STATEMENT OF BASIS

For the issuance of Air Permit # 1681-AOP-R21 AFIN: 70-00473

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Anthony Forest Products Company, LLC
4337 Lawson Road
El Dorado, Arkansas 71730

3. PERMIT WRITER:

Alexander Sudibjo

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Sawmills
NAICS Code: 321113

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
9/9/2024	Renewal	New emergency generator (SN-35) and cyclone for planer mill (SN-34)

6. REVIEWER'S NOTES:

This is the Title V renewal for this facility. With this renewal, the facility is incorporating the following changes:

1. Add a 161 bhp natural-gas fired emergency Engine (SN-35) into the permit. This engine was installed on September 1, 2018.
2. Update the Process Description.
3. Remove the 10,000 gal AST (diesel fuel) from the insignificant activity list.
4. Change the quad pack cyclone on the planer mill (SN-34) to a high efficiency cyclone. The facility discovered that a high efficiency cyclone from a different vendor

was installed instead of the one approved for the R20 permit. The PSD analysis was updated and did not change the conclusions of the analysis.
The facility's permitted annual emissions are increasing by 0.7 tpy PM, 0.7 tpy PM_{10}, 0.1 tpy SO_2, 0.3 tpy VOC, 0.4 tpy CO, 0.2 tpy NOx, 0.003 tpy acrolein, and 0.02 tpy formaldehyde.

7. COMPLIANCE STATUS:

As of September 9, 2024, there are no compliance issues with the facility. ECHO (https://echo.epa.gov/detailed-facility-report?fid=110001702346) shows no air violation identified as of January 23, 2024.

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. The emission increases in this modification are below the significant levels.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	-	NESHAP DDDD
26	NOx+NMHC, CO, PM	NSPS IIII
35	NOx, CO, VOC	NSPS JJJJ
26, 35	-	NESHAP ZZZZ
27, 28, 32, and 33	VOC	PSD

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
SN-35	R21 Issuance	N/A	N/A	N/A

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

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

(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? Y
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
IA Tanks	40 C.F.R. § 60 Subpart Kb	The tanks have capacities less than 75 m^3.
IA Gasoline Tank	40 C.F.R. § 63 Subpart CCCCCC	This subpart only applies to area sources. The facility is a major source of HAP.
SN-34	40 C.F.R. § 64 Compliance Assurance Monitoring	The quad pack cyclone operates as inherent process equipment.

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
SN-34	The quad pack cyclone is not subject to CAM because it is an inherent process equipment.	

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:

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).

Hourly emissions from SN-26 and SN-35 are not included because they are emergency engines.

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Lead	0.05	5.50E-03	7.75E-03	No
Acrolein	0.229	0.025	0.321	No
Chlorine	0.29	0.032	0.128	No
Formaldehyde	0.368	0.04	3.086	No
HCl	2.98	0.328	3.07	No
Methanol	262.1	28.83	8.118	Yes
Pentachlorophenol	0.5	0.055	8.24E-06	Yes
Antimony	0.5	0.055	1.28E-03	Yes
Arsenic	0.01	1.10E-03	3.55E-03	No
Beryllium	5.00E-05	5.50E-06	1.78E-04	No
Cadmium	0.01	1.10E-03	6.62E-04	Yes
Chromium	0.5	0.055	3.39E-03	Yes
Chromium VI	0.5	0.055	4.43E-04	Yes
Cobalt	0.02	2.20E-03	1.05E-03	Yes
Manganese	0.02	2.20E-03	0.258	No
Mercury	0.01	1.10E-03	5.65E-04	Yes
Phosphorus	0.51	0.056	4.36E-03	Yes
Selenium	0.2	0.022	4.52E-04	Yes

2nd 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 ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Lead	0.5	0.024	Yes
Acrolein	2.292	0.71	Yes
Chlorine	2.9	0.40	Yes
Formaldehyde	15	11.53	Yes
HCl	29.83	9.62	Yes
Arsenic	0.1	0.011	Yes
Beryllium	5.00E-04	4.40E-04	Yes
Manganese	0.2	0.81	No

Review of Additional Standards for Manganese

Given the potential for a ACGIH TLV standard (worker short term exposure) to be conservative when reviewing chronic health-based impacts, Anthony reviewed alternative standards for Manganese. EPA has used its weight of evidence for cancer for manganese and has classified it is not classifiable as to human carcinogenicity. The health-based risks from manganese exposure are generally categorized as either non-carcinogenic short term (acute) and long term (chronic) exposure thresholds that are likely to be without an appreciable risk of deleterious effects during a sensitive receptor's lifetime.

