaneous parts and products or vehicles subassemblies shall have at least three complete walls or side curtains and a full roof. Existing shops (in operation before September 17, 2007) have until January 10, 2011 to comply with this requirement.
- (6) All mobile enclosures used to perform spot repairs must enclose and, if necessary seal against the surface around the area being painted in order to ensure that paint overspray is retained within the enclosure.
- (7) All spray booths, preparation stations and mobile enclosures shall be equipped with an exhaust gas filter having at least 98% capture efficiency during all times of use. Waterwash spray booths and preparation stations that are operated and maintained according to the manufacturer's specification are exempt from this requirement.
- (8) All spray booths and preparation stations shall be ventilated through the exhaust gas filter at a negative pressure. Fully enclosed and sealed spray booths equipped with an automatic pressure balancing system may be operated at up to, but not more than 0.05 inches water gauge positive pressure.
- (9) All spray applied coatings shall be applied by HVLP spray guns, electrostatic application, airless spray guns, air-assisted airless spray guns, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed, and for which written approval has been obtained from the Administrator.
- (10) Any paint stripping preformed with a chemical paint stripper containing Methylene Chloride (MeCl) requires the following practices: (a) An evaluation of the application to determine if paint stripping is necessary; (b) An evaluation of the application to determine if another paint stripping alternative could be used; (c) Minimization of air exposure by the chemical paint stripper;

(d) Optimization of application conditions; and (e) The proper storage and disposal of the chemical paint stripper.

(11) VOC content of materials used shall not exceed the following limitations:

Coatings*		VOC (lbs/gal)
Pretreatmen	t	6.5
Precoat		5.5
Primer Surfa	cer	4.8
Primer Seale	er	4.6
Topcoat		5.0
Multi-stage o	oating system	5.2
Specialty coa	ating	7.0
<u>Preparation</u>	<u>materials</u>	
Non-plastic		1.4
Plastic		6.5

<sup>\*</sup> VOC content limitation is for coating as applied.

- (12) Use of specialty coatings may not exceed five percent by volume of all coatings on a monthly basis.
- (13) The Permittee shall perform the following good operating practices and equipment cleanup procedures to reduce VOC emissions: (a) Establish good operating practices in writing; (b) Make the written operating practices available to the Department upon request; (c) Display the good operating practices so that they are clearly visible to the operator, or include them in operator training; (d) Provide training for equipment operators on the practices, procedures, and maintenance requirements that are consistent with equipment manufacturer's recommendations and the Permittee's experience in operating the equipment; (e) Minimize material or color changes when applying VOC coatings, whenever practical; (f) Mix or blend VOC materials in closed containers to reduce VOC emissions, as practical; (g) Maintain lids on all VOC containers when not in use; (h) Store VOC contaminated materials in closed containers; (i) Promptly contain and clean p spills and leaks of materials containing VOC; (j) Use enclosed spray gun cleaning, VOCrecycling systems and other spray gun cleaning methods; and Use detergents, high-pressure water, or other non-VOC cleaning options to clean lines, containers and equipment, where practical.

#### **Training Requirements**

(1) All personnel, including contract personnel, who spray coatings must be trained and certified no later than 180 days after hiring. Existing shops (in operation before September 17, 2007) have until January 10, 2011 to train and certify painters.

- (2) Training and certification is valid for a period not to exceed five years after the date of training is completed.
- (3) All personnel who spray coatings must receive refresher training and be recertified every five years
- (4) The training program shall at a minimum include the following:
  - (a) A list of all personnel by name and job description who are required to be trained;
  - (b) Hand on and classroom instructions on:
    - (i) Spray gun equipment selection, setup, and operation, including measuring coating viscosity, selecting the proper fluid tip or muzzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate;
    - (ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap and reducing lead and lag spraying at the beginning and end of stroke;
    - (iii) Routine spray booth and filter maintenance, including filter selection and installation: and
    - (iv) Environmental compliance with the federal MACT requirements of 40 CFR part 63, subpart HHHHHH; and
  - (c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document and provide certification of successful completion of the required training.
- (5) The initial training required by this section is not required if the Permittee can show by documentation or certification that a painter's work experience and/or training has resulted in training has resulted in training required in section 4(b) above.

### **Compliance Demonstration**

The Permittee shall check MSDS to ensure that the VOC content of coatings is less than the applicable standard. The MSDS shall contain VOC data that is based on EPA Method 24 testing or equivalent. [Reference: COMAR 26.11.03.06C].

### Recordkeeping

The following records must be kept for at least 5 years after the date of each record: (a) certification that each painter has completed the required training, with the date of the initial training and the most recent refresher training was

completed; (b) documentation of the filter efficiency of any spray booth exhaust filter material; (c) for spray guns that are not HVLP spray guns, electrostatic application, airless spray guns, or air-assisted air less spray guns, documentation from the manufacturer that the gun achieves equivalent transfer efficiency and has received written approval by the Administrator; (d) copies of any Notifications; (e) copies of any annual reports; (f) records of any deviations from the federal requirements outlined in this permit. These records shall include: (i) the date and time period of the deviation; (ii) a description of the nature of the deviation; and (iii) the actions taken to correct the deviation; (g) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report; (h) records of usage of paint stripper containing MeCl, including: (i) Material Safety Data Sheets; and (ii) Purchase records; (i) hours of operation; and (j) Total Volume and VOC content of coatings, cleanup materials and surface preparation materials purchased.

#### Notification

- (1) Initial Notification
  - (a)The Permittee must submit initial notification within 180 days after the date of the initial startup. Existing shops (in operation before September 17, 2007) have until January 10, 2011 to submit their notification.
  - (b)The initial notification shall include the following: (i) the company name;; (ii) the street address (physical location) of the source; (iii) the name, title, street address, telephone number, e-mail address(if available) and signature of the owner and operator, or other certifying company official; (iv) the street address where compliance records are maintained, if different; (v) Identification of the relevant standard (40 CFR Part 63, subpart HHHHHHH); (vi) a brief description of the type of operation at this location, including the number of paint booth, number of preparation stations, and the number of painters usually employed; (vii) if there is any paint stripping performed with a paint stripper containing MeCl, the methods it is used with and the substrates tripped must be identified;
  - (c)The Permittee must include a compliance statement specifying whether the operation is in compliance with each of the requirements of the federal standard, or not; and
  - (d)If the compliance statement is that the facility is already in compliance, then the initial notification must also include a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy and completeness of the notification, a statement that the source has complied with all the relevant

standards of subpart HHHHHH, and that this initial notification also serves as the notification of compliance status.

(e)The initial notification shall be sent to:

United States Environmental Protection Agency Region III, Enforcement & Compliance Assurance Division Air, RCRA and Toxics Branch (3ED21) Four Penn Center 1600 John F. Kennedy Boulevard Philadelphia, PA 19103-2852

and

Maryland Department of the Environment Air and Radiation Administration, Compliance Program 1800 Washington Blvd, Suite 715 Baltimore, MD 21230

- (2) Compliance Status Notification
  - (a) A separate compliance status notification is only required for sources that do not certify compliance on their initial notification.
  - (b) The Permittee must submit a compliance status notification within 180 days after the date of initial startup, if required. Existing shops (in operation before September 17, 2007) have until March 11, 2011 to submit a compliance status notification.
  - (c) The compliance status notification shall include the following: (i) the company name; (ii) the street address (physical location of the source; (iii) the name, title, street address, telephone number, e-mail address (if available) and signature of the owner and operator, or other certifying company official; (iv) the street address where compliance records are maintained, if different; (v) a statement certifying the truth, accuracy, and completeness of notification; (vi) a statement whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.
  - (d) The compliance status notification shall be sent to:
     United States Environmental Protection Agency
     Region III, Enforcement & Compliance Assurance Division
     Air, RCRA and Toxics Branch (3ED21)

Four Penn Center 1600 John F. Kennedy Boulevard Philadelphia, PA 19103-2852

and

Maryland Department of the Environment Air and Radiation Administration, Compliance Program 1800 Washington Blvd, Suite 715 Baltimore, MD 21230

### **Annual Reporting**

- (1)An Annual Notification of Changes Report must be submitted by March 1 of each calendar year;
- (2)The Annual Notification of Changes Report shall include the following: (a) the company name; (b) the street address (physical location) of the source; (c) the name, title, street address, telephone number, e-mail address (if available) and signature of the owner and operator, or other certifying company official; (d) the street address where compliance records are maintained, if different; (e) a statement certifying the truth, accuracy, and completeness of notification; (f) a statement whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance; (g) any changes to any information submitted in either the initial notification or a previous annual notification of changes report; and (h) deviations from the relevant requirements.
- (3)This report is not required if there have been no deviations from any of the relevant requirements, and no changes to any information submitted on previous reports or notifications.

and

Maryland Department of the Environment Air and Radiation Administration, Compliance Program 1800 Washington Blvd, Suite 715 Baltimore, MD 21230

### **Emission Unit:**

Facility-wide

#### Compliance Status

Results of October 2023 compliance inspection:

Records of facility-wide VOC emissions and inspections were provided.

### **Applicable Standards and limits**

Control of VOC Emissions

- A. **COMAR 26.11.19.02I.** <u>Good Operating Practices, Equipment Cleanup, and VOC Storage</u>.
- "(1) <u>Applicability</u>. The requirements in this section apply to a person who owns or operates an installation that is subject to any requirement in this chapter.
- (2) Good Operating Practices.
- (a) A person who is subject to this section shall implement good operating practices to minimize VOC emissions into the atmosphere.
- (b) Good operating practices shall, at a minimum, include the following:
- (i) Provisions for training of operators on practices, procedures, and maintenance requirements that are consistent with the equipment manufacturers' recommendations and the source's experience in operating the equipment, with the training to include proper procedures for maintenance of air pollution control equipment;
- (ii) Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use;
- (iii) As practical, scheduling of operations to minimize color or material changes when applying VOC coatings or other materials by spray gun;
- (iv) For spray gun applications of coatings, use of high volume low pressure (HVLP) or other high efficiency application methods where practical; and
- (v) As practical, mixing or blending materials containing VOC in closed containers and taking preventive measures to minimize emissions for products that contain VOC.
- (c) A person subject to this regulation shall:

- (i) Establish good operating practices in writing;
- (ii) Make the written operating practices available to the Department upon request; and
- (iii) Display the good operating practices so that they are clearly visible to the operator or include them in operator training.
- (3) Equipment Cleanup.
- (a) A person subject to this section shall take all reasonable precautions to prevent or minimize the discharge of VOC into the atmosphere when cleaning process and coating application equipment, including containers, vessels, tanks, lines, and pumps.
- (b) Reasonable precautions for equipment cleanup shall, at a minimum, include the following:
- (i) Storing all wastes and waste materials, including cloth and paper that are contaminated with VOC, in closed containers;
- (ii) Preparing written standard operating procedures for frequently cleaned equipment, including when practical, provisions for the use of low-VOC or non-VOC materials and procedures to minimize the quantity of VOC materials used;
- (iii) Using enclosed spray gun cleaning, VOC-recycling systems and other spray gun cleaning methods where practical that reduce or eliminate VOC emissions; and
- (iv) Using, when practical, detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines, containers, and process equipment.
- (4) VOC Storage and Transfer.
- (a) A person subject to this section who stores VOCs shall, at a minimum, install conservation vents or other vapor control measures on storage tanks with a capacity of 2,000 gallons or more, to minimize VOC emissions.
- (b) A person subject to this section shall, at a minimum, utilize vapor balance, vapor control lines, or other vapor control measures when VOCs are transferred from a tank truck into a stationary storage tank with a capacity greater than 10,000 gallons and less than 40,000 gallons that store VOCs or materials containing VOCs, other than gasoline, that have a vapor pressure greater than 1.5 psia."

### **Compliance Demonstration**

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

The Permittee shall maintain: (1) Written descriptions of all "good operating practices" designed to minimize emissions of VOC from facility-wide operations.

[Reference: COMAR 26.11.19.02I] (2) Records of all inspections conducted to determine the facility's compliance status with regard to implementation of "good operating practices" designed to minimize emissions of VOC from facility-wide operations. The records shall include for each inspection the name of the inspector, the date and time of the inspection, and an account of the findings. [Reference: COMAR 26.11.03.06C] Good operating practices information as required by COMAR 26.11.19.02I shall be made available to the Department upon request.

B. **COMAR 26.11.19.16B, C & D** - <u>Control of VOC Equipment Leaks</u>
<u>"Applicability</u>. A person subject to any VOC emission standard or limitation established in this chapter and not otherwise subject to more specific VOC leak requirements of another regulation is subject to the requirements of this regulation.

<u>General Requirements</u>. A person subject to this regulation shall comply with all of the following requirements:

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

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

### **Compliance Demonstration**

The Permittee shall visually inspect all components on the premises for VOC leaks at least once each calendar month following the procedures specified in COMAR 26.11.19.16. [Reference: COMAR 26.11.19.16C(1)]. The Permittee shall maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, a list of leaks by tag identification number and identity of components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation if the source. The log shall be made available to the Department upon request. Leak records, along with the log shall be maintained for a period of not less than 2 years from the date of their occurrence. [Reference: COMAR 26.11.03.06C]. Leak inspection logs as required by COMAR 26.11.19.16 shall be made available to the Department upon request.

### **COMPLIANCE SCHEDULE**

NSA is currently in compliance with all applicable air quality regulations.

#### TITLE IV - ACID RAIN

Not Applicable

#### TITLE VI – OZONE DEPLETING SUBSTANCES

NSA is not subject to Title VI requirements.

#### SECTION 112(r) - ACCIDENTAL RELEASE

NSA is not subject to the requirements of Section 112(r).

#### PERMIT SHIELD

The NSA facility requested that a permit shield be expressly included in the Permittee's Part 70 permit. Permit shields are granted on an emission unit by emission unit basis. If an emission unit is covered by a permit shield, a permit shield statement will follow the emission unit table in Section IV - Plant Specific

Conditions of the permit. In this case, a permit shield was granted for each emission unit covered by the permit.

### **INSIGNIFICANT ACTIVITIES**

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

(1) No. 20 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;

### [For Areas III and IV]

The <u>affected fuel burning units</u> are subject to the following requirements:

COMAR 26.11.09.05A(2), which establishes that the Permittee 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.

Exceptions: COMAR 26.11.09.05A(2) does not apply to emissions during load changing, soot blowing, start-up, 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.

#### [For Distillate Fuel Oil]

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

(2) No. <u>17</u> Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

The affected units are subject to the following requirements:

- (A) COMAR 26.11.09.05E(2), Emissions During Idle Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (B) COMAR 26.11.09.05E(3), Emissions During Operating Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (C) Exceptions:
  - (i) COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
  - (ii) COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:
    - (a) Engines that are idled continuously when not in service: 30 minutes
    - (b) all other engines: 15 minutes.
  - (iii) COMAR 26.11.09.05E(2) & (3) do not apply while maintenance, repair or testing is being performed by qualified mechanics.
- (3) Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (4) 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;
- (5) No. 2 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

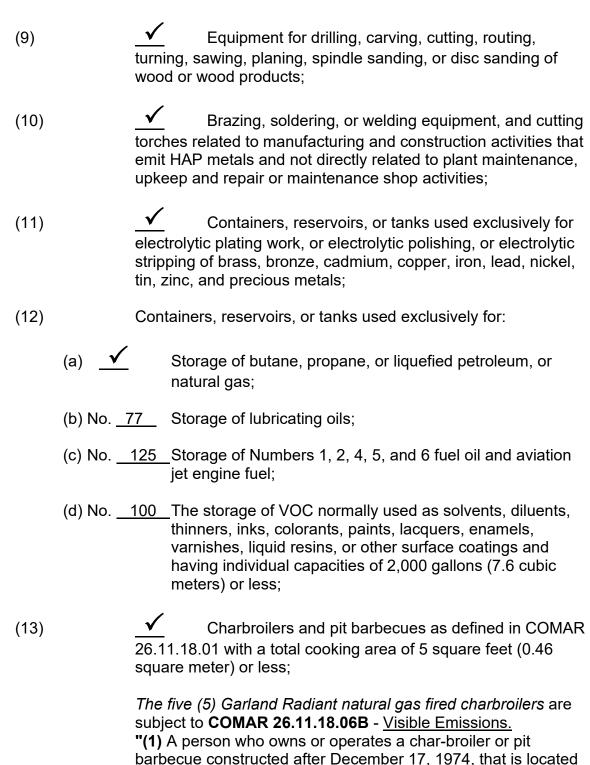
The <u>affected units</u> are subject to COMAR 26.11.19.09D, which requires that the Permittee control emissions of volatile organic

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.
- (6) Commercial bakery ovens with a rated heat input capacity of less than 2,000,000 Btu per hour;
- (7) Confection cookers where the products are edible and intended for human consumption;
- (8) <u>V</u> Die casting machines;



within 300 feet of the property line of any habitable dwelling may

not cause or permit the discharge of emissions greater than 10 percent opacity."

"(2) A person who constructs, owns, or operates a char-broiler or pit barbeque not subject to Sec. B(1), above, may not cause or permit the discharge of emissions greater than 30 percent opacity."

### **COMAR 26.11.18.06C** - Control Device Requirements for New Sources Near Habitable Dwellings.

"(1) A person who construct a char-broiler or pit barbecue and is subject to Sec. B(1), above, shall install an approved control device unless the person demonstrates to the satisfaction of the Department that the installation, when operated without control equipment, will meet Sec. B(1)."

- ✓ 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;
   ✓ Certain recreational equipment and activities, such as fireplaces, barbecue pits and cookers, fireworks displays, and
- (16) Potable water treatment equipment, not including air stripping equipment;
- (17) Firing and testing of military weapons and explosives;
- (18) Comfort air conditioning subject to requirements of Title VI of the Clean Air Act;
- (19) Laboratory fume hoods and vents;

kerosene fuel use:

(20) No. \_\_1 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.

### 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.

### 1. Applicable Regulations:

### (A) COMAR 26.11.06.08 – Nuisance.

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

### (B) COMAR 26.11.06.09 - Odors.

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

- (C) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T BACT) to control emissions of toxic air pollutants.
- (D) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health

#### Record Keeping and Reporting:

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

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

### NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD

### FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

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

12.	GENERAL RECORDKEEPING	33
	GENERAL CONFORMITY	
14.	ASBESTOS PROVISIONS	33
15.	OZONE DEPLETING REGULATIONS	34
16.	ACID RAIN PERMIT	34
SECTIO	ON IV PLANT SPECIFIC CONDITIONS	35
SECTIO	ON V INSIGNIFICANT ACTIVITIES	87
SECTIO	ON VI STATE-ONLY ENFORCEABLE CONDITIONS	93

### SECTION I SOURCE IDENTIFICATION

### 1. DESCRIPTION OF FACILITY

The National Security Agency (NSA) facility is located at Fort George G. Meade in Anne Arundel County, Maryland. The NSA campus at Fort Meade encompasses a wide range of administrative and manufacturing operations. Process operations include a plating operation, several paint spray booths, and a paper pulp operation for the destruction of classified paper products. Fuel burning equipment consisting of boilers and emergency generators are located throughout the facility. The primary SIC for this facility is 9711. Sources associated with SIC 3672 and 3674 were not included in this permit.

#### 2. FACILITY INVENTORY LIST

Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
Boilers > 10 MMBtu/hr	5-0502 thru 5-0504	Three (3) Union Iron Works natural gas/No. 2 fuel oil fired boilers each rated at 85 million Btu per hour.	January 1953
	5-0505	One (1) Keeler natural gas/No. 2 fuel oil fired boilers each rated at 90 million Btu per hour.	December 1969
Boilers <= 10 MMBtu/hr	5-0644 and 5-0645	Two (2) Lochinvar Power Fin natural gas boilers, each rated at 1.5 million Btu per hour heat input	August 2006
	5-0809	Four (4) Lochinvar natural gas fired boilers, each rated at 1.5 million Btu per hour heat input	September 2015
	5-0810	Four (4) Harsco natural gas fired boilers, each rated at 2.5 million Btu per hour	September 2015
	5-0811	Two (2) Harsco natural gas fired boilers each rated at 2.0 million Btu per hour	September 2015
	5-0823	Three (3) Lochinvar Crest Model FBN- 1501 natural gas fired boilers, each rated at 1.5 million Btu per hour heat input	September 2015
	5-0842	Four (4) Lochinvar natural gas fired boilers, each rated at 4.0 million Btu per hour heat input	November 2016

Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
	5-0891 and 5-0892	Two (2) Hydrotherm KN20 natural gas fired boilers, each rated at 1.99 million Btu per hour heat input	December 2019
	5-0900	Two (2) Hydrotherm KN20 natural gas fired boilers, each rated at 1.99 million Btu per hour heat input	September 2020
	5-0905	Four (4) Patterson Kelly natural gas fired boilers, each rated at 4.0 million Btu per hour heat input	February 2021
	5-0911	Three (3) Lochnivar natural gas fired boilers, each rated at 1.5 million Btu per hour heat input	November 2021
	5-0915	Three (3) Patterson Kelly natural gas fired boilers, each rated at 2.0 million Btu per hour heat input	July 2024
	5-0916	Three (3) Fulton natural gas fired boilers, each rated at 6.0 million Btu per hour heat input	January 2025
Emergency Generators	9-0804	One (1) Detroit Model 12N-4002 U-12 diesel fuel emergency generator rated at 600 kW	September 1994
	9-0806	One (1) Katolight Model V-1271 diesel fuel emergency generator rated at 560 kW	September 1997
	9-0818 thru 9-0823	Six (6) Cummins/Onan diesel fuel emergency generator sets each rated at 2700 kW (Standby)	March 2005
	9-0918	One (1) Katolight (Model D900X6T2) diesel fuel emergency generator rated at 900 kW	March 2008
	9-0967	One (1) Katolight (Model 415-J6T3) diesel fuel emergency generator rated at 415 kW.	September 2009
	9-1035	Eighteen (18) Cummins diesel emergency generators each rated at 2,750 kW and each equipped with SCR system	April 2012
	9-1055	Twenty-four (24) Caterpillar diesel emergency generators each rated at 2,725 kW and each equipped with SCR system	January 2015
	9-1090	MTU Onsite Energy diesel-fired emergency generator rated at 2,280 kW located in Building 9800C.	2014

Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
	9-1091	Seven (7) Caterpillar C175-16 diesel fired emergency generator sets, each rated at 3000 kW and equipped with selective catalytic reduction	2014
	9-1092	One (1) Caterpillar C32 diesel fired emergency generator set rated at 1000 kW	2014
	9-1116	Six (6) Caterpillar C175-16 emergency diesel generators each rated at 3000 kW (standby) and each equipped with an E-POD Selective Catalytic Reduction (SCR) system.	September 2015
	9-1117	Two (2) Caterpillar C15 life safety emergency diesel generator each rated at 500 kW (stand-by).	September 2015
	9-1136	One (1) Caterpillar C175-16 emergency diesel generator rated at 3000 kW and equipped with an E-POD Selective Catalytic Reduction (SCR) system.	November 2016
	9-1137	One (1) Caterpillar C 13 life safety emergency generator rated at 400 kW (Standby)	November 2016
	9-1146	One (1) Kohler emergency diesel-fired generator rated at 550 kW.	August 2017
	9-1155	Fourteen (14) Caterpillar diesel fired emergency generator sets, each rated at 3000-kW and equipped with Selective Catalytic Reduction (SCR) systems to control NO <sub>x</sub> emissions.	March 2018
	9-1156	One (1)Caterpillar diesel fired emergency generator set rated at 800 kW life safety emergency diesel generator set	January 2018
	9-1243	One (1) Cummins diesel fired emergency generator set rated at 800 kW	March 2022
	9-1244	One (1) Cummins diesel fired emergency generator set rated at 600 kW	March 2022
	9-1266	One (MTU) diesel fired emergency generator set rated at 750 kW	February 2025
9-0449 and 9-0450	9-0449 and 9-0450	Paper Pulp Operation consisting of an automatic material collection system and a	March 1978

Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
		separate continuous operating system controlled by baghouses.	
6-0375	6-0375	Plating Operation consisting of surface coating of steel or aluminum parts to add durability and extend service life, controlled by a packed bed scrubber emission control system.	June 1992
6-1114	6-1114	One (1) Future Cure Model 1000 paint spray booth for miscellaneous metal coating.	January 2002
6-1095	6-1095	One (1) Vehicle refinishing Equipment	August 2006
8-0340	8-0340	One (1) Radiant charbroiler	May 2018
8-0363	8-0363	Four (4) Garland Radiant natural gas charbroilers/griddles	November 2021

### 9800 SAVAGE ROAD

### FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

### 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

TAP Toxic Air Pollutant tpy tons per year VE Visible Emissions

VOC Volatile Organic Compounds

#### 3. EFFECTIVE DATE

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

#### 4. PERMIT EXPIRATION

### [COMAR 26.11.03.13B(2)]

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

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

#### 5. PERMIT RENEWAL

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

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

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information no later than 10 days after becoming aware that this occurred. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a completed application was submitted, but prior to the release of a draft permit. This information shall be submitted to the Department no later than 20 days after a new requirement has been adopted.

#### 6. CONFIDENTIAL INFORMATION

[COMAR 26.11.02.02G]

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

#### 7. PERMIT ACTIONS

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

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

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

- a. Additional requirements of the Clean Air Act become applicable to this facility and the remaining permit term is 3 years or more;
- b. The Department or the EPA determines that this Part 70 permit contains a material mistake, or is based on false or inaccurate information supplied by or on behalf of the Permittee;
- c. The Department or the EPA determines that this Part 70 permit must be revised or revoked to assure compliance with applicable requirements of the Clean Air Act; or

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

#### 8. PERMIT AVAILABILITY

[COMAR 26.11.02.13G]

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

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

[COMAR 26.11.03.20B]

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

#### 10. TRANSFER OF PERMIT

[COMAR 26.11.02.02E]

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

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

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

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

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

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

#### [COMAR 26.11.03.17]

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

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

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

#### 13. MINOR PERMIT MODIFICATIONS

#### [COMAR 26.11.03.16]

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

- a. A minor permit modification is a Part 70 permit revision that:
  - (1) Does not result in a violation of any applicable requirement of the Clean Air Act;
  - (2) Does not significantly revise existing federally enforceable monitoring, including test methods, reporting, record keeping, or compliance certification requirements except by:
    - (a) Adding new requirements,

- (b) Eliminating the requirements if they are rendered meaningless because the emissions to which the requirements apply will no longer occur, or
- (c) Changing from one approved test method for a pollutant and source category to another;
- (3) Does not require or modify a:
  - (a) Case-by-case determination of a federally enforceable emissions standard.
  - (b) Source specific determination for temporary sources of ambient impacts, or
  - (c) Visibility or increment analysis;
- (4) Does not seek to establish or modify a federally enforceable permit term or condition for which there is no corresponding underlying applicable requirement of the Clean Air Act, but that the Permittee has assumed to avoid an applicable requirement to which the source would otherwise be subject, including:
  - (a) A federally enforceable emissions standard applied to the source pursuant to COMAR 26.11.02.03 to avoid classification as a Title I modification; and
  - (b) An alternative emissions standard applied to an emissions unit pursuant to regulations promulgated under Section 112(i)(5) of the Clean Air Act
- (5) Is not a Title I modification; and
- (6) Is not required under COMAR 26.11.03.17 to be processed as a significant modification to this Part 70 permit.
- b. Application for a Minor Permit Modification

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

- (1) A description of the proposed change, the emissions resulting from the change, and any new applicable requirements that will apply if the change is made;
- (2) The proposed minor permit modification;
- (3) Certification by a responsible official, in accordance with COMAR 26.11.02.02F, that:
  - (a) The proposed change meets the criteria for a minor permit modification, and
  - (b) The Permittee has obtained or applied for all required permits-to-construct required by COMAR 26.11.03.16 with respect to the proposed change;
- (4) Completed forms for the Department to use to notify the EPA and affected states, as required by COMAR 26.11.03.07-.12.
- c. Permittee's Ability to Make Change
  - (1) For changes proposed as minor permit modifications to this permit that will require the applicant to obtain a permit to construct, the permit to construct must be issued prior to the new change.
  - (2) During the period of time after the Permittee applies for a minor modification but before the Department acts in accordance with COMAR 26.11.03.16F(2):
    - (a) The Permittee shall comply with applicable requirements of the Clean Air Act related to the change and the permit terms and conditions described in the application for the minor modification.
    - (b) The Permittee is not required to comply with the terms and conditions in the permit it seeks to modify. If the Permittee fails to comply with the terms and conditions in the application during this time, the terms and conditions of both this permit and the application for modification may be enforced against it.

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

#### 14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS

#### [COMAR 26.11.03.15]

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

- a. An application for an administrative permit amendment shall:
  - (1) Be in writing;
  - (2) Include a statement certified by a responsible official that the proposed amendment meets the criteria in COMAR 26.11.03.15 for an administrative permit amendment, and
  - (3) Identify those provisions of this part 70 permit for which the amendment is requested, including the basis for the request.
- b. An administrative permit amendment:
  - (1) Is a correction of a typographical error;
  - (2) Identifies a change in the name, address, or phone number of a person identified in this permit, or a similar administrative change involving the Permittee or other matters which are not directly related to the control of air pollution;
  - (3) requires more frequent monitoring or reporting by the Permittee:

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

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

[COMAR 26.11.03.19]

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

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

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

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

#### [COMAR 26.11.03.18]

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

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

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

- g. The permit shield in COMAR 26.11.03.23 does not apply to on-permit changes under COMAR 26.11.03.18.
- h. The Permittee is subject to enforcement action if it is determined that an on-permit change made under COMAR 26.11.03.18 is not within the scope of the regulation or violates any requirement of the State air pollution control law.

#### 17. FEE PAYMENT

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

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

### 18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS [COMAR 26.11.02.09.]

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

- a. New Source Review source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;
- Prevention of Significant Deterioration source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;
- c. New Source Performance Standard source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

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

### 19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION [COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

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

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

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

#### 20. PROPERTY RIGHTS

#### [COMAR 26.11.03.06E(4)]

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

#### 21. SEVERABILITY

#### [COMAR 26.11.03.06A(5)]

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

#### 22. INSPECTION AND ENTRY

#### [COMAR 26.11.03.06G(3)]

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

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

#### 23. DUTY TO PROVIDE INFORMATION

#### [COMAR 26.11.03.06E(5)]

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

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

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

#### 24. COMPLIANCE REQUIREMENTS

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

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

- a. Enforcement action.
- b. Permit revocation or revision,
- c. Denial of the renewal of a Part 70 permit, or
- d. Any combination of these actions.

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

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

#### 25. CREDIBLE EVIDENCE

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

#### 26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

[COMAR 26.11.03.06E(2)]

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

#### 27. CIRCUMVENTION

[COMAR 26.11.01.06]

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

#### 28. PERMIT SHIELD

[COMAR 26.11.03.23]

A permit shield as described in COMAR 26.11.03.23 shall apply only to terms and conditions in this Part 70 permit that have been specifically identified as covered by the permit shield. Neither this permit nor COMAR 26.11.03.23 alters the following:

a. The emergency order provisions in Section 303 of the Clean Air Act, including the authority of EPA under that section;

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

#### 29. ALTERNATE OPERATING SCENARIOS

[COMAR 26.11.03.06A(9)]

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

#### SECTION III PLANT WIDE CONDITIONS

#### 1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION

[COMAR 26.11.06.03D]

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

#### 2. OPEN BURNING

[COMAR 26.11.07]

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

#### 3. AIR POLLUTION EPISODE

[COMAR 26.11.05.04]

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

#### 4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS

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

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

 Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation;

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

#### 5. ACCIDENTAL RELEASE PROVISIONS

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

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

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

#### 6. GENERAL TESTING REQUIREMENTS

#### [COMAR 26.11.01.04]

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

#### 7. EMISSIONS TEST METHODS

#### [COMAR 26.11.01.04]

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

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

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

#### 8. EMISSIONS CERTIFICATION REPORT

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

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

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

- (a) Significant maintenance performed,
- (b) Malfunctions and downtime, and
- (c) Episodes of reduced efficiency of all equipment;
- (6) Limitations on source operation or any work practice standards that significantly affect emissions; and
- (7) Other relevant information as required by the Department.

#### 9. COMPLIANCE CERTIFICATION REPORT

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

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

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

#### 10. CERTIFICATION BY RESPONSIBLE OFFICIAL

#### [COMAR 26.11.02.02F]

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

The certification shall be in the following form:

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

#### 11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING

#### [COMAR 26.11.03.06C(5)]

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

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

f. The results of each analysis.

#### 12. GENERAL RECORDKEEPING

#### [COMAR 26.11.03.06C(6)]

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

These records and support information shall include:

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

#### 13. GENERAL CONFORMITY

#### [COMAR 26.11.26.09]

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

#### 14. ASBESTOS PROVISIONS

#### [40 CFR 61, Subpart M]

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

#### 15. OZONE DEPLETING REGULATIONS

#### [40 CFR 82, Subpart F]

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

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

#### 16. ACID RAIN PERMIT

Not applicable

#### SECTION IV PLANT SPECIFIC CONDITIONS

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

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

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

#### Table IV - 1

#### 1.0 Emissions Unit Number(s): Boilers > 10 MMBtu/hr

5-0502 thru 5-0504 – Three Union Works natural gas/No. 2 fuel oil fired boilers each rated at 85 million Btu/hr heat input. 5-0505 – One Keeler natural gas/No. 2 fuel oil fired boiler rated at 90

5-0505 – One Keeler natural gas/No. 2 fuel oil fired boiler rated at 90 million Btu/hr heat input.

#### 1.1 | Applicable Standards/Limits:

#### A. Control of Visible Emissions

#### **COMAR 26.11.09.05A** – Fuel Burning Equipment

- "(2) Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.
- (3) <u>Exceptions</u>. Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:
- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period."

### 9800 SAVAGE ROAD

### FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

#### Table IV – 1

#### B. Control of Sulfur Oxides

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

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

#### C. Control of Nitrogen Oxides

COMAR 26.11.09.08B(5) - Operator Training.

- a) For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.
- b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department." **COMAR 26.11.09.08E**. Requirements for Fuel-Burning Equipment with a Rated Heat Input Capacity of 100 Million Btu Per Hour or Less. "A person who owns or operates fuel-burning equipment with a rated heat input capacity of 100 Million Btu per hour or less shall:
- 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."

#### D. Operational Limits

The Permittee shall only burn natural gas with No. 2 fuel oil as back up fuel unless the Permittee applies for and receives an approval or permit from the Department to burn alternate fuels. [Reference: COMAR 26.11.02.09A].

#### 1.2 Testing Requirements:

A. <u>Control of Visible Emissions</u> See Monitoring Requirements.

### 9800 SAVAGE ROAD

### FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

#### Table IV – 1

#### B. Control of Sulfur Oxides

See Monitoring Requirements.

#### C. Control of Nitrogen Oxides

The Permittee shall perform a combustion analysis once a year.

[Reference: COMAR 26.11.09.08E(2)].

#### D. Operational Limits

See Record Keeping Requirements.

#### 1.3 | Monitoring Requirements:

#### A. Control of Visible Emissions

The Permittee shall:

- (1) Properly operate and maintain the boilers in a manner to prevent visible emissions: and
- (2) Verify no visible emissions when burning No. 2 fuel oil. The Permittee shall perform a visual observation for a 6-minute period once for each 168 hours that the boiler burns oil or at a minimum of once per year.

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

- (1) Inspect combustion control 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 the inspections, adjustments and/or repairs to the boiler; and
- (4) After 48 hours, if the required adjustments and/or repairs had not eliminated the visible emissions, perform Method 9 observations once daily for 18 minutes until corrective actions have eliminated the visible emissions.

[Reference: COMAR 26.11.03.06C].

#### B. Control of Sulfur Oxides

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

#### C. Control of Nitrogen Oxides

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

#### Table IV - 1

#### D. Operational Limits

See Record Keeping Requirements.

#### 1.4 Record Keeping Requirements:

**Note:** All records must be maintained for a period of 5 years.

[Reference: COMAR 26.11.03.06.C (5)(g)].

#### A. Control of Visible Emissions

The Permittee shall:

- (1) Maintain an operation manual and prevention maintenance plan on site:
- (2) Maintain a record of the maintenance preformed that relates to combustion performance;
- (3) Maintain a log of visible emissions observations performed and make it available to the Department's representative upon request;
- (4) Maintain a record of the hours that No. 2 fuel oil is burned.

[Reference: COMAR 26.11.03.06C].

#### B. Control of Sulfur Oxides

The Permittee shall maintain records of fuel supplier's certification and shall make records available to the Department upon request.

[Reference: COMAR 26.11.03.06C].

#### C. Control of Nitrogen Oxides

The Permittee shall maintain:

- (1) The Permittee shall maintain records of the results of the annual combustion analysis on site. [Reference: COMAR 26.11.09.08E(5)].
- (2) Record of training program attendance for each operator at the site. [Reference: COMAR 26.11.09.08E(5)].

#### D. Operational Limits

The Permittee shall maintain records of the quantity and types of fuel burned. [Reference: COMAR 26.11.02.19C(1)(c)]

#### 1.5 Reporting Requirements:

#### A. Control of Visible Emissions

The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations".

#### NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD

### FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

#### Table IV – 1

#### B. Control of Sulfur Oxides

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

#### C. Control of Nitrogen Oxides

The Permittee shall submit:

- 1) The results of combustion analysis to the department and the EPA upon request. [Reference: COMAR 26.11.09.08E(3)]
- 2) A record of training program attendance for each operator to the Department upon request. [Reference: COMAR 26.11.09.08E(5)].

#### D. Operational Limits

The Permittee shall submit records of the quantity and type of fuels burn with the annual emissions certification report. See permit condition 8 of Section III.

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

#### Table IV - 1a

#### 1a.0 Emissions Unit Number(s): Boilers > 10 MMBtu/hr Cont'd

5-0502 thru 5-0504 – Three Union Works natural gas/No. 2 fuel oil fired boilers each rated at 85 million Btu/hr heat input.

5-0505 – One Keeler natural gas/No. 2 fuel oil fired boiler rated at 90 million Btu/hr heat input.

#### 1a.1 | Applicable Standards/Limits:

#### Control of HAPs:

40 CFR Part 63, Subpart JJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

§63.11193 - Am I subject to this subpart?

You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

§63.11196 - What are my compliance dates?

#### NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD FORT GEORGE G. MEADE, MD 20755-6218

### DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

#### Table IV - 1a

- (a) If you own or operate an existing affected boiler, you must achieve compliance with the applicable provisions in this subpart as specified in paragraphs (a)(1) through (3) of this section.
- (1) If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management practice standard no later than March 21, 2014.
- (2) If the existing affected boiler is subject to emission limits, you must achieve compliance with the emission limits no later than March 21, 2014.
- (3) If the existing affected boiler is subject to the energy assessment requirement, you must achieve compliance with the energy assessment requirement no later than March 21, 2014.

#### §63.11201 - What standards must I meet?

- (a) You must comply with each emission limit specified in Table 1 to this subpart that applies to your boiler.
- (b) You must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 to this subpart satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement.
- (c) You must comply with each operating limit specified in Table 3 to this subpart that applies to your boiler.
- (d) These standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in §63.11237, during which time you must comply only with Table 2 to this subpart.

### Table 2 to Subpart JJJJJJ of Part 63—Work Practice Standards, Emission Reduction Measures, and Management Practices

As stated in §63.11201, you must comply with the following applicable work practice standards, emission reduction measures, and management practices:

If your boiler is in this subcategory	You must meet the following
	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of

Table IV – 1a		
than 5 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to- fuel ratio	the boiler <b>biennially</b> as specified in §63.11223.	
16. Existing coal-fired, biomass-fired, or oil-fired boilers (units with heat input capacity of 10 MMBtu/hr and greater), not including limiteduse boilers	Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items (1) to (4) appropriate for the on-site technical hours listed in §63.11237:	
	(1) A visual inspection of the boiler system,	
	(2) An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints,	
	(3) An inventory of major energy use systems consuming energy from	

Table IV – 1a		
	affected boiler(s) and which are under control of the boiler owner or operator,	
	(4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,	
	(5) A list of major energy conservation measures that are within the facility's control,	
	(6) A list of the energy savings potential of the energy conservation measures identified, and	
	(7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.	

#### 1a.2 **Testing Requirements**:

#### Control of HAPs:

**§63.11223** - <u>How do I demonstrate continuous compliance with the work practice and management practice standards?</u>

- "(a) For affected sources subject to the work practice standard or the management practices of a tune-up, you must conduct a performance tune-up according to paragraph (b) of this section and keep records as required in §63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up."
- "(b) Except as specified in paragraphs (c) through (f) of this section, you must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (b)(1) through (7) of this section. Each **biennial** tune-up must be conducted no more than 25 months after the previous tune-up. For a new or reconstructed boiler, the

#### Table IV - 1a

first biennial tune-up must be no later than 25 months after the initial startup of the new or reconstructed boiler.

- (1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.
- (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.
- (4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- (5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- (6) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of this section.
- (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
- (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
- (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- (7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup."

#### 1a.3 | Monitoring Requirements:

Control of HAPs:

#### Table IV - 1a

The Permittee must operate and maintain, at all times, any affected source, including air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [Reference: 40 CFR §63.11205(a)]

#### 1a.4 Record Keeping Requirements:

#### Control of HAPs:

**§63.11225** - What are my notification, reporting, and **recordkeeping** requirements?

- "(c) You must maintain the records specified in paragraphs (c)(1) through (7) of this section.
- (1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.
- (2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified in paragraphs (c)(2)(i) through (vi) of this section.
- (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
- (ii) Not Applicable.
- (iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.
- (iv) For each boiler subject to an emission limit in Table 1 to this subpart, you must also keep records of monthly fuel use by each boiler, including the type(s) of fuel and amount(s) used.
- (v) For each boiler that meets the definition of seasonal boiler, you must keep records of days of operation per year.
- (vi) For each boiler that meets the definition of limited-use boiler, you must keep a copy of the federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent and records of fuel use for the days the boiler is operating.
- (3) For sources that demonstrate compliance through fuel analysis, a copy of all calculations and supporting documentation that were done to demonstrate compliance with the mercury emission limits. Supporting documentation should include results of any fuel analyses. You can use the results from one fuel analysis for multiple boilers provided they are all burning the same fuel type.

#### NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD

### FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

#### Table IV - 1a

- (4) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
- (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- (6) You must keep the records of all inspection and monitoring data required by §§63.11221 and 63.11222, and the information identified in paragraphs (c)(6)(i) through (vi) of this section for each required inspection or monitoring.
- (i) The date, place, and time of the monitoring event.
- (ii) Person conducting the monitoring.
- (iii) Technique or method used.
- (iv) Operating conditions during the activity.
- (v) Results, including the date, time, and duration of the period from the time the monitoring indicated a problem to the time that monitoring indicated proper operation.
- (vi) Maintenance or corrective action taken (if applicable).
- (7) Not Applicable.
- (d) Your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years."

#### 1a.5 Reporting Requirements:

#### Control of HAPs:

### **§63.11225** - What are my **notification**, **reporting**, and recordkeeping requirements?

- "(a) You must submit the notifications specified in paragraphs (a)(1) through (5) of this section to the administrator.
- (1) You must submit all of the notifications in §§63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to you by the dates specified in those sections except as specified in paragraphs (a)(2) and (4) of this section.
- (2) An Initial Notification must be submitted no later than January 20, 2014 or within 120 days after the source becomes subject to the standard.

#### Table IV - 1a

- (3) If you are required to conduct a performance stack test you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance stack test is scheduled to begin.
- (4) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in §63.11196 unless you must conduct a performance stack test. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official.
- (i) You must submit the information required in §63.9(h)(2), except the information listed in §63.9(h)(2)(i)(B), (D), (E), and (F). If you conduct any performance tests or CMS performance evaluations, you must submit that data as specified in paragraph (e) of this section. If you conduct any opacity or visible emission observations, or other monitoring procedures or methods, you must submit that data to the Administrator at the appropriate address listed in §63.13.
- (ii) "This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler."
- (iii) "This facility has had an energy assessment performed according to §63.11214(c)."
- (iv) For units that install bag leak detection systems: "This facility complies with the requirements in §63.11224(f)."
- (v) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
- (vi) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in §63.13.
- (5) If you are using data from a previously conducted emission test to serve as documentation of conformance with the emission standards and operating limits of this subpart, you must include in the Notification of Compliance Status the date of the test and a summary of the results, not a complete test report, relative to this subpart.
- (b) You must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification

# NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

### Table IV - 1a

report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of this section. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section. For boilers that are subject only to a requirement to conduct a biennial or 5-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this section.

- (1) Company name and address.
- (2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
- (i) "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."
- (ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
- (iii) "This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."
- (3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- (4) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure."

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

# 9800 SAVAGE ROAD

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

### Table IV - 2

# 2.0 Emissions Unit Number(s): Boilers < 10 MMBtu/hr

5-0644 and 5-0645 – Two (2) Lochinvar Power Fin (Model PB1500M9) natural gas-fired boilers each rated at 1.5 million Btu/hr heat input. 5-0809 – Four (4) Lochinvar natural gas fired boilers, each rated at 1.5 million Btu per hour heat input

5-0810 – Four (4) Harsco natural gas fired boilers, each rated at 2.5 million Btu per hour

5-0811 – Two (2) Harsco natural gas fired boilers each rated at 2.0 million Btu per hour

5-0823 – Three (3) Lochinvar Crest Model FBN-1501 natural gas fired boilers, each rated at 1.5 million Btu per hour heat input

5-0842 – Four (4) Lochinvar natural gas fired boilers each rated at 4.0 million Btu per hour heat input.

5-089 and 5-0892 – Two (2) Hydrotherm KN20 natural gas fired boilers, each rated at 1.99 million Btu per hour

5-0900 – Two (2) Hydrotherm KN20 natural gas fired boilers, each rated at 1.99 million Btu per hour heat input

5-0905 – Four (4) Patterson Kelly natural gas fired boilers, each rated at 4.0 million Btu per hour heat input

5-0911 – Three (3) Lochnivar natural gas fired boilers, each rated at 1.5 million Btu per hour heat input

5-0915 – Three (3) Patterson Kelly natural gas fired boilers, each rated at 2.0 million Btu per hour heat input

5-0916 – Three (3) Fulton natural gas fired boilers, each rated at 6.0 million Btu per hour heat input

### 2.1 | Applicable Standards/Limits:

#### A. Control of Visible Emissions

# COMAR 26.11.09.05A – Fuel Burning Equipment

- "(2) Areas III and IV. In Areas III and IV, a person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.
- (3) <u>Exceptions</u>. Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:
- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period."

# NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

### Table IV - 2

### B. Control of Nitrogen Oxides

# COMAR 26.11.09.08B(5) - Operator Training.

- (a) For purposes of this regulation, the equipment operator to be trained may be the person who maintains the equipment and makes the necessary adjustments for efficient operation.
- (b) The operator training course sponsored by the Department shall include an in-house training course that is approved by the Department."

## COMAR 26.11.09.08F - Requirements for Space Heaters.

- "(1) A person who owns or operates a space heater as defined in Regulation .01B of this chapter shall:
  - (a) Submit to the Department a list of each affected installation on the premises and the types of fuel used in each installation;
  - (b) Develop an operating and maintenance plan to minimize NO<sub>X</sub> emissions based on the recommendations of equipment vendors and other information including the source's operating and maintenance experience;
  - (c) Implement the operating and maintenance plan and maintain the plan at the premises for review upon request by the Department;
  - (d) Require installation operators to attend in-State operator training programs once every 3 years on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and
  - (e) 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.
- (2) A person who owns or operates an installation that no longer qualifies as a space heater shall inform the Department not later than 60 days after the date when the fuel-burning equipment did not qualify, and shall meet the applicable fuel-burning equipment RACT requirement in this regulation."

"Space heater" means fuel-burning equipment that consumes more than 60 percent of its annual fuel during the period from October 31 of one year through March 31 of the following year. For the purpose of this regulation, annual fuel use is the total fuel consumed during the period October 1 of one year to September 30 of the following year, beginning October 1, 1989.

#### C. Operational Limits

The Permittee shall only burn natural gas unless the Permittee applies for and receives an approval or permit from the Department to burn an alternate fuel. [Reference: COMAR 26.11.02.09A].

# 2.2 Testing Requirements:

#### A. Control of Visible Emissions

### Table IV - 2

See Monitoring Requirements.

#### B. Control of Nitrogen Oxides

See Monitoring Requirements.

# C. Operational Limits

See Monitoring Requirements.

# 2.3 | Monitoring Requirements:

#### A. Control of Visible Emissions

No periodic monitoring for opacity is required.

# B. Control of Nitrogen Oxides

The Permittee shall develop and maintain an operating and maintenance plan to minimize NOx emissions. [Reference: COMAR 26.11.09.08F(1)(b)].

### C. Operational Limits

See Record Keeping Requirements.

# 2.4 Record Keeping Requirements:

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

#### A. Control of Visible Emissions

See Reporting Requirements.

#### B. Control of Nitrogen Oxides

The Permittee shall maintain:

- 1) Records of maintenance performed that relates to combustion performance in keeping with the requirements of an operations and maintenance plan. [Reference: COMAR 26.11.09.08F(1)(c)].
- 2) Record of training program attendance for each operator. [Reference: COMAR 26.11.09.08F(1)(e)].
- 3) An operations manual and preventive maintenance plan. [Reference: COMAR 26.11.09.08F(1)(b)].
- 4) Records of fuel use that demonstrate that the boiler meets the definition of a space heater. [Reference: COMAR 26.11.09.08K(3) and COMAR 26.11.03.06C].

#### C. Operational Limits

The Permittee shall maintain records of the quantity and types of fuel burned. [Reference: COMAR 26.11.02.19C(1)(c)].

### Table IV - 2

# 2.5 Reporting Requirements:

### A. Control of Visible Emissions

The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations".

## B. Control of Nitrogen Oxides

The Permittee shall submit: a record of training program attendance for each operator to the Department upon request. [Reference: COMAR 26.11.09.08F(1)(e)]

## C. Operational Limits

The Permittee shall submit records of the quantity and type of fuels burn with the annual emissions certification report. See permit condition 8 of Section III.

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

# Table IV – 3

# 3.0 Emissions Unit Number(s): Emergency Generators

- 9-0804 One (1) Detroit (Model 12N-4992 U-12) diesel fuel emergency generator rated at 600 kW.
- 9-0806 One (1) Katolight (Model V-1271) diesel fuel emergency generator rated at 560 kW.
- 9-0818 thru 9-0823 Six (6) Cummins/Onan diesel fuel emergency generator sets each rated at 2700 kW (Standby)
- 9-0918 One (1) Katolight (D900X6T2) diesel fuel emergency generator set rated 900 kW.
- 9-0967 One (1) Katolight (Model 415-J6T30 emergency diesel generator rated at 415 kW.
- 9-1035 One (1) group of eighteen (18) Cummins diesel emergency generators each rated at 2,750 kW and each equipped with SCR system 9-1055 One (1) group of twenty-four (24) Caterpillar diesel emergency generators each rated at 2,725 kW and each equipped with SCR system.

# 9800 SAVAGE ROAD

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

#### Table IV – 3

- 9-1090 One (1) MTU Onsite Energy diesel-fired emergency generator rated at 2,280 kW.
- 9-1091 Seven (7) Caterpillar C175-16 diesel fired emergency generator sets, each rated at 3000 kW and equipped with selective catalytic reduction. 9-1092 One (1) Caterpillar C32 diesel fired emergency generator set rated at 1000 kW.
- 9-1116 Six (6) Caterpillar C175-16 emergency diesel generators each rated at 3000 kW (standby) and each equipped with an E-POD Selective Catalytic Reduction (SCR) system.
- 9-1117 Two (2) Caterpillar C15 life safety emergency diesel generator each rated at 500 kW (stand-by).
- 9-1136 One (1) Caterpillar C175-16 emergency diesel generator rated at 3000-KW and equipped with an E-POD Selective Catalytic Reduction (SCR) system.
- 9-1137 One (1) Caterpillar C 13 life safety emergency generator rated at 400-kW (Standby).
- 9-1146 One (1) Kohler emergency diesel-fired generator rated at 550 kW.
- 9-1155 Fourteen (14) Caterpillar diesel fired emergency generator sets, each rated at 3000 kW and equipped with Selective Catalytic Reduction (SCR) systems to control NO<sub>X</sub> emissions.
- 9-1156 One (1) Caterpillar diesel fired emergency generator set rated at 850 kW.
- 9-1243 One (1) Cummins diesel fired emergency generator set rated at 800 kW.
- 9-1244 One (1) Cummins diesel fired emergency generator set rated at 600 kW.
- 9-1266 One (1) MTU diesel fired emergency generator set rated at 750 kW.

# 3.1 Applicable Standards/Limits:

#### A. Control of Visible Emissions

**COMAR 26.11.09.05E** - <u>Stationary Internal Combustion Engine Powered Equipment</u>.

- "(2) Emissions During Idle Mode. A person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (3) <u>Emissions During Operating Mode</u>. A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (4) Exceptions.
- (a) Section E(2) of this regulation does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.

# NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD PT GEORGE G MEADE MD 20755 6219

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

### Table IV – 3

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

# B. Control of Sulfur Oxides

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

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

## C. Control of Nitrogen Oxides

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

- (1) A person who owns or operates fuel-burning equipment with a capacity factor (as defined in 40 CFR Part 72.2) of 15 percent or less shall:
  - (a) Provide certification of the capacity factor of the equipment to the Department in writing;
  - (b) For fuel-burning equipment that operates more than 500 hours during a calendar year, perform a combustion analysis and optimize combustion at least once annually;
  - (c) Maintain the results of the combustion analysis at the site for at least 2 years and make these results available to the Department and the EPA upon request;
  - (d) Require each operator of an installation, except combustion turbines, to attend operator training programs at least once every 3 years, on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and
  - (e) Maintain a record of training program attendance for each operator at the site, and make these records available to the Department upon request.

#### D. Operational Limits:

1) Each of the six (6) Cummins/Onan emergency generator sets shall not operate more than 125 hours a year, unless the source obtains a prior approval from the Department. [Reference: MDE PTC Registration No. 9-0818 thru 9-0823, Condition D2]

### Table IV - 3

## 3.2 Testing Requirements:

## A. Control of Visible Emissions

See Monitoring Requirements.

#### B. Control of Sulfur Oxides

See Monitoring Requirements.

## C. Control of Nitrogen Oxides

The Permittee shall perform a combustion analysis and optimize combustion at least once annually for any of the engines that operates more than 500 hours during a calendar year. [Reference: COMAR 26.11.09.08G(1)(b)].

### D. Operational Limits

See Monitoring Requirements.

#### 3.3 | Monitoring Requirements:

## A. Control of Visible Emissions

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

### B. Control of Sulfur Oxides

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

#### C. Control of Nitrogen Oxides

For engines that operate more than 500 hours during a calendar year, the Permittee shall perform a combustion analysis and optimize combustion. **[Reference: COMAR 26.11.03.06C]**.

#### D. Operational Limits:

The Permittee shall log the number of hours each generator is operated on a monthly basis for generator preventive maintenance. [Reference: COMAR 26.11.03.06C]

#### 3.4 | Record Keeping Requirements:

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

# 9800 SAVAGE ROAD

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

### Table IV – 3

# A. Control of Visible Emissions

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

# B. Control of Sulfur Oxides

The Permittee shall retain annual fuel supplier certifications stating that the fuel oil is in compliance with this regulation must be maintained for at least 5 years. [Reference: COMAR 26.11.09.07C].

## C. Control of Nitrogen Oxides

The Permittee shall maintain records of the results of the combustion analyses on site for at least five years and make them available to the Department and EPA upon request. [Reference: COMAR 26.11.09.08G(1)(c) & COMAR 26.11.03.06C]. The Permittee shall maintain a record of the calculated capacity factor. [Reference: COMAR 26.11.09.08G(1)(c)]. The Permittee shall maintain record of training program attendance for each operator on site for at least five years and make the records available to the Department upon request. [Reference: COMAR 26.11.09.08G(e) & COMAR 26.11.03.06C].

# D. Operational Limits:

The Permittee shall maintain records of hours of Preventative Maintenance testing operation, utility provider-requested operation and emergency operation and fuel usage on a monthly basis and maintain on site for at least five (5) years. [Reference: MDE Registration No. 9-0818 thru 9-0823, Condition E1]

# 3.5 Reporting Requirements:

#### A. Control of Visible Emissions

The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4,Section III, Plant Wide Condition, "Report of Excess Emissions and Deviations"

### B. Control of Sulfur Oxides

The Permittee shall report annual fuel supplier certification to the Department upon request. [Reference: COMAR 26.11.09.07C].

### C. Control of Nitrogen Oxides

The Permittee shall provide certification of the capacity factor of the equipment to the Department in writing as part of the April 1 certification report. [Reference: COMAR 26.11.03.06C]. The Permittee shall submit a

# NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD FORT GEORGE G. MEADE, MD 20755-621

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

#### Table IV – 3

list of trained operators to the Department upon request. [Reference: COMAR 26.11.09.08G(e) and COMAR 26.11.03.06C].

## D. Operational Limits

The Permittee shall report to the Department records of hours of operation, fuel used and emission estimates for each emergency generator with the annual Emissions Certification Report [Reference: MDE Registration No. 9-0818 thru 9-0823, Condition E1].

#### Table IV – 3a

## 3a.0 | Emissions Unit Number(s): Emergency Generators Cont'd

9-0918 – One (1) Katolight (D900X6T2) diesel fuel emergency generator set rated 900 kW.

9-0967 – One (1) Katolight (Model 415-J6T30 emergency diesel generator rated at 415 kW.

9-1035 – One (1) group of eighteen (18) Cummins diesel emergency generators each rated at 2,750 kW and each equipped with SCR system 9-1055 – One (1) group of twenty-four (24) Caterpillar diesel emergency generators each rated at 2,725 kW and each equipped with SCR system. 9-1090 – One (1) MTU Onsite Energy diesel-fired emergency generator.

9-1091 – Seven (7) Caterpillar C175-16 diesel fired emergency generator sets, each rated at 3000 kW and equipped with selective catalytic reduction.

9-1092 – One (1) Caterpillar C32 diesel fired emergency generator set rated at 1000 kW.

9-1116 – Six (6) Caterpillar C175-16 emergency diesel generators each rated at 3000 kW (standby) and each equipped with an E-POD Selective Catalytic Reduction (SCR) system..

9-1117 – Two (2) Caterpillar C15 life safety emergency diesel generator each rated at 500 kW (stand-by).

9-1136 – One (1) Caterpillar C175-16 emergency diesel generator rated at 3000 kW and equipped with an E-POD Selective Catalytic Reduction (SCR) system.

9-1137 – One (1) Caterpillar C 13 life safety emergency generator rated at 400 kW (Standby)

9-1146 – One (1) Kohler emergency diesel-fired generator rated at 550 kW.

<sup>&</sup>quot;A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above."

# NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

### Table IV - 3a

9-1155 – Fourteen (14) Caterpillar diesel fired emergency generator sets, each rated at 3000 kW and equipped with Selective Catalytic Reduction (SCR) systems to control NO<sub>x</sub> emissions.

9-1156 – One (1) Caterpillar diesel fired emergency generator set rated at 800 kW.

9-1243 – One (1) Cummins diesel fired emergency generator set rated at 800 kW.

9-1244 – One (1) Cummins diesel fired emergency generator set rated at 600 kW.

9-1266 – One (1) MTU diesel fired emergency generator set rated at 750 kW.

## 3a.1 | Applicable Standards/Limits:

A. New Source Performance Standards (**NSPS**) under 40 CFR Part 60 Subpart IIII for Stationary Compression Ignition Internal Combustion Engines.

Note: Beginning October 1, 2010, installations subject to 40 CFR Part 60, Subpart IIII must comply with the diesel fuel standards of §60.4207 which limit the maximum sulfur content of the fuel to 15 ppm.

- (1) This permit is valid only for the installation of an emergency diesel generator with piston displacement less than 10 liters per cylinder.
- (2) The provisions of 40 CFR Part 60, Subpart IIII apply if the emergency diesel generator uses a diesel engine manufactured after April 1, 2006 [Ref: §60.4200].
- (3) An emergency diesel generator or diesel engine subject to the requirements of 40 CFR 60, Subpart IIII ("NSPS emergency diesel generator" or "NSPS emergency diesel engine") shall be equipped with a non-resettable hour meter [Ref: §60.4209(a)].
- (4) The Permittee shall only purchase emergency generator sets certified to meet the emission standards of §60.4205(b). The generators must be installed and configured according to the manufacturer's specifications.[Ref: §60.4211(c)]
- (5) The Permittee must purchase and install emergency generator sets certified to the emission standards for new nonroad diesel engines in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants [Ref: §62.4202(b)(2)];

# NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

#### Table IV - 3a

- (6) The requirements of condition (5) above do not apply to owners or operators of NSPS emergency diesel engines that have been modified, reconstructed, and do not apply to engines that were removed from one existing location and reinstalled at a new location [Ref: §60.4208].
- B. National Emissions Standards for Hazardous Air Pollutants (**NESHAP**) promulgated under 40 CFR 63, Subparts A and ZZZZ for Reciprocating Internal Combustion Engines

"§63.6590 - What parts of my plant does this subpart cover? This subpart applies to each affected source.

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

#### C. Operational Limits

- (1) The Permittee must operate and maintain an NSPS emergency diesel generator and control devices according to the manufacturer's written instructions or according to procedures developed by the owner or operator that are approved by the manufacturer. Additionally the Permittee may change only those settings that are permitted by the manufacturer. The Permittee must also meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they may apply to an owner or operator [Ref: §60.4211].
- (2) The Permittee must meet the non-road diesel fuel sulfur requirements of 40 CFR §80.510(b) as follows:
  - (a) Maximum sulfur content 15 ppm and
  - (b) Minimum cetane index of 40; or
  - (c) Maximum aromatic content of 35 volume percent.

[Ref: 40 CFR §60.4207(b) and §80.510(b)]

<u>Note:</u> Compliance with this requirement demonstrates compliance with COMAR 26.11.09.07A(2)(b) which limits the sulfur content of diesel fuel (No. 2 fuel oil) to 0.3 percent by weight.

(3) The Permittee must comply with the following emissions standards for the emergency generator set:

# 9800 SAVAGE ROAD

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

#### Table IV - 3a

- (a) Non-methane Hydrocarbons and NO<sub>X</sub> (NMHC+NO<sub>X</sub>): 6.4 grams per kilowatt-hour (g/kW-hr)
- (b) Carbon Monoxide (CO): 3.5 g/kW-hr
- (c) Particulate Matter (PM): 0.2 g/kW-hr

[Ref: §60.4205(b), §60.4202(b)(2), and §89.112]

Please Note: Limits met by purchasing certified engines.

- (4) The exhaust opacity from the emergency generator shall not exceed:
  - (a) 20 percent during the acceleration mode;
  - (b) 15 percent during the lugging mode; and
  - (c) 50 percent during the peaks in either the acceleration or lugging modes.

