STATEMENT OF BASIS

For the issuance of Draft Air Permit # 2205-AOP-R6 AFIN: 73-01084

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Fayetteville Express Pipeline LLC - Russell Compressor Station
310 Curtis Davis Road
Bald Knob, Arkansas 72010

3. PERMIT WRITER:

Thamoda Crossen

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Pipeline Transportation of Natural Gas
NAICS Code: 486210

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
11/13/2024	Renewal	To update tank emission factors due to changes in AP-42

6. REVIEWER'S NOTES:

This permitting action is necessary to renew the permittee's Title V permit with an exception to update tank emission factors due to changes in AP-42.

Total permitted emissions changes included 0.07 tpy of Formaldehyde and 0.13 tpy of HAPs.

7. COMPLIANCE STATUS:

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

On August 10th, 2023 inspection was conducted and there were no active/pending enforcement actions for this facility.

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? N

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

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
01 through 11	VOC, CO & NO_X	NSPS JJJJ
01 through 10	CO or Formaldehyde	NESHAP ZZZZ
11	Compliance achieved by complying with NSPS JJJJ	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? N
If not, explain why.

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
N/A		

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:

As there were no changes to emissions, the below is taken from the previous permit revision.

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?
1,3-Butadiene (106-99-0)	4.42	0.4862	0.03115	Pass
2,2,4-Trimethylpentane	1402.45	154.2695	0.02801	Pass
Acetaldehyde	45.04	4.9544	0.94231	Pass
Acrolein [107-02-8]	0.2293	0.025	0.58040	Fail
Ammonia	1402.45	154.26	9.60	Pass
Benzene	0.00639	0.0007029	0.05231	Fail
Biphenyl	1.26	0.1386	0.02373	Pass
Ethylbenzene	86.84	9.5524	0.00450	Pass
Formaldehyde [50-00-0]	1.5	0.165	7.56460	Fail
Methanol	262.09	28.8299	0.28603	Pass
n-Hexane	176.24	19.3864	0.12411	Pass
Toluene	92.14	10.1354	0.04676	Pass
Xylene	86.84	9.5524	0.02098	Pass

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?
Acrolein	2.293	0.2088	Pass
Benzene	0.0703	0.06524	Pass
Formaldehyde	16.5	2.391	Pass

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:

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01-03	[4]AP-42 Table 3.2-2 (08/00) (*uncontrolled* 4SLB) for PM, SO_2 [2] Manuf. Spec. Cat G3616 Cat Spec DM8608-00-002 (rev 12/14/08) for VOC, CO, NO_X & Formaldehyde [3] 1/19/2009 Email from David Zenthoefer (Miratech SCR expert) to Lee (ETC) 75% reduction of AP-42 Table 3.2-2 HAPs	g/hp-hr [2] VOC: 0.19 [2] CO: 0.19 [2] NO_X: 0.50 Benzene: 3.75E-4 1,3-Butadiene: 2.27E-4 Biphenyl: 1.81E-4 Fmldh: 1.00E-1 2,2,4-Trimethylpentane: 2.13E-04 Acetaldehyde: 7.12E-3 Ethylbenzene: 3.38E-5 Acrolein: 4.38E-3 Methanol: 2.13E-3 n-Hexane: 9.46E-4 Toluene: 3.48E-4 Xylene: 1.57E-4 Lb/MMBtu PM_{10}: 7.71E-5 SO_2: 5.88E-4 VOC: 5.55E-2 CO: 5.63E-2 NO_X: 1.47E-1 Benzene: 1.10E-4 1,3-Butadiene: 6.68E-5 Biphenyl: 5.30E-5 Fmldh: 2.93E-2 2,2,4-Trimethylpentane: 6.25E-5 Acetaldehyde: 2.09E-3 Ethylbenzene: 9.93E-6 Acrolein: 4.38E-3 Methanol: 2.13E-3 n-Hexane: 9.46E-4 Toluene: 3.48E-4 Xylene: 1.57E-4	Oxidizing Catalyst Miratech model SP-PTCIT-72S3624x41-2x18/30	% Reduction VOC: 70% CO: 93% [3] HAPs: 75%	Caterpillar G3616 RICE 4SLB 4,735 bhp Fuel heating value = 1005 @8760 hrs/yr
04-07	[1] AP-42 Table 3.2-2 (08/00) (uncontrolled 4SLB) for PM, SO_2	g/hp-hr PM_{10}: 2.08E-4 SO_2: 1.59E-3	Oxidizing Catalyst Miratech	% Reduction VOC: 60%	Caterpillar G16CM34

