

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0075-AOP-R26 AFIN: 41-00001

1. PERMITTING AUTHORITY:

Division of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Ash Grove Cement Company
4343 Highway 108
Foreman, Arkansas 71836

3. PERMIT WRITER:

Elliott Marshall

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Cement Manufacturing
NAICS Code: 327310

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
3/4/2025	Modification	-Update SN-04F.TX1 emissions to be PTE and Include nat. gas combustion emissions

6. REVIEWER'S NOTES:

This application was submitted as a modification to revise emission limits for SN-04F.TX1 in the emission summary table and Specific Conditions #WDF-1 and #WDF-2 to reflect potential emissions from the 6.5 MMBtu/hr thermal oxidizer (TOU) and include natural gas combustion emissions. Facility permitted emission rates are increasing by 0.2 tpy PM/PM₁₀, 18.3 tpy VOC, 6.4 tpy CO, 1.5 tpy NO_x and 0.09 tpy Total HAPs.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

In an inspection dated August 16, 2022, the inspector found opacity exceedances for SN535.BF20 and SN-449.BF40 and exceedance in daily clinker production limit for SN40F.TX1. The facility also submitted self-reported deviations on November 30, 2022

The facility has since been sent a Formal Enforcement and High Profile Violations (HPV) letter; formal enforcement violations are currently proceeding through formal enforcement channels.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? N

b) Is the facility categorized as a major source for PSD? Y

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

PTE emissions for the TOU (SN-04F.TX1) are well below all PSD significant emission rates (SERs), and no upstream or downstream emissions are affected by operation of the equipment.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
326.CH22, 326.CH26, 403.CHM, 403.CHR, 403.CHU, 443.CH56, 443.CH46, 449.BF10, 449.BF15, 449.BF20, 449.BF30, 449.BF40, 449.BF50, 449.BF60, 449.BF70, 449.CH30, 449.CH31, 449.CH32, 449.CH33, 449.CH42, 449.HP2, 449.HP4, 449.T7, 449.T8, 533.LS10, 534.CH12, 514.BF1, 514.BF2, 514.BF3, 524.BF1, 524.BF2, 611.BF1, 611.BF3,	PM ₁₀	NESHAP Subpart LLL

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
611.BF4, 611.BF10, 611.BF20, 611.BF30, 611.BF40, 403.BF3, 403.BF4, 403.BF6, 403.BF7, 403.BF8, 612.BF1, 612.BF2, 612.BF3, 612.BF4, 612.BF5, 621.BF1, 621.BF2, 621.BF3, 621.BF5, 621.BF6(E), 621.BF7(W), 621.BF8, 621.BF9, 631.BF10, 631.BF15, 631.BF20, 631.BF25, 631.BF30, 513.BF1, 521.BF1, 521.BF2, 523.BF2, 531.BF10, 531.BF20, 533.BF10, 533.BF20, 534.BF10, 534.BF20, 535.BF10, 535.BF20, 44C.BF10, 44M.BF10, 409.BF10, 442.BF10, 442.BF20, 443.BF20, 449, BF31, 327.BF10, 327.BF20, 327.BF30, 442.BF10, 442.BF20, 443.BF20, 311.CHA, 326.BF10, 326.BF30, 329.BF10, 329.BF20, 611.UL10		
41A.BF10, 41A.BF20, 41A.T2, 41A.T10, 44A.T10, 44A.BF10, 44B.BF10	PM ₁₀	NSPS Subpart Y
41A.BF10, 41A.BF20, 44A.BF10, 213.BF10, 213.BF20, 213.T2, 213.T3, 221.BF10, 323.BF10, 325.BF10, 325.BF20, 325.BF30, 41A.T1, 111.T10, 111.T12, 111.T13, 111.T14, 111.T15, 213.T1, 221.CH01, 221.RMB1, 221.T1, 321.CH01, 323.T1, 41A.BF10, 41A.BF20, 44A.BF10, 41A.T3	PM ₁₀	NSPS Subpart OOO

