

## STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0597-AOP-R22 AFIN: 02-00013

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Georgia-Pacific Consumer Operations LLC  
100 Mill Supply Road  
Crossett, Arkansas 71635

3. PERMIT WRITER:

John Mazurkiewicz

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Paper (except Newsprint) Mills  
NAICS Code: 322121

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
11/19/2020	Administrative Amendment	Removed Weak Black Liquor Storage Basin (SN-76F)

6. REVIEWER'S NOTES:

In addition to changes described in the permit, facility information has been updated and various formatting corrections have been made.

7. COMPLIANCE STATUS:

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

The last inspection was performed on July 8-10, 2019. No areas of concern were identified. A review of ECHO revealed one (1) CAA violation in the last twelve quarters.

Following an EPA inspection at the Georgia-Pacific Chemicals (02-00028) and Consumer Operations (02-00013) facilities in 2015, a Consent Decree was lodged on December 14, 2018 to address alleged violations of Sections 113(b) and 112(r)(1) of the Clean Air Act, 42 U.S.C. §§ 7413(b) and 7412(r)(1), and Arkansas Code Annotated §§ 8-4-103 et seq. In June of 2019, the facility announced it would be shutting down equipment and processes supporting the bleached board operations which resulted in the need for an Amended Consent Decree. An Amended Consent Decree was lodged on February 3, 2020 and had a 30-day public comment period. On June 5, 2020, the court entered the Amended Consent Decree resolving these violations.

On May 29, 2020, stack test results were submitted for emissions testing conducted on April 2, 2020. The results of the test indicated that the Tissue Machine No. 8 Dust System (SN-81) exceeded emissions limits for PM/PM<sub>10</sub>. In a letter dated October 21, 2020, DEQ indicated this case was proceeding through formal enforcement channels.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? *No*.  
If yes, were GHG emission increases significant? *N/A*.

b) Is the facility categorized as a major source for PSD? *Yes*.

- *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.

*This revision does not include any major modification as defined in 40 C.F.R. § 52.21.*

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-18, SN-19, and SN-22	HAP	NESHAP Subpart DDDDD
SN-45	HAP	NESHAP Subpart KK
SN-111, SN-112, SN-113, and SN-141	HAP	NESHAP Subpart JJJJ
SN-115, SN-116, SN-117, SN- 118, SN-119, and SN-120	HAP	NESHAP Subpart ZZZZ
SN-118 and SN-119	NMHC + NO <sub>x</sub> PM CO	NSPS Subpart IIII

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? *No.*

## 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
22	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	40 C.F.R. 64.2(b)(i) SN 22 is subject to 40 C.F.R. 63 Subpart DDDDD
50	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	Maintain a scrubber liquid flow rate of at least 300 gallons per minute and keep records daily.
81	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	Maintain a scrubber liquid pressure of at least 8 inches of water and keep records 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 ADEQ 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.

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 ( $\text{mg}/\text{m}^3$ ), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV ( $\text{mg}/\text{m}^3$ )	PAER (lb/hr) = $0.11 \times \text{TLV}$	Proposed lb/hr	Pass?
2,3,7,8-Tetrachlorodibenzo-p-dioxin	0.00004*	0.0000044	9.67E-08	Yes
2,4,6-Trichlorophenol	0.44	0.0484	2.00E-02	Yes
4,6-Dinitro-o-cresol	0.2	0.022	2.00E-02	Yes
Acetaldehyde	45.04	4.9544	2.80E+00	Yes
Acrolein	0.2293	0.0252	2.30E-01	No
Antimony	0.5	0.055	2.00E-02	Yes
Arsenic	0.01	0.0011	1.81E-02	No
Beryllium	0.00005	5.50E-06	7.49E-05	No
Cadmium	0.01	0.0011	6.72E-03	No
Chromium (III)	0.5	0.055	1.94E-02	Yes
Chromium (VI)	0.01	0.0011	4.16E-04	Yes
Cobalt	0.02	0.0022	1.18E-03	Yes
Hexachlorobenzene	0.002	0.0002	1.82E-03	No
Hexane	176.23	19.3853	4.63E+00	Yes
Hydrogen Fluoride	0.41	0.045	3.00E-02	Yes
Hydrogen Sulfide	1.39	0.1533	3.26E+01	No
Manganese	0.2	0.0220	1.60E-01	No
Mercury	0.025	0.0028	1.76E-03	Yes
Methanol	262.08	28.8288	6.37E+01	No
Pentachlorophenol	0.5	0.055	2.00E+00	Yes
Phosphorus	0.1	0.011	1.74E-01	No

