STATEMENT OF BASIS

For the issuance of Air Permit # 0039-AOP-R19 AFIN: 60-00003

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

3M Company— 3M Industrial Mineral Products Division
3110 Walters Drive
Little Rock, Arkansas 72206

3. PERMIT WRITER:

Alexander Sudibjo

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Clay and Ceramic and Refractory Minerals Mining
NAICS Code: 212325

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
3/18/2025	Modification	N/A
7/29/2025	Renewal	Added lab ovens
8/25/2025	Modification	Dryer drum replacement (SN-108)

6. REVIEWER'S NOTES:

In this renewal, the facility is making the following changes:

- Update the emission factors for the following sources: conveyors (SN-10, SN-20, SN-58, SN-101, SN-106, SN-124, SN-153), baghouses (SN-108, SN-111, SN-112, SN-113, SN-211), crusher (SN-09), filler (SN-105), stockpiles (SN-17, SN-57, SN-303, SN-307, SN-308, SN-451, SN-452), truck loading (SN-301, SN-313), truck traffic (SN-55, SN-306), mixer scrubbers (SN-114, SN-128, SN-129), gasoline tanks (SN-444, SN-445), emergency engines (SN-446, SN-447).

- Replace the rotary dryer drum on Dryer No. 1 (SN-108). This replacement meets the definition of reconstruction and is subject to NSPS UUU.
- Correct the engine rating for SN-446 to 70 kW (94 HP).
- Update the emission limits for SN-102, SN-103, SN-104, SN-116, SN-156, SN-157, SN-158, SN-159, SN-160, SN-170, SN-171, SN-172, SN-189, SN-194, SN-214, and SN-306 to be based on controlled emissions.
- Add five Lab Ovens as A-5 insignificant activities. The DEQ determined that the lab ovens are not subject to NSPS UUU.
- Remove SN-169 from the permit. This source is retired and no longer at the site.
- Add NESHAP CCCCCC requirements for SN-444 and SN-445 back into the permit.
- Add NSPS OOO requirements to the permit.

There are no changes to the throughput or physical operation at the facility. The facility's permitted annual emissions are increasing by 1.10 tpy CO. The facility's permitted annual emissions are decreasing by 188.49 tpy PM, 82.13 tpy PM_{10}, and 0.2 tpy SO_2, 0.07 tpy VOC, and 0.27 tpy NOx.

7. COMPLIANCE STATUS:

As of March 18, 2025, there are no compliance issues with the facility. ECHO (https://echo.epa.gov/detailed-facility-report?fid=110040995199&ej_type=EJ) shows no violation identified as of April 22, 2025.

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?

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. 3M reviewed past applications and determined that the emission factor corrections would not have retroactively triggered PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-05, SN-06, SN-07, SN-08, SN-09, SN-10, SN-11, SN-12, SN-13, SN-15, SN-18, SN-19, SN-20, SN-28, SN-29, SN-30, SN-31, SN-32, SN-33, SN-59, SN-101,	PM	NSPS OOO

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-102, SN-103, SN-104, SN-105, SN-106, SN-107, SN-108, SN-153, SN-156, SN-157, SN-183, SN-184, SN-211, SN-212, SN-213, SN-214, SN-301, SN-450		
SN-108	PM, Opacity	NSPS UUU
SN-444 & SN-445	N/A	NESHAP CCCCCC
SN-446	NO_X and CO	NSPS JJJJ and NESHAP ZZZZ
SN-447	Source	NESHAP ZZZZ

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? 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
115, 154, 155	PM_{10}	Controlled by scrubber: > 70 gpm liquid flow rate (continuous)
114, 128, 129	PM_{10}	Controlled by scrubber: > 60 gpm liquid flow rate (continuous)
108, 111, 112, 113, 116, 211, 214	PM_{10}	Controlled by baghouse: 5% visible emissions limit (daily)

