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**MARYLAND DEPARTMENT OF THE ENVIRONMENT
AIR AND RADIATION ADMINISTRATION
TITLE V MINOR MODIFICATION APPLICATION**

PART 70 PERMIT APPLICATION FOR MINOR MODIFICATION

TABLE OF CONTENTS

- I. Introduction**
- II. Instructions**
 - A. Overview**
 - B. Federally Enforceable Requirements**
 - ☐ **Cover Page**
 - ☐ **Section 1 Certification Statements**
 - ☐ **Section 2 Facility Description Summary**
 - ☐ **Section 3A- Emissions Unit Descriptions**
 - ☐ **Section 3B- Citation and Description of Applicable Federally Enforceable Requirements**
 - ☐ **Section 4 Control Equipment**

I. Introduction

Minor Modifications to a Part 70 Permit

A Part 70 permittee may apply to the Department to make a minor modification to the federally enforceable provisions of their Part 70 Permit as provided in COMAR 26.11.03.16.

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

- (1) 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 a requirement if it rendered meaningless because the only 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;
- (2) Does not require or modify a:
 - (a.) Case-by-case determination of a federally enforceable emission standard.
 - (b.) Source-specific determination for temporary sources of ambient impacts, or
 - (c.) Visibility or increment analysis;
- (3) Does not seek to establish or modify a federally enforceable permit term or condition for which there is no 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;
- (4) Is not a Title I modification; and
- (5) Is not required to be processed as a significant modification under COMAR 26.11.03.17.

The Department recommends that a permittee request a determination from the Department as to whether a proposed revision qualifies as a minor modification prior to completing an application. When an application is received and the Department upon review determines that the revision does not qualify as a minor modification, the Department will return the application and require the correct application to be completed.

If a change proposed in an application for a minor permit modification requires a permit to construct, a permittee may make the change only after the permit to construct has been issued by the Department. If a proposed change in an application for a minor permit modification does not require a permit to construct, a permittee may make the change at any time after receipt of the application by the Department.

After a permittee makes a change allowed by the minor permit modification regulation and before the Department takes final action to issue the revised permit, a permittee shall comply with both the applicable requirements of the Clean Air Act that relate to the change and the permit terms and conditions described in the application for the modification. During this period of time, a permittee is not

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required to comply with the terms and conditions in the permit that it seeks to modify. If a permittee fails to comply with the permit terms and conditions in the application during this period of time, the terms and conditions in both the permit and in the application may be enforced against it. A permittee is subject to enforcement action if it is determined at any time that a change under the minor modification regulation is not within the scope of this regulation.

An application is not required to be submitted in order to make a minor modification to State-only enforceable requirements. A letter requesting a revision is sufficient.

II. Instructions: Part 70 Permit Application Form for Minor Modification

A. Overview

These instructions are provided to assist facilities in completing the Part 70 Permit Application for a minor modification

The Permittee should submit two copies of the application for a minor modification. One copy remains with the Department. The other copy is for the Environmental Protection Agency. The EPA is provided a 45 day period to review and comment on the draft revised Part 70 permit before the Department issues the revised Part 70 permit that incorporates the proposed change.

If the application contains confidential information, the Permittee shall submit one application with the confidential information clearly marked. In addition, a second copy of the application with the confidential information deleted shall be submitted. On the front of the application forms mark the copies as confidential or non-confidential.

B. Cover Page

1. Include the name and address of the owner or operator, including a telephone number and fax number.
2. Include the name and address of the facility, including the plant manager's name, telephone number, fax number, and an e-mail address.
3. Include a 24-hour emergency telephone number for air pollution matters.
4. Include the name and title of the person that will be the point of contact for permit issues along with the contact person's phone number and e-mail address.

Section 1. Certification of Truth, Accuracy, and Completeness

1. The responsible official for the facility must sign to the truth accuracy, and completeness of the information submitted in the application. The application will be considered incomplete without the signature of a responsible official.
2. Check off the box(s) that apply for the reason for the request for a minor modification.

Section 2. Minor Modification Summary

1. Describe the minor modification and explain its effect on the facility.

2. Check off the appropriate box for the projected facility wide change in emissions of air pollutants that will result from the proposed change. List the quantity of facility wide projected increases or decreases in emissions.

Section. 3A. Emissions Unit Descriptions

Make copies of the blank form as needed.