[Ref: 40 CFR §60.4205(b), §60.4202(b)(2), and §89.113]

- (5) The Permittee must use diesel fuel in the emergency generator set that meets the requirements of 40 CFR §80.510(b) (diesel fuel that has a per-gallon sulfur content that does not exceed 15 ppm, and that either has a minimum per-gallon cetane index of 40 or a maximum per-gallon aromatic content of 35 volume percent), unless a waiver is obtained from the Department and/or the EPA Administrator. [Ref: §60.4207].
- (6) In accordance with 40 CFR §60.4211(f), non-emergency use of the emergency diesel generator set for the purpose of maintenance checks and readiness testing is limited to 100 hours per year or less unless prior approval is received from the Department.

## 3a.2 | Testing Requirements:

A. NSPS

See Recording Keeping Requirements.

B. NESHAP

See NSPS Requirements.

C. Operational Limit

See Reporting Requirements.

# 3a.3 | Monitoring Requirements:

A. NSPS

See Record Keeping Requirements.

	DRAFT FART 70 OPERATING PERIMIT NO. 24-003-0317
	Table IV – 3a
	B. <u>NESHAP</u> See NSPS Requirements.
	C. <u>Operational Limit</u> See Reporting Requirements.
3a.4	Record Keeping Requirements:  Note: All records must be maintained for a period of at least 5 years.  [Reference: COMAR 26.11.03.06C(5)(g)]
	<ul> <li>A. NSPS</li> <li>(1) The Permittee shall maintain a log for the emergency generator indicating the amounts of fuel oil combusted, the hours of operation, and reason for generator operation (i.e., maintenance or operational testing, power outage, etc.). [Reference: COMAR 26.11.03.06C]</li> </ul>
	<ul> <li>(2) The Permittee shall maintain on site for the life of the source the following records for the emergency diesel generator(s):</li> <li>(a) Documentation of the manufacture date of the diesel engine, if manufactured prior to April 1, 2006 and the manufacturer model year of the diesel engine;</li> <li>(b) The installation date of each emergency diesel generator; and</li> <li>(c) The certifications of compliance or manufacturer engine test data required by 40 CFR §60.4211 and §60.4214(b).</li> </ul>
	(3) Beginning October 1, 2007, for any NSPS emergency diesel generator the Permittee shall for each fuel delivery obtain from the fuel supplier a fuel supplier certification consisting of the name of the oil supplier, the date of delivery, the amount of fuel delivered, and a statement from the fuel supplier that the diesel fuel oil complies with the specifications of 40 CFR §80.510. The Permittee shall maintain the required records on site for at least five (5) years.
	B. <u>NESHAP</u> See NSPS Requirements.
	C. <u>Operational Limit</u> : See Reporting Requirements.
3a.5	Reporting Requirements:

A. NSPS

#### Table IV - 3a

See Record Keeping Requirements.

## B. NESHAP

See NSPS Requirements.

## C. Operational Limit

The Permittee shall report the amounts of fuel oil combusted, the hours of operation, and reason for generator operation (i.e., maintenance or operational testing, power outage, etc.) to the Department in the annual emission certification report due on April 1 of each year. [Reference: COMAR 26.11.03.06C]

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

### Table IV - 3b: MACT

# 3b.0 Emissions Unit Number(s): Emergency Generators Cont'd

Emergency generators <u>not subject</u> to NSPS Subpart IIII Requirements, but are subject to 40 CFR Part 63, Subpart ZZZZ.

9-0804 – One (1) Detroit Model 12N-4002 U-12 diesel fuel emergency generator rated at 600 kW.

9-0806 – One (1) Katolight Model V-1271 diesel fuel emergency generator rated at 560 kW.

9-0818 thru 9-0823 – Six (6) Cummins/Onan diesel fuel emergency generator sets each rated at 2700 kW (Standby).

# 3b.1 Applicable Standards/Limits:

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

(a) Affected sources. (1)" ..... If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. .....".

# NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

### Table IV - 3b: MACT

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

Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this subpart.

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

# Table 2d to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

As stated in §§63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

For each	You must meet the following requirement, except during periods of startup	During periods of startup you must
CI RICE and black start	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; <sup>1</sup>	
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and	
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	

<sup>&</sup>lt;sup>1</sup>Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.

<sup>2</sup>If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

#### Table IV – 3b: MACT

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

"(a) You must be in compliance with the emission limitations and operating limitations in this subpart that apply to you at all times.

(b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source."

# 3b.2 Testing Requirements:

See Monitoring Requirements

# 3b.3 | Monitoring Requirements:

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

- "(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:
- (3) An **existing emergency** or black start stationary RICE located at an area source of HAP emissions."
- "(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed."

### Table IV - 3b: MACT

- "(h) If you operate a new, reconstructed, or **existing stationary engine**, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.
- (i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new: viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine."

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

- (a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.
- (b) You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. If you change your catalyst, you must

# Table IV - 3b: MACT

reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.

# <u>Table 6</u> to Subpart ZZZZ of Part 63—Continuous Compliance With Emission Limitations, and Other Requirements

As stated in §63.6640, you must continuously comply with the emissions and operating limitations and work or management practices as required by the following:

	Complying with the requirement	You must demonstrate
For each	to	continuous compliance by
9. Existing emergency and black start stationary RICE ≤500 HP located at a major source of HAP, existing non-emergency stationary RICE <100 HP located at a major source of HAP, existing emergency and black start stationary RICE located at an area source of HAP, existing non-emergency stationary CI RICE ≤300 HP located at an area source of HAP, existing non-emergency 2SLB stationary RICE located at an area source of HAP, existing non-emergency stationary SI RICE located at an area source of HAP which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, existing non-emergency 4SLB and 4SRB stationary RICE ≤500 HP located at an area source of HAP, existing non-emergency 4SLB and 4SRB stationary RICE >500 HP located at an area source of HAP that operate 24 hours or less per calendar year, and	Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

Table IV – 3b: MACT		
existing non-emergency 4SLB and 4SRB stationary RICE >500 HP located at an area source of HAP that are remote stationary RICE		

- "(f) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.
- (1) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).
- (i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- (4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of

#### Table IV - 3b: MACT

this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity."

# 3b.4 Record Keeping Requirements:

<u>Note:</u> All records must be maintained for a period of at least 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]

# §63.6655 - What records must I keep?

- "(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;
- (2) An existing stationary emergency RICE.
- (3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart."
- "(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) through (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

  (2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-

# emergency engines." 3b.5 Reporting Requirements:

"If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the

### Table IV – 3b: MACT

emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable." [Footnote 2 of Table 2d]

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

#### Table IV - 4

## 4.0 | Emissions Unit Number(s): 9-0449 and 9-0450

**9-0449 and 9-0450** – Paper Pulp Operation consisting of an automatic material collection system and a separate continuous operating system controlled by a baghouses.

# 4.1 Applicable Standards/Limits:

#### A. Control of Visible Emissions

**COMAR 26.11.06.02C(2)** – <u>Visible Emission Standards</u>. "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."

Exceptions. COMAR 26.11.06.02A(2). "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment if:

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

# B. Control of Particulate Matter Emissions

**COMAR 26.11.06.03B(2)(a)** – <u>Particulate Matter from Confined Sources</u>. "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)."

# C. Operational Limits:

The Permittee shall record the annual quantity of material processed by the automatic material collection system and separate continuous operating

### Table IV - 4

system and shall maintain these records for at least 5 years. [Reference: MDE Permit Condition 5of Permit No. 02-9-0449 & 0450]

# 4.2 **Testing Requirements**:

A. <u>Control of Visible Emissions</u> See Monitoring Requirements.

# B. Control of Particulate Matter Emissions

See Monitoring Requirements.

# C. Operational Limits

See Record Keeping Requirements.

# 4.3 | Monitoring Requirements:

#### A. Control of Visible Emissions

The Permittee shall conduct a monthly 1-minute visual observation of the baghouse exhaust. The visual observation must be conducted while the pulp paper operation and baghouse are in operation. If no visible emissions are observed in six consecutive monthly observations from the baghouse exhaust, the Permittee may decrease the frequency of visual observations from monthly to quarterly for the baghouse exhaust. If visible emissions are observed during any quarter visual observation, the Permittee must resume the observation of the baghouse exhaust on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly visual observations. If visible emissions are observed during any observation, the Permittee must inspect baghouse for cause of visible emission and perform necessary adjustments or repairs within 24-hours or prior to operating the pulp paper operation. If visible emissions have not been eliminated, the Permittee shall perform daily 18-minute visual observation for opacity in accordance with EPA Reference Method 9 when operating the pulp paper operation.

[Reference: COMAR 26.11.03.06C]

#### B. Control of Particulate Matter Emissions

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

# NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD FORT GEORGE G. MEADE, MD 20755-6218

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

### Table IV – 4

#### C. Operational Limits

See Record Keeping Requirements.

# 4.4 Record Keeping Requirements:

**Note:** All records must be maintained for a period of at least 5 years.

[Reference: COMAR 26.11.03.06C(5)(g)]

# A. Control of Visible Emissions

The Permittee shall maintain on site a log of the dates and results of visible emissions observations for a period of at least 5 years. [Reference: COMAR 26.11.03.06C]

### B. Control of Particulate Matter Emissions

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

## C. Operational Limits

The Permittee shall record the annual quantity of material processed by the paper pulp operation and shall maintain these records on site for at least 2 years. [Reference: COMAR 26.11.03.06C].

### 4.5 Reporting Requirements:

#### A. Control of Visible Emissions

The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4,Section III, Plant Wide Condition, "Report of Excess Emissions and Deviations"

### B. Control of Particulate Matter Emissions

See Record Keeping Requirements.

#### C. Operational Limits

The Permittee shall make records available to the Department upon request and submit records with annual Emission Certification Report. [Reference: COMAR 26.11.03.06C].

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

	Table IV – 5
5.0	Emissions Unit Number(s): 6-0375
	<b>6-0375</b> – Plating Operation consisting of surface coating of steel or aluminum parts to add durability and extend service life, controlled by a packed bed scrubber emission control system.
5.1	Applicable Standards/Limits:
	A. Control of Visible Emissions  COMAR 26.11.06.02C(2) – Visible Emission Standards. "A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers."  Exceptions. COMAR 26.11.06.02A(2). "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment if:  (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."  B. Control of Particulate Matter Emissions  COMAR 26.11.06.03B(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)."
5.2	Testing Requirements:
	A. Control of Visible Emissions     See Particulate Matter Requirements (5.3B).      B. Control of Particulate Matter Emissions     See Monitoring Requirements.
5.3	Monitoring Requirements:

# A. Control of Visible Emissions See Particulate Matter Requirements (5.3B)

## B. Control of Particulate Matter Emissions

The Permittee shall perform preventive maintenance once per month or as recommended by the equipment manufacturer on scrubbers that control emissions units. [Reference: COMAR 26.11.03.06C].

# 5.4 Record Keeping Requirements:

<u>Note:</u> All records must be maintained for a period of at least 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]

A. Control of Visible Emissions

See Particulate Matter Requirements.

## B. Control of Particulate Matter Emissions

The Permittee shall maintain a log of the maintenance performed on the scrubbers. The log shall be kept on site for at least five years and make available to the Department upon request. [Reference: COMAR 26.11.03.06C]

# 5.5 Reporting Requirements:

A. Control of Visible Emissions

See Particulate Matter Requirements.

### B. Control of Particulate Matter Emissions

See Record Keeping Requirements.

<sup>&</sup>quot;A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above."

	Table IV – 6		
6.0	Emissions Unit Number(s): 6-1114		
	6-1114 – One (1) Future Cure Model 1000 paint spray booth for miscellaneous metal coating located in the Model Shop of the SPC building.		
6.1	Applicable Standards/Limits:		

# NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

# Control of VOC Emissions

# COMAR 26.11.19.08C. Applicability and Exemptions.

- "(1) This regulation applies to a person who owns or operates:
- (a) A metal furniture coating installation; or
- (b) A metal parts and products coating operation at a premises where the total VOC emissions from all metal parts and products surface coating operations (including emissions from related cleaning activities), exceed 15 pounds (6.8 kilograms) per day."

#### D. Emission Standards.

"(1) A person subject to this regulation may not exceed the applicable VOC emission standards (expressed in terms of mass of VOC per volume of coating excluding water and exempt compounds, as applied) of the following table when applying a metal furniture coating:

Coating Type	Baked		Air-Dried	Air-Dried	
Coating Type	Lbs/gal	Kg/I	Lbs/gal	Kg/I	
General, one-component	2.3	0.275	2.3	0.275	
General, multi-component	2.3	0.275	2.8	0.340	
Extreme performance	3.0	0.360	3.5	0.420	
Metallic	3.5	0.420	3.5	0.420	
Pretreatment	3.5	0.420	3.5	0.420	
Solar absorbent	3.0	0.360	3.5	0.420	
Extreme high gloss	3.0	0.360	2.8	0.340	

(2) A person subject to this regulation may not exceed the applicable VOC emission standards (expressed in terms of mass of VOC per volume of coating excluding water and exempt compounds, as applied) of the following table when applying a metal parts and products coating:

Coating Type	Baked		Air-Dried	
Coaung Type	Lbs/gal	Kg/l	Lbs/gal	Kg/I
General, one-component	2.3	0.275	2.8	0.340
General, multi-component	2.3	0.275	2.8	0.340
Adhesion promoter	4.0	0.479	4.0	0.479
Prefabricated architectural one component and multi-component	2.3	0.280	3.5	0.420
Military specification	2.3	0.280	2.8	0.340
Extreme high-gloss; extreme performance; heat-resistant; high performance architectural; repair coating; solar absorbent; or touch up coating	3.0	0.360	3.5	0.420
Camouflage, electric-insulating varnish; etching filler; high temperature; metallic; mold-seal; pan backing; pretreatment; silicone release and vacuum-metalizing	3.5	0.420	2.8	0.420

# E. Application Methods.

#### Table IV – 6

- (1) Except as provided in §E(2) of this regulation, a person subject to the requirements of this regulation shall use the following application methods:
- (a) Electrostatic application;
- (b) HVLP spray;
- (c) Flow coat;
- (d) Roller coat;
- (e) Dip coat including electrodeposition;
- (f) Brush coat; or
- (g) A coating application method capable of achieving a transfer efficiency equivalent to or better than the efficiency achieved by HVLP spraying."

# 6.2 **Testing Requirements**:

#### Control of VOC Emissions

See Monitoring Requirements.

# 6.3 **Monitoring Requirements:**

## Control of VOC Emissions

The Permittee shall check safety data sheet (SDS) to ensure that the VOC content of metal coatings is less than the applicable standard. The SDS shall contain VOC data that is based on EPA Method 24 or equivalent. If non-compliant coatings are used, the Permittee shall maintain sufficient records to demonstrate that the emissions on that day were less than 15 pounds. [Reference: COMAR 26.11.03.06C].

# 6.4 Record Keeping Requirements:

**Note:** All records must be maintained for a period of at least 5 years.

[Reference: COMAR 26.11.03.06C(5)(g)]

#### Control of VOC Emissions

The Permittee shall maintain monthly records of the hours of spray booth operation, cleaning, and material usage on site for at least five (5) years and make available to the Department upon request. [Reference: MDE Permit Number 033-6-1114 N issued July 11, 2007]

# 6.5 | Reporting Requirements:

#### Control of VOC Emissions

The Permittee shall report material usage to the Department annually in the Emission Certification Report. [Reference: COMAR 26.11.03.06C]

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

	Table IV – 7
7.0	Emissions Unit Number(s): 6-1095
	6-1095 – Vehicle Refinishing Equipment.
7.1	Applicable Standards/Limits:
	Control of VOC Emissions
	[Reference: MDE General Permit to Construct 003-6-1095 issued
	August 28, 2006]
	Applicability: This general permit applies only to autobody repair facilities that: (1) are at a fixed stationary location; (2) Use not more than 400 gallons of vehicle refinishing material per year; (3) Have two or less paint spray booths; and (4) Do not use materials containing: (a) lead; (b) formaldehyde; or (c) pot life extenders.
	Operating Requirements
	(1) All spray painting shall be conducted exclusively by personnel who are trained and certified as painters. Existing shops (in operation before September 17, 2007) have until January 10, 2011 to comply with this requirement.
	(2) The following painting operations can be performed by non-certified painters: (a) Painting with brushes, rollers, markers or other non-atomizing applications; (b) spray painting from non-refillable hand-held aerosol containers; or (c) spray painting from guns with a paint cup size 3 oz or less.
	(3) All spray painting shall be conducted in a spray booth or preparation station.
	(4) All spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment shall be fully enclosed having four complete walls or side curtains and a full roof. Existing shops (in operation before September 17, 2007) have until January 10, 2011 to comply with this requirement.
	(5) All spray booths and preparation stations used to coat miscellaneous parts and products or vehicles subassemblies shall have at least three complete walls or side curtains and a full roof. Existing shops (in operation before September 17, 2007) have until January 10, 2011 to comply with this requirement.

# NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD

# FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

### Table IV - 7

- (6) All mobile enclosures used to perform spot repairs must enclose and, if necessary seal against the surface around the area being painted in order to ensure that paint overspray is retained within the enclosure.
- (7) All spray booths, preparation stations and mobile enclosures shall be equipped with an exhaust gas filter having at least 98% capture efficiency during all times of use. Waterwash spray booths and preparation stations that are operated and maintained according to the manufacturer's specification are exempt from this requirement.
- (8) All spray booths and preparation stations shall be ventilated through the exhaust gas filter at a negative pressure. Fully enclosed and sealed spray booths equipped with an automatic pressure balancing system may be operated at up to, but not more than 0.05 inches water gauge positive pressure.
- (9) All spray applied coatings shall be applied by HVLP spray guns, electrostatic application, airless spray guns, air-assisted airless spray guns, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed, and for which written approval has been obtained from the Administrator.
- (10) Any paint stripping preformed with a chemical paint stripper containing Methylene Chloride (MeCl) requires the following practices: (a) An evaluation of the application to determine if paint stripping is necessary; (b) An evaluation of the application to determine if another paint stripping alternative could be used; (c) Minimization of air exposure by the chemical paint stripper; (d) Optimization of application conditions; and (e) The proper storage and disposal of the chemical paint stripper.
- (11) VOC content of materials used shall not exceed the following limitations:

Coatings*	VOC (lbs/gal)
Pretreatment	6.5
Precoat	5.5
Primer Surfacer	4.8
Primer Sealer	4.6
Topcoat	5.0
Multi-stage coating system	5.2
Specialty coating	7.0
Preparation materials	
Non-plastic	1.4
Plastic	6.5
content limitation is for coating as applied.	

### Table IV - 7

- (12) Use of specialty coatings may not exceed five percent by volume of all coatings on a monthly basis.
- (13)The Permittee shall perform the following good operating practices and equipment cleanup procedures to reduce VOC emissions: (a) Establish good operating practices in writing; (b) Make the written operating practices available to the Department upon request; (c) Display the good operating practices so that they are clearly visible to the operator, or include them in operator training; (d) Provide training for equipment operators on the practices, procedures, and maintenance requirements that are consistent with equipment manufacturer's recommendations and the Permittee's experience in operating the equipment; (e) Minimize material or color changes when applying VOC coatings, whenever practical; (f) Mix or blend VOC materials in closed containers to reduce VOC emissions, as practical; (g) Maintain lids on all VOC containers when not in use; (h) Store VOC contaminated materials in closed containers; (i) Promptly contain and clean p spills and leaks of materials containing VOC; (j) Use enclosed spray gun cleaning, VOC-recycling systems and other spray gun cleaning methods; and Use detergents, high-pressure water, or other non-VOC cleaning options to clean lines, containers and equipment, where practical.

#### **Training Requirements**

- (1) All personnel, including contract personnel, who spray coatings must be trained and certified no later than 180 days after hiring. Existing shops (in operation before September 17, 2007) have until January 10, 2011 to train and certify painters.
- (2) Training and certification is valid for a period not to exceed five years after the date of training is completed.
- (3) All personnel who spray coatings must receive refresher training and be recertified every five years
- (4) The training program shall at a minimum include the following:
  - (a) A list of all personnel by name and job description who are required to be trained:
  - (b) Hand on and classroom instructions on:
    - (i) Spray gun equipment selection, setup, and operation, including measuring coating viscosity, selecting the proper fluid tip or muzzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate;

# NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD FORT GEORGE G. MEADE, MD 20755-6218

# DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

### Table IV - 7

- (ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap and reducing lead and lag spraying at the beginning and end of stroke;
- (iii) Routine spray booth and filter maintenance, including filter selection and installation; and
- (iv) Environmental compliance with the federal MACT requirements of 40 CFR part 63, subpart HHHHHH; and
- (c) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document and provide certification of successful completion of the required training.
- (5) The initial training required by this section is not required if the Permittee can show by documentation or certification that a painter's work experience and/or training has resulted in training has resulted in training required in section 4(b) above.

# 7.2 **Testing Requirements**:

<u>Control of VOC Emissions</u> See Monitoring Requirements.

# 7.3 Monitoring Requirements:

#### Control of VOC Emissions

The Permittee shall check MSDS to ensure that the VOC content of coatings is less than the applicable standard. The MSDS shall contain VOC data that is based on EPA Method 24 testing or equivalent.

[Poforogo: COMAR 26 11 03 06C]

[Reference: COMAR 26.11.03.06C].

# 7.4 Record Keeping Requirements:

<u>Note:</u> All records must be maintained for a period of at least 5 years. [Reference: COMAR 26.11.03.06C(5)(g)]

#### Control of VOC Emissions

# Recordkeeping

The following records must be kept for at least 5 years after the date of each record: (a) certification that each painter has completed the required training, with the date of the initial training and the most recent refresher training was completed; (b) documentation of the filter efficiency of any

### Table IV - 7

spray booth exhaust filter material; (c) for spray guns that are not HVLP spray guns, electrostatic application, airless spray guns, or air-assisted air less spray guns, documentation from the manufacturer that the gun achieves equivalent transfer efficiency and has received written approval by the Administrator; (d) copies of any Notifications; (e) copies of any annual reports; (f) records of any deviations from the federal requirements outlined in this permit. These records shall include: (i) the date and time period of the deviation; (ii) a description of the nature of the deviation; and (iii) the actions taken to correct the deviation; (g) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report; (h) records of usage of paint stripper containing MeCl, including: (i) Material Safety Data Sheets; and (ii) Purchase records; (i) hours of operation; and (j) Total Volume and VOC content of coatings, cleanup materials and surface preparation materials purchased.

# 7.5 Reporting Requirements:

### Control of VOC Emissions

## Notification

- (1) Initial Notification
  - (a)The Permittee must submit initial notification within 180 days after the date of the initial startup. Existing shops (in operation before September 17, 2007) have until January 10, 2011 to submit their notification.
  - (b)The initial notification shall include the following: (i) the company name; (ii) the street address (physical location) of the source; (iii) the name, title, street address, telephone number, e-mail address(if available) and signature of the owner and operator, or other certifying company official; (iv) the street address where compliance records are maintained, if different; (v) Identification of the relevant standard (40 CFR Part 63, subpart HHHHHHH); (vi) a brief description of the type of operation at this location, including the number of paint booth, number of preparation stations, and the number of painters usually employed; (vii) if there is any paint stripping performed with a paint stripper containing MeCl, the methods it is used with and the substrates tripped must be identified;
  - (c) The Permittee must include a compliance statement specifying whether the operation is in compliance with each of the requirements of the federal standard, or not; and

#### Table IV - 7

(d)If the compliance statement is that the facility is already in compliance, then the initial notification must also include a statement by a responsible official with that official's name, title, phone number, email address (if available) and signature, certifying the truth, accuracy and completeness of the notification, a statement that the source has complied with all the relevant standards of subpart HHHHHH, and that this initial notification also serves as the notification of compliance status.

(e)The initial notification shall be sent to:

United States Environmental Protection Agency Region III, Enforcement & Compliance Assurance Division Air, RCRA and Toxics Branch (3ED21) Four Penn Center 1600 John F. Kennedy Boulevard Philadelphia, PA 19103-2852

and

Maryland Department of the Environment Air and Radiation Administration, Compliance Program 1800 Washington Blvd, Suite 715 Baltimore, MD 21230

- (2) Compliance Status Notification
  - (a) A separate compliance status notification is only required for sources that do not certify compliance on their initial notification.
  - (b) The Permittee must submit a compliance status notification within 180 days after the date of initial startup, if required. Existing shops (in operation before September 17, 2007) have until March 11, 2011 to submit a compliance status notification.
  - (c) The compliance status notification shall include the following: (i) the company name; (ii) the street address (physical location of the source; (iii) the name, title, street address, telephone number, e-mail address (if available) and signature of the owner and operator, or other certifying company official; (iv) the street address where compliance records are maintained, if different; (v) a statement certifying the truth, accuracy, and completeness of notification; (vi) a statement whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation

### Table IV - 7

of any noncompliance and a description of corrective actions being taken to achieve compliance.

(d) The compliance status notification shall be sent to:
 United States Environmental Protection Agency
 Region III, Enforcement & Compliance Assurance Division
 Air, RCRA and Toxics Branch (3ED21)
 Four Penn Center
 1600 John F. Kennedy Boulevard
 Philadelphia, PA 19103-2852

and

Maryland Department of the Environment Air and Radiation Administration, Compliance Program 1800 Washington Blvd, Suite 715 Baltimore, MD 21230

# **Annual Reporting**

- (1)An Annual Notification of Changes Report must be submitted by March 1 of each calendar year;
- (2)The Annual Notification of Changes Report shall include the following: (a) the company name; (b) the street address (physical location) of the source; (c) the name, title, street address, telephone number, e-mail address (if available) and signature of the owner and operator, or other certifying company official; (d) the street address where compliance records are maintained, if different; (e) a statement certifying the truth, accuracy, and completeness of notification; (f) a statement whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance; (g) any changes to any information submitted in either the initial notification or a previous annual notification of changes report; and (h) deviations from the relevant requirements.
- (3) This report is not required if there have been no deviations from any of the relevant requirements, and no changes to any information submitted on previous reports or notifications.
- (4) The Annual Notification of Changes Report shall be sent to:

Table IV – 7				
United States Environmental Protection Agency				
Region III, Enforcement & Compliance Assurance Division				
Air, RCRA and Toxics Branch (3ED21)				
Four Penn Center				
1600 John F. Kennedy Boulevard				
Philadelphia, PA 19103-2852				
and				
Maryland Department of the Environment				
Air and Radiation Administration,				
Compliance Program				
1800 Washington Blvd, Suite 715				
Baltimore, MD 21230				

<sup>&</sup>quot;A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above."

	Table IV – 8
8.0	Emissions Unit Number(s)
	Facility-Wide
0.4	A college letter Of a college letter letter
8.1	Applicable Standards/Limits:
	Control of VOC Emissions
	A. <b>COMAR 26.11.19.02I.</b> - Good Operating Practices, Equipment
	Cleanup, and VOC Storage.
	"(1) Applicability. The requirements in this section apply to a person who
	owns or operates an installation that is subject to any requirement in this
	chapter.
	(2) Good Operating Practices. (a) A person who is subject to this section shall implement good
	operating practices to minimize VOC emissions into the
	atmosphere.
	(b) Good operating practices shall, at a minimum, include the
	following:
	(i) Provisions for training of operators on practices, procedures,
	and maintenance requirements that are consistent with the
	equipment manufacturers' recommendations and the source's
	experience in operating the equipment, with the training to include

### NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD FORT GEORGE G. MEADE, MD 20755-6218

## FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

#### Table IV - 8

proper procedures for maintenance of air pollution control equipment;

- (ii) Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use;
- (iii) As practical, scheduling of operations to minimize color or material changes when applying VOC coatings or other materials by spray gun;
- (iv) For spray gun applications of coatings, use of high volume low pressure (HVLP) or other high efficiency application methods where practical; and
- (v) As practical, mixing or blending materials containing VOC in closed containers and taking preventive measures to minimize emissions for products that contain VOC.
- (c) A person subject to this regulation shall:
- (i) Establish good operating practices in writing;
- (ii) Make the written operating practices available to the Department upon request; and
- (iii) Display the good operating practices so that they are clearly visible to the operator or include them in operator training.
- (3) Equipment Cleanup.
- (a) A person subject to this section shall take all reasonable precautions to prevent or minimize the discharge of VOC into the atmosphere when cleaning process and coating application equipment, including containers, vessels, tanks, lines, and pumps.
- (b) Reasonable precautions for equipment cleanup shall, at a minimum, include the following:
- (i) Storing all wastes and waste materials, including cloth and paper that are contaminated with VOC, in closed containers;
- (ii) Preparing written standard operating procedures for frequently cleaned equipment, including when practical, provisions for the use of low-VOC or non-VOC materials and procedures to minimize the quantity of VOC materials used;
- (iii) Using enclosed spray gun cleaning, VOC-recycling systems and other spray gun cleaning methods where practical that reduce or eliminate VOC emissions; and
- (iv) Using, when practical, detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines, containers, and process equipment.
- (4) VOC Storage and Transfer.
- (a) A person subject to this section who stores VOCs shall, at a minimum, install conservation vents or other vapor control

#### Table IV - 8

measures on storage tanks with a capacity of 2,000 gallons or more, to minimize VOC emissions.

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

# B. **COMAR 26.11.19.16B, C & D** - Control of VOC Equipment Leaks

<u>"Applicability</u>. A person subject to any VOC emission standard or limitation established in this chapter and not otherwise subject to more specific VOC leak requirements of another regulation is subject to the requirements of this regulation.

<u>General Requirements</u>. A person subject to this regulation shall comply with all of the following requirements:

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

<u>Exceptions</u>. Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be

	Table IV – 8
	repaired during operation of the source, shall be identified in the
	log and included within the source's maintenance schedule for
	repair during the next source shutdown."
8.2	Testing Requirements:
	Control of VOC Emissions
	A. See Monitoring Requirements.
	R. Soo Monitoring Poquiroments
	B. See Monitoring Requirements.
8.3	Monitoring Requirements:
	Control of VOC Emissions
	A. The Permittee shall conduct facility-wide inspections at least once
	per calendar month to determine the compliance status of facility operations with regard to implementation of "good operating"
	practices" designed to minimize emissions of VOC. [Reference:
	COMAR 26.11.03.06C]
	B. The Permittee shall visually inspect all components on the premises
	for VOC leaks at least once each calendar month following the procedures specified in COMAR 26.11.19.16. [Reference: COMAR
	26.11.19.16C(1)].
8.4	Record Keeping Requirements:
	Control of VOC Emissions
	Control of VOC Emissions  A. The Permittee shall maintain: (1) Written descriptions of all "good
	operating practices" designed to minimize emissions of VOC from
	facility-wide operations. [Reference: COMAR 26.11.19.02I]
	(2) Records of all inspections conducted to determine the facility's
	compliance status with regard to implementation of "good operating
	practices" designed to minimize emissions of VOC from facility-wide
	operations. The records shall include for each inspection the name of the inspector, the date and time of the inspection, and an account
	of the findings. [Reference: COMAR 26.11.03.06C]
	<b>5 .</b>
	B. The Permittee shall maintain a log that includes the name of the
	person conducting the inspection and the date on which leak
	inspections are made, the findings of the inspection, a list of leaks by
	tag identification number and identity of components that cannot be

#### Table IV – 8

repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation if the source. The log shall be made available to the Department upon request. Leak records, along with the log shall be maintained for a period of not less than 2 years from the date of their occurrence. [Reference: COMAR 26.11.03.06C].

### 8.5 Reporting Requirements:

#### **Control of VOC Emissions**

- A. Good operating practices information as required by COMAR 26.11.19.02I shall be made available to the Department upon request.
- B. Leak inspection logs as required by COMAR 26.11.19.16 shall be made available to the Department upon request.

<sup>&</sup>quot;A permit shield shall cover the applicable requirements identified for the emissions unit(s) listed in the table above."

#### 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. 20 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;

## [For Areas III and IV]

The <u>affected fuel burning units</u> are subject to the following requirements:

COMAR 26.11.09.05A(2), which establishes that the Permittee 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.

Exceptions: COMAR 26.11.09.05A(2) does not apply to emissions during load changing, soot blowing, start-up, 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.

#### [For Distillate Fuel Oil]

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

(2) No. <u>17</u> Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

The <u>affected units</u> are subject to the following requirements:

(A) COMAR 26.11.09.05E(2), Emissions During Idle Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.

(B) COMAR 26.11.09.05E(3), Emissions During Operating Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.

### (C) Exceptions:

- (i) COMAR 26.11.09.05E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
- (ii) COMAR 26.11.09.05E(2) does not apply to emissions resulting directly from cold engine start-up and warmup for the following maximum periods:
  - (a) Engines that are idled continuously when not in service: 30 minutes
  - (b) all other engines: 15 minutes.
- (iii) COMAR 26.11.09.05E(2) & (3) do not apply while maintenance, repair or testing is being performed by qualified mechanics.
- Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (4) 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;
- (5) No. 2 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

The <u>affected units</u> 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.
- (6) Commercial bakery ovens with a rated heat input capacity of less than 2,000,000 Btu per hour;
- (7) Confection cookers where the products are edible and intended for human consumption;
- (8) <u>✓</u> Die casting machines;
- (9) Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;
- (10) 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;

## NATIONAL SECURITY AGENCY 9800 SAVAGE ROAD

## FORT GEORGE G. MEADE, MD 20755-6218 DRAFT PART 70 OPERATING PERMIT NO. 24-003-0317

(11)	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;
(12)	Containers, reservoirs, or tanks used exclusively for:
	(a) Storage of butane, propane, or liquefied petroleum, or natural gas;
	(b) No77 Storage of lubricating oils;
	(c) No. <u>125</u> Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel;
	(d) No The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;
(13)	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;
	The five (5) Garland natural gas fired charbroilers are subject to COMAR 26.11.18.06B - Visible Emissions.  "(1) A person who owns or operates a char-broiler or pit barbecue constructed after December 17, 1974, that is located within 300 feet of the property line of any habitable dwelling manot cause or permit the discharge of emissions greater than 10 percent opacity."  "(2) A person who constructs, owns, or operates a char-broiler or pit barbeque not subject to Sec. B(1), above, may not cause or permit the discharge of emissions greater than 30 percent opacity."
	COMAR 26.11.18.06C - Control Device Requirements for New Sources Near Habitable Dwellings.  "(1) A person who construct a char-broiler or pit barbecue and is subject to Sec. B(1), above, shall install an approved control device unless the person demonstrates to the satisfaction of the

Department that the installation, when operated without control equipment, will meet Sec. B(1)."

(14)	medi	First aid and emergency medical care provided at the ty, including related activities such as sterilization and cine preparation used in support of a manufacturing or uction process;
(15)		Certain recreational equipment and activities, such as aces, barbecue pits and cookers, fireworks displays, and sene fuel use;
(16)	√ stripp	Potable water treatment equipment, not including air ping equipment;
(17)	<u>√</u>	Firing and testing of military weapons and explosives;
(18)	√ Title	Comfort air conditioning subject to requirements of VI of the Clean Air Act;
(19)	$\checkmark$	Laboratory fume hoods and vents;
(20) No. <u>1</u>		et-fed letter or lithographic printing press(es) with a cylinder n of less than 18 inches;
		Permittee is subject to the following requirements for each ng press:
		IAR 26.11.19.11E, which requires that a person who uses rial containing VOC to clean printing equipment:
		Store all waste materials containing VOC, including cloth and paper, in closed containers;
	` '	Maintain lids on all VOC-containing cleanup materials when not in use;
	` '	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.

### SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

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

#### 1. Applicable Regulations:

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

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

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

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

- (C) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T BACT) to control emissions of toxic air pollutants.
- (D) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health

#### 2. Record Keeping and Reporting:

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

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



# NATIONAL SECURITY AGENCY CENTRAL SECURITY SERVICE

FORT GEORGE G.MEADE, MARYLAND 20755-6218

January 26, 2024

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

Dear Ms. Gurley:

The National Security Agency is submitting three copies of a renewal application for Part 70 Operating Permit No. 24-003-00317. The application includes all registered sources at the Fort George G. Meade campus that support the principle activity under standard industrial classification code 9711. As under the current Part 70 Operating Permit, the renewal application does not include registered sources conducting other industrial activities, per guidance from the USEPA Office of Air Quality and Planning Standards for military installations (memorandum from John S. Seitz dated August 2, 1996). Those registered sources not included are as follows:

- 9-0442 Building 9700 Life/Safety Generator
- 6-0720 Circuit Board Assembly
- 6-0717 Building 9700 Paint Spray Booth
- 5-0674 APC Boiler
- 5-0890 Building 9700 Boiler

Over the course of the current Part 70 Operating Permit, several registered sources have been removed from service, and therefore were not included in this renewal application. Those closed sources are as follows:

- 5-7025 through 5-7028 Four (4) Hydrotherm KN-20 natural gas-fired boilers, each rated at 1.5 million Btu per hour heat input
- 9-0807 One (1) Detroit (Model 8V92TA) diesel fuel emergency generator rated at 643 BHP
- 9-0968 One (1) Katolight (Model 415-J6T3) diesel fuel emergency generator rated at 415 kW
- 8-0155 One (1) Magikitch'n natural gas-fired charbroiler

Additionally, over the course of the current Part 70 Operating Permit, several registered sources have been added to service, and therefore was included in this renewal application. Those added sources are as follows:

5-0900 – Two (2) Hydrotherm KN-20 natural gas-fired boilers each rated at 1.99 million BTU per hour

- 5-0891 One (1) Hydrotherm KN-20 natural gas-fired boilers rated at 1.99 million BTU per hour
- 5-0892 One (1) Hydrotherm KN-20 natural gas-fired boilers rated at 1.99 million Btu per hour heat input
- 5-0905 Four (4) Patterson Kelly natural gas-fired boilers each rated at 4.0 million Btu per hour heat input
- 5-0911 -Three (3) Lochinvar natural gas-fired boilers each rated at 1.5 million Btu per hour heat input
- 9-1243 One (1) Cummins diesel-fired emergency generator rated at 800 kW
- 9-1244 One (1) Cummins diesel-fired emergency generator rated at 600 kW
- 8-0363 Four (4) Garland Radiant natural gas-fired charbroilers

The Permit Shield under COMAR 26.11.03.23 has been requested for each Emissions Unit, indicating that the National Security Agency is in compliance with the Federally Enforceable conditions of the permit.

This application contains national security information, which although not classified, is protected from release under Section 6 of the National Security Agency Act of 1959 (50 U.S.C. Section 402 note). The information is to be used on a "need-to-know" basis by Maryland Department of the Environment employees only. The information may not be released without prior written permission of the Director, National Security Agency.

If you have any questions or concerns, please contact me at srschu2@nsa.gov or (443) 479-0442. Thank you for your time and assistance in this matter.

- Schutt

Sincerely,

Samantha Schutt Environmental Engineer

Enclosures

1800 Washington Boulevard • Suite 720 • Baltimore, Maryland 21230-1720 410-537-3000 • 800-633-6101 • http://www.mde.state.md.us

Air and Radiation Administration • Air Quality Permits Program

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

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

Section 1-203(b).

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

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

Current MDE License/Permit No.: 24-003-0317	
Name of Licensee or Permit Holder: National Security	Agency
Address: 9800 Savage Road	
Fort George G Meade, Maryland 20755-621	8
Contact Name: Samantha Schutt	Title: Environmental Engineer
Contact Telephone Number: 301-688-2970	- N
Privacy Act Notice: This Notice is provided pursuant to the Federal Privacy Act Social Security or Federal Tax Identification on this form is mandatory pursuant Environment Article, <u>Annotated Code of Maryland</u> , which requires MDE to verificate all undisputed taxes and unemployment insurance. Social Security and Federal purposes other than those described in this Notice.  Federal Employer Identification Number (FEIN): 53-02	to the provisions of § 1-203 (2003) of fy that an applicant for a permit or license has eral Tax Identification Nos. will not be used for
Certification: I certify that the above information is true and	correct to the best of my knowledge.  01   25   2024  Date

Date: October 1, 2018 TTY Users: 800-201-7165

#### 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: National Security Agency		
Street Address: 9800 Savage Road,	Suite 6218	
City: Fort Meade	State: MD	Zip Code: 20755-6218
Telephone Number 301-688-2970		Fax Number

#### **Facility Information:**

Name of Facility:		
National Security Agency	7	
Street Address:		
9800 Savage Road, Suite	6218	
City:	State:	Zip Code:
Fort Meade	MD	20755-6218
Plant Manager:	Telephone Number:	Fax Number:
Randy Westfall	301-688-2970	
24-Hour Emergency Telephone Number for Air Pollution Matters:		
301-688-6911 Security Op	erations Center	

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

Form Number: MDE/ARMA/PER.020 Page 1 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 1 of <u>52</u>

#### **SECTION 1. CERTIFICATION STATEMENTS**

# 1. Compliance Status with Applicable Enhanced Monitoring and Compliance Certification Requirements

The emissions units identified in this application are in compliance with applicable enhanced monitoring and compliance certification requirements.

# 2. Certification of Current Compliance with All Applicable Federally Enforceable Requirements

Except for the requirements identified in Section 7 of this application, for which compliance is not achieved, I hereby certify, based on information and belief formed after reasonable inquiry, that the facility is currently in compliance with all applicable federally enforceable requirements and agree that the facility will continue to comply with those requirements during the permit term.

You must complete a Section 7 form for each non-complying emissions unit.

# 3. Statement of Compliance with Respect to All New Applicable Requirements Effective During the Permit Term

I hereby state, based on information and belief formed after reasonable inquiry, that the facility agrees to meet, in a timely manner, all applicable federally enforceable requirements that become effective during the permit term, unless a more detailed schedule is expressly required by the applicable requirement.

### 4. Risk Management Plan Compliance

I hereby certify that, based on information and belief formed after reasonable inquiry, that a Risk Management Plan as required under 112(r) of the Clean Air Act:

[	] has been submitted;
[	] will be submitted at a future date; or
ĮΧ	Il does not need to be submitted.

Form Number: MDE/ARMA/PER.020 Page 2 of 16

#### 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:	01-25-2024
SIGNATURE	DATE
	Randy Westfall
	PRINTED NAME
i.	Chief, Installations & Logistics
	TITLE

Form Number: MDE/ARMA/PER.020 Page 3 of 16

#### 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).
9711 - National Security

#### 2. Facility-Wide Emissions

- A. This facility is required to obtain a Part 70 Operating Permit because it is: Check appropriate box:

  - ☐ Potential Major
  - □ Solid Waste Incineration Unit Requiring Permit Under § 129(e) of CAA
- B. List the actual facility-wide emissions below: tons per year

PM10 1.8 NOx 19.8 VOC 3.3 SOx 0.6 CO12.8 HAPs 0.05

#### 3. Include With the Application:

Flow Diagrams showing all emissions units, emission points, and control devices: See Appendix A

Emissions Certification Report (copy of the most recent submitted to the Department.) See Appendix B

Compliance Assurance Monitoring Plan; See Appendix C

Form Number: MDE/ARMA/PER.020 Page 4 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 4\_\_ of <u>52\_\_</u>

## SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: Boilers	> 10MM BTU/hr	2. MDE Registration No.:(if applicable)
1a. Date of installation (month/year and December/1969(1)	r):January/1953(3)	5-0502, 5-0503, 5-0504, 5-0505
*		nission point(s) and the assigned number(s):  No. 2 fuel oil-fired boilers
each rated at 85 millio	n BTU per hour.	Each boiler vents to a
separate stack, identif	ied as emission po	oints 9807-1, 9807-2 and
9807-3.		
One (1) Keeler natural	gas & No. 2 fuel o	oil-fired boiler rated at
90 million BTU per hour	. Boiler vents to	o a separate stack,
identified as emission	point 9807-4.	
4. Federally Enforceable Limit on t	the Operating Schedule for	this Emissions Unit:
General Reference:		
Continuous Processes:	hours/day	days/year
Batch Processes:	hours/batch	batches/day
	days/year	
-	day5/year	
5. Fuel Consumption:	0/ 0 10	A 111 ( 'C 'A)
Type(s) of Fuel 1. No. 2 fuel oil	% Sulfur <15 ppm	Annual Usage (specify units) 3,927 gal
2. Natural gas	N/A	193 million cf
6. Emissions in Tons:		
		X (note: before control device)
B. Actual Emissions:	NOx_11.7_ SOx0.5	VOC 0.7 PM10 0.5 HAPs 0

Form Number: MDE/ARMA/PER.020 Page 5 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 5 of 52

Recycled Paper

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

Emissions Unit No.: Boilers>10MMBTU/hrGeneral Reference: COMAR 26.11.09.05A

Briefly describe the Emission Standard/Limit or Operational Limitation:  No discharge of visible emissions, other than water in an uncombined	
form, except during load changing, soot blowing, startup, or	_
adjustments if not greater than 40% opacity and does not occur for	_
more than 6 consecutive minutes in any sixty minute period.	-
Permit Shield Request: Yes	_
Compliance Demonstration:	
Check appropriate reports required to be submitted:  Quarterly Monitoring Report:  X Annual Compliance Certification:  X Semi-Annual Monitoring Report:	
Methods used to demonstrate compliance:	
Monitoring: Reference 26.11.03.06C Describe: Properly operate and maintain the boilers in a manner to prevent visible emissions and during burning of No. 2 Fuel Oil, perform a visible observation for a 6-minute period once for each 168 hours that the boilers burns oil or at least 1/year.	
Testing: Reference Describe:	
Record Keeping: Reference 26.11.03.06C Describe: Maintain an operation manual and prevention maintenance plan; maintain combustion performance	
maintenance records; maintain a visible emissions observation log; and	
maintain records of the hours that No. 2 Fuel Oil is burned.	
Reporting: Reference 26.11.01.07 Describe: Report incidents of visible emissions in accordance with "Report of Excess Emissions and	
Deviations" plant wide conditions.	

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16 Revision Date 4/29/03

6 of <u>52</u>

TTY Users 1-800-735-2258

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

Emissions Unit No.: Boilers>10MMBTU/hrGeneral Reference: COMAR 26.11.09.07A(2)

Briefly describe the Emission Standard/Limit or Operational Limitation:  No burning of Distillate fuel oils with a sulfur content by weight  in excess of or which otherwise exceeds 0.3%.
Permit Shield Request: Yes
Compliance Demonstration:
Check appropriate reports required to be submitted:  Quarterly Monitoring Report:  X Annual Compliance Certification:  X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference 26.11.03.06C Describe: Obtain a certification from the fuel supplier indicating that the oil complies with the limitation on the sulfur content of the fuel oil.
Testing: Reference Describe:
Record Keeping: Reference 26.11.03.06C Describe: Maintain records of fuel supplier's certification.
Reporting: Reference Describe:

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16 Revision Date 4/29/03

TTY Users 1-800-735-2258

7 of <u>52</u>

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

Emissions Unit No.: Boilers>10MMBTU/hrGeneral Reference: COMAR 26.11.09.08

Briefly describe the Emission Standard/Limit or Operational Limitation:

Perform a combustion analysis for each boiler at least once per year
and train boiler operators on combustion optimization once every
3 years.
Permit Shield Request: Yes
Compliance Demons tration:
Check appropriate reports required to be submitted:
Quarterly Monitoring Report:
X Annual Compliance Certification:
X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference 26.11.03.06C Describe: Optimize combustion based on the
annual combustion analysis.
Testing Deference 26, 11, 00, 00E(2). Describe Develorm a genburghian analysis
<u>Testing: Reference</u> 26.11.09.08E(2) Describe: <u>Perform a combustion analysis</u> once per year.
Record Keeping: Reference 26.11.09.08E Describe: Maintain records of the results
of the annual combustion analysis and records of the combustion
optimization training attendance for each operator.
Reporting: Reference Describe:
Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 <u>8</u> of <u>52</u>

Recycled Paper

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

Emissions Unit No.: Boilers>10MMBTU/hr General Reference: COMAR 26.11.02.09A

Permit Shield Request: Yes
Compliance Demonstration:
Check appropriate reports required to be submitted:  Quarterly Monitoring Report:  X Annual Compliance Certification:  X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference Describe:
Testing: Reference Describe:
Record Keeping: Reference 26.11.02.19 C Describe: Maintain records of the quantity and types of fuel burned.
Reporting: Reference 26.11.01.05-1 Describe: Submit records of the quantity and type of fuels burned with the annual emissions certification report.

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

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

Emissions Unit No.: Boilers > 10 MMBTU/hr General Reference: 40 CFR 63 Subpart JJJJJJ

	Standard/Limit or Operational Limitation: e-up and a one-time energy assessment.
Permit Shield Request: Yes	
Compliance Demonstration:	
Check appropriate reports  Quarterly Monitorin  X Annual Compliance  X Semi-Annual Monit	<del>-</del>
Methods used to demonstrate con	npliance:
	Describe:
	Describe: Conduct biennial boiler tune-up.
concentrations of CO in tune-up, description of	R63.11223 Describe: Maintain on-site report containing the effluent stream, percent Oxygen before and after corrective actions taken and the type and amount of 2 months.
Reporting: Reference	Describe:

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 \_10\_of \_52\_

Recycled Paper

#### SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

<ol> <li>Emissions Unit No.:Boilers</li> <li>Date of installation (month/year</li> </ol>	۵)،	2. MDE Registration No.:(if applicable) 5-0644, 5-0645, 5-0900, 5-0891,
December/2010, September/20		5-0892, 5-0809, 5-0810, 5-0811
		mission point(s) and the assigned number(s):
-		
Two (2) Lochinvar Power Fi		identified as emission points
9900-4 and 9900-5.	riion bio per nour,	identified as emission points
Four (4) Hydrotherm KN-20 naturalgas-fired boilers each rated at 1.99 million BTU per hour, identified as emission points 9960-1 thru 4.		
Four (4)Lochinvar natural	gas-fired boilers	each rated at 1.5 million
BTU per hour, identified a	as emission points	9220-1 thru 4.
Four (4) Harsco natural gas	s-fired boilers eac	h rated at 2.5 million BTU,
identified as emission pos		
		rated at 2.0 million BTU,
identified as emission por	int 9230-5 and 9230	-6.
4. Federally Enforceable Limit on t	he Operating Schedule for	this Emissions Unit:
General Reference:		
Continuous Processes:	hours/day	days/year
Batch Processes:	hours/batch	
	nound outen	batches/day
_	days/year	batches/day
5. Fuel Consumption:	days/year	
Type(s) of Fuel	days/year % Sulfur	Annual Usage (specify units)
Type(s) of Fuel 1. Natural gas	days/year  % Sulfur N/A	Annual Usage (specify units) 25 million cf
Type(s) of Fuel	days/year  % Sulfur N/A	Annual Usage (specify units) 25 million cf
Type(s) of Fuel 1. Natural gas	days/year  % Sulfur N/A	Annual Usage (specify units) 25 million cf
Type(s) of Fuel  1. Natural gas  2.  3.	days/year  % Sulfur N/A	Annual Usage (specify units) 25 million cf
Type(s) of Fuel  1. Natural gas  2.  3.  6. Emissions in Tons:	days/year  % Sulfur N/A	Annual Usage (specify units) 25 million cf
Type(s) of Fuel  1. Natural gas  2.  3.  6. Emissions in Tons:  A. Actual Major:	days/year  % Sulfur N/A  Potential Major:	Annual Usage (specify units) 25 million cf  (note: before control device)
Type(s) of Fuel  1. Natural gas  2.  3.  6. Emissions in Tons:  A. Actual Major:	days/year  % Sulfur N/A  Potential Major:	Annual Usage (specify units) 25 million cf

Form Number: MDE/ARMA/PER.020 Page 5 of 16

## SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.:Boilers <=	=10MM BTU/hr	2. MDE Registration No.:(if applicable)
1a. Date of installation (month/year):	See nage 11	5-0823, 5-0842, 5-0905, 5-0911
,	see page II	
3. Detailed description of the emissio	ns unit, including all er	mission point(s) and the assigned number(s):
Three (3)Lochinvar natural gas-	-fired boilers each	rated at 1.5 million BTU,
identified as emission points 9	9225-1 thru 3.	
Four (4) Lochnivar natural gas-	-fired boilers each	rated at 4.0 million BTU,
identified as emission points 9	9250-1 thru 4.	
Four (4) Patterson Kelly natura	al gas-fired boiler	s each rated at 4.0 million BTU,
identified as emission points 9	9245-1 thru 4.	
Three (3) Lochinvar natural gas	s-fired boilers eac	h rated at 4.0 million BTU,
identified as emission points	9715-1 thru 3.	
4. Federally Enforceable Limit on the	Operating Schedule for	this Emissions Unit:
4. Federally Enforceable Limit on the General Reference:	Operating Schedule for	this Emissions Unit:
, and the second se	Operating Schedule for hours/day	
General Reference:		days/year
General Reference:  Continuous Processes:	hours/day	days/year
General Reference:  Continuous Processes:  Batch Processes:	hours/day hours/batch	days/year
General Reference:  Continuous Processes:  Batch Processes:  5. Fuel Consumption: Type(s) of Fuel	hours/day hours/batch	days/year
General Reference:  Continuous Processes:  Batch Processes:  5. Fuel Consumption:     Type(s) of Fuel  1. See page 11.	hours/day hours/batch days/year  % Sulfur	days/year batches/day
General Reference:  Continuous Processes:  Batch Processes:  5. Fuel Consumption:     Type(s) of Fuel 1. See page 11. 2.	hours/day hours/batch days/year  % Sulfur	days/year batches/day
General Reference:  Continuous Processes:  Batch Processes:  5. Fuel Consumption:     Type(s) of Fuel  1. See page 11.	hours/day hours/batch days/year % Sulfur	days/yearbatches/day  Annual Usage (specify units)
General Reference:  Continuous Processes:  Batch Processes:  5. Fuel Consumption:     Type(s) of Fuel 1. See page 11. 2.	hours/day hours/batch days/year % Sulfur	days/yearbatches/day  Annual Usage (specify units)
General Reference:  Continuous Processes:  Batch Processes:  5. Fuel Consumption:     Type(s) of Fuel 1. See page 11. 2. 3. 6. Emissions in Tons: See page 11	hours/dayhours/batchdays/year  % Sulfur	days/yearbatches/day  Annual Usage (specify units)
General Reference:  Continuous Processes:  Batch Processes:  5. Fuel Consumption:     Type(s) of Fuel 1. See page 11. 2. 3. 6. Emissions in Tons: See page 11     A. Actual Major:	hours/day hours/batch days/year % Sulfur Potential Major:_	days/yearbatches/day  Annual Usage (specify units)

Form Number: MDE/ARMA/PER.020 Page 5 of 16

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

Emissions Unit No.: Boilers <=10MM BTU/hr General Reference: COMAR 26.11.09.05A

Briefly describe the Emission Standard/Limit or Operational Limitation:  No discharge of visible emissions, other than water in an uncombined
form, except during load changing, soot blowing, startup, or
adjustments if not greater than 40% opacity and does not occur for
more than 6 consecutive minutes in any sixty minute period.
Permit Shield Request: Yes

## **Compliance Demonstration:**

Check appropriate reports required to be submitted:
Quarterly Monitoring Report:
X Annual Compliance Certification:
X Semi-Annual Monitoring Report:

Methods used to demonstrate compliance:	
Monitoring: Reference Describe:	
Testing: Reference Describe:	
Record Keeping: Reference Describe:	
Reporting: Reference 26.11.01.07 Describe: Report incidents of visible	
emissions in accordance with "Report of Excess Emissions and	
Deviations" plant wide conditions.	

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16 Revision Date 4/29/03

TTY Users 1-800-735-2258

<u>13</u> of <u>52</u>

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

Emissions Unit No.: Boilers <=10MM BTU/hr General Reference: COMAR 26.11.09.08D(5)

Briefly describe the Emission Standard/Limit or Operational Limitation:  Triennial Operator Training in NOx Control and develop an operations and
maintenance plan for space heaters.
Permit Shield Request: Yes
Compliance Demonstration:
Check appropriate reports required to be submitted:  Quarterly Monitoring Report:  X Annual Compliance Certification:  X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference 26.11.09.08F(1) (b) Describe: Develop and maintain an operations and maintenance plan.
Γesting: Reference Describe:
Record Keeping: Reference 26.11.09.08 Describe: Keep records of maintenance activity, maintain operator training records, keep a record of the operations and maintenance plan, and keep records to evaluates the validity of the space heater designation.
Reporting: Reference 26.11.09.08F(1)(e) Describe: Provide training program attendance records to Department upon request.

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

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

Emissions Unit No.: Boilers <=10MM BTU/hr General Reference: COMAR 26.11.02.19C

Only burn natural gas.
Permit Shield Request: Yes
Compliance Demonstration:
Check appropriate reports required to be submitted:  Quarterly Monitoring Report:  X Annual Compliance Certification:  X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference Describe:
Testing: Reference Describe:
Record Keeping: Reference 26.11.02.19 C Describe: Maintain records of the quantity and types of fuel burned.
Reporting: Reference 26.11.01.05-1 Describe: Submit records of the quantity and type of fuels burned with the annual emissions certification report.

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

### SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: Emergency Generators	2. MDE Registration No.:(if applicable)
<pre>1a. Date of installation (month/year): Various    (Listed on emission calculation sheets.)</pre>	9-0804, 9-0806, 9-0918, 9-0967, 9-1090
3. Detailed description of the emissions unit, including all emis	ssion point(s) and the assigned number(s):
One (1) Detroit Diesel Model 12N-4002 U-12 diesel emer	gency generator rate at 600 kW with
exhaust point 3900-1.	
One (1) Katolight Model V-1271 diesel emergency genera	tor rated at 560 kW, with exhaust point
9960-3.	
One (1) Katolight Model D900X6T2 diesel emergency gene	rator rated at 900 kW, with exhaust
point 9840-1.	
One(1) Katolight Model 415-J6T3 diesel emergency gener	ator rated at 415 KW, with exhaust
points VCC-1.	
One(1) MTU Onsite Energy diesel emergency generator ra	ted at 2,280kW, with exhaust point
9800C-1.	
4. Federally Enforceable Limit on the Operating Schedule for	r this Emissions Unit:
4. Federally Enforceable Limit on the Operating Schedule for General Reference: Various - Listed in Section 3B	r this Emissions Unit:
	this Emissions Unit:days/year
General Reference: Various - Listed in Section 3B	days/year
General Reference: Various - Listed in Section 3B  Continuous Processes: hours/day	days/year
General Reference: Various - Listed in Section 3B  Continuous Processes:hours/day  Batch Processes:hours/batch	days/year
General Reference: Various - Listed in Section 3B  Continuous Processes:hours/day  Batch Processes:hours/batch    days/year  5. Fuel Consumption:     Type(s) of Fuel  % Sulfur	days/yearbatches/day  Annual Usage (specify units)
General Reference: Various - Listed in Section 3B  Continuous Processes:hours/day  Batch Processes:hours/batch    days/year  5. Fuel Consumption:     Type(s) of Fuel	days/year batches/day
General Reference: Various - Listed in Section 3B  Continuous Processes:hours/day  Batch Processes:hours/batch    days/year  5. Fuel Consumption:     Type(s) of Fuel  % Sulfur	days/yearbatches/day  Annual Usage (specify units)
General Reference: Various - Listed in Section 3B  Continuous Processes:hours/day  Batch Processes:hours/batch    days/year  5. Fuel Consumption:     Type(s) of Fuel	days/yearbatches/day  Annual Usage (specify units)
General Reference: Various - Listed in Section 3B  Continuous Processes:hours/day  Batch Processes:hours/batch	days/yearbatches/day  Annual Usage (specify units)
General Reference: Various - Listed in Section 3B  Continuous Processes:hours/day  Batch Processes:hours/batch    days/year  5. Fuel Consumption:days/year  5. Fuel Consumption:	days/yearbatches/day  Annual Usage (specify units) 316,350 gallons
General Reference: Various - Listed in Section 3B  Continuous Processes:hours/day  Batch Processes:hours/batch	days/yearbatches/day  Annual Usage (specify units) 316,350 gallons (note: before control device)

Form Number: MDE/ARMA/PER.020 Page 5 of 16

## SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: Emergency (continued)	y Generators	2. MDE Registration No.:(if applicable) 9-1035, 9-0818, 9-0819, 9-0820,
1a. Date of installation (month/yea (Listed on emission calc	′	9-0821, 9-0822, 9-0823,9-1055 9-1091, 9-1092
3. Detailed description of the emissi	ons unit, including all emis	ssion point(s) and the assigned number(s):
Eighteen (18) Cummins diesel emergency generators each rated at 2,750 kW and each equipped		
with SCR systems, with exhaust points SCEUP-1 thru SCEUP-18		
Six (6) Cummins/Onan diesel emergency generators each rated 2700 kW, with exhaust points		
SCEUP-19 thru 24.		
Twenty-four (24) Caterpillar di	esel emergency generato	rs each rated at 2,725 kW and each
equipped with SCR systems, with	exhaust points NCEUP-1	thru NCEUP-24.
Seven (7) Caterpillar diesel eme	rgency generators each	rated at 3000kW and each equipped with
SCR systems, with exhaust point	s ECEUP-1 thru ECEUP-7.	
One (1) Caterpillar diesel emerg	ency generator rated at	1000kW, with exhaust point 9000-1.
4. Federally Enforceable Limit on t	the Operating Schedule for	this Emissions Unit:
General Reference: See page	16	
Continuous Processes:	hours/day	days/year
Batch Processes:	hours/batch	batches/day
-	days/year	
5. Fuel Consumption: See page Type(s) of Fuel 1.	16 % Sulfur	Annual Usage (specify units)
2		
3		
6. Emissions in Tons: See page 16		
A. Actual Major:	Potential Major:_	(note: before control device)
B. Actual Emissions:	NOxSOx	VOCPM10 HAPs

Form Number: MDE/ARMA/PER.020 Page 5 of 16

#### SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: Emergency	y Generators	2. MDE Registration No.:(if applicable)		
1a. Date of installation (month/yea (Listed on emission calc	′	9-1116, 9-1117, 9-1136, 9-1137, 9-1146, 9-1155, 9-1156		
3. Detailed description of the emissi	ons unit, including all emis	ssion point(s) and the assigned number(s):		
Six (6)Caterpillar diesel emerge	ency generators each rat	ed at 3000kW and each equipped with		
SCR systems, with exhaust points ECEUP-8 thru ECEUP-13.				
Two (2) Caterpillar diesel emergency generators rated at 500kW each, with exhaust point 9230-1				
and 9220-1.				
One (1) Caterpillar diesel emergency generator rated at 3000kW, with exhaust point 9225-1.				
One (1) Caterpillar diesel emergency generator rated at 400kW, with exhaust point 9225-2.				
One (1) Kohler diesel emergency	generator rated at 550k	W, with exhaust point 9210-1.		
Fourteen (14)Caterpillar diesel	emergency generators ea	ch rated at 3000kW and each equipped		
with SCR systems, with exhaust p	points ECEUP-14 thru ECE	UP-27.		
One (1) Caterpillar C 175-16 die	esel emergency generator	rated at 850kW, with exhaust point		
9250-1.				
4. Federally Enforceable Limit on	the Operating Schedule for	this Emissions Unit:		
General Reference: See page	16			
Continuous Processes:	hours/day	days/year		
Batch Processes:	hours/batch	batches/day		
-	days/year			
5. Fuel Consumption: See page Type(s) of Fuel	16 % Sulfur	Annual Usage (specify units)		
1				
2				
2. 3.				
3				
3. 6. Emissions in Tons: See page	16	(note: before control device)		

Form Number: MDE/ARMA/PER.020 Page 5 of 16

#### SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: Emergency (continued)  1a. Date of installation (month/yea (Listed on emission calc	u <b>r):</b> Various	2. MDE Registration No.:(if applicable) 9-1243, 9-1244
	ions unit, including all emis	
4. Federally Enforceable Limit on General Reference:  See page	16	
Continuous Processes:	hours/day	days/year
Batch Processes:	hours/batch	batches/day
-	days/year	
5. Fuel Consumption: See page Type(s) of Fuel 1. 2.	% Sulfur	Annual Usage (specify units)
3		
6. Emissions in Tons: See page A. Actual Major:		(note: before control device)
		VOCPM10 HAPs

Form Number: MDE/ARMA/PER.020 Page 5 of 16

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

Emissions Unit No.: Emergency Generators General Reference: COMAR 26-11.09-05E

Briefly describe the Emission Standard/Limit or Operational Limitation:  No discharge of visible emissions greater than 10% opacity during
idle mode or greater than 40% opacity during operation at other than
idle conditions, with exceptions for start-up, clearing exhaust,
maintenance, repair or testing by qualified mechanics.
Permit Shield Request: Yes

## **Compliance Demons tration:**

Check appropriate reports required to be submitted:

X Annual Compliance Certification:

Quarterly Monitoring Report:

X Semi-Annual Monitoring Report:

Methods used to demonstrate compliance:
Monitoring: Reference 26.11.03.06C Describe: Properly operate and maintain the generators in a manner to minimize visible emissions.
Testing: Reference Describe:
Record Keeping: Reference 26.11.03.06 C Describe: Maintain records of preventive maintenance on-site for at least five years.
Reporting: Reference 26.11.01.07 Describe: Report incidents of visible emissions in accordance with "Report of Excess Emissions and Deviations" plant wide conditions.

