

October 10, 2025

Alexis S. Brusceci  
Air Quality Program  
PA Department of Environmental Protection  
Southwestern Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222

RE: Response to Technical Review Deficiencies  
ETC Northeast Pipeline, LLC  
Revolution Cryo II Plan Approval Application  
Smith Township, Washington County

Dear Alexis Brusceci:

ETC Northeast Pipeline, LLC (ETC) is providing this response to address the Department's email received on August 28, 2025, which outlined deficiencies identified during technical review of the Revolution Cryo II plan approval application. The Department's comments are identified below in ***bold italics***, with ETC's response following in normal text.

- 1. Please provide the date when the site-specific gas analysis for "Cryo Plant Inlet Gas" was taken. [25 Pa. Code §127.12(a)(2)]***

#### RESPONSE

The *Cryo Plant Inlet Gas* gas analysis used for the PTE calculations and ProMax modeling is not a spot sample. Instead, ETC utilized a representative sample to account for compositional variability in the gas currently received by the existing cryogenic unit (Cryo I). The compositional variability is a result of gas being sent to the facility from multiple compressor stations. The volume of gas received from any individual compressor station fluctuates on a regular basis and therefore a spot sample is not properly representative of the inlet gas's typical composition. The proposed cryogenic unit (Cryo II) will receive the same inlet gas as Cryo I.

- 2. Per 25 Pa. Code §127.12(a)(5), an application for plan approval must "[s]how that the emissions from a new source will be the minimum attainable through the use of the best available technology, where, per 25 Pa. Code §121.1, best available technology (BAT) is defined as the "equipment, devices, methods or techniques as determined by the Department which will prevent, reduce or control emissions of air contaminants to the maximum degree possible and which are available or may be made available.***
  - a. On May 2, 2025, the Department issued a plan approval for a project at MarkWest Liberty Midstream & Resources, LLC, Harmon Creek Gas Processing Plant which implement BAT for the control of fugitive emissions in a two-fold and incorporates both low-emissions valves and welded or flanged connections. The requirements specified by the Texas Commission on Environmental Quality (TCEQ) in its 28VHP LDAR Program and piping construction standards specified in the TCEQ Air Permit Technical Guidance for Chemical Sources - Fugitive Guidance (APDG 6422v2; Revised 6/2018) were implemented. For valves***

***equal to or greater than 1" in diameter, valves designated as Low-Emissions Valve (or Low-E Valve) were utilized which are warranted by the manufacturer(s) to either not emit greater than 100 ppm of fugitive emissions within the first seven (7) years of service, valves that have been tested by the manufacturer or qualified testing firm to not emit greater than 500 ppm at any time (but 100 ppm on average), and valve extensions (valves of the same type, stem motion, tolerances, surface finishes, loading arrangement, and stem (packing) and body seal material, design, and construction). The use of Low-Emissions Valves will reduce fugitive emissions from valves by 99% or greater as compared to EPA AP-42 emissions factors. Please evaluate this technology for your project. [25 Pa. Code §127.12(a)(5)]***

#### RESPONSE

ETC plans to install Low-E Valves where applicable and available within the proposed project's design. ETC will continue to conservatively calculate fugitive PTE with the assumption that the project's design will not incorporate any of the references Low-E Valves. Gas leak emission factors will continue to be from the 1995 Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017) Table 2-4 and each component's control efficiency resulting from implementation of the NSPS OOOOb's LDAR program will continue to be determined based on "TCEQ - Control Efficiencies for TCEQ Leak Detection and Repair Programs" (rev. 07/22).

- b. The Department obtained publicly available information which indicated that natural gas burners with heat input ratings between approximately 10 MMBtu/hr and 42 MMBtu/hr were currently available and capable of achieving <5ppm NOX with flue gas recirculation (FGR) and without selective catalytic reduction (SCR). ETC's BAT analysis indicated that "FGR is considered to be technically feasible (for HMO heaters), however, this emission reduction methodology is not carried down, as specifically designed LNBs will be used to demonstrate compliance with the BAT limits outlined in PADEP's GP-1 permit." Please note that the standards in PADEP's GP-1 permit was established in January 2023. Technology has since advanced and improved. General Permit standards should be considered the starting point for the BAT analysis. Please evaluate all potential available control technologies for NOx emission reduction. [25 Pa. Code §127.12(a)(5)]***

#### RESPONSE

Although there is publicly available information for natural gas burners using FGR being rated capable of achieving <5 ppm NO<sub>x</sub>, there is no publicly available documentation demonstrating the achievement of 5 ppm NO<sub>x</sub> standard once burners were installed and operating. Additionally, as of January 2023, no natural gas burners using FGR rated capable of achieving <5 ppm NO<sub>x</sub> have been determined as BACT or LAER (see Attachment 1 for RLBC results). Furthermore, the Harmon Creek Plan Approval issued May 2, 2025, which is referenced in the other comments for BAT, does not incorporate the burners referenced in this comment as BAT, citing cost effectiveness (see DEP's February 10, 2025, review memo). Similar cost effectiveness concerns would be applicable here. After reviewing the costs associated with reducing NO<sub>x</sub> emissions from 9 ppm to 5 ppm, at a capital expense of \$200,000 per HMO heater, it has been determined that implementing 5 ppm heaters is not cost-effective, as the

control cost is approximately \$24,000 per ton of NOx removed.<sup>1</sup>

- c. ***MarkWest committed to constructing and operating a vapor recover unit (VRU) system to capture 100% of the emissions. The proposed use of a VRU will achieve an overall destruction and removal efficiency (DRE) of 98% or greater when accounting for maintenance outages, will reduce combustion emissions from the flare, and will recover previously wasted product (and associated value), and therefore constitutes BAT for the control of VOC, HAP, and methane (CH4) from blowdowns, venting, and tanks. ETC's BAT analysis states "based on regulatory requirements for the industry such as NSPS 0000a, VRU's have a generally accepted control efficiency of 95% which accounts for 5% VRU downtime." Please re-evaluate your BAT proposal based on achieving an overall DRE at 98% or better. [25 Pa. Code §127.12(a)(5)]***

#### RESPONSE

According to §60.5412a(d)(2) and §60.5412b(a)(2), federal regulations require vapor recovery devices to be designed and operated to reduce mass content of VOC by 95%. ETC utilized the 5% downtime assumption to conservatively estimate emissions. ETC has proposed to send the gas vented to the VRU system during its downtime for maintenance outages to the flare, which will achieve a removal efficiency of 98%. Therefore, ETC is proposing a control system with an overall DRE 99.90%, demonstrating BAT in line with previous determinations by the agency.

If you have additional questions or require clarification on any of the items discussed in this letter, please contact Mario Garcia at (713) 989-4603 or by email at Mario.Garcia@energytransfer.com.

Sincerely,

Mario Garcia  
Sr. Engineer - Environmental

cc:

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<sup>1</sup> Annualized cost was developed using the current interest rate of 7.5% and equipment life of 20 years.

## **ATTACHMENT 1: HMO HEATER RBLC SEARCH**

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COMPREHENSIVE REPORT  
Report Date:09/11/2025

**Facility Information**

<b>RBLC ID:</b>	IN-0384 (final)	<b>Date Determination</b>
<b>Corporate/Company Name:</b>	INVENERGY THERMAL DEVELOPMENT LLC	<b>Last Updated:</b> 04/09/2025
<b>Facility Name:</b>	SYCAMORE RIVERSIDE ENERGY LLC	<b>Permit Number:</b> 153-47292-00062
<b>Facility Contact:</b>	JOHN NILAND JNILAND@INVENERGY.COM	<b>Permit Date:</b> 03/31/2025 (actual)
<b>Facility Description:</b>	stationary electric generation facility	<b>FRS Number:</b> Not Found
<b>Permit Type:</b>	A: New/Greenfield Facility	<b>SIC Code:</b> 4911
<b>Permit URL:</b>		<b>NAICS Code:</b> 221112
<b>EPA Region:</b>	5	<b>COUNTRY:</b> USA
<b>Facility County:</b>	SULLIVAN	
<b>Facility State:</b>	IN	
<b>Facility ZIP Code:</b>	47849	
<b>Permit Issued By:</b>	INDIANA DEPT OF ENV MGMT, OFC OF AIR (Agency Name) MR. MATT STUCKEY(Agency Contact) (317) 233-0203 mstuckey@idem.in.gov	
<b>Other Agency Contact Info:</b>	Permit Reviewer: Maddison Hite mhite@idem.in.gov 317-234-4972 Section Chief: Heath Hartley hhartley@idem.in.gov 317-233-8217	
<b>Permit Notes:</b>	Facility wide pollutants are after BACT and PSD Minor limits. The source took additional limits to comply with NAAQS standards	
<b>Facility-wide Emissions:</b>	<b>Pollutant Name:</b>	<b>Facility-wide Emissions Increase:</b>
	Carbon Monoxide	2389.0000 (Tons/Year)
	Nitrogen Oxides (NOx)	7261.0000 (Tons/Year)
	Particulate Matter (PM)	711.0000 (Tons/Year)
	Sulfur Oxides (SOx)	12.0000 (Tons/Year)
	Volatile Organic Compounds (VOC)	259.0000 (Tons/Year)

**Process/Pollutant Information**

**PROCESS** Four GE 7FA.05 simple cycle combustion turbines

**NAME:**

**Process Type:** 15.110 (Natural Gas (includes propane & liquified petroleum gas))

**Primary Fuel:** Natural Gas

**Throughput:** 240.00 MW Each

02/27/2025

167-45208-00091

01/11/2024 (actual)

110002354602

2869

325199

USA

**Process Notes:** 4 natural gas-fired GE model 7FA.05 simple cycle combustion turbines, identified as 1-4, approved in 2025 for construction, with the capacity to use ultra-low sulfur diesel as a backup fuel, a maximum output capacity of 240 MW, using dry low-NOx combustors and water injection as NOx control, and exhausting to stack S1 through S4, respectively

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 15420.0000 BTU KWH

**Emission Limit 2:** 1899.0000 LB MW-HR

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GOOD COMBUSTION PRACTICES

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** CO2e emissions from the entire source shall not exceed 1,115,606 tons per twelve (12) consecutive month period with compliance determined at the end of each month. When using ULSD CO2e emissions limited to 14,588 Btu/kWh and 2,400 lb/MW-hr.

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 9.0000 PPMVD @ 15% O2 (NG) STEADY STATE OPERATIONS

**Emission Limit 2:** 36.2000 LB HR NG STEADY STATE

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 20.0 ppmvd @ 15% O2 (ULSD) 77.3 lb/hr (ULSD) steady state operations. 380 lb/event Startup for natural gas. 1024 lb/event start up for ULSD. startup event duration 20 minutes. 396 lb/event shut down for natural gas 491 lb/event shut down for ULSD. shut down duration 15 minutes. The combined CO emissions from the combustion turbines during start up and shut down events when combusting natural gas shall not exceed 527.67 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The combined CO emissions from the combustion turbines during start up and shut down events when combusting ultra-low sulfur diesel fuel shall not exceed 36.36 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. A startup is defined as the operation in the period beginning when continuous fuel flow to the combustion turbine is initiated and ending when the combustion turbine achieves steady-state operating condition. Steady-state is defined as the period of time and load conditions when the combustion turbine is operating in dry low NOx mode and the combustion turbine is operating in emissions compliance. Shutdown is defined as the period of time the combustion turbine exits steady state operating condition and ending with termination of combustion in each turbine. An event is defined as exactly one (1) startup or exactly one (1) shutdown An aborted startup is defined as a protective trip by an operator or protective software system necessary to avoid damaging the combustion turbine or to avoid a safety issue during an initiated startup where NOX and CO emissions have not yet achieved steady state conditions. When an aborted startup is triggered, and a new startup is initiated, the new startup shall be classified as a separate startup.

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0031 LB MMBTU NG STEADY STATE  
**Emission Limit 2:** 6.6000 LB HR NG STEADY STATE  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) good combustion practices, low sulfur fuels  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 0.0167 lb/MMBtu ULSD steady state. 40.3 lb/hr ULSD steady state 3.0 lb/event startup and 2.0 lb/event shutdown NG. 14 lb/event startup and 12 lb/event shutdown ULSD 20 minute/event startup. 15 minute/event shutdown The combined PM, PM10, and PM2.5 emissions from the combustion turbines during start up and shut down events when combusting natural gas shall not exceed 3.4 tons per year, with compliance determined at the end of each month. The combined PM, PM10, and PM2.5 emissions from the combustion turbines during start up and shut down events when combusting ultra-low sulfur diesel fuel shall not exceed 0.62 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. A startup is defined as the operation in the period beginning when continuous fuel flow to the combustion turbine is initiated and ending when it achieves steady-state operating condition. Steady-state is defined as the period of time and load conditions when the combustion turbine is operating in dry low NOx mode and the combustion turbine is operating in emissions compliance. Shutdown is defined as the period of time the combustion turbine exits steady state operating condition and ending with

termination of combustion in each turbine. An event is defined as exactly one (1) startup or exactly one (1) shutdown. An aborted startup is defined as a protective trip by an operator or protective software system necessary to avoid damaging the combustion turbine or to avoid a safety issue during an initiated startup where NOX and CO emissions have not yet achieved steady state conditions. When an aborted startup is triggered, and a new startup is initiated, the new startup shall be classified as a separate startup.

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0031 LB MMBTU NG STEADY STATE  
**Emission Limit 2:** 6.6000 LB HR (NG) STEADY STATE OPERATIONS  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) good combustion practices and low sulfur fuel content

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 0.0167 lb/MMBtu ULSD steady state. 40.3 lb/hr ULSD steady state 3.0 lb/event startup and 2.0 lb/event shutdown NG. 14 lb/event startup and 12 lb/event shutdown ULSD 20 minute/event startup. 15 minute/event shutdown The combined PM, PM10, and PM2.5 emissions from the combustion turbines during start up and shut down events when combusting natural gas shall not exceed 3.4 tons per year, with compliance determined at the end of each month. The combined PM, PM10, and PM2.5 emissions from the combustion turbines during start up and shut down events when combusting ultra-low sulfur diesel fuel shall not exceed 0.62 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. A startup is defined as the operation in the period beginning when continuous fuel flow to the combustion turbine is initiated and ending when it achieves steady-state operating condition. Steady-state is defined as the period of time and load conditions when the combustion turbine is operating in dry low NOx mode and the combustion turbine is operating in emissions compliance. Shutdown is defined as the period of time the combustion turbine exits steady state operating condition and ending with termination of combustion in each turbine. An event is defined as exactly one (1) startup or exactly one (1) shutdown. An aborted startup is defined as a protective trip by an operator or protective software system necessary to avoid damaging the combustion turbine or to avoid a safety issue during an initiated startup where NOX and CO emissions have not yet achieved steady state conditions. When an aborted startup is triggered, and a new startup is initiated, the new startup shall be classified as a separate startup.

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0031 LB MMBTU NG STEADY STATE

**Emission Limit 2:** 6.6000 LB HR NG STEADY STATE

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) good combustion practices and low sulfur fuel content.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 0.0167 lb/MMBtu ULSD steady state. 40.3 lb/hr ULSD steady state 3.0 lb/event startup and 2.0 lb/event shutdown NG. 14 lb/event startup and 12 lb/event shutdown ULSD 20 minute/event startup. 15 minute/event shutdown The combined PM, PM10, and PM2.5 emissions from the combustion turbines during start up and shut down events when combusting natural gas shall not exceed 3.4 tons per year, with compliance determined at the end of each month. The combined PM, PM10, and PM2.5 emissions from the combustion turbines during start up and shut down events when combusting ultra-low sulfur diesel fuel shall not exceed 0.62 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. A startup is defined as the operation in the period beginning when continuous fuel flow to the combustion turbine is initiated and ending when it achieves steady-state operating condition. Steady-state is defined as the period of time and load conditions when the combustion turbine is operating in dry low NOx mode and the combustion turbine is operating in emissions compliance. Shutdown is defined as the period of time the combustion turbine exits steady state operating condition and ending with termination of combustion in each turbine. An event is defined as exactly one (1) startup or exactly one (1) shutdown. An aborted startup is defined as a protective trip by an operator or protective software system necessary to avoid damaging the combustion turbine or to avoid a safety issue during an initiated startup where NOx and CO emissions have not yet achieved steady state conditions. When an aborted startup is triggered, and a new startup is initiated, the new startup shall be classified as a separate startup.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 9.0000 PPMVD @ 15% O2 (NG) STEADY STATE OPERATIONS

**Emission Limit 2:** 76.2000 LB HR (NG) STEADY STATE OPERATIONS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) dry low-NOx combustors, water injection when using ULSD, good combustion practices, clean fuels

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** 42.0 ppmvd @ 15% O2 (ULSD) 411.4 lb/hr (ULSD) steady state operations. 50 lb/event Startup for natural gas. 100 lb/event start up for ULSD. startup event duration 20 minutes. 30 lb/event shut down for natural gas 83 lb/event shut down for ULSD. shut down duration 15 minutes. The combined NOx emissions from the combustion turbines during start up and shut down events when combusting natural gas shall not exceed 54.40 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The combined NOx emissions from the combustion turbines during start up and shut down events when combusting ultra-low sulfur diesel fuel shall not exceed 4.39 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. A startup is defined as the operation in the period beginning when continuous fuel flow to the combustion turbine is initiated and ending when the combustion turbine achieves steady-state operating condition. Steady-state is defined as the period of time and load conditions when the combustion turbine is operating in dry low NOx mode and the combustion turbine is operating in emissions compliance. Shutdown is defined as the period of time the combustion turbine exits steady state operating condition and ending with termination of combustion in each turbine. An event is defined as exactly one (1) startup or exactly one (1) shutdown An aborted startup is defined as a protective trip by an operator or protective software system necessary to avoid damaging the combustion turbine or to avoid a safety issue during an initiated startup where NOX and CO emissions have not yet achieved steady state conditions. When an aborted startup is triggered, and a new startup is initiated, the new startup shall be classified as a separate startup.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 1.4000 PPMVD @ 15% O2 (NG) STEADY STATE OPERATIONS  
**Emission Limit 2:** 3.5000 LB HR NG STEADY STATE  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) CLEAN FUELS AND GOOD COMBUSTION PRACTICES  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 3.5 ppmvd @ 15% O2 (ULSD) 8.7 lb/hr (ULSD) steady state operations. 54 lb/event Startup for natural gas. 100 lb/event start up for ULSD. startup event duration 20 minutes. 84 lb/event shut down for natural gas 55 lb/event shut down for ULSD. shut down duration 15 minutes. The combined VOC emissions from the combustion turbines during start up and shut down events when combusting natural gas shall not exceed 93.84 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The combined VOC emissions from the combustion turbines during start up and shut down events when combusting ultra-low sulfur diesel fuel shall not exceed 3.72 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. A startup is defined as the operation in the period beginning when continuous fuel flow to the combustion turbine is initiated and ending when the combustion turbine achieves steady-state operating condition. Steady-state is defined as the period of time and load conditions when the combustion turbine is operating in dry low NOx mode and the

combustion turbine is operating in emissions compliance. Shutdown is defined as the period of time the combustion turbine exits steady state operating condition and ending with termination of combustion in each turbine. An event is defined as exactly one (1) startup or exactly one (1) shutdown. An aborted startup is defined as a protective trip by an operator or protective software system necessary to avoid damaging the combustion turbine or to avoid a safety issue during an initiated startup where NOX and CO emissions have not yet achieved steady state conditions. When an aborted startup is triggered, and a new startup is initiated, the new startup shall be classified as a separate startup.

Process/Pollutant Information
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**PROCESS** Dew Point Heater

**NAME:**

**Process Type:** 19.600 (Misc. Boilers, Furnaces, Heaters)

**Primary Fuel:** Natural Gas

**Throughput:** 20.00 MMBtu/hr

**Process Notes:** One (1) natural gas-fired dew point heater, identified as 11, approved in 2025 for construction, with a maximum capacity of 20 MMBtu per hour, using no control, and exhausting to stack S15.