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	[2] Manuf. Spec. Cat Spec 229036-M-HTB-201 (rev 04) for VOC, CO, NO_X[1] & Formaldehyde [3] 1/19/2009 Email from David Zenthoefer (Miratech SCR expert) to Lee (ETC) 75% reduction of AP-42 Table 3.2-2 HAPs	VOC: 0.12 CO: 0.24 NO_X: 0.50 Benzene: 2.97E-4 1,3-Butadiene: 1.80E-4 Biphenyl: 1.43E-4 Fmldh: 3.50E-2 2,2,4-Trimethylpentane: 1.69E-4 Acetaldehyde: 5.65E-3 Ethylbenzene: 2.68E-5 Acrolein: 3.47E-3 Methanol: 1.69E-03 n-Hexane: 7.50E-4 Toluene: 2.76E-4 Xylene: 1.24E-4 Lb/MMBtu PM_{10}: 7.71E-5 SO_2: 5.88E-4 VOC: 4.44E-2 CO: 8.81E-2 NO_X: 1.85E-1 Benzene: 1.10E-4 1,3-Butadiene: 6.68E-5 Biphenyl: 5.30E-5 Fmldh: 1.29E-2 2,2,4-Trimethylpentane: 6.25E-5 Acetaldehyde: 2.09E-3 Ethylbenzene: 9.93E-6 Acrolein: 1.29E-3 Methanol: 6.25E-4 n-Hexane: 2.78E-4 Toluene: 1.02E-4 Xylene: 4.60E-5	model SP-RESIGA-90S3624x61-42-H4	CO: 93% [3] HAPs: 75%	RICE 4SLB 8180 hp Fuel heating value = 1005 @8760 hrs/yr
08-10	[1] AP-42 Table 3.2-2 (08/00) (uncontrolled 4SLB) for PM, SO_2 [2] Manuf. Spec. Cat Spec 229036-M-HTB-201 (rev 04), [4] Miratech spec DZ-09-4147 Rev (9) Post sys	g/hp-hr PM_{10}: 2.08E-4 SO_2: 1.59E-3 VOC: 0.12 CO: 0.24 NO_X: 0.10 Ammonia: 0.04 Benzene: 2.97E-4	Oxidizing Catalyst Miratech model SP-RESIGA-90S3624x61-42-H4 for	% Reduction VOC: 60% CO: 93% [3] HAPs: 75%	Caterpillar G16CM34 RICE 4SLB 8180 hp Fuel heating value = 1005

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	(01/25/10) & [2] Miratech spec sheet 3/05/09 for VOC[2], CO[2] & NO_X[4] & Formaldehyde[2] [3] 1/19/2009 Email from David Zenthoefer (Miratech SCR expert) to Lee (ETC) 75% reduction of AP-42 Table 3.2-2 HAPs	1,3-Butadiene: 1.80E-4 Biphenyl: 1.43E-4 Fmldh: 3.50E-2 2,2,4-Trimethylpentane: 1.69E-4 Acetaldehyde: 5.65E-3 Ethylbenzene: 2.68E-5 Acrolein: 3.47E-3 Methanol: 1.69E-03 n-Hexane: 7.50E-4 Toluene: 2.76E-4 Xylene: 1.24E-4 <u>Lb/MMBtu</u> PM_{10}: 7.71E-5 SO_2: 5.88E-4 VOC: 4.44E-2 CO: 8.81E-2 NO_X: 3.51E-2 Benzene: 1.10E-4 1,3-Butadiene: 6.68E-5 Biphenyl: 5.30E-5 Fmldh: 1.29E-2 2,2,4-Trimethylpentane: 6.25E-5 Acetaldehyde: 2.09E-3 Ethylbenzene: 9.93E-6 Acrolein: 1.29E-3 Methanol: 6.25E-4 n-Hexane: 2.78E-4 Toluene: 1.02E-4 Xylene: 4.60E-5	VOC, CO & HAPs <u>SCR</u> Miratech SP-CBL169-48/42 for NO_X	NO_X: 81%	SCR reduces NO_X @8760 hrs/yr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
11	[1] AP-42 Table 3.2-3 (08/00) (*uncontrolled* 4SRB) (for PM, SO_2 & HAPs) [2] Manuf. Spec. (for VOC, CO, NO_X & Fmldh)	g/hp-hr PM_{10}: 3.34E-2 SO_2: 2.07E-3 VOC: 0.25 CO: 4.00 NO_X: 2.00 Benzene: 5.56E-3 1,3-Butadiene: 2.33E-3 Fmldh: 5.00E-2 Acetaldehyde: 9.81E-3 Ethylbenzene: 8.72E-5 Acrolein: 9.25E-3 Methanol: 1.08E-2 Toluene: 1.96E-3 Xylene: 6.86E-4 Lb/MMBtu PM_{10}: 9.50E-3 SO_2: 5.88E-4 VOC: 7.11E-2 CO: 1.14E NO_X: 5.69E-1 Benzene: 1.58E-3 1,3-Butadiene: 6.63E-4 Fmldh: 1.42E-2 Acetaldehyde: 2.79E-3 Ethylbenzene: 2.48E-5 Acrolein: 2.63E-3 Methanol: 3.06E-3 Toluene: 5.58E-4 Xylene: 1.95E-4	NSCR Miratech model IQ-12-04-C1	% Reduction CO: 73.3% NO_X: 88.9% HAPs: 0%	RICE 4SRB @500 hrs/yr 250 hp = 8.4 MMBtu/hr 66,000 bhp

