

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0957-AOP-R14 AFIN: 46-00005

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Cooper Tire & Rubber Company  
3500 East Washington Road  
Texarkana, Arkansas 71854

3. PERMIT WRITER:

Charles Hurt, P.E.

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Tire Manufacturing (except Retreading)  
NAICS Code: 326211

5. ALL SUBMITTALS:

| Date of Application | Type of Application<br>(New, Renewal, Modification,<br>Deminimis/Minor Mod, or<br>Administrative Amendment) | Short Description of Any Changes<br>That Would Be Considered New or<br>Modified Emissions |
|---------------------|---|---|
| 7/11/2016           | Administrative Amendment  | Included three unpermitted tanks (each tank insignificant)                                |

6. REVIEWER'S NOTES:

Cooper Tire & Rubber Company (AFIN: 46-00005) operates a tire manufacturing facility located at 3500 East Washington Road, Texarkana, AR 71854. Cooper submitted an application to include three existing tanks as insignificant activities and remove SN-117 from the GR-08 emission bubble in the emission summary table. Both changes qualified as administrative amendments. Cooper requested Plantwide Conditions #32.c and #32.g reference operation under an energy management program which the Boiler MACT allows as an alternative to conducting an energy assessment. That request was approved according Reg. 26.1013(C). Emission limits were not affected by any of the requested changes.

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 last inspected on February 3, 2015 and determined to be operating out of compliance. The following inspection concerns were noted:

*After a review of the Annual Compliance Certification and Semiannual Monitoring Report submitted on January 30, 2015, the following areas of concern were noted: SC#3: Shall not exceed 20% opacity for GR-01 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 3/16/14 to 3/22/14. SC#10: Shall not exceed 20% opacity for GR-03 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 1/5/14 to 1/11/14. SC#17: Shall not exceed 20% opacity for GR-04 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 1/5/14 to 1/11/14. SC#24: Shall not exceed 20% opacity for GR-05 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 1/5/14 to 1/11/14. SC#27: Shall not exceed 20% opacity for GR-06 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 1/5/14 to 1/11/14. SC#36: Shall not exceed 20% opacity for SN-07 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 3/16/14 to 3/22/14. SC#59: Shall not exceed 20% opacity for SN-59 and compliance kept with Plantwide 8. 1 weekly visible emission not performed on 3/16/14 to 3/22/14. SC#60: Shall not emit more than 3.8 lbs/hr of VOC from SN-67. Compliance shown through SC 61 and Plantwide 9. VOC emission limits were exceeded due to limits in SC 61 and Plantwide 9 being exceeded. SC#61: Shall not process in excess of 650 gallons of cement and 2000 gallons of solvent from SN-67 in a consecutive 12 month period. Gallons of cement used were exceeded in September 2014 and October 2014. Plantwide 8: Weekly visible emissions observations kept for GR-01, GR-02, GR-03, GR-04, GR-05, GR-06, SN 07, and SN-59. 1 weekly visible emission observation was not recorded for GR-01, GR-03, GR-04, GR-05, GR-06, SN 07, and SN-59. Plantwide 9: Shall not process in excess of 650 gallons of cement at SN-67 during consecutive 12 month period. The gallons of cement used in September were 671 gallons. The gallons of cement used in October were 675 gallons. These both violate the permit limit of 650 gallons.*

A CAO to address these concerns is being processed.

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? N  
· 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.

N/A

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

| Source            | Pollutant                   | Regulation<br>(NSPS, NESHAP or PSD) |
|-------------------|-----------------------------|-------------------------------------|
| GR-03 & GR-04     | All Listed                  | NSPS Subpart BBB                    |
| SN-89             | Opacity and SO <sub>2</sub> | NSPS Subpart Dc                     |
| SN-140 and SN-141 | HAP                         | NESHAP ZZZZ                         |

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 only new or modified source of HAP emissions with this permitting action are emergency fire pumps. Since the sources are operated infrequently an updated evaluation for HAPs is not necessary. The previous permit evaluation (below) is provided solely for reference and was not used in this current permitting action.