A review of available toxicology data for manganese was completed. Because manganese is an existing HAP, there is substantial toxicology data available. The EPA Office of Air Quality Planning and Standards compiled assessments from air toxics for use in risk assessments. The available health-based standards for manganese are evaluated in the table below. Both acute and chronic standards were available. The available acute standard is based on the IDLH/10 which is established as one-tenth of levels determined by NIOSH to be imminently dangerous to life and health, approximately comparable to mild effects levels for 1-hour exposures. The chronic standard is a minimum risk level (MRL) established for manganese in September of 2012 based on Roels HA, Ghyselen P, Buchet JP, et al. 1992. Assessment of the permissible exposure level to manganese in

workers exposed to manganese dioxide dust. Br J Ind Med 49:25-34. This assessment evaluated neurological effects of manganese exposure in 92 workers with average exposure duration of 5.3 years.

Source	Standard Type	Averaging Time	Standard Value ($\mu g/m^3$)	Maximum Modeled Impact($\mu g/m^3$)	Pass?
NIOSH	IDLH/10	Acute, 1-hr	50,000	2.29	Yes
ATSDR	MRL	Chronic, Annual	0.3	0.21	Yes

Generally, the preferred chronic noncancer dose-response value is the EPA Reference Concentration (RfC) within the IRIS database, as it is "an estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without an appreciable risk of deleterious effects during a lifetime". However, EPA considers the ATSDR MRL for manganese (Mn) the most appropriate chronic inhalation reference value to be used in its Risk and Technology Review assessments. There is an existing IRIS RfC for Mn (USEPA, 1993a), and ATSDR published an assessment of Mn toxicity which includes a chronic inhalation reference value (i.e., an ATSDR Minimal Risk Level, MRL). Both the 1993 IRIS RfC and the 2012 ATSDR MRL were based on the same study (Roels et al., 1992); however, ATSDR used updated dose-response modeling methodology (benchmark dose approach) and considered recent pharmacokinetic findings to support their MRL derivation. Because of the updated methods, EPA has determined that the ATSDR MRL is the appropriate health reference value to use in RTR risk assessments.

Based on these findings, Anthony proposes that the emissions sources do not cause unacceptable off-site acute or chronic human health impacts, i.e. "air pollution".