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01-10	VOC CO NO_X	EPA Methods 25A & 18 for VOC, Method 7E for NO_X and Method 10 for CO	Every 3 years or every 8,760 operating hours per engine, whichever comes first	NSPS – 40 CFR Part 60, Subpart JJJJ
01-03 & 04-10	Formaldehyde or CO	EPA Methods 320 or 323 for Formaldehyde or Method 10 for CO	Annual	NESHAP – 40 CFR Part 63, Subpart ZZZZ
Replacement Engine(s) on temporary or permanent basis	NO_X and CO	EPA Methods 7E for NO_X and Method 10 for CO	Annual, see PWC #8	§19.705, A.C.A. and 40 CFR 70.6
Change of Catalyst on any RICE SC #28	NO_X and CO	EPA Methods 7E for NO_X and Method 10 for CO	No later than 180 days after initial startup of the permitted source	§19.304 and §63.6640(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)
08-10	NO_X & NO	Electrochemical NO cell	Every 15 min.	No
1-11	Operating Hours	Non-resettable Hour Meter	On-going	No
1-10	Catalyst Temperature	Thermocouple	Continuous	No
1-10	Pressure Differential	Pressure Gauge	Continuous	No
1-10	Engine Load per AMP, specifics in SC #27c	Load Meter	Continuous	Yes

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)
01-10	Operating Hours	Record on non-resettable hour meters	On-going	Yes
01-03	VOC, CO & NO_X Performance Tests, Notifications & documents that engine meets SIP and NSPS JJJJ emission limits. Follow test procedures. Submit entire report and op hours.	SIP Emission Limits VOC = 0.19 g/hp-hr CO = 0.19 g/hp-hr NO_X = 0.50 g/hp-hr NSPS JJJJ Limits VOC = 1.0 g/hp-hr CO = 4.0 g/hp-hr NO_X = 2.0 g/hp-hr	Test every 3 years or every 8760 op hrs whichever comes first	Yes
04-07	VOC, CO & NO_X Performance Tests, Notifications & documents that engine meets SIP and NSPS JJJJ emission limits. Follow test procedures. Submit entire report and op hours.	SIP Emission Limits VOC = 0.12 g/hp-hr CO = 0.24 g/hp-hr NO_X = 0.50 g/hp-hr NSPS JJJJ Limits VOC = 1.0 g/hp-hr CO = 4.0 g/hp-hr NO_X = 2.0 g/hp-hr	Test every 3 years or every 8760 op hrs, whichever comes first	Yes
08-10	VOC, CO & NO_X Performance Tests, Notifications & documents that engine meets SIP and NSPS JJJJ emission limits. Follow test procedures. Submit entire report and op hours.	SIP Emission Limits VOC = 0.12 g/hp-hr CO = 0.24 g/hp-hr NO_X = 0.10 g/hp-hr NSPS JJJJ Limits VOC = 1.0 g/hp-hr CO = 4.0 g/hp-hr NO_X = 2.0 g/hp-hr	Test every 3 years or every 8760 op hrs, whichever comes first	Yes

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
08-10	When SCR not operating, account for uncontrolled NO_X emissions in annual totals, include in SAMs. Maintain SSM Plan. Identify NO monitor malfunctions. + corrective actions taken	Raw OEM Emission Data (Uncontrolled Startup Event) NO_X = 0.50 g/hp-hr	Every startup events/times SCR is not operating & account for raw NO_X	Yes
01-10	Maintain a rolling 12-month total of NO_X emissions. Report in SAMs.	Not-to-exceed NO_X SN-01–03: 22.9 tpy each SN-04–07: 39.5 tpy each SN-08–10: 7.5 tpy each SN-11: 0.3 tpy Total 249.5 tpy NO_X	Monthly	Yes
01-10	Submit SAMs.	SC #19	Semiannually	Yes
01-10	Post and maintain clearly visible labels at the engines	Identify each engine	On-going	No
01-10	O&M Plan	Records for each engine of conducted maintenance and maintain and operate in a manner consistent with good air pollution control practice for minimizing emissions.	As occurs	No
01-10	Initial Notification	Keep copy on site.	Complete	No
08-10	Excursions or Exceedances + SSM Plan requirements	For each engine with an SCR: Submit information pertaining to exceedances or excursions from	Keep current up-to-date log as EE occurs	Yes, semi-annual