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0048 LB MMBTU

**Emission Limit 2:** 0.1000 LB HR

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GOOD COMBUSTION PRACTICES AND LOW SULFUR FUELS

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0048 LB MMBTU

**Emission Limit 2:** 0.1000 LB HR  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) GOOD COMBUSTION PRACTICES AND LOW SULFUR FUELS  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0048 LB MMBTU  
**Emission Limit 2:** 0.1000 LB HR  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) GOOD COMBUSTION PRACTICES AND LOW SULFUR FUELS  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 50.0000 LB MMCF  
**Emission Limit 2:** 0.9500 LB HR  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GOOD COMBUSTION PRACTICES AND LOW NO<sub>x</sub> BURNERS

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO<sub>2</sub>e)

**CAS Number:** CO<sub>2</sub>e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GOOD COMBUSTION PRACTICES AND LOW SULFUR FUELS

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** The CO<sub>2</sub>e emissions from the entire source shall not exceed 1,115,606 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 84.0000 LB MMCF

**Emission Limit 2:** 1.6000 LB HR

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GOOD COMBUSTION PRACTICES

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.0250 LB MMBTU  
**Emission Limit 2:** 0.5000 LB HR  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) GOOD COMBUSTION PRACTICES  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

### Process/Pollutant Information

**PROCESS NAME:** Black Start Emergency Generators

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** ultra-low sulfur diesel

**Throughput:** 3000.00 kWe, each

**Process Notes:** Four (4) ultra-low diesel fuel-fired black start emergency generators, identified as 7 through 10, approved in 2025 for construction, with a maximum capacity of 3,000 kWe, using no control, and exhausting to stack S7 through S14.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** The CO<sub>2</sub>e emissions from the entire source shall not exceed 1,115,606 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 2.6000 G HP-HR

**Emission Limit 2:** 24.8300 LB HR

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices, low sulfur fuel, and limited operating hours

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.2400 G HP-HR

**Emission Limit 2:** 2.2900 LB HR

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices, low sulfur fuel  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.1500 G HP-HR  
**Emission Limit 2:** 1.4300 LB HR  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion Practices, low sulfur fuel  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.1700 G HP-HR  
**Emission Limit 2:** 1.6500 LB HR  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices, low sulfur fuel

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.1700 G HP-HR  
**Emission Limit 2:** 1.6500 LB HR  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices, low sulfur fuel  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 4.5600 G HP-HR  
**Emission Limit 2:** 43.5500 LB HR  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , NESHAP  
**Control Method:** (P) GOOD COMBUSTION PRACTICES AND LOW SULFUR FUELS  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS** plant emergency generator

**NAME:**

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** ultra-low sulfur diesel

**Throughput:** 1500.00 kWe

**Process Notes:** One (1) ultra-low diesel fuel-fired plant emergency generator, identified as 6, approved in 2025 for construction, with a maximum capacity of 1,500 kWe, using no control, and exhausting to stack S6.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0500 G HP-HR

**Emission Limit 2:** 0.2200 LB HR

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices, low sulfur fuel

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0700 G HP-HR

**Emission Limit 2:** 0.3300 LB HR

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices, low sulfur fuel

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0700 G HP-HR

**Emission Limit 2:** 0.3300 LB HR

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices, low sulfur fuel

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.2400 G HP-HR

**Emission Limit 2:** 1.0600 LB HR

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices, low sulfur fuel

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 4.5600 G HP-HR  
**Emission Limit 2:** 20.2200 LB HR  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , NESHAP  
**Control Method:** (P) good combustion practices and low sulfur fuel  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 2.6000 G HP-HR  
**Emission Limit 2:** 11.5300 LB HR  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices, low sulfur fuel  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) GHG emissions of the plant emergency generator shall be controlled through the use of a good engineering design fuel efficient design, and limited operating hours.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** The CO2e emissions from the entire source shall not exceed 1,115,606 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Process/Pollutant Information
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**PROCESS** emergency fire water pump  
**NAME:**  
**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** ultra-low sulfur diesel  
**Throughput:** 282.00 bhp  
**Process Notes:** One (1) ultra-low diesel fuel-fired emergency fire water pump, identified as 5, approved in 2025 for construction, with a maximum capacity of 282 brake horsepower, using no control, and exhausting to stack S5.

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.1500 G HP-HR  
**Emission Limit 2:** 0.0900 LB HR  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practice, low sulfur fuel

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1700 G HP-HR

**Emission Limit 2:** 0.1100 LB HR

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practice, low sulfur fuel

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1700 G HP-HR

**Emission Limit 2:** 0.1100 LB HR

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices, low sulfur fuel

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 2.8500 G HP-HR  
**Emission Limit 2:** 1.7700 LB HR  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices, low sulfur fuel  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 2.6000 G HP-HR  
**Emission Limit 2:** 1.6200 LB HR  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good Combustion practices, low sulfur fuel  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.1500 G HP-HR  
**Emission Limit 2:** 0.0900 LB HR  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices, low sulfur fuel  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (N)  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** The CO2e emissions from the entire source shall not exceed 1,115,606 tons per twelve (12) consecutive month period with compliance determined at the end of each month. GHG emissions of the emergency fire water pump shall be controlled through the use of a good engineering design, fuel efficient design, and limited operating hours.

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Process/Pollutant Information

**PROCESS** ULSD Storage Tanks

**NAME:**

**Process Type:** 42.005 (Petroleum Liquid Storage in Fixed Roof Tanks)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:** Eight (8) ULSD fuel storage tanks: 2 each have a storage capacity of 1,243,000 gallons 4 each have a storage capacity of 4,346 gallons 1 has a storage capacity of 3,600 gallons; and 1 has a storage capacity of 350 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.3400 TON TWELVE (12) CONSECUTIVE MONTH PERIOD

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Combined ton/year limit. All tanks shall use white tank shells. All tanks should use submerged filling. All tanks shall use good operating practices based on generally accepted industry standards, including but not limited to API 650 Welded Steel Tanks for Oil Storage and API 653 Tank Inspection, Repair, Alteration, and Reconstruction.

Process/Pollutant Information

**PROCESS** Circuit Breakers

**NAME:**

**Process Type:** 99.999 (Other Miscellaneous Sources)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:** Eight (8) Circuit Breakers, collectively identified as 13, approved in 2025 for construction, each with a maximum capacity of 1,601 pounds of SF6, using no control, and exhausting to stack F2.

**POLLUTANT NAME:** Sulfur Hexafluoride  
**CAS Number:** 2551-62-4  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 73.6000 LB TWELVE (12) CONSECUTIVE MONTH PERIOD  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) totally enclosed and pressurized circuit breakers with a design leak rate of no more than 0.5% and a density alarm for leak detection

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Source wide GHG emissions shall not exceed 1,115,606 tons per twelve (12) month consecutive period, with compliance determined at the end of each month.

Process/Pollutant Information
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**PROCESS NAME:** Natural Gas Piping Fugitives  
**Process Type:** 99.999 (Other Miscellaneous Sources)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 65.7000 TONS TWELVE (12) CONSECUTIVE MONTH PERIOD  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**

**Control Method:** (P) Audio, Visual, and Olfactory (AVO) inspection walk-throughs once per day  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Source wide GHG emissions shall not exceed 1,115,606 tons per twelve (12) month consecutive period, with compliance determined at the end of each month.

### Process/Pollutant Information

**PROCESS NAME:** Paved Roads  
**Process Type:** 99.140 (Paved Roads)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, fugitive

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):**

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** All haul roads shall be paved. The paved roads shall be subject to the development, maintenance, and implementation of a fugitive dust control plan, which shall include but not be limited to vacuum sweeping and/or water flushing as necessary per the fugitive dust control plan, weather permitting. The PM/PM10/PM2.5 emissions from the paved roads shall be controlled by implementation of a speed reduction plan consisting of signage limiting speeds to a maximum of 20 mph.

### Facility Information

<b>RBLC ID:</b>	LA-0406 (draft)	<b>Date Determination</b>
<b>Corporate/Company Name:</b>	MITSUBISHI CHEMICAL AMERICA, INC.	<b>Last Updated:</b> 04/23/2025
<b>Facility Name:</b>	MCA GEIMAR SITE	<b>Permit Number:</b> PSD-LA-850
<b>Facility Contact:</b>	HOOTAN HIDAJI 901-381-2312 MCA.AIRPERMIT@M-CHEM.COM	<b>Permit Date:</b> 07/24/2024 (actual)
<b>Facility Description:</b>	A new 385,000 tons/year MMA Production facility	<b>FRS Number:</b> Not Found
<b>Permit Type:</b>	A: New/Greenfield Facility	<b>SIC Code:</b> 2821
<b>Permit URL:</b>		<b>NAICS Code:</b> 325211
<b>EPA Region:</b>	6	<b>COUNTRY:</b> USA
<b>Facility County:</b>	ASCENSION	
<b>Facility State:</b>	LA	
<b>Facility ZIP Code:</b>	70734	
<b>Permit Issued By:</b>	LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name) MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV	
<b>Other Agency Contact Info:</b>	Permit Writer: Dan Nguyen @ 225-219-3395	
<b>Permit Notes:</b>		
<b>Facility-wide Emissions:</b>	<b>Pollutant Name:</b>	<b>Facility-wide Emissions Increase:</b>
	Carbon Monoxide	521.4100 (Tons/Year)
	Nitrogen Oxides (NOx)	129.3900 (Tons/Year)
	Particulate Matter (PM)	39.6000 (Tons/Year)
	Sulfur Oxides (SOx)	1.8400 (Tons/Year)
	Volatile Organic Compounds (VOC)	69.7900 (Tons/Year)

<b>Process/Pollutant Information</b>
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**PROCESS NAME:** CO MeOH Auxiliary Boiler (EQT0001)

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

**Primary Fuel:** natural gas

**Throughput:** 321.00 MM BTU/hr

**Process Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Use of low carbon intensity gaseous fuels. Good combustion and operating practices. Efficiency improvement measures.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MM BTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. SCR + LNB (Normal operation).  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 μ (FPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MM BTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0150 LB/MM BTU 30 DAY ROLLING AVERAGE, NORMAL OPERATION  
**Emission Limit 2:** 0.1300 LB/MM BTU (MSS), HOURLY AVERAGE  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. SCR + LNB (Normal operation). SU/SD without SCR  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 5.0000 PPMVD 3% O2, ANNUAL AVERAGE, NORMAL OPERATION  
**Emission Limit 2:** 10.0000 PPMVD 3% O2, HOURLY AVERAGE  
**Standard Emission:** 500.0000 PPMVD 3% O2, HOURLY AVERAGE, MSS  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. Compliance with 40 CFR 63 Subpart DDDDD. CO oxidation catalyst (Normal operation). SU/SD

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.0027 LB/MM BTU (NATURAL GAS)  
**Emission Limit 2:** 0.0036 LB/MM BTU (FUEL GAS)  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. Compliance with 40 CFR 63 Subpart DDDDD. CO oxidation catalyst (Normal operation).

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** CO MeOH Fired Heater (EQT0002)  
**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** natural gas  
**Throughput:** 105.00 mm btu/hr  
**Process Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of low carbon intensity gaseous fuels. Good combustion and operating practices. Efficiency improvement measures.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0150 LB/MM BTU 30 DAY ROLLING AVERAGE, NORMAL OPERATION

**Emission Limit 2:** 0.1500 LB/MM BTU HOURLY AVERAGE, MSS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. SCR + LNB (Normal operation). SU/SD without SCR

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 5.0000 PPMVD 3% O2, HOURLY AVERAGE, NORMAL OPERATION

**Emission Limit 2:** 500.0000 PPMVD 3% O2, HOURLY AVERAGE, MSS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. CO Oxidation Catalyst (Normal operation). SU/SD

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.0027 LB/MM BTU NATURAL GAS

**Emission Limit 2:** 0.0047 LB/MM BTU FUEL GAS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. CO oxidation catalyst (Normal operation).

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 μ (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**Process/Pollutant Information**

**PROCESS NAME:** MMA Plant HTF Package Heater A/B/C (EQT0003/4/5)

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

**Primary Fuel:** natural gas

**Throughput:** 73.00 mm btu/hr (each)

**Process Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of low carbon intensity gaseous fuels. Good combustion and operating practices. Efficiency improvement measures.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10  $\mu$  (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5  $\mu$  (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.0027 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Use of CO oxidation catalyst. Good combustion practices. Proper equipment (burner) design/operation. Compliance with 40 CFR 63 Subpart DDDDD.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 5.0000 PPMVD 3% O2, HOURLY AVERAGE, NORMAL OPERATION

**Emission Limit 2:** 500.0000 PPMVD 3% O2, HOURLY AVERAGE, MSS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. Compliance with 40 CFR 63 Subpart DDDDD. Use of CO oxidation catalyst (Normal operation). Limit MSS to

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0100 LB/MM BTU 3 ONE-HOUR AVERAGE, NORMAL OPERATION

**Emission Limit 2:** 0.1000 LB/MM BTU HOURLY AVERAGE

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. SCR + LNB (Normal operation). SU/SD without SCR

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

### Process/Pollutant Information

**PROCESS NAME:** Formaline Plant Thermal Oxidizer (EQT0007)

**Process Type:** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))

**Primary Fuel:** natural gas

**Throughput:** 107.25 mm btu/hr

**Process Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of low carbon intensity gaseous fuels. Good combustion and operating practices. Efficiency improvement measures.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10  $\mu$  (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MM BTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NO<sub>x</sub>)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NO<sub>x</sub>) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0350 LB/MM BTU (NORMAL OPERATION)

**Emission Limit 2:** 0.0700 LB/MM BTU (MSS), HOURLY AVERAGE

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. LNB + (SNCR or FGR) (normal operation) and LNB &

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0500 LB/MM BTU (NORMAL OPERATION)  
**Emission Limit 2:** 5.3600 LB/HR (MSS)  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 99.9000 % REMOVAL EFFICIENCY (NORMAL OPERATION)  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. CMS for O2 and temperature during normal operation.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** MMA Plant Thermal Oxidizer (EQT0008)  
**Process Type:** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))  
**Primary Fuel:** natural gas

**Throughput:** 236.24 mm btu/hr

**Process Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO<sub>2</sub>e)

**CAS Number:** CO<sub>2</sub>e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of low carbon intensity gaseous fuels. Good combustion and operating practices. Efficiency improvement measures.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. Equip with baghouses.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. Equip with baghouses.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0550 LB/MM BTU (NORMAL OPERATION)  
**Emission Limit 2:** 0.1500 LB/MM BTU (MSS)  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. LNB + SNCR (normal operation only)  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0

**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0824 LB/MM BTU (NORMAL OPERATION)  
**Emission Limit 2:** 19.4700 LB/HR (MSS)  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 99.9900 % REMOVAL EFFICIENCY (NORMAL OPERATION)

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. CMS for O2 and temperature (normal operation).

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Cooling Tower (EQT0010)

**Process Type:** 64.999 (Other SO2MI Processes)

**Primary Fuel:**

**Throughput:** 2160.00 gpm

**Process Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10  $\mu$  (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 % DRIFT RATE

**Emission Limit 2:** 1505.0000 PPM ANNUAL AVERAGE

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Drift eliminators

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 % DRIFT RATE

**Emission Limit 2:** 1505.0000 PPM ANNUAL AVERAGE

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (A) Drift eliminators

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Compliance with 40 CFR 63.104.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Storage Tanks (EQT0013 - EQT0017)  
**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** EQT0013, EQT0014 = 76,354 gals EQT0015 = 376014 EQT0017 = 13279

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Equip with fixed roofs.  
**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Storage Tanks (EQT0019 - EQT0035)  
**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Equip with fixed roofs. Closed vent system followed by (1) thermal oxidizers and scrubber or (2) flare.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Diesel Emergency Generator (EQT0012)  
**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** diesel  
**Throughput:** 1140.00 hp  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/HP-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Proper equipment design and good combustion practices. Use ultra-low sulfur diesel as fuel. Compliance with 40 CFR 60 Subpart III.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 μ (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/HP-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Proper equipment design and good combustion practices. Use ultra-low sulfur diesel as fuel. Compliance with 40 CFR 60 Subpart III.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 4.8000 G/HP-HR NMEHC + NOX  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Proper equipment design and good combustion practices. Use ultra-low sulfur diesel as fuel. Low emission combustion. Compliance with 40 CFR 60 Subpart IIII.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 2.6000 G/HP-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Proper equipment design and good combustion practices. Use ultra-low sulfur diesel as fuel. Low emission combustion. Compliance with 40 CFR 60 Subpart IIII.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 4.8000 G/HP-HR NMEHC + NOX  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Proper equipment design and good combustion practices. Use ultra-low sulfur diesel as fuel. Compliance with 40 CFR 60 Subpart III.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 1.1600 G/HP-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Proper equipment design and good combustion practices. Use ultra-low sulfur diesel as fuel. Compliance with 40 CFR 60 Subpart III.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Combined Flare (EQT0009)  
**Process Type:** 19.310 (Chemical Plant Flares)  
**Primary Fuel:** natural gas

**Throughput:**

745.37 mm btu/hr

**Process Notes:****POLLUTANT NAME:** Particulate matter, filterable < 10  $\mu$  (FPM10)**CAS Number:** PM**Test Method:** Unspecified**Pollutant Group(s):** ( Particulate Matter (PM) )**Emission Limit 1:****Emission Limit 2:****Standard Emission:****Did factors, other than air pollution technology considerations influence the BACT decisions:** U**Case-by-Case Basis:** BACT-PSD**Other Applicable Requirements:****Control Method:** (P) Compliance with 40 CFR 63.670 and 63.671 as specified in 63.108(a). Use of natural gas for pilot gas/assist gas. Proper equipment design and good combustion practices.**Est. % Efficiency:****Cost Effectiveness:** 0 \$/ton**Incremental Cost Effectiveness:** 0 \$/ton**Compliance Verified:** Unknown**Pollutant/Compliance Notes:****POLLUTANT NAME:** Particulate matter, filterable < 2.5  $\mu$  (FPM2.5)**CAS Number:** PM**Test Method:** Unspecified**Pollutant Group(s):** ( Particulate Matter (PM) )**Emission Limit 1:****Emission Limit 2:****Standard Emission:****Did factors, other than air pollution technology considerations influence the BACT decisions:** U**Case-by-Case Basis:** BACT-PSD**Other Applicable Requirements:****Control Method:** (P) Compliance with 40 CFR 63.670 and 63.671 as specified in 63.108(a). Use of natural gas for pilot gas/assist gas. Proper equipment design and good combustion practices.**Est. % Efficiency:****Cost Effectiveness:** 0 \$/ton**Incremental Cost Effectiveness:** 0 \$/ton**Compliance Verified:** Unknown**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 63.670 and 63.671 as specified in 63.108(a). Use of natural gas for pilot gas/assist gas. Proper equipment design and good combustion practices.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 63.670 and 63.671 as specified in 63.108(a). Use of natural gas for pilot gas/assist gas. Proper equipment design and good combustion practices.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 63.670 and 63.671 as specified in 63.108(a). Use of natural gas for pilot gas/assist gas. Proper equipment design and good combustion practices.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 63.670 and 63.671 as specified in 63.108(a). Use of natural gas for pilot gas/assist gas. Proper equipment design and good combustion practices.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Wastewater Treatment Plant (EQT0011)

**Process Type:** 22.200 (Industrial Wastewater Treatment)  
**Primary Fuel:**  
**Throughput:** 16700.00 gal/hr  
**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Compliance with 40 CFR 63 Subpart G.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Process Vents  
**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (A) Closed vent system followed by combustion devices.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (A) Closed vent system followed by combustion devices.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Plant Road Fugitives (FUG0002)  
**Process Type:** 99.190 (Other Fugitive Dust Sources)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 µ (FPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Pave all in-plant haul roads. Post and limit maximum speed limit at 10 mph. Comply with LAC 33:III.1305.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5  $\mu$  (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Pave all in-plant haul roads. Post and limit maximum speed limit at 10 mph. Comply with LAC 33:III.1305.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
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**PROCESS NAME:** Equipment Leaks

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:**

**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) LDAR permTCEQ28 and 40 CFR 63 Subpart H  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) LDAR program per TCEQ28 and 40 CFR 63 Subpart H  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

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Process/Pollutant Information
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**PROCESS NAME:** POx Unit Start-up Burner (EQT0006)  
**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** natural gas  
**Throughput:** 8.00 mm btu/hr  
**Process Notes:** Operation

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of low carbon intensity gaseous fuels. Good combustion and operating practices. Efficiency improvement measures.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation.

