March 30, 2017

Associate Director
Office of Enforcement and Permit Review (3AP10)
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Cherry Hill Plant, Part 70, Title V Permit to Operate Number 24-015-00079
2016 Part 70 Compliance Certification Report

Associate Director:

Attached please find the 2016 Part 70 Compliance Certification Report, which includes two sections, a Federal section and a State section. The Federal portion includes the Federal forms used for certifying plant-specific conditions (Section IV of the Part 70 permit) and the State portion includes the ARMA form used for certifying plant-wide conditions (Section III of the Part 70 permit).

Please feel free to call me at (410) 398-6400, if you have any questions or concerns.

Sincerely,

Matthew Rendon
Environmental Associate

cc: Christopher Wheeling, MDE
CH File

W. L. Gore & Associates, Inc.
Core Technology
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U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

FORM A-COMP - ANNUAL COMPLIANCE CERTIFICATION

INSTRUCTIONS: There are 3 pages to this form. On this page, complete Sections A and B once with respect to the entire annual compliance Certification.

A. GENERAL INFORMATION

1. **Identifying Information.**

Source or company name **W.L.Gore & Associates, Inc., Cherry Hill Plant**

Mailing address: Street or P.O.Box 2401 Singerly Road

City Elkton State MD ZIP 21921 -

Contact person Matthew Rendon Title Environmental Associate

Telephone (410) 398 - 6400 Ext. 62430 Part 71 permit no. 24-015-0079

2. **Reporting Period** The reporting period should be the one-year, or shorter period, required by your part 71 permit. It will be assumed that the beginning date begins and ends at Midnight (12 A.M.), unless you specify otherwise.

Period beginning 1 / 1 /2016 **Period ending 12 / 31 / 2016**

B. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

1. **RESPONSIBLE OFFICIAL:** Identify the responsible official and provide contact information.

Name: (Last) Hawke (First) Sally (Middle) A

Title Plant Leader

Street or Post Office Box 2401 Singerly Road

City Elkton State MD ZIP 21921 -

Telephone (410) 398 - 6400 Ext. Facsimile (410) 398 - 5752

2. **Certification of Truth, Accuracy and Completeness.** The Responsible Official must sign this statement after the form is completed for each applicable requirement.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate, and complete.

Name (signed) Sally A. Hawke

Name (printed or typed) Sally A. Hawke Date: 3/29/2017

INSTRUCTIONS: Use this page to describe the compliance status of each permit term or condition. This page may be used to provide information on 2 different permit terms or conditions. Copy this page as many times as necessary to cover all permit terms and conditions.

C1. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 1-1. **Applicable Standards and limits:** A. **Visible Emissions** COMAR 26.11.06.02C(1) – Visible Emission Standards. "A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is greater than 20 percent opacity." Filled Products front end controlled by baghouse & Fugitive Emission	EU 1-1. – Particulate Matter Emitting Units **(6-0104** M)	X Intermittent Compliance ___ Continuous Compliance

D1. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: A. None.	___ Intermittent Compliance X Continuous Compliance
Monitoring Requirements: A. Conducts a monthly 6-minute visual observation of the baghouse exhaust while it is in operation. If no visible emissions are observed in six consecutive monthly observations, the frequency will be decreased from monthly to quarterly for the baghouse exhaust. If visible emissions are observed during any quarter visual observation, the frequency will be resumed to monthly observations and maintain that schedule until no visible emissions are observed in six consecutive monthly visual observations. If visible emissions are observed during any observation, an 18-minute test of opacity in accordance with Method 9, shall begin within 24-hours of any observation of visible emissions. **[Reference: COMAR 26.11.03.06C]** *During this reporting period, observations were conducted as required, and no visible emissions were observed.*	___ Intermittent Compliance X Continuous Compliance
Record Keeping Requirements: A. Maintains on site, a log of the dates and results of visible emissions observations for a period of at least 5 years. **[Reference: COMAR 26.11.03.06C].** *During this reporting period, observations were conducted and records will be maintained on site for a period of at least 5 years.*	___ Intermittent Compliance X Continuous Compliance
Reporting Requirements: A. Shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations." *Visible emissions were reported.*	___ Intermittent Compliance X Continuous Compliance

C2. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 1-1. **Applicable Standards and limits:** B. **Particulate Matter** COMAR 26.11.06.03B(1) – Particulate Matter from Confined Sources. "A person may not cause or permit particulate matter to be discharged from any installation constructed on or after January 17, 1972 in excess of 0.05 gr/scfd (115 kg/dscm)." Filled Products front end controlled by baghouse & Fugitive Emission	EU 1-1. – Particulate Matter Emitting Units **(6-0104** M)	___ Intermittent Compliance _X_ Continuous Compliance

D2. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: B. None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: B. Maintains a preventive maintenance plan for the baghouse that describes the maintenance activity and time schedule for completing each activity. Perform maintenance activities within the time frames established in the plan and maintain a log with records of the dates and description of the maintenance that was performed. **[Reference: COMAR 26.11.03.06C].** *Maintenance activities are scheduled through an electronic database that automatically triggers work orders for required maintenance and documents the completion of work. The plant's leadership team holds associates accountable for performing maintenance activities within the time frame established by the plan.*	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: B. Maintains a copy of the preventive maintenance plan and a record of the dates of and description of maintenance activity performed. Maintain records of the baghouse malfunctions and the corrective actions taken to bring into proper operation. **[Reference: COMAR 26.11.03.06C].** *Documentation is maintained in the electronic database.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: B. *A copy of the preventive maintenance plan, records of maintenance activities and corrective actions are available to the Department upon request.* **[Reference: COMAR 26.11.03.06C].**	___ Intermittent Compliance _X_ Continuous Compliance

