Maryland
Department of the Environment

Wes Moore, Governor
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary
Suzanne E. Dorsey, Deputy Secretary

Ms. Mary Hemati, EHS Manager
The Gill Corporation
1502 Quarry Dr.
Edgewood, MD, 21040

APR 1 1 2023

Dear Ms. Hemati:

Re: Renewal Part 70/ Title V Operating Permit 24-025-0423

Enclosed, please find the Renewal Part 70/Title V Operating Permit and Fact Sheet for the Gill Corporation facility located in Harford County, MD. The Permit will expire on November 30, 2027.

The Code of Maryland Regulations (COMAR) 26.11.03.11 states the following:

If the Department denies a Part 70 permit or issues it with terms and conditions that are objectionable to the applicant, the applicant may request that a contested case hearing be held regarding the permit. This request shall be made to the Department in writing not later than 15 days after the applicant receives notice that the permit has been denied or of the objectionable terms and conditions. The request shall include the basis for the request and refer to any objectionable terms and conditions.

Please note the following revised condition in the Permit under Section II, General Conditions, Number 5, Permit Renewal:

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

If you have any questions, please feel free to contact Ms. Susan Nash, permit engineer, at susan.nash@maryland.gov, or (410) 537-3230.

Sincerely,

Suna Yi Sariscak, Manager
Air Quality Permits Program
Air & Radiation Administration

SYS/jm

Enclosures

KEEP PERMIT AT SITE

CONTROL NO. B - 07386

Wes Moore
Governor

State of Maryland

Serena McIlwain
Secretary

DEPARTMENT OF THE ENVIRONMENT

Air and Radiation Administration
1800 Washington Boulevard, Suite 720
Baltimore, MD 21230

[ ] Construction Permit

[X] Part 70 Operating Permit

PERMIT NO. 24-025-0423

DATE ISSUED APR 1 9 2023

PERMIT FEE To be paid in accordance with COMAR 26.11.02.19B

EXPIRATION DATE November 30, 2027

LEGAL OWNER & ADDRESS

The Gill Corporation - Maryland
1502 Quarry Drive
Edgewood, MD 21040
Attn: Ms. Mary Hemati, EHS Manager

SITE

The Gill Corporation - Maryland
1502 Quarry Drive
Edgewood, MD 21040
AI # 11781

SOURCE DESCRIPTION

Honeycomb Core manufacturing plant.

This source is subject to the conditions described on the attached pages.

Program Manager

Director, Air and Radiation Administration

MDE/ARMA/PER.009 (REV. 10-08-03)

(NOT TRANSFERABLE)

THE GILL CORPORATION - MARYLAND
1502 QUARRY DRIVE
EDGEWOOD, MD 21040
PART 70 OPERATING PERMIT NO. 24-025-0423

SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

The Gill Corporation - Maryland (Gill) manufactures honeycomb core and corrugated core products for use in aircraft construction and related industries at the facility located on 1502 Quarry Drive in Edgewood, MD which is within the limits of Harford County. Gill is in Maryland Air Quality Region III. The primary SIC code for the facility is 3354.

The primary sources of air emissions at the facility include two honeycomb core manufacturing lines (EU-5 and EU-6) and one corrugated core manufacturing line (EU-7). Supporting operations include two (2) metal coil (aluminum foil) coating lines (EU-10 and EU-12), a small natural gas-fired boiler for process heat (EU-11), a phosphoric acid anodizing (PAA) line, and a Duracore coating line to clean and treat the aluminum foil prior to manufacturing.

2. FACILITY INVENTORY LIST

Emissions Unit Number	MDE Registration Number	Emissions Unit Name and Description	Date of Installation
EU – 5	025-0243-6-0299	Honeycomb Core Print Line No. 1	1999
EU – 6	025-0243-6-0300	Honeycomb Core Print Line No. 2	1999
EU – 7	025-0243-6-0301	Corrugated Core Manufacturing Line (with curing oven)	2000
EU – 10	025-0243-6-0367	Aluminum Foil Web Coating Line controlled by the regenerative thermal oxidizer associated with EU-12	2002 Modified 2022
EU – 11	025-0243-5-0286	One natural gas fired boiler rated at 4.2 MMBTU per hour	2007
EU – 12	025-0243-6-0493	Aluminum Foil Web Coating Line controlled by a regenerative thermal oxidizer	2014
EU-TBD	025-0243-6-0543	Corrugated Core Manufacturing Line	2021

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 b y (c.— g.) above.

19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION

[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

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

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

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

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 82.156.

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

16. ACID RAIN PERMIT

Not applicable

SECTION IV PLANT SPECIFIC CONDITIONS

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

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

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

Table IV – 1 (General Provisions)	
1.0	**General Facility Wide Provisions**: This table provides generally applicable provisions with regard to requirements for observations for visible emissions, implementation of good operating practices designed to minimize emissions of VOC, implementation of a VOC leak detection and repair program, stack testing, and record keeping and reporting. Provisions in this table may be superseded or modified by requirements in succeeding tables. INDEX: 1.1 Observations For Visible Emissions 1.2 Good Operating Practices Designed to Minimize Emissions of VOC 1.3 VOC Leak Detection and Repair 1.4 Stack Testing 1.5 Record Keeping and Reporting
1.1	**Observations For Visible Emissions**: Unless otherwise provided in the specific requirements for an affected emissions unit, whenever the Permittee is required to perform an observation for visible emissions the following shall apply:

Table IV – 1 (General Provisions)

A. Each required observation shall be performed when the affected source of emissions is in operation. If the affected source of emissions does not operate within the period during which an observation would otherwise be required, the Permittee shall not be required to make an observation of the affected emissions point for that period.

B. If the Permittee is required to observe an emissions point that is common to more than one source of emissions, the Permittee shall make the required observation when at least one of the sources of emissions is in operation. If none of the affected sources of emissions operate within the period during which an observation would otherwise be required, the Permittee shall not be required to make an observation of the emissions point for that period.

C. Observations shall be performed during daylight hours unless the Permittee obtains from the Department written approval to conduct observations of properly lighted emissions points during non-daylight hours.

D. Each required observation for visible emissions shall endure for at least one (1) minute.

E. The Permittee shall make a written or printable electronic record of each required observation for visible emissions, and each such record shall include identification of the observer, the date of the observation, the time at the start of the observation, the time at the end of the observation if the observation endures for more than 1 minute, and an account of the observer's findings during performance of the observation.

F. If visible emissions are found during an observation, the Permittee shall either initiate immediate shutdown of all installations contributing to the visible emissions or shall:

(1) inspect all process and/or control equipment with potential to contribute to the visible emissions. For combustion sources (e.g., fuel burning equipment), inspect all combustion control systems and all combustion operations with potential to contribute to the visible emissions;

Table IV – 1 (General Provisions)	
	(2) where practical, perform within 24 hours all repairs and/or adjustments to all process equipment, control equipment, combustion control systems and/or combustion sources necessary to eliminate visible emissions; and (3) make written records of any repairs and/or adjustments to process equipment, control equipment, combustion control systems and/or combustion sources that were necessary to eliminate visible emissions. G. If visible emissions have not been eliminated within 48 hours, the Permittee shall either: (1) conduct at least once per day EPA Reference Method 9 visible emissions evaluations for a period of at least 12 minutes per evaluation until visible emissions have been eliminated; or (2) shut down all equipment contributing to the visible emissions, and effect all maintenance and repairs necessary to re-establish operation without visible emissions before re-starting. **[Authority: COMAR 26.11.03.06C]**
1.2	**Good Operating Practices Designed to Minimize Emissions of VOC to Atmosphere:** Unless a portion of the facility is specifically exempted, the Permittee shall implement facility-wide "good operating practices" in accordance with COMAR 26.11.19.02I, and the following shall apply: A. "Good operating practices" shall include, at a minimum: (1) Provisions for training operators with regard to practices, procedures, and maintenance requirements that are consistent with equipment manufacturers' recommendations, and with requirements dictated by the Permittee's experiences with operation of equipment. The training shall include material concerning proper

Table IV – 1 (General Provisions)

maintenance procedures for air pollution control equipment;

(2) Maintenance of covers on containers and other vessels that are not in use and that contain VOC or VOC-bearing materials;

(3) Scheduling operations as much as practical to minimize color changes and material changes when applying VOC-bearing materials by spray application;

(4) Where practical, using high-volume-low-pressure (HVLP) spray-applicators or other high efficiency application methods for spray application of VOC-bearing materials; and

(5) Mixing and blending VOC-bearing materials, as much as practical, in closed containers, and implementing preventive measures designed to minimize emissions from products that contain VOC.

(6) Minimize spills of VOC-containing cleaning materials;

(7) Convey VOC-containing cleaning materials from one location to another in closed containers or pipelines; and

(8) Minimize VOC emissions from cleaning of storage, mixing, and conveying equipment.

B. "Good operating practices" shall be established in writing, shall be made available to the Department upon request, and shall be either included as part of an operator training program or posted where clearly visible to operators.

C. The Permittee shall take all reasonable precautions to prevent or minimize the discharge of VOC to atmosphere when cleaning process equipment and coating application equipment, including containers, vessels, tanks, lines, spray application devices, and pumps. Reasonable precautions for equipment cleanup shall include, at a minimum:

Table IV – 1 (General Provisions)

(1) Storing all waste materials, including VOC-contaminated cloth and paper, in closed containers;

(2) For frequently cleaned equipment, preparing written standard operating procedures that include, where practical, provisions for using non-VOC or low-VOC cleaning agents, and procedures designed to minimize the quantities of VOC-bearing cleaning materials used;

(3) Where practical, using enclosed spray-applicator cleaning methods, VOC-recycling systems, and other spray-applicator cleaning methods designed to reduce or eliminate VOC emissions; and

(4) Where practical, using detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines, containers, and process equipment.

D. With regard to storage and transfer of VOC, the Permittee shall at a minimum:

(1) Install conservation vents, or other vapor control measures designed to minimize standing losses, on each storage tank with a capacity of 2000 gallons or more in VOC service; and

(2) For stationary storage tanks with capacities greater than 10,000 gallons and less than 40,000 gallons that store VOC or VOC-bearing materials (excluding gasoline) with vapor pressures greater than 1.5 psia, use vapor balance, vapor control lines or other vapor control measures, whenever VOC are transferred from tank trucks into such tanks.