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 Department 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 Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m^3), 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?
Antimony	0.5	0.055	2.09E-06	Y
Arsenic	0.01	0.0011	7.44E-06	Y
Beryllium	0.01	0.0011	2.99E-06	Y

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Cadmium	0.01	0.0011	8.84E-06	Y
Chromium	0.5	0.055	8.92E-03	Y
Cobalt	0.02	0.0022	2.82E-04	Y
Lead	0.05	0.055	6.24E-05	Y
Manganese	0.2	0.022	3.34E-03	Y
Mercury	0.01	0.0011	3.68E-06	Y
POM	0.2	0.022	2.29E-05	Y
Selenium	0.2	0.022	1.61E-06	Y
Vinyl Acetate	35.21	3.87	0.72	Y

c) H_2S 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_2S Standards Y
If exempt, explain: the facility does not have H_2S emissions.

15. CALCULATIONS:

Operational flexibility is maintained at the Arch Street quarry by overestimating some emissions from the stone processing operations. Emission rates from all equipment are calculated at maximum equipment capacities assuming that they are only controlled with wet suppression. Emissions for the baghouse control device, which is frequently used, were also estimated. This allows for numerous possibilities of equipment configuration. Emissions at Arch Street are dependent on a limited annual throughput.

College Station emissions are based on continuous annual operation at equipment rated maximum capacity except emissions that result from fuel oil combustion at the dryers and kilns. These sources may use natural gas year-round but only a limited annual amount of fuel oil is permitted. The tons per year values listed for these sources in this permit are the sum of the potential natural gas emissions and the limited fuel oil emissions. The lb/hr emissions listed are the worst case of either oil or gas.

Another variable operating scenario at the College Station plant involves the transport of material from the pugmills in the crushing and screening area to various stockpiles. The two alternatives are truck transport and a conveyerized transport system. Emissions have

been estimated both ways and are double counted in this permit to provide maximum flexibility.

Some permit emission rates are higher than the emission rates if calculated using the current AP-42 emission factors. This is because 3-M requested to be permitted at rates listed in previous permits which are based on older factors.

All HAPs are calculated as a weight fraction of particulate matter. Weight fractions for the "naturally occurring" HAPs were determined from independent testing done on dust collected from various points at the 3M facility. See application information for specific test results. HAP weight fractions from the pigment usage are determined by calculating the pigment HAP fractions resulting in the finished product. This is done by applying the amount of HAPs that are in a specific amount of pigment to the amount of product that the amount of pigment will color. It is assumed that the dust resulting at and down stream from the coloring area will contain the same HAP weight fraction as the colored product. Compliance mechanisms are in place to verify the factors used for pigment HAP emission rates. The calculation attachment includes the HAP weight fractions used to determine naturally occurring HAP emissions. Those weight fractions were determined from independent testing.

Emissions from SN-108, SN-111, SN-112, SN-113, and SN-116 are from EPA AP-42, Section 1.3, Table 1.3-1. Emissions from SN-101 thru SN-106, SN-124, SN-153, SN-156, SN-157, SN-215, SN-216, FS-312, and FS-313 are from EPA AP-42, Chapter 11.19.2. Emissions from FS-308 are from EPA AP-42, Section 13.2.4, Table 13.2.4-1. HAPs emissions calculations from these sources when combusting used oil are based on the testing.

Emissions from SN-115, SN-154, and SN-155 slate oil and adhesion promoter were historically assumed to be insignificant and were previously not quantified. VOC and HAP emissions were based on MSDS information, EPA Method 24 analyses, and engineering tests. The calculations included a 20% safety factor. The emissions are based on worse case of the two processes (existing and new with DREW) and limited to a combined total tpy for VOC (38.0 tpy) and methanol (9.5 tpy).

