

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0904-AOP-R16 AFIN: 72-00205

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Kawneer Company, Inc.
600 Kawneer Drive
Springdale, Arkansas 72764

3. PERMIT WRITER:

Bart Patton

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Metal Window and Door Manufacturing
NAICS Code: 332321

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
2/28/2025	Renewal	Correct the Grouping of SN-24 with SN-23; Increase IA A-7 Window Cutting Emissions
3/31/2025	Minor Modification	Replace existing SN-35
12/3/2025	Minor Modification	Add SN-36 and SN-37; Move Spent Acid Tank from IA A-3 to A-13

6. REVIEWER'S NOTES:

Kawneer Company, Inc. (Kawneer), an Arconic company, manufactures finished and painted architectural aluminum building products (NAICS 332321) at a facility located at 600 Kawneer Drive, Washington County, Springdale, Arkansas 72764.

This Title V renewal makes the following changes:

- Define the minimum fan speed for the RTO fan (part of SN-09) in the CAM Plan Conditions section
- Add a condition for reporting exceedances and excursions under CAM to the SN-09/21 CAM Plan Conditions section
- Incorporate Age Oven SN-24 as a separate source from SN-23, to correct an error that previously treated it as incapable of simultaneous operation with SN-23, and correct rounding of NO_x tpy to 1.5 in lieu of 1.6
- Correct the rounding of CO lb/hr at SN-34 from 0.2 to 0.3
- Separate SN-35 Acid Etch Process into SN-35 Acid Etch Boiler and SN-35A Acid Etch Process Emissions
- Increase emissions for Window Plant Cutting in Insignificant Activity Category A-7

In a minor modification letter issued in April 2025, the following changes were made:

- Replace existing 6.5 MMBtu/hr burner with new 8.9 MMBtu/hr burner at SN-35 (Acid Etch Process)

NESHAP Subpart DDDDD conditions for SN-35 were updated for the new burner and the current version of the regulation, but the modification did not result in a change in category under the regulation for SN-35.

In a minor modification letter issued in December 2025, the following changes were made:

- Add SN-36 Acid Etch Backup Boiler to the permit as a backup for SN-35 Acid Etch Boiler, including the requirements of NESHAP DDDDD that apply to SN-36
- Add SN-37 to the permit, including the requirements of NSPS JJJJ and NESHAP ZZZZ that apply to SN-37
- Move existing Spent Acid Storage Tank (6,000 gal) from Category A-3 of the Insignificant Activity list to Category A-13

The permit was updated to use Code of Arkansas Rules (CAR) citations and current standard language.

Annual permitted emission rates increased as follows: 0.6 tpy PM/PM₁₀, 0.3 tpy SO₂, 0.5 tpy VOC, 12.3 tpy CO, and 6.2 tpy NO_x.

A request to modify emissions related to the Bake Oven and RTO System was denied, because the calculation did not account for uncaptured emissions.

Vacated portions of 4J were mistakenly included in the December 2025 minor modification letter, but they were not incorporated into the permit.

A PAER analysis was added at this revision for HF emitted by reaction from the existing Acid Etch Process (SN-35A).

7. COMPLIANCE STATUS:

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

The facility was most recently inspected on April 11, 2024. No areas of concern were identified. The facility has no current or pending enforcement activities.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N

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

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
All Coating Operations	HAPs	NESHAP 40 C.F.R. Part 63 Subpart MMMM
Process Heaters, New (SN-19, 35, and 36) and Existing (SN-17, 18, 20, and 34)	HAPs	NESHAP 40 C.F.R. Part 63 Subpart DDDDD
Thermal Oxidizer (SN-21)	VOC & HAP	CAM
SN-37	CO and NOx	NSPS JJJJ
SN-37	HAPs	NESHAP ZZZZ

Category A-1 of the Insignificant Activities list contains a 1.5 MMBtu/hr natural gas-fired dry-off oven and four natural gas-fired Insulpour radiant heaters totaling 0.32 MMBtu/hr heat input. At R16, these sources were evaluated for applicability of NESHAP Subpart DDDDD. None of the sources meet the definition of a boiler under the subpart; they do not have the primary purpose of recovering thermal energy in the form of steam or hot water.