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<br>(mg/m <sup>3</sup> ) | PAER (lb/hr) =<br>0.11 × TLV | Proposed<br>lb/hr | Pass? |
|-----------------------------|-----------------------------|------------------------------|-------------------|-------|
| 1,1,2,2-Tetrachloroethane   | 6.87                        | 0.76                         | 0.02              | PASS  |
| 1,1-Dichloroethene          | 19.8                        | 2.18                         | 0.04              | PASS  |
| 1,2-Dibromo-3-Chloropropane | 9.66                        | 1.06                         | 0.03              | PASS  |
| 1,3-Butadiene               | 4.42                        | 0.49                         | 0.05              | PASS  |
| 2,2,4-Trimethyl pentane     | 1401.5                      | 154.2                        | 0.16              | PASS  |
| Acetophenone                | 49.1                        | 5.41                         | 0.27              | PASS  |
| Acrylonitrile               | 4.34                        | 0.48                         | 0.01              | PASS  |
| Aniline                     | 7.54                        | 0.83                         | 0.72              | PASS  |
| Benzene                     | 1.60                        | 0.18                         | 0.12              | PASS  |

| Pollutant                  | TLV<br>(mg/m <sup>3</sup> ) | PAER (lb/hr) =<br>0.11 × TLV | Proposed<br>lb/hr | Pass? |
|----------------------------|-----------------------------|------------------------------|-------------------|-------|
| Benzyl Chloride            | 5.18                        | 0.57                         | 0.01              | PASS  |
| Bis(2-Ethylhexyl)phthalate | 5.00                        | 0.55                         | 0.19              | PASS  |
| Carbonyl Sulfide           | 245.7                       | 27.0                         | 0.21              | PASS  |
| Ethyl Acrylate             | 20.5                        | 2.25                         | 0.01              | PASS  |
| Ethyl Benzene              | 434.2                       | 47.8                         | 1.37              | PASS  |
| Glycol Ethers              | 100.0                       | 11.0                         | 0.68              | PASS  |
| Hexane                     | 176.2                       | 19.4                         | 1.09              | PASS  |
| Methanol                   | 262.1                       | 28.8                         | 0.01              | PASS  |
| Methyl Isobutyl Ketone     | 81.9                        | 9.01                         | 4.05              | PASS  |
| Methylene Chloride         | 173.7                       | 19.1                         | 1.49              | PASS  |
| Phenol                     | 19.2                        | 2.12                         | 0.11              | PASS  |
| Selenium                   | 0.200                       | 0.02                         | 0.01              | PASS  |
| Styrene                    | 85.2                        | 9.37                         | 0.76              | PASS  |
| Tetrachloroethene          | 169.5                       | 18.6                         | 0.42              | PASS  |
| Toluene                    | 75.4                        | 8.29                         | 2.46              | PASS  |
| Xylene                     | 434.2                       | 47.8                         | 0.25              | PASS  |
| Acrolein                   | 0.229                       | 0.03                         | 0.06              | Model |
| Arsenic                    | 0.010                       | 0.0011                       | 0.01              | Model |
| Beryllium                  | 0.00005                     | 5.50E-06                     | 5.13E-04          | Model |
| Cadmium                    | 0.002                       | 2.20E-04                     | 0.04              | Model |
| Carbon Disulfide           | 3.11                        | 0.34                         | 1.96              | Model |
| Formaldehyde               | 0.368                       | 0.04                         | 0.07              | Model |
| Hexachlorobutadiene        | 0.021                       | 0.0023                       | 0.03              | Model |
| Lead                       | 0.050                       | 0.0055                       | 8.35E-03          | Model |
| Mercury                    | 0.010                       | 0.0011                       | 0.01              | Model |

## 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<br>Threshold Limit Value | Modeled Concentration<br>(µg/m <sup>3</sup> ) | Pass? |
|---------------------|---|---|-------|
| Acrolein            | 2.29  | 0.52  | PASS  |
| Arsenic             | 0.10  | 0.01  | PASS  |
| Beryllium           | 5.00E-04  | 4.60E-04                                      | PASS  |
| Cadmium             | 0.02  | 2.65E-03                                      | PASS  |
| Carbon Disulfide    | 31.14   | 13.98   | PASS  |
| Formaldehyde        | 3.68  | 0.08  | PASS  |
| Hexachlorobutadiene | 0.21  | 0.1996  | PASS  |

| Pollutant | PAIL ( $\mu\text{g}/\text{m}^3$ ) = 1/100 of Threshold Limit Value | Modeled Concentration ( $\mu\text{g}/\text{m}^3$ ) | Pass? |
|-----------|--|--|-------|
| Lead      | 0.50   | 0.08   | PASS  |
| Mercury   | 0.10   | 0.01   | PASS  |

c) H<sub>2</sub>S Modeling:

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time for hydrogen sulfide.