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		permitted values in semi-annual reports in accordance with General Provision #7 and SC #16a through #16e.		
01-10	CO or CH_2O Performance Test: NESHAP ZZZZ Emission Limits for New and Reconstructed 4SLB Stationary RICE ≥250 HP Located at a Major Source of HAP Emissions	Reduce CO emissions by 93% or more or limit concentration of formaldehyde in the stationary RICE exhaust to 14 ppmvd or less than at 15% O_2 dry basis	Annual	Yes
01-10	Operating Limitations for Catalyst when operating at at 100 % load ± 10 %	Maintain catalyst pressure drop to not change by more than 2" H_2O at 100 % load ± 10 % from pressure drop across catalyst measured during initial or subsequent test; and b. Maintain RICE exhaust temp so catalyst inlet temperature is ≥ 450 °F and <1350 °F.	On-going	Yes
01-10	AMP	See SC #27 for more details. a. Document periods when engine is not running and record pressure drop immediately upon next startup. b. Record pressure drop immediately once the engine load increases to 100% (±10%). If 100% (±10%) load	As occurs	Yes

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		not achieved during entire 30-day period, then monthly pressure drop must be measured at the max load during that 30-day period. c. FEP's semi-annual report required in shall identify all calendar months or periods of a calendar month during which an engine operates at less than a 100% (±10%) load and SAR must summarize the maximum load achieved and the load percentage where pressure drop across the catalyst was actually measured during each 30-day period.		
11	Operating Hours on non-resettable meter	500 hours per calendar 12 months	Monthly	Yes
11	Non-emergency Hours	100 hours per calendar year of maintenance and testing, includes 50 hours of non-emergency usage	Monthly	Yes
11	During Extended Emergency Use in excess of 500 hours	No time limit but must record hours of duration and notify ADEQ of exceedance, etc.	Monthly	Yes
11	O&M Plan Log of Maintenance	Follow Manufacturer's	As occurs	Yes

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
		Operating Instructions and keep log		
11	AFR Controller	Maintained and operated appropriately	Monthly	No
Facility	Valid gas tariff, purchase contract, fuel analysis, or other appropriate doc, or periodic testing.	Pipeline Quality Natural Gas as only fuel	Keep current document onsite	No
Facility	Submit Permit Renewal application at least 6 months prior to permit expiration.	Permit is valid for 5 years, beginning on date permit becomes effective and ends five (5) years later, GP #3	Every 5 years,	Yes
Facility	Submit Annual Compliance Certificate (ACC)	General Provision #21	Annually, postmarked no later than April 30th every year	Yes

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
Facility	5%	Reg.18.501 and Ark. Code Ann. § 8-4-203 as referenced by §§ 8-4-304 and 8-4-311	Natural gas only fuel

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
Tank 4,200 gal Cooling Water	3	-	-	-	-	-	-	-
Tank 4,200 gal Used Cooling Water	3	-	-	-	-	-	-	-
3 Tanks 5,000 gal Urea	3	-	-	0.0009	-	-	-	-
Tank 4,200 gal Used Lube Oil	13	-	-	0.2	-	-	-	-
Tank 12,600 gal pipeline fluids storage tank and loadout	13	-	-	1.5	-	-	-	-
Tank 12,600 gal Lube Oil (Crude Oil RVP 5)	13	-	-	0.6	-	-	-	-
Tank 12,600 gal Waste Water w/oil traces	13	-	-	-	-	-	-	-
Equipment Leaks (EPA's Protocol for Equipment Leak Emission Estimates, Table 2-4)	13	-	-	0.0	-	-	-	-

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 #
2205-AOP-R5

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Fayetteville Express Pipeline LLC - Russell Compressor Station
Permit Number: 2205-AOP-R6
AFIN: 73-01084

$/ton factor	28.14	Annual Chargeable Emissions (tpy)	345.1
Permit Type	Renewal No Changes	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	☐
If Hold Active Permit, Amt of Last Annual Air Permit Invoice $	0
Total Permit Fee Chargeable Emissions (tpy)	0
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		1.1	1.1	0		
PM_{10}		1.1	1.1	0	0	1.1
$PM_{2.5}$		0	0	0		
SO_2		1.8	1.8	0	0	1.8
VOC		92.7	92.7	0	0	92.7
CO		158.6	158.6	0		
NO_X		249.5	249.5	0	0	249.5

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Formaldehyde	☐	33.09	33.16	0.07		
Total HAPs	☐	42.32	42.45	0.13		
Ammonia	☐	9.6	9.6	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		