



1801 Annapolis Road, Baltimore, MD 21230
www.win-waste.com

March 30, 2024

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

Dear Daniel:

Enclosed are the Wheelabrator Baltimore L.P. 2023 Annual Title V Permit No. 24-510-01886 Compliance Certification and Emission Certification Reports. Any questions regarding this report should be forwarded to Tim Porter, Director Air Quality (tporter@win-waste.com) or 603-498-2134.

Specifically, this report contains:

1. EPA Form A –Comp – Annual Compliance Certification
2. Plant Wide Conditions Certifications
3. MDE Emissions Certification Report
 - a. Form 1 - General Facility Information Report
 - b. Form 2 – Criteria Air Pollutants Emission Certification Reports
 - c. Form 3 – Emission Certification Report Particulate Matter
 - d. Form 4 – Toxic Air Pollutants Emission Certification Reports
 - e. Form 5 – Billable Toxic Air Pollutants Emission Certification Reports
 - f. Form 6 – Greenhouse Gas Air Pollutants Emissions Certification Reports
4. Annual Emission Calculation Sheet and Information

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 is, to the best of my knowledge and belief, true, accurate, and complete. I am aware of the significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please advise if additional information is required.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Robertson', written over a horizontal line.

Jim Robertson
Plant Manager

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

MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard, Suite 715 Baltimore Maryland 21230-1720
410-537-3000 1-800-633-6101 <http://www.mde.state.md.us>
Air and Radiation Management Administration
Air Quality Compliance Program
410-537-3220

FORM 1:

GENERAL FACILITY INFORMATION
EMISSIONS CERTIFICATION REPORT

Calendar Year: 2023

A. FACILITY IDENTIFICATION				Do Not Write in This Space	
Facility Name Wheelabrator Baltimore, L.P.				Date Received Regional	
Address 1801 Annapolis Road				Date Received State	
City Baltimore County City of Baltimore Zip Code 21230				AIRS Code	
B. Briefly describe the major function of the facility				FINDS Code	
Wheelabrator Baltimore, L.P. is a large municipal solid waste combustor which processes up to 2,250				SIC Code	
tons of municipal solid waste per day and has the capacity to generate 60,000 kilowatts of energy.				Facility Number:	
				TEMPO ID:	
C. SEASONAL PRODUCTION (% if applicable)				Reviewed by:	
<u>Winter</u> (Dec.-Feb.)	<u>Spring</u> (Mar – May)	<u>Summer</u> (Jun – Aug)	<u>Fall</u> (Sept – Nov)		
25.1%	18.7%	28.9%	27.4%	Name _____ Date _____	
D. Explain any increases or decreases in emissions from the previous calendar year for each registration at this facility.					
Changes due to seasonal variability (weather / fuel related) as well as annual variability in stack test results.					
E. CONTROL DEVICE INFORMATION (for NOx and VOC sources only)					
Control Device	Capture Efficiency	Removal Efficiency			

I am familiar with the facility and the installations and sources for which this report is submitted. I have personally examined the information in this report, which consists of 17 pages (including attachments) and certify that the information is correct to the best of my knowledge.

Jim Robertson	Plant Manager	3/29/2024
Name (Print/Type)	Title	Date
Signature		(410) 234-0808 x212
		Telephone

FORM 2:

CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Calendar Year: 2023Facility Name: Wheelabrator Baltimore, L.P.Facility ID#: 24-510-01886Pollutant: Carbon Monoxide (CO)

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
2-24-0255 Boiler 1		MSW	S	19.9	159	24	7	52	251		24	00:00	24:00	C-1
			F											
2-24-0256 Boiler 2		MSW	S	18.2	104	24	7	52	350		24	00:00	24:00	C-1
			F											
2-24-0257 Boiler 3		MSW	S	17.3	102	24	7	52	339		24	00:00	24:00	C-1
			F											
			S											
			F											
			S											
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			S											
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			F											
			S											
			F											
			S											
			F											
Total				55.4	365									

S-Stack Emissions

F-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

MSW = Municipal Solid Waste

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption technique
A4-Solid Absorption Technique
A5-Freezing Out technique
A9-Other, Specify

C1-User calculated based on source
test or other measurement
C2-User calculated based on material balance
using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering
Judgment

C5-User calculated based on a State or local
agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

FORM 2:

CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Calendar Year: 2023Facility Name: Wheelabrator Baltimore, L.P.Facility ID#: 24-510-01886Pollutant: Lead