[Authority: COMAR 26.11.19.02I]

E. The Permittee shall maintain written descriptions of all "good operating practices" designed to minimize emissions of VOC from facility-wide operations. **[Authority: COMAR 26.11.19.02I]**

Table IV – 1 (General Provisions)	
1.3	**VOC Leak Detection and Repair:** Unless a portion of the facility is specifically exempted, the Permittee shall implement a facility-wide VOC leak detection and repair program in accordance with COMAR 26.11.19.16, and the following shall apply: A. The Permittee shall visually inspect for leaks, at least once per calendar month, all equipment and components in VOC service. If leaks are detected, the Permittee shall: (1) tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date that the leak was discovered, and the identity of the person who discovered the leak. The tag shall remain in place until the leak has been repaired; (2) initiate immediate action to repair all observed VOC leaks that can be repaired within 48 hours; (3) repair all other leaking components within fifteen (15) days of discovery. If a replacement part is needed, the part shall be ordered within three (3) days of discovery of the leak, and the leak shall be repaired with 48 hours of receipt of the part; and (4) maintain a supply of components and component parts, such as seals, gaskets, packing and pipe fittings, that are known to wear or corrode, or that otherwise need to be routinely replaced. B. Components that cannot be repaired as required because they are inaccessible, or that cannot be repaired during operation of an installation, shall be identified in a log and included within the facility's maintenance schedule for repair during the next outage of the installation. C. The Permittee shall conduct VOC leak detection inspections at least once per calendar month in accordance with COMAR 26.11.19.16.

Table IV – 1 (General Provisions)	
	D. The Permittee shall maintain VOC leak detection and repair logs that include identification of the persons who conducted the leak detection inspections, the dates on which the inspections were conducted, the findings during the inspections, a listing by tag identification number and a description of all leaks discovered, and the date and nature of all leak repairs effected. **[Authority: COMAR 26.11.19.16]**
1.4	**Stack Testing:** A. Unless otherwise provided in the specific requirements for an emissions unit, when the Permittee is required to perform stack testing the Permittee shall submit to the Department for approval a stack test protocol that includes: (1) the purpose of the stack testing; (2) a testing schedule that provides the projected dates and times of testing; (3) an account of all test methods and procedures to be employed during the testing program; (4) for the emissions source or sources to be tested, an account of the operating conditions that will be extant during the testing program; and (5) a description of operating data that will be collected during the testing periods. B. The required stack test protocol shall be submitted at least 30 days prior to performance of any testing, and testing shall not be conducted before the Department provides approval of the protocol. C. Results of all required stack tests shall be submitted to the Department in writing within 60 days of completion of the testing. **[Authority: COMAR 26.11.03.06C]**
1.5	**Record Keeping and Reporting Requirements:** A. Unless otherwise provided in the specific requirements for an emissions unit, the Permittee shall maintain at the facility for at

Table IV – 1 (General Provisions)	
	least five (5) years, and shall make available to the Department upon request, any record that the Permittee is required by this permit to establish. B. The Permittee shall maintain all records required by this permit in a format that is acceptable to the Department. A format adopted by the Permittee shall be considered acceptable until the Department provides the Permittee with written notice otherwise. C. Unless otherwise specified in this permit the Permittee shall maintain all required records either in writing or in a printable electronic form. **[Authority: COMAR 26.11.03.06C]**

Table IV – 2 (Print Lines & Corrugated Core Line)	
2.0	**Emissions Unit Number(s)** EU – 5: One (1) Honeycomb Core Manufacturing Line – Print Line No. 1 (ARA Registration Number 025-0423-6-0299) EU – 6: One (1) Honeycomb Core Manufacturing Line – Print Line No. 2 (ARA Registration Number 025-0423-6-0300) EU – 7: One (1) Corrugated Core Manufacturing Line with Curing Oven (ARA Registration Number 025-0423-6-0301) EU – TBD: One (1) Corrugated Core Manufacturing Line (ARA Registration Number 025-0423-6-0543)
2.1	**Applicable Standards/Limits:** A. Visible Emissions Limitations (1) **COMAR 26.11.06.02C(2)**, which requires that a person not cause or permit the discharge of emissions from any installation or building, other than water in uncombined form, which is visible to human observers. Exceptions: **COMAR 26.11.06.02A(2)** establishes that "the visible emissions standards in §C of this regulation do not

Table IV – 2 (Print Lines & Corrugated Core Line)

apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

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

(b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

(2) Operational Requirement - Exhaust gases from the corrugated core curing oven shall vent through a filter before discharge to atmosphere whenever the oven is used to cure adhesives that have the potential to cause visible emissions during the curing process. **[Authority: Permit-to-Construct Nos. 12-6-0299N, 6-0300N, 6-0301N issued 09/23/1998]**

3. Operational Requirement – The Permittee shall only use the following materials as lubricants in the corrugation lines unless the Permittee obtains prior approval from the Department to use alternate lubricants.

(a) Isopropyl Alcohol;

(b) Methanol;

(c) Acetone; and

(d) Methyl Acetate

[Authority: Registration Update on April 23, 2021 and Permit-to-Construct No. 6-0543 issued 02/15/2022]

4. Operational Requirement – The EU-TBD corrugation line shall be operated such that vapors from the applied lubricants are exhausted to a stack emission point on the roof of the building. **[Authority: Permit-to-Construct No. 025-0423-6-0543 issued 06/18/2021]**

Table IV – 2 (Print Lines & Corrugated Core Line)	
	B. Control of Particulate Matter **COMAR 26.11.06.03B(2)(a),** which limits the concentration of particulate matter in any process exhaust gases to not more than 0.03 grains per standard cubic foot of dry exhaust gas. C. Control of VOC **COMAR 26.11.19.15C(1)**, which requires that the Permittee reduce emissions of VOC from adhesive application operations in honeycomb core and corrugated core manufacturing processes in accordance with the following: (1) The Permittee shall not use an adhesive that contains more than 5.8 pounds of VOC per gallon (minus water) of adhesive applied in any honeycomb core or corrugated core installation that discharges more than 50 pounds of VOC per day. **[Authority: COMAR 26.11.19.15C(1)(a)]** (2) The Permittee shall not cause or permit the discharge of VOC emissions from any honeycomb core printing or corrugated core manufacturing installation in excess of 200 pounds per day. **[Authority: COMAR 26.11.19.15C(1)(b)]**
2.2	**Testing Requirements:** A. Visible Emissions Limitations See Monitoring, Recordkeeping, and Reporting Requirements. B. Control of Particulate Matter See Monitoring, Recordkeeping, and Reporting Requirements. C. Control of VOC See Monitoring, Recordkeeping, and Reporting Requirements.
2.3	**Monitoring Requirements:** A. Visible Emissions Limitations

Table IV – 2 (Print Lines & Corrugated Core Line)	
	On each day that the Permittee uses an adhesive that has the potential to cause visible emissions, the Permittee shall conduct observations for visible emissions at least once per day in accordance with Section 1.1 of Table IV-1. **[Authority: COMAR 26.11.03.06C]** B. Control of Particulate Matter See Recordkeeping and Reporting Requirements. C. Control of VOC See Recordkeeping and Reporting Requirements.
2.4	**Record Keeping Requirements:** A. Visible Emissions Limitations The Permittee shall maintain, in accordance with applicable requirements under Section 1.1 of Table IV-1, records of all observations for visible emissions. **[Authority: COMAR 26.11.03.06C]** B. Control of Particulate Matter The Permittee shall maintain all records in accordance with applicable requirements under Section 1.5 of Table IV-1 **[Authority: COMAR 26.11.03.06C]** C. Control of VOC The Permittee shall maintain the following records for the Honeycomb Core and Corrugated Core Manufacturing Lines: (1) Material Safety Data Sheets (MSDS), or other valid product specification documents, that include the VOC content of each adhesive used, as applied; (2) Daily consumption rates for each adhesive used; and

Table IV – 2 (Print Lines & Corrugated Core Line)	
	(3) Daily VOC emissions from each line, and the data and calculations used to determine those emissions. **[Authority: Permit-to-construct Nos. 12-6-0299N, 6-0300N, 6-0301N issued 09/23/1998]**
2.5	**Reporting Requirements:** A. Visible Emissions Limitations The Permittee shall report occurrences of visible emissions in accordance with conditions number 4 ("Report of Excess Emissions and Deviations"), and number 9 ("Compliance Certification Report"), of Section III – Plant Wide Conditions. B. Control of Particulate The Permittee shall report particulate matter emissions upon request by the Department. **[Authority: COMAR 26.11.03.06C]** C. Control of VOC The Permittee shall make available to the Department upon request any records that the Permittee is required to maintain for the honeycomb core and corrugated core manufacturing lines. **[Authority: COMAR 26.11.03.06C]**

Table IV – 3A (Aluminum Foil Web Coating Lines)	
3A.0	**Emissions Unit Number:** EU – 10: One (1) Aluminum Foil Web Coating Line Controlled by the Regenerative Thermal Oxidizer associated with EU-12 (ARA Registration No. 025-0423-6-0367) EU – 12: One (1) Aluminum Foil Web Coating Line Controlled by a Regenerative Thermal Oxidizer (ARA Registration No. 025-0423-6-0493)
3A.1	**Applicable Standards/Limits:** A. Visible Emissions Limitations: **COMAR 26.11.06.02C(2),** which requires that a person not cause or permit the discharge of emissions from any installation

or building, other than water in uncombined form, which is visible to human observers.

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

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

(b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

B. Control of VOC:

B1. **COMAR 26.11.19.05,** which limits the VOC content of any coating applied to the surface of a metal coil to no more than 2.6 lbs VOC/gal coating (minus water).