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
41F.FT10, 40F.FT3, 40F.FT4, 40F.FT5, 40F.FT6, 40F.FT7, 40F.FT8, 40F.FT9, 40F.FTA, 40F.FT11	VOC	NSPS Subpart Kb
41F.FT10, 40F.FT3, 40F.FT4, 40F.FT5, 40F.FT6, 40F.FT7, 40F.FT8, 40F.FT9, 40F.FTA, 40F.TX1, 45F.TX10, 40F.FT11	Benzene Waste Operations	40 CFR Part 61, Subpart FF
41F.FT10, 40F.FT3, 40F.FT4, 40F.FT5, 40F.FT6, 40F.FT7, 40F.FT8, 40F.FT9, 40F.FTA, 40F.TX1, 45F.TX10, RCC, 40F.FT11	Benzene Waste Operations	40 CFR 63, Subpart DD
443.BF10, 443.BF30, 443.SK10	HAPs and THC	NESHAP Subpart EEE
710-EG10	Varies	NSPS Subpart IIII
Facility	Varies	NESHAP Subpart G
		NESHAP Subpart XX

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
N/A				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Rule 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N/A
If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
N/A		

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
CAM was evaluated for CO, SO ₂ , NO _x , VOC, and PM at the facility. The sources at the facility either do not use a control device, have pre-control emissions below the major source threshold, or satisfy CAM requirements with the existing continuous emissions monitoring system program as allowed in 40 C.F.R. § 64.3(d). CAM does not apply to units at the facility.		

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

This facility is subject to 40 C.F.R. § 63 Subpart EEE. This subpart requires a risk assessment to be performed. The risk assessment was initially performed in 1998 and most recently updated in 2017. No threat to the public health or safety was found.

c) H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards

Y

If exempt, explain: the facility does not have H₂S emissions.

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
443.SK10	Nov 2005 Penta Engineering Corp	SO ₂ : 2.79 lb/ton VOC: 0.202 lb/ton CO: 1.772 lb/ton NO _x : 3.071 lb/ton	SNCR (NO _x)	-	1,934,500 tons clinker/yr
	BACT	2500 lb/hr CO			
	2012/2017 Stack Test	PM: 27.3 lb/hr, 119.3 tpy PM ₁₀ : 336 lb/hr, 520.6 tpy			
	Sept 2022 Stack Test	NH ₃ : 78 lb/hr, 164 tpy			Roll Mill on 80%/off 20%
Transfer Points	AP-42 13.2.4	$E = k(0.0032) \frac{(U/5)^{1.3}}{(M/2)^{1.4}}$ lb/ton	Enclosure 323.T1, 41A.T1 41A.T2 311.CH10, 311.CH11, 311.CH15, 311.CH16 44A.T10 41A.T10	50%	PM k: 1.0 PM ₁₀ k: 0.35 U: 8.5 mph based on Shreveport data or 1 mph for enclosed area
Dust Collectors	Grain Loading Factor	0.01 gr/dscf or 0.005 gr/dscf	Fabric Filters	95%	7000 lb/gr
Finish Mills	Oct 2004 Testing	1.6 lb/ton grinding aid usage 1.1 g/mL grinding aid density 0.0021 lb/hr VOC / (mL/min) HAPs weight %	None	N/A	2,742,610 tons feed/yr
Storage piles	EPA-450/3-88-008	$E = 1.7 \left(\frac{S}{1.5} \right) \left(\frac{365 - p}{235} \right) \left(\frac{f}{15} \right)$ lb/day/acre	Moisture 403.P1	70%	f: 8.1% p: 97.6
Roads	AP-42 13.2.2	<u>Unpaved</u> s: 8.3% p: 97.6 days <u>Paved</u> sL: 1.74 g/m ²	Watering	95%	

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		p: 2342.4 hr N: 8760 hr			
40F.TX1	AP-42 1.4-2	$\frac{\text{lb}}{\text{MMscf}}$ PM/PM ₁₀ : 7.6 SO ₂ : 0.6	TO	95%	6.5 MMBtu/hr 4813 scf/hr
	AP-42 13.5-1	$\frac{\text{lb}}{\text{MMBtu}}$ VOC: 0.66 NO _x : 0.068 CO: 0.31			
	TANKS 4.09d	0.87 lb/hr VOC 3.82 tpy VOC HAPs			
	Mass Balance	HAPs weight%			
45F.TX10	AP-42 5.3-4	$L_t = 12.46 \frac{\text{SPM}}{T}$	RTO	95%	S: 1.45 T: 530 R
	AP-42 1.4-2	$\frac{\text{lb}}{\text{MMscf}}$ PM/PM ₁₀ : 7.6 SO ₂ : 0.6 VOC: 5.5 CO: 84 NO _x : 100 HAPs: 1.89			2.47 MMBtu/hr 8 lb/gal
BCC	AP-42 4.8.1.1	5.1808 lb VOC/8-hr day	None	N/A	770 container/yr 4 hr/ container
	Mass Balance	HAPs weight%			
449.CR10	NSPS IIII Tier 3	$\frac{\text{in g/kWh}}{\text{PM/PM}_{10}}$: 0.2 VOC: 4 CO: 3.5 NO _x : 4	None	N/A	373 kWh 500 HP 3.5 MMBtu/hr
	AP-42 3.3-1	SO ₂ : 2.05E-03 lb/hp-hr HAPs			