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:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
06 Debarking	TCEQ Wood Industry Emission Factors (2005)	PM = 0.024 lb/ton PM_{10} = 0.011 lb/ton $PM_{2.5}$ = 0.0046 lb/ton	Partial enclosure	95%	1,410,000 ton/yr 300 ton/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
06 Sawing	TCEQ Wood Industry Emission Factors (2005)	PM = 0.35 lb/ton PM_{10} = 0.2 lb/ton $PM_{2.5}$ = 0.0665 lb/ton	Building Enclosure Partial Enclosure	90% 85%	1,410,000 ton/yr 300 ton/hr
06 Log Bucking	FIRE Database for sawdust storage pile handling	PM = 1 lb/ton PM_{10} = 0.36 lb/ton $PM_{2.5}$ = 0.19 lb/ton	-	-	1,835.9 ton/yr 5.2 ton/hr
20	AP-42, 13.2	17 paved sections 0 unpaved sections sL = 0.6	Wet Suppression	50%	Logs = 1,410,000 ton/yr Chips/barks = 455,763 ton/yr Shavings = 80,370 ton/yr Finished Lumber = 424,510 ton/yr
23, 27, 30 Biomass	ADEQ Memo (10/31/2014)	VOC = 3.8 lb/MBF	-	-	<u>SN-23</u> 25 MMBtu/hr 8.2 MBF/hr 71,610 MBF/yr 219,000 MMBtu/yr 2.9 tons sawdust/hr <u>SN-27</u> 31.5 MMBtu/hr 8.7 MBF/hr 75,000 MBF/yr 275,940 MMBtu/yr 3.6 tons sawdust/hr <u>SN-30</u> 30 MMBtu/hr 11.9 MBF/hr 93,500MBF/yr 262,800 MMBtu/yr 3.4 tons sawdust/hr
	EPA Memo (6/30/2017)	$PM/PM_{10}/PM_{2.5}$ = 0.143 lb/MBF Acetaldehyde = 0.04 lb/MBF Acrolein = 0.004 lb/MBF Formaldehyde = 0.065 lb/MBF Methanol = 0.18 lb/MBF Phenol = 0.01 lb/MBF Propionaldehyde = 0.004 lb/MBF			
	AP-42, 1.6	SO_2 = 0.025 lb/MMBtu CO = 0.6 lb/MMBtu NOx = 0.22 lb/MMBtu Various HAPs			
	GHG Mandatory Reporting Rule	CO_2 = 93.8 kg/MMBtu CH_4 = 0.0072 kg/MMBtu N_2O = 0.0036 kg/MMBtu			
32 Biomass	ADEQ Memo (10/31/2014)	VOC = 3.8 lb/MBF	-	-	40 MMBtu/hr 16.3 MBF/hr 120,000 MBF/yr 350,400 MMBTu/yr 390 MBF/day
	NCDENR Wood Kiln Emission Calculator	PM = 0.143 lb/MBF $PM_{10}/PM_{2.5}$ = 0.141 lb/MBF			
	EPA Memo (6/30/2017)	Acetaldehyde = 0.04 lb/MBF Acrolein = 0.004 lb/MBF Formaldehyde = 0.065 lb/MBF Methanol = 0.18 lb/MBF Phenol = 0.01 lb/MBF Propionaldehyde = 0.004 lb/MBF			
	AP-42, 1.6	SO_2 = 0.025 lb/MMBtu CO = 0.51 lb/MMBtu Various HAPs			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	NCASI from Weyerhaeuser NR Lumber Mill (May 2010 permit)	NOx = 0.28 lb/MMBtu			
	GHG Mandatory Reporting Rule	CO_2 = 93.8 kg/MMBtu CH_4 = 0.0072 kg/MMBtu N_2O = 0.0036 kg/MMBtu			
27 Natural Gas	AP-42, 1.4	NOx = 0.27 lb/MMBtu Various HAPs	-	-	31.6 MMBtu/hr
25, 28, 31, 33 Diesel Fuel	AP-42, 1.3	SO_2 = 7.1 lb/1000 gal NO_X = 20 lb/1000 gal CO = 5 lb/1000 gal PM = 2 lb/1000 gal VOC = 1.1 lb/1000 gal	-	-	Max diesel usage 15 gal/hr 360 gal/yr
25, 28, 31, 33 Sawdust	AP-42, 1.3 for distillate oil fired bilers < 100 MMBtu/hr AP-42, 1.6 for wet wood	PM = 0.35 lb/MMBtu PM_{10} = 0.33 lb/MMBtu $PM_{2.5}$ = 0.31 lb/MMBtu SO_2 = 0.025 lb/MMBtu NO_X = 0.22 lb/MMBtu CO = 0.6 lb/MMBtu VOC = 0.017 lb/MMBtu Various HAPs	-	-	8.8 MMBtu/hr 4382 Btu/lb 2000 lb/hour Max duration of startup = 24 hours Max 12 startups per kiln in a year Max hours of operation = 288 hour/yr per kiln
	GHG Mandatory Reporting Rule	CO_2 = 93.8 kg/MMBtu CH_4 = 0.0072 kg/MMBtu N_2O = 0.0036 kg/MMBtu			
26	NSPS IIII Tier 3 Limit	PM/PM_{10} = 0.2 g/kW-hr NOx = 4.0 g/kW-hr CO = 3.5 g/kW-hr VOC = 4.3 g/kW-hr	-	-	175 bhp 1.47 MMBtu/hr 500 hr/yr
	AP-42, 3.3-2	SO_2 = 0.29 lb/MMBtu Various HAPs			
34	Manufacturer's Spec	PM = 0.232 lb /hr PM_{10} = 0.228 lb/hr $PM_{2.5}$ = 0.228 lb/hr 0.004 gr/dscf	Quad Pack Cyclone		Shavings throughput 80,000 lb/hr 80,370 ton/yr 1.2 safety factor
35	NSPS JJJJ	NOx = 2 g/bhp-hr VOC = 4 g/bhp-hr VOC = 1 g/bhp-hr	-	-	161 bhp 1.64 MMBtu/hr 500 hr/yr
	AP-42, 3.3 Highest between 4SRB & 4SLB	PM = 9.91E-03 lb/MMBtu PM_{10} = 9.50E-03 lb/MMBtu SO_2 = 5.88E-04 lb/MMBtu Various HAPs			

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN(s)	Pollutant	Test Method	Test Interval	Justification For Test Requirement
23 (DPK#1)	PM_{10}	5	One time (performed on February 28, 2018)	Dept. Guidance (Test for Emission Verification)
	CO	10		
30 (DPK#2)	PM_{10}	5	One time	Dept. Guidance (Test for Emission Verification)
	CO	10		
27 (DPK#3)	PM_{10}	201/201A	One time (performed on October 2, 2018)	Dept. Guidance (Test for Emission Verification)
	CO	10		
32 (DPK#4)	PM_{10}	5	One time	Dept. Guidance (Test for Emission Verification)
	CO	10		