Alternative Compliance Method: **COMAR 26.11.19.02B(2)(b)(ii)** establishes that a person subject to a regulation in COMAR chapter 26.11.19 may comply with emissions standards in the chapter by using a control device that, when tested by approved test methods, results in an emissions reduction equal to or greater than the emissions reduction that would have been achieved by application of low VOC coatings or adhesives that meet applicable standards. **[Authority: Permit-to-Construct No. 025-0423-6-0367 and 025-0423-6-0493 issued 02/15/2022, and COMAR 26.11.19]**

B2. **40 CFR 60, Subparts A (NSPS General Provisions) and TT (NSPS for Metal Coil Coaters),** which requires an overall VOC emissions reduction from metal coil coating operations of at least 90%, and imposes testing, monitoring, record keeping and reporting requirements. **[Authority: Permit-to-Construct No. 025-0423-6-0367 and 025-0423-6-0493 issued 02/15/202, and 40 CFR §60.462(a)(3)]**

B3. Operational Requirement: The Permittee shall maintain permanent total enclosures (PTEs) to provide 100% capture of volatile emissions from each aluminum foil web coating line and exhaust all emissions to the Tann RTO prior to discharging to

the atmosphere. **[Authority: Permit-to-Construct No. 025-0423-6-0367 and 6-0493 issued 02/15/2022]**

B4. Operational Requirement: The Permittee shall utilize PTEs that meet all criteria included under Section 6 of EPA Reference Method 204 of 40 CFR 51, Appendix M to capture all VOC evaporated during web coating, flash -off and curing processes of the aluminum foil web coating lines and all exhaust gases from the PTEs shall be vented through a properly functioning RTO before discharge to atmosphere. At least once each calendar half, the Permittee shall use the procedures specified under Section 6 of EPA Reference Method 204 of 40 CFR 51, Appendix M to determine that the PTEs capture 100% of all VOC and organic HAP emissions from the aluminum foil web coating lines. **[Authority: Permit-to-Construct No. 025-0423-6-0367 and 6-0493 issued 02/15/2022]**

B5. Operational Requirement: The Permittee shall operate the aluminum foil web coating lines such that the regenerative thermal oxidizer control system consistently reduces VOC emissions from each coating used, to levels that are no greater than would be such levels if the coating, as applied, contained 2.6 lbs VOC/gallon of coating minus water. **[Authority: Permit-to-Construct No. 025-0423-6-0367 and 025-0423-6-0493 issued 02/15/2022, COMAR 26.11.19.05, and COMAR 26.11.19.02B(2)(b)(ii)]**

B6. Whenever gases bearing VOC are exhausted to the regenerative thermal oxidizer the minimum combustion zone temperature shall be 1515 °F unless the most recent performance tests approved by the Department show that a higher temperature is necessary, or that a lower temperature is sufficient, to achieve an overall VOC reduction efficiency sufficient for compliance with COMAR 26.11.19.05, COMAR 26.11.19.02B(2)(b)(ii), and 40 CFR 60, Subpart TT. **[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/15/2022 and 40 CFR 60, Subpart TT]**

D. Control of Hazardous Air Pollutants (HAPs) – See Table 3B

3A.2	**Testing Requirements:** A. Visible Emissions Limitations: See Monitoring Requirements. B. Control of VOC: (1) No later than 180 days after initial startup of when the two (2) aluminum foil web coating lines are exhausted to the regenerative thermal oxidizer, the Permittee shall conduct performance tests to demonstrate compliance with the requirements of COMAR 26.11.19.05, 40 CFR 60, Subpart TT, and 40 CFR 63, Subpart JJJJ. The performance tests shall be conducted in accordance with the requirements specified in 40 CFR §60.8, §60.466, §63.7, and §63.3360, as applicable. (2) At least 30 days prior to the performance tests, the Permittee shall submit to the Department for approval a test protocol that summarizes the test methods that will be employed and the operating parameters that will be monitored during the testing periods. The protocol shall be in accordance with applicable requirements under Section 1.4 of Table IV-1. (3) Within 60 days following completion of the performance tests, the Permittee shall provide to the Department a written report summarizing the data and results of the tests. The report shall include such records as necessary to characterize the operating conditions of each aluminum foil web coating line and the RTO during periods of testing. At a minimum, the report shall include the following information: (a) The coating line speed in feet per minute. (b) The total surface area of material coated in square feet. (c) The total amount of coating applied in gallons. (d) The amount of VOC and organic HAP processed in pounds per hour.

	(e) The destruction or removal efficiency of the RTO. (f) The combustion zone temperatures in the combustion chamber of the RTO. (g) Certification that the construction and operation of the modified PTE are consistent with the requirements for PTEs included under Section 6 of EPA Reference Method 204 of 40 CFR 51, Appendix M. **[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/15/2022]** C. Control of Hazardous Air Pollutants (HAPs) – See Table 3B
3A.3	**Monitoring Requirements:** A. Visible Emissions Limitations The Permittee shall conduct at least once per calendar month observations for visible emissions from the regenerative thermal oxidizer exhaust stack. The observations shall be conducted in accordance with Section 1.1 of Table IV-1. **[Authority: COMAR 26.11.03.06C]** B. Control of VOC B1, B2, B4, B5 & B6. The Permittee shall continuously monitor and record the combustion zone temperature of the regenerative thermal oxidizer whenever the aluminum foil web coating line is in operation. **[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/15/2022, and COMAR 26.11.01.02H, and 40 CFR §60.464(c)]** B3. See Recordkeeping and Reporting Requirements. C. Control of Hazardous Air Pollutants (HAPs) – See Table 3B

3A.4	**Record Keeping Requirements:** A. Visible Emissions Limitations The Permittee shall maintain, in accordance with applicable requirements under Section 1.1 of Table IV-1, records of all required observations for visible emissions. **[Authority: COMAR 26.11.03.06C]** B. Control of VOC B1, B2, B4, B5, & B6. For each coating used the Permittee shall maintain a valid demonstration that the regenerative thermal oxidizer reduces VOC emissions to levels that are no greater than would be such levels if the coating, as applied, contained 2.6 lbs VOC/gallon of coating minus water. **[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/15/2022, and COMAR 26.11.03.06C]** B3. The Permittee shall maintain all records in accordance with applicable requirements under Section 1.5 of Table IV-1. **[Authority: COMAR 26.11.03.06C]** B1, B2, B4, B5 & B6. Operating Temperatures: (1) The Permittee shall maintain records of all required determinations of the 3-hour block averages of the combustion zone temperature in the regenerative thermal oxidizer. **[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/15/2022, and COMAR 26.11.02.02H, and 40 CFR §60.464(c)]** (2) The Permittee shall maintain records of all periods in excess of three (3) hours during which the average combustion zone temperature in the RTO dropped below the minimum temperature limit determined during the most recent performance test, in accordance with §63.3360(e)(3)(i). **[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/15/2022 and 40 CFR 60, Subpart TT]** C. Control of Hazardous Air Pollutants (HAPs) – See Table 3B

3A.5	**Reporting Requirements:** A. The Permittee shall report occurrences of visible emissions in accordance with conditions number 4 ("Report of Excess Emissions and Deviations"), and number 9 ("Compliance Certification Report"), of Section III – Plant Wide Conditions. B1, B2, B4, B5 & B6. The Permittee shall submit by the 30th day of the end of each calendar half, semi-annual reports as required by condition number 4 ("Report of Excess Emissions and Deviations") of Section III – Plant Wide Conditions that include accounts of: (1) All periods in excess of three (3) hours during which the average combustion zone temperature in the regenerative thermal oxidizer remained below 1515 °F, or the temperature at which compliance with applicable requirements was demonstrated during the most recent measurement of the regenerative thermal oxidizer efficiency determined in accordance with 40 CFR 60, Subpart A, §60.8. (2) If no temperature excursions of the types described occurred during the reporting period, the Permittee shall submit a semi-annual report that states there were no excursions as described. **[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/15/2022 and 40 CFR 60, Subpart TT]** B3. The Permittee shall submit records of the most recent VOC capture efficiency tests upon request by the Department. **[Authority: COMAR 26.11.03.06C]** C. Control of Hazardous Air Pollutants (HAPs) – See Table 3B

Table IV – 3B (Aluminum Foil Web Coating Lines – Control of HAPs)	
3B.0	**Emissions Unit Number:** EU – 10: One (1) Aluminum Foil Web Coating Line Controlled by the Regenerative Thermal Oxidizer associated with EU-12 (ARA Registration No. 6-0367) EU – 12: One (1) Aluminum Foil Web Coating Line Controlled by a Regenerative Thermal Oxidizer (ARA Registration No. 025-0423-6-0493)
3B.1	**Applicable Standards/Limits:** Control of Hazardous Air Pollutants (HAPs) **40 CFR 63, Subparts A (General Provisions) and JJJJ (NESHAP for Paper and Other Web Coating (POWC))**, which requires either a consistent overall HAP reduction of at least 98% or implementation of an allowable alternative compliance method, and imposes testing, monitoring, record keeping and reporting requirements. A. In accordance with Table 2 to Subpart JJJJ, the following requirements of the General Provisions included under Subpart A (as promulgated December 4, 2002) apply to POWC operations: General Provisions Reference — Comments and Explanations §63.1(a)(1) through (4) §63.1(a)(6) through (8) §63.1(a)(10) through (14) §63.1(b)(2) and (3) §63.1(c)(1) §63.1(c)(4) §63.1(c)(5) §63.1(e) §63.2 ..... Additional definitions in Subpart JJJJ §63.3(a) through (c) §63.4(a)(1) through (3) §63.4(a)(5) §63.4(b) and (c) §63.5(a)(1) and (2)

	§63.5(b)(1)	
	§63.5(b)(3) through (6)	
	§63.5(d)	
	§63.5(e)	
	§63.5(f)	
	§63.6(a)	Applies only when capture and control system is used to comply with the standard.
	§63.6(b)(7)	
	§63.6(c)(1) and (2)	
	§63.6(c)(5)	
	§63.6(e)	Provisions pertaining to SSMP, and CMS do not apply unless an add-on control system is used to comply with the emission limitations.
	§63.6(f)	
	§63.6(g)	
	§63.6(i)(1) through (14)	
	§63.6(i)(16)	
	§63.6(j)	
	§63.7	
	§63.8(a)(1) and (2)	
	§63.8(b)	
	§63.8(c)(1) through (3)	§63.8(c)(1)(i) & (ii) only apply if you use capture and control systems and are required to have a start-up, shutdown, and malfunction plan.
	§63.8(c)(4)	
	§63.8(c)(6) through (8)	Provisions for COMS are not applicable.
	§63.8(d) through (f)	§63.8(f)(6) only applies if you use CEMS.
	§63.8(g)	Only applies if you use CEMS
	§63.9(a)	
	§63.9(b)(1)	
	§63.9(b)(2)	Except §63.3400(b)(1) requires submittal of initial notification for existing affected sources no later than 1 year before compliance date.
	§63.9(b)(3) through (5)	
	§63.9(c) through (e)	
	§63.9(g)	Provisions for COMS are not applicable.