C3. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-1. **Applicable Standards and limits:** A. **Visible Emissions** COMAR 26.11.09.05A(1) - Fuel Burning Equipment. "A person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is greater than 20 percent opacity." Exceptions. COMAR 26.11.09.05A(3) "Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, start-up, or occasional cleaning of control equipment which do not exceed 40 percent opacity for a period or periods aggregating not more than 6 consecutive minutes in any 60 minutes." **[4-0223 & 4-0224]** – Two Burnham No. 2 Fuil oil/propane gas fired boilers each rated at 9.45 million Btu per hour heat input and equipped with low NOx burners (Boilers #4 & #5) **[4-0156]** - One Weil McLain No. 2 fuel oil boiler rated at 4.9 million Btu per hour heat input (boiler #1). **[4-0200]** - One Weil McLain No. 2 fuel oil boiler rated at 8.6 million Btu per hour heat input (boiler #3).	EU 2-1. – Boilers	___ Intermittent Compliance _X_ Continuous Compliance

D3. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: A. None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: A. Operate and maintain the boilers in a manner to prevent visible emissions. [**Reference: COMAR 26.11.03.06C**]. *Routine and non-routine maintenance activities are scheduled through an electronic database that automatically triggers work orders for required maintenance and documents the completion of work. Additionally, routine maintenance activities to be completed by contractors are scheduled quarterly and during plant shutdowns. Non-routine maintenance activities to be completed by contractors are scheduled as needed.*	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: A. Maintain an operations manual and preventive maintenance plan for the boilers. Maintain a log of maintenance performed that relates to combustion performance [**Reference: COMAR 26.11.03.06C**]. *Routine and non-routine maintenance activities are scheduled through an electronic database that automatically triggers work orders for required maintenance and documents the completion of work. Additionally, routine maintenance activities to be completed by contractors are scheduled quarterly and during plant shutdowns. Non-routine maintenance activities to be completed by contractors are scheduled as needed. Upon completion, contractors provide written documentation of the maintenance activities performed. Maintenance records are kept for 5 years.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: A. Report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". *Visible emissions were reported as required.*	___ Intermittent Compliance _X_ Continuous Compliance

C4. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-1. **Applicable Standards and limits:** B. **Control of Sulfur oxides.** COMAR 26.11.09.07A(1)(c) – Sulfur Content Limitation for Fuel. "A person may not burn, sell, or make available for sale any distillate fuel with a sulfur content by weight in excess of 0.3 percent." **[4-0223 & 4-0224]** – Two Burnham No. 2 Fuil oil/propane gas fired boilers each rated at 9.45 million Btu per hour heat input and equipped with low NOx burners (Boilers #4 & #5) **[4-0156]** - One Weil McLain No. 2 fuel oil boiler rated at 4.9 million Btu per hour heat input (boiler #1). **[4-0200]** - One Weil McLain No. 2 fuel oil boiler rated at 8.6 million Btu per hour heat input (boiler #3).	EU 2-1. – Boilers	___ Intermittent Compliance _X_ Continuous Compliance

D4. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: B. None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: B. *The Bill of Lading for each fuel shipment includes the sulfur content of the fuel, indicating that the oil complies with the limitation on the sulfur content of fuel oil.* **[Reference: COMAR 26.11.03.06C]**.	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: B. *Fuel supplier Bills of Lading that are received with every shipment are kept for at least 5 years.* **[Reference: COMAR 26.11.09.07C].**	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: B. *Bills of Lading for fuel shipments are available to the Department upon request* **[Reference: COMAR 26.11.09.07C]**.	___ Intermittent Compliance _X_ Continuous Compliance

C5. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-1. **Applicable Standards and limits:** C. **Operational Limitation**: The boilers shall burn No. 2 fuel oil, used oil or waste combustible fluids only. [Reference: MDE Permit to Construct Nos. 015-0079-4-0223 &4-0224, 4-0156, & 4-0200 Part C(2) issued Feb. 8, 2008] **[4-0223 & 4-0224]** – Two Burnham No. 2 Fuil oil/propane gas fired boilers each rated at 9.45 million Btu per hour heat input and equipped with low NOx burners (Boilers #4 & #5) **[4-0156]** - One Weil McLain No. 2 fuel oil boiler rated at 4.9 million Btu per hour heat input (boiler #1). **[4-0200]** - One Weil McLain No. 2 fuel oil boiler rated at 8.6 million Btu per hour heat input (boiler #3).	EU 2-1. – Boilers	___ Intermittent Compliance _X_ Continuous Compliance

D5. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: C. None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: C. None.	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: C. *Records of plant-wide fuel usage and hours of operation of the boilers are retained* **[MDE Permit to Construct Nos 015-0079-4-0223 & 4-0024, 4-0156, & 4-0200 Part D(1) issued Feb. 8, 2008]**	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: C. *Records of the quantity and type of fuels burned are submitted with the annual emissions certification report.* **[See permit condition 8 of Section III].**	___ Intermittent Compliance _X_ Continuous Compliance

C6. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-1. **Applicable Standards and limits:** Control of HAPs: **40 CFR Part 63, Subpart JJJJJJ – Requirements for Existing Oil Fired Boilers less than 10 million BTU/hr heat input** 1. "You must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler." **[Reference: 10 CFR §63.11201(b)]** a. "Existing or new biomass or oil – Conduct a tune-up of the boiler biennially as specified in §63.11223." **[Reference: CFR §63.11201(b) and Table 2, Item 3]** 2. "These standards apply at all times." **[Reference: 40 CFR§63.11201(d)]** 3. "If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management standard no later than March 21, 2014." **[Reference: 40 CFR §63.11196(a)(1) and 40 CFR§63.11210(c)]**	EU 2-1. – Boilers	___ Intermittent Compliance X Continuous Compliance