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 μ (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0980 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0820 LB/MM BTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. Compliance with 40 CFR 63 Subpart DDDDD.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.0054 LB/MM BTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of gaseous fuels (fuel gas and/or natural gas). Good combustion practices. Proper equipment (burner) design/operation. Compliance with 40 CFR 63 Subpart DDDDD.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**Facility Information**

<b>RBLC ID:</b>	TX-0973 (final)	<b>Date Determination</b>	
<b>Corporate/Company Name:</b>	SEADRIFT COKE L.P.	<b>Last Updated:</b>	04/08/2025
<b>Facility Name:</b>	SEADRIFT FACILITY	<b>Permit Number:</b>	70898, PSDTX410M4, GHGPSDTX232
<b>Facility Contact:</b>	PAUL FRASER 361-552-8310	<b>Permit Date:</b>	05/03/2024 (actual)
<b>Facility Description:</b>	The amendment authorizes an increase the effective calcined needle coke capacity by approximately 31% and the green coke production capability by approximately 79% based on the 2021 production rates. The following changes are included in the project to provide for the capacity increases: addition of a fourth coke drum; addition of two feedstock tanks and one naphtha tank; addition of one green coke silo and associated dust collector; addition of green coke container loading and conveyor transfer; addition of fugitive components; and associated emission increases from upstream and downstream sources.	<b>FRS Number:</b>	110043798913
<b>Permit Type:</b>	C: Modify process at existing facility	<b>SIC Code:</b>	2999
<b>Permit URL:</b>		<b>NAICS Code:</b>	324199
<b>EPA Region:</b>	6	<b>COUNTRY:</b>	USA
<b>Facility County:</b>	CALHOUN		
<b>Facility State:</b>	TX		
<b>Facility ZIP Code:</b>			
<b>Permit Issued By:</b>	TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name) MS. ANNE INMAN(Agency Contact) (512) 239-1267 anne.inman@tceq.texas.gov		
<b>Other Agency Contact Info:</b>	Mr. Christopher Loughran, P.E., (512) 239-0838, Chris.Loughran@tceq.texas.gov		
<b>Permit Notes:</b>			
<b>Affected Boundaries:</b>	<b>Boundary Type:</b> CLASS1	<b>Class 1 Area State:</b> AR	<b>Boundary:</b> Caney Creek
			<b>Distance:</b> > 250 km

**Process/Pollutant Information**

<b>PROCESS NAME:</b>	Pre-Filtration Heater
<b>Process Type:</b>	13.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)
<b>Primary Fuel:</b>	NATURAL GAS & PLANT GAS
<b>Throughput:</b>	44.00 MMBTU/HR
<b>Process Notes:</b>	

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0260 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Ultra-low NOx burners. Meeting Tier I BACT of 0.01 lb NOx/MMBtu is not cost effective based on the following estimated \$/ton VOC removed in 2023 dollars: Burner retrofit to 0.01 lb NOx/MMBtu:\$39,038/ton NOx removed SCR and Low-NOx burners: >\$50,000/ton NOx removed

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:** 0.2500 GR/100 DSCF  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Firing pipeline-quality natural gas and plant fuel gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e

**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) The heater utilizes treated plant fuel gas or pipeline-quality natural gas as fuel and good combustion practices will be used to reduce emissions including maintaining the proper air-to-fuel ratio, necessary residence time, temperature and turbulent. No previous determinations for carbon capture and collection, transport, compression, and injection of CO2 into underground cavities (i.e., carbon capture and storage or CCS) or low/zero-carbon fuels such as hydrogen or ammonia was listed in the RBLC database for heaters

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

### Process/Pollutant Information

**PROCESS NAME:** PLANT FLARE  
**Process Type:** 19.390 (Other Flares)  
**Primary Fuel:** Treated plant fuel gas or pipeline quali  
**Throughput:** 0  
**Process Notes:** Steam-assisted smokeless plant flare EPN CB-1701

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Comply with 40 CFR 60.18, good combustion practices  
**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) The plant fuel gas is treated by a caustic scrubber which removes H2S in the fuel gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** COKE DRUM DEHEADING  
**Process Type:** 81.190 (Other Coke Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO<sub>2</sub>e)

**CAS Number:** CO<sub>2</sub>e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Hot gas drying, followed by depressurization of each coke drum in an enclosed blowdown system, with uncondensed vapor recovery, to 10 psig or less, prior to discharging the coke drum steam exhaust to the atmosphere

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** FUGITIVES  
**Process Type:** 81.190 (Other Coke Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO<sub>2</sub>e)

**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) 28MID leak detection and repair (LDAR) program (voluntary)  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

## Facility Information

<b>RBLC ID:</b>	IL-0135 (final)	<b>Date Determination</b>
		<b>Last Updated:</b> 02/26/2025
<b>Corporate/Company Name:</b>	NUCOR STEEL KANKAKEE, INC.	<b>Permit Number:</b> 19120024
<b>Facility Name:</b>	NUCOR STEEL KANKAKEE, INC.	<b>Permit Date:</b> 04/30/2024 (actual)
<b>Facility Contact:</b>	DUSTIN LAND 815-939-5525 DUSTINLAND@NUCOR.COM	<b>FRS Number:</b> Not Found
<b>Facility Description:</b>	Nucor Steel Kankakee, Inc. produces steel rods and bars of various shapes and sizes at this plant.	<b>SIC Code:</b> 3312
<b>Permit Type:</b>	D: Both B (Add new process to existing facility) & C (Modify process at existing facility)	<b>NAICS Code:</b> 331111
<b>Permit URL:</b>		
<b>EPA Region:</b>	5	<b>COUNTRY:</b> USA
<b>Facility County:</b>	KANKAKEE	
<b>Facility State:</b>	IL	
<b>Facility ZIP Code:</b>	60914	
<b>Permit Issued By:</b>	ILLINOIS EPA, BUREAU OF AIR (Agency Name) MR. RAY PILAPIL(Agency Contact) (217) 782-2113 ray.pilapil@illinois.gov	
<b>Permit Notes:</b>	This permitting action is a revision to the existing Construction Permit 19120024 issued in 2021 for an Improvement Project. The revisions to this permit include installation of two additional ladle preheaters and changes to plant roadways.	
<b>Facility-wide Emissions:</b>	<b>Pollutant Name:</b>	<b>Facility-wide Emissions Increase:</b>
	Carbon Monoxide	1249.0000 (Tons/Year)
	Nitrogen Oxides (NOx)	194.2500 (Tons/Year)
	Particulate Matter (PM)	242.8600 (Tons/Year)

Sulfur Oxides (SO<sub>x</sub>)  
Volatile Organic Compounds (VOC)

214.4800 (Tons/Year)  
177.0000 (Tons/Year)

Process/Pollutant Information
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**PROCESS NAME:** Two Ladle Preheaters  
**Process Type:** 81.220 (Hot Metal Transfer & Ladle Processes)  
**Primary Fuel:** Natural Gas  
**Throughput:** 7.50 mmBtu/hr  
**Process Notes:** Each ladle preheater has a heat input of 7.5 mmBtu/hr.

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** Limit also addresses total PM2.5

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** EPA/OAR Mthd 7

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0800 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (A) Low-NOx burners; good combustion practices; and natural gas fuel

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** EPA/OAR Mthd 25

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.0054 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices; natural gas fuel

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** No  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** EPA/OAR Mthd 10  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0820 LB/MMBTU 3-HR AVERAGE  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices; natural gas fuel  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** No  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:** 0.0005 LB/MMBTU 3-HR AVERAGE  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Natural gas fuel; good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** No  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU 3-HR AVERAGE  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Energy efficient design; natural gas fuel  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** No  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
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**PROCESS NAME:** Roadways (New Roadway Segment)  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 27.2800 TONS YEAR  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**

**Control Method:** (P) Roadways must be paved; implementation of preventative measures, including posting 15 mph speed limit and good work practices (e.g., water flushing, vacuuming, sweeping, and opacity of fugitive emissions not to exceed 10 percent).

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 5.4600 TONS YEAR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Roadways must be paved; implementation of preventative measures, including posting 15 mph speed limit and good work practices (e.g., water flushing, vacuuming, sweeping, and opacity of fugitive emissions not to exceed 10 percent).

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.3400 TONS YEAR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Roadways must be paved; implementation of preventative measures, including posting 15 mph speed limit and good work practices (e.g., water flushing, vacuuming, sweeping, and opacity of fugitive emissions not to exceed 10 percent).

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

## Facility Information

<b>RBLC ID:</b>	AR-0185 (final)	<b>Date Determination</b>	
		<b>Last Updated:</b>	02/26/2025
<b>Corporate/Company Name:</b>	HYBAR LLC	<b>Permit Number:</b>	2470-AOP-R1
<b>Facility Name:</b>	HYBAR LLC	<b>Permit Date:</b>	04/11/2024 (actual)
<b>Facility Contact:</b>		<b>FRS Number:</b>	Not Found
<b>Facility Description:</b>		<b>SIC Code:</b>	3312
<b>Permit Type:</b>	B: Add new process to existing facility	<b>NAICS Code:</b>	331111
<b>Permit URL:</b>	<a href="https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/2470-AOP-R1.pdf">https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/2470-AOP-R1.pdf</a>		
<b>EPA Region:</b>	6	<b>COUNTRY:</b>	USA
<b>Facility County:</b>	MISSISSIPPI		
<b>Facility State:</b>	AR		
<b>Facility ZIP Code:</b>	72370		
<b>Permit Issued By:</b>	ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name) MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheume@adeq.state.ar.us		
<b>Permit Notes:</b>	Hybar LLC owns and operates a rebar steel mill located at the intersection of Arkansas Highway 239 and County Road 732. This permitting action is a modification to the initial PSD review including two natural gas fired Tundish Preheaters, SN-41. The permitted emission increases as a result of this modification are as follows: 0.4 tpy PM/PM10/PM2.5, 0.1 tpy SO2, 0.3 tpy VOC, 4.4 tpy CO, 5.1 tpy NOX, 2.58E-05 tpy Lead, 6150 tpy CO2e, 0.01 tpy Single HAP, and 0.01 Total HAP.		
<b>Facility-wide Emissions:</b>	<b>Pollutant Name:</b>	<b>Facility-wide Emissions Increase:</b>	
	Carbon Monoxide	4.4000 (Tons/Year)	
	Nitrogen Oxides (NOx)	5.1000 (Tons/Year)	
	Particulate Matter (PM)	0.4000 (Tons/Year)	
	Sulfur Oxides (SOx)	0.1000 (Tons/Year)	
	Volatile Organic Compounds (VOC)	0.3000 (Tons/Year)	

## Process/Pollutant Information

**PROCESS NAME:** Tundish Preheaters

**Process Type:** 81.290 (Other Steel Manufacturing Processes)

**Primary Fuel:** Natural Gas

**Throughput:** 12.00 MMBtu/hr

**Process Notes:** SN-41

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Visible Emissions (VE)  
**CAS Number:** VE  
**Test Method:** Unspecified  
**Pollutant Group(s):**  
**Emission Limit 1:** 5.0000 %  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:** 0.0006 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0824 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0970 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Low NOx burners Combustion of clean fuel Good Combustion Practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

## Facility Information

<b>RBLC ID:</b>	AR-0183 (final)	<b>Date Determination</b>
<b>Corporate/Company Name:</b>	BIG RIVER STEEL LLC	<b>Last Updated:</b> 02/26/2025
<b>Facility Name:</b>	BIG RIVER STEEL LLC	<b>Permit Number:</b> 2305-AOP-R8
<b>Facility Contact:</b>		<b>Permit Date:</b> 02/08/2024 (actual)
<b>Facility Description:</b>		<b>FRS Number:</b> 110071427063
<b>Permit Type:</b>	D: Both B (Add new process to existing facility) & C (Modify process at existing facility)	<b>SIC Code:</b> 3312
<b>Permit URL:</b>	<a href="https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/2305-AOP-R8.pdf">https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/2305-AOP-R8.pdf</a>	<b>NAICS Code:</b> 331111
<b>EPA Region:</b>	6	<b>COUNTRY:</b> USA

**Facility County:** MISSISSIPPI  
**Facility State:** AR  
**Facility ZIP Code:** 72370  
**Permit Issued By:** ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name)  
MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheume@adeq.state.ar.us

**Permit Notes:**

<b>Facility-wide Emissions:</b>	<b>Pollutant Name:</b>	<b>Facility-wide Emissions Increase:</b>
	Carbon Monoxide	164.8000 (Tons/Year)
	Nitrogen Oxides (NOx)	143.3000 (Tons/Year)
	Particulate Matter (PM)	44.2000 (Tons/Year)
	Sulfur Oxides (SOx)	2.2000 (Tons/Year)
	Volatile Organic Compounds (VOC)	13.6000 (Tons/Year)

**Process/Pollutant Information**

**PROCESS NAME:** RH Degasser Boiler  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:** Natural Gas  
**Throughput:** 0  
**Process Notes:** SN-04

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** EPA/OAR OTM 27 and Mthd 202  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
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**PROCESS NAME:** Pickle Line Boiler  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:** SN-22

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Galvanizing Line Boilers  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-26 and SN-27

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice  
**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Annealing Pickling Line Boiler  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-101

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of Natural gas and Good Combustion Practice  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Color Coating Line RTO  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-108D

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0090 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0090 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0090 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Visible Emissions (VE)  
**CAS Number:** VE  
**Test Method:** Unspecified  
**Pollutant Group(s):**  
**Emission Limit 1:** 5.0000 %  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.0210 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.8500 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

### Process/Pollutant Information

**PROCESS NAME:** Color Coating Line Spray Passivation

**Process Type:** 81.290 (Other Steel Manufacturing Processes)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:** SN-108E

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Visible Emissions (VE)  
**CAS Number:** VE  
**Test Method:** Unspecified  
**Pollutant Group(s):**  
**Emission Limit 1:** 5.0000 %  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0824 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**PROCESS NAME:** Space Heaters  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-112 through SN-119

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

**Test Method:** Unspecified

**Pollutant Group(s):**

**Emission Limit 1:** 5.0000 %

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0824 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0800 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Cold Mill Boiler NGO Line

**Process Type:** 81.290 (Other Steel Manufacturing Processes)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

**Test Method:** Unspecified

**Pollutant Group(s):**

**Emission Limit 1:** 5.0000 %

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0824 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0350 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 117.0000 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Pots for GL Curing and Melting

**Process Type:** 81.290 (Other Steel Manufacturing Processes)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:** SN-121 through SN-123

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

**Test Method:** Unspecified

**Pollutant Group(s):**

**Emission Limit 1:** 5.0000 %

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0824 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0800 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 117.0000 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Stingray Parts Washer  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-124

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Visible Emissions (VE)  
**CAS Number:** VE  
**Test Method:** Unspecified  
**Pollutant Group(s):**  
**Emission Limit 1:** 5.0000 %  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0824 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0800 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Cold Mill Boiler  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-125

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

**Test Method:** Unspecified

**Pollutant Group(s):**

**Emission Limit 1:** 5.0000 %

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0824 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0350 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Color Coating Line Boiler

**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-126

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

**Test Method:** Unspecified

**Pollutant Group(s):**

**Emission Limit 1:** 5.0000 %

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0824 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0350 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU  
**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices Energy efficient burners Combustion of natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Cooling Towers

**Process Type:** 81.290 (Other Steel Manufacturing Processes)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:** SN-109B, SN-129 through SN-132

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 % DRIFT LOSS

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (A) Drift Eliminators Low TDS

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0005 % DRIFT LOSS  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (A) Drift Eliminators Low TDS  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0005 % DRIFT LOSS  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (A) Drift Eliminators Low TDS  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE  
**Test Method:** Unspecified  
**Pollutant Group(s):**  
**Emission Limit 1:** 5.0000 %

**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (A) Drift Eliminators Low TDS  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** SMAC Dust Collectors  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-127A, B, and C

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0020 GR/DSCF  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0020 GR/DSCF  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0020 GR/DSCF  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Visible Emissions (VE)  
**CAS Number:** VE  
**Test Method:** Unspecified  
**Pollutant Group(s):**

**Emission Limit 1:** 5.0000 %  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

## Facility Information

<b>RBLC ID:</b>	IN-0371 (final)	<b>Date Determination Last Updated:</b>												
<b>Corporate/Company Name:</b>		<b>Permit Number:</b>												
<b>Facility Name:</b>	WABASH VALLEY RESOURCES, LLC	<b>Permit Date:</b>												
<b>Facility Contact:</b>	DAN WILLIAMS 812-281-2802 DWILLIAMS@WVRESC.COM	<b>FRS Number:</b>												
<b>Facility Description:</b>		<b>SIC Code:</b>												
<b>Permit Type:</b>	D: Both B (Add new process to existing facility) &C (Modify process at existing facility)	<b>NAICS Code:</b>												
<b>Permit URL:</b>	<a href="https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&amp;dID=83577932&amp;dDocName=83581976&amp;Rendition=web&amp;allowInterrupt=1&amp;noSaveAs">https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&amp;dID=83577932&amp;dDocName=83581976&amp;Rendition=web&amp;allowInterrupt=1&amp;noSaveAs</a>	<b>COUNTRY:</b>												
<b>EPA Region:</b>	5													
<b>Facility County:</b>	VIGO													
<b>Facility State:</b>	IN													
<b>Facility ZIP Code:</b>	47885													
<b>Permit Issued By:</b>	INDIANA DEPT OF ENV MGMT, OFC OF AIR (Agency Name) MR. MATT STUCKEY(Agency Contact) (317) 233-0203 mstuckey@idem.in.gov													
<b>Permit Notes:</b>														
<b>Facility-wide Emissions:</b>	<table border="0"> <tr> <td><b>Pollutant Name:</b></td> <td><b>Facility-wide Emissions Increase:</b></td> </tr> <tr> <td>Carbon Monoxide</td> <td>1786.7800 (Tons/Year)</td> </tr> <tr> <td>Nitrogen Oxides (NOx)</td> <td>428.8700 (Tons/Year)</td> </tr> <tr> <td>Particulate Matter (PM)</td> <td>34.6800 (Tons/Year)</td> </tr> <tr> <td>Sulfur Oxides (SOx)</td> <td>1087.0500 (Tons/Year)</td> </tr> <tr> <td>Volatile Organic Compounds (VOC)</td> <td>38.5300 (Tons/Year)</td> </tr> </table>	<b>Pollutant Name:</b>	<b>Facility-wide Emissions Increase:</b>	Carbon Monoxide	1786.7800 (Tons/Year)	Nitrogen Oxides (NOx)	428.8700 (Tons/Year)	Particulate Matter (PM)	34.6800 (Tons/Year)	Sulfur Oxides (SOx)	1087.0500 (Tons/Year)	Volatile Organic Compounds (VOC)	38.5300 (Tons/Year)	
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Sulfur Oxides (SOx)	1087.0500 (Tons/Year)													
Volatile Organic Compounds (VOC)	38.5300 (Tons/Year)													

## Process/Pollutant Information

**PROCESS NAME:** Integrated Gasification Combined Cycle Combustion Turbine  
**Process Type:** 15.210 (Natural Gas (includes propane & liquified petroleum gas))  
**Primary Fuel:** Natural Gas  
**Throughput:** 2292.00 MMBtu/hr  
**Process Notes:** Can also combust hydrogen syngas and mixtures of natural gas/hydrogen syngas

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 2.0000 PPMV 15% OXYGEN WHEN COMBUSTING >50% NAT. GAS  
**Emission Limit 2:** 16.5000 LB/HR WHEN COMBUSTING >50% NAT. GAS  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Steam Injection/SCR and Good Combustion Practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** NOx emissions shall not exceed 8 ppmv @ 15% O2 and 52.0 lb/hr when combusting greater than 50% hydrogen.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 110.0000 LB/MMBTU  
**Emission Limit 2:** 1065780.0000 TONS OF CO2 PER TWELVE (12) CONSECUTIVE MONTH PERIOD  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good Combustion Practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Auxiliary Boiler (AB-3)  
**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** Natural Gas  
**Throughput:** 20.00 MMBtu/hr

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 35.0000 LB/MMSCF

**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Low NOx burners and Good Combustion Practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU

**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good Combustion Practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**Process/Pollutant Information**

**PROCESS NAME:** Dewpoint Heater

**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

**Primary Fuel:** Natural Gas

**Throughput:** 1.44 MMBtu/hr

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 50.0000 LB/MMSCF

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Low NOx burners and good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 117.0000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good Combustion Practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Emergency Generator (400 kW)  
**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** Diesel  
**Throughput:** 619.00 HP  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 2.2900 G/HP-HR  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS  
**Control Method:** (P) Good Combustion Practices and meeting NSPS Subpart IIII requirements.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 180.0000 TONS PER TWELVE (12) CONSECUTIVE MONTH PERIOD  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good Combustion Practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Emergency Generator (1000 kW)  
**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** Diesel  
**Throughput:** 1000.00 kW  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 3.8100 G/HP-HR  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS  
**Control Method:** (P) Good Combustion Practices and meeting NSPS Subpart IIII requirements.

