KEEP PERMIT AT SITE

CONTROL NO. B - 06385

State of Maryland

Lawrence J. Hogan, Jr.
Governor

Boyd K. Rutherford
Lieutenant Governor

Ben Grumbles
Secretary

DEPARTMENT OF THE ENVIRONMENT

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

[ ] Construction Permit

[X] Part 70 Operating Permit

PERMIT NO. 24-005-1484

DATE ISSUED JUL - 6 2018

PERMIT FEE To be paid in accordance with COMAR 26.11.02.19B

EXPIRATION DATE August 31, 2021

LEGAL OWNER & ADDRESS
Holcim (US), Inc.
8700 W. Bryn Mawr Avenue, Suite 300N
Chicago, IL 60631
Attn: Mr. Marcelo Cisternino
2001 Wharf Road
Sparrows Point, MD 21219

SITE
Lafarge Building Materials, Inc.
Sparrows Point Facility
950 Wharf Rd, Gate 15B
Sparrows Point, MD 21219
Baltimore County
AI#3830

SOURCE DESCRIPTION

Slag Processing Plant including a slag grinding and drying area and a slag slipping area. This permit is amended to change the ownership of the facility to Holcim (US), Inc. The facility name will remain Lafarge Building Materials, Inc.

This permit supersedes the Part 70 Operating Permit No. 24-005-1484 issued on September 1, 2016.

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

Program Manager

Director, Air & Radiation Administration

(NOT TRANSFERABLE)

LAFARGE BUILDING MATERIALS, INC. – SPARROWS POINT FACILITY
2001 WHARF ROAD
BALTIMORE, MARYLAND 21219
PART 70 OPERATING PERMIT NO. 24-005-1484

SECTION I SOURCE IDENTIFICATION

1. DESCRIPTION OF FACILITY

The Lafarge Building Materials, Inc. – Sparrows Point Facility (Lafarge/Permittee), owned by Holcim (US), Inc., processes slag to produce slag cement that is sold to concrete manufacturers for use as an additive. The Sparrows Point Facility is located at 2001 Wharf Road, in Sparrows Point, Maryland, Baltimore County, Area III (as defined in COMAR 26.11.01.03). The primary SIC code for this facility is 3295.

The facility is divided into two distinct operations – slag grinding and slag shipping. Each operational area is described below.

- **Slag Grinding (ARA Registration No. 005-1484-6-2676)** – Raw slag is received at the facility by truck, rail, and barge. The grinding operation consists of raw slag stockpiles, crusher, conveying systems, slag silos, slag dryer, grinding, mills, and finished slag cement silos. Trucks deposit raw material onto one of two raw slag stockpiles, and conveyors and front end loaders are used to transfer the raw slag from the piles to the raw slag silos. Raw slag is wet granulated slag, which has a typical moisture content of 8-13%. A small crusher is used to break larger pieces of consolidated raw slag typically taken from the auxiliary slag storage pile. A fluid bed dryer, with an attached baghouse, is used to produce dry slag. The dry slag is then mixed with additional raw slag and ground in one of two finish mills to produce slag cement. The finished product is then stored in one of two storage silos.

- **Slag Shipping (ARA Registration No. 005-1484-6-2677)** – A truck and truck/railcar loadout station exists next to the product silos. A truck or railcar may be loaded simultaneously or two trucks may be loaded simultaneously. Barge loading operations are also present at the facility. The slag cement is conveyed via airslides from the product silos onto a belt conveyor that extends to the barge loading area. The product travels to two airslides and loadout nozzles, which are simultaneously used to fill each compartment of the barge.

2. FACILITY INVENTORY LIST

ARA Registration Number	Emissions Unit Number	Emissions Unit Name and Description	Date of Installation
Slag Grinding and Drying Area			
005-1484-6-2676	EU70-01*	Raw Slag Hauling	1980, modified 2001, 2002
	EU70-02*	Raw Slag Unloading	
	EU70-03*	Raw Slag Conveyors	
	EU70-04*	Raw Slag Stockpile	
	EU70-05*	Raw Slag Silo Conveyors	
	EU70-06*	Auxiliary Slag Stockpile	
	EU70-07*	Auxiliary Slag Unloading	
	EU70-08*	Auxiliary Slag Crusher	
	EU70-09*	Raw Slag Silo	
	EU70-10*	Raw Slag Conveyors	
	EU70-11*	Raw Slag Feeder	
	EU70-12	Fluid Bed Slag Dryer, fired by natural gas, propane gas, used oil, and waste combustible fluid (WCF) – Baghouse DC405	
	EU70-13	Propane Vaporizer	
	EU70-14	Dry Slag Silo Conveyors – Baghouse DC510B	
	EU70-15	Dry Slag Silo ‘A’ – Baghouse DC510A	
	EU70-16	Dry Slag Silo ‘B’ – Baghouse DC510B	
	EU70-17*	Railcar Unloading	
	EU70-18*	Radial Stacker	
	EU70-19*	Raw Material Stockpile	
	EU70-20*	Raw Material Conveyor	
	EU70-21*	Raw Material Unloading	
	EU70-22*	Raw Material Conveyors and Hoppers	
	EU70-23*	Raw Material Conveying System	
	EU70-24*	Raw Material Silo Conveying System	
	EU70-25*	Silo	
	EU70-26*	Raw Slag Silo	
	EU70-27*	Finish Mill ‘A’ Conveyors	
	EU70-28*	Finish Mill ‘B’ Conveyors	
	EU70-29	Finish Mill ‘A’ System – Baghouse DC602A	
	EU70-30	Finish Mill ‘B’ System – Baghouse DC602B	
	EU70-31*	Iron Tailings Conveyors	
	EU70-32*	Iron Tailings Storage	
	EU70-33	Separator ‘A’ – Baghouse DC608A	
	EU70-34	Separator ‘B’ – Baghouse DC608B	
	EU70-37	Product Storage Silos Conveying System – Baghouse DC649	

ARA Registration Number	Emissions Unit Number	Emissions Unit Name and Description	Date of Installation
	EU70-38	Product Storage Silo 'A' – Baghouse DC645A	
005-1484-6-2676	EU70-39	Product Storage Silo 'B' – Baghouse DC645B	1980, modified 2001, 2002
Slag Shipping Area			
005-1484-6-2677	EU90-01	Airslide 'A' – Bin vent BV826	1980, modified 2001, 2002
	EU90-02	Airslide 'B' – Bin vent BV829	
	EU90-03	Truck Loading – Baghouse DC820	
	EU90-04	Truck/Railcar Loading – Baghouse DC834	
	EU90-05	Silo 'A' Airslide and Screen – Baghouse DC713A	
	EU90-06	Silo 'B' Airslide and Screen – Baghouse DC713B	
	EU90-07*	Barge Loading Conveyor System	
	EU90-08	Barge Loading Head Pulley – Baghouse DC720	
	EU90-09	Barge Loading Slide (inboard) – Baghouse DC721	
	EU90-10	Barge Loading Slide (outboard) – Baghouse DC722	
	EU90-11*	Paved Haul Roads	
	EU90-12	Barge Loading Tail Pulley – Baghouse DC714A	

* Denotes unconfined source. All remaining units are point sources.

SECTION II GENERAL CONDITIONS

1. DEFINITIONS

[COMAR 26.11.01.01] and [COMAR 26.11.02.01]

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

2. ACRONYMS

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

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

3. EFFECTIVE DATE

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

4. PERMIT EXPIRATION

[COMAR 26.11.03.13B(2)]

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

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

5. PERMIT RENEWAL

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

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

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

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

6. CONFIDENTIAL INFORMATION

[COMAR 26.11.02.02G]

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

7. PERMIT ACTIONS

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

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

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

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

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

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

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

8. PERMIT AVAILABILITY

[COMAR 26.11.02.13G]

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

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

[COMAR 26.11.03.20B]

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

10. TRANSFER OF PERMIT

[COMAR 26.11.02.02E]

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

11. REVISION OF PART 70 PERMITS – GENERAL CONDITIONS

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

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

b. When applying for a revision to a Part 70 permit, the Permittee shall comply with the requirements of COMAR 26.11.03.02 and .03 except that the application for a revision need include only information listed

that is related to the proposed change to the source and revision to the permit. This information shall be sufficient to evaluate the proposed change and to determine whether it will comply with all applicable requirements of the Clean Air Act.