D6. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: Control of HAPs: 1. The Permittee must conduct a biennial performance tune-up no more than 25 months after the previous tune-up. **[Reference: 40 CFR §63.11223(a)]** 2. The Permittee must conduct a biennial tune-up of the boiler to demonstrate continuous compliance as specified below: a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months). b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. d. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available. e. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). f. Maintain onsite and submit, if requested by the Department, a biennial report containing the following information: I. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler. II. A description of any corrective actions taken as a part of the tune-up of the boiler. III. The type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler. g, If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. **[Reference: 40 CFR §63.11223(b)(1) through (7)]** *Boiler tune-up was completed in 2014. Records are available upon request.*	___ Intermittent Compliance X Continuous Compliance
Monitoring Requirements: Control of HAPs: 1. The Permittee must operate and maintain, at all times, any affected source, including air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. **[Reference: 40 CFR §63.11205(a)]** *Boilers are maintained to minimize emissions.*	___ Intermittent Compliance X Continuous Compliance

Record Keeping Requirements: Control of HAPs: 1. The Permittee must keep a copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that is submitted as required in 40 CFR §63.10(b)(2)(xiv). **[Reference: 40 CFR §63.11225(c)(1)]** 2. The Permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR §63.11214 as follows: a. Records must identify each boiler, the date of tune-up, the procedures followed for a tune-up and the manufacturer's specifications to which the boiler was tuned. b. Records documenting the fuel type(s) used monthly by each boiler, including, but not limited to, a description of the fuel and the total fuel usage amount with units of measure. **[Reference 40 CFR §63.11225(c)(2)]** 3. The permittee must keep records of the occurrence and duration of each malfunction of the boiler or of associated air pollution control equipment and monitoring equipment. **[Reference: 40 CFR §63.11225(c)(4)]** 4. The Permittee must keep records of actions taken during periods of malfunctions to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR §63.11205(a), including corrective actions to restore the malfunctioning boiler to it's normal or usual manor of operation. **[Reference: 40 CFR §63.11225(c)(5)]** 5. The Permittee must keep the records in a form suitable and readily available for expeditious review. Each record must be kept for five (5) years following the date of each recorded action. The records must remain on site for at least two (2) years after the date of each recorded action. **[Reference: 40 CFR §63.11225(d)]** *Initial notification was submitted in September 2011. Copies of notifications and reports are kept onsite for at least 5 years. All maintenance records and fuel usage records are maintained onsite for at least 5 years.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: Control of HAPs: 1. The Permittee must submit all applicable notifications in 40 CFR §63.7(b), §63.8(e), §63.9(b) through (e), and 63.9(g) and (h). **[Reference: 40 CFR §63.11225(a)(1)]** 2. The Permittee must submit an Initial Notification, as specified in 40 CFR §63.9(b)(2), no later than January 20, 2014 or within 120 days after the source becomes subject to the standard. **[Reference: 40 CFR §63.11225(a)(2)]** 3. The Permittee must submit the Notification of Compliance Status in accordance with 40 CFR §63.9(h) no later than 120 days after the applicable compliance date specified in 40 CFR §63.11196. In addition to the information required in 40 CFR §63.9(h)(2), your notification must include the following certification of compliance, as applicable, and signed by the responsible official: "This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler." **[Reference: 40 CFR §63.11225(a)(4)(i) and40 CFR §63.11214(b)]** 4. By March 1 of each affected calendar year, the Permittee must prepare a biennial compliance certification report for the previous two (2) calendar years containing the information specified in 40 CFR §63.11225(b), The Permittee must submit the report by March 15 if the Permittee had any instance described by 40 CFR §63.11225(b)(3). The compliance report must contain the following information: a. Company name and address b. Statement by a responsible official certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and requirements of 40 CFR §63, Subpart JJJJJJ. c. If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, time periods during which the deviations occurred, and the corrective actions taken. **[Reference: 40 CFR §63.11225(b)(1) through (3)]** *Initial notification was submitted in September 2011. The lastest biennial compliance certification was filed in June 2014.*	___ Intermittent Compliance _X_ Continuous Compliance

C7. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-2. **Applicable Standards and limits:** A. Control of Visible Emissions: COMAR 26.11.09.05B - Stationary Internal Combustion Engine Powered Equipment (2) Emissions During Idle Mode. A person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity (3) Emissions During Operating Mode. A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity. (4) Exceptions (a) Section B(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system. (b) Section B(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods: (i) Engines that are idled continuously when not in service: 30 minutes; (ii) All other engines: 15 minutes (c) Section B(2) and (3) does not apply while maintenance, repair, or testing is being performed by qualified mechanics. [9-0169] – One Onan 1200 bhp (800 kW) diesel emergency generator	EU 2-2. – Emergency Generator	___ Intermittent Compliance _X_ Continuous Compliance

D7. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: A. The emergency generator shall operate and be maintained in a manner to prevent visible emissions. **[Reference: COMAR 26.11.03.06C]** *A preventive maintenance plan is maintained. Routine and non-routine maintenance activities are scheduled through an electronic database that automatically triggers work orders for required maintenance and documents the completion of work.*	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: A. An operations manual and preventative maintenance plan must be in place. A log of maintenance performed that relates to combustion performance must be maintained. **[Reference: COMAR 26.11.03.06C].** *An operations manual and preventive maintenance plan has been established. Routine and non-routine maintenance activities are scheduled through an electronic database that automatically triggers work orders for required maintenance and documents the completion of work. A log that tracks run time and maintenance is in place.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: A. Incidents of visible emissions shall be reported in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations" *No visible emissions were observed during this reporting period.*	___ Intermittent Compliance _X_ Continuous Compliance