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 389.0000 TONS PER TWELVE (12) CONSECUTIVE MONTH PERIOD  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good Combustion Practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Emergency Generator (2000 kW)  
**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** Diesel  
**Throughput:** 2000.00 kW  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 3.8100 G/HP-HR  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS  
**Control Method:** (P) Good Combustion Practices and meeting NSPS Subpart III requirements.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 778.0000 TONS PER TWELVE (12) CONSECUTIVE MONTH PERIOD  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good Combustion Practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Ammonia Catalyst Startup Heater  
**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** Natural Gas  
**Throughput:** 29.01 MMBtu/hr  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102

**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 50.0000 LB/MMSCF  
**Emission Limit 2:** 14.2200 MMCF PER TWELVE (12) CONSECUTIVE MONTH PERIOD  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (A) Low NOx Burners  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU  
**Emission Limit 2:** 14.2200 MMCF PER TWELVE (12) CONSECUTIVE MONTH PERIOD  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good Combustion Practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Ammonia Process Flare  
**Process Type:** 19.390 (Other Flares)  
**Primary Fuel:** Natural Gas

**Throughput:** 4.00 MMBtu/hr

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0680 LB/MMBTU DURING NORMAL OPERATION  
**Emission Limit 2:** 143.2100 LB/HR DURING VENTING OPERATIONS  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) The pilot and purge gas fuels shall be natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Venting to the Ammonia Process Flare shall not exceed 336 hours per twelve consecutive month period with compliance determined at the end of each month. The Permittee shall comply with the following flare minimization practices to reduce emissions during startups, shutdowns, and other flaring events: (1) Flare Use Minimization: Maximize the use of process syngas during the startup of the ammonia unit; (2) The Permittee shall train all operators responsible for the day-to-day operation of the flares on the flare minimization practices and the specific procedures to follow during process startup, shut down, and other flaring events; and (3) The Permittee shall investigate the "root cause" of malfunction events that cause flaring events other than at startup or shut down. This root cause analysis shall identify the apparent cause of unanticipated flaring event and shall recommend additional preventive measures that will minimize the chance of a repeat event. The Permittee shall implement the recommended preventive measures. (d) Flare emissions shall be controlled by use of the following practices: (1) Flares shall be operated with a flame present at all times; and (2) Flares shall be continuously monitored to assure the presence of a pilot flame with a thermocouple, infrared monitor, or other approved device.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU DURING NORMAL OPERATION  
**Emission Limit 2:** 336.0000 HOURS PER TWELVE (12) CONSECUTIVE MONTH PERIOD  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) The pilot and purge gas fuels shall be natural gas.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** (c) The Permittee shall comply with the following flare minimization practices to reduce emissions during startups, shut downs, and other flaring events: (1) Flare Use Minimization: Maximize the use of process syngas during the startup of the Ammonia Unit; (2) The Permittee shall train all operators responsible for the day-to-day operation of the flares on the flare minimization practices and the specific procedures to follow during process startup, shut down, and other flaring events; and (3) The Permittee shall investigate the "root cause" of malfunction events that cause flaring events other than at startup or shut down. This root cause analysis shall identify the apparent cause of unanticipated flaring event and shall recommend additional preventive measures that will minimize the chance of a repeat event. The Permittee shall implement the recommended preventive measures. (d) Flare emissions shall be controlled by use of the following practices: (1) Flares shall be operated with a flame present at all times; and (2) Flares shall be continuously monitored to assure the presence of a pilot flame with a thermocouple, infrared monitor, or other approved device.

Process/Pollutant Information

**PROCESS NAME:** Ammonia Tank Flare  
**Process Type:** 19.390 (Other Flares)  
**Primary Fuel:** Natural Gas  
**Throughput:** 1.40 MMBtu/hr

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0680 LB/MMBTU DURING NORMAL OPERATION  
**Emission Limit 2:** 60.8300 LB/HR DURING VENTING OPERATIONS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and pilot and purge gas fuels shall be natural gas.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** (b) Venting to the ammonia tank flare shall not exceed 168 hours per twelve consecutive month period with compliance determined at the end of each month. (c) The Permittee shall comply with the following flare minimization practices to reduce emissions during startups, shutdowns, and other flaring events: (1) Flare Use Minimization: The Permittee shall limit periods when the backup storage compressor and the ammonia refrigeration compressor are offline at the same time to the extent practicable; (2) The Permittee shall train all operators responsible for the day-to-day operation of the flares on the flare minimization practices and the specific procedures to follow during process startup, shut down, and other flaring events; and (3) The Permittee shall investigate the "root cause" of malfunction events that cause flaring events other than at startup or shut down. This root cause analysis shall identify the apparent cause of unanticipated flaring event and shall recommend additional preventive measures that will minimize the chance of a repeat event. The Permittee shall implement the recommended preventive measures. (d) Flare emissions shall be controlled by use of the following practices: (1) Flare shall be designed for and operated with no visible emissions, except for periods not to exceed 5 minutes during any two consecutive hours; (2) Flare shall be operated with a flame present at all times; and (3) Flare shall be continuously monitored to assure the presence of a pilot flame with a thermocouple, infrared monitor, or other approved device.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 168.0000 HOURS VENTING PER TWELVE (12) CONSECUTIVE MONTH PERIOD

**Emission Limit 2:** 117.0000 LB/MMBTU DURING NORMAL OPERATIONS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and pilot and purge gas fuels used shall be natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** (c) The Permittee shall comply with the following flare minimization practices to reduce emissions during startups, shutdowns, and other flaring events: (1) Flare Use Minimization: The Permittee shall limit periods when the backup storage compressor and the ammonia refrigeration compressor are offline at the same time to the extent practicable; (2) The Permittee shall train all operators responsible for the day-to-day operation of the flare on the flare minimization practices and the specific procedures to follow during process startup, shut down, and other flaring events; and (3) The Permittee shall investigate the "root cause" of malfunction events that cause flaring events other than at startup or shut down. This root cause analysis shall identify the apparent cause of unanticipated flaring event and shall recommend additional preventive measures that will minimize the chance of a repeat event. The Permittee shall implement the recommended preventive measures. (d) Flare emissions shall be controlled by use of the following practices: (1) Flare shall be designed for and operated with no visible emissions, except for periods not to exceed 5 minutes during any two consecutive hours; (2) Flare shall be operated with a flame present at all times; and (3) Flare shall be continuously monitored to assure the presence of a pilot flame

with a thermocouple, infrared monitor, or other approved device.

Process/Pollutant Information
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**PROCESS NAME:** Ammonia Plant Emergency Generator  
**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** Diesel  
**Throughput:** 500.00 kW

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 4.8000 G/HP-HR  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS  
**Control Method:** (P) Good Combustion Practices and meeting NSPS Subpart IIII requirements.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 219.0000 TONS PER TWELVE (12) CONSECUTIVE MONTH PERIOD  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**

**Control Method:** (P) Good Combustion Practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Auxiliary Boiler (Unit 1C)  
**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** Natural Gas  
**Throughput:** 217.65 MMBtu/hr  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0100 LB/MMBTU  
**Emission Limit 2:** 1183.5000 MMCF PER TWELVE (12) CONSECUTIVE MONTH PERIOD  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Low NOx burner and SCR with good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU  
**Emission Limit 2:** 1183.5000 MMCF PER TWELVE (12) CONSECUTIVE MONTH PERIOD

**Standard Emission:****Did factors, other than air pollution technology considerations influence the BACT decisions:** U**Case-by-Case Basis:** BACT-PSD**Other Applicable Requirements:****Control Method:** (P) Good Combustion Practices**Est. % Efficiency:****Cost Effectiveness:** 0 \$/ton**Incremental Cost Effectiveness:** 0 \$/ton**Compliance Verified:** Unknown**Pollutant/Compliance Notes:****Facility Information**

<b>RBLC ID:</b>	IL-0134 (final)	<b>Date Determination</b>	
<b>Corporate/Company Name:</b>	CRONUS CHEMICALS, LLC	<b>Last Updated:</b>	02/26/2025
<b>Facility Name:</b>	CRONUS CHEMICALS	<b>Permit Number:</b>	19110020
<b>Facility Contact:</b>	DONALD GILL FRED.GILL@CRONUSCHEM.COM	<b>Permit Date:</b>	12/21/2023 (actual)
<b>Facility Description:</b>	Chemical plant producing ammonia using natural gas as both a feedstock and a fuel. The nominal production capacity of the plant would be 3,031 tons/day of ammonia.	<b>FRS Number:</b>	110067236583
<b>Permit Type:</b>	A: New/Greenfield Facility	<b>SIC Code:</b>	2873
<b>Permit URL:</b>	<a href="https://webapps.illinois.gov/EPA/WebSiteApi/api/PublicNotices/GetAirPermitDocument/9285">https://webapps.illinois.gov/EPA/WebSiteApi/api/PublicNotices/GetAirPermitDocument/9285</a>	<b>NAICS Code:</b>	325311
<b>EPA Region:</b>	5	<b>COUNTRY:</b>	USA
<b>Facility County:</b>	DOUGLAS		
<b>Facility State:</b>	IL		
<b>Facility ZIP Code:</b>	61953		
<b>Permit Issued By:</b>	ILLINOIS EPA, BUREAU OF AIR (Agency Name) MR. RAY PILAPIL(Agency Contact) (217) 782-2113 ray.pilapil@illinois.gov		
<b>Other Agency Contact</b>	Justin Cameron 217-558-3934		
<b>Info:</b>			
<b>Permit Notes:</b>			
<b>Facility-wide Emissions:</b>	<b>Pollutant Name:</b> Carbon Monoxide Nitrogen Oxides (NOx) Particulate Matter (PM) Sulfur Oxides (SOx) Volatile Organic Compounds (VOC)	<b>Facility-wide Emissions Increase:</b> 185.5000 (Tons/Year) 104.7000 (Tons/Year) 21.2000 (Tons/Year) 4.0000 (Tons/Year) 44.7000 (Tons/Year)	

Process/Pollutant Information

**PROCESS NAME:** Ammonia Plant - CO2 Vent, Reformer Furnace and Boilers

**NAME:**

**Process Type:** 62.999 (Other Inorganic Chemical Manufacturing Sources)

**Primary Fuel:** Natural Gas

**Throughput:** 3031.00 tons/day of ammonia produced

**Process Notes:** BACT for GHG for the ammonia plant is based on emissions from the CO2 Vent, the Reformer Furnace and the Boilers because all of these units are integrated in the production of ammonia.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 1.8400 TON/TON OF AMMONIA ANNUAL AVERAGE

**Emission Limit 2:** 6143.0000 TONS/DAY DURING COMMISSIONING/SHAKEDOWN PERIOD

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Energy efficient plant design, good operating practices, good combustion practices for Reformer Furnace and Boilers, automated combustion management systems with oxygen trim systems for the Reformer Furnace and Boilers

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Limit 1 is for the combination of the CO2 Vent, the Reformer Furnace and the Boilers

Process/Pollutant Information

**PROCESS NAME:** CO2 Vent

**Process Type:** 62.999 (Other Inorganic Chemical Manufacturing Sources)

**Primary Fuel:**

**Throughput:** 3031.00 tons/day of ammonia

**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.0520 LB/TON OF AMMONIA 3-HR ROLLING AVERAGE  
**Emission Limit 2:** 156.0000 LB/DAY DURING COMMISSIONING/SHAKEDOWN PERIOD  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of amine solution as CO2 liquid catalyst/activator, good operating practices, process and equipment design

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0089 LB/TON OF AMMONIA 3-HR ROLLING AVERAGE

**Emission Limit 2:** 27.0000 LB/DAY DURING COMMISSIONING/SHAKEDOWN PERIOD

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Process and equipment design, good operating practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (N)  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** See limit for GHG from Ammonia Plant

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Front End Flare  
**Process Type:** 19.310 (Chemical Plant Flares)  
**Primary Fuel:** Natural Gas  
**Throughput:** 2.22 mmBtu/hr  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 LB/MMBTU PILOT  
**Emission Limit 2:** 0.0680 LB/MMBTU SSM FLARING  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Flare minimization plan and root cause analysis, smokeless, steam-assist flare design, work practices in accordance with 40 CFR 63.11(b), GCP, nitrogen purge gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Also 10.57 tons/yr (both pilot and SSM) and 10.57 tons/bi-monthly period during commissioning/shutdown period

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0800 LB/MMBTU PILOT  
**Emission Limit 2:** 0.3100 LB/MMBTU SSM FLARING  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist flare design, Work Practices in accordance with 40 CFR 63.11(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Also 43.28 tons/year (both Pilot and SSM) and 43.28 tons/bi-month period during commissioning/shutdown period

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.0054 LB/MMBTU PILOT  
**Emission Limit 2:** 0.0100 LB/MMBTU SSM FLARING  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist flare design, Work Practices in accordance with 40 CFR 63.11(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Also 1.48 tons/year (both Pilot and SSM) and 1.48 tons/bi-month period during commissioning/shakedown period

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU PILOT

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist, smokeless flare design, Work Practices in accordance with 40 CFR 63.11(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Also 0.10 tons/year and 0.10 ton/bi-month period during commissioning/shakedown period

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist, smokeless flare design, Work Practices in accordance with 40 CFR 63.11(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Also 0.10 tons/year and 0.10 tons/bi-month period during commissioning/shakedown period

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 18603.0000 TONS/YEAR PILOT AND SSM FLARING  
**Emission Limit 2:** 18603.0000 TONS/BI-MONTH PERIOD PILOT AND SSM DURING COM./SHAKEDOWN PER.  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist flare design, Work Practices in accordance with 40 CFR 63.11(b), GCP, use of nitrogen as purge gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Ammonia Flare  
**Process Type:** 19.310 (Chemical Plant Flares)  
**Primary Fuel:** Natural Gas  
**Throughput:** 2.22 mmBtu/hr  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 LB/MMBTU PILOT  
**Emission Limit 2:** 0.0680 LB/MMBTU SSM FLARING  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist flare design, Work Practices in accordance with 40 CFR 63.11(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Also 8.97 tons/year (Pilot and SSM) and 8.97 tons/bi-month period (Pilot and SSM) during commissioning/shakedown period

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0800 LB/MMBTU PILOT

**Emission Limit 2:** 0.3100 LB/MMBTU SSM FLARING

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist flare design, Work Practices in accordance with 40 CFR 63.11(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Also 35.87 tons/year (Pilot and SSM) and 35.87 tons/bi-month period (Pilot and SSM) during commissioning/shakedown period

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.0054 LB/MMBTU PILOT

**Emission Limit 2:** 0.0100 LB/MMBTU SSM FLARING

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist flare design, Work Practices in accordance with 40 CFR 63.11(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Also 0.69 tons/year (Pilot and SSM) and 0.69 tons/bi-month period (Pilot and SSM) during commissioning/shakedown period

**POLLUTANT NAME:** Particulate matter, total < 10 µ (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU PILOT

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist, smokeless flare design, Work Practices in accordance with 40 CFR 63.11(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Also 0.07 tons/year and 0.07 tons/bi-month period during commissioning/shakedown period

**POLLUTANT NAME:** Particulate matter, total < 2.5 µ (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU PILOT

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist, smokeless flare design, Work Practices in accordance with 40 CFR 63.11(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Also 0.07 tons/year and 0.07 tons/bi-month period during commissioning/shakedown period

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 16093.0000 TONS/YEAR PILOT AND SSM FLARING  
**Emission Limit 2:** 16093.0000 TONS/BI-MONTH PERIOD PILOT AND SSM DURING COM./SHAKEDOWN PER.  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist flare design, Work Practices in accordance with 40 CFR 63.11(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Reformer Furnace  
**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** Natural Gas  
**Throughput:** 1096.00 mmBtu/hr  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** EPA/OAR Mthd 7E  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0109 LB/MMBTU 30-DAY ROLLING AVG  
**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Low-NOx Burners (LNB) and Selective Catalytic Reduction (SCR)

**Est. % Efficiency:** 85.000

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Compliance demonstrated using NOx CEMS

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0194 LB/MMBTU 3-HR AVG

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GCP

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Compliance demonstrated using a CO CEMS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.0014 LB/MMBTU 3-HR AVG

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GCP  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Compliance demonstrated by stack testing

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM  
**Test Method:** EPA/OAR Mthd 201A and 202  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0024 LB/MMBTU 3-HR AVG  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GCP  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Compliance demonstrate by stack testing

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM  
**Test Method:** Other  
**Other Test Method:** 201A and 202  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0024 LB/MMBTU 3-HR AVG  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GCP

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Compliance demonstrated by stack testing

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** See limit for GHG for Ammonia Plant

### Process/Pollutant Information

**PROCESS NAME:** Boilers  
**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** Natural Gas  
**Throughput:** 179.40 mmBtu/hr  
**Process Notes:** Two 179.4 mmBtu/hr boilers

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** EPA/OAR Mthd 7E  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0100 LB/MMBTU 3-HR AVG  
**Emission Limit 2:** 1.7900 LB/HR, EACH DURING STARTUP OR SHUTDOWN OF A BOILER  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) LNB and SCR

**Est. % Efficiency:** 85.000

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Compliance with Limit 1 demonstrated by NOx CEMS

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0013 LB/MMBTU 3-HR AVG

**Emission Limit 2:** 0.2300 LB/HR, EACH DURING STARTUP OR SHUTDOWN OF A BOILER

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Oxidation Catalysts, GCP and good burner design

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Compliance with Limit 1 demonstrated using CO CEMS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Other

**Other Test Method:** Method 18 or 25A

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.0014 LB/MMBTU 3-HR AVG

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Oxidation Catalysts, GCP and good burner design  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Compliance demonstrated by stack testing

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM  
**Test Method:** EPA/OAR Mthd 201 and 202  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0019 LB/MMBTU 3-HR AVG  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GCP and good burner design  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Compliance demonstrated by stack testing

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM  
**Test Method:** Other  
**Other Test Method:** 201A and 202  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0010 LB/MMBTU 3-HR AVG  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GCP and good burner design

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Compliance demonstrated by stack testing

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** See limit for GHG for Ammonia Plant

### Process/Pollutant Information

**PROCESS NAME:** Startup Heater  
**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** Natural Gas  
**Throughput:** 47.70 mmBtu/hr  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** EPA/OAR Mthd 7E  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0700 LB/MMBTU 3-HR AVG  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) LNB, good burner design, and GCP  
**Est. % Efficiency:** 80.000  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Compliance demonstrated by stack testing

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** EPA/OAR Mthd 10  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0194 LB/MMBTU 3-HR AVG  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) GCP and good burner design  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Compliance demonstrated by stack testing

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Other  
**Other Test Method:** Method 18 or 25A  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.0014 LB/MMBTU 3-HR AVG  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GCP and good burner design  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Compliance demonstrated by stack testing

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM  
**Test Method:** EPA/OAR Mthd 201A and 202  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0024 LB/MMBTU 3-HR AVG  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GCP and good burner design  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Compliance demonstrated by stack testing

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM  
**Test Method:** Other  
**Other Test Method:** 201A and 202  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0024 LB/MMBTU 3-HR AVG  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) GCP and good burner design

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Compliance demonstrated by stack testing

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 604.0000 TONS/YEAR 12-MONTH ROLLING AVG  
**Emission Limit 2:** 604.0000 TONS/BI-MONTH PERIOD DURING COMMISSIONING/SHAKEDOWN PERIOD  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Energy efficient design, GCP, and use of automated combustion management system with inlet air controls

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Ammonia Storage Flare  
**Process Type:** 19.310 (Chemical Plant Flares)  
**Primary Fuel:** Natural Gas  
**Throughput:** 0.40 mmBtu/hr  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 LB/MMBTU PILOT  
**Emission Limit 2:** 0.0680 LB/MMBTU DURING BOIL-OFF EVENT

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist flare design, Work Practices in accordance with 40 CFR 60.18(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Also 13.7 tons/year from boil-off events and 15.68 tons/year (pilot and boil-off)