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

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

12. SIGNIFICANT PART 70 OPERATING PERMIT MODIFICATIONS

[COMAR 26.11.03.17]

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

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

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

c. Significant permit modifications are subject to all requirements of COMAR 26.11.03 as they apply to permit issuance and renewal, including the requirements for applications, public participation, and review by affected states and EPA, except:

(1) An application need include only information pertaining to the proposed change to the source and modification of this permit, including a description of the change and modification, and any

new applicable requirements of the Clean Air Act that will apply if the change occurs;

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

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

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

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

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

13. MINOR PERMIT MODIFICATIONS

[COMAR 26.11.03.16]

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

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

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

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

(a) Adding new requirements,

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

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

(3) Does not require or modify a:

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

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

(c) Visibility or increment analysis;

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

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

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

(5) Is not a Title I modification; and

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

b. Application for a Minor Permit Modification

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

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

(2) The proposed minor permit modification;

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

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

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

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

c. Permittee's Ability to Make Change

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

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

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

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

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

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

14. ADMINISTRATIVE PART 70 OPERATING PERMIT AMENDMENTS

[COMAR 26.11.03.15]

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

a. An application for an administrative permit amendment shall:

(1) Be in writing;

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

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

b. An administrative permit amendment:

(1) Is a correction of a typographical error;

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

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

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

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

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

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

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

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

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

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

15. OFF-PERMIT CHANGES TO THIS SOURCE

[COMAR 26.11.03.19]

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

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

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

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

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

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

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

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

d. The Permittee shall keep a record describing:

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

(2) The emissions resulting from those changes.

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

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

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

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

16. ON-PERMIT CHANGES TO SOURCES

[COMAR 26.11.03.18]

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

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

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

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

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

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

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

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

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

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

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

(1) A description of the proposed change;

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

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

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

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

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

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

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

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

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

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

17. FEE PAYMENT

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

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

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

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

18. REQUIREMENTS FOR PERMITS-TO-CONSTRUCT AND APPROVALS

[COMAR 26.11.02.09.]

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

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

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

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

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

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

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

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

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

19. CONSOLIDATION OF PROCEDURES FOR PUBLIC PARTICIPATION

[COMAR 26.11.02.11C] and [COMAR 26.11.03.01K]

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

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

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

20. PROPERTY RIGHTS

[COMAR 26.11.03.06E(4)]

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

21. SEVERABILITY

[COMAR 26.11.03.06A(5)]

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

22. INSPECTION AND ENTRY

[COMAR 26.11.03.06G(3)]

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

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

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

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

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

23. DUTY TO PROVIDE INFORMATION

[COMAR 26.11.03.06E(5)]

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

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

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

24. COMPLIANCE REQUIREMENTS

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

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

a. Enforcement action,

b. Permit revocation or revision,

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

d. Any combination of these actions.

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

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

25. CREDIBLE EVIDENCE

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

26. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE

[COMAR 26.11.03.06E(2)]

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

27. CIRCUMVENTION

[COMAR 26.11.01.06]

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

28. PERMIT SHIELD

[COMAR 26.11.03.23]

A permit shield as described in COMAR 26.11.03.23 shall apply only to terms and conditions in this Part 70 permit that have been specifically identified as covered by the permit shield. This permit nor COMAR 26.11.03.23 alters the following:

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

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

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

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

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

29. ALTERNATE OPERATING SCENARIOS

[COMAR 26.11.03.06A(9)]

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

SECTION III PLANT WIDE CONDITIONS

1. PARTICULATE MATTER FROM CONSTRUCTION AND DEMOLITION

[COMAR 26.11.06.03D]

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

2. OPEN BURNING

[COMAR 26.11.07]

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

3. AIR POLLUTION EPISODE

[COMAR 26.11.05.04]

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

4. REPORT OF EXCESS EMISSIONS AND DEVIATIONS

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

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

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

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

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

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

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

5. ACCIDENTAL RELEASE PROVISIONS

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

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

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

6. GENERAL TESTING REQUIREMENTS

[COMAR 26.11.01.04]

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

7. EMISSIONS TEST METHODS

[COMAR 26.11.01.04]

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

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

a. 40 CFR 60, appendix A

b. 40 CFR 51, appendix M

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

8. EMISSIONS CERTIFICATION REPORT

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

9. COMPLIANCE CERTIFICATION REPORT

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

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

a. The compliance certification shall include:

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

(2) The compliance status;

(3) Whether the compliance was continuous or intermittent;

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

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

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

10. CERTIFICATION BY RESPONSIBLE OFFICIAL

[COMAR 26.11.02.02F]

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

The certification shall be in the following form:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system

designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

11. SAMPLING AND EMISSIONS TESTING RECORD KEEPING

[COMAR 26.11.03.06C(5)]

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

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

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

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

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

e. The analytical techniques and methods used; and

f. The results of each analysis.

12. GENERAL RECORDKEEPING

[COMAR 26.11.03.06C(6)]

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

These records and support information shall include:

a. All calibration and maintenance records;

b. All original data collected from continuous monitoring instrumentation;

c. Records which support the annual emissions certification; and

d. Copies of all reports required by this permit.

13. GENERAL CONFORMITY

[COMAR 26.11.26.09]

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

14. ASBESTOS PROVISIONS

[40 CFR 61, Subpart M]

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

15. OZONE DEPLETING REGULATIONS

[40 CFR 82, Subpart F]

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

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

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

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

d. Persons performing maintenance, service, repairs or disposal of appliances shall certify with the Administrator pursuant to 40 CFR 82.162.

e. Persons disposing of small appliances, MVACS, and MVAC-like appliances as defined in 40 CFR 82.152, shall comply with record keeping requirements pursuant to 40 CFR 82.166.

f. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.

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

16. ACID RAIN PERMIT

Not applicable

SECTION IV PLANT SPECIFIC CONDITIONS

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

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

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

Table IV – 1	
1.0	**Emissions Unit Numbers: EU70-01 through EU70-34 and EU70-37 though EU70-39** **Slag Grinding and Drying** **ARA Registration No. 005-1484-6-2676**
1.1	**Applicable Standards/Limits:** A. Control of Particulate 1. COMAR 26.11.10.04A, which limits confined particulate matter emissions to 0.03 grains per standard cubic foot of dry exhaust gas (0.03 gr/scfd). Compliance with the requirement listed in 3 below demonstrates compliance with this requirement. 2. COMAR 26.11.10.04B(1), which prohibits the discharge of fugitive (unconfined) emissions of particulate matter from any iron and steel production installation unless reasonable control methods are employed to minimize emissions. These methods include the use of hoods and control equipment to capture emissions, other control techniques, and process restrictions. 3. Particulate matter emissions (as PM-10) from each particulate matter emission point source shall not exceed 0.02 gr/scfd unless the Permittee can demonstrate, to the satisfaction of the

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Department, that:

(a) the particulate matter emissions (as PM-10) from each particulate matter emissions point source does not exceed 0.03 gr/scfd; and

(b) the total premises-wide particulate matter emissions (as PM-10), on a potential and actual basis, are less than 250 tons per year.

[Authority: ARA Permit to Construct No. 005-1484-6-2675M, 6-2676M and 6-2677M issued October 10, 2002.]

4. Operational Limitation - In order to meet the confined particulate matter emission requirements of COMAR 26.11.10.04A, the exhaust gases from each of the following emission point sources shall vent through a baghouse prior to discharging to the atmosphere:

(a) Fluid Bed Dryer (EU70-12);
(b) Dry Slag Silo Conveyors (EU70-14);
(c) Dry Slag Silo 'A' (EU70-15);
(e) Dry Slag Silo 'B' (EU70-16);
(f) Finish Mill 'A' System (EU70-29);
(g) Finish Mill 'B' System (EU70-30);
(h) Separator 'A' (EU70-33);
(i) Separator 'B' (EU70-34);
(j) Product Storage Silos Conveying System (EU70-37);
(k) Product Storage Silo 'A' (EU70-38); and
(l) Product Storage Silo 'B' (EU70-39).