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
443.SK10	All	See NESHAP EEE		
443.SK10	Methane	18 with 25A or 25A with Methane cutter	Quarterly	To verify the methane portion of emission from 443.SK10
443.SK10	PM (Condensable)	202	Once every five years	§26.703(A)
HR07, HR15, HR17 - HR22, 111.R1A-F	Silt content of roads to verify PM ₁₀	Appendix C.1 and C.2 of AP- 42	Quarterly until each road segment has been tested twice.	§26.703(A)
HR01 - HR06, HR12 - HR14, HR16, HR23	Road surface silt loading to verify PM ₁₀			

17. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
443.SK10	CO	CEM	Continuously	Y
	VOC	THC Analyzer (CEM)	Continuously	Y
	NO _x	CEM	Continuously	Y
	SO ₂	CEM	Continuously	Y
40F.TX1 & 41F.TX10	Combustion chamber temperature	Continuous temperature recorder	Continuously	N
45F.TX10	Combustion chamber temperature	Continuous temperature recorder	Continuously	N

18. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
443.SK10 & Plantwide	Clinker production	5,300 tons/day	Daily	Y
443.SK10	Daily clinker production	Tons per hour	Hourly	N
	Operating Parameter Limits	See Appendix N	Daily	Y
403.P1	Pile area	871,200 ft ² / 20 acres	Annually	Y
449.P1	Pile area	174,240 ft ² / 4 acres	Annually	Y
213.P2	Pile area	87,120 ft ² / 2 acres	Annually	Y
41.AP1, 41.AP2, & 41.AP3	Pile area	40,143 ft ² / 0.92 acres (total)	Annually	Y
449.P2	Pile area	43,560 ft ² / 1 acre	Annually	Y
221.RMB1	Pile area	214,700 ft ² / 4.93 acres	Annually	Y
111.P1	Pile area	304,920 ft ² / 7.0 acres	Annually	Y
111.P2	Pile area	130,680 ft ² / 3.0 acres	Annually	Y
111.P3	Pile area	130,680 ft ² / 3.0 acres	Annually	Y
41A.P7	Pile area	261,360 ft ² / 6.0 acres	Annually	Y
710.EG10	Operating Hours	500 hours per consecutive 12-month period	As Necessary	Y
40F.TX1	Combustion chamber temperature	≥ 1500°F	Continuously	N
	Breakthrough indicators	Log of observations	Good engineering judgment	N
45F.TX10	Combustion chamber temperature	≥ 1425°F	Continuously	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
449.CR10	Fuel oil sulfur content	Not to exceed 0.05%	Each fuel shipment received	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
443.BF10, 443.BF30, & 443.SK10	20	NESHAP Subpart EEE	Weekly observation
326.BF10, 326.BF30, 326.CH22, 326.CH26, 327.BF10, 327.BF20, 329.BF10, 329.BF20, 403.CHM, 403.CHR, 403.CHU, 431.LS12, 442.BF20, 443.BF20, 443.CH46, 449.CH30, 449.CH31, 449.CH32, 449.CH33, 449.CH42, 449.HP2, 449.T7, 449.T8, 533.LS10, 534.CH12, M9, 514.BF1, 514.BF2, 514.BF3, 524.BF1, 524.BF2, 611.BF1, 611.BF3, 611.BF4, 611.BF10, 611.BF20, 611.BF30, 611.BF40, 611.UL10, 403.BF3, 403.BF4, 403.BF6, 403.BF7, 403.BF8, 612.BF1, 612.BF2, 612.BF3, 612.BF4, 612.BF5, 621.BF1, 621.BF2, 621.BF3, 621.BF5, 621.BF6(E), 621.BF7(W), 621.BF8, 621.BF9, 631.BF10, 631.BF15, 631.BF20, 631.BF25, 631.BF30, 409.BF10, 449.BF10, 449.BF15, 449.BF20, 449.BF30, 449.BF31, 449.BF40, 449.BF50, 449.BF60, 449.BF70, 513.BF1, 521.BF1, 521.BF2,	10	NESHAP Subpart LLL	Monthly observation