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0800 LB/MMBTU PILOT

**Emission Limit 2:** 0.3100 LB/MMBTU DURING BOIL-OFF EVENT

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist flare design, Work Practices in accordance with 40 CFR 60.18(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Also 8.36 tons/year (pilot and boil-off)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.0054 LB/MMBTU PILOT

**Emission Limit 2:** 0.1500 TONS/YEAR PILOT AND BOIL-OFF

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist flare design, Work Practices in accordance with 40 CFR 60.18(b), GCP, use of nitrogen as purge gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0100 TONS/YEAR PILOT AND BOIL-OFF  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist, smokeless flare design, Work Practices in accordance with 40 CFR 60.18(b), GCP, use of nitrogen as purge gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0100 TONS/YEAR PILOT AND BOIL-OFF  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist, smokeless flare design, Work Practices in accordance with 40 CFR 60.18(b), GCP, use of nitrogen as purge gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 3305.0000 TONS/YEAR PILOT AND BOIL-OFF  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flare Minimization Plan and Root Cause Analysis, Steam-assist flare design, Work Practices in accordance with 40 CFR 60.18(b), GCP, use of nitrogen as purge gas

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

### Process/Pollutant Information

**PROCESS NAME:** Cooling Tower  
**Process Type:** 99.009 (Industrial Process Cooling Towers)  
**Primary Fuel:**  
**Throughput:** 145310.00 gallons/minute  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 PERCENT DRIFT RATE  
**Emission Limit 2:** 2000.0000 PPM TDS, MONTHLY AVG  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) High efficiency drift eliminators  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Monthly sampling to determine TDS content of water circulated in the cooling tower

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0005 PERCENT DRIFT RATE  
**Emission Limit 2:** 2000.0000 PPM TDS, MONTHLY AVG  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) High efficiency drift eliminators  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Monthly sampling to determine TDS content of water circulating in cooling tower

Process/Pollutant Information
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**PROCESS NAME:** Piping Components  
**Process Type:** 62.999 (Other Inorganic Chemical Manufacturing Sources)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Use of "leakless" valves and pumps if available otherwise high-quality components, non-instrumental and instrumental-based LDAR program meeting criteria of VVa  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Methane  
**CAS Number:** 74-82-8  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) , Organic Compounds (all) , Organic Non-HAP Compounds )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Use of "leakless" valves and pumps if available otherwise high-quality components, non-instrumental and instrumental-based LDAR program meeting criteria of VVa  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

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**PROCESS NAME:** Roadways  
**Process Type:** 99.140 (Paved Roads)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 µ (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 10.0000 PERCENT OPACITY FROM ROADWAYS  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Paving of all roadways and Fugitive Dust Control Plan, including mitigative measures (sweeping, water sprays, prompt cleanups)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 µ (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 10.0000 PERCENT OPACITY FROM ROADWAYS  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Paving of all roadways and Fugitive Dust Control Plan, including mitigative measures (sweeping, water sprays, prompt cleanups)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Emergency Generator Engine  
**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** Diesel Fuel  
**Throughput:** 3985.00 hp  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 6.4000 G/KW-HR 3-HR AVG  
**Emission Limit 2:** 75.0000 HR/YR OPERATIONAL LIMIT  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Limit 1 includes non-methane hydrocarbons (NMHC), i.e., NOx + NMHC, consistent with the NSPS, 40 CFR 60 Subpart III

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 6.4000 G/KW-HR 3-HR AVG  
**Emission Limit 2:** 75.0000 HR/YR OPERATIONAL LIMIT  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Limit 1 includes non-methane hydrocarbons (NMHC), i.e., NOx + NMHC, consistent with the NSPS, 40 CFR 60 Subpart III

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 3.5000 G/KW-HR 3-HR AVG

**Emission Limit 2:** 75.0000 HR/YR OPERATIONAL LIMIT

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Limit 1 is consistent with NSPS, 40 CFR 60 Subpart III

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2000 G/KW-HR 3-HR AVG

**Emission Limit 2:** 75.0000 HR/YR OPERATIONAL LIMIT

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Limit 1 is consistent with NSPS, 40 CFR 60 Subpart IIII. NSPS PM limit serves as BACT for PM10/PM2.5 for this engine

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2000 G/KW-HR 3-HR AVG

**Emission Limit 2:** 75.0000 HR/YR OPERATIONAL LIMIT

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Limit 1 is consistent with NSPS, 40 CFR 60 Subpart IIII. NSPS PM limit serves as BACT for PM10/PM2.5 for this engine

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 160.0000 TONS/YEAR

**Emission Limit 2:** 75.0000 HR/YR OPERATIONAL LIMIT

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Operate and maintain engine in accordance with NSPS IIII

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Firewater Pump Engine  
**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** Diesel Fuel  
**Throughput:** 369.00 hp  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 4.0000 G/KW-HR 3-HR AVG  
**Emission Limit 2:** 100.0000 HR/YR OPERATIONAL LIMIT  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Limit 1 includes NMHC, i.e., NOx + NMHC, consistent with the NSPS, 40 CFR 60 Subpart IIII

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 4.0000 G/KW-HR 3-HR AVG  
**Emission Limit 2:** 100.0000 HR/YR OPERATIONAL LIMIT  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Limit 1 includes NMHC, i.e., NO<sub>x</sub> + NMHC, consistent with the NSPS, 40 CFR 60 Subpart IIII

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 3.5000 G/KW-HR 3-HR AVG

**Emission Limit 2:** 100.0000 HR/YR OPERATIONAL LIMIT

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Limit 1 is consistent with NSPS IIII

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2000 G/KW-HR 3-HR AVG

**Emission Limit 2:** 100.0000 HR/YR OPERATIONAL LIMIT

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (N)  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Limit 1 is consistent with NSPS III. NSPS PM limit serves as BACT for PM10/PM2.5

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.2000 G/KW-HR 3-HR AVG  
**Emission Limit 2:** 100.0000 HR/YR OPERATIONAL LIMIT  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (N)  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Limit 1 is consistent with NSPS III. NSPS PM limit serves as BACT for PM10/PM2.5

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 25.0000 TONS/YEAR  
**Emission Limit 2:** 100.0000 HR/YR OPERATIONAL LIMIT  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (N)  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Operate and maintain the engine in accordance with NSPS IIII

Process/Pollutant Information

**PROCESS NAME:** Process Water Deaerator  
**Process Type:** 62.999 (Other Inorganic Chemical Manufacturing Sources)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.3100 TONS/YEAR  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (N)  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Storage Tanks  
**Process Type:** 42.009 (Volatile Organic Liquid Storage)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** Two diesel storage tanks and one CO2 absorption solvent (MDEA) storage tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.0100 TONS/YEAR COMBINED  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Submerged fill pipes  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

## Facility Information

<b>RBLC ID:</b>	LA-0396 (final)	<b>Date Determination</b>
		<b>Last Updated:</b> 02/27/2025
<b>Corporate/Company Name:</b>	MARATHON PETROLEUM CO LP	<b>Permit Number:</b> PSD-LA-822(M-4)
<b>Facility Name:</b>	MARATHON GARYVILLE REFINERY	<b>Permit Date:</b> 12/04/2023 (actual)
<b>Facility Contact:</b>	MICHAEL HENSCHEN 9855357110 MAHENSCHEN@MARATHONPETROLEUM.COM	<b>FRS Number:</b> 110041135580
<b>Facility Description:</b>	The Garyville Refinery is a fully integrated petroleum refinery. The refinery processes both foreign and domestic crude oils into a variety of products including, but not limited to, liquefied petroleum gas, motor and heating fuels, asphalt, elemental sulfur, and petroleum coke. Crude oil arrives at the refinery by barge, ship, and/or pipeline.	<b>SIC Code:</b> 2911
<b>Permit Type:</b>	C: Modify process at existing facility	<b>NAICS Code:</b> 324110
<b>Permit URL:</b>	<a href="https://edms.deq.louisiana.gov/app/doc/view?doc=14082961">https://edms.deq.louisiana.gov/app/doc/view?doc=14082961</a>	<b>COUNTRY:</b> USA
<b>EPA Region:</b>	6	
<b>Facility County:</b>	ST. JOHN THE BAPTIST	
<b>Facility State:</b>	LA	
<b>Facility ZIP Code:</b>	70051	
<b>Permit Issued By:</b>	LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name) MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV	
<b>Other Agency Contact Info:</b>	Permit Writer: Mr. Dan Nguyen, (225)219-3180	

**Permit Notes:** Complete Application Date reflects date of administrative completeness. Permit PSD-LA-822(M3) was issued February 11, 2021, for the Unit 210 Revamp Project. The project is under construction. Vacuum Tower Heaters 210-1403 and 210-1404 (EQT0293) are affected sources of the project. However, at that time, the project did not include modification of the heaters. Therefore, Best Available Control Technology (BACT) analyses were not performed for emissions from the heaters. Now, Marathon proposes to upgrade the air pre-heat (physical modification) to the heaters to allow for greater operational efficiency.

Process/Pollutant Information
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**PROCESS NAME:** Vacuum Tower Heaters 210-1403 and 210-1404  
**Process Type:** 11.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)  
**Primary Fuel:** RFG/NG  
**Throughput:** 338.77 mm BTU/h

**Process Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 µ (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0100 LB/MM BTU ANNUAL AVERAGE  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NESHAP , OPERATING PERMIT

**Control Method:** (P) Compliance with the applicable work practice standards of 40 CFR 63 Subpart DDDDD, proper design and good engineering practices, and use of refinery fuel gas and/or natural gas as fuel.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 µ (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0100 LB/MM BTU ANNUAL AVERAGE  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NESHAP , OPERATING PERMIT  
**Control Method:** (P) Compliance with the applicable work practice standards of 40 CFR 63 Subpart DDDDD, proper design and good engineering practices, and use of refinery fuel gas and/or natural gas as fuel.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0200 LB/MM BTU ANNUAL AVERAGE  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** OPERATING PERMIT , NESHAP  
**Control Method:** (P) Compliance with the applicable work practice standards of 40 CFR 63 Subpart DDDDD, proper design and good engineering practices, and use of refinery fuel gas and/or natural gas as fuel.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.0015 LB/MM BTU ANNUAL AVERAGE  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NESHAP , OPERATING PERMIT  
**Control Method:** (P) Compliance with the applicable work practice standards of 40 CFR 63 Subpart DDDDD, proper design and good engineering practices, and use of refinery fuel gas and/or natural gas as fuel.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0125 LB/MM BTU ANNUAL AVERAGE  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NESHAP , OPERATING PERMIT  
**Control Method:** (A) ULNB + SCR  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:** 40.0000 PPM ANNUAL AVERAGE  
**Emission Limit 2:** 25.0000 PPM ANNUAL AVERAGE  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NESHAP , OPERATING PERMIT  
**Control Method:** (P) Limiting sulfur and hydrogen sulfide in fuel gas.

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** Emission limit 1 is maximum total sulfur concentration in the fuel gas. Emission limit 2 is the maximum hydrogen sulfide concentration in the fuel gas. Limits are based on monthly fuel gas sampling for sulfur plus CEMS weekly H2S average.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NESHAP , OPERATING PERMIT  
**Control Method:** (P) Use of clean fuels and compliance with work practice standards of 40 CFR 63 Subpart DDDDD.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** There was no emission limit for GHG in the PSD permit.

Process/Pollutant Information
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**PROCESS** HF Alkylation Main Frac Reboiler Heaters

**NAME:**

**Process Type:** 11.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

**Primary Fuel:** RFG/NG

**Throughput:** 452.50 mm BTU/h

**Process Notes:** BACT for NOx is being updated to reflect determination for forced draft units. The BACT determination previously reflected a determination for natural draft units.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0600 LB/MM BTU ANNUAL AVERAGE  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NESHAP , OPERATING PERMIT  
**Control Method:** (A) Low NOx Burners  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:** BACT for NOx is being updated to reflect a determination for forced draft units. The BACT determination previously reflected a determination for natural draft units.

## Facility Information

<b>RBLC ID:</b>	TX-0964 (final)	<b>Date</b>
		<b>Determination</b>
<b>Corporate/Company Name:</b>	LINDE, INC	<b>Last Updated:</b> 04/08/2025
		<b>Permit Number:</b> 172324, PSDTX1620, GHGPSDTX231
<b>Facility Name:</b>	NEDERLAND FACILITY	<b>Permit Date:</b> 10/05/2023 (actual)
<b>Facility Contact:</b>	TODD SALEMO 281-203-3769	<b>FRS Number:</b> NOT FOUND
<b>Facility Description:</b>	Material balance assuming all waste gas sulfur is oxidized to SO2. 1.21 mole % H2S in acid gas and 0.24 mole % H2S in Low BTU HC gas; concentration can vary depending on volume of gas flared. All routed to flare. Based on actual flaring event records that included a review by the applicant of 12-month rolling emission totals for 2019 through 2022 and emission inventory reports for 2011 through 2020 and limits on the gas sulfur content. Extensive monitoring required.	<b>SIC Code:</b> 2813
<b>Permit Type:</b>	A: New/Greenfield Facility	<b>NAICS Code:</b> 325120
<b>Permit URL:</b>		
<b>EPA Region:</b>	6	<b>COUNTRY:</b> USA
<b>Facility County:</b>	JEFFERSON	
<b>Facility State:</b>	TX	
<b>Facility ZIP Code:</b>		
<b>Permit Issued By:</b>	TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name) MS. ANNE INMAN(Agency Contact) (512) 239-1267 anne.inman@tceq.texas.gov	
<b>Other Agency Contact Info:</b>	Mr. Harry Xue, P.E., (512) 239-0541, Harry.Xue@tceq.texas.gov	
<b>Permit Notes:</b>		
<b>Affected Boundaries:</b>	<b>Boundary Type:</b> <b>Class 1 Area State:</b> <b>Boundary:</b> <b>Distance:</b>	

Process/Pollutant Information
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**PROCESS NAME:** AUXILLARY BOILER  
**Process Type:** 11.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)  
**Primary Fuel:** Hydrogen-rich plant fuel and natural  
**Throughput:** 0  
**Process Notes:** (limited to 600 hours per year)

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0150 LB/MMBTU HOURLY  
**Emission Limit 2:** 0.0100 LB/MMBTU ANNUAL AVERAGE  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (A) SCR  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 50.0000 PPMVD 3% O2 ANNUAL  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and fire hydrogen-rich plant fuel gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable (FPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and fire hydrogen-rich plant fuel gas, 5% OPACITY  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and fire hydrogen-rich plant fuel gas, 5% OPACITY  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 µ (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and fire hydrogen-rich plant fuel gas, 5% OPACITY

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and fire hydrogen-rich plant fuel gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

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Process/Pollutant Information
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**PROCESS NAME:** HEATERS  
**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** NATURAL GAS  
**Throughput:** 0  
**Process Notes:** ASU REGENERATION HEATERS & ASU VAPORIZER HEATERS

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 9.0000 PPMVD  
**Emission Limit 2:** 0.0120 LB/MMBTU  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS  
**Control Method:** (P) LOW NOX BURNERS  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 50.0000 PPMVD 3% O2  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS  
**Control Method:** (P) Good combustion practices and fire hydrogen-rich plant fuel gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable (FPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices and fire hydrogen-rich plant fuel gas, 5% OPACITY  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices and fire hydrogen-rich plant fuel gas, 5% OPACITY  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices and fire hydrogen-rich plant fuel gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** COOLING TOWERS  
**Process Type:** 99.009 (Industrial Process Cooling Towers)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, filterable (FPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 2000.0000 PPMW TDS  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Drift eliminators with 0.001% drift

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 µ (FPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 2000.0000 PPMW TDS  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Drift eliminators with 0.001% drift  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** EQUIPMENT FUGITIVES  
**Process Type:** 50.999 (Other Petroleum/Natural Gas Production & Refining Sources (except 42 - Liquid Marketing))  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good management practice and personal portable CO monitors for leaking detection

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good management practice and personal portable CO monitors for leaking detection

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** natural gas

**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) 40 CFR 60.18 and good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) 40 CFR 60.18 and good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and fire low carbon natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** CO2 Process Vents

**Process Type:** 99.999 (Other Miscellaneous Sources)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:** CO2 separated from the syngas stream as a by-product during hydrogen production

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good management practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Vented to off-site Carbon Capture and Sequestration (CCS) allowing up to 120 days downtime per year. Tier III BACT indicates a cost of \$113.13 per ton to construct a backup CCS to cover the 120 days/year downtime and determined to be economically infeasible.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Condensate Blowdown Vents  
**Process Type:** 99.999 (Other Miscellaneous Sources)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** Process condensate blowdown vapors during Hydrogen Plant MSS events

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 393.0000 PPMV  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Limit the MSS event duration and occurrence  
**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Limit the MSS event duration and occurrence  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

## Facility Information

<b>RBLC ID:</b>	LA-0398 (final)	<b>Date Determination</b>
<b>Corporate/Company Name:</b>	CAMERON LNG, LLC	<b>Last Updated:</b> 02/27/2025
<b>Facility Name:</b>	CAMERON LNG FACILITY	<b>Permit Number:</b> PSD-LA-766(M4)
<b>Facility Contact:</b>	MICHAEL MOPPERT 3376029426 MMOPPERT@CAMERONLNG.COM	<b>Permit Date:</b> 09/19/2023 (actual)
<b>Facility Description:</b>	An LNG Terminal consists of gasification and liquefaction operations.	<b>FRS Number:</b> 110001267058
<b>Permit Type:</b>	D: Both B (Add new process to existing facility) & C (Modify process at existing facility)	<b>SIC Code:</b> 1321
<b>Permit URL:</b>		<b>NAICS Code:</b> 211112
<b>EPA Region:</b>	6	<b>COUNTRY:</b> USA
<b>Facility County:</b>	CAMERON PARISH	
<b>Facility State:</b>	LA	
<b>Facility ZIP Code:</b>	70645	



**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0370 LB/MM BTU ANNUAL  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Proper burner design and operations Good combustion practices Compliance with 40 CFR 63 Subpart DDDDD

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.0054 LB/MM BTU ANNUAL

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Proper burner design and operations Good combustion practices Compliance with 40 CFR 63 Subpart DDDDD

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MM BTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Proper burner design and operations Good combustion practices Compliance with 40 CFR 63 Subpart DDDDD Fueled by natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 μ (FPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MM BTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Proper burner design and operations Good combustion practices Compliance with 40 CFR 63 Subpart DDDDD Fueled by natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of low carbon fuels Good combustion/operation/maintenance practices Efficient design

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Train 4 Thermal Oxidizer (EQT0114)

**Process Type:** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))

**Primary Fuel:** natural gas

**Throughput:** 83.80 mm btu/hr

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Low-NOx burners Minimize gas to the thermal oxidizer Good equipment design Use of appropriate Instrumentation Good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Minimize gas to the thermal oxidizer Good equipment design Use of appropriate Instrumentation Good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Minimize gas to the thermal oxidizer Good equipment design Use of appropriate Instrumentation Good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5  $\mu$  (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Minimize gas to the thermal oxidizer Good equipment design Use of appropriate Instrumentation Good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Minimize gas to the thermal oxidizer Good equipment design Use of appropriate Instrumentation Good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of low carbon fuels Good combustion/operation/maintenance practices Efficient design

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

## Facility Information

<b>RBLC ID:</b>	WI-0326 (draft)	<b>Date Determination</b>	
<b>Corporate/Company Name:</b>	NEMADJI TRAIL ENERGY CENTER	<b>Last Updated:</b>	04/28/2025
<b>Facility Name:</b>	NEMADJI TRAIL ENERGY CENTER	<b>Permit Number:</b>	21-JAM-212
<b>Facility Contact:</b>	TODD SIMMONS 2183134403 TSIMMONS@MNPOWER.COM	<b>Permit Date:</b>	09/19/2023 (actual)
<b>Facility Description:</b>	power generation	<b>FRS Number:</b>	Not Found
<b>Permit Type:</b>	A: New/Greenfield Facility	<b>SIC Code:</b>	4911
<b>Permit URL:</b>	<a href="https://apps.dnr.wi.gov/warp_ext/AM_DownloadObject.aspx?id=1136964">https://apps.dnr.wi.gov/warp_ext/AM_DownloadObject.aspx?id=1136964</a>	<b>NAICS Code:</b>	221121
<b>EPA Region:</b>	5	<b>COUNTRY:</b>	USA
<b>Facility County:</b>	DOUGLAS COUNTY		
<b>Facility State:</b>	WI		
<b>Facility ZIP Code:</b>	54880		
<b>Permit Issued By:</b>	WISCONSIN DEPT OF NATURAL RESOURCES; AIR MGMT. PROGRAM (Agency Name) MS. KRISTIN HART(Agency Contact) (608)266-6876 kristin.hart@wisconsin.gov		
<b>Other Agency Contact Info:</b>	DNR Facility Supervisor, Randall.Matty@wisconsin.gov, 9204920126		
<b>Permit Notes:</b>	Permit has been revoked at request of applicant prior to start of construction of project.		
<b>Facility-wide Emissions:</b>	<b>Pollutant Name:</b>	<b>Facility-wide Emissions Increase:</b>	
	Carbon Monoxide	2003.0000 (Tons/Year)	
	Nitrogen Oxides (NOx)	269.0000 (Tons/Year)	
	Particulate Matter (PM)	167.0000 (Tons/Year)	
	Sulfur Oxides (SOx)	29.0000 (Tons/Year)	
	Volatile Organic Compounds (VOC)	250.0000 (Tons/Year)	

## Process/Pollutant Information

**PROCESS NAME:** Combustion Turbine; S01/P01/C01a (SCR)/C01b (oxidation catalyst)  
**Process Type:** 15.210 (Natural Gas (includes propane & liquified petroleum gas))  
**Primary Fuel:** natural gas-fired  
**Throughput:** 4671.00 MMBtu/hr  
**Process Notes:** 310 MW; MMBtu/hr higher heating value (HHV)

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 2.0000 PPM 24-HOUR ROLLING AVE., FIRING NATURAL GAS  
**Emission Limit 2:** 6.0000 PPM 24-HOUR ROLLING, FIRING DIESEL FUEL OIL  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (A) Except during start-up and shutdown, BACT has been determined to be: (a) A selective catalytic reduction (SCR) system shall be used to control emissions from P01 when P01 is in operation. (b) P01 shall be equipped with low-NOx burners. (c) Water injection shall be used when firing diesel fuel oil.

