

## STATEMENT OF BASIS

For the issuance of Air Permit # 2123-AOP-R3 AFIN: 29-00506

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

American Electric Power Service Corporation (John W. Turk Jr. Power Plant)  
3711 Highway 355 South  
Fulton, Arkansas 71838

3. PERMIT WRITER:

Joseph Hurt

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Fossil Fuel Electric Power Generation  
NAICS Code: 221112

5. SUBMITTALS:

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
5/3/2013	Title V Renewal	Request to update minor corrections to numerous emission limits, remove case-by-case MACT requirements for SN-01 and SN-02, and remove the baghouse leak detection requirement for SN-01.
9/9/2013	Administrative Amendment	Add several caustic storage tanks, water washing of drums, and five gallon or less containers containing VOCs be added to the insignificant activity list.
12/16/2013	Administrative Amendment	Add a 4,800 gallon sulfuric acid tank to insignificant activity list.

6. REVIEWER'S NOTES:

Southwestern Electric Power Company (SWEPCO), a unit of American Electric Power (AEP), is constructing a new coal-fired electric power generating facility near Fulton, Arkansas, in Hempstead County. This facility is named the John W. Turk, Jr. Power Plant. The main steam generating unit consists of one ultra-supercritical pulverized coal boiler powering a single steam turbine designed for base load operation with a nominal net power output of 600 megawatts. This boiler burns sub-bituminous coal and natural gas.

As part of this renewal, AEP requested the following permit changes:

- Minor corrections to the following sources:
  - SN-02: Increase PM annual limit to 0.56 tpy;
  - SN-02: Increase Hexane short term limit to 1.0 lb/hr;
  - SN-03: Decrease Acetaldehyde short term limit to 0.01 lb/hr;
  - SN-03: Decrease Formaldehyde short term limit to 0.01 lb/hr;
  - SN-F-04: Increase PM<sub>10</sub> short term limit to 0.6 lb/hr;
  - SN-F-04: Increase PM<sub>10</sub> annual limit to 2.4 tpy;
  - SN-CT-01: Decrease PM<sub>10</sub> annual limit to 22.7 tpy; and
  - SN-TK-01: Decrease 1,3-Butadiene short term limit to 0.01 lb/hr.
- The calculations for SN-CT-01 are based on a total dissolved solids (TDS) concentration of 750 ppm, but the previous permit limits TDS to 7500 ppm, and this should be corrected;
- AEP request that ADEQ delete SC 58, which requires installation and operation of a baghouse leak detection system at SN-01;
- AEP is revising the emission calculations for the active coal piles;
- AEP requests that ADEQ remove the case-by-case MACT requirements for SN-01 and SN-02; and
- AEP has revised the emission estimates for the dust collectors and fans represented by EP-10 through EP-25 by adjusting the exhaust flow rates for several of the sources.

AEP withdrew their request to increase the PM annual limit at SN-02; therefore, no changes were made. The TDS limit in the permit was revised to 750 ppm to be consistent with the original PSD application, and this application.

The request to remove the baghouse leak detection system is being denied. This condition is a compliance mechanism from the PSD permit issued under Air Permit 2123-AOP-R0. Even though SN-01 is subject to 40 CFR Part 60, Subpart Da, which provides compliance options for either installing a COMS or a baghouse leak detection system, the requirement for a leak detection system was a requirement of the initial PSD permit for demonstration of compliance with PM emission rates. No alternative to this compliance demonstration was provided in the application. Therefore, Specific Condition 58 will remain.

The case-by-case MACT requirements for SN-01 and SN-02 will remain. However, these requirements will no longer be applicable after the sources are complying with the applicable MACT rules. Therefore, the conditions pertaining to case-by-case MACT requirements have been updated clarifying that the case-by-case MACT requirements are no longer applicable after the facility begins complying with the applicable MACT rules.

The permitted emission increases include 8.5 tpy of PM and 11.5 tpy of PM<sub>10</sub>.

On August 1, 2013, the Department received a letter from AEP requesting clarification of the CO limit for SN-01. The BACT limit specified in Specific Condition 5 has a CO limit based on a 30-day rolling average. However, Specific Condition 1 does not contain a clarification that the 900 lb/hr limit is a 30-day rolling average. The 30-day rolling average is being added as a footnote to Specific Condition 1 as originally intended.

