AIR AND RADIATION ADMINISTRATION
DRAFT PART 70 OPERATING PERMIT

DOCKET # 24-031-1951

COMPANY: WASHINGTON GAS LIGHT COMPANY
ROCKVILLE STATION

LOCATION: 7301 WESTMORE ROAD
ROCKVILLE, MD 20849

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MARYLAND DEPARTMENT OF THE ENVIRONMENT
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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 Washington Gas Light Company for the Rockville Station facility located in Montgomery County, MD. The facility includes six compressors, four natural-gas fired boilers, four natural gas-fired steam boilers, one emergency generator, and four natural gas-fired line heaters.

The applicant is represented by:

Mr. Kevin Murphy, VP, Asset Management
Washington Gas Light Company
6801 Industrial Rd
Springfield, Virginia 22151

The Department has prepared a draft Part 70 Operating Permit for review and is now ready to receive public comment. A docket containing the application, draft permit, and supporting documentation is available for review on the Department's website, under the Air Quality Permitting Page's Title V link under "Draft Title V Permits" and may be viewed here:

https://tinyurl.com/DraftTitleV

Interested persons may submit written comments or request a public hearing on the draft permit. Written comments must be received by the Department no later than 30 days from the date of this notice. Requests for a public hearing must be submitted in writing and must also be received by the Department no later than 30 days from the date of this notice.

Comments and requests for a public hearing will be accepted by the Department if they raise issues of law or material fact regarding applicable requirements of Title V of the Clean Air Act, and/or regulations implementing the Title V Program in Maryland found in COMAR.

A Request for public hearing shall include the following:

1) The name, mailing address, and telephone number of the person making the request;

2) The names and addresses of any other persons for whom the person making the request if representing; and

3) The reason why a hearing is requested, including the air quality concern that forms the basis for the request and how this concern relates to the person making the request.

All written comments and requests for a public hearing should be directed to the attention of Ms. Shannon Heafey via email at Shannon.heafey@maryland.gov or by post at Air Quality Permits Program, Air and Radiation Administration, 1800 Washington Boulevard Suite 720, Baltimore, Maryland 21230-1720. Further information may be obtained by calling Ms. Shannon Heafey at (410) 537-4433.

WASHINGTON GAS – ROCKVILLE STATION (AI# 5093)
7301 WESTMORE ROAD
ROCKVILLE, MD 20849
PERMIT NO. 24-031-1951
PART 70 OPERATING PERMIT FACT SHEET

BACKGROUND

The Washington Gas Rockville Station is a peak shaving facility that stores propane and natural gas underground and hexane in aboveground storage tanks. The station provides supplemental fuel to maintain pressure in the natural gas supply systems during peak demand periods, which typically occur in the winter months, between November and April. The station may also be used during emergencies and system failures, which could occur during off-peak periods of the year. The station typically operates about 10 days per year. The primary NAICS code for the facility is 221210.

Equipment at the Rockville Station consists of five (5) 1,200 Hp Worthington compressors, one (1) 2,000-hp Ingersoll Rand compressor, four (4) natural-gas fired boilers, four (4) natural gas-fired steam boilers, one (1) 1,462 Hp emergency generator and four (4) natural gas-fired line heaters. All of the fuel burning equipment and internal combustion engine driven compressors are designed to burn only natural gas. The end product is gas fuel delivered to the Washington Gas distribution pipeline.

EMISSION UNIT IDENTIFICATION

Washington Gas-Rockville Station has identified the following emission units as being subject to Title V permitting requirements and having applicable requirements. These emission units are summarized in Table 1.

Table 1: Emission Unit Identification

Emissions Unit Number	MDE Reg. No.	Emissions Unit Name and Description	Date of Installation
EU-1	9-0592	Worthington Compressor Unit #1 1,200-hp output (2SLB) Natural Gas/Air Compressor Model UTC-16-6, Serial No. G-2020	08/52
EU-2	9-0593	Worthington Compressor Unit #2 1,200-hp output (2SLB) Natural Gas/Air Compressor Model UTC-16-6, Serial No. G-2021	08/52

Emissions Unit Number	MDE Reg. No.	Emissions Unit Name and Description	Date of Installation
EU-3	9-0594	Worthington Compressor Unit #3 1,200-hp output (2SLB) Natural Gas/Air Compressor Model UTC-16-6, Serial No. G-2022	08/52
EU-4	9-0595	Worthington Compressor Unit #4; 1,200-hp output (2SLB) Natural Gas/Air Compressor Model UTC-16-6, Serial No. G-2023	08/1952
EU-5	9-0597	Worthington Compressor Unit #5 1,200-hp output (2SLB) Natural Gas/Air Compressor Model UTC-16-6, Serial No. G-2536	07/1962
EU-6	9-0596	Ingersoll Rand Compressor Unit #6 2,000-hp output (4SRB) Natural Gas/Air Compressor Model 412 KVS, Serial No. 412-FT-583	12/1971
EU-7	5-1093	Erie City Keystone Water Tube Boiler #7; 34.5 MMBtu/hr. Input Natural Gas Fired Boiler, Serial No. 96648	05/1964
EU-8	5-1092	Erie City Keystone Water Tube Boiler #8; 34.5 MMBtu/hr. Input Natural Gas Fired Boiler, Serial No. 97777	09/1968
EU-9	5-1096	Cleaver Brooks Boiler #9; 41.6 MMBtu/hr. Input Natural Gas Fired Boiler, Serial No. WI-3135	11/1982
EU-10	5-1097	Cleaver Brooks Boiler #10; 6.3 MMBtu/hr. Input Natural Gas Fired Boiler, Serial No. L89077	11/1991
EU-12	5-1694	Total Energy Resources Line Heater #12; 7.0 MMBtu/hr. Input Natural Gas Fired Indirect Line Heater.	11/2003
EU-13	5-1695	Total Energy Resources Line Heater #13; 7.0 MMBtu/hr. Input Natural Gas Fired Indirect Line Heater.	11/2003
EU-14	9-0800	Caterpillar Emergency Generator #14; 1,462-hp Output Natural Gas Fired Engine Model G3516LE	10/2005
EU-15	5-2270	Columbia Line Heater #1; 7.5 MMBtu/hr. Input Natural Gas Fired Indirect Line Heater	11/2011
EU-16	5-2271	Columbia Line Heater #2; 7.5 MMBtu/hr. Input Natural Gas Fired Indirect Line Heater	11/2011

Table 2 summarizes the actual emissions from Washington Gas–Rockville Station based on the most recent annual Emission Certification Reports.

Table 2: Actual Emissions

Year	NO_X (TPY)	SO_X (TPY)	PM_{10} (TPY)	CO (TPY)	VOC (TPY)	Total HAPs (TPY)
2023	5.16	0.01	0.04	2.09	0.21	0.0397
2022	8.29	0.03	0.09	4.49	0.37	0.15
2021	6.88	0.03	0.09	4.32	0.33	0.13
2020	6.73	0.03	0.09	4.17	0.32	0.12
2019	8.50	0.03	0.09	4.28	0.37	0.14
2018	7.78	0.03	0.09	4.11	0.34	0.13
Major Source Threshold	*25*	*100*	*100*	*100*	*25*	*25*

The major source threshold for triggering Title V permitting requirements in Montgomery County are 25 tons per year for VOC and NO_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 potential NO_X emissions from the facility are greater than the major source threshold, Washington Gas-Rockville Station is required to obtain a Title V – Part 70 Operating Permit under COMAR 26.11.03.01.

The Department received the Washington Gas-Rockville Station's Part 70 permit renewal application on June 28, 2023. An administrative completeness review was conducted, and the application was deemed to be administratively complete. A letter was sent to Washington Gas-Rockville Station on August 8, 2023, granting Washington Gas-Rockville Station an application shield.

CHANGES AND MODIFICATIONS TO THE PART 70 OPERATING PERMIT

There have been no additions or modifications to the facility since the previous Title V permit was issued.

GREENHOUSE GAS (GHG) EMISSIONS

The Washington Gas-Rockville Station emits the following greenhouse gases (GHGs) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHGs originate from various fuel-burning or combustions processes at the facility, including emissions from natural gas fired boilers, line heaters and reciprocating internal combustion engines (RICE). The facility is not a major source of GHG emissions and has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements.

Table 3 summarizes the actual emissions from Washington Gas-Rockville Station based on its annual Emission Certification Reports.

Table 3: Greenhouse Gases Emissions Summary

GHG	Conversion factor	2020 tpy CO_2e	2021 tpy CO_2e	2022 tpy CO_2e	2023 tpy CO_2e
Carbon dioxide, CO_2	1	5,782.81	5,850.37	6,136.00	2,738.00
Methane, CH_4	25	0.71	0.76	1.19	0.95
Nitrous Oxide, N_2O	298	0.11	0.11	0.11	0.049
Total GHG, CO_{2eq}		**5,783.63**	**5,851.24**	**6,137.30**	**2,738.999**

Compliance Assurance Monitoring (CAM)

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.

In order for a unit to be subject to CAM, it must be as follows: 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 Washington Gas Rockville Station is considered a "Major Source"; however, no emissions control devices are used to achieve compliance with any emissions standard for any regulated pollutant emitted at the facility. Therefore, the Washington Gas-Rockville Station is not subject to CAM.

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 Number(s): EU-1 thru EU-5, EU-6 & EU-14

EU-1 thru EU-5:
Five (5) Worthington 1,200-hp compressors. **[MDE Reg. No. 9-0592 thru 9-0595 & 9-0597]**

EU-6:
One (1) Ingersoll-Rand 2,000-hp compressor. **[MDE Reg. No. 9-0596]**

EU-14:
One (1) Caterpillar 1,462-hp emergency generator. **[MDE Reg. No. 9-0800]**

Background:
EU-1 through EU-4, Worthington natural gas fired reciprocating engines are used to compress natural gas or air. The EU-5 Worthington unit and the EU-6 Ingersoll-Rand unit are typically used to compress air. The natural gas is compressed for storage in high-pressure underground bottles. Air is compressed for storage and for mixing with the propane to bring its Btu rating down to that of natural gas before adding the gas mix to the distribution system. EU-14, the 1,460 HP Caterpillar emergency generator was installed in 2005 under PTC 031-9-0800 N, issued February 2, 2006.

***Permitting History*:**
The compressor engines were installed prior to the Department's New Source Review ("NSR") program and were registered as existing sources of air pollution. No "significant" sources of emissions were constructed, reconstructed, or modified since the original equipment registrations. The Caterpillar 1,462-hp (1,091-kW) emergency generator was permitted and installed in 2005 (**EU-14**).

Compliance Status:
During May 31, 2023, full compliance inspection, the boilers and the Westmore line heaters were in operation. The six-month reports were received, and no deviations were reported. Based on the CY2021 and CY2022 Emission Certification Reports, the compressors and emergency generator operated as follows:

Emission Units	2021 Operating Hours	2022 Operating Hours	2023 Operating Hours
EU-1	61	93	60
EU-2	62	89	62
EU-3	39	94	61
EU-4	67	91	86
EU-5	15	37	22
EU-6	17	39	86
EU-14	50	77	30

The facility conducts daily checks and annual maintenance of the engines in accordance with their in-house maintenance plan. A contractor is also hired to conduct annual oil and exhaust gas analysis and make recommendations for any need maintenance/repairs.

Applicable Standards and limits

A. Control of Visible Emissions

COMAR 26.11.09.05E. – Stationary Internal Combustion Engine Powered Equipment.

"(2) Emissions During Idle Mode. A person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.

(3) Emissions During Operating Mode. A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.

(4) Exceptions.

(a) Section E(2) of this regulation does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.

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

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

(ii) All other engines: 15 minutes.

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

Compliance Demonstration

The I/C engine/compressor units are for emergency stand-by use only, operate only on natural gas and typically operate less than 15 days each year, therefore, no periodic monitoring of visible emissions is required. However, the Permittee is required to report any periods of visible emissions in accordance with Section III, Condition 4 - "Report of Excess Emissions and Deviations", should visible emissions occur.

***Rationale for Periodic Monitoring*:**

The internal combustion engines (ICEs) shall only burn natural gas. Natural gas fired ICEs typically don't produce visible emissions if properly operated and maintained. The Permittee is required to implement a preventative maintenance plan, and maintain on site an operations manual and records of maintenance performed that relate to combustion performance as part of their NO_X RACT compliance.

B. 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.

Note: A Department sponsored program can be a Company in-house training program if approved by the Department. Washington Gas shall satisfy this requirement through use of an approved in-house training program.

Compliance Demonstration

For fuel-burning equipment that operates more than 500 hours during a calendar year, the Permittee shall perform a combustion analysis and optimize combustion at least once annually. [**Reference: COMAR 26.11.09.08G**]

The Permittee shall perform engine maintenance and inspections in accordance with manufacturer's recommendations and the operations and maintenance plan. Engine inspections, tuning, and adjustments shall be performed by a qualified mechanic and in accordance with the engines manufacturer's recommendations. [**Reference: COMAR 26.11.03.06C & COMAR 26.11.09.08G**]
The Permittee shall:

Maintain monthly records of the amounts and type of fuels burned and the hours of operation of each compressor or generator engine.

Maintain records of any equipment malfunctions, repairs and preventative maintenance performed as they relate to combustion performance.

Maintain a record of the results of any combustion analysis performed for at least 2 years (as required for engines operating 500 hours per year or more) and make available to the Department or EPA upon request.

Maintain a record of the in-house training program attendance for each operator at the site and make these records available to the Department upon request. [**Reference: COMAR 26.11.03.06C & COMAR 26.11.09.08G**]

The Permittee shall submit along with the annual emissions certification, monthly fuel use records and generator operating hours records and certification of the capacity factor and/or results of the combustion analysis (as required). **[Reference: COMAR 26.11.03.06C**]

Note: (For EU-6 & EU-14, only): Records shall include the reasons for the emergency generator operation (i.e., maintenance, operational testing, or power outage, etc.)

***Rationale for Periodic Monitoring*:**

Monitoring of hours of operation, records required to satisfy the NO_X RACT requirements of COMAR 26.11.09.08G and the annual emissions certification that are sufficient to demonstrate compliance.

Emission Unit Number(s): EU-1 thru EU-5

EU-1 thru EU-5: Five (5) Worthington 1200 HP compressors {Non-Emergency Units} **[MDE Reg. No. 9-0592 thru 9-0595 & 9-0597]**

Applicable Standards and limits:

Control of HAPs

40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

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

(a) *Affected sources.* (1)" ….. If you have ……..an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations, operating limitations, and other requirements no later than October 19, 2013."

Emission and Operating Limitations

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

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

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

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

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

For each	You must meet the following requirement, except during periods of startup.	During periods of startup you must.
6. ***Non-emergency***, non-black start 2SLB stationary RICE	a. Change oil and filter every 4,320 hours of operation or annually, whichever comes first;[1]	
	b. Inspect spark plugs every 4,320 hours of operation or annually, whichever comes first, and replace as necessary; and	
	c. Inspect all hoses and belts every 4,320 hours of operation or annually, whichever comes first, and replace as necessary.	

[1]Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

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

General Compliance Requirements

§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:
(**5**) An existing non-emergency, non-black start 2SLB stationary RICE located at an area source of HAP emissions;

(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.

(j) If you own or operate a stationary SI engine that is subject to the work, operation or management practices in items 6, 7, or 8 of Table 2c to this subpart or in **items** 5, **6,** 7, 9, or 11 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 Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid 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 business days of receiving the results of the analysis; if the engine is not in

operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business 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.

§63.6655 – What records must I keep?

(a) If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).
(2) Records of the occurrence and duration of each malfunction of operation (*i.e.,* process equipment) or the air pollution control and monitoring equipment.
(3) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).
(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.
(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(b) You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.

§63.6650 – <u>What reports must I submit and when?</u>

(a) You must submit each report in Table 7 of this subpart that applies to you.

(b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date in Table 7 of this subpart and according to the requirements in paragraphs (b)(1) through (b)(9) of this section.
(5) For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), you may submit the first and

subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (b)(4) of this section.

(f) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority.

Emission Unit Number(s): EU-6 & EU-14 {Emergency RICE}

EU-6: One (1) Ingersoll-Rand 2000 HP compressor. **[MDE Reg. No. 9-0596]**

EU-14: One (1) Caterpillar 1462 HP emergency generator. **[MDE Reg. No. 9-0800]**

Emergency stationary RICE means any stationary reciprocating internal combustion engine that meets all of the criteria in paragraphs (1) through (3) of this definition. All emergency stationary RICE must comply with the requirements specified in §63.6640(f) in order to be considered emergency stationary RICE. If the engine does not comply with the requirements specified in §63.6640(f), then it is not considered to be an emergency stationary RICE under this subpart.

(1) The stationary RICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc.

(2) The stationary RICE is operated under limited circumstances for situations not included in paragraph (1) of this definition, as specified in §63.6640(f).

(3) The stationary RICE operates as part of a financial arrangement with another entity in situations not included in paragraph (1) of this definition only as allowed in §63.6640(f)(4)(i) or (ii).

Note: Washington Gas received an applicability determination from US EPA on February 23, 2015 noting that the 10 engines that operate at a similar WG facility (Ravenworth Station) are in fact considered emergency stationary RICE as defined in Subpart ZZZZ. Based on conversations with MDE, this applicability determination also applies to **EU-6** since it is operated in the same capacity as the engines noted in the determination.

Applicable Standards and limits:

Control of HAPs

40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
§63.6595 – When do I have to comply with this subpart?

(a) *Affected sources.* (1)" ….. If you have ……..an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations, operating limitations, and other requirements no later than October 19, 2013."

Emission and Operating Limitations

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

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

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

Note: There are no applicable limits in Table 2b that apply to Existing SI Stationary RICE >500 HP.

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
5. **Emergency stationary SI RICE**; black start stationary SI RICE; non-emergency, non-black start 4SLB stationary RICE >500 HP that operate 24 hours or less per calendar year; non-emergency, non-black start 4SRB stationary RICE >500 HP that operate 24 hours or less per calendar year.[2]	a. Change oil and filter every 500 hours of operation or annually, whichever comes first;[1]; b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	

[1]Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

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

General Compliance Requirements

§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 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.

(j) If you own or operate a stationary SI engine that is subject to the work, operation or management practices in items 6, 7, or 8 of Table 2c to this subpart or in **items 5**, 6**,** 7, 9, or 11 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 Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid 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 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business 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, operating limitations, and other requirements?

(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 and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4), is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) You may operate your emergency stationary RICE for the purposes specified in paragraphs (f)(2)(i) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains

records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

Monitoring Requirements:

Control of HAPs

§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 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.

(j) If you own or operate a stationary SI engine that is subject to the work, operation or management practices in items 6, 7, or 8 of Table 2c to this subpart or in **items 5**, 6**,** 7, 9, or 11 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 Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid 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 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business 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, operating limitations, and other requirements?

(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, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) You may operate your emergency stationary RICE for the purposes specified in paragraphs (f)(2)(i) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards

require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(ii)–(iii) [Reserved]" **[Reference: 40 CFR §63.6640 (f)(1 & 2)]**

(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 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.

(i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.

(ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator." **[Reference: 40 CFR §63.6640 (f)(4)]**

§63.6655 – <u>What records must I keep?</u>

(d) You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.

(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;

(1) *Not Applicable*.

(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.

(1) *Not Applicable*.

(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. **[Reference: 40 CFR 63 Subpart ZZZZ – Footnote 2, Table 2d]**

Emission Unit Number(s): EU-7 thru EU-10, EU-12 - EU-13 & EU-15 - EU-16

EU-7: One (1) 34.5 MMBtu/hr. Erie City Keystone natural gas fired boiler **[MDE Reg. No. 5-1093]**

EU-8: One (1) 34.5 MMBtu/hr. Erie City Keystone natural gas fired boiler **[MDE Reg. No. 5-1092]**

EU-9: One (1) 41.6 MMBtu/hr. Cleaver Brooks model D-52 natural gas fired boiler **[MDE Reg. No. 5-1096]**

EU-10: One (1) 6.3 MMBtu/hr. Cleaver Brooks model 700-150 natural gas fired boiler **[MDE Reg. No. 5-1097]**

EU-12: One (1) 7.0 MMBtu/hr. Total Energy Resources natural gas fired heater **[MDE Reg. No. 5-1694]**

EU-13: One (1) 7.0 MMBtu/hr. Total Energy Resources natural gas fired heater **[MDE Reg. No. 5-1695]**

EU-15: One (1) 7.5 MMBtu/hr. Columbia natural gas fired heater **[MDE Reg. No. 5-2270]**

EU-16: One (1) 7.5 MMBtu/hr. Columbia natural gas fired heater **[MDE Reg. No. 5-2271]**

Background:

Although the boilers EU-7, EU-8, & EU-9, are less than 100 MMBtu/hr. but greater than 10 MM Btu/hr., construction commenced on these units in 1964, 1968, and 1982, respectively. Therefore, the boilers are not subject to 40 CFR 60 Subpart Dc, the National Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, which applies to "Small Boilers" and whose construction commenced after June 9, 1989. The boilers are used to preheat the compressed natural gas or to vaporize propane.

Boiler EU-10 is used for comfort heating of the boiler room.

The line heaters (EU-12, EU-13, EU-15, & EU-16) are used when gas must be fed directly from the Columbia Gas and Williams/TransCo transmission lines and into the Washington Gas service distribution line. The gas pressure must first be reduced and preheated to assure that super cooled gas is not introduced to the Washington Gas distribution lines.

***Permitting History*:**

No construction, reconstruction, or modification has occurred to the boilers since installation. Two (2) 7.0 MM Btu/hr. Total Energy Resources, Inc. line heaters were installed in November of 2003, and two (2) 7.5 MM Btu/hr. National Combustion Company (NATCO) natural gas fired indirect line heaters were installed in November of 2001; and no modification or reconstructions has occurred to these units since installation. The boilers are not subject to the Boiler MACT (40 CFR 63 Subpart JJJJJJ because the rule specifically exempts" gas-fired boilers" [Ref. §63.11195 (e)].

Compliance Status

During the May 31, 2023 full compliance inspection, the boilers and the Westmore line heaters were in operation. No visible emissions were observed and a 12- minute average opacity of 0% from the Line Heater #1 & #2 stack were recorded. The odors were not detected on or beyond the property line. The facility was in compliance with all the testing, monitoring, record keeping and reporting requirements. The records showed compliance with permit conditions. A review of the records in the file over the past 5 years indicates that ARA did not issue any Notices-of-Violation nor taken any enforcement actions against the Company.

Based on the CY2021 and CY2022 Emission Certification Reports, the boilers and heaters operated as follows:

Emission Units	2021 Operating Hours	2022 Operating Hours	2023 Operating Hours
EU-7	1455	106	128
EU-8	62	773	204
EU-9	899	1526	624
EU-10	36	14	18
EU-12	117	173	127
EU-13	139	139	100
EU-15	414	556	510
EU-16	429	414	361

Applicable Standards and limits:

A. Control of Visible Emissions

COMAR 26.11.09.05 – Visible Emissions.

A. **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

The Permittee shall keep the equipment in good working order and properly maintained as to assure compliance with the visible emissions requirements. **[Reference: COMAR 26.11.03.06C].** The Permittee shall report any periods of

visible emissions in accordance with Section III, Condition 4 - "Report of Excess Emissions and Deviations"

B. Control of Nitrogen Oxides

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

(c) NO_x emissions based on the recommendations of equipment vendors and other information including the source's operating and maintenance experience;

(d) Implement the operating and maintenance plan and maintain the plan at the premises for review upon request by the Department;

(e) 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

(f) 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.

Note *: A Department sponsored program can be a Company in-house training program if approved by the Department. Washington Gas shall satisfy this requirement through use of an approved in-house training program.

Compliance Demonstration

The Permittee shall develop and maintain an operating and maintenance plan to minimize NO_X emissions. **[Reference: COMAR 26.11.09.08F]**
The Permittee shall:

Maintain monthly records of the amounts and type of fuels burned and the hours of operation of each boiler.

Maintain records of attendance for operator training program for each operator.

Maintain records of any equipment malfunctions, repairs and preventative maintenance performed.
[Reference: COMAR 26.11.03.06C & COMAR 26.11.09.08F]

The Permittee shall submit along with the annual emissions certification, monthly fuel use records and calculations verifying that the facility still meets the requirements of a "Space Heater" as defined in Condition 1.1B. **[Reference: COMAR 26.11.03.06C]**

Rationale for Periodic Monitoring:

Records that are required to satisfy the NO_X RACT requirements of COMAR 26.11.09.08F and the annual emissions certification that are sufficient to demonstrate compliance.

COMPLIANCE SCHEDULE

Washington Gas-Rockville Station is currently in compliance with all applicable air quality regulations.

TITLE IV – ACID RAIN

Not Applicable

TITLE VI – OZONE DEPLETING SUBSTANCES

Washington Gas-Rockville Station is not subject to Title VI requirements.

SECTION 112(r) – ACCIDENTAL RELEASE

Washington Gas-Rockville Station is not subject to the requirements of Section 112(r).

PERMIT SHIELD

Washington Gas-Rockville Station did not request a permit shield.

INSIGNIFICANT ACTIVITIES

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

(1) No. 5 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.

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

(3) No. 1 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

The ***affected unit*** is 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.

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

(a) ✓ Storage of butane, propane, or liquefied petroleum, or natural gas;

(b) No. 12 Storage of lubricating oils;

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

(d) No. 1 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;

(5) ✓ 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;

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

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

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

For the following, attach additional pages as necessary:

(9) 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. 4 Makeup air heaters

No. 2 Water heaters

No. 2 Underground odorant storage tanks; emissions controlled by flare.

No. 1 Hexane Storage and Gas Conditioning System (including four (4) 30,000-gallon hexane tanks)

STATE ONLY ENFORCEABLE REQUIREMENTS

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

Applicable Regulations:

COMAR 26.11.06.08 - Nuisance.
"An installation or premises may not be operated or maintained in such a manner that a nuisance or air pollution is created. Nothing in this regulation relating to the control of emissions may in any manner be construed as authorizing or permitting the creation of, or maintenance of, nuisance or air pollution."

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."

WASHINGTON GAS LIGHT COMPANY
WASHINGTON GAS - ROCKVILLE STATION
7301 WESTMORE ROAD
ROCKVILLE, MD 20849
DRAFT PART 70 OPERATING PERMIT NO. 24-031-1951

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SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

The Washington Gas Rockville Station is a peak shaving facility that stores propane and natural gas underground and hexane in aboveground storage tanks. The station provides supplemental fuel to maintain pressure in the natural gas supply systems during peak demand periods, which typically occur in the winter months, between November and April. The station may also be used during emergencies and system failure, which could occur during off-peak periods of the year. The station typically operates about 10 days per year. The primary NAICS code for the facility is 221210.