## 12. CALCULATIONS:

| SN              | Emission Factor Source | Emission Factor and units   | Control Equipment Type | Control Equipment Efficiency | Comments                                     |
|-----------------|------------------------|---|------------------------|------------------------------|--|
| GR-01           | RMA                    | 4.00E-04 lb PM/lb rubber<br>3.86E-05 lb VOC/lb rubber<br>7.88E-03 lb VOC/ lb silica | Baghouse               | 95%                          | RMA is the Rubber Manufacturers Association. |
| GR-02           | RMA                    | 4.00E-04 lb PM /lb rubber   | Baghouse               | 95%                          |  |
| GR-03           | MSDS<br>NSPS           | PM: 8% solids<br>10% overspray<br>VOC: 7.5 gr/tread                                 | None                   | None                         |  |
| GR-04           | Stack Test             | PM: 0.0015 lb/tire<br>VOC: 2 gr/tire  | None                   | None                         |  |
| GR-05           | RMA                    | PM: 0.05 lb/tire<br>VOC: 1.59E-2 lb/lb rubber                                       | Baghouse               | 95.8%                        |  |
| GR-06           | RMA                    | PM: 0.10 lb/tire<br>VOC: 1.59E-2 lb/lb rubber                                       | Baghouse               | 99.2%                        |  |
| GR-08           | MSDS                   | VOC: 6.52 lb/gal ink<br>9.11 lb/gal thinner   | None                   | None                         |  |
| SN-07           | AP-42<br>11.24-2       | PM: 0.12 lb/ton   | Baghouse               | 95%                          |  |
| SN-53           | AP-42                  | Standard Natural Gas<br>Standard Fuel Oil   | None                   | None                         |  |
| SN-55           | AP-42                  | Standard Natural Gas<br>Standard Fuel Oil   | None                   | None                         |  |
| SN-59           | AP-42<br>Table 6.1.4   | 0.20 PM/ton Carbon Black  | Dust Collector         | 95%                          |  |
| SN-60           | AP-42<br>Table 6.1.4   | 0.20 PM/ton Carbon Black  | Dust Collector         | 95%                          |  |
| SN-67           | MSDS                   | VOC:<br>6.26 lb/gal (solvent)<br>6.28 lb/gal (cement)                               | None                   | None                         |  |
| SN-68<br>SN-106 | MSDS                   | VOC:<br>6.26 lb/gal (solvent)<br>0.055 lb/gal (paint)                               | None                   | None                         |  |

| SN                | Emission Factor Source | Emission Factor and units   | Control Equipment Type | Control Equipment Efficiency | Comments |
|-------------------|------------------------|---|------------------------|------------------------------|----------|
| SN-89             | AP-42 & Testing        | Standard Natural Gas<br>Standard Fuel Oil<br>99.7 MMBTU/hr<br>8760 hrs/yr (NG)<br>6304 hrs/yr (FO)<br>95.4 MCF/hr (NG)<br>Nat. Gas Factors<br>10 lb PM/MMCF<br>1.2 lb SO <sub>2</sub> /MMCF<br>10 lb VOC/MMCF<br>84 lb CO/MMCF<br>73.2 lb NO <sub>x</sub> /MMCF<br>Fuel Oil Factors:<br>6 lb PM/kgal<br>142(.03) lb SO <sub>2</sub> /kgal<br>0.75 lb VOC/kgal<br>25 lb CO/kgal<br>22.4 lb NO <sub>x</sub> /kgal | None                   | None                         |          |
| SN-108            | RMA                    | 30 ton/hr throughput<br>70% of rubber, milled<br>50% compd #6a mixed<br>1.1E-4 lbcompd#2/lbrubber<br>0.00371<br>lbcompd#6a/lbrubber   | None                   | None                         |          |
| SN-109            | RMA                    | VOC: 4.2E-5 lb/lb rubber  | None                   | None                         |          |
| SN-110            | RMA                    | 30 ton/hr thurput<br>40% of rubber, calendered<br>5.59E-5 lbcompd#2/lbrubber  | None                   | None                         |          |
| SN-111            | RMA                    | VOC: 3.37E-4 lb/lb rubber   | None                   | None                         |          |
| SN-121            | MSDS                   | Various   | None                   | None                         |          |
| SN-140 and SN-141 | AP-42                  | See Section 3.3 Tables 3.3-1 and 3.3-2  | None                   | None                         |          |

13. TESTING REQUIREMENTS:

The permit does not require testing.

14. MONITORING OR CEMS:

The permit does not require CEMS or other monitoring equipment.