[Authority: ARA Permit to Construct No. 005-1484-6-2675M, 6-2676M and 6-2677M issued October 10, 2002.]

B. Visible Emissions Limitations

1. For EU70-13 only, COMAR 26.11.09.05A, which prohibits emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity.

Exceptions: Section A of this regulation does not apply to emissions

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during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period.

2. COMAR 26.11.10.03A(1), which prohibits visible emissions other than water vapor in an uncombined form.

Exceptions: COMAR 26.11.10.03A(2)(e) - Section A(1) does not apply to "Confined emissions resulting from the building of new fires, the cleaning of fires, soot-blowing, start-ups, process modifications or adjustments, and occasional cleaning of control equipment and which are not greater than 40 percent opacity for one 6-minute period in any 60 minutes."

C. Control of Sulfur Oxides

Operational Limitation - The Permittee may only burn the following types of fuels, individually or in any combination, in the fluid bed dryer (EU70-12) unless the Permittee applies for and receives an approval or permit from the Department to burn alternate fuels:
[Authority: ARA Permit to Construct No. 005-1484-6-2675M, 6-2676M and 6-2677M issued October 10, 2002.]

(a) Natural gas;
(b) Propane gas;
(c) On-specification used oil as defined in COMAR 26.11.09.01B(4-2);
(d) Off-specification used oil as defined in COMAR 26.11.09.01B(4-1); and
(e) Waste combustible fluid (WCF) as defined in COMAR 26.11.09.01B(10).

D. Control of Nitrogen Oxides

If used oil is burned, the Permittee shall quantify the NOx emissions from the fluid bed dryer (EU70-12).
[Authority: COMAR 26.11.03.06C]

E. Control of VOC

COMAR 26.11.10.06A(1), which limits VOC emissions from iron and

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	steel production installations to 20 pounds per day.
1. **2**	**<u>Testing Requirements</u>:** A. <u>Control of Particulate</u> No later than 12 months prior to the expiration date of this permit, the Permittee shall conduct emissions tests on the following emission points associated with the Slag Grinding and Drying Area (ARA Registration No. 005-1484-6-2676) in order to demonstrate compliance with the 0.02 gr/scfd PM-10 point source emissions limit: (a) The Fluid Bed Dryer baghouse emission point (EU70-12); and (b) The Separator 'A' baghouse emission point (EU70-33) and the Finish Mill 'A' System baghouse emission point (EU70-29); or (c) The Separator 'B' baghouse emission point (EU70-34) and the Finish Mill 'B' System baghouse emission point (EU70-30) for the terms of the permit. The tests shall be conducted in accordance with the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources" (January 1991) and EPA Method 201 and Method 202 outlined in the Code of Federal Regulations (CFR), 40 CFR, Part 60, Appendix A. **[Authority: COMAR 26.11.03.06C]** B. <u>Visible Emissions Limitations</u> See Monitoring, Record Keeping, and Reporting Requirements. C. <u>Control of Sulfur Oxides</u> See Record Keeping and Reporting Requirements. D. <u>Control of Nitrogen Oxides</u> If used oil is burned, at least once during the term of this permit, the Permittee shall conduct an emissions test on the fluid bed dryer (EU70-12) to determine total NO_X emissions from the source and to establish an emission factor that will be used to estimate NO_X emissions for annual emission certification reporting purposes.

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	The test shall be conducted in accordance with the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources" (January 1991) and EPA Method 7 as outlined in the Code of Federal Regulations (CFR), 40 CFR, Part 60, Appendix A. **[Authority: COMAR 26.11.03.06C]** E. Control of VOC See Reporting Requirements.
1.3	**Monitoring Requirements:** A. Control of Particulate 1. The Permittee shall maintain a written Fugitive Dust Control Plan which describes the reasonable control methods used to control dust from all fugitive dust sources at the facility, including truck and railcar loading operations, roads and stockpiles. The Fugitive Dust Control Plan shall be reviewed and updated at least once during the term of this permit **[Authority: COMAR 26.11.03.06C]**. 2. The Permittee shall perform a visual inspection for a minimum of one (1) minute once per month, when weather conditions are favorable to create airborne particulate matter, to verify that the methods outlined in the Fugitive Dust Control Plan are being implemented. **[Authority: COMAR 26.11.03.06C]** 3. The Permittee shall maintain a Dust Collector Operations and Maintenance plan that describes the maintenance activity and time schedule for completing each activity for each baghouse in EU70. The Permittee shall perform maintenance activities within the time frames established in the plan. **[Authority: COMAR 26.11.03.06]** B. Visible Emissions Limitations The Permittee shall conduct a visible emission observation for

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	each of the emission units in EU70 at least once per month, except emission units EU70-12, 29, 30, 33, and 34, for which visible emissions observations shall be conducted at least once per day. Each observation shall be for a 6-minute period and the Permittee shall record the results of each observation. If emissions in the exhaust gases are visible, the Permittee shall perform the following: (a) Inspect all process and/or control equipment that may affect visible emissions; (b) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated; (c) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control equipment; and (d) If visible emissions have not been eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. **[Authority: COMAR 26.11.03.06C]** C. Control of Sulfur Oxides See Record Keeping and Reporting Requirements. D. Control of Nitrogen Oxides See Testing, Record Keeping, and Reporting Requirements. E. Control of VOC See Reporting Requirements.
1.4	**Record Keeping Requirements:** A. Control of Particulate 1. The Permittee shall maintain the Fugitive Dust Control Plan and all updates to the plan and records of the visual inspections on-site for

Table IV – 1	
	at least five (5) years and shall make them available to the Department upon request. **[Authority: COMAR 26.11.03.06C]** 2. The Permittee shall keep all stack test protocols and stack test results on-site for at least five (5) years. **[Authority: COMAR 26.11.03.06C]** 3. The Permittee shall also maintain a log with records of the dates and description of the maintenance that was performed on each baghouse. The Dust Collector Operations and Maintenance Plan and maintenance log shall be kept on-site for at least five (5) years. **[Authority: COMAR 26.11.03.06C]** 4. The Permittee shall keep records on site for at least five (5) years of the calculated annual PM-10 emissions (in tons) and shall make the records available to the Department upon request. **[Authority: COMAR 26.11.03.06C]** B. Visible Emissions Limitations The Permittee shall maintain a log of visible emissions observations performed for each emission point, including the location, date and results of each observation. The logs shall be kept on site for at least five (5) years and shall be made available to the Department upon request. **[Authority: COMAR 26.11.03.06C]** C. Control of Sulfur Oxides The Permittee shall keep annual records of the types and amounts of fuels burned in EU70-12. **[Authority: COMAR 26.11.03.06C]** D. Control of Nitrogen Oxides The Permittee shall keep all stack test protocols and stack test results on-site for at least five (5) years. **[Authority: COMAR 26.11.03.06C]** E. Control of VOC See Reporting Requirements.
1.5	**Reporting Requirements:** A. Control of Particulate

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1. The Permittee shall maintain a Fugitive Dust Control Plan. Any updates to the Fugitive Dust Control Plan shall be submitted to the Department upon request **[Authority: COMAR 26.11.03.06C]**.
2. At least 30 days before the stack emission tests are conducted, the Permittee shall submit to the Department a test protocol for review and approval. The protocol shall be prepared in accordance with the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources" (January 1991) and shall also describe all equipment operating conditions that will be maintained during the tests.

   Within 60 days after the stack emission tests, the Permittee shall submit to the Department the stack test results. **[Authority: COMAR 26.11.03.06C]**

3. The Permittee shall make the dust collector operations and maintenance log available to the Department upon request. **[Authority: COMAR 26.11.03.06C]**

B. Visible Emissions Limitations

The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". **[Authority: COMAR 26.11.03.06C]**

C. Control of Sulfur Oxides

The Permittee shall submit fuel usage records to the Department upon request. **[Authority: COMAR 26.11.03.06C]**

D. Control of Nitrogen Oxides

1. At least 30 days before the stack emission tests are conducted, the Permittee shall submit to the Department a test protocol for review and approval. The protocol shall be prepared in accordance with the Department's Technical Memorandum 91-01, "Test Methods and Equipment Specifications for Stationary Sources" (January 1991) and shall also describe all equipment operating conditions that will be maintained during the tests.