C8. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-2. **Applicable Standards and limits:** B Control of Sulfur Oxides Emissions: COMAR 26.11.09.07A(1)(c) – Sulfur Content Limitations for Fuel. "A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: Distillate fuel oils, 0.3 percent." [9-0169] – One Onan 1200 bhp (800 kW) diesel emergency generator	EU 2-2. – Emergency Generator	___ Intermittent Compliance _X_ Continuous Compliance

D8. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: B None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: B. *A certification from the fuel supplier is received with every shipment indicating that the oil complies with the limitation on the sulfur content of fuel oil. In 2014, no fuel deliveries were made for the generator.* **[Reference: COMAR 26.11.03.06C]**	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: B *Fuel supplier certifications that are received with every shipment are kept for at least 5 years.* **[Reference: Permit go construct No. 9-0169, Part E(2)].**	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: B *Fuel supplier certifications are available to the Department upon request.* **[Reference: COMAR 26.11.09.07C].**	___ Intermittent Compliance _X_ Continuous Compliance

C9. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-2. **Applicable Standards and limits:** C Operational Limit: The emergency diesel generator shall be used for emergency use only and shall not operate more than 500 hours a year. **[Refernce: Permit to construct No. 9-0169, Part D(2)]** [9-0169] – One Onan 1200 bhp (800 kW) diesel emergency generator	EU 2-2. – Emergency Generator	___ Intermittent Compliance _X_ Continuous Compliance

D9. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: C None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: C *A log for the emergency generator indicating the amounts of fuel oil combusted, the hours of operation, and the reason for generator operation is maintained.* **[Reference: Permit to construct No. 9-0169, Part E(1)]**	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: C Logs must be maintained on site for five years and must be available to the Department upon request. **[Reference: Permit to construct No. 9-0169, Part E(2)]** *Operation logs are currently being maintained electronically, and will be maintained for five years.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: C *A record of the logs was submitted with the annual emissions certification report.*	___ Intermittent Compliance _X_ Continuous Compliance

C10. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-2. **Applicable Standards and limits:**	EU 2-2. – Emergency Generator	___ Intermittent Compliance _X_ Continuous Compliance

§63.6595 – When do I have to comply with this subpart?
(a) *Affected Sources*. (1)".....If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, **or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013.** .....".

§63.6603 – What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?
Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this subpart.
(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 1b and Table 2b to this subpart that apply to you,

Table 2d to Subpart ZZZZ of Part 63 – Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions
As stated in §63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

For Each...	You Must meet the following requirement, except during periods of startup ...
4. Emergency stationary CI RICE and black start stationary CI RICE.[2]	a. Change oil and filter every 500 hours of operation or annually, whichever comes first;[1]
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

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

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

§63.6605 – What are the general requirements for complying with this subpart?
(a) You must be in compliance with the4 emission limitations and operating limitations in the subpart that apply to you at all times.
(b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[9-0169] – One Onan 1200 bhp (800 kW) diesel emergency generator

D10. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: **§63.6625 – What are my monitoring, installation, collection, operation, and maintenance requirements?** "(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions: (3)An **existing emergency** or black start stationary RICE located at an area source HAP emissions." "(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or **an existing emergency stationary RICE located at an area source of HAP emissions**, you must install a non-resettable hour meter if one is not already installed." "(h) If you operate a new, reconstructed, or **existing stationary engine**, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a,2a 2c and 2d to this subpart apply. (i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; ore percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance pland for the engine." **§63.6640 – How do I demonstrate continuous compliance with the4 emission limitations and operating limitations?** (a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subject. (b) You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary y RICE. "(f) *Requirements for emergency stationary RICE.* (1) If you own or operate an existing emergency stationary RICE with a site rating of less that or equal to 500 brake HP located at a major source of HAP emissions, a new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that was installed on or after June 12, 2006, or **an existing emergency stationary RICE located at an area source of HAP emissions**, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines. (i) There is no time limit on the use of emergency stationary RICE in emergency situations. (ii) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required in the owner or operator maintains records indicating the Federal, State, or local standards require	___ Intermittent Compliance _X_ Continuous Compliance

maintenance and testing of emergency RICE beyond 100 hours per year. (iii) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for the facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power." *Oil is changed annually in the generator.* *The generator is operated in a manner to minimize emissions.* *The generator has a non-resettable hour meter.* *The generator was operated a total of 14.1 hours in 2014 for maintenance, testing, and emergency situations.*	
Record Keeping Requirements: **§63.6655 – What records must I keep?** (e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operated any of the following stationary RICE; (2) An existing stationary emergency RICE. (3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart. (f) If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. (2) An existing emergency stationary RICE locate at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines. *Records of maintenance and a log showing hours of operation are maintained for the generator.*	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: "Sources must report any failure to perform the management practice on the schedule required and the Federal, State, or local law under which the risk was deemed unacceptable." **[Footnote 2 of Table 2d]** *No reporting was required in 2014.*	___ Intermittent Compliance _X_ Continuous Compliance