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16 Revision Date 4/29/03

Revision Date 4/29/03 TTY Users 1-800-735-2258 <u>20</u> of <u>52</u>

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

 $\underline{\textbf{Emissions Unit No.:}} \ \underline{\textbf{Emergency Generators}} \ \underline{\textbf{General Reference:}} \ \underline{\textbf{COMAR}} \ 26.11.09.07 \underline{\textbf{A}} \ (2)$ 

Briefly describe the Emission Standard/Limit or Operational Limitation:  No burning of Distillate fuel oils with a sulfur content by weight
in excess of or which otherwise exceeds 0.3%.
Permit Shield Request: Yes
Compliance Demonstration:
Check appropriate reports required to be submitted:
Quarterly Monitoring Report:
<ul> <li>X Annual Compliance Certification:</li> <li>X Semi-Annual Monitoring Report:</li> </ul>
Semi-Amidai Womoring Report.
Methods used to demonstrate compliance:
Monitoring: Reference 26.11.03.06C Describe: Obtain a certification from the fuel supplier indicating that the oil complies with the limitation
on the sulfur content of the fuel oil.
Testing: Reference Describe:
Record Keeping: Reference 26.11.09.07C Describe: Retain fuel supplier
certifications for at least five (5) years.
Reporting: Reference 26.11.09.07C Describe: Report annual fuel supplier certification to the Department upon request.
es ene separement apon request.

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

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

Emissions Unit No.: Emergency Generators General Reference: COMAR 26.11.09.08G

Briefly describe the Emission Standard/Limit or Operational Limitation:

Perform a combustion analysis on each generator that operates more
than 500 hours in a calendar year and train operators on combustion
optimization every three (3) years.
Permit Shield Request: Yes
Compliance Demonstration:
Check appropriate reports required to be submitted:  Quarterly Monitoring Report:  X Annual Compliance Certification:  X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference 26.11.03.06C Describe: Perform a combustion analysis and optimize combustion at least annually for any engine that operates more than 500 hours during a calendar year.  Testing: Reference 26.11.09.08G(1) (b) (c) Describe: Perform a combustion analysis and optimize combustion at least annually for any engine that operates more than 500 hours during
a calendar year.
Record Keeping: Reference 26.11.09.08G Describe: Maintain records of the results of the combustion analyses for at least five (5) years.
Reporting: Reference Describe:

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

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

Emissions Unit No.: Emergency Generators General Reference: COMAR 26.11.09.08G

Briefly describe the Emission Standard/Limit or Operational Limitation:  Provide certification of the capacity factor of the equipment to the Department
in writing.
Permit Shield Request: Yes
Compliance Demonstration:
Check appropriate reports required to be submitted:
Quarterly Monitoring Report:
X Annual Compliance Certification:
X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference 26.11.03.06C Describe: Calculate the capacity factor of the combustion turbine within 30 days after the end of each month.
Testing: Reference Describe:
Record Keeping: Reference 26.11.09.08G(1)(c) Describe: Maintain a record of the calculated capacity factor.
Reporting: Reference 26.11.03.06C Describe: Provide certification of the capacity factor of the equipment to the Department in writing as part of the April 1 certification report.

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

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

Emissions Unit No.: Emergency Generators General Reference: COMAR 26.11.09.08G

Require each operator of an installation, except combustion turbines, to attend

Briefly describe the Emission Standard/Limit or Operational Limitation:

operator training programs at least once every 3 years, on combustion optimization
and maintain a record of training program attendance for each operator at the site.
Permit Shield Request: Yes
Compliance Demonstration:
Check appropriate reports required to be submitted:
Quarterly Monitoring Report:  X Annual Compliance Certification:
X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference Describe:
Testing: Reference Describe:
Record Keeping: Reference 26.11.09.08G(e) Describe: Maintain record of training program attendance for each operator on site for at least five years and make the records available to the
Department upon request.
Reporting: Reference 26.11.09.08G(e) Describe: Submit a list of trained operators to the Department upon request.
Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16 Revision Date 4/29/03

TTY Users 1-800-735-2258

24 of <u>52</u>

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

Emissions Unit No.: Emergency Generators General Reference: MDE PTC Condition D2 Registration #'s:9-0818 thru 9-0823

Briefly describe the Emission Standard/Limit or Operational Limitation:

Each of the six (6) emergency generator sets shall not operate more than
125 hours a year, unless that source obtains a prior approval from the
Department.
Permit Shield Request: Yes
Compliance Demonstration:
Check appropriate reports required to be submitted:
Quarterly Monitoring Report:
X Annual Compliance Certification:
X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
<u> </u>
Monitoring: Reference 26.11.03.06C Describe: Log the number of hours each generator
is operated on a daily basis for generator preventative maintenance.
Testing: Reference Describe:
Record Keeping: Reference MDE PTC Condition E1 Describe: Maintain records of preventative
maintenance testing operation, utility provider-requested operation, and
emergency operation hours and fuel usage on a daily basis and on-site for at least
five (5) years.
Reporting: Reference MDE PTC Condition El Describe: Submit a record of the hours of
operation, fuel used, and emission estimates for each emergency generator with
the annual Emissions Certification Report.

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

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

Emissions Unit No.: Emergency Generators General Reference: 40 CFR 60 Subpart IIII

 $Registration \ \#'s: \ 9-0918, \ 9-0967, \ 9-1035, \ \overline{9-1055}, \ 9-1090, \ 9-1091, \ 9-1092, \ 9-1116, \ 9-1117, \ 9-1136, \ \overline{9-1137}, \ 9-1146, \ 9-1155, \ 9-1156, \ 9-1243, \ 9-1244, \ 9-1146, \ 9-1156$ 

	standard/Limit or Operational Limitation: nes certified to the emission standards of 40 CFR 60.4205(b)
	nd maximum engine horsepower.
Permit Shield Request: Yes	
Compliance Demonstration:	
Check appropriate reports re	equired to be submitted:
Quarterly Monitoring	Report:
X Annual Compliance C	Certification:
X Semi-Annual Monito	ring Report:
Methods used to demonstrate comp	pliance:
Monitoring: Reference	Describe:
Testing: Reference	Describe:
Record Keeping: Reference 40CFR60	Subpart IIII Describe: Maintain on site for the life of the source
	acture date of the diesel engine, the manufacturer model year
	allation date of the diesel engine and the certifications of
compliance or manufacturer engi	ine test date required by 40CFR 60.4211 and 60.4214(b).
Reporting: Reference	Describe:

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 <u>26</u> of <u>52</u>

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

Emissions Unit No.: Emergency Generators General Reference: 40 CFR 60 Subpart IIII

Registration #'s: 9-0918, 9-0967, 9-1035, 9-1055, 9-1090, 9-1091, 9-1092, 9-1116, 9-1117, 9-1136, 9-1137, 9-1146, 9-1155, 9-1156, 9-1243, 9-1244

manufacturer's written instructions or according to procedures developed by the owner or	
operator that are approved by the manufacturer. Change only those settings that are permitted by the manufacturer and meet the requirements of 40CFR89, 94 and/or 1068 as they apply.  Permit Shield Request: Yes  Compliance Demonstration:  Check appropriate reports required to be submitted:     Quarterly Monitoring Report:     X Annual Compliance Certification:     X Semi-Annual Monitoring Report:  Methods used to demonstrate compliance:  Monitoring: Reference  Describe:  Testing: Reference  Describe:  Record Keeping: Reference 40CFR60.4211  Describe: Maintain a copy of the manufacturer's written instructions and approved changes developed by the owner or operator.	Briefly describe the Emission Standard/Limit or Operational Limitation:  Operate and maintain an NSPS emergency diesel generator and control devices according to the
Permit Shield Request: Yes  Compliance Demonstration:  Check appropriate reports required to be submitted: Quarterly Monitoring Report: X Annual Compliance Certification: X Semi-Annual Monitoring Report:  Methods used to demonstrate compliance:  Monitoring: Reference  Describe:  Testing: Reference  Describe:  Record Keeping: Reference 40CFR60.4211  Describe: Maintain a copy of the manufacturer's written instructions and approved changes developed by the owner or operator.	manufacturer's written instructions or according to procedures developed by the owner or
Compliance Demonstration:  Check appropriate reports required to be submitted: Quarterly Monitoring Report: X Annual Compliance Certification: X Semi-Annual Monitoring Report:  Methods used to demonstrate compliance:  Monitoring: Reference  Describe:  Testing: Reference  Describe:  Record Keeping: Reference 40CFR60.4211 Describe: Maintain a copy of the manufacturer's written instructions and approved changes developed by the owner or operator.	operator that are approved by the manufacturer. Change only those settings that are permitted
Check appropriate reports required to be submitted:  Quarterly Monitoring Report:  X Annual Compliance Certification:  X Semi-Annual Monitoring Report:  Methods used to demonstrate compliance:  Monitoring: Reference  Describe:  Testing: Reference  Describe:  Record Keeping: Reference 40CFR60.4211  Describe: Maintain a copy of the manufacturer's written instructions and approved changes developed by the owner or operator.	by the manufacturer and meet the requirements of 40CFR89, 94 and/or 1068 as they apply.
Check appropriate reports required to be submitted: Quarterly Monitoring Report: X Annual Compliance Certification: X Semi-Annual Monitoring Report:  Methods used to demonstrate compliance:  Monitoring: Reference  Describe:  Testing: Reference  Describe:  Record Keeping: Reference 40CFR60.4211  Describe: Maintain a copy of the manufacturer's written instructions and approved changes developed by the owner or operator.	Permit Shield Request: Yes
Quarterly Monitoring Report:  X Annual Compliance Certification: X Semi-Annual Monitoring Report:  Methods used to demonstrate compliance:  Monitoring: Reference  Describe:  Testing: Reference  Describe:  Record Keeping: Reference 40CFR60.4211  Written instructions and approved changes developed by the owner or operator.	Compliance Demonstration:
Monitoring: Reference Describe:  Testing: Reference Describe:  Record Keeping: Reference 40CFR60.4211 Describe: Maintain a copy of the manufacturer's written instructions and approved changes developed by the owner or operator.	Quarterly Monitoring Report:  X Annual Compliance Certification:
Testing: Reference Describe:  Record Keeping: Reference 40CFR60.4211 Describe: Maintain a copy of the manufacturer's written instructions and approved changes developed by the owner or operator.	Methods used to demonstrate compliance:
Record Keeping: Reference 40CFR60.4211 Describe: Maintain a copy of the manufacturer's written instructions and approved changes developed by the owner or operator.	Monitoring: Reference Describe:
Record Keeping: Reference 40CFR60.4211 Describe: Maintain a copy of the manufacturer's written instructions and approved changes developed by the owner or operator.	
Record Keeping: Reference 40CFR60.4211 Describe: Maintain a copy of the manufacturer's written instructions and approved changes developed by the owner or operator.	
Record Keeping: Reference 40CFR60.4211 Describe: Maintain a copy of the manufacturer's written instructions and approved changes developed by the owner or operator.	Testing: Reference Describe:
written instructions and approved changes developed by the owner or operator.	
written instructions and approved changes developed by the owner or operator.	
Reporting: Reference Describe:	written instructions and approved changes developed by the owner or operator.
Reporting: Reference Describe:	
	Reporting: Reference Describe:

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 27 of 52

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

Emissions Unit No.: Emergency Generators General Reference: 40 CFR 60 Subpart IIII
Registration #'s: 9-0918, 9-0967, 9-1035, 9-1055, 9-1090, 9-1091, 9-1092, 9-1116, 9-1117, 9-1136, 9-1137, 9-1146, 9-1155, 9-1156, 9-1243, 9-1244

uion # 8: 9-0918, 9-0967, 9-1033, 9-1033	, 9-1090, 9-1091, 9-1092, 9-1116, 9-1117, 9-1136, 9-1137, 9-1146, 9-1135, 9-1136, 9-1243,
	Standard/Limit or Operational Limitation: in an NSPS emergency diesel generator that meets the
requirements of 40CFR80.5	510(b) (sulfur content: 15ppm maximum, cetane index of 40
	ntent of 35 volume percent minimum), unless a waiver is
obtained from the Departm	ment and/or the EPA Administrator.
Permit Shield Request: Yes	
Compliance Demonstration:	
Charle appropriate reports	required to be submitted.
Check appropriate reports r	1
Quarterly Monitoring	
	Certification:
A Semi-Annual Monito	oring Report:
Methods used to demonstrate com	npliance:
M	D
Monitoring: Reference	Describe:
Testing: Reference	Describe:
	R60.4207 Describe: For each fuel delivery, obtain from the
	certification consisting of the name of the fuel supplier, the
- · · · · · · · · · · · · · · · · · · ·	of fuel delivered, and a statement from the fuel supplier that
the diesel fuel complies with	the specifications of 40CFR80.510. Maintain for at least 5 years.
Reporting: Reference	Describe:

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 <u>28</u> of <u>52</u>

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

Emissions Unit No.: Emergency Generators General Reference: 40 CFR 60 Subpart IIII
Registration #s: 9-0918, 9-0967, 9-1035, 9-1055, 9-1090, 9-1091, 9-1092, 9-1116, 9-1117, 9-1136, 9-1137, 9-1146, 9-1155, 9-1156, 9-1243, 9-1244

Non-emergency use of each NSPS emergency diesel generator for the purpose of

Briefly describe the Emission Standard/Limit or Operational Limitation:

maintenance checks and readiness testing is limited to 100 hours per year or less
unless prior approval is received from the Department.
Permit Shield Request: Yes
Compliance Demons tration:
Check appropriate reports required to be submitted:
Quarterly Monitoring Report:
X Annual Compliance Certification:
X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference Describe:
Testing: Reference Describe:
D 11 D 26 11 02 06C D 1 Maintain a log for the emergency
Record Keeping: Reference 26.11.03.06C Describe: Maintain a log for the emergency generator indicating the amounts of fuel combusted, the hours of operation, amount of
urea used and reason for generator operation (i.e., maintenance or operational testing,
power outage, etc.)
Reporting: Reference 26.11.03.06C Describe: Report the amounts of fuel combusted, the hours of operation, and reason for generator operation (i.e., maintenance or
operational testing, power outage, etc.) to the Department in the annual emission
certification report due on April 1 of each year.

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 <sup>29</sup> of <u>52</u>

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

Emissions Unit No.: Emergency Generators General Reference: 40 CFR 63 Part ZZZZ Registration #'s: 9-0918, 9-0967, 9-1035, 9-1055, 9-1090, 9-1091, 9-1092, 9-1116, 9-1117, 9-1136, 9-1137, 9-1146, 9-1155, 9-1156, 9-1243, 9-1244

Briefly describe the Emission Standard/Limit or Operational Limitation:

To comply, a new stati	onary emergency generator located at an area source for
Hazardous Air Pollutan	ts must meet the requirements of 40 CFR 60 Subpart IIII.
Permit Shield Request: Yes	
Compliance Demons tration	:
Check appropriate report	s required to be submitted:
Quarterly Monitor	ing Report:
	ce Certification:
X Semi-Annual Mor	nitoring Report:
Methods used to demonstrate co	ompliance:
Monitoring: Reference	Describe:
Testing: Reference	Describe:
D 114 ' D C 40C'	EDC2 (E00/a) (1) D
<del></del>	FR63.6590(c)(1) Describe: Maintain on site for the life of the source sufacture date of the diesel engine, the manufacturer model year
	estallation date of the diesel engine and the certifications of
	engine test date required by 40CFR 60.4211 and 60.4214(b).
Reporting: Reference	Describe:

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16 Revision Date 4/29/03

TTY Users 1-800-735-2258

<sup>30</sup> of <u>52</u>

## **SECTION 4. CONTROL EQUIPMENT**

1. <u>Associated Emissions Units No</u> . : 9-1035, 9-1 9-1091, 9-1 9-1136, 9-1	1116,	2. Emissions Point No.: SCEUP-1 to SCEUP-18, NCEUP-1 to NCEUP-24, ECEUP-1 to ECEUP-28
3. Type and Description of Control Equipment:		
Selective Catalytic Reduc	ction (	SCR) unit on each generator.
4. Pollutants Controlled:	Cont	rol Efficiency:
NOx		90%

Form Number: MDE/ARMA/PER.020 Page 10 of 16 Revision Date 4/29/03

TTY Users 1-800-735-2258

31 <sup>of</sup> 52 Recycled Paper

## SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 9-0449 &	9-0450	2. MDE Registration No.:(if applicable)
1a. Date of installation (month/year):	March/1978	9-0449 & 9-0450
<u> </u>	isting of an aut	as 9814A-2 and 9814A-3,
4. Federally Enforceable Limit on the	Operating Schedule for	r this Emissions Unit
General Reference:	Operating Senedule 101	tills Elmosions Omt.
Continuous Processes:	hours/day	days/year
Batch Processes:	hours/batch	batches/day
	days/year	
5. Fuel Consumption: Type(s) of Fuel  1. 2.	% Sulfur	Annual Usage (specify units)
3		
6. Emissions in Tons:		
		VOC 0 PM10 0 HAPs 0

Form Number: MDE/ARMA/PER.020 Page 5 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 <u>32</u> of <u>52</u>

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

**Emissions Unit No.:** 9-0449 & 9-0450 **General Reference:** COMAR 26.11.06.02C(2)

Briefly describe the Emission Standard/Limit or Operational Limitation:  No discharge of emissions, other than water in an uncombined form,
which is visible to human observers, unless during start-up, process
modifications or occasional cleaning of control equipment if not
greater than 40% opacity and do not occur for more than 6 minutes.
Permit Shield Request: Yes

## **Compliance Demons tration:**

Check appropriate reports required to be submitted:

Quarterly Monitoring Report:

X Annual Compliance Certification:

X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference 26.11.03.06C Describe: Conduct visual observations of the baghouse exhaust quarterly.
Testing: Reference Describe:
Record Keeping: Reference 26.11.03.06C Describe: Maintain a log of the dates and times of visible emissions observations for a period of at least 5 years.
Reporting: Reference Describe: Report incidents of visible emissions to the Department through establish procedures.

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16 Revision Date 4/29/03

TTY Users 1-800-735-2258

<u>33</u> of <u>52</u>

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

Emissions Unit No.: 9-0449 & 9-0450 General Reference: COMAR 26.11.06.03B(2) (a)

Briefly describe the Emission Standard/Limit or Operational Limitation:  No discharge into the outdoor atmosphere particulate matter in excess		
of 0.03 grains per standard cubic feet dry.		
P. 's Cl.' 11 P. st. Vog		
Permit Shield Request: Yes		
Compliance Demonstration:		
Check appropriate reports required to be submitted:		
Quarterly Monitoring Report:		
X Annual Compliance Certification: X Semi-Annual Monitoring Report:		
<u> </u>		
Methods used to demonstrate compliance:		
Monitoring: Reference 26.11.03.06C Describe: Develop and maintain a preventive		
maintenance plan for the baghouse that describes the maintenance activity and time schedule for completing each activity.		
Testing: Reference Describe:		
Record Keeping: Reference 26.11.03.06C Describe: Maintain a copy of the preventive		
maintenance plan and a record of the dates and description of activity		
performed. Maintain records of baghouse malfunctions and corrective		
actions. All records to be maintained for at least 5 years.		
Reporting: Reference 26.11.03.06C Describe: Submit the maintenance plan		
and records of maintenance activities to the Department upon request.		
Frequency of submittal of the compliance demonstration:As required		

Form Number: MDE/ARMA/PER.020 Page 6 of 16

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

Emissions Unit No.: 9-0449 & 9-0450 General Reference: MDE PTC Condition 5

Briefly describe the Emission Standard/Limit or Operational Limitation:  Record the annual quantity of material processed by the automatic
material collection system and separate continuous operating system.
Permit Shield Request: Yes
Compliance Demonstration:
Check appropriate reports required to be submitted:  Quarterly Monitoring Report:  X Annual Compliance Certification:  X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference Describe:
Testing: Reference Describe:
Record Keeping: Reference 26.11.03.06C Describe: Maintain the material throughput records for at least 5 years.
MDE PTC  Reporting: Reference Condition 6 Describe: Make records available to the Department upon request.

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 35 of <u>52</u>

## SECTION 4. CONTROL EQUIPMENT

1. <u>Associated Emissions Units No.</u> : 9-0449 an 9-0450	d	2. Emissions Point No.: 9814A-2 and 9814A-3
3. Type and Description of Control Equipment:		
E	3agh	ouse
4. Pollutants Controlled:	Con	trol Efficiency:
PM (9-0449)		99.3%
PM (9-0450)		99.1%
5. Capture Efficiency: 100%		

Form Number: MDE/ARMA/PER.020 Page 10 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 36 of 52

## SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 6-0375	2. MDE Registration No.:(if applicable)	
1a. Date of installation (month/year): June/1992	6-0375	
3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s): Plating Operation consisting of surface coating of steel or aluminum parts to add durability and extend service life, controlled by a packed bed scrubber emission control system. The exhaust point is identified as 9706-1.		
4. Federally Enforceable Limit on the Operating Schedule for General Reference:	r this Emissions Unit:	
Continuous Processes: hours/day	days/year	
Batch Processes: hours/batch	batches/day	
days/year		
5. Fuel Consumption: Type(s) of Fuel  1.  2.	Annual Usage (specify units)	
3		
6. Emissions in Tons:		
A. Actual Major: Potential Major:_	(note: before control device)	
B. Actual Emissions: NOx_0_ SOx_0	VOC_0PM100 HAPs0	

Form Number: MDE/ARMA/PER.020 Page 5 of 16

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

Emissions Unit No.: 6-0375 General Reference: COMAR 26.11.06.02C(2)

Briefly describe the Emission Standard/Limit or Operational Limitation: No discharge of emissions, other than water in an uncombined form,
which is visible to human observers, unless during start-up, process
modifications or occasional cleaning of control equipment if not
greater than 40% opacity and do not occur for more than 6 minutes.
Permit Shield Request: Yes
Compliance Demons tration:
Check appropriate reports required to be submitted:  Quarterly Monitoring Report:  X Annual Compliance Certification:  X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference <sup>26.11.03.06C</sup> Describe:  Perform preventative maintenance once per month or as recommended by the equipment manufacturer on scrubbers that control emission units.
<u>Sesting: Reference</u> Describe:

Frequency of submittal of the compliance demonstration:	As required
---	-------------

Maintain a log of the maintenance performed on the scrubbers. The log shall be kept on site for at least 5 years and make available to the Department

Reporting: Reference Describe:

Form Number: MDE/ARMA/PER.020 Page 6 of 16 Revision Date 4/29/03

Record Keeping: Reference 26.11.03.06C Describe:

TTY Users 1-800-735-2258

upon request.

38 of <u>52</u>

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

Emissions Unit No.: 6-03/5 General Reference: COMAR 26.11.06.03B(2) (a)
Briefly describe the Emission Standard/Limit or Operational Limitation:  No discharge into the outdoor atmosphere particulate matter in excess of 0.03 grains per standard cubic feet dry.
Permit Shield Request: Yes
Compliance Demons tration:
Check appropriate reports required to be submitted:  Quarterly Monitoring Report:  X Annual Compliance Certification:  X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference 26.11.03.06C Describe: Perform preventive maintenance once per month or as recommended by the equipment manufacturer on scrubbers that control emissions units.
Testing: Reference Describe:
Record Keeping: Reference 26.11.03.06C Describe: Maintain a log of maintenance performed on the scrubbers. The log shall be kept on site for at least 5 years and make available to the Department upon request.
Reporting: Reference Describe:

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 <u>39</u> of <u>52</u>

## SECTION 4. CONTROL EQUIPMENT

1. <u>Associated Emissions Units No</u> .: 6-0375	2. Emissions Point No.: 9706-1	
3. Type and Description of Control Equipment:		
Four packed bed scrubbers contro	lling individual and separate	
plating lines		
4. Pollutants Controlled:	Control Efficiency:	
Sulfuric Acid	99%	
Nitric Acid	33%	
Hydrofluoric Acid	88.2%	
Chromic Acid (mist)	99.3%	
5. Capture Efficiency: 100%, as air flow creates negative pressure for room.		

Form Number: MDE/ARMA/PER.020 Page 10 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 <u>40</u> of <u>52</u>

#### SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 6-1114	2. MDE Registration No.:(if applicable)	
1a. Date of installation (month/year): January/2002	6-1114	
3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s):  One (1) Future Cure Model 1000 paint spray booth for miscellaneous  metal coating. The exhaust point is identified as 9706-2.		
4. Federally Enforceable Limit on the Operating Schedule for	r this Emissions Unit:	
General Reference:		
Continuous Processes: hours/day	days/year	
Batch Processes: hours/batch	batches/day	
days/year		
5. Fuel Consumption: Type(s) of Fuel % Sulfur 1 2		
3		
6. Emissions in Tons:		
A. Actual Major: Potential Major: B. Actual Emissions: NOx 0 SOx 0		

Form Number: MDE/ARMA/PER.020 Page 5 of 16

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

Emissions Unit No	General Reference: COMAR 26.11.19.021	
	e Emission Standard/Limit or Operational Limitation: od operating practices to minimize VOC emissions into	
Permit Shield Requ	lest: Yes	
Check appropriate reports required to be submitted:  Quarterly Monitoring Report:  X Annual Compliance Certification:  X Semi-Annual Monitoring Report:		
Methods used to demo	onstrate compliance:	
in writing. Dis	e 26.11.19.02I Describe: Establish good operating practices splay the good operating practices so that they are to the operator or include them in operator training.	
Testing: Reference	Describe:	
MDE PTC  Record Keeping: Reference Condition Da Describe: Maintain records of monthly material usage and hours of operation for at least 5 years.		
Reporting: Reference 26.11.19.02I Describe: Make written operating practices available to the Department upon request.		

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 <u>42</u> of <u>52</u>

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

Emissions Unit No.: 6-1114 General Reference: COMAR 26.11.19.021
Briefly describe the Emission Standard/Limit or Operational Limitation:  Take all reasonable precautions to prevent or minimize the discharge
of VOC into the atmosphere when cleaning process and coating
application equipment, including containers, vessels, tanks, lines
and pumps.
Permit Shield Request: Yes
Compliance Demonstration:
Check appropriate reports required to be submitted:
Quarterly Monitoring Report:  X Annual Compliance Certification:
X Semi-Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference Describe:
Tolltoring, Reference Describe
Cesting: Reference Describe:
CString. Reference Describe.
Record Keeping: Reference 26.11.19.02   Describe: Maintain written standard
perating procedures for frequently cleaned equipment.
Describer
Reporting: Reference Describe:

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

#### SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 6-1095	2. MDE Registration No.:(if applicable)
1a. Date of installation (month/year):August/2006	6-1095
3. Detailed description of the emissions unit, including all Vehicle Refinishing Equipment. The exha	
3900-2.	
4. Federally Enforceable Limit on the Operating Schedule General Reference:	for this Emissions Unit:
	days/year
Batch Processes: hours/batc	h batches/day
days/year	
5. Fuel Consumption: Type(s) of Fuel % Sulfur 1	Annual Usage (specify units)
2	
6. Emissions in Tons:  A. Actual Major: Potential Major	r: (note: before control device)
B. Actual Emissions: NOx_0 SOx0_	

Form Number: MDE/ARMA/PER.020 Page 5 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 <u>44</u> of <u>52</u>

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

Emissions Unit No.:	General Reference: General PTC
Exclusively perf	dission Standard/Limit or Operational Limitation: Form vehicle refinishing and use less than 400 gallons The provided Highlight
Permit Shield Request:	Yes
Quarterly Mo X Annual Com	reports required to be submitted:  onitoring Report:  pliance Certification:  Monitoring Report:
Methods used to demonstr	ate compliance:
	Describe:
Sesting: Reference	Describe:
Record Keeping: Reference naterial usage.	<u>e</u> Describe: Maintain monthly records of
Reporting: Reference	Describe:
Frequency of su	ıbmittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 45 of 52

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

Emissions Unit No.: _	6-1095	General Reference:	General PTC	
		or Operational Limitati VOC content for	ion: Vehicle Refinishing	
Permit Shield Request:	Yes			
Quarterly Mo X Annual Com	reports required to be			
lethods used to demonst	rate compliance:			
esting: Reference	Des	cribe:		
ecord Keeping: Referend aterial usage.	<del></del>		onthly records of	
eporting: Reference	D	escribe:		

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

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

Emissions Unit No.: _	6-1095	General Reference:	General PTC	
11	mission Standard/Limit be applied by H	*		
Permit Shield Request	: Yes			
Quarterly M X Annual Cor	reports required to be s			
Methods used to demons	trate compliance:			]
		ibe:		
Testing: Reference	Desc	cribe:		
Record Keeping: Referer	ice D	escribe:		
Reporting: Reference	De	escribe:		
Frequency of	submittal of the compli	iance demonstration:	As required	<u>1</u>

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 47 of 52

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

Emissions Unit No.: 6-109	General Reference: General PTC	
	tandard/Limit or Operational Limitation: all be conducted in a spray booth, and the	
spray booth shall be	equipped with an exhaust filter during all	
times of use.		
Permit Shield Request: Yes		
Compliance Demonstration:		
Check appropriate reports r		
Quarterly Monitoring	Report:	
	Certification: ring Report:	
Methods used to demonstrate com-	pliance:	
Monitoring: Reference	Describe:	-
		-
		-
Testing: Reference	Describe:	_
		-
		-
Record Keeping: Reference	Describe:	_
		-
		-
Reporting: Reference	Describe:	-
		-
		-
Frequency of submitta	of the compliance demonstration: As required	
	<b>/</b>	_

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 48 of 52

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

Emissions Unit No.: 6-10	General Reference: General PTC
	tandard/Limit or Operational Limitation: ings may not exceed five percent of volume of
all coatings on a mon	thly basis.
Permit Shield Request: Yes	
Compliance Demonstration:	
Check appropriate reports re Quarterly Monitoring X Annual Compliance O X Semi-Annual Monitor	Report: Certification:
Methods used to demonstrate comp	pliance:
Monitoring: Reference	Describe:
	Describe:
Record Keeping: Reference material usage.	Describe: Maintain monthly records of
Reporting: Reference	Describe:
Frequency of submitted	of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 49 of 52

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

General Reference: General Fic
Briefly describe the Emission Standard/Limit or Operational Limitation:  Perform good operating practices and equipment cleanup procedures
to reduce VOC emissions.
Permit Shield Request: Yes
Compliance Demonstration:
Check appropriate reports required to be submitted:  Quarterly Monitoring Report:  Annual Compliance Certification:  Semi- Annual Monitoring Report:
Methods used to demonstrate compliance:
Monitoring: Reference Describe:
Testing: Reference Describe:
Record Keeping: Reference General PTC Describe: Maintain written good operating practices.
Reporting: Reference Describe:

Frequency of submittal of the compliance demonstration: As required

Form Number: MDE/ARMA/PER.020 Page 6 of 16

Revision Date 4/29/03 TTY Users 1-800-735-2258 50 of 52

## STATE-ONLY ENFORCEABLE REQUIREMENTS

## **Facility Information:**

Name of Facility:	County
National Security Agency	Anne Arundel
Premises Number:	
003-00317	
Street Address:	
9800 Savage Road, Suite 6218 Fort Mead	e, MD 20755-6218
24-hour Emergency Telephone Number for Air Pollution M	latters:
Type of Equipment (List Significant Units):	
Four (4) Garland natural gas-fired cha	rbroilers, Model Radiant.
One (1) Jade Supreme natural gas-fired	charbroiler, Model JB-48-F.

Form Number: MDE/ARMA/PER.020 Page 15 of 16 Revision Date 4/29/03

TTY Users 1-800-735-2258

## CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY ENFORCEABLE REQUIREMENTS

<b>Registration No.:</b> 8-0363, 8-0340
Emissions Unit No.: 8-0363, 8-0340 General Reference: 26.11.18.06B
Briefly describe the requirement and the emissions limit (if applicable):
Discharge of visible emissions shall be less than or equal to
30 percent opacity.
Methods used to demonstrate compliance: Charbroiler is operated per the manufacturer's instructions.

Form Number: MDE/ARMA/PER.020 Page 16 of 16 Revision Date 4/29/03

TTY Users 1-800-735-2258

# 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. 20 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. <u>17</u> 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. 2 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;
- (7) X 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) X Confection cookers where the products are edible and intended for human consumption;
- (10) X Die casting machines;
- (11) Photographic process equipment used to reproduce an image upon sensitized material through the use of radiant energy;
- (12) X Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;

- (13) X 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) X 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; (d) No. <sup>77</sup> Storage of lubricating oils: (e) No. \_\_\_\_ Unheated storage of VOC with an initial boiling point of 300 °F ( (f) No. 125 Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel, (g) No. \_\_\_ Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less; (h) No. <sup>100</sup> 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,

_		
(6	a)	Aluminum or any alloy containing over 50 percent aluminum, if no gaseous chloride compounds, chlorine, aluminum chloride, or aluminum fluoride is used;
(I	o)	Magnesium or any alloy containing over 50 percent magnesium;
(0	c)	Lead or any alloy containing over 50 percent lead;
(0	d)	Tin or any alloy containing over 50 percent tin;
(6	e)	Zinc or any alloy containing over 50 percent zinc;
(1	f)	Copper;
(9	g)	Precious metals;
(19) <u>X</u>	_	roilers and pit barbecues as defined in COMAR 26.11.18.01 with a poking area of 5 square feet (0.46 square meter) or less;
(20) <u>X</u>	related	id and emergency medical care provided at the facility, including activities such as sterilization and medicine preparation used in t of a manufacturing or production process;
(21) <u>X</u>		n recreational equipment and activities, such as fireplaces, barbecue d cookers, fireworks displays, and kerosene fuel use;
(22) <u>X</u>	_ Potable	e water treatment equipment, not including air stripping equipment;
(23) <u>X</u>	Firing	and testing of military weapons and explosives;
(24)	Emissi operati explos	ions resulting from the use of explosives for blasting at quarrying ions and from the required disposal of boxes used to ship the ive;
(25) <u>X</u>	_ Comfo Air Ac	rt air conditioning subject to requirements of Title VI of the Clean et;
(26)	_ Grain,	metal, or mineral extrusion presses;
(27)	_ Brewei	ries with an annual beer production less than 60,000 barrels;

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:

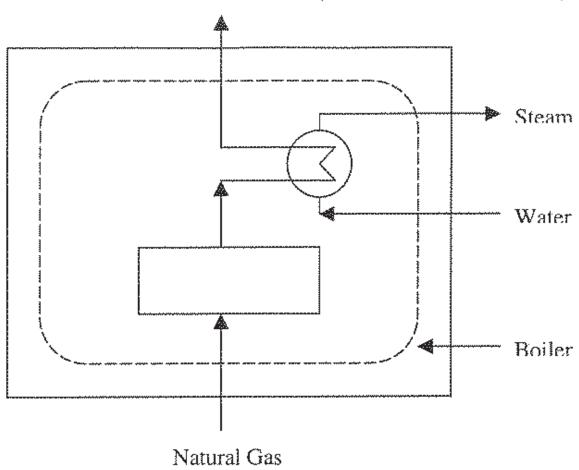
(28) Natural draft hoods or natural draft ventilators that exhaust air pollutants into the ambient air from manufacturing/industrial or commercial processes;
(29) X Laboratory fume hoods and vents;
(30)No. 1 Sheet-fed letter or lithographic printing press(es) with a cylinder width of less than 18 inches;
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
(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.

# Appendix A

Flow Diagrams

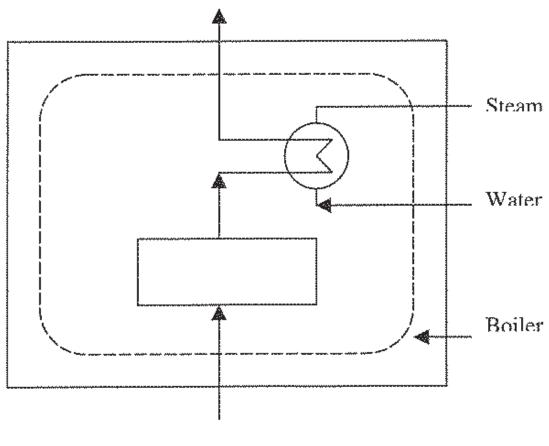
## BOILER PROCESS FLOW DIAGRAM #1: NATURAL GAS-FIRED BOILER

Emission Point (Gas Combustion Products)



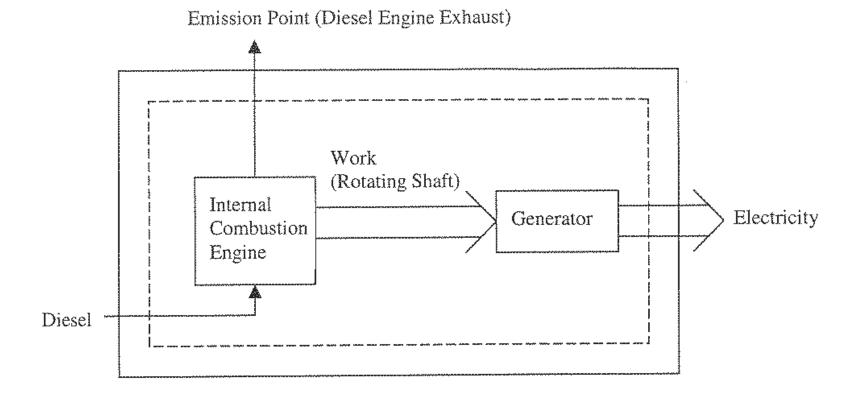
# BOILER PROCESS FLOW DIAGRAM #2: NO. 2 FUEL OIL-FIRED BOILER

Emission Point (Fuel Oil Combustion Products)

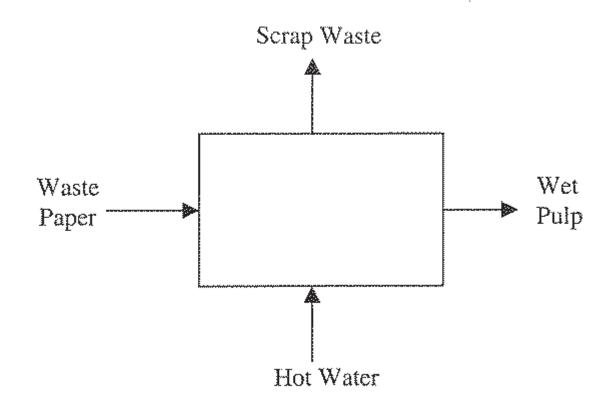


No. 2 Fuel Oil

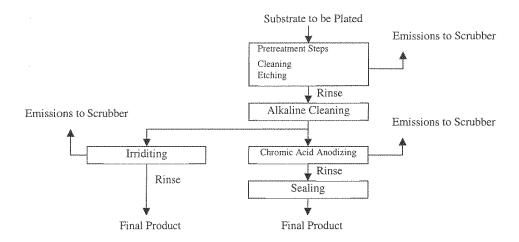
## DIESEL GENERATOR PROCESS FLOW DIAGRAM



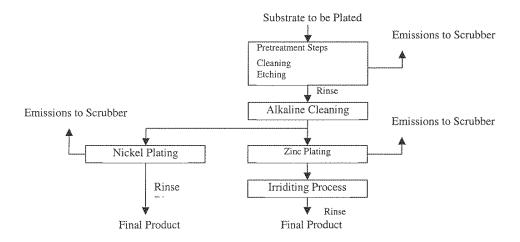
# PAPER PULP OPERATION PROCESS FLOW DIAGRAM



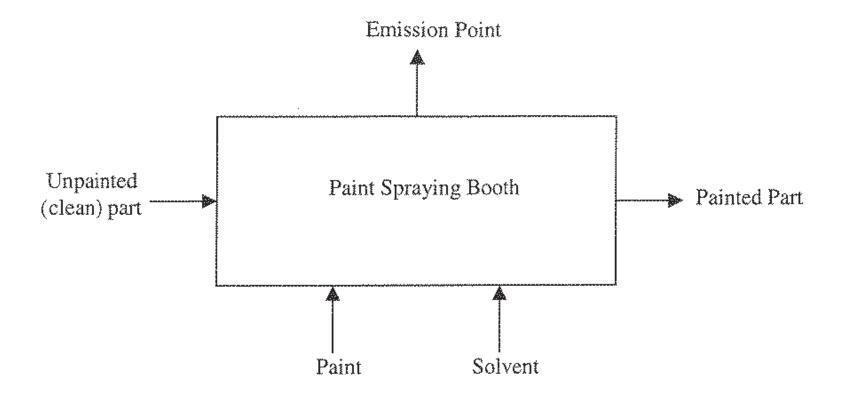
#### SPC ALUMINUM PLATING OPERATION PROCESS FLOW DIAGRAM



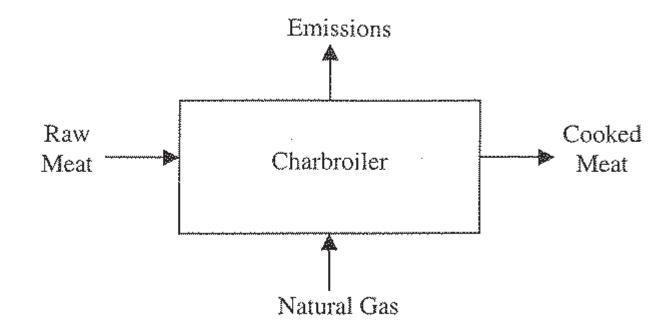
#### SPC STEEL PLATING OPERATION PROCESS FLOW DIAGRAM



## PAINT BOOTH OPERATIONS PROCESS FLOW DIAGRAM



# CHARBROILER PROCESS FLOW DIAGRAM



# Appendix B

**Emissions Certification Report** 

#### MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard, Suite 715 ● Baltimore, Maryland 21230-1720 410-537-3000 ● 1-800-633-6101 ● <a href="http://www.mde.state.md.us">http://www.mde.state.md.us</a>
Air and Radiation Management Administration
Air Quality Compliance Program
410-537-3220

FORM 1:

# GENERAL FACILITY INFORMATION EMISSIONS CERTIFICATION REPORT

		Calendar Year: 2022
		Do Not Write in This Space
A. FACILITY IDENTIFICATION		Date Received Regional
Facility Name National Security Agency		
Address 9800 Savage Road, Attention: ME6,		Date Received State
City Fort Meade County Anne Aru	<b>ndel</b> Zip Code <b>20755-6218</b>	AIRS Code
B. Briefly Describe the Major Function of the Facility		FINDS Code
Steam generation, emergency electric power	generation and	SIC Code
declassification operations.		Facility Number:
·		
		TEMPO ID:
C. SEASONAL PRODUCTION (%, if applicable) No	t Applicable	Reviewed by:
	r (Jun-Aug)   Fall (Sept-Nov)	Treviewed by:
		Name Date
D. Explain any increases or decrease in emissions fro	om the previous calendar year for each r	egistration at this faciltiy.
Most changes are the result of new permitted	sources and/or closed sources.	
E. CONTROL DEVICE INFORMATION (for NOx an	nd VOC sources only)	
Control Device	Capture Efficiency	Removal Efficiency
Selective Catalytic Reduction units	100%	90% - 95%
Plating shop fume scrubbers	100%	95%
Triating one prame corabboro	100%	3070
		-
		1
I am familiar with the facility and the installations and s	sources for which this report is submitted	I have personally examined the
information in this report, which consists of $\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ $	es (including attachments), and certify the	at the information is correct to the
best of my knowledge.		
	nstallations & Logistics	
Name (Print/Type)	Title	Date
		(301)-688-2970
Signature		Telephone

1/9/08

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Oxides of Nitrogen (NOX)

Equipment Description/	SCC			Actual E	missions		Opera	ating Sche	edule (Act	tual)		TOSD	Opei	rating Sche	edule	Emissions
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9900 Boiler #1	1-03-006-03	Natural	S	0.03	1.17		variable	variable				1.06		variable	variable	C3
5-0644		Gas	F			24.0			7	52	365		24.0			
9900 Boiler #2	1-03-006-03	Natural	S	0.00	23.22		variable	variable				21.88		variable	variable	C3
5-0645		Gas	F			24.0			7	52	365		24.0			
9807 Boiler #1	1-03-006-02	Natural	S	1.88	20.51		variable	variable				30.21		variable	variable	C1
5-0502		Gas	F			24.0			7	26	183		24.0			
9807 Boiler #1	1-03-005-02	No. 2	S	0.02	15.79		variable	variable				0.00		variable	variable	C1
5-0502		Fuel Oil	F			24.0			7	0	2		0.0			
9807 Boiler #2	1-03-006-02	Natural	S	0.46	10.48		variable	variable				6.21		variable	variable	C1
5-0503		Gas	F			24.0			7	13	88		24.0			
9807 Boiler #2	1-03-005-02	No. 2	S	0.02	16.44		variable	variable				0.00		variable	variable	C1
5-0503		Fuel Oil	F			24.0			7	0	2		0.0			
9807 Boiler #3	1-03-006-02	Natural	S	3.43	49.70		variable	variable				44.12		variable	variable	C1
5-0504		Gas	F			24.0			7	20	138		24.0			
9807 Boiler #3	1-03-005-02	No. 2	S	0.02	19.79		variable	variable				0.00		variable	variable	C1
5-0504		Fuel Oil	F			24.0			7	0	2		0.0			
9807 Boiler #4	1-03-006-02	Natural	S	5.97	58.44		variable	variable				133.18		variable	variable	C1
5-0505		Gas	F			24.0			7	29	204		24.0			
9807 Boiler #4	1-03-005-02	No. 2	S	0.00	4.15		variable	variable				7.70		variable	variable	C1
5-0505		Fuel Oil	F			24.0			7	0	2		24.0			
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Oxides of Nitrogen (NOX)

Equipment Description/	SCC			Actual E	missions		Oper	ating Sche	edule (Act	tual)		TOSD	Ope	rating Sche	edule	Emissions
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9960 Boiler #1	1-03-006-03	Natural	S	0.04	0.55		variable	variable				0.01		variable	variable	C3
5-0891		Gas	F			24.0			7	23	160		24.0			
9960 Boiler #2	1-03-006-03	Natural	S	0.04	0.51		variable	variable				0.01		variable	variable	C3
5-0900		Gas	F			24.0			7	23	159		24.0			
9960 Boiler #3	1-03-006-03	Natural	S	0.03	0.43		variable	variable				0.01		variable	variable	C3
5-0892		Gas	F			24.0			7	23	160		24.0			
9960 Boiler #4	1-03-006-03	Natural	S	0.05	0.57		variable	variable				0.01		variable	variable	C1
5-0900		Gas	F			24.0			7	23	160		24.0			
9817 Boiler	1-03-006-02	Natural	S	0.00	0.01		variable	variable				0.01		variable	variable	C3
5-0674		Gas	F			21.3			7	7	50		20.5			
9816 South Gen Plant	2-01-001-02	Diesel	S	0.67	405.60		variable	variable				387.60		variable	variable	C1
9-1035			F			36.0			1	3	3		36.0			
9950 North Gen Plant	2-01-001-02	Diesel	S	0.65	338.61		variable	variable				284.40		variable	variable	C1
9-1055			F			39.6			1	4	4		54.0			
9816B Engine #1	2-01-001-02	Diesel	S	0.08	80.72		variable	variable				82.69		variable	variable	C1
9-0818			F			2.0			1	2	2		2.1			
9816B Engine #2	2-01-001-02	Diesel	S	0.08	80.72		variable	variable				82.69		variable	variable	C1
9-0819			F			2.0			1	2	2		2.1			
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Oxides of Nitrogen (NOx)

Equipment Description/	SCC			Actual E	missions		Oper	ating Sche	edule (Act	ual)		TOSD	Opei	rating Sche	edule	Emissions
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9816B Engine #3	2-01-001-02	Diesel	S	0.08	80.72		variable	variable				82.69		variable	variable	C1
9-0820			F			2.0			1	2	2		2.1			
9816B Engine #4	2-01-001-02	Diesel	S	0.08	80.72		variable	variable				82.69		variable	variable	C1
9-0821			F			2.0			1	2	2		2.1			
9816B Engine #5	2-01-001-02	Diesel	S	0.10	102.37		variable	variable				126.00		variable	variable	C1
9-0822			F			2.6			1	2	2		3.2			
9816B Engine #6	2-01-001-02	Diesel	S	0.04	78.75		variable	variable				0.00		variable	variable	C1
9-0823			F			2.0			0	1	1		0.0			
VCP Engine #1	2-01-001-02	Diesel	S	0.03	5.68		variable	variable				3.84		variable	variable	C3
9-0967			F			1.6			1	9	9		1.0			
Cooper Engine	2-01-001-02	Diesel	S	0.13	25.19		variable	variable				25.25		variable	variable	C3
9-0804			F			2.4			1	10	10		2.4			
9800C Engine	2-01-001-02	Diesel	S	0.21	52.91		variable	variable				42.83		variable	variable	C3
9-1090			F			1.2			1	3	3		1.2			
9960 Engine	2-01-001-02	Diesel	S	0.06	14.64		variable	variable				6.63		variable	variable	C3
9-0806			F			1.3			1	8	8		0.6			
9703 Engine	2-01-001-02	Diesel	S	0.55	84.14		variable	variable				16.59		variable	variable	C3
9-0807			F			5.7			1	13	13		1.1			
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Oxides of Nitrogen (NOx)

Equipment Description/	SCC			Actual E	missions		Oper	ating Sche	edule (Act	ual)		TOSD	Ope	rating Sche	edule	Emissions
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9700 Engine	2-01-001-02	Diesel	S	0.27	53.31		variable	variable				38.23		variable	variable	C3
9-0442			F			3.0			1	10	10		2.2			
9840 Engine	2-01-001-02	Diesel	S	0.10	22.42		variable	variable				20.82		variable	variable	C1
9-0918			F			1.8			1	9	9		1.8			
9000 Gen Yard	2-01-001-02	Diesel	S	1.84	960.10		variable	variable				464.64		variable	variable	C1
9-1091			F			21.8			1	11	11		16.9			
9000 L/S Engine	2-01-001-02	Diesel	S	0.03	7.50		variable	variable				11.43		variable	variable	C1
9-1092			F			3.1			1	7	7		4.7			
9220-Boilers	1-03-006-03	Natural	S	0.10	0.14		variable	variable				0.09		variable	variable	C3
5-0809		Gas	F			24.0			7	209	1460		24.0			
9230-Boilers	1-03-006-03	Natural	S	0.19	0.27		variable	variable				0.20		variable	variable	C3
5-0810		Gas	F			24.0			7	209	1460		24.0			
9259-Boilers	1-03-006-03	Natural	S	0.02	0.06		variable	variable				0.02		variable	variable	C3
5-0811		Gas	F			24.0			7	104	730		24.0			
9225-Boilers	1-03-006-03	Natural	S	0.10	0.18		variable	variable				0.11		variable	variable	C3
5-0823		Gas	F			24.0			7	156	1095		24.0			
9250-Boilers	1-03-006-03	Natural	S	0.00	0.00		variable	variable						variable	variable	C3
5-0842		Gas	F			24.0			7	209	1460	0.11	24.0			
9700 Boiler	1-03-006-03	Natural	S	0.01	3.40		variable	variable						variable	variable	C3
5-0890		Gas	F			24.0			7	1	9	5.75	24.0			
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Oxides of Nitrogen (NOx)

Equipment Description/	SCC			Actual E	missions		Opera	ating Sche	edule (Act	ual)		TOSD	Opei	rating Sche	edule	Emissions
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9230 L/S Engine	2-01-001-02	Diesel	S	0.12	41.01		variable	variable						variable	variable	C1
9-1117			F			4.5			1	2	12	50.39	2.0			
9225 L/S Engine	2-01-001-02	Diesel	S	0.09	24.68		variable	variable						variable	variable	C1
9-1137			F			4.1			1	1	7	37.47	2.0			
9210 L/S Engine	2-01-001-02	Diesel	S	0.03	8.57		variable	variable						variable	variable	C1
9-1146			F			1.2			1	1	7	8.34	2.0			
9250 East Gen Plant	2-01-001-02	Diesel	S	0.52	271.61		variable	variable						variable	variable	C1
9-1155			F			13.9			1	2	2	464.64	15.2			
9250 East Gen Plant (2)	2-01-001-02	Diesel	S	1.64	852.55		variable	variable						variable	variable	C1
9-1116			F			31.5			1	1	1	464.64	8.5			
East Gen Plant (#15)	2-01-001-02	Diesel	S	0.01	7.77		variable	variable						variable	variable	C1
9-1136			F			3.2			1	0	2	14.31	2.0			
9250 L/S Engine	2-01-001-02	Diesel	S	0.01	4.19		variable	variable						variable	variable	C1
9-1156			F			1.7			1	0	3	0.00	2.0			
Total				19.82	3910.29							3049.50				
1000				10.02	0010.20							00-10.00				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify C1-User calculated based on source
test or other measurement
C2-User calculated based on material balance
using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering
judgement

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Volatile Organic Compounds (VOC)

Equipment Description/	SCC			Actual E	missions		Oper	ating Sche	edule (Act	tual)		TOSD	Oper	ating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9900 Boiler #1	1-03-006-03	Natural	S	0.00	0.06		variable	variable				0.06		variable	variable	C3
5-0644		Gas	F			24.0			7	52	365		24.0			
9900 Boiler #2	1-03-006-03	Natural	S	0.00	1.28		variable	variable				1.20		variable	variable	C3
5-0645		Gas	F			24.0			7	52	365		24.0			
9807 Boiler #1	1-03-006-02	Natural	S	0.09	1.01		variable	variable				2.70		variable	variable	C1
5-0502		Gas	F			24.0			7	26	183		24.0			
9807 Boiler #1	1-03-005-02	No. 2	S	0.00	0.22		variable	variable				0.00		variable	variable	C1
5-0502		Fuel Oil	F			24.0			7	0	2		0.0			
9807 Boiler #2	1-03-006-02	Natural	S	0.02	0.39		variable	variable				0.55		variable	variable	C1
5-0503		Gas	F			24.0			7	13	88		24.0			
9807 Boiler #2	1-03-005-02	No. 2	S	0.00	0.23		variable	variable				0.00		variable	variable	C3
5-0503		Fuel Oil	F			24.0			7	0	2		0.0			
9807 Boiler #3	1-03-006-02	Natural	S	0.19	2.72		variable	variable				3.94		variable	variable	C1
5-0504		Gas	F			24.0			7	20	138		24.0			
9807 Boiler #3	1-03-005-02	No. 2	S	0.00	0.28		variable	variable				0.00		variable	variable	C1
5-0504		Fuel Oil	F			24.0			7	0	2		0.0			
9807 Boiler #4	1-03-006-02	Natural	S	0.44	4.32		variable	variable				11.89		variable	variable	C1
5-0505		Gas	F			24.0			7	29	204		24.0			
9807 Boiler #4	1-03-005-02	No. 2	S	0.00	0.23		variable	variable				0.45		variable	variable	C1
5-0505		Fuel Oil	F			24.0			7	0	2		24.0			
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

Calendar Year: 2022

#### FORM 2:

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Volatile Organic Compounds (VOC)

Equipment Description/	SCC			Actual E	missions		Oper	ating Sche	dule (Act	tual)		TOSD	Oper	ating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9960 Boiler #1	1-03-006-03	Natural	S	0.01	0.09		variable	variable				0.00		variable	variable	C3
5-0891		Gas	F			24.0			7	23	160		24.0			
9960 Boiler #2	1-03-006-03	Natural	S	0.01	0.09		variable	variable				0.00		variable	variable	C3
5-0900		Gas	F			24.0			7	23	159		24.0			
9960 Boiler #3	1-03-006-03	Natural	S	0.01	0.07		variable	variable				0.00		variable	variable	C3
5-0892		Gas	F			24.0			7	23	160		24.0			
9960 Boiler #4	1-03-006-03	Natural	S	0.01	0.10		variable	variable				0.00		variable	variable	C3
5-0900		Gas	F			24.0			7	23	160		24.0			
9817 Boiler	1-03-006-02	Natural	S	0.00	0.00		variable	variable				0.00		variable	variable	C3
5-0674		Gas	F			21.3			7	7	50		20.5			
9816 South Gen Plant	2-01-001-02	Diesel	S	0.15	94.01		variable	variable				94.01		variable	variable	C1
9-1035			F			36.0			7	0	3		36.0			
9950 North Gen Plant	2-01-001-02	Diesel	S	0.09	44.89		variable	variable				44.89		variable	variable	C1
9-1055			F			39.6			1	4	4		54.0			
9960 Engine	2-01-001-02	Diesel	S	0.00	1.18		variable	variable				0.53		variable	variable	C3
9-0806			F			1.3			1	8	8		0.6			
9703 Engine	2-01-001-02	Diesel	S	0.02	2.37		variable	variable				0.47		variable	variable	C3
9-0807			F			5.7			1	13	13		1.1			
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Volatile Organic Compounds (VOC)

Equipment Description/	SCC			Actual E	missions		Opera	ating Sche	edule (Act	ual)		TOSD	Opei	rating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9816B Engine #1	2-01-001-02	Diesel	S	0.00	1.79		variable	variable				1.84		variable	variable	C1
9-0818			F			2.0			1	0	2		2.1			
9816B Engine #2	2-01-001-02	Diesel	S	0.00	1.79		variable	variable				1.84		variable	variable	C1
9-0819			F			2.0			1	2	2		2.1			
9816B Engine #3	2-01-001-02	Diesel	S	0.00	1.79		variable	variable				1.84		variable	variable	C1
9-0820			F			2.0			1	2	2		2.1			
9816B Engine #4	2-01-001-02	Diesel	S	0.00	1.79		variable	variable				1.84		variable	variable	C1
9-0821			F			2.0			1	2	2		2.1			
9816B Engine #5	2-01-001-02	Diesel	S	0.00	2.27		variable	variable				2.80		variable	variable	C1
9-0822			F			2.6			1	2	2		3.2			
9816B Engine #6	2-01-001-02	Diesel	S	0.00	1.75		variable	variable				0.00		variable	variable	C1
9-0823			F			2.0			0	1	1		0.0			
9800C Engine	2-01-001-02	Diesel	S	0.02	3.97		variable	variable				3.21		variable	variable	C3
9-1090			F			1.2			1	3	3		2.0			
VCP Engine #1	2-01-001-02	Diesel	S	0.00	0.00		variable	variable				0.00		variable	variable	C3
9-0967			F			1.6			1	9	9		2.0			
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Volatile Organic Compounds (VOC)

Equipment Description/	SCC			Actual E	missions		Opera	ating Sche	dule (Act	ual)		TOSD	Oper	ating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9000 Gen Yard	2-01-001-02	Diesel	S	1.02	531.89		variable	variable				182.10		variable	variable	C1
9-1091			F			21.8			1	11	11		16.9			
9000 L/S Engine	2-01-001-02	Diesel	S	0.00	7.50		variable	variable				0.85		variable	variable	C1
9-1092			F			3.1			1	7	7		2.0			
9700 Engine	2-01-001-02	Diesel	S	0.01	1.50		variable	variable				1.08		variable	variable	C3
9-0442			F			3.0			1	10	10		2.0			
9840 Engine	2-01-001-02	Diesel	S	0.01	2.35		variable	variable				2.18		variable	variable	C1
9-0918			F			1.8			1	9	9		2.0			
Cooper Engine	2-01-001-02	Diesel	S	0.00	0.71		variable	variable				0.71		variable	variable	C3
9-0804			F			2.4			1	10	10		2.0			
Cooper Spray Booth	4-02-016-99		S	0.00	0.00		variable	variable				0.00		variable	variable	C2
6-1095			F			0.0			0	0	0		0.0			
9700 Spray Booth	4-02-003-10		S	0.00	0.03		variable	variable				0.03		variable	variable	C2
6-0717			F			1.0			2	52	104		1.0			
9700 PWB Assembly	3-12-999-99		S	0.00	0.00		variable	variable				0.00		variable	variable	C2
6-0720			F	0.00	0.00	1.0			1	8	8		1.0			
9706 Paint Booth	4-02-025-01		S	0.02	0.56		variable	variable				0.56		variable	variable	C2
6-1114			F			4.0			2	40	80		4.0			
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Volatile Organic Compounds (VOC)

Equipment Description/	SCC			Actual E	missions		Opera	ating Sche	edule (Act	ual)		TOSD	Opei	rating Sch	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9220-Boiler	1-03-006-03	Natural	S	0.01	0.02		variable	variable				0.01		variable	variable	C3
5-0809		Gas	F			24.0			7	209	1460		24.0			
9230-Boiler	1-03-006-03	Natural	S	0.02	0.03		variable	variable				0.02		variable	variable	C3
5-0810		Gas	F			24.0			7	209	1460		24.0			
9259-Boiler	1-03-006-03	Natural	S	0.00	0.01		variable	variable				0.00		variable	variable	C3
5-0811		Gas	F			24.0			7	104	730		24.0			
9225-Boiler	1-03-006-03	Natural	S	0.01	0.02		variable	variable				0.01		variable	variable	C3
5-0823		Gas	F			24.0			7	156	1095		24.0			
9250-Boilers	1-03-006-03	Natural	S	0.00	0.00		variable	variable				0.01		variable	variable	C3
5-0842		Gas	F			24.0			7	209	1460		24.0			
9700 Boiler	1-03-006-03	Natural	S	0.00	0.59		variable	variable				0.99		variable	variable	C3
5-0890		Gas	F			24.0			7	1	9		24.0			
9230 L/S Engine	2-01-001-02	Diesel	S	0.00	0.09		variable	variable				0.11		variable	variable	C1
9-1117			F			4.5			1	2	12		2.0			
9225 L/S Engine	2-01-001-02	Diesel	S	0.00	0.04		variable	variable				0.06		variable	variable	C1
9-1137			F			4.1			1	1	7		2.0			
9210 L/S Engine	2-01-001-02	Diesel	S	0.00	0.26		variable	variable				0.25		variable	variable	C1
9-1146			F			1.2			1	1	7		2.0			
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Volatile Organic Compounds (VOC)