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Conveyor TPs (05, 10, 11, 12, 13, 15, 18, 19, 20, 28, 29, 58, 59, 107, 156, 157, 158, 159,	AP-42, 11.19 Conveyor Transfer Points & site-specific data	PM/PM_{10}	Wet Suppression	0%	Uses controlled EF with 0% control

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
160, 161, 162, 163, 164, 165, 166, 170, 171, 172, 173, 174, 175, 183, 184, 194, 195, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 212, 213, 215, 216, 300, 302, 310, 448, 449)					
Screens (06, 08, 30, 32)	AP-42, 11.19 Screening & site-specific data	PM/PM_{10}	None	N/A	
Crushers (07, 09, 31, 33, 450)	AP-42, 11.19 Fines Crushing & site-specific data	PM/PM_{10}	Wet Suppression	0%	Uses controlled EF with 0% control
Stockpiles (17, 57, 303, 307, 308, 451, 452)	AP-42, 13.2 & site-specific data	PM/PM_{10}	None	N/A	4 MPH wind speed 2.1% moisture
Conveyors (101, 106, 124, 153)	AP-42, 11.19 Conveyor Transfer Points & site-specific data	PM/PM_{10}	Baghouse	99.0%	Uses uncontrolled EF with 99.0% control
Baghouses (102, 103, 104, 117, 118, 119)	Baghouse airflow	PM/PM_{10}	Baghouse	99.0%	
Filler (105)	AP-42, 11.19 Screening & site-specific data	PM/PM_{10}	Baghouse	99.0%	Uses uncontrolled EF with 99.0% control
Baghouses (108, 111, 112, 113, 211)	Baghouse grain loading	PM/PM_{10}	Baghouse	99.9%	Uses uncontrolled EF with 99.0% control

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	& site-specific data				
NG Combustion (108, 111, 112, 113, 116, 211)	AP-42, 1-4 Low NOx Burners	in lb/MMBtu 5.88E-04 SO_2 5.39E-03 VOC 8.24E-02 CO 9.80E-02 NOx	None	N/A	108: 70 MMBtu/hr 111, 112, 113: 54 MMBtu/hr 116: 30 MMBtu/hr
Scrubbers (114, 128, 129)	Site-specific tests	PM/PM_{10} VOC	Scrubber	98% HAPs	
	AP-42, 1-4 Low NOx Burners	in lb/MMBtu 5.88E-04 SO_2 8.24E-02 CO 4.90E-02 NOx	None	N/A	1 MMBtu/hr each
Cooler Scrubbers (115, 154, 155)	Site-specific tests	PM/PM_{10} VOC	Scrubber	98% HAPs	
Bucket Elevators (186, 187, 188, 189, 190)	AP-42, 11.19 Conveyor Transfer Points & site-specific data	PM/PM_{10}	None	0%	Uses controlled EF with 0% control
Baghouse (214)	Stack Test	PM/PM_{10}	Baghouse	99.0%	
Truck Traffic (55, 306)	Confidential	PM/PM_{10}	Wet Suppression	75%	
Loading (301, 313)	Confidential	PM/PM_{10}	None	N/A	
Gasoline Tanks (444, 445)	TANKS	VOC	None	N/A	444: 500 gal 445: 200 gal
Emergency Engines (446, 447)	AP-42, 3.2-3 4SRB	in lb/MMBtu 1.94E-02 $PM/PM_{10}/PM_{2.5}$ 5.88E-04 SO_2 3.72 CO 2.27 NO_X 2.96E-02 VOC	None	N/A	446: 1.02 MMBtu/hr 447: 1.29 MMBtu/hr

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
101, 102, 103, 104, 105, 106, 108, 153, 214	PM	Method 5 or Method 17	Initial	40 C.F.R. § 60.672(a)
05, 06, 07, 08, 09, 10, 11, 12, 13, 15, 18, 19, 20, 28, 29, 30, 31, 32, 33, 59, 107, 156, 157, 211, 212, 213, 450	Opacity	Method 9	Every 5 years	40 C.F.R. § 60.672(b)