2. Within 60 days after the stack emission tests, the Permittee shall submit to the Department the stack test results.

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	3. The Permittee shall submit NO_X emissions calculations with the annual emissions certification report. **[Authority: COMAR 26.11.02.19C and D and COMAR 26.11.03.06C]** E. Control of VOC The Permittee shall submit VOC emissions calculations with the annual emissions certification report. **[Authority: COMAR 26.11.02.19C and D]**

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

Compliance Assurance Monitoring (CAM) Plan for the following emission units:

1. Fluid Bed Dryer (EU70-12) – Controlled by baghouse DC405;

2. Finish Mill 'A' System (EU70-29) – Controlled by baghouse DC602A;

3. Finish Mill 'B' System (EU70-30) – Controlled by baghouse DC602B;

4. Separator 'A' (EU70-33) – Controlled by baghouse DC608A; and

5. Separator 'B' (EU70-34) – Controlled by baghouse DC608B.

Part 64 Requirement	**CAM Plan**			
A.	**Indicator No. 1**	**Indicator No. 2**	**Indicator No. 3**	**Indicator No. 4**
Indicator 64.4(a)(1)	**Pressure Drop (ΔP; does not include Dryer)**	**Bag Leak Detector**	**Visible Emissions Monitoring**	**Reference Test Methods**
Measurement Approach	Pressure drop through the baghouse is measured continuously using a differential pressure gauge	Bag leak is detected continuously with alarms sounding	Visible emissions monitoring that triggers inspection and maintenance when visible emissions are observed	Reference testing using Methods 201A, 1, 2, 3a, 4 and 5
B. **Indicator Range(s)**	ΔP at 4" H_2O (triggers pulse	Alarms sounding	No visible emissions	Particulate Matter (PM10)

Part 64 Requirement	**CAM Plan**			
A. Indicator 64.4(a)(1)	**Indicator No. 1**	**Indicator No. 2**	**Indicator No. 3**	**Indicator No. 4**
	Pressure Drop (ΔP; does not include Dryer)	**Bag Leak Detector**	**Visible Emissions Monitoring**	**Reference Test Methods**
64.4(a)(2)	cleaning) Normal range: 2" to 8" H_2O			≤ 0.02 gr/dscf
C. Performance Criteria 64.4(a)(3) (1) Data Representativeness	ΔP across the baghouse is measured at the baghouse inlet and exhaust. The minimum accuracy of the device is ± 0.5" H_2O	Bag leak detector measured on clean side of bags, prior to discharging to atmosphere	Visible emissions and inspections are performed at the baghouse	Test sampling done at the exhaust of the baghouse.
(2) Verification of Operational Status	Indicator Gauge	Indicator Gauge	Operation records	Test reports
(3) QA/QC Practices and Criteria	Pressure gauge calibrated annually	Calibrated annually by TAI Engineering – alarm set point is visually verified	Smoke school trained personnel perform monitoring	Use reference method protocols
(4) Monitoring Frequency	Continuously	Continuously	Daily Monitoring	Once every 5 years
(5) Data Collection procedures	Data is recorded[1] when an excursion is noted	Alarms are recorded[1] electronically on the Alarm History Page by Mill Technician, 20 day running log	Records[1] are maintained to document daily checks	As required by Methods 201A, 1, 2, 3a, 4 and 5
	[1]Records shall be kept on site for at least five (5) years and shall be made available to the Department upon request [COMAR 26.11.03.06C]			
(6) Averaging Period	None	None	NA	NA

Table IV – 2	
2.0	**Emissions Unit Number(s): EU90-01 through EU90-12** **Slag Shipping** **ARA Registration No. 005-1484-6-2677**
2.1	**Applicable Standards/Limits:** A. Control of Particulate 1. COMAR 26.11.10.04A, which limits confined particulate matter emissions to 0.03 grains per standard cubic foot of dry exhaust gas (0.03 gr/scfd) from any iron or steel production installation. Compliance with the requirement listed in 3 below demonstrates compliance with this requirement. 2. COMAR 26.11.10.04B(1), which prohibits the discharge of fugitive (unconfined) emissions of particulate matter from any iron and steel production installation unless reasonable control methods are employed to minimize emissions. These methods include the use of hoods and control equipment to capture emissions, other control techniques, and process restrictions. 3. Particulate matter emissions (as PM-10) from each particulate matter emission point source shall not exceed 0.02 gr/scfd unless the Permittee can demonstrate, to the satisfaction of the Department, that: (a) the particulate matter emissions (as PM-10) from each particulate matter emissions point source does not exceed 0.03 gr/scfd; and (b) the total premises-wide particulate matter emissions (as PM-10), on a potential and actual basis, are less than 250 tons per year. **[Authority: ARA Permit to Construct No. 005-1484-6-2675M, 6-2676M and 6-2677 M issued October 10, 2002.]** 4. Operational Limitation - In order to meet the confined particulate matter emission requirements of COMAR 26.11.10.04A ,the exhaust gases from each of the following emission point sources shall vent through a baghouse prior to discharging to the

Table IV – 2	
	atmosphere: (a) Airslide 'A' (EU90-01); (b) Airslide 'B' (EU90-02); (c) Truck Loading (EU90-03); (d) Truck/Railcar Loading (EU90-04); (e) Silo 'A' Airslide and Screen (EU90-05); (f) Silo 'B' Airslide and Screen (EU90-06); (g) Barge Loading Head Pulley (EU90-08); (h) Barge Loading Slide (inboard) (EU90-09); (i) Barge Loading Slide (outboard) (EU90-10); and (j) Barge Loading Tail Pulley (EU90-12). **[Authority: ARA Permit to Construct No. 005-1484-6-2675M, 6-2676M and 6-2677 M issued October 10, 2002.]** B. Visible Emissions Limitations COMAR 26.11.10.03A(1), which prohibits visible emissions other than water vapor in an uncombined form. Exceptions: COMAR 26.11.10.03A(2)(e) - Section A(1) does not apply to "Confined emissions resulting from the building of new fires, the cleaning of fires, soot-blowing, start-ups, process modifications or adjustments, and occasional cleaning of control equipment and which are not greater than 40 percent opacity for one 6-minute period in any 60 minutes."
2.2	**Testing Requirements:** A. Control of Particulate See Monitoring, Record Keeping and Reporting Requirements. B. Visible Emissions Limitations See Monitoring, Record Keeping, and Reporting Requirements.
2.3	**Monitoring Requirements:** A. Control of Particulate 1. T

Table IV – 2		
	he Permittee shall maintain a written Fugitive Dust Control Plan which describes the reasonable control methods used to control dust from all fugitive dust sources at the facility, including truck and railcar loading operations, roads and stockpiles. The Fugitive Dust Control Plan shall be reviewed and updated at least once during the term of this permit **[Authority: COMAR 26.11.03.06C]**.	
	2. T he Permittee shall perform a visual inspection for a minimum of one (1) minute once per month, when weather conditions are favorable to create airborne particulate matter, to verify that the methods outlined in the Fugitive Dust Control Plan are being implemented. **[Authority: COMAR 26.11.03.06C]**	
	3. T he Permittee shall maintain a Dust Collector Operations and Maintenance Plan that describes the maintenance activity and time schedule for completing each activity for each baghouse in EU90. The Permittee shall perform maintenance activities within the time frames established in the plan. **[Authority: COMAR 26.11.03.06]**	
	B. <u>Visible Emissions Limitations</u> The Permittee shall conduct a visible emission observation for each of the emission units in EU90 at least once per month. Each observation shall be for a 6-minute period and the Permittee shall record the results of each observation. If emissions in the exhaust gases are visible, the Permittee shall perform the following: (a) Inspect all process and/or control equipment that may affect visible emissions; (b) Perform all necessary repairs and/or adjustments to all processes and/or control equipment, within 48 hours, so that visible emissions in the exhaust gases are eliminated; (c) Document, in writing, the results of the inspections and the repairs and/or adjustments made to the processes and/or control	