Pollutant	TLV (mg/m <sup>3</sup> )	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
POM	0.2	4.08	3.95E+00	Yes
Selenium	0.2	0.022	2.00E+00	Yes

\* Cal EPA REL.

## 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 (µg/m <sup>3</sup> ) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m <sup>3</sup> )*	Pass?
Acrolein	2.293	0.02677	Yes
Arsenic	0.1	0.00179	Yes
Beryllium	0.0005	0.00001	Yes
Cadmium	0.1	0.00041	Yes
Hexachlorobenzene	0.02	0.00011	Yes
Hydrogen Sulfide	See H <sub>2</sub> S Modeling below		
Manganese	2	0.01027	Yes
Methanol	2620.8	410.91218	Yes
Phosphorus	1	0.01077	Yes

\* Modeled Concentrations are the result of modeling performed for the issuance of Permit #: 0597-AOP-R20. This revision does not include any permitted emission increases.

### c) 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? *No.*

Pollutant	Threshold value	Modeled Concentration* (ppb)	Pass?
H <sub>2</sub> S	20 parts per million (5-minute average)	16.42	Yes
	80 parts per billion (8-hour average) residential area	5.06	Yes
	100 parts per billion (8-hour average) nonresidential area	5.06	Yes

\* Sources permitted to emit hydrogen sulfide, except for the Waste Water Treatment System (SN-35), were modeled. Wastewater treatment systems are exempt from A.C.A. § 8-3-103. Permitted emissions at SN-35 have not been revised; however, emissions are expected to decrease following the shutdown of equipment and processes at the facility.

#### 15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc)	Emission Factor (lbs/ton, lbs/hr, etc)		Control Equipment	Control Equip. Efficiency	Comments
18,19	NG-AP42 Sec 1.4	PM/PM <sub>10</sub> SO <sub>2</sub> NO <sub>x</sub> Pb CO VOC	lb/MMscf 7.6 0.6 280 0.0005 84 5.5			A 20% safety factor has been applied to all factors/ SN-19 = 357 MMBTU SN-18 = 220 MMBTU
22	NG-AP42 Sec 1.4 720 MMBTU/hr	PM/PM <sub>10</sub> SO <sub>2</sub> VOC Pb NO <sub>x</sub> CO	lb/MMscf 7.6 0.6 5.5 0.0005 190 84			Scenario #1: Natural gas only Scenario #2: WW+NG Scenario #3: All fuels  Hourly max 1.5% S 30-day rolling 1.0% S  20% safety factor applied