§63.9(h)(1) through (3)		
§63.9(h)(5) and (6)		
§63.9(i)		
§63.9(j)		
§63.10(a)		
§63.10(b)(1) through (3)	§63.10(b)(2)(i) through (v) only apply if you use a capture and control system.	
§63.10(c)(1)		
§63.10(c)(5) through (8)		
§63.10(c)(10) through (15)		
§63.10(d)(1) and (2)		
§63.10(d)(4) and (5)		
§63.10(e)(1) and (2)	Provisions for COMS are not applicable.	
§63.10(f)		
§63.12		
§63.13		
§63.14	Subpart JJJJ includes provisions for alternative ASME test methods that are incorporated by reference.	
§63.15		

B. Operational Requirement: Unless the Permittee provides to the Department written notice (accompanied by a valid compliance demonstration) that the Permittee can and will comply with 40 CFR 63, Subpart JJJJ by an allowable alternative compliance method, the Permittee shall use a permanent total enclosure (PTE), a regenerative thermal oxidizer, and operating limits established during the most recent approved performance test to limit organic HAP emissions to not more than 2 percent of the organic HAP applied (98 percent reduction) for each month during each 12-month compliance period. **[Authority: 40 CFR 63, Subpart JJJJ, §63.3320(b)(1) and §63.3370; and Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/15/2022]**

C. Operational Requirements: Whenever the aluminum foil web coating lines are in operation, the Permittee shall demonstrate compliance with the required HAP emissions reduction by maintaining the average combustion zone temperature in the

	regenerative thermal oxidizer at the minimum operating temperature established during the most recent approved performance test. **[Authority: 40 CFR 63, Subpart JJJJ, § 63.3360(e)(3)(i)(A) and (B)]** D. Operational Requirement: The Permittee shall utilize a permanent total enclosure (PTE) that meets all criteria included under Section 6 of EPA Reference Method 204 of 40 CFR 51, Appendix M to capture one hundred percent (100%) of all organic HAP evaporated during the web coating, flash-off and curing processes, and all exhaust gases from the PTE shall be vented through a properly functioning regenerative thermal oxidizer before discharge to atmosphere. **[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/15/2022]** E. Operational Requirement: The Permittee shall develop and implement a startup, shutdown, and malfunction plan (SSMP) in accordance with applicable requirements and specifications promulgated under 40 CFR 63, Subpart A, §63.6(e)(3). **[Authority: Table 2 to 40 CFR 63, Subpart JJJJ]**
3B.2	**Testing Requirements:** Control of HAP: (1) No later than 180 days after initial startup of when the two (2) aluminum foil web coating lines are exhausted to the regenerative thermal oxidizer, the Permittee shall conduct performance tests to demonstrate compliance with the requirements of COMAR 26.11.19.05, 40 CFR 60, Subpart TT, and 40 CFR 63, Subpart JJJJ. The performance tests shall be conducted in accordance with the requirements specified in 40 CFR §60.8, §60.466, §63.7, and §63.3360, as applicable. (2) At least 30 days prior to the performance tests, the Permittee shall submit to the Department for approval a test protocol that summarizes the test methods that will be employed and the operating parameters that will be monitored during the testing periods. The protocol shall be in accordance with applicable requirements under Section 1.4 of Table IV-1. (3) Within 60 days following completion of the performance tests, the Permittee shall provide to the Department a written report

	summarizing the data and results of the tests. The report shall include such records as necessary to characterize the operating conditions of each aluminum foil web coating line and the RTO during periods of testing. At a minimum, the report shall include the following information: (a) The coating line speed in feet per minute. (b) The total surface area of material coated in square feet. (c) The total amount of coating applied in gallons. (d) The amount of VOC and organic HAP processed in pounds per hour. (e) The destruction or removal efficiency of the RTO. (f) The combustion zone temperatures in the combustion chamber of the RTO. (g) Certification that the construction and operation of the modified PTE are consistent with the requirements for PTEs included under Section 6 of EPA Reference Method 204 of 40 CFR 51, Appendix M. **[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/15/2022]**
3B.3	**Monitoring Requirements:** Control of Hazardous Air Pollutants (HAPs) A, B, C, & D. (1) With regard to continuous parameter monitoring systems (CPMS): (a) Each CPMS shall complete a minimum of one cycle of operation for each successive 15-minute period. A minimum of four equally spaced successive cycles of CPMS operation are required to have a valid hour of data.

(b) The CPMS shall provide valid data from at least 90 percent of the hours during which the process operated.

(c) The Permittee shall determine the arithmetic average of all valid recorded readings for each 3-hour block period of operation.

(d) Compliance with a standard or limit included in this Part 70 permit for an operating parameter that the Permittee is required to continuously monitor shall be determined by comparison of the standard or limit with a "valid arithmetic average" determined for the parameter during 3-hour block averaging periods. A "valid arithmetic average" of an operating parameter for a 3-hour block period shall be computed using:

(i) at least nine (9) valid determinations of the operating parameter, each determination made in a separate 15-minute block period during the 3-hour block averaging period; and
(ii) all valid determinations of the operating parameter made during the 3-hour block averaging period.

(e) The Permittee shall record the results of each inspection, calibration, and validation check of the CPMS.

(f) At all times, the Permittee shall maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(g) Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), the Permittee shall conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in § 63.3370. The Permittee shall use all the valid data collected during all other periods in assessing compliance of the control device and associated control

system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(h) Any averaging period for which valid monitoring data are not available and such data are required constitutes a deviation, and the Permittee shall notify the Department and EPA in accordance with § 63.3400(c).

(i) For any temperature monitoring equipment required by this permit the following shall apply:

(i) The Permittee shall install, calibrate, maintain, and operate the temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every 3 months or the chart recorder, data logger, or temperature indicator shall be replaced. The Permittee shall replace the equipment whether the Permittee chooses not to perform the calibration or the equipment cannot be calibrated properly.

(ii) Each temperature monitoring device required by this Part 70 permit shall be equipped with a continuous recorder, and the system shall be capable of monitoring and recording temperatures with an accuracy of ±1 percent of the temperature being monitored in degrees Celsius or ±1 degree Celsius, whichever is greater.

(j) For the Regenerative Thermal Oxidizer, the Permittee shall install a thermocouple or other temperature sensor in the combustion chamber at a location in the combustion zone and shall continuously monitor and record the temperature at that point whenever the web coating line is in operation.

[Authority: 40 CFR 63, Subpart JJJJ, §63.3350(e) and COMAR 26.11.03.06C]

(2) With regard to capture system monitoring: In accordance with §63.3350(f) the Permittee shall develop and implement a site-specific monitoring plan in accordance with the following:

(a) The monitoring plan shall:

(i) Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and

(ii) Explain why this parameter is appropriate for demonstrating ongoing compliance; and

(iii) Identify the specific monitoring procedures.

(b) The monitoring plan shall specify the operating parameter value or range of values that demonstrate compliance with the emission standards in § 63.3320. The specified operating parameter value or range of values shall represent the conditions present when the capture system is being properly operated and maintained.

(c) The Permittee shall conduct all capture system monitoring in accordance with the plan.

(d) Any deviation from the operating parameter value or range of values which are monitored according to the plan shall be considered a deviation from the operating limit.

(e) The Permittee shall review and update the capture system monitoring plan at least annually.

[Authority: 40 CFR 63, Subpart JJJJ, §63.3350(f)]

D. The Permittee shall develop and implement a startup, shutdown, and maintenance plan. **[Authority: 40 CFR 63, Subparts A, §63.6(e)(3)]**

3B.4	**Record Keeping Requirements:** Control of Hazardous Air Pollutants (HAPs) A, B, C, & D. In accordance with 40 CFR 63, Subpart JJJJ, §63.3410 the Permittee shall maintain records of the following: (1) Records specified in § 63.10(b)(2) (General Provisions) of all measurements needed to demonstrate compliance with this standard, including: (a) Control device and capture system operating parameter data in accordance with the requirements of § 63.3350(e) and (f); and (b) Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of § 63.3360(e) and (f); (2) Records specified in § 63.10(c) (General Provisions) for each continuous monitoring system operated by the owner or operator in accordance with the requirements of § 63.3350(b). **[Authority: CFR 63, Subpart JJJJ, §63.3410]** E. The Permittee shall maintain a written or printable electronic copy of the required startup, shutdown, and maintenance plan. **[Authority: 40 CFR 63, Subparts A, §63.6(e)(3)]**
3B.5	**Notifications and Reporting Requirements:** Control of Hazardous Air Pollutants (HAPs) A, B, C, & D. In accordance with 40 CFR 63, Subpart JJJJ, §63.3400 the Permittee shall submit to the Department and to EPA Region III the following notifications and reports: (1) Semiannual compliance reports in accordance with the following: (a) Compliance report dates.

(i) Each compliance report shall cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(ii) Each subsequent compliance report shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(iii) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to § 70.6(a)(3)(iii)(A) or § 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates established in paragraphs (a)(i) through (iv) of this condition.

(b) The compliance report shall contain all of the following information:

(i) Permittee name and address.

(ii) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period.

(iv) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to the Permittee, a statement that there were no deviations from the emission limitations during the reporting period, and

that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

(v) For each deviation from an emission limitation (emission limit or operating limit) that applies to the Permittee's facility and that occurs at an affected source where the Permittee is not using a CEMS to comply with the emission limitations in this subpart, the compliance report shall contain all of the following information:

a. The total operating time of each affected source during the reporting period.

b. Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

c. Information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

(2) Notification of Performance Tests as specified in § 63.7 (General Provisions) and 63.9(e) (General Provisions). This notification and the site-specific test plan required under § 63.7(c)(2) shall identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the performance test are maintained. Unless the Department or EPA objects to the parameter or requests changes, the Permittee may consider the parameter approved.

(3) Notification of Compliance Status as specified in § 63.9(h) (General Provisions).

	(4) Performance test reports submitted as specified in § 63.10(d)(2) (General Provisions). The performance test reports shall be submitted as part of the notification of compliance status required in § 63.3400(e). (5) Startup, shutdown, and malfunction reports as specified in § 63.10(d)(5) (General Provisions). If actions taken by the Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by § 63.6(e)(3) (General Provisions), the Permittee shall state such information in the report. The startup, shutdown, or malfunction report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy. **[Authority: 40 CFR 63, Subpart JJJJ, §63.3400]**

Table IV – 4 (Boiler)	
4.0	**Emissions Unit Number:** EU – 11: One (1) boiler, 4.2 MMBtu/hr, fired with natural gas only (ARA Registration No. 025-0423-5-0286)
4.1	**Applicable Standards/Limits:** A. Visible Emissions Limitations: **COMAR 26.11.09.05A(2)**, which requires that a person not cause or permit the discharge of emissions from any fuel burning equipment, other than water in uncombined form, which is visible to human observers. Exceptions. **COMAR 26.11.09.05A(3)** establishes that Section A(2) does not apply "to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period." B. Operational Limitation: The Permittee shall burn only natural gas in the boiler unless the Permittee obtains from the Department written

	authorization to burn alternative fuels. **[Authority: COMAR 26.11.02.09A]**
4.2	**Testing Requirements:** A. Visible Emissions Limitations: See Recordkeeping and Reporting Requirements. B. Operational Limitation: See Recordkeeping and Reporting Requirements.
4.3	**Monitoring Requirements:** A. Visible Emissions Limitations: See Recordkeeping and Reporting Requirements. B. Operational Limitation: See Recordkeeping and Reporting Requirements.
4.4	**Record Keeping Requirements:** A. Visible Emissions Limitations & B. Operational Limitation The Permittee shall maintain all records in accordance with applicable requirements under Section 1.5 of Table IV-1. **[Authority: COMAR 26.11.03.06C]**
4.5	**Reporting Requirements:** A. Visible Emissions Limitations The Permittee shall report occurrences of visible emissions from the boiler in accordance with conditions number 4 ("Report of Excess Emissions and Deviations"), and number 9 ("Compliance Certification Report") of Section III – Plant Wide Conditions. B. Operational Limitation The Permittee shall report records of fuel used upon request by the Department. **[Authority: 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 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;

The units are subject to the following requirements:

COMAR 26.11.09.05A(2), which establishes that the Permittee may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers.