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)
20	Wet Suppression Application	As needed to control visible emissions from traffic	As needed but no less than once a month	N
	Products Transported	in tons of product per consecutive 12 months Logs: 1,410,000 Finished Lumber: 424,510	Monthly	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
23 & 25	Lumber Throughput	71.61 MMBF per consecutive 12 months	Monthly	Y
27 & 28	Lumber Throughput	75.0 MMBF per consecutive 12 months	Monthly	Y
30 & 31	Lumber Throughput	93.5 MMBF per consecutive 12 months	Monthly	Y
32 & 33	Lumber Throughput	120.0 MMBF per consecutive 12 months	Monthly	Y
25	Diesel fuel usage limit as starter fluid	360 gallons per consecutive 12 months	Daily when in startup	N
	Abort stack operating hours	288 hours per consecutive 12 months	Monthly	Y
	Sawdust throughput limit for gasifier/burner	2000 lb of sawdust per hour	Daily when in startup	N
28	Diesel fuel usage limit as starter fluid	360 gallons per consecutive 12 months	Daily when in startup	N
	Abort stack operating hours	288 hours per consecutive 12 months	Monthly	Y
	Sawdust throughput limit for gasifier/burner	2000 lb of sawdust per hour	Daily when in startup	N
31	Diesel fuel usage limit as starter fluid	360 gallons per consecutive 12 months	Daily when in startup	N
	Abort stack operating hours	288 hours per consecutive 12 months	Monthly	Y
	Sawdust throughput limit for gasifier/burner	2000 lb of sawdust per hour	Daily when in startup	N
33	Diesel fuel usage limit as starter fluid	360 gallons per consecutive 12 months	Daily when in startup	N
	Abort stack operating hours	288 hours per consecutive 12 months	Monthly	Y
	Sawdust throughput limit for gasifier/burner	2000 lb of sawdust per hour	Daily when in startup	N
26	Hours of Operation	500 hours per calendar year	Monthly	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
35	Hours of Operation	500 hours per calendar year	Monthly	Y
34	Wood Shavings Throughput	80,370 tons of wood shavings per rolling 12 month	Monthly	Y

19. OPACITY:

SN	Opacity %	Justification for limit	Compliance Mechanism
06	20	Rule 19.503	Weekly observation
20	5	Rule 18.501	Monthly or more frequent watering depending on weekly observation
23, 27, 30, 32	20	Rule 19.503	Weekly observation
25, 28, 31, 33	20	Rule 19.503	Observation during Startup
26	20	Rule 19.503	Daily observation when use exceeds 24-hours per event
35	5	Rule 18.501	Daily observation when use exceeds 24-hours per event
34	5	Rule 18.501	Monthly observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
N/A	

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
Sawdust Conveyance	A-13	0.011	0.001						
Chips Conveyance	A-13	0.022	0.011						
Sawdust Fines Conveyance	A-13	0.001	0.001						

Source Name	Group A Category	Emissions (tpy)							
		PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs	
								Single	Total
Bark storage pile	A-13	0.25	0.125						
Sawdust storage pile	A-13	0.789	0.394						
Boiler ash (Biochar) storage Pile	A-13	0.342	0.17						
Chip Overflow Pile	A-13	0.244	0.122						
Planer Mill Woodwaste storage bin	A-13	0.133	0.011						
Fuel Storage Silo	A-13	0.209	0.017						
Chip Storage Bin	A-13	0.213	0.021						
Fines Bin	A-13	0.019	0.002						
Bark Bin	A-13	0.293	0.023						
1,000 gallon gasoline tank	A-13				0.04				
Parts Washer	A-13				0.01				
A-13 Total		2.52	0.90		0.05				
2000 gallon diesel tank	A-3				0.01				

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 #
1681-AOP-R20

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Anthony Forest Products Company
Permit Number: 1681-AOP-21
AFIN: 70-00473

$/ton factor	28.14	Annual Chargeable Emissions (tpy)	847
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)	1.3
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM: *Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride*

Air Contaminants: *All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)*

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		36.8	37.5	0.7	0.7	37.5
PM_{10}		31.7	32.4	0.7		
$PM_{2.5}$		0	0	0		
SO_2		14.6	14.7	0.1	0.1	14.7
VOC		684.9	685.2	0.3	0.3	685.2
CO		320.3	320.7	0.4		
NO_X		109.4	109.6	0.2	0.2	109.6
Lead	☐	0.0268	0.0268	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Acrolein	☐	0.743	7.46E-01	0.003		
Antimony	☐	0.00442	0.00442	0		
Arsenic	☐	0.0123	0.0123	0		
Beryllium	☐	0.000615	0.000615	0		
Cadmium	☐	0.00229	0.00229	0		
Chlorine	☐	0.448	0.448	0		
Chromium	☐	0.0117	0.0117	0		
Chromium VI	☐	0.00194	0.00194	0		
Cobalt	☐	0.00363	0.00363	0		
HCl	☐	10.63	10.63	0		
Manganese	☐	0.895	0.895	0		
Mercury	☐	0.00196	0.00196	0		
Methanol	☐	32.42	32.42	0		
Pentachlorophenol	☐	0.0000285	0.0000285	0		
Phosphorus	☐	0.0151	0.0151	0		
Selenium	☐	0.00157	0.00157	0		
Formaldehyde	☐	11.74	11.76	0.02		
Total Other HAPs	☐	14.33	14.33	0		