C11. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 3-1, EU 3-2, EU 3-3 & EU 3-4 **Applicable Standards and limits:** A. **Control of Volatile Organic Compounds** COMAR 26.11.19.02I – Good Operating Practices, Equipment Cleanup, and VOC Storage. (1) Applicability. "The requirements in this section apply to a person who owns or operates an installation that is subject to any requirement in this chapter." (2) Good Operating Practices. (a) "A person who is subject to this section shall implement good operating practices to minimize VOC emissions into the atmosphere. (b) Good operating practices shall, at a minimum, include the following: (i) Provisions for training of operators on practices, procedures, and maintenance requirements that are consistent with the equipment manufacturers' recommendations and the source's experience in operating the equipment, with the training to include proper procedures for maintenance of air pollution control equipment; (ii) Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use; (iii) As practical, scheduling of operations to minimize color or material changes when applying VOC coatings or other materials by spray gun; (iv) For spray gun applications of coatings, use of high volume low pressure (HVLP) or other high efficiency application methods where practical;-and (v) As practical, mixing or blending materials containing VOC in closed containers and taking preventive measures to minimize emissions for products that contain VOC. I A person subject to this regulation shall: (i) Establish good operating practices in writing; (ii) Make the written operating practices available to the Department upon request; and (iii) Display the good operating practices so that they are clearly visible to the operator or include them in operator training. (3) Equipment Cleanup. (a) A person subject to this section shall take all reasonable precautions to prevent or minimize the discharge of VOC into the atmosphere when cleaning process and coating application equipment, including containers, vessels, tanks, lines, and pumps. (b) Reasonable precautions for equipment cleanup shall, at a minimum, include the following: (i) Storing all wastes and waste materials, including cloth and paper that are contaminated with VOC, in closed containers; (ii) Preparing written standard operating procedures for frequently cleaned equipment, including when practical, provisions for the use of low-VOC or non-VOC materials and procedures to minimize the quantity of VOC materials used; (iii) Using enclosed spray gun cleaning, VOC-recycling systems and other spray gun cleaning methods where practical that reduce or eliminate VOC emissions; and (iv) Using, when practical, detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines, containers, and process equipment. (4) VOC Storage and Transfer. (a) A person subject to this section who stores VOCs shall, at a minimum, install conservation vents or other vapor control measures on storage tanks with a capacity of 2,000 gallons or more, to minimize VOC emissions. (b) A person subject to this section shall, at a minimum, utilize vapor balance, vapor control lines, or other vapor control measures when VOCs are transferred from a tank truck into a stationary storage tank with a capacity greater than 10,000 gallons and less than 40,000 gallons that store VOCs or materials containing VOCs, other than gasoline, that have a vapor pressure greater than 1.5 psia." EU 3-1: Natural FPM Product Area vented through the oxidizer control system EU 3-2: Filled FPM Products Area vented through the oxidizer control system EU 3-3: FPM Processing Area vented to atmosphere EU 3-4: Ovens vented to Oxidizer control system Please Note: The oxidizer control system includes the following oxidizers: SARA (oxidizer #1), T-Ox (oxidizer #2) and WILLIE (oxidizer #3).	EU 3-1: Natural FPM Production Area EU 3-2: Filled FPM Processing Area EU 3-3: FPM Processing Area E 3-4: Ovens	_X_ Intermittent Compliance ___ Continuous Compliance

D11. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: Control of VOC Emissions *Monthly Facility-wide inspections are performed, to determine the compliance status with regard to "good operating practices".* **[Reference: COMAR 26.11.03.06C]**	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: *The following is maintained:* 1) *Written descriptions of all "good operating practices" designed to minimize VOC emissions from facility-wide operations.* **[Reference: COMAR 26.11.19.02I]** 2) *Records of all inspections, which include the name of the inspector, the date and time of the inspection, and an account of the findings.* **[Reference: COMAR 26.11.03.06C]**	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: *Good operating practices are available to the Department upon request*	___ Intermittent Compliance _X_ Continuous Compliance

C12. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 2-2, 3-1, EU 3-2, EU 3-3 & EU 3-4, 4-1 **Applicable Standards and limits:** Control of VOC Emissions **COMAR 26.11.19.16C** - Control of VOC Leaks General Requirements. "A person subject to this regulation shall comply with all of the following requirements: (1) Visually inspect all components on the premises for leaks at least once each calendar month. (2) Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date the leak was discovered, and the name of the person who discovered the leak. The tag shall remain in place until the leak has been repaired. (3) Take immediate action to repair all observed VOC leaks that can be repaired within 48 hours. (4) Repair all other leaking components not later than 15 days after the leak is discovered. If a replacement part is needed, the part shall be ordered within 3 days after discovery of the leak, and the leak shall be repaired within 48 hours after receiving the part. (5) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipe fittings. (6) Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, and a list of leaks by tag identification number. The log shall be made available to the Department upon request. Leak records shall be maintained for a period of not less than 2 years from the date of their occurrence." **COMAR 26.11.19.16D**. Exceptions. "Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, shall be identified in the log and included within the source's maintenance schedule for repair during the next source shutdown."	EU 2-2: Emergency Generator EU 3-1: Natural FPM Production Area EU 3-2: Filled FPM Processing Area EU 3-3: FPM Processing Area E 3-4: Ovens EU 4-1: VOC Storage Tanks	___ Intermittent Compliance ___ Continuous Compliance

D12. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: A. None.	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: 1) *Monthly inspections for VOC leaks are completed at least once each calendar month and are part of the "Site Inspection" form;* 2) *Leaks are tagged immediately with I.D. Number, the date leak was discovered, and the name of the person who discovered the leak. The tag remains in place until the leak is repaired;* 3) *Immediate action is taken to repair/control all observed leaks that can be repaired within 48 hours;* 4) *All other leaking components are repaired not later than 15 days after the leak is discovered in accordance with COMAR 26.11.19.16C(4);* 5) *If a replacement part is needed, it is ordered within 3 days after discovery of the leak, and the leak is repaired within 48 hours after receiving the part;* 6) *A supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced is maintained; and* 7) *Components that are inaccessible and cannot be repaired or that cannot be repaired during operation of the source, are documented in the maintenance database and are scheduled for repair during the next source shutdown.* **[Reference: COMAR 26.11.19.16C and D]**	___ Intermittent Compliance _X_ Continuous Compliance
Record Keeping Requirements: 3) *Logs that include the name of the inspector, the date of the leak inspection, and the findings, a list of leaks by tag identification number, the date the part was ordered, and the date the leak was repaired are maintained; and* *Logs are available to the Department upon request and are maintained for a period of not less than two years from the date of the leaks' occurrence.* **[Reference: COMAR 26.11.19.16C(6)]**	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: A. *Leak inspection logs are available to the Department upon request.*	___ Intermittent Compliance _X_ Continuous Compliance