Under the subpart, a process heater is a device in which the combustion gases do not come into direct contact with process materials. The dry-off oven does not meet the definition of a process heater because the exhaust from the dry-off oven's burners directly contacts the surfaces being dried.

Under the subpart, the primary purpose of a process heater is to transfer heat indirectly to a process material or to a heat transfer material. The Insulpour radiant heaters do not meet the definition of a process heater because they are used for comfort heat in the area where the Insulpour process is used.

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
None				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

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

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
SN-09/ SN-21	VOC	1. Except for monitoring malfunctions, associated repairs and required quality assurance or control activities (maintenance and calibration checks), the permittee shall monitor the temperature of the RTO system continuously while the source is in operation. 2. The permittee shall follow a routine inspection and maintenance program. Maintenance and repair of the RTO System (SN-21) shall be performed per the manufacturer's specifications. 3. The permittee shall maintain a copy of the inspection and maintenance program to demonstrate compliance with Specific Condition #2. The inspection and maintenance program shall be maintained on-site and made available to Department personnel upon request. 4. The bed temperature at both ends of the Regenerative Thermal Oxidation (RTO) System (SN-21) shall not be less than 1500 degrees F while operating. This temperature need not be maintained while the RTO System is operating in Bypass mode or when the source is not in operation (SN-21A). 5. The permittee shall install and maintain a device to continuously measure and record the bed temperature at both ends of the regenerative thermal oxidation system (SN-09/21) in order to demonstrate compliance with Specific Condition #4 (maintain temperature 1500°F). 6. The temperature monitoring system which monitors the RTO system shall be installed, calibrated and operated according to the manufacturer's specifications. 7. The permittee shall maintain records to demonstrate compliance with Specific Condition #4. The permittee shall update

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
		these records by the fifteenth day of the month following the month to which the records pertain. These records shall be kept on-site and made available to Department personnel upon request. 8. The permittee shall continuously monitor the fan motor to verify that it is operating at or above the speed necessary for proper capture efficiency for the enclosure. 9. The permittee shall have an interlock between the fan motor speed and the automatic paint guns that prevents painting when the fan motor speed is lower than required for proper capture efficiency on the enclosure. The permittee need not operate the interlock while the RTO is operating in bypass mode (SN-21A). 10. The permittee may only operate the RTO Bypass Stack (SN-21A) when the RTO (SN-21) has an emergency outage, equipment malfunction, or is undergoing preventative maintenance. Whenever the RTO Bypass Stack (SN-21A) is opened, the permittee must keep a record that includes a description of why the Bypass Stack was opened, the length of time it remained open, the reasons for the outages of the RTO System, and the corrective actions taken. These records shall be maintained and reported in the semi-annual compliance reports required in General Provision #7 and § 63.3920. These records shall be kept on site and made available to Department personnel upon request.

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:

The non-criteria pollutants listed below were evaluated. Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Division of Environmental Quality has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Benzene	0.0639	0.007	0.00012	Yes
HF	0.4092	0.0450	0.0067	Yes

At R16, all Benzene is from combustion of natural gas. All HF is emitted from SN-35A, the Acid Etch Process. The permitted TLV limits do not allow for the use of Benzene or HF as process materials.

2nd Tier Screening (PAIL)

This permit contains a TLV table for non-criteria pollutants. Modeling was used to determine the permitted emission rates for ranges of non-criteria pollutants (grouped by TLV) that pass the PAER or PAIL. Therefore, modeling of specific non-criteria pollutants was not performed.

c) No other modeling was required.