Exceptions: COMAR 26.11.09.05A(2) does not apply to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if:

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

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

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

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

No. 2 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;

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

No. 1 Phosphoric Acid Anodizing (PAA) Line (ARA Registration No. 025-0423-6-0297)

No. 1 Duracore Coating Line

SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

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

1. Applicable Regulations:

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

   (B) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.

   (C) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health

2. Record Keeping and Reporting:

   (A) To demonstrate compliance with COMAR 26.11.15.06, the Permittee shall maintain, and shall make available to the Department upon request, written or printable records of the following information:

      (i) For the PAA Line: monthly records of the materials used, including all acid and caustic solutions and cleaners. **[Authority: Permit-to-Construct No. 12-6-0297N issued 07/15/1998]**

      (ii) For the Aluminum Foil Web Coating Lines (EU-10 and EU-12): monthly records of the amount of coating applied (avg. lbs/hr), and hours of operation per month. **[Authority: Permit-to-Construct No. 025-0423-6-0367 issued 03/28/2013]**

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

      (i) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or

      (ii) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts

for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.

BACKGROUND

The Gill Corporation - Maryland (Gill) manufactures honeycomb core and corrugated core products for use in aircraft construction and related industries at their facility located on 1502 Quarry Drive in Edgewood, MD, within the limits of Harford County. Gill is in Maryland Air Quality Region III. The primary SIC code for the facility is 3354.

The primary sources of air emissions at the facility include two honeycomb core manufacturing lines (EU-5 and EU-6) and two corrugated core manufacturing lines (EU-7 and EU-TBD). Supporting operations include two metal coil (aluminum foil) coating lines (EU-10 and EU-12 controlled by a regenerative thermal oxidizer), a small natural gas-fired boiler for process heat (EU-11), a phosphoric acid anodizing (PAA) line, and a Duracore coating line to clean and treat the aluminum foil prior to manufacturing.

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

Table 1: Actual Emissions

Year	NO_x (TPY)	SO_x (TPY)	PM_{10} (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2020	1.6	0.01	0.03	1.3	9.4	17.1
2019	1.9	0.01	0.04	1.6	16.4	44.3
2018	1.9	0.01	0.04	1.6	18.6	55.1
2017	1.7	0.01	0.03	1.4	17.4	43.4
2016	1.6	0.01	0.03	1.3	15.1	36.9
2015	1.8	0.01	0.03	1.5	15.0	34.6

The major source threshold for triggering Title V permitting requirements in Harford County is 25 tons per year for VOC, 25 tons for NOx, and 100 tons per year for any other criteria pollutants and 10 tons for a single HAP or 25 tons per year for total HAPS . Since the actual HAP emissions from the facility are greater than the major source threshold, Gill is required to obtain a Title V – Part 70 Operating Permit under COMAR 26.11.03.01.

A Title V Part 70 permit renewal application was received by the Department on November 25, 2019 for the facility located at 1502 Quarry Drive, Edgewood, Maryland. An administrative completeness review was conducted with a letter mailed on December 5, 2019.

CHANGES AND MODIFICATIONS TO THE PART 70 OPERATING PERMIT

On June 12, 2018, Gill submitted an administrative amendment for a name change from Alcore, Inc. to The Gill Corporation - Maryland

On June 18, 2021, Permit to Construct 025-0423-6-0543 was issued authorizing Gill to install one (1) aluminum corrugation line.

On February 15, 2022, Permit to Construct 025-0423-6-0367 & -6-0493 was issued authorizing the modification of exhaust lines and Tann regenerative oxidizer associated with two (2) aluminum foil web coating lines. This permit allowed Gill to remove the catalytic oxidizer associated with EU-10 and route the exhaust gases from EU-10 to the thermal oxidizer associated with EU-12.

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

Compliance Assurance Monitoring (CAM) applies to any emission unit at a Title V major source that meets all of the following criteria:

(1) The emission unit is subject to a federally enforceable emission limit or standard for a regulated pollutant;

(2) The emission unit uses a control device to achieve compliance with any such emission limitation or standard; and

(3) The emission unit has the potential to emit pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source and must not otherwise be exempt from CAM.

Gill uses control devices as defined in 40 CFR §64.1 to reduce emissions of VOC and HAP from Emissions Units (EU) EU-10 and EU-12. These emissions units are subject to VOC and HAP emissions limitations or standards proposed by the EPA after November 15, 1990 under the Federal Clean Air Act Chapter 111 (Standards of Performance for New Stationary Sources) and § 112 (Hazardous Air Pollutants). All of the VOC emissions are organic HAPs at this facility. Since Gill's VOC emissions units are subject to post-1990 MACT requirements, they are exempt from the CAM requirements.

GREENHOUSE GAS (GHG) EMISSIONS

Gill emits the following greenhouse gases (GHGs) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHGs originate from combustion sources contained within the facility premises applicable to Gill. The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements. Emission certifications reports for the years 2017, 2018, and 2019, show that Gill is not a major source (threshold: 100,000tpy CO_2e) for GHG's (see Table 2 shown below). The Permittee shall quantify facility wide GHGs emissions and report them in accordance with Section 3 of the Part 70 permit.

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

Table 2: Greenhouse Gases Emissions Summary

GHG	Conversion factor	2017 tpy CO_2e	2018 tpy CO_2e	2019 tpy CO_2e	2020 tpy CO_2e
Carbon dioxide CO_2	1	2028	2307	2228	1887
Methane CH_4	25	1	1.25	1	1
Nitrous Oxide N_2O	300	12	12	12	9
Total GHG CO_{2eq}		**2041**	**2320**	**2241**	**1897**

EMISSION UNIT IDENTIFICATION

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

Table 3: Emission Unit Identification

Emissions Unit Number	MDE Registration Number	Emissions Unit Name and Description	Date of Installation
EU – 5	025-0243-6-0299	Honeycomb Core Print Line No. 1	1999
EU – 6	025-0243-6-0300	Honeycomb Core Print Line No. 2	1999
EU – 7	025-0243-6-0301	Corrugated Core Manufacturing Line (with curing oven)	2000

EU – 10	025-0243-6-0367	Aluminum Foil Web Coating Line controlled by the regenerative thermal oxidizer associated with EU-12	2002 Modified 2022
EU – 11	025-0243-5-0286	One natural gas fired boiler rated at 4.2 MMBTU per hour	2007
EU – 12	025-0243-6-0493	Aluminum Foil Web Coating Line controlled by a regenerative thermal oxidizer	2014
EU-TBD	025-0243-6-0543	Corrugated Core Manufacturing Line	2021

FEDERAL REGULATORY APPLICABILITY

NSPS Applicability – The facility's aluminum foil web coating lines (EU-10 and EU-12) are subject to 40 CFR 60, Subparts A (General Provisions for NSPS Sources) Subpart TT, which establish NSPS for Metal Coil Surface Coating.

NESHAP Part 63 (MACT) applicability – The facility's aluminum foil web coating lines (EU-10 and EU-12) are subject to 40 CFR 63, Subparts A (General Provisions for Part 63 Sources) and JJJJ, which establish MACT standards for Paper and Other Web Coating (POWC) sources at major HAP facilities.

Although the existing facility, prior to the installation of the two (2) aluminum foil coating lines installed in 2002 and 2014, was a major HAP source it was not subject to any source specific MACT standard. It did not trigger case by case MACT when the facility was relocated from Jessup to Edgewood because the Department and EPA Region III determined that a relocation of an existing major HAP source with no new physical changes was not a new major HAP source subject to case by case MACT requirements.

NESHAP Part 61 applicability – The facility is currently not subject to any NESHAP established under 40 CFR 61.

NSR and PSD applicability – Gill has not been subject to NSR or PSD approval for this facility.

AN OVERVIEW OF THE PART 70 PERMIT

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

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

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

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

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

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

Table IV-1

This table provides general facility wide applicable provisions with regard to requirements for observations for visible emissions, implementation of good operating practices designed to minimize emissions of VOC, implementation of a VOC leak detection and repair program, stack testing, and record keeping and reporting.

Table IV – 1 (General Provisions)	
1.0	**General Facility Wide Provisions:** This table provides generally applicable provisions with regard to requirements for observations for visible emissions, implementation of good operating practices designed to minimize emissions of VOC, implementation of a VOC leak detection and repair program, stack testing, and record keeping and reporting. Provisions in this table may be superseded or modified by requirements in succeeding tables. INDEX: 1.1 Observations For Visible Emissions 1.2 Good Operating Practices Designed to Minimize Emissions of VOC 1.3 VOC Leak Detection and Repair 1.4 Stack Testing 1.5 Record Keeping and Reporting
1.1	**Observations For Visible Emissions:** Unless otherwise provided in the specific requirements for an affected emissions unit, whenever the Permittee is required to perform an observation for visible emissions the following shall apply: A. Each required observation shall be performed when the affected source of emissions is in operation. If the affected source of emissions does not operate within the period during which an observation would otherwise be required, the Permittee shall not be required to make an observation of the affected emissions point for that period.

Table IV – 1 (General Provisions)	
	B. If the Permittee is required to observe an emissions point that is common to more than one source of emissions, the Permittee shall make the required observation when at least one of the sources of emissions is in operation. If none of the affected sources of emissions operate within the period during which an observation would otherwise be required, the Permittee shall not be required to make an observation of the emissions point for that period. C. Observations shall be performed during daylight hours unless the Permittee obtains from the Department written approval to conduct observations of properly lighted emissions points during non-daylight hours. D. Each required observation for visible emissions shall endure for at least one (1) minute. E. The Permittee shall make a written or printable electronic record of each required observation for visible emissions, and each such record shall include identification of the observer, the date of the observation, the time at the start of the observation, the time at the end of the observation if the observation endures for more than 1 minute, and an account of the observer's findings during performance of the observation. F. If visible emissions are found during an observation, the Permittee shall either initiate immediate shutdown of all installations contributing to the visible emissions or shall: (1) inspect all process and/or control equipment with potential to contribute to the visible emissions. For combustion sources (e.g., fuel burning equipment), inspect all combustion control systems and all combustion operations with potential to contribute to the visible emissions; (2) where practical, perform within 24 hours all repairs and/or adjustments to all process equipment, control equipment, combustion control systems and/or combustion sources necessary to eliminate visible emissions; and

