



Subject: Emissions Certification Due April 1, 2008

You are required by Maryland air quality regulations COMAR 26.11.01.05-1 and 26.11.02.19D to certify your air emissions for the past calendar year. The certified emissions are used for inventory and planning purposes as well as to form a basis for billing of your Permit-to-Operate fee.

Please note that there are some important changes to the emissions certification requirements this year. New EPA emissions reporting requirements, and the initiation of a climate change program have caused these changes.

The air pollutants to be certified fall into the categories of criteria air pollutant, toxic air pollutant or greenhouse gas air pollutant. Criteria pollutants are particulate matter (reported as PM_{10} , $PM_{2.5}$, and total particulate), sulfur oxides (SOx), nitrogen oxides (NOx), carbon monoxide (CO), lead (Pb), and volatile organic compounds (VOC).

One significant change for this year is that all forms of particulate matter must be broken down and reported as follows:

(1) *Primary PM, PM_{10} and $PM_{2.5}$* : Particles that enter the atmosphere as a direct emission from a stack or an open source. It is comprised of two components: Filterable PM and Condensable PM. (these two PM components are the components measured by a stack sampling train such as EPA Method 5 and have no upper particle size limit.)

(2) *Filterable PM, PM_{10} and $PM_{2.5}$* : Particles that are directly emitted by a source as a solid or liquid at stack or release conditions and captured on the filter of a stack test train.

(3) *Condensable PM, PM_{10} and $PM_{2.5}$* : Material that is vapor phase at stack conditions, but which condenses and/or reacts upon cooling and dilution in the ambient air to form solid or liquid PM immediately after discharge from the stack.

There are 192 toxic air pollutants. A copy of the list of air toxics is available on the MDE website referenced below. Greenhouse gas air pollutants include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Fuel burning sources emit CO_2 , CH_4 , and N_2O . Only certain industrial sources emit HFCs, PFCs, and SF_6 . Electric generating units are exempt from the requirement to report toxic air pollutants, but must report criteria pollutants, greenhouse gas pollutants, and mercury emissions.

Your emissions certification for calendar year 2007 must be submitted in hard copy to the Air and Radiation Management Administration (ARMA) offices by April 1, 2008. Copies of the forms needed to complete the certification are located on the Maryland Department of the Environment website at http://www.mde.state.md.us/Programs/AirPrograms/air_compliance/index.asp.

The forms to be filled out to complete your emissions certification are as follows:

Form 1: General Facility Information - to be completed by all facilities.

Form 2: Criteria Air Pollutants - a separate copy of this form is to be used to report emissions of each criteria air pollutant except particulate matter (sulfur oxides, nitrogen oxides, carbon monoxide, volatile organic compounds). If more than one fuel is used for the equipment, calculate and list emissions separately for each fuel.

Form 3: Criteria Pollutant – Particulate matter. (Submit three copies: PM_{total}, PM₁₀, PM_{2.5})

Form 4: Toxic Air Pollutants - a separate copy of this form is to be used to report emissions of each toxic air pollutant.

Form 5: Billable Toxic Air Pollutants – this form is to be used to report emissions of eleven toxic air pollutants that are not already billable as criteria pollutants. These eleven toxic air pollutants are already listed on the form, you just need to fill in the information related to emissions from your facility. Please note that these eleven pollutants should also be included on Form 3.

Form 6: Greenhouse Gases

Note: You will need to make the necessary copies of the Forms as required for your facility. Also please note that emissions are to be listed on Forms 2, 3 and 4 by registered piece of equipment.

Calculations supporting the emissions numbers reported on the certification forms must be included with your submittal. If AP-42 factors are used to determine emissions, please make sure that the most recent factors are used. AP-42 factors can be found at www.epa.gov/ttn/chief. Records such as production logs, purchase orders, and fuel bills that substantiate the numbers used in the calculations should be maintained on site and made available to ARMA inspectors upon request.

You must also include with your certification a statement indicating the compliance status of your facility with regard to Maryland's Air Toxic Regulations (COMAR 26.11.15) for the past calendar year as required by your operating permit.

Please submit **TWO COPIES** of the completed certification forms to the following address:

Maryland Department of the Environment
Air and Radiation Management Administration
1800 Washington Boulevard, Suite 715
Baltimore, Maryland 21230-1720
Attention: Laramie Daniel, Compliance Program

Should you have any questions or require assistance completing this certification, please call your ARMA inspector at 410-537-3231.

Sincerely,



Pars Ramnarain, Chief
Process Compliance Division
Air and Radiation Management Administration