C13. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 3-1, EU 3-2, EU 3-3 & EU 3-4 **Applicable Standards and limits:** A. **Visible Emissions.** COMAR 26.11.06.02C(1) – Visible Emission Standards. "A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is greater than 20 percent opacity." EU 3-1: Natural FPM Product Area vented through the oxidizer control system EU 3-2: Filled FPM Products Area vented through the oxidizer control system EU 3-3: FPM Processing Area vented to atmosphere EU 3-4: Ovens vented to Oxidizer control system Please Note: The oxidizer control system includes the following oxidizers: SARA (oxidizer #1), T-Ox (oxidizer #2) and WILLIE (oxidizer #3).	EU 3-1: Natural FPM Production Area EU 3-2: Filled FPM Processing Area EU 3-3: FPM Processing Area E 3-4: Ovens	X Intermittent Compliance ___ Continuous Compliance

D13. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: A.None.	___ Intermittent Compliance X Continuous Compliance
Monitoring Requirements: A. Visually inspects the exhaust of the oxidizer control system at least monthly for a 6-minute period when the process lines are in operation and records the results of each observation. If no visible emissions are observed in six consecutive monthly observations, the frequency of visual observation will decrease from monthly to quarterly. If emissions are visible greater than 20 percent opacity from oxidizer control system, the following will be performed, unless it can be shown, through a Method 9 test, that the visible emissions are zero percent opacity: (a) inspect all process and/or control equipment related to emission point; (b) perform all necessary repairs and/or adjustments to the oxidizers, within 48 hours, so that visible emissions in the exhaust gases are less than 20 percent opacity; and (c) document, in writing, the results of the inspections and the repairs and/or adjustments made to the oxidizer control system. If visible emissions greater than 20% opacity have not been eliminated within 48 hours, a Method 9 observation shall be performed once daily when the process lines are in operation until the visible emissions have been reduced to less than 20 percent opacity. **[Reference: COMAR 26.11.03.06C]** *During this reporting period, observations were conducted as required, and no visible emissions were observed.*	___ Intermittent Compliance X Continuous Compliance
Record Keeping Requirements: A. The Permittee shall keep records of results of visual emission observations and document any incidence of visible emissions and corrective action taken by the Permittee. **[Reference: COMAR 26.11.03.06C].** *Records of observations are maintained on site.*	___ Intermittent Compliance X Continuous Compliance
Reporting Requirements: A. Incidents of visible emissions will be reported in accordance with Permit Condition 4, Section III, "Report of Excess Emissions and Deviations". *Visible emissions were reported.*	___ Intermittent Compliance X Continuous Compliance

C14. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period
EU 3-1, EU 3-2, EU 3-3 & EU 3-4 **Applicable Standards and limits:** B. **Control of Volatile Organic Compounds** COMAR 26.11.19.30E – General Requirements for FPM Process Installations. (1) "A person who owns or operates an FPM installation that has actual uncontrolled VOC emissions of 50 pounds or more per day shall vent the emissions into a thermal oxidizer system or other control method approved by the Department to destroy or reduce VOC emissions by 85 percent or more, overall. (2) If a thermal oxidizer is installed, the oxidizer combustion chamber shall be: (a) Operated at a minimum combustion chamber temperature of 1400 °F or other temperature approved by the Department that is demonstrated to achieve compliance with this regulation; (b) Equipped with a continuous temperature monitor to record the oxidizer temperature; and (c) Equipped with an alarm system that alerts the operator when the oxidizer combustion chamber temperature is less than the approved temperature; and (d) Equipped with an interlock system that prevents operation of the FPM installation unless the approved control system is operating. (3) If a source uses an alternative control method approved by the Department, the alternative control method shall be monitored as required by the Department. (4) Equipment that is installed for the purpose of treating emissions or monitoring shall be operated, maintained, and as applicable, calibrated in accordance with the equipment vendor's specifications. (5) A person who owns or operates an FPM compounding and tape or shape-forming installation shall minimize fugitive emissions of VOC by: (a) Immediately enclosing all wet FPM during storage; and (b) Covering dipping troughs when not in operation. (6) A person who owns or operates an FPM coating installation that has actual uncontrolled VOC emissions of 20 pounds or more per day may not use a coating that has a VOC content exceeding 2.9 pounds per gallon unless the installation is equipped with a control device that meets the requirements in E (2), (3), and (4) of this regulation." EU 3-1: Natural FPM Product Area vented through the oxidizer control system EU 3-2: Filled FPM Products Area vented through the oxidizer control system EU 3-3: FPM Processing Area vented to atmosphere EU 3-4: Ovens vented to Oxidizer control system Please Note: The oxidizer control system includes the following oxidizers: SARA (oxidizer #1), T-Ox (oxidizer #2) and WILLIE (oxidizer #3).	EU 3-1: Natural FPM Production Area EU 3-2: Filled FPM Processing Area EU 3-3: FPM Processing Area E 3-4: Ovens	___ Intermittent Compliance _X_ Continuous Compliance

D14. METHODS USED TO DETERMINE COMPLIANCE

Describe all methods of means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