Table IV – 1 (General Provisions)	
	(3) make written records of any repairs and/or adjustments to process equipment, control equipment, combustion control systems and/or combustion sources that were necessary to eliminate visible emissions. G. If visible emissions have not been eliminated within 48 hours, the Permittee shall either: (1) conduct at least once per day EPA Reference Method 9 visible emissions evaluations for a period of at least 12 minutes per evaluation until visible emissions have been eliminated; or (2) shut down all equipment contributing to the visible emissions, and effect all maintenance and repairs necessary to re-establish operation without visible emissions before re-starting. **[Authority: COMAR 26.11.03.06C]**
1.2	**Good Operating Practices Designed to Minimize Emissions of VOC to Atmosphere:** Unless a portion of the facility is specifically exempted, the Permittee shall implement facility-wide "good operating practices" in accordance with COMAR 26.11.19.02I, and the following shall apply: A. "Good operating practices" shall include, at a minimum: (1) Provisions for training operators with regard to practices, procedures, and maintenance requirements that are consistent with equipment manufacturers' recommendations, and with requirements dictated by the Permittee's experiences with operation of equipment. The training shall include material concerning proper maintenance procedures for air pollution control equipment; (2) Maintenance of covers on containers and other vessels that are not in use and that contain VOC or VOC-bearing materials;

Table IV – 1 (General Provisions)	
	(3) Scheduling operations as much as practical to minimize color changes and material changes when applying VOC-bearing materials by spray application; (4) Where practical, using high-volume-low-pressure (HVLP) spray-applicators or other high efficiency application methods for spray application of VOC-bearing materials; and (5) Mixing and blending VOC-bearing materials, as much as practical, in closed containers, and implementing preventive measures designed to minimize emissions from products that contain VOC. (6) Minimize spills of VOC-containing cleaning materials; (7) Convey VOC-containing cleaning materials from one location to another in closed containers or pipelines; and (8) Minimize VOC emissions from cleaning of storage, mixing, and conveying equipment. B. "Good operating practices" shall be established in writing, shall be made available to the Department upon request, and shall be either included as part of an operator training program or posted where clearly visible to operators. C. The Permittee shall take all reasonable precautions to prevent or minimize the discharge of VOC to atmosphere when cleaning process equipment and coating application equipment, including containers, vessels, tanks, lines, spray application devices, and pumps. Reasonable precautions for equipment cleanup shall include, at a minimum: (1) Storing all waste materials, including VOC-contaminated cloth and paper, in closed containers; (2) For frequently cleaned equipment, preparing written standard operating procedures that include, where practical, provisions for using non-VOC or low-VOC cleaning agents, and procedures designed to minimize the quantities of VOC-bearing cleaning materials used;

Table IV – 1 (General Provisions)	
	(3) Where practical, using enclosed spray-applicator cleaning methods, VOC-recycling systems, and other spray-applicator cleaning methods designed to reduce or eliminate VOC emissions; and (4) Where practical, using detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines, containers, and process equipment. D. With regard to storage and transfer of VOC, the Permittee shall at a minimum: (1) Install conservation vents, or other vapor control measures designed to minimize standing losses, on each storage tank with a capacity of 2000 gallons or more in VOC service; and (2) For stationary storage tanks with capacities greater than 10,000 gallons and less than 40,000 gallons that store VOC or VOC-bearing materials (excluding gasoline) with vapor pressures greater than 1.5 psia, use vapor balance, vapor control lines or other vapor control measures, whenever VOC are transferred from tank trucks into such tanks. **[Authority: COMAR 26.11.19.02I]** E. The Permittee shall maintain written descriptions of all "good operating practices" designed to minimize emissions of VOC from facility-wide operations. **[Authority: COMAR 26.11.19.02I]**
1.3	**VOC Leak Detection and Repair:** Unless a portion of the facility is specifically exempted, the Permittee shall implement a facility-wide VOC leak detection and repair program in accordance with COMAR 26.11.19.16, and the following shall apply: A. The Permittee shall visually inspect for leaks, at least once per calendar month, all equipment and components in VOC service. If leaks are detected, the Permittee shall: (1) tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be

Table IV – 1 (General Provisions)	
	normally exposed. The tag shall bear an identification number, the date that the leak was discovered, and the identity of the person who discovered the leak. The tag shall remain in place until the leak has been repaired; (2) initiate immediate action to repair all observed VOC leaks that can be repaired within 48 hours; (3) repair all other leaking components within fifteen (15) days of discovery. If a replacement part is needed, the part shall be ordered within three (3) days of discovery of the leak, and the leak shall be repaired with 48 hours of receipt of the part; and (4) maintain a supply of components and component parts, such as seals, gaskets, packing and pipe fittings, that are known to wear or corrode, or that otherwise need to be routinely replaced. B. Components that cannot be repaired as required because they are inaccessible, or that cannot be repaired during operation of an installation, shall be identified in a log and included within the facility's maintenance schedule for repair during the next outage of the installation. C. The Permittee shall conduct VOC leak detection inspections at least once per calendar month in accordance with COMAR 26.11.19.16. D. The Permittee shall maintain VOC leak detection and repair logs that include identification of the persons who conducted the leak detection inspections, the dates on which the inspections were conducted, the findings during the inspections, a listing by tag identification number and a description of all leaks discovered, and the date and nature of all leak repairs effected. **[Authority: COMAR 26.11.19.16]**
1.4	**Stack Testing:** A. Unless otherwise provided in the specific requirements for an emissions unit, when the Permittee is required to perform stack testing the Permittee shall submit to the Department for approval a stack test protocol that includes:

Table IV – 1 (General Provisions)	
	(1) the purpose of the stack testing; (2) a testing schedule that provides the projected dates and times of testing; (3) an account of all test methods and procedures to be employed during the testing program; (4) for the emissions source or sources to be tested, an account of the operating conditions that will be extant during the testing program; and (5) a description of operating data that will be collected during the testing periods. B. The required stack test protocol shall be submitted at least 30 days prior to performance of any testing, and testing shall not be conducted before the Department provides approval of the protocol. C. Results of all required stack tests shall be submitted to the Department in writing within 60 days of completion of the testing. **[Authority: COMAR 26.11.03.06C]**

1.5	**Record Keeping and Reporting Requirements:** A. 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, any record that the Permittee is required by this permit to establish. B. The Permittee shall maintain all records required by this permit in a format that is acceptable to the Department. A format adopted by the Permittee shall be considered acceptable until the Department provides the Permittee with written notice otherwise. C. Unless otherwise specified in this permit the Permittee shall maintain all required records either in writing or in a printable electronic form. **[Authority: COMAR 26.11.03.06C]**

Table IV-2

Emissions Units:

EU – 5: One (1) Honeycomb Core Manufacturing Line – Print Line No. 1 (ARA Registration Number 025-0423-6-0299)

EU – 6: One (1) Honeycomb Core Manufacturing Line – Print Line No. 2 (ARA Registration Number 025-0423-6-0300)

EU – 7: One (1) Corrugated Core Manufacturing Line with Curing Oven (ARA Registration Number 025-0423-6-0301)

EU – TBD: One (1) Corrugated Core Manufacturing Line (ARA Registration Number 025-0423-6-0543)

The Honeycomb Core Print Lines (EU-5 and EU-6) are used to manufacture core blocks that require expansion to form the honeycombed cellular structure. Only one adhesive formulation is used for all products manufactured on the Honeycomb Core Print lines (EU-5 and EU-6).

The Corrugated Core Lines (EU-7 and EU-TBD) uses heavier gauge materials that do not expand properly after curing. Hence, the foil is corrugated to pre-form the honeycombed cellular structure before the adhesive is applied and cured in a small oven. Depending on which product is being manufactured on the corrugated core line, Gill will use one of two adhesive formulations. One is a "hot melt" formulation that contains no VOC; the other contains VOC. The current product mix is such that each adhesive is used about 50% of the operating time.

Applicable Standards and Limits

A. Visible Emissions Limitations

1. COMAR 26.11.06.02C(2), which requires that a person not cause or permit the discharge of emissions from any installation or building, other than water in uncombined form, which is visible to human observers.

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

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

(b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

2. Operational Requirement - Exhaust gases from the corrugated core curing oven shall vent through a filter before discharge to atmosphere whenever the oven is used to cure adhesives that have the potential to cause visible emissions during the curing process. **[Authority: Permit-to-Construct Nos. 12-6-0299N, 6-0300N, 6-0301N issued 09/23/1998]**

3. Operational Requirement – The Permittee shall only use the following materials as lubricants in the corrugation lines unless the Permittee obtains prior approval from the Department to use alternate lubricants.

   (a) Isopropyl Alcohol;

   (b) Methanol;

   (c) Acetone; and

   (d) Methyl Acetate

   [Authority: Registration Update on April 23, 2021 and Permit-to-Construct No. 6-0543 issued 02/15/2022]

4. Operational Requirement – The EU-TBD corrugation line shall be operated such that vapors from the applied lubricants are exhausted to a stack emission point on the roof of the building. **[Authority: Permit-to-Construct No. 6-0543 issued 02/15/2022]**

Compliance Demonstration for Visible Emissions Limitations

Daily observations for visible emissions from the corrugated core lines are not required unless an adhesive is used that has the potential to cause visible emissions. If an adhesive is used that has the potential to cause visible emissions, the observations shall me taken in accordance with Section 1.1 of Table IV-1 at least once per day. **[Authority: COMAR 26.11.03.06C]**

The Permittee is required to report occurrences of visible emissions in accordance with conditions number 4 ("Report of Excess Emissions and Deviations"), and

number 9 ("Compliance Certification Report"), of Section III – Plant Wide Conditions.

Rationale for Periodic Monitoring for Visible Emissions Limitations

The daily observations for visible emissions will be sufficient to determine if visible emissions are present. When a material is used with the potential to cause visible emissions, a properly maintained fabric filter is required. Use of a properly maintained fabric filter is sufficient in preventing visible emissions.

B. Control of Particulate Matter

COMAR 26.11.06.03B(2)(a), which limits the concentration of particulate matter in any process exhaust gases to not more than 0.03 grains per standard cubic foot of dry exhaust gas.

Compliance Demonstration and Rationale for Periodic Monitoring for Control of Particulate Matter

Emissions from the honeycomb and corrugated core lines are primarily VOC and organic HAPs (e.g., methylene chloride, methanol, isopropyl alcohol, and acetone) that evaporate when the adhesive applied during the fabrication process is cured. There is no potential for particulate emissions from the process during normal operation, and there is no need to impose periodic monitoring.

C. Control of VOC

COMAR 26.11.19.15C(1), which requires that the Permittee reduce emissions of VOC from adhesive application operations in honeycomb core and corrugated core manufacturing processes in accordance with the following:

(1) The Permittee shall not use an adhesive that contains more than 5.8 pounds of VOC per gallon (minus water) of adhesive applied in any honeycomb core or corrugated core installation that discharges more than 50 pounds of VOC per day. **[Authority: COMAR 26.11.19.15C(1)(a)]**

(2) The Permittee shall not cause or permit the discharge of VOC emissions from any honeycomb core printing or corrugated core manufacturing installation in excess of 200 pounds per day. **[Authority: COMAR 26.11.19.15C(1)(b)]**

Compliance Demonstration for Control of VOC

The Permittee is required to maintain the following records for the Honeycomb Core and Corrugated Core Manufacturing Lines:

(1) Material Safety Data Sheets (MSDS), or other valid product specification documents, that include the VOC content of each adhesive used, as applied;

(2) Daily consumption rates for each adhesive used; and

(3) Daily VOC emissions from each line, and the calculations by which those emissions were determined.