Equipment Description/	SCC			Actual E	missions		Opera	ating Sche	edule (Act	tual)		TOSD	Oper	ating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9250 East Gen Plant	2-01-001-02	Diesel	S	0.20	105.67		variable	variable						variable	variable	C1
9-1155			F			13.9			1	2	2	182.10	15.2			
9250 East Gen Plant (2)	2-01-001-02	Diesel	S	0.78	403.70		variable	variable						variable	variable	C1
9-1116			F			15.5			1	9	9	182.10	14.0			
East Gen Plant (#15)	2-01-001-02	Diesel	S	0.00	0.58		variable	variable						variable	variable	C1
9-1136			F			3.2			1	0	2	1.06	2.0			
9250 L/S Engine	2-01-001-02	Diesel	S	0.00	0.31		variable	variable						variable	variable	C1
9-1156			F			1.7			1	0	3	0.00	2.0			
9800 Cafeteria	3-02-910-01	Natural	S	0.15	5.00		variable	variable						variable	variable	C3
8-0363		Gas	F			2.0			5	12	60	5.00	2.0			
			S													
			F													
			S													
			F													
			S													
			F													
			S													
			F													
			S													
			F													
Total																
10141				3.30	1229.54							733.31				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Carbon Monoxide (CO)

Equipment Description/	SCC			Actual E	missions		Opera	ating Sche	edule (Act	tual)		TOSD	Opei	ating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9900 Boiler #1	1-03-006-03	Natural	S	0.02	0.98		variable	variable				N/A	N/A	variable	variable	C3
5-0644		Gas	F			24.0			7	52	365					
9900 Boiler #2	1-03-006-03	Natural	S	0.00	19.50		variable	variable				N/A	N/A	variable	variable	C3
5-0645		Gas	F			24.0			7	52	365					
9807 Boiler #1	1-03-006-02	Natural	S	0.04	0.48		variable	variable				N/A	N/A	variable	variable	C1
5-0502		Gas	F			24.0			7	26	183					
9807 Boiler #1	1-03-005-02	No. 2	S	0.00	0.44		variable	variable				N/A	N/A	variable	variable	C1
5-0502		Fuel Oil	F			24.0			7	0	2					
9807 Boiler #2	1-03-006-02	Natural	S	0.01	0.26		variable	variable				N/A	N/A	variable	variable	C1
5-0503		Gas	F			24.0			7	13	88					
9807 Boiler #2	1-03-005-02	No. 2	S	0.00	0.46		variable	variable				N/A	N/A	variable	variable	C1
5-0503		Fuel Oil	F			24.0			7	0	2					
9807 Boiler #3	1-03-006-02	Natural	S	0.08	1.12		variable	variable				N/A	N/A	variable	variable	C1
5-0504		Gas	F			24.0			7	20	138					
9807 Boiler #3	1-03-005-02	No. 2	S	0.00	0.56		variable	variable				N/A	N/A	variable	variable	C1
5-0504		Fuel Oil	F			24.0			7	0	2					
9807 Boiler #4	1-03-006-02	Natural	S	0.12	1.17		variable	variable				N/A	N/A	variable	variable	C1
5-0505		Gas	F			24.0			7	29	204					
9807 Boiler #4	1-03-005-02	No. 2	S	0.00	0.23		variable	variable				N/A	N/A	variable	variable	C1
5-0505		Fuel Oil	F			24.0			7	0	2					
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Carbon Monoxide (CO)

Equipment Description/	SCC			Actual E	missions		Oper	ating Sche	dule (Act	ual)		TOSD	Opei	ating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9960 Boiler #1	1-03-006-03	Natural	S	0.11	1.43		variable	variable				N/A	N/A	variable	variable	C3
5-0891		Gas	F			24.0			7	23	160					
9960 Boiler #2	1-03-006-03	Natural	S	0.11	1.34		variable	variable				N/A	N/A	variable	variable	C3
5-0900		Gas	F			24.0			7	23	159					
9960 Boiler #3	1-03-006-03	Natural	S	0.09	1.12		variable	variable				N/A	N/A	variable	variable	C3
5-0892		Gas	F			24.0			7	23	160					
9960 Boiler #4	1-03-006-03	Natural	S	0.12	1.50		variable	variable				N/A	N/A	variable	variable	C3
5-0900		Gas	F			24.0			7	23	160					
9817 Boiler	1-03-006-02	Natural	S	0.00	0.03		variable	variable				N/A	N/A	variable	variable	C3
5-0674		Gas	F			21.3			7	7	50					
9816 South Gen Plant	2-01-001-02	Diesel	S	0.22	134.60		variable	variable				N/A	N/A	variable	variable	C3
9-1035			F			36.0			7	0	3					
9950 North Gen Plant	2-01-001-02	Diesel	S	0.23	133.40		variable	variable				N/A	N/A	variable	variable	C1
9-1055			F			39.6			1	4	4					
9840 Engine	2-01-001-02	Diesel	S	0.06	12.27		variable	variable				N/A	N/A	variable	variable	C1
9-0918			F			1.8			1	9	9					
Cooper Engine	2-01-001-02	Diesel	S	0.03	6.69		variable	variable				N/A	N/A	variable	variable	C3
9-0804			F			2.4			1	10	10					
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Carbon Monoxide (CO)

Equipment Description/	SCC			Actual E	missions		Opera	ating Sche	edule (Act	ual)		TOSD	Ope	rating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9816B Engine #1	2-01-001-02	Diesel	S	0.00	4.10	•	variable	variable				N/A	N/A	variable	variable	C1
9-0818			F			2.0			1	2	2		Ī			
9816B Engine #2	2-01-001-02	Diesel	S	0.00	4.10		variable	variable				N/A	N/A	variable	variable	C1
9-0819			F			2.0			1	2	2					
9816B Engine #3	2-01-001-02	Diesel	S	0.00	4.10		variable	variable				N/A	N/A	variable	variable	C1
9-0820			F			2.0			1	2	2					
9816B Engine #4	2-01-001-02	Diesel	S	0.00	4.10		variable	variable				N/A	N/A	variable	variable	C1
9-0821			F			2.0			1	2	2					
9816B Engine #5	2-01-001-02	Diesel	S	0.01	5.20		variable	variable				N/A	N/A	variable	variable	C1
9-0822			F			2.6			1	2	2					
9816B Engine #6	2-01-001-02	Diesel	S	0.00	4.00		variable	variable				N/A	N/A	variable	variable	C1
9-0823			F			2.0			1	1	1					
9800C Engine	2-01-001-02	Diesel	S	0.13	32.47		variable	variable				N/A	N/A	variable	variable	C3
9-1090			F			1.2			1	3	3					
9960 Engine	2-01-001-02	Diesel	S	0.01	3.11		variable	variable				N/A	N/A	variable	variable	C3
9-0806			F			1.3			1	8	8					
9703 Engine	2-01-001-02	Diesel	S	0.15	22.35		variable	variable				N/A	N/A	variable	variable	C3
9-0807			F			5.7			1	13	13					
9700 Engine	2-01-001-02	Diesel	S	0.07	14.16		variable	variable				N/A	N/A	variable	variable	C3
9-0442			F			3.0			1	10	10					
9000 Gen Yard	2-01-001-02	Diesel	S	5.27	389.64		variable	variable				N/A	N/A	variable	variable	C1
9-1091			F			21.8			1	11	11					
9000 L/S Engine	2-01-001-02	Diesel	S	0.02	4.62		variable	variable				N/A	N/A	variable	variable	C1
9-1092			F			3.1			1	7	7					
Total				continued	continued							continued				

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.

judgement

Fuel: Include emissions for each fuel used. If more than one fuel is 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
A9-Other, Specify
1/9/08

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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Carbon Monoxide (CO)

Equipment Description/	SCC			Actual E	missions		Opera	ating Sche	edule (Act	ual)		TOSD	Opei	rating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9220-Boiler	1-03-006-03	Natural	S	0.17	0.24		variable	variable				N/A	N/A	variable	variable	C3
5-0809		Gas	F			24.0			7	209	1460					
9230-Boiler	1-03-006-03	Natural	S	0.33	0.45		variable	variable				N/A	N/A	variable	variable	C3
5-0810		Gas	F			24.0			7	209	1460					
9259-Boiler	1-03-006-03	Natural	S	0.04	0.10		variable	variable				N/A	N/A	variable	variable	C3
5-0811		Gas	F			24.0			7	104	730					
9225-Boiler	1-03-006-03	Natural	S	0.16	0.30		variable	variable				N/A	N/A	variable	variable	C3
5-0823		Gas	F			24.0			7	156	1095					
VCP Engine #1	2-01-001-02	Diesel	S	0.02	4.97		variable	variable				N/A	N/A	variable	variable	C3
9-0967			F			1.6			1	1	9					
9250-Boilers	1-03-006-03	Natural	S	0.00	0.00		variable	variable				N/A	N/A	variable	variable	C3
5-0842		Gas	F			24.0			7	209	1460					
9700 Boiler	1-03-006-03	Natural	S	0.04	8.94		variable	variable				N/A	N/A	variable	variable	C3
5-0890		Gas	F			24.0			7	1	9					
			S													
			F													
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Carbon Monoxide (CO)

Equipment Description/	SCC			Actual E	missions		Opera	ating Sche	edule (Act	tual)		TOSD	Opei	rating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9230 L/S Engine	2-01-001-02	Diesel	S	0.01	3.03		variable	variable				N/A	N/A	variable	variable	C1
9-1117			F			4.5			1	2	12		Ī			
9225 L/S Engine	2-01-001-02	Diesel	S	0.02	6.60		variable	variable				N/A	N/A	variable	variable	C1
9-1137			F			4.1			1	1	7		Ī			
9210 L/S Engine	2-01-001-02	Diesel	S	0.00	0.70		variable	variable				N/A	N/A	variable	variable	C1
9-1146			F			1.2			1	1	7					
9250 East Gen Plant	2-01-001-02	Diesel	S	1.05	77.41		variable	variable				N/A	N/A	variable	variable	C1
9-1155			F			13.9			1	2	2		Ī			
9250 East Gen Plant (2)	2-01-001-02	Diesel	S	4.00	295.74		variable	variable				N/A	N/A	variable	variable	C1
9-1116			F			15.5			1	9	9					
East Gen Plant (#15)	2-01-001-02	Diesel	S	0.01	4.78		variable	variable				N/A	N/A	variable	variable	C1
9-1136			F			3.2			1	0	2		Ī			
9250 L/S Engine	2-01-001-02	Diesel	S	0.00	2.58		variable	variable				N/A	N/A	variable	variable	C1
9-1156			F			1.7			1	0	3					
			S				variable	variable				N/A	N/A	variable	variable	
			F													
			S				variable	variable				N/A	N/A	variable	variable	
			F													
			S				variable	variable				N/A	N/A	variable	variable	
			F										<u> </u>			
Total				12.78	1215.38							N/A				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Oxides of Sulfur (SOx)

Equipment Description/	SCC			Actual E	missions		Opera	ating Sche	dule (Act	ual)		TOSD	Opei	rating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9900 Boiler #1	1-03-006-03	Natural	S	0.00	0.01		variable	variable				N/A	N/A	variable	variable	C3
5-0644		Gas	F			24.0			7	52	365					
9900 Boiler #2	1-03-006-03	Natural	S	0.00	0.14		variable	variable				N/A	N/A	variable	variable	C3
5-0645		Gas	F			24.0			7	52	365					
9807 Boiler #1	1-03-006-02	Natural	S	0.11	1.24		variable	variable				N/A	N/A	variable	variable	C1
5-0502		Gas	F			24.0			7	26	183					
9807 Boiler #1	1-03-005-02	No. 2	S	0.02	20.24		variable	variable				N/A	N/A	variable	variable	C1
5-0502		Fuel Oil	F			24.0			7	0	2					
9807 Boiler #2	1-03-006-02	Natural	S	0.04	0.82		variable	variable				N/A	N/A	variable	variable	C1
5-0503		Gas	F			24.0			7	13	88					
9807 Boiler #2	1-03-005-02	No. 2	S	0.02	21.07		variable	variable				N/A	N/A	variable	variable	C1
5-0503		Fuel Oil	F			24.0			7	0	2					
9807 Boiler #3	1-03-006-02	Natural	S	0.18	2.58		variable	variable				N/A	N/A	variable	variable	C1
5-0504		Gas	F			24.0			7	20	138					
9807 Boiler #3	1-03-005-02	No. 2	S	0.03	25.36		variable	variable				N/A	N/A	variable	variable	C1
5-0504		Fuel Oil	F			24.0			7	0	2					
9807 Boiler #4	1-03-006-02	Natural	S	0.14	1.35		variable	variable				N/A	N/A	variable	variable	C1
5-0505		Gas	F			24.0			7	29	204					
9807 Boiler #4	1-03-005-02	No. 2	S	0.01	9.33		variable	variable				N/A	N/A	variable	variable	C1
5-0505		Fuel Oil	F			24.0			7	0	2					
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Oxides of Sulfur (SOX)

Equipment Description/	SCC			Actual E	missions		Opera	ating Sche	dule (Act	tual)		TOSD	Ope	rating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9960 Boiler #1	1-03-006-03	Natural	S	0.00	0.01		variable	variable				N/A	N/A	variable	variable	C3
5-0891		Gas	F			24.0			7	23	160					
9960 Boiler #2	1-03-006-03	Natural	S	0.00	0.01		variable	variable				N/A	N/A	variable	variable	C3
5-0900		Gas	F			24.0			7	23	159					
9960 Boiler #3	1-03-006-03	Natural	S	0.00	0.01		variable	variable				N/A	N/A	variable	variable	C3
5-0892		Gas	F			24.0			7	23	160					
9960 Boiler #4	1-03-006-03	Natural	S	0.00	0.01		variable	variable				N/A	N/A	variable	variable	C3
5-0900		Gas	F			24.0			7	23	160					
9817 Boiler	1-03-006-02	Natural	S	0.00	0.00		variable	variable				N/A	N/A	variable	variable	C3
5-0674		Gas	F			21.3			7	7	50					
Cooper Engine	2-01-001-02	Diesel	S	0.00	0.40		variable	variable				N/A	N/A	variable	variable	C3
9-0804			F			2.4			1	10	10					
9700 Engine	2-01-001-02	Diesel	S	0.00	0.84		variable	variable				N/A	N/A	variable	variable	C3
9-0442			F			3.0			1	10	10					
9960 Engine	2-01-001-02	Diesel	S	0.00	0.17		variable	variable				N/A	N/A	variable	variable	C3
9-0806			F			1.3			1	8	8					
9703 Engine	2-01-001-02	Diesel	S	0.01	1.33		variable	variable				N/A	N/A	variable	variable	C3
9-0807			F			5.7			1	13	13					
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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
A9-Other, Specify
1/9/08

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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Oxides of Sulfur (SOx)

Equipment Description/	SCC			Actual F	missions		Opera	ating Sche	edule (Act	ual)		TOSD	Opei	rating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/vr	Lbs/day	Hrs/dv	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dv	Hrs/dv	Start	End	Method
9816B Engine #1	2-01-001-02	Diesel	S	0.00	1.41	. ,	variable	variable	,	.,	, ,	N/A	N/A	variable	variable	C1
9-0818	1		F			2.0			1	2	2					
9816B Engine #2	2-01-001-02	Diesel	S	0.00	1.41		variable	variable				N/A	N/A	variable	variable	C1
9-0819	]		F			2.0			1	2	2					
9816B Engine #3	2-01-001-02	Diesel	S	0.00	1.41		variable	variable				N/A	N/A	variable	variable	C1
9-0820			F			2.0			1	2	2					
9816B Engine #4	2-01-001-02	Diesel	S	0.00	1.41		variable	variable				N/A	N/A	variable	variable	C1
9-0821			F			2.0			1	2	2					
9816B Engine #5	2-01-001-02	Diesel	S	0.00	1.79		variable	variable				N/A	N/A	variable	variable	C1
9-0822			F			2.6			1	2	2					
9816B Engine #6	2-01-001-02	Diesel	S	0.00	1.37		variable	variable				N/A	N/A	variable	variable	C1
9-0823			F			2.0			0	1	1					
9220-Boiler	1-03-006-03	Natural	S	0.00	0.00		variable	variable				N/A	N/A	variable	variable	C3
5-0809		Gas	F			24.0			7	209	1460					
9230-Boiler	1-03-006-03	Natural	S	0.00	0.00		variable	variable				N/A	N/A	variable	variable	C3
5-0810		Gas	F			24.0			7	209	1460					
9259-Boiler	1-03-006-03	Natural	S	0.00	0.00		variable	variable				N/A	N/A	variable	variable	C3
5-0811		Gas	F			24.0			7	104	730					
9225-Boiler	1-03-006-03	Natural	S	0.00	0.00		variable	variable				N/A	N/A	variable	variable	C3
5-0823		Gas	F			24.0			7	156	1095	•				
Total				continued	continued							continued				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Pollutant: Oxides of Sulfur (SOx)

Equipment Description/	SCC			Actual E	missions		Oper	ating Sche	edule (Act	ual)		TOSD	Ope	rating Sche	edule	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Hrs/dy	Start	End	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	Method
9250-Boilers	1-03-006-03	Natural	S	0.00	0.00		variable	variable				N/A	N/A	variable	variable	C3
5-0842		Gas	F			24.0			7	209	1460					
9700 Boiler 5-0890	1-03-006-03	Natural	S	0.00	0.06		variable	variable				N/A	N/A	variable	variable	C3
5-0890		Gas	F			24.0			7	1	9					
			-													
			-													
	-															
			-													
			-										-			
Total				0.57	93.76							N/A				

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.

Fuel: Include emissions for each fuel used. If more than one fuel is 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 A9-Other, Specify 1/9/08 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

## EMISSIONS CERTIFICATION REPORT Particulate Matter

Facility Name: National Security Agency

Facility ID#: 003-00317

Calendar Year: 2022
Pollutant: Particulate Matter

Equipment Description/	SCC			(Filterable P	ilterable M greater than	PM 10 - I (Filterable PM and 2.5	√ between 10		Filterable able PM	PM Cond	densable	Operation	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Days/yr	Method
9900 Boiler #1	1-03-006-03	Natural	S	-	-	0.00	0.02	-	-	0.00	0.07		C3
5-0644		Gas	F									365	
9900 Boiler #2	1-03-006-03	Natural	S	-	-	0.00	0.44	-	-	0.00	1.32		C3
5-0645		Gas	F									365	
9807 Boiler #1	1-03-006-02	Natural	S	0.09	0.96	-	-	-	-	-	-		C1
5-0502		Gas	F									183	
9807 Boiler #1	1-03-005-02	No. 2	S	0.00	1.56	-	-	-	-	-	-		C1
5-0502		Fuel Oil	F									2	
9807 Boiler #2	1-03-006-02	Natural	S	0.02	0.96	-	-	-	-	-	-		C1
5-0503		Gas	F									88	
9807 Boiler #2	1-03-005-02	No. 2	S	0.00	1.62	-	-	-	-	-	-		C1
5-0503		Fuel Oil	F									2	
9807 Boiler #3	1-03-006-02	Natural	S	0.15	2.25	-	-	-	-	-	-		C1
5-0504		Gas	F									138	
9807 Boiler #3	1-03-005-02	No. 2	S	0.00	1.95	-	-	-	-	-	-		C1
5-0504		Fuel Oil	F									2	
9807 Boiler #4	1-03-006-02	Natural	S	0.24	2.33	-	-	-	-	-	-		C1
5-0505		Gas	F									204	
9807 Boiler #4	1-03-005-02	No. 2	S	0.00	0.48	-	-	-	-	-	-		C1
5-0505		Fuel Oil	F									2	
Total				continued	continued	continued	continued	continued	continued	continued	continued		

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 is 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 A9-Other, Specify C1-User calculated based on source
test or other measurement
C2-User calculated based on material balance
using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering
judgement

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

## EMISSIONS CERTIFICATION REPORT Particulate Matter

Facility Name: National Security Agency

Facility ID#: 003-00317

Calendar Year: 2022

Pollutant: Particulate Matter

Equipment Description/	SCC			(Filterable P	ilterable M greater than nicron)	,			Filterable	PM Con	densable	Operation	Estimation
Registration No.	Number	Fuel		Tons/vr	Lbs/day	Tons/yr	Lbs/dav	Tons/yr	Lbs/dav	Tons/yr	Lbs/dav	Days/yr	Method
9960 Boiler #1	1-03-006-03	Natural	S	-	-	0.00	0.03	-	-	0.01	0.10	zaye, y.	C3
5-0891		Gas	F			0.00	0.00			0.01	0.10	160	- 00
9960 Boiler #2	1-03-006-03	Natural	S	-	-	0.00	0.03	-	-	0.01	0.09		C3
5-0900		Gas	F									159	
9960 Boiler #3	1-03-006-03	Natural	S	-	-	0.00	0.03	-	-	0.01	0.08		C3
5-0892		Gas	F									160	
9960 Boiler #4	1-03-006-03	Natural	S	-	-	0.00	0.03	-	-	0.01	0.10		C3
5-0900		Gas	F									160	
9817 Boiler	1-03-006-02	Natural	S	-	-	0.00	0.00	-	-	0.00	0.00		C3
5-0674		Gas	F									50	
9816 South Gen Plant	2-01-001-02	Diesel	S	0.08	51.28	-	-	-	-	-	-		C2
9-1035			F									3	
9950 North Gen Plant	2-01-001-02	Diesel	S	0.03	50.82	-	-	-	-	-	-		C2
9-1055			F									4	
9960 Engine	2-01-001-02	Diesel	S	0.00	0.04	0.00	0.01	0.00	0.16	0.00	0.03		C3
9-0806			F									8	
9703 Engine	2-01-001-02	Diesel	S	0.00	0.33	0.00	0.04	0.01	1.26	0.00	0.20		C3
9-0807			F									13	
Total				continued	continued	continued	continued	continued	continued	continued	continued		

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 is 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 A9-Other, Specify C1-User calculated based on source
test or other measurement
C2-User calculated based on material balance
using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering
judgement

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

## EMISSIONS CERTIFICATION REPORT Particulate Matter

Facility Name: National Security Agency

Facility ID#: 003-00317

Calendar Year: 2022
Pollutant: Particulate Matter

Equipment Description/	SCC			(Filterable P	Filterable M greater than nicron)	(Filterable Pl	Filterable M between 10 micron)	PM 2.5 - (Filtera	ble PM	PM Con	densable	Operation	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Days/yr	Method
9816B Engine #1	2-01-001-02	Diesel	S	0.00	0.51	-	-	-	-	-	-		C1
9-0818			F									2	
9816B Engine #2	2-01-001-02	Diesel	S	0.00	0.51	-	-	-	-	-	-		C1
9-0819			F									2	
9816B Engine #3	2-01-001-02	Diesel	S	0.00	0.51	-	-	-	-	-	-		C1
9-0820			F									2	
9816B Engine #4	2-01-001-02	Diesel	S	0.00	0.51	-	-	-	-	-	-		C1
9-0821			F									2	
9816B Engine #5	2-01-001-02	Diesel	S	0.00	0.65	-	-	-	-	-	-		C1
9-0822			F									2	
9816B Engine #6	2-01-001-02	Diesel	S	0.00	0.50	-	-	-	-	-	-		C1
9-0823			F									1	
9800C Engine	2-01-001-02	Diesel	S	0.02	5.07	-	-	-	-	-	-		C3
9-1090			F									3	
9700 Engine	2-01-001-02	Diesel	S	0.00	0.21	0.00	0.03	0.00	0.80	0.00	0.13		C3
9-0442			F									10	
9840 Engine	2-01-001-02	Diesel	S	0.00	0.71	-	-	-	-	-	-		C3
9-0918			F									9	
Total				continued	continued	continued	continued	continued	continued	continued	continued		

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 is 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 A9-Other, Specify C1-User calculated based on source
test or other measurement
C2-User calculated based on material balance
using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering
judgement

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

## EMISSIONS CERTIFICATION REPORT Particulate Matter

Facility Name: National Security Agency

Facility ID#: 003-00317

Calendar Year: 2022
Pollutant: Particulate Matter

Equipment Description/	SCC			(Filterable P	ilterable M greater than nicron)	and 2.5	и between 10 micron)	(Filtera 2.5 micro	,		densable	Operation	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Days/yr	Method
9000 Gen Yard	2-01-001-02	Diesel	S	-	-	0.36	148.43	-	-	-	-		C1
9-1091			F									11	
9000 L/S Engine	2-01-001-02	Diesel	S	-	-	0.00	0.28	-	-	-	-		C1
9-1092			F									7	
Cooper Engine	2-01-001-02	Diesel	S	0.00	0.10	0.00	0.01	0.00	0.38	0.00	0.06		C3
9-0804			F									10	
VCP Engine #1	2-01-001-02	Diesel	S	0.00	0.28	-	-	-	-	-	-		C1
9-0967			F									9	
9814A Baghouse #1	3-12-999-99		S	0.33	2.67	-	-	-	-	-	-		C1
9-0449			F									251	
9814A Baghouse #2	3-12-999-99		S	0.43	3.43	-	-	-	-	-	-		C1
9-0450			F									251	
9220-Boiler	1-03-006-03	Natural	S	-	-	0.00	0.01	-	-	0.01	0.02		C3
5-0809		Gas	F									1460	
9230-Boiler	1-03-006-03	Natural	S	-	-	0.01	0.01	-	-	0.02	0.03		C3
5-0810		Gas	F									1460	
9259-Boiler	1-03-006-03	Natural	S	-	-	0.00	0.00	-	-	0.00	0.01		C3
5-0811		Gas	F									730	
9225-Boiler	1-03-006-03	Natural	S	-	-	0.00	0.01	-	-	0.01	0.02		C3
5-0823		Gas	F									1095	
Total				continued	continued	continued	continued	continued	continued	continued	continued		

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 is 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 A9-Other, Specify C1-User calculated based on source
test or other measurement
C2-User calculated based on material balance
using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering
judgement

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

## EMISSIONS CERTIFICATION REPORT Particulate Matter

Facility Name: National Security Agency

Facility ID#: 003-00317

Facility ID#: 003-00317

Facility ID#: 003-00317

Equipment Description/	SCC			(Filterable P	ilterable M greater than nicron)	and 2.5	и between 10 micron)	(Filtera 2.5 micro	Filterable able PM on or less)		densable	Operation	Estimation
Registration No.	Number	Fuel		Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Days/yr	Method
9250-Boilers	1-03-006-03	Natural	S	-	-	0.00	0.00	-	-	0.00	0.00	1460	C3
5-0842		Gas	F										
9700 Boiler	1-03-006-03	Natural	S	-	-	0.00	0.20	-	-	0.00	0.61		C3
5-0890		Gas	F									9	
9230 L/S Engine	2-01-001-02	Diesel	S	0.00	0.18	-	-	-	-	-	-		C1
9-1117			F									12	
9225 L/S Engine	2-01-001-02	Diesel	S	0.00	0.29	-	-	-	-	-	-		C1
9-1137			F									7	
9210 L/S Engine	2-01-001-02	Diesel	S	0.00	0.27	-	-	-	-	-	-		C1
9-1146			F									7	
9250 East Gen Plant	2-01-001-02	Diesel	S	0.07	29.49	-	-	-	-	-	-		C1
9-1155			F									2	
9250 East Gen Plant (2)	2-01-001-02	Diesel	S	0.27	112.66	-	-	-	-	-	-		C1
9-1116			F									9	
East Gen Plant (#15)	2-01-001-02	Diesel	S	0.00	0.29								C1
9-1136	1		F									2	
9250 L/S Engine	2-01-001-02	Diesel	S	0.00	0.16								C1
9-1156	1		F									3	
9800 Cafeteria	3-02-910-01	Natural	S	-	-	0.15	5.00	-	-	-	-		C3
8-0363		Gas	F									60	
					.=. =.		4=4.00						
Total				1.77	273.56	0.53	154.62	0.01	2.59	0.08	2.85		

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 is 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 A9-Other, Specify C1-User calculated based on source
test or other measurement
C2-User calculated based on material balance
using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering
judgement

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

#### **TOXIC AIR POLLUTANTS**

Calendar Year: 2022

#### **EMISSIONS CERTIFICATION REPORT**

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Cadmium & compounds \*

Equipment Description/		А	ctual Emission			
Registration Number <sup>1</sup>					Control	%
Ü	Т	ons/yr	Lbs/day	Lbs/hr	Device**	Efficiency
9960 Boiler #1		0.0000	0.0000	0.0000		
5-0891						
9807 Boiler #1		0.0000	0.0004	0.0003		
5-0502						
9807 Boiler #2		0.0000	0.0003	0.0003		
5-0503						
9807 Boiler #3		0.0000	0.0007	0.0003		
5-0504						
9807 Boiler #4		0.0001	0.0006	0.0003		
5-0505						
9960 Boiler #2		0.0000	0.0000	0.0000		
5-0900						
9900 Boiler #1		0.0000	0.0000	0.0000		
5-0644						
9900 Boiler #2		0.0000	0.0003	0.0000		
5-0645						
9220-Boiler		0.0000	0.0000	0.0000		
5-0809						
9230-Boiler		0.0000	0.0000	0.0000		
5-0810						
9259-Boiler		0.0000	0.0000	0.0000		
5-0811						
TOTALS	со	ntinued	continued	continued		

<sup>\*</sup> Please attach all calculations.

S = Scrubber

B = Baghouse

ESP = Electrostatic Precipitation

A = Afterburner

C = Condenser

AD = Adsorbtion

O = Other

<sup>\*</sup> See Attachment 1 for the minimum reporting values.

<sup>\*\*</sup>Control Device

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

#### **TOXIC AIR POLLUTANTS**

Calendar Year: 2022

#### **EMISSIONS CERTIFICATION REPORT**

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Cadmium & compounds \*

Equipment Description/	A	ctual Emission			
Registration Number <sup>1</sup>				Control	%
Ü	Tons/yr	Lbs/day	Lbs/hr	Device**	Efficiency
9250-Boilers	0.0000	0.0000	0.0000		
5-0842	· ]				
9700 Boiler	0.0000	0.0001	0.0000		
5-0890	. T				
9817 Boiler	0.0000	0.0000	0.0000		
5-0674	·				
9960 Boiler #3	0.0000	0.0000	0.0000		
5-0892	·-				
9960 Boiler #4	0.0000	0.0000	0.0000		
5-0900	·-				
	-				
	_				!
TOTALS	0.0001	0.0024	0.0011		

<sup>\*</sup> Please attach all calculations.

S = Scrubber

B = Baghouse

ESP = Electrostatic Precipitation

A = Afterburner

C = Condenser

AD = Adsorbtion

O = Other

<sup>\*</sup> See Attachment 1 for the minimum reporting values.

<sup>\*\*</sup>Control Device

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

#### **TOXIC AIR POLLUTANTS**

Calendar Year: 2022

#### **EMISSIONS CERTIFICATION REPORT**

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Formaldehyde \*

Equipment Description/	А	ctual Emission			
Registration Number <sup>1</sup>				Control	%
3	Tons/yr	Lbs/day	Lbs/hr	Device**	Efficiency
9807 Boiler #1	0.00	0.029	0.025		
5-0502					
9807 Boiler #2	0.00	0.024	0.025		
5-0503					
9807 Boiler #3	0.00	0.051	0.026		
5-0504					
9807 Boiler #4	0.00	0.046	0.026		
5-0505					
9900 Boiler #1	0.00	0.001	0.000		
5-0644					
9900 Boiler #2	0.00	0.017	0.001		
5-0645					
9817 Boiler	0.00	0.000	0.000		
5-0674					
9800C Engine	0.00	0.01	0.01		
9-1090					
SPL Engine	0.00	0.012	0.004		
9-0442					
Cooper Ave Engine	0.00	0.006	0.002		
9-0804					
9960 Engine	0.00	0.003	0.002		
9-0806					
TOTALS	continued	continued	continued		

<sup>\*</sup> Please attach all calculations.

S = Scrubber

B = Baghouse

ESP = Electrostatic Precipitation

A = Afterburner

C = Condenser

AD = Adsorbtion

O = Other

<sup>\*</sup> See Attachment 1 for the minimum reporting values.

<sup>\*\*</sup>Control Device

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

# **TOXIC AIR POLLUTANTS**

Calendar Year: 2022

## **EMISSIONS CERTIFICATION REPORT**

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Formaldehyde \*

Equipment Description/	А	ctual Emission			
Registration Number <sup>1</sup>				Control	%
	Tons/yr	Lbs/day	Lbs/hr	Device**	Efficiency
9840 Engine	0.00	0.006	0.004		
9-0918					
9225 L/S Engine	0.00	0.007	0.002		
9-1337					
VCC Engine	0.00	0.003	0.002		
9-0967					
9230 L/S Engine	0.00	0.01	0.00		
9-1117					
9816B Engine #1	0.00	0.017	0.009		
9-0818					
9816B Engine #2	0.00	0.017	0.009		
9-0819					
9816B Engine #3	0.00	0.017	0.009		
9-0820					
9816B Engine #4	0.00	0.017	0.009		
9-0821					
9816B Engine #5	0.00	0.022	0.009		
9-0822					
9816B Engine #6	0.00	0.017	0.009		
9-0823					
9703 Engine	0.00	0.011	0.002		
9-0807					
TOTALS	continued	continued	continued		

<sup>\*</sup> Please attach all calculations.

S = Scrubber

B = Baghouse

ESP = Electrostatic Precipitation

A = Afterburner

C = Condenser

AD = Adsorbtion

O = Other

<sup>\*</sup> See Attachment 1 for the minimum reporting values.

<sup>\*\*</sup>Control Device

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

# **TOXIC AIR POLLUTANTS**

Calendar Year: 2022

## **EMISSIONS CERTIFICATION REPORT**

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Formaldehyde \*

Equipment Description/	A	ctual Emission			
Registration Number <sup>1</sup>				Control	%
ŭ	Tons/yr	Lbs/day	Lbs/hr	Device**	Efficiency
9816 South Gen Plant	0.01	4.783	0.199		
9-1035					
9950 North Gen Plant	0.01	6.320	0.263		
9-1055	7				
9210 L/S Engine	0.00	0.00	0.00		
9-1146	7				
9000 Gen Yard	0.01	2.03	0.08		
9-1091	7				
9000 L/S Engine	0.00	0.01	0.00		
9-1092	7				
9250 East Gen Plant	0.00	2.03	0.08		
9-1155	7				
9250 East Gen Plant (2)	0.01	2.03	0.08		
9-1116	7				
East Gen Plant (#15)	0.00	0.01	0.00		
9-1136	7				
9250 L/S Engine	0.00	0.00	0.00		
9-1156	7				
9960 Boiler #1	0.00	0.00	0.00		
5-0891	7				
9960 Boiler #2	0.00	0.00	0.00		
5-0900					
TOTALS	continued	continued	continued		

<sup>\*</sup> Please attach all calculations.

S = Scrubber

B = Baghouse

ESP = Electrostatic Precipitation

A = Afterburner

C = Condenser

AD = Adsorbtion

O = Other

<sup>\*</sup> See Attachment 1 for the minimum reporting values.

<sup>\*\*</sup>Control Device

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

# **TOXIC AIR POLLUTANTS**

Calendar Year: 2022

## **EMISSIONS CERTIFICATION REPORT**

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Formaldehyde \*

Equipment Description/	А	ctual Emission	S		
Registration Number <sup>1</sup>				Control	%
	Tons/yr	Lbs/day	Lbs/hr	Device**	Efficiency
9220-Boiler	0.00	0.00	0.00		
5-0809					
9230-Boiler	0.00	0.00	0.00		
5-0810					
9259-Boiler	0.00	0.00	0.00		
5-0811					
9250-Boilers	0.00	0.00	0.00		
5-0842					
9700 Boiler	0.00	0.01	0.00		
5-0890					
9960 Boiler #3	0.00	0.00	0.00		
5-0892					
9960 Boiler #4	0.00	0.00	0.00		
5-0900					
	0.05	17.58	0.91		
TOTALS	2.30		3.3.		

<sup>\*</sup> Please attach all calculations.

S = Scrubber

B = Baghouse

ESP = Electrostatic Precipitation

A = Afterburner

C = Condenser

AD = Adsorbtion

O = Other

<sup>\*</sup> See Attachment 1 for the minimum reporting values.

<sup>\*\*</sup>Control Device

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

TOXIC AIR POLLUTANTS									
MDE's Plant Level Thresholds									
		nreshold	Site Specific						
HAP	Lbs/hour	Tons/year	Actual tpy	Report?					
1,3-Butadiene	0.01	0.001	0.000	no					
Acenaphthene	0.001	0.01	0.00						
Acenaphthylene	0.01	0.1	0.0	no					
Acetaldehyde	0.1	0.1	0.0						
Acrolein	0.001	0.01	0.00						
Anthracene	0.001	0.01	0.00						
Benz(a)anthracene	0.001	0.001	0.000						
Benzene	0.01	0.1	0.0	no					
Benzo(a)pyrene	0.001	0.0001	0.0000						
Benzo(b)fluoranthene	0.1	0.001	0.000	no					
Benzo(g,h,i)perylene	0.001	0.1	0.0	no					
Benzo(k)fluoranthene	0.01	0.01	0.00	no					
Chrysene	0.001	0.01	0.00						
Dibenzo(a,h)anthracene	0.0001	0.0001	0.0000	no					
Ethylbenzene	1	10	0	no					
Fluoranthene	0.1	0.1	0.0	no					
Fluorene	0.001	0.01	0.00	no					
Formaldehyde	0.001	0.01	0.05	yes					
Hexane	1	10	0	no					
Indeno(1,2,3-c,d)pyrene	0.001	0.001	0.000						
Naphthalene	0.1	1	0	no					
Phenanathrene	0.01	0.01	0.00	no					
Pyrene	0.001	0.01	0.00	no					
Toulene	1	10	0	no					
Xylene	1	10		no					
Arsenic	0.0001	0.0001	0.0000						
Beryllium	0.00001	0.0001	0.0000						
Cadmium	0.0001	0.0001	0.0001						
Chromium	0.001	0.01	0.00						
Cobalt	0.0001	0.001	0.000						
Copper	0.001	0.01	0.00						
Lead	0.0001		0.000						
Manganese	0.001	0.01	0.00						
Mercury	0.0001	0.001	0.000						
Nickel	0.001	0.001	0.000						
Selenium	0.001	0.01	0.00						
Zinc	0.01	0.1	0.0	no					

## **BILLABLE TOXIC AIR POLLUTANTS**

#### **EMISSIONS CERTIFICATION REPORT**

Facility Name: National Security Agency Facility ID#: 003-00317

	CAS		Ad	ctual Emission	IS	Estimation
Chemical Name	Number		Tons/year	Lbs/day	Lbs/hr	Method
		S				
carbon disulfide	75-15-0	F				
		S				
carbonyl sulfide	463-58-1	F				
		S				
chlorine	7782-50-5	F				
		S				
cyanide compounds	57-12-5	F				
		S				
hydrochloric acid	7647-01-0	F				
		S				
hydrogen fluoride	7664-39-3	F				
		S				
methyl chloroform	71-55-6	F				
		S				
methylene chloride	75-09-2	F				
		S				
perchloroethylene	127-184	F				
l	7000 54 0	S				
phosphine	7803-51-2	F				
	7550 45 0	S				
titanium tetrachloride	7550-45-0	F				L
TOTALS			0.00	0.00	0.00	

S-Stack Emissions

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.

1/09/08

### **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 A9-Other, Specify

C1-User calculated based on source test of 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

Calendar Year:

2022

C5-User calculated based on a State or local agency factor

C6-New construction, not operational

C7-Source closed, operation ceased

C8-Computer calculated based on standard

This form to include only the eleven chemicals identified.

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

Facility Name: National Security Agency

# **GREENHOUSE GAS AIR POLLUTANTS**

**EMISSIONS CERTIFICATION REPORT** 

Facility ID#: 003-00317 Pollutant: Carbon Dioxide \*

Equipment Description/		Actual Emissions				
Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr		
9900 Boiler #1		, , .	,			
5-0644		31.09	1405.95	58.58		
9900 Boiler #2						
5-0645		1.51	27858.46	1160.77		
9807 Boiler #1						
5-0502		1853.01	20009.98	7184.35		
9807 Boiler #2						
5-0503		469.90	10481.11	7184.35		
9807 Boiler #3						
5-0504		3364.78	48111.18	7184.35		
9807 Boiler #4						
5-0505		5815.86	56362.07	7184.35		
9960 Boiler #1						
5-0891		163.98	2048.72	85.36		
9960 Boiler #2			, , , , , , ,			
5-0900		152.82	1916.90	79.87		
9960 Boiler #3		407.00	4505.50	00.40		
5-0892		127.80	1595.52	66.48		
9960 Boiler #4		174 40	0447.05	00.40		
5-0900		171.42	2147.85	89.49		
TOTALS		continued	continued	continued		

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

# **GREENHOUSE GAS AIR POLLUTANTS**

**EMISSIONS CERTIFICATION REPORT** 

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Carbon Dioxide \*

Equipment Description/		Actual Emissions			
Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr	
9817 Boiler		·	j		
5-0674		1.12	44.63	2.10	
9816 South Gen Plant					
9-1035		36.89	33683.53	934.36	
9950 North Gen Plant					
9-1055		55.43	48140.62	1214.14	
9816B Engine #1					
9-0818		7.30	7295.53	3558.80	
9816B Engine #2					
9-0819		7.00	6998.50	3413.91	
9816B Engine #3					
9-0820		6.96	6959.85	3395.05	
9816B Engine #4		7.04	7044.40	2400.00	
9-0821		7.01	7011.16	3420.08	
9816B Engine #5 9-0822		7.54	7536.50	2898.66	
9816B Engine #6					
9-0823		3.45	6897.68	3448.84	
Cooper Engine					
9-0804		6.49	1298.79	542.52	
9800C Engine			<u>-</u>		
9-1090		37.78	9445.05	6371.03	
TOTALS		continued	continued	continued	

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

This form must be used to report Greenhouse gas emissions:

Calendar Year:

2022

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

1/15/08

# **GREENHOUSE GAS AIR POLLUTANTS**

**EMISSIONS CERTIFICATION REPORT** 

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Carbon Dioxide \*

Equipment Description/	Actual Emissions			
Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr
9960 Engine		·	•	
9-0806		2.16	539.69	431.76
9703 Engine				
9-0807		28.20	4338.39	755.01
9700 Engine				
9-0442		13.74	2748.77	904.20
9840 Engine				
9-0918		11.72	2603.79	1473.85
9000 Gen Yard				
9-1091		577.65	300728.07	26800.84
9000 L/S Engine				
9-1092		2.96	846.30	2623.53
9220-Boiler				
5-0809		246.05	337.05	14.04
9230-Boiler				
5-0810		464.81	636.72	26.53
9259-Boiler				
5-0811		51.61	141.39	5.89
9225-Boiler				
5-0823		232.06	423.86	17.66
TOTALS		continued	continued	continued

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

# **GREENHOUSE GAS AIR POLLUTANTS**

## **EMISSIONS CERTIFICATION REPORT**

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Carbon Dioxide \*

Equipment Description/	Actual Emissions			
Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr
VCP Engine #1		·	j	
9-0967		6.66	1479.95	61.66
9250-Boilers				
5-0842		0.00	0.00	0.00
9700 Boiler				
5-0890		54.78	12764.83	531.87
9230 L/S Engine				
9-1117		6.59	2195.10	91.46
9225 L/S Engine				
9-1137		8.58	2451.80	102.16
9210 L/S Engine			504.07	00.00
9-1146		1.75	501.37	20.89
9250 East Gen Plant 9-1155		114.76	59743.60	26800.75
9250 E Gen Plant JOC		114.70	39743.00	20000.73
9-1116		438.44	228254.06	26800.84
ECB MC				
9-1136		0.96	876.61	36.53
ECB2 LS				
9-1156		0.71	473.20	19.72
TOTALS		14,593.31	929,334.15	146,996.59

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

# **GREENHOUSE GAS AIR POLLUTANTS**

**EMISSIONS CERTIFICATION REPORT** 

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Methane \*

Equipment Description/		Actual Emissions			
Registration Number <sup>1</sup>	•	Tons/yr	Lbs/day	Lbs/hr	
9900 Boiler #1		·	Í		
5-0644		0.00	0.03	0.00	
9900 Boiler #2					
5-0645		0.00	0.53	0.02	
9807 Boiler #1					
5-0502		0.09	1.01	0.04	
9807 Boiler #2					
5-0503		0.02	0.39	0.02	
9807 Boiler #3					
5-0504		0.19	2.72	0.11	
9807 Boiler #4					
5-0505		0.44	4.32	0.18	
9960 Boiler #1					
5-0891		0.00	0.04	0.00	
9960 Boiler #2					
5-0900		0.00	0.04	0.00	
9960 Boiler #3					
5-0892		0.00	0.03	0.00	
9960 Boiler #4					
5-0900		0.00	0.04	0.00	
TOTALS		continued	continued	continued	

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

# **GREENHOUSE GAS AIR POLLUTANTS**

### **EMISSIONS CERTIFICATION REPORT**

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Methane \*

Equipment Description/	,	Actual Emissions	
Registration Number <sup>1</sup>	Tons/yr	Lbs/day	Lbs/hr
9817 Boiler	·	•	
5-0674	0.00	0.00	0.00
9816 South Gen Plant			
9-1035	0.01	0.00	0.00
9950 North Gen Plant			
9-1055	0.01	0.00	0.00
9816B Engine #1			
9-0818	0.00	3.98	1.94
9816B Engine #2			
9-0819	0.00	3.82	1.86
9816B Engine #3			
9-0820	0.00	3.80	1.85
9816B Engine #4			
9-0821	0.00	3.82	1.87
9816B Engine #5	 		
9-0822	0.00	4.11	1.58
9816B Engine #6	 		
9-0823	0.00	3.76	1.88
Cooper Engine	 		
9-0804	0.00	0.06	0.03
9840 Engine	 		
9-0918	0.00	2.35	1.33
TOTALS	continued	continued	continued

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

# **GREENHOUSE GAS AIR POLLUTANTS**

**EMISSIONS CERTIFICATION REPORT** 

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Methane \*

Equipment Description/	Actual Emissions			
Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr
9800C Engine 9-1090		0.00	0.21	0.14
9960 Engine 9-0806		0.00	0.03	0.02
9703 Engine 9-0807		0.00	0.21	0.04
9700 Engine 9-0442		0.00	0.13	0.04
9000 Gen Yard 9-1091		1.02	0.27	0.01
9000 L/S Engine 9-1092		0.00	0.56	0.18
9220-Boiler 5-0809		0.00	0.01	0.00
9230-Boiler 5-0810		0.01	0.01	0.00
9259-Boiler 5-0811		0.00	0.00	0.00
9225-Boiler 5-0823		0.00	0.01	0.00
TOTALS		continued	continued	continued

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

Facility Name: National Security Agency

# **GREENHOUSE GAS AIR POLLUTANTS**

**EMISSIONS CERTIFICATION REPORT** 

Facility ID#: 003-00317 Pollutant: Methane \*

Equipment Description/		Actual Emissions		
Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr
VCP Engine #1		1 0115/y1	LDS/day	LD5/III
9-0967		0.00	0.00	0.00
9250-Boilers		0.00	0.00	0.00
5-0842		0.00	0.00	0.00
9700 Boiler		0.00	0.00	0.00
5-0890		0.00	0.24	0.01
9230 L/S Engine		0.00	0.21	0.01
9-1117		0.00	0.09	0.00
9225 L/S Engine				
9-1137		0.00	0.04	0.00
9210 L/S Engine				
9-1146		0.00	0.26	0.01
9250 East Gen Plant				
9-1155		0.20	0.05	0.00
9250 E Gen Plant JOC				
9-1116		0.78	0.20	0.01
ECB MC				
9-1136		0.00	0.58	0.02
ECB2 LS				
9-1156		0.00	0.31	0.01
TOTALS		2.82	38.07	13.24

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

# **GREENHOUSE GAS AIR POLLUTANTS**

### **EMISSIONS CERTIFICATION REPORT**

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Nitrous Oxide \*

Equipment Description/		Actual Emissions		
Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr
9900 Boiler #1		•		
5-0644		0.03	1.17	0.05
9900 Boiler #2				
5-0645		0.00	23.22	0.97
9807 Boiler #1				
5-0502		1.89	20.51	0.85
9807 Boiler #2				
5-0503		0.48	10.48	0.44
9807 Boiler #3				
5-0504		3.45	49.70	2.07
9807 Boiler #4				
5-0505		5.98	58.44	2.43
9960 Boiler #1				
5-0891		0.00	0.01	0.00
9960 Boiler #2				
5-0900		0.00	0.01	0.00
9960 Boiler #3				
5-0892		0.00	0.01	0.00
9960 Boiler #4				
5-0900		0.00	0.01	0.00
TOTALS		continued	continued	continued

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

Facility Name: National Security Agency

# **GREENHOUSE GAS AIR POLLUTANTS**

### **EMISSIONS CERTIFICATION REPORT**

Facility ID#: 003-00317 Pollutant: Nitrous Oxide \*

Equipment Description/		Actual Emissions		
Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr
9817 Boiler			,	
5-0674		0.00	0.00	0.00
9816 South Gen Plant				
9-1035		0.00	0.96	0.03
9950 North Gen Plant				
9-1055		0.00	0.83	0.02
9816B Engine #1				
9-0818		0.08	80.72	39.37
9816B Engine #2				
	9-0819		80.72	39.37
9816B Engine #3				
9-0820		0.08	80.72	39.37
9816B Engine #4				
9-0821		0.08	80.72	39.37
9816B Engine #5				
9-0822		0.10	102.37	39.37
9816B Engine #6				
9-0823		0.04	78.75	39.37
Cooper Engine				
9-0804		0.13	25.19	10.52
9840 Engine				
9-0918		0.10	22.42	12.69
TOTALS		continued	continued	continued

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

# **GREENHOUSE GAS AIR POLLUTANTS**

**EMISSIONS CERTIFICATION REPORT** 

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Nitrous Oxide \*

Equipment Description/		Actual Emissions		
Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr
9800C Engine		•	-	
9-1090		0.32	81.12	54.72
9960 Engine				
9-0806		0.06	14.64	11.71
9703 Engine				
9-0807		0.55	84.14	14.64
9700 Engine		0.07	50.04	
9-0442		0.27	53.31	17.54
9000 Gen Yard		4.00	0.07	0.04
9-1091		1.02	0.27	0.01
9000 L/S Engine		0.00	0.50	0.40
9-1092		0.00	0.56	0.18
9220-Boiler 5-0809		0.00	0.01	0.00
9230-Boiler		0.00	0.01	0.00
5-0810		0.01	0.01	0.00
9259-Boiler				
5-0811		0.00	0.00	0.00
9225-Boiler				
5-0823		0.00	0.01	0.00
TOTALS		continued	continued	continued

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

Facility Name: National Security Agency

# **GREENHOUSE GAS AIR POLLUTANTS**

### **EMISSIONS CERTIFICATION REPORT**

Facility ID#: 003-00317 Pollutant: Nitrous Oxide \*

Equipment Description/		Actual Emissions		
Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr
VCP Engine #1		1 0110/ 1	200,444	256/111
9-0967		0.03	5.68	0.24
9250-Boilers				
5-0842		0.00	0.00	0.00
9700 Boiler				
5-0890		0.00	0.07	0.00
9220 & 9230 L/S Engines				
9-1117		0.12	41.01	1.71
9225 L/S Engine				
9-1137		0.09	24.68	1.03
9210 L/S Engine				
9-1146		0.03	8.57	0.36
9250 East Gen Plant		0.00	0.05	0.00
9-1155		0.20	0.05	0.00
9250 E Gen Plant JOC 9-1116		0.78	0.20	0.01
ECB MC		0.04	7 77	0.22
9-1136		0.01	7.77	0.32
ECB2 LS 9-1156		0.01	4.19	0.17
TOTALS		16.01	1,043.27	368.98

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

# **GREENHOUSE GAS AIR POLLUTANTS**

**EMISSIONS CERTIFICATION REPORT** 

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Hydrofluorocarbons

Equipment Description/		Actual Emissions		
Equipment Description/ Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr
n/a		,		
TOTALS		0	0	0

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

# **GREENHOUSE GAS AIR POLLUTANTS**

**EMISSIONS CERTIFICATION REPORT** 

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Perfluorocarbons \*

Equipment Description/			Actual Emissions		
Equipment Description/ Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr	
n/a		,	,		
***************************************					
***************************************					
TOTALS		0	0	0	

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

# **GREENHOUSE GAS AIR POLLUTANTS**

**EMISSIONS CERTIFICATION REPORT** 

Facility Name: National Security Agency Facility ID#: 003-00317 Pollutant: Sulfur Hexafluoride \*

Equipment Description/			Actual Emissions		
Equipment Description/ Registration Number <sup>1</sup>		Tons/yr	Lbs/day	Lbs/hr	
n/a		,	,		
***************************************					
***************************************					
TOTALS		0	0	0	

<sup>&</sup>lt;sup>1</sup>Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

1/15/08

This form must be used to report Greenhouse gas emissions:

Calendar Year:

- carbon dioxide (CO2)
- methane (CH4)
- nitrous oxide (N2O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF6)
- \* Use a separate form for each pollutant.
- \* Please attach all calculations.

Boiler #1 (Registration #5-0502)

## **NOx Emissions**

(Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) NOS: 14,148,400 cf(NOS)/ 49953 cf(NOS)/hr \* 7.1 lb NOx/hr / 2000 lb/ton =1.01 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) 231 gal(NOS)/hr \* 0.02 tons per year 1,027 gal(NOS) / 7.1 lb NOx/hr / 2000 lb/ton =OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) 15,587,000 cf(OS) / 49953 cf(OS)/hr \* 5.6 lb NOx/hr / 2000 lb/ton =0.87 tons per vear (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) 0 gal(OS) / 231 gal(OS)/hr \* 3.4 lb NOx/hr / 2000 lb/ton =0.00 tons per year Total NOx: 1.89 tpy NOSD: (Tons of NOS NG NOx per Year) \* (2,000 pounds per ton) / (Days per year) 16.04 pounds per day 1.01 tpy \* 2000 lbs/ton / 125 day/year = (Tons of NOS Diesel NOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.02 tpy \* 2000 lbs/ton / 2 day/year = 15.79 pounds per day OSD: (Tons of OS NG NOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.87 tpy \* 30.21 pounds per day 2000 lbs/ton / 58 day/year = (Tons of OS Diesel NOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0.00 pounds per day 0 day/year = Total Diesel NOx: 15.79 ppd (average)

Total NG NOx:

Note: Emission Factors are derived from stack test results.

20.51 ppd (average)

Boiler #1 (Registration #5-0502)

### **VOC Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 14,148,400 cf(NOS)/ 49953 cf(NOS)/hr \* 0.1 lb VOC/hr / 2000 lb/ton = 0.01 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 231 gal(NOS)/hr \* 0.1 lb VOC/hr / 2000 lb/ton = 0.00 tons per year 1,027 gal(NOS) / OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 15,587,000 cf(OS) / 49953 cf(OS)/hr \* 0.5 lb VOC/hr / 2000 lb/ton = 0.08 tons per vear (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 0 gal(OS) / 231 gal(OS)/hr \* 0.00 tons per year 0.2 lb VOC/hr / 2000 lb/ton = **Total VOC:** 0.09 tpy NOSD: (Tons of NOS NG VOC per Year) \* (2,000 pounds per ton) / (Days per year) 0.23 pounds per day 125 day/year = 0.01 tpy \*2000 lbs/ton / (Tons of NOS Diesel VOC per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpv \* 2000 lbs/ton / 2 day/year = 0.22 pounds per day OSD: (Tons of OS NG VOC per Year) \* (2,000 pounds per ton) / (Days per year) 2.70 pounds per day 0.08 tpy \* 2000 lbs/ton / 58 day/year = (Tons of OS Diesel VOC per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day **Total Diesel VOC:** 0.22 ppd (average) **Total NG VOC:** 1.01 ppd (average)

Page 51 of 169

Note: Emission Factors are derived from stack test results.

Boiler #1 (Registration #5-0502)

## **CO Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 14,148,400 cf(NOS)/ 49953 cf(NOS)/hr \* 0.2 lb CO/hr / 2000 lb/ton =0.03 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 1,027 gal(NOS) / 231 gal(NOS)/hr \* 0.2 lb CO/hr / 2000 lb/ton = 0.00 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 15,587,000 cf(OS) / 49953 cf(OS)/hr \* 0.1 lb CO/hr / 2000 lb/ton = 0.02 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 0 gal(OS) / 231 gal(OS)/hr \* 0.2 lb CO/hr / 2000 lb/ton = 0.00 tons per year Total CO: 0.04 tpy NOSD: (Tons of NOS NG CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.45 pounds per day 0.03 tpy \* 125 day/year = 2000 lbs/ton / (Tons of NOS Diesel CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpv \* 2 day/year = 0.44 pounds per day 2000 lbs/ton / OSD: (Tons of OS NG CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.02 tpy \* 0.54 pounds per day 2000 lbs/ton / 58 day/year = (Tons of OS Diesel CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day Total Diesel CO: 0.44 ppd (average) **Total NG CO:** 0.48 ppd (average)

Page 52 of 169

Note: Emission Factors are derived from stack test results.

Boiler #1 (Registration #5-0502)

### **SOx Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 14,148,400 cf(NOS)/ 49953 cf(NOS)/hr \* 0.8 lb SOx/hr / 2000 lb/ton =0.11 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 231 gal(NOS)/hr \* 9.1 lb SOx/hr / 2000 lb/ton = 0.02 tons per year 1,027 gal(NOS) / OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 15,587,000 cf(OS) / 49953 cf(OS)/hr \* 0 lb SOx/hr / 2000 lb/ton =0.00 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 0 gal(OS) / 231 gal(OS)/hr \* 0.00 tons per year 7.9 lb SOx/hr / 2000 lb/ton =Total SOx: 0.13 tpy NOSD: (Tons of NOS NG SOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.11 tpy \* 125 day/year = 2000 lbs/ton / 1.81 pounds per day (Tons of NOS Diesel SOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.02 tpy \* 2 day/year = 20.24 pounds per day 2000 lbs/ton / OSD: (Tons of OS NG SOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 0.00 pounds per day 2000 lbs/ton / 58 day/year = (Tons of OS Diesel SOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day **Total Diesel SOx:** 20.24 ppd (average) 1.24 ppd (average) **Total NG SOx:** 

Page 53 of 169

Note: Emission Factors are derived from stack test results.

Boiler #1 (Registration #5-0502)

## **PM Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 14,148,400 cf(NOS)/ 49953 cf(NOS)/hr \* 0.4 lb PM/hr / 2000 lb/ton =0.06 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 231 gal(NOS)/hr \* 0.00 tons per year 1,027 gal(NOS) / 0.7 lb PM/hr / 2000 lb/ton =OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 15,587,000 cf(OS) / 49953 cf(OS)/hr \* 0.2 lb PM/hr / 2000 lb/ton =0.03 tons per vear (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 0 gal(OS) / 231 gal(OS)/hr \* 0.4 lb PM/hr / 2000 lb/ton =0.00 tons per year Total PM: 0.09 tpy NOSD: (Tons of NOS NG PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.90 pounds per day 0.06 tpy \* 2000 lbs/ton / 125 day/year = (Tons of NOS Diesel PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2 day/year = 1.56 pounds per day 2000 lbs/ton / OSD: (Tons of OS NG PM per Year) \* (2,000 pounds per ton) / (Days per year) 1.08 pounds per day 0.03 tpy \*2000 lbs/ton / 58 day/year = (Tons of OS Diesel PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day Total Diesel PM: 1.56 ppd (average) 0.96 ppd (average) Total NG PM:

Page 54 of 169

Note: Emission Factors are derived from stack test results.

Boiler #1 (Registration #5-0502)

## **CO2 Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 14,148,400 cf(NOS)/ 49953 cf(NOS)/hr \* 6952 lb CO2/hr / 2000 lb/ton = 984.56 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 231 gal(NOS)/hr \* 20.32 tons per year 1,027 gal(NOS) / 9139 lb CO2/hr / 2000 lb/ton = OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 15,587,000 cf(OS) / 49953 cf(OS)/hr \* 5436 lb CO2/hr / 2000 lb/ton = 848.13 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 0 gal(OS) / 231 gal(OS)/hr \* 0.00 tons per year 7210 lb CO2/hr / 2000 lb/ton = Total CO2: 1853.01 tpy NOSD: (Tons of NOS NG CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 984.56 tpy \* 2000 lbs/ton / 125 day/year = 15705.79 pounds per day (Tons of NOS Diesel CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 20.32 tpy \* 2 day/year = 20323.91 pounds per day 2000 lbs/ton / OSD: (Tons of OS NG CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 29330.03 pounds per day 848.13 tpv \* 2000 lbs/ton / 58 day/year = (Tons of OS Diesel CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 20009.98 ppd (average) Total CO2:

Total CO2:

Note: Emission Factors are derived from stack test results.

7184.35 pph (average)

Boiler #2 (Registration #5-0503)

## **NOx Emissions**

(Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) NOS: 4,489,127 cf(NOS)/ 49953 cf(NOS)/hr \* 7.1 lb NOx/hr / 2000 lb/ton =0.32 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) 1,070 gal(NOS) / 231 gal(NOS)/hr \* 7.1 lb NOx/hr / 2000 lb/ton = 0.02 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) 2,506,000 cf(OS) / 49953 cf(OS)/hr \* 5.6 lb NOx/hr / 2000 lb/ton =0.14 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 0 gal(OS)/ 231 gal(OS)/hr \* 3.4 lb NOx/hr / 2000 lb/ton = Total NOx: 0.48 tpy NOSD: (Tons of NOS NG NOx per Year) \* (2,000 pounds per ton) / (Days per year) 2000 lbs/ton / 0.32 tpy \* 42 day/year = 15.04 pounds per day (Tons of NOS Diesel NOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.02 tpy \* 2000 lbs/ton / 2 day/year = 16.44 pounds per day OSD: (Tons of OS NG NOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.14 tpy \* 45 day/year = 6.21 pounds per day 2000 lbs/ton / (Tons of OS Diesel NOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 16.44 ppd (average) **Total Diesel NOx:** Total NG NOx: 10.48 ppd (average)

Page 56 of 169

Note: Emission Factors are derived from stack test results.