Equipment at the Rockville Station consists of five (5) 1,200-hp Worthington compressor engines, one (1) 2,000-hp Ingersoll Rand compressor engine, four (4) natural-gas fired boilers, four (4) natural gas-fired steam boilers, one (1) 1,462-hp emergency generator and four (4) natural gas-fired line heaters. All of the fuel burning equipment and internal combustion engine driven compressors are designed to only burn natural gas.

2. FACILITY INVENTORY LIST

Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
EU-1	9-0592	Worthington Compressor Unit #1 1200-hp output (2SLB) Natural Gas/Air Compressor Model UTC-16-6, Serial No. G-2020	08/52
EU-2	9-0593	Worthington Compressor Unit #2 1200-hp output (2SLB) Natural Gas/Air Compressor Model UTC-16-6, Serial No. G-2021	08/52
EU-3	9-0594	Worthington Compressor Unit #3 1200-hp output (2SLB) Natural Gas/Air Compressor Model UTC-16-6, Serial No. G-2022	08/52
EU-4	9-0595	Worthington Compressor Unit #4 1200-hp output (2SLB) Natural Gas/Air Compressor Model UTC-16-6, Serial No. G-2023	08/52

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Emissions Unit Number	MDE - ARA Registration Number	Emissions Unit Name and Description	Date of Installation
EU-5	9-0597	Worthington Compressor Unit #5 1200-hp output (2SLB) Natural Gas/Air Compressor Model UTC-16-6, Serial No. G-2536	07/62
EU-6	9-0596	Ingersoll Rand Compressor Unit #6 2000-hp output (4SRB) Natural Gas/Air Compressor Model 412 KVS, Serial No. 412-FT-583	12/71
EU-7	5-1093	Erie City Keystone Water Tube Boiler #7 34.5 MMBtu/hr. Input Natural Gas Fired Boiler, Serial No. 96648	05/64
EU-8	5-1092	Erie City Keystone Water Tube Boiler #8 34.5 MMBtu/hr. Input Natural Gas Fired Boiler, Serial No. 97777	09/68
EU-9	5-1096	Cleaver Brooks Boiler #9 41.6 MMBtu/hr. Input Natural Gas Fired Boiler, Serial No.WI-3135	11/82
EU-10	5-1097	Cleaver Brooks Boiler #10 6.3 MMBtu/hr. Input Natural Gas Fired Boiler, Serial No.L89077	11/91
EU-12	5-1694	Total Energy Resources Line Heater #12 7.0 MM Btu/hr. Input Natural Gas Fired Indirect Line Heater.	11/2003
EU-13	5-1695	Total Energy Resources Line Heater #13 7.0 MMBtu/hr. Input Natural Gas Fired Indirect Line Heater.	11/2003
EU-14	9-0800	Caterpillar Emergency Generator #14 1462 hp Output Natural Gas Fired Engine Model G3516LE	10/2005
EU-15	5-2270	Columbia Line Heater #1 7.5 MMBtu/hr Input Natural Gas Fired Indirect Line Heater	11/2011
EU-16	5-2271	Columbia Line Heater #2 7.5 MMBtu/hr Input Natural Gas Fired Indirect Line Heater	11/2011

SECTION II GENERAL CONDITIONS

1. DEFINITIONS

[COMAR 26.11.01.01] and [COMAR 26.11.02.01]

The words or terms in this Part 70 permit shall have the meanings established under COMAR 26.11.01 and .02 unless otherwise stated in this permit.

2. ACRONYMS

ARA	Air and Radiation Administration
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEM	Continuous Emissions Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMAR	Code of Maryland Regulations
EPA	United States Environmental Protection Agency
FR	Federal Register
gr	grains
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
MDE	Maryland Department of the Environment
MVAC	Motor Vehicle Air Conditioner
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO_X	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OTR	Ozone Transport Region
PM	Particulate Matter
PM10	Particulate Matter with Nominal Aerodynamic Diameter of 10 micrometers or less
ppm	parts per million
ppb	parts per billion
PSD	Prevention of Significant Deterioration
PTC	Permit to construct
PTO	Permit to operate (State)
SIC	Standard Industrial Classification

SO_2	Sulfur Dioxide
TAP	Toxic Air Pollutant
tpy	tons per year
VE	Visible Emissions
VOC	Volatile Organic Compounds

3. EFFECTIVE DATE

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

4. PERMIT EXPIRATION

[COMAR 26.11.03.13B(2)]

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

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

5. PERMIT RENEWAL

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

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

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

information shall be submitted to the Department no later than 20 days after a new requirement has been adopted.

6. CONFIDENTIAL INFORMATION

[COMAR 26.11.02.02G]

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

7. PERMIT ACTIONS

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

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

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

a. Additional requirements of the Clean Air Act become applicable to this facility and the remaining permit term is 3 years or more;

b. The Department or the EPA determines that this Part 70 permit contains a material mistake, or is based on false or inaccurate information supplied by or on behalf of the Permittee;

c. The Department or the EPA determines that this Part 70 permit must be revised or revoked to assure compliance with applicable requirements of the Clean Air Act; or

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

8. PERMIT AVAILABILITY

[COMAR 26.11.02.13G]

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

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

[COMAR 26.11.03.20B]

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

10. TRANSFER OF PERMIT

[COMAR 26.11.02.02E]

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

11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS

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

a. The Permittee shall submit an application to the Department to revise this Part 70 permit when required under COMAR 26.11.03.15 -.17.

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

c. The Permittee may not change any provision of a compliance plan or schedule in a Part 70 permit as an administrative permit amendment or as a minor permit modification unless the change has been approved by the Department in writing.

d. A permit revision is not required for a change that is provided for in this permit relating to approved economic incentives, marketable permits, emissions trading, and other similar programs.

12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS

[COMAR 26.11.03.17]

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

a. A significant modification is a revision to the federally enforceable provisions in the permit that does not qualify as an administrative permit amendment under COMAR 26.11.03.15 or a minor permit modification as defined under COMAR 26.11.03.16.

b. This permit does not preclude the Permittee from making changes, consistent with the provisions of COMAR 26.11.03, that would make the permit or particular terms and conditions of the permit irrelevant, such as by shutting down or reducing the level of operation of a source or of an emissions unit within the source. Air pollution control equipment shall not be shut down or its level of operation reduced if doing so would violate any term of this permit.

c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal,

including the requirements for applications, public participation, and review by affected states and EPA, except:

(1) An application need include only information pertaining to the proposed change to the source and modification of this permit, including a description of the change and modification, and any new applicable requirements of the Clean Air Act that will apply if the change occurs;

(2) Public participation, and review by affected states and EPA, is limited to only the application and those federally enforceable terms and conditions of the Part 70 permit that are affected by the significant permit modification.

d. As provided in COMAR 26.11.03.15B(5), an administrative permit amendment may be used to make a change that would otherwise require a significant permit modification if procedures for enhanced preconstruction review of the change are followed that satisfy the requirements of 40 CFR 70.7(d)(1)(v).

e. Before making a change that qualifies as a significant permit modification, the Permittee shall obtain all permits-to-construct and approvals required by COMAR 26.11.02.

f. The Permittee shall not make a significant permit modification that results in a violation of any applicable requirement of the Clean Air Act.

g. The permit shield in COMAR 26.11.03.23 applies to a final significant permit modification that has been issued by the Department, to the extent applicable under COMAR 26.11.03.23.

13. MINOR PERMIT MODIFICATIONS

[COMAR 26.11.03.16]

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

a. A minor permit modification is a Part 70 permit revision that:

(1) Does not result in a violation of any applicable requirement of the Clean Air Act;

(2) Does not significantly revise existing federally enforceable monitoring, including test methods, reporting, record keeping, or compliance certification requirements except by:

(a) Adding new requirements,

(b) Eliminating the requirements if they are rendered meaningless because the emissions to which the requirements apply will no longer occur, or

(c) Changing from one approved test method for a pollutant and source category to another;

(3) Does not require or modify a:

(a) Case-by-case determination of a federally enforceable emissions standard,

(b) Source specific determination for temporary sources of ambient impacts, or

(c) Visibility or increment analysis;

(4) Does not seek to establish or modify a federally enforceable permit term or condition for which there is no corresponding underlying applicable requirement of the Clean Air Act, but that the Permittee has assumed to avoid an applicable requirement to which the source would otherwise be subject, including:

(a) A federally enforceable emissions standard applied to the source pursuant to COMAR 26.11.02.03 to avoid classification as a Title I modification; and

(b) An alternative emissions standard applied to an emissions unit pursuant to regulations promulgated under Section 112(i)(5) of the Clean Air Act

(5) Is not a Title I modification; and

(6) Is not required under COMAR 26.11.03.17 to be processed as a significant modification to this Part 70 permit.

b. Application for a Minor Permit Modification

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

(1) A description of the proposed change, the emissions resulting from the change, and any new applicable requirements that will apply if the change is made;

(2) The proposed minor permit modification;

(3) Certification by a responsible official, in accordance with COMAR 26.11.02.02F, that:

(a) The proposed change meets the criteria for a minor permit modification, and

(b) The Permittee has obtained or applied for all required permits-to-construct required by COMAR 26.11.03.16 with respect to the proposed change;

(4) Completed forms for the Department to use to notify the EPA and affected states, as required by COMAR 26.11.03.07-.12.

c. Permittee's Ability to Make Change

(1) For changes proposed as minor permit modifications to this permit that will require the applicant to obtain a permit to construct, the permit to construct must be issued prior to the new change.

(2) During the period of time after the Permittee applies for a minor modification but before the Department acts in accordance with COMAR 26.11.03.16F(2):

(a) The Permittee shall comply with applicable requirements of the Clean Air Act related to the change and the permit terms and conditions described in the application for the minor modification.

(b) The Permittee is not required to comply with the terms and conditions in the permit it seeks to modify. If the Permittee fails to comply with the terms and conditions in the application during this time, the terms and conditions of both this permit and the application for modification may be enforced against it.

d. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.16 is not within the scope of this regulation.

e. Minor permit modification procedures may be used for Part 70 permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, but only to the extent that the minor permit modification procedures are explicitly provided for in regulations approved by the EPA as part of the Maryland SIP or in other applicable requirements of the Clean Air Act.

14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS

[COMAR 26.11.03.15]

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

a. An application for an administrative permit amendment shall:

(1) Be in writing;

(2) Include a statement certified by a responsible official that the proposed amendment meets the criteria in COMAR 26.11.03.15 for an administrative permit amendment, and

(3) Identify those provisions of this part 70 permit for which the amendment is requested, including the basis for the request.

b. An administrative permit amendment:

(1) Is a correction of a typographical error;

(2) Identifies a change in the name, address, or phone number of a person identified in this permit, or a similar administrative change involving the Permittee or other matters which are not directly related to the control of air pollution;

(3) requires more frequent monitoring or reporting by the Permittee;

(4) Allows for a change in ownership or operational control of a source for which the Department determines that no other revision to the permit is necessary and is documented as per COMAR 26.11.03.15B(4);

(5) Incorporates into this permit the requirements from preconstruction review permits or approvals issued by the Department in accordance with COMAR 26.11.03.15B(5), but only if it satisfies 40 CFR 70.7(d)(1)(v);

(6) Incorporates any other type of change, as approved by the EPA, which is similar to those in COMAR 26.11.03.15B(1)—(4);

(7) Notwithstanding COMAR 26.11.03.15B(1)—(6), all modifications to acid rain control provisions included in this Part 70 permit are governed by applicable requirements promulgated under Title IV of the Clean Air Act; or

(8) Incorporates any change to a term or condition specified as State-only enforceable, if the Permittee has obtained all necessary permits-to-construct and approvals that apply to the change.

c. The Permittee may make the change addressed in the application for an administrative amendment upon receipt by the Department of the application, if all permits-to-construct or approvals otherwise required by COMAR 26.11.02 prior to making the change have first been obtained from the Department.

d. The permit shield in COMAR 26.11.03.23 applies to administrative permit amendments made under Section B(5) of COMAR 26.11.03.15, but only after the Department takes final action to revise the permit.

e. The Permittee is subject to enforcement action if it is determined at any time that a change made under COMAR 26.11.03.15 is not within the scope of this regulation.

15. OFF-PERMIT CHANGES TO THIS SOURCE

[COMAR 26.11.03.19]

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

a. The Permittee may make a change to this permitted facility that is not addressed or prohibited by the federally enforceable conditions of this Part 70 permit without obtaining a Part 70 permit revision if:

(1) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

(2) The change is not subject to any requirements under Title IV of the Clean Air Act;

(3) The change is not a Title I modification; and

(4) The change does not violate an applicable requirement of the Clean Air Act or a federally enforceable term or condition of the permit.

b. For a change that qualifies under COMAR 26.11.03.19, the Permittee shall provide contemporaneous written notice to the Department and the EPA, except for a change to an emissions unit or activity that is exempt from the Part 70 permit application, as provided in COMAR 26.11.03.04. This written notice shall describe the change, including the date it was made, any change in emissions, including the pollutants emitted, and any new applicable requirements of the Clean Air Act that apply as a result of the change.

c. Upon satisfying the requirements of COMAR 26.11.03.19, the Permittee may make the proposed change.

d. The Permittee shall keep a record describing:

(1) Changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement of the Clean Air Act , but not otherwise regulated under this permit; and

(2) The emissions resulting from those changes.

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

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

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

h. The Permittee is subject to enforcement action if it is determined that an off-permit change made under COMAR 26.11.03.19 is not within the scope of this regulation.

16. ON-PERMIT CHANGES TO SOURCES

[COMAR 26.11.03.18]

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

a. The Permittee may make a change to this facility without obtaining a revision to this Part 70 permit if:

(1) The change is not a Title I modification;

(2) The change does not result in emissions in excess of those expressly allowed under the federally enforceable provisions of the Part 70 permit for the permitted facility or for an emissions unit within the facility, whether expressed as a rate of emissions or in terms of total emissions;

(3) The Permittee has obtained all permits and approvals required by COMAR 26.11.02 and .03;

(4) The change does not violate an applicable requirement of the Clean Air Act;

(5) The change does not violate a federally enforceable permit term or condition related to monitoring, including test methods, record keeping, reporting, or compliance certification requirements;

(6) The change does not violate a federally enforceable permit term or condition limiting hours of operation, work practices, fuel usage, raw material usage, or production levels if the term or condition has been established to limit emissions allowable under this permit;

(7) If applicable, the change does not modify a federally enforceable provision of a compliance plan or schedule in this Part 70 permit unless the Department has approved the change in writing; and

(8) This permit does not expressly prohibit the change under COMAR 26.11.03.18.

b. The Permittee shall notify the Department and the EPA in writing of a proposed on-permit change under COMAR 26.11.03.18 not later than 7 days before the change is made. The written information shall include the following information:

(1) A description of the proposed change;

(2) The date on which the change is proposed to be made;

(3) Any change in emissions resulting from the change, including the pollutants emitted;

(4) Any new applicable requirement of the Clean Air Act; and

(5) Any permit term or condition that would no longer apply.

c. The responsible official of this facility shall certify in accordance with COMAR 26.11.02.02F that the proposed change meets the criteria for the use of on-permit changes under COMAR 26.11.03.18.

d. The Permittee shall attach a copy of each notice required by condition b. above to this Part 70 permit.

e. On-permit changes that qualify under COMAR 26.11.03.18 are not subject to the requirements for part 70 permit revisions.

f. Upon satisfying the requirements under COMAR 26.11.03.18, the Permittee may make the proposed change.

g. The permit shield in COMAR 26.11.03.23 does not apply to on-permit changes under COMAR 26.11.03.18.

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

17. FEE PAYMENT

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

a. The fee for this Part 70 permit is as prescribed in Regulation .19 of COMAR 26.11.02.

b. The fee is due on and shall be paid on or before each 12-month anniversary date of the permit.

c. Failure to pay the annual permit fee constitutes cause for revocation of the permit by the Department.

18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS

[COMAR 26.11.02.09.]

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

a. New Source Review source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

b. Prevention of Significant Deterioration source, as defined in COMAR 26.11.01.01, approval required, except for generating stations constructed by electric companies;

c. New Source Performance Standard source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

d. National Emission Standards for Hazardous Air Pollutants source, as defined in COMAR 26.11.01.01, permit to construct required, except for generating stations constructed by electric companies;

e. A stationary source of lead that discharges one ton per year or more of lead or lead compounds measured as elemental lead, permit to construct required, except for generating stations constructed by electric companies;

f. All stationary sources of air pollution, including installations and air pollution control equipment, except as listed in COMAR 26.11.02.10, permit to construct required;

g. In the event of a conflict between the applicability of (a. — e.) above and an exemption listed in COMAR 26.11.02.10, the provision that requires a permit applies.

h. Approval of a PSD or NSR source by the Department does not relieve the Permittee obtaining an approval from also obtaining all permits-to-construct required by (c. — g.) above.

19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION

[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

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

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

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

20. PROPERTY RIGHTS

[COMAR 26.11.03.06E(4)]

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

21. SEVERABILITY

[COMAR 26.11.03.06A(5)]

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

22. INSPECTION AND ENTRY

[COMAR 26.11.03.06G(3)]

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

a. Enter at a reasonable time without delay and without prior notification the Permittee's property where a Part 70 source is located, emissions-related activity is conducted, or records required by this permit are kept;

b. Have access to and make copies of records required by the permit;

c. Inspect all emissions units within the facility subject to the permit and all related monitoring systems, air pollution control equipment, and practices or operations regulated or required by the permit; and

d. Sample or monitor any substances or parameters at or related to the emissions units at the facility for the purpose of determining compliance with the permit.

23. DUTY TO PROVIDE INFORMATION

[COMAR 26.11.03.06E(5)]

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

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

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

24. COMPLIANCE REQUIREMENTS

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

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

a. Enforcement action,

b. Permit revocation or revision,

c. Denial of the renewal of a Part 70 permit, or

d. Any combination of these actions.

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

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

25. CREDIBLE EVIDENCE

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

26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

[COMAR 26.11.03.06E(2)]

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

27. CIRCUMVENTION

[COMAR 26.11.01.06]

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

28. PERMIT SHIELD

[COMAR 26.11.03.23]

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

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

b. The liability of the Permittee for a violation of an applicable requirement of the Clean Air Act before or when this permit is issued or for a violation that continues after issuance;

c. The requirements of the Acid Rain Program, consistent with Section 408(a) of the Clean Air Act;

d. The ability of the Department or EPA to obtain information from a source pursuant to Maryland law and Section 114 of the Clean Air Act; or

e. The authority of the Department to enforce an applicable requirement of the State air pollution control law that is not an applicable requirement of the Clean Air Act.

29. ALTERNATE OPERATING SCENARIOS

[COMAR 26.11.03.06A(9)]

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

SECTION III PLANT WIDE CONDITIONS

1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION

[COMAR 26.11.06.03D]

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

2. OPEN BURNING

[COMAR 26.11.07]

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

3. AIR POLLUTION EPISODE

[COMAR 26.11.05.04]

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

4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS

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

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

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

b. Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence;

c. When requested by the Department the Permittee shall report all deviations from permit conditions, including those attributed to malfunctions as defined in COMAR 26.11.01.07A, within 5 days of the request by submitting a written description of the deviation to the Department. The written report shall include the cause, dates and times of the onset and termination of the deviation, and an account of all actions planned or taken to reduce, eliminate, and prevent recurrence of the deviation;

d. The Permittee shall submit to the Department semi-annual monitoring reports that confirm that all required monitoring was performed, and that provide accounts of all deviations from permit requirements that occurred during the reporting periods. Reporting periods shall be January 1 through June 30 and July 1 through December 31, and reports shall be submitted within 30 days of the end of each reporting period. Each account of deviation shall include a description of the deviation, the dates and times of onset and termination, identification of the person who observed or discovered the deviation, causes and corrective actions taken, and actions taken to prevent recurrence. If no deviations from permit conditions occurred during a reporting period, the Permittee shall submit a written report that so states.

e. When requested by the Department, the Permittee shall submit a written report to the Department within 10 days of receiving the request concerning an occurrence of excess emissions. The report shall contain the information required in COMAR 26.11.01.07D(2).

5. ACCIDENTAL RELEASE PROVISIONS

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

Should the Permittee become subject to 40 CFR 68 during the term of this permit, the Permittee shall submit risk management plans by the date

specified in 40 CFR 68.150 and shall certify compliance with the requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.

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

6. GENERAL TESTING REQUIREMENTS

[COMAR 26.11.01.04]

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

7. EMISSIONS TEST METHODS

[COMAR 26.11.01.04]

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

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

a. 40 CFR 60, appendix A

b. 40 CFR 51, appendix M

c. The Department's Technical Memorandum 91-01 "Test Methods and Equipment Specifications for Stationary Sources", (January 1991), as amended through Supplement 3, (October 1, 1997)

8. EMISSIONS CERTIFICATION REPORT

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

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

a. The certification shall be on forms obtained from the Department and submitted to the Department not later than April 1 of the year following the year for which the certification is required;

b. The individual making the certification shall certify that the information is accurate to the individual's best knowledge. The individual shall be:

(1) Familiar with each source for which the certifications forms are submitted, and

(2) Responsible for the accuracy of the emissions information;

c. The Permittee shall maintain records necessary to support the emissions certification including the following information if applicable:

(1) The total amount of actual emissions of each regulated pollutant and the total of all regulated pollutants;

(2) An explanation of the methods used to quantify the emissions and the operating schedules and production data that were used to determine emissions, including significant assumptions made;

(3) Amounts, types and analyses of all fuels used;

(4) Emissions data from continuous emissions monitors that are required by this permit, including monitor calibration and malfunction information;

(5) Identification, description, and use records of all air pollution control equipment and compliance monitoring equipment including:

(a) Significant maintenance performed,
(b) Malfunctions and downtime, and
(c) Episodes of reduced efficiency of all equipment;

(6) Limitations on source operation or any work practice standards that significantly affect emissions; and

(7) Other relevant information as required by the Department.

9. COMPLIANCE CERTIFICATION REPORT

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

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

a. The compliance certification shall include:

(1) The identification of each term or condition of this permit which is the basis of the certification;

(2) The compliance status;

(3) Whether the compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of each source, currently and over the reporting period; and

(5) Any other information required to be reported to the Department that is necessary to determine the compliance status of the Permittee with this permit.

b. The Permittee shall submit the compliance certification reports to the Department and EPA simultaneously.

10. CERTIFICATION BY RESPONSIBLE OFFICIAL

[COMAR 26.11.02.02F]

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

The certification shall be in the following form:

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

11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING

[COMAR 26.11.03.06C(5)]

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

a. The location as specified in this permit, and the date and time that samples and measurements are taken;

b. All pertinent operating conditions existing at the time that samples and measurements are taken;

c. The date that each analysis of a sample or emissions test is performed and the name of the person taking the sample or performing the emissions test;

d. The identity of the Permittee, individual, or other entity that performed the analysis;

e. The analytical techniques and methods used; and

f. The results of each analysis.

12. GENERAL RECORDKEEPING

[COMAR 26.11.03.06C(6)]

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

These records and support information shall include:

a. All calibration and maintenance records;

b. All original data collected from continuous monitoring instrumentation;

c. Records which support the annual emissions certification; and

d. Copies of all reports required by this permit.

13. GENERAL CONFORMITY

[COMAR 26.11.26.09]

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

14. ASBESTOS PROVISIONS

[40 CFR 61, Subpart M]

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

15. OZONE DEPLETING REGULATIONS

[40 CFR 82, Subpart F]

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

a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the prohibitions and required practices pursuant to 40 CFR 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair or disposal of appliances shall comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repairs or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.

d. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.155.

e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.157.

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): EU-1 thru EU-6 & EU-14** **EU-1 thru EU-5**: Five (5) Worthington 1,200-hp compressors **[MDE ARA Reg No. 9-0592 thru 9-0595 & 9-0597]** **EU-6**: One (1) Ingersoll-Rand 2,000-hp compressor **[MDE ARA Reg No. 9-0596]** **EU-14**: One (1) Caterpillar 1,462-hp emergency generator **[MDE ARA Reg No. 9-0800]**
1.1	**Applicable Standards/Limits:** **A. Control of Visible Emissions** **COMAR 26.11.09.05E** – Stationary Internal Combustion Engine Powered Equipment. "(2) Emissions During Idle Mode. A person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.

Table IV – 1

(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."

B. 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;

Table IV – 1	
	(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. **Note:** A Department sponsored program can be a Company in-house training program if approved by the Department. Washington Gas shall satisfy this requirement through use of an approved in-house training program.
1.2	**Testing Requirements:** **A. Control of Visible Emissions** See Reporting Requirements **B. Control of Nitrogen Oxides** For fuel-burning equipment that operates more than 500 hours during a calendar year, the Permittee shall perform a combustion analysis and optimize combustion at least once annually. [**Reference: COMAR 26.11.09.08G**]
1.3	**Monitoring Requirements:** **A. Control of Visible Emissions** See Reporting Requirements **B. Control of Nitrogen Oxides** The Permittee shall perform engine maintenance and inspections in accordance with manufacturer's recommendations and the operations and maintenance plan. Engine inspections, tuning, and adjustments shall be performed by a qualified mechanic and in accordance with the engines manufacturer's recommendations. [**Reference: COMAR 26.11.03.06C & COMAR 26.11.09.08G**]
1.4	**Record Keeping Requirements:** **A. Control of Visible Emissions** See Reporting Requirements

Table IV – 1	
	B. Control of Nitrogen Oxides The Permittee shall: Maintain monthly records of the amounts and type of fuels burned and the hours of operation of each compressor or generator engine. Maintain records of any equipment malfunctions, repairs and preventative maintenance performed as they relate to combustion performance. Maintain a record of the results of any combustion analysis performed for at least 2 years (as required for engines operating 500 hours per year or more) and make available to the Department or EPA upon request. Maintain a record of the in-house training program attendance for each operator at the site and make these records available to the Department upon request. **[Reference: COMAR 26.11.03.06C & COMAR 26.11.09.08G]** **Note**: (For EU-6 & EU-14, only): Records shall include the reasons for the emergency generator operation (i.e., maintenance, operational testing, or power outage, etc.)
1.5	**Reporting Requirements:** **A. Control of Visible Emissions** The Permittee shall report any periods of visible emissions in accordance with Section III, Condition 4 - "Report of Excess Emissions and Deviations." **B. Control of Nitrogen Oxides** The Permittee shall submit along with the annual emissions certification, monthly fuel use records and generator operating hours records and certification of the capacity factor and/or results of the combustion analysis (as required). **[Reference: COMAR 26.11.03.06C]**

Table IV – 1a: NESHAP Subpart ZZZZ - RICE MACT	
1a.0	**Emissions Unit Number(s): EU-1 thru EU-5** **EU-1 thru EU-5**: Five (5) Worthington 1,200-hp (2SLB) natural gas fired compressors {Non-Emergency RICE} **[MDE ARA Reg No. 9-0592 thru 9-0595 & 9-0597]**
1a.1	**Applicable Standards/Limits:** **Control of HAPs** **40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.** **§63.6595** – When do I have to comply with this subpart? (a) *Affected sources.* (1)" ….. If you have ……..an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations, operating limitations, and other requirements no later than October 19, 2013." **Emission and Operating Limitations** **§63.6603** – What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions? Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this subpart. (a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in **Table 2d** to this subpart and the operating limitations in Table 1b and Table 2b to this subpart that apply to you. **Note:** There are no applicable limits in Table 2b that apply to Existing SI Stationary RICE >500 HP. **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:

Table IV – 1a: NESHAP Subpart ZZZZ - RICE MACT

For each.	You must meet the following requirement, except during periods of startup	During periods of startup you must
6***. Non-emergency***, non-black start 2SLB stationary RICE	a. Change oil and filter every 4,320 hours of operation or annually, whichever comes first;[1]	
	b. Inspect spark plugs every 4,320 hours of operation or annually, whichever comes first, and replace as necessary; and	
	c. Inspect all hoses and belts every 4,320 hours of operation or annually, whichever comes first, and replace as necessary.	