Rationale for Periodic Monitoring for Control of VOC

The required records provide direct statements of compliance with the regulatory requirements.

Table IV-3A

Emissions Units:
EU – 10: One (1) Aluminum Foil Web Coating Line Controlled by the Regenerative Thermal Oxidizer associated with EU-12 (ARA Registration No. 025-0423-6-0367)

EU – 12: One (1) Aluminum Foil Web Coating Line Controlled by a Regenerative Thermal Oxidizer (ARA Registration No. 025-0423-6-0493)

The aluminum foil web coating lines continuously apply an organic coating to both sides of pretreated aluminum foil. The coating is cured in an oven and wound into a coil for further processing. The coating equipment is enclosed in a Permanent Total Enclosure (PTE) and the emissions are vented to a regenerative thermal oxidizer (EU-12). The oxidizer reduces VOC emissions by at least 98% before exhausting the gases to the atmosphere.

Applicable Standards and Limits

A. Visible Emissions Limitations:

COMAR 26.11.06.02C(2), which requires that a person not cause or permit the discharge of emissions from any installation or building, other than water in uncombined form, which is visible to human observers.

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

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

(b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Compliance Demonstration for Visible Emissions Limitations

The Permittee is required to conduct observations for visible emissions from the regenerative thermal oxidizer exhaust stacks at least once per calendar month. The observations are to be conducted in accordance with Section 1.1 of Table IV-1. **[Authority: COMAR 26.11.03.06C]**

Rationale for Periodic Monitoring for Visible Emissions Limitations

The Permittee is required to operate and maintain the regenerative thermal oxidizer in accordance with provisions included under 40 CFR 60, Subpart TT (NSPS for Metal Coil Coaters) and 40 CFR 63, Subpart JJJJ (MACT for Paper and Other Web Coaters). With proper maintenance and operations, the potential for visible emissions from the units will be minimal. Monthly observations will be sufficient to determine if there is a problem with regard to visible emissions.

B. Control of VOC:

B1. COMAR 26.11.19.05, which limits the VOC content of any coating applied to the surface of a metal coil to no more than 2.6 lbs VOC/gal coating (minus water).

Alternative Compliance Method: COMAR 26.11.19.02B(2)(b)(ii) establishes that a person subject to a regulation in COMAR chapter 26.11.19 may comply with emissions standards in the chapter by using a control device that, when tested by approved test methods, results in an emissions reduction equal to or greater than the emissions reduction that would have been achieved by application of low VOC coatings or adhesives that meet applicable standards.

B2. 40 CFR 60, Subparts A (NSPS General Provisions) and TT (NSPS for Metal Coil Coaters), which requires an overall VOC emissions reduction

from metal coil coating operations of at least 90%, and imposes testing, monitoring, record keeping and reporting requirements.

B3. Operational Requirement: The Permittee shall maintain permanent total enclosures (PTEs) to provide 100% capture of volatile emissions from each aluminum foil web coating line and exhaust all emissions to the Tann RTO prior to discharging to the atmosphere.**[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/12/2022]**

B4. Operational Requirement: The Permittee shall utilize PTEs that meet all criteria included under Section 6 of EPA Reference Method 204 of 40 CFR 51, Appendix M to capture all VOC evaporated during web coating, flash -off and curing processes of the aluminum foil web coating lines and all exhaust gases from the PTEs shall be vented through a properly functioning RTO before discharge to atmosphere. At least once each calendar half, the Permittee shall use the procedures specified under Section 6 of EPA Reference Method 204 of 40 CFR 51, Appendix M to determine that the PTEs capture 100% of all VOC and organic HAP emissions from the aluminum foil web coating lines. **[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/12/2022]**

Compliance Demonstration

The permanent total enclosures (PTE) capture 100% of all VOC during processing. The PTE on EU-10 was modified in 2013 and has no openings that would allow for VOC emissions. The PTE on EU-12 has no openings and alarms for the door that alert operating staff.

Rationale for Periodic Monitoring

No periodic monitoring of the collection efficiency of the PTE is required.

B5. Operational Requirement: The Permittee shall operate the aluminum foil web coating lines such that the regenerative thermal oxidizer control system consistently reduces VOC emissions from each coating used, to levels that are no greater than would be such levels if the coating, as applied, contained 2.6 lbs VOC/gallon of coating minus water. **[Authority: COMAR 26.11.19.05; and COMAR 26.11.19.02B(2)(b)(ii)]**

Compliance Demonstration

Gill complies with COMAR 26.11.19.05 by utilizing an alternative method of compliance as established in COMAR 26.11.19.02B(2)(b)(ii).

The alternative method of compliance states that "a person subject to a regulation in COMAR chapter 26.11.19 may comply with emissions standards by using a

control device that, when tested by approved test methods, results in an emissions reduction equal to or greater than the emissions reduction that would have been achieved by application of low VOC coatings or adhesives that meet applicable standards". The coating subject to COMAR 26.11.19.05 requires a VOC emissions reduction of at least 95.84 percent to provide equivalence with the 2.6 lbs VOC/gal limit (emission standard) of COMAR 26.11.19.05 for coil coating.

The aluminum foil web coating lines are controlled by oxidizers that meet the destruction efficiency requirements of COMAR 26.11.19.02B(2)(b)(ii) and 40 CFR 60, Subpart TT (NSPS for Metal Coil Coaters). Gill maintains a copy of the most recent stack test reports to show that the oxidizer controls reduce VOC emissions to a level below the amount the use of complaint coatings would yield (equivalency determination previously submitted to the Department).

Rationale for Periodic Monitoring

The most recent stack testing of the regenerative thermal oxidizer was conducted on December 30, 2014 and the VOC destruction efficiency was determined to be 99.23%. Gill is required to operate and maintain the oxidizer controls in accordance with provisions included under 40 CFR 60, Subpart TT (NSPS for Metal Coil Coaters) and 40 CFR 63, Subpart JJJJ (MACT for Paper and Other Web Coaters); therefore the destruction efficiency requirements of COMAR 26.11.19.02B(2)(b)(ii) will be met.

An initial stack test is required by Permit to Construct No. 025-0423-6-0367 and 6-0493 issued February 15, 2022. This test will ensure that the RTO continues to meet standards during the operation of both aluminum foil web coating lines.

Gill is required to continuously monitor and record the temperatures of the combustion zone temperature of the regenerative thermal oxidizer whenever the aluminum foil web coating lines are in operation. A data logger is used to monitor and record temperature data. Production records track the hours of operation and amount of coating consumed on a monthly basis.

Continuous monitoring in accordance with 40 CFR 63, Subpart JJJJ, §63.3350(e) of the operating parameter established during the most recent performance test will provide assurance that the destruction efficiency of the control device is being met.

B6. Whenever gases bearing VOC are exhausted to the regenerative thermal oxidizer the minimum combustion zone temperature shall be 1515 °F unless the most recent performance tests approved by the Department show that a higher temperature is necessary, or that a lower temperature is sufficient, to achieve an overall VOC reduction efficiency

sufficient for compliance with COMAR 26.11.19.05, COMAR 26.11.19.02B(2)(b)(ii), and 40 CFR 60, Subpart TT. **[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/15/2022 and 40 CFR 60, Subpart TT]**

Compliance Demonstration

The regenerative thermal oxidizer was initially tested on December 30, 2014. At this time the unit operated at approximately 1515 °F. As a result of the performance test, the operating parameters were identified and included in Table 3A of the Part 70 operating permit.

40 CFR 63, Subpart JJJJ (MACT for Paper and Other Web Coating sources) imposes additional operating, monitoring and record keeping requirements to ensure that the oxidizer controls perform properly. See the requirements for HAP control below.

Rationale for Periodic Monitoring

A data logger is used to continuously monitor and record the combustion zone temperature of the regenerative thermal oxidizer in accordance with 40 CFR 63, Subpart JJJJ, §63.3350(e). No additional periodic monitoring is required.

C. Control of Hazardous Air Pollutants (HAPs) – See Table 3B

Table IV-3B

Emissions Units:
EU – 10: One (1) Aluminum Foil Web Coating Line Controlled by the Regenerative Thermal Oxidizer associated with EU-12 (ARA Registration No. 025-0423-6-0367)

EU – 12: One (1) Aluminum Foil Web Coating Line Controlled by a Regenerative Thermal Oxidizer (ARA Registration No. 025-0423-6-0493)

Applicable Standards and Limits

Control of Hazardous Air Pollutants

Applicability Considerations:

Gill's aluminum foil web coating lines are subject to National Emissions Standards For Hazardous Air Pollutants (NESHAP) promulgated under 40 CFR 63, which provides standards for Paper and Other Web Coating (POWC) processes (Subpart

JJJJ), and standards for Surface Coating of Metal Coil (Subpart SSSS). Metal Coil is defined in both subparts as a continuous metal strip that is at least 0.15 millimeter (0.006 inch) thick; therefore facilities that coat metal coils 0.15 mm or greater in thickness would be subject to Subpart SSSS, and facilities that coat metal coils less than 0.15 mm thick would be subject to Subpart JJJJ. Gill's web coating lines coat a mixture of foils, some of which are less than, and some of which are equal to or greater than 0.15 mm.

Gill's product mix is such that more than 85 percent of the aluminum foils coated is consistently less than 0.15 mm thick; therefore the web coating lines qualify as a POWC source. However Gill has the option to choose instead to be subject to the Metal Coil Coating rule. Gill submitted to the Department a notification on April 18, 2005 identifying the web coating line as a POWC source; hence the line is subject to 40 CFR 63, Subpart JJJJ, and is not subject to Subpart SSSS.

A. **40 CFR 63, Subparts A (General Provisions) and JJJJ (NESHAP for Paper and Other Web Coating (POWC))**, which requires either a consistent overall HAP reduction of at least 98% or implementation of an allowable alternative compliance method, and imposes testing, monitoring, record keeping and reporting requirements.