Table IV – 2	
	equipment; and (d) If visible emissions have not been eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily for an 18-minute period until corrective actions have eliminated the visible emissions. **[Authority: COMAR 26.11.03.06C]**
2.4	**Record Keeping Requirements:** A. Control of Particulate 1. The Permittee shall maintain the Fugitive Dust Control Plan and all updates to the plan and records of the visual inspections on-site for at least five (5) years and shall make them available to the Department upon request. **[Authority: COMAR 26.11.03.06C]** 2. The Permittee shall also maintain a log with records of the dates and description of the maintenance that was performed on each baghouse. The preventative maintenance plan and maintenance log shall be kept on-site for at least five (5) years. **[Authority: COMAR 26.11.03.06C]** 3. The Permittee shall keep records on site for at least five (5) years of the calculated annual PM-10 emissions (in tons) and shall make the records available to the Department upon request. **[Authority: COMAR 26.11.03.06C]** B. Visible Emissions Limitations The Permittee shall maintain a log of visible emissions observations performed for each emission point, including the location, date and results of each observation. The logs shall be kept on site for at least five (5) years and shall be made available to the Department upon request. **[Authority: COMAR 26.11.03.06C]**
2.5	**Reporting Requirements:** A. Control of Particulate 1. The Permittee shall maintain a Fugitive Dust Control Plan. Any updates to the Fugitive Dust Control Plan shall be submitted to the

Table IV – 2	
	Department upon request **[Authority: COMAR 26.11.03.06C]**. 2. The Permittee shall make the baghouse operations and preventative maintenance log available to the Department upon request. **[Authority: COMAR 26.11.03.06C]** B. <u>Visible Emissions Limitations</u> The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, “Report of Excess Emissions and Deviations”. **[Authority: COMAR 26.11.03.06C]**

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

SECTION V INSIGNIFICANT ACTIVITIES

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

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

(2) ✓ Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;

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

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

(b) No. 5 Storage of lubricating oils;

(c) No. 1 Unheated storage of VOC with an initial boiling point of 300 °F (149 °C) or greater;

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

(e) No. 1 Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;

(4) ✓ Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a total cooking area of 5 square feet (0.46 square meter) or less;

(5) ✓ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process; and

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

SECTION VI STATE-ONLY ENFORCEABLE CONDITIONS

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

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

1. Applicable Regulations:

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

   (B) For EU70-12 only, COMAR 26.11.09.10B, which specifies that used oil shall be considered on-specification used oil if the used oil has a minimum flash point of 100º F and does not contain materials that exceed the following allowable levels:

Material	Allowable Level in Parts Per Million (PPM)
Lead	100
Total Halogens	4000
Arsenic	5
Cadmium	2
Chromium	10

   For used oil that does not satisfy the rebuttable presumption for halogens at 40 CFR §279.10(b)(1)(ii) and §279.63, the maximum allowable level for halogens may not exceed 1000 ppm.

   (C) For EU70-12 only, COMAR 26.11.09.10C, which prohibits the Permittee from burning used oil or WCF in the fluid bed dryer (EU70-12) containing polychlorinated biphenyls (PCB) with a concentration of 50 ppm or greater.

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

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

2. Testing and Monitoring:

The Permittee shall have analyzed at least twice a year, by an independent laboratory, representative samples of the used oil and WCF, which shall include the concentration of each of the materials listed in COMAR 26.11.09.10B, the PCB concentration, and the flash point for each representative sample.

3. Record Keeping and Reporting:

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

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

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

(B) The Permittee shall keep records on site for at least five (5) years of the annual fuel use of each fuel and the semi-annual analysis reports of the used oil and WCF and make those records available to the Department upon request.

(C) The Permittee shall submit the analysis results of the used oil and WCF with annual certification report.

BACKGROUND

The Lafarge Building Materials, Inc. – Sparrows Point Facility (Lafarge/Permittee), owned by Holcim (US), Inc., processes slag received via rail, truck and barge. The processed slag cement is sold to concrete producers for use as an additive. The Sparrows Point Facility is located at 2001 Wharf Road, in Sparrows Point, Maryland, Baltimore County, Area III (as defined in COMAR 26.11.01.03). The primary SIC code for this facility is 3295.

The facility is divided into two distinct operations – slag grinding and slag shipping. Each operational area is described below.

- **Slag Grinding (ARA Registration No. 005-1484-6-2676)** – Raw slag is received at the facility by truck, rail, and barge. The grinding operation consists of raw slag stockpiles, crusher, conveying systems, slag silos, slag dryer, grinding, mills, and finished slag cement silos. Trucks deposit raw material onto one of two raw slag stockpiles, and conveyors and front end loaders are used to transfer the raw slag from the piles to the raw slag silos. Raw slag is wet granulated slag, which has a typical moisture content of 8-13%. A small crusher is used to break larger pieces of consolidated raw slag typically taken from the auxiliary slag storage pile. A fluid bed dryer, with an attached baghouse, is used to produce dry slag. The dry slag is then mixed with additional raw slag and ground in one of two finish mills to produce slag cement. The finished product is then stored in one of two storage silos.

- **Slag Shipping (ARA Registration No. 005-1484-6-2677)** – A truck and truck/railcar loadout station exists next to the product silos. A truck or railcar may be loaded simultaneously or two trucks may be loaded simultaneously. Barge loading operations are also present at the facility. The slag cement is conveyed via airslides from the product silos onto a belt conveyor that extends to the barge loading area. The product travels to two airslides and loadout nozzles, which are simultaneously used to fill each compartment of the barge.

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

Table 1: Actual Emissions

Year	NO_x (TPY)	SO_x (TPY)	PM_{10} (TPY)	CO (TPY)	VOC (TPY)	Total HAP (TPY)
2016	8.01	0.05	32.30	6.72	0.44	0.00
2015	7.30	0.04	35.34	6.13	0.40	0.00
2014	7.53	0.04	27.13	6.33	0.41	0.00
2013	6.44	0.04	28.72	5.41	0.35	0.00
2012	6.14	0.04	31.73	5.16	0.34	0.00

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

On March 26, 2018, Holcim (US), Inc. submitted an application to administratively amend their Title V – Part 70 Operating Permit to change the ownership of the facility to Holcim (US), Inc. An administrative completeness review was conducted and the application was deemed to be administratively complete.

CHANGES AND MODIFICATIONS TO THE PART 70 OPERATING PERMIT

On March 26, 2018 Holcim (US), Inc. submitted an application to administratively amend their Title V – Part 70 Operating Permit to change the ownership of the facility to Holcim (US), Inc. Holcim (US), Inc. officially purchased the company on December 31, 2017. The facility name will remain Lafarge Building Materials, Inc. The Part 70 Operating Permit has been amended to reflect the change. The amended permit will supersede the Part 70 Operating Permit issued on September 1, 2016 and will expire on August 31, 2021.

RECENT STACK TESTS

Particulate Matter

At least once during the term of the permit, the Permittee is required to conduct emission tests on the following emission points associated with the Slag Grinding and Drying Area (ARA Registration No. 005-1484-6-2676) in order to demonstrate compliance with the 0.02 grains per standard cubic foot of dry exhaust gas PM-10 point source emissions limit:

1. The Fluid Bed Dryer baghouse emission point (EU70-12); **AND**
2. The Separator ‘A’ baghouse emission point (EU70-33) and the Finish Mill ‘A’ System baghouse emission point (EU70-29); **OR**
3. The Separator ‘B’ baghouse emission point (EU70-34) and the Finish Mill ‘B’ System baghouse emission point (EU70-30) for the terms of the permit.

The required particulate matter stack emission tests for the current Title V – Part 70 operating permit term were performed on April 27-28, 2016. The test results demonstrated that the particulate matter emission rate from each baghouse was below the allowable emission rate of 0.02 gr/dscf.

Nitrogen Oxides

At least once during the term of the permit, the Permittee is required to conduct a stack emissions test on the fluid bed dryer stack (EU70-12) to determine total NO_X emissions and to establish an emission factor that will be used to calculate NO_X emissions for annual emission certification reporting purposes IF used oil is burned. A NO_X emissions rate of 0.51 tons/hr was calculated from the dryer during stack testing conducted on April 27-28, 2016.

GREENHOUSE GAS (GHG) EMISSIONS

The Lafarge facility emits the following greenhouse gases (GHGs) related to Clean Air Act requirements: carbon dioxide, methane, and nitrous oxide. These GHGs originate from the dryer when combusting fuels. The facility has not triggered Prevention of Significant Deterioration (PSD) requirements for GHG emissions; therefore, there are no applicable GHG Clean Air Act requirements. The Permittee shall quantify facility wide GHGs emissions and report them in accordance with Section 3 of the Part 70 permit.