Boiler #2 (Registration #5-0503)

### **VOC Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 4,489,127 cf(NOS)/ 49953 cf(NOS)/hr \* 0.1 lb VOC/hr / 2000 lb/ton = 0.00 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 1,070 gal(NOS) / 231 gal(NOS)/hr \* 0.1 lb VOC/hr / 2000 lb/ton = 0.00 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 2,506,000 cf(OS) / 49953 cf(OS)/hr \* 0.5 lb VOC/hr / 2000 lb/ton = 0.01 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 0 gal(OS)/ 231 gal(OS)/hr \* 0.2 lb VOC/hr / 2000 lb/ton = **Total VOC:** 0.02 tpy NOSD: (Tons of NOS NG VOC per Year) \* (2,000 pounds per ton) / (Days per year) 42 day/year = 0.00 tpy \* 2000 lbs/ton / 0.21 pounds per day (Tons of NOS Diesel VOC per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpv \* 2000 lbs/ton / 2 day/year = 0.23 pounds per day OSD: (Tons of OS NG VOC per Year) \* (2,000 pounds per ton) / (Days per year) 45 day/year = 0.55 pounds per day 0.01 tpy \*2000 lbs/ton / (Tons of OS Diesel VOC per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 0.23 ppd (average) **Total Diesel VOC: Total NG VOC:** 0.39 ppd (average)

Page 57 of 169

Note: Emission Factors are derived from stack test results.

Boiler #2 (Registration #5-0503)

## **CO Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 4,489,127 cf(NOS)/ 49953 cf(NOS)/hr \* 0.2 lb CO/hr / 2000 lb/ton =0.01 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 1,070 gal(NOS) / 231 gal(NOS)/hr \* 0.2 lb CO/hr / 2000 lb/ton = 0.00 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 2,506,000 cf(OS) / 49953 cf(OS)/hr \* 0.1 lb CO/hr / 2000 lb/ton = 0.00 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 0 gal(OS)/ 231 gal(OS)/hr \* 0.2 lb CO/hr / 2000 lb/ton = Total CO: 0.01 tpy NOSD: (Tons of NOS NG CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.42 pounds per day 0.01 tpy \* 2000 lbs/ton / 42 day/year = (Tons of NOS Diesel CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpv \* 2 day/year = 0.46 pounds per day 2000 lbs/ton / OSD: (Tons of OS NG CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.11 pounds per day 0.00 tpy \* 2000 lbs/ton / 45 day/year = (Tons of OS Diesel CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 0.46 ppd (average) **Total Diesel CO: Total NG CO:** 0.26 ppd (average)

Page 58 of 169

Note: Emission Factors are derived from stack test results.

Boiler #2 (Registration #5-0503)

## **SOx Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 4,489,127 cf(NOS)/ 49953 cf(NOS)/hr \* 0.8 lb SOx/hr / 2000 lb/ton =0.04 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 1,070 gal(NOS) / 231 gal(NOS)/hr \* 9.1 lb SOx/hr / 2000 lb/ton = 0.02 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 2,506,000 cf(OS) / 49953 cf(OS)/hr \* 0 lb SOx/hr / 2000 lb/ton = 0.00 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 0 gal(OS)/ 231 gal(OS)/hr \* 7.9 lb SOx/hr / 2000 lb/ton = Total SOx: 0.06 tpy NOSD: (Tons of NOS NG SOx per Year) \* (2,000 pounds per ton) / (Days per year) 2000 lbs/ton / 42 day/year = 0.04 tpy \* 1.69 pounds per day (Tons of NOS Diesel SOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.02 tpy \* 2 day/year = 21.07 pounds per day 2000 lbs/ton / OSD: (Tons of OS NG SOx per Year) \* (2,000 pounds per ton) / (Days per year) 45 day/year = 0.00 pounds per day 0.00 tpy \* 2000 lbs/ton / (Tons of OS Diesel SOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 21.07 ppd (average) **Total Diesel SOx: Total NG SOx:** 0.82 ppd (average)

Page 59 of 169

Note: Emission Factors are derived from stack test results.

Boiler #2 (Registration #5-0503)

## **PM Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 4,489,127 cf(NOS)/ 49953 cf(NOS)/hr \* 0.4 lb PM/hr / 2000 lb/ton =0.02 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 1,070 gal(NOS) / 231 gal(NOS)/hr \* 0.7 lb PM/hr / 2000 lb/ton =0.00 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 2,506,000 cf(OS) / 49953 cf(OS)/hr \* 0.2 lb PM/hr / 2000 lb/ton =0.01 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 0 gal(OS)/ 231 gal(OS)/hr \* 0.4 lb PM/hr / 2000 lb/ton = Total PM: 0.02 tpy NOSD: (Tons of NOS NG PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.85 pounds per day 0.02 tpy \* 2000 lbs/ton / 42 day/year = (Tons of NOS Diesel PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2 day/year = 1.62 pounds per day 2000 lbs/ton / OSD: (Tons of OS NG PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.22 pounds per day 0.01 tpy \*2000 lbs/ton / 45 day/year = (Tons of OS Diesel PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 1.62 ppd (average) **Total Diesel PM: Total NG PM:** 0.52 ppd (average)

Page 60 of 169

Note: Emission Factors are derived from stack test results.

Boiler #2 (Registration #5-0503)

## **CO2 Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 4,489,127 cf(NOS)/ 49953 cf(NOS)/hr \* 6952 lb CO2/hr / 2000 lb/ton = 312.39 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 231 gal(NOS)/hr \* 9139 lb CO2/hr / 2000 lb/ton = 1,070 gal(NOS) / 21.16 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 2,506,000 cf(OS) / 49953 cf(OS)/hr \* 5436 lb CO2/hr / 2000 lb/ton = 136.36 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 0 gal(OS)/ 231 gal(OS)/hr \* 7210 lb CO2/hr / 2000 lb/ton = 0.00 tons per year Total CO2: 469.90 tpy NOSD: (Tons of NOS NG CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 312.39 tpy \* 2000 lbs/ton / 42 day/year = 14729.53 pounds per day (Tons of NOS Diesel CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 21.16 tpy \* 2 day/year = 21156.72 pounds per day 2000 lbs/ton / OSD: (Tons of OS NG CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 45 day/year = 136.36 tpv \* 2000 lbs/ton / 6026.85 pounds per day (Tons of OS Diesel CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 10481.11 ppd (average) **Total CO2:** 

Total CO2:

Note: Emission Factors are derived from stack test results.

7184.35 pph (average)

Boiler #3 (Registration #5-0504)

## **NOx Emissions**

(Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) NOS: 22,187,300 cf(NOS)/ 49953 cf(NOS)/hr \* 7.1 lb NOx/hr / 2000 lb/ton =1.58 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) 231 gal(NOS)/hr \* 1,288 gal(NOS) / 7.1 lb NOx/hr / 2000 lb/ton = 0.02 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) 32,995,000 cf(OS) / 49953 cf(OS)/hr \* 5.6 lb NOx/hr / 2000 lb/ton =1.85 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 0 gal(OS) / 231 gal(OS)/hr \* 3.4 lb NOx/hr / 2000 lb/ton =Total NOx: 3.45 tpy NOSD: (Tons of NOS NG NOx per Year) \* (2,000 pounds per ton) / (Days per year) 2000 lbs/ton / 58.35 pounds per day 1.58 tpy \* 54 day/year = (Tons of NOS Diesel NOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.02 tpy \* 2000 lbs/ton / 2 day/year = 19.79 pounds per day OSD: (Tons of OS NG NOx per Year) \* (2,000 pounds per ton) / (Days per year) 1.85 tpy \* 84 day/year = 44.12 pounds per day 2000 lbs/ton / (Tons of OS Diesel NOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 19.79 ppd (average) **Total Diesel NOx:** Total NG NOx: 49.70 ppd (average)

Page 62 of 169

Note: Emission Factors are derived from stack test results.

Boiler #3 (Registration #5-0504)

### **VOC Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 22,187,300 cf(NOS)/ 49953 cf(NOS)/hr \* 0.1 lb VOC/hr / 2000 lb/ton = 0.02 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 1,288 gal(NOS) / 231 gal(NOS)/hr \* 0.00 tons per year 0.1 lb VOC/hr / 2000 lb/ton = OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 32,995,000 cf(OS) / 49953 cf(OS)/hr \* 0.5 lb VOC/hr / 2000 lb/ton = 0.17 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 0 gal(OS) / 231 gal(OS)/hr \* 0.2 lb VOC/hr / 2000 lb/ton = **Total VOC:** 0.19 tpy NOSD: (Tons of NOS NG VOC per Year) \* (2,000 pounds per ton) / (Days per year) 0.82 pounds per day 54 day/year = 0.02 tpy \* 2000 lbs/ton / (Tons of NOS Diesel VOC per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpv \* 2000 lbs/ton / 2 day/year = 0.28 pounds per day OSD: (Tons of OS NG VOC per Year) \* (2,000 pounds per ton) / (Days per year) 3.94 pounds per day 84 day/year = 0.17 tpy \* 2000 lbs/ton / (Tons of OS Diesel VOC per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 0.28 ppd (average) **Total Diesel VOC: Total NG VOC:** 2.72 ppd (average)

Page 63 of 169

Note: Emission Factors are derived from stack test results.

Boiler #3 (Registration #5-0504)

## **CO Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 22,187,300 cf(NOS)/ 49953 cf(NOS)/hr \* 0.2 lb CO/hr / 2000 lb/ton =0.04 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 1,288 gal(NOS) / 231 gal(NOS)/hr \* 0.2 lb CO/hr / 2000 lb/ton = 0.00 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 32,995,000 cf(OS) / 49953 cf(OS)/hr \* 0.1 lb CO/hr / 2000 lb/ton = 0.03 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 0 gal(OS) / 231 gal(OS)/hr \* 0.2 lb CO/hr / 2000 lb/ton = Total CO: 0.08 tpy NOSD: (Tons of NOS NG CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.04 tpy \* 2000 lbs/ton / 54 day/year = 1.64 pounds per day (Tons of NOS Diesel CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpv \* 2000 lbs/ton / 2 day/year = 0.56 pounds per day OSD: (Tons of OS NG CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.03 tpy \* 0.79 pounds per day 2000 lbs/ton / 84 day/year = (Tons of OS Diesel CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 0.56 ppd (average) **Total Diesel CO: Total NG CO:** 1.12 ppd (average)

Page 64 of 169

Note: Emission Factors are derived from stack test results.

Boiler #3 (Registration #5-0504)

### **SOx Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 22,187,300 cf(NOS)/ 49953 cf(NOS)/hr \* 0.8 lb SOx/hr / 2000 lb/ton =0.18 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 1,288 gal(NOS) / 231 gal(NOS)/hr \* 9.1 lb SOx/hr / 2000 lb/ton = 0.03 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 32,995,000 cf(OS) / 49953 cf(OS)/hr \* 0 lb SOx/hr / 2000 lb/ton = 0.00 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 0 gal(OS) / 231 gal(OS)/hr \* 7.9 lb SOx/hr / 2000 lb/ton = Total SOx: 0.20 tpy NOSD: (Tons of NOS NG SOx per Year) \* (2,000 pounds per ton) / (Days per year) 2000 lbs/ton / 0.18 tpy \* 54 day/year = 6.58 pounds per day (Tons of NOS Diesel SOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.03 tpy \* 2 day/year = 25.36 pounds per day 2000 lbs/ton / OSD: (Tons of OS NG SOx per Year) \* (2,000 pounds per ton) / (Days per year) 84 day/year = 0.00 pounds per day 0.00 tpy \* 2000 lbs/ton / (Tons of OS Diesel SOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 25.36 ppd (average) **Total Diesel SOx: Total NG SOx:** 2.58 ppd (average)

Page 65 of 169 Note: Emission Factors are derived from stack test results.

Boiler #3 (Registration #5-0504)

#### **PM Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 22,187,300 cf(NOS)/ 49953 cf(NOS)/hr \* 0.4 lb PM/hr / 2000 lb/ton =0.09 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 1,288 gal(NOS) / 231 gal(NOS)/hr \* 0.7 lb PM/hr / 2000 lb/ton =0.00 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 32,995,000 cf(OS) / 49953 cf(OS)/hr \* 0.2 lb PM/hr / 2000 lb/ton =0.07 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 0 gal(OS) / 231 gal(OS)/hr \* 0.4 lb PM/hr / 2000 lb/ton = Total PM: 0.16 tpy NOSD: (Tons of NOS NG PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.09 tpy \* 2000 lbs/ton / 54 day/year = 3.29 pounds per day (Tons of NOS Diesel PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 2 day/year = 1.95 pounds per day OSD: (Tons of OS NG PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.07 tpy \*2000 lbs/ton / 84 day/year = 1.58 pounds per day (Tons of OS Diesel PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 1.95 ppd (average) **Total Diesel PM: Total NG PM:** 2.25 ppd (average)

Note: Emission Factors are derived from stack test results.

Boiler #3 (Registration #5-0504)

#### **CO2 Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 22,187,300 cf(NOS)/ 49953 cf(NOS)/hr \* 6952 lb CO2/hr / 2000 lb/ton = 1543.97 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2.000 pounds per ton) 231 gal(NOS)/hr \* 9139 lb CO2/hr / 2000 lb/ton = 1,288 gal(NOS) / 25.47 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 32,995,000 cf(OS) / 49953 cf(OS)/hr \* 5436 lb CO2/hr / 2000 lb/ton = 1795.34 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 0 gal(OS) / 231 gal(OS)/hr \* 7210 lb CO2/hr / 2000 lb/ton = 0.00 tons per year Total CO2: 3364.78 tpy NOSD: (Tons of NOS NG CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 1,543.97 tpy \* 2000 lbs/ton / 54 day/year = 57139.87 pounds per day (Tons of NOS Diesel CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 2 day/year = 25471.02 pounds per day 25.47 tpy \* 2000 lbs/ton / OSD: (Tons of OS NG CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 84 day/year = 1.795.34 tpv \* 2000 lbs/ton / 42831.13 pounds per day (Tons of OS Diesel CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 0 day/year = 0.00 pounds per day 48111.18 ppd (average) **Total CO2:** 

Total CO2:

Note: Emission Factors are derived from stack test results.

7184.35 pph (average)

Boiler #4 (Registration #5-0505)

#### **NOx Emissions**

(Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) NOS: 17,227,900 cf(NOS)/ 49953 cf(NOS)/hr \* 7.1 lb NOx/hr / 2000 lb/ton =1.22 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) 20 gal(NOS) / 231 gal(NOS)/hr \* 0.00 tons per year 7.1 lb NOx/hr / 2000 lb/ton = OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) 84,695,000 cf(OS) / 49953 cf(OS)/hr \* 5.6 lb NOx/hr / 2000 lb/ton =4.75 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (NOx Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 231 gal(OS)/hr \* 523 gal(OS) / 3.4 lb NOx/hr / 2000 lb/ton =**Total NOx:** 5.98 tpy NOSD: (Tons of NOS NG NOx per Year) \* (2,000 pounds per ton) / (Days per year) 18.40 pounds per day 1.22 tpy \* 2000 lbs/ton / 133 day/year = (Tons of NOS Diesel NOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpv \* 2000 lbs/ton / 1 day/year = 0.60 pounds per day OSD: (Tons of OS NG NOx per Year) \* (2,000 pounds per ton) / (Days per year) 4.75 tpy \* 71 day/year = 133.18 pounds per day 2000 lbs/ton / (Tons of OS Diesel NOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 1 day/year = 7.70 pounds per day 4.15 ppd (average) **Total Diesel NOx:** Total NG NOx: 58.44 ppd (average)

Page 68 of 169

Note: Emission Factors are derived from stack test results.

Boiler #4 (Registration #5-0505)

#### **VOC Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 17,227,900 cf(NOS)/ 49953 cf(NOS)/hr \* 0.1 lb VOC/hr / 2000 lb/ton = 0.02 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 20 gal(NOS) / 231 gal(NOS)/hr \* 0.00 tons per year 0.1 lb VOC/hr / 2000 lb/ton = OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 84,695,000 cf(OS) / 49953 cf(OS)/hr \* 0.5 lb VOC/hr / 2000 lb/ton = 0.42 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (VOC Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 523 gal(OS) / 231 gal(OS)/hr \* 0.2 lb VOC/hr / 2000 lb/ton =**Total VOC:** 0.44 tpy NOSD: (Tons of NOS NG VOC per Year) \* (2,000 pounds per ton) / (Days per year) 0.26 pounds per day 0.02 tpy \* 2000 lbs/ton / 133 day/year = (Tons of NOS Diesel VOC per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpv \* 2000 lbs/ton / 1 day/year = 0.01 pounds per day OSD: (Tons of OS NG VOC per Year) \* (2,000 pounds per ton) / (Days per year) 71 day/year = 11.89 pounds per day 0.42 tpy \* 2000 lbs/ton / (Tons of OS Diesel VOC per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 1 day/year = 0.45 pounds per day 0.23 ppd (average) **Total Diesel VOC: Total NG VOC:** 4.32 ppd (average)

Page 69 of 169

Note: Emission Factors are derived from stack test results.

Boiler #4 (Registration #5-0505)

#### **CO Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 17,227,900 cf(NOS)/ 49953 cf(NOS)/hr \* 0.2 lb CO/hr / 2000 lb/ton =0.03 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 20 gal(NOS) / 231 gal(NOS)/hr \* 0.2 lb CO/hr / 2000 lb/ton = 0.00 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 84,695,000 cf(OS) / 49953 cf(OS)/hr \* 0.1 lb CO/hr / 2000 lb/ton = 0.08 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 523 gal(OS) / 231 gal(OS)/hr \* 0.2 lb CO/hr / 2000 lb/ton = Total CO: 0.12 tpy NOSD: (Tons of NOS NG CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.52 pounds per day 0.03 tpy \* 2000 lbs/ton / 133 day/year =(Tons of NOS Diesel CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpv \* 1 day/year = 0.02 pounds per day 2000 lbs/ton / OSD: (Tons of OS NG CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.08 tpy \* 2.38 pounds per day 2000 lbs/ton / 71 day/year = (Tons of OS Diesel CO per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 1 day/year = 0.45 pounds per day 0.23 ppd (average) **Total Diesel CO: Total NG CO:** 1.17 ppd (average)

Boiler #4 (Registration #5-0505)

#### **SOx Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 17,227,900 cf(NOS)/ 49953 cf(NOS)/hr \* 0.8 lb SOx/hr / 2000 lb/ton =0.14 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 20 gal(NOS) / 231 gal(NOS)/hr \* 9.1 lb SOx/hr / 2000 lb/ton = 0.00 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 84,695,000 cf(OS) / 49953 cf(OS)/hr \* 0 lb SOx/hr / 2000 lb/ton = 0.00 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (SOx Emission Factor) / (2,000 pounds per ton) 523 gal(OS) / 231 gal(OS)/hr \* 7.9 lb SOx/hr / 2000 lb/ton =0.01 tons per year Total SOx: 0.15 tpy NOSD: (Tons of NOS NG SOx per Year) \* (2,000 pounds per ton) / (Days per year) 2.07 pounds per day 0.14 tpy \* 2000 lbs/ton / 133 day/year = (Tons of NOS Diesel SOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 1 day/year = 0.77 pounds per day 2000 lbs/ton / OSD: (Tons of OS NG SOx per Year) \* (2,000 pounds per ton) / (Days per year) 71 day/year = 0.00 pounds per day 0.00 tpy \* 2000 lbs/ton / (Tons of OS Diesel SOx per Year) \* (2,000 pounds per ton) / (Days per year) 0.01 tpy \* 2000 lbs/ton / 1 day/year = 17.89 pounds per day 9.33 ppd (average) **Total Diesel SOx:** 1.35 ppd (average) **Total NG SOx:** 

Page 71 of 169

Note: Emission Factors are derived from stack test results.

Boiler #4 (Registration #5-0505)

#### **PM Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 17,227,900 cf(NOS)/ 49953 cf(NOS)/hr \* 0.4 lb PM/hr / 2000 lb/ton =0.07 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 20 gal(NOS) / 231 gal(NOS)/hr \* 0.7 lb PM/hr / 2000 lb/ton =0.00 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 84,695,000 cf(OS) / 49953 cf(OS)/hr \* 0.2 lb PM/hr / 2000 lb/ton =0.17 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (PM Emission Factor) / (2,000 pounds per ton) 0.00 tons per year 523 gal(OS) / 231 gal(OS)/hr \* 0.4 lb PM/hr / 2000 lb/ton = Total PM: 0.24 tpy NOSD: (Tons of NOS NG PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.07 tpy \* 2000 lbs/ton / 133 day/year =1.04 pounds per day (Tons of NOS Diesel PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 1 day/year = 0.06 pounds per day 2000 lbs/ton / OSD: (Tons of OS NG PM per Year) \* (2,000 pounds per ton) / (Days per year) 4.76 pounds per day 0.17 tpy \*2000 lbs/ton / 71 day/year = (Tons of OS Diesel PM per Year) \* (2,000 pounds per ton) / (Days per year) 0.00 tpy \* 2000 lbs/ton / 1 day/year = 0.91 pounds per day 0.48 ppd (average) **Total Diesel PM:** 2.33 ppd (average) **Total NG PM:** 

Boiler #4 (Registration #5-0505)

#### **CO2 Emissions**

Non-OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 17,227,900 cf(NOS)/ 49953 cf(NOS)/hr \* 6952 lb CO2/hr / 2000 lb/ton = 1198.85 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2.000 pounds per ton) 20 gal(NOS) / 231 gal(NOS)/hr \* 9139 lb CO2/hr / 2000 lb/ton = 0.39 tons per year OS: (Cubic Feet of Natural Gas consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 84,695,000 cf(OS) / 49953 cf(OS)/hr \* 5436 lb CO2/hr / 2000 lb/ton = 4608.46 tons per year (Gallons of #2 Oil consumed) / (Fuel Usage Rate) \* (CO2 Emission Factor) / (2,000 pounds per ton) 231 gal(OS)/hr \* 523 gal(OS) / 7210 lb CO2/hr / 2000 lb/ton = 8.16 tons per year Total CO2: 5815.86 tpy NOSD: (Tons of NOS NG CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 1,198.85 tpy \* 2000 lbs/ton / 133 day/year =18016.57 pounds per day (Tons of NOS Diesel CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 1 day/year = 771.49 pounds per day 0.39 tpy \* 2000 lbs/ton / OSD: (Tons of OS NG CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 71 day/year = 4,608.46 tpy \* 2000 lbs/ton / 129284.70 pounds per day (Tons of OS Diesel CO2 per Year) \* (2,000 pounds per ton) / (Days per year) 8.16 tpy \* 2000 lbs/ton / 1 day/year = 16323.27 pounds per day 56362.07 ppd (average) Total CO2:

Note: Emission Factors are derived from stack test results.

7184.35 pph (average)

Total CO2:

# **Emission Data - Main Boiler Plant**

Equipment: Boiler #1									
Union Iron Works									
Heat Input Rating - 85 MMBTU/hr									
MONTH	MONTH Oil Oil Gas Gas								
2022	(gal)	(days)	(cu. ft)	(days)					
Jan	995	1	763,400	30					
Feb	0	0	37,000	26					
March	0	0	5,278,000	24					
April	0	0	6,266,000	26					
May	0	0	2,784,000	20					
June	0	0	34,000	5					
July	0	0	31,000	4					
Aug	0	0	5,207,000	2					
Sept	0	0	1,265,000	2 7					
Oct	32	1	6,193,000	7					
Nov									
Dec 0 0 744,000									
Total(yr)	183								
Total(OS) 0 0 15,587,000									
	Equ	ipment: Boil	er #2						
	Ur	nion Iron Wo	orks						
	Heat Input	Rating - 85	MMBTU/hr						
MONTH	Oil	Oil	Gas	Gas					
2022	(gal)	(days)	(cu. ft)	(days)					
Jan	743	1	196,900	0					
Feb	0	0	859,000	3					
March	0	0	3,420,000	11					
April	0	0	1,020,000	17					
May	0	0	1,448,000	4					
June	0	0	11,000	18					
July	0	0	12,000	3					
Aug	0	0	1,000	2					
Sept	0	0	14,000	1					
Oct	327	1	13,200	0					
Nov	0	0	8	7					
Dec	0	0	19	21					
Total(yr)	1,070	2	6,995,127	88					
Total(OS)	0	0	2,506,000	45					

Equipment: Boiler #3								
Union Iron Works								
	Heat Input Rating - 85 MMBTU/hr							
MONTH	Oil Oil Gas Gas							
2022	(gal)	(days)	(cu. ft)	(days)				
Jan	1,240	1	210,300	8				
Feb	0	0	201,000	6				
March	0	0	12,456,000	13				
April	0	0	10,056,000	4				
May	0	0	168,000	11				
June	0	0	150,000	7				
July	0	0	17,649,000	30				
Aug	0	0	4,790,000	20				
Sept	0	0	182,000	12				
Oct	48	1	8,494,000	21				
Nov	0	0	787,000	3				
Dec	0	0	39,000	3				
Total(yr)	1,288	2	55,182,300	138				
Total(OS)	0	0	32,995,000	84				
	Equ	ipment: Boil	er #4					
		Keeler						
	Heat Input	t Rating - 90	MMBTU/hr					
MONTH	Oil	Oil	Gas	Gas				
2022	(gal)	(days)	(cu. ft)	(days)				
Jan	0	0	14,900	24				
Feb	0	0	0	27				
March	0	0	218,000	17				
April	523	1	12,279,000	15				
May	0	0	21,393,000	22				
June	0	0	21,479,000	12				
July	0	0	4,820,000	5				
Aug	0	0	4,076,000	2				
Sept	0	0	20,648,000	17				
Oct	20	1	13,001,000	8				
Nov	0	0	3,030,000	30				
Dec	0	0	964,000	27				
Total(yr)	543	2	101,922,900	204				
Total(OS)	523	1	84,695,000	71				

Note: Emission Factors are from stack testing or EPA emission factors, as noted.

	Ozone Sea	ison	Non-Ozone Seas	on	
	oil	gas	oil	gas	
lb NOx/hr	3.4	5.6	7.1	7.1	same for NO2
lb VOC/hr	0.2	0.5	0.1	0.1	same for CH4
lb SOx/hr	7.9	0	9.1	0.8	
lb CO/hr	0.2	0.1	0.2	0.2	
lb PM/hr	0.4	0.2	0.7	0.4	
lb CO2/hr	7210	5436	9139	6952	

Boiler #1 (Registration #5-0891)

**NOx Emissions** 

NOx (tpy): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

2,733,000 cf NG/yr \* 0.000032 lb NOx/cf / 2000 lb/ton = 0.04 tons per year

NOx (ppd): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor)

17,073 cf NG/day \* 0.000032 lb NOx/cf = 0.55 pounds per day

NOx (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (NOx Emission Factor)

13,918 cf NG/OS / OS days \* 0.000032 lb NOx/cf = 0.01 pounds per day

**VOC Emissions** 

VOC (tpy): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

2,733,000 cf NG/yr \* 0.0000055 lb VOC/cf / 2000 lb/ton = 0.01 tons per year

VOC (ppd): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor)

17,073 cf NG/day \* 0.0000055 lb VOC/cf = 0.09 pounds per day

VOC (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (VOC Emission Factor)

13,918 cf NG/OS / OS days \* 0.0000055 lb VOC/cf = 0.00 pounds per day

**CO Emissions** 

CO (tpy): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

2,733,000 cf NG/yr \* 0.000084 lb CO/cf / 2000 lb/ton = 0.11 tons per year

CO (ppd): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor)

17,073 cf NG/day \* 0.000084 lb CO/cf = 1.43 pounds per day

**SOx Emissions** 

SOx (tpy): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

2,733,000 cf NG/yr \* 0.0000006 lb SOx/cf / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor)

17,073 cf NG/day \* 0.0000006 lb SOx/cf = 0.01 pounds per day

PM10 Emissions

PM10 (tpy): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor) / (2,000 pounds per ton)

2,733,000 cf NG/yr \* 0.0000019 lb PM10/cf/2000 lb/ton = 0.00 tons per year

PM10 (ppd): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor)

17,073 cf NG/day \* 0.0000019 lb PM10/cf = 0.03 pounds per day

Boiler #1 (Registration #5-0891)

PM (Condensable) Emissions

PM(C) (tpy): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor) / (2,000 pounds per ton)

2,733,000 cf NG/yr \* 0.0000057 lb PM(C)/cf/2000 lb/ton = 0.01 tons per year

PM(C) (ppd): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor)

17,073 cf NG/day \* 0.0000057 lb PM(C)/cf = 0.10 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

2,733,000 cf NG/yr \* 0.12 lb CO2/cf / 2000 lb/ton = 163.98 tons per year

CO2 (ppd): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor)

17,073 cf NG/day \* 0.12 lb CO2/cf = 2048.72 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

2,733,000 cf NG/yr \* 0.0000023 lb CH4/cf / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor)

17,073 cf NG/day \* 0.0000023 lb CH4/cf = 0.04 pounds per day

**N2O Emissions** 

N2O (tpy): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor) / (2,000 pounds per ton)

2,733,000 cf NG/yr \* 0.00000064 lb N2O/cf / 2000 lb/ton = 0.00 tons per year

N2O (ppd): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor)

17,073 cf NG/day \* 0.00000064 lb N2O/cf = 0.01 pounds per day

Boiler #2 (Registration #5-0726/5-0900)

**NOx Emissions** 

NOx (tpy): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

2,547,000 cf NG/yr \* 0.000032 lb NOx/cf / 2000 lb/ton = 0.04 tons per year

NOx (ppd): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor)

15,974 cf NG/day \* 0.000032 lb NOx/cf = 0.51 pounds per day

NOx (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (NOx Emission Factor)

12,024 cf NG/OS / OS days \* 0.000032 lb NOx/cf = 0.01 pounds per day

**VOC Emissions** 

VOC (tpy): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

2,547,000 cf NG/yr \* 0.0000055 lb VOC/cf / 2000 lb/ton = 0.01 tons per year

VOC (ppd): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor)

15,974 cf NG/day \* 0.0000055 lb VOC/cf = 0.09 pounds per day

VOC (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (VOC Emission Factor)

12,024 cf NG/OS / OS days \* 0.0000055 lb VOC/cf = 0.00 pounds per day

**CO Emissions** 

CO (tpy): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

2,547,000 cf NG/yr \* 0.000084 lb CO/cf / 2000 lb/ton = 0.11 tons per year

CO (ppd): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor)

15,974 cf NG/day \* 0.000084 lb CO/cf = 1.34 pounds per day

**SOx Emissions** 

SOx (tpy): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

2,547,000 cf NG/yr \* 0.0000006 lb SOx/cf / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor)

15,974 cf NG/day \* 0.0000006 lb SOx/cf = 0.01 pounds per day

PM10 Emissions

PM10 (tpy): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor) / (2,000 pounds per ton)

2,547,000 cf NG/yr \* 0.0000019 lb PM10/cf/2000 lb/ton = 0.00 tons per year

PM10 (ppd): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor)

15,974 cf NG/day \* 0.0000019 lb PM10/cf = 0.03 pounds per day

Note: Emission Factors are from AP-42 for natural gas-fired boilers with a heat input rating of less than 100 MMBTU/hr with Low NOx burners and Flue gas recirculation.

Boiler #2 (Registration #5-0726/5-0900)

PM (Condensable) Emissions

PM(C) (tpy): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor) / (2,000 pounds per ton)

2,547,000 cf NG/yr \* 0.0000057 lb PM(C)/cf/2000 lb/ton = 0.01 tons per year

PM(C) (ppd): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor)

15,974 cf NG/day \* 0.0000057 lb PM(C)/cf = 0.09 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

2,547,000 cf NG/yr \* 0.12 lb CO2/cf / 2000 lb/ton = 152.82 tons per year

CO2 (ppd): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor)

15,974 cf NG/day \* 0.12 lb CO2/cf = 1916.90 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

2,547,000 cf NG/yr \* 0.0000023 lb CH4/cf / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor)

15,974 cf NG/day \* 0.0000023 lb CH4/cf = 0.04 pounds per day

**N2O Emissions** 

N2O (tpy): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor) / (2,000 pounds per ton)

2,547,000 cf NG/yr \* 0.00000064 lb N2O/cf / 2000 lb/ton = 0.00 tons per year

N2O (ppd): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor)

15,974 cf NG/day \* 0.00000064 lb N2O/cf = 0.01 pounds per day

Boiler #3 (Registration #5-0892)

**NOx Emissions** 

NOx (tpy): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

2,130,000 cf NG/yr \* 0.000032 lb NOx/cf / 2000 lb/ton = 0.03 tons per year

NOx (ppd): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor)

13,296 cf NG/day \* 0.000032 lb NOx/cf = 0.43 pounds per day

NOx (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (NOx Emission Factor)

11,211 cf NG/OS / OS days \* 0.000032 lb NOx/cf = 0.01 pounds per day

**VOC Emissions** 

VOC (tpy): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

2,130,000 cf NG/yr \* 0.0000055 lb VOC/cf / 2000 lb/ton = 0.01 tons per year

VOC (ppd): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor)

13,296 cf NG/day \* 0.0000055 lb VOC/cf = 0.07 pounds per day

VOC (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (VOC Emission Factor)

11,211 cf NG/OS / OS days \* 0.0000055 lb VOC/cf = 0.00 pounds per day

**CO Emissions** 

CO (tpy): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

2,130,000 cf NG/yr \* 0.000084 lb CO/cf / 2000 lb/ton = 0.09 tons per year

CO (ppd): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor)

13,296 cf NG/day \* 0.000084 lb CO/cf = 1.12 pounds per day

**SOx Emissions** 

SOx (tpy): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

2,130,000 cf NG/yr \* 0.0000006 lb SOx/cf / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor)

13,296 cf NG/day \* 0.0000006 lb SOx/cf = 0.01 pounds per day

PM10 Emissions

PM10 (tpy): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor) / (2,000 pounds per ton)

2,130,000 cf NG/yr \* 0.0000019 lb PM10/cf/2000 lb/ton = 0.00 tons per year

PM10 (ppd): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor)

13,296 cf NG/day \* 0.0000019 lb PM10/cf = 0.03 pounds per day

PM (Condensable) Emissions

PM(C) (tpy): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor) / (2,000 pounds per ton)

2,130,000 cf NG/yr \* 0.0000057 lb PM(C)/cf/2000 lb/ton = 0.01 tons per year

PM(C) (ppd): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor)

13,296 cf NG/day \* 0.0000057 lb PM(C)/cf = 0.08 pounds per day

Note: Emission Factors are from AP-42 for natural gas-fired boilers with a heat input rating of less than 100 MMBTU/hr with Low NOx burners and Flue gas recirculation.

Boiler #3 (Registration #5-0892)

**CO2 Emissions** 

CO2 (tpy): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

2,130,000 cf NG/yr \* 0.12 lb CO2/cf / 2000 lb/ton = 127.80 tons per year

CO2 (ppd): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor)

13,296 cf NG/day \* 0.12 lb CO2/cf = 1595.52 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

2,130,000 cf NG/yr \* 0.0000023 lb CH4/cf / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor)

13,296 cf NG/day \* 0.0000023 lb CH4/cf = 0.03 pounds per day

**N2O Emissions** 

N2O (tpy): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor) / (2,000 pounds per ton)

2,130,000 cf NG/yr \* 0.00000064 lb N2O/cf / 2000 lb/ton = 0.00 tons per year

N2O (ppd): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor)

13,296 cf NG/day \* 0.00000064 lb N2O/cf = 0.01 pounds per day

Boiler #4 (Registration #5-0728/5-0900)

**NOx Emissions** 

NOx (tpy): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

2,857,000 cf NG/yr \* 0.000032 lb NOx/cf / 2000 lb/ton = 0.05 tons per year

NOx (ppd): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor)

17,899 cf NG/day \* 0.000032 lb NOx/cf = 0.57 pounds per day

NOx (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (NOx Emission Factor)

12,811 cf NG/OS / OS days \* 0.000032 lb NOx/cf = 0.01 pounds per day

**VOC Emissions** 

VOC (tpy): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

2,857,000 cf NG/yr \* 0.0000055 lb VOC/cf / 2000 lb/ton = 0.01 tons per year

VOC (ppd): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor)

17,899 cf NG/day \* 0.0000055 lb VOC/cf = 0.10 pounds per day

VOC (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (VOC Emission Factor)

12,811 cf NG/OS / OS days \* 0.0000055 lb VOC/cf = 0.00 pounds per day

**CO Emissions** 

CO (tpy): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

2,857,000 cf NG/yr \* 0.000084 lb CO/cf / 2000 lb/ton = 0.12 tons per year

CO (ppd): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor)

17,899 cf NG/day \* 0.000084 lb CO/cf = 1.50 pounds per day

**SOx Emissions** 

SOx (tpy): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

2,857,000 cf NG/yr \* 0.0000006 lb SOx/cf / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor)

17,899 cf NG/day \* 0.0000006 lb SOx/cf = 0.01 pounds per day

PM10 Emissions

PM10 (tpy): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor) / (2,000 pounds per ton)

2,857,000 cf NG/yr \* 0.0000019 lb PM10/cf/2000 lb/ton = 0.00 tons per year

PM10 (ppd): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor)

17,899 cf NG/day \* 0.0000019 lb PM10/cf = 0.03 pounds per day

PM (Condensable) Emissions

PM(C) (tpy): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor) / (2,000 pounds per ton)

2,857,000 cf NG/yr \* 0.0000057 lb PM(C)/cf/2000 lb/ton = 0.01 tons per year

PM(C) (ppd): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor)

17,899 cf NG/day \* 0.0000057 lb PM(C)/cf = 0.10 pounds per day

Note: Emission Factors are from AP-42 for natural gas-fired boilers with a heat input rating of less than 100 MMBTU/hr with Low NOx burners and Flue gas recirculation.

Boiler #4 (Registration #5-0728/5-0900)

**CO2 Emissions** 

CO2 (tpy): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

2,857,000 cf NG/yr \* 0.12 lb CO2/cf / 2000 lb/ton = 171.42 tons per year

CO2 (ppd): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor)

17,899 cf NG/day \* 0.12 lb CO2/cf = 2147.85 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

2,857,000 cf NG/yr \* 0.0000023 lb CH4/cf / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor)

17,899 cf NG/day \* 0.0000023 lb CH4/cf = 0.04 pounds per day

**N2O Emissions** 

N2O (tpy): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor) / (2,000 pounds per ton)

2,857,000 cf NG/yr \* 0.00000064 lb N2O/cf / 2000 lb/ton = 0.00 tons per year

N2O (ppd): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor)

17,899 cf NG/day \* 0.00000064 lb N2O/cf = 0.01 pounds per day

# **Emission Data - Building 9960 Boilers**

Boiler:	#1		#2		#3		#4	
Reg.#:	5-0891		5-0900	)	5-0892		5-0900	
MONTH	Gas	Gas	Gas	Gas	Gas	Gas	Gas	Gas
2022	(cu. ft)	(hours)						
Jan	399,000	369.93	678,000	362.67	289,000	371.77	524,000	383.89
Feb	313,000	339.24	190,000	333.04	206,000	335.59	327,000	310.51
March	254,000	337.26	197,000	343.33	245,000	413.74	275,000	355.01
April	247,000	369.50	212,000	358.63	167,000	290.67	230,000	362.48
May	165,000	289.00	135,000	281.00	128,000	283.00	143,000	281.00
June	153,000	278.00	137,000	291.00	122,000	279.00	141,000	280.00
July	120,000	222.00	104,000	225.00	102,000	233.00	114,000	229.00
Aug	142,000	259.00	120,000	254.00	110,000	253.00	128,000	254.00
Sept	147,000	262.00	130,000	263.00	143,000	314.00	133,000	259.00
Oct	218,000	336.00	178,000	338.00	166,000	318.00	225,000	360.00
Nov	231,000	349.00	220,000	369.00	263,000	356.00	269,000	354.00
Dec	344,000	431.00	246,000	408.00	189,000	397.00	348,000	402.00
Total(yr)	2,733,000	3842	2,547,000	3827	2,130,000	3845	2,857,000	3831
Total(OS)	974,000	1680	838,000	1673	772,000	1653	889,000	1665

Gas usage based on Meter Readings

Boiler #1 (Registration #5-0644)

**NOx Emissions** 

NOx (tpy): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

518,200 cf NG/yr \* 0.0001 lb NOx/cf / 2000 lb/ton = 0.03 tons per year

NOx (ppd): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor)

11,716 cf NG/day \* 0.0001 lb NOx/cf = 1.17 pounds per day

NOx (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (NOx Emission Factor)

72,200 cf NG/OS / OS days \* 0.0001 lb NOx/cf = 1.06 pounds per day

**VOC Emissions** 

VOC (tpy): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

518,200 cf NG/yr \* 0.0000055 lb VOC/cf / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor)

11,716 cf NG/day \* 0.0000055 lb VOC/cf = 0.06 pounds per day

VOC (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (VOC Emission Factor)

72,200 cf NG/OS / OS days \* 0.0000055 lb VOC/cf = 0.06 pounds per day

**CO Emissions** 

CO (tpy): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

518,200 cf NG/yr \* 0.000084 lb CO/cf / 2000 lb/ton = 0.02 tons per year

CO (ppd): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor)

11,716 cf NG/day \* 0.000084 lb CO/cf = 0.98 pounds per day

**SOx Emissions** 

SOx (tpy): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

518,200 cf NG/yr \* 0.0000006 lb SOx/cf / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor)

11,716 cf NG/day \* 0.0000006 lb SOx/cf = 0.01 pounds per day

PM10 Emissions

PM10 (tpy): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor) / (2,000 pounds per ton)

518,200 cf NG/yr \* 0.0000019 lb PM10/cf/2000 lb/ton = 0.00 tons per year

PM10 (ppd): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor)

11,716 cf NG/day \* 0.0000019 lb PM10/cf = 0.02 pounds per day

PM (Condensable) Emissions

PM(C) (tpy): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor) / (2,000 pounds per ton)

518,200 cf NG/yr \* 0.0000057 lb PM(C)/cf/2000 lb/ton = 0.00 tons per year

PM(C) (ppd): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor)

11,716 cf NG/day \* 0.0000057 lb PM(C)/cf = 0.07 pounds per day

Page 84 of 169 Note: Emission Factors are from AP-42 for natural gas-fired boilers with a heat input rating of less than 10 MMBTU/hr.

Boiler #1 (Registration #5-0644)

**CO2 Emissions** 

CO2 (tpy): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

518,200 cf NG/yr \* 0.12 lb CO2/cf / 2000 lb/ton = 31.09 tons per year

CO2 (ppd): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor)

11,716 cf NG/day \* 0.12 lb CO2/cf = 1405.95 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

518,200 cf NG/yr \* 0.0000023 lb CH4/cf / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor)

11,716 cf NG/day \* 0.0000023 lb CH4/cf = 0.03 pounds per day

**N2O Emissions** 

N2O (tpy): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor) / (2,000 pounds per ton)

518,200 cf NG/yr \* 0.00000064 lb N2O/cf / 2000 lb/ton = 0.00 tons per year

N2O (ppd): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor)

11,716 cf NG/day \* 0.00000064 lb N2O/cf = 0.01 pounds per day

Boiler #2 (Registration #5-0645)

**NOx Emissions** 

NOx (tpy): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

25,150 cf NG/yr \* 0.0001 lb NOx/cf / 2000 lb/ton = 0.00 tons per year

NOx (ppd): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor)

232,154 cf NG/day \* 0.0001 lb NOx/cf = 23.22 pounds per day

NOx (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (NOx Emission Factor)

14,590 cf NG/OS / OS days \* 0.0001 lb NOx/cf = 21.88 pounds per day

**VOC Emissions** 

VOC (tpy): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

25,150 cf NG/yr \* 0.0000055 lb VOC/cf / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor)

232,154 cf NG/day \* 0.0000055 lb VOC/cf = 1.28 pounds per day

VOC (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (VOC Emission Factor)

14,590 cf NG/OS / OS days \* 0.0000055 lb VOC/cf = 1.20 pounds per day

**CO Emissions** 

CO (tpy): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

25,150 cf NG/yr \* 0.000084 lb CO/cf / 2000 lb/ton = 0.00 tons per year

CO (ppd): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor)

232.154 cf NG/dav \* 0.000084 lb CO/cf = 19.50 pounds per day

**SOx Emissions** 

SOx (tpy): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

25,150 cf NG/yr \* 0.0000006 lb SOx/cf / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor)

232,154 cf NG/day \* 0.0000006 lb SOx/cf = 0.14 pounds per day

**PM10 Emissions** 

PM10 (tpy): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor) / (2,000 pounds per ton)

25,150 cf NG/yr \* 0.0000019 lb PM10/cf/2000 lb/ton = 0.00 tons per year

PM10 (ppd): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor)

232,154 cf NG/day \* 0.0000019 lb PM10/cf = 0.44 pounds per day

PM (Condensable) Emissions

PM(C) (tpy): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor) / (2,000 pounds per ton)

25,150 cf NG/yr \* 0.0000057 lb PM(C)/cf/2000 lb/ton = 0.00 tons per year

PM(C) (ppd): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor)

232,154 cf NG/day \* 0.0000057 lb PM(C)/cf = 1.32 pounds per day

Page 86 of 169 Note: Emission Factors are from AP-42 for natural gas-fired boilers with a heat input rating of less than 10 MMBTU/hr.

Boiler #2 (Registration #5-0645)

**CO2 Emissions** 

CO2 (tpy): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

25,150 cf NG/yr \* 0.12 lb CO2/cf / 2000 lb/ton = 1.51 tons per year

CO2 (ppd): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor)

232,154 cf NG/day \* 0.12 lb CO2/cf = 27858.46 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

25,150 cf NG/yr \* 0.0000023 lb CH4/cf / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor)

232,154 cf NG/day \* 0.0000023 lb CH4/cf = 0.53 pounds per day

**N2O Emissions** 

N2O (tpy): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor) / (2,000 pounds per ton)

25,150 cf NG/yr \* 0.00000064 lb N2O/cf / 2000 lb/ton = 0.00 tons per year

N2O (ppd): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor)

232,154 cf NG/day \* 0.00000064 lb N2O/cf = 0.15 pounds per day

# **Emission Data - Building 9900 Boilers**

Boiler:	#1		#2		
Reg.#:	5-064	4	5-0645		
MONTH	Gas	Gas	Gas	Gas	
2022	(cu. ft)	days	(cu. ft)	(days)	
Jan	103,000	12	6,000	0.00	
Feb	78,000	9	3,000	0.04	
March	68,000	8	1,000	0.00	
April	50,000	6	900	0.00	
May	13,000	1	3,000	0.00	
June	200	0	5,500	0.07	
July	-	0	5,000	0.00	
Aug	-	0	100	0.00	
Sept	9,000	0	90	0.00	
Oct	40,000	0	100	0.00	
Nov	72,000	1	60	0.00	
Dec	85,000	8	400	0.00	
Total(yr)	518,200	44	25,150	0	
Total(OS)	72,200	7	14,590	0	

Note: Basis is 1050 BTU/cf.

Space Hooter	A nalvoja
Space Heater	Allalysis
2021	
Oct	76000
Nov	119000
Dec	233000
2022	
Jan	109000
Feb	81000
Mar	69000
Apr	50900
May	16000
Jun	5700
Jul	5000
Aug	100
Sep	9090
Total	773790
"Winter"	611000
SH? Yes	

<sup>\*</sup>Some data estimated due to inoperable meters

York Shipley Boiler (Registration #5-0450)

**NOx Emissions** 

NOx (tpy): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

913,040 cf NG/yr \* 0.000032 lb NOx/cf / 2000 lb/ton = 0.01 tons per year

NOx (ppd): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor)

106,374 cf NG/day \* 0.000032 lb NOx/cf = 3.40 pounds per day

NOx (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (NOx Emission Factor)

913,040 cf NG/OS / OS days \* 0.000032 lb NOx/cf = 5.75 pounds per day

**VOC Emissions** 

VOC (tpy): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

913,040 cf NG/yr \* 0.0000055 lb VOC/cf / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor)

106,374 cf NG/day \* 0.0000055 lb VOC/cf = 0.59 pounds per day

VOC (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (VOC Emission Factor)

913,040 cf NG/OS / OS days \* 0.0000055 lb VOC/cf = 0.99 pounds per day

**CO Emissions** 

CO (tpy): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

913,040 cf NG/yr \* 0.000084 lb CO/cf / 2000 lb/ton = 0.04 tons per year

CO (ppd): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor)

106.374 cf NG/day \* 0.000084 lb CO/cf = 8.94 pounds per day

**SOx Emissions** 

SOx (tpy): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

913,040 cf NG/yr \* 0.0000006 lb SOx/cf / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor)

106,374 cf NG/day \* 0.0000006 lb SOx/cf = 0.06 pounds per day

**PM10 Emissions** 

PM10 (tpy): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor) / (2,000 pounds per ton)

913,040 cf NG/yr \* 0.0000019 lb PM10/cf/2000 lb/ton = 0.00 tons per year

PM10 (ppd): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor)

106,374 cf NG/day \* 0.0000019 lb PM10/cf = 0.20 pounds per day

Note: Emission Factors are from AP-42 for natural gas-fired boilers with a heat input rating of less than 100 MMBTU/hr with Low NOx burners and Flue gas recirculation.

York Shipley Boiler (Registration #5-0450)

PM (Condensable) Emissions

PM(C) (tpy): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor) / (2,000 pounds per ton)

913,040 cf NG/yr \* 0.0000057 lb PM(C)/cf/2000 lb/ton = 0.00 tons per year

PM(C) (ppd): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor)

106,374 cf NG/day \* 0.0000057 lb PM(C)/cf = 0.61 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

913,040 cf NG/yr \* 0.12 lb CO2/cf / 2000 lb/ton = 54.78 tons per year

CO2 (ppd): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor)

106,374 cf NG/day \* 0.12 lb CO2/cf = 12764.83 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

913,040 cf NG/yr \* 0.0000023 lb CH4/cf / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor)

106,374 cf NG/day \* 0.0000023 lb CH4/cf = 0.24 pounds per day

**N2O Emissions** 

N2O (tpy): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor) / (2,000 pounds per ton)

913,040 cf NG/yr \* 0.00000064 lb N2O/cf / 2000 lb/ton = 0.00 tons per year

N2O (ppd): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor)

106,374 cf NG/day \* 0.00000064 lb N2O/cf = 0.07 pounds per day

# Emission Data - Building 9700 York Shipley Boiler

Equipment:	Unilux ZF 1400HS								
Reg.#:	5-0890								
Heat Input Rating:	14.	46 MMBTU	J/hr						
MONTH	On Call	On Call	Steam	Total Gas					
2014	(days)	(hr)	Prod (lbs)	(cu. ft)					
Jan	-	-	-	-					
Feb	-	-	-	-					
March	-	-	-	-					
April	1	6	2,629	3,040					
May	-	-	-	-					
June	-	-	22,491	26,000					
July	1	8	865	1,000					
Aug	8	192	758,557	883,000					
Sept	-	-	-	-					
Oct	-	-	-	-					
Nov	-	-	-	-					
Dec	-	-	-	-					
Total(yr)	10	206	784,543	913,040					
Total(OS)	10	206	784,543	913,040					

Gas usage based on SPL Meter Readings

# Emission Calculations - Building 9817 Fulton Boiler (Registration #5-0674)

**NOx Emissions** 

NOx (tpy): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

18,597 cf NG/yr \* 0.000032 lb NOx/cf / 2000 lb/ton = 0.00 tons per year

NOx (ppd): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor)

372 cf NG/day \* 0.000032 lb NOx/cf = 0.01 pounds per day

NOx (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (NOx Emission Factor)

9,000 cf NG/OS / OS days \* 0.000032 lb NOx/cf = 0.01 pounds per day

**VOC Emissions** 

VOC (tpy): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

18,597 cf NG/yr \* 0.0000055 lb VOC/cf / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor)

372 cf NG/day \* 0.0000055 lb VOC/cf = 0.00 pounds per day

VOC (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (VOC Emission Factor)

9,000 cf NG/OS / OS days \* 0.0000055 lb VOC/cf = 0.00 pounds per day

**CO Emissions** 

CO (tpy): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

18,597 cf NG/yr \* 0.000084 lb CO/cf / 2000 lb/ton = 0.00 tons per year

CO (ppd): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor)

372 cf NG/day \* 0.000084 lb CO/cf = 0.03 pounds per day

**SOx Emissions** 

SOx (tpy): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

18,597 cf NG/yr \* 0.0000006 lb SOx/cf / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor)

372 cf NG/day \* 0.0000006 lb SOx/cf = 0.00 pounds per day

**PM10 Emissions** 

PM10 (tpy): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor) / (2,000 pounds per ton)

18,597 cf NG/yr \* 0.0000019 lb PM10/cf/2000 lb/ton = 0.00 tons per year

PM10 (ppd): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor)

372 cf NG/day \* 0.0000019 lb PM10/cf = 0.00 pounds per day

Note: Emission Factors are from AP-42 for natural gas-fired boilers with a heat input rating of less than 100 MMBTU/hr with Low NOx burners and Flue gas recirculation.

# Emission Calculations - Building 9817 Fulton Boiler (Registration #5-0674)

## PM (Condensable) Emissions

PM(C) (tpy): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor) / (2,000 pounds per ton)

18,597 cf NG/yr \* 0.0000057 lb PM(C)/cf/2000 lb/ton = 0.00 tons per year

PM(C) (ppd): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor)

372 cf NG/day \* 0.0000057 lb PM(C)/cf = 0.00 pounds per day

#### **CO2 Emissions**

CO2 (tpy): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

18,597 cf NG/yr \* 0.12 lb CO2/cf / 2000 lb/ton = 1.12 tons per year

CO2 (ppd): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor)

372 cf NG/day \* 0.12 lb CO2/cf = 44.63 pounds per day

#### **CH4 Emissions**

CH4 (tpy): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

18,597 cf NG/yr \* 0.0000023 lb CH4/cf / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor)

372 cf NG/day \* 0.0000023 lb CH4/cf = 0.00 pounds per day

#### **N2O Emissions**

N2O (tpy): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor) / (2,000 pounds per ton)

18,597 cf NG/yr \* 0.00000064 lb N2O/cf / 2000 lb/ton = 0.00 tons per year

N2O (ppd): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor)

372 cf NG/day \* 0.00000064 lb N2O/cf = 0.00 pounds per day

# Emission Data - Building 9817 Fulton Boiler

Equipment:	Fulton (Model VMP80LE)								
Reg.#:	5-0674								
Heat Input Rating:	3.	5 MMBTU/I	hr						
MONTH	On Call	On Call	Steam	Total Gas					
2022	(days)	(hr)	Prod (lbs)	(cu. ft)					
Jan	8	192	83	97					
Feb	0	0	0	0					
March	0	0	0	0					
April	3	52	173	200					
May	5	99	250	290					
June	8	170	6877	8000					
July	3	59	190	220					
Aug	7	154	249	290					
Sept	0	0	0	0					
Oct	10	217	7725	9000					
Nov	0	0	0	0					
Dec	6	122	431	500					
Total(yr)	50	1,065	15,977	18,597					
Total(OS)	26	534	7,739	9,000					

Gas usage based on Meter Readings

Boilers (Registration #5-0809)

**NOx Emissions** 

NOx (tpy): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

4,100,798 cf NG/yr \* 0.000050 lb NOx/cf / 2000 lb/ton = 0.10 tons per year

NOx (ppd): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor)

2808.7654 cf NG/day \* 0.000050 lb NOx/cf = 0.14 pounds per day

NOx (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (NOx Emission Factor)

1,849 cf NG/OS / OS days \* 0.000050 lb NOx/cf = 0.09 pounds per day

**VOC Emissions** 

VOC (tpy): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

4,100,798 cf NG/yr \* 0.0000055 lb VOC/cf / 2000 lb/ton = 0.01 tons per year

VOC (ppd): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor)

2,809 cf NG/day \* 0.0000055 lb VOC/cf = 0.02 pounds per day

VOC (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (VOC Emission Factor)

1,849 cf NG/OS / OS days \* 0.0000055 lb VOC/cf = 0.01 pounds per day

**CO Emissions** 

CO (tpy): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

4,100,798 cf NG/yr \* 0.000084 lb CO/cf / 2000 lb/ton = 0.17 tons per year

CO (ppd): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor)

2,809 cf NG/day \* 0.000084 lb CO/cf = 0.24 pounds per day

**SOx Emissions** 

SOx (tpy): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

4,100,798 cf NG/yr \* 0.0000006 lb SOx/cf / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor)

2,809 cf NG/day \* 0.0000006 lb SOx/cf = 0.00 pounds per day

PM10 Emissions

PM10 (tpy): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor) / (2,000 pounds per ton)

4,100,798 cf NG/yr \* 0.0000019 lb PM10/cf/2000 lb/ton = 0.00 tons per year

PM10 (ppd): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor)

2,809 cf NG/day \* 0.0000019 lb PM10/cf = 0.01 pounds per day

PM (Condensable) Emissions

PM(C) (tpy): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor) / (2,000 pounds per ton)

4,100,798 cf NG/yr \* 0.0000057 lb PM(C)/cf/2000 lb/ton = 0.01 tons per year

PM(C) (ppd): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor)

2,809 cf NG/day \* 0.0000057 lb PM(C)/cf = 0.02 pounds per day

Boilers (Registration #5-0809)

**CO2 Emissions** 

CO2 (tpy): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

4,100,798 cf NG/yr \* 0.12 lb CO2/cf / 2000 lb/ton = 246.05 tons per year

CO2 (ppd): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor)

2,809 cf NG/day \* 0.12 lb CO2/cf = 337.05 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

4,100,798 cf NG/yr \* 0.0000023 lb CH4/cf / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor)

2,809 cf NG/day \* 0.0000023 lb CH4/cf = 0.01 pounds per day

**N2O Emissions** 

N2O (tpy): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor) / (2,000 pounds per ton)

4,100,798 cf NG/yr \* 0.0000022 lb N2O/cf / 2000 lb/ton = 0.00 tons per year

N2O (ppd): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor)

2,809 cf NG/day \* 0.0000022 lb N2O/cf = 0.01 pounds per day

# **Emission Data - Building 9220 Boilers**

Boiler:	#1		#2		#3		#4	
Reg.#:	5-0809	9	5-0809	5-0809		5-0809		9
MONTH	Gas	Gas	Gas	Gas	Gas	Gas	Gas	Gas
2022	(cu. ft)	(hours)						
Jan	122663	744	122663	744	122663	744	122663	744
Feb	91104	672	91104	672	91104	672	91104	672
March	84294	744	84294	744	84294	744	84294	744
April	69641	720	69641	720	69641	720	69641	720
May	56049	744	56049	744	56049	744	56049	744
June	43618	720	43618	720	43618	720	43618	720
July	46903	744	46903	744	46903	744	46903	744
Aug	62357	744	62357	744	62357	744	62357	744
Sept	59745	720	59745	720	59745	720	59745	720
Oct	108883	744	108883	744	108883	744	108883	744
Nov	124607	720	124607	720	124607	720	124607	720
Dec	155334	744	155334	744	155334	744	155334	744
Total(yr)	1,025,199	8760	1,025,199	8760	1,025,199	8760	1,025,199	8760
Total(OS)	338,314	4392	338,314	4392	338,314	4392	338,314	4392

Gas usage based on single building meter reading. Project to install individual meters initated.

AP42 emission factors

Boiler (Registration #5-0810)

**NOx Emissions** 

NOx (tpy): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor)

7,746,750 cf NG/yr \* 0.000050 lb NOx/hr / 2000 lb/ton = 0.19 tons per year

NOx (ppd): (Cubic Feet of Natural Gas consumed) \* (NOx Emission Factor)

5,306 cf NG/day \* 0.000050 lb NOx/hr = 0.27 pounds per day

NOx (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (NOx Emission Factor)

3939.9684 cf NG/OS / OS days \* 0.000050 lb NOx/cf = 0.20 pounds per day

**VOC Emissions** 

VOC (tpy): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

7,746,750 cf NG/yr \* 0.0000055 lb VOC/cf / 2000 lb/ton = 0.02 tons per year

VOC (ppd): (Cubic Feet of Natural Gas consumed) \* (VOC Emission Factor)

5,306 cf NG/day \* 0.0000055 lb VOC/cf = 0.03 pounds per day

VOC (TOSD): (Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) \* (VOC Emission Factor)

3,940 cf NG/OS / OS days \* 0.0000055 lb VOC/cf = 0.02 pounds per day

**CO Emissions** 

CO (tpy): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

7,746,750 cf NG/yr \* 0.000084 lb CO/cf / 2000 lb/ton = 0.33 tons per year

CO (ppd): (Cubic Feet of Natural Gas consumed) \* (CO Emission Factor)

5,306 cf NG/day \* 0.000084 lb CO/cf = 0.45 pounds per day

**SOx Emissions** 

SOx (tpy): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

7,746,750 cf NG/yr \* 0.0000006 lb SOx/cf / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Cubic Feet of Natural Gas consumed) \* (SOx Emission Factor)

5,306 cf NG/day \* 0.0000006 lb SOx/cf = 0.00 pounds per day

**PM10 Emissions** 

PM10 (tpy): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor) / (2,000 pounds per ton)

7,746,750 cf NG/yr \* 0.0000019 lb PM10/cf/2000 lb/ton = 0.01 tons per year

PM10 (ppd): (Cubic Feet of Natural Gas consumed) \* (PM10 Emission Factor)

5,306 cf NG/day \* 0.0000019 lb PM10/cf = 0.01 pounds per day

PM (Condensable) Emissions

PM(C) (tpy): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor) / (2,000 pounds per ton)

7,746,750 cf NG/yr \* 0.0000057 lb PM(C)/cf/2000 lb/ton = 0.02 tons per year

PM(C) (ppd): (Cubic Feet of Natural Gas consumed) \* (PM(C) Emission Factor)

5,306 cf NG/day \* 0.0000057 lb PM(C)/cf = 0.03 pounds per day

Boiler (Registration #5-0810)

**CO2 Emissions** 

CO2 (tpy): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

7,746,750 cf NG/yr \* 0.12 lb CO2/cf / 2000 lb/ton = 464.81 tons per year

CO2 (ppd): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor)

5,306 cf NG/day \* 0.12 lb CO2/cf = 636.72 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

7,746,750 cf NG/yr \* 0.0000023 lb CH4/cf / 2000 lb/ton = 0.01 tons per year

CH4 (ppd): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor)

5,306 cf NG/day \* 0.0000023 lb CH4/cf = 0.01 pounds per day

**N2O Emissions** 

N2O (tpy): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor) / (2,000 pounds per ton)

7,746,750 cf NG/yr \* 0.0000022 lb N2O/cf / 2000 lb/ton = 0.01 tons per year

N2O (ppd): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor)

5,306 cf NG/day \* 0.0000022 lb N2O/cf = 0.01 pounds per day

# **Emission Data - Building 9230 Boilers**

Boiler:		#1			#2			#3			#4	
Reg.#:		5-0810			5-0810			5-0810			5-0810	
MONTH	On Call	On Call	Total Gas	On Call	On Call	Total Gas	On Call	On Call	Total Gas	On Call	On Call	Total Gas
2022	(days)	(hr)	(cu. ft)									
Jan	31	744	268262	31	744	268262	31	744	268262	31	744	268262
Feb	28	672	190076	28	672	190076	28	672	190076	28	672	190076
March	31	744	174486	31	744	174486	31	744	174486	31	744	174486
April	30	720	156324	30	720	156324	30	720	156324	30	720	156324
May	31	744	128040	31	744	128040	31	744	128040	31	744	128040
June	30	720	101036	30	720	101036	30	720	101036	30	720	101036
July	31	744	109824	31	744	109824	31	744	109824	31	744	109824
Aug	31	744	113625	31	744	113625	31	744	113625	31	744	113625
Sept	30	720	112164	30	720	112164	30	720	112164	30	720	112164
Oct	31	744	153246	31	744	153246	31	744	153246	31	744	153246
Nov	30	720	183229	30	720	183229	30	720	183229	30	720	183229
Dec	31	744	246375	31	744	246375	31	744	246375	31	744	246375
Total(yr)	365	8,760	1,936,688	365	8,760	1,936,688	365	8,760	1,936,688	365	8,760	1,936,688
Total(OS)	183	4,392	721,014	183	4,392	721,014	183	4,392	721,014	183	4,392	721,014

Gas usage based on single building meter reading. Project to install individual meters initated.