SN	Opacity	Justification for limit	Compliance Mechanism
523.BF2, 531.BF10, 531.BF20, 533.BF10, 533.BF20, 534.BF10, 534.BF20, 535.BF10, 535.BF20, 44C.BF10, 44M.BF10, 327.BF30, 442.BF10			
40F.TX1, 45F.TX10	10	Department Guidance	Natural gas only
41A.BF10, 41A.BF20, 41A.T2, 41A.T10, 44A.T10, 44A.BF10, 44B.BF10	10	NSPS Subpart Y	Weekly observation
41A.BF10, 41A.BF20, 44A.BF10, 213.BF10, 213.BF20, 213.T2, 213.T3, 221.BF10, 323.BF10, 325.BF10, 325.BF20, 325.BF30, 41A.T1, 41A.T3, 111.T10, 111.T12, 111.T13, 111.T14, 111.T15, 213.T1, 221.CH01, 221.RMB1, 221.T1, 321.CH01, 323.T1	Various	NSPS Subpart OOO	Weekly observation
311.CH10, 311.CH11, 311.CH15, 311.CH16, 403.T2, 449.T4, 449.T5, 449.T6, 449.T16	20	Department Guidance	Weekly observation
311.CH1, 311.CHC	40	Department Guidance	Weekly observation
211.BF1, 311.BF	20	Department Guidance	Weekly observation
41A.P1, 41A.P2, 41A.P3, 41A.P7, 213.P2, 403.P1, 449.P1, 449.P2, 111.P1, 111.P2, 111.P3	20	Department Guidance	Weekly observation
449.CR10	20	Department Guidance	Weekly observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/ PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
500 gal grinding aid tank x2	A-3			0.2			0.2	0.2
725 gal grinding aid tank	A-3			0.1			0.1	0.1
10,000 gal grinding aid tank	A-3			0.1			0.1	0.1
10,000 gal Masonry air entraining agent tank	A-3			0.1			0.1	0.1
10,000 gal diesel tanks x3	A-3			0.3			0.3	0.3
7,500 gal diesel tank	A-3			0.1			0.1	0.1
10,000 gal oil tank	A-3			0.1			0.1	0.1
550 gal kerosene tank	A-3			0.1			0.1	0.1
550 gal lubricant tanks x3	A-3			0.3			0.3	0.3
1,000 gal used oil tank	A-3			0.1			0.1	0.1
350 gal used oil tanks x2	A-3			0.2			0.2	0.2
A-3 TOTAL				1.7			1.7	1.7
Cadence Lab Vents	A-5			0.007			0.007	0.007
Piles associated with clean-up	A-13	4.92						
12,000 gal grinding aid tank	A-13			0.1				
3,000 gal gasoline tank	A-13			1.2				
30,000 gal grinding aid tank	A-13			0.2			0.2	0.2
A-13 TOTAL		4.92		1.32			0.20	0.20

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22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0075-AOP-R25

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Ash Grove Cement Company
 Permit Number: 0075-AOP-R26
 AFIN: 41-00001

\$/ton factor	28.14	Annual Chargeable Emissions (tpy)	7201.76
Permit Type	Modification	Permit Fee \$	1000