15. RECORDKEEPING REQUIREMENTS:

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

| Source                              | Recorded Item                                | Limit (as established in permit)                              | Frequency           | Report (Y/N) |
|-------------------------------------|--|---|---------------------|--------------|
| GR-01,<br>SN-109,<br>SN-111         | Final Rubber Processed<br>(Mixed & Imported) | 220,000 tons/yr   | Monthly             | Y            |
| GR-01,<br>SN-109,<br>SN-111         | Silica Usage                                 | 7,000 tons/yr   | Monthly             | Y            |
| GR-03,<br>GR-04,<br>GR-05,<br>GR-06 | Treads/Tires Processed                       | 17,000,000 treads/yr  | Monthly             | Y            |
| GR-03                               | VOC Emissions per Tread                      | 7.5 grams/tread/month   | Monthly             | Y            |
|                                     | VOC Content                                  | Listed in Table   | Annually            | N            |
| GR-04                               | VOC Emissions of Inside Paint                | 1.0 grams/tread/month   | Monthly             | Y            |
|                                     | VOC Emissions of Outside Paint               | 1.0 grams/tread/month   | Monthly             | Y            |
| GR-08                               | Ink Throughput                               | 800 gallons/yr  | Monthly             | Y            |
|                                     | Solvent Throughput                           | 100 gallons/yr  | Monthly             | Y            |
|                                     | Ink/Thinner VOC Content                      | Listed in Table   | Annually            | N            |
| SN-53                               | Fuel Oil Throughput                          | 1,388,475 gallons/yr  | Monthly,<br>as used | Y            |
|                                     | Sulfur Content                               | 0.3 Weight %  | As needed           | N            |
| SN-55                               | Fuel Oil Throughput                          | 2,766,950 gallons/yr  | Monthly,<br>as used | Y            |
|                                     | Sulfur Content                               | 0.3 Weight %  | As needed           | N            |
| SN-59<br>SN-60                      | Carbon Black                                 | 80,000 Tons<br>Total both sources                             | Monthly             | Y            |
| SN-67                               | Cement                                       | 650 Gallons   | Monthly             | Y            |
|                                     | Solvent                                      | 2,000 Gallons   | Monthly             | Y            |
|                                     | Solvent & Cement<br>VOC Content              | Listed in Table   | Monthly             | N            |
| SN-68,<br>SN-106                    | Solvent                                      | 650 Gallons   | Monthly             | Y            |
|                                     | Solvent & Paint<br>VOC Content               | Listed in Table   | Annually            | N            |
| SN-89                               | Fuel Oil Throughput                          | 1,695,103 gallons/yr  | Monthly,<br>as used | Y            |
|                                     | Sulfur Content                               | 0.3 Weight %  | As Needed           | N            |
| SN-121                              | All HAP containing material<br>usage         | 1.17 tpy Glycol ethers<br>0.06 tpy Toluene<br>0.09 tpy Xylene | Monthly             | Y            |
| Plant                               | All VOC containing material<br>usage         | 249 tpy VOC   | Monthly             | Y            |

| Source            | Recorded Item             | Limit (as established in permit) | Frequency | Report (Y/N) |
|-------------------|---------------------------|----------------------------------|-----------|--------------|
|                   | MSDS (VOC & HAP Contents) | ----                             | As needed | N            |
| SN-140 and SN-141 | Hours of operation        | 500 hours per calendar year      | Per Event | Y            |

16. OPACITY:

| SN                  | Opacity % | Justification (NSPS limit, Dept. Guidance, etc) | Compliance Mechanism  |
|---------------------|-----------|---|---|
| GR-01 through GR-06 | 20        | Dept Guidance                                   | EPA Method 9  |
| 07                  | 20        | Dept Guidance                                   | EPA Method 9  |
| 53                  | 5         | Dept Guidance-NG                                | EPA Method 9<br>Burn only Nat. Gas  |
| 53                  | 20        | Dept Guidance Fuel Oil                          | E[Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and CFR Part 52, Subpart E]PA Method 9 |
| 55                  | 5         | Dept Guidance –NG                               | EPA Method 9<br>Burn only Nat. Gas  |
| 55                  | 20        | Dept Guidance Fuel Oil                          | EPA Method 9  |
| 89                  | 5         | Dept Guidance - NG                              | EPA Method 9  |
| 89                  | 20        | NSPS Dc – Fuel Oil                              | Continuous – CEMS   |
| 140 and 141         | 20%       | Dept Guidance                                   | Annual Observation  |

17. DELETED CONDITIONS:

No condition was deleted with this revision.