SN	Emission Factor Source (AP-42, testing, etc)	Emission Factor (lbs/ton, lbs/hr, etc)		Control Equipment	Control Equip. Efficiency	Comments
	WW- AP42 Sec. 1.6 475.2 MMBTU/hr  Sludge 405.0 MMBtu/hr  RDF 104.2 MMBtu/hr	PM/PM <sub>10</sub> SO <sub>2</sub> VOC Pb NO <sub>x</sub> CO	lb/MMBTU 0.082 0.025 0.017 4.8E-5 0.22 0.6	Venturi scrubber	90% for particulate	
	TDF –NCASI TB 906 31.5 MMBTU/hr	PM/PM <sub>10</sub> SO <sub>2</sub>	lb/MMBTU 0.188 1.03			
	NCGs NCASI TB 849 Table 9	SO <sub>2</sub>	0.8 lb/ADTUBP			876 hours per year
35	NOCEPM model  Mass Balance Model developed by NCASI, 2010	VOC 151783 lb/yr TRS 515635.5 lb/yr				
45	VOC content and MSDS records	2.5E-2 lb/lb ink				70.97 lb ink/hr 341,450 lb ink/yr
47	BACT limit	PM/PM <sub>10</sub> = 0.0164 lb/MMBTU SO <sub>2</sub> = 0.0007 lb/MMBTU VOC = 0.0564 lb/MMBTU CO = 0.2142 lb/MMBTU NO <sub>x</sub> = 0.0913 lb/MMBTU Pb = 0.0005 lb/MMscf				21 MMBTU/hr
48	BACT limits and AP-42, Sec 1.4-2	PM/PM <sub>10</sub> = 0.00912lb/MMBTU SO <sub>2</sub> = 0.0007 lb/MMBTU VOC = 0.0066 lb/MMBTU CO = 0.1139 lb/MMBTU NO <sub>x</sub> = 0.0913 lb/MMBTU Pb = 0.0005 lb/MMscf				41 MMBTU/hr

SN	Emission Factor Source (AP-42, testing, etc)	Emission Factor (lbs/ton, lbs/hr, etc)	Control Equipment	Control Equip. Efficiency	Comments
79	BACT limits and AP-42, Sec 1.4-2	PM/PM <sub>10</sub> = 0.0164 lb/MMBTU SO <sub>2</sub> = 0.0007 lb/MMBTU VOC = 0.0192 lb/MMBTU CO = 0.15 lb/MMBTU NO <sub>x</sub> = 0.0913 lb/MMBTU Pb = 0.0005 lb/MMscf			41 MMBTU/hr  CO BACT limit based on 0.5 lb/MMBtu from the burners and 0.10 lb/MMBtu from the process emissions
49	AP-42 Table 1.4-2	PM/PM <sub>10</sub> = 7.6 lb/MMscf SO <sub>2</sub> = 0.6 lb/MMscf VOC = 5.5 lb/MMscf CO = 84 lb/MMscf NO <sub>x</sub> = 100 lb/MMscf NO <sub>x</sub> = 50 for SN-49 Pb = 0.0005 lb/MMscf			SN49 = 41 MMBTU/hr
75 D-I	NCASI TB 1020 Table 4.3  NCASI Air Toxics Database	VOC = 4.84 lb/hr/tank TRS = 0.533 lb/hr/tank 6 Tanks in all			
81 & 50	Manufacturer's specs	PM, SN-81=0.0035 gr/scf PM,SN-50 =0.46 lb/hr			
Paper Machine 5 thru 8 68,69,70, & 80	Mass balance for VOC  Stack testing (PM <sub>10</sub> )	VOC <sub>68</sub> = 3.37 VOC <sub>69</sub> = 2.48 VOC <sub>70</sub> = 1.78 VOC <sub>80</sub> = 1.29 (lb/ADTFP)  PM = 0.0646 (lb/ADTFP)			0.95 MDT = 1 ADTFP  SN68 = 97 MDT/day SN69 = 270 MDT/day SN70 = 250 MDT/day SN80 = 253.1 MDT/day
78F	AP 42 13.2.1 & 13.2.2	By calculation			
82F	LandGEM estimated emission rate (2021)	VOC = 0.83 tpy  However, permitted VOC set equal to Total HAPs			