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
2-24-0255 Boiler 1		MSW	S	0.0173	0.138	24	7	52	251		24	00:00	24:00	C-1
			F											
2-24-0256 Boiler 2		MSW	S	0.0047	0.027	24	7	52	350		24	00:00	24:00	C-1
			F											
2-24-0257 Boiler 3		MSW	S	0.009	0.009	24	7	52	339		24	00:00	24:00	C-1
			F											
			S											
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S-Stack Emissions

F-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

MSW = Municipal Solid Waste

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption technique
A4-Solid Absorption Technique
A5-Freezing Out technique
A9-Other, Specify

C1-User calculated based on source
test or other measurement
C2-User calculated based on material balance
using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering
Judgment

C5-User calculated based on a State or local
agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

FORM 2:

**CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT**

Calendar Year: 2023Facility Name: Wheelabrator Baltimore, L.P.Facility ID#: 24-510-01886Pollutant: Nitrogen Oxides (NOx)

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
2-24-0255 Boiler 1		MSW	S	195.5	1558	24	7	52	251		24	00:00	24:00	C-1
			F											
2-24-0256 Boiler 2		MSW	S	274.4	1568	24	7	52	350		24	00:00	24:00	C-1
			F											
2-24-0257 Boiler 3		MSW	S	268.2	1582	24	7	52	339		24	00:00	24:00	C-1
			F											
			S											
			F											
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			F											
Total			F	738.1	4708									

S-Stack Emissions

F-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

MSW = Municipal Solid Waste

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption technique
A4-Solid Absorption Technique
A5-Freezing Out technique
A9-Other, Specify

C1-User calculated based on source
test or other measurement
C2-User calculated based on material balance
using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering
Judgment

C5-User calculated based on a State or local
agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

FORM 2:

CRITERIA AIR POLLUTANTS EMISSIONS CERTIFICATION REPORT

Calendar Year: 2023Facility Name: Wheelabrator Baltimore, L.P.Facility ID#: 24-510-01886Pollutant: Sulfur Dioxide (SO2)

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
2-24-0255 Boiler 1		MSW	S	29.9	238	24	7	52	251		24	00:00	24:00	C-1
			F											
2-24-0256 Boiler 2		MSW	S	67.5	386	24	7	52	350		24	00:00	24:00	C-1
			F											
2-24-0257 Boiler 3		MSW	S	60.3	356	24	7	52	339		24	00:00	24:00	C-1
			F											
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Total				157.7	980									

S-Stack Emissions

F-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

MSW = Municipal Solid Waste

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption technique
A4-Solid Absorption Technique
A5-Freezing Out technique
A9-Other, Specify

C1-User calculated based on source
test or other measurement
C2-User calculated based on material balance
using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering
Judgment

C5-User calculated based on a State or local
agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

FORM 2:

**CRITERIA AIR POLLUTANTS
EMISSIONS CERTIFICATION REPORT**

Calendar Year: 2023Facility Name: Wheelabrator Baltimore, L.P.Facility ID#: 24-510-01886Pollutant: VOC

Equipment Description/ Registration No.	SCC Number	Fuel		Actual Emissions		Operating Schedule (Actual)				TOSD	Operating Schedule			Emissions Methods
				Tons/yr	Lbs/day	Hrs/dy	Dys/wk	Wk/yr	Days/yr	Lbs/dy	Hrs/dy	Start	End	
2-24-0255 Boiler 1		MSW	S	0.5	4.0	24	7	52	251		24	00:00	24:00	C-1
			F											
2-24-0256 Boiler 2		MSW	S	0.7	4.0	24	7	52	350		24	00:00	24:00	C-1
			F											
2-24-0257 Boiler 3		MSW	S	0.7	4.1	24	7	52	339		24	00:00	24:00	C-1
			F											
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			F											
Total			F	1.9	12.1									

S-Stack Emissions

F-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of source

TOSD: Typical Ozone Season Day means a typical day of that period of the year during which conditions for photochemical conditions are most favorable, which is generally during sustained periods of direct sunlight and warm temperatures (April-September). This section needs to be completed only for VOC and NOx sources.