1. Indicate the emission unit number, assigned by the facility, that identifies this unit from all others within the facility. Include the projected date (month/year) for completion of the proposed change to the emissions.
2. Include any registration number (if applicable), assigned by MDE, that is associated with this emissions unit.
3. Provide a detailed description of the emissions unit, including the emissions point(s) and their assigned number(s), associated with the unit. If the proposed change is a modification of an existing emissions unit, explain how the existing emissions unit is being modified.
4. Indicate any operating schedule limitations that are federally enforceable. Also, cite the references of the applicable federally enforceable requirements, (regulations, permit conditions, consent orders) which require the limitation.
5. Where applicable, specify type(s) of fuel, percent sulfur, and the annual usage of fuel. Be sure to specify the unit(s) of measure for the annual fuel usage.
6. Enter the actual emissions in tons from the emissions unit before the change and the projected emissions in tons after the proposed change.

Section 3B. Citation and Description of Applicable Federally Enforceable Requirements

This section must be completed for each applicable federally enforceable emissions standard/ limit or operational limitation for each emissions unit. Make copies of the blank form as needed.

For each emissions unit:

1. Indicate the assigned emissions unit number. Where some or all of the emission units at a facility are subject to the same applicable emissions

standard or operational limitation and will use the same methodology of compliance demonstration, the applicant may choose to group the emission unit numbers (e.g., "EU1 - EU4" or "Facility-wide"). The grouped emissions units must share the identical standards/limitations and the identical method of compliance demonstration. In addition, if an emissions unit consists of emissions points that have different applicable standards/limits or operational limitations, a separate Section 3B must be submitted for each emissions point for each different standard/limitation.

2. In the "General Reference" space, cite the federally enforceable basis for the emissions standard/limit or operational limitation. This will be either a federal regulation, a state regulation that is included in Maryland's approved State Implementation Plan (SIP), a condition based on a Clean Air Act requirement and is found in a permit to construct, or a condition from a consent order that is part of Maryland's SIP.
3. Briefly summarize the emissions standard/ limit or operational limitation, including any emission standard/limit or operational limitation. If there is more than standard/limitation associated with the emissions unit(s)/point(s), attach a separate form Section 3B for each standard/limitation.
4. For each federally enforceable emissions standard/limit or operational limitation, describe how each emissions unit (emissions point) is monitored and/or tested to demonstrate compliance and indicate any record keeping or reporting activities. Indicate the reference (federally enforceable basis) for the monitoring, record keeping, reporting, and testing requirements. If the basis is not a federal regulation, a state regulation that is included in Maryland's approved SIP, a federally enforceable permit to construct condition, or a condition in a consent order that is in Maryland's approved SIP, indicate the reference as "COMAR 26.11.03.06C, proposed periodic monitoring".

The applicant is required to propose periodic monitoring when the basis for a federally enforceable emissions standard/limit or operational limitation does not have associated testing, monitoring, record keeping or reporting requirements sufficient for the applicant to demonstrate compliance with the emissions standard/limit or operational limitation. Periodic monitoring is not required for emissions units subject to New Source Performance Standards under 40 CFR Part 60 that were promulgated after August 1990, or subject to any Maximum Achievable Control Technology (MACT) Standards promulgated under 40 CFR Part 63.

5. Indicate the frequency of submittal of monitoring reports and the compliance certification. Check off the reports that are required to be submitted. Every facility is required to submit a semi-annual monitoring

report and an annual emissions certification. See COMAR 26.11.03.06C(7) and G(6). Many sources that require the use of continuous emissions monitors (CEMs) to demonstrate compliance with an emissions standard/limit are required to submit quarterly reports.

Section 4. Control Equipment

This form is to be used to describe, where applicable, each piece of control equipment associated with each emissions point. If more than one piece of equipment is used in series to control the emissions from an emissions point, complete a separate Section 4 form for each. Make copies of the blank form as needed.

1. Describe the type of control equipment.
2. Indicate the associated emissions unit number.
3. Indicate the associated emissions point number.
4. List the pollutant(s) that is (are) being controlled and the applicable control efficiency for each pollutant.
5. Specify the capture efficiency of the equipment if it is less than 100%.

MARYLAND DEPARTMENT OF THE ENVIRONMENT

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PART 70 PERMIT APPLICATION FOR MINOR MODIFICATION
AIR AND RADIATION ADMINISTRATION

This application form shall be used by facilities that request a minor modification to its Part 70 Operating Permit. A minor permit modification is a Part 70 revision that meets the criteria of COMAR 26.11.03.16B.