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

Table 2: Greenhouse Gases Emissions Summary

GHG	**Conversion factor**	**2014** tpy CO_2e	**2015** tpy CO_2e	**2016** tpy CO_2e
Carbon dioxide CO_2	1	7,182	8,755	8,698
Methane CH_4	25	3.5	4.25	4.5
Nitrous Oxide N_2O	300	39	48	54
Total GHG CO_{2eq}		**7224.5**	**8,807.25**	**8,756.5**

EMISSION UNIT IDENTIFICATION

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

Table 3: Emission Unit Identification

ARA Registration Number	**Emissions Unit Number**	**Emissions Unit Name and Description**	**Date of Installation**
Slag Grinding and Drying Area			

ARA Registration Number	Emissions Unit Number	Emissions Unit Name and Description	Date of Installation
005-1484-6-2676	EU70-01*	Raw Slag Hauling	1980, modified 2001, 2002
005-1484-6-2676	EU70-02*	Raw Slag Unloading	1980, modified 2001, 2002
	EU70-03*	Raw Slag Conveyors	
	EU70-04*	Raw Slag Stockpile	
	EU70-05*	Raw Slag Silo Conveyors	
	EU70-06*	Auxiliary Slag Stockpile	
	EU70-07*	Auxiliary Slag Unloading	
	EU70-08*	Auxiliary Slag Crusher	
	EU70-09*	Raw Slag Silo	
	EU70-10*	Raw Slag Conveyors	
	EU70-11*	Raw Slag Feeder	
	EU70-12	Fluid Bed Slag Dryer, fired by natural gas, propane gas, used oil, and waste combustible fluid (WCF) – Baghouse DC405	
	EU70-13	Propane Vaporizer	
	EU70-14	Dry Slag Silo Conveyors – Baghouse DC510B	
	EU70-15	Dry Slag Silo 'A' – Baghouse DC510A	
	EU70-16	Dry Slag Silo 'B' – Baghouse DC510B	
	EU70-17*	Railcar Unloading	
	EU70-18*	Radial Stacker	
	EU70-19*	Raw Material Stockpile	
	EU70-20*	Raw Material Conveyor	
	EU70-21*	Raw Material Unloading	
	EU70-22*	Raw Material Conveyors and Hoppers	
	EU70-23*	Raw Material Conveying System	
	EU70-24*	Raw Material Silo Conveying System	
	EU70-25*	Silo	
	EU70-26*	Raw Slag Silo	
	EU70-27*	Finish Mill 'A' Conveyors	
	EU70-28*	Finish Mill 'B' Conveyors	
	EU70-29	Finish Mill 'A' System – Baghouse DC602A	
	EU70-30	Finish Mill 'B' System – Baghouse DC602B	
	EU70-31*	Iron Tailings Conveyors	
	EU70-32*	Iron Tailings Storage	
	EU70-33	Separator 'A' – Baghouse DC608A	
	EU70-34	Separator 'B' – Baghouse DC608B	
	EU70-37	Product Storage Silos Conveying System – Baghouse DC649	
	EU70-38	Product Storage Silo 'A' – Baghouse DC645A	
	EU70-39	Product Storage Silo 'B' – Baghouse DC645B	
Slag Shipping Area			

ARA Registration Number	Emissions Unit Number	Emissions Unit Name and Description	Date of Installation
005-1484-6-2677	EU90-01	Airslide 'A' – Bin vent BV826	1980, modified 2001, 2002
005-1484-6-2677	EU90-02	Airslide 'B' – Bin vent BV829	1980, modified 2001, 2002
	EU90-03	Truck Loading – Baghouse DC820	
	EU90-04	Truck/Railcar Loading – Baghouse DC834	
	EU90-05	Silo 'A' Airslide and Screen – Baghouse DC713A	
	EU90-06	Silo 'B' Airslide and Screen – Baghouse DC713B	
	EU90-07*	Barge Loading Conveyor System	
	EU90-08	Barge Loading Head Pulley – Baghouse DC720	
	EU90-09	Barge Loading Slide (inboard) – Baghouse DC721	
	EU90-10	Barge Loading Slide (outboard) – Baghouse DC722	
	EU90-11*	Paved Haul Roads	
	EU90-12	Barge Loading Tail Pulley – Baghouse DC714A	

* Denotes unconfined source. All remaining units are point sources.

AN OVERVIEW OF THE PART 70 PERMIT

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

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

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

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

emissions and deviations, to submit an annual emissions certification report and an annual compliance certification report, and results of sampling and testing.

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

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

Section VI of the Part 70 Permit contains State-only enforceable requirements. Section VI identifies requirements that are not based on the Clean Air Act, but solely on Maryland air pollution regulations. These requirements generally relate to the prevention of nuisances and implementation of Maryland's Air Toxics Program.

REGULATORY REVIEW/TECHNICAL REVIEW/COMPLIANCE METHODOLOGY

Table IV-1
Emissions Units EU70:
Slag Grinding and Drying (ARA Registration Number No. 005-1484-6-2676)

Applicable Standards and Limits

A. Control of Particulate

1. COMAR 26.11.10.04A, which limits confined particulate matter emissions to 0.03 grains per standard cubic foot of dry exhaust gas (0.03 gr/scfd) from any iron or steel production installation. Compliance with the requirement listed in 3 below demonstrates compliance with this requirement.

2. COMAR 26.11.10.04B(1), which prohibits the discharge of fugitive (unconfined) emissions of particulate matter from any iron and steel production installation unless reasonable control methods are employed to minimize emissions. These methods include the use of hoods and control equipment to capture emissions, other control techniques, and process restrictions.

3. Particulate matter emissions (as PM-10) from each particulate matter emission point source shall not exceed 0.02 gr/scfd unless the Permittee can demonstrate, to the satisfaction of the Department, that:

   (a) the particulate matter emissions (as PM-10) from each particulate matter emissions point source does not exceed 0.03 gr/scfd; and

(b) the total premises-wide particulate matter emissions (as PM-10), on a potential and actual basis, are less than 250 tons per year.

[Authority: ARA Permit to Construct No. 005-1484-6-2675M, 6-2676M and 6-2677 M issued October 10, 2002.]

4. Operational Limitation – In order to meet the confined particulate matter emission requirements of COMAR 26.11.10.04A, the exhaust gases from each of the following emission point sources shall vent through a baghouse prior to discharging to the atmosphere:

(a) Fluid Bed Dryer (EU70-12);
(b) Dry Slag Silo Conveyors (EU70-14);
(c) Dry Slag Silo 'A' (EU70-15);
(e) Dry Slag Silo 'B' (EU70-16);
(f) Finish Mill 'A' System (EU70-29);
(g) Finish Mill 'B' System (EU70-30);
(h) Separator 'A' (EU70-33);
(i) Separator 'B' (EU70-34);
(j) Product Storage Silos Conveying System (EU70-37);
(k) Product Storage Silo 'A' (EU70-38); and
(l) Product Storage Silo 'B' (EU70-39).

[Authority: ARA Permit to Construct No. 005-1484-6-2675M, 6-2676M and 6-2677 M issued October 10, 2002.]

Compliance Demonstration for Control of Particulate

To ensure that no fugitive (unconfined) emissions of particulate matter are discharged from the installations, the Permittee shall maintain a written Fugitive Dust Control Plan. The plan describes the reasonable methods used to control dust from all fugitive (unconfined) dust sources at the facility, including truck and railcar loading operations, roads, and stockpiles. The Fugitive Dust Control Plan shall be reviewed and updated at least once during the term of this permit and submitted to the Department upon request.

The Permittee also maintains a Dust Collector Operations and Maintenance Plan to monitor the operation of the baghouses. Preventative maintenance is scheduled using manufacturer's recommendations and prior experience. Preventative maintenance work orders are stored in the facility's electronic system.

To demonstrate compliance with the particulate matter emissions limits, the Permittee is required to perform stack emission testing at least once during the term of the permit. The most recent stack test was performed in April of 2016. Particulate matter emissions from all fugitive (unconfined) dust sources are calculated using AP-42 emissions factors. The premises wide particulate matter emissions at the facility are consistently less than 250 tons per year.