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

MSW = Municipal Solid Waste

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption technique
A4-Solid Absorption Technique
A5-Freezing Out technique
A9-Other, Specify

C1-User calculated based on source
test or other measurement
C2-User calculated based on material balance
using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering
Judgment

C5-User calculated based on a State or local
agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

FORM 3: PM**EMISSIONS CERTIFICATION REPORT**Calendar Year: 2023Facility Name: Wheelabrator Baltimore, L.P.Facility ID#: 24-510-01886Pollutant: Particulate Matter

Equipment Description/ Registration No.	SCC Number	Fuel		PM - Filterable		PM 10 - Filterable		PM 2.5 - Filterable		PM Condensable		Operation Days/yr	Emissions Methods
				Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day	Tons/yr	Lbs/day		
2-24-0255 Boiler 1		MSW	S	5.4	43	5.4	43	5.4	43	19	151.4		C-1/A-1
			F										
2-24-0256 Boiler 2		MSW	S	4.1	23.4	4.1	23.4	4.1	23.4	7.4	42.3		C-1/A-1
			F										
2-24-0257 Boiler 3		MSW	S	1.0	5.9	1.0	5.9	1.0	5.9	14.7	86.7		C-1/A-1
			F										
			S										
			F										
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			F										
Total				10.5	384.4	10.5	384.4	10.5	384.4	41.1	280.4		

S-Stack Emissions

F-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of source

Fuel: Include emissions for each fuel used. If more than one fuel is used, calculate and list emissions separately for each fuel.

MSW = Municipal Solid Waste

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption technique
A4-Solid Absorption Technique
A5-Freezing Out technique
A9-Other, Specify

C1-User calculated based on source
test or other measurement
C2-User calculated based on material balance
using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering
Judgment

C5-User calculated based on a State or local
agency emission factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standard

FORM 4:**Calendar Year: 2023**

TOXIC AIR POLLUTANTS

EMISSIONS CERTIFICATION REPORT

Facility Name: **Wheelabrator Baltimore, L.P.** Facility ID: **24-510-01886** Pollutant: **Arsenic***

Equipment Description/ Registration Number ¹		Actual Emissions			Control Device **	% Efficiency
		Tons/yr	Lbs/day	Lbs/hour		
2-24-0255 Boiler 1		0.0005	0.004	0.00017	S/B	
2-24-0256 Boiler 2		0.0003	0.0017	0.00006	S/B	
2-24-0257 Boiler 3		0.0001	0.0006	0.00003	S/B	
TOTALS		0.0009	0.0063	0.00026		

***Please attach all calculations.**

*See Attachment 1 for the minimum reporting values

****Control Device**

S = Scrubber

B — Baghouse

ESP = Electrostatic Precipitator

A = Afterburner

C ■ Condenser

AD = Adsorbtion

0 = Other

¹ Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

FORM 4:

Calendar Year: 2023

TOXIC AIR POLLUTANTS

EMISSIONS CERTIFICATION REPORT

Facility Name: **Wheelabrator Baltimore, L.P.** Facility ID: **24-510-01886** Pollutant: **Cadmium***

Equipment Description/ Registration Number ¹		Actual Emissions			Control Device **	% Efficiency
		Tons/yr	Lbs/day	Lbs/hour		
2-24-0255 Boiler 1		0.0004	0.003	1.39E-04	S/B	
2-24-0256 Boiler 2		0.0004	0.002	9.85E-05	S/B	
2-24-0257 Boiler 3		0.0001	0.001	5.05E-05	S/B	
TOTALS		0.0236	0.006	2.88E-04		

*Please attach all calculations.

*See Attachment 1 for the minimum reporting values

**Control Device

S = Scrubber

B — Baghouse

ESP = Electrostatic Precipitator

A = Afterburner

C ■ Condenser

AD = Adsorption

O = Other

¹ Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

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Calendar Year: 2023

¹ Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

Calendar Year: 2023

Facility Name: **Wheelabrator Baltimore, L.P.** Facility ID: **24-510-01886** Pollutant: **Mercury***

O = Other

¹ Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

Calendar Year: 2023

¹ Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

FORM 5

Calendar Year: 2023

BILLABLE TOXIC AIR POLLUTANTS

EMISSIONS CERTIFICATION REPORT

Facility Name: Wheelabrator Baltimore, L.P.