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)
N/A				

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)
01-58	Arch Street throughput	3 MM tons/yr		monthly	Y
108, 111-113, 116	diesel fuel/used oil	2.5 MM gal/yr combined		monthly	Y
	diesel sulfur content used oil sulfur content HAPs constituent	0.3% by weight 0.33% by weight See Specific Condition #33		per delivery	Y
pigment application and subsequent sources	record of product labels, MSDS sheets, analysis of heavy metal content in product, or calculated content based on composition of pigments used by the facility	lead compounds	0.024 lb/ton (.0012% by weight)	per pigment material change	Y
		chromium compounds	6.5 lb/ton (0.325% by weight)		
		manganese compounds	0.3 lb/ton (0.015% by weight)		

SN	Recorded Item	Permit Limit		Frequency	Report (Y/N)
		cobalt compounds	4 lb/ton (0.2% by weight)		
115, 154, 155	scrubber liquid flow	70 GPM each		Daily	N
	Annual bubbled limits	VOC – 38.0 tpy Methanol – 9.5 tpy		Monthly	N
	Slate oil, Adhesion promoters and DREW composition limits. Records of MSDS sheets, product labels, EPA Method 24 analyses, engineering tests, or calculations using Department approved methodology	Methanol – 1.39 lb/gal (16.14% by weight) Toluene – 0.02 lb/gal (0.24% by weight)		Per material change	N
114, 128, 129	scrubber liquid flow	100 GPM each		Daily	N
444, 445	Gasoline throughput	10,000 gallons/month		Monthly	N
07, 09, 450	Opacity	12%		Weekly	N
115, 154, 155, 114, 128, 129, 171, 172, 184, 216, 448, 449		20%		Weekly	N
03, 156, 157, 175, 183, 215, 310		40%		Weekly	N
156, 157, 212, 213		7%		Weekly	N
101-106, 117-119, 124, 153		5%		Weekly	N
108, 111, 112, 113, 116, 211, 214		5%		Daily	N
303, 307, 308		5%		Once per two weeks	N
446	Hours of operation	500		Calendar year	N
447	Hours of operation	500		Calendar year	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
07, 09, 450	12%	40 C.F.R. § 60.672(b)	Weekly observations & performance tests every 5 years
05, 10, 11, 12, 13, 15, 19, 20, 28, 29, and 59	7%	40 C.F.R. § 60.672(b)	

SN	Opacity	Justification for limit	Compliance Mechanism
06, 08			Wet suppression & performance tests every 5 years
18			
58	40%	Dept. guidance	Wet suppression
50-55			
131-135			
121-123, 186-189			
108, 111, 112, 113, 116, 211, and 214	5%	40 C.F.R. § 64	Daily observations
101-106, 117-119, 124, and 153	5%	Dept. guidance	Weekly observations
115, 154, 155	20%	Dept. guidance	Weekly observations
114, 128, 129			
171, 172, 216, 448, 449	20%	Dept. guidance	Weekly observations & wet suppression
175, 215, 310	40%	Dept. guidance	Weekly observations & wet suppression
156, 157, 183, 184, 212, 213	7%	40 C.F.R. § 60.672(b)	Weekly observations & performance tests every 5 years
190	20%	Dept. guidance	Wet suppression
303, 307	5%	Dept. guidance	Biweekly observations
308	5%	Dept. guidance	Biweekly observations & wet suppression
446, 447	20%	Dept. guidance	Inspector observations
453a/b, 454a/b/c	10%	40 C.F.R. § 60.732	Monthly observations

20. DELETED CONDITIONS:

Former SC	Justification for removal
59	The gas tanks do not have particulate emissions and should not have an opacity limit.