18. GROUP A INSIGNIFICANT ACTIVITIES:

| Source Name   | Group A Category | Emissions (tpy) |                  |        |       |
|---|------------------|-----------------|------------------|--------|-------|
|   |                  | VOC             | PM <sub>10</sub> | HAPs   |       |
|   |                  |                 |                  | Single | Total |
| Two (2) 6,000 gallon Naphthenic Petroleum Oil Storage Tanks #1 and #4 | A-3              | 0.074           |                  |        |       |
| 1,000 gallon No. 2 Fuel Oil Day Tank                                  | A-3              | <0.01           |                  |        |       |



| Source Name  | Group A Category | Emissions (tpy) |                  |        |       |
|--|------------------|-----------------|------------------|--------|-------|
|  |                  | VOC             | PM <sub>10</sub> | HAPs   |       |
|  |                  |                 |                  | Single | Total |
| 10,000 gallon Naphthalic Petroleum Oil Storage Tank #6                               | A-3              | 0.069           |                  |        |       |
| Three (3) 10,000 gallon Aromatic Petroleum Hydrocarbon Storage Tanks #8, #9, and #10 | A-3              | <0.01           |                  |        |       |
| 10,000 gallon Naphthenic Process Oil Blend Tank #29                                  | A-3              | <0.01           |                  |        |       |
| Dust Ring Lube Oil Tank #12  | A-3              | 0.02            |                  |        |       |
| 500 gallon Fire Pump Tank #1   | A-3              | <0.01           |                  |        |       |
| 500 gallon Fire Pump Tank #2   | A-3              | <0.01           |                  |        |       |
| Phenyldiamine Tank #7 (10,000 gallons)   | A-3              | <0.01           |                  |        |       |
| Steric Acid Tank #30 (10,000 gallons)  | A-3              | <0.01           |                  |        |       |
| Hydrocarbon Resin Tank (10,000 gallons)  | A-3              | <0.01           |                  |        |       |
| Group A-3 Total  |                  | 0.172           |                  |        |       |
| Quality Control and Materials testing Lab  | A-5              | 0.02            |                  |        | <0.01 |
| Group A-15 Total   |                  | 0.02            |                  |        | <0.01 |
| White Side Wall Protective Painters  | A-9              | 0.25            | 0.27             |        | 0.061 |
| Mold and Bladder Lube Application  | A-9              | <0.01           |                  |        | <0.01 |
| Group A-19 Total   |                  | 0.26            | 0.27             |        | <0.01 |
| Two (2) 30,000 gallon Fuel Oil Storage Tanks   | A-13             | <0.01           |                  |        |       |
| Air Compressor #1  |                  |                 | 0.04             |        |       |
| Air Compressor #2  |                  |                 | 0.04             |        |       |
| Process Water #1   |                  |                 | 0.113            |        |       |
| Process Water #2   |                  |                 | 0.113            |        |       |
| Process Water #3   |                  |                 | 0.113            |        |       |
| #1 HVAC Tower  |                  |                 | 0.082            |        |       |
| #2 HVAC Tower  |                  |                 | 0.082            |        |       |
| #3 HVAC Tower  |                  |                 | 0.265            |        |       |
| #4 HVAC Tower  |                  |                 | 0.265            |        |       |
| Group A-13 Total   |                  | <0.01           | 1.11             |        |       |

## 19. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

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

|              |
|--------------|
| Permit #     |
| 0957-AOP-R13 |



## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source

Revised 08-26-15

Facility Name: Cooper Tire & Rubber Company  
 Permit Number: 957-AOP-R14  
 AFIN: 46-00005

|               |       |                                   |           |
|---------------|-------|-----------------------------------|-----------|
| \$/ton factor | 23.93 | Annual Chargeable Emissions (tpy) | 543.81715 |
| 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)                                   | 6.8                      |
| 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                 |                                     | 47.7       | 48.2       | 0.5                 |                                 |                             |
| PM <sub>10</sub>   |                                     | 47.7       | 48.2       | 0.5                 | 0.5                             | 48.2                        |
| SO <sub>2</sub>    |                                     | 125.3      | 125.8      | 0.5                 | 0.5                             | 125.8                       |
| VOC                |                                     | 249        | 249        | 0                   | 0                               | 249                         |
| CO                 |                                     | 84.6       | 86         | 1.4                 |                                 |                             |
| NO <sub>x</sub>    |                                     | 108.2      | 114        | 5.8                 | 5.8                             | 114                         |
| Lead Compounds     | <input type="checkbox"/>            | 0.04453    | 0.04453    | 0                   |                                 |                             |
| Methylene Chloride | <input checked="" type="checkbox"/> | 5.35415    | 5.35415    | 0                   | 0                               | 5.35415                     |

| Pollutant (tpy)   | Check if Chargeable Emission        | Old Permit | New Permit | Change in Emissions | Permit Fee Chargeable Emissions | Annual Chargeable Emissions |
|-------------------|-------------------------------------|------------|------------|---------------------|---------------------------------|-----------------------------|
| Tetrachloroethene | <input checked="" type="checkbox"/> | 1.463      | 1.463      | 0                   | 0                               | 1.463                       |