An administrative amendment application was submitted on September 9, 2013 to include various activities to the facility's insignificant activities list. These activities include:

- Two (2) 10,000 gallon sulfuric acid tanks;
- A 10,000 gallon sodium hypochlorite tank;
- A 5,000 gallon sodium hypochlorite tank;
- A 1,500 gallon sodium bromide tank;
- A 11,0000 gallon coagulant tank;
- A 1,500 gallon corrosion inhibitor/phosphoric acid tank,
- A 30,000 gallon anhydrous ammonia tank;
- Water washing activities of empty 55 gallon drums; and
- 15 containers of 5 gallons or less that do not emit any detectable VOCs or HAPs when closed.

An administrative amendment application was submitted on December 16, 2013 to add a 4,800 gallon sulfuric acid tank to the permit's insignificant activity list. Both administrative amendment applications were approved and combined with the Title V Renewal.

7. COMPLIANCE STATUS:

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

The inspector conducted an inspection on June 4, 2014. The following was noted in the inspection report:

A deviation of Plantwide Condition 1 is an area of concern during this inspection. Plantwide Condition 1: The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate.

The facility failed to notify ADEQ when the SN-TK-01, Gasoline Storage Tank, was installed and put into use. SN-TK-01 was already permitted but was not put into use until February 19, 2014. During the previous inspection and reporting period, the tank was not installed or in use. All ACC and SAM reports were correct due to the reporting period ending January 31, 2014. The facility is keeping the required rolling 12-month total of gasoline. A letter was drafted to ADEQ on June 10, 2014 to notify ADEQ of the installation of SN-TK-01, gasoline storage tank.

8. PSD 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? Y
- *Single pollutant  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list*

If yes, explain why this permit modification is not PSD.

This permit decision did not involve a significant modification under 40 CFR Part 52.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
01	all	PSD
	HAPs	40 CFR 63.43 case by case MACT (112(g))
	HAPs	40 CFR Part 63, Subpart UUUUU
	PM, SO <sub>2</sub> , NO <sub>x</sub>	40 CFR Part 60, Subpart Da
02	all	PSD
	HAPs	40 CFR 63.43 case by case MACT (112(g))
	HAPs	40 CFR Part 63, Subpart DDDDD
	NO <sub>x</sub>	40 CFR 60, Subpart Db
03	all	PSD
	PM, fuel specifications	40 CFR 60, Subpart IIII
	N/A	40 CFR 63, Subpart ZZZZ
04	PM, fuel specifications	40 CFR 60, Subpart IIII
EP-01 through EP-10, EP-12 TP-11, TP-16 and TP-20	opacity	40 CFR 60, Subpart Y

10. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

11. AMBIENT AIR EVALUATIONS:

a) Reserved.

b) Non-Criteria Pollutants:

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

1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m<sup>3</sup>), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Acetaldehyde	44.05	4.954	0.24	Y
Acrolein	0.229	0.025	0.13	N
Antimony	0.5	0.055	0.15	N
Arsenic	0.01	0.001	0.52	N
Benzene	1.597	0.176	1.21	N
Benzyl Chloride	5.177	0.569	0.27	N
Beryllium	0.002	0.00022	0.02	N
1,3-Butadiene	4.425	0.487	0.03	Y
Cadmium	0.01	0.001	0.03	N
Carbon Disulfide	31.141	3.426	0.05	Y
Chloroform	48.826	5.371	0.03	Y
Chromium	0.5	0.055	0.19	N
Chromium VI	0.05	0.006	0.06	N
Cobalt	0.2	0.002	0.04	N
Cyanide	5.19	0.571	0.94	N

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Dichlorobenzene	60.127	6.614	0.01	Y
Dimethyl Sulfate	0.516	0.057	0.02	Y
Dioxins & Furans	0.001	0.0001	0.01	N
Formaldehyde	18.421	2.026	0.16	N
Hexane	1762.372	193.861	1.56	Y
Hydrogen Chloride	2.983	0.328	3.60	N
Hydrogen Fluoride	0.409	0.045	1.20	N
Lead	0.05	0.006	0.1060	N
Manganese	0.2	0.022	1.12	N
Mercury	0.025	0.003	0.010340	N
Methyl Hydrazine	0.019	0.002	0.07	N
Nickel	0.1	0.011	0.12	N
Phenol	19.245	2.117	0.01	Y
Phosphorous	0.1	0.011	2.40	N
POM	0.2	0.022	0.04	N
Propionaldehyde	47.526	5.228	0.15	Y
Selenium	0.2	0.022	0.25	N
Sulfuric Acid	0.2	0.022	25.20	N
Toluene	188.405	20.725	0.87	Y
2,2,4- Trimethylpentane	1401	154	0.21	Y
Xylene	434.192	47.761	0.21	Y
Ammonia	17.413	1.91	37.50	N