SN	Emission Factor Source (AP-42, testing, etc)	Emission Factor (lbs/ton, lbs/hr, etc)	Control Equipment	Control Equip. Efficiency	Comments		
93	NCASI TB 649, Eq 7	0.073 lb VOC/ton broke However, permitted VOC set equal to Total HAPs			270 ton/broke/day		
102	AP42 Sec 13.2.4, Equation 1	PM <sub>10</sub> = 3.581E-04 lb/ton bark			101 = 779 ton/hr 102=829 ton/hr  U = 5.34 mph M = 40%		
111, 112, 113	VOC content and MSDS records	VOC = 0.17 lb/MDT			253.1 MDT/day		
115-120	AP-42, Table 3.3-1 and Table 3.3-2. (diesel)	PM <sub>10</sub> SO <sub>2</sub> VOC CO NO <sub>x</sub>	lb/hp-hr 0.0022 0.00205 0.00251 0.00668 0.031		Source 115 116 117 118 119 120	HP 420 420 420 138 138 88	
115ct, 116ct, 117 ct, & 144	Manufacturer's specs	6.3 lb/Mgal	Drift eliminators		115ct 116ct 117ct 123 144	<u>gpm</u> 12,500 12,500 12,500 15,000 4,836	<u>drift rate</u> 0.001% 0.001% 0.001% 0.001% 0.0005%
141	VOC content/glue usage	VOC = 1.7E-01 lb/MDT			790 MDT/day		
142 & 143	VOC content/material usage	VOC = 2.3E-01 lb/MDT			40,000 MDT/yr		

SN	Emission Factor Source (AP-42, testing, etc)	Emission Factor (lbs/ton, lbs/hr, etc)	Control Equipment	Control Equip. Efficiency	Comments
145	AP-42 Table 1.4-1 and 1.4-2	PM/PM <sub>10</sub> = 7.6 lb/MMscf SO <sub>2</sub> = 0.6 lb/MMscf VOC = 5.5 lb/MMscf CO = 84 lb/MMscf NO <sub>x</sub> = 100 lb/MMscf Pb = 0.0005 lb/MMscf			3.00 MMBtu/hr 1,020 Btu/scf 8760 hr/yr

## 16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
22	PM/PM <sub>10</sub>	5 with backhalf	5 yr	Confirm limits
	SO <sub>2</sub>	6		
	NO <sub>x</sub>	7E		
	CO	10	Annual	MACT
	HCl	26 or 26A		
	Hg	29, 30A, 30B or 101A or ASTM Method D6784		
47 & 48	NO <sub>x</sub>	7E	5 yr	BACT
	CO	10		
79	NO <sub>x</sub>	7E	5 yr	BACT
	CO	10	Within 180 days of issuance of Permit 0597-AOP-R18, and every 12 months thereafter	
81	PM/PM <sub>10</sub>	5 with backhalf	5 yr	BACT and confirm CAM parameters

## 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)
----	--	---------------------------------------	-----------	-----------------

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
22	Scrubber parameters	Flowmeter and pressure gauge	15 minute	N
	O <sub>2</sub>	CEM	Continuous	
52, 54, 50, 81	Scrubber parameters	Flowmeter and/or pressure gauge	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)
22	TDF	35 pounds per minute of TDF	Monthly	Y
	RDF	250 tons of RDF per day		
	Sludge	45 BDT sludge per hour		
	All other fuels fired, ADF and WW	200 tons of used oil absorbent material per month <25% creosote ties		
45	VOC	4.3 ton/yr	Monthly	Y
68	Paper Production	97 machine dried tons of paper per day, 30 day rolling average	Monthly	Y
	VOC emissions	57 ton/yr		
	BACT limit	3.37 lb/ADTFP		
69	Paper Production	270 machine dried tons of paper per day, 30 day rolling average	Monthly	Y
	VOC emissions	116.8 ton/yr		
	BACT limit	2.48 lb/ADTFP		
70	Paper Production	250 machine dried tons of paper per day, 30 day rolling average	Monthly	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	VOC emissions	77.4 ton/yr		
	BACT limit	1.78 lb/ADTFP		
79	SSM events	Information outlined in General Provision 8 and Specific Condition 203 (R18)	As necessary	Y
	Maintenance and inspection activities	Information outlined in Specific Condition 204 (R18)	As necessary	N
80	Paper Production	253.1 machine dried tons of paper per day, 30 day rolling average	Monthly	Y
	VOC emissions	59.6 ton/yr		
	BACT limit	1.29 lb/ADTFP		
93	Broke	270 tons/day of broke	Monthly	Y
111,112,113,	VOC	7.9 ton/yr	Monthly	Y
115ct,116ct,117ct, & 144	TDS	750 mg/L	Monthly	N
115-120	Hours of operation	500 hours per rolling 12 month period	Monthly	Y
141	VOC	24.6 ton/yr	Monthly	Y
145	NESHAP DDDDD Records	N/A	As necessary	N