Facility ID#: 24-510-01886

Chemical Name	CAS Number		Actual Emissions			Estimation Method
			Tons/year	Lbs/day	Lbs/hr	
carbon disulfide	75-15-0	S				
		F				
carbonyl sulfide	463-58-1	S				
		F				
chlorine	7782-50-5	S				
		F				
cyanide compounds	57-12-5	S				
		F				
hydrochloric acid	7647-01-0	S	18.0	111.2	4.85	A1, C1
		F				
hydrogen fluoride*	7664-39-3	S	0.53	3.38	0.17	A1, C1
		F				
methyl chloroform	71-55-6	S				
		F				
methylene chloride	75-09-2	S				
		F				
perchloroethylene	127-18-4	S				
		F				
phosphine	7803-51-2	S				
		F				
titanium tetrachloride	7550-45-0	S				
		F				
TOTALS			18.53	114.58	5.02	

Emission Estimation Method

A1-U.S. EPA Reference Method
A2-Other Particulate Sampling Train
A3-Liquid Absorption Technique
A4-Solid
A5-Freezing Out Technique
A9-Other, Specify

C1-User calculated based on source test or other measurement
C2-User calculated based on material balance using engineering knowledge of the process
C3-User calculated based on AP-42
C4-User calculated by best guess/engineering judgment
C5-User calculated based on a State or local agency factor
C6-New construction, not operational
C7-Source closed, operation ceased
C8-Computer calculated based on standards

This form to include only the eleven chemicals identified

N-Stack Emissions

N-Fugitive Emissions

Daily emissions (lbs/day) are lbs/operating day of the source

PLEASE NOTE: Be sure to attach all data and calculations necessary to support the emissions figures shown above.

See Attachment 1 for minimum reporting values

* Hydrogen fluoride results non-detect

FORM 6: Greenhouse GasesCalendar Year: **2023****GREENHOUSE GAS AIR POLLUTANTS****EMISSIONS CERTIFICATION REPORT**Facility Name: **Wheelabrator Baltimore**Facility ID: **24-510-01886**Pollutant: **Methane**

Equipment Description/ Registration Number ¹	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hour
2-24-0255 Boiler 1	0.5	4.0	0.17
2-24-0256 Boiler 2	0.7	4.0	0.16
2-24-0257 Boiler 3	0.6	3.5	0.16
TOTALS	1.8	11.5	0.49

This form must be used to report
Greenhouse gas emissions:

- carbon dioxide (CO₂)
- methane (CH₄)
- nitrous oxide (N₂O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF₆)

*Use a separate form for each pollutant.

*Please attach all calculations

¹ Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

FORM 6: Greenhouse GasesCalendar Year: **2023****GREENHOUSE GAS AIR POLLUTANTS****EMISSIONS CERTIFICATION REPORT**Facility Name: **Wheelabrator Baltimore**Facility ID: **24-510-01886**Pollutant: **Carbon Dioxide**

Equipment Description/ Registration Number ¹	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hour
2-24-0255 Boiler 1	184,550	1470520	65,551
2-24-0256 Boiler 2	276,434	1579624	66,683
2-24-0257 Boiler 3	251,955	1486462	63,641
TOTALS	712,940	4536607	194,875

This form must be used to report
Greenhouse gas emissions:

- carbon dioxide (CO₂)
- methane (CH₄)
- nitrous oxide (N₂O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF₆)

*Use a separate form for each pollutant.

*Please attach all calculations

¹ Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

¹ Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

Calendar Year: 2023

Facility Name: **Wheelabrator Baltimore, L.P.** Facility ID: **24-510-01886** Pollutant: **Hydrofluorocarbons**

¹ Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

Calendar Year: 2023

EMISSIONS CERTIFICATION REPORT

Facility Name: **Wheelabrator Baltimore, L.P.** Facility ID: **24-510-01886** Pollutant: **Perfluorocarbons**

Equipment Description/ Registration Number ¹	Actual Emissions		
	Tons/yr	Lbs/day	Lbs/hour
2-24-0255 Boiler 1	Not Emitted		
2-24-0256 Boiler 2			
2-24-0257 Boiler 3			
TOTALS	0	0	0

- carbon dioxide (CO₂)
- methane (CH₄)
- nitrous oxide (N₂O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF₆)

*Please attach all calculations

¹ Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

Calendar Year: 2023

EMISSIONS CERTIFICATION REPORT

Facility Name: **Wheelabrator Baltimore, L.P.** Facility ID: **24-510-01886** Pollutant: **Sulfur hexafluoride**

[illegible]

- carbon dioxide (CO₂)
- methane (CH₄)
- nitrous oxide (N₂O)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF₆)

***Please attach all calculations**

¹ Emissions must be broken down by equipment registration number (ex. 9-0076, 9-0077)