B. Operational Requirement: Unless the Permittee provides to the Department written notice (accompanied by a valid compliance demonstration) that the Permittee can and will comply with 40 CFR 63, Subpart JJJJ by an allowable alternative compliance method, the Permittee shall use a permanent total enclosure (PTE), a regenerative thermal oxidizer, and operating limits established during the most recent approved performance test to limit organic HAP emissions to not more than 2 percent of the organic HAP applied (98 percent reduction) for each month during each 12-month compliance period. **[Authority: 40 CFR 63, Subpart JJJJ, §63.3320(b)(1) and §63.3370; and Permit-to-Construct No. 025-0423-6-0367 &6-0493 issued 02/15/2022]**

C. Operational Requirements: Whenever the aluminum foil web coating lines are in operation, the Permittee shall demonstrate compliance with the required HAP emissions reduction by maintaining the average combustion zone temperature in the regenerative thermal oxidizer at the minimum operating temperature established during the most recent approved performance test.
[Authority: 40 CFR 63, Subpart JJJJ, § 63.3360(e)(3)(i)(A) and (B)]

D. Operational Requirement: The Permittee shall utilize a permanent total enclosure (PTE) that meets all criteria included under Section 6 of EPA Reference Method 204 of 40 CFR 51, Appendix M to capture one

hundred percent (100%) of all organic HAP evaporated during the web coating, flash-off and curing processes, and all exhaust gases from the PTE shall be vented through a properly functioning regenerative thermal oxidizer before discharge to atmosphere. **[Authority: Permit-to-Construct No. 025-0423-6-0367 & 6-0493 issued 02/15/2022]**

E. Operational Requirement: With regard to continuous parameter monitoring systems (CPMS):

(a) Each CPMS shall complete a minimum of one cycle of operation for each successive 15-minute period. A minimum of four equally spaced successive cycles of CPMS operation are required to have a valid hour of data.

(b) The CPMS shall provide valid data from at least 90 percent of the hours during which the process operated.

(c) The Permittee shall determine the arithmetic average of all valid recorded readings for each 3-hour block period of operation.

(d) Compliance with a standard or limit included in this permit for an operating parameter that the Permittee is required to continuously monitor shall be determined by comparison of the standard or limit with a "valid arithmetic average" determined for the parameter during 3-hour block averaging periods. A "valid arithmetic average" of an operating parameter for a 3-hour block period shall be computed using:

(i) at least nine (9) valid determinations of the operating parameter, each determination made in a separate 15-minute block period during the 3-hour block averaging period; and

(ii) all valid determinations of the operating parameter made during the 3-hour block averaging period.

(e) The Permittee shall record the results of each inspection, calibration, and validation check of the CPMS.

(f) At all times, the Permittee shall maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(g) Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), the Permittee shall conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in 40 CFR §63.3370. The Permittee shall use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(h) Any averaging period for which valid monitoring data are not available and such data are required constitutes a deviation, and the Permittee shall notify the Department and the U.S. EPA in accordance with 40 CFR §63.3400(c).

(i) For any temperature monitoring equipment required by this permit the following shall apply:

(i) The Permittee shall install, calibrate, maintain, and operate the temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every 3 months or the chart recorder, data logger, or temperature indicator shall be replaced. The Permittee shall replace the equipment whether the Permittee chooses not to perform the calibration or the equipment cannot be calibrated properly.

(ii) Each temperature monitoring device required by this permit shall be equipped with a continuous recorder, and the system shall be capable of monitoring and recording temperatures with an accuracy of ±1 percent of the temperature being monitored in degrees Celsius or ±1 degree Celsius, whichever is greater.

(j) The Permittee shall install a thermocouple or other temperature sensor in the combustion chamber at a location in the combustion zone, and shall continuously monitor and record the temperature at that point whenever the coating line is in operation.

[Reference: 40 CFR §63.3350(e) and COMAR 26.11.02.02H]

F. With regard to capture system monitoring: In accordance with 40 CFR §63.3350(f) the Permittee shall develop and implement a site-specific monitoring plan in accordance with the following:

(a) The monitoring plan shall:

(i) Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and

(ii) Explain why this parameter is appropriate for demonstrating ongoing compliance; and

(iii) Identify the specific monitoring procedures.

(b) The monitoring plan shall specify the operating parameter value or range of values that demonstrate compliance with the emission standards in § 63.3320. The specified operating parameter value or range of values shall represent the conditions present when the capture system is being properly operated and maintained.

(c) The Permittee shall conduct all capture system monitoring in accordance with the plan.

(d) Any deviation from the operating parameter value or range of values which are monitored according to the plan shall be considered a deviation from the operating limit.

(e) The Permittee shall review and update the capture system monitoring plan at least annually.

[Reference: 40 CFR §63.3350(f)]

G. Operational Requirement: The Permittee shall develop and implement a startup, shutdown, and malfunction plan (SSMP) in accordance with

applicable requirements and specifications promulgated under 40 CFR 63, Subpart A, §63.6(e)(3). **[Authority: Table 2 to 40 CFR 63, Subpart JJJJ]**

Compliance Demonstration

The Permittee uses a permanent total enclosure (PTE), oxidizer control equipment, and operational limits to comply with the 98 percent HAP reduction limit as specified in 40 CFR 63, Subpart JJJJ, §63.3320(b)(1) and §63.3370. The PTE meets all the criteria established by EPA Reference Method 204 of 40 CFR 51, Appendix M to capture 100 percent of all HAPS evaporated during the coating, flash-off and curing processes. The PTE for EU-10 was evaluated and conformed as a PTE according to the EPA Reference Method 204 of 40 CFR 51, Appendix M during the performance test conducted April 23 and 24, 2003. The PTE for EU-12 was tested and achieved a 100 percent capture efficiency on December 30, 2014.

40 CFR 63, Subpart JJJJ, §63.3360(e)(3)(ii)(C)&(D) outlines the requirements for determining the control device efficiency (destruction or removal efficiency) of the add-on control device and the operating limits required by 40 CFR 63, Subpart JJJJ, § 63.3321.

Gill has a startup, shutdown, and malfunction plan (SSMP) in place that meets the requirements of 40 CFR 63 Subpart A, §63.6(e)(3).

An initial stack test is required by Permit to Construct No. 025-0423-6-0367 and 6-0493 issued February 15, 2022. This test will ensure that the RTO continues to meet standards during the operation of both aluminum foil web coating lines.

Gill is required to maintain the combustion zone temperature of the regenerative thermal oxidizer (EU-12) at 1515 °F (which was the temperature during the most recent performance test).

Gill is required to submit semi-annual compliance reports by the 30th day of the end of each calendar half.

Rationale for Periodic Monitoring

Gill is required to determine whether the oxidizer control devices associated with the aluminum foil web coating lines capture at least 98 percent of all HAP emissions caused by operation of the line and that the PTE captures one hundred percent (100%) of all HAP evaporated during the coating, flash-off and curing processes and those emissions are exhausted through a properly functioning oxidizer before being discharged to atmosphere.

Gill continuously monitors the operating parameters of the regenerative thermal oxidizer, established in accordance with 40 CFR 63, Subpart JJJJ, § 63.3360(e), for each 3-hour period. The operating parameter values are used to demonstrate compliance with the emission standards in 40 CFR 63, Subpart JJJJ, § 63.3320. The operating parameter values shall represent the conditions present when the capture system is being properly operated and maintained.

Subpart JJJJ outlines the specific methods and procedures to demonstrate compliance and requires semi-annual reports to demonstrate compliance status. No additional periodic monitoring is required.

Table IV-4

Emissions Unit:
EU – 11: One (1) boiler, 4.2 MMBtu/hr, fired with natural gas only (ARA Registration No. 025-0423-5-0286)

Applicable Standards and Limits

A. Visible Emissions Limitations:

COMAR 26.11.09.05A(2), which requires that a person not cause or permit the discharge of emissions from any fuel burning equipment, other than water in uncombined form, which is visible to human observers.

Exceptions. **COMAR 26.11.09.05A(3)** establishes that Section A(2) does not apply "to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if: (a) the visible emissions are not greater than 40 percent opacity; and (b) the visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period."

Compliance Demonstration for Visible Emissions Limitations

The Permittee is required to report occurrences of visible emissions from the boiler in accordance with conditions number 4 ("Report of Excess Emissions and Deviations"), and number 9 ("Compliance Certification Report"), of

Rationale for Periodic Monitoring for Visible Emissions Limitations

Small boilers that burn natural gas will generally have no visible emissions. Such boilers are designed to operate automatically, without oversight of an operator, and

require minimal preventive maintenance to maintain a level of combustion performance that does not cause visible emissions. Although the permit imposes no specific schedule for conducting observations of stack emissions, the Permittee is required under the general reporting requirement for excess emissions and deviations to report occurrences of any visible emissions that are observed.

B. Operational Limitation: The Permittee shall burn only natural gas in the boiler unless the Permittee obtains from the Department written authorization to burn alternative fuels. **[Authority: COMAR 26.11.02.09A]**

Compliance Demonstration for the Operational Limitation

The Permittee is required maintain records of the types and quantity of fuel burned to support the annual emissions certification report. The annual certification report must contain the type, quantities, and analyses of all fuels burned. No additional requirements are needed to show compliance with this operational limitation.

Rationale for Periodic Monitoring for the Operational Limitation

No periodic monitoring will be required for the fuel requirement as the Permittee is required maintain records of the types and quantity of fuel burned to support the annual emissions certification report.

COMPLIANCE SCHEDULE

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

TITLE IV – ACID RAIN

Not Applicable

TITLE VI – OZONE DEPLETING SUBSTANCES

Gill is not subject to Title VI requirements.

SECTION 112(r) – ACCIDENTAL RELEASE

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

PERMIT SHIELD

Gill 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 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;

The units are subject to the following requirements:

COMAR 26.11.09.05A(2), which establishes that the Permittee may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers.

Exceptions: COMAR 26.11.09.05A(2) does not apply to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if:

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

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

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

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

No. 2 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;

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

No. 1 Phosphoric Acid Anodizing (PAA) Line (ARA Registration No. 025-0423-6-0297)

No. 1 Duracore Coating Line

STATE ONLY ENFORCEABLE REQUIREMENTS

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

1. Applicable Regulations:

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

   (B) COMAR 26.11.15.05, which requires that the Permittee implement "Best Available Control Technology for Toxics" (T – BACT) to control emissions of toxic air pollutants.

   (C) COMAR 26.11.15.06, which prohibits the discharge of toxic air pollutants to the extent that such emissions will unreasonably endanger human health

2. Record Keeping and Reporting:

   (A) To demonstrate compliance with COMAR 26.11.15.06, the Permittee shall maintain, and shall make available to the Department upon request, written or printable records of the following information:

      (i) For the PAA Line: monthly records of the materials used, including all acid and caustic solutions and cleaners. **[Authority: Permit-to-Construct No. 12-6-0297N issued 07/15/1998]**

      (ii) For the Aluminum Foil Web Coating Lines (EU-10 and EU-12): monthly records of the amount of coating applied (avg. lbs/hr), and hours of operation per month. **[Authority: Permit-to-Construct No. 025-0423-6-0367 issued 03/28/2013]**

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

      (i) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid; or

(iii) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.