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
02, 03, 17-22, 23,24, & 34	AP-42 Tables 1.4-1 & 1.4-2	(lb/MMscf) PM/PM ₁₀ – 7.6 SO ₂ – 0.6 VOC – 5.5 CO – 84 NO _x – 100	None	N/A	Natural gas emission factors. Natural gas is only fuel used.
02, 03, 17-22, 23, 24, 34, & 35	AP-42 Table 1.4-3	(lb/MMscf) Benzene – 2.1E-03	None	N/A	42.0 MMBtu/hr total.
09, 21, 21A	Fall 2008 on-site PTE MSDS Sheets & Actual Usage Mass Balance	Max 43.8 gal/hr: Primer 11.6 Topcoat 14.6 Clear coat 14.3 Touchup 3.3 VOC – 8.0 lb/gal HAP – 8.0 lb/gal Max hourly used: 43.8 gph x 8 lb/gal = 350.4 lb/hr. SN-21 VOC captured and controlled: Max VOC x Capt Eff x Destruct Eff. VOC emitted b/c not captured: Max VOC x (1-Capt Eff). SN-21 total: Capt & Controlled + Emitted B/c Not Captured. SN-21A (bypass): Max VOC assumed emitted.	RTO*	RTO operating or in bypass mode: 90% Capture Eff RTO operating: 95% Destruct Efficiency	Assumes all VOCs are HAPs. TLV Table based on AERMOD. Maximum 230 tpy VOC from Coating Operations by recordkeeping

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments		
09A	Fall 2008 on-site PTE MSDS Sheets & Actual Usage Mass Balance	Max usage 43.8 gal/hr Max VOC – 8.0 lb/gal HAP – 8.0 lb/gal x 2% loss to Cool Down	None	N/A	---		
12	MSDS Sheets & Actual Usage Mass Balance	Max usage 3.23 gal/hr ea VOC – 8.0 lb/gal HAP – 8.0 lb/gal	None	N/A	---		
26	MSDS Sheets or equivalent documents available	20, 880 max window units per month		None	N/A	Window Plant	
		Material	Usage				
			Gallons/hr				Gal/Yr
		Isopropyl	2.68				6004
		Sealer	7.01				15,703
		Lubricants	1.72				3853
		Epoxy	0.81				1815
29	MSDS Sheets & Actual Usage Mass Balance	Max usage 0.25 gal/hr	None	N/A	---		

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
32	Site-specific TDS data	1,538 ppm Total Dissolved Solids (PM = PM ₁₀); 0.02% drift rate assumed; 0.0002 x 0.001538 = 3.076E-7 wt PM/wt water	None	N/A	225 gpm + 345 gpm + 1,558 gpm = 2,128 gpm. 2,128 x 8.34 lb/gal density x 60 min/hr = 1.065E6 lb water/hr. 1.065E6 x 3.076E-7 = 0.33 lb PM/hr. 8,760 op hr/yr. 2,000 lb/ton.
35, 36	AP-42 1.4 Tables 1.4-1 through 1.4-4	Lb/MMscf PM/PM ₁₀ – 7.6 SO ₂ – 0.6 VOC – 5.5 CO – 84 NO _x – 100	-	-	Acid Etch Boilers (8.9 MMBtu/hr each, 8760 hr/yr)

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
35A	Emissions Calc Fact Sheet, Michigan DEQ, Nov 2005; Estimating Releases & Waste Treatment Efficiencies for the Toxic Chemical Release Form, EPA Dec 1987	Acid etch solution: 95% Ammonium BiFluoride 5% Ammonium Fluoride Amm BiF in water goes to Amm Fluoride + HF. Amm Fluoride in water goes to Ammonia + HF. Lb/lb/-mole: Ammonium bifluoride 57.05 Ammonium fluoride 36.034 HF 20.01 Ammonia 17.02 $E \text{ (lb/hr)} = \frac{\text{Mol wt of compound M (lb/lb-mol)} \times \text{Area of tank (sq ft)} \times \text{Vap pressure of compound in soln P (psia @ T)} \times \text{Gas-mass transfer coeff K } (0.011479 \times U^{0.78}/M^{1/3}) \times 3600}{\text{Gas constant R (10.73 psia ft}^3\text{/R lb/mol)} \times \text{Abs temp of soln (deg R)}}$	Scrubber	95% Capture 95% Destruct	Area of Tank: 192.5 sq ft. Tank temp: 115 F + 460 = 575 R. Air speed over Tank, U: 1.0 mph. Mole ration Amm Flu in soln: 0.56 HF, 0.47 Ammonia. Uncontrolled: HF, 0.0067 lb/hr, 0.03 tpy. Ammonia, 3.5812 lb/hr, 15.69 tpy. Controlled: HF, 6.49E-4 lb/hr, 0.003 tpy. Ammonia, 0.17 lb/hr, 0.75 tpy.
37	NSPS 4J standards, AP-42 Tables 3.2-2 and 3	lb/MMBtu PM 9.91 E-03 PM10 9.50 E-03 SO2 5.88E-04 g/kW-hr 16.1 HC + NOx 519 CO	None	N/A	63 hp, 0.574 MMBtu/hr. 1020 Btu/scf. 500 hr/yr.