**Est. % Efficiency:** 85.000

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** The applicant proposed to equip the turbine with all control options, so a cost analysis was not necessary.

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 1.5000 PPM 168-HOUR ROLLING AVE, FIRING NATURAL GAS  
**Emission Limit 2:** 1.5000 PPM 168-HOUR ROLLING AVE, FIRING DIESEL FUEL  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Except during start-up and shutdown, BACT has been determined to be: (a) An oxidation catalyst shall be used to control emissions from P01 while P01 is in operation. (b) The permittee shall use good combustion control according to the manufacturer's recommendations.

**Est. % Efficiency:** 80.000

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** The applicant proposed to equip the turbine with all control options, so a cost analysis was not necessary.

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 36.3000 LB/HR FIRING NATURAL GAS AND WITH DUCT FIRING

**Emission Limit 2:** 21.8000 LB/HR FIRING NATURAL GAS WITHOUT DUCT FIRING

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Firing fuels with low ash content (e.g. natural gas) & good combustion control

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** PM emissions from P01 may not exceed 36.3 lb/hr when firing natural gas and with duct firing. PM emissions from P01 may not exceed 21.8 lb/hr when firing natural gas without duct firing. PM emissions from P01 may not exceed 54.5 lb/hr when firing diesel fuel oil and with duct firing. PM emissions from P01 may not exceed 39.4 lb/hr when firing diesel fuel oil and without duct firing.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 2.7000 PPM 168-HOUR ROLLING, NATURAL GAS W/ DUCT

**Emission Limit 2:** 0.6000 PPM 168-HOUR ROLLING, NATURAL GAS W/OUT DUCT

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Except during start-up and shutdown, BACT has been determined to be: (a) An oxidation catalyst shall be used to control emissions from P01 while P01 is in operation. (b) The permittee shall use good combustion control according to the manufacturer's recommendations.

**Est. % Efficiency:** 40.000

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** VOC emissions from P01 may not exceed 2.7 ppm at 15% O2 based on a 168-hour rolling average when firing natural gas and with duct firing. VOC emissions from P01 may not exceed 0.6 ppm at 15% O2 based on a 168-hour rolling average when firing natural gas and without duct firing. VOC emissions from P01 may not exceed 3.3 ppm at 15% O2 based on a 168-hour rolling average when firing diesel fuel oil and with duct firing. VOC emissions from P01 may not exceed 0.6 ppm at 15% O2 based on a 168-hour rolling average when firing diesel fuel oil and without duct firing.

**POLLUTANT NAME:** Hydrogen Sulfide

**CAS Number:** 7783-06-4

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 9.9000 LB/HR NATURAL GAS, WITH DUCT FIRING

**Emission Limit 2:** 7.8000 LB/HR NATURAL GAS, WITHOUT DUCT FIRING

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) BACT, including duct burner emissions, has been determined to be: (a) Only pipeline quality natural gas and diesel fuel oil may be combusted in P01. (b) The permittee shall use good combustion control according to the manufacturer's recommendations. (c) The sulfur content of the diesel fuel oil fired may not exceed 15 ppm.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** H2SO4 emissions from P01 may not exceed 9.9 lb/hr when firing natural gas, with duct firing. H2SO4 emissions from P01 may not exceed 7.8 lb/hr when firing natural gas, without duct firing. H2SO4 emissions from P01 may not exceed 9.3 lb/hr when firing diesel fuel oil, with duct firing. H2SO4 emissions from P01 may not exceed 7.0 lb/hr when firing diesel fuel oil, without duct firing.

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** Unspecified

**Pollutant Group(s):** ( Acid Gasses/Mist , Greenhouse Gasses (GHG) , InOrganic Compounds )

**Emission Limit 1:** 850.0000 LB CO2/MW-HR 12-MONTH ROLLING, FIRING NATURAL GAS

**Emission Limit 2:** 1180.0000 LB CO2/MW-HR 12-MONTH ROLLING, FIRING DIESEL FUEL OIL

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) (a) Efficient turbine design. (b) Only pipeline quality natural gas and diesel fuel oil may be combusted in P01. (c) An oxidation catalyst shall be used to control emissions from P01 while P01 is in operation. (d) The combustion turbine is to be equipped with oxygen monitors as part of a continuous emissions monitoring (CEM) system.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** The applicant proposed to equip the turbine with all control options, so a cost analysis was not necessary.

### Process/Pollutant Information

**PROCESS NAME:** Boiler; S02/B02

**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

**Primary Fuel:** natural gas

**Throughput:** 100.00 MMBtu/hr

**Process Notes:** Natural Gas-Fired Auxiliary Boiler with ultra-low NOx burners, FGR and oxidation catalyst.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0110 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) (a) B02 shall be equipped with ultra-low NOx burners and flue gas recirculation. (b) The permittee shall operate and maintain B02 according to the manufacturer's recommendations.

**Est. % Efficiency:** 50.000

**Cost Effectiveness:** 5895 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** (c) If B02 is equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of B02 within 120 days after start-up and within 60-months of each preceding tune-up. (d) If B02 is not equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of B02 within 120 days after start-up and within 13 months of each preceding tune-up.

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0037 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) (a) An oxidation catalyst shall be used to control emissions from B02 while B02 is in operation. (b) The permittee shall operate and maintain B02 according to the manufacturer's recommendations.

**Est. % Efficiency:** 90.000

**Cost Effectiveness:** 5125 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** (c) If B02 is equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of B02 within 120 days after start-up and within 60-months of each preceding tune-up. (d) If B02 is not equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of B02 within 120 days after start-up and within 13 months of each preceding tune-up.

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0100 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) (a) Only pipeline quality natural gas may be combusted in B02. (b) The permittee shall operate and maintain B02 according to the manufacturer's recommendations.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** PM emissions from B02 may not exceed 0.01 lb/MMBtu. PM10 emissions from B02 may not exceed 0.01 lb/MMBtu. PM2.5 emissions from B02 may not exceed 0.01 lb/MMBtu. If B02 is equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of B02 within 120 days after start-up and within 60-months of each preceding tune-up. If B02 is not equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of B02 within 120 days after start-up and within 13 months of each preceding tune-up.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.0027 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) (a) An oxidation catalyst shall be used to control emissions from B02 while B02 is in operation. (b) The permittee shall operate and maintain B02 according to the manufacturer's recommendations.

**Est. % Efficiency:** 50.000

**Cost Effectiveness:** 5125 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** If B02 is equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of B02 within 120 days after start up and within 60-months of each preceding tune-up. If B02 is not equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of B02 within 120 days after start-up and within 13 months of each preceding tune-up.

**POLLUTANT NAME:** Hydrogen Sulfide

**CAS Number:** 7783-06-4

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0100 LB/HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of low sulfur fuel & combustion controls (a) Only pipeline quality natural gas may be combusted in B02. (b) The permittee shall operate and maintain B02 according to the manufacturer's recommendations.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** (c) If B02 is equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of B02 within 120 days after start-up and within 60-months of each preceding tune-up. (d) If B02 is not equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of B02 within 120 days after start-up and within 13 months of each preceding tune-up.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 160.0000 LBS OF CO2E PER MMBTU USEFUL HEAT (STEAM) OUTPUT,

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) B02 shall be equipped with ultra-low NOx burners and flue gas recirculation. The permittee shall operate and maintain B02 according to the manufacturer's recommendations. Only pipeline quality natural gas may be combusted in B02.

**Est. % Efficiency:**

**Cost Effectiveness:** 5895 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** per MMBtu useful heat (steam) output, as determined by a 12-month rolling average. If B02 is equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of B02 within 120 days after start-up and within 60-months of each preceding tune-up. If B02 is not equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of B02 within 120 days after start-up and within 13 months of each preceding tune-up.

**PROCESS NAME:** Circuit Breakers; F03 - SF6 Containing Equipment  
**Process Type:** 99.006 (Electronics Manufacturing (except 99.011))  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** Three 345-kilovolt (kV) circuit breakers and Two 19-kV low-side generator circuit breakers

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 120.0000 SHORT TONS CO2E PER YEAR  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) (1)(a) Circuit breakers containing SF6 shall be pressurized and have a manufacturer guaranteed loss rate not to exceed 0.5%, by weight, per year; and (b) The permittee shall comply with the leak monitoring program

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Compliance demonstration for BACT has been determined to be: (1) The permittee shall follow manufacturer recommendations for maintenance and repair of the affected breakers, with recovery and recycling of SF6 removed during maintenance procedures. (2) The permittee shall install a low-pressure leak detection system with alarm on each SF6 circuit breaker. (3) The permittee shall create alarms based on the pressure readings in the breakers, so that leaks can be detected before 10% by weight SF6 is lost. (4) Upon a detectable pressure drop that is 10% of the original temperature compensated pressure, the permittee shall perform maintenance on the SF6 containing device to repair the leak as quickly as is feasible. Such repairs shall be attempted within 5 days of the detection of the leak. The repairs shall be completed or the SF6 shall be removed from the device no later than 20 days after initial detection of the leak.

### Process/Pollutant Information

**PROCESS NAME:** Heaters: S04/P04 and S05/P05  
**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** natural gas  
**Throughput:** 10.00 MMBtu/hr

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0490 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) (a) P04 and P05 shall be equipped with low-NOx burners. (b) Only pipeline quality natural gas may be combusted in P04 and P05. (c) The permittee shall operate and maintain P04 and P05 according to the manufacturer's recommendations. (d) The permittee shall tune within 120 days of the initial operation, and within 24-months of each preceding tune-up. (e) NOx emissions from P04 and P05 may not exceed 0.049 lb/MMBtu each.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0800 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) (a) The permittee shall operate and maintain according to the manufacturer's recommendations. (b) The permittee shall tune within 120 days of the initial operation, and within 24-months of each preceding tune-up. (c) CO emissions may not exceed 0.08 lb/MMBtu. (d) The permittee may only combust pipeline quality natural gas.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0100 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) (a) The permittee shall operate and maintain according to the manufacturer's recommendations. (b) The permittee shall tune within 120 days of the initial operation, and within 24-months of each preceding tune-up. (c) The permittee may only combust pipeline quality natural gas.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** Add-on particulate matter emission controls are not feasible on such a small gas-fired unit. (d) PM emissions may not exceed 0.01 lb/MMBtu. (e) PM10 emissions may not exceed 0.01 lb/MMBtu. (f) PM2.5 emissions may not exceed 0.01 lb/MMBtu.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.0050 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) (a) The permittee shall operate and maintain according to the manufacturer's recommendations. (b) The permittee shall tune within 120 days of the initial operation, and within 24-months of each preceding tune-up. (c) VOC emissions from may not exceed 0.005 lb/MMBtu. (d) The permittee may only combust pipeline quality natural gas.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Hydrogen Sulfide

**CAS Number:** 7783-06-4

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) (a) The permittee shall operate and maintain according to the manufacturer's recommendations. (b) The permittee shall tune within 120 days of the initial operation, and within 24-months of each preceding tune-up. (c) The permittee may only combust pipeline quality natural gas.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** There are no add-on control technologies for controlling H2SO4 emissions from a gas heater.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) (a) Equipped with low-NOx burners. (b) Only pipeline quality natural gas may be combusted. (c) The permittee shall operate and maintain according to the manufacturer's recommendations. (d) The permittee shall tune within 120 days of the initial operation of, and within 24-months of each preceding tune-up.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No  
**Pollutant/Compliance Notes:** The NOx BACT also controls N2O emissions for GHG purposes.

**POLLUTANT NAME:** Visible Emissions (VE)  
**CAS Number:** VE  
**Test Method:** Unspecified  
**Pollutant Group(s):**  
**Emission Limit 1:** 10.0000 % OPACITY DENSITY  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Low NOx burners and combustion control: (a) Only pipeline quality natural gas may be combusted. (b) The permittee shall operate and maintain according to the manufacturer's recommendations. (c) The permittee shall tune within 120 days of the initial operation, and within 24-months of each preceding tune-up. (d) This emissions unit may not cause or allow emissions of shade or density greater than 10% opacity.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** P04 and P05 shall be equipped with low NOx burners.

### Process/Pollutant Information

**PROCESS NAME:** Fire Pump; S06/P06 – Emergency Diesel Fire Pump  
**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** diesel  
**Throughput:** 282.00 HP  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 3.0000 G/HP-HR  
**Emission Limit 2:** 500.0000 HOURS 12 ROLLING CALENDAR MONTHS  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and combusting clean fuels: (a) P06 may not operate more than 500 hours per each 12 rolling calendar months. (b) P06 shall be operated and maintained according to the manufacturer's recommendations. (c) NOx emissions from P06 may not exceed 3.0 g/hp-hr.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 2.6000 G/HP-HR

**Emission Limit 2:** 500.0000 HOURS 12 ROLLING CALENDAR MONTHS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices: (a) P06 may not operate more than 500 hours per each 12 rolling calendar months. (b) P06 shall be operated and maintained according to the manufacturer's recommendations. (c) Carbon monoxide emission from P06 may not exceed 2.6 g/hp-hr.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/HP-HR

**Emission Limit 2:** 500.0000 HOURS 12 ROLLING CALENDAR MONTHS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and clean fuels: (a) P06 may not operate more than 500 hours per each 12 rolling calendar months. (b) The sulfur content of the diesel fuel oil fired may not exceed 15 ppm. (c) P06 shall be operated and maintained according to the manufacturer's recommendations.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** No add-on controls were identified. (d) PM emissions from P06 may not exceed 0.15 g/hp-hr. (e) PM10 emissions from P06 may not exceed 0.15 g/hp-hr. (f) PM2.5 emissions from P06 may not exceed 0.15 g/hp-hr.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 1.1000 G/HP-HR

**Emission Limit 2:** 500.0000 HOURS 12 ROLLING CALENDAR MONTHS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices: (a) P06 may not operate more than 500 hours per each 12 rolling calendar months. (b) P06 shall be operated and maintained according to the manufacturer's recommendations. (c) VOC emission from P06 may not exceed 1.1 g/hp-hr.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** Combustion control and combusting clean fuels are considered baseline for the emergency diesel fire pump.

**POLLUTANT NAME:** Hydrogen Sulfide

**CAS Number:** 7783-06-4

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 500.0000 HOURS 12 ROLLING CALENDAR MONTHS

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices: (a) P06 may not operate more than 500 hours per each 12 rolling calendar months. (b) P06 shall be operated and maintained according to the manufacturer's recommendations. (c) The sulfur content of the diesel fuel oil fired may not exceed 15 ppm.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** Good combustion practices and combusting low sulfur fuel (ultra-low sulfur diesel fuel or natural gas) are considered the baseline for this type of emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 500.0000 HOURS 12 ROLLING CALENDAR MONTHS

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Selection of the most efficient reciprocating internal combustion engine and minimizing the hours of operation limits greenhouse gas emissions. - EPA Tier 3 certified reciprocating internal combustion engine and - limiting its hours of operation to 500 hours per each 12 consecutive calendar months. - Part of ensuring efficient engine operation is properly maintaining the engine and the combustion of clean fuels. In this case, clean fuel is determined to be ultra-low sulfur diesel fuel (less than 15 ppm sulfur content).

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** These greenhouse gas controls are considered baseline.

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

**Test Method:** Unspecified

**Pollutant Group(s):**

**Emission Limit 1:** 500.0000 HOURS 12 ROLLING CALENDAR MONTHS  
**Emission Limit 2:** 10.0000 % OPACITY SHADE OR DENSITY  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and clean fuels: (a) P06 may not operate more than 500 hours per each 12 rolling calendar months. (b) The sulfur content of the diesel fuel oil fired may not exceed 15 ppm. (c) P06 shall be operated and maintained according to the manufacturer's recommendations. (d) This emissions unit may not cause or allow emissions of shade or density greater than 10% opacity.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Emergency Generator  
**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** diesel  
**Throughput:** 1490.00 HP  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 4.8000 G/HP-HR  
**Emission Limit 2:** 500.0000 HOURS PER EACH 12 ROLLING CALENDAR MONTHS  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices and combusting clean fuels  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 2.6000 G/HP-HR

**Emission Limit 2:** 500.0000 HOURS PER EACH 12 ROLLING CALENDAR MONTHS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices which include operational and design elements.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/HP-HR

**Emission Limit 2:** 500.0000 HOURS PER EACH 12 ROLLING CALENDAR MONTHS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and clean fuels. The sulfur content of the diesel fuel oil fired may not exceed 15 ppm.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** (d) PM emissions from P07 may not exceed 0.15 g/hp-hr. (e) PM10 emissions from P07 may not exceed 0.15 g/hp-hr. (f) PM2.5 emissions from P07 may not exceed 0.15 g/hp-hr.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.3200 G/HP-HR  
**Emission Limit 2:** 500.0000 HOURS PER YEAR FOR TESTING AND MAINTENANCE  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices include operational and design elements.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** No  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Hydrogen Sulfide  
**CAS Number:** 7783-06-4  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 500.0000 HOURS PER EACH 12 ROLLING CALENDAR MONTHS  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices and combusting low sulfur fuel. The sulfur content of the diesel fuel oil fired may not exceed 15 ppm.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** No  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 500.0000 HOURS PER EACH 12 ROLLING CALENDAR MONTHS  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Selection of the most efficient reciprocating internal combustion engine and minimizing the hours of operation limits greenhouse gas emissions. EPA Tier 2 certified reciprocating internal combustion engine and limiting its hours of operation to 500 hours per each 12 consecutive calendar months.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:** P07 shall be certified to at least meet EPA's criteria for Tier 2 reciprocating internal combustion engines

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

**Test Method:** Unspecified

**Pollutant Group(s):**

**Emission Limit 1:** 10.0000 % OPACITY

**Emission Limit 2:** 500.0000 HOURS PER EACH 12 ROLLING CALENDAR MONTHS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and clean fuels

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS** tanks; diesel fuel tanks  
**NAME:**  
**Process Type:** 42.005 (Petroleum Liquid Storage in Fixed Roof Tanks)  
**Primary Fuel:** diesel  
**Throughput:** 0  
**Process Notes:** T01 – 180,000-gallon diesel fuel day tank T02 – 1,700-gallon diesel fuel generator tank T03 – 350-gallon diesel fuel fire pump tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) (a) Use of fixed roof tanks; (b) Performing submerged-filling or bottom loading of each fixed roof storage tank; and (c) These storage tanks may only store diesel fuel.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** No  
**Pollutant/Compliance Notes:** Limits on the type of materials stored and fixed roof tanks are considered the baseline for above ground storage tanks.