[1]Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

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

General Compliance Requirements

§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

Table IV – 1a: NESHAP Subpart ZZZZ - RICE MACT	
	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."
1a.2	**Testing Requirements:** **Control of HAPs** See Monitoring Requirements
1a.3	**Monitoring Requirements:** **Control of HAPs** **§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: (5) An existing non-emergency, non-black start 2SLB stationary RICE located at an area source of HAP emissions; (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. (j) If you own or operate a stationary SI engine that is subject to the work, operation or management practices in items 6, 7, or 8 of Table 2c to this subpart or in **items** 5, **6,** 7, 9, or 11 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 IV – 1a: NESHAP Subpart ZZZZ - RICE MACT	
	Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid 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 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business 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.
1a.4	**<u>Record Keeping Requirements</u>:** **<u>Control of HAPs</u>** **§63.6655 –** <u>What records must I keep?</u> (a) If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section. (1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv). (2) Records of the occurrence and duration of each malfunction of operation (*i.e.,* process equipment) or the air pollution control and monitoring equipment. (3) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).

Table IV – 1a: NESHAP Subpart ZZZZ - RICE MACT	
	(4) Records of all required maintenance performed on the air pollution control and monitoring equipment. (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (d) You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.
1a.5	**Reporting Requirements:** **Control of HAPs** **§63.6650** – What reports must I submit and when? (a) You must submit each report in Table 7 of this subpart that applies to you. (b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date in Table 7 of this subpart and according to the requirements in paragraphs (b)(1) through (b)(9) of this section. (5) For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), you may submit the first and subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (b)(4) of this section. (f) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating

Table IV – 1a: NESHAP Subpart ZZZZ - RICE MACT	
	limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority.

Table IV – 1b: NESHAP Subpart ZZZZ - RICE MACT	
1b.0	**Emissions Unit Number(s): EU-6 & EU-14** **EU-6**: One (1) Ingersoll-Rand 2,000-hp (4SRB) compressor **[MDE ARA Reg No. 9-0596]** **EU-14**: One (1) Caterpillar 1,462-hp emergency generator **[MDE ARA Reg No. 9-0800]** *Emergency stationary RICE* means any stationary reciprocating internal combustion engine that meets all of the criteria in paragraphs (1) through (3) of this definition. All emergency stationary RICE must comply with the requirements specified in §63.6640(f) in order to be considered emergency stationary RICE. If the engine does not comply with the requirements specified in §63.6640(f), then it is not considered to be an emergency stationary RICE under this subpart. (1) The stationary RICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc. (2) The stationary RICE is operated under limited circumstances for situations not included in paragraph (1) of this definition, as specified in §63.6640(f). (3) The stationary RICE operates as part of a financial arrangement with another entity in situations not included in paragraph (1) of this definition only as allowed in §63.6640(f)(4)(i) or (ii). **Note**: Washington Gas received an applicability determination from US EPA on February 23, 2015 noting that the 10 engines that operate at a similar WG facility (Ravenworth Station) are in fact considered emergency stationary RICE

Table IV – 1b: NESHAP Subpart ZZZZ - RICE MACT	
	as defined in Subpart ZZZZ. Based on conversations with MDE, this applicability determination also applies to **EU-6** since it is operated in the same capacity as the engines noted in the determination.
1b.1	**Applicable Standards/Limits:** **Control of HAPs** **40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.** **§63.6595** – When do I have to comply with this subpart? (a) *Affected sources.* (1)" ….. If you have ……..an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations, operating limitations, and other requirements no later than October 19, 2013." **Emission and Operating Limitations** **§63.6603** – What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions? Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this subpart. (a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in **Table 2d** to this subpart and the operating limitations in Table 1b and Table 2b to this subpart that apply to you. **Note:** There are no applicable limits in Table 2b that apply to Existing SI Stationary RICE >500 HP. **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:

Table IV – 1b: NESHAP Subpart ZZZZ - RICE MACT

For each	You must meet the following requirement, except during periods of startup.	During periods of startup you must.
5. **Emergency stationary SI RICE**; black start stationary SI RICE; non-emergency, non-black start 4SLB stationary RICE >500 HP that operate 24 hours or less per calendar year; non-emergency, non-black start 4SRB stationary RICE >500 HP that operate 24 hours or less per calendar year.[2]	a. Change oil and filter every 500 hours of operation or annually, whichever comes first;[1]; b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	

[1]Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

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

General Compliance Requirements

§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

Table IV – 1b: NESHAP Subpart ZZZZ - RICE MACT	
	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."
1b.2	**Testing Requirements:** **Control of HAPs** See Monitoring Requirements
1b.3	**Monitoring Requirements:** **Control of HAPs** **§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 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.

Table IV – 1b: NESHAP Subpart ZZZZ - RICE MACT	
	(j) If you own or operate a stationary SI engine that is subject to the work, operation or management practices in items 6, 7, or 8 of Table 2c to this subpart or in **items 5**, 6**,** 7, 9, or 11 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 Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid 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 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business 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** – <u>How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?</u> "(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, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

Table IV – 1b: NESHAP Subpart ZZZZ - RICE MACT	
	(1) There is no time limit on the use of emergency stationary RICE in emergency situations. (2) You may operate your emergency stationary RICE for the purposes specified in paragraphs (f)(2)(i) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2). (i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. (ii)–(iii) [Reserved]" **[Reference: 40 CFR §63.6640 (f)(1 & 2)]** (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 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. (i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial

Table IV – 1b: NESHAP Subpart ZZZZ - RICE MACT	
	arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system. (ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: (A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator. (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. (C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. (D) The power is provided only to the facility itself or to support the local transmission and distribution system. (E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator." **[Reference: 40 CFR §63.6640 (f)(4)]**
1b.4	**Record Keeping Requirements:** **Control of HAPs** **§63.6655** – What records must I keep? (d) You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.

Table IV – 1b: NESHAP Subpart ZZZZ - RICE MACT	
	(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; (1) *Not Applicable*. (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)(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. (1) *Not Applicable*. (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.
1b.5	**<u>Reporting Requirements</u>:** **<u>Control of HAPs</u>** 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

Table IV – 1b: NESHAP Subpart ZZZZ - RICE MACT	
	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. **[Reference: 40 CFR 63 Subpart ZZZZ – Footnote 2, Table 2d]**

Table IV – 2	
2.0	**Emissions Unit Number(s): EU-7 thru EU-10, EU-12 thru EU-13 & EU-15 and EU-16** **EU-7:** One (1) 34.5 MMBtu/hr. Erie City Keystone natural gas fired boiler **[MDE ARA Reg No. 5-1093]** **EU-8**: One (1) 34.5 MMBtu/hr. Erie City Keystone natural gas fired boiler [**MDE ARA Reg No. 5-1092]** **EU-9**: One (1) 41.6 MMBtu/hr. Cleaver Brooks model D-52 natural gas fired boiler **[MDE ARA Reg No. 5-1096]** **EU-10**: One (1) 6.3 MMBtu/hr. Cleaver Brooks model 700-150 natural gas fired boiler **[MDE ARA Reg No. 5-1097]** **EU-12**: One (1) 7.0 MMBtu/hr. Total Energy Resources natural gas fired heater **[MDE ARA Reg No. 5-1694]** **EU-13**:One (1) 7.0 MMBtu/hr. Total Energy Resources natural gas fired heater **[MDE ARA Reg No. 5-1695]** **EU-15**: One (1) 7.5 MMBtu/hr. Columbia natural gas fired heater **[MDE ARA Reg No. 5-2270]** **EU-16**: One (1) 7.5 MMBtu/hr. Columbia natural gas fired heater **[MDE ARA Reg No. 5-2271]**
2.1	**Applicable Standards/Limits:** **A. Control of Visible Emissions** **COMAR 26.11.09.05** – Visible Emissions.

Table IV – 2

A. 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."

B. <u>Control of Nitrogen Osides</u>

COMAR 26.11.09.08F. – <u>Requirements for Space Heaters.</u>

"(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 NOx 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

Table IV – 2	
	(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. **Note ***: A Department sponsored program can be a Company in-house training program if approved by the Department. Washington Gas shall satisfy this requirement through use of an approved in-house training program.
2.2	**<u>Testing Requirements</u>:** **A. <u>Control of Visible Emissions</u>** See Monitoring Requirements **B. <u>Control of Nitrogen Oxides</u>** See Monitoring Requirements
2.3	**<u>Monitoring Requirements:</u>** **A. <u>Control of Visible Emissions</u>** The Permittee shall keep the equipment in good working order and properly maintained as to assure compliance with the visible emissions requirements. **[Reference: COMAR 26.11.03.06C]** **B. <u>Control of Nitrogen Oxides</u>** The Permittee shall develop and maintain an operating and maintenance plan to minimize NO_X emissions. **[Reference: COMAR 26.11.09.08F]**
2.4	**<u>Record Keeping Requirements</u>:** **A. <u>Control of Visible Emissions</u>** See Reporting Requirements

Table IV – 2	
	B. <u>Control of Nitrogen Oxides</u> The Permittee shall: Maintain monthly records of the amounts and type of fuels burned and the hours of operation of each boiler. Maintain records of attendance for operator training program for each operator. Maintain records of any equipment malfunctions, repairs and preventative maintenance performed. **[Reference: COMAR 26.11.03.06C & COMAR 26.11.09.08F]**
2.5	**<u>Reporting Requirements</u>:** **A. <u>Control of Visible Emissions</u>** The Permittee shall report any periods of visible emissions in accordance with Section III, Condition 4 - “Report of Excess Emissions and Deviations.” **B. <u>Control of Nitrogen Oxides</u>** The Permittee shall submit along with the annual emissions certification, monthly fuel use records and calculations verifying that the facility still meets the requirements of a "Space Heater" as defined in Condition 1.1B. **[Reference: COMAR 26.11.03.06C**]

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. 5 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.

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

(3) No. 1 Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

The ***affected unit*** is 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.

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

(a) ✓ Storage of butane, propane, or liquefied petroleum, or natural gas;

(b) No. 12 Storage of lubricating oils;

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

(d) No. 1 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;

(5) ✓ 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;

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

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

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

For the following, attach additional pages as necessary:

(9) 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. 4 Makeup air heaters

No. 2 Water heaters

No. 2 Underground odorant storage tanks; emissions controlled by flare.

No. 1 Hexane Storage and Gas Conditioning System (including four (4) 30,000-gallon hexane tanks)

SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

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

Applicable Regulations:

COMAR 26.11.06.08 – Nuisance.
"An installation or premises may not be operated or maintained in such a manner that a nuisance or air pollution is created. Nothing in this regulation relating to the control of emissions may in any manner be construed as authorizing or permitting the creation of, or maintenance of, nuisance or air pollution."

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."

Washington Gas
A WGL Company

6801 Industrial Rd.
Springfield, VA 22151
www.washingtongas.com

June 28, 2023

Suna Sariscak
Air and Radiation Management Administration
Maryland Department of the Environment
1800 Washington Boulevard, Suite 720
Baltimore, Maryland 21230-1720

Subject: **Washington Gas – Rockville Station (Part 70 Operating Permit No. 24-031-1951) Title V Renewal Application**

Dear Ms. Sariscak,

We are submitting this timely and complete Title V renewal application prior to June 30, 2023, as required by COMAR 26.11.03.02B(3) and COMAR 26.11.03.02E of the Title V Operating Permit for Washington Gas Company's Rockville Station. Please find attached the completed application package including all required attachments and state-only enforceable requirement form.

Facility Information
Washington Gas - Rockville Station
7301 Westmore Rd, Rockville, MD 20850
Plant Manager: Marcus Fortune
Phone: (703) – 750-5693
24-Hour: (703) 750-4831 (Dispatch) or (703) 750-4371 (Gas Control)

If you have any questions concerning this application, please contact Melissa Wilson of my office at (703) 750-7568 or environment@washgas.com.

Sincerely,

Kevin Murphy
VP Asset Management, Engineering and Supply
Washington Gas
6801 Industrial Rd. Springfield, VA 22151
(703) 750-4727

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

PART 70 PERMIT APPLICATION FOR RENEWAL

AIR AND RADIATION 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: Washington Gas Light Company		
Street Address: 6801 Industrial Road		
City: Springfield	State: VA	Zip Code: 22151
Telephone Number: 703-750-4727	Fax Number:	

Facility Information:

Name of Facility: Washington Gas – Rockville Station		
Street Address: 7301 Westmore Road		
City: Rockville	State: MD	Zip Code: 20850
Plant Manager: Marcus Fortune	Telephone Number: (703) 750 -5693	Fax Number:
24-Hour Emergency Telephone Number for Air Pollution Matters: 703-750-4831 (Dispatch) 703-750-4371 (Gas Control)		

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

SECTION 1. CERTIFICATION STATEMENTS

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

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

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

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

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

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

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

4. Risk Management Plan Compliance

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

[ ] has been submitted;

[ ] will be submitted at a future date; or

[X] does not need to be submitted.

5. Statement of Truth, Accuracy, and Completeness

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

RESPONSIBLE OFFICIAL:

x 

SIGNATURE DATE

Kevin Murphy

PRINTED NAME

VP Asset Management, Engineering and Supply

TITLE

SECTION 2. FACILITY DESCRIPTION SUMMARY

1. Major Activities of Facility

Briefly describe the major activities, including the applicable SIC Code(s) and end product(s).

Rockville Station is a natural gas and propane peaking and storage facility. The station provides supplemental fuel to maintain the pressure in the distribution system during peak demand, which typically occurs during the winter months. In addition, the station may be used in emergency situations, such as system upset or failures that may occur during off peak times of the year. The station typically operates about 10 days per year. Emissions units at the site consist of five 1,200 hp Worthington compressor engines, one 2,000 hp Ingersoll Rand compressor engine, four natural gas-fired steam boilers, one 1,462 hp emergency generator and four natural gas-fired line heaters. The end product is fuel delivered to the Washington Gas distribution pipeline. The facility's SIC code is 4924.

2. Facility-Wide Emissions

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

☐ Actual Major
☑ Potential Major
☐ Solid Waste Incineration Unit Requiring Permit Under § 129(e) of CAA

B. List the actual facility-wide emissions below: **2022 emissions provided (tpy)**

PM10 **0.096** NOx **8.522** VOC **0.381** SOx **0.0316** CO **4.503**
HAPs **0.0489 (formaldehyde)**

3. Included With the Application:

- Flow Diagrams showing all emissions units, emission points, and control devices.
- Plot Plan
- Emissions Certification Report (2022 Submittal)
- Annual Emissions Certification Report (2022 Submittal)
- Renewal Application Checklist

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 1 1a. Date of installation (month/year): 8/1952	2. MDE Registration No.: (if applicable) 9-0592

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

Unit: Worthington Compressor #1, One Emission Point: S1

SCC Number: 2-02-002-02

Model: UTC-16-6

Serial No.: G-2020

Output: 1,200 hp

This unit is used to compress natural gas from the wholesale suppliers, Columbia Gas and Williams Transco. The gas is then stored at high pressure in underground bottles for use during peak demand periods. This unit also compresses air for mixing with propane vapor. The compressor is in the engine room of the compressor building.

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

General Reference: _____NA_____

Continuous Processes: __24_____hours/day __365_____days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 125 mmcf/yr
2.			**2022**: 0.719 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: __ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx **0.572** CO **0.0449** SOx **2.27E-04** VOC **0.017** PM10 **1.08E-05** HAPs **7.4E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 2 1a. Date of installation (month/year): 8/1952	2. MDE Registration No.: (if applicable) 9-0593

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

Unit: Worthington Compressor #2, One Emission Point: S2

SCC Number: 2-02-002-02

Model: UTC-16-6

Serial No.: G-2021

Output: 1,200 hp

This unit is used to compress natural gas from the wholesale suppliers, Columbia Gas and Williams Transco. The gas is then stored at high pressure in underground bottles for use during peak demand periods. This unit also compresses air for mixing with propane vapor. The compressor is located in the engine room of the compressor building.

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

General Reference NA

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0	**potential**: 125 mmcf/yr
2.		**2022**: 0.695 mmcf/yr
3.		

6. Emissions in Tons:

A. Actual Major: _Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **5.51E-01** CO: **4.49E-02** SOx: **2.19E-04** VOC: **1.64E-02** PM10: **1.04E-05** HAPs: **7.13E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 3 1a. Date of installation (month/year): 8/1952	2. MDE Registration No.: (if applicable) 9-0594

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

Unit: Worthington Compressor #3, One Emission Point: S3

SCC Number: 2-02-002-02

Model: UTC-16-6

Serial No. G-2022

Output: 1,200 hp

This unit is used to compress natural gas from the wholesale suppliers, Columbia Gas and Williams Transco. The gas is then stored at high pressure in underground bottles for use during peak demand periods. This unit also compresses air for mixing with propane vapor. The compressor is located in the engine room of the compressor building.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: __24_____hours/day __365_____days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0	**Potential**: 125 mmcf/yr
2.		**2022**: 0.731 mmcf/yr
3.		

6. Emissions in Tons:

A. Actual Major: __ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx:**5.58E-01** CO: **4.57E-02** SOx: **2.30E-04** VOC: **1.73E-02** PM10: **1.10E-05** HAPs: **7.52E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 4 1a. Date of installation (month/year): 8/1952	2. MDE Registration No.: (if applicable) 9-0595

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

Unit: Worthington Compressor #4, One Emission Point: S4

SCC Number: 2-02-002-02

Model: UTC-16-6

Serial No: G-2023

Output: 1,200 hp

This unit is used to compress natural gas from the wholesale suppliers, Columbia Gas and Williams Transco. The gas is then stored at high pressure in underground bottles for use during peak demand periods. This unit also compresses air for mixing with propane vapor. The compressor is located in the engine room of the compressor building.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: __24_____hours/day __365_____days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0	**Potential**: 125 mmcf/yr
2.		**2022**: 0.709 mmcf/yr
3.		

6. Emissions in Tons:

A. Actual Major: __ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **5.64E-01** CO: **4.43E-02** SOx: **2.23E-04** VOC: **1.68E-02** PM10: **1.07E-05** HAPs: **7.29E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 5 1a. Date of installation (month/year): 7/1962	2. MDE Registration No.: (if applicable) 9-0597

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

Unit: Worthington Compressor #5, One Emission Point: S5

SCC Number: 2-02-002-02

Model: UTC-16-6

Serial No.: G-2536

Output: 1,200 hp

This unit is used to compress air from the atmosphere for mixing of propane vapor.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: __24_____hours/day __365_____days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	natural gas	0	**potential**: 125 mmcf/yr
2.			**2022:** 0.282 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **2.32E-01** CO: **1.83E-02** SOx: **9.21E-05** VOC: **6.91E-03** PM10: **4.39E-06** HAPs: **3.01E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 6 1a. Date of installation (month/year): 12/1971	2. MDE Registration No.: (if applicable) 9-0596

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

Unit: Ingersoll Rand Compressor #6, Two Emission Points: S6 & S6A

SCC Number: 2-02-002-02

Model: 412-KVS

Serial No.: 412-FT-583

Output: 2,000 hp

This unit is used to compress air from the atmosphere for mixing of propane vapor

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 207.8 mmcf/yr
2.			**2022**: 0.488 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **4.02E-01** CO: **3.16E-02** SOx: **1.59E-04** VOC: **1.19E-02** PM10: **7.59E-06** HAPs: **5.20E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 7 1a. Date of installation (month/year): 5/1964	2. MDE Registration No.: (if applicable) 5-1093

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

Unit: Erie City Iron Works Boiler #6, One Emission Point: S7

SCC Number: 1-03-006-02

Model: SG-21

Serial No.: 96648; NATIONAL BOARD NO. 0016861

Specifications:

maximum pressure = 299 lbs,

steaming capacity = 26,000 lb/hr

35.2 mmbtu/hr input

heating surface boiler = 2,820 sq ft

This unit is used to preheat the compressed natural gas to avoid problems with low gas temperatures in the distribution lines. Where propane is substituted for natural gas, the unit is used to vaporize it.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 280.3 mmcf/yr
2.			**2022**: 0.945 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: _ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **1.82E-01** CO: **1.53E-01** SOx: **1.09E-03** VOC: **1.00E-02** PM10: **3.47E-03** HAPs: **1.37E-04**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 8 1a. Date of installation (month/year): 9/1968	2. MDE Registration No.: (if applicable) 5-1092

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

Unit: Erie City Works Boiler #8, One Emission Point: S8

SCC Number: 1-03-006-02

Serial No.: 97777; NATIONAL BOARD NO. 0017650

Model: SG-21

Specifications:

maximum pressure = 200 lbs

steaming capacity = 26,000 lb/hr

34.5 mmbtu/hr input

heating surface boiler = 2,820 sqft

This unit is used to preheat the compressed natural gas to to avoid problems with low gas temperatures in the distribution lines. Where propane is substituted for natural gas, the unit is used to vaporize it.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: __24_____hours/day __365_____days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 274.7 mmcf/yr
2.			**2022**: 6.605 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: _Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **1.31** CO: **1.10** SOx: **7.84E-03** VOC: **7.19E-02** PM10: **2.48E-02** HAPs: **9.81E-04**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 9 1a. Date of installation (month/year): 11/1982	2. MDE Registration No.: (if applicable) 5-1096

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

Unit: Cleaver Brooks Boiler #9, One Emission Point: S9

SCC Number: 1-03-006-02

Model: Cleaver Brooks D-52

Serial No.: WL-3135; NATIONAL BOARD NO. 0053140

Specifications:

Maximum pressure = 260 lbs

Steam capacity = 32,000 lbs/hr

41.6 mmbtu/hr input

Heating surface boiler = 2,407 sqft

This unit is used to preheat the compressed natural gas to to avoid problems with low gas temperatures in the distribution lines. Where propane is substituted for natural gas, the unit is used to vaporize it.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: __24_____hours/day __365_____days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0	**potential**: 330.2 mmcf/yr
2.		**2022**: 16.06 mmcf/yr
3.		

6. Emissions in Tons:

A. Actual Major: _Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **3.10** CO: **2.60** SOx: **1.86E-02** VOC: **1.71E-01** PM10: **5.89E-02** HAPs:

2.33E-03

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 10 1a. Date of installation (month/year): 11/1991	2. MDE Registration No.: (if applicable) 5-1097

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

Unit: Cleaver Brooks Boiler #10, One Emission Point: S10

SCC Number: 1-03-006-03

Model: Cleaver Brooks CB-700-150

Serial No.: L89077

Specifications:

6.3 mmbtu/hr input

Steam capacity = 5,175 lb/hr

Used to reactivate natural gas dryers.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: __24_____hours/day __365_____days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0	**potential**: 50 mmcf/yr
2.		**2022**: 0.023 mmcf/yr
3.		

6. Emissions in Tons:

A. Actual Major: Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **4.34E-03** CO: **3.65E-03** SOx: **2.60E-05** VOC: **2.39E-04** PM10: **8.25E-05** HAPs: **3.26E-06**

1. Emissions Unit No.: 12 1a. Date of installation (month/year): 11/2003	2. MDE Registration No.: (if applicable) 5-1694

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

Unit: Westmore Line Heater #1, One Emission Point: S12

SCC Number: 1-03-006-03

Make: Total Energy Resources

Specification: 7.0 mmbtu/hr input

The gas is preheated before pressure reduction to avoid freezing issues in the distribution lines.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: __24_____hours/day __365_____days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 60.1 mmcf/yr
2.			**2022**: 1.18 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: __ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **4.76E-02** CO: **4.00E-02** SOx: **2.85E-04** VOC: **2.62E-03** PM10: **9.04E-04** HAPs: **4.44E-05**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 13 1a. Date of installation (month/year): 11/2003	2. MDE Registration No.: (if applicable) 5-1695

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

Unit: Westmore Line Heater #2, One Emission Point: S13

SCC Number: 1-03-006-03

Make: Total Energy Resources

Specification:

7.0 mmbtu/hr input

The gas is preheated before pressure reduction to avoid freezing issues in the distribution lines.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: __24_____hours/day __365_____days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 60.1 mmcf/yr
2.			**2022:** 0.952 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: _ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **5.92E-02** CO: **4.97E-02** SOx: **3.55E-04** VOC: **3.25E-03** PM10: **1.12E-03** HAPs: **3.57E-05**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 14 1a. Date of installation (month/year): 7/2005	2. MDE Registration No.: (if applicable) 9-0800

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

Unit: Emergency Generator, One Emission Point: S14

SCC Number: 1-03-006-03 1462 HP OUTPUT

Make: Caterpillar

Model No.: G3516 LE

This emission unit is an emergency generator and will not be operated for more than 500 hours per year.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: __24_____hours/day __365_____days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0	**potential**: 5.6 mmcf/yr*
2.		*Based on 7784 BTU/bhp-hr at 100% load, 1020 BTU/scf, 500 hrs/yr
3.		**2022**: 0.231 mmcf/yr

6. Emissions in Tons:

A. Actual Major: __ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **5.84E-01** CO: **4.59E-02** SOx: **2.32E-04** VOC: **1.74E-02** PM10: **1.10E-05** HAPs: **7.56E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 15 1a. Date of installation (month/year): 11/2011	2. MDE Registration No.: (if applicable) 5-2270

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

Unit: Columbia Line Heater #1, One Emission Point: S15

SCC Number: 1-03-006-03

Make: National Combustion Company

Specification: 7.5 mmbtu/hr input

The gas is preheated before pressure reduction to avoid freezing issues in the distribution lines.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: __24_____hours/day __365_____days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0	**potential**: 60.1 MMCF/YR
2.		**2022**: 3.82 mmcf/yr
3.		