## 19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
18,19	5%	Departmental Guidance	Use of NG
22	20% WW, other fuels	Reg 19	Daily observations

SN	Opacity	Justification for limit	Compliance Mechanism
	5% NG only		Use of NG
47,54,48, 52,49,50,79,81	5%	Departmental Guidance	Weekly observations or use of NG for fuel burning sources
68,69,70,80	0%	Departmental Guidance	Weekly Yes/No check outside building
115 through 120	20%	Reg 19	Daily observations once use exceeds 24-hrs
145	5%	Departmental Guidance	Use of NG

## 20. DELETED CONDITIONS:

Former SC	Justification for removal
5 and 6	These conditions were related to the Weak Black Liquor Storage Basin (SN-76) which has been removed from the permit.

## 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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
REYSMA Tissue Mill Cooling Tower	A-13	0.0166						
AP&L Substation Cooling Tower	A-13	0.0058						
Gasoline Tank	A-13			0.161				

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
Perini Towel Rewinder and Spectrum Towel Printer Baghouse	A-13	0.0135						
Mill Process Sewers	A-13						0.01	0.01
Total A-13		0.0359		0.161			0.01	0.01
Diesel Fuel Tank	A-3			0.00470				
Total A-3				0.00470				

## 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 #
0597-AOP-R21

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Georgia-Pacific Consumer Operations  
LLC  
Permit Number: 0597-AOP-R22  
AFIN: 02-00013

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	3348.62
Permit Type	AA	Permit Fee \$	0

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)	-52
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		435.4	435.4	0	0	435.4
PM <sub>10</sub>		409.2	409.2	0		
PM <sub>2.5</sub>		395.9	395.9	0		
SO <sub>2</sub>		266	266	0	0	266
VOC		795.6	743.6	-52	-52	743.6
CO		1938.4	1938.4	0		
NO <sub>x</sub>		1758.2	1758.2	0	0	1758.2



Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Pb**	<input type="checkbox"/>	0.2	0.2	0		
TRS	<input type="checkbox"/>	189.8	189.7	-0.1		
1,1,1-Trichloroethane**	<input checked="" type="checkbox"/>	0.1	0.1	0	0	0.1
1,1,2-Trichloroethane	<input type="checkbox"/>	0.01	0.01	0		
1,2,4-Trichlorobenzene	<input type="checkbox"/>	0.39	0.39	0		
1,2-Dichloroethane	<input type="checkbox"/>	0.27	0.27	0		
1,2-Dichloropropane	<input type="checkbox"/>	0.05	0.05	0		
1,3-Butadiene	<input type="checkbox"/>	0	0	0		
1,4-Dichlorobenzene	<input type="checkbox"/>	0.7	0.7	0		
2,3,7,8-tetrachlorodibenzo-p-dioxin	<input type="checkbox"/>	0.01	0.01	0		
2,4,6-Trichlorophenol	<input type="checkbox"/>	0.01	0.01	0		
2,4-Dinitrophenol	<input type="checkbox"/>	0.01	0.01	0		
2,4-Dinitrotoluene	<input type="checkbox"/>	0.01	0.01	0		
4-Nitrophenol	<input type="checkbox"/>	0.01	0.01	0		
4,6-Dinitro-o-cresol	<input type="checkbox"/>	0.02	0.02	0		
Acetaldehyde	<input type="checkbox"/>	10.2	2.52	-7.68		
Acetophenone	<input type="checkbox"/>	0.01	0.01	0		
Acrolein	<input type="checkbox"/>	0.33	0.33	0		
Antimony	<input type="checkbox"/>	0.01	0.01	0		
Arsenic	<input type="checkbox"/>	0.1	0.1	0		
Benzene	<input type="checkbox"/>	0.88	0.88	0		
Beryllium	<input type="checkbox"/>	0.01	0.01	0		
Bis(2-Ethylhexyl)phthalate	<input type="checkbox"/>	0.01	0.01	0		
Bromomethane	<input type="checkbox"/>	0.01	0.01	0		
Cadmium	<input type="checkbox"/>	0.08	0.08	0		
Carbon Disulfide	<input type="checkbox"/>	0.96	0.96	0		
Carbon Tetrachloride	<input type="checkbox"/>	0.03	0.03	0		
Chlorobenzene	<input type="checkbox"/>	0.1	0.1	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Chloroform	<input type="checkbox"/>	5.13	5.13	0		
Chloromethane	<input type="checkbox"/>	0.07	0.07	0		
Chromium (III)	<input type="checkbox"/>	0.1	0.1	0		
Chromium (VI)	<input type="checkbox"/>	0.01	0.01	0		
Cobalt	<input type="checkbox"/>	0.08	0.08	0		
Cumene	<input type="checkbox"/>	0.05	0.05	0		
Dibutyl phthalate	<input type="checkbox"/>	0.09	0.09	0		
Ethyl Benzene	<input type="checkbox"/>	0.17	0.17	0		
Formaldehyde	<input type="checkbox"/>	1.47	1.43	-0.04		
Hexachlorobenzene	<input type="checkbox"/>	0.01	0.01	0		
Hexane	<input type="checkbox"/>	13.34	13.34	0		
Hydrochloric Acid**	<input checked="" type="checkbox"/>	0.28	0.28	0	0	0.28
Hydrogen Cyanide	<input type="checkbox"/>	0.06	0.06	0		
Manganese	<input type="checkbox"/>	0.39	0.39	0		
Mercury	<input type="checkbox"/>	0.08	0.08	0		
Methanol	<input type="checkbox"/>	177.61	133.57	-44.04		
Methyl Chloride	<input type="checkbox"/>	0.05	0.05	0		
Methyl Isobutyl Ketone	<input type="checkbox"/>	1.34	1.23	-0.11		
Methylene Chloride**	<input checked="" type="checkbox"/>	0.5	0.5	0	0	0.5
Naphthalene	<input type="checkbox"/>	0.37	0.37	0		
n-Hexane	<input type="checkbox"/>	0.08	0.08	0		
Nickel	<input type="checkbox"/>	0.1	0.1	0		
Pentachlorophenol	<input type="checkbox"/>	0.01	0.01	0		
Phenol	<input type="checkbox"/>	1.75	1.75	0		
Phosphorus	<input type="checkbox"/>	0.25	0.25	0		
POM	<input type="checkbox"/>	0.61	0.61	0		
Propionaldehyde	<input type="checkbox"/>	1.7	1.7	0		
Selenium	<input type="checkbox"/>	0.01	0.01	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Styrene	<input type="checkbox"/>	0.13	0.13	0		
Tetrachloroethylene**	<input checked="" type="checkbox"/>	0.2	0.2	0	0	0.2
Tissue Mill Converting HAPs (Total HAPs)	<input type="checkbox"/>	4.22	4.22	0		
Toluene	<input type="checkbox"/>	0.85	0.85	0		
Trichloroethylene	<input type="checkbox"/>	0.1	0.1	0		
Vinyl Chloride	<input type="checkbox"/>	0.05	0.05	0		
Xylenes (mixed isomers)	<input type="checkbox"/>	0.2	0.2	0		
Acetone***	<input checked="" type="checkbox"/>	3	3	0	0	3
Ammonia***	<input checked="" type="checkbox"/>	0.25	0.25	0	0	0.25
Hydrogen Fluoride***	<input checked="" type="checkbox"/>	0.03	0.03	0	0	0.03
Hydrogen Sulfide***	<input checked="" type="checkbox"/>	141.01	141.01	0	0	141.01
Ozone***	<input checked="" type="checkbox"/>	0	0	0	0	0
Trichlorofluoromethane***	<input checked="" type="checkbox"/>	0.05	0.05	0	0	0.05