*RTO – Regenerative Thermal Oxidizer

**SN-31 Equation

jD = Colburn J Factor (dimensionless)

V = air velocity over surface of tank

Sc = Schmidt number at 70° F (dimensionless)

psat = saturate vapor pressure of water

p = ambient vapor pressure at 70° F / 50% RH

MW = molecular weight of water

R = Ideal gas Constant

T = Temperature (°R) = °F + 460

Conc. = concentration of constituent of concern (mass fraction)

V = 5 mph * 5280 ft/mi = 26,400 ft/hr

E = $210 * (0.005 * 26,400) / 0.612^{1.5} * (0.0247 - 0.0123) * [18 / (0.73 * 565)] * 0.0005$

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
N/A				

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)
21	Temperature of both beds of the thermal oxidation system	Device to continuously measure and record temperature	Continuously	N
21	Enclosure Fan – Hertz applied to variable Speed controller	Device to continuously measure and record frequency	Continuously	N
35	pH	pH meter	Daily	N
35	Scrubber Flow	Flow meter	Daily	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)
Facility	Paint mixture formulations - MSDS	8.0 lb/gal VOC & HAP as applied	On-going	N
Facility	VOC Material Balance	230.0 tpy (material usage, not including combustion HAPs)	Monthly	Y
Facility	HAP Material Balance	230.0 tpy (material usage plus combustion HAPs)	Monthly	Y
Facility	Paint mixture HAP content	Content Table – MSDS	On-going	N
Facility	Subpart Mmmm Required Records	27.5 lb Hap / lb solid	Varies	Y
SN-19	Subpart DDDDD Required Records (CO and O ₂ concentrations, corrective actions)	N/A	For each 5-year tune-up	N (unless requested by Administrator)
SN-21	Temperature	≥ 1500 degrees F	Continuously	N
	Description of why the Bypass Stack was opened, reason for the outage of the RTO system, and the corrective actions taken	The permittee may only operate the RTO Bypass Stack (SN-21A) when the RTO (SN-21) has an emergency outage, equipment malfunction, or is undergoing preventative maintenance.	Whenever the RTO Bypass Stack (SN-21A) is opened	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
SN-26	Window Units Produced	20,880 units/month	Monthly	N
SN-35	Recirculation Rate	150 to 250 gpm	Daily	N
	pH	>7		
SN-35 and 36	Maintenance Records	See NESHAP DDDDD	Varies	N
SN-37	Operating Hours, Type of Operation	500 total, 50 non-emergency	Monthly	Y
Facility	Purchase invoices and receipts of aluminum billets, MSDS or equivalent documentation	All aluminum billets and logs processed shall be free of any paints, coatings, or lubricants	Monthly	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
02, 03, 07, 14-20, 22, 23/24, 34, 35, 36, 37	5%	8 CAR § 40-401 & Natural gas only fuel	Annual Inspection
09, 09A, 12, 21, 21A, 26, 29	20%	8 CAR § 41-403 and 40 C.F.R. § 52 Subpart E	Annual Inspection