6. Emissions in Tons:

A. Actual Major: __Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **1.91E-01** CO: **1.61E-01** SOx: **1.15E-03** VOC: **1.05E-02** PM10: **3.63E-03** HAPs: **1.43E-04**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 16 1a. Date of installation (month/year): 11/2011	2. MDE Registration No.: (if applicable) 5-2271

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

Unit: Columbia Line Heater #2, One Emission Point: S16

SCC Number: 1-03-006-03

Make: NATIONAL COMBUSTION COMPANY

Specification:

7.5 mmbtu/hr input

The gas is preheated before pressure reduction to avoid freezing issues in the distribution lines.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: __24_____hours/day __365_____days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 60.1 mmcf/yr
2.			**2022**: 2.85 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: __Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **1.42E-01** CO: **1.20E-01** SOx: **8.54E-04** VOC: **7.83E-03** PM10: **2.70E-03** HAPs: **1.07E-04**

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

Emissions Unit No.: 1, 2, 3, 4, 5, 6, & 14 **General Reference:** COMAR 26.11.09.05E

Briefly describe the Emission Standard/Limit or Operational Limitation:

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

(3) Emissions During Operating Mode. A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.

(4) Exceptions:

(a) Section E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.

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

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

(ii) All other engines: 15 minutes.

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

Compliance Demonstration:

Check appropriate reports required to be submitted:

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

Methods used to demonstrate compliance:

Monitoring: Reference_ NOT APPLICABLE **Describe**: _____

_____

Testing: Reference NOT APPLICABLE **Describe**: _____

_____

Recordkeeping: Reference NOT APPLICABLE **Describe**: _____

_____

Reporting: Reference: Plant wide conditions **Describe**: Report any periods of visible emissions in accordance with Section III, Condition 4 – "Report of Excess Emissions and Deviations", of the permit.

Frequency of submittal of the compliance demonstration: Annually

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

Emissions Unit No.: 1, 2, 3, 4, 5, 6, & 14 **General Reference:** COMAR 26.11.09.08G

Briefly describe the Emission Standard/Limit or Operational Limitation:

(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.

** A Department sponsored program can be a Company in-house training program if approved by the Department. Washington Gas shall satisfy this requirement through use of an approved in-house training program.*

Compliance Demonstration:

Check appropriate reports required to be submitted:

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

Methods used to demonstrate compliance:

Monitoring: Reference_ COMAR 26.11.03.06C and 26.11.09.08G **Describe**: Perform engine maintenance and inspections in accordance with manufacturer's recommendations and the operations and maintenance plan. Engine inspections, tuning, and adjustments shall be performed by a qualified mechanic and in accordance with the engines manufacturers' recommendations.

Testing: Reference COMAR 26.11.09.08G **Describe**: 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

Recordkeeping: Reference COMAR 26.11.03.06C, 26.11.09.08G **Describe**: Maintain monthly records of the amounts and types of fuels burned and the hours of operation of each compressor or generator engine. Maintain records of any equipment malfunctions, repairs and preventative maintenance performed as they relate to combustion performance. Maintain a record of the results of any combustion analysis performed for at least 2 years (as required for engines operating 500 hr per year or more) and make available to the Department or EPA upon request. Maintain a record of the in-house training program attendance for each operator at the site and make these records available to the Department upon request.

Note: (For EU #6 and 14, only) Records shall include the reason for the emergency generator operation (i.e., maintenance, operational testing, or power outage, etc.)

Reporting: Reference COMAR 26.11.03.06C Describe: Submit along with the annual emissions certification the monthly fuel use records and generator operating hour records and certification of the capacity factor and/or the results of the combustion analysis (as required).

Frequency of submittal of the compliance demonstration: Semi-Annually

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

Emissions Unit No.: __7,8,9,10,12,13,15,16__ **General Reference:** _COMAR 26.11.09.05A(2) & (3)

Briefly describe the Emission Standard/Limit or Operational Limitation:

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.

EXCEPTIONS: Section A (1) and (2) of COMAR 26.11.09.05 do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:

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

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

Compliance Demonstration:

Check appropriate reports required to be submitted:

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

Methods used to demonstrate compliance:

Monitoring: Reference_ COMAR 26.11.03.06C Describe: Keep the equipment in good working order and properly maintained as to assume compliance with the visible emissions requirements.

Testing: Reference NOT APPLICABLE **Describe**: _____
_____

Recordkeeping: Reference NOT APPLICABLE **Describe**: _____
_____

Reporting: Reference: Plant wide conditions **Describe**: Report any periods of visible emissions in accordance with Section III, Condition 4 – "Report of Excess Emissions and Deviations", of the permit

Frequency of submittal of the compliance demonstration: Semi-Annually

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

Emissions Unit No.: 7,8,9,10,12,13,15,16 **General Reference:** COMAR 26.11.09.08F

Briefly describe the Emission Standard/Limit or Operational Limitation:

"Space heaters" are defined as a source whose equipment 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 and located at a potential major source of NOx emissions to:

(1) A person who owns or operates a space heater 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 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.

**A Department sponsored program can be a Company or in house training program if approved by the Department. Washington Gas shall satisfy this requirement through use of their approved in-house training program*

(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.

Compliance Demonstration:

Check appropriate reports required to be submitted:

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

Methods used to demonstrate compliance:
Monitoring: Reference: COMAR 26.11.03.06C and COMAR 26.11.09.08F **Describe**: Develop and maintain an operating and maintenance plan to minimize NOx emissions. Keep equipment in good working order and properly maintained as to assure compliance with visible emissions requirements. _____ **Testing**: Reference NOT APPLICABLE **Describe**: _____ _____ **Recordkeeping**: Reference COMAR 26.11.03.06C & 26.11.09.08F **Describe**: Maintain monthly records of the amounts and type of fuels burned and the hours of operation of each boiler. Maintain records of attendance for operator training programs for each operator. Maintain records of any equipment malfunctions, repairs and preventative maintenance performed. **Reporting**: Reference COMAR 26.11.03.06C **Describe**: Submit along with the annual emissions certification monthly fuel use records and calculations verifying that the facility still meets the requirements of a "Space Heater" as defined in Condition 1.1B.

Frequency of submittal of the compliance demonstration: Semi-Annually, Annually

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

Emissions Unit No.: 1,2,3,4,5 **General Reference:** 40 CFR 63 Subpart ZZZZ

Briefly describe the Emission Standard/Limit or Operational Limitation:

Startup. During startup, minimize engine idle and limit startup period to less than 30 minutes

Maintenance: Oil Filters. Change oil and filter every 4,320 hours (180 days) of operation or annually, whichever comes first OR use oil change analysis program to extend oil change frequencies per 40 CFR 63.6625(i)

Maintenance: Spark Plugs. Inspect spark plugs every 4,320 hours (180 days) of operation or annually, whichever comes first

Maintenance: Hoses and Belts. Inspect all hoses and belts every 4,320 hours (180 days) of operations or annually, whichever comes first

Maintenance: General. Operate and maintain RICE according to manufacturer's instructions or implement a maintenance plan that provides for the maintenance and operation in a manner consistent with good air pollution control practices for minimizing emissions, per 40 CFR 63.6625(e)(5).

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 NOT APPLICABLE **Describe**: _____

_____

Testing: Reference NOT APPLICABLE **Describe**: _____

_____

Recordkeeping: Reference: 40 CFR 63.6655 **Describe:** Maintain records to show that required work practices have been met.

Reporting: Reference: NOT APPLICABLE **Describe**: _____

_____

Frequency of submittal of the compliance demonstration: Semi-Annually, Annually

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

Emissions Unit No.: 6, 14 **General Reference:** 40 CFR 63 Subpart ZZZZ

Briefly describe the Emission Standard/Limit or Operational Limitation:

Startup. During startup, minimize engine idle and limit startup period to less than 30 minutes

Maintenance: Oil Filters. Change oil and filter every 500 hours of operation or annually, whichever comes first OR use oil change analysis program to extend oil change frequencies per 40 CFR 63.6625(j)

Maintenance: Spark Plugs. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first. Replace as necessary.

Maintenance: Hoses and Belts. Inspect all hoses and belts every 500 hours of operations or annually, whichever comes first

Maintenance: General. Operate and maintain RICE according to manufacturer's instructions or implement a maintenance plan that provides for the maintenance and operation in a manner consistent with good air pollution control practices for minimizing emissions, per 40 CFR 63.6625(e)(5).

Operation: If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs 40 CFR 63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs 40 CFR 63.6640(f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs 40 CFR 63.6640(f)(1) through (2) and (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) You may operate your emergency stationary RICE for the purposes specified in paragraphs 40 CFR 63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs 40 CFR 63.6640(f)(3) and (4) counts as part of the 100 hours per calendar year allowed by this paragraph.

(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 40 CFR 63.6640(f)(2) . Except as provided in paragraphs 40 CFR 63.6640(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.

(ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

A. The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

B. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

C. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

D. The power is provided only to the facility itself or to support the local transmission and distribution system.

E. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

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: Reference: 40 CFR 63.6625(f) _ **Describe**: Install a non-resettable hour meter

_____

Testing: Reference NOT APPLICABLE **Describe**: _____

_____

Recordkeeping: Reference: 40 CFR 63.6655(e) and (f) **Describe:** Maintain records of maintenance conducted. Maintain hours & purpose for operation.

Reporting: Reference: 40 CFR 63 Subpart ZZZZ – Footnote 2 of Table 2d **Describe**: 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.

Frequency of submittal of the compliance demonstration: Semi-Annually

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

Emissions Unit No.: __Plantwide_ **General Reference**: COMAR 26.11.01.07 & 26.11.03.06C(7)

Briefly describe the Emission Standard/Limit or Operational Limitation:

REPORT OF EXCESS EMISSIONS AND DEVIATIONS: The facility shall comply with the following conditions for occurrences of excess emissions and deviations from requirements of the permit:

a. Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation.
b. Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence.
c. When requested by the Department, report all deviations from permit conditions, including those attributed to malfunctions, within 5 days of the request by submitting a written description with the required information.
d. Submit semi-annual monitoring reports that confirm all required monitoring was performed, and provide accounts of all deviations from permit requirements that occurred. Each account should include the necessary information as stated in the reference. 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, submit a written report with the information required in COMAR 26.11.01.07C(2) within 10 days of receiving the request concerning the occurrence of excess emissions.

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 __NOT APPLICABLE **Describe**: _____
_____

Testing: Reference __NOT APPLICABLE **Describe**: _____
_____

Recordkeeping: Reference ___As required **Describe**: _____
_____

Reporting: Reference __As required **Describe**: _____
_____

Frequency of submittal of the compliance demonstration: Semi-annually

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

Emissions Unit No.: __Plantwide_ **General Reference**: COMAR 26.11.01.05-1, 26.11.02.19C & 26.11.02.19D

Briefly describe the Emission Standard/Limit or Operational Limitation:

EMISSIONS CERTIFICATION REPORT: The facility shall certify actual annual emissions of regulated pollutants from the facility on a calendar year basis, not later than April 1 of the year following the year for which the certification is required.

Permit Shield Request: __June 30, 2023_____

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 _NOT APPLICABLE **Describe**: _____
_____
_____

Testing: Reference NOT APPLICABLE **Describe**: _____
_____
_____

Recordkeeping: Reference ___As required **Describe**: _Report records maintained by submitter._____
_____
_____

Reporting: Reference ____As required_ **Describe**: _____
_____
_____

Frequency of submittal of the compliance demonstration: _Annually

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

Emissions Unit No.: __Plantwide_ **General Reference**: COMAR 26.11.03.06G(6) and (7)

Briefly describe the Emission Standard/Limit or Operational Limitation:

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

Permit Shield Request: __June 30, 2023_____

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 _NOT APPLICABLE **Describe**: _____

Testing: Reference _NOT APPLICABLE **Describe**: _____

Recordkeeping: Reference ___As required **Describe**: _Report records maintained by submitter.

Reporting: Reference ___As required **Describe**: _____

Frequency of submittal of the compliance demonstration: Annually

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

Emissions Unit No.: __Plantwide_ **General Reference**: COMAR 26.11.03.06C(5) & (6)

Briefly describe the Emission Standard/Limit or Operational Limitation:

GENERAL RECORDKEEPING: 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

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 _NOT APPLICABLE **Describe**: _____
_____
_____

Testing: Reference NOT APPLICABLE **Describe**: _____
_____
_____

Recordkeeping: Reference _As required **Describe**: _Maintenance/repair log, training logs, and oil analysis records available upon request at the facility._____
_____

Reporting: Reference NOT APPLICABLE **Describe**: _____
_____
_____

Frequency of submittal of the compliance demonstration: Annually

SECTION 3D. ALTERNATE OPERATING SCENARIOS

Emissions Unit No.: N/A

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

NOT APPLICABLE

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

Scenario No.: _____

Emissions Unit No.: _____ General Reference: _____

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

NOT APPLICABLE

Compliance Demonstration

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference _____ Describe: _____

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: _____

SECTION 4. CONTROL EQUIPMENT

1. Associated Emissions Units No. : NOT APPLICABLE	2. Emissions Point No.: NOT APPLICABLE

3. Type and Description of Control Equipment:
NOT APPLICABLE

4. Pollutants Controlled:	Control Efficiency:

5. Capture Efficiency:

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

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

Pollutant					
CAS Number					
Emissions Unit #	Not required	Not required	Not required	Not required	Not required
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions					
Total	Not required	Not required	Not required	Not required	Not required

NOTE: THIS PAGE IS PROVIDED FOR INFORMATION ONLY. WASHINGTON GAS IS NOT ATTEMPTING TO VERIFY COMPLIANCE WITH A PLANT-WIDE EMISSION LIMIT, CLAIM ANY EXEMPTION, OR RESOLVE A DISPUTE (AS DESCRIBED IN THE INSTRUCTIONS.)

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

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

1. Applicable Requirement:

NOT APPLICABLE

2. Brief Description:

_____

_____

_____

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

_____

_____

_____

_____

_____

SECTION 7. COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS

1. Emissions Unit #	Anticipated Compliance Date
NOT APPLICABLE	
Applicable Federally Enforceable Requirement being Violated:	

2. Description of Plan to Achieve Compliance:
_____
_____
_____
_____
_____
_____

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

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STATE-ONLY ENFORCEABLE REQUIREMENTS

Facility Information:

Name of Facility: Washington Gas Rockville Station County: Montgomery
Premises Number: 15-1591
Street Address: 7301 Westmore Rd Rockville, MD 20850
24-hour Emergency Telephone Number for Air Pollution Matters: (703)750-4831 (Dispatch) (703)750-4371 (Gas Operations)
Type of Equipment (List Significant Units):
5 – Worthington Compressors (1,200 hp)
1 – Ingersoll Rand Compressor (2,000 hp)
2 – Erie City Boilers (35.2 and 34.5 mmbtu/hr input)
2 – Cleaver Brooks Boilers (41.6 and 6.3 mmbtu/hr input)
2 – Natural Gas Line Heaters (7.0 mmbtu/hr input)
2 – Natural Gas Line Heaters (7.5 mmbtu/hr input)
1 – Emergency Generator (1,462 hp)

CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY ENFORCEABLE REQUIREMENTS

Registration No.: Plantwide

Emissions Unit No.: Plantwide **General Reference:** COMAR 26.11.06.08 & 09

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

COMAR 26.11.06.08 prohibits the operation or maintenance of an installation or premises in such a manner that a nuisance or air pollution is created.

COMAR 26.11.06.09 prohibits the discharge into the atmosphere of gases, vapors, or odors beyond the property line in such a manner that a nuisance or air pollution is created.

Methods used to demonstrate compliance:

GENERALLY APPLICABLE

SECTION 1. CERTIFICATION STATEMENTS

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

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

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

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

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

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

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

4. Risk Management Plan Compliance

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

[ ] has been submitted;

[ ] will be submitted at a future date; or

[X] does not need to be submitted.

5. Statement of Truth, Accuracy, and Completeness

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

RESPONSIBLE OFFICIAL:

X_____

SIGNATURE DATE

Kevin Murphy

PRINTED NAME

VP Asset Management, Engineering and Supply

TITLE

SECTION 2. FACILITY DESCRIPTION SUMMARY

1. Major Activities of Facility

Briefly describe the major activities, including the applicable SIC Code(s) and end product(s).

Rockville Station is a natural gas and propane peaking and storage facility. The station provides supplemental fuel to maintain the pressure in the distribution system during peak demand, which typically occurs during the winter months. In addition, the station may be used in emergency situations, such as system upset or failures that may occur during off peak times of the year. The station typically operates about 10 days per year. Emissions units at the site consist of five 1,200 hp Worthington compressor engines, one 2,000 hp Ingersoll Rand compressor engine, four natural gas-fired steam boilers, one 1,462 hp emergency generator and four natural gas-fired line heaters. The end product is fuel delivered to the Washington Gas distribution pipeline. The facility's SIC code is 4924.

2. Facility-Wide Emissions

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

☐ Actual Major
☑ Potential Major
☐ Solid Waste Incineration Unit Requiring Permit Under § 129(e) of CAA

B. List the actual facility-wide emissions below: **2022 emissions provided (tpy)**

PM10 **0.096** NOx **8.522** VOC **0.381** SOx **0.0316** CO **4.503**
HAPs **0.0489 (formaldehyde)**

3. Included With the Application:

- Flow Diagrams showing all emissions units, emission points, and control devices.
- Plot Plan
- Emissions Certification Report (2022 Submittal)
- Annual Emissions Certification Report (2022 Submittal)
- Renewal Application Checklist

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 1 1a. Date of installation (month/year): 8/1952	2. MDE Registration No.: (if applicable) 9-0592

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

Unit: Worthington Compressor #1, One Emission Point: S1

SCC Number: 2-02-002-02

Model: UTC-16-6

Serial No.: G-2020

Output: 1,200 hp

This unit is used to compress natural gas from the wholesale suppliers, Columbia Gas and Williams Transco. The gas is then stored at high pressure in underground bottles for use during peak demand periods. This unit also compresses air for mixing with propane vapor. The compressor is in the engine room of the compressor building.

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

General Reference: _____NA_____

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 125 mmcf/yr
2.			**2022**: 0.719 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: __ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx **0.572** CO **0.0449** SOx **2.27E-04** VOC **0.017** PM10 **1.08E-05** HAPs **7.4E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 2 1a. Date of installation (month/year): 8/1952	2. MDE Registration No.: (if applicable) 9-0593

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

Unit: Worthington Compressor #2, One Emission Point: S2

SCC Number: 2-02-002-02

Model: UTC-16-6

Serial No.: G-2021

Output: 1,200 hp

This unit is used to compress natural gas from the wholesale suppliers, Columbia Gas and Williams Transco. The gas is then stored at high pressure in underground bottles for use during peak demand periods. This unit also compresses air for mixing with propane vapor. The compressor is located in the engine room of the compressor building.

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

General Reference NA

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 125 mmcf/yr
2.			**2022**: 0.695 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: _Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **5.51E-01** CO: **4.49E-02** SOx: **2.19E-04** VOC: **1.64E-02** PM10: **1.04E-05** HAPs: **7.13E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 3 1a. Date of installation (month/year): 8/1952	2. MDE Registration No.: (if applicable) 9-0594

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

Unit: Worthington Compressor #3, One Emission Point: S3

SCC Number: 2-02-002-02

Model: UTC-16-6

Serial No. G-2022

Output: 1,200 hp

This unit is used to compress natural gas from the wholesale suppliers, Columbia Gas and Williams Transco. The gas is then stored at high pressure in underground bottles for use during peak demand periods. This unit also compresses air for mixing with propane vapor. The compressor is located in the engine room of the compressor building.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0	**Potential**: 125 mmcf/yr
2.		**2022**: 0.731 mmcf/yr
3.		

6. Emissions in Tons:

A. Actual Major: __ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx:**5.58E-01** CO: **4.57E-02** SOx: **2.30E-04** VOC: **1.73E-02** PM10: **1.10E-05** HAPs: **7.52E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 4 1a. Date of installation (month/year): 8/1952	2. MDE Registration No.: (if applicable) 9-0595

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

Unit: Worthington Compressor #4, One Emission Point: S4

SCC Number: 2-02-002-02

Model: UTC-16-6

Serial No: G-2023

Output: 1,200 hp

This unit is used to compress natural gas from the wholesale suppliers, Columbia Gas and Williams Transco. The gas is then stored at high pressure in underground bottles for use during peak demand periods. This unit also compresses air for mixing with propane vapor. The compressor is located in the engine room of the compressor building.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0	**Potential**: 125 mmcf/yr
2.		**2022**: 0.709 mmcf/yr
3.		

6. Emissions in Tons:

A. Actual Major: __ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **5.64E-01** CO: **4.43E-02** SOx: **2.23E-04** VOC: **1.68E-02** PM10: **1.07E-05** HAPs: **7.29E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 5 1a. Date of installation (month/year): 7/1962	2. MDE Registration No.: (if applicable) 9-0597

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

Unit: Worthington Compressor #5, One Emission Point: S5

SCC Number: 2-02-002-02

Model: UTC-16-6

Serial No.: G-2536

Output: 1,200 hp

This unit is used to compress air from the atmosphere for mixing of propane vapor.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. natural gas	0	**potential**: 125 mmcf/yr
2.		**2022:** 0.282 mmcf/yr
3.		

6. Emissions in Tons:

A. Actual Major: Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **2.32E-01** CO: **1.83E-02** SOx: **9.21E-05** VOC: **6.91E-03** PM10: **4.39E-06** HAPs: **3.01E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 6 1a. Date of installation (month/year): 12/1971	2. MDE Registration No.: (if applicable) 9-0596

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

Unit: Ingersoll Rand Compressor #6, Two Emission Points: S6 & S6A

SCC Number: 2-02-002-02

Model: 412-KVS

Serial No.: 412-FT-583

Output: 2,000 hp

This unit is used to compress air from the atmosphere for mixing of propane vapor

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 207.8 mmcf/yr
2.			**2022**: 0.488 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **4.02E-01** CO: **3.16E-02** SOx: **1.59E-04** VOC: **1.19E-02** PM10: **7.59E-06** HAPs: **5.20E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 7 1a. Date of installation (month/year): 5/1964	2. MDE Registration No.: (if applicable) 5-1093

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

Unit: Erie City Iron Works Boiler #6, One Emission Point: S7

SCC Number: 1-03-006-02

Model: SG-21

Serial No.: 96648; NATIONAL BOARD NO. 0016861

Specifications:

maximum pressure = 299 lbs,

steaming capacity = 26,000 lb/hr

35.2 mmbtu/hr input

heating surface boiler = 2,820 sq ft

This unit is used to preheat the compressed natural gas to avoid problems with low gas temperatures in the distribution lines. Where propane is substituted for natural gas, the unit is used to vaporize it.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0	**potential**: 280.3 mmcf/yr
2.		**2022**: 0.945 mmcf/yr
3.		

6. Emissions in Tons:

A. Actual Major: _ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **1.82E-01** CO: **1.53E-01** SOx: **1.09E-03** VOC: **1.00E-02** PM10: **3.47E-03** HAPs: **1.37E-04**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 8 1a. Date of installation (month/year): 9/1968	2. MDE Registration No.: (if applicable) 5-1092

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

Unit: Erie City Works Boiler #8, One Emission Point: S8

SCC Number: 1-03-006-02

Serial No.: 97777; NATIONAL BOARD NO. 0017650

Model: SG-21

Specifications:

maximum pressure = 200 lbs

steaming capacity = 26,000 lb/hr

34.5 mmbtu/hr input

heating surface boiler = 2,820 sqft

This unit is used to preheat the compressed natural gas to to avoid problems with low gas temperatures in the distribution lines. Where propane is substituted for natural gas, the unit is used to vaporize it.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0	**potential**: 274.7 mmcf/yr
2.		**2022**: 6.605 mmcf/yr
3.		

6. Emissions in Tons:

A. Actual Major: _Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **1.31** CO: **1.10** SOx: **7.84E-03** VOC: **7.19E-02** PM10: **2.48E-02** HAPs: **9.81E-04**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 9 1a. Date of installation (month/year): 11/1982	2. MDE Registration No.: (if applicable) 5-1096

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

Unit: Cleaver Brooks Boiler #9, One Emission Point: S9

SCC Number: 1-03-006-02

Model: Cleaver Brooks D-52

Serial No.: WL-3135; NATIONAL BOARD NO. 0053140

Specifications:

Maximum pressure = 260 lbs

Steam capacity = 32,000 lbs/hr

41.6 mmbtu/hr input

Heating surface boiler = 2,407 sqft

This unit is used to preheat the compressed natural gas to to avoid problems with low gas temperatures in the distribution lines. Where propane is substituted for natural gas, the unit is used to vaporize it.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 330.2 mmcf/yr
2.			**2022**: 16.06 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: _Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **3.10** CO: **2.60** SOx: **1.86E-02** VOC: **1.71E-01** PM10: **5.89E-02** HAPs:

2.33E-03

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 10 1a. Date of installation (month/year): 11/1991	2. MDE Registration No.: (if applicable) 5-1097

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

Unit: Cleaver Brooks Boiler #10, One Emission Point: S10

SCC Number: 1-03-006-03

Model: Cleaver Brooks CB-700-150

Serial No.: L89077

Specifications:

6.3 mmbtu/hr input

Steam capacity = 5,175 lb/hr

Used to reactivate natural gas dryers.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1. Natural Gas	0	**potential**: 50 mmcf/yr
2.		**2022**: 0.023 mmcf/yr
3.		