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Haul Roads  
**Process Type:** 99.140 (Paved Roads)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) (a) All roads within the property boundary shall be paved; (b) The permittee shall post a 5 miles per hour speed limit for all vehicle traffic; and (c) The permittee shall develop, maintain, and implement a fugitive dust control plan no later than the date facility roads are in use after commencing construction.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

**Test Method:** Unspecified

**Pollutant Group(s):**

**Emission Limit 1:** 10.0000 % OPACITY ON A 6-MINUTE AVERAGE BASIS

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Visible emissions from F01 may not exceed 10% opacity on a 6-minute average basis. All roads within the property boundary shall be paved; The permittee shall post a 5 miles per hour speed limit for all vehicle traffic; and The permittee shall develop, maintain, and implement a fugitive dust control plan no later than the date facility roads are in use after commencing construction.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Piping; Natural gas and fuel oil piping components

**Process Type:** 50.007 (Petroleum Refining Equipment Leaks/Fugitive Emissions)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Facility Leak Detection and Repair (LDAR) Plan that will include either a portable gas analyzer that meets the requirements of 40 CFR 60, Appendix A, Method 21, Section 6, for identifying leaks or an optical gas imaging instrument as allowed under 40 CFR 60.18(g)

**Est. % Efficiency:** 97.000

**Cost Effectiveness:** 3258 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** No

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** Y

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Facility Leak Detection and Repair (LDAR) Plan that will include either a portable gas analyzer that meets the requirements of 40 CFR 60, Appendix A, Method 21, Section 6, for identifying leaks or an optical gas imaging instrument as allowed under 40 CFR 60.18(g)

**Est. % Efficiency:** 97.000

**Cost Effectiveness:** 3258 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: No

Pollutant/Compliance Notes:

## Facility Information

<b>RBLC ID:</b>	TX-0959 (final)	<b>Date</b>	
<b>Corporate/Company Name:</b>	ASHOKA STEEL MILLS LLC	<b>Determination</b>	
<b>Facility Name:</b>	STEEL MILL	<b>Last Updated:</b>	04/07/2025
<b>Facility Contact:</b>	ASHOK SUKAMARAN 860-990-8610	<b>Permit Number:</b>	169574, PSDTX1608
<b>Facility Description:</b>	an initial permit application to authorize a steel mill in Sulphur Springs, Hopkins County. The Steel Mill will be comprised of a Fumes Treatment Plant (FTP), Eddy Current Sensor (ECS), Scrapyard, Scrap Handling and drop points, Electric Arc Furnace, Ladle Furnace, Continuous Casting Machine, Water Treatment Plant, Induction Heater, Rolling Mill, and Finished Product Storage.	<b>Permit Date:</b>	06/28/2023 (actual)
<b>Permit Type:</b>	A: New/Greenfield Facility	<b>FRS Number:</b>	Not Found
<b>Permit URL:</b>		<b>SIC Code:</b>	3312
<b>EPA Region:</b>	6	<b>NAICS Code:</b>	331111
<b>Facility County:</b>	HOPKINS	<b>COUNTRY:</b>	USA
<b>Facility State:</b>	TX		
<b>Facility ZIP Code:</b>			
<b>Permit Issued By:</b>	TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name) MS. ANNE INMAN(Agency Contact) (512) 239-1267 anne.inman@tceq.texas.gov		
<b>Other Agency Contact Info:</b>	Mr. Alexander Au, (512) 239-1890, Alexander.Au@tceq.texas.gov		
<b>Permit Notes:</b>			
<b>Affected Boundaries:</b>	<b>Boundary Type:</b> CLASS1	<b>Class 1 Area State:</b> AR	<b>Boundary:</b> Caney Creek
			<b>Distance:</b> 100km - 50km

## Process/Pollutant Information

<b>PROCESS NAME:</b>	Electric Arc Furnace (EAF)
<b>Process Type:</b>	81.210 (Electric Arc Furnaces)
<b>Primary Fuel:</b>	electric
<b>Throughput:</b>	350000.00 TON/YR
<b>Process Notes:</b>	natural gas-fired burners are used to pre-heat the steel
<b>POLLUTANT NAME:</b>	Nitrogen Oxides (NOx)

**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.3000 LB/TON STEEL ROUTINE  
**Emission Limit 2:** 0.3900 LB/TON STEEL MSS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas. Additionally, a fume treatment plant (FTP) will be used to capture emissions, and a canopy hood will be used to collect emissions not captured by the FTP system.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.3000 LB/TON STEEL ROUTINE

**Emission Limit 2:** 0.3900 LB/TON STEEL MSS

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas. A scrap management program will be implemented to reduce VOC emissions from melted scrap. Additionally, a fume treatment plant (FTP) will be used to capture emissions, and a canopy hood will be used to collect emissions not captured by the FTP system.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 4.0000 LB/TON STEEL ROUTINE  
**Emission Limit 2:** 4.5000 LB/TON STEEL MSS  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas. Additionally, a fume treatment plant (FTP) will be used to capture emissions, and a canopy hood will be used to collect emissions not captured by the FTP system.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:** 0.6000 LB/TON STEEL ROUTINE  
**Emission Limit 2:** 0.6500 LB/TON STEEL MSS  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas. Additionally, a fume treatment plant (FTP) will be used to capture emissions, and a canopy hood will be used to collect emissions not captured by the FTP system.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable (FPM)  
**CAS Number:** PM

**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0024 GR/DSCF  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (A) Baghouse with 0.0024 grains/dscf outlet grain loading. Additionally, a fume treatment plant (FTP) will be used to capture emissions, and a canopy hood will be used to collect emissions not captured by the FTP system.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10  $\mu$  (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0024 GR/DSCF

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (A) Baghouse with 0.0024 grains/dscf outlet grain loading. Additionally, a fume treatment plant (FTP) will be used to capture emissions, and a canopy hood will be used to collect emissions not captured by the FTP system.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5  $\mu$  (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0024 GR/DSCF

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (A) Baghouse with 0.0024 grains/dscf outlet grain loading. Additionally, a fume treatment plant (FTP) will be used to capture emissions, and a canopy hood will be used to collect emissions not captured by the FTP system.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Lead (Pb) / Lead Compounds

**CAS Number:** 7439-92-1

**Test Method:** Unspecified

**Pollutant Group(s):** ( Hazardous Air Pollutants (HAP) , Heavy Metals , InOrganic Compounds , Particulate Matter (PM) )

**Emission Limit 1:** 0.0001 LB/TON STEEL

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (A) Baghouse with 0.0024 grains/dscf outlet grain loading. Scrap management will be used to limit lead content in the used scrap with a conservative maximum estimate of 0.1% lead. Additionally, a fume treatment plant (FTP) will be used to capture emissions, and a canopy hood will be used to collect emissions not captured by the FTP system.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Fluorides, Total

**CAS Number:** 16984-48-8

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0590 LB/TON STEEL  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (A) Baghouse with 0.0024 grains/dscf outlet grain loading. Additionally, a fume treatment plant (FTP) will be used to capture emissions, and a canopy hood will be used to collect emissions not captured by the FTP system.

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Casting  
**Process Type:** 81.230 (Casting & Pouring Processes)  
**Primary Fuel:** NATURAL GAS  
**Throughput:** 0  
**Process Notes:** includes MSS

**POLLUTANT NAME:** Particulate matter, filterable (FPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0052 GR/DSCF  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (A) BAGHOUSE  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10  $\mu$  (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0052 GR/DSCF

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (A) BAGHOUSE

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5  $\mu$  (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0052 GR/DSCF

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (A) BAGHOUSE

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Tundish Dryer and Preheater  
**Process Type:** 81.230 (Casting & Pouring Processes)  
**Primary Fuel:** NATURAL GAS  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.0019 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0840 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:** 0.0006 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 µ (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 µ (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0019 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Ladle Dryer and Preheater  
**Process Type:** 81.230 (Casting & Pouring Processes)  
**Primary Fuel:** NATURAL GAS  
**Throughput:** 0  
**Process Notes:** MSS

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.0019 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

**CAS Number:** 7446-09-5

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )

**Emission Limit 1:** 0.0840 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0019 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) clean scrap and fuel  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10  $\mu$  (FPM10)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0019 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5  $\mu$  (FPM2.5)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0019 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0840 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**Process/Pollutant Information**

**PROCESS NAME:** Service Cutting Torches

**Process Type:** 81.230 (Casting & Pouring Processes)

**Primary Fuel:** NATURAL GAS

**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.0019 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0840 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO<sub>2</sub>)

**CAS Number:** 7446-09-5

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SO<sub>x</sub>) )

**Emission Limit 1:** 0.0006 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 µ (FPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0019 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 µ (FPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0019 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (P) Good combustion practices and use of pipeline quality natural gas  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Rolling Mill  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, fugitive

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):**

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (A) Water Spray/Moisture Control

**Est. % Efficiency:** 70.000

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (A) Water Spray/Moisture Control  
**Est. % Efficiency:** 70.000  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (A) Water Spray/Moisture Control  
**Est. % Efficiency:** 70.000  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Slag Stockpile  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, fugitive

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):**  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (A) Water Spray/Moisture Control  
**Est. % Efficiency:** 70.000  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (A) Water Spray/Moisture Control  
**Est. % Efficiency:** 70.000  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (A) Water Spray/Moisture Control

**Est. % Efficiency:** 70.000

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Scrap Handling/Loading

**Process Type:** 81.290 (Other Steel Manufacturing Processes)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Particulate matter, fugitive

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):**

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** NSPS , MACT

**Control Method:** (A) Water Spray/Moisture Control

**Est. % Efficiency:** 70.000

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (A) Water Spray/Moisture Control  
**Est. % Efficiency:** 70.000  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (A) Water Spray/Moisture Control  
**Est. % Efficiency:** 70.000  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**



**Emission Limit 2:** 0.0075 LB/MMBTU ANNUAL

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER

**Other Applicable Requirements:** NSPS , MACT , SIP

**Control Method:** (B) Ultra Low NOX burners with SCR, process fuel gas with fluctuating fuel gas characteristics and firing rates

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER

**Other Applicable Requirements:** NSPS , MACT , SIP

**Control Method:** (P) Good design & combustion practices with process fuel gas with fluctuating fuel gas characteristics and firing rates.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 100.0000 PPMVD 3% )2

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , MACT , SIP  
**Control Method:** (P) Good design & combustion practices with process fuel gas with fluctuating fuel gas characteristics and firing rates.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good design & combustion practices with process fuel gas with fluctuating fuel gas characteristics and firing rates.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable (FPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good design & combustion practices with process fuel gas with fluctuating fuel gas characteristics and firing rates.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 µ (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good design & combustion practices with process fuel gas with fluctuating fuel gas characteristics and firing rates.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 µ (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good design & combustion practices with process fuel gas with fluctuating fuel gas characteristics and firing rates.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** wet surface air coolers  
**Process Type:** 64.999 (Other SOCOMI Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Drift less than or equal to 0.001%.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 µ (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**

**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Drift less than or equal to 0.001%.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Drift less than or equal to 0.001%.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** cooling tower  
**Process Type:** 64.999 (Other SO2MI Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Drift less than or equal to 0.001%.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Drift less than or equal to 0.001%.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Drift less than or equal to 0.001%.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** FUGITIVES  
**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** EPA/OAR Mthd 21  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** NSPS , MACT , SIP  
**Control Method:** (P) VOC fugitives will be controlled via 28LAER; In addition, EP will utilize leak free pumps and compressors  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide  
**CAS Number:** 124-38-9  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Acid Gasses/Mist , Greenhouse Gasses (GHG) , InOrganic Compounds )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) VOC fugitives will be controlled via 28LAER; In addition, EP will utilize leak free pumps and compressors  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** STORAGE TANKS  
**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** FIXED ROOF WITH VP < 0.002 PSIA

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO<sub>2</sub>e)  
**CAS Number:** CO<sub>2</sub>e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** NSPS , NESHAP , MACT , SIP

**Control Method:** (P) submerged fill and have white or aluminum exterior surfaces  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** NSPS , NESHAP , MACT , SIP  
**Control Method:** (P) submerged fill and have white or aluminum exterior surfaces  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** TRUCK LOADING  
**Process Type:** 64.005 (Transfer of SOCFI Chemicals (loading/unloading, filling, etc.))  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Flexible hoses with dry-disconnect fittings will be used.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER

**Other Applicable Requirements:** SIP

**Control Method:** (P) Flexible hoses with dry-disconnect fittings will be used.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**Process/Pollutant Information**

**PROCESS NAME:** PROCESS VENTS

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:**

**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (A) Flare  
**Est. % Efficiency:** 98.000  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** NSPS , NESHAP , MACT , SIP  
**Control Method:** (A) FLARE  
**Est. % Efficiency:** 98.000  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** FLARE  
**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** NATURAL GAS PILOT

**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NO<sub>x</sub>)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NO<sub>x</sub>) , Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:**  
**Control Method:** (P) Good design & combustion practices,  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** NSPS , NESHAP , MACT , SIP  
**Control Method:** (P) Good design & combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good design & combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good design & combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good design & combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good design & combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good design & combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** EQUIPMENT CLEANING MSS

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:**

**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER

**Other Applicable Requirements:** NSPS , NESHAP , MACT , SIP

**Control Method:** (B) Knockout drum to separate liquids and vapors, liquids returned to process, vapors to flare, remaining liquids drained to pan, pumped to vacuum truck; VOC-containing vessels degassed to flare until less than 10,000 ppmv

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** NSPS , NESHAP , MACT , SIP  
**Control Method:** (B) Knockout drum to separate liquids and vapors, liquids returned to process, vapors to flare, remaining liquids drained to pan, pumped to vacuum truck; VOC-containing vessels degassed to flare until less than 10,000 ppmv  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** NSPS , NESHAP , MACT , SIP  
**Control Method:** (B) Knockout drum to separate liquids and vapors, liquids returned to process, vapors to flare, remaining liquids drained to pan, pumped to vacuum truck; VOC-containing vessels degassed to flare until less than 10,000 ppmv  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** NSPS , NESHAP , MACT , SIP  
**Control Method:** (B) Knockout drum to separate liquids and vapors, liquids returned to process, vapors to flare, remaining liquids drained to pan, pumped to vacuum truck; VOC-containing vessels degassed to flare until less than 10,000 ppmv  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** NSPS , NESHAP , MACT , SIP  
**Control Method:** (B) Knockout drum to separate liquids and vapors, liquids returned to process, vapors to flare, remaining liquids drained to pan, pumped to vacuum truck; VOC-containing vessels degassed to flare until less than 10,000 ppmv  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e

**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Knockout drum to separate liquids and vapors, liquids returned to process, vapors to flare, remaining liquids drained to pan, pumped to vacuum truck; VOC-containing vessels degassed to flare until less than 10,000 ppmv VOC  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

## Facility Information

<b>RBLC ID:</b>	AR-0180 (final)	<b>Date Determination</b>
		<b>Last Updated:</b> 02/26/2025
<b>Corporate/Company Name:</b>	HYBAR LLC	<b>Permit Number:</b> 2470-AOP-R0
<b>Facility Name:</b>	HYBAR LLC	<b>Permit Date:</b> 04/28/2023 (actual)
<b>Facility Contact:</b>	DAVID STICKLER 216-577-0645	<b>FRS Number:</b> Not Found
<b>Facility Description:</b>	Rebar Mill capable of producing 600,000 tons/year of straight bars or coiled steel rods.	<b>SIC Code:</b> 3312
<b>Permit Type:</b>	A: New/Greenfield Facility	<b>NAICS Code:</b> 331111
<b>Permit URL:</b>	<a href="https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/2470-AOP-R0.pdf">https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/2470-AOP-R0.pdf</a>	<b>COUNTRY:</b> USA
<b>EPA Region:</b>	6	
<b>Facility County:</b>	MISSISSIPPI	
<b>Facility State:</b>	AR	
<b>Facility ZIP Code:</b>	72370	
<b>Permit Issued By:</b>	ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name) MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us	
<b>Permit Notes:</b>		
<b>Facility-wide Emissions:</b>	<b>Pollutant Name:</b>	<b>Facility-wide Emissions Increase:</b>
	Carbon Monoxide	638.0000 (Tons/Year)
	Nitrogen Oxides (NOx)	147.7000 (Tons/Year)
	Particulate Matter (PM)	41.2000 (Tons/Year)
	Sulfur Oxides (SOx)	61.5000 (Tons/Year)

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Electric Arc Furnace #1 and Ladle Furnace #1  
**Process Type:** 81.210 (Electric Arc Furnaces)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

**CAS Number:** PM

**Test Method:** EPA/OAR Mthd 5D

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0018 GR/DSCF

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (A) Fabric Filter

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0024 GR/DSCF

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (A) Fabric Filter  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** EPA/OAR OTM 27 and Mthd 202  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0024 GR/DSCF  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (A) Fabric Filter  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO<sub>2</sub>)  
**CAS Number:** 7446-09-5  
**Test Method:** EPA/OAR Mthd 6C  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SO<sub>x</sub>) )  
**Emission Limit 1:** 0.2000 LB/TON STEEL  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Scrap Management Plan  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 2.0200 LB/TON STEEL

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Scrap management plan and good operating practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** EPA/OAR Mthd 7E

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.3500 LB/TON STEEL

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Scrap management plan and good operating practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Other  
**Other Test Method:** EPA Method 3A  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 109311.0000 TPY CO2E  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Caster #1  
**Process Type:** 81.230 (Casting & Pouring Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0620 LB/TON STEEL  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0620 LB/TON STEEL  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0620 LB/TON STEEL  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Ladle Preheaters  
**Process Type:** 81.220 (Hot Metal Transfer & Ladle Processes)  
**Primary Fuel:** Natural Gas  
**Throughput:** 12.10 MMBTU/HR  
**Process Notes:** SN-03 and SN-04 - Horizontal SN-05 and SN-06 - Vertical

**POLLUTANT NAME:** Particulate matter, filterable (FPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of natural gas and good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 µ (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO<sub>2</sub>)

**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SO<sub>x</sub>) )  
**Emission Limit 1:** 0.0006 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0824 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good operating practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0950 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Low NOX burners, Combustion of clean fuel, and good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Casting Process Heating Source  
**Process Type:** 81.230 (Casting & Pouring Processes)  
**Primary Fuel:** Natural Gas  
**Throughput:** 2.20 MMBtu/hr  
**Process Notes:** SN-07

**POLLUTANT NAME:** Particulate matter, filterable (FPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of natural gas and good combustion sources  
**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good combustion sources

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good combustion sources

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:** 0.0006 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of natural gas and good combustion sources  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0824 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of natural gas and good combustion sources  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102

**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0950 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Low NOX burners, Combustion of clean fuel, and Good Combustion Practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Lime Injection Burner  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:** Natural Gas

**Throughput:** 22.20 lb/MMBtu

**Process Notes:** SN-08

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of natural gas and good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:** 0.0006 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of natural gas and good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0824 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0950 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Low NOX burners, combustion of clean fuel, and good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 117.0000 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Air Separation Plant Water Vaporizer  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:** Natural Gas  
**Throughput:** 9.00 MMBtu/hr  
**Process Notes:** SN-09

**POLLUTANT NAME:** Particulate matter, filterable (FPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of natural gas and good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of natural gas and good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0075 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of natural gas and good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO<sub>2</sub>)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SO<sub>x</sub>) )  
**Emission Limit 1:** 0.0006 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0824 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.1000 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Low NOX burners, combustion of clean fuel, and good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Hydrogen Reformer Furnaces  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:** Natural Gas  
**Throughput:** 12.50 MMBtu/hr  
**Process Notes:** SN-10a and SN-10b, 12.5 MMBtu/hr each

**POLLUTANT NAME:** Particulate matter, filterable (FPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0023 LB/MMBTU  
**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0023 LB/MBBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0023 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO<sub>2</sub>)

**CAS Number:** 7446-09-5

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SO<sub>x</sub>) )

**Emission Limit 1:** 0.0002 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Combustion of natural gas and good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NO<sub>x</sub>)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NO<sub>x</sub>) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0024 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Low NO<sub>x</sub> burners, Combustion of clean fuel, and Good operating practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0004 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Combustion of natural gas and good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 117.0000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good operating practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Cooling Towers  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-11 through SN-16