AP42 emission factors

# Emission Calculations - Building 9259 (Registration #5-0811)

NOx Emission	ıs			
NOx (tpy):	(Cubic Feet of Natural Gas consumed) 860,123 cf NG/yr *	* (NOx Emission Factor) / (2,000 pounds per to 0.00005 lb NOx/cf / 2000 lb/ton =		tons per year
NOx (ppd):	(Cubic Feet of Natural Gas consumed) 1,178 cf NG/day *	* (NOx Emission Factor) 0.000050 lb NOx/cf =	0.06	pounds per day
NOx (TOSD):	(Cubic Feet of Natural Gas consumed 425 cf NG/OS / OS days *	in OSD) / (# of OSD) * (NOx Emission Factor) 0.000050 lb NOx/cf =	0.02	pounds per day
VOC Emissio		* (\/OC Fii Ft) / (2 000dt		
VOC (tpy):	860,123 cf NG/yr *	* (VOC Emission Factor) / (2,000 pounds per to 0.0000055 lb VOC/cf / 2000 lb/ton =		tons per year
VOC (ppd):	(Cubic Feet of Natural Gas consumed) 1,178 cf NG/day *	0.0000055 lb VOC/cf =	0.01	pounds per day
VOC (TOSD):		in OSD) / (# of OSD) * (VOC Emission Factor)	0.0.	pourius por uuy
	425 cf NG/OS / OS days *	0.0000055 lb VOC/cf =	0.00	pounds per day
CO Emission	3			
CO (tpy):		* (CO Emission Factor) / (2,000 pounds per ton	ı)	
00 ( 1)	860,123 cf NG/yr *	0.000084 lb CO/cf / 2000 lb/ton =	0.04	tons per year
CO (ppd):	(Cubic Feet of Natural Gas consumed) 1,178 cf NG/day *	(CO Emission Factor) 0.000084 lb CO/cf =	0.10	pounds per day
	1,176 CING/day	0.000084 lb CO/Cl =	0.10	pourius per day
SOx Emission	ıs			
SOx (tpy):		* (SOx Emission Factor) / (2,000 pounds per to		
	860,123 cf NG/yr *	0.0000006 lb SOx/cf / 2000 lb/ton =	0.00	tons per year
SOx (ppd):	(Cubic Feet of Natural Gas consumed) 1,178 cf NG/day *	* (SOx Emission Factor) 0.0000006 lb SOx/cf =	0.00	pounds per day
	1,176 CING/day	0.0000000 lb 30x/ci =	0.00	pourius per day
PM10 Emission	ons			
PM10 (tpy):	(Cubic Feet of Natural Gas consumed)	* (PM10 Emission Factor) / (2,000 pounds per	ton)	
D1440 ( 1)	860,123 cf NG/yr *	0.0000019 lb PM10/cf/2000 lb/ton =	0.00	tons per year
PM10 (ppd):	(Cubic Feet of Natural Gas consumed) 1.178 cf NG/day *	* (PM10 Emission Factor) 0.0000019 lb PM10/cf =	0.00	pounds per day
	1,176 CING/day	0.0000019 ID FIVITO/CI =	0.00	pourius per day
PM (Condens	able) Emissions			
PM(C) (tpy):		* (PM(C) Emission Factor) / (2,000 pounds per	ton)	
	860,123 cf NG/yr *	0.0000057 lb PM(C)/cf/2000 lb/ton =	0.00	tons per year
PM(C) (ppd):	(Cubic Feet of Natural Gas consumed)		0.01	noundo nor dov
	1,178 cf NG/day *	0.0000057 lb PM(C)/cf =	0.01	pounds per day
CO2 Emission	ıs			
CO2 (tpy):	(Cubic Feet of Natural Gas consumed)	* (CO2 Emission Factor) / (2,000 pounds per to		
	860,123 cf NG/yr *		51.61	tons per year
CO2 (ppd):	(Cubic Feet of Natural Gas consumed) 1,178 cf NG/day *		11 20	noundo nor dov
	1,176 CING/day	0. 12 lb CO2/Cl = 12	11.39	pounds per day
CH4 Emission	ıs			
CH4 (tpy):	(Cubic Feet of Natural Gas consumed)	* (CH4 Emission Factor) / (2,000 pounds per to	n)	
	860,123 cf NG/yr *	0.0000023 lb CH4/cf / 2000 lb/ton =	0.00	tons per year
CH4 (ppd):	(Cubic Feet of Natural Gas consumed)		0.00	noundo nor
	1,178 cf NG/day *	0.0000023 lb CH4/cf =	0.00	pounds per day
N2O Emission	ns			
N2O (tpy):		* (N2O Emission Factor) / (2,000 pounds per to	n)	
	860,123 cf NG/yr *	0.0000022 lb N2O/cf / 2000 lb/ton =	0.00	tons per year
N2O (ppd):	(Cubic Feet of Natural Gas consumed)		0.00	
	1,178 cf NG/day *	0.0000022 lb N2O/cf =	0.00	pounds per day

# **Emission Data - Building 9259 Boilers**

Boiler:		#1			#2	
Reg.#:		5-0811			5-0811	ı
MONTH	On Call	On Call	Total Gas	On Call	On Call	Total Gas
2022	(days)	(hr)	(cu. ft)	(days)	(hr)	(cu. ft)
Jan	31	744	92704	31	744	92704
Feb	28	672	72060	28	672	72060
March	31	744	52178	31	744	52178
April	30	720	32179	30	720	32179
May	31	744	14201	31	744	14201
June	30	720	6833	30	720	6833
July	31	744	6611	31	744	6611
Aug	31	744	8228	31	744	8228
Sept	30	720	9690	30	720	9690
Oct	31	744	22309	31	744	22309
Nov	30	720	41704	30	720	41704
Dec	31	744	71366	31	744	71366
Total(yr)	365	8,760	430,061	365	8,760	430,061
Total(OS)	183	4,392	77,741	183	4,392	77,741

Gas usage based on single building meter reading. Project to install individual meters initated.

AP42 emission factors

# Emission Calculations - Building 9225 Boilers (Registration #5-0823)

Dollers (R	Registration #5-0625)		
NOx Emissio		//2 000 married marriam)	
NOx (tpy):	(Cubic Feet of Natural Gas consumed) * (NOx Emission Factor) 3,867,690 cf NG/yr * 0.00005 lb NOx/	/cf / 2000 lb/ton = 0.10	tons per year
NOx (ppd):	(Cubic Feet of Natural Gas consumed) * (NOx Emission Factor) 3,532 cf NG/day * 0.000050 lb NOx/		pounds per day
NOx (TOSD):	(Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) * (NO 2,242 cf NG/OS / OS days * 0.000050 lb NOx/		pounds per day
VOC Emissis	•	0.11	poditae por day
VOC Emissio		//0.000	
VOC (tpy):	(Cubic Feet of Natural Gas consumed) * (VOC Emission Factor) 3,867,690 cf NG/yr * 0.0000055 lb VOC/	/cf / 2000 lb/ton = 0.01	tons per year
VOC (ppd):	(Cubic Feet of Natural Gas consumed) * (VOC Emission Factor) 3,532 cf NG/day * 0.0000055 lb VOC/		pounds per day
VOC (TOSD):	(Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) * (VC	OC Emission Factor)	
	2,242 cf NG/OS / OS days * 0.0000055 lb VOC/	/CT = 0.01	pounds per day
<b>CO Emission</b>	S		
CO (tpy):	(Cubic Feet of Natural Gas consumed) * (CO Emission Factor) /	(2.000 pounds per ton)	
(13)	3,867,690 cf NG/yr * 0.000084 lb CO/c		tons per year
CO (ppd):	(Cubic Feet of Natural Gas consumed) * (CO Emission Factor)	.,	, , , , , , , , , , , , , , , , , , ,
(PP 1).	3,532 cf NG/day * 0.000084 lb CO/c	f = 0.30	pounds per day
SOx Emission			
SOx (tpy):	(Cubic Feet of Natural Gas consumed) * (SOx Emission Factor)		
	3,867,690 cf NG/yr * 0.0000006 lb SOx/	cf / 2000 lb/ton = 0.00	tons per year
SOx (ppd):	(Cubic Feet of Natural Gas consumed) * (SOx Emission Factor)		
	3,532 cf NG/day * 0.0000006 lb SOx/d	cf = 0.00	pounds per day
PM10 Emissi	ons		
PM10 (tpy):	(Cubic Feet of Natural Gas consumed) * (PM10 Emission Factor	·) / (2 000 pounds per top)	
i wito (tpy).	3,867,690 cf NG/yr * 0.0000019 lb PM10	, , , , , , , , , , , , , , , , , , , ,	tons per year
PM10 (ppd):	(Cubic Feet of Natural Gas consumed) * (PM10 Emission Factor		toris per year
r wro (ppa).	3,532 cf NG/day * 0.0000019 lb PM10	•	pounds per day
	3,332 CI NG/day 0.0000019 ID FINTO	7/Cl = 0.01	pourius per day
PM (Condens	sable) Emissions		
PM(C) (tpy):	(Cubic Feet of Natural Gas consumed) * (PM(C) Emission Factor	r) / (2,000 pounds per ton)	
	3,867,690 cf NG/yr * 0.0000057 lb PM(C		tons per year
PM(C) (ppd):	(Cubic Feet of Natural Gas consumed) * (PM(C) Emission Factor	r)	

0.0000057 lb PM(C)/cf =

0.02 pounds per day

3,532 cf NG/day \*

### **Emission Calculations - Building 9225**

Boilers (Registration #5-0823)

**CO2 Emissions** 

CO2 (tpy): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

3,867,690 cf NG/yr \* 0.12 lb CO2/cf / 2000 lb/ton = 232.06 tons per year

CO2 (ppd): (Cubic Feet of Natural Gas consumed) \* (CO2 Emission Factor)

3,532 cf NG/day \* 0.12 lb CO2/cf = 423.86 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

3,867,690 cf NG/yr \* 0.0000023 lb CH4/cf / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Cubic Feet of Natural Gas consumed) \* (CH4 Emission Factor)

3,532 cf NG/day \* 0.0000023 lb CH4/cf = 0.01 pounds per day

**N2O Emissions** 

N2O (tpy): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor) / (2,000 pounds per ton)

3,867,690 cf NG/yr \* 0.0000022 lb N2O/cf / 2000 lb/ton = 0.00 tons per year

N2O (ppd): (Cubic Feet of Natural Gas consumed) \* (N2O Emission Factor)

3,532 cf NG/day \* 0.0000022 lb N2O/cf = 0.01 pounds per day

# **Emission Data - Building 9225 Boilers**

Boiler:	#1		#2		#3	
Reg.#:	5-0823		5-0823		5-0823	
MONTH	Gas		Gas		Gas	
2022	(cu. ft)	(hours)	(cu. ft)	(hours)	(cu. ft)	(hours)
Jan	209900	744	209900	744	209900	744
Feb	141938	672	141938	672	141938	672
March	118220	744	118220	744	118220	744
April	84843	720	84843	720	84843	720
May	66645	744	66645	744	66645	744
June	58920	720	58920	720	58920	720
July	70218	744	70218	744	70218	744
Aug	67260	744	67260	744	67260	744
Sept	62435	720	62435	720	62435	720
Oct	83105	744	83105	744	83105	744
Nov	125785	720	125785	720	125785	720
Dec	199963	744	199963	744	199963	744
Total(yr)	1,289,230	8760	1,289,230	8760	1,289,230	8760
Total(OS)	410,320	4392	410,320	4392	410,320	4392

Gas usage based on single building meter reading. Project to install individual meters initated.

AP42 emission factors

# Boilers in commissioning status for 2022

NOx Emission	ne.		
NOx (tpy):	(Cubic Feet of Natural Gas consumed) * (NOx Emission Factor) / (2,000 pounds per ton)		
(13)	0 cf NG/yr * 0.000050 lb NOx/cf / 2000 lb/ton =	0.00	tons per year
NOx (ppd):	(Cubic Feet of Natural Gas consumed) * (NOx Emission Factor) - cf NG/day * 0.000050 lb NOx/cf =	0.00	pounds per day
NOx (TOSD):	(Cubic Feet of Natural Gas consumed in OSD) / (# of OSD) * (NOx Emission Factor)	0.00	pourius per day
,	2,150 cf NG/OS / OS days * 0.000050 lb NOx/cf =	0.11	pounds per day
VOC Emission	ne		
VOC (tpy):	(Cubic Feet of Natural Gas consumed) * (VOC Emission Factor) / (2,000 pounds per ton)		
- (17)	0 cf NG/yr * 0.0000055 lb VOC/cf / 2000 lb/ton =	0.00	tons per year
VOC (ppd):	(Cubic Feet of Natural Gas consumed) * (VOC Emission Factor) 0 cf NG/day * 0.0000055 lb VOC/cf =	0.00	noundo nos dou
VOC (TOSD):	•	0.00	pounds per day
, ,	2,150 cf NG/OS / OS days * 0.0000055 lb VOC/cf =	0.01	pounds per day
CO Emissions			
CO (tpy):	(Cubic Feet of Natural Gas consumed) * (CO Emission Factor) / (2,000 pounds per ton)		
,	0 cf NG/yr * 0.000084 lb CO/cf / 2000 lb/ton =	0.00	tons per year
CO (ppd):	(Cubic Feet of Natural Gas consumed) * (CO Emission Factor)  0 cf NG/day *  0.000084 lb CO/cf =	0.00	noundo nos dou
	0.000004 lb CO/Cl =	0.00	pounds per day
SOx Emission			
SOx (tpy):	(Cubic Feet of Natural Gas consumed) * (SOx Emission Factor) / (2,000 pounds per ton)  0 cf NG/yr *  0.0000006 lb SOx/cf / 2000 lb/ton =	0.00	tons per year
SOx (ppd):	(Cubic Feet of Natural Gas consumed) * (SOx Emission Factor)	0.00	toris per year
(11)	0 cf NG/day * 0.0000006 lb SOx/cf =	0.00	pounds per day
PM10 Emissio	one		
PM10 (tpy):	(Cubic Feet of Natural Gas consumed) * (PM10 Emission Factor) / (2,000 pounds per ton)		
- (13)	0 cf NG/yr * 0.0000019 lb PM10/cf/2000 lb/ton =	0.00	tons per year
PM10 (ppd):	(Cubic Feet of Natural Gas consumed) * (PM10 Emission Factor)  0 cf NG/day *  0.0000019 lb PM10/cf =	0.00	pounds per day
	0.0000019 lb FN110/c1 -	0.00	pourius per day
PM (Condens	able) Emissions		
PM(C) (tpy):	(Cubic Feet of Natural Gas consumed) * (PM(C) Emission Factor) / (2,000 pounds per ton)	0.00	tono norvoor
PM(C) (ppd):	0 cf NG/yr * 0.0000057 lb PM(C)/cf/2000 lb/ton = (Cubic Feet of Natural Gas consumed) * (PM(C) Emission Factor)	0.00	tons per year
(-) ((1))	0 cf NG/day * 0.0000057 lb PM(C)/cf =	0.00	pounds per day
CO2 Emission			
CO2 (tpy):	(Cubic Feet of Natural Gas consumed) * (CO2 Emission Factor) / (2,000 pounds per ton)		
- (	0 cf NG/yr * 0.12 lb CO2/cf / 2000 lb/ton =	0.00	tons per year
CO2 (ppd):	(Cubic Feet of Natural Gas consumed) * (CO2 Emission Factor)	0.00	
	0 cf NG/day * 0.12 lb CO2/cf =	0.00	pounds per day
CH4 Emission	ns		
CH4 (tpy):	(Cubic Feet of Natural Gas consumed) * (CH4 Emission Factor) / (2,000 pounds per ton)		
CH4 (ppd):	0 cf NG/yr * 0.0000023 lb CH4/cf / 2000 lb/ton = (Cubic Feet of Natural Gas consumed) * (CH4 Emission Factor)	0.00	tons per year
C111 (PPG).	0 cf NG/day * 0.0000023 lb CH4/cf =	0.00	pounds per day
NOO E	_		
N2O Emission N2O (tpy):	ns  (Cubic Feet of Natural Gas consumed) * (N2O Emission Factor) / (2,000 pounds per ton)		
1420 (tpy).	0 cf NG/yr * 0.0000022 lb N2O/cf / 2000 lb/ton =	0.00	tons per year
N2O (ppd):	(Cubic Feet of Natural Gas consumed) * (N2O Emission Factor)		
	0 cf NG/day * 0.0000022 lb N2O/cf =	0.00	pounds per day

Boiler:	#1		#2		#3		#4	
Reg.#:	5-0	842	5-0842		5-0842		5-0842	
MONTH	Gas	Gas	Gas	Gas	Gas	Gas	Gas	Gas
2020	(cu. ft)	(hours)						
Jan		744		744		744		744
Feb		672		672		672		672
March		744		744		744		744
April		720		720		720		720
May		744		744		744		744
June		720		720		720		720
July		744		744		744		744
Aug		744		744		744		744
Sept		720		720		720		720
Oct		744		744		744		744
Nov		720		720		720		720
Dec		744		744		744		744
Total(yr)	0	8760	0	8760	0	8760	0	8760
Total(OS)	0	4392	0	4392	0	4392	0	4392

Source in commissing status for 2022

Engine #1 (Registration #9-0818)

**NOx Emissions** 

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 39.375 lb NOx/hr / 2000 lb/ton = 0.08 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

2.0 hr/day \* 39.375 lb NOx/hr = 80.72 pounds per day

NOx (TOSD): (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

2.10 hr/OSday \* 39.375 lb NOx/hr = 82.69 pounds per day

**VOC Emissions** 

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 0.875 lb VOC/hr / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Hours of Engine Operation) \* (VOC Emission Factor)

2.0 hr/day \* 0.875 lb VOC/hr = 1.79 pounds per day

VOC (TOSD): (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

2.10 hr/OSday \* 0.875 lb VOC/hr = 1.84 pounds per day

**CO Emissions** 

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 2 lb CO/hr / 2000 lb/ton = 0.00 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

2.0 hr/day \* 2 lb CO/hr = 4.10 pounds per day

**SOx Emissions** 

SOx (tpy): (Hours of Engine Operation) \* (SOx Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 0.6875 lb SOx/hr / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Hours of Engine Opeation) \* (SOx Emission Factor)

2.0 hr/day \* 0.6875 lb SOx/hr = 1.41 pounds per day

PM(Total) Emissions

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 0.25 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

2.0 hr/day \* 0.25 lb PM/hr = 0.51 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Gallons of Diesel Consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

645 gal/yr \* 22.605 lb CO2/gal / 2000 lb/ton = 7.30 tons per year

CO2 (ppd): (Gallons of Diesel Consumed) \* (CO2 Emission Factor)

322.7 gal/day \* 22.605 lb CO2/gal = 7295.53 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Gallons of Diesel Consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

645 gal/yr \* 0.01233 lb CH4/gal / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Gallons of Diesel Consumed) \* (CH4 Emission Factor)

322.7 gal/day \* 0.01233 lb CH4/gal = 3.98 pounds per day

Engine #2 (Registration #9-0819)

**NOx Emissions** 

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 39.375 lb NOx/hr / 2000 lb/ton = 0.08 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

2.0 hr/day \* 39.375 lb NOx/hr = 80.72 pounds per day

NOx (TOSD): (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

2.10 hr/OSday \* 39.375 lb NOx/hr = 82.69 pounds per day

**VOC Emissions** 

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 0.875 lb VOC/hr / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Hours of Engine Operation) \* (VOC Emission Factor)

2.0 hr/day \* 0.875 lb VOC/hr = 1.79 pounds per day

VOC (TOSD): (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

2.10 hr/OSday \* 0.875 lb VOC/hr = 1.84 pounds per day

**CO Emissions** 

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 2 lb CO/hr / 2000 lb/ton = 0.00 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

2.0 hr/day \* 2 lb CO/hr = 4.10 pounds per day

**SOx Emissions** 

SOx (tpy): (Hours of Engine Operation) \* (SOx Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 0.6875 lb SOx/hr / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Hours of Engine Opeation) \* (SOx Emission Factor)

2.0 hr/day \* 0.6875 lb SOx/hr = 1.41 pounds per day

PM(Total) Emissions

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 0.25 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

2.0 hr/dav \* 0.25 lb PM/hr = 0.51 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Gallons of Diesel Consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

619 gal/yr \* 22.605 lb CO2/gal / 2000 lb/ton = 7.00 tons per year

CO2 (ppd): (Gallons of Diesel Consumed) \* (CO2 Emission Factor)

309.6 gal/day \* 22.605 lb CO2/gal = 6998.50 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Gallons of Diesel Consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

619 gal/yr \* 0.01233 lb CH4/gal / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Gallons of Diesel Consumed) \* (CH4 Emission Factor)

309.6 gal/day \* 0.01233 lb CH4/gal = 3.82 pounds per day

Engine #3 (Registration #9-0820)

**NOx Emissions** 

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 39.375 lb NOx/hr / 2000 lb/ton = 0.08 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

2.0 hr/day \* 39.375 lb NOx/hr = 80.72 pounds per day

NOx (TOSD): (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

2.10 hr/OSday \* 39.375 lb NOx/hr = 82.69 pounds per day

**VOC Emissions** 

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 0.875 lb VOC/hr / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Hours of Engine Operation) \* (VOC Emission Factor)

2.0 hr/day \* 0.875 lb VOC/hr = 1.79 pounds per day

VOC (TOSD): (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

2.10 hr/OSday \* 0.875 lb VOC/hr = 1.84 pounds per day

**CO Emissions** 

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 2 lb CO/hr / 2000 lb/ton = 0.00 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

2.0 hr/day \* 2 lb CO/hr = 4.10 pounds per day

**SOx Emissions** 

SOx (tpy): (Hours of Engine Operation) \* (SOx Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 0.6875 lb SOx/hr / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Hours of Engine Opeation) \* (SOx Emission Factor)

2.0 hr/day \* 0.6875 lb SOx/hr = 1.41 pounds per day

PM(Total) Emissions

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 0.25 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

2.0 hr/day \* 0.25 lb PM/hr = 0.51 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Gallons of Diesel Consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

616 gal/yr \* 22.605 lb CO2/gal / 2000 lb/ton = 6.96 tons per year

CO2 (ppd): (Gallons of Diesel Consumed) \* (CO2 Emission Factor)

307.9 gal/day \* 22.605 lb CO2/gal = 6959.85 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Gallons of Diesel Consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

616 gal/yr \* 0.01233 lb CH4/gal / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Gallons of Diesel Consumed) \* (CH4 Emission Factor)

307.9 gal/day \* 0.01233 lb CH4/gal = 3.80 pounds per day

Engine #4 (Registration #9-0821)

**NOx Emissions** 

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 39.375 lb NOx/hr / 2000 lb/ton = 0.08 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

2.0 hr/day \* 39.375 lb NOx/hr = 80.72 pounds per day

NOx (TOSD): (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

2.10 hr/OSday \* 39.375 lb NOx/hr = 82.69 pounds per day

**VOC Emissions** 

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 0.875 lb VOC/hr / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Hours of Engine Operation) \* (VOC Emission Factor)

2.0 hr/day \* 0.875 lb VOC/hr = 1.79 pounds per day

VOC (TOSD): (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

2.10 hr/OSday \* 0.875 lb VOC/hr = 1.84 pounds per day

**CO Emissions** 

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 2 lb CO/hr / 2000 lb/ton = 0.00 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

2.0 hr/day \* 2 lb CO/hr = 4.10 pounds per day

**SOx Emissions** 

SOx (tpy): (Hours of Engine Operation) \* (SOx Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 0.6875 lb SOx/hr / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Hours of Engine Opeation) \* (SOx Emission Factor)

2.0 hr/day \* 0.6875 lb SOx/hr = 1.41 pounds per day

PM(Total) Emissions

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

4 hr/yr \* 0.25 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

2.0 hr/day \* 0.25 lb PM/hr = 0.51 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Gallons of Diesel Consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

620 gal/yr \* 22.605 lb CO2/gal / 2000 lb/ton = 7.01 tons per year

CO2 (ppd): (Gallons of Diesel Consumed) \* (CO2 Emission Factor)

310.2 gal/day \* 22.605 lb CO2/gal = 7011.16 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Gallons of Diesel Consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

620 gal/yr \* 0.01233 lb CH4/gal / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Gallons of Diesel Consumed) \* (CH4 Emission Factor)

310.2 gal/day \* 0.01233 lb CH4/gal = 3.82 pounds per day

Engine #5 (Registration #9-0822)

**NOx Emissions** 

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

5 hr/yr \* 39.375 lb NOx/hr / 2000 lb/ton = 0.10 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

2.6 hr/day \* 39.375 lb NOx/hr = 102.37 pounds per day

NOx (TOSD): (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

3.20 hr/OSday \* 39.375 lb NOx/hr = 126.00 pounds per day

**VOC Emissions** 

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

5 hr/yr \* 0.875 lb VOC/hr / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Hours of Engine Operation) \* (VOC Emission Factor)

2.6 hr/day \* 0.875 lb VOC/hr = 2.27 pounds per day

VOC (TOSD): (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

3.20 hr/OSday \* 0.875 lb VOC/hr = 2.80 pounds per day

**CO Emissions** 

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

5 hr/yr \* 2 lb CO/hr / 2000 lb/ton = 0.01 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

2.6 hr/day \* 2 lb CO/hr = 5.20 pounds per day

**SOx Emissions** 

SOx (tpy): (Hours of Engine Operation) \* (SOx Emission Factor) / (2,000 pounds per ton)

5 hr/yr \* 0.6875 lb SOx/hr / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Hours of Engine Opeation) \* (SOx Emission Factor)

2.6 hr/day \* 0.6875 lb SOx/hr = 1.79 pounds per day

PM(Total) Emissions

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

5 hr/yr \* 0.25 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

2.6 hr/day \* 0.25 lb PM/hr = 0.65 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Gallons of Diesel Consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

667 gal/yr \* 22.605 lb CO2/gal / 2000 lb/ton = 7.54 tons per year

CO2 (ppd): (Gallons of Diesel Consumed) \* (CO2 Emission Factor)

333.4 gal/day \* 22.605 lb CO2/gal = 7536.50 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Gallons of Diesel Consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

667 gal/yr \* 0.01233 lb CH4/gal / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Gallons of Diesel Consumed) \* (CH4 Emission Factor)

333.4 gal/day \* 0.01233 lb CH4/gal = 4.11 pounds per day

Engine #6 (Registration #9-0823)

**NOx Emissions** 

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

2 hr/yr \* 39.375 lb NOx/hr / 2000 lb/ton = 0.04 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

2.0 hr/day \* 39.375 lb NOx/hr = 78.75 pounds per day

NOx (TOSD): (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

0.00 hr/OSday \* 39.375 lb NOx/hr = 0.00 pounds per day

**VOC Emissions** 

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

2 hr/yr \* 0.875 lb VOC/hr / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Hours of Engine Operation) \* (VOC Emission Factor)

2.0 hr/day \* 0.875 lb VOC/hr = 1.75 pounds per day

VOC (TOSD): (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

0.00 hr/OSday \* 0.875 lb VOC/hr = 0.00 pounds per day

**CO Emissions** 

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

2 hr/yr \* 2 lb CO/hr / 2000 lb/ton = 0.00 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

2.0 hr/day \* 2 lb CO/hr = 4.00 pounds per day

**SOx Emissions** 

SOx (tpy): (Hours of Engine Operation) \* (SOx Emission Factor) / (2,000 pounds per ton)

2 hr/yr \* 0.6875 lb SOx/hr / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Hours of Engine Opeation) \* (SOx Emission Factor)

2.0 hr/day \* 0.6875 lb SOx/hr = 1.37 pounds per day

PM(Total) Emissions

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

2 hr/yr \* 0.25 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

2.0 hr/day \* 0.25 lb PM/hr = 0.50 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Gallons of Diesel Consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

305 gal/yr \* 22.605 lb CO2/gal / 2000 lb/ton = 3.45 tons per year

CO2 (ppd): (Gallons of Diesel Consumed) \* (CO2 Emission Factor)

305.1 gal/day \* 22.605 lb CO2/gal = 6897.68 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Gallons of Diesel Consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

305 gal/yr \* 0.01233 lb CH4/gal / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Gallons of Diesel Consumed) \* (CH4 Emission Factor)

305.1 gal/day \* 0.01233 lb CH4/gal = 3.76 pounds per day

Engine:	#1 BI	HP·	2835	#2		2835	#3		2835	
Reg.#:	9-0818 K		2375	9-0819		2375	9-0820		2375	
MONTH	Diesel Fuel	Time		Diesel Fuel	Time	Runs	Diesel Fuel	Time	Runs	
2022	(gallons)	(hours)	(days)	(gallons)	(hours)	(days)	(gallons)	(hours)	(days)	
Jan	316.9	2.0	1	309.2	2.0	1	303.2	2.0	1	Note: Emissions based upon
Feb	-	_	- 2 1	-	_	- 2	-	_	`	manufacturer's testing data.
March	_		- 2	_		_		_	_	39.375 lb NOx/hr same for N2O
April	_	2.0		_		_	_		_	0.875 lb VOC/hr
May	_	2.0		_	2.0		_		_	0.6875 lb SOx/hr
June	_	2.0		_	2	-		_	_	2 lb CO/hr
July	328.6	2.1	1	310.0	2.1	1	312.6	2.1	1	0.25 lb PM/hr
Aug	_		-	-		-	-	_	_	22.605 lb CO2/gal
Sept	_		-	-		-	-	_	_	0.01233 lb CH4/gal
Oct	-	-	-	-	-	-	-	-	-	, and the second
Nov	-		-	-	-	-	-	-	-	
Dec	-	-	-	-	-	-	-	-	-	
Total(yr)	645	4	2	619	4	2	616	4	2	
Total(OS)	329	2	1	310	2	1	313	2	1	
	Emergen	cy Hours	0	Emerger	ncy Hours	0	Emerger	ncy Hours	0	
	Maint./Testi	ng Hours	4	Maint./Test	ing Hours	4	Maint./Testi	ing Hours	4	
Engine:	#4 BI		2835	#5		2835	#6		2835	
Reg.#:	9-0821 K	W (Out):	2375	9-0822		2375	9-0823		2375	
Reg.#: MONTH	9-0821 K	W (Out): Time	2375 Runs	9-0822 Diesel Fuel	Time	2375 Runs	9-0823 Diesel Fuel	Time	2375 Runs	
Reg.#: MONTH 2022	9-0821 K <sup>1</sup> Diesel Fuel (gallons)	W (Out): Time (hours)	2375 Runs (days)	9-0822 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	9-0823 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	
Reg.#: MONTH 2022 Jan	9-0821 K	W (Out): Time	2375 Runs	9-0822 Diesel Fuel		2375 Runs	9-0823 Diesel Fuel		2375 Runs	
Reg.#: MONTH 2022 Jan Feb	9-0821 K <sup>1</sup> Diesel Fuel (gallons)	W (Out): Time (hours)	2375 Runs (days)	9-0822 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	9-0823 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	
Reg.#: MONTH 2022 Jan Feb March	9-0821 K <sup>1</sup> Diesel Fuel (gallons)	W (Out): Time (hours)	2375 Runs (days)	9-0822 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	9-0823 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	
Reg.#: MONTH 2022 Jan Feb March April	9-0821 K <sup>1</sup> Diesel Fuel (gallons)	W (Out): Time (hours)	2375 Runs (days)	9-0822 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	9-0823 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	
Reg.#: MONTH 2022 Jan Feb March April May	9-0821 K <sup>1</sup> Diesel Fuel (gallons)	W (Out): Time (hours)	2375 Runs (days) 1	9-0822 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	9-0823 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	
Reg.#: MONTH 2022 Jan Feb March April May June	9-0821 KV Diesel Fuel (gallons) 303.8	W (Out): Time (hours) 2.0	2375 Runs (days) 1	9-0822 Diesel Fuel (gallons) 304.6	(hours) 2.0	2375 Runs (days) 1 - - - -	9-0823 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	
Reg.#: MONTH 2022 Jan Feb March April May June July	9-0821 K <sup>1</sup> Diesel Fuel (gallons)	W (Out): Time (hours)	2375 Runs (days) 1	9-0822 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	9-0823 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	
Reg.#:  MONTH 2022  Jan Feb March April May June July Aug	9-0821 KV Diesel Fuel (gallons) 303.8	W (Out): Time (hours) 2.0	2375 Runs (days) 1	9-0822 Diesel Fuel (gallons) 304.6	(hours) 2.0	2375 Runs (days) 1 - - - -	9-0823 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	
Reg.#: MONTH 2022 Jan Feb March April May June July Aug Sept	9-0821 KV Diesel Fuel (gallons) 303.8	W (Out): Time (hours) 2.0	2375 Runs (days) 1	9-0822 Diesel Fuel (gallons) 304.6	(hours) 2.0	2375 Runs (days) 1 - - - -	9-0823 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	
Reg.#: MONTH 2022 Jan Feb March April May June July Aug Sept Oct	9-0821 KV Diesel Fuel (gallons) 303.8	W (Out): Time (hours) 2.0	2375 Runs (days) 1	9-0822 Diesel Fuel (gallons) 304.6	(hours) 2.0	2375 Runs (days) 1 - - - -	9-0823 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	
Reg.#: MONTH 2022 Jan Feb March April May June July Aug Sept Oct Nov	9-0821 KV Diesel Fuel (gallons) 303.8	W (Out): Time (hours) 2.0	2375 Runs (days) 1	9-0822 Diesel Fuel (gallons) 304.6	(hours) 2.0	2375 Runs (days) 1 - - - -	9-0823 Diesel Fuel (gallons)	(hours)	2375 Runs (days)	
Reg.#: MONTH 2022 Jan Feb March April May June July Aug Sept Oct Nov Dec	9-0821 KV Diesel Fuel (gallons) 303.8 316.5	W (Out):  Time (hours)  2.0  2.1	2375 Runs (days)  1 1	9-0822 Diesel Fuel (gallons) 304.6	(hours) 2.0 3.2	2375 Runs (days)  1 1 1	9-0823 Diesel Fuel (gallons) 305.1	(hours) 2.0	2375 Runs (days) 1	
Reg.#: MONTH 2022 Jan Feb March April May June July Aug Sept Oct Nov Dec Total(yr)	9-0821 KV Diesel Fuel (gallons)  303.8  316.5	W (Out):  Time (hours)  2.0  2.1  2.1  - 4	2375 Runs (days)  1 1 2	9-0822 Diesel Fuel (gallons) 304.6	(hours) 2.0 3.2 5	2375 Runs (days)  1 1 1	9-0823 Diesel Fuel (gallons) 305.1	(hours) 2.0 2	2375 Runs (days) 1 1	
Reg.#: MONTH 2022 Jan Feb March April May June July Aug Sept Oct Nov Dec	9-0821 KV Diesel Fuel (gallons)  303.8  316.5 317	W (Out):  Time (hours)  2.0  2.1  4 2	2375 Runs (days)  1 1 1 1 - 1 - 1 - 1	9-0822  Diesel Fuel (gallons)  304.6  362.2	(hours) 2.0 3.2 3.2 3.2 3.3	2375 Runs (days)  1 1 1 1 - 1 - 1 - 1 -	9-0823 Diesel Fuel (gallons) 305.1	(hours) 2.0	2375 Runs (days) 1 1 0	
Reg.#: MONTH 2022 Jan Feb March April May June July Aug Sept Oct Nov Dec Total(yr)	9-0821 KV Diesel Fuel (gallons)  303.8  316.5	W (Out):  Time (hours)  2.0  2.1  2.1  2.cy Hours	2375 Runs (days)  1 1 2	9-0822  Diesel Fuel (gallons)  304.6  362.2	(hours) 2.0 3.2 3.2 3.0	2375 Runs (days)  1 1 1	9-0823 Diesel Fuel (gallons) 305.1	(hours) 2.0	2375 Runs (days) 1 1	

### **Emission Calculations Building 9840 Emergency Generator**

Engine #1 (Registration #9-0918)

<b>NOx</b>	<b>Emis</b>	sions
------------	-------------	-------

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

16 hr/yr \* 12.69 lb NOx/hr / 2000 lb/ton = 0.10 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

1.8 hr/day \* 12.69 lb NOx/hr = 22.42 pounds per day

NOx (TOSD): (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

1.6 hr/OSday \* 12.69 lb NOx/hr = 20.82 pounds per day

#### **VOC Emissions**

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

16 hr/yr \* 1.33 lb VOC/hr / 2000 lb/ton = 0.01 tons per year

VOC (ppd): (Hours of Engine Operation) \* (VOC Emission Factor)

1.8 hr/day \* 1.33 lb VOC/hr = 2.35 pounds per day

VOC (TOSD): (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

1.6 hr/OSday \* 1.33 lb VOC/hr = 2.18 pounds per day

#### **CO Emissions**

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

16 hr/yr \* 6.95 lb CO/hr / 2000 lb/ton = 0.06 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

1.8 hr/day \* 6.95 lb CO/hr = 12.27 pounds per day

#### **PM(Total) Emissions**

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

16 hr/yr \* 0.40 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

1.8 hr/day \* 0.40 lb PM/hr = 0.71 pounds per day

#### **CO2 Emissions**

CO2 (tpy): (Gallons of Diesel Consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

1,037 gal/yr \* 22.605 lb CO2/gal / 2000 lb/ton = 11.72 tons per year

CO2 (ppd): (Gallons of Diesel Consumed) \* (CO2 Emission Factor)

115.2 gal/day \* 22.605 lb CO2/gal = 2603.79 pounds per day

#### **N2O Emissions**

N2O (tpy): (Hours of Engine Operation) \* (N2O Emission Factor) / (2,000 pounds per ton)

16 hr/yr \* 12.69 lb PM/hr / 2000 lb/ton = 0.10 tons per year

N2O (ppd): (Hours of Engine Operation) \* (N2O Emission Factor)

1.8 hr/day \* 12.69 lb PM/hr = 22.42 pounds per day

#### **CH4 Emissions**

CH4 (tpy): (Hours of Engine Operation) \* (CH4 Emission Factor) / (2,000 pounds per ton)

16 hr/yr \* 1.33 lb CO2/hr / 2000 lb/ton = 0.01 tons per year

CH4 (ppd): (Hours of Engine Operation) \* (CO2 Emission Factor)

1.8 hr/yr \* 1.33 lb CO2/hr = 2.35 pounds per day

Page 115 of 169

Note: Emission Factors are from Manufacturer Testing and AP-42.

# **Emission Data - Building 9840 Caterpillar Emergency Generator**

Engine: Reg. #: BHP: KW (Out):		#1 9-0918 1207 900	
MONTH 2022	Diesel Fuel	Time	Runs
	(gallons)	(hours)	(days)
Jan	59	1	1
Feb	72	1	1
March	117	2	1
April	137	2	1
May	78	1	1
June	0	0	0
July	85	1	1
Aug	91	1	1
Sept	143	2	1
Oct	0	0	0
Nov	254	4	1
Dec	0	0	0
Total(yr)	1037	16	9
Total(OS)	535	8	5

Emergency Hours 0
Maint./Testing Hours 16

Note: Emission factors used are EPA Tier 2 Emission Limits

12.69 lb NOx/hr same for N2O

1.33 lb VOC/hr same for CH4

6.95 lb CO/hr

0.40 lb PM/hr

SOx emissions negligible.

NOx Emiss	sions				
NOx (tpy):	(Hours		(NOx Emission Factor) / (2,000 poเ		
			69 lb NOx/hr / 2000 lb/ton =	0.21	tons per year
NOx (ppd):	(Hours	of Engine Operation) *			
			69 lb NOx/hr =	52.91	pounds per day
NOx (TOSI	(Hours		OSDay) * (NOx Emission Factor)		
		1.2 hr/OSday * 35.0	69 lb NOx/hr =	42.83	pounds per day
VOC Emis	sions				
VOC (tpy):	(Hours	of Engine Operation) *	(VOC Emission Factor) / (2,000 po	unds pe	r ton)
		12 hr/yr * 2.0	68 lb VOC/hr / 2000 lb/ton =	0.02	tons per year
VOC (ppd)	(Hours	of Engine Operation) *	,		
		•	68 lb VOC/hr =	3.97	pounds per day
VOC (TOS	(Hours		OSDay) * (VOC Emission Factor)		
		1.2 hr/OSday * 2.6	68 lb VOC/hr =	3.21	pounds per day
CO Emissi					
CO (tpy):	(Hours		(CO Emission Factor) / (2,000 pou		
			90 lb CO/hr / 2000 lb/ton =	0.13	tons per year
CO (ppd):	(Hours	of Engine Operation) *			
		1.5 hr/day * 21.9	90 lb CO/hr =	32.47	pounds per day
PM(Total)					
PM (tpy):	(Hours		(PM Emission Factor) / (2,000 pour		
			42 lb PM/hr / 2000 lb/ton =	0.02	tons per year
PM (ppd):	(Hours	of Engine Operation) *			
	_	1.5 hr/day * 3.4	42 lb PM/hr =	5.07	pounds per day
CO2 Emis		4	·		
CO2 (tpy):	(Hours		(CO2 Emission Factor) / (2,000 por		
000 ( 1)	/1.1		03 lb CO2/hr / 2000 lb/ton =	37.78	tons per year
CO2 (ppd):	(Hours	of Engine Operation) *		445.05	
NOO E'-		1.5 hr/day * 6371.0	03 lb CO2/hr = 9	445.05	pounds per day
N2O Emis		-f [i Oti) *	(NOO Fusianian Fantan) / (0.000 u.s.		
N2O (tpy):	(Hours		(N2O Emission Factor) / (2,000 por		
NOO (mmd).	/1 10		72 lb PM/hr / 2000 lb/ton =	0.32	tons per year
N2O (ppa):	(Hours	of Engine Operation) *		04.40	
CIIA Emis	-!	1.5 hr/day * 54.	/2 ID PIVI/IT =	81.12	pounds per day
CH4 (tp://		of Engine Operation) *	(CH4 Emission Footer) / (2 000 no	ında na	r ton)
∪⊓4 (tþy):	(Hours		(CH4 Emission Factor) / (2,000 pou 14   Ib CO2/hr / 2000 lb/ton =		
CH4 (nnd).	(Hours	of Engine Operation) *		0.00	toris per year
,	•	1.5 hr/day * 0	•	0.21	nounds per day

# **Emission Data - Building 9800C Loading Dock Emergency Generator**

Engine: Reg. #: KW (Out):		#1 9-1090 2280	
MONTH 2022	Fuel	Time	Runs
	(gallons)	(hours)	(days)
Jan	156	1.1	1
Feb	309.3	2.1	1
March	147.3	1.0	1
April	0.0	0.0	0
May	147.3	1.0	1
June	0.0	0.0	0
July	176.8	1.2	1
Aug	0.0	0.0	0
Sept	206.2	1.4	1
Oct	324.1	2.2	1
Nov	279.9	1.9	1
Dec	0.0	0.0	0
Total(yr)	1747	11.9	8
Total(OS)	530	3.6	3

Emergency Hours 0
Maint./Testing Hours 12

Note: Emission factors used are from Manufacturer Testing and AP-42.

35.69 lb NOx/hr same for N2O 2.68 lb VOC/hr same for CH4 21.90 lb CO/hr 3.42 lb PM/hr 6371.03 lb CO2/hr 54.72 lb N2O/hr

0.14 lb CH4/hr

### **Emission Calculations - Building 9700 Caterpillar Emergency Generator**

Engine #1 (Registration #9-0442)

**NOx Emissions** 

NOx (tpy): (Gallons of Diesel Consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

1,216 gal/yr \* 0.4384 lb NOx/gal / 2000 lb/ton = 0.27 tons per year

NOx (ppd): (Gallons of Diesel Consumed) \* (NOx Emission Factor)

121.6 gal/day \* 0.4384 lb NOx/gal = 53.31 pounds per day

NOx (TOSD): (Gallons of Diesel Consumed in OSDay) \* (NOx Emission Factor)

87.2 gal/OSday \* 0.4384 lb NOx/gal = 38.23 pounds per day

**VOC Emissions** 

VOC (tpy): (Gallons of Diesel Consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

1,216 gal/yr \* 0.01233 lb VOC/gal / 2000 lb/ton = 0.01 tons per year

VOC (ppd): (Gallons of Diesel Consumed) \* (VOC Emission Factor)

121.6 gal/day \* 0.01233 lb VOC/gal = 1.50 pounds per day

VOC (TOSD): (Gallons of Diesel Consumed in OSDay) \* (VOC Emission Factor)

87.2 gal/OSday \* 0.01233 lb VOC/gal = 1.08 pounds per day

**CO Emissions** 

CO (tpy): (Gallons of Diesel Consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

1,216 gal/yr \* 0.11645 lb CO/gal / 2000 lb/ton = 0.07 tons per year

CO (ppd): (Gallons of Diesel Consumed) \* (CO Emission Factor)

121.6 gal/day \* 0.11645 lb CO/gal = 14.16 pounds per day

**SOx Emissions** 

SOx (tpy): (Gallons of Diesel Consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

1,216 gal/yr \* 0.0069185 lb SOx/gal / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Gallons of Diesel Consumed) \* (SOx Emission Factor)

121.6 gal/day \* 0.0069185 lb SOx/gal = 0.84 pounds per day

PM(Total) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

1,216 gal/yr \* 0.0016988 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

121.6 gal/day \* 0.0016988 lb PM/gal = 0.21 pounds per day

PM(10) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

1,216 gal/yr \* 0.0002329 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

121.6 gal/day \* 0.0002329 lb PM/gal = 0.03 pounds per day

Page 119 of 169 Note: Emission Factors are from AP-42 for a diesel-fired generator with a horsepower rating of greater than 600.

# **Emission Calculations - Building 9700 Caterpillar Emergency Generator**

Engine #1 (Registration #9-0442)

PM(2.5) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

1,216 gal/yr \* 0.0065623 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

121.6 gal/day \* 0.0065623 lb PM/gal = 0.80 pounds per day

PM(Condensable) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

1,216 gal/yr \* 0.0010549 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

121.6 gal/day \* 0.0010549 lb PM/gal = 0.13 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Gallons of Diesel Consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

1,216 gal/yr \* 22.605 lb CO2/gal / 2000 lb/ton = 13.74 tons per year

CO2 (ppd): (Gallons of Diesel Consumed) \* (CO2 Emission Factor)

121.6 gal/day \* 22.605 lb CO2/gal = 2748.77 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Gallons of Diesel Consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

1,216 gal/yr \* 0.0011097 lb CH4/gal / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Gallons of Diesel Consumed) \* (CH4 Emission Factor)

121.6 gal/day \* 0.0011097 lb CH4/gal = 0.13 pounds per day

**Emission Data - Building 9700 Caterpillar Emergency Generator** 

Engine: Reg. #: BHP: KW (Output):		#1 9-0442 1340 1000	
MONTH	Diesel Fuel	Time	Runs
2022	(gallons)	(hours)	(days)
Jan	56	1.4	1
Feb	76	1.9	1
March	88	2.2	1
April	116	2.9	1
May	164	4.1	2
June	72	1.8	1
July	0	0.0	0
Aug	84	2.1	1
Sept	0	0.0	0
Oct	0	0.0	0
Nov	520	13.0	1
Dec	40	1.0	1
Total(yr)	1216	30.4	10
Total(OS)	436	10.9	5
	Eme	rgency Hours	0
	Maint./	Testing Hours	30.4

Note: Used AP-42 emission factors.

### **Emission Calculations - Cooper Avenue**

Detroit Emergency Generator (Registration #9-0804)

**NOx Emissions** 

NOx (tpy): (Gallons of Diesel Consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

575 gal/yr \* 0.4384 lb NOx/gal / 2000 lb/ton = 0.13 tons per year

NOx (ppd): (Gallons of Diesel Consumed) \* (NOx Emission Factor)

57.5 gal/day \* 0.4384 lb NOx/gal = 25.19 pounds per day

NOx (TOSD): (Gallons of Diesel Consumed in OSDay) \* (NOx Emission Factor)

57.6 gal/OSday \* 0.4384 lb NOx/gal = 25.25 pounds per day

**VOC Emissions** 

VOC (tpy): (Gallons of Diesel Consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

575 gal/yr \* 0.01233 lb VOC/gal / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Gallons of Diesel Consumed) \* (VOC Emission Factor)

57.5 gal/day \* 0.01233 lb VOC/gal = 0.71 pounds per day

VOC (TOSD): (Gallons of Diesel Consumed in OSDay) \* (VOC Emission Factor)

57.6 gal/OSday \* 0.01233 lb VOC/gal = 0.71 pounds per day

**CO Emissions** 

CO (tpy): (Gallons of Diesel Consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

575 gal/yr \* 0.11645 lb CO/gal / 2000 lb/ton = 0.03 tons per year

CO (ppd): (Gallons of Diesel Consumed) \* (CO Emission Factor)

57.5 gal/day \* 0.11645 lb CO/gal = 6.69 pounds per day

**SOx Emissions** 

SOx (tpy): (Gallons of Diesel Consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

575 gal/yr \* 0.006919 lb SOx/gal / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Gallons of Diesel Consumed) \* (SOx Emission Factor)

57.5 gal/day \* 0.006919 lb SOx/gal = 0.40 pounds per day

PM(Total) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

575 gal/yr \* 0.001699 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

 $57.5 \text{ gal/day}^*$  0.001699 lb PM/gal = 0.10 pounds per day

PM(10) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

575 gal/yr \* 0.000233 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

57.5 gal/day \* 0.000233 lb PM/gal = 0.01 pounds per day

Page 122 of 169 Note: Emission Factors are from AP-42 for a diesel-fired generator with a horsepower rating of greater than 600.

### **Emission Calculations - Cooper Avenue**

Detroit Emergency Generator (Registration #9-0804)

PM(2.5) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

575 gal/yr \* 0.006562 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

57.5 gal/day \* 0.006562 lb PM/gal = 0.38 pounds per day

PM(Condensable) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

575 gal/yr \* 0.001055 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

57.5 gal/day \* 0.001055 lb PM/gal = 0.06 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Gallons of Diesel Consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

575 gal/yr \* 22.605 lb CO2/gal / 2000 lb/ton = 6.49 tons per year

CO2 (ppd): (Gallons of Diesel Consumed) \* (CO2 Emission Factor)

57.5 gal/day \* 22.605 lb CO2/gal = 1298.79 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Gallons of Diesel Consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

575 gal/yr \* 0.00111 lb CH4/gal / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Gallons of Diesel Consumed) \* (CH4 Emission Factor)

57.5 gal/day \* 0.00111 lb CH4/gal = 0.06 pounds per day

# **Emission Data - Cooper Avenue Detroit Emergency Generator**

Engine:		#1						
Reg. #:	9-0804							
BHP:	805							
KW (Out):		600						
MONTH	Fuel	Time	Runs					
	(gallons)	(hours)	(days)					
Jan	24	1.0	1					
Feb	47	1.9	1					
March	96	4.0	1					
April	24	1.0	1					
May	0	0.0	0					
June	0	0.0	0					
July	0	0.0	0					
Aug	221	9.2	3					
Sept	43	1.8	1					
Oct	70	2.9	1					
Nov	50	2.1	1					
Dec	0	0.0	0					
Total(yr)	575	23.9	10					
Total(OS)	288	12.0	5					
	Emorgo	nev Houre	Λ					

Emergency Hours 0
Maint./Testing Hours 23.9

Note: Used AP42 emission factors

### **Emission Calculations - Building 9960 Emergency Generator**

Engine #1 (Registration #9-0806)

**NOx Emissions** 

NOx (tpy): (Gallons of Diesel Consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

191 gal/yr \* 0.61299 lb NOx/gal / 2000 lb/ton = 0.06 tons per year

NOx (ppd): (Gallons of Diesel Consumed) \* (NOx Emission Factor)

23.9 gal/day \* 0.61299 lb NOx/gal = 14.64 pounds per day

NOx (TOSD): (Gallons of Diesel Consumed in OSDay) \* (NOx Emission Factor)

10.8 gal/OSday \* 0.61299 lb NOx/gal = 6.63 pounds per day

**VOC Emissions** 

VOC (tpy): (Gallons of Diesel Consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

191 gal/yr \* 0.04932 lb VOC/gal / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Gallons of Diesel Consumed) \* (VOC Emission Factor)

23.9 gal/day \* 0.04932 lb VOC/gal = 1.18 pounds per day

VOC (TOSD): (Gallons of Diesel Consumed in OSDay) \* (VOC Emission Factor)

10.8 gal/OSday \* 0.04932 lb VOC/gal = 0.53 pounds per day

**CO Emissions** 

CO (tpy): (Gallons of Diesel Consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

191 gal/yr \* 0.13015 lb CO/gal / 2000 lb/ton = 0.01 tons per year

CO (ppd): (Gallons of Diesel Consumed) \* (CO Emission Factor)

23.9 gal/day \* 0.13015 lb CO/gal = 3.11 pounds per day

**SOx Emissions** 

SOx (tpy): (Gallons of Diesel Consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

191 gal/yr \* 0.0069185 lb SOx/gal / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Gallons of Diesel Consumed) \* (SOx Emission Factor)

23.9 gal/day \* 0.0069185 lb SOx/gal = 0.17 pounds per day

PM(Total) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

191 gal/yr \* 0.0016988 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

23.9 gal/day \* 0.0016988 lb PM/gal = 0.04 pounds per day

PM(10) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

191 gal/yr \* 0.0002329 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

23.9 gal/day \* 0.0002329 lb PM/gal = 0.01 pounds per day

Page 125 of 169 Note: Emission Factors are from AP-42 for diesel-fired generators with a horsepower rating of less than 600.

### **Emission Calculations - Building 9960 Emergency Generator**

Engine #1 (Registration #9-0806)

PM(2.5) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

191 gal/yr \* 0.0065623 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

23.9 gal/day \* 0.0065623 lb PM/gal = 0.16 pounds per day

PM(Condensable) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

191 gal/yr \* 0.0010549 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

23.9 gal/day \* 0.0010549 lb PM/gal = 0.03 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Gallons of Diesel Consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

191 gal/yr \* 22.605 lb CO2/gal / 2000 lb/ton = 2.16 tons per year

CO2 (ppd): (Gallons of Diesel Consumed) \* (CO2 Emission Factor)

23.9 gal/day \* 22.605 lb CO2/gal = 539.69 pounds per day

**CH4 Emissions** 

Page 126 of 169

CH4 (tpy): (Gallons of Diesel Consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

191 gal/yr \* 0.0011097 lb CH4/gal / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Gallons of Diesel Consumed) \* (CH4 Emission Factor)

23.9 gal/day \* 0.0011097 lb CH4/gal = 0.03 pounds per day

# **Emission Data - Building 9960 Emergency Generator**

Engine: Reg. #: BHP: KW (Out):		#1 9-0806 750 559	
MONTH 2022	Fuel (gallons)	Time (hours)	Runs (days)
	,	,	
Jan	0	0.0	0
Feb	21	1.1	1
March	17	0.9	1
April	4	0.2	1
May	15	0.8	1
June	0	0.0	0
July	13	0.7	1
Aug	0	0.0	0
Sept	0	0.0	0
Oct	32	1.7	1
Nov	80	4.2	1
Dec	8	0.4	1
Total(yr)	191	10.0	8
Total(OS)	32	1.7	3

Emergency Hours 0.0
Maint./Testing Hours 10.0

Note: Used AP-42 emission factors

### **Emission Calculations - Building 9703 Detroit Emergency Generator**

Engine #1 (Registration #9-0807)

**NOx Emissions** 

NOx (tpy): (Gallons of Diesel Consumed) \* (NOx Emission Factor) / (2,000 pounds per ton)

2,495 gal/yr \* 0.4384 lb NOx/gal / 2000 lb/ton = 0.55 tons per year

NOx (ppd): (Gallons of Diesel Consumed) \* (NOx Emission Factor)

191.9 gal/day \* 0.4384 lb NOx/gal = 84.14 pounds per day

NOx (TOSD): (Gallons of Diesel Consumed in OSDay) \* (NOx Emission Factor)

37.9 gal/OSday \* 0.4384 lb NOx/gal = 16.59 pounds per day

**VOC Emissions** 

VOC (tpy): (Gallons of Diesel Consumed) \* (VOC Emission Factor) / (2,000 pounds per ton)

2,495 gal/yr \* 0.01233 lb VOC/gal / 2000 lb/ton = 0.02 tons per year

VOC (ppd): (Gallons of Diesel Consumed) \* (VOC Emission Factor)

191.9 gal/day \* 0.01233 lb VOC/gal = 2.37 pounds per day

VOC (TOSD): (Gallons of Diesel Consumed in OSDay) \* (VOC Emission Factor)

37.9 gal/OSday \* 0.01233 lb VOC/gal = 0.47 pounds per day

**CO Emissions** 

CO (tpy): (Gallons of Diesel Consumed) \* (CO Emission Factor) / (2,000 pounds per ton)

2,495 gal/yr \* 0.11645 lb CO/gal / 2000 lb/ton = 0.15 tons per year

CO (ppd): (Gallons of Diesel Consumed) \* (CO Emission Factor)

191.9 gal/day \* 0.11645 lb CO/gal = 22.35 pounds per day

**SOx Emissions** 

SOx (tpy): (Gallons of Diesel Consumed) \* (SOx Emission Factor) / (2,000 pounds per ton)

2,495 gal/yr \* 0.0069185 lb SOx/gal / 2000 lb/ton = 0.01 tons per year

SOx (ppd): (Gallons of Diesel Consumed) \* (SOx Emission Factor)

191.9 gal/day \* 0.0069185 lb SOx/gal = 1.33 pounds per day

PM(Total) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

2,495 gal/yr \* 0.0016988 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

191.9 gal/day \* 0.0016988 lb PM/gal = 0.33 pounds per day

PM(10) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

2,495 gal/yr \* 0.0002329 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

191.9 gal/day \* 0.0002329 lb PM/gal = 0.04 pounds per day

Page 128 of 169 Note: Emission Factors are from AP-42 for a diesel-fired generator with a horsepower rating of greater than 600.

# **Emission Calculations - Building 9703 Detroit Emergency Generator**

Engine #1 (Registration #9-0807)

PM(2.5) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

2,495 gal/yr \* 0.0065623 lb PM/gal / 2000 lb/ton = 0.01 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

191.9 gal/day \* 0.0065623 lb PM/gal = 1.26 pounds per day

PM(Condensable) Emissions

PM (tpy): (Gallons of Diesel Consumed) \* (PM Emission Factor) / (2,000 pounds per ton)

2,495 gal/yr \* 0.0010549 lb PM/gal / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Gallons of Diesel Consumed) \* (PM Emission Factor)

191.9 gal/day \* 0.0010549 lb PM/gal = 0.20 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Gallons of Diesel Consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

2,495 gal/yr \* 22.605 lb CO2/gal / 2000 lb/ton = 28.20 tons per year

CO2 (ppd): (Gallons of Diesel Consumed) \* (CO2 Emission Factor)

191.9 gal/day \* 22.605 lb CO2/gal = 4338.39 pounds per day

**CH4 Emissions** 

CH4 (tpy): (Gallons of Diesel Consumed) \* (CH4 Emission Factor) / (2,000 pounds per ton)

2,495 gal/yr \* 0.0011097 lb CH4/gal / 2000 lb/ton = 0.00 tons per year

CH4 (ppd): (Gallons of Diesel Consumed) \* (CH4 Emission Factor)

191.9 gal/day \* 0.0011097 lb CH4/gal = 0.21 pounds per day

# **Emission Data - Building 9703 Detroit Emergency Generator**

Engine: Reg. #: BHP: KW (Out):		#1 9-0807 643 479	
MONTH 2022	Diesel Fuel (gallons)	Time (hours)	Runs (days)
Jan	(galloris) 67	2.0	(day3)
Feb	768	23.0	1
March	33	1.0	1
April	33	1.0	1
May	37	1.0	1
June	0	0.0	0
	43	1.3	1
July	43		
Aug	0	0.0	0
Sept	· ·	0.0	0
Oct	124	3.7	1
Nov	40	1.2	1
Dec	1349	40.4	5
Total(yr)	2495	74.7	13
Total(OS)	114	3.4	3

Emergency Hours 0.0 Maint./Testing Hours 74.7

Note: Emission Factors are from AP-42.

### **Emission Calculations - Visitor Control Points Emergency Generators**

Engine #1 (Registration #9-0967)

	_								
Ν	n	v	-	m	10	e i	$\boldsymbol{\cap}$	n	c
14	v	^	_	ш	ıo	ÐΙ	v		•

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

14 hr/yr \* 3.66 lb NOx/hr / 2000 lb/ton = 0.03 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

1.6 hr/day \* 3.66 lb NOx/hr = 5.68 pounds per day

NOx (TOSD): (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

1.0 hr/OSday \* 3.66 lb NOx/hr = 3.84 pounds per day

#### **VOC Emissions**

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

14 hr/yr \* 0.00 lb VOC/hr / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Hours of Engine Operation) \* (VOC Emission Factor)

1.6 hr/day \* 0.00 lb VOC/hr = 0.00 pounds per day

VOC (TOSD): (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

1.0 hr/OSday \* 0.00 lb VOC/hr = 0.00 pounds per day

#### **CO Emissions**

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

14 hr/yr \* 3.20 lb CO/hr / 2000 lb/ton = 0.02 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

1.6 hr/day \* 3.20 lb CO/hr = 4.97 pounds per day

#### **SOx Emissions**

SOx (tpy): (Hours of Engine Operation) \* (SOx Emission Factor) / (2,000 pounds per ton)

14 hr/yr \* 0.00 lb SOx/hr / 2000 lb/ton = 0.00 tons per year

SOx (ppd): (Hours of Engine Opeation) \* (SOx Emission Factor)

1.6 hr/day \* 0.00 lb SOx/hr = 0.00 pounds per day

#### **PM(Total) Emissions**

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

14 hr/yr \* 0.18 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

1.6 hr/day \* 0.18 lb PM/hr = 0.28 pounds per day

#### **CO2 Emissions**

CO2 (tpy): (Gallons of Diesel Consumed) \* (CO2 Emission Factor) / (2,000 pounds per ton)

589 gal/yr \* 22.605 lb CO2/gal / 2000 lb/ton = 6.66 tons per year

CO2 (ppd): (Gallons of Diesel Consumed) \* (CO2 Emission Factor)

65.5 gal/day \* 22.605 lb CO2/gal = 1479.95 pounds per day

# **Emission Data - Visitor Control Points Emergency Generators**

Engine:		@ VCC-1	
Reg. #:		9-0967	
KW (Out):		415	
MONTH	Diesel Fuel	Time	Runs
2022	(gallons)	(hours)	(days)
Jan	35	2.1	1
Feb	17	2.1	1
March	294	1.9	1
April	35	0.0	0
May	52	1.1	1
June	17	1.3	1
July	35	0.9	1
Aug	17	0.9	1
Sept	-	0.0	0
Oct	17	1.0	1
Nov	35	2.7	1
Dec	35	0.0	0
Total(yr)	589	14.0	9
Total(OS)	156	4.2	4

Emergency Hours 0
Maint./Testing Hours 14.0

Note: Emission factors are from USEPA Tier 3 Emission Limits and AP-42.