6. Emissions in Tons:

A. Actual Major: Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **4.34E-03** CO: **3.65E-03** SOx: **2.60E-05** VOC: **2.39E-04** PM10: **8.25E-05** HAPs: **3.26E-06**

1. Emissions Unit No.: 12 1a. Date of installation (month/year): 11/2003	2. MDE Registration No.: (if applicable) 5-1694

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

Unit: Westmore Line Heater #1, One Emission Point: S12

SCC Number: 1-03-006-03

Make: Total Energy Resources

Specification: 7.0 mmbtu/hr input

The gas is preheated before pressure reduction to avoid freezing issues in the distribution lines.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 60.1 mmcf/yr
2.			**2022**: 1.18 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: __ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **4.76E-02** CO: **4.00E-02** SOx: **2.85E-04** VOC: **2.62E-03** PM10: **9.04E-04** HAPs: **4.44E-05**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 13 1a. Date of installation (month/year): 11/2003	2. MDE Registration No.: (if applicable) 5-1695

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

Unit: Westmore Line Heater #2, One Emission Point: S13

SCC Number: 1-03-006-03

Make: Total Energy Resources

Specification:

7.0 mmbtu/hr input

The gas is preheated before pressure reduction to avoid freezing issues in the distribution lines.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 60.1 mmcf/yr
2.			**2022:** 0.952 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: _ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **5.92E-02** CO: **4.97E-02** SOx: **3.55E-04** VOC: **3.25E-03** PM10: **1.12E-03** HAPs: **3.57E-05**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 14 1a. Date of installation (month/year): 7/2005	2. MDE Registration No.: (if applicable) 9-0800

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

Unit: Emergency Generator, One Emission Point: S14

SCC Number: 1-03-006-03 1462 HP OUTPUT

Make: Caterpillar

Model No.: G3516 LE

This emission unit is an emergency generator and will not be operated for more than 500 hours per year.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 5.6 mmcf/yr*
2.			*Based on 7784 BTU/bhp-hr at 100% load, 1020 BTU/scf, 500 hrs/yr
3.			**2022**: 0.231 mmcf/yr

6. Emissions in Tons:

A. Actual Major: __ Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **5.84E-01** CO: **4.59E-02** SOx: **2.32E-04** VOC: **1.74E-02** PM10: **1.10E-05** HAPs: **7.56E-03**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 15 1a. Date of installation (month/year): 11/2011	2. MDE Registration No.: (if applicable) 5-2270

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

Unit: Columbia Line Heater #1, One Emission Point: S15

SCC Number: 1-03-006-03

Make: National Combustion Company

Specification: 7.5 mmbtu/hr input

The gas is preheated before pressure reduction to avoid freezing issues in the distribution lines.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 60.1 MMCF/YR
2.			**2022**: 3.82 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: __Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **1.91E-01** CO: **1.61E-01** SOx: **1.15E-03** VOC: **1.05E-02** PM10: **3.63E-03** HAPs: **1.43E-04**

SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: 16 1a. Date of installation (month/year): 11/2011	2. MDE Registration No.: (if applicable) 5-2271

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

Unit: Columbia Line Heater #2, One Emission Point: S16

SCC Number: 1-03-006-03

Make: NATIONAL COMBUSTION COMPANY

Specification:

7.5 mmbtu/hr input

The gas is preheated before pressure reduction to avoid freezing issues in the distribution lines.

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

General Reference: _____NA_____

NO FEDERALLY ENFORCEABLE LIMITS ON THE OPERATING SCHEDULE APPLY

Continuous Processes: 24 hours/day 365 days/year

Batch Processes: _____ hours/batch _____ batches/day

_____ days/year

5. Fuel Consumption:

	Type(s) of Fuel	% Sulfur	Annual Usage (specify units)
1.	Natural Gas	0	**potential**: 60.1 mmcf/yr
2.			**2022**: 2.85 mmcf/yr
3.			

6. Emissions in Tons:

A. Actual Major: __Potential Major: X **2022 emissions provided (tpy)**

B. Actual Emissions: NOx: **1.42E-01** CO: **1.20E-01** SOx: **8.54E-04** VOC: **7.83E-03** PM10: **2.70E-03** HAPs: **1.07E-04**

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

Emissions Unit No.: ____1, 2, 3, 4, 5, 6, & 14_____ **General Reference:** COMAR 26.11.09.05E

Briefly describe the Emission Standard/Limit or Operational Limitation:

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

(3) Emissions During Operating Mode. A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.

(4) Exceptions:

(a) Section E(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.

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

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

(ii) All other engines: 15 minutes.

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

Compliance Demonstration:

Check appropriate reports required to be submitted:

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

Methods used to demonstrate compliance:

Monitoring: Reference_ NOT APPLICABLE **Describe**: _____

_____

Testing: Reference NOT APPLICABLE **Describe**: _____

_____

Recordkeeping: Reference NOT APPLICABLE **Describe**: _____

_____

Reporting: Reference: Plant wide conditions **Describe**: Report any periods of visible emissions in accordance with Section III, Condition 4 – "Report of Excess Emissions and Deviations", of the permit.

Frequency of submittal of the compliance demonstration: Annually

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

Emissions Unit No.: 1, 2, 3, 4, 5, 6, & 14 **General Reference:** COMAR 26.11.09.08G

Briefly describe the Emission Standard/Limit or Operational Limitation:

(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.

****** *A Department sponsored program can be a Company in-house training program if approved by the Department. Washington Gas shall satisfy this requirement through use of an approved in-house training program.*

Compliance Demonstration:

Check appropriate reports required to be submitted:

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

Methods used to demonstrate compliance:

Monitoring: Reference_ COMAR 26.11.03.06C and 26.11.09.08G **Describe**: Perform engine maintenance and inspections in accordance with manufacturer's recommendations and the operations and maintenance plan. Engine inspections, tuning, and adjustments shall be performed by a qualified mechanic and in accordance with the engines manufacturers' recommendations.

Testing: Reference COMAR 26.11.09.08G **Describe**: 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

Recordkeeping: Reference COMAR 26.11.03.06C, 26.11.09.08G **Describe**: Maintain monthly records of the amounts and types of fuels burned and the hours of operation of each compressor or generator engine. Maintain records of any equipment malfunctions, repairs and preventative maintenance performed as they relate to combustion performance. Maintain a record of the results of any combustion analysis performed for at least 2 years (as required for engines operating 500 hr per year or more) and make available to the Department or EPA upon request. Maintain a record of the in-house training program attendance for each operator at the site and make these records available to the Department upon request.

Note: (For EU #6 and 14, only) Records shall include the reason for the emergency generator operation (i.e., maintenance, operational testing, or power outage, etc.)

Reporting: Reference COMAR 26.11.03.06C Describe: Submit along with the annual emissions certification the monthly fuel use records and generator operating hour records and certification of the capacity factor and/or the results of the combustion analysis (as required).

Frequency of submittal of the compliance demonstration: Semi-Annually

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

Emissions Unit No.: __7,8,9,10,12,13,15,16__ **General Reference:** _COMAR 26.11.09.05A(2) & (3)

Briefly describe the Emission Standard/Limit or Operational Limitation:

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.

EXCEPTIONS: Section A (1) and (2) of COMAR 26.11.09.05 do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:

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

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

Compliance Demonstration:

Check appropriate reports required to be submitted:

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

Methods used to demonstrate compliance:

Monitoring: Reference_ COMAR 26.11.03.06C Describe: Keep the equipment in good working order and properly maintained as to assume compliance with the visible emissions requirements.

Testing: Reference NOT APPLICABLE **Describe**: _____
_____

Recordkeeping: Reference NOT APPLICABLE **Describe**: _____
_____

Reporting: Reference: Plant wide conditions **Describe**: Report any periods of visible emissions in accordance with Section III, Condition 4 – "Report of Excess Emissions and Deviations", of the permit

Frequency of submittal of the compliance demonstration: Semi-Annually

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

Emissions Unit No.: ___7,8,9,10,12,13,15,16__ **General Reference:** _COMAR 26.11.09.08F

Briefly describe the Emission Standard/Limit or Operational Limitation:

"Space heaters" are defined as a source whose equipment 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 and located at a potential major source of NOx emissions to:

(1) A person who owns or operates a space heater 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 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.

**A Department sponsored program can be a Company or in house training program if approved by the Department. Washington Gas shall satisfy this requirement through use of their approved in-house training program*

(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.

Compliance Demonstration:

Check appropriate reports required to be submitted:

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

Methods used to demonstrate compliance:
Monitoring: Reference: COMAR 26.11.03.06C and COMAR 26.11.09.08F **Describe**: Develop and maintain an operating and maintenance plan to minimize NOx emissions. Keep equipment in good working order and properly maintained as to assure compliance with visible emissions requirements. _____ **Testing**: Reference NOT APPLICABLE **Describe**: _____ _____ **Recordkeeping**: Reference COMAR 26.11.03.06C & 26.11.09.08F **Describe**: Maintain monthly records of the amounts and type of fuels burned and the hours of operation of each boiler. Maintain records of attendance for operator training programs for each operator. Maintain records of any equipment malfunctions, repairs and preventative maintenance performed. **Reporting**: Reference COMAR 26.11.03.06C **Describe**: Submit along with the annual emissions certification monthly fuel use records and calculations verifying that the facility still meets the requirements of a "Space Heater" as defined in Condition 1.1B.

Frequency of submittal of the compliance demonstration: Semi-Annually, Annually

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

Emissions Unit No.: ____1,2,3,4,5_____ **General Reference:** _40 CFR 63 Subpart ZZZZ

Briefly describe the Emission Standard/Limit or Operational Limitation:

Startup. During startup, minimize engine idle and limit startup period to less than 30 minutes

Maintenance: Oil Filters. Change oil and filter every 4,320 hours (180 days) of operation or annually, whichever comes first OR use oil change analysis program to extend oil change frequencies per 40 CFR 63.6625(i)

Maintenance: Spark Plugs. Inspect spark plugs every 4,320 hours (180 days) of operation or annually, whichever comes first

Maintenance: Hoses and Belts. Inspect all hoses and belts every 4,320 hours (180 days) of operations or annually, whichever comes first

Maintenance: General. Operate and maintain RICE according to manufacturer's instructions or implement a maintenance plan that provides for the maintenance and operation in a manner consistent with good air pollution control practices for minimizing emissions, per 40 CFR 63.6625(e)(5).

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_ NOT APPLICABLE **Describe**: _____
_____

Testing: Reference NOT APPLICABLE **Describe**: _____
_____

Recordkeeping: Reference: 40 CFR 63.6655 **Describe:** Maintain records to show that required work practices have been met.

Reporting: Reference: NOT APPLICABLE **Describe**: _____
_____

Frequency of submittal of the compliance demonstration: Semi-Annually, Annually

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

Emissions Unit No.: 6, 14 **General Reference:** 40 CFR 63 Subpart ZZZZ

Briefly describe the Emission Standard/Limit or Operational Limitation:

Startup. During startup, minimize engine idle and limit startup period to less than 30 minutes

Maintenance: Oil Filters. Change oil and filter every 500 hours of operation or annually, whichever comes first OR use oil change analysis program to extend oil change frequencies per 40 CFR 63.6625(j)

Maintenance: Spark Plugs. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first. Replace as necessary.

Maintenance: Hoses and Belts. Inspect all hoses and belts every 500 hours of operations or annually, whichever comes first

Maintenance: General. Operate and maintain RICE according to manufacturer's instructions or implement a maintenance plan that provides for the maintenance and operation in a manner consistent with good air pollution control practices for minimizing emissions, per 40 CFR 63.6625(e)(5).

Operation: If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs 40 CFR 63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs 40 CFR 63.6640(f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs 40 CFR 63.6640(f)(1) through (2) and (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) You may operate your emergency stationary RICE for the purposes specified in paragraphs 40 CFR 63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs 40 CFR 63.6640(f)(3) and (4) counts as part of the 100 hours per calendar year allowed by this paragraph.

(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 40 CFR 63.6640(f)(2) . Except as provided in paragraphs 40 CFR 63.6640(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.

(ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

A. The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

B. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

C. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

D. The power is provided only to the facility itself or to support the local transmission and distribution system.

E. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

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: Reference: 40 CFR 63.6625(f) _ **Describe**: Install a non-resettable hour meter

_____

Testing: Reference NOT APPLICABLE **Describe**: _____

_____

Recordkeeping: Reference: 40 CFR 63.6655(e) and (f) **Describe:** Maintain records of maintenance conducted. Maintain hours & purpose for operation.

Reporting: Reference: 40 CFR 63 Subpart ZZZZ – Footnote 2 of Table 2d **Describe**: 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.

Frequency of submittal of the compliance demonstration: Semi-Annually

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

Emissions Unit No.: Plantwide **General Reference**: COMAR 26.11.01.07 & 26.11.03.06C(7)

Briefly describe the Emission Standard/Limit or Operational Limitation:

REPORT OF EXCESS EMISSIONS AND DEVIATIONS: The facility shall comply with the following conditions for occurrences of excess emissions and deviations from requirements of the permit:

a. Report any deviation from permit requirements that could endanger human health or the environment, by orally notifying the Department immediately upon discovery of the deviation.
b. Promptly report all occurrences of excess emissions that are expected to last for one hour or longer by orally notifying the Department of the onset and termination of the occurrence.
c. When requested by the Department, report all deviations from permit conditions, including those attributed to malfunctions, within 5 days of the request by submitting a written description with the required information.
d. Submit semi-annual monitoring reports that confirm all required monitoring was performed, and provide accounts of all deviations from permit requirements that occurred. Each account should include the necessary information as stated in the reference. 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, submit a written report with the information required in COMAR 26.11.01.07C(2) within 10 days of receiving the request concerning the occurrence of excess emissions.

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 NOT APPLICABLE **Describe**: _____

_____

Testing: Reference NOT APPLICABLE **Describe**: _____

_____

Recordkeeping: Reference As required **Describe**: _____

_____

Reporting: Reference As required **Describe**: _____

_____

Frequency of submittal of the compliance demonstration: Semi-annually

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

Emissions Unit No.: __Plantwide_ **General Reference**: COMAR 26.11.01.05-1, 26.11.02.19C & 26.11.02.19D

Briefly describe the Emission Standard/Limit or Operational Limitation:

EMISSIONS CERTIFICATION REPORT: The facility shall certify actual annual emissions of regulated pollutants from the facility on a calendar year basis, not later than April 1 of the year following the year for which the certification is required.

Permit Shield Request: __June 30, 2023_____

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 _NOT APPLICABLE **Describe**: _____
_____
_____

Testing: Reference NOT APPLICABLE **Describe**: _____
_____
_____

Recordkeeping: Reference ___As required **Describe**: _Report records maintained by submitter._____
_____
_____

Reporting: Reference ____As required_ **Describe**: _____
_____
_____

Frequency of submittal of the compliance demonstration: _Annually

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

Emissions Unit No.: __Plantwide_ **General Reference**: COMAR 26.11.03.06G(6) and (7)

Briefly describe the Emission Standard/Limit or Operational Limitation:

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

Permit Shield Request: __June 30, 2023_____

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 _NOT APPLICABLE **Describe**: _____

_____

_____

Testing: Reference _NOT APPLICABLE **Describe**: _____

_____

_____

Recordkeeping: Reference ___As required **Describe**: _Report records maintained by submitter.

_____

_____

Reporting: Reference ___As required **Describe**: _____

_____

_____

Frequency of submittal of the compliance demonstration: Annually

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

Emissions Unit No.: __Plantwide_ **General Reference**: COMAR 26.11.03.06C(5) & (6)

Briefly describe the Emission Standard/Limit or Operational Limitation:

GENERAL RECORDKEEPING: 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

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 _NOT APPLICABLE **Describe**: _____
_____
_____

Testing: Reference NOT APPLICABLE **Describe**: _____
_____
_____

Recordkeeping: Reference _As required **Describe**: _Maintenance/repair log, training logs, and oil analysis records available upon request at the facility._____
_____

Reporting: Reference NOT APPLICABLE **Describe**: _____
_____
_____

Frequency of submittal of the compliance demonstration: Annually

SECTION 3D. ALTERNATE OPERATING SCENARIOS

Emissions Unit No.: N/A

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

NOT APPLICABLE

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

Scenario No.: _____

Emissions Unit No.: _____ General Reference: _____

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

_____NOT APPLICABLE_____

Compliance Demonstration

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference _____ Describe: _____

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration: _____

SECTION 4. CONTROL EQUIPMENT

1. Associated Emissions Units No. : NOT APPLICABLE	2. Emissions Point No.: NOT APPLICABLE

3. Type and Description of Control Equipment:
NOT APPLICABLE

4. Pollutants Controlled:	Control Efficiency:

5. Capture Efficiency:

SECTION 5. SUMMARY SHEET OF POTENTIAL EMISSIONS

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

Pollutant					
CAS Number					
Emissions Unit #	Not required	Not required	Not required	Not required	Not required
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Emissions Unit #					
Fugitive Emissions					
Total	Not required	Not required	Not required	Not required	Not required

NOTE: THIS PAGE IS PROVIDED FOR INFORMATION ONLY. WASHINGTON GAS IS NOT ATTEMPTING TO VERIFY COMPLIANCE WITH A PLANT-WIDE EMISSION LIMIT, CLAIM ANY EXEMPTION, OR RESOLVE A DISPUTE (AS DESCRIBED IN THE INSTRUCTIONS.)

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

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

1. Applicable Requirement:

NOT APPLICABLE

2. Brief Description:

_____

_____

_____

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

_____

_____

_____

_____

_____

SECTION 7. COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS

1. Emissions Unit #	Anticipated Compliance Date
NOT APPLICABLE	
Applicable Federally Enforceable Requirement being Violated:	

2. Description of Plan to Achieve Compliance:

_____

_____

_____

_____

_____

_____

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

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STATE-ONLY ENFORCEABLE REQUIREMENTS

Facility Information:

Name of Facility: Washington Gas Rockville Station County: Montgomery
Premises Number: 15-1591
Street Address: 7301 Westmore Rd Rockville, MD 20850
24-hour Emergency Telephone Number for Air Pollution Matters: (703)750-4831 (Dispatch) (703)750-4371 (Gas Operations)
Type of Equipment (List Significant Units):
5 – Worthington Compressors (1,200 hp)
1 – Ingersoll Rand Compressor (2,000 hp)
2 – Erie City Boilers (35.2 and 34.5 mmbtu/hr input)
2 – Cleaver Brooks Boilers (41.6 and 6.3 mmbtu/hr input)
2 – Natural Gas Line Heaters (7.0 mmbtu/hr input)
2 – Natural Gas Line Heaters (7.5 mmbtu/hr input)
1 – Emergency Generator (1,462 hp)

CITATION TO AND DESCRIPTION OF APPLICABLE STATE-ONLY ENFORCEABLE REQUIREMENTS

Registration No.: Plantwide

Emissions Unit No.: Plantwide **General Reference:** COMAR 26.11.06.08 & 09_

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

COMAR 26.11.06.08 prohibits the operation or maintenance of an installation or premises in such a manner that a nuisance or air pollution is created.

COMAR 26.11.06.09 prohibits the discharge into the atmosphere of gases, vapors, or odors beyond the property line in such a manner that a nuisance or air pollution is created.

Methods used to demonstrate compliance:

GENERALLY APPLICABLE

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

III. Check-off List of Emissions Units and Activities Exempt from the Part 70 Permit Application

Insignificant Activities

Place a check mark beside each type of emissions unit or activity that is located at the facility. Where noted, please indicate the number of that type of emissions unit or activity located at the facility.

(1) No.___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.__5_Stationary internal combustion engines with less than 500 brake horsepower (373 kilowatts) of power output

Location	Number of Generators	Installation Date	Power
Westmore Gate Station	1	2017	25KW
Rockville Gate Station (Meter Skid)	1	2016	25KW
Communication Building	1	2006	15KW
Office Building	1	2010	45KW
Rockville Gate Station (Comm Bldg)	1	2016	35KW

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

(5) ___Water cooling towers and water cooling ponds unless used for evaporative cooling of water from barometric jets or barometric condensers, or used in conjunction with an installation requiring a permit to operate;

(6) No._1_Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

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

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

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

(10) ____Die casting machines;

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

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

(13)____Brazing, soldering, or welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals and not directly related to plant maintenance, upkeep and repair or maintenance shop activities;

(14)____ Equipment for washing or drying products fabricated from metal or glass, provided that no VOC is used in the process and that no oil or solid fuel is burned;

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

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

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

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

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

(d) No. _12_ Storage of lubricating oils:

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

(f) No._1__Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel,

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

(h) No._1_The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less;

(17) ___ Gaseous fuel-fired or electrically heated furnaces for heat treating glass or metals, the use of which does not involve molten materials;

(18) Crucible furnaces, pot furnaces, or induction furnaces, with individual capacities of 1,000 pounds (454 kilograms) or less each, in which no sweating or distilling is conducted, or any fluxing is conducted using chloride, fluoride,

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

(a) ___ Aluminum or any alloy containing over 50 percent aluminum, if no gaseous chloride compounds, chlorine, aluminum chloride, or aluminum fluoride is used;

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

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

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

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

(f) ___ Copper;

(g) ____ Precious metals;

(19)_x_ Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a total cooking area of 5 square feet (0.46 square meter) or less;

(20) ___ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process;

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

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

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

(24)___ Emissions resulting from the use of explosives for blasting at quarrying operations and from the required disposal of boxes used to ship the explosive;

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

(26)____Grain, metal, or mineral extrusion presses;

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

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

(29) ____ Laboratory fume hoods and vents;

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

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. 4 Makeup air heaters

No. 2 Water heaters

No. 2 Underground odorant storage tanks; emissions controlled by flare

No. 1 Hexane Storage and Gas Conditioning System (including four 30,000-gallon hexane tanks)

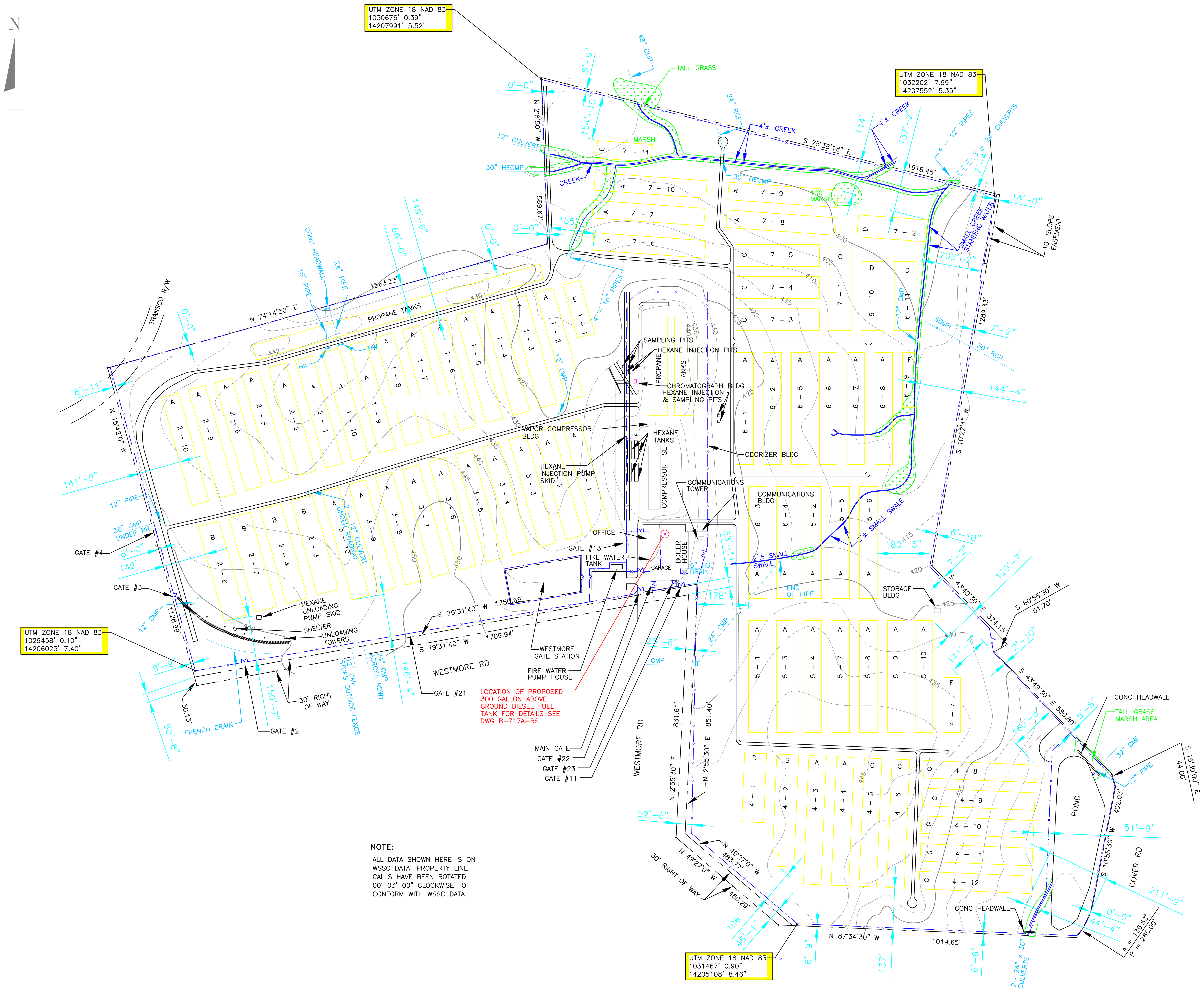
No. ___ _____

(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. ___ _____



NOTE:

ALL DATA SHOWN HERE IS ON WSSC DATA. PROPERTY LINE CALLS HAVE BEEN ROTATED 00° 03' 00" CLOCKWISE TO CONFORM WITH WSSC DATA.