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
12,000 gal Diesel AST (CS6)	A-13			0.01				
22,000 gal slate oil AST (CS2)	A-13			0.03				
Tube Conveyor	A-13	0.013						

Source Name	Group A Category	Emissions (tpy)						
		PM/ PM_{10}	SO_2	VOC	CO	NO_x	HAPs	
							Single	Total
Loadout System	A-13	0.013						
100 gal Kerosene AST (AS19)	A-2			9.99E-05				
3,500 gal Used Oil AST (CS5)	A-3			3.65E-03				
1,000 gal Diesel AST (CS28)	A-3			1.04E-03				
1,000 gal Lube Oil AST (CS14)	A-3			1.07E-03				
1,000 gal Used Oil AST (CS15)	A-3			1.07E-03				
280 gal Used Oil AST (CS16)	A-3			2.35E-04				
430 gal Lube Oil AST (CS21)	A-3			4.67E-04				
200 gal Solvents AST (CS29)	A-3			8.54E-04				
300 gal Engine Oil AST (CS34)	A-3			2.61E-04				
8,000 gal Diesel AST (AS1)	A-3			0.02				
500 gal Motor Oil AST (AS18)	A-3			2.69E-03				
300 gal Hydraulic Oil AST (AS3)	A-3			3.06E-04				
300 gal Motor Oil AST (AS4)	A-3			3.06E-04				
300 gal Used Oil AST (AS12)	A-3			3.06E-04				
300 gal Lube Oil AST (AS24)	A-3			3.06E-04				
300 gal Lube Oil AST (AS25)	A-3			3.06E-04				
300 gal Lube Oil AST (AS26)	A-3			3.06E-04				
300 gal Diesel Fuel AST (AS33)	A-3			4.74E-04				
9,400 gal Diesel Fuel AST (AS35)	A-3			0.01				
8,000 gal DREW AST (CS)	A-3			2.37E-03				
Arch Street Quality Lab Oven #1	A-5	5.95E-04						
Arch Street Quality Lab Oven #2	A-5	5.95E-04						
C&S Tech Room Quality Lab Oven	A-5	6.54E-04						
Coloring/Shipping Quality Lab Oven #1	A-5	5.58E-04		0.2				

Source Name	Group A Category	Emissions (tpy)						
		PM/ PM_{10}	SO_2	VOC	CO	NO_x	HAPs	
							Single	Total
Coloring/Shipping Quality Lab Oven #2	A-5	5.58E-04		0.2				

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 #
0039-AOP-R18

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: 3M
Permit Number: 0039-AOP-R19
AFIN: 60-000003

$/ton factor	28.14	Annual Chargeable Emissions (tpy)	623.12
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)	-189.03
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		620.69	432.2	-188.49	-188.49	432.2
PM_{10}		392.46	310.33	-82.13		
$PM_{2.5}$		0	0	0		
SO_2		7.9	7.7	-0.2	-0.2	7.7
VOC		44.59	44.52	-0.07	-0.07	44.52
CO		330.56	331.66	1.1		
NO_X		138.97	138.7	-0.27	-0.27	138.7
Lead	☐	0.000274	0.000274	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Chromium	☐	0.0391	0.0391	0		
Manganese	☐	0.0146	0.0146	0		
Cobalt	☐	0.00123	0.00123	0		
Arsenic	☐	0.0000326	0.0000326	0		
Cadmium	☐	0.0000388	0.0000388	0		
Beryllium	☐	0.0000131	0.0000131	0		
Methanol	☐	9.5	9.5	0		
Toluene	☐	2.37	2.37	0		
Antimony	☐	0.00000914	0.00000914	0		
Benzene	☐	0.00239	0.00239	0		
Dichlorobenzene	☐	0.00137	0.00137	0		
Formaldehyde	☐	0.0906	0.0906	0		
Hexane	☐	2.05	2.05	0		
Mercury	☐	0.0000161	0.0000161	0		
Nickel	☐	0.000131	0.000131	0		
POM	☐	0.000101	0.000101	0		
Selenium	☐	0.00000706	0.00000706	0		
Vinyl Acetate	☐	3.15	3.15	0		
Total Combustion HAPs	☐	0.2	0.2	0		