METHODS USED TO DETERMINE COMPLIANCE	Compliance status during reporting period
Testing Requirements: B. Conduct performance testing of the primary oxidizer in the control system once during the 5-year term of the permit. Submit a test protocol to the Department for approval at least 30 days prior to proposed date of the test. *Stack testing was performed on the two lead oxidizers ("Willie" and "Sara") to the Oxidizer Control System in May 2016. EPA Reference Methods used included: Reference Methods 1-4, and 25A. The stack test report was submitted to the MDE and showed an average destruction efficiency of 96.09% for "Willie" oxidizer and 99.34% for "Sara" oxidizer. A protocol was submitted to MDE within 30 days prior to the test date, and the final report was submitted within 45 days following the test date. Testing is required once during the term of this permit to determine destruction efficiency for VOC.*	___ Intermittent Compliance _X_ Continuous Compliance
Monitoring Requirements: *B. For the oxidizer control system, the combustion chamber is:* *(a) Operated at a minimum combustion chamber temperature of 1410°F for Willie oxidizer and 1250°F for Sara oxidizer. These minimum temperatures were approved by the Department because the oxidizers at these temperatures were demonstrated to achieve*	___ Intermittent Compliance _X_ Continuous Compliance

compliance with this regulation. *(b) Equipped with a continuous temperature monitor to record the oxidizer temperature;* *(c) Equipped with an alarm system that alerts the operator when the oxidizer combustion chamber temperature is below 1410°F for Willie and 1250°F for Sara; and* *(d) Equipped with an interlock system that prevents operation of the FPM installation unless the control system is operating."* **[Reference: COMAR 26.11.19.30E(2)].** *Thermocouples that monitor the temperatures to the oxidizer control system are replaced semi-annually.* **[Reference: COMAR 26.11.03.06C].**	
Record Keeping Requirements: B *The following records are kept on site and are available to the Department upon request:* *(1) Permanent records, for the life of the equipment, of pertinent design data for the control device including manufacturer specifications and/or vendor guarantees for the control device;* *(2) Maintenance records of types and dates of work performed on the oxidizer control system;* *(3) Records of the combustion chamber temperature, and* *(4) Records of the results of destruction efficiency tests.* *(5) Records of the damper position and corresponding chamber temperature are kept on site for at least five years.* **(6)** *Records of semi-annual replacement of the thermocouples onsite for at least five years. Thermocouples are changed in accordance with the semi-annual electrical preventive maintenance plan.* **[Reference: COMAR 26.11.03.06C]**	___ Intermittent Compliance _X_ Continuous Compliance
Reporting Requirements: *B. Stack testing was performed on the two lead oxidizers ("Willie" and "Sara") to the Oxidizer Control System in May 2016. EPA Reference Methods used included: Reference Methods 1-4, and 25A. The stack test report was submitted to MDE and showed an average destruction efficiency of 96.09% for "Willie" oxidizer and 99.34% for "Sara" oxidizer. A protocol was submitted to MDE within 30 days prior to the test date, and the final report was submitted within 45 days following the test date.* *Records of the thermocouple replacement are available to the Department upon request.* **[Reference: COMAR 26.11.03.06C]** *Monthly premise-wide emissions are available on-site, upon request.*	___ Intermittent Compliance _X_ Continuous Compliance

E. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

The table below is appropriate for reporting deviations from permit terms or conditions that have been previously reported in a six-month monitoring report (assuming that the most recent six-month monitoring report and the annual compliance certification both end on the same date). Copy this page as many times as necessary to include all such deviations. Note that you may cross-reference deviations already reported in the six-month report in the first column of the table, and leave the other columns blank, however such cross-reference must be clear and unambiguous with respect to the six-month monitoring report and the individual deviation being cross-referenced. In addition, in the first column, whether you cross-reference deviations or not, you must indicate whether each deviation is a "possible exception to compliance." If a deviation is not a possible exception to compliance, please briefly explain why it is allowed by the permit and cite the relevant permit term that provides the excuse. In addition, if there are deviations that have never been reported in writing to the permitting authority, more information than required by this table will be needed. In such cases, you must include information consistent with Section D of the six-moth monitoring report form, and indicate whether it is a "possible exception to compliance."

Permit Term for Which There is a Deviation & Whether the Deviation is a "Possible Exception to Compliance"	Emissions Units (unit IDs)	Deviation Time Periods Date (mo/dy/year) Time (hr/min) Time Zone	Written Deviation Report Submittal Date (mo/dy/year)
Previously reported on SIXMON 1/1/2016 - 6/30/2016, Section E, Deviation #1 Table IV-4 pg 52, Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use. [Reference: COMAR 26.11.19.02I(2)(b)(ii)]		Beginning 02/25/2016 09:45 EST Ending 02/25/2016 10:00 EST	07/18/2016
Previously reported on SIXMON 1/1/2016 - 6/30/2016, Section E, Deviation #2 Table IV-5 pg 57, COMAR 26.11.06.02C(1) – Visible emission standards. "A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is greater than 20% opacity."		Beginning 01/15/2016 14:30 EST Ending 01/15/2016 14:40 EST	07/18/2016
Previously reported on SIXMON 1/1/2016 - 6/30/2016, Section E, Deviation #3 Table IV-1 pg 35, COMAR 26.11.06.02C(1) – Visible emission standards. "A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is greater than 20% opacity."		Beginning 5/17/2016 13:45 EST Ending 5/17/2016 13:50 EST	07/18/2016
Previously reported on SIXMON 7/1/2016 - 12/30/2016, Section E, Deviation #1 Table IV-4 pg 52, Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use. [Reference: COMAR 26.11.19.02I(2)(b)(ii)]		Beginning 07/05/2016 07:00 EST Ending 07/05/2016 07:00 EST	01/30/2017
Previously reported on SIXMON 7/1/2016 - 12/30/2016, Section E, Deviation #2 Table IV-4 pg 52, Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use. [Reference: COMAR 26.11.19.02I(2)(b)(ii)]		Beginning 12/11/2016 11:30 EST Ending 12/11/2016 11:45 EST	01/30/2017
		Beginning _____ _____ EST Ending _____ _____ EST	

CERTIFICATION OF PLANT-WIDE CONDITIONS

(Section III of Part 70 Operating Permit)

Indicated compliance with the following requirements of Section III of your Part 70 Operating Permit in the space provided below:

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.