3.66 lb NOx/hr same for N2O

0.00 lb VOC/hr same for CH4

0.00 lb SOx/hr

3.20 lb CO/hr

0.18 lb PM/hr

22.605 lb CO2/gal

# **Emissions Calculations - Bldg 9816 South Generator Plant**

18 Engines (Registration 9-1035)

NOx Emissions				
Uncontrolled NOx (tpy):	(Hours of Engine Operation) *	(NOx Emission Factor) / (2,000 pour	nds per ton)	
	21.0 hr/yr *	51.7 lb NOx/hr / 2000		tons per year
Controlled NOx (tpy):		(NOx Emission Factor) / (2,000 pour		
	58.0 hr/yr *	4.3 lb NOx/hr / 2000	1b/ton = 0.12	tons per year
Uncontrolled NOx (ppd):	(Hours of Engine Operation) *			
	6.4 hr/day *	51.7 lb NOx/hr =	329.83	pounds per day
Controlled NOx (ppd):	(Hours of Engine Operation) *	(NOx Emission Factor)		
	17.6 hr/day*	4.3 lb NOx/hr =	75.77	pounds per day
Uncontrollled NOx (TOSD):	(Hours of Engine Operation) *	· ·		
	6.0 hr/day *	51.7 lb NOx/hr =	310.20	pounds per day
Controllled NOx (TOSD):	(Hours of Engine Operation) *	· ·		
	18.0 hr/day *	4.3 lb NOx/hr =	77.40	pounds per day
VOC Emissions				
VOC (tpy):		(Capacity of Engine) * (VOC Emission		
	79.0 hr/yr * 4038 bhp *			tons per year
VOC (ppd):		(Capacity of Engine) * (VOC Emission		
	24.0 hr/day * 4038 bhp			pounds per day
VOC (TOSD):		(Capacity of Engine) * (VOC Emission		
	24.0 hr/day * 4038 bhp	* 0.0010 lb VOC/bhp-hr =	94.01	pounds per day
CO Emissions				
CO (tpy):		(Capacity of Engine) * (CO Emission		•
( "	79.0 hr/yr * 4038 bhp *	•		tons per year
CO (ppd):		(Capacity of Engine) * (CO Emission	•	
DA4/T 4 IV E	24.0 hr/day * 4038 bhp	* 0.0014 lb CO/bhp-hr =	134.60	pounds per day
PM(Total) Emissions	//	(Oititititititi	Ft	4 \
PM(Total) (tpy):		(Capacity of Engine) * (PM Emission		
DM/Tatal) (and)	79.0 hr/yr * 4038 bhp *			tons per year
PM(Total) (ppd):		(Capacity of Engine) * (PM Emission		
CO2 Emissions	24.0 hr/day * 4038 bhp	* 0.0005 lb PM/bhp-hr =	51.28	pounds per day
	(Callara of Discal Consumed	* (CO2 Fraincian Franks) / (2 000 no		
CO2 (tpy):	11,952 gal/yr *	* (CO2 Emission Factor) / (2,000 po 6.1731 lb CO2/gal / 200		tono norvoor
CO2 (ppd):	(Gallons of Diesel Consumed		0 10/1011 = 36.69	tons per year
CO2 (ppd):	5,456 gal/day *	6.1731 lb CO2/gal =	22 602 52	pounds per day
N2O Emissions	5,450 gal/day	6.1731 lb CO2/gai =	33,063.33	pourius per day
N2O (tpy):	(Callons of Diosal Consumed	* (N2O Emission Factor) / (2,000 po	unds partan)	
N2Ο (ιργ).	11,952.4 gal/yr *	0.000176 lb N2O/bhp-hr/		tons per year
N2O (ppd):	(Gallons of Diesel Consumed		2000 15/1011 = 0.00	toris per year
1420 (ppd).	5,456.5 gal/day *	0.000176 lb N2O/bhp-hr =	0.06	pounds per day
CH4 Emissions	5,450.5 gallday	0.000170 Ib 1420/blip-lii =	0.30	pourids per day
CH4 (tpy):	(Hours of Engine Operation) *	(Capacity of Engine) * (CH4 Emission	n Factor) / (2 000 nounds ne	r ton)
C. 14 (1937).	79.0 hr/yr * 4038 bhp *			tons per year
CH4 (ppd):		(Capacity of Engine) * (CH4 Emission		isno por your
··· (PP4).		* 0.00006 lb CH4/bhp-hr =		pounds per day
	=	0.00000 0/billp iii	0.00	ao po. aay

#### Emission Data - 9816 South Generator Plant

(Registration 9-1035)

Engine:	#1				#2				#3			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	288	1.9	1	17	271	1.8	1	16	316	2.1	1	19
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	-	-	-	-	-	-	-	-	-	-	-	-
April	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	-	-	-	-	-	-	-	-	-	-	-	-
July	255	1.6	1	10	354	2.1	1	14	156	1.0	1	7
Aug	-	-	-	-	-	-	-	-	-	-	-	-
Sept	-	-	-	-	-	-	-	-	-	-	-	-
Oct	-	-	-	-	-	-	-	-	-	-	-	-
Nov	156	1	1	-	105	1	1	-	79	1	1	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	699	4.6	3	27	731	4.6	3	30	551	3.6	3	25
Total(OS)	255	1.6	1	10	354	2.1	1	14	156	1.0	1	7

Emergency Hours 0 Emergency Hours 0 Emergency Hours 0

Maint./Testing Hours 4.6 Maint./Testing Hours 3.6

#4 Engine: #5 #6 MONTH Diesel Fuel Runs Runs Time Urea Diesel Fuel Time Runs Urea Diesel Fuel Time Urea 2022 (gallons) (gallons) (hours) (days) (gallons) (gallons) (hours) (days) (gallons) (hours) (days) (gallons) Jan 318 2.1 Feb March April May June 303 12 297 343 2.2 July 1.9 1.8 12 Aug Sept Oct Nov 334 2 167 1 Dec Total(yr) 954 6.4 3 31 782 5.0 3 30 659 4.3 33 303 12 297 12 343 14 Total(OS) 1.9 2.2 1.8

 Emergency Hours
 0
 Emergency Hours
 0
 Emergency Hours
 0

 Maint./Testing Hours
 6.4
 Maint./Testing Hours
 5.0
 Maint./Testing Hours
 4.3

Note: NOx and CO2 emissions rate based upon stack test data.

All others based on manufacturer's testing data or EPA

Emission Factor (N2O).

4.3 lb NOx/hr controlled

51.7 lb NOx/hr uncontrolled

0.0010 lb VOC/bhp-hr

0.0014 lb CO/bhp-hr

0.0005 lb PM/bhp-hr

6.17 lb CO2/hr

0.000176 lb N2O/gal

0.00006 lb CH4/bhp-hr

SOx assumed negligible

total diesel fuel 11952

Maint./Testing Hours 4.3

(Registration 9-1035)

Engine:	#7				#8				#9			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	301	2.0	1	18	318	2.1	1	19	301	2.0	1	18
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	-	-	-	-	-	-	-	-	-	-	-	-
April	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	-	-	-	-	-	-	-	-	-	-	-	-
July	285	1.9	1	12	322	2.1	1	14	364	2.3	1	15
Aug	-	-	-	-	-	-	-	-	-	-	-	-
Sept	-	-	-	-	-	-	-	-	-	-	-	-
Oct	-	-	-	-	-	-	-	-	-	-	-	-
Nov	166	1	1	-					-	-	-	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	753	5.0	3	30	641	4.2	2	32	666	4.3	2	33
Total(OS)	285	1.9	1	12	322	2.1	1	14	364	2.3	1	15
	Emergen	cy Hours	0		Emerge	ncy Hours	0		Emerge	ncy Hours	0	
	Maint./Testi	ng Hours	5.0		Maint./Test	ing Hours	4.2		Maint./Test	ting Hours	4.3	

Engine:	#10				#11				#12			
MONTH 2022	Diesel Fuel (gallons)	Time (hours)	Runs (days)	Urea (gallons)	Diesel Fuel (gallons)	Time (hours)	Runs (days)	Urea (gallons)	Diesel Fuel (gallons)	Time (hours)	Runs (days)	Urea (gallons)
Jan	303	2.0	-	18	150	1.0	1	9	331	2.2	1	19
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	-	-	-	-	-	-	-	-	-	-	-	-
April	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	-	-	-	-	-	-	-	-	-	-	-	-
July	359	2.3	1	15	310	2.1	1	14	163	1.3	1	9
Aug	-	-	-	-	-	-	-	-	-	-	-	-
Sept	-	-	-	-	-	-	-	-	-	-	-	-
Oct	-	-	-	-	-	-	-	-	-	-	-	-
Nov	-	-	-	-	-	-	-	-	-	-	-	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	662	4.3	1	33	461	3.1	2	23	494	3.5	2	28
Total(OS)	359	2.3	1	15	310	2.1	1	14	163	1.3	1	9
	Emerger	cy Hours	0		Emerge	ncy Hours	0		Emerge	ncy Hours	0	

Maint./Testing Hours 3.1

Maint./Testing Hours 3.5

(Registration 9-1035)

Engine:	#13				#14				#15			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	333	2.2	1	19	288	1.9	1	17	334	2.2	1	19
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	-	-	-	-	-	-	-	-	-	-	-	-
April	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	-	-	-	-	-	-	-	-	-	-	-	-
July	302	2.0	1	13	309	2.0	1	13	388	2.4	1	16
Aug	-	-	-	-	-	-	-	-	-	-	-	-
Sept	-	-	-	-	-	-	-	-	-	-	-	-
Oct	-	-	-	-	-	-	-	-	-	-	-	-
Nov	-	-	-	-	-	-	-	-	-	-	-	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	636	4.2	2	33	597	3.9	2	30	721	4.6	2	35
Total(OS)	302	2.0	1	13	309	2.0	1	13	388	2.4	1	16
	Emerger	cy Hours	0		Emerge	ncy Hours	0		Emerger	ncy Hours	0	
	Maint./Testi	ng Hours	4.2		Maint./Test	ting Hours	3.9		Maint./Test	ing Hours	4.6	

Engine:	#16				#17				#18			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	331	2.2	1	19	303	2.0	1	18	301	2.0	1	18
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	5	0.2	1	-	-	-	-	-	-	-	-	-
April	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	-	-	-	-	-	-	-	-	-	-	-	-
July	299	2.0	1	13	287	1.7	1	11	422	3.3	1	22
Aug	-	-	-	-	-	-	-	-	-	-	-	-
Sept	-	-	-	-	-	-	-	-	-	-	-	-
Oct	-	-	-	-	-	-	-	-	-	-	-	-
Nov	-	-	-	-	-	-	-	-	-	-	-	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	635	4.4	3	33	590	3.7	2	29	723	5.3	2	39
Total(OS)	299	2.0	1	13	287	1.7	1	11	422	3.3	1	22
	Emerger	ncy Hours	0		Emerger	ncy Hours	0		Emergen	ncy Hours	0	
	Maint./Testi	ng Hours	4.4		Maint./Test	ing Hours	3.7		Maint./Testi	ng Hours	5.3	

### **Emissions Calculations - Bldg 9950 North Generator Plant**

24 Engines (Registration 9-1055)

NOx Emissions					
Uncontrolled NOx (tpy):	(Hours of Engine Operation) *	(NOx Emission F	actor) / (2,000 pounds per ton)		
	29.0 hr/yr *		lb NOx/hr / 2000 lb/ton =	0.55	tons per year
Controlled NOx (tpy):	(Hours of Engine Operation) *	(NOx Emission F	actor) / (2,000 pounds per ton)		
	63.2 hr/yr *		lb NOx/hr / 2000 lb/ton =	0.10	tons per year
Uncontrolled NOx (ppd):	(Hours of Engine Operation) *	(NOx Emission F	actor)		
	7.5 hr/day *		lb NOx/hr =	287.61	pounds per day
Controlled NOx (ppd):	(Hours of Engine Operation) *				
	16.5 hr/day*		lb NOx/hr =	51.00	pounds per day
Uncontrollled NOx (TOSD):	(Hours of Engine Operation) *				
0 (                (TOOD)	6.0 hr/day *		lb NOx/hr =	228.60	pounds per day
Controllled NOx (TOSD):	(Hours of Engine Operation) *	•	,	FF 00	
VOC Emissions	18.0 hr/day *	3.1	lb NOx/hr =	55.80	pounds per day
VOC (tpy):	(Hours of Engine Operation) *	(Capacity of Eng	ine) * (VOC Emission Factor) / (2	000 nounds i	oor ton)
VOC (tpy).			lb VOC/bhp-hr / 2000 lb/ton =		
VOC (ppd):	(Hours of Engine Operation) *			0.09	toris per year
VOC (ppu).	24.0 hr/day * 4002 bhp			44 89	pounds per day
VOC (TOSD):	(Hours of Engine Operation) *			44.00	pourido por day
100 (1002).	24.0 hr/day * 4002 bhp			44 89	pounds per day
CO Emissions	a.,	0.0000			poundo por ua)
CO (tpy):	(Hours of Engine Operation) *	(Capacity of Eng	ine) * (CO Emission Factor) / (2,0	000 pounds pe	er ton)
(13)			lb CO/bhp-hr / 2000 lb/ton =		
CO (ppd):	(Hours of Engine Operation) *				
	24.0 hr/day * 4002 bhp	* 0.0014	lb CO/bhp-hr =	133.40	pounds per day
PM(Total) Emissions					
PM(Total) (tpy):			ine) * (PM Emission Factor) / (2,0		
			lb PM/bhp-hr / 2000 lb/ton =	0.03	tons per year
PM(Total) (ppd):	(Hours of Engine Operation) *				
	24.0 hr/day * 4002 bhp	* 0.0005	lb PM/bhp-hr =	50.82	pounds per day
CO2 Emissions	(0.11				
CO2 (tpy):		' '	Factor) / (2,000 pounds per ton)		
000 (500 4)	10,859 gal/yr *		lb CO2/gal / 2000 lb/ton =	55.43	tons per year
CO2 (ppd):	(Gallons of Diesel Consumed)			40 440 00	
N2O Emissions	4,715.0 gal/yr *	10.21	lb CO2/gal =	40,140.02	pounds per day
N2O (tpy):	(Callons of Dissal Consumed)	* (N2O Emission	Factor) / (2,000 pounds per ton)		
Ν2Ο (ιργ).	10,859 gal/yr *		lb N2O/bhp-hr / 2000 lb/ton =		tons per year
N2O (ppd):	(Gallons of Diesel Consumed)			0.00	toris per year
1420 (ppd).	4,715 gal/day *		lb N2O/bhp-hr =	0.83	pounds per day
CH4 Emissions	.,. to garday	0.000170		0.00	position por day
CH4 (tpy):	(Hours of Engine Operation) *	(Capacity of Eng	ine) * (CH4 Emission Factor) / (2	,000 pounds r	per ton)
(17)			lb CH4/bhp-hr / 2000 lb/ton =		
OLIA (** ** *1)	(11				. ,

(Hours of Engine Operation) \* (Capacity of Engine) \* (CH4 Emission Factor)

0.00006 lb CH4/bhp-hr =

24.0 hr/day \* 4002 bhp \*

0.00 pounds per day

CH4 (ppd):

(Registration #9-1055)

Engine:	#1				#2				#3			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	-	-	-	-	-	-	-	-	-	-	-	-
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	122	0.8	1.0	0	106	0.7	1.0	0	119	0.8	1.0	0
April	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	11	0.2	1.0	-	-	-	-	-	13	0.2	1.0	-
July	-	-	-	-	-	-	-	-	-	-	-	-
Aug	-	-	-	-	-	-	-	-	-	-	-	-
Sept	326	2.9	1.0	10	287	2.3	1.0	8	319	2.7	1.0	10
Oct	-	-	-	-	-	-	-	-	-	-	-	-
Nov	-	-	-	-	-	-	-	-	-	-	-	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	459	3.9	3	11	393	3.0	2	8	450	3.7	3	10
Total(OS)	337	3.1	2	10	287	2.3	1	8	331	2.9	2	10
	Emerger	ncy Hours	0		Emerge	ncy Hours	0		Emerger	ncy Hours	0	

Emergency Hours 0 Emergency Hours 0 Emergency Hours

Maint./Testing Hours 3.9 Maint./Testing Hours 3.0 Maint./Testing Hours

#4 #5 #6 Engine: MONTH Diesel Fuel Time Runs Urea Diesel Fuel Time Runs Urea Diesel Fuel Time Runs Urea 2022 (hours) (days) (gallons) (hours) (days) (gallons) (gallons) (gallons) (hours) (days) (gallons) (gallons) Jan Feb March 121 0 650 10 2 2 117 April May 11 June July Aug Sept 265 286 Oct Nov Dec 0.2 1.0 1.0 0.2 1.0 Total(yr) 389 417 3.0 3 655 9.8 3 3.6 4 Total(OS) 265 2.0 1 7 0 0.0 0 297 2.6 2 **Emergency Hours** 0 **Emergency Hours Emergency Hours** 0 0 Maint./Testing Hours 3.0 Maint./Testing Hours 9.8 Maint./Testing Hours 3.6

Note: NOx and CO2 emissions rate based upon stack test data.
All others based on manufacturer's testing data or EPA
Emission Factor (CO2 and N2O).

3.1 lb NOx/hr controlled
38.1 lb NOx/hr uncontrolled
38.1 lb NOx/hr uncontrolled
0.0005 lb VOC/bhp-hr
0.0013 lb CO/bhp-hr
0.0002 lb PM/bhp-hr
10.21 lb CO2/gal
0.000176 lb N2O/gal
0.00006 lb CH4/bhp-hr

SOx assumed negligible

total diesel fuel 10859

3.7

(Registration #9-1055)

Engine:	#7				#8				#9			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	-	-	-	-	-	-	-	-	-	-	-	-
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	119	1	1	0	122	1	1	0	115	1	1	0
April	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	-	-	-	-	-	-	-	-	-	-	-	-
July	-	-	-	-	-	-	-	-	-	-	-	-
Aug	-	-	-	-	-	-	-	-	-	-	-	-
Sept	295	3	1	9	296	3	1	10	296	3	1	10
Oct	-	-	-	-	-	-	-	-	-	-	-	-
Nov	-	-	-	-	-	-	-	-	-	-	-	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	414	3.4	2	10	418	3.5	2	10	410	3.5	2	10
Total(OS)	295	2.6	1	9	296	2.7	1	10	296	2.7	1	10
	Emergen	•	0		•	cy Hours	0			ncy Hours	0	
	Maint./Testi	ng Hours	3.4		Maint./Testi	ng Hours	3.5		Maint./Testi	ng Hours	3.5	
Engine:	#10				#11				#12			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(1 )	(days)	(gallons)	(gallons)	/h \	(-1)	(gallons)	(gallons)	/h \	/-l\	(gallons)
Jan		(hours)	(uays)	(gallons)	(galions)	(hours)	(days)	(gallolis)	(galions)	(hours)	(days)	
	-	(nours)	-	(galloris)	(gallons)	(nours)	(days)	-	- (gallons)	(nours)	(days)	-
Feb	- -	(nours) - -	- -	(gallons)	- -	- -	(days) - -	- -	- -	- -	(days) - -	- -
	- - 127	- - 1	- - 1	- - 0	(galloris) - - - 118	- - 1	- - 1	- - 0	- - - 117	- - 1	- - 1	- - 0
Feb March April	- -		- -	- -	- -	(nours) - - 1 -	-		- -		- -	- - 0
Feb March April May	- - 127 - -		- -	- -	- - 118 - -	(nours) 1 -	-		- - 117 - -		- -	- - 0 -
Feb March April May June	- -		- -	- -	- -	(nours) 1 1	-		- -		- -	- - 0 - -
Feb March April May June July	- - 127 - -	- - 1 -	- - 1 -	- -	- - 118 - -	- - 1 -	- - 1 -		- - 117 - -	- - 1 -	- - 1 -	- - 0 - - -
Feb March April May June	- - 127 - - - 58 -	- - 1 - - 1	- - 1 -	- -	- 118 - - - 63 -	- - 1 -	- - 1 -		- 117 - - - 58 -	- - 1 - - 1 -	- - 1 -	- - 0 - - - -
Feb March April May June July Aug Sept	- - 127 - -	- - 1 -	- - 1 -	- -	- - 118 - -	- - 1 -	- - 1 -		- - 117 - - - 58	- - 1 -	- - 1 -	- - 0 - - - - - 7
Feb March April May June July Aug	- - 127 - - - 58 -	- - 1 - - 1	- - 1 - - 1 -	- - 0 - - - -	- 118 - - - 63 -	- - 1 - - 1 -	1 - - - 1	- - 0 - - -	- 117 - - - 58 -	- - 1 - - 1 -	1 - - - - 1 -	- - 0 - - - - - 7
Feb March April May June July Aug Sept Oct Nov	- - 127 - - - 58 -	- - 1 - - 1	- - 1 - - 1 -	- - 0 - - - -	- 118 - - - 63 -	- - 1 - - 1 -	1 - - - 1	- - 0 - - -	- 117 - - - 58 -	- - 1 - - 1 -	1 - - - - 1 -	- - 0 - - - - - 7
Feb March April May June July Aug Sept Oct Nov Dec	- - 127 - - - 58 -	- - 1 - - 1	- - 1 - - 1 -	- - 0 - - - -	- 118 - - - 63 -	- - 1 - - 1 -	1 - - - 1	- - 0 - - -	- 117 - - - 58 -	- - 1 - - 1 -	1 - - - - 1 -	- - 0 - - - - - - 7
Feb March April May June July Aug Sept Oct Nov Dec Total(yr)	- 127 - - 58 - - 255 - - - 440	1 - - 1 - - - - - - - - - - - - - - - -	1 - 1 - 1 - 1 - 1 - 1 - 3	- 0 - - - 7	- - 118 - - 63 - - 255 - - - - 436	- - 1 - - 1 - - 2 - - - - 3.3	1 - 1 - 1 - 1	- - 0 - - - - 7 - 7	- - 117 - - 58 - - - 254 - - - - 428	- - - 1 - - - - 2 - - - - - - - - - - -	1 - 1 - 1 - 1 - 1	- - 0 - - - - - 7 - - 7
Feb March April May June July Aug Sept Oct Nov Dec	- 127 - - 58 - - 255 - -	- - 1 - - 1 - - 2 -	1 - 1 - 1 - 1 - 2 - 3 2	- 0 - - - - 7 - -	- 118 - - 63 - - 255 -	- - 1 - - 1 - - 2 -	1 - 1 - 1 - 1 - 3 2	- - 0 - - - - - 7 - -	- 117 - - 58 - - 254 -	- - 1 - - 1 - - 2	1 - 1 - 1 - 1 - 2 - 3 2	- - 0 - - - - 7 - - 7
Feb March April May June July Aug Sept Oct Nov Dec Total(yr)	- 127 - - 58 - - 255 - - - 440	1 - 1 - 2 3.3 2.4	1 - 1 - 1 - 1 - 2 - 3 2 0	- 0 - - - 7	- - 118 - - 63 - - 255 - - - - 436 317	- - 1 - - 1 - - 2 - - - - 3.3	1 - 1 - 1 - 1 - 2 - 3 2 0	- - 0 - - - - 7 - 7	- - 117 - - 58 - - 254 - - - - - 428 312	- - - 1 - - - - 2 - - - - - - - - - - -	1 - 1 - 1 - 1 - 1 - 2 - 2 0	- - - - - 7 - -
Feb March April May June July Aug Sept Oct Nov Dec Total(yr)	- - 127 - - 58 - - 255 - - - - 440 313	1 - 1 - 2 - 2 - 3.3 2.4 cy Hours	1 - 1 - 1 - 1 - 2 - 3 2	- 0 - - - 7	- - 118 - - 63 - - 255 - - - - 436 317	- - 1 - - 1 - 2 - - - - 3.3 2.5	1 - 1 - 1 - 1 - 3 2	- - 0 - - - - 7 - 7	- - 117 - - 58 - - 254 - - - - - 428 312	1 - 1 - 2	1 - 1 - 1 - 1 - 2 - 3 2	- - - - - 7 - -

(Registration #9-1055)

Engine:	#13				#14				#15			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	-	-	-	-	-	-	-	-	-	-	-	-
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	119	1	1	0	122	1	1	0	120	1	1	0
April	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	15	0	1	-	-	-	-	-	-	-	-	-
July	-	-	-	-	-	-	-	-	-	-	-	-
Aug	-	-	-	-	-	-	-	-	-	-	-	-
Sept	269	2	1	5	283	3	1	6	277	2	1	6
Oct	-	-	-	-	-	-	-	-	-	-	-	-
Nov	-	-	-	-	-	-	-	-	-	-	-	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	403	3.1	3	5	404	3.3	2	6	397	3.2	2	(
Total(OS)	284	2.3	2	5	283	2.5	1	6	277	2.4	1	(
		cy Hours	0			cy Hours	0			ncy Hours	0	
	Maint./Testi	ng Hours	3.1		Maint./Test	ng Hours	3.3		Maint./Test	ing Hours	3.2	
Engine:	#16				#17				#18			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	-	-	-	-	-	-	-	-	-	-	-	-
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	120	1	1	0	123	1	1	0	122	1	1	0
April	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	-	-	-	-	-	-	-	-	-	-	-	-
July	-	-	-	-	-	-	-	-	-	-	-	-
Aug	-	-	-	-	-	-	-	-	-	-	-	-
Sept	277	3	1	6	267	2	1	5	260	2	1	5
Oct	-	-	-	-	-	-	-	-	-	-	-	-
Nov	-	-	-	-	-	-	-	-	-	-	-	-
				-	-	-	-	-	-	-	-	-
Dec	-	-										
Dec Total(yr)	397	3.5	2	7	389	3.1	2	6	382	2.8	2	;
Dec Total(yr)	277	2.7	1	7 6	267	2.3	1	6 5	260	2.0	1	ţ
Dec	277 Emerger	2.7 icy Hours	0		267 Emerger	2.3 ncy Hours	0		260 Emerger	2.0 ncy Hours	0	ţ
otal(yr)	277	2.7 icy Hours	1		267	2.3 ncy Hours	1		260	2.0 ncy Hours	1	

(Registration #9-1055)

Engine:	#19				#20				#21			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	-	-	-	-	-	-	-	-	-	-	-	-
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	151	1	1	0	126	1	1	0	126	1	1	0
April	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	-	-	-	-	-	-	-	-	-	-	-	-
July	-	-	-	-	-	-	-	-	-	-	-	-
Aug	-	-	-	-	-	-	-	-	-	-	-	-
Sept	321	3	1	7	435	4	1	9	469	4	1	9
Oct	-	-	-	-	-	-	-	-	_	-	-	-
Nov	-	-	-	-	-	-	-	-	_	-	-	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	472	3.9	2	7	561	4.6	2	9	595	4.8	2	10
Total(OS)	321	2.9	1	7	435	3.8	1	9	469	4.0	1	g
	Emergen	cy Hours	0		Emerger	cy Hours	0		Emerger	ncy Hours	0	
	Maint./Testi	ng Hours	3.9		Maint./Testi	ng Hours	4.6		Maint./Testi	ing Hours	4.8	
Engine:	#22				#23				#24			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
MONTH 2022		Time (hours)	Runs (days)	Urea (gallons)		Time (hours)	Runs (days)	Urea (gallons)		Time (hours)	Runs (days)	Urea (gallons)
MONTH 2022 Jan	Diesel Fuel				Diesel Fuel				Diesel Fuel			
MONTH 2022 Jan Feb	Diesel Fuel (gallons)		(days) - -	(gallons) - -	Diesel Fuel (gallons)			(gallons) - -	Diesel Fuel (gallons)	(hours) - -	(days) - -	(gallons) - -
MONTH 2022 Jan Feb March	Diesel Fuel				Diesel Fuel				Diesel Fuel			
MONTH 2022 Jan Feb March April	Diesel Fuel (gallons)		(days) - -	(gallons) - -	Diesel Fuel (gallons)			(gallons) - -	Diesel Fuel (gallons)	(hours) - -	(days) - -	(gallons) - -
MONTH 2022 Jan Feb March April May	Diesel Fuel (gallons)		(days) - -	(gallons) - -	Diesel Fuel (gallons)			(gallons) - -	Diesel Fuel (gallons)	(hours) - -	(days) - -	(gallons) - -
MONTH 2022 Jan Feb March April May June	Diesel Fuel (gallons)		(days) - -	(gallons) - -	Diesel Fuel (gallons)			(gallons) - -	Diesel Fuel (gallons)	(hours) - -	(days) - -	(gallons) - -
MONTH 2022 Jan Feb March April May June July	Diesel Fuel (gallons)		(days) - -	(gallons) - -	Diesel Fuel (gallons)			(gallons) - -	Diesel Fuel (gallons)	(hours) - -	(days) - -	(gallons) - -
MONTH 2022 Jan Feb March April May June July Aug	Diesel Fuel (gallons)  176	(hours) 1	(days) - -	(gallons) - 0 - 0	Diesel Fuel (gallons)  124	(hours) 1		(gallons) - 0 - 0	Diesel Fuel (gallons)  106	(hours) 1	(days) - -	(gallons)
MONTH 2022 Jan Feb March April May June July Aug Sept	Diesel Fuel (gallons)		(days) - -	(gallons) - -	Diesel Fuel (gallons)			(gallons) - -	Diesel Fuel (gallons)	(hours) - -	(days) - -	(gallons) - -
MONTH 2022  Jan Feb March April May June July Aug Sept Oct	Diesel Fuel (gallons)  176	(hours) 1	(days) 1	(gallons) - 0 - 0	Diesel Fuel (gallons)  124	(hours) 1	(days) 1	(gallons) - 0 - 0	Diesel Fuel (gallons)  106	(hours) 1	(days) 1	(gallons)
MONTH 2022 Jan Feb March April May June July Aug Sept Oct Nov	Diesel Fuel (gallons)  176	(hours) 1	(days) 1	(gallons) - 0 - 0	Diesel Fuel (gallons)  124	(hours) 1	(days) 1	(gallons) - 0 - 0	Diesel Fuel (gallons)  106	(hours) 1	(days) 1	(gallons)
MONTH 2022  Jan Feb March April May June July Aug Sept Oct	Diesel Fuel (gallons)  176	(hours) 1	(days) 1	(gallons) - 0 - 0	Diesel Fuel (gallons)  124	(hours) 1	(days) 1	(gallons) - 0 - 0	Diesel Fuel (gallons)  106	(hours) 1	(days) 1	(gallons)
MONTH 2022  Jan Feb March April May June July Aug Sept Oct Nov Dec Total(yr)	Diesel Fuel (gallons)	(hours)	(days)	(gallons)	Diesel Fuel (gallons)	(hours) 1 4.1	(days)	(gallons)	Diesel Fuel (gallons)	(hours) 1 4.1	(days)	(gallons)
MONTH 2022  Jan Feb March April May June July Aug Sept Oct Nov Dec	Diesel Fuel (gallons)	(hours) 1	(days)	(gallons)	Diesel Fuel (gallons)  124 382	(hours) 1 3	(days)	(gallons)	Diesel Fuel (gallons) 106 386	(hours) 1 3	(days) 1	(gallons)
MONTH 2022  Jan Feb March April May June July Aug Sept Oct Nov Dec Total(yr)	Diesel Fuel (gallons)	(hours)	(days)	(gallons)	Diesel Fuel (gallons)	(hours) 1 4.1	(days) 1 1 1 - 1 - 1 - 0 1 - 0	(gallons)	Diesel Fuel (gallons)	(hours) 1 4.1	(days) 1 1 1 1 0 1 - 0	(gallons)
MONTH 2022  Jan Feb March April May June July Aug Sept Oct Nov Dec Total(yr)	Diesel Fuel (gallons)	(hours)	(days)	(gallons)	Diesel Fuel (gallons)	(hours)	(days)	(gallons)	Diesel Fuel (gallons)	(hours)	(days) 1 1 1 - 1 - 1	(gallons)

# **Emissions Calculations - Bldg 9000 Generator Yard**

7 Engines (Registration 9-1091)

NOx Emissions					
Uncontrolled NOx (tpy):	(Hours of Engine Operation) *	(NOx Emission	Factor) / (2,000 pounds per tor	٦)	
	42.5 hr/yr *	65.4	lb NOx/hr / 2000 lb/ton =	1.39	tons per year
Controlled NOx (tpy):		(NOx Emission	Factor) / (2,000 pounds per tor	n)	
	226.8 hr/yr *	4.0	lb NOx/hr / 2000 lb/ton =	0.45	tons per year
Uncontrolled NOx (ppd):	(Hours of Engine Operation) *	(NOx Emission	Factor)		
	11.1 hr/day *	65.4	lb NOx/hr =	723.96	pounds per day
Controlled NOx (ppd):	(Hours of Engine Operation) *	(NOx Emission	Factor)		
	59.0 hr/day*		lb NOx/hr =	236.15	pounds per day
Uncontrollled NOx (TOSD):	(Hours of Engine Operation) *	(NOx Emission	Factor)		
	6.0 hr/day *		lb NOx/hr =	392.64	pounds per day
Controllled NOx (TOSD):	(Hours of Engine Operation) *	•	*		
	18.0 hr/day *	4.0	lb NOx/hr =	72.00	pounds per day
VOC Emissions					
VOC (tpy):			ngine) * (VOC Emission Factor)		
	269.3 hr/yr * 4002 bhp *		lb VOC/bhp-hr / 2000 lb/ton =		tons per year
VOC (ppd):			ngine) * (VOC Emission Factor)		
\(\(\text{O}\) (\(\text{T}\) (\(\text{O}\))	70.1 hr/day * 4002 bhp		Ib VOC/bhp-hr =		pounds per day
VOC (TOSD):			ngine) * (VOC Emission Factor)		
CO Emissisms	24.0 hr/day * 4002 bhp	0.0019	lb VOC/bhp-hr =	182.10	pounds per day
CO (tp://:	(Hours of Engine Operation) *	(Congoity of Er	ngine) * (CO Emission Factor) /	(2.000 pounds	nor ton)
CO (tpy):	269.3 hr/yr * 4002 bhp *		lb CO/bhp-hr / 2000 lb/ton =		tons per year
CO (ppd):			ngine) * (CO Emission Factor)	5.21	toris per year
оо (ppa).	70.1 hr/day * 4002 bhp		lb CO/bhp-hr =	380 64	pounds per day
PM(Total) Emissions	70.1 111/day 4002 blip	0.0014	15 00/5/1p-/// –	303.04	pourius per day
PM(Total) (tpy):	(Hours of Engine Operation) *	(Capacity of Fr	ngine) * (PM Emission Factor) /	(2 000 pounds	ner ton)
: m(13tal) (tpy).	269.3 hr/yr * 4002 bhp *		lb PM/bhp-hr / 2000 lb/ton =		tons per year
PM(Total) (ppd):	(Hours of Engine Operation) *			0.00	10.10 po. you.
( ) (( )	70.1 hr/day * 4002 bhp		Ib PM/bhp-hr =	148.43	pounds per day
CO2 Emissions	,		·		
CO2 (tpy):	(Hours of Engine Operation) *	(CO2 Emission	Factor) / (2,000 pounds per to	า)	
	269.3 hr/yr *		lb CO2/hr / 2000 lb/ton =		tons per year
CO2 (ppd):	(Hours of Engine Operation) *	(CO2 Emission	Factor)		
	70.1 hr/yr *	4290	lb CO2/hr =	300,728.07	pounds per day
N2O Emissions					
N2O (tpy):			ngine) * (N2O Emission Factor)		
	269.3 hr/yr * 4002 bhp *		lb N2O/bhp-hr / 2000 lb/ton =	10.23	tons per year
N2O (ppd):			ngine) * (N2O Emission Factor)		
	70.1 hr/day * 4002 bhp	* 0.0190	lb N2O/bhp-hr =	5,325.05	pounds per day
CH4 Emissions					
CH4 (tpy):			ngine) * (CH4 Emission Factor)		
0114 ( 1)	269.3 hr/yr * 4002 bhp *		lb CH4/bhp-hr / 2000 lb/ton =	1.02	tons per year
CH4 (ppd):			ngine) * (CH4 Emission Factor)	0.07	
	70.1 hr/day * 4002 bhp	0.00190	lb CH4/bhp-hr =	0.27	pounds per day

(Registration #9-1091)

Engine:	#1				#2				#3			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	2,535	31.2	10.0	25	862	10.6	5.0	8	2,985	37.0	10.0	29
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	-	-	-	-	-	-	-	-	-	-	-	-
April	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	-	-	-	-	-	-	-	-	78	0.7	1.0	0
July	-	-	-	-	-	-	-	-	-	-	-	-
Aug	468	4.4	1.0	-	-	-	-	-	299	1.9	1.0	-
Sept	-	-	-	-	486	4.4	1.0	-	-	-	-	-
Oct	217	1.5	1.0	3	215	1.5	1.0	3	215	1.5	1.0	3
Nov	-	-	-	-	-	-	-	-	-	-	-	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	3220	37.1	12	27	1563	16.5	7	11	3577	41.1	13	32
Total(OS)	468	4.4	1	0	486	4.4	1	0	377	2.6	2	0

Note: NOx emissions rate based upon stack test data. All others based on manufacturer's testing data.

93.5%

4.0 lb NOx/hr controlled 65.4 lb NOx/hr uncontrolled 0.0019 lb VOC/bhp-hr

0.0098 lb CO/bhp-hr 0.0007 lb PM/bhp-hr 4290.00 lb CO2/hr

> N2O same as NOx assumed CH4 same as VOC assumed SOx assumed negligible

**Emergency Hours** 0 Maint./Testing Hours 37.1

Emergency Hours 0 Maint./Testing Hours 16.5

**Emergency Hours** 0 Maint./Testing Hours 41.1

Engine:	#5				#6				#7				#8			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	3,098	38.6	10.0	31	3,068	38.5	10.0	31	3,046	38.0	10.0	30	3,064	38.2	10.0	30
Feb	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
March	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
April	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
June	146	1.3	1.0	1	210	1.7	1.0	1	22	0.3	1.0	0	176	1.4	1.0	1
July	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Aug	-	-	-	-	354	3.1	1.0	-	350	2.3	1.0	-	328	2.1	1.0	-
Sept	-	-	-	-	-	-	-	-	249	1.6	1.0	-	245	1.5	1.0	-
Oct	216	1.5	1.0	3	217	1.5	1.0	3	214	1.5	1.0	3	216	1.5	1.0	3
Nov	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	3460	41.4	12	34	3849	44.8	13	34	3882	43.7	14	33	4029	44.7	14	34
Total(OS)	146	1.3	1	1	564	4.8	2	1	621	4.2	3	0	749	5.0	3	1
	Emergen	cy Hours	0	·	Emergen	cy Hours	0		Emergen	cy Hours	0		Emerger	ncy Hours	0	

Maint./Testing Hours 41.4 Maint./Testing Hours 44.8 Maint./Testing Hours 43.7

Maint./Testing Hours 44.7

Page 143 of 169

# Emissions Calculations - Bldg 9250 Generator Yard

14 Engines (Registration 9-1155)

NOx Emissions		
Uncontrolled NOx (tpy):	(Hours of Engine Operation) * (NOx Emission Factor) / (2,000 pounds per ton)	
		tons per year
Controlled NOx (tpy):	(Hours of Engine Operation) * (NOx Emission Factor) / (2,000 pounds per ton)	
		tons per year
Uncontrolled NOx (ppd):	(Hours of Engine Operation) * (NOx Emission Factor)	
0		pounds per day
Controlled NOx (ppd):	(Hours of Engine Operation) * (NOx Emission Factor)	
Unacatralliad NOV (TOSD)	10.4 hr/day* 4.0 lb NOx/hr = 41.65 (Hours of Engine Operation) * (NOx Emission Factor)	pounds per day
Uncontrolled NOX (103D).		pounds per day
Controllled NOx (TOSD):	(Hours of Engine Operation) * (NOx Emission Factor)	pourius per day
Controlled NOX (103D).		pounds per day
VOC Emissions	10.0 III/day 4.0 Ib NOX/III - 12.00	pourius per day
VOC (tpy):	(Hours of Engine Operation) * (Capacity of Engine) * (VOC Emission Factor) / (2,000 pounds	s per ton)
(tpy).		tons per year
VOC (ppd):	(Hours of Engine Operation) * (Capacity of Engine) * (VOC Emission Factor)	torio por your
(PP 4).		pounds per day
VOC (TOSD):	(Hours of Engine Operation) * (Capacity of Engine) * (VOC Emission Factor)	p,
,		pounds per day
CO Emissions		
CO (tpy):	(Hours of Engine Operation) * (Capacity of Engine) * (CO Emission Factor) / (2,000 pounds	per ton)
		tons per year
CO (ppd):	(Hours of Engine Operation) * (Capacity of Engine) * (CO Emission Factor)	
	13.9 hr/day * 4002 bhp * 0.0014 lb CO/bhp-hr = 77.41	pounds per day
PM(Total) Emissions		
PM(Total) (tpy):	(Hours of Engine Operation) * (Capacity of Engine) * (PM Emission Factor) / (2,000 pounds	
DIACT ( D ( D		tons per year
PM(Total) (ppd):	(Hours of Engine Operation) * (Capacity of Engine) * (PM Emission Factor)	
CO2 Emissions	13.9 hr/day * 4002 bhp * 0.0005 lb PM/bhp-hr = 29.49	pounds per day
CO2 (true)	(House of Engine Operation) * (CO2 Emission Factor) / (2,000 nounds nor ton)	
CO2 (tpy):	(Hours of Engine Operation) * (CO2 Emission Factor) / (2,000 pounds per ton) 53.5 hr/yr * 4290 lb CO2/hr / 2000 lb/ton = 114.76	tons per year
CO2 (ppd):	(Hours of Engine Operation) * (CO2 Emission Factor)	toris per year
CO2 (ppu).		pounds per day
N2O Emissions	10.0 m/yi 4200 ib 002/iii - 003,740.00	pourius per day
N2O (tpy):	(Hours of Engine Operation) * (Capacity of Engine) * (N2O Emission Factor) / (2,000 pounds	per ton)
0 (47).		tons per year
N2O (ppd):	(Hours of Engine Operation) * (Capacity of Engine) * (N2O Emission Factor)	' '
\1 1 /		pounds per day
CH4 Emissions		
CH4 (tpy):	(Hours of Engine Operation) * (Capacity of Engine) * (CH4 Emission Factor) / (2,000 pounds	per ton)
		tons per year
CH4 (ppd):	(Hours of Engine Operation) * (Capacity of Engine) * (CH4 Emission Factor)	
	13.9 hr/day * 4002 bhp * 0.00190 lb CH4/bhp-hr = 0.05	pounds per day

Engine:	#16				#17				#18							
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea				
2022	(gallons)	(hours)		(gallons)	(gallons)	(hours)		(gallons)	(gallons)	(hours)		(gallons)				
Jan	-	-	-	-	-	-	-	-	-	-	-	-	Note: NOx em	nissions rate	based up	on stack test o
Feb	_	-		_	-	-			_			-	All others base	ed on manu	facturer's t	testing data.
March	_	-	-	-	-	-	2.0	2.0	-	-			4.0 II	b NOx/hr co	ontrolled	· ·
April	-	-	-	-	-	-		2.0	-	-			65.4 II	b NOx/hr u	ncontrolle	d
May	_	-	-	-	-	-		2.0	-	-			0.0019 II	b VOC/bhp-l	hr	
June	125	1.2	1.0	0	114	1.1	1.0	0	156	1.5	1.0	0	0.0098 II	b CO/bhp-hr		
July	_	-	-	-	-	-	2.0	2.0	-	-			0.0007 II	b PM/bhp-hr		
Aug	426	4.1	1.0	1	437	4.2	1.0	1	468	4.5	1.0	1	4290.00 II	b CO2/hr		
Sept	-	-	-	-	52	0.5	1.0	0	218	2.1	1.0	1	١	N2O same a	s NOx ass	sumed
Oct	156	1.5	1.0	1	156	1.5	1.0	1	156	1.5	1.0	1		CH4 same a	s VOC ass	sumed
Nov	-	-	-	-	-	-	-	-	-	-	-	-	5	Ox assume	d negligib	le
Dec	-	-	-	-	-	-	-	-	-	-	-	-				
Total(yr)	707	6.8	3	2	759	7.3	4	2	998	9.6	4	3				
Total(OS)	551	5.3	2	1	603	5.8	3	1	842	8.1	3	1				
	Emerger	ncy Hours	0		Emerger	ncy Hours	0		Emerger	ncy Hours	0					
	Maint./Test		6.8		Maint./Testi	ing Hours	7.3		Maint./Test	ing Hours	9.6					
	#19				#20				#21				#22			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
MONTH 2022		Time (hours)	Runs (days)	Urea (gallons)		Time (hours)	Runs (days)	Urea (gallons)		Time (hours)		Urea (gallons)		Time (hours)	Runs (days)	Urea (gallons)
MONTH 2022 Jan	Diesel Fuel				Diesel Fuel				Diesel Fuel				Diesel Fuel			
MONTH 2022 Jan Feb	Diesel Fuel				Diesel Fuel			(gallons)	Diesel Fuel				Diesel Fuel			
MONTH 2022 Jan Feb March	Diesel Fuel				Diesel Fuel			(gallons)	Diesel Fuel				Diesel Fuel			
MONTH 2022 Jan Feb March April	Diesel Fuel				Diesel Fuel			(gallons)	Diesel Fuel				Diesel Fuel			
MONTH 2022 Jan Feb March April May	Diesel Fuel (gallons) - - - -	(hours)	(days)	(gallons)	Diesel Fuel (gallons) - - - -	(hours)	(days)	(gallons)	Diesel Fuel (gallons)	(hours)	(days)	(gallons)	Diesel Fuel (gallons)	(hours)	(days) - - - - -	(gallons)
MONTH 2022 Jan Feb March April May June	Diesel Fuel				Diesel Fuel			(gallons)	Diesel Fuel				Diesel Fuel			
MONTH 2022 Jan Feb March April May June July	Diesel Fuel (gallons)  114	(hours) 1.1	(days) 1.0	(gallons)	Diesel Fuel (gallons)  114	(hours) 1.1	(days) 1.0	(gallons) 0 -	Diesel Fuel (gallons)  94	(hours) 0.9	(days) 1.0	(gallons) 0 - 0	Diesel Fuel (gallons)  94	(hours) 0.9	(days) 1.0	(gallons) 0
MONTH 2022 Jan Feb March April May June July Aug	Diesel Fuel (gallons) 114 - 364	(hours) 1.1 - 3.5	(days) 1.0 - 1.0	(gallons)	Diesel Fuel (gallons)  114 - 354	(hours) 1.1 - 3.4	(days)	(gallons)	Diesel Fuel (gallons)  94 - 364	(hours)	(days) 1.0 1.0	(gallons) 0 - 1	Diesel Fuel (gallons) 94 - 416	(hours) 0.9 - 4.0	(days) 1.0 - 1.0	(gallons)
MONTH 2022 Jan Feb March April May June July Aug Sept	Diesel Fuel (gallons)  114 - 364 135	(hours)	(days) 1.0 1.0 1.0	(gallons)	Diesel Fuel (gallons)  114 - 354 156	(hours)	(days)	(gallons) 0 -	Diesel Fuel (gallons)  94 - 364 156	(hours) 0.9 - 3.5 1.5	(days) 1.0 - 1.0 1.0	(gallons) 0 - 0	Diesel Fuel (gallons)  94 - 416 114	(hours) 0.9 - 4.0 1.1	(days) 1.0 - 1.0 1.0	(gallons) 0
Engine: MONTH 2022 Jan Feb March April May June July Aug Sept Oct	Diesel Fuel (gallons) 114 - 364	(hours) 1.1 - 3.5	(days) 1.0 - 1.0	(gallons)	Diesel Fuel (gallons)  114 - 354	(hours) 1.1 - 3.4	(days)	(gallons)	Diesel Fuel (gallons)  94 - 364	(hours)	(days) 1.0 1.0	(gallons) 0 - 1	Diesel Fuel (gallons) 94 - 416	(hours) 0.9 - 4.0	(days) 1.0 - 1.0	(gallons)
MONTH 2022 Jan Feb March April May June July Aug Sept Oct Nov	Diesel Fuel (gallons)  114 - 364 135	(hours)	(days) 1.0 1.0 1.0	(gallons)	Diesel Fuel (gallons)  114 - 354 156	(hours)	(days)	(gallons)	Diesel Fuel (gallons)  94 - 364 156	(hours) 0.9 - 3.5 1.5	(days) 1.0 - 1.0 1.0	(gallons) 0 - 1	Diesel Fuel (gallons)  94 - 416 114	(hours) 0.9 - 4.0 1.1	(days) 1.0 - 1.0 1.0	(gallons)
MONTH 2022 Jan Feb March April May June July Aug Sept Oct Nov Dec	Diesel Fuel (gallons)  114 - 364 135 156	(hours) 1.1 - 3.5 1.3 1.5 -	(days) 1.0 1.0 1.0	(gallons)	Diesel Fuel (gallons)  114 - 354 156	(hours) 1.1 - 3.4 1.5 1.5 -	(days)	(gallons)	Diesel Fuel (gallons)  94 - 364 156	(hours)  0.9 - 3.5 1.5	(days) 1.0 - 1.0 1.0	(gallons) 0 - 1	Diesel Fuel (gallons)  94 - 416 114 156	(hours) 0.9 - 4.0 1.1 1.5 -	(days) 1.0 - 1.0 1.0	(gallons)
MONTH 2022 Jan Feb March April May June July Aug Sept Oct Nov Dec	Diesel Fuel (gallons)	(hours) 1.1 - 3.5 1.3 1.5 7.4	(days)	(gallons)	Diesel Fuel (gallons)	(hours) 1.1 - 3.4 1.5 1.5 7.5	(days)	(gallons)	Diesel Fuel (gallons)	(hours)	(days)	(gallons) 0 - 1	Diesel Fuel (gallons)	(hours) 0.9 - 4.0 1.1 1.5 7.5	(days)	(gallons)
MONTH 2022 Jan Feb March April May June July Aug Sept Oct Nov	Diesel Fuel (gallons)	(hours) 1.1 - 3.5 1.3 1.5 -	(days) 1.0 1.0 1.0	(gallons)	Diesel Fuel (gallons)	(hours) 1.1 - 3.4 1.5 1.5 -	(days) 1.0 - 1.0 1.0	(gallons)	Diesel Fuel (gallons)	(hours)  0.9 - 3.5 1.5	(days) 1.0 1.0 1.0	(gallons) 0 - 1	Diesel Fuel (gallons)	(hours) 0.9 - 4.0 1.1 1.5 -	(days) 1.0 - 1.0 1.0	(gallons)

Maint./Testing Hours

7.4

Maint./Testing Hours

7.5

Maint./Testing Hours

7.5

Maint./Testing Hours

7.4

Engine:	#23				#24				#25				#26			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Feb	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
March	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
April	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
June	135	1.3	1.0	0	135	1.3	1.0	0	156	1.5	1.0	0	114	1.1	1.0	0
July	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Aug	426	4.1	1.0	1	406	3.9	1.0	1	426	4.1	1.0	1	343	3.3	1.0	1
Sept	62	0.6	1.0	0	83	0.8	1.0	0	42	0.4	1.0	0	166	1.6	1.0	0
Oct	156	1.3	1.0	2	156	1.5	1.0	1	156	1.5	1.0	1	166	1.6	1.0	1
Nov	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	780	7.3	4	3	780	7.5	4	2	780	7.5	4	2	790	7.6	4	2
Total(OS)	624	6.0	3	1	624	6.0	3	1	624	6.0	3	1	624	6.0	3	1
	Emergen	cy Hours	0		Emerger	ncy Hours	0		Emerger	ncy Hours	0		Emerge	ncy Hours	0	
	Maint./Testi	ng Hours	7.3		Maint./Test	ing Hours	7.5		Maint./Test	ing Hours	7.5		Maint./Test	ting Hours	7.6	

Engine:	#27				#28				#4			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	-	-	-	-	-	-	-	-	3,855	48.1	10.0	38
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	-	-	-	-	-	-	-	-	-	-	-	-
April	-	-		-	-	-	-	-	-	-		-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	114	1.1	1.0	0	94	0.9	1.0	0	93	8.0	1.0	1
July	-	-		-	-	-	-	-	-	-		-
Aug	426	4.1	1.0	1	343	3.3	1.0	1	293	1.9	1.0	-
Sept	73	0.7	1.0	0	187	1.8	1.0	0	-	-	-	-
Oct	156	1.5	1.0	1	156	1.5	1.0	1	215	1.5	1.0	3
Nov	-	-	-		-	-	-	-	-	-	-	-
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	770	7.4	4	2	780	7.5	4	2	4455	52.3	13	41
Total(OS)	614	5.9	3	1	624	6.0	3	1	385	2.7	2	1
	Emerger	ncy Hours	0		Emerger	ncy Hours	0		Emerger	ncy Hours	0	
	Maint./Test	ing Hours	7.4		Maint./Test	ing Hours	7.5		Maint./Test	ina Hours	52.3	

# Emissions Calculations - Bldg 9250 Generator Yard (2)

6 Engines (Registration 9-1116)

NOx Emissions			
Uncontrolled NOx (tpy):	(Hours of Engine Operation) * (NOx Emission Factor) / (2,000 pounds per ton)		
		1.31	tons per year
Controlled NOx (tpy):	(Hours of Engine Operation) * (NOx Emission Factor) / (2,000 pounds per ton)		
		0.33	tons per year
Uncontrolled NOx (ppd):	(Hours of Engine Operation) * (NOx Emission Factor)		
		1.37	pounds per day
Controlled NOx (ppd):	(Hours of Engine Operation) * (NOx Emission Factor)		
(7005)		1.18	pounds per day
Uncontrolled NOx (TOSD):	: (Hours of Engine Operation) * (NOx Emission Factor)	0.04	
O - 1-1-1-11 - 1 NO. (TOOD)		2.64	pounds per day
Controllled NOx (TOSD):	(Hours of Engine Operation) * (NOx Emission Factor)  18.0 hr/day *  4.0 lb NOx/hr =  7.	2 00	naunda nar dav
VOC Emissions	18.0 hr/day * 4.0 lb NOx/hr = 7:	2.00	pounds per day
VOC (tpy):	(Hours of Engine Operation) * (Capacity of Engine) * (VOC Emission Factor) / (2,000 pc	sunde	norton)
VOC (tpy).			tons per year
VOC (ppd):	(Hours of Engine Operation) * (Capacity of Engine) * (VOC Emission Factor)	5.76	toris per year
VOO (рра).		3 70	pounds per day
VOC (TOSD):	(Hours of Engine Operation) * (Capacity of Engine) * (VOC Emission Factor)	5.70	pourius per day
(100).		2.10	pounds per day
CO Emissions	- · · · · · · · · · · · · · · · · · · ·		,
CO (tpy):	(Hours of Engine Operation) * (Capacity of Engine) * (CO Emission Factor) / (2,000 pour	ınds ı	per ton)
(13)			tons per year
CO (ppd):	(Hours of Engine Operation) * (Capacity of Engine) * (CO Emission Factor)		
	53.2 hr/day * 4002 bhp * 0.0014 lb CO/bhp-hr = 29	5.74	pounds per day
PM(Total) Emissions			
PM(Total) (tpy):	(Hours of Engine Operation) * (Capacity of Engine) * (PM Emission Factor) / (2,000 pour		
		0.27	tons per year
PM(Total) (ppd):	(Hours of Engine Operation) * (Capacity of Engine) * (PM Emission Factor)		
	53.2 hr/day * 4002 bhp * 0.0005 lb PM/bhp-hr = 11	2.66	pounds per day
CO2 Emissions	(1) (5) (6) (1) (4) (6) (6) (7) (7) (8) (8)		
CO2 (tpy):	(Hours of Engine Operation) * (CO2 Emission Factor) / (2,000 pounds per ton)	0 4 4	
CO2 (== d):		5.44	tons per year
CO2 (ppd):	(Hours of Engine Operation) * (CO2 Emission Factor) 53.2 hr/yr * 4290 lb CO2/hr = 228,25	4.06	pounds per day
N2O Emissions	55.2 HI/yi 4290 ID GOZ/III - 226,250	+.00	pourius per day
N2O (tpy):	(Hours of Engine Operation) * (Capacity of Engine) * (N2O Emission Factor) / (2,000 pc	nunde	ner ton)
1420 (tpy).			tons per year
N2O (ppd):	(Hours of Engine Operation) * (Capacity of Engine) * (N2O Emission Factor)		torio por your
( ( ( ) ) .		1.74	pounds per day
CH4 Emissions	, , , , , , , , , , , , , , , , , , ,		, ,
CH4 (tpy):	(Hours of Engine Operation) * (Capacity of Engine) * (CH4 Emission Factor) / (2,000 po	unds	per ton)
			tons per year
CH4 (ppd):	(Hours of Engine Operation) * (Capacity of Engine) * (CH4 Emission Factor)		-
	53.2 hr/day * 4002 bhp * 0.00190 lb CH4/bhp-hr =	0.20	pounds per day

Engine:	#9				#10				#11			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	4,087	39.3	10.0	34	3,879	37.3	10.0	32	1,903	18.3	10.0	16
Feb	-	-	-	-	-	-	-	-	-	-	-	
March	-	-	-	-	-	-	-	-	-	-	-	
April	-	-	-	-	-	-	-	-	-	-	-	
May	-	-	-	-	-	-	-	-	-	-	-	
June	125	1.2	1.0	0	198	1.9	1.0	0	125	1.2	1.0	0
July	-	-	-	-	-	-	-	-	-	-	-	
Aug	426	4.1	1.0	1	416	4.0	1.0	1	406	3.9	1.0	1
Sept	-	-	-	-	-	-	-	-	21	0.2	1.0	1
Oct	156	1.5	1.0	1	156	1.5	11.0	1	156	1.5	1.0	1
Nov	-	-	-	-	-	-	-	-	-	-	-	
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	4794	46.1	13	36	4649	44.7	23	34	2610	25.1	14	18
Total(OS)	551	5.3	2	1	614	5.9	2	1	551	5.3	3	1

Emergency Hours 0 Emergency Hours 0 Maint./Testing Hours 46.1

**Emergency Hours** 0 Maint./Testing Hours 44.7 Maint./Testing Hours 25.1

Engine:	#12				#13				#14			
MONTH	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea	Diesel Fuel	Time	Runs	Urea
2022	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)	(gallons)	(hours)	(days)	(gallons)
Jan	3,484	33.5	10.0	29	3,692	35.5	10.0	30	-	-	-	-
Feb	-	-	-	-	-	-	-	-	-	-	-	-
March	-	-	-	-	-	-	-	-	-	-	-	-
April	-	-	-	-	-	-	-	-	-	-	-	-
May	-	-	-	-	-	-	-	-	-	-	-	-
June	94	0.9	1.0	0	104	1.0	1.0	0	-	-	-	
July	-	-	-	-	-	-	-	-	-	-	-	
Aug	416	4.0	1.0	1	395	3.8	1.0	1	406	3.9	1.0	1
Sept	42	0.4	1.0	0	-	-	-	-	104	1.0	1.0	0
Oct	156	1.5	1.0	1	156	1.5	1.0	1	156	1.5	1.0	1
Nov	-	-	-	-	-	-	-	-	-	-	-	
Dec	-	-	-	-	-	-	-	-	-	-	-	-
Total(yr)	4191	40.3	14	31	4347	41.8	13	32	666	6.4	3	2
Total(OS)	551	5.3	3	1	499	4.8	2	1	510	4.9	2	1
	Emerger	ncy Hours	0		Emerger	ncy Hours	0		Emerger	ncy Hours	0	

Emergency Hours Maint./Testing Hours 40.3 Maint./Testing Hours 41.8 Maint./Testing Hours 6.4 Note: NOx emissions rate based upon stack test data. All others based on manufacturer's testing data.

4.0 lb NOx/hr controlled 65.4 lb NOx/hr uncontrolled

93.5%

0.0019 lb VOC/bhp-hr 0.0098 lb CO/bhp-hr

0.0007 lb PM/bhp-hr 4290.00 lb CO2/hr

N2O same as NOx assumed CH4 same as VOC assumed SOx assumed negligible

### **Emissions Calculations - Bldg 9250 Generator Yard (#15)**

1 Engines (Registration 9-1136)

**NOx Emissions** 

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

7 hr/yr \* 2.42 lb NOx/hr / 2000 lb/ton = 0.01 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

3.2 hr/day \* 2.42 lb NOx/hr = 7.77 pounds per day

NOx (TOSD): (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

5.9 hr/OSday \* 2.42 lb NOx/hr = 14.31 pounds per day

**VOC Emissions** 

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

7 hr/yr \* 0.18 lb VOC/hr / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Hours of Engine Operation) \* (VOC Emission Factor)

3.2 hr/day \* 0.18 lb VOC/hr = 0.58 pounds per day

VOC (TOSD): (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

5.9 hr/OSday \* 0.18 lb VOC/hr = 1.06 pounds per day

**CO Emissions** 

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

7 hr/yr \* 1.49 lb CO/hr / 2000 lb/ton = 0.01 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

3.2 hr/day \* 1.49 lb CO/hr = 4.78 pounds per day

PM(Total) Emissions

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

7 hr/yr \* 0.09 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

3.2 hr/day \* 0.09 lb PM/hr = 0.29 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Hours of Engine Operation) \* (CO2 Emission Factor) / (2,000 pounds per ton)

7 hr/yr \* 273 lb CO2/hr / 2000 lb/ton = 0.96 tons per year

CO2 (ppd): (Hours of Engine Operation) \* (CO2 Emission Factor)

3.2 hr/day \* 273 lb CO2/hr = 876.61 pounds per day

# Emission Data - 9250 Generator Yard (#15)

(Registration #9-1136)

Engine: Reg. #: KW (Out):	#15 9-1136 3000							
MONTH 2022	Diesel Fuel (gallons)	Time (hours)	Runs (days)	Urea (gallons)				
Jan Feb	-	-						
March April	-	-		-				
May June	- 62	- 1	1	- 0				
July Aug	- 510	- 5	1	- 1				
Sept Oct	- 156	2	1	1				
Nov Dec								
Total(yr) Total(OS)	728 572	7.0 5.5	3.0 2.0	2.2 0.9				

Emergency Hours
Maint./Testing Hours

# \*Generators began operation in June 2022

Note: All emission factors are based on manufacturer's testing data.