Rationale for Periodic Monitoring for Control of Particulate
The Fugitive Dust Control Plan, Dust Collector Operations and Maintenance Plan and particulate matter stack emissions testing are sufficient monitoring and testing methods to demonstrate compliance with the particulate matter standards.

B. Visible Emissions Limitations

1. COMAR 26.11.09.05A, which prohibits emissions from any fuel burning equipment, other than water in an uncombined form, which is visible to human observers except that, for the purpose of demonstrating compliance using COM data, emissions that are visible to a human observer are those that are equal to or greater than 10 percent opacity. This requirement applies to EU70-13 only.

   Exceptions: Section A of this regulation does not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if: (a) The visible emissions are not greater than 40 percent opacity; and (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period.

2. COMAR 26.11.10.03A(1), which prohibits visible emissions other than water vapor in an uncombined form.

   Exceptions: COMAR 26.11.10.03A(2)(e) - Section A(1) does not apply to “Confined emissions resulting from the building of new fires, the cleaning of fires, soot-blowing, start-ups, process modifications or adjustments, and occasional cleaning of control equipment and which are not greater than 40 percent opacity for one 6-minute period in any 60 minutes.”

Compliance Demonstration for Visible Emissions Limitations
Particulate matter is the only source of visible emissions at the facility. To demonstrate compliance with the visible emissions requirements the Permittee conducts monthly visible emissions observations on each unit, with the exception of EU70-12, 29, 30, 33, and 34. Monthly visible emissions observations are sufficient to demonstrate compliance as the units are smaller and are not equipped with baghouses or have baghouses rated at less than 5,000 ACFM or less.

EU70-12, 29, 30, 33, and 34 are the largest sources of PM at the facility and are equipped with large baghouses rated 30,000 ACFM or greater. Daily visible emissions observations are performed on these emissions units. These units are also subject to compliance assurance monitoring (CAM), described in detail in the CAM section of this fact sheet.

An EPA Method 9 visible emissions observation is only required if visible emissions are witnessed and not eliminated within 48 hours. To ensure continuous compliance, a log of visible emissions results shall be maintained on site for at least five (5) years and provided to the Department upon request. Incidences of visible emissions shall also be reported to the Department accordingly.

Rationale for Periodic Monitoring for Visible Emissions Limitations
Monthly and daily visible emissions observations are sufficient to determine if visible emissions are present. Adherence to the CAM plan provides further assurance that the baghouse control devices are operating properly to prevent visible emissions.

C. Control of Sulfur Oxides
Operational Limitation - The Permittee may only burn the following types of fuels, individually or in any combination, in the fluid bed dryer (EU70-12) unless the Permittee applies for and receives an approval or permit from the Department to burn alternate fuels:

(a) Natural gas;
(b) Propane gas;
(c) On-specification used oil as defined in COMAR 26.11.09.01B(4-2);
(d) Off-specification used oil as defined in COMAR 26.11.09.01B(4-1); and
(e) Waste combustible fluid (WCF) as defined in COMAR 26.11.09.01B(10).
[Authority: ARA Permit to Construct No. 005-1484-6-2675M, 6-2676M and 6-2677M issued October 10, 2002.]

Compliance Demonstration and Rationale for Periodic Monitoring for Control of Sulfur Oxides
In order to comply with these requirements, the Permittee shall keep records of annual fuel usage and used oil and WCF analysis reports. These records are sufficient to demonstrate compliance and shall be made available to the Department upon request.

D. Control of Nitrogen Oxides
At least once during the term of this permit, the Permittee shall quantify the NOx emissions from the fluid bed dryer (EU70-12).
[Authority: COMAR 26.11.03.06C]

Compliance Demonstration and Rationale for Periodic Monitoring for Control of Nitrogen Oxides
In addition to maintaining records of fuel usage, the Permittee must perform a stack test on the fluid bed dyer at least once during the term of the permit if used oil is burned. The stack test will be used to determine a NOx emissions factor to be used to calculate total NOx emissions for the annual emissions certification report. The stack test provides an accurate NOx emissions factor in order to ensure that the Lafarge facility's NOx emissions remain below the major source threshold. Fuel usage records and stack testing are sufficient to quantify NOx emissions.

E. Control of VOC
COMAR 26.11.10.06A(1), which limits VOC emissions from iron and steel production installations to 20 pounds per day.

Compliance Demonstration and Rationale for Periodic Monitoring for Control of VOC
The daily VOC emissions from the facility are consistently less than 20 pounds per day. COMAR 26.11.06.06 is not applicable, because there is a source specific VOC regulation in COMAR 26.11.10 that takes precedence. To demonstrate compliance with the VOC limit, the Permittee shall calculate VOC emissions and report them in the annual emissions certification report. This report provides a direct statement of compliance with the regulatory requirement.

Table IV-2
Emissions units EU90:
Slag Shipping (ARA Registration No. 005-1484-6-2677)

Applicable Standards and Limits

A. Control of Particulate
1. COMAR 26.11.10.04A, which limits confined particulate matter emissions to 0.03 grains per standard cubic foot of dry exhaust gas (0.03 gr/scfd) from any iron or steel production installation. Compliance with the requirement listed in 3 below demonstrates compliance with this requirement.

2. COMAR 26.11.10.04B(1), which prohibits the discharge of fugitive (unconfined) emissions of particulate matter from any iron and steel production installation unless reasonable control methods are employed to minimize emissions. These methods include the use of hoods and control equipment to capture emissions, other control techniques, and process restrictions.

3. Particulate matter emissions (as PM-10) from each particulate matter emission point source shall not exceed 0.02 gr/scfd unless the Permittee can demonstrate, to the satisfaction of the Department, that:

   (a) the particulate matter emissions (as PM-10) from each particulate matter emissions point source does not exceed 0.03 gr/scfd; and

   (b) the total premises-wide particulate matter emissions (as PM-10), on a potential and actual basis, are less than 250 tons per year.

[Authority: ARA Permit to Construct No. 005-1484-6-2675M, 6-2676M and 6-2677 M issued October 10, 2002.]

4. Operational Limitation – In order to meet the confined particulate matter emission requirements of COMAR 26.11.10.04A, the exhaust gases from each of the following emission point sources shall vent through a baghouse prior to discharging to the atmosphere:

   (a) Airslide 'A' (EU90-01);
   (b) Airslide 'B' (EU90-02);
   (c) Truck Loading (EU90-03);
   (d) Truck/Railcar Loading (EU90-04);
   (e) Silo 'A' Airslide and Screen (EU90-05);
   (f) Silo 'B' Airslide and Screen (EU90-06);
   (g) Barge Loading Head Pulley (EU90-08);
   (h) Barge Loading Slide (inboard) (EU90-09);
   (i) Barge Loading Slide (outboard) (EU90-10); and
   (j) Barge Loading Tail Pulley (EU90-12).

[Authority: ARA Permit to Construct No. 005-1484-6-2675M, 6-2676M and 6-2677 M issued October 10, 2002.]

Compliance Demonstration for Control of Particulate

To ensure that no fugitive (unconfined) emissions of particulate matter are discharged from the installations, the Permittee shall maintain a written Fugitive Dust Control Plan. The plan describes the reasonable methods used to control dust from all fugitive (unconfined) dust sources at the facility, including truck and railcar loading operations, roads, and stockpiles. The Fugitive Dust Control Plan shall be reviewed and updated at least once during the term of this permit and submitted to the Department upon request.

The Permittee also maintains a Dust Collector Operations and Maintenance Plan to monitor the operation of the baghouses. Preventative maintenance is scheduled using manufacturer's recommendations and prior experience. Preventative maintenance work orders are stored in the facility's electronic system.

Rationale for Periodic Monitoring for Control of Particulate

The emission units equipped with baghouses are small sources of particulate matter emissions. The baghouses associated with these emission units are designed to meet the applicable particulate matter limits when operated and maintained properly. The Fugitive Dust Control Plan and Dust Collector Operations and Maintenance Plan are sufficient to ensure compliance with the particulate matter standards.