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500

Check if Facility Holds an Active Minor Source or Minor Source General Permit ☐

If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	20
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM: Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants: All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		338.7	338.9	0.2		
PM ₁₀		664.5	664.7	0.2	0.2	664.7
PM _{2.5}		0	0	0		
SO ₂		2704.4	2704.4	0	0	2704.4
VOC		249.9	268.2	18.3	18.3	268.2
CO		1731	1737.4	6.4		
NO _x		2987.6	2989.1	1.5	1.5	2989.1
1. (The following HAPs are bubbled together)	☐	0	0	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
1,1,1-Trichloroethane*	☐	205.46	205.46	0		
1,1,2,2-Tetrachloroethane*	☐	0	0	0		
1,1,2-Trichloroethane*	☐	0	0	0		
1,1-Dichloroethane*	☐	0	0	0		
1,2-Dichloroethane*	☐	0	0	0		
1,2-Dichloropropane*	☐	0	0	0		
Acrylonitrile*	☐	0	0	0		
Allyl Chloride*	☐	0	0	0		
Benzene*	☐	0	0	0		
Bromoform*	☐	0	0	0		
Bromomethane*	☐	0	0	0		
Carbon disulfide*	☐	0	0	0		
Carbon tetrachloride*	☐	0	0	0		
Chlorobenzene*	☐	0	0	0		
Chloroform*	☐	0	0	0		
Chloromethane*	☐	0	0	0		
Cumene*	☐	0	0	0		
Diethanolamine*	☐	0	0	0		
Ethyl Acrylate*	☐	0	0	0		
Ethylbenzene*	☐	0	0	0		
Ethylene Glycol*	☐	0	0	0		
Iodomethane*	☐	0	0	0		
Methyl Methacrylate*	☐	0	0	0		
Methyl tert-butyl ether*	☐	0	0	0		
Methylene chloride*	☐	0	0	0		
n-Hexane*	☐	0	0	0		
Styrene*	☐	0	0	0		
Toluene*	☐	0	0	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
trans-1,3-Dichloropropene*	☐	0	0	0		
Vinyl acetate*	☐	0	0	0		
Vinyl Bromide*	☐	0	0	0		
Vinyl chloride*	☐	0	0	0		
Xylene*	☐	0	0	0		
1,2,4-Trichlorobenzene*	☐	0	0	0		
1,4-Dichlorobenzene*	☐	0	0	0		
1,4-Phenylenediamine*	☐	0	0	0		
2,4,5-Trichlorophenol*	☐	0	0	0		
2,4,6,-Trichlorophenol*	☐	0	0	0		
2,4-Dinitrophenol*	☐	0	0	0		
2,4-Dinitrotoluene*	☐	0	0	0		
3,3'-Dichlorobenzidine*	☐	0	0	0		
4,4'-Methylenedianiline*	☐	0	0	0		
4-Aminobiphenyl*	☐	0	0	0		
4-Nitrobiphenyl*	☐	0	0	0		
4-Nitrophenol*	☐	0	0	0		
Aniline*	☐	0	0	0		
Benzidine*	☐	0	0	0		
bis(2-Chloroethyl) ether*	☐	0	0	0		
bis(2-Ethylhexyl) phthalate*	☐	0	0	0		
Dimethyl phthalate*	☐	0	0	0		
Hexachlorobenzene*	☐	0	0	0		
Hexachlorobutadiene*	☐	0	0	0		
Hexachlorocyclopentadiene*	☐	0	0	0		
Hexachloroethane*	☐	0	0	0		
Hydroquinone*	☐	0	0	0		
Isophorone*	☐	0	0	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Napthalene*	☐	0	0	0		
Nitrobenzene*	☐	0	0	0		
o-Anisidine*	☐	0	0	0		
o-Toluidine*	☐	0	0	0		
Pentachloronitrobenzene*	☐	0	0	0		
Pentachlorophenol*	☐	0	0	0		
Phenol*	☐	0	0	0		
-----	☐	0	0	0		
Dioxin/Furan*	☐	0.0000013	0.0000013	0		
-----	☐	0	0	0		
(The following emissions are bubbled together)	☐	0	0	0		
HCl	☒	416.76	416.76	0	0	416.76
Chlorine	☐	0	0	0		
-----	☐	0	0	0		
Arsenic*	☐	0.18	0.18	0		
Beryllium*	☐	0.18	0.18	0		
Cadmium*	☐	0.58	0.58	0		
Chromium*	☐	0.18	0.18	0		
Lead*	☐	0.58	0.58	0		
Mercury*	☐	0.39	0.39	0		
-----	☐	0	0	0		
(The following emissions are bubbled together)	☐	0	0	0		
Antimony*	☐	119.3	119.3	0		
Cobalt*	☐	0	0	0		
Manganese*	☐	0	0	0		
Nickel*	☐	0	0	0		
Selenium*	☐	0	0	0		
-----	☐	0	0	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Single HAP	☐	0	0	0		
Total Other HAP	☐	1.55	1.64	0.09		
-----	☐	0	0	0		
NOx + VOC adjustment	☒	-5.4	-5.4	0	0	-5.4
Ammonia	☒	164	164	0	0	164