2.42 lb NOx/hr

0.18 lb VOC/hr

1.49 lb CO/hr

0.09 lb PM/hr

273 lb CO2/hr

N2O same as NOx assumed

CH4 same as VOC assumed

SOx assumed negligible

### Emissions Calculations - Bldgs 9250 Life Safety Generator

1 Engine (Registration 9-1156)

NOx Emissions			
NOx (tpy): (Hours of Engine Operation) * (NOx Emission Factor) / (2,000 pounds per ton)			
NO. (mad) (Harma of Familia On anation) * (NO. Familia Factor)	5 hr/yr *	2.42 lb NOx/hr / 2000 lb/ton =	0.01 tons per year
NOx (ppd): (Hours of Engine Operation) * (NOx Emission Factor)	1.7 hr/day *	2.42 lb NOx/hr =	4.19 pounds per day
NOx (TOSI (Hours of Engine Operation in OSDay) * (NOx Emission Factor)	1.7 III/day	2.42 15 1107/111 -	4.19 poullus pel day
(Nox Emission action)	0.0 hr/OSday *	2.42 lb NOx/hr =	0.00 pounds per day
VOC Emissions	,		, ,
VOC (tpy): (Hours of Engine Operation) * (VOC Emission Factor) / (2,000 pounds per ton)			
	5 hr/yr *	0.18 lb VOC/hr / 2000 lb/ton =	0.00 tons per year
VOC (ppd) (Hours of Engine Operation) * (VOC Emission Factor)			
VOC /TOC /Lours of Familia Operation in OCDs://* (VOC Finite ion Factor)	1.7 hr/day *	0.18 lb VOC/hr =	0.31 pounds per day
VOC (TOS (Hours of Engine Operation in OSDay) * (VOC Emission Factor)	0.0 hr/OSday *	0.18 lb VOC/hr =	0.00 pounds per day
CO Emissions	0.0 III/OOday	0.10 lb VOC/III =	0.00 pourids per day
CO (tpy): (Hours of Engine Operation) * (CO Emission Factor) / (2,000 pounds per ton)			
	5 hr/yr *	1.49 lb CO/hr / 2000 lb/ton =	0.00 tons per year
CO (ppd): (Hours of Engine Operation) * (CO Emission Factor)			
	1.7 hr/day *	1.49 lb CO/hr =	2.58 pounds per day
PM(Total) Emissions			
PM (tpy): (Hours of Engine Operation) * (PM Emission Factor) / (2,000 pounds per ton)	5 hr/yr *	0.09 lb PM/hr / 2000 lb/ton =	0.00 tons per year
PM (ppd): (Hours of Engine Operation) * (PM Emission Factor)	3 III/yi	0.09 ID F W//III / 2000 ID/(011 =	0.00 tons per year
Tim (ppa). (Tours of Engine operation) (Tim Enmodern actor)	1.7 hr/day *	0.09 lb PM/hr =	0.16 pounds per day
CO2 Emissions	,		, , ,
CO2 (tpy): (Hours of Engine Operation) * (CO2 Emission Factor) / (2,000 pounds per ton)			
	5 hr/yr *	273 lb CO2/hr / 2000 lb/ton =	0.71 tons per year
CO2 (ppd): (Hours of Engine Operation) * (CO2 Emission Factor)	471/1 *	070 !! 000!!	470.00
	1.7 hr/day *	273 lb CO2/hr =	473.20 pounds per day

1 Engine (Registration #9-1156)

	#1 9-1156 850	
Diesel Fuel	Time	Runs
(gallons)	(nours)	(days)
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
268	2.2	1
220	1.8	1
146	1.2	1
634	5.2	3
0	0.0	0
	(gallons) 268 220 146 634 0	850  Diesel Fuel (gallons)

Emergency Hours 0
Maint./Testing Hours 5

# \*Generators began operation in October 2022

Note: All emission factors are based on manufacturer's testing data.

2.42 lb NOx/hr

0.18 lb VOC/hr

1.49 lb CO/hr

0.09 lb PM/hr

273 lb CO2/hr

N2O same as NOx assumed

CH4 same as VOC assumed

SOx assumed negligible

### **Emissions Calculations - Bldgs 9000 Life Safety Generator**

1 Engine (Registration 9-1092)

**NOx Emissions** 

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

22 hr/yr \* 2.42 lb NOx/hr / 2000 lb/ton = 0.03 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

3.1 hr/day \* 2.42 lb NOx/hr = 7.50 pounds per day

NOx (TOSD): (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

4.7 hr/OSday \* 2.42 lb NOx/hr = 11.43 pounds per day

**VOC Emissions** 

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

22 hr/yr \* 0.18 lb VOC/hr / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Hours of Engine Operation) \* (VOC Emission Factor)

3.1 hr/day \* 0.18 lb VOC/hr = 0.56 pounds per day

VOC (TOSD): (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

4.7 hr/OSday \* 0.18 lb VOC/hr = 0.85 pounds per day

**CO Emissions** 

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

22 hr/yr \* 1.49 lb CO/hr / 2000 lb/ton = 0.02 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

3.1 hr/day \* 1.49 lb CO/hr = 4.62 pounds per day

**PM(Total) Emissions** 

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

22 hr/yr \* 0.09 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

3.1 hr/day \* 0.09 lb PM/hr = 0.28 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Hours of Engine Operation) \* (CO2 Emission Factor) / (2,000 pounds per ton)

22 hr/yr \* 273 lb CO2/hr / 2000 lb/ton = 2.96 tons per year

CO2 (ppd): (Hours of Engine Operation) \* (CO2 Emission Factor)

3.1 hr/day \* 273 lb CO2/hr = 846.30 pounds per day

# **Emission Data - 9000 Life Safety Generator**

1 Engine (Registration #9-1092)

Engine:	#1						
Reg. #:	9-1092						
KW (Out):	1000						
MONTH	Diesel Fuel	Time	Runs				
2022	(gallons)	(hours)	(days)				
Jan	0	1	-				
Feb	19		1				
March April	0 0	- 1	-				
May	69	2	1				
June	42	1	1				
July Aug	0 577	15	1				
Sept Oct	34 50	1	1				
Nov	0	-	-				
Dec	38	1.0	1				
Total(yr)	829	21.7	7				
Total(OS)	722	18.9	4				

Emergency Hours 0 Maint./Testing Hours 22

Note: All emission factors are based on manufacturer's testing data.

2.42 lb NOx/hr

0.18 lb VOC/hr

1.49 lb CO/hr

0.09 lb PM/hr

273 lb CO2/hr

N2O same as NOx assumed

CH4 same as VOC assumed

SOx assumed negligible

### Emissions Calculations - Bldgs 9220 and 9230 Life Safety Generator

2 Engines (Registration 9-1117)

**NOx Emissions** 

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

27 hr/yr \* 9.08 lb NOx/hr / 2000 lb/ton = 0.12 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

4.5 hr/day \* 9.08 lb NOx/hr = 41.01 pounds per day

NOx (TOSI (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

5.5 hr/OSday \* 9.08 lb NOx/hr = 50.39 pounds per day

**VOC Emissions** 

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

27 hr/yr \* 0.02 lb VOC/hr / 2000 lb/ton = 0.00 tons per year

VOC (ppd) (Hours of Engine Operation) \* (VOC Emission Factor)

4.5 hr/day \* 0.02 lb VOC/hr = 0.09 pounds per day

VOC (TOS (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

5.5 hr/OSday \* 0.02 lb VOC/hr = 0.11 pounds per day

**CO Emissions** 

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

27 hr/yr \* 0.67 lb CO/hr / 2000 lb/ton = 0.01 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

4.5 hr/day \* 0.67 lb CO/hr = 3.03 pounds per day

PM(Total) Emissions

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

27 hr/yr \* 0.04 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

4.5 hr/day \* 0.04 lb PM/hr = 0.18 pounds per day

**CO2 Emissions** 

CO2 (tpy): (Hours of Engine Operation) \* (CO2 Emission Factor) / (2,000 pounds per ton)

27 hr/yr \* 486 lb CO2/hr / 2000 lb/ton = 6.59 tons per year

CO2 (ppd): (Hours of Engine Operation) \* (CO2 Emission Factor)

4.5 hr/day \* 486 lb CO2/hr = 2195.10 pounds per day

1 Engines (Registration #9-1146)

Engine:		#1		Engine:		#2	
Reg. #:		9-1117		Reg. #:		9-1117	
KW (Out):		500		KW (Out):		500	
MONTH	Diesel Fuel	Time	Runs	MONTH	Diesel Fuel	Time	Runs
2022	(gallons)	(hours)	(days)	0	(gallons)	(hours)	(days)
Jan	9	0	1	Jan	0	-	0
Feb	0	-	-	Feb	0	-	0
March	0	-	-	March	0	-	0
April	0	-	-	April	0	-	0
May	0	-	-	May	0	-	0
June	9	9	2	June	22	1	1
July	1	1	1	July	22	1	1
Aug	0	-	-	Aug	43	2	1
Sept	6	6	1	Sept	45	2	1
Oct	0	-	-	Oct	32	2	1
Nov	2	2	1	Nov	24	1	1
Dec	0	-	-	Dec	0	-	0
Total(yr)	27	18.4	6	Total(yr)	188	8.7	6
Total(OS)	16	16.1	4	Total(OS)	132	6.1	4
	Emerge	ency Hours	0		Emerge	ncy Hours	0
	Maint./Tes	sting Hours	18		Maint./Test	ting Hours	9

Note: All emission factors are based on manufacturer's testing data.

9.08 lb NOx/hr

0.02 lb VOC/hr

0.67 lb CO/hr

0.04 lb PM/hr

486 lb CO2/hr 40CFR98 Table C-2

N2O same as NOx assumed

CH4 same as VOC assumed

SOx assumed negligible

1 Engines (Registration #9-1146)

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

29 hr/yr \* 6.02 lb NOx/hr / 2000 lb/ton = 0.09 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

4.1 hr/day \* 6.02 lb NOx/hr = 24.68 pounds per day

NOx (TOSI (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

6.2 hr/OSday \* 6.02 lb NOx/hr = 37.47 pounds per day

### **VOC Emissions**

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

29 hr/yr \* 0.01 lb VOC/hr / 2000 lb/ton = 0.00 tons per year

VOC (ppd) (Hours of Engine Operation) \* (VOC Emission Factor)

4.1 hr/day \* 0.01 lb VOC/hr = 0.04 pounds per day

VOC (TOS (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

6.2 hr/OSday \* 0.01 lb VOC/hr = 0.06 pounds per day

### **CO Emissions**

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

29 hr/yr \* 1.61 lb CO/hr / 2000 lb/ton = 0.02 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

4.1 hr/day \* 1.61 lb CO/hr = 6.60 pounds per day

### PM(Total) Emissions

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

29 hr/yr \* 0.07 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

4.1 hr/day \* 0.07 lb PM/hr = 0.29 pounds per day

### **CO2 Emissions**

CO2 (tpy): (Hours of Engine Operation) \* (CO2 Emission Factor) / (2,000 pounds per ton)

29 hr/yr \* 598 lb CO2/hr / 2000 lb/ton = 8.58 tons per year

CO2 (ppd): (Hours of Engine Operation) \* (CO2 Emission Factor)

4.1 hr/day \* 598 lb CO2/hr = 2451.80 pounds per day

1 Engines (Registration #9-1146)

Engine: Reg. #: KW (Out):	#1 9-1137 400						
MONTH 2022	Diesel Fuel (gallons)	Time (hours)	Runs (days)				
Jan	0	-	-				
Feb	0	-	-				
March	0	-	-				
April	0	-	-				
May	0	-	-				
June	259	15	2				
July	0	-	-				
Aug	21	1	1				
Sept	156	9	1				
Oct	26	2	1				
Nov	33	2	1				
Dec	7	0	1				
Total(yr)	502	28.7	7				
Total(OS)	436	24.9	4				

Emergency Hours 0 Maint./Testing Hours 29

Note: All emission factors are based on manufacturer's testing data.

6.02 lb NOx/hr

0.01 lb VOC/hr

1.61 lb CO/hr

0.07 lb PM/hr

598 lb CO2/hr 40CFR98 Table C-2

N2O same as NOx assumed

CH4 same as VOC assumed

SOx assumed negligible

1 Engines (Registration #9-1146)

**NOx Emissions** 

NOx (tpy): (Hours of Engine Operation) \* (NOx Emission Factor) / (2,000 pounds per ton)

8 hr/yr \* 7.32 lb NOx/hr / 2000 lb/ton = 0.03 tons per year

NOx (ppd): (Hours of Engine Operation) \* (NOx Emission Factor)

1.2 hr/day \* 7.32 lb NOx/hr = 8.57 pounds per day

NOx (TOSD): (Hours of Engine Operation in OSDay) \* (NOx Emission Factor)

1.1 hr/OSday \* 7.32 lb NOx/hr = 8.34 pounds per day

**VOC Emissions** 

VOC (tpy): (Hours of Engine Operation) \* (VOC Emission Factor) / (2,000 pounds per ton)

8 hr/yr \* 0.22 lb VOC/hr / 2000 lb/ton = 0.00 tons per year

VOC (ppd): (Hours of Engine Operation) \* (VOC Emission Factor)

1.2 hr/day \* 0.22 lb VOC/hr = 0.26 pounds per day

VOC (TOSD): (Hours of Engine Operation in OSDay) \* (VOC Emission Factor)

1.1 hr/OSday \* 0.22 lb VOC/hr = 0.25 pounds per day

**CO Emissions** 

CO (tpy): (Hours of Engine Operation) \* (CO Emission Factor) / (2,000 pounds per ton)

8 hr/yr \* 0.60 lb CO/hr / 2000 lb/ton = 0.00 tons per year

CO (ppd): (Hours of Engine Operation) \* (CO Emission Factor)

1.2 hr/day \* 0.60 lb CO/hr = 0.70 pounds per day

**PM(Total) Emissions** 

PM (tpy): (Hours of Engine Operation) \* (PM Emission Factor) / (2,000 pounds per ton)

8 hr/yr \* 0.23 lb PM/hr / 2000 lb/ton = 0.00 tons per year

PM (ppd): (Hours of Engine Operation) \* (PM Emission Factor)

1.2 hr/day \* 0.23 lb PM/hr = 0.27 pounds per day

CO2 Emissions

CO2 (tpy): (Hours of Engine Operation) \* (CO2 Emission Factor) / (2,000 pounds per ton)

8 hr/yr \* 428 lb CO2/hr / 2000 lb/ton = 1.75 tons per year

CO2 (ppd): (Hours of Engine Operation) \* (CO2 Emission Factor)

1.2 hr/day \* 428 lb CO2/hr = 501.37 pounds per day

N2O Emissions

CO2 (tpy): (Hours of Engine Operation) \* (N2O Emission Factor) / (2,000 pounds per ton)

8 hr/yr \* 0.003 lb N2O/hr / 2000 lb/ton = 0.00 tons per year

CO2 (ppd): (Hours of Engine Operation) \* (N2O Emission Factor)

1.2 hr/day \* 0.003 lb N2O/hr = 0.00 pounds per day

**CH4 Emissions** 

CO2 (tpy): (Hours of Engine Operation) \* (CH4 Emission Factor) / (2,000 pounds per ton)

8 hr/yr \* 0.017 lb CH4/hr / 2000 lb/ton = 0.00 tons per year

CO2 (ppd): (Hours of Engine Operation) \* (CH4 Emission Factor)

1.2 hr/day \* 0.017 lb CH4/hr = 0.02 pounds per day

1 Engines (Registration #9-1146)

Engine: Reg. #: KW (Out):		#1 9-1146 550	
MONTH 2022	Diesel Fuel (gallons)	Time (hours)	Runs (days)
Jan Feb	0	- [	- 1
March	0	-	-
April May	19 19	1	1
June	36	2	1
July Aug	13 0	1	1 -
Sept	21	1	1
Oct Nov	32 15	2	1
Dec	0	- '	- '
Total(yr) Total(OS)	157 109	8.2 5.7	7 5

Emergency Hours 0
Maint./Testing Hours 8

Note: All emission factors are based on manufacturer's testing data except CO2.

7.32 lb NOx/hr

0.22 lb VOC/hr

0.6 lb CO/hr

0.23 lb PM/hr

428 lb CO2/hr 40CFR98 Table C-2

0.003 lb N2O/hr 40CFR98 Table C-2

0.017 lb CH4/hr 40CFR98 Table C-2

SOx assumed negligible

# **Emission Calculations - Building 9706**

Plating Operations (Registration #6-0375)

There are no criteria pollutants from this source.

No recordkeeping requirements for this source.

Page 161 of 169 Note: Emissions are from mass balance.

# **Emission Calculations - Building 9706**

SPC Paint Spray Booth (Registration #6-1114)

Hours/day	4	
Days/week	2	
Weeks/year	40	
Days/year	80	
	Amount	
Product	used	units
Sealer	3.45	gallons
Base Coat	2.94	gallons
Etch Primer	1.06	gallons
Carc Paint	0.00	gallons
Cromax Clear Coat	5.00	gallons
Adhesion Promoter	0.81	gallons
Fill Primer	1.50	gallons
Williams 36173	5.50	gallons

## **VOC Emissions**

VOO EIIII33I0II3					
Product:	(Gallons of product con-	sumed annually) * (dens	sity[lb/gal]) * (VOC %wt.)		
Sealer	3.45 gal/yr *	4.60 lb/gal *	0.5 VOC %wt.	7.94	pounds VOC per year
Product:	(Gallons of product con	sumed annually) * (dens	sity[lb/gal]) * (VOC %wt.)		
Base Coat	2.94 gal/yr *	6.20 lb/gal *	0.43 VOC %wt.	7.84	pounds VOC per year
Product:	(Gallons of product con	sumed annually) * (dens	sity[lb/gal]) * (VOC %wt.)		
Etch Primer	1.06 gal/yr *	7.05 lb/gal *	0.74 VOC %wt.	5.51	pounds VOC per year
Product:	(Gallons of product con	sumed annually) * (dens	sity[lb/gal]) * (VOC %wt.)		
Carc Paint	0 gal/yr *	5.60 lb/gal *	0.28 VOC %wt.	0.00	pounds VOC per year
Product:	(Gallons of product con	sumed annually) * (dens	sity[lb/gal]) * (VOC %wt.)		
Cromax Clear Coat	5 gal/yr *	2.10 lb/gal *	0.5 VOC %wt.	5.25	pounds VOC per year
Product:	(Gallons of product con	sumed annually) * (dens	sity[lb/gal]) * (VOC %wt.)		
Adhesion Promoter	0.81 gal/yr *	9.17 lb/gal *	0.74 VOC %wt.	5.50	pounds VOC per year
Product:	(Gallons of product con	sumed annually) * (dens	sity[lb/gal]) * (VOC %wt.)		
Fill Primer	1.5 gal/yr *	2.00 lb/gal *	1 VOC %wt.	3.00	pounds VOC per year
Product:	(Gallons of product con-	sumed annually) * (VOC	[lb/gal])		
VOC Emissions	5.50 gal/yr *	1.78 lb/gal		9.79	pounds VOC per year
			Total VOC	44.82	lb/yr
			Total VOC	0.02	tpy
			Total VOC	0.56	ppd
			Total VOC OSD	0.56	ppd

Page 162 of 169

### **Emission Calculations - Building 9700 (SPL)**

Spray Booth (Registration #6-0717)

### Operation

hr/dy	1
dy/wk	2
wk/yr	52
Dy/yr	104

Chemical Use

	Usage	VOC	Waste
PRODUCT	(gal/yr)	(lb/gal)	%
10% IPA Solution	3.0	8.0	0%
Perma 21F Ink	0.0	0.1	0%
Perma 21F Hardener	0.0	0.3	0%
Perma 21F Thinner	0.0	3.0	0%
Sunnyside Thinner	4.0	0.2	0%

**VOC Emissions** Product: 10% IPA Solution (Annual Quantity Used) \* (VOC Content) \* (1-Waste%) 3.0 gal/yr \* 0.8 lb/gal VOC \* 1.00 = 2.40 pounds per year Product: Perma 21F Ink (Annual Quantity Used) \* (VOC Content) \* (1-Waste%) 0.0 gal/yr \* 0.1 lb/gal VOC \* 1.00 = 0.00 pounds per year Product: Perma 21F Hardner (Annual Quantity Used) \* (VOC Content) \* (1-Waste%) 0.0 gal/yr \* 0.3 lb/gal VOC \* 0.00 pounds per year 1.00 = Product: Perma 21F Thinner (Annual Quantity Used) \* (VOC Content) \* (1-Waste%) 0.0 gal/yr \* 3.0 lb/gal VOC \* 0.00 pounds per year 1.00 = Product: NCP Coatings, Inc. Thinner (Annual Quantity Used) \* (VOC Content) \* (1-Waste%) 4.0 gal/yr \* 0.2 lb/gal VOC \* 1.00 = 0.80 pounds per year 3.20 pounds per year Total VOC 0.00 tpy **Total VOC** 0.03 ppd **Total VOC Total OSD VOC** 0.03 ppd

# **Emission Calculations - Building 9700 (SPL)**

Printed Circuit Board Assembly (Registration #6-0720)

Operation				
hr/dy	1			
dy/wk	1			
wk/yr	8			
dy/yr	8			
	Usage		VOC Content	%
Chemical Use	(units/yr)	Units	(lb/unit)	Removal
Flux - 615-25	0.0	gal	5.96	0%
Solder Mask/Cream	0.0	lbs	45.0%	0%
Conap S-8 Solvent	0.0	gal	6.48	0%
BioAct EC-7	0.0	gal	6.62	0%
Solder Paste	0.0	lbs	3.0%	95%
Booster Fluid/Isopropanol	0.0	gal	6.51	95%
Bestine Solvent & Thinner -Dope/Lacquer	0.0	gal	5.79	95%
Safezone Cleaning Solvent & Flux Remover	0.0	gal	0.44	95%
Conformal Coating Stripper	0.0	gal	3.35	95%
VeriClean Solvent MCC-DC1	0.0	gal	0.05	0%
Chipbonder and Heat Cure Adhesive	0.0	lbs	38.9%	95%

### **VOC Emissions**

Product: Flux - 615-25	(Annual quantity consumed) * (VOC Content) * (1-Removal %)					
	0	units/yr *	5.96 lb/unit *	1.00	=	0.00 pounds per year
Product: Solder Mask/Cream		(Annual quar	ntity consumed)	* (VOC Content)	* (1-R	Removal %)
	0	units/yr *	0.45 lb/unit *	1.00	=	0.00 pounds per year
Product: Thinner 438		(Annual quar	ntity consumed)	* (VOC Content)	* (1-R	Removal %)
	0	units/yr *	6.48 lb/unit *	1.00	=	0.00 pounds per year
Product: BioAct EC-7		(Annual quar	ntity consumed)	* (VOC Content)	* (1-R	Removal %)
	0	units/yr *	6.62 lb/unit *	1.00	=	0.00 pounds per year
Product: Solder Paste		(Annual quar	ntity consumed)	* (VOC Content)	* (1-R	Removal %)
	0.0	units/yr *	0.03 lb/unit *	0.05	=	0.00 pounds per year
Product: Booster Fluid/Isopropanol		(Annual quar	ntity consumed)	* (VOC Content)	* (1-R	Removal %)
	0	units/yr *	6.51 lb/unit *	0.05	=	0.00 pounds per year
Product: Bestine Solvent & Thinner-Dope/Lacquer		(Annual quar	ntity consumed)	* (VOC Content)	* (1-R	Removal %)
	0	units/yr *	5.79 lb/unit *	0.05	=	0.00 pounds per year
Product: Safezone Cleaning Solvent & Flux Remove	er/	(Annual quar	ntity consumed)	* (VOC Content)	* (1-R	Removal %)
	0	units/yr *	0.44 lb/unit *	0.05	=	0.00 pounds per year
Product: Conformal Coating Stripper		(Annual quar	ntity consumed)	* (VOC Content)	* (1-R	Removal %)
	0.0	units/yr *	3.35 lb/unit *	0.05	=	0.00 pounds per year

# **Emission Calculations - Building 9700 (SPL)**

Printed Circuit Board Assembly (Registration #6-0720)

Product: VeriClean Solvent MCC-DC1 (Annual quantity consumed) \* (VOC Content) \* (1-Removal %)

0 units/yr \* 0.05 lb/unit \* 1.00 = 0.00 pounds per year

Product: Chipbonder and Heat Cure Adhesive (Annual quantity consumed) \* (VOC Content) \* (1-Removal %)

0 units/yr \* 0.39 lb/unit \* 0.05 = 0.00 pounds per year Total VOC 0.00 pounds per year

Total Stack (95%) VOC 0.00 tpy

Total Fugitive (5%) VOC 0.00 tpy

Total Stack VOC 0.00 ppd
Total Fugitive VOC 0.00 ppd

Total Stack OSD VOC 0.00 ppd

Total Fugitive OSD VOC 0.00 ppd

# **Emission Calculations - Cooper**

Paint Spray Booth (Registration #6-1095)

Hours/day Days/week Weeks/year Days/year	0 0 0 0		*Paint booth not in use in 2022
	Amount		
Product	used	units	
Sanding Sealer	0.00	gallons	
SW Chemical Coatings	0.00	gallons	
Etch Primer	0.00	gallons	
Carc Paint	0.00	gallons	
Gloss Lacquer	0.00	gallons	
Lacquer Thinner	0.00	gallons	

# **VOC Emissions**

Product:	(Gallons of product cons	sumed annually) * (de	ensity[lb/gal]) * (VOC %wt.)		
Sanding Sealer	0 gal/yr *	8.20 lb/gal *	0.5 VOC %wt.	0.00	pounds VOC per year
Product:	(Gallons of product cons	sumed annually) * (de	ensity[lb/gal]) * (VOC %wt.)		
SW Chemical Coatings	0 gal/yr *	6.80 lb/gal *	0.43 VOC %wt.	0.00	pounds VOC per year
Product:	(Gallons of product cons	sumed annually) * (de	ensity[lb/gal]) * (VOC %wt.)		
Etch Primer	0 gal/yr *	7.05 lb/gal *	0.74 VOC %wt.	0.00	pounds VOC per year
Product:	(Gallons of product cons	sumed annually) * (de	ensity[lb/gal]) * (VOC %wt.)		
Carc Paint	0 gal/yr *	6.80 lb/gal *	0.28 VOC %wt.	0.00	pounds VOC per year
Product:	(Gallons of product cons	sumed annually) * (de	ensity[lb/gal]) * (VOC %wt.)		
Gloss Lacquer	0 gal/yr *	8.40 lb/gal *	0.5 VOC %wt.	0.00	pounds VOC per year
Product:	(Gallons of product cons	sumed annually) * (de	ensity[lb/gal]) * (VOC %wt.)		
Lacquer Thinner	0 gal/yr *	8.00 lb/gal *	1 VOC %wt	0.00	pounds VOC per year
			Total VOC	0.00	lb/yr
			Total VOC	0.00	tpy
			Total VOC	0.00	ppd
			Total VOC OSD	0.00	ppd

Page 166 of 169 Note: Emissions are from mass balance.

# **Emission Calculations - Building 9814A**

Paper Recycling Baghouse #1 (Registration #9-0449)

Operation:	
Feed Rate (lbs/hour)	63.5
hours/day	6
hours/year	1506
day/week	5
weeks/year	36
days/year	251
Removal Efficiency	99.3%

### **PM Emissions**

(Hourly Feed Rate) \* (Daily Operating Hours) \* (1 - Removal Efficiency)
63.5 lb/hr \* 6 hr/day \* 0.007 = 2.67 pounds per day
Total PM 0.33 tpy

Page 167 of 169

Note: Emissions are from mass balance.

# **Emission Calculations - Building 9814A**

Paper Recycling Baghouse #2 (Registration #9-0450)

Operation:	
Feed Rate (lbs/hour)	63.5
hours/day	6
hours/year	1506
day/week	5
weeks/year	50
days/year	251
Removal Efficiency	99.1%

### **PM Emissions**

(Hourly Feed Rate) \* (Daily Operating Hours) \* (1 - Removal Efficiency)

63.5 lb/hr \* 6 hr/day \* 0.009 = **3.43 pounds per day** 

Total PM 0.43 tpy

Page 168 of 169

Note: Emissions are from mass balance.

Operation	
hr/dy	2
dy/wk	5
wk/yr	12
dy/yr	60
Meat Cooked (lb/yr)	7,500
Fat Content	10.00%

### Number of Units 4

\*Charbroilers came online mid October 2022

### **VOC Emissions**

(Annual quantity of meat cooked)\*(% fat content)\*(Emission Factor)

30,000 lb/yr\*

0.5 (lb VOC/lb fat)= 300.00 pounds per year

Total VOC 0.15 typ
Total VOC 5 ppd
Total OSD VOC 5 ppd

PM(10) Emissions

(Annual quantity of meat cooked)\*(% fat content)\*(Emission Factor)

30,000

lb/yr\* 0.10 \*

0.10 \*

0.5 (lb PM/lb fat)= 300.00 pounds per year

Total PM10 0.15 **tpy**Total PM10 5 **ppd** 

# U.S. ENVIRONMENTAL PROTECTION AGENCY FORM A-COMP – ANNUAL COMPLIANCE CERTIFICATION

A. GE	NEKAL INFORMATION	OMB Control No. 2060-0336
1.	Identifying Information. All facilities must complete this section.	
	Source or company name National Security Agency	
	Mailing address: Street of P.O. Box <u>9800 Savage Road</u> , Suite 6218 City <u>Fort Meade</u> State <u>MD</u> ZIP <u>20755</u> - <u>6218</u>	
	Contact person Samantha Schutt Title Environmental Engineer	
	Telephone (301) 688 - 2970 Ext Title V permit no. 24-003-00317	
2.	Reporting Period. You must complete this section. The reporting period should be the one-year, or sh Title V permit. It will be assumed that the beginning date begins and ends at Midnight (12 A.M.), unless	orter period, required by your you specify otherwise.
	Period beginning 01 / 01 / 2022 Period ending 12 / 31 / 2022	
B. CEI	RTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS	
1.	Responsible Official.	
	Name: (Last) Westfall (First) Randy (MI) A	
	Title Chief, Installations and Logistics	
	Street or P.O. Box <u>9800 Savage Road</u> City <u>Fort Meade</u> State <u>MD</u> ZIP <u>20755</u>	
	Telephone (301) 688 - 2970 Ext Facsimile (301) 688 - 5487	
2.	<u>Certification of Truth, Accuracy and Completeness</u> . The Responsible official must sign this statement for each applicable requirement.	nt after the form is completed
	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the st contained in these documents are true, accurate and complete.	atements and information
	Name (signed) Mathlew Varis on behelf of	
	Name (typed) Randy Westfall Date: 3 / 21 / 2023	

### Form A-COMP Continued

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

### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None

**Monitoring:** The Permittee shall: (1) Properly operate and maintain the boilers in a manner to prevent visible emissions; and (2) Verify no visible emissions when burning No. 2 fuel oil. The Permittee shall perform a visual observations for a 6-minute period once for each 168 hours that the boiler burns oil or at a minimum of once per year. **Completed.** 

**Recordkeeping:** The Permittee shall: (1) Maintain an operation manual and prevention maintenance plan on site; (2) Maintain a record of the maintenance performed that relates to combustion performance; (3) Maintain a log of visible emissions observations performed and make it available to the Department's representative upon request; and (4) Maintain a record of the hours that No. 2 fuel oil is burned. **Completed Reporting:** The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". **Not necessary** 

### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference) the Permit Term or Condition  CONTROL OF SULFUR OXIDES [COMAR 26.11.09.07A(2)] – A person may not burn, sell, or make	Unit ID(s):	Compliance status during reporting period
available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the	5-0502	roporting poriod
following limitations: In Areas III and IV: (b) Distillate fuel oils, 0.3 percent.	5-0503 5-0504	Intermittent Compliance
	5-0505	X Continuous Compliance

### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None

**Monitoring:** The Permittee shall obtain a certification from the fuel supplier indicating that the oil complies with the limitation on the sulfur content of the fuel oil. **Completed** 

**Recordkeeping:** The Permittee shall maintain records of the fuel supplier's certification and shall make records available to the Department upon request. **Completed** 

Reporting: The Permittee shall report fuel supplier certification to the Department upon request. Available

### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference) the Permit Term or Condition	Unit ID(s):	Compliance status during
CONTROL OF NITROGEN OXIDES [COMAR 26.11.09.08B(5)] – Operator Training: a) For purposes	5-0502	reporting period
of this regulation, the equipment operator to be trained may be the person who maintains the	5-0503	lust a was it to ust
equipment and makes the necessary adjustments for efficient operation. b) The operator training	5-0504	Intermittent Compliance
course sponsored by the Department shall include an in-house training course that is approved by the		X Continuous
Department. [COMAR 26.11.09.08E] – "A person who owns or operates fuel-burning equipment with a	5-0505	Compliance
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 combination 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.		

### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: The Permittee shall perform a combustion analysis once a year. Completed

Monitoring: The Permittee shall optimize combustion based on the annual combustion analysis. Completed

**Recordkeeping:** The Permittee shall maintain: (1) Records of the results of the annual combustion analysis on site; and (2) Record of training program attendance for each operator at the site. **Completed (Training conducted in 2021)** 

**Reporting:** The Permittee shall submit: (1) The results of combustion analysis to the department and the EPA upon request; and (2) A record of training program attendance for each operator to the Department upon request. **Available** 

### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference) the Permit Term or Condition  OPERATING LIMITATION – The Permittee shall only burn natural gas with No. 2 fuel oil as back up	Unit ID(s): 5-0502	Compliance status during reporting period
fuel unless the Permittee applies for and receives an approval or permit from the Department to burn alternate fuels.	5-0503 5-0504 5-0505	Intermittent Compliance X Continuous Compliance

### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None Monitoring: None

Recordkeeping: The Permittee shall maintain records of the quantity and types of fuel burned. Completed

Reporting: The Permittee shall submit records of the quantity and type of fuels burn with the annual emissions certification report. Completed

### Form A-COMP Continued

### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference) the Permit Term or Condition Compliance status during Unit ID(s): CONTROL OF VISIBLE EMISSIONS [COMAR 26.11.09.05A] - In Areas III and IV, a person may not reporting period 5-0644. 5-0645 cause or permit the discharge of emissions from any fuel burning equipment, other than water in an 5-0891, 5-0892, Intermittent uncombined form, which is visible to human observers. Exceptions - Section A(1) and (2) of this 5-0900, 5-0809, Compliance regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or 5-0810, 5-0811, X Continuous occasional cleaning of control equipment if: (a) The visible emissions are not greater than 40 percent Compliance 5-0823, 5-0842 opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period.

### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None Monitoring: None Recordkeeping: None

Reporting: The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions,

"Report of Excess Emissions and Deviations". Not necessary

Identify (Describe and Cross-reference) the Permit Term or Condition Unit ID(s): Compliance status during CONTROL OF NITROGEN OXIDES [COMAR 26.11.09.08B(5)] - Operator Training: a) For purposes reporting period 5-0644. 5-0645 of this regulation, the equipment operator to be trained may be the person who maintains the 5-0891. 5-0892. Intermittent equipment and makes the necessary adjustments for efficient operation. b) The operator training 5-0900, 5-0809, Compliance course sponsored by the Department shall include an in-house training course that is approved by the 5-0810. 5-0811. Continuous Department. [COMAR 26.11.09.08F] - "(1) A person who owns or operates a space heater as defined Compliance 5-0823. 5-0842 in Regulation .01B of this chapter shall: (a) Submit to the Department a list of each affected installation on the premises and the types of fuel used in each installation; (b) Develop an operating and maintenance plan to minimize NOx emissions based upon the recommendations of equipment vendors and other information including the source's operating and maintenance experience; (c) Implement the operating and maintenance plan and maintain the plan at the premises for review upon request by the Department; (d) Require installation operators to attend in-State operator training programs once every 3 years on combustion optimization that are sponsored by the Department, the EPA, or equipment vendors; and (e) 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. (2) A person who owns and operates an installation that no longer qualifies as a space heater shall inform the Department not later than 60 days after the date when the fuel-burning equipment did not qualify, and shall meet the applicable fuel-burning equipment RACT requirement in this regulation."

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None

**Monitoring:** The Permittee shall develop and maintain an operating and maintenance plan to minimize NOx emissions. **Completed Recordkeeping:** The Permittee shall maintain: (1) Records of maintenance performed that relates to combustion performance in keeping with the requirements of an operations and maintenance plan; (2) Record of training program attendance for each operator; (3) An operations manual and preventive maintenance plan; and (4) Records of fuel use that demonstrate the boiler's status as a space heater or process boiler. **Completed Reporting:** The Permittee shall submit a record of training program attendance for each operator to the Department upon request. **Available** 

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None Monitoring: None

Recordkeeping: The Permittee shall maintain records of the quantity and types of fuel burned. Completed

Reporting: The Permittee shall submit records of the quantity and type of fuels burn with the annual emissions certification report. Completed

Identify (Describe and Cross-reference) the Permit Term or Condition Unit ID(s): Compliance status during **CONTROL OF VISIBLE EMISSIONS [COMAR 26.11.09.05B]** – (1) Emissions During Idle Mode. A reporting period 9-0804, person may not cause or permit the discharge of emissions from any engine, operating at idle, greater 9-0806. 9-0807 Intermittent than 10 percent opacity. (2) Emissions During Operating Mode. A person may not cause or permit the 9-0818, 9-0819 Compliance discharge of emissions from any engine, operating at other than idle conditions, greater than 40 9-0820. 9-0821 X Continuous percent opacity. (3) Exceptions. (a) Section B(2) does not apply for a period of 2 consecutive minutes Compliance 9-0822. 9-0823 after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system. (b) 9-0918, 9-0967, Section B(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for 9-1035, 9-1055, the following maximum periods: (i) Engines that are idled continuously when not in service: 30 minutes; 9-1090, 9-1091, (ii) All other engines: 15 minutes. (c) Section B(2) and (3) does not apply while maintenance, repair, or 9-1092, 9-1117, testing is being performed by qualified mechanics. 9-1137, 9-1146

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None

Monitoring: The Permittee shall properly operate and maintain the engines in a manner to minimize visible emissions. Completed

**Recordkeeping:** The Permittee shall retain records of preventive maintenance on sire for at least five years and make these records available to the Department upon request. **Completed** 

Reporting: The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions,

"Report of Excess Emissions and Deviations". Not necessary

Identify (Describe and Cross-reference) the Permit Term or Condition	Unit ID(s):	Compliance status during
<b>CONTROL OF SULFUR OXIDES [COMAR 26.11.09.07A(2)]</b> – A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: In Areas III and IV: (b) Distillate fuel oils, 0.3 percent.	9-0804, 9-0806, 9-0807 9-0818, 9-0819 9-0820, 9-0821 9-0822, 9-0823 9-0918, 9-0967, 9-1035, 9-1055,	reporting period  Intermittent Compliance _X Continuous Compliance
	9-1090, 9-1091, 9-1092, 9-1117, 9-1137, 9-1146	

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None

**Monitoring:** The Permittee shall obtain a certification from the fuel supplier indicating that the fuel oil complies with the limitation on the sulfur content of the fuel oil. **Completed** 

**Recordkeeping:** The Permittee shall retain annual fuel supplier certifications stating that fuel oil is in compliance with this regulation must be maintained for at least 5 years. **Completed** 

Reporting: The Permittee shall report annual fuel supplier certification to the Department upon request. Available

Identify (Describe and Cross-reference) the Permit Term or Condition	Unit ID(s):	Compliance status
CONTROL OF NITROGEN OXIDES [COMAR 26.11.09.08G] – (1) A person who owns or operates	9-0804,	during reporting period
fuel-burning equipment with a capacity factor (as defined in 40 CFR Part 72.2) of 15 percent or less	9-0806, 9-0807	Intermittent
shall: (a) Provide certification of the capacity factor of the equipment to the Department in writing; (b)	9-0818, 9-0819	Compliance
For fuel-burning equipment that operates more than 500 hours during a calendar year, perform a	9-0820, 9-0821	_X_ Continuous
combustion analysis and optimize combustion at least once annually; (c) Maintain the results of the	9-0822, 9-0823	Compliance
combustion analysis at this site for at least 2 years and make these results available to the Department	9-0918, 9-0967,	
and the EPA upon request; (d) Require each operator of an installation, except combustion turbines, to	9-1035, 9-1055,	
attend operator training programs at least once every 3 years, on combustion optimization that are	9-1090, 9-1091,	
sponsored by the Department, the EPA, or equipment vendors; and (e) Maintain a record of training	9-1092, 9-1117,	
program attendance for each operator at the site and make these records available to the Department	9-1137, 9-1146	
upon request. (2) A person who owns and operates a combustion turbine with a capacity factor greater	,	
than 15 percent shall meet an hourly average NOx emission rate of not more than 42 ppm when		
burning gas or 65 ppm when burning fuel oil (dry volume at 15 percent oxygen) or meet applicable		
Prevention of Significant Deterioration limits, whichever is more restrictive.		

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

**Testing:** The Permittee shall perform a combustion analysis and optimize combustion at least once annually for any of the engines that operates more than 500 hours during a calendar year. **Completed.** 

If the Permittee operates the turbine in excess of 15 percent capacity factor, the Permittee shall demonstrate compliance with the 42-ppm limit by performing an EPA Reference Method Test within 120 days after exceeding the 15 percent capacity factor. The Permittee shall submit a test protocol to the Department for approval at least 30 days prior to the proposed test date. **Not necessary** 

**Monitoring:** For engines that operate more than 500 hours during a calendar year, the Permittee shall perform a combustion analysis and optimize combustion. The Permittee shall calculate the capacity factor of the combustion turbine within 30 days after the end of each month. **Completed when necessary.** 

**Recordkeeping:** The Permittee shall maintain records of the results of the combustion analyses and any stack tests on site for at least five years and make them available to the Department and EPA upon request. The Permittee shall maintain a record of the calculated capacity factor. The Permittee shall maintain record of training program attendance for each operator on site for at least five years and make the records available to the Department upon request. **Completed** 

**Reporting:** The Permittee shall provide certification of the capacity factor of the equipment to the Department in writing as part of the April 1 certification report. The Permittee shall submit a list of trained operators to the Department upon request. A person subject to this regulation shall maintain annual fuel use records on site for not less than 3 years and make these records available to the Department upon request. **Completed** 

Identify (Describe and Cross-reference) the Permit Term or Condition	Unit ID(s):	Compliance status during
<b>OPERATING LIMITATION</b> – Each of the six (6) emergency generators sets shall not operate more than 125 hours a year, unless the source obtains a prior approval from the Department.	9-0818, 9-0819 9-0820, 9-0821	reporting period Intermittent Compliance
	9-0822, 9-0823	<u>X</u> Continuous Compliance

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None

**Monitoring:** The Permittee shall log the number of hours each generator is operated on a daily basis for generator preventive maintenance. **Completed** 

**Recordkeeping:** The Permittee shall maintain records of hours of Preventative Maintenance testing operation, emergency operation, and BGE peak demand operations on a daily basis. The Permittee shall keep records of Preventative Maintenance Testing on file for review by the Department. The Permittee shall maintain a record of hours of operation, fuel use and criteria pollutant emission estimates for each emergency generator. The Permittee shall maintain copies of written notification for at least five years. **Completed** 

**Reporting:** The Permittee shall report to the Department records of hours of operation upon request. The Permittee shall submit with annual Emission Certification Report a record of the hours of operation, fuel use and criteria pollutant emission estimates for each emergency generator. The Permittee shall notify the Department by phone and followed by written notification when emergency operations and/or peak demand operations. **Completed** 

#### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

requirements of 40 CFR 60, Subpart IIII shall be equipped with a non-resettable hour meter.  9-1 9-1	0918, 9-0967, 1035, 9-1055, 1090, 9-1091, 1092, 9-1117, 1137, 9-1146	reporting period Intermittent Compliance X Continuous Compliance
--	--	--

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None Monitoring: None

Recordkeeping: All records must be maintained for a period of at least 5 years. The Permittee shall maintain a log for the emergency generator indicating the amounts of fuel oil combusted, the hours of operation, and reason for generator operation (i.e., maintenance of operational testing, power outage, etc.). The Permittee shall maintain on site for the life of the source the following records for the emergency diesel generator(s): (a) Documentation of the manufacture date of the diesel engine, if manufactured prior to April 1, 2006 and the manufacturer model year of the diesel engine; (b) The installation date of each emergency diesel generator; and (c) The certifications of compliance or manufacturer engine test data required by 40 CFR §60.4211 and §60.4214(b). Beginning October 1, 2007, for any NSPS emergency diesel generator the Permittee shall for each fuel delivery obtain from the fuel supplier a fuel supplier certification consisting of the name of the oil supplier, the date of delivery, the amount of fuel delivered, and a statement from the fuel supplier that the diesel fuel oil complies with the specifications of 40 CFR §80.510. The Permittee shall maintain the required records on site for at least five (5) years. Completed

Reporting: None

#### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference) the Permit Term or Condition Unit ID(s): Compliance status during OPERATING LIMITATION 40 CFR 60 Subpart IIII] - (1) The Permittee must operate and maintain an NSPS reporting period 9-0918, 9-0967. emergency diesel generator and control devices according to the manufacturer's written instructions or according 9-1035, 9-1055, to procedures developed by the owner or operator that are approved by the manufacturer. Additionally the Intermittent 9-1090. 9-1091. Compliance Permittee may change only those settings that are permitted by the manufacturer. The Permittee must also meet 9-1092, 9-1117, the requirements of 40 CFR Parts 89, 94 and/or 1068, as they may apply to an owner or operator. (2) Beginning 9-1137, 9-1146 Continuous October 1, 2007, an NSPS emergency diesel generator must combust diesel fuel meeting the requirements of 40 Compliance CFR §80.510(a) (sulfur content: 500 ppm maximum), unless a waiver is obtained from the Department and/or the EPA Administrator. (3) Beginning October 1, 2010, an NSPS emergency diesel generator must combust diesel fuel meeting the requirements of 40 CFR §80.510(b) (sulfur content: 15 ppm maximum), unless a waiver is obtained from the Department and/or the EPA Administrator. (4) In accordance with 40 CFR §60.4211(e), non-emergency use of each NSPS emergency diesel generator for the purpose of maintenance checks and readiness testing is limited to 100 hours per year or less unless prior approval is received from the Department.

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None Monitoring: None

**Recordkeeping:** Records of fuel combusted, hours of operation, and reason for generator operation are recorded monthly. **Completed Reporting:** The Permittee shall report the amounts of fuel combusted, the hours of operation, and reason for generator operation (i.e.,

maintenance or operational testing, power outage, etc.) to the Department in the annual emission certification report due on April 1 of each year.

Completed

Identify (Describe and Cross-reference) the Permit Term or Condition	Unit ID(s):	Compliance status during
CONTROL OF VISIBLE EMISSIONS [COMAR 26.11.06.02C(2)] – A person may not cause or permit	9-0449	reporting period
the discharge of emissions from any installation or building, other than water in an uncombined form, which is visible to human observers. Exceptions – The visible emissions standards in §C of this regulation do not apply to emissions during startup and process modifications or adjustments, or occasional cleaning of control equipment if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period.	9-0450	Intermittent

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None

Monitoring: The Permittee shall conduct a monthly 1-minute visual observation of the baghouse exhaust. The visual observation must be conducted while the pulp paper operation and baghouse are in operation. If no visible emissions are observed in six consecutive monthly observations from the baghouse exhaust, the Permittee may decrease the frequency of visual observations from monthly to quarterly for the baghouse exhaust. If visible emissions are observed during any quarter visual observation, the Permittee must resume the observation of the baghouse exhaust on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly visual observations. If visible emissions are observed during any observation, the Permittee must inspect baghouse for cause of visible emission and perform necessary adjustments or repairs within 24-hours or prior to operating the pulp paper operation. If visible emissions have not been eliminated, the Permittee shall perform daily 18-minute visual observation for opacity in accordance with EPA Reference Method 9 when operating the pulp paper operation. Completed

**Recordkeeping:** The Permittee shall maintain a site a log of the dates and results of visible emissions observations for a period of at least 5 years. **Completed** 

**Reporting:** The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". **Not necessary** 

Identify (Describe and Cross-reference) the Permit Term or Condition  CONTROL OF PARTICULATE MATTER [COMAR 26.11.06.03B(2)(a)] – A person may not cause or	Unit ID(s): 9-0449	Compliance status during reporting period
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).	9-0450	Intermittent Compliance X Continuous Compliance

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None

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

**Recordkeeping:** The Permittee shall maintain a copy of the preventive maintenance plan and a record of the dates of and description of maintenance activity performed. The Permittee shall maintain records of the baghouse malfunctions and the corrective actions taken to bring into proper operation. **Completed** 

Reporting: None

#### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference) the Permit Term or Condition  OPERATIONAL LIMITATION – The Permittee shall record the annual quantity of material processed by the automatic material collection system and separate continuous operating system and shall maintain these records for at least 5 years.	Unit ID(s): 9-0449 9-0450	Compliance status during reporting period  Intermittent Compliance X Continuous Compliance
---	---------------------------------	--

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

**Testing:** None **Monitoring:** None

**Recordkeeping:** The Permittee shall record the annual quantity of material processed by the paper pulp operation and shall maintain these records on site for at least 2 years. **Completed** 

Reporting: The Permittee shall make records available to the Department upon request and submit records with annual Emission Certification

Report. Completed

#### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference) the Permit Term or Condition	Unit ID(s):	Compliance status during
CONTROL OF VISIBLE EMISSIONS [COMAR 26.11.06.02C(2)] – A person may not cause or permit	6-0375	reporting period
the discharge of emissions from any installation or building, other than water in an uncombined form,	0 00.0	
which is visible to human observers. Exceptions – The visible emissions standards in §C of this		Intermittent Compliance
regulation do not apply to emissions during startup and process modifications or adjustments, or		X Continuous
occasional cleaning of control equipment if: (a) The visible emissions are not greater than 40 percent		Compliance
opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty		·
minute period.		

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None
Monitoring: None
Recordkeeping: None
Reporting: None

#### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference) the Permit Term or Condition	Unit ID(s):	Compliance status during
CONTROL OF PARTICULATE MATTER [COMAR 26.11.06.03B(2)(a)] – A person may not cause or	6-0375	reporting period
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).	0 0070	Intermittent Compliance X Continuous Compliance

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None

**Monitoring:** The Permittee shall perform preventive maintenance once per month or as recommended by the equipment manufacturer on scrubbers that control emissions units. **Completed** 

**Recordkeeping:** The Permittee shall maintain a log of the maintenance performed on the scrubbers. The log shall be kept on site for at least five years and make available to the Department upon request. **Completed** 

Reporting: None

#### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference) the Permit Term or Condition	Unit ID(s):	Compliance status during
CONTROL OF VOLATILE ORGANIC COMPOUNDS [COMAR 26.11.19.13] – These provisions apply	6-1114	reporting period
to any metal surface coating operation at a premises where the total VOC emissions from all metal	•	Intermittent
surface coating operations not specifically covered by not specifically covered by COMAR 26.11.19.03		Compliance X Continuous
through .10 exceed 20 pounds per day. A person may not cause or permit the discharge of VOC into		Compliance
the atmosphere from a miscellaneous metal coating operation unless the following emission standards		- '
are achieved: High Performance Coating – 3.5 pounds per gallon of coating applied (minus water);		
Clear Coating – 4.3 pounds per gallon of coating applied (minus water); and Standard – 3.0 pounds per		
gallon of coating applied (minus water).		

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None Monitoring: None

**Recordkeeping:** All records must be maintained for a period of at least 5 years. The Permittee shall maintain monthly records of the hours of spray booth operation, cleaning, and material usage on site for at least five (5) years and make available to the Department upon request.

Completed

Reporting: The Permittee shall report material usage to the Department annually in the Emission Certification Report. Completed

Identify (Describe and Cross-reference) the Permit Term or Condition	Unit ID(s):	Compliance status during
CONTROL OF VOLATILE ORGANIC COMPOUNDS – This general permit applies only to autobody	6-1095	reporting period
repair facilities that: (1) are at a fixed stationary location; (2) Use not more than 400 gallons of vehicle	0-1095	Intermittent
refinishing material per year; (3) Have two or less paint spray booths; and (4) Do not use materials		Compliance
containing: (a) lead; (b) formaldehyde; or (c) pot life extenders. Operating Requirements: (1) All spray		X Continuous
painting shall be conducted exclusively by personnel who are trained and certified as painters. (2) The		Compliance
following painting operations can be performed by non-certified painters: (a) Painting with brushes,		
rollers, markers or other non-atomizing applications; (b) spray painting from non-refillable hand-held		
aerosol containers; or (c) spray painting from guns with a paint cup size 3 oz or less. (3) All spray		
painting shall be conducted in a spray booth or preparation station. (4) All spray booths and preparation		
stations used to refinish complete motor vehicles or mobile equipment shall be fully enclosed having		
four complete walls or side curtains and a full roof. (5) All spray booths and preparation stations used to		
coat miscellaneous parts and products or vehicles subassemblies shall have at least three complete		
walls or side curtains and a full roof. (6) All mobile enclosures used to perform spot repairs must		
enclose and, if necessary seal against the surface around the area being painted in order to ensure		
that paint overspray is retained within the enclosure. (7) All spray booths, preparation stations and		
mobile enclosures shall be equipped with an exhaust gas filter having at least 98% capture efficiency		
during all times of use. Waterwash spray booths and preparation stations that are operated and		
maintained according to the manufacturer's specification are exempt from this requirement. (8) All		
spray booths and preparation stations shall be ventilated through the exhaust gas filter at a negative		
pressure. Fully enclosed and sealed spray booths equipped with an automatic pressure balancing		
system may be operated at up to, but not more than 0.05 inches water gauge positive pressure. (9) All		
spray applied coatings shall be applied by HVLP spray guns, electrostatic application, airless spray		
guns, air-assisted airless spray guns, or an equivalent technology that is demonstrated by the spray		
gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed,		
and for which written approval has been obtained by the Administrator. (10) Any paint stripping		
performed with a chemical paint stripper containing Methylene Chloride requires the following		
practices: (a) An evaluation of the application to determine if paint stripping is necessary; (b) An		
evaluation of the application to determine if another paint stripping alternative could be used; (c)		
Minimization of air exposure by the chemical paint stripper; (d) Optimization of application conditions;		
and (e) The proper storage and disposal of the chemical paint stripper. (11) VOC content of materials		
used shall not exceed the limitations listed in the Title V permit. (12) Use of specialty coatings may not		
exceed five percent by volume of all coatings on a monthly basis. (13) The Permittee shall perform the		
following good operating practices and equipment cleanup procedures to reduce VOC emissions: (a)		
Establish good operating practices in writing; (b) Make the written operating practices available to the		
Department upon request; (c) Display the good operating practices so that they are clearly visible to the		
operator, or include them in operator training; (d) Provide training for equipment operators on the		
practices, procedures, and maintenance requirements that are consistent with equipment		
manufacturer's recommendations and the Permittee's experience in operating the equipment; (e)		
Minimize material or color changes when applying VOC coatings, whenever practical; (f) Mix or blend		
VOC materials in closed containers to reduce VOC emissions, as practical; (g) Maintain lids on all VOC		
containers when not in use; (h) Store VOC contaminated materials in closed containers; (i) Promptly		

contain and clean spills and leaks of materials containing VOC; (j) Use enclosed spray gun cleaning,	
VOC-recycling systems and other spray gun cleaning methods; and use detergents, high-pressure	
water, or other non-VOC cleaning options to clean lines, containers, equipment, where practical.	
<u>Training Requirements:</u> (1) All personnel, including contract personnel, who spray coatings must be	
trained and certified no later than 180 days after hiring. (2) Training and certification is valid for a	
period not to exceed five years after the date of training is completed. (3) All personnel who spray	
coatings must receive refresher training and be recertified every five years.	

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None

**Monitoring:** The Permittee shall check MSDS to ensure that the VOC content of coatings is less than the applicable standard. The MSDS shall contain VOC data that is based on EPA Method 24 testing or equivalent. **Completed** 

**Recordkeeping:** The following records must be kept for at least 5 years after the date of each record: (a) certification that each painter has completed the required training, with the date of the initial training and the most recent refresher training was completed; (b) documentation of the filter efficiency of any spray booth exhaust filter material; (c) for spray guns that are not HVLP spray guns, electrostatic application, airless spray guns, or air-assisted/air-less spray guns, documentation from the manufacturer that the gun achieves equivalent transfer efficiency and has received written approval by the Administrator; (d) copies of any Notifications; (e) copies of any annual reports; (f) records of any deviations from the federal requirements outlined in this permit; (g) Records of any assessments of source compliance; (h) Records of usage of paint stripper containing Methylene Chloride; and (j) Total Volume and VOC content of coatings, cleanup materials and surface preparation materials purchased. **Completed** 

Reporting: Existing shops (before September 17, 2007) must submit initial notification to MDE and EPA by January 10, 2011. Completed

#### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference) the Permit Term or Condition	Unit ID(s):	Compliance status during
CONTROL OF VOLATILE ORGANIC COMPOUNDS [COMAR 26.11.19.02l] – Good Operating Practices (a) A person who is subject to this section shall implement good operating practices to minimize VOC emissions into the atmosphere. (b) Good operating practices, at a minimum, include the following: (i) Provisions for training operators on practices, procedures, and maintenance requirements that are consistent with the equipment manufacturers' recommendations and the source's experience in operating the equipment, with the training to include proper procedures for maintenance of air pollution control equipment; (ii) Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use; (iii) As practical, scheduling of operations to minimize color or material changes when applying VOC coatings or other materials by spray gun; (iv) For spray gun applications of coatings, use of high volume low pressure (HVLP) or other high efficiency application methods where practical; and (v) As practical, mixing or blending materials containing VOC in closed containers and taking preventive measures to minimize emissions for products that contain VOC.	Facility-Wide	reporting period Intermittent Compliance _X Continuous Compliance

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None

**Monitoring:** The Permittee shall conduct facility-wide inspections at least once per calendar month to determine the compliance status of facility operations with regard to implementation of "good operating practices" designed to minimize emissions of VOC. **Completed** 

**Recordkeeping:** The Permittee shall maintain: (1) Written descriptions of all "good operating practices" designed to minimize emissions of VOC from facility-wide operations; and (2) Records of all inspections conducted to determine the facility's compliance status with regard to implementation of "good operating practices" designed to minimize emissions of VOC from facility-wide operations. The records shall include for each inspection the name of the inspector, the data and time of the inspection, and an account of the findings. **Completed** 

**Reporting:** Good operating practices information as required by COMAR 26.11.19.o2l shall be made available to the Department upon request.

**Available** 

#### C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

#### D. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

Testing: None

**Monitoring:** The Permittee shall conduct facility-wide inspections at least once per calendar month to determine the compliance status of facility operations with regard to implementation of "good operating practices" designed to minimize emissions of VOC. **Completed** 

**Recordkeeping:** The Permittee shall maintain: (1) Written descriptions of all "good operating practices" designed to minimize emissions of VOC from facility-wide operations; and (2) Records of all inspections conducted to determine the facility's compliance status with regard to implementation of "good operating practices" designed to minimize emissions of VOC from facility-wide operations. The records shall include for each inspection the name of the inspector, the data and time of the inspection, and an account of the findings. **Completed** 

**Reporting:** Good operating practices information as required by COMAR 26.11.19.o2I shall be made available to the Department upon request.

**Available** 

#### E. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

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

Permit Term for Which There is a Deviation & Whether the Deviation is a "Possible Exception to Compliance"	Emission Units (unit IDs)	Deviation Time Periods Date(mo/dy/yr) Time(hr/min) Time Zone	Written Deviation Report Submittal Date (mo/dy/yr)
N/A		Beginning//:::	/ /
		Beginning//::::	
		Beginning// :::	<u> </u>
		Beginning//:::	
		Beginning//:::	
		Beginning//:::	
		Beginning / / : ::	<u></u>

#### F. Other Deviations From Permit Terms

All sources must complete this section. Answer questions 1 through 5 below as a group for each deviation from permit terms that is required to be reported for the first time in this monitoring report form. This page may be used to report three separate deviations. Copy this page as many times as necessary to include all such deviations. Include all such deviations including those that occur during startup, shutdown, malfunction, and upset conditions. Question 1: describe and cross-reference the permit terms for which there is a deviation. Question 2: list the Emission unit ID (if not available, identify by some other method) where the deviation occurred. Question 3: Report the beginning and ending times for each deviation using the 24-hour clock. Question 4: Briefly explain (if known) the probable cause of each deviation from permit terms. Question 5: If any corrective actions or preventative measures were taken to avoid these same types of deviation at the same emissions units, briefly describe them. If known, include dates when such actions or measures were taken or will be taken in the future.

1. Permit Term for Which There is a Deviation:	2. Emission Units (unit IDs):	3. Time Period: Date(mo/dy/yr) Time(hr:min) Time Zone
N/A		Beginning Ending
4. Probable Cause of Deviation:	5. Corrective Actions or Preventative Measures Taken:	
1. Permit Term for Which There is a Deviation:	2. Emission Units (unit IDs):	3. Time Period: Date(mo/dy/yr) Time(hr:min) Time Zone
		Beginning / / :: Ending / / : ::
4. Probable Cause of Deviation:	5. Corrective Actions or Preventative Measures Taken:	
1. Permit Term for Which There is a Deviation:	2. Emission Units (unit IDs):	3. Time Period: Date(mo/dy/yr) Time(hr:min) Time Zone
		Beginning// ::: Ending// ::
4. Probable Cause of Deviation:	5. Corrective Actions or Preventative Measures Taken:	

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

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

- 1. Particulate Matter from Construction and Demolition

  In compliance throughout 2022
- 2. Open Burning

In compliance throughout 2022

3. Air Pollution Episode (N/A)

Not applicable

4. Report of Excess Emissions and Deviations

(All deviations from permit requirements should be clearly identified in quarterly monitoring reports.)

In compliance throughout 2022

5. Accidental Release Provisions (if applicable)

Not applicable

6. General Testing Requirements

In compliance throughout 2022

7. Emissions Test Methods

In compliance throughout 2022

8. Emission Certification Report

In compliance throughout 2022

- 9. Compliance Certification Report

  In compliance throughout 2022
- 10. Certification by Responsible Official In compliance throughout 2022
- 11. Sampling and Emissions Testing Record Keeping
  In compliance throughout 2022
- 12. General Record Keeping

  In compliance throughout 2022
- 13. General Conformity (N/A except for Federal facilities)

  In compliance throughout 2022
- 14. Asbestos Provisions (if applicable)

  In compliance throughout 2022
- 15. Ozone Depleting Regulations (if applicable)

  In compliance throughout 2022
- 16. Acid Rain Permit (if applicable) **Not applicable**

# Appendix C

Compliance Assurance Monitoring Plan

## APPENDIX C – Compliance Assurance Monitoring Plan

Under the definition of a control device contained in the Compliance Assurance Monitoring (CAM) regulations (40 CFR 64, i.e., not inherent process equipment), only one emission unit at the source are potentially subject to the CAM rule. It is:

• The Plating Shop (#6-0375)

The emissions unit does not meet all of the criteria found in 40 CFR 64.2(a), as follows:

 The Plating Shop (#6-0375) does not have the uncontrolled potential to emit any criteria pollutant, hazardous air pollutant or aggregate of all hazardous air pollutants that would exceed the relevant major source threshold.

Therefore, no emissions unit at the source is subject to the requirements of the CAM rule.