LEGEND:

1. TYPE A – 50 BLOCKS
   1 BLOCK – 334'–10" X 60'
   39 GAS CONTAINERS
2. TYPE B – 5 BLOCKS
   1 BLOCK – 334'–10" X 75'
   42 GAS CONTAINERS
   #2 THRU #8 38 CONTAINERS
   (4 REMOVED– ONE ABANDONED IN PLACE)
   #2 THRU #7 41 CONTAINERS
   (ONE REMOVED)
3. TYPE C – 4 BLOCKS
   1 BLOCK – 286' X 75'
   36 GAS CONTAINERS
4. TYPE D – 4 BLOCKS
   1 BLOCK – 236'–2" X 75'
   30 GAS CONTAINERS
5. TYPE E – 3 BLOCKS
   1 BLOCK – 188'–4" X 60'
   20 GAS CONTAINERS
6. TYPE F – 1 BLOCKS
   1 BLOCK – 188'–4" X 45'
   16 GAS CONTAINERS
7. TYPE G – 7 BLOCKS
   1 BLOCK – 432'–6" X 60'
   45 GAS CONTAINERS

A ← BLOCK TYPE
5 – 4 ← BLOCK NUMBER
← FIELD NUMBER
TYPICAL BLOCK

THIS DRAWING SUPERSEDES DRAWING OF SAME NO. DRAWN 6–79, BY ARJ & B–51–RS–5 DRAWN 6–15–79 BY ARJ

SURFACE DRAINAGE – IN AND OUT

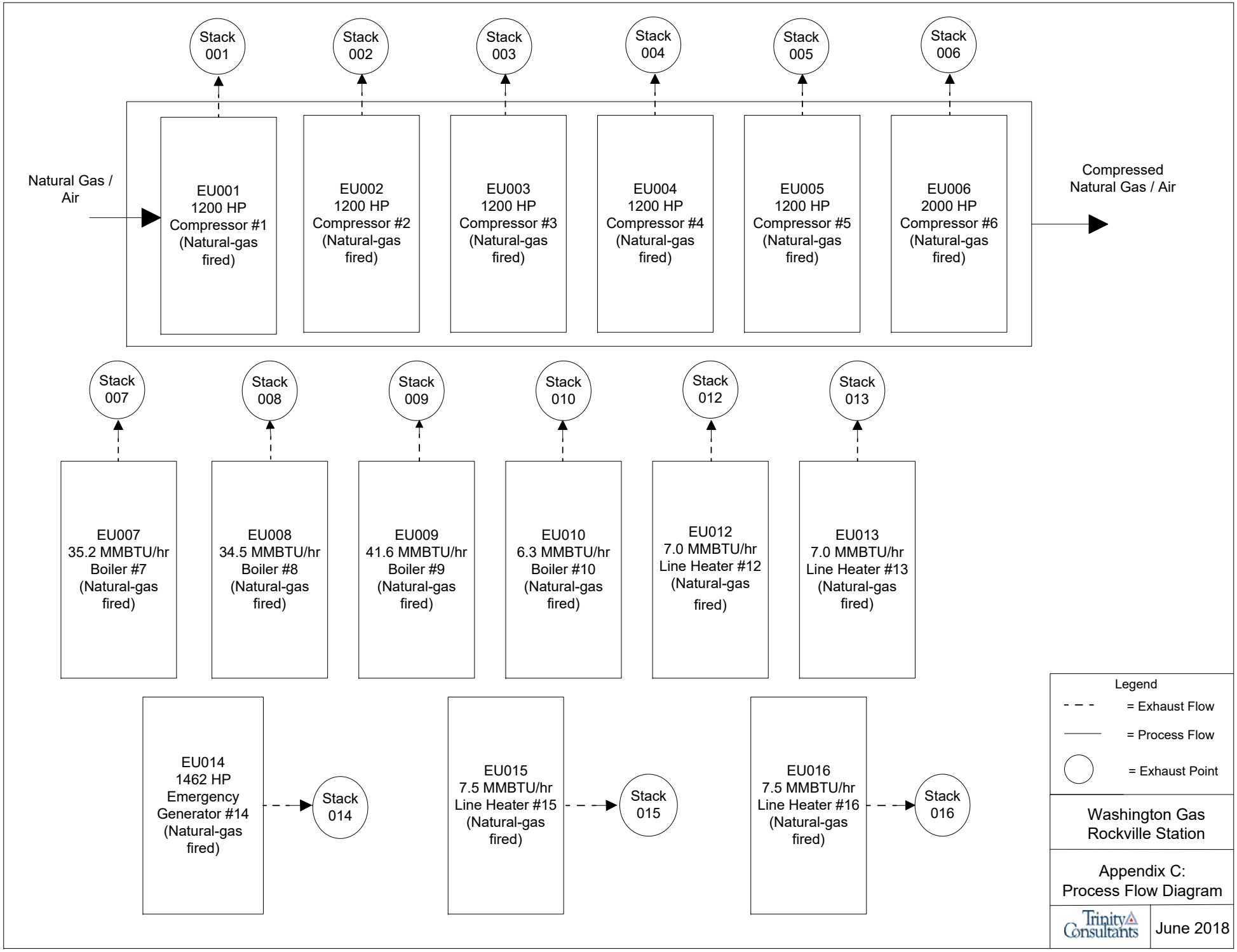
WASHINGTON GAS LIGHT CO.

ROCKVILLE STATION

ROCKVILLE STATION PLOT PLAN

	REV	DRW	CHK	DATE	APPD	APPD
4. REVISED TO SHOW DISTANCES TO PROPANE TANKS AND GAS FIELDS	4	JEI	JEI	4–8–16	KK	TFF
3. REVISED TO SHOW HEXANE EQUIPMENT	3	JEI	JEI	1–7–09	CHD JS	HSR
2. REVISED TO SHOW REFERENCE TO WESTMORE GATE STATION	2	CPC	JEI			
5. LOCATED GAS AND PROPANE FIELDS	5	JEI	JEI	4–11–16		KK TFF

DR ENG	CHK JWG	APPD HDD	APPD BAS
DATE 7–7–92	DATE 8–10–92	APPD JS	APPD HSR
SCALE 1" = 200'		APPD JLR	DATE 8–18–92
DWG NO B–51–RS–6			COMP. No. B51RS6


Stack 001
Stack 002
Stack 003
Stack 004
Stack 005
Stack 006
Natural Gas / Air
EU001 1200 HP Compressor #1 (Natural-gas fired)
EU002 1200 HP Compressor #2 (Natural-gas fired)
EU003 1200 HP Compressor #3 (Natural-gas fired)
EU004 1200 HP Compressor #4 (Natural-gas fired)
EU005 1200 HP Compressor #5 (Natural-gas fired)
EU006 2000 HP Compressor #6 (Natural-gas fired)
Compressed Natural Gas / Air
Stack 007
Stack 008
Stack 009
Stack 010
Stack 012
Stack 013
EU007 35.2 MMBTU/hr Boiler #7 (Natural-gas fired)
EU008 34.5 MMBTU/hr Boiler #8 (Natural-gas fired)
EU009 41.6 MMBTU/hr Boiler #9 (Natural-gas fired)
EU010 6.3 MMBTU/hr Boiler #10 (Natural-gas fired)
EU012 7.0 MMBTU/hr Line Heater #12 (Natural-gas fired)
EU013 7.0 MMBTU/hr Line Heater #13 (Natural-gas fired)
EU014 1462 HP Emergency Generator #14 (Natural-gas fired)
Stack 014
EU015 7.5 MMBTU/hr Line Heater #15 (Natural-gas fired)
Stack 015
EU016 7.5 MMBTU/hr Line Heater #16 (Natural-gas fired)
Stack 016
Legend
= Exhaust Flow
= Process Flow
= Exhaust Point
Washington Gas Rockville Station
Appendix C: Process Flow Diagram
Trinity Consultants
June 2018

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

FORM 1:

GENERAL FACILITY INFORMATION
EMISSIONS CERTIFICATION REPORT

Calendar Year: **2022**

A. FACILITY IDENTIFICATION Facility Name **Washington Gas Company - Rockville Station**	Do Not Write in this Space Date Received Regional
Address **7301 Westmore Road**	Date Received State
City **Rockville** County **Montgomery** Zip Code **20850**	AIRS Code
B. Briefly describe the major function of the facility	FINDS code
Natural gas and propane storage and peaking facility; provides supplemental propane/air to the gas distribution system during peak demand (winter months) and stores high pressure natural gas for use in emergency situations.	SIC Code Facility Number
	TEMPO ID:
C. SEASONAL PRODUCTION (% if applicable)	Reviewed by:

Winter (Dec-Feb)	Spring (Mar-May)	Summer (Jun-Aug)	Fall (Sept-Nov)	
68%	21%	0%	11%	

Name Date

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

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

Control Device	Capture Efficiency	Removal Efficiency
NONE		

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

Laura Boisvert	SVP Operations	1/19/2023
Name (Print/Type)	**Title**	**Date**
Laura Boisvert		703-750-7924
Signature		**Telephone**

1/9/2008

FORM 4:

Calendar Year: 2022

TOXIC AIR POLLUTANTS

EMISSIONS CERTIFICATION REPORT

Facility Name: Washington Gas Company - Rockville Station **Facility ID#:** 031-01951 **Pollutant:** **Formaldehyde** *

Equipment Description/ Registration No.	Actual Emissions			Control Device**	% Efficiency
	Tons/yr	Lbs/day	Lbs/hr		
Emergency Generator 9-0800	7.56E-03	2.4E-03	9.8E-05		
Worthington Compressor Unit #1 9-0592	7.40E-03	1.9E-03	8.1E-05		
Worthington Compressor Unit #2 9-0593	7.13E-03	1.9E-03	8.1E-05		
Worthington Compressor Unit #3 9-0594	7.52E-03	1.9E-03	8.1E-05		
Worthington Compressor Unit #4 9-0595	7.29E-03	1.9E-03	8.1E-05		
Worthington Compressor Unit #5 9-0596	3.01E-03	1.9E-03	8.1E-05		
Ingersoll-Rand Compressor Unit #6 9-0597	5.20E-03	3.2E-03	1.3E-04		
Erie City Iron Works Boiler #6 1093	1.37E-04	3.1E-05	1.3E-06		
Erie City Iron Works Boiler #8 1092	9.81E-04	3.0E-05	1.3E-06		
Cleaver-Brooks Boiler #9 1096	2.33E-03	3.7E-05	1.5E-06		
Cleaver-Brooks Boiler #10 1097	3.26E-06	5.5E-06	2.3E-07		
Westmore Line Heater #1 5-1694	4.44E-05	6.2E-06	2.6E-07		
Westmore Line Heater #2 5-1695	3.57E-05	6.2E-06	2.6E-07		
Columbia Line Heater #1 5-2270	1.43E-04	6.2E-06	2.6E-07		
Columbia Line Heater #2 5-2271	1.07E-04	6.2E-06	2.6E-07		
Totals	**4.89E-02**	**1.54E-02**	**6.41E-04**		

* Please attach all calculations.
* See Attachment 1 for the minimum reporting values.
**Control Device
S = Scrubber
B = Baghouse
ESP = Electrostatic Precipitator
A = Afterburner
C = Condenser
AD = Adsorbtion
O = Other

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

01/09/08

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 04/30/2013

Federal Operating Permit Program (40 CFR Part 71)

ANNUAL COMPLIANCE CERTIFICATION (A-COMP)

A. GENERAL INFORMATION

Permit No. 24-031-01951

Reporting Period: Beg. 01/01/2022 End. 12/31/2022

Source / Company Name: Washington Gas – Rockville Plant

Mailing Address: 7301 Westmore Road

City: Rockville State: MD ZIP: 20849

Contact person: Melissa Wilson Title: Environmental Specialist

Telephone: (703) 750 - 7568

Continued on next page

B. COMPLIANCE STATUS

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

Emission Unit ID(s):
Emission Units #1, 2, 3, 4, 5, 6, & 14, Natural gas fired engine/compressor units consisting of five Worthington 1,200-hp compressors, one Ingersoll-Rand 2,000-hp compressor, and one 1,462-hp Caterpillar emergency generator.

Permit Term (Describe requirements and cross-reference):
Table IV – 1.1.A. Control of Visible Emissions. COMAR 26.11.09.05E.

A person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity. 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. Exceptions: 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. Does not apply to emissions resulting directly from cold engine start up and warm up.

Compliance Methods for the Above (Description and Citation):
Visual inspections are conducted by location engineers. No monitoring, testing, or recordkeeping for opacity is required by the permit, other than reporting any periods of visible emissions. Records of amounts and types of fuels burned and the hours of operation of each engine are maintained. Combustion analysis and optimization is conducted annually.

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

Emission Unit ID(s):
Emission Units #1, 2, 3, 4, 5, 6, & 14, Natural gas fired engine/compressor units consisting of five Worthington 1200-hp compressors, one Ingersoll-Rand 2,000-hp compressor, and one 1462-hp Caterpillar emergency generator.

Permit Term (Describe requirements and cross-reference):
Table IV – 1.1.B. Control of Nitrogen Oxides. COMAR 26.11.09.08G.
Provide certification of the capacity factor of the equipment, perform combustion analysis and optimize combustion at least once annually for fuel-burning equipment that operates more than 500 hours during a calendar year, maintain the results of the combustion analysis for at least 2 years and make results available, require each operator of an installation to attend operator training programs at least once every 3 years, and maintain a record of training program attendance for each operator.

Compliance Methods for the Above (Description and Citation):
Fuel and operating records, operator training records, and records of any equipment malfunctions, repairs, and preventative maintenance are kept on-site. Operating records are used to verify that the annual capacity factor is less than or equal to 15% for each unit. None of the engines exceeded the permitted levels of operation during calendar year 2022 (see attached table of hours and fuel usage). Combustion analyses are conducted annually for applicable engines.

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

Emission Unit ID(s):
Emission Units #1, 2, 3, 4, 5, 6, & 14, Natural gas fired engine/compressor units consisting of five Worthington 1,200-hp compressors, one Ingersoll-Rand 2,000-hp compressor, and one 1,462-hp Caterpillar emergency generator.

Permit Term (Describe requirements and cross-reference)
Table IV – 1.3.B Monitoring Requirements

The Permittee shall perform engine maintenance and inspections in accordance with the manufacturer's recommendations and the operations and maintenance plan. Engine inspections, tuning, and adjustments shall be performed by a qualified mechanic and in accordance with the engines manufacturer's recommendations.

Compliance Methods for the Above (Description and Citation):
Maintenance and inspections are completed by a qualified mechanic per manufacturer recommendations and O&M plan.

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

Emission Unit ID(s):
Emission Units #1, 2, 3, 4, 5, 6, & 14, Natural gas fired engine/compressor units consisting of five Worthington 1200-hp compressors, one Ingersoll-Rand 2,000-hp compressor, and one 1462-hp Caterpillar emergency generator.

Permit Term (Describe requirements and cross-reference)
Table IV – 1.4.B. Record Keeping Requirements.

The Permittee shall maintain monthly records of the amounts and type of fuels burned and the hours of operation of each compressor or generator engine. The Permittee shall maintain records of any equipment malfunctions, repairs, and preventative maintenance performed as they relate to combustion performance. For EU #14 only, records shall include the reason for the emergency generator operation. Maintain a record of results of any combustion analysis performed for at least 2 years. Prepare and maintain a record of the in-house training program attendance for each operator at the site.

Compliance Methods for the Above (Description and Citation):
Monthly records of operation and amounts of fuel burned are kept for each engine (see attached table of hours and fuel usage). Records of annual combustion analyses and in-house trainings are kept in a company database and can be made available upon Department or EPA request.

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

Emission Unit ID(s):
Emission Units #1, 2, 3, 4, 5, 6, & 14, Natural gas fired engine/compressor units consisting of five Worthington 1,200-hp compressors, one Ingersoll-Rand 2,000-hp compressor, and one 1,462-hp Caterpillar emergency generator.

Permit Term (Describe requirements and cross-reference)
Table IV – 1.5.A&B Reporting Requirements.
The Permittee shall report any periods of visible emissions. The Permittee shall submit along with the annual emissions certification, records of monthly fuel use, generator operating hours, and results

of the combustion analysis.

Compliance Methods for the Above (Description and Citation):
See attached monthly fuel use and generator operating hours. Visual inspections are conducted by location engineers. No periods of visible emissions occurred in 2022. Combustion analysis results are submitted to the Department annually.

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

Emission Unit ID(s):
Emission Units #7, 8, 9, 10, 12, & 13, four natural gas fired boilers and four natural gas fired indirect line heaters.

Permit Term (Describe requirements and cross-reference)
Table IV – 2.1.A. Control of Visible Emissions. COMAR 26.11.09.05
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.

Compliance Methods for the Above (Description and Citation):
Visual inspections are conducted by location engineers. No monitoring, testing, or recordkeeping for opacity is required by the permit, other than reporting any periods of visible emissions.

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

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Emission Units (Unit IDs):
Emission Units #7, 8, 9, 10, 12, & 13, four natural gas fired boilers and four natural gas fired indirect line heaters.

Permit Term (Describe requirements and cross-reference)
Table IV – 2.1.B. Control of Nitrogen Oxides. COMAR 26.11.09.08
The Permittee shall keep the equipment in good working order and properly maintained as to assure compliance with the visible emissions requirements. The Permittee shall develop and maintain an operating and maintenance plan to minimize NOx emissions. Require installation operators to attend training programs and maintain attendance records.

Compliance Methods for the Above (Description and Citation):
Best management practices and maintenance are conducted per permit requirements to minimize NOx emissions. Training records are maintained.

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

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Emission Units (Unit IDs):
Emission Units #7, 8, 9, 10, 12, & 13, four natural gas fired boilers and four natural gas fired indirect line heaters.

Permit Term (Describe requirements and cross-reference)
Table IV – 2.3.A &B. COMAR 26.11.03.06C and COMAR 26.11.09.08F
The Permittee shall keep the equipment in good working order and properly maintained as to assure compliance with the visible emissions requirements. The permittee shall develop and maintain an operating and maintenance plan to minimize NOx emissions.

Compliance Methods for the Above (Description and Citation):
Best management practices and maintenance are conducted per permit requirements to minimize NOx emissions.

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

Emission Units (Unit IDs):
Emission Units #7, 8, 9, 10, 12, & 13, four natural gas fired boilers and four natural gas fired indirect line heaters.

Permit Term (Describe requirements and cross-reference)
Table IV – 2.4.A&B. Record Keeping Requirements.
The Permittee shall maintain monthly records of the amounts and type of fuels burned and the hours of operation of each boiler. Permittee shall maintain records of attendance for operator training. The Permittee shall maintain records of any equipment malfunctions, repairs, and preventative maintenance performed.

Compliance Methods for the Above (Description and Citation):
See attached monthly fuel use and operating hours. Records of in-house training, maintenance, repairs, and malfunctions are maintained at the facility. Records can be made available upon Department or EPA request.

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

Emission Units (Unit IDs):
Emission Units #7, 8, 9, 10, 12, & 13, four natural gas fired boilers and four natural gas fired indirect line heaters.

Permit Term (Describe requirements and cross-reference)
Table IV – 2.5 Reporting Requirements: The Permittee shall report any periods of visible emissions.
The Permittee shall submit along with the annual emissions certification, records of monthly fuel use and calculations verifying that the facility still meets the requirements of a “Space Heater”.

Compliance Methods for the Above (Description and Citation):
See attachments for monthly fuel usage records and calculations of each applicable engine.

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

Emission Units (Unit IDs):
Insignificant Activity (3) Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons’ capacity or less.

Permit Term (Describe requirements and cross-reference)
Insignificant Activity (3),
Monthly records of the total VOC degreasing materials used; and written description of good operating practices.

Compliance Methods for the Above (Description and Citation):
Records of degreaser purchase and change out are kept at the facility.

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

Emission Unit ID(s):

Emission Units #1,2,3,4, & 5 natural gas fired engine/compressor units consisting of five Worthington 1,200-hp (2SLB-SI) compressors. Emission Unit #6 one Ingersoll-Rand 2,000-hp ($SRB-SI) natural gas fired compressor. Emission Unit #14 one 1,462-hp Caterpillar natural gas fired engine driven emergency generator.

Permit Term (Describe requirements and cross-reference)
Table IV – 1.A. NESHAP Subpart ZZZZ-RICE MACT

Change oil and filter every 4,320 hrs. of operation or annually, whichever comes first, b. Inspect spark plugs every 4,320 hrs. of operation or annually, whichever comes first, and replace as necessary; and c. inspect all hoses and belts every 4,320 hrs. of operation or annually, whichever comes first and replace as necessary.

Compliance Methods for the Above (Description and Citation):
Emission Units #1,2,3,4, & 5 are a part of a maintenance program that performs annual checks of the above required components (including testing) and makes replacements as needed per the manufacture's requirements.

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

Emission Units (Unit IDs):
Emission Unit #6 One Ingersoll-Rand 2,000-hp ($SRB-SI) natural gas fired compressor

Permit Term (Describe requirements and cross-reference)
Table IV – 1.A. NESHAP Subpart ZZZZ-RICE MACT
For non-emergency, non-black start 4RSB stationary RICE >500HP that are not remote stationary RICE and that operate more than 24 hours per calendar year, install NSCR to reduce HAP emissions from the stationary RICE.

Compliance Methods for the Above (Description and Citation):
Washington Gas received an applicability determination from the US EPA on Feb 23, 2015 noting that the 10 engines that operate at a similar WG facility are in fact considered emergency stationary RICE as defined in Subpart ZZZZ. Based on conversations with MDE officials, this applicability determination also applies to EU #6 since in is operated in the same capacity as the engines noted in this determination. Washington Gas is therefore compliant with all requirements noted within the subpart related to emergency stationary RICE. EU #6 is a part of a maintenance program that performs annual checks of the above required components (including testing) and makes replacements as needed per the manufacture's requirements.

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

Emission Unit ID(s):
Emission Unit #14 One 1,462-hp Caterpillar natural gas fired engine driven emergency generator

Permit Term (Describe requirements and cross-reference)
Table IV – 1.A. NESHAP Subpart ZZZZ-RICE MACT

a. Change oil and filter every 4,320 hrs. of operation or annually, whichever comes first, b. Inspect spark plugs every 4,320 hrs of operation or annually, whichever comes first, and replace as necessary; and c. inspect all hoses and belts every 4,320 hrs. of operation or annually, whichever comes first and replace as necessary.

Compliance Methods for the Above (Description and Citation):
Emission Unit #14 is a part of an oil analysis and maintenance program that performs annual checks of the above required components (including testing) and makes replacements as needed per the manufacture's requirements.

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

Emission Units (Unit IDs):
Emission Unit #6 One Ingersoll-Rand 2,000-hp ($SRB-SI) natural gas fired compressor

Permit Term (Describe requirements and cross-reference)
Table IV – 1.A. NESHAP Subpart ZZZZ-RICE MACT
For non-emergency, non-black start 4RSB stationary RICE >500HP that are not remote stationary RICE and that operate more than 24 hours per calendar year, conduct initial performance tests or initial compliance demonstration within 180 days of the compliance date. Conduct subsequent performance tests every 8760 hrs or 3 years whichever comes first.

Compliance Methods for the Above (Description and Citation):

Washington Gas received an applicability determination from the US EPA on Feb 23, 2015 noting that the 10 engines that operate at a similar WG facility are in fact considered emergency stationary RICE as defined in Subpart ZZZZ. Based on conversations with MDE officials, this applicability determination also applies to EU #6 since in is operated in the same capacity as the engines noted in this determination. Washington Gas is therefore compliant with all requirements noted within the subpart as emergency stationary RICE have no testing requirements.

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

Emission Unit ID(s):
Emission Unit #6 One Ingersoll-Rand 2,000-hp ($SRB-SI) natural gas fired compressor

Permit Term (Describe requirements and cross-reference)
Table IV – 1.A. NESHAP Subpart ZZZZ-RICE MACT
For non-emergency, non-black start 4RSB stationary RICE >500HP that are not remote stationary RICE and that operate more than 24 hours per calendar year, install NSCR to reduce HAP emissions from the stationary RICE and comply with required emission, operating limitations and continuous monitoring requirements.

Compliance Methods for the Above (Description and Citation):
Washington Gas received an applicability determination from the US EPA on Feb 23, 2015 noting that the 10 engines that operate at a similar WG facility are in fact considered emergency stationary RICE as defined in Subpart ZZZZ. Based on conversations with MDE officials, this applicability determination also applies to EU #6 since in is operated in the same capacity as the engines noted in this determination. Washington Gas is therefore compliant with all requirements noted within the subpart. Emergency stationary RICE do not have emission, operating limitations and continuous monitoring requirements

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

Emission Units (Unit IDs):
Emission Units #1,2,3,4, & 5 natural gas fired engine/compressor units consisting of five Worthington 1,200-hp (2SLB-SI) compressors. Emission Unit #6 One Ingersoll-Rand 2,000-hp ($SRB-SI) natural gas fired compressor. Emission Unit #14 One 1,462-hp Caterpillar natural gas fired engine driven emergency generator

Permit Term (Describe requirements and cross-reference)
Table IV – 1.A. NESHAP Subpart ZZZZ-RICE MACT
For non-emergency, non-black start SI 2SLB stationary RICE and emergency RICE comply with the monitoring, installation, collection, operation, and maintenance requirements as noted.

Compliance Methods for the Above (Description and Citation):
Emission Units # 1-6 and 14 are a part of an operations program that was developed per the manufacturer's emission-related instructions. This program was developed to address both the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions.

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

Emission Unit ID(s):
Emission Unit #14 One 1,462-hp Caterpillar natural gas fired engine driven emergency generator

Permit Term (Describe requirements and cross-reference)
Table IV – 1.A. NESHAP Subpart ZZZZ-RICE MACT
If you own or operate an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter.

Compliance Methods for the Above (Description and Citation):
The hour meter associated with EU14 is non-resettable.

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

Emission Units (Unit IDs):
Emission Units #1,2,3,4, & 5 natural gas fired engine/compressor units consisting of five Worthington 1,200-hp (2SLB-SI) compressors. Emission Unit #6 One Ingersoll-Rand 2,000-hp ($SRB-SI) natural gas fired compressor. Emission Unit #14 One 1,462-hp Caterpillar natural gas fired engine driven emergency generator

Permit Term (Describe requirements and cross-reference)
Table IV – 1.A. NESHAP Subpart ZZZZ-RICE MACT
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.

Compliance Methods for the Above (Description and Citation):
Emission Units # 1-6 and 14 are a part of an operations program that was developed per the manufacturer's emission-related instructions. This program was developed to address both the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. None of the emission units can idle for periods longer than 30 min.

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

C. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

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

Permit Term for Which There was a Deviation:

No deviations of Title V Permit specific conditions during the reporting period.

Emission Units (unit IDs):

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

Date Written Report Submitted ____/____/_____

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

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

Date Written Report Submitted ____/____/_____

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

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

Date Written Report Submitted ____/____/_____

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

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

Date Written Report Submitted ____/____/_____

INSTRUCTIONS FOR A-COMP
ANNUAL COMPLIANCE CERTIFICATION

Information Collection Burden Estimates

The public reporting and recordkeeping burden for this collection of information is estimated to average 221 hours per respondent per year. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

DETAILED INSTRUCTIONS

Submit this form along with a certification of truth, accuracy and completeness by a responsible official on an annual basis.

Section A (General Information)

Name and address should be consistent with information provided previously. The contact person should be a person familiar with the day-to-day operation of the facility, such as a plant site manager or other individual, who should be available to be contacted by the permitting authority. If there is more than one contact person, list the others on an attachment.

The reporting period must be at least every 12 months, but your permit may require this more frequently.

Section B (Compliance Status)

Description of Permit Term: Include each permit terms that imposes a requirement or action (emission limitations, standards, monitoring, recordkeeping, reporting, and other requirements on one or more emission units or on the facility. You will likely have to complete this section numerous times to include all requirements in the permit.

The emissions unit ID(s) should be those defined in the permit or in section I of form GIS. If the requirements, including compliance methods, apply in the same way to multiple emission units, you may list multiple units for a particular requirement. Emission units and requirements may be grouped if they apply the same way at all units in the group, the same compliance methods apply to all, and all units have the same compliance status.

Citations to the requirements should unambiguously identify the permit term to the lowest level.