Owner and Operator:

Name of Owner or Operator:		
Street Address:		
City:	State:	Zip Code:
Telephone Number		Fax Number

Facility Information:

Name of Facility:		
Street Address:		
City:	State:	Zip Code:
Plant Manager:	Telephone Number:	Fax Number:
24-Hour Emergency Telephone Number for Air Pollution Matters:		
Contact for Permit Issues:	Title:	
Telephone Number:	E-Mail Address:	



**SECTION 1. CERTIFICATION OF TRUTH, ACCURACY, AND
COMPLETENESS**

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

RESPONSIBLE OFFICIAL:

X _____

SIGNATURE

DATE

PRINTED NAME

TITLE

Reason for the Request for a Minor Modification:

(check appropriate box(s) below)

- ☐ Install new emissions units of like kind to units in the current Part 70 permit and will use the same testing, monitoring, record keeping and reporting requirements to demonstrate compliance with applicable standards.
- ☐ Modify an emissions unit. The modification will not result in new standards and limitation, and the testing, record keeping , monitoring and reporting requirements to demonstrate compliance will remain unchanged.
- ☐ Install or modify an emissions unit that is not a Title I modification.
- ☐ Revise Testing, Monitoring, Record Keeping or Reporting in a manner that is not significant.



SECTION 2. MINOR MODIFICATION SUMMARY

1. Effect on the Facility

Briefly describe the minor modification and its effect on the facility:

2. Projected Facility-Wide Emissions After the Minor Modification

☐ There will be no change in emissions.

☐ There will be a net increase in emissions.

List the projected actual facility-wide emissions increase (in tons) below:

PM₁₀_____ NO_x_____ VOC_____ SO_x_____ CO_____

HAPs_____

☐ There will be a net decrease in emissions.

List the projected actual facility-wide emissions decrease (in tons) below:

PM₁₀_____ NO_x_____ VOC_____ SO_x_____ CO_____

HAPs_____



SECTION 3A. EMISSIONS UNIT DESCRIPTIONS

1. Emissions Unit No.: Date of proposed change (month/year):	2. MDE Registration No.:(if applicable)												
3. Detailed description of the emissions unit, including all emission point(s) and the assigned number(s): 													
4. Federally Enforceable Limit on the Operating Schedule for this Emissions Unit: General Reference: _____ Continuous Processes: _____ hours/day _____ days/year Batch Processes: _____ hours/batch _____ batches/day _____ days/year													
5. Fuel Consumption: <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; width: 40%;">Type(s) of Fuel</th> <th style="text-align: left; width: 30%;">% Sulfur</th> <th style="text-align: left; width: 30%;">Annual Usage (specify units)</th> </tr> </thead> <tbody> <tr> <td>1. _____</td> <td></td> <td></td> </tr> <tr> <td>2. _____</td> <td></td> <td></td> </tr> <tr> <td>3. _____</td> <td></td> <td></td> </tr> </tbody> </table>		Type(s) of Fuel	% Sulfur	Annual Usage (specify units)	1. _____			2. _____			3. _____		
Type(s) of Fuel	% Sulfur	Annual Usage (specify units)											
1. _____													
2. _____													
3. _____													
6. Emissions in Tons: A. Actual Emissions Before Modification: NOx_____ SOx_____ VOC_____ PM10_____ HAPs_____ B. Projected Actual Emissions After Modification: NOx_____ SOx_____ VOC_____ PM10_____ HAPs_____													



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

Emissions Unit No.: _____ General Reference: _____

Briefly describe the Emission Standard/Limit or Operational Limitation:

Compliance Demonstration:

Methods used to demonstrate compliance:

Monitoring: Reference _____ Describe: _____

Testing: Reference _____ Describe: _____

Record Keeping: Reference _____ Describe: _____

Reporting: Reference _____ Describe: _____

Frequency of submittal of the compliance demonstration:

Check appropriate reports required to be submitted:

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



SECTION 4. CONTROL EQUIPMENT

1. <u>Associated Emissions Units No.</u> :	2. <u>Emissions Point No.</u> :
3. <u>Type and Description of Control Equipment</u> :	
4. Pollutants Controlled:	Control Efficiency:
5. Capture Efficiency:	