COMPLIANCE STATUS:
Continuous Compliance.

2. **OPEN BURNING** [COMAR 26.11.07]

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

COMPLIANCE STATUS:
Continuous Compliance.
Open burning was not conducted at this site during the reporting period.

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.

COMPLIANCE STATUS:
Continuous Compliance.
This was not requested by the Department during this reporting period.

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 the State-only enforceable section:

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 attributable 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 must include the cause, dates and times of the onset and termination of the deviation, as well as the action planned or taken to reduce, eliminate, and prevent the 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 26.11.01.07C(2).

COMPLIANCE STATUS:
Continuous Compliance.
The Facility submitted timely and complete Semi-annual monitoring reports (SIXMON).

5. **ACCIDENTAL RELEASE PROVISIONS** [COMAR 26.11.03.03B(23)] and [40 CFR Part 68]

Should the Permittee, as defined in 40 CFR Part 68.3, become subject to 40 CFR Part 68 during the term of this permit, the owner or operator shall submit a risk management plan by the date specified in 40 CFR Part 68.10 and shall certify compliance with the requirements of 40 CFR Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

COMPLIANCE STATUS:
Continuous Compliance.
The Facility was not subject to this requirement during the reporting period.

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 will be provided to the Department.

COMPLIANCE STATUS:
Continuous Compliance.
The Department did not require testing during this reporting period.

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 Part 60, appendix A
b. 40 CFR Part 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 2, (July 1, 1992)

COMPLIANCE STATUS:
Continuous Compliance
Stack testing was performed on the two lead oxidizers ("Willie" and "Sara") to the Oxidizer Control System in May 2016. EPA Reference Methods used included: Reference Methods 1-4, and 25A. The stack test report was submitted to MDE and showed an average destruction efficiency of 96.09% for "Willie" oxidizer and 99.34% for "Sara" oxidizer. A protocol was submitted to MDE within 30 days prior to the test date, and the final report was submitted within 45 days following the test date. Testing is required once during the term of this permit to determine destruction efficiency for VOC.

8. **EMISSIONS CERTIFICATION REPORT** [COMAR 26.11.01.05-1], [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 a form 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 certification form is submitted, and
   (2) Responsible for the accuracy of the emission information; and

c. The Permittee shall maintain records necessary to support the emission 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) Emission data from continuous emission 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 the 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.

COMPLIANCE STATUS:
Continuous Compliance.
The Facility submitted a timely and complete Emission Certification report.

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, emission 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 conditions 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 the 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.

COMPLIANCE STATUS:
Continuous Compliance.
The Facility submitted a timely and complete Compliance Certification Report.

10. CERTIFICATION BY RESPONSIBLE OFFICIAL [COMAR 26.11.02.02F]

All application forms, reports, and compliance certifications submitted pursuant 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."

COMPLIANCE STATUS:
Continuous Compliance.

All reports requiring certification were certified by the Plant Leader.

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
e. The results of each analysis.

COMPLIANCE STATUS:
Continuous Compliance.
Stack testing was performed on the two lead oxidizers ("Willie" and "Sara") to the Oxidizer Control System in May 2016. EPA Reference Methods used included: Reference Methods 1-4, and 25A. The stack test report was submitted to MDE and showed an average destruction efficiency of 96.09% for "Willie" oxidizer and 99.34% for "Sara" oxidizer. A protocol was submitted to MDE within 30 days prior to the test date, and the final report was submitted within 45 days following the test date. Testing is required once during the term of this permit to determine destruction efficiency for VOC.

12. GENERAL RECORDKEEPING [COMAR 26.11.03.06C(6)]

The Permittee shall retain records of all monitoring data and support information that supports the compliance certification for a period of five 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 strip-chart recordings for continuous monitoring instrumentation;
c. Records which support the annual emissions certification; and
b. Copies of all reports required by this permit.

COMPLIANCE STATUS:
Continuous Compliance.
All records required by the Title V Permit to Operate are being maintained as required.

13. GENERAL CONFORMITY (N/A except for federal facilities)[COMAR 26.11.26.09]

The Permittee shall comply with the general conformity requirements of 40 CFR Part 93, Subpart B and COMAR 26.11.26.03.

COMPLIANCE STATUS:
N/A
This is not a federal facility and therefore does not apply.

14. ASBESTOS PROVISIONS [40 CFR Part 61, Subpart M]

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

COMPLIANCE STATUS:
Continuous Compliance.
To the best of our knowledge, there are no asbestos containing materials at this Facility.

15. OZONE DEPLETING REGULATIONS [40 CFR Part 82, Subpart F]

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

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

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

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

d. Persons performing maintenance, service, repairs or disposal of appliances must certify with the Administrator pursuant to §82.162.

e. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in §82.152, must comply with recordkeeping requirements pursuant to §82.166.

f. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.

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

COMPLIANCE STATUS:
Continuous Compliance.
All applicable equipment is maintained and serviced by properly certified technicians. Refrigerant logs are maintained for each unit of 50 lbs in accordance with the regulations.

16. ACID RAIN PERMIT

Not Applicable