Compliance Methods: List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the permit term described above. Also describe and cross-reference these compliance methods.

To describe monitoring, indicate the monitoring device, what is being monitored, averaging time, frequency, and cross-reference the permit term. To describe recordkeeping, describe the records kept, collection frequency, and cross-reference the permit term. Please indicate whether monitoring data, results, or if compliance records are be kept on-site rather than reported. To describe reporting requirements, describe what is reported, when it is reported, and cross-reference the permit term.

The citation or cross-reference here must unambiguously identify the requirement to the lowest level.

Compliance Status: For each permit requirement and its associated compliance methods, indicate whether there was intermittent or continuous compliance (check one) during the reporting period. You should consider all available information or knowledge that you have when evaluating this, including compliance methods required by the permit and "credible evidence" (e.g., non-reference test methods and information "readily available" to you). You are always free to include written explanations and other information to clarify your conclusion regarding compliance status.

You must include permit terms that were not effective or not applicable (e.g., future-effective requirements, compliance options, and alternative scenarios). You may certify to continuous compliance for these if there is no evidence of noncompliance.

Absent evidence to the contrary, you may certify continuous compliance based on the data provided by the compliance methods, provided you did not fail to perform them and there were no unexcused deviations. Any failure to meet any permit term for any period of time indicates intermittent compliance. You may also indicate "undetermined compliance," if you include the reason.

Section C (Deviations From Permit Terms and Conditions)

Summarize all deviations from permit terms that occurred since the last compliance certification. They may have been reported previously in-writing or they may be reported concurrently with this certification. Also include any deviations but have not yet been reported in writing.

Copy this page as many times as necessary to include all deviations that occurred during the reporting period for this compliance certification.

Deviations occur when any permit term is not met, including emission limitations, standards, monitoring, recordkeeping, reporting and other requirements. For a more detailed explanation of the term "deviation," see the instructions for Form ***SIXMON***. A deviation is not necessarily a violation. Violations are determined by EPA (or its delegate Agency).

You may cross-reference deviations previously reported (e.g., in 6-month monitoring reports).

You must indicate whether each deviation is a "possible exception to compliance." This is a deviation that occurs when compliance is required. A deviation that is not a "possible exception to compliance" is one that occurs when compliance is not required or it is excused by another permit term. If you indicate that a deviation is not a possible exception to compliance, briefly explain and cross-reference the permit term that allows or excuses it. Also, deviations for which the permit provides an affirmative defense (e.g., emergencies) must be identified as "possible exception to compliance" because only the permitting authority may determine if the affirmative defense applies.

If the cross-reference a deviation report that does not contain all the information requested here, you must supplement it accordingly.

You may list multiple emission units if they all had the same deviation during the same time periods. In addition, for deviations that impose requirements to the permitted facility as a whole or to all units at your facility, you may enter "facility-wide" in the emissions unit column.

You may indicate continuous periods of deviation that span multiple days in a single entry. Use the 24-hour clock (equivalent to military time) for reporting these times (e.g., the day starts and ends at midnight, 12 a.m., or 00:00 in military time.

Specify the date when the written deviation report was submitted to the permitting authority. Leave the date field blank if you did not submit a written deviation report during the reporting period covered by the six-month monitoring report (whether required to do so or not). It is a deviation to fail to submit a required

deviation report.

Form CTAC (Certification of Truth, Accuracy, and Completeness by Responsible Official)

You must complete form **CTAC** and attach it to this annual compliance certification.

Washington Gas - Rockville Facility
Monthly Gas Usage by Meter

Meter[1,2]	Natural Gas Usage (scf)											
	2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Emergency Generator	20,700	10,900	8,100	12,900	13,800	7,800	74,000	17,200	11,800	13,400	28,600	11,600
Engine Room	1,176,000	286,000	275,000	0	0	0	0	0	0	0	1,118,000	769,000
Main Station	6,091,000	4,865,000	5,000,000	12,000	14,000	8,000	67,000	16,000	11,000	13,000	2,563,000	5,105,000
Westmore Line Heater #1	176,200	113,200	126,900	109,900	94,000	46,400	99,800	92,100	66,000	63,200	74,000	121,900
Westmore Line Heater #2	151,900	99,900	111,300	86,700	71,500	35,600	73,700	68,400	52,600	53,600	55,900	90,500
Columbia Line Heater #1	604,800	620,300	607,600	407,100	166,300	91,800	40,800	60,200	67,600	218,200	360,000	576,900
Columbia Line Heater #2	530,800	492,100	474,100	290,500	137,400	65,800	36,900	28,100	8,300	152,100	248,600	382,500

1. Natural Gas meter readings are obtained from Salesforce.com data reports for the Rockville facility. Readings are recorded daily for each meter.
2. The natural gas meters for the Engine Room and Main Station each serve multiple units.

Washington Gas - Rockville Facility
Monthly Gas Usage by Equipment

Equipment[1]	Natural Gas Usage (scf) 2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Emergency Generator	20,700	10,900	8,100	12,900	13,800	7,800	74,000	17,200	11,800	13,400	28,600	11,600
Worthington Compressor Unit #1	240,840	56,304	30,437	-	-	-	-	-	-	-	264,789	126,472
Worthington Compressor Unit #2	195,873	56,304	37,646	-	-	-	-	-	-	-	276,039	129,448
Worthington Compressor Unit #3	234,743	55,664	40,850	-	-	-	-	-	-	-	267,385	132,424
Worthington Compressor Unit #4	236,267	48,626	43,252	-	-	-	-	-	-	-	250,079	130,936
Worthington Compressor Unit #5	100,604	24,313	44,053	-	-	-	-	-	-	-	20,768	92,250
Ingersoll-Rand Compressor Unit #6	167,673	44,787	78,762	-	-	-	-	-	-	-	38,940	157,470
Erie City Iron Works Boiler #6	33,589	506,786	38,875	12,000	-	-	-	-	-	-	88,199	265,226
Erie City Iron Works Boiler #8	2,605,955	1,544,478	2,195,508	0	-	-	-	-	-	-	55,253	203,721
Cleaver-Brooks Boiler #9	3,446,095	2,813,735	2,765,617	0	-	-	-	-	-	-	2,402,190	4,636,054
Cleaver-Brooks Boiler #10	5,362	0	0	0	-	-	-	-	-	-	17,358	0
Westmore Line Heater #1	176,200	113,200	126,900	109,900	94,000	46,400	99,800	92,100	66,000	63,200	74,000	121,900
Westmore Line Heater #2	151,900	99,900	111,300	86,700	71,500	35,600	73,700	68,400	52,600	53,600	55,900	90,500
Columbia Line Heater #1	604,800	620,300	607,600	407,100	166,300	91,800	40,800	60,200	67,600	218,200	360,000	576,900
Columbia Line Heater #2	530,800	492,100	474,100	290,500	137,400	65,800	36,900	28,100	8,300	152,100	248,600	382,500

1. Natural gas usage for units associated with the Engine Room and Main Station meters are calculated using a ratio of operating hours and heat input capacities.

Washington Gas - Rockville Facility
Monthly Hours

Equipment[1,2]		Hours 2022											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Emergency Generator	Emergency Generator	7	4	2	5	4	3	24	6	4	4	10	4
Worthington Compressor Unit #1	Engine Room	32	9	4	0	0	0	0	0	0	0	31	17
Worthington Compressor Unit #2	Engine Room	26	9	5	0	0	0	0	0	0	0	32	17
Worthington Compressor Unit #3	Engine Room	31	9	5	0	0	0	0	0	0	0	31	18
Worthington Compressor Unit #4	Engine Room	31	8	5	0	0	0	0	0	0	0	29	18
Worthington Compressor Unit #5	Engine Room	13	4	6	0	0	0	0	0	0	0	2	12
Ingersoll-Rand Compressor Unit #6	Engine Room	13	4	6	0	0	0	0	0	0	0	3	13
Erie City Iron Works Boiler #6	Main Station	4	59	5	0	0	0	0	0	0	0	10	28
Erie City Iron Works Boiler #8	Main Station	301	185	259	0	0	0	0	0	0	0	6	22
Cleaver-Brooks Boiler #9	Main Station	331	280	272	0	0	0	0	0	0	0	224	419
Cleaver-Brooks Boiler #10	Main Station	3	0	0	0	0	0	0	0	0	0	11	0
Westmore Line Heater #1	Westmore Line Heater #1	26	16	18	16	14	7	15	13	10	9	11	18
Westmore Line Heater #2	Westmore Line Heater #2	22	15	16	13	10	5	11	10	8	8	8	13
Columbia Line Heater #1	Columbia Line Heater #1	88	90	89	59	24	13	6	9	10	32	52	84
Columbia Line Heater #2	Columbia Line Heater #2	77	72	69	42	20	10	5	4	1	22	36	56

1. Operating hour readings are obtained from Salesforce.com data reports for the Rockville facility. Readings are recorded daily for each unit.

2. Operating hours for Westmore Line Heater #1, Westmore Line Heater #2, Columbia Line Heater #1, and Columbia Line Heater #2 are calculated based on each unit's natural gas usage and heating capacity.

Washington Gas - Rockville Facility
Monthly Emissions

Equipment[1]	NO_X Emissions (tons)											
	2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Emergency Generator	5.31E-02	3.04E-02	1.52E-02	3.80E-02	3.04E-02	2.28E-02	1.82E-01	4.55E-02	3.04E-02	3.04E-02	7.59E-02	3.04E-02
Worthington Compressor Unit #1	1.97E-01	5.48E-02	2.37E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.91E-01	1.06E-01
Worthington Compressor Unit #2	1.60E-01	5.48E-02	2.93E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.99E-01	1.08E-01
Worthington Compressor Unit #3	1.92E-01	5.42E-02	3.18E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.93E-01	1.11E-01
Worthington Compressor Unit #4	1.93E-01	4.74E-02	3.36E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.80E-01	1.10E-01
Worthington Compressor Unit #5	8.22E-02	2.37E-02	3.43E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.50E-02	7.73E-02
Ingersoll-Rand Compressor Unit #6	1.37E-01	4.36E-02	6.13E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.80E-02	1.32E-01
Erie City Iron Works Boiler #6	6.56E-03	1.02E-01	7.76E-03	1.73E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.67E-02	4.87E-02
Erie City Iron Works Boiler #8	5.09E-01	3.12E-01	4.39E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.05E-02	3.74E-02
Cleaver-Brooks Boiler #9	6.73E-01	5.69E-01	5.52E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.56E-01	8.51E-01
Cleaver-Brooks Boiler #10	1.05E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.29E-03	0.00E+00
Westmore Line Heater #1	8.81E-03	5.66E-03	6.35E-03	5.50E-03	4.70E-03	2.32E-03	4.99E-03	4.61E-03	3.30E-03	3.16E-03	3.70E-03	6.10E-03
Westmore Line Heater #2	7.60E-03	5.00E-03	5.57E-03	4.34E-03	3.58E-03	1.78E-03	3.69E-03	3.42E-03	2.63E-03	2.68E-03	2.80E-03	4.53E-03
Columbia Line Heater #1	3.02E-02	3.10E-02	3.04E-02	2.04E-02	8.32E-03	4.59E-03	2.04E-03	3.01E-03	3.38E-03	1.09E-02	1.80E-02	2.88E-02
Columbia Line Heater #2	2.65E-02	2.46E-02	2.37E-02	1.45E-02	6.87E-03	3.29E-03	1.85E-03	1.41E-03	4.15E-04	7.61E-03	1.24E-02	1.91E-02

1. Emission factors for each unit are obtained from AP-42 (Sections 1.4 and 3.2) as appropriate for each type of unit.

Washington Gas - Rockville Facility
Monthly Emissions

Equipment[1]	CO Emissions (tons) 2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Emergency Generator	4.17E-03	2.39E-03	1.19E-03	2.98E-03	2.39E-03	1.79E-03	1.43E-02	3.58E-03	2.39E-03	2.39E-03	5.96E-03	2.39E-03
Worthington Compressor Unit #1	1.55E-02	4.31E-03	1.86E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.50E-02	8.32E-03
Worthington Compressor Unit #2	1.26E-02	4.31E-03	2.30E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.56E-02	8.52E-03
Worthington Compressor Unit #3	1.51E-02	4.26E-03	2.50E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.51E-02	8.71E-03
Worthington Compressor Unit #4	1.52E-02	3.72E-03	2.64E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.41E-02	8.61E-03
Worthington Compressor Unit #5	6.46E-03	1.86E-03	2.69E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.17E-03	6.07E-03
Ingersoll-Rand Compressor Unit #6	1.08E-02	3.43E-03	4.81E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.20E-03	1.04E-02
Erie City Iron Works Boiler #6	5.51E-03	8.61E-02	6.52E-03	1.45E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.41E-02	4.09E-02
Erie City Iron Works Boiler #8	4.27E-01	2.62E-01	3.68E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.81E-03	3.14E-02
Cleaver-Brooks Boiler #9	5.65E-01	4.78E-01	4.64E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.83E-01	7.14E-01
Cleaver-Brooks Boiler #10	8.79E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.77E-03	0.00E+00
Westmore Line Heater #1	7.40E-03	4.75E-03	5.33E-03	4.62E-03	3.95E-03	1.95E-03	4.19E-03	3.87E-03	2.77E-03	2.65E-03	3.11E-03	5.12E-03
Westmore Line Heater #2	6.38E-03	4.20E-03	4.67E-03	3.64E-03	3.00E-03	1.50E-03	3.10E-03	2.87E-03	2.21E-03	2.25E-03	2.35E-03	3.80E-03
Columbia Line Heater #1	2.54E-02	2.61E-02	2.55E-02	1.71E-02	6.98E-03	3.86E-03	1.71E-03	2.53E-03	2.84E-03	9.16E-03	1.51E-02	2.42E-02
Columbia Line Heater #2	2.23E-02	2.07E-02	1.99E-02	1.22E-02	5.77E-03	2.76E-03	1.55E-03	1.18E-03	3.49E-04	6.39E-03	1.04E-02	1.61E-02

1. Emission factors for each unit are obtained from AP-42 (Sections 1.4 and 3.2) as appropriate for each type of unit.

Washington Gas - Rockville Facility
Monthly Emissions

Equipment[1]	SO_X Emissions (tons) 2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Emergency Generator	2.11E-05	1.20E-05	6.02E-06	1.50E-05	1.20E-05	9.03E-06	7.22E-05	1.81E-05	1.20E-05	1.20E-05	3.01E-05	1.20E-05
Worthington Compressor Unit #1	7.80E-05	2.17E-05	9.38E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	7.56E-05	4.20E-05
Worthington Compressor Unit #2	6.35E-05	2.17E-05	1.16E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	7.88E-05	4.30E-05
Worthington Compressor Unit #3	7.61E-05	2.15E-05	1.26E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	7.63E-05	4.40E-05
Worthington Compressor Unit #4	7.66E-05	1.88E-05	1.33E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	7.14E-05	4.35E-05
Worthington Compressor Unit #5	3.26E-05	9.38E-06	1.36E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.93E-06	3.06E-05
Ingersoll-Rand Compressor Unit #6	5.43E-05	1.73E-05	2.43E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.11E-05	5.23E-05
Erie City Iron Works Boiler #6	3.93E-05	6.15E-04	4.66E-05	1.04E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.00E-04	2.92E-04
Erie City Iron Works Boiler #8	3.05E-03	1.87E-03	2.63E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.29E-05	2.24E-04
Cleaver-Brooks Boiler #9	4.04E-03	3.41E-03	3.31E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.74E-03	5.10E-03
Cleaver-Brooks Boiler #10	6.28E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.98E-05	0.00E+00
Westmore Line Heater #1	5.29E-05	3.40E-05	3.81E-05	3.30E-05	2.82E-05	1.39E-05	2.99E-05	2.76E-05	1.98E-05	1.90E-05	2.22E-05	3.66E-05
Westmore Line Heater #2	4.56E-05	3.00E-05	3.34E-05	2.60E-05	2.15E-05	1.07E-05	2.21E-05	2.05E-05	1.58E-05	1.61E-05	1.68E-05	2.72E-05
Columbia Line Heater #1	1.81E-04	1.86E-04	1.82E-04	1.22E-04	4.99E-05	2.75E-05	1.22E-05	1.81E-05	2.03E-05	6.55E-05	1.08E-04	1.73E-04
Columbia Line Heater #2	1.59E-04	1.48E-04	1.42E-04	8.72E-05	4.12E-05	1.97E-05	1.11E-05	8.43E-06	2.49E-06	4.56E-05	7.46E-05	1.15E-04

1. Emission factors for each unit are obtained from AP-42 (Sections 1.4 and 3.2) as appropriate for each type of unit.

Washington Gas - Rockville Facility
Monthly Emissions

Equipment[1]	VOC Emissions (tons) 2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Emergency Generator	1.58E-03	9.02E-04	4.51E-04	1.13E-03	9.02E-04	6.77E-04	5.41E-03	1.35E-03	9.02E-04	9.02E-04	2.26E-03	9.02E-04
Worthington Compressor Unit #1	5.85E-03	1.63E-03	7.04E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.67E-03	3.15E-03
Worthington Compressor Unit #2	4.76E-03	1.63E-03	8.70E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.91E-03	3.22E-03
Worthington Compressor Unit #3	5.70E-03	1.61E-03	9.44E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.72E-03	3.30E-03
Worthington Compressor Unit #4	5.74E-03	1.41E-03	1.00E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.35E-03	3.26E-03
Worthington Compressor Unit #5	2.44E-03	7.04E-04	1.02E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.44E-04	2.30E-03
Ingersoll-Rand Compressor Unit #6	4.07E-03	1.30E-03	1.82E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.33E-04	3.92E-03
Erie City Iron Works Boiler #6	3.61E-04	5.64E-03	4.27E-04	9.49E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	9.21E-04	2.68E-03
Erie City Iron Works Boiler #8	2.80E-02	1.72E-02	2.41E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.77E-04	2.06E-03
Cleaver-Brooks Boiler #9	3.70E-02	3.13E-02	3.04E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.51E-02	4.68E-02
Cleaver-Brooks Boiler #10	5.76E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.81E-04	0.00E+00
Westmore Line Heater #1	4.85E-04	3.11E-04	3.49E-04	3.02E-04	2.59E-04	1.28E-04	2.74E-04	2.53E-04	1.82E-04	1.74E-04	2.04E-04	3.35E-04
Westmore Line Heater #2	4.18E-04	2.75E-04	3.06E-04	2.38E-04	1.97E-04	9.79E-05	2.03E-04	1.88E-04	1.45E-04	1.47E-04	1.54E-04	2.49E-04
Columbia Line Heater #1	1.66E-03	1.71E-03	1.67E-03	1.12E-03	4.57E-04	2.52E-04	1.12E-04	1.66E-04	1.86E-04	6.00E-04	9.90E-04	1.59E-03
Columbia Line Heater #2	1.46E-03	1.35E-03	1.30E-03	7.99E-04	3.78E-04	1.81E-04	1.01E-04	7.73E-05	2.28E-05	4.18E-04	6.84E-04	1.05E-03

1. Emission factors for each unit are obtained from AP-42 (Sections 1.4 and 3.2) as appropriate for each type of unit.

Washington Gas - Rockville Facility
Monthly Emissions

Equipment[1]	PM Filterable Emissions (tons)											
	2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Emergency Generator	1.00E-06	5.74E-07	2.87E-07	7.17E-07	5.74E-07	4.30E-07	3.44E-06	8.60E-07	5.74E-07	5.74E-07	1.43E-06	5.74E-07
Worthington Compressor Unit #1	3.72E-06	1.04E-06	4.47E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.60E-06	2.00E-06
Worthington Compressor Unit #2	3.02E-06	1.04E-06	5.53E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.75E-06	2.05E-06
Worthington Compressor Unit #3	3.62E-06	1.02E-06	6.00E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.64E-06	2.09E-06
Worthington Compressor Unit #4	3.65E-06	8.94E-07	6.36E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.40E-06	2.07E-06
Worthington Compressor Unit #5	1.55E-06	4.47E-07	6.47E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.82E-07	1.46E-06
Ingersoll-Rand Compressor Unit #6	2.59E-06	8.24E-07	1.16E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.30E-07	2.49E-06
Erie City Iron Works Boiler #6	1.25E-04	1.95E-03	1.48E-04	3.28E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.18E-04	9.25E-04
Erie City Iron Works Boiler #8	9.67E-03	5.93E-03	8.33E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.99E-04	7.10E-04
Cleaver-Brooks Boiler #9	1.28E-02	1.08E-02	1.05E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	8.66E-03	1.62E-02
Cleaver-Brooks Boiler #10	1.99E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.26E-05	0.00E+00
Westmore Line Heater #1	1.67E-04	1.08E-04	1.21E-04	1.04E-04	8.93E-05	4.41E-05	9.48E-05	8.75E-05	6.27E-05	6.00E-05	7.03E-05	1.16E-04
Westmore Line Heater #2	1.44E-04	9.49E-05	1.06E-04	8.24E-05	6.79E-05	3.38E-05	7.00E-05	6.50E-05	5.00E-05	5.09E-05	5.31E-05	8.60E-05
Columbia Line Heater #1	5.75E-04	5.89E-04	5.77E-04	3.87E-04	1.58E-04	8.72E-05	3.88E-05	5.72E-05	6.42E-05	2.07E-04	3.42E-04	5.48E-04
Columbia Line Heater #2	5.04E-04	4.67E-04	4.50E-04	2.76E-04	1.31E-04	6.25E-05	3.51E-05	2.67E-05	7.89E-06	1.44E-04	2.36E-04	3.63E-04

1. Emission factors for each unit are obtained from AP-42 (Sections 1.4 and 3.2) as appropriate for each type of unit.

Washington Gas - Rockville Facility
Monthly Emissions

Equipment[1]	PM Condensible Emissions (tons)											
	2022											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Emergency Generator	1.29E-04	7.37E-05	3.69E-05	9.22E-05	7.37E-05	5.53E-05	4.42E-04	1.11E-04	7.37E-05	7.37E-05	1.84E-04	7.37E-05
Worthington Compressor Unit #1	4.78E-04	1.33E-04	5.75E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.63E-04	2.57E-04
Worthington Compressor Unit #2	3.89E-04	1.33E-04	7.11E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.83E-04	2.63E-04
Worthington Compressor Unit #3	4.66E-04	1.32E-04	7.71E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.67E-04	2.69E-04
Worthington Compressor Unit #4	4.69E-04	1.15E-04	8.17E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.37E-04	2.66E-04
Worthington Compressor Unit #5	2.00E-04	5.75E-05	8.32E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.63E-05	1.88E-04
Ingersoll-Rand Compressor Unit #6	3.33E-04	1.06E-04	1.49E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.81E-05	3.20E-04
Erie City Iron Works Boiler #6	3.74E-04	5.84E-03	4.43E-04	9.84E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	9.54E-04	2.77E-03
Erie City Iron Works Boiler #8	2.90E-02	1.78E-02	2.50E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.98E-04	2.13E-03
Cleaver-Brooks Boiler #9	3.83E-02	3.24E-02	3.15E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.60E-02	4.85E-02
Cleaver-Brooks Boiler #10	5.97E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.88E-04	0.00E+00
Westmore Line Heater #1	5.02E-04	3.23E-04	3.62E-04	3.13E-04	2.68E-04	1.32E-04	2.84E-04	2.62E-04	1.88E-04	1.80E-04	2.11E-04	3.47E-04
Westmore Line Heater #2	4.33E-04	2.85E-04	3.17E-04	2.47E-04	2.04E-04	1.01E-04	2.10E-04	1.95E-04	1.50E-04	1.53E-04	1.59E-04	2.58E-04
Columbia Line Heater #1	1.72E-03	1.77E-03	1.73E-03	1.16E-03	4.74E-04	2.62E-04	1.16E-04	1.72E-04	1.93E-04	6.22E-04	1.03E-03	1.64E-03
Columbia Line Heater #2	1.51E-03	1.40E-03	1.35E-03	8.28E-04	3.92E-04	1.88E-04	1.05E-04	8.01E-05	2.37E-05	4.33E-04	7.09E-04	1.09E-03

1. Emission factors for each unit are obtained from AP-42 (Sections 1.4 and 3.2) as appropriate for each type of unit.

Washington Gas - Rockville Facility
Annual Emissions

Equipment	2022								
	Emissions (tpy)								
	NO_X	CO	SO_X	VOC	PM Filterable	PM Condensable	CO2	CH4	N2O
Emergency Generator	5.84E-01	4.59E-02	2.32E-04	1.74E-02	1.10E-05	1.42E-03	1.58E+01	1.79E-01	0.00E+00
Worthington Compressor Unit #1	5.72E-01	4.49E-02	2.27E-04	1.70E-02	1.08E-05	1.39E-03	1.54E+01	1.75E-01	0.00E+00
Worthington Compressor Unit #2	5.51E-01	4.33E-02	2.19E-04	1.64E-02	1.04E-05	1.34E-03	1.49E+01	1.69E-01	0.00E+00
Worthington Compressor Unit #3	5.81E-01	4.57E-02	2.30E-04	1.73E-02	1.10E-05	1.41E-03	1.57E+01	1.78E-01	0.00E+00
Worthington Compressor Unit #4	5.64E-01	4.43E-02	2.23E-04	1.68E-02	1.07E-05	1.37E-03	1.52E+01	1.73E-01	0.00E+00
Worthington Compressor Unit #5	2.32E-01	1.83E-02	9.21E-05	6.91E-03	4.39E-06	5.64E-04	6.26E+00	7.12E-02	0.00E+00
Ingersoll-Rand Compressor Unit #6	4.02E-01	3.16E-02	1.59E-04	1.19E-02	7.59E-06	9.76E-04	1.08E+01	1.23E-01	0.00E+00
Erie City Iron Works Boiler #6	1.82E-01	1.53E-01	1.09E-03	1.00E-02	3.47E-03	1.04E-02	2.19E+02	4.19E-03	4.01E-03
Erie City Iron Works Boiler #8	1.31E+00	1.10E+00	7.84E-03	7.19E-02	2.48E-02	7.45E-02	1.57E+03	3.01E-02	2.88E-02
Cleaver-Brooks Boiler #9	3.10E+00	2.60E+00	1.86E-02	1.71E-01	5.89E-02	1.77E-01	3.72E+03	7.13E-02	6.82E-02
Cleaver-Brooks Boiler #10	4.34E-03	3.65E-03	2.60E-05	2.39E-04	8.25E-05	2.47E-04	5.21E+00	9.98E-05	9.55E-05
Westmore Line Heater #1	5.92E-02	4.97E-02	3.55E-04	3.25E-03	1.12E-03	3.37E-03	7.10E+01	1.36E-03	1.30E-03
Westmore Line Heater #2	4.76E-02	4.00E-02	2.85E-04	2.62E-03	9.04E-04	2.71E-03	5.71E+01	1.09E-03	1.05E-03
Columbia Line Heater #1	1.91E-01	1.61E-01	1.15E-03	1.05E-02	3.63E-03	1.09E-02	2.29E+02	4.39E-03	4.20E-03
Columbia Line Heater #2	1.42E-01	1.20E-01	8.54E-04	7.83E-03	2.70E-03	8.11E-03	1.71E+02	3.27E-03	3.13E-03
Total	**8.522**	**4.503**	**3.16E-02**	**0.381**	**0.096**	**0.295**	**6.14E+03**	**1.18E+00**	**1.11E-01**

1. PM Filterable = PM10 Filterable = PM2.5 Filterable

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

   Continuous compliance. All construction and repairs at the facility that would cause excess dust or particulate matter would be conducted using established best management procedures to minimize the occurrence of dust and particulate matter.