B. Visible Emissions Limitations

COMAR 26.11.10.03A(1), which prohibits visible emissions other than water vapor in an uncombined form.

Exceptions: COMAR 26.11.10.03A(2)(e) - Section A(1) does not apply to "Confined emissions resulting from the building of new fires, the cleaning of fires, soot-blowing, start-ups, process modifications or adjustments, and occasional cleaning of control equipment and which are not greater than 40 percent opacity for one 6-minute period in any 60 minutes."

Compliance Demonstration and Rationale for Periodic Monitoring for Visible Emissions Limitations

Particulate matter is the only source of visible emissions at the facility. To demonstrate compliance with the visible emissions requirement the Permittee conducts monthly visible emissions observations on each unit. Monthly visible emissions observations are sufficient to demonstrate compliance as the units are smaller and are not equipped with baghouses or have baghouses rated at less than 5,000 ACFM or less.

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

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

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

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

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

Emission Units Subject to CAM

The Permittee has identified the following five emission units that are subject to CAM:

(1) Fluid Bed Dryer (EU70-12) – Controlled by baghouse DC405;
(2) Finish Mill 'A' System (EU70-29) – Controlled by baghouse DC602A;
(3) Finish Mill 'B' System (EU70-30) – Controlled by baghouse DC602B;
(4) Separator 'A' (EU70-33) – Controlled by baghouse DC608A; and
(5) Separator 'B' (EU70-34) – Controlled by baghouse DC608B.

Table 4: CAM Plan

Part 64 Requirement	**CAM Plan**			
A. Indicator 64.4(a)(1)	**Indicator No. 1**	**Indicator No. 2**	**Indicator No. 3**	**Indicator No. 4**
	Pressure Drop (ΔP; does not include Dryer)	**Bag Leak Detector**	**Visible Emissions Monitoring**	**Reference Test Methods**
Measurement Approach	Pressure drop through the baghouse is measured continuously using a differential pressure gauge	Bag leak is detected continuously with alarms sounding	Visible emissions monitoring that triggers inspection and maintenance when visible emissions are observed	Reference testing using Methods 201A, 1, 2, 3a, 4 and 5
B. Indicator Range(s) 64.4(a)(2)	ΔP at 4" H_2O (triggers pulse cleaning) Normal range: 2" to 8" H_2O	Alarms sounding	No visible emissions	Particulate Matter (PM10) ≤ 0.02 gr/dscf
C. Performance Criteria 64.4(a)(3) (1) Data Representativeness	ΔP across the baghouse is measured at the baghouse inlet and exhaust. The minimum accuracy of the device is ± 0.5" H_2O	Bag leak detector measured on clean side of bags, prior to discharging to atmosphere	Visible emissions and inspections are performed at the baghouse	Test sampling done at the exhaust of the baghouse.
(2) Verification of Operational Status	Indicator Gauge	Indicator Gauge	Operation records	Test reports
(3) QA/QC Practices and Criteria	Pressure gauge calibrated annually	Calibrated annually by TAI Engineering – alarm set point is visually verified	Smoke school trained personnel perform monitoring	Use reference method protocols
(4) Monitoring Frequency	Continuously	Continuously	Daily Monitoring	Once every 5 years

Part 64 Requirement	**CAM Plan**			
A. Indicator 64.4(a)(1)	**Indicator No. 1**	**Indicator No. 2**	**Indicator No. 3**	**Indicator No. 4**
	Pressure Drop (ΔP; does not include Dryer)	**Bag Leak Detector**	**Visible Emissions Monitoring**	**Reference Test Methods**
(5) Data Collection procedures	Data is recorded[1] when an excursion is noted	Alarms are recorded[1] electronically on the Alarm History Page by Mill Technician, 20 day running log	Records[1] are maintained to document daily checks	As required by Methods 201A, 1, 2, 3a, 4 and 5
	[1]Records shall be kept on site for at least five (5) years and shall be made available to the Department upon request [COMAR 26.11.03.06C]			
(6) Averaging Period	None	None	NA	NA

CAM Plan Rationale

The pressure drop through each baghouse is monitored continuously. An increase in pressure drop can indicate that the cleaning cycle is not frequent enough, cleaning equipment is damaged, or the bags are becoming blinded. Decreases in pressure drop may indicate significant holes and tears or missing bags.

The bag leak detector (opacity) alarms on the Finish Mill and Separator baghouses will alert the main control room of dusting immediately. Daily visible emissions checks allow for an immediate notification of the control room staff. Both bag leak detector alarms and visible emissions checks will initiate corrective actions. Frequent alarming or observations of visible emissions can indicate that bags are damaged or becoming blinded. Maintenance activities should be initiated in such cases and documented in the electronic work order system.

Stack testing for particulate will confirm performance of the baghouses and that operation within the indicator ranges continues to assure compliance with the particulate limit.

Rationale for selection of indicator ranges: The indicator range for baghouse pressure drop is between 2 and 10 in. H_2O. This range was selected based on historical data obtained during normal operation. The pressure drop is typically around 7 to 8 in. H_2O.

The opacity indicator range is selected at greater than 0% as it will immediately alert facility personnel to dusting. When problems are indicated, inspection and other activities are initiated to correct the problem.

Other Emission Units

The Lafarge facility uses baghouses on other emissions units at the facility as “inherent process equipment” that, according to 40 CFR, Part 64, are “necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations." Therefore, these baghouses are not considered control devices under the CAM rule and are exempt from the requirements of a CAM plan.

COMPLIANCE SCHEDULE

The Permittee is currently in compliance with all applicable air quality regulations

TITLE IV – ACID RAIN

Not Applicable

TITLE VI – OZONE DEPLETING SUBSTANCES

The Permittee is not subject to Title VI requirements.

SECTION 112(r) – ACCIDENTAL RELEASE

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

PERMIT SHIELD

The Permittee did request a permit shield. The facility requested that a permit shield be expressly included in the Permittee’s Part 70 permit. Permit shields are granted on an emission unit by emission unit basis. If an emission unit is covered by a permit shield, a permit shield statement will follow the emission unit table in Section IV - Plant Specific Conditions of the permit. In this case, a permit shield was granted for each emission unit covered by the permit.

INSIGNIFICANT ACTIVITIES

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

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

(2) ✓ Equipment for drilling, carving, cutting, routing, turning, sawing, planing, spindle sanding, or disc sanding of wood or wood products;

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

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

(b) No. 5 Storage of lubricating oils;

(c) No. 1 Unheated storage of VOC with an initial boiling point of 300 °F (149 °C) or greater;

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

(e) No. 1 Storage of motor vehicle gasoline and having individual tank capacities of 2,000 gallons (7.6 cubic meters) or less;

(4) ✓ Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a total cooking area of 5 square feet (0.46 square meter) or less;

(5) ✓ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process; and

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

STATE ONLY ENFORCEABLE REQUIREMENTS

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

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

1. Applicable Regulations:

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

   (B) For EU70-12 only, COMAR 26.11.09.10B, which specifies that used oil shall be considered on-specification used oil if the used oil has a minimum flash point of 100º F and does not contain materials that exceed the following allowable levels:

Material	Allowable Level in Parts Per Million (PPM)
Lead	100
Total Halogens	4000
Arsenic	5
Cadmium	2
Chromium	10

   For used oil that does not satisfy the rebuttable presumption for halogens at 40 CFR §279.10(b)(1)(ii) and §279.63, the maximum allowable level for halogens may not exceed 1000 ppm.

   (C) For EU70-12 only, COMAR 26.11.09.10C, which prohibits the Permittee from burning used oil or WCF in the fluid bed dryer (EU70-12) containing polychlorinated biphenyls (PCB) with a concentration of 50 ppm or greater.

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

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

2. Testing and Monitoring:

   The Permittee shall have analyzed at least twice a year, by an independent laboratory, representative samples of the used oil and WCF, which shall include the concentration of each of the materials listed in COMAR 26.11.09.10B, the PCB concentration, and the flash point for each representative sample.

3. Record Keeping and Reporting:

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

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

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

(B) The Permittee shall keep records on site for at least five (5) years of the annual fuel use of each fuel and the semi-annual analysis reports of the used oil and WCF and make those records available to the Department upon request.

(C) The Permittee shall submit the analysis results of the used oil and WCF with annual certification report.