20. DELETED CONDITIONS:

Former SC	Justification for removal
	None

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		Chromium
							Single	Total	
Dry-off Oven (1.5 MMBtu/hr)	A-1	0.05	0.01	0.04	0.54	0.64	0.01	0.01	-
Heat Shrink Gun (0.3 MMBtu/hr)	A-1	0.01	0.01	0.01	0.2	0.2	0.01	0.01	-
Ambient Temperature Control (0.5 MMBTU/hr)	A-1	0.02	0.01	0.02	0.18	0.22	0.01	0.01	-
Insulpour Radiant Heaters (4; 0.32 MMBtu/hr total)	A-1	0.02	0.01	0.01	0.11	0.14	0.01	0.01	-
A-1 Totals		0.10	0.04	0.08	1.03	1.20	0.04	0.04	
Anodize Caustic Storage Tank (5,900 gal)	A-4	-	-	-	-	-	-	-	-
Caustic Die Cleaning System (1,500 gal total capacity)	A-4	-	-	-	-	-	-	-	-
Wastewater Spent Caustic Tank (6,000 gal)	A-4	-	-	-	-	-	-	-	-
A-4 Totals									
Color Match Booth #2	A-5	-	-	0.85	-	-	0.47	0.47	-
Color Match Booth with Electric Oven for Quality Control	A-5	-	-	0.04	-	-	-	-	-
A-5 Totals				0.89			0.47	0.47	
Window Plant – Welding, Cutting, Drilling, Shearing and Stamping Stations (shavings too large to be airborne)	A-7	-	-	-	-	-	0.09	0.09	-
North Plant Welding, 2 stations	A-7	0.015	-	-	-	-	3.69 E-05	3.69 E-05	-
A-7 Totals		0.015					0.09	0.09	

Anodizing Area:
Twenty-four (24) 10,000 gallon Capacity each, Tanks #0 - #21:

Tank #1a – Soap

Tank #1b – Soap Rinse

Tanks #3a, 4a – Caustic (NaOH) Etch

Tanks #3b, 4b – Caustic Rinse

Tank #5 – Desmut

Tanks #6, 8, 10, 12, 14, 15 – City Water Rinse

Tanks #7, 9, 11, 13 – Sulfuric Acid Anodize (10% sulfuric acid)

Tank #16 – Color Bath/Sulfuric Acid (2% sulfuric acid)

Tanks #17, 18, 21 – City Water Rinse

Tank #19, 20 – Seal Tanks

Paint Room:
Five (5) 5,000 gallon Capacity each, Tanks #1 - #5

Tank #1 – Soap Tank

Tank #2 – City Rinse Water

Tank #3 – (see A-13)

Tank #4, 5 – Deionized Water Rinse

Source Name	Group A Category	Emissions (tpy)							
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs		Chromium
							Single	Total	
Paint Room: Tank #3 – Phosphochromating	A-13	-	-	-	-	-	-	-	0.06
Grit “Shot” Blaster (fully enclosed)	A-13	0.0	-	-	-	-	-	-	-
One (1) Parts Washer (50 gallon)	A-13	-	-	0.41	-	-	0.0	0.0	-
Solvent Still	A-13	-	-	0.09	-	-	-	-	-
Press #1 and Press #2 Sooters	A-13	3.4	-	-	0.02	0.01	-	-	-
Four (4) Aerosol Can Puncture Stations	A-13	-	-	<0.01	-	-	-	-	-
Insulpour	A-13	-	-	0.22	-	-	0.16 (MDI)	0.16 (MDI)	
Spent Acid Storage Tank (6,000 gal) (0.1 psia)	A-13	-	-	-	-	-	0.07	0.07	-
A-13 Totals		3.4		0.73	0.02	0.01	0.23	0.23	0.06
List Totals		3.515	0.04	1.70	1.05	1.21	0.83	0.83	0.06

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 #
0904-AOP-R15

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name:
Permit Number:
AFIN:

\$/ton factor	28.14	Annual Chargeable Emissions (tpy)	263.3
Permit Type	Minor Mod	Permit Fee \$	500

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)	7.3
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		3.5	4.1	0.6		
PM ₁₀		3.5	4.1	0.6	0.6	4.1
PM _{2.5}		0	0	0		
SO ₂		1.2	1.5	0.3	0.3	1.5
VOC		231.6	232.1	0.5	0.5	232.1
CO		16.2	28.2	12		
NO _x		18.9	24.8	5.9	5.9	24.8
Total HAP	☐	230	230	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Ammonia	☒	0.8	0.8	0	0	0.8