2. Open Burning

   Continuous compliance. No open burning occurred at the facility.

3. Air Pollution Episode (N/A)

   Continuous compliance. No request or requirement to prepare standby emission reduction plans by the Department.

4. Report of Excess Emissions and Deviations
   (All deviations from permit requirements should be clearly identified in quarterly monitoring reports.)

   Continuous compliance. No deviations have occurred at the facility.

5. Accidental Release Provisions (if applicable)

   Continuous compliance. Facility not subject to 40 CFR Part 68

6. General Testing Requirements

   Continuous compliance. No testing requirements are included in this permit. The Department has not requested testing be completed.

7. Emissions Test Methods

   Continuous compliance. Emissions are reported based on calculations using prior approved emissions factors. Testing for emissions is not part of this permit.

8. Emission Certification Report

   Continuous compliance. Emissions reports are submitted by April 1st of each year, as required by this permit as well as semi-annual reports.

9. Compliance Certification Report

Continuous Compliance. Compliance Certifcation will be submitted to both the Department and EPA Region III.

10. Certification by Responsible Official

Continuous compliance. Certfication reports are signed by a responsible official.

11. Sampling and Emissions Testing Record Keeping

Continuous compliance. No testing or sampling is required by the permit.

12. General Record Keeping

Continuous compliance. All records are maintained on site at the location.

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

Not appliable.

14. Asbestos Provisions (if applicable)

Not applicable.

15. Ozone Depleting Regulations (if applicable)

Continous Compliance. No appliances containing ozone-depleting chemicals have been discarded

16. Acid Rain Permit (if applicable)

not applicable.

EPA United States Environmental Protection Agency

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

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

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

A. Responsible Official

Name: (Last) Boisvert (First) Laura (MI) ___

Title SVP Operations

Street or P.O. Box 6801 Industrial Rd.

City Springfield State VA ZIP 22151 - ____

Telephone (___) ___ - ____ Ext. ____ Facsimile (___) ___ - ____

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

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

Name (signed) Laura Boisvert

Name (typed) Laura Boisvert Date: 1/19/2023

FORM 2:

CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Facility Name: **Washington Gas Company - Rockville Station** **Facility ID#:** 031-01951 **Pollutant:** VOC **Calendar Year:** **2022**

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/dy	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
Emergency Generator 9-0800	1-03-006-03	Natural Gas	S	0.02	8.69	24	1	52	4	10.83	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Worthington Compressor Unit #1 9-0592	2-02-002-02	Natural Gas	S	0.02	8.50	24	1	22	4	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Worthington Compressor Unit #2 9-0593	2-02-002-02	Natural Gas	S	0.02	8.19	24	1	22	4	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Worthington Compressor Unit #3 9-0594	2-02-002-02	Natural Gas	S	0.02	8.64	24	1	22	4	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Worthington Compressor Unit #4 9-0595	2-02-002-02	Natural Gas	S	0.02	8.38	24	1	22	4	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Worthington Compressor Unit #5 9-0596	2-02-002-02	Natural Gas	S	0.01	6.91	24	1	17	2	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Ingersoll-Rand Compressor Unit #6 9-0597	2-02-002-02	Natural Gas	S	0.01	11.94	24	1	22	2	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Erie City Iron Works Boiler #6 1093	1-03-006-02	Natural Gas	S	0.01	4.01	24	1	22	5	4.56	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Erie City Iron Works Boiler #8 1092	1-03-006-02	Natural Gas	S	0.07	4.36	24	2	22	33	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Cleaver-Brooks Boiler #9 1096	1-03-006-02	Natural Gas	S	0.17	5.33	24	4	17	64	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Cleaver-Brooks Boiler #10 1097	1-03-006-02	Natural Gas	S	0.00	0.48	24	1	13	1	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Westmore Line Heater #1 5-1694	1-03-006-03	Natural Gas	S	0.00	0.81	24	1	43	8	0.91	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Westmore Line Heater #2 5-1695	1-03-006-03	Natural Gas	S	0.00	0.87	24	1	52	6	0.91	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Columbia Line Heater #1 5-2270	1-03-006-03	Natural Gas	S	0.01	0.88	24	1	52	24	0.91	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Columbia Line Heater #2 5-2271	1-03-006-03	Natural Gas	S	0.01	0.87	24	1	52	18	0.91	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Totals				**0.38**	**78.86**					**19.01**				

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

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

Emission Estimation Method

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

1/9/2008

FORM 2

CRITERIA AIR POLLUTANTS

Facility Name: **Washington Gas Company - Rockville Station** **Facility ID#:** 031-01951 **Pollutant:** NO_X **Calendar Year:** **2022**

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/dy	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
Emergency Generator 9-0800	1-03-006-03	Natural Gas	S	0.58	292.24	24	1	52	4	364.35	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Worthington Compressor Unit #1 9-0592	2-02-002-02	Natural Gas	S	0.57	285.97	24	1	22	4	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Worthington Compressor Unit #2 9-0593	2-02-002-02	Natural Gas	S	0.55	275.69	24	1	22	4	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Worthington Compressor Unit #3 9-0594	2-02-002-02	Natural Gas	S	0.58	290.64	24	1	22	4	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Worthington Compressor Unit #4 9-0595	2-02-002-02	Natural Gas	S	0.56	281.92	24	1	22	4	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Worthington Compressor Unit #5 9-0596	2-02-002-02	Natural Gas	S	0.23	232.39	24	1	17	2	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Ingersoll-Rand Compressor Unit #6 9-0597	2-02-002-02	Natural Gas	S	0.40	401.85	24	1	22	2	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Erie City Iron Works Boiler #6 1093	1-03-006-02	Natural Gas	S	0.18	72.95	24	1	22	5	82.82	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Erie City Iron Works Boiler #8 1092	1-03-006-02	Natural Gas	S	1.31	79.24	24	2	22	33	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Cleaver-Brooks Boiler #9 1096	1-03-006-02	Natural Gas	S	3.10	96.89	24	4	17	64	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Cleaver-Brooks Boiler #10 1097	1-03-006-02	Natural Gas	S	0.00	8.68	24	1	13	1	-	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Westmore Line Heater #1 5-1694	1-03-006-03	Natural Gas	S	0.06	14.80	24	1	43	8	16.47	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Westmore Line Heater #2 5-1695	1-03-006-03	Natural Gas	S	0.05	15.86	24	1	52	6	16.47	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Columbia Line Heater #1 5-2270	1-03-006-03	Natural Gas	S	0.19	15.92	24	1	52	24	16.47	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Columbia Line Heater #2 5-2271	1-03-006-03	Natural Gas	S	0.14	15.82	24	1	52	18	16.47	24	4/1/2022	9/30/2022	C3
			F	-	-					-				
Totals				**8.52**	**2380.86**					**513.05**				

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

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

Emission Estimation Method

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

01/09/08

FORM 2

CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Facility Name: **Washington Gas Company - Rockville Station** **Facility ID#:** 031-01951 **Pollutant:** SO_X **Calendar Year:** **2022**

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/dy	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
Emergency Generator 9-0800	1-03-006-03	Natural Gas	S	0.00	0.12	24	1	52	4					C3
			F	-	-									
Worthington Compressor Unit #1 9-0592	2-02-002-02	Natural Gas	S	0.00	0.11	24	1	22	4					C3
			F	-	-									
Worthington Compressor Unit #2 9-0593	2-02-002-02	Natural Gas	S	0.00	0.11	24	1	22	4					C3
			F	-	-									
Worthington Compressor Unit #3 9-0594	2-02-002-02	Natural Gas	S	0.00	0.12	24	1	22	4					C3
			F	-	-									
Worthington Compressor Unit #4 9-0595	2-02-002-02	Natural Gas	S	0.00	0.11	24	1	22	4					C3
			F	-	-									
Worthington Compressor Unit #5 9-0596	2-02-002-02	Natural Gas	S	0.00	0.09	24	1	17	2					C3
			F	-	-									
Ingersoll-Rand Compressor Unit #6 9-0597	2-02-002-02	Natural Gas	S	0.00	0.16	24	1	22	2					C3
			F	-	-									
Erie City Iron Works Boiler #6 1093	1-03-006-02	Natural Gas	S	0.00	0.44	24	1	22	5					C3
			F	-	-									
Erie City Iron Works Boiler #8 1092	1-03-006-02	Natural Gas	S	0.01	0.48	24	2	22	33					C3
			F	-	-									
Cleaver-Brooks Boiler #9 1096	1-03-006-02	Natural Gas	S	0.02	0.58	24	4	17	64					C3
			F	-	-									
Cleaver-Brooks Boiler #10 1097	1-03-006-02	Natural Gas	S	0.00	0.05	24	1	13	1					C3
			F	-	-									
Westmore Line Heater #1 5-1694	1-03-006-03	Natural Gas	S	0.00	0.09	24	1	43	8					C3
			F	-	-									
Westmore Line Heater #2 5-1695	1-03-006-03	Natural Gas	S	0.00	0.10	24	1	52	6					C3
			F	-	-									
Columbia Line Heater #1 5-2270	1-03-006-03	Natural Gas	S	0.00	0.10	24	1	52	24					C3
			F	-	-									
Columbia Line Heater #2 5-2271	1-03-006-03	Natural Gas	S	0.00	0.09	24	1	52	18					C3
			F	-	-									
Totals				**0.03**	**2.74**									

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

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Emission Estimation Method

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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 judgment

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

01/09/08

FORM 2

CRITERIA AIR POLLUTANTS

EMISSIONS CERTIFICATION REPORT

Facility Name: **Washington Gas Company - Rockville Station** **Facility ID#:** 031-01951 **Pollutant:** **CO** **Calendar Year:** **2022**

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/dy	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
Emergency Generator 9-0800	1-03-006-03	Natural Gas	S	0.05	22.96	24	1	52	4					C3
			F	-	-									
Worthington Compressor Unit #1 9-0592	2-02-002-02	Natural Gas	S	0.04	22.46	24	1	22	4					C3
			F	-	-									
Worthington Compressor Unit #2 9-0593	2-02-002-02	Natural Gas	S	0.04	21.66	24	1	22	4					C3
			F	-	-									
Worthington Compressor Unit #3 9-0594	2-02-002-02	Natural Gas	S	0.05	22.83	24	1	22	4					C3
			F	-	-									
Worthington Compressor Unit #4 9-0595	2-02-002-02	Natural Gas	S	0.04	22.15	24	1	22	4					C3
			F	-	-									
Worthington Compressor Unit #5 9-0596	2-02-002-02	Natural Gas	S	0.02	18.26	24	1	17	2					C3
			F	-	-									
Ingersoll-Rand Compressor Unit #6 9-0597	2-02-002-02	Natural Gas	S	0.03	31.57	24	1	22	2					C3
			F	-	-									
Erie City Iron Works Boiler #6 1093	1-03-006-02	Natural Gas	S	0.15	61.28	24	1	22	5					C3
			F	-	-									
Erie City Iron Works Boiler #8 1092	1-03-006-02	Natural Gas	S	1.10	66.56	24	2	22	33					C3
			F	-	-									
Cleaver-Brooks Boiler #9 1096	1-03-006-02	Natural Gas	S	2.60	81.39	24	4	17	64					C3
			F	-	-									
Cleaver-Brooks Boiler #10 1097	1-03-006-02	Natural Gas	S	0.00	7.29	24	1	13	1					C3
			F	-	-									
Westmore Line Heater #1 5-1694	1-03-006-03	Natural Gas	S	0.05	12.43	24	1	43	8					C3
			F	-	-									
Westmore Line Heater #2 5-1695	1-03-006-03	Natural Gas	S	0.04	13.32	24	1	52	6					C3
			F	-	-									
Columbia Line Heater #1 5-2270	1-03-006-03	Natural Gas	S	0.16	13.38	24	1	52	24					C3
			F	-	-									
Columbia Line Heater #2 5-2271	1-03-006-03	Natural Gas	S	0.12	13.29	24	1	52	18					C3
			F	-	-									
Totals				**4.50**	**430.82**									

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

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

Emission Estimation Method

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

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

01/09/08

Form 3: PM **Calendar Year: 2022**

EMISSIONS CERTIFICATION REPORT
Particulate Matter

Facility Name: **Washington Gas Company - Rockville Station** **Facility ID#:** **031-01951** **Pollutant:** **PM Filterable & PM Condensable**

Equipment Description / Registration Number	SCC Number	Fuel		PM - Filterable		PM 10 - Filterable		PM 2.5 - Filterable		PM - Condensable		Operation	Emissions
				tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	Days/yr	Methods
Emergency Generator 9-0800	1-03-006-03	Natural Gas	S	1.10E-05	5.52E-03	1.10E-05	5.52E-03	1.10E-05	5.52E-03	1.42E-03	7.10E-01	4	C3
			F	-	-	-	-	-	-	-	-		
Worthington Compressor Unit #1 9-0592	2-02-002-02	Natural Gas	S	1.08E-05	5.40E-03	1.08E-05	5.40E-03	1.08E-05	5.40E-03	1.39E-03	6.94E-01	4	C3
			F	-	-	-	-	-	-	-	-		
Worthington Compressor Unit #2 9-0593	2-02-002-02	Natural Gas	S	1.04E-05	5.21E-03	1.04E-05	5.21E-03	1.04E-05	5.21E-03	1.34E-03	6.69E-01	4	C3
			F	-	-	-	-	-	-	-	-		
Worthington Compressor Unit #3 9-0594	2-02-002-02	Natural Gas	S	1.10E-05	5.49E-03	1.10E-05	5.49E-03	1.10E-05	5.49E-03	1.41E-03	7.06E-01	4	C3
			F	-	-	-	-	-	-	-	-		
Worthington Compressor Unit #4 9-0595	2-02-002-02	Natural Gas	S	1.07E-05	5.33E-03	1.07E-05	5.33E-03	1.07E-05	5.33E-03	1.37E-03	6.85E-01	4	C3
			F	-	-	-	-	-	-	-	-		
Worthington Compressor Unit #5 9-0596	2-02-002-02	Natural Gas	S	4.39E-06	4.39E-03	4.39E-06	4.39E-03	4.39E-06	4.39E-03	5.64E-04	5.64E-01	2	C3
			F	-	-	-	-	-	-	-	-		
Ingersoll-Rand Compressor Unit #6 9-0597	2-02-002-02	Natural Gas	S	7.59E-06	7.59E-03	7.59E-06	7.59E-03	7.59E-06	7.59E-03	9.76E-04	9.76E-01	2	C3
			F	-	-	-	-	-	-	-	-		
Erie City Iron Works Boiler #6 1093	1-03-006-02	Natural Gas	S	3.47E-03	1.39E+00	3.47E-03	1.39E+00	3.47E-03	1.39E+00	1.04E-02	4.16E+00	5	C3
			F	-	-	-	-	-	-	-	-		
Erie City Iron Works Boiler #8 1092	1-03-006-02	Natural Gas	S	2.48E-02	1.51E+00	2.48E-02	1.51E+00	2.48E-02	1.51E+00	7.45E-02	4.52E+00	33	C3
			F	-	-	-	-	-	-	-	-		
Cleaver-Brooks Boiler #9 1096	1-03-006-02	Natural Gas	S	5.89E-02	1.84E+00	5.89E-02	1.84E+00	5.89E-02	1.84E+00	1.77E-01	5.52E+00	64	C3
			F	-	-	-	-	-	-	-	-		
Cleaver-Brooks Boiler #10 1097	1-03-006-02	Natural Gas	S	8.25E-05	1.65E-01	8.25E-05	1.65E-01	8.25E-05	1.65E-01	2.47E-04	4.95E-01	1	C3
			F	-	-	-	-	-	-	-	-		
Westmore Line Heater #1 5-1694	1-03-006-03	Natural Gas	S	1.12E-03	2.81E-01	1.12E-03	2.81E-01	1.12E-03	2.81E-01	3.37E-03	8.43E-01	8	C3
			F	-	-	-	-	-	-	-	-		
Westmore Line Heater #2 5-1695	1-03-006-03	Natural Gas	S	9.04E-04	3.01E-01	9.04E-04	3.01E-01	9.04E-04	3.01E-01	2.71E-03	9.04E-01	6	C3
			F	-	-	-	-	-	-	-	-		
Columbia Line Heater #1 5-2270	1-03-006-03	Natural Gas	S	3.63E-03	3.03E-01	3.63E-03	3.03E-01	3.63E-03	3.03E-01	1.09E-02	9.08E-01	24	C3
			F	-	-	-	-	-	-	-	-		
Columbia Line Heater #2 5-2271	1-03-006-03	Natural Gas	S	2.70E-03	3.01E-01	2.70E-03	3.01E-01	2.70E-03	3.01E-01	8.11E-03	9.02E-01	18	C3
			F	-	-	-	-	-	-	-	-		
TOTALS				**0.10**	**6.12**	**0.10**	**6.12**	**0.10**	**6.12**	**0.30**	**23.25**		

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.

Emissions Estimation Method

A1-US 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 based on best guess/engineering judgment
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

02/21/08

FORM 5:

Calendar Year: 2022

BILLABLE TOXIC AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Facility Name: Washington Gas Company - Rockville Station **Facility ID#:** 031-01951 **Pollutant:**

Chemical Name	CAS Number		Actual Emissions				Estimation Method
			Tons/yr	Lbs/day	Lbs/hr		
carbon disulfide	75-15-0	S F	--	0	0		C4
carbonyl sulfide	463-58-1	S F	--	0	0		C4
chlorine	7782-50-5	S F	--	0	0		C4
cyanide compounds	57-12-5	S F	--	0	0		C4
hydrochloric acid	7647-01-0	S F	--	0	0		C4
hydrogen fluoride	7664-39-3	S F	--	0	0		C4
methyl chloroform	71-55-6	S F	--	0	0		C4
methylene chloride	75-09-2	S F	--	0	0		C4
perchloroethylene	127-18-4	S F	--	0	0		C4
phosphine	7803-51-2	S F	--	0	0		C4
titanium tetrachloride	7550-45-0	S F	--	0	0		C4
Totals			**0**	**0**	**0**		

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

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
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurements
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by engineering judgment
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 standards

This form is to include only the chemicals identified.

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

03/09/09

Form 6: Greenhouse Gases

Caldendar Year: **2022**

GREENHOUSE GAS AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Pollutant: Carbon Dioxide (CO_2)
CO_2

Facility Name: **Washington Gas Company - Rockville Station** **Facility ID#:** **031-01951**

Equipment Description / Registration Number	Actual Emissions		
	tons/yr	lbs/day	lbs/hr
Emergency Generator 9-0800	16	7,876	328
Worthington Compressor Unit #1 9-0592	15	7,707	321
Worthington Compressor Unit #2 9-0593	15	7,430	310
Worthington Compressor Unit #3 9-0594	16	7,833	326
Worthington Compressor Unit #4 9-0595	15	7,598	317
Worthington Compressor Unit #5 9-0596	6	6,263	261
Ingersoll-Rand Compressor Unit #6 9-0597	11	10,830	451
Erie City Iron Works Boiler #6 1093	219	87,544	3,648
Erie City Iron Works Boiler #8 1092	1,569	95,087	3,962
Cleaver-Brooks Boiler #9 1096	3,721	116,271	4,845
Cleaver-Brooks Boiler #10 1097	5	10,417	434
Westmore Line Heater #1 5-1694	71	17,754	740
Westmore Line Heater #2 5-1695	57	19,032	793
Columbia Line Heater #1 5-2270	229	19,108	796
Columbia Line Heater #2 5-2271	171	18,981	791
TOTALS	6,136	439,731	18,322

This form must be used to report
Greenhouse gas emissions:
-- carbon dioxide (CO2)
-- methane (CH4)
-- nitrous oxide (N2O)
-- hydrofluorocarbons (HFCs)
-- perfluorocarbons (PFCs)
-- sulfur hexafluoride (SF6)
* Use a separate form for each pollutant.
* Please attach all calculations.

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

Form 6: Greenhouse Gases

Caldendar Year: **2022**

GREENHOUSE GAS AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Pollutant: Nitrous Oxide (N_2O)

N_2O

Facility Name: **Washington Gas Company - Rockville Station** **Facility ID#:** **031-01951**

Equipment Description / Registration Number	Actual Emissions		
	tons/yr	lbs/day	lbs/hr
Emergency Generator 9-0800	0.0E+00	0.0E+00	0.0E+00
Worthington Compressor Unit #1 9-0592	0.0E+00	0.0E+00	0.0E+00
Worthington Compressor Unit #2 9-0593	0.0E+00	0.0E+00	0.0E+00
Worthington Compressor Unit #3 9-0594	0.0E+00	0.0E+00	0.0E+00
Worthington Compressor Unit #4 9-0595	0.0E+00	0.0E+00	0.0E+00
Worthington Compressor Unit #5 9-0596	0.0E+00	0.0E+00	0.0E+00
Ingersoll-Rand Compressor Unit #6 9-0597	0.0E+00	0.0E+00	0.0E+00
Erie City Iron Works Boiler #6 1093	4.0E-03	1.6E+00	6.7E-02
Erie City Iron Works Boiler #8 1092	2.9E-02	1.7E+00	7.3E-02
Cleaver-Brooks Boiler #9 1096	6.8E-02	2.1E+00	8.9E-02
Cleaver-Brooks Boiler #10 1097	9.5E-05	1.9E-01	8.0E-03
Westmore Line Heater #1 5-1694	1.3E-03	3.3E-01	1.4E-02
Westmore Line Heater #2 5-1695	1.0E-03	3.5E-01	1.5E-02
Columbia Line Heater #1 5-2270	4.2E-03	3.5E-01	1.5E-02
Columbia Line Heater #2 5-2271	3.1E-03	3.5E-01	1.4E-02
TOTALS	1.1E-01	7.0E+00	2.9E-01

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

This form must be used to report
Greenhouse gas emissions:
-- carbon dioxide (CO2)
-- methane (CH4)
-- nitrous oxide (N2O)
-- hydrofluorocarbons (HFCs)
-- perfluorocarbons (PFCs)
-- sulfur hexafluoride (SF6)
* Use a separate form for each pollutant.
* Please attach all calculations.

Form 6: Greenhouse Gases

Calendar Year: **2022**

GREENHOUSE GAS AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT

Pollutant: Methane (CH_4)

CH_4

Facility Name: **Washington Gas Company - Rockville Station** **Facility ID#:** **031-01951**

Equipment Description / Registration Number	Actual Emissions		
	tons/yr	lbs/day	lbs/hr
Emergency Generator 9-0800	1.8E-01	8.9E+01	3.7E+00
Worthington Compressor Unit #1 9-0592	1.8E-01	8.9E+01	3.7E+00
Worthington Compressor Unit #2 9-0593	1.7E-01	8.9E+01	3.7E+00
Worthington Compressor Unit #3 9-0594	1.8E-01	8.9E+01	3.7E+00
Worthington Compressor Unit #4 9-0595	1.7E-01	8.9E+01	3.7E+00
Worthington Compressor Unit #5 9-0596	7.1E-02	1.8E+02	7.5E+00
Ingersoll-Rand Compressor Unit #6 9-0597	1.2E-01	1.8E+02	7.5E+00
Erie City Iron Works Boiler #6 1093	4.2E-03	7.2E+01	3.0E+00
Erie City Iron Works Boiler #8 1092	3.0E-02	1.1E+01	4.5E-01
Cleaver-Brooks Boiler #9 1096	7.1E-02	5.6E+00	2.3E-01
Cleaver-Brooks Boiler #10 1097	1.0E-04	3.6E+02	1.5E+01
Westmore Line Heater #1 5-1694	1.4E-03	4.5E+01	1.9E+00
Westmore Line Heater #2 5-1695	1.1E-03	6.0E+01	2.5E+00
Columbia Line Heater #1 5-2270	4.4E-03	1.5E+01	6.2E-01
Columbia Line Heater #2 5-2271	3.3E-03	2.0E+01	8.3E-01
TOTALS	1.2E+00	1.4E+03	5.8E+01

This form must be used to report
Greenhouse gas emissions:
-- carbon dioxide (CO2)
-- methane (CH4)
-- nitrous oxide (N2O)
-- hydrofluorocarbons (HFCs)
-- perfluorocarbons (PFCs)
-- sulfur hexafluoride (SF6)
* Use a separate form for each pollutant.
* Please attach all calculations.

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

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

VI .Application Completeness Checklist

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

Cover Page

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

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

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

Section 1 CERTIFICATION STATEMENTS

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

Section 2 FACILITY DESCRIPTION SUMMARY

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

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

✓( ) A plot plan of the entire facility.

✓( ) Emission Certification Report.

✓( ) General Emissions Information.

Section 3 EMISSIONS UNIT DESCRIPTIONS –

This section must be completed for each emissions unit.

Part A

✓ ( ) Emissions unit number.

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

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

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

Part B

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

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

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

Part C Not Applicable

( ) Emissions unit number.

( ) Permit to construct number.

( ) Emissions point number(s).

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

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

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

Part D Not Applicable

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

( ) Number assigned to each scenario.

( ) Emissions unit number.

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

Part E Not Applicable

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

( ) As an attachment, the date and results of the most recent compliance demonstration for each emission standard and/or emissions certification report with relevant supporting documentation.

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

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

Section 4 CONTROL EQUIPMENT Not Applicable

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

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

Section 5 SUMMARY SHEET OF POTENTIAL EMISSIONS Not Applicable

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

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

( ) Basis for all emission calculations.

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

( ) An explanation of the proposed exemption.

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

Section 7 COMPLIANCE SCHEDULE FOR NONCOMPLYING EMISSIONS UNITS Not Applicable

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

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

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

Attachment

(✓) Checklist of Insignificant Activities

( ) CAM Plan (If Applicable) Not Applicable