2<sup>nd</sup> Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the

property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL ( $\mu\text{g}/\text{m}^3$ ) = 1/100 of Threshold Limit Value	Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )	Pass?
Acrolein	2.3	5.38E-04	Y
Antimony	5	7.43E-04	Y
Arsenic <sup>1</sup>	0.1	0.001	Y
Benzene	15.971	13.92155	Y
Benzyl Chloride	16	1.3E-03	Y
Beryllium	0.02	3.9E-05	Y
Cadmium	0.02	9.02E-05	Y
Chromium	5	8.58E-04	Y
Chromium VI	0.5	2.49E-04	Y
Cobalt	0.2	1.26E-04	Y
Cyanide	51.9	4.64E-03	Y
Dioxins & Furans	0.01	5E-05	Y
Formaldehyde	15	6.48E-04	Y
Hydrogen Chloride	29.8	0.0861	Y
Hydrogen Fluoride	24.6	0.0267	Y
Lead	0.5	7.74E-04	Y
Manganese	2.0	5.5E-03	Y
Mercury	0.1	1.97E-04	Y
Methyl hydrazine	0.19	3.16E-04	Y
Nickel	1.0	5.25E-04	Y
Phosphorous	1.0	1.19E-02	Y
POM	0.02	8.0E-05	Y
Sulfuric Acid <sup>1</sup>	2.0	1.19E-01	Y
Selenium	2.0	1.19E-03	Y



Pollutant	PAIL ( $\mu\text{g}/\text{m}^3$ ) = 1/100 of Threshold Limit Value	Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )	Pass?
Ammonia <sup>1</sup>	174	0.18575	Y

There were no permitted emission HAP increases with this Title V Renewal that would have required modeling. Therefore, the results are from previous permitting decisions, see Air Permit 2123-AOP-R0 and Air Permit 2123-AOP-R1.

Other Modeling:

Odor:

H<sub>2</sub>S 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 H<sub>2</sub>S Standards Y  
 If exempt, explain: No H<sub>2</sub>S emissions

12. CALCULATIONS:

SN	Emission Factor Source	Pollutant	Emission Factor	Control Equipment	Control Equipment Efficiency	Comments
01	BACT	PM/PM <sub>10</sub> (filterable)	0.012 lb/MMBtu	Baghouse	99.9	
		PM/PM <sub>10</sub> (total)	0.025 lb/MMBtu	Baghouse	99.9	
		SO <sub>2</sub>	0.08 lb/MMBTU 0.065/lbMMBTU	Dry Flue Gas Desulfurization	80-90+	
		VOC	0.00078 lb/MMBtu	Proper Design/Operation		
		CO	0.15 lb/MMBtu	Proper Design/Operation		
		NO <sub>x</sub>	0.067 lb/MMBTU/0.05 lb/MMBTU annual	SCR	70-90	
		Pb	1.6E-5 lb/MMBtu	Baghouse	99.9	
		H <sub>2</sub> SO <sub>4</sub> Mist	0.0042 lb/MMBtu	DFGD with Baghouse		

SN	Emission Factor Source	Pollutant	Emission Factor	Control Equipment	Control Equipment Efficiency	Comments
02	BACT	PM (total)	0.004 lb/MMBTU	Natural Gas Combustion		
		SO <sub>2</sub>	0.0006 lb/MMBtu	Natural Gas Combustion		
		VOC	0.0055 lb/MMBtu	Proper Design/Operation		
		CO	0.036 lb/MMBTU	Proper Design/Operation		
		NO <sub>x</sub>	0.11 lb/MMBtu	Low NO <sub>x</sub> Burner and Flue Gas Recirculation		
		Pb	N/A	Natural Gas combustion		
03 and 04	BACT	NO <sub>x</sub> + NMHC	6.4 g/kWh	Proper Design/Operation Low Sulfur Diesel 100 hrs/yr		
		SO <sub>2</sub>	0.007 g/kWh			
		PM	0.2 g/kWh			
		CO	3.5 g/kWh			
EP-01 – EP-10, TP-16, TP-20	AP-42	PM/PM <sub>10</sub>	various	Water and Surfactant Spray		
EP-12	Design	PM/PM <sub>10</sub>	0.01 gr/dscf	filter		
TP-22 TP-23	design	PM/PM <sub>10</sub>	9.4E-05 lb/ton	none		
EP-15 - EP-18 EP-21 - EP-25	Design	PM/PM <sub>10</sub>	0.01 gr/dscf	filter		
F-01 – F-03, F-05, F-06	EPA Guidance	PM/PM <sub>10</sub>	3.9 lb/day/acre	None	N/A	
F-04	AP-42	PM/PM <sub>10</sub>	lb/day/acre 1.0 PM 0.5 PM <sub>10</sub>	Water Spray	75%	Maximum of 26 acres
CT-01	BACT	Drift rate	0.0005%	Drift Eliminators	N/A	
RD-01	AP-42	PM/PM <sub>10</sub>	1.07 lb/VMT	Watering and chemical suppression	90	
TK-01	TANKS	VOC	Varies	N/A	N/A	Based on 25,000 gallons of gasoline per year.

13. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01	VOC PM/PM <sub>10</sub> HF HCl H <sub>2</sub> SO <sub>4</sub> Ammonia Lead (Pb)	various	annual	BACT/NSPS/ Verify Emission Rates
01	Other Non-Criteria	TBD	Once	Verify Emission Rates/MACT
02	PM CO	various	Once	NSPS/MACT
	NO <sub>x</sub>	7E	Initial and once every five years.	Verify emission rates
EP-01 through EP-10, and EP- 12	Opacity	Method 9	Initial	NSPS

14. 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)
01	Opacity CO NO <sub>x</sub> SO <sub>2</sub> CO <sub>2</sub> Mercury	COMS CEMS	Continuous	Y
01	Bag Leaks	Bag Leak Detector	Continuous	Y

## 15. 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)
01	Mercury Emissions	1.7 lb/TBtu per 12-month period	Monthly	Y
01	Bag Leak Detector Readings	None specified	Monthly	Y
01	BTU input	6000 MMBtu/hr 24-hour average	Continuous	Y
01	SO <sub>2</sub> emissions	0.065 lb/MMBtu (30-day rolling average)	Monthly	Y
		480.0 lb/hr (24-hr rolling average)	Monthly	Y
01	NO <sub>x</sub> emissions	0.067 lb/MMBtu (24-hr rolling average normal operations)	Monthly	Y
		420.0 lb/hr (24-hr rolling average)	Monthly	Y
		0.05 lb/MMBtu (12-month rolling average)	Monthly	Y
01	CO	0.15 lb/MMBtu (30-day rolling average)	Monthly	Y
02	Fuel Used	272.1 MMscf/12 month	Monthly	Y
03	Hours of operation	500 per year	Monthly	Y
04	Hours of operation	100 per year	Monthly	Y
F-04	Maximum area of the inactive coal piles	26 acres	Semi-annually	Y
F-06	Maximum area of the solid waste disposal area	50 acres	Semi-annually	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
CT-01	Total Dissolved Solids (TDS)	750 ppm	Weekly	Y
TK-01	Gasoline throughput	25,000 gallons per 12-month	Monthly	Y
Welsh Unit 2	SO <sub>2</sub> emissions	2,165 lb/hr (24-hr rolling average)	Semi-annually	Y

16. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01	10	Good Operations	COM
02	10	Good Operations	COM
03	20% in acceleration mode 15% in Lugging mode 50% during peaks (as measured according to 40 CFR 86, Subpart I)	Good Operations	Method 9
04	20	Dept. Guidance	Weekly observations
SN-EP-01 through EP-10, EP-12, TP-16, and TP-19 through TP-20	20	NPS	Method 9
SN-TP-22	20	Dept. Guidance	Daily Observations
EP-15 through EP-25	10	Dept. Guidance	Weekly observations
SN-F-01 through F-06	10	Dept. Guidance	Weekly observations

17. DELETED CONDITIONS:

Former SC	Justification for removal
	N/A

## 18. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Diesel or Propane Space Heaters (20 Total)	A-1	0.002	1.1E-05	0.0036	0.025	0.09	0.0036	0.0036
10,000 gallon Diesel Storage Tanks (3 Total)	A-3			0.005			0.005	0.005
700 gallon Diesel Storage Tank	A-3			0.0001			0.0001	0.0001
572 gallon Diesel Storage Tank	A-3			0.0002			0.0002	0.0002
Boiler Feed Pump Lube Oil Reservoir (2,906 gal)	A-3			0.0008			0.0008	0.0008
10,000 gallon Sulfuric Acid Tanks (2 total)	A-4							
4,800 gallon Sulfuric Acid Tank	A-4							
10,000 gallon Sodium Hypochlorite Tank	A-4							
5,000 gallon Sodium Hypochlorite Tank	A-4							
1,500 gallon Sodium Bromide Tank	A-4							
11,100 gallon Coagulant Tank	A-4							
1,500 gallon Corrosion Inhibitor/Phosphoric Acid Tank	A-4							
30,000 gallon Anhydrous Ammonia Tank	A-4							
Emissions from laboratory equipment & vents	A-5	No VOCs are used in the plant's laboratory.						

Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
Water washing activities of empty 55 gallon drums	A-6							
5 gallon Gasoline Containers (15 total)	A-8							
Turbine Lube Oil Storage Tank (16,800 gal)	A-13			0.007			0.007	0.007
Turbine Lube Oil Reservoir and Storage Tank (11,624 gal)	A-13			0.03			0.003	0.003

19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
2123-AOP-R2





APPENDIX A – EMISSION CHANGES AND FEE CALCULATION



**Fee Calculation for Major Source**

Revised 08-25-14

Facility Name: American Electric Power Service Corporation (John W. Turk Jr. Power Plant)  
 Permit Number: 2123-AOP-R3  
 AFIN: 29-00506

\$/ton factor	23.89	Annual Chargeable Emissions (tpy)	<u>4454.38</u>
Permit Type	Modification	Permit Fee \$	<u>1000</u>

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	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	8.5
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 condensable 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		800.95	809.45	8.5	8.5	809.45
PM <sub>10</sub>		731.7	743.4	11.7		
SO <sub>2</sub>		2102.7	2102.7	0	0	2102.7
VOC		22.5	22.5	0	0	22.5
CO		3949.9	3949.9	0		
NO <sub>x</sub>		1334.3	1334.3	0	0	1334.3
Acetaldehyde*	<input type="checkbox"/>	0.96	0.96	0		
Acrolein*	<input type="checkbox"/>	0.5	0.5	0		
Antimony**	<input type="checkbox"/>	0.66	0.66	0		
Arsenic**	<input type="checkbox"/>	2.25	2.25	0		
Benzene*	<input type="checkbox"/>	2.19	2.19	0		
Benzyl Chloride*	<input type="checkbox"/>	1.15	1.15	0		
Beryllium**	<input type="checkbox"/>	0.05	0.05	0		
1,3-Butadiene*	<input type="checkbox"/>	0.03	0.03	0		
Cadmium**	<input type="checkbox"/>	0.09	0.09	0		
Carbon Disulfide**	<input type="checkbox"/>	0.22	0.22	0		
Chloroform*	<input type="checkbox"/>	0.1	0.1	0		
Chromium**	<input type="checkbox"/>	0.77	0.77	0		
Chromium VI**	<input type="checkbox"/>	0.23	0.23	0		
Cobalt**	<input type="checkbox"/>	0.13	0.13	0		
Cyanide**	<input type="checkbox"/>	4.11	4.11	0		
Dichlorobenzene*	<input type="checkbox"/>	0.01	0.01	0		
Dimethyl Sulfate*	<input type="checkbox"/>	0.08	0.08	0		
Dioxins & Furans	<input type="checkbox"/>	0.01	0.01	0		
Formaldehyde*	<input type="checkbox"/>	0.44	0.44	0		
Hexane*	<input type="checkbox"/>	0.42	0.42	0		
Hydrogen Chloride	<input checked="" type="checkbox"/>	15.77	15.77	0	0	15.77
Hydrogen Fluoride	<input checked="" type="checkbox"/>	5.26	5.26	0	0	5.26
Lead**	<input type="checkbox"/>	0.43	0.43	0		
Manganese**	<input type="checkbox"/>	4.81	4.81	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Mercury	<input type="checkbox"/>	0.044735	0.044735	0		
Methylhydrazine*	<input type="checkbox"/>	0.28	0.28	0		
Nickel**	<input type="checkbox"/>	0.47	0.47	0		
Phenol*	<input type="checkbox"/>	0.03	0.03	0		
Phosphorous**	<input type="checkbox"/>	10.51	10.51	0		
POM*	<input type="checkbox"/>	0.07	0.07	0		
Propionaldehyde*	<input type="checkbox"/>	0.63	0.63	0		
Selenium**	<input type="checkbox"/>	1.06	1.06	0		
Sulfuric Acid	<input type="checkbox"/>	110.4	110.4	0		
Toluene*	<input type="checkbox"/>	0.04	0.04	0		
2,2,4-Trimethylpentane	<input type="checkbox"/>	0.01	0.01	0		
Xylene*	<input checked="" type="checkbox"/>	0.03	0.03	0		
Ammonia	<input type="checkbox"/>	164.4	164.4	0	0	164.4