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 % DRIFT LOSS

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Drift eliminators and low TDS

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 % DRIFT LOSS

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Drift eliminators and low TDS

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0005 % DRIFT LOSS  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Drift eliminators and low TDS  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Emergency Generators  
**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** Diesel  
**Throughput:** 0  
**Process Notes:** SN-17 through SN-20

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 G/BHP-HR  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1000 G/BHP-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1000 G/BHP-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart III  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:** 15.0000 PPM MAX FUEL CONTENT  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart III  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.9000 G/BHP-HR  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart III  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 3.9000 G/BHP-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 164.0000 LB/MMBTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

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Process/Pollutant Information
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**PROCESS NAME:** Emergency Water Pumps  
**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** Diesel  
**Throughput:** 0  
**Process Notes:** SN-21 and SN-22

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.0000 G/BHP-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.0000 G/BHP-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 1.0000 G/BHP-HR  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:** 15.0000 PPM MAX FUEL CONTENT  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide  
**CAS Number:** 630-08-0  
**Test Method:** ASTM Std D6522-00  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 3.0300 G/BHP-HR  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 14.0600 G/BHP-HR  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e

**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:** 164.0000 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Charging Crane  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-23

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 TPY  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Dust control plan  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1000 TPY

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Dust control plan

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1000 TPY

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Dust control plan

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

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Process/Pollutant Information
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**PROCESS NAME:** Scrap Yard Stockpiling  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-24

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.3000 TPY

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Dust control plan

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2000 TPY

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Dust control plan

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 TPY  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Dust control plan

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

### Process/Pollutant Information

**PROCESS NAME:** Receiving Systems  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-25, SN-27, SN-29, SN-31

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 TPY  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Dust Control Plan, Enclosed Receiving. System with Fabric Filter  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 TPY  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Dust Control Plan, Enclosed Receiving. System with Fabric Filter  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5  $\mu$  (TPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.1000 TPY  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (B) Dust Control Plan, Enclosed Receiving. System with Fabric Filter

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Storage and Handling Systems  
**Process Type:** 81.290 (Other Steel Manufacturing Processes)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:** SN-26, SN-28, SN-30, SN-32, SN-33, SN-34

**POLLUTANT NAME:** Particulate matter, total (TPM)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0100 GR/DSCF  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Dust Control Plan, Enclosed Conveyors with Fabric Filters, Enclosed Receiving System with Fabric Filter, Silos with Bin Vent Filters

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10  $\mu$  (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0100 GR/DSCF  
**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Dust Control Plan, Enclosed Conveyors with Fabric Filters, Enclosed Receiving System with Fabric Filter, Silos with Bin Vent Filters

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0100 GR/DSCF

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Dust Control Plan, Enclosed Conveyors with Fabric Filters, Enclosed Receiving System with Fabric Filter, Silos with Bin Vent Filters

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

## Facility Information

**RBLC ID:** LA-0324 (final)

**Corporate/Company Name:** COMMONWEALTH LNG, LLC

**Facility Name:** COMMONWEALTH LNG FACILITY

**Facility Contact:** HANS VERSWIJVER 3463524443 HVERSWIJVER@TEAMCPL.COM

**Facility Description:** New 65.1 bscf/year natural gas liquefaction facility

**Date Determination**

**Last Updated:** 02/27/2025

**Permit Number:** PSD-LA-841

**Permit Date:** 03/28/2023 (actual)

**FRS Number:** 110029511883

**SIC Code:** 4925

**Permit Type:** A: New/Greenfield Facility **NAICS Code:** 221210  
**Permit URL:**  
**EPA Region:** 6 **COUNTRY:** USA  
**Facility County:** CAMERON PARISH  
**Facility State:** LA  
**Facility ZIP Code:** 70631  
**Permit Issued By:** LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)  
MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV  
**Other Agency Contact Info:** Permit Writer: Dan Nguyen (225) 219-3395  
**Permit Notes:** Application Accepted Date reflects date of administrative completeness.  
**Facility-wide Emissions:**

<b>Pollutant Name:</b>	<b>Facility-wide Emissions Increase:</b>
Carbon Monoxide	917.4000 (Tons/Year)
Nitrogen Oxides (NOx)	375.6300 (Tons/Year)
Particulate Matter (PM)	223.9300 (Tons/Year)
Sulfur Oxides (SOx)	63.2500 (Tons/Year)
Volatile Organic Compounds (VOC)	151.9100 (Tons/Year)

<b>Process/Pollutant Information</b>
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**PROCESS NAME:** Refrigeration Turbines and Generator Turbines (EQT0001 - EQT0006 and EQT0013 - EQT0015)  
**Process Type:** 15.110 (Natural Gas (includes propane & liquified petroleum gas))  
**Primary Fuel:** natural gas  
**Throughput:** 575.00 mm btu/hr  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.0183 LB/MMBTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5  $\mu$  (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0183 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO<sub>2</sub>)

**CAS Number:** 7446-09-5

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SO<sub>x</sub>) )

**Emission Limit 1:** 0.0134 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and use of low sulfur fuels

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 2.5000 PPMVD @15% O2  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (B) Good combustion practices and use clean fuel. Dry low-NOx and selective catalytic reduction.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 1.7000 PPMVD @15% O2

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and use of clean fuel.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 3.0000 PPMVD @15% O2  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices and use of clean fuel.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
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**PROCESS NAME:** Flares (EQT0007 - EQT0010)  
**Process Type:** 19.390 (Other Flares)  
**Primary Fuel:** natural gas  
**Throughput:** 3.40 mm btu/hr  
**Process Notes:** (Pilot gas)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices (including work practices listed in 40 CFR 60.18); Burner optimization and flare gas recovery; Use of facility fuel gas for pilot and purge.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices (including work practices listed in 40 CFR 60.18); Burner optimization and flare gas recovery; Use of facility fuel gas for pilot and purge.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices (including work practices listed in 40 CFR 60.18); Burner optimization and flare gas recovery; Use of facility fuel gas for pilot and purge.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices (including work practices listed in 40 CFR 60.18); Burner optimization and flare gas recovery; Use of facility fuel gas for pilot and purge.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 μ (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices (including work practices listed in 40 CFR 60.18); Burner optimization and flare gas recovery; Use of facility fuel gas for pilot and purge.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

**CAS Number:** 7446-09-5

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices (including work practices listed in 40 CFR 60.18); Burner optimization and flare gas recovery; Use of facility fuel gas for pilot and purge.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Hot Oil Heater (EQT0021)  
**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** natural gas  
**Throughput:** 121.00 mm btu/hr  
**Process Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 µ (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and use of clean fuel. Minimization of operating time.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and use of clean fuel. Minimization of operating time

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

**CAS Number:** 7446-09-5

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )

**Emission Limit 1:** 0.0103 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Use of low sulfur fuels Good combustion practices. Minimization of operating time.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0700 LB/MM BTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices and use of clean fuel. Low-NOx burners  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.0824 LB/MM BTU  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices and use of clean fuel. Minimization of operating time.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.0054 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and use of clean fuel. Minimization of operating time.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Thermal Oxidizers (EQT0011 and EQT0012)

**Process Type:** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))

**Primary Fuel:** natural gas

**Throughput:** 65.40 mm btu/hr

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0490 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and use of clean fuel. Low NOx burners

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 μ (FPM2.5)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices and use of clean fuel.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)  
**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (P) Good combustion practices and use of clean fuel.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO2)  
**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Pretreating acid gas stream in H2S scavenger system. Good combustion practices and use of clean fuel.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 99.9000 % DRE

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and use of clean fuel.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 0.0824 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Good combustion practices and use of clean fuel.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Firewater Pump Engine (EQT0017 - EQT0020)

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** diesel

**Throughput:** 0

**Process Notes:** EQT0017, EQT0018, EQT0019 = 759 kw EQT0020 = 821 kw

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:** 0.4000 G/KW-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)

**CAS Number:** PM  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Particulate Matter (PM) )  
**Emission Limit 1:** 0.1250 G/KW-HR  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 5.5300 G/KW-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )  
**Emission Limit 1:** 0.5500 G/KW-HR  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO<sub>2</sub>)

**CAS Number:** 7446-09-5

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SO<sub>x</sub>) )

**Emission Limit 1:** 0.0015 LB/MM BTU

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 μ (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1250 G/KW-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Generator Engines (EQT0016)

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** diesel

**Throughput:** 4290.00 kw

**Process Notes:**

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds )

**Emission Limit 1:** 1.2100 G/KW-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:** 0.3220 G/KW-HR  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 2.5  $\mu$  (FPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0670 G/KW-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Sulfur Dioxide (SO<sub>2</sub>)

**CAS Number:** 7446-09-5  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Sulfur (SOx) )  
**Emission Limit 1:** 0.0015 LB/MM BTU  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0670 G/KW-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 8.4600 G/KW-HR

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

### Process/Pollutant Information

**PROCESS NAME:** Storage Vessels (EQT0022 - EQT0026)

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:** EQT0022: Condensate Tank EQT0023: Mixed Amine Tank EQT0024: Hot Oil Tank EQT0025: Propylene Glycol Tank EQT0026: Diesel 1 Tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:**

**Control Method:** (P) Fixed roofs

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Fugitive Emissions (FUG0001)  
**Process Type:** 99.999 (Other Miscellaneous Sources)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** U

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**

**Control Method:** (P) Appropriate component selection, design, and installation; Utilizing proper piping design; Compliance with LAC 33:III.2111; and LDAR.

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Facility-wide Greenhouse Gas Emissions  
**Process Type:** 99.999 (Other Miscellaneous Sources)  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)  
**CAS Number:** CO2e  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** U  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:**  
**Control Method:** (A) Using thermally efficient equipment; Low carbon fuels; Good combustion practices; Turbines and Hot Oil Heater: < 120 lbs of GHG/MM BTU  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

## Facility Information

<b>RBLC ID:</b>	TX-0955 (final)	<b>Date Determination</b>
		<b>Last Updated:</b> 04/12/2023
<b>Corporate/Company Name:</b>	INEOS OLIGOMERS USA LLC	<b>Permit Number:</b> 136130, N250M2
<b>Facility Name:</b>	INEOS OLIGOMERS CHOCOLATE BAYOU	<b>Permit Date:</b> 03/14/2023 (actual)
<b>Facility Contact:</b>	JEFFERY WOLF 281-581-4333	<b>FRS Number:</b> 110000463917
<b>Facility Description:</b>	As-built modifications to the Linear Alpha Olefins (LAO) and Poly Alpha Olefins (PAO) units	<b>SIC Code:</b> 2869
<b>Permit Type:</b>	D: Both B (Add new process to existing facility) & C (Modify process at existing facility)	<b>NAICS Code:</b> 325199
<b>Permit URL:</b>		
<b>EPA Region:</b>	6	<b>COUNTRY:</b> USA
<b>Facility County:</b>		
<b>Facility State:</b>	TX	
<b>Facility ZIP Code:</b>		
<b>Permit Issued By:</b>	TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name) MS. ANNE INMAN(Agency Contact) (512) 239-1267 anne.inman@tceq.texas.gov	
<b>Other Agency Contact Info:</b>	Mr. Jeff Greif, (512) 239-1534, Jeff.Greif@tceq.texas.gov	
<b>Permit Notes:</b>		
<b>Affected Boundaries:</b>	<b>Boundary Type:</b>	<b>Class 1 Area State:</b> <b>Boundary:</b> <b>Distance:</b>

**Process/Pollutant Information****PROCESS NAME:** COOLING TOWER HEAT EXCHANGER**Process Type:** 99.999 (Other Miscellaneous Sources)**Primary Fuel:****Throughput:** 0**Process Notes:****POLLUTANT NAME:** Volatile Organic Compounds (VOC)**CAS Number:** VOC**Test Method:** Unspecified**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )**Emission Limit 1:** 500.0000 PPBW**Emission Limit 2:****Standard Emission:****Did factors, other than air pollution technology considerations influence the BACT decisions:** N**Case-by-Case Basis:** LAER**Other Applicable Requirements:** MACT**Control Method:** (P) Monthly monitoring of Cooling Water return to the tower to watch for heat exchanger leaks**Est. % Efficiency:****Cost Effectiveness:** 0 \$/ton**Incremental Cost Effectiveness:** 0 \$/ton**Compliance Verified:** Unknown**Pollutant/Compliance Notes:****Process/Pollutant Information****PROCESS NAME:** EQUIPMENT FUGITIVES**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))**Primary Fuel:****Throughput:** 0**Process Notes:****POLLUTANT NAME:** Volatile Organic Compounds (VOC)**CAS Number:** VOC

**Test Method:** EPA/OAR Mthd 21  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** NSPS , MACT  
**Control Method:** (P) TCEQ 28LAER leak detection and repair (LDAR) quarterly instrument monitoring program with weekly AVO walk through checks and instrument directed repair  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS** Fixed roof storage tanks

**NAME:**

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:** Only liquids with vapor pressures of 0.1 psia or less are stored in fixed roof tanks, except for a small gasoline fuel tank. Vacuum trucks and frac tanks may be used in de-inventorying product liquid tanks without control

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** NSPS , SIP

**Control Method:** (P) Fixed roof tanks, painted white, has submerged fill. Air, nitrogen other purge gas, fans, blowers, or air movers may not be used on the tank, unless all the forced ventilated vapors are directed to control. Vacuum truck vents must limit VOC concentration to 100 ppmv. Frac Tanks with breathing potential must be white and bottom filled.

**Est. % Efficiency:**

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Internal Floating Roof Storage Tanks Normal and MSS

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

**Primary Fuel:**

**Throughput:** 0

**Process Notes:** Higher vapor pressure liquids (>0.1 psia), Crude PAO, 1-decane and 1-decene are stored in floating roof tanks

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER

**Other Applicable Requirements:** NSPS , MACT , SIP

**Control Method:** (B) Painted white, mechanical shoe primary seal, drain to 9 gal max and 99.9 % destruction efficiency by the thermal oxidizer (THOX) or 98 % control by flare. Degassing for de-inventory / maintenance must achieve a vapor concentration

**Est. % Efficiency:** 98.000

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** PAO Truck & Rail Loading  
**Process Type:** 64.005 (Transfer of SOCM Chemicals (loading/unloading, filling, etc.))  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** MACT , SIP

**Control Method:** (B) Truck and railcar loading of Poly Alpha Olefin products is not required to be controlled since the vapor pressures of these materials are less than 0.002 psia. No loading through defective lines or components, loading must stop if liquid leaks are detected. All loading shall be submerged or bottom loading. Truck and railcar loading of Linear Alpha Olefin products with vapor pressures over 0.1 psia are captured and directed to thermal oxidizer control and products with vapor pressures under 0.1 psia (actually less than 0.01 psia) are not required to be directed to add on control. Products with a VOC vapor pressure over 0.1 psia (lower than tier 1 BACT of 0.5psia), are directed to the thermal oxidizer for control. Tanks trucks handling liquids with a VOC vapor pressure over 0.10 psia must pass vapor tightness testing every 12 months using the methods described in Title 40 Code of Federal Regulations Part 63 (40 CFR 63), Subpart R, assumed to achieve a 99.2% capture. Railcar tankers handling liquids with a VOC vapor pressure over 0.10 psia must have a current certification in accordance with U.S. Department of Transportation (DOT) pressure test requirements of 49 CFR §173.31, assumed to achieve 100% capture. All loading lines and connectors must be visually inspected for defects before loading and not used if damaged and loading must be stopped if a leak is detected. The thermal oxidizer has a 99.9% destruction efficiency. All loading shall be submerged or bottom loading.

**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Process vessel vents and MSS emissions  
**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:**

**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )

**Emission Limit 1:**

**Emission Limit 2:**

**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER

**Other Applicable Requirements:** NSPS , MACT , SIP

**Control Method:** (B) Vessel piping directs normal and MSS waste gas to the thermal oxidizer for a 99.9 % destruction efficiency or the flare as necessary for a 98 % destruction efficiency. Capture systems have monthly AVO checks with a Method 21 leak check and no bypass is authorized. The MSS VOC vapors to atmosphere must be less than 10,000 ppmv as methane or 3% of the LEL. Vacuum truck vents must limit VOC concentration to 100 ppmv. Frac Tanks with breathing potential must be white and bottom filled. Air, nitrogen other purge gas, fans, blowers, or air movers may not be used on the equipment or vessel being cleared when it is open to the atmosphere. The thermal oxidizer and then the flare are the add on control for normal process waste gas and MSS emissions where vessels and equipment contain VOC with a partial pressure greater than 0.10 psia. The thermal oxidizer and flare have a monthly AVO capture check and annual instrument monitoring and are not authorized for bypass. Vacuum trucks and frac tanks may be used in MSS liquid removal with control. Vessel degassing to the atmosphere occurs after de-inventory and dilution of liquids, depressurization, and vessel purging to control.

**Est. % Efficiency:** 98.000

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**

### Process/Pollutant Information

**PROCESS NAME:** THERMAL OXIDIZER

**Process Type:** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))

**Primary Fuel:** NATURAL GAS

**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** SIP  
**Control Method:** (P) Burner design for good combustion and to minimize NOx formation.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** FLARE  
**Process Type:** 19.310 (Chemical Plant Flares)  
**Primary Fuel:** NATURAL GAS  
**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:**  
**Control Method:** (P) Burner tip design and supplemental fuel control assure combustion, open air combustion does not add temperature to the NOx formation potential  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** LAO and PAO Barge Loading  
**Process Type:** 64.005 (Transfer of SOCOMI Chemicals (loading/unloading, filling, etc.))  
**Primary Fuel:**  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**

**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** MACT , SIP

**Control Method:** (B) Vacuum loading through a closed vent system to the marine vapor combustor is required for all loading of liquids with a VOC vapor pressure over 0.10 psia, to assure 100% capture. All loading lines and connectors must be visually inspected for defects before loading and not used if damaged and loading must be stopped if a leak is detected. All loading shall be submerged or bottom loading.

**Est. % Efficiency:** 99.900  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information

**PROCESS NAME:** Marine Vapor Combustor Unit (MCVU)  
**Process Type:** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))  
**Primary Fuel:** NATURAL GAS

**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** MACT , SIP  
**Control Method:** (P) Burner design for good combustion and to minimize NOx formation.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** HOT OIL HEATER  
**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** NATURAL GAS  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0140 LB/MMBTU 1-HR  
**Emission Limit 2:** 0.0060 LB/MMBTU ANNUAL AVG  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER

**Other Applicable Requirements:** SIP  
**Control Method:** (B) Burner design for good combustion efficiency and to minimize NOx formation with a SCR system to further reduce NOx.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** SIP  
**Control Method:** (P) Burner design for high efficiency combustion.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** HEATER NO 2  
**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))  
**Primary Fuel:** NATURAL GAS  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified

**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 0.0100 LB/MMBTU 1-HR  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N

**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** SIP  
**Control Method:** (P) Burner design for good combustion efficiency and to minimize NOx formation.  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** SIP  
**Control Method:** (P) Burner design for good combustion efficiency  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

Process/Pollutant Information
-------------------------------

**PROCESS NAME:** Engine Emergency Generator  
**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))  
**Primary Fuel:** DIESEL  
**Throughput:** 0

**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:** 3.9000 G/HP HR  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** NSPS  
**Control Method:** (P) TIER III ENGINE, OPERATIONS LIMITED TO 100 HRS/YR  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** NSPS  
**Control Method:** (P) TIER III  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**PROCESS NAME:** FILTER OVEN  
**Process Type:** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))  
**Primary Fuel:** NATURAL GAS  
**Throughput:** 0  
**Process Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)  
**CAS Number:** 10102  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** SIP  
**Control Method:** (P) Efficiency burner and enclosed combustion  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown  
**Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)  
**CAS Number:** VOC  
**Test Method:** Unspecified  
**Pollutant Group(s):** ( Volatile Organic Compounds (VOC) )  
**Emission Limit 1:**  
**Emission Limit 2:**  
**Standard Emission:**  
**Did factors, other than air pollution technology considerations influence the BACT decisions:** N  
**Case-by-Case Basis:** LAER  
**Other Applicable Requirements:** SIP  
**Control Method:** (P) Efficiency burner and enclosed combustion  
**Est. % Efficiency:**  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:**