

Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

OCT 01 2019

Mr. Ryan Ruckel  
ESH Manager  
Base Rock Minerals – Fruitland Quarry  
2833 Breckenridge Industrial Court  
St. Louis, MO 63144

RE: New Source Review Permit – Project Number: 2019-06-050

Dear Mr. Ruckel:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions and your new source review permit application is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).



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Mr. Ryan Ruckel  
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If you have any questions regarding this permit, please contact Ryan Schott, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



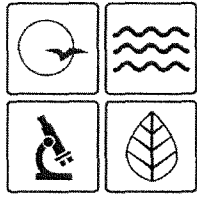
Susan Heckenkamp  
New Source Review Unit Chief

SH:rs

Enclosures

c: Southeast Regional Office  
PAMS File: 2019-06-050

Permit Number: **102019-001**



**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

**MISSOURI AIR CONSERVATION COMMISSION**

**PERMIT TO CONSTRUCT**

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **102019-001** Project Number: 2019-06-050  
Installation Number: 031-0124

Parent Company: BRM, LLC

Parent Company Address: 2833 Breckenridge Industrial Court, St. Louis, MO 63144

Installation Name: Base Rock Minerals – Fruitland Quarry

Installation Address: 5154 US Highway 61, Jackson, MO 63755

Location Information: Cape Girardeau County (S20, T32N, R13E)

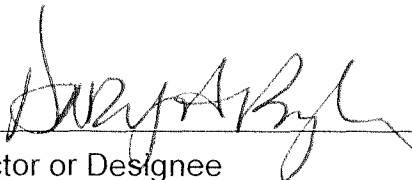
Application for Authority to Construct was made for:

The installation of a new cone crusher and the modification of the material flow path through existing equipment. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

  
\_\_\_\_\_  
Director or Designee  
Department of Natural Resources

OCT 01 2019

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Effective Date

## STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Enforcement and Compliance Section of the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of startup of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual startup of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit using the contact information below.

Contact Information:  
Missouri Department of Natural Resources  
Air Pollution Control Program  
P.O. Box 176  
Jefferson City, MO 65102-0176  
(573) 751-4817

The regional office information can be found at the following website:  
<http://dnr.mo.gov/regions/>

**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted to the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (3)(E). "Conditions required by permitting authority."*

Base Rock Minerals – Fruitland Quarry  
Cape Girardeau County (S20, T32N, R13E)

1. Superseding Condition  
The conditions of this permit supersede Special Condition 2 of Construction Permit No. 122010-013B, previously issued by the Air Pollution Control Program.
2. PM<sub>10</sub> Emission Limitation
  - A. Base Rock Minerals – Fruitland Quarry shall emit less than 15.0 tons of PM<sub>10</sub> in any consecutive 12-month period from the entire installation, which includes the equipment listed in Table 2. This limit shall include all startup, shutdown, and malfunction (SSM) emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section.
  - B. Attachment A or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 2.A.
3. Best Management Practices  
Base Rock Minerals – Fruitland Quarry shall control fugitive emissions from all haul roads and vehicular activity areas by performing Best Management Practices, as defined in Attachment B.
4. Record Keeping and Reporting Requirements
  - A. Base Rock Minerals – Fruitland Quarry shall maintain all records required by this permit for not less than five years and shall make them available immediately to Missouri Department of Natural Resources' personnel upon request.
  - B. Base Rock Minerals – Fruitland Quarry shall report to the Air Pollution Control Program's Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or at [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (5) REVIEW

Project Number: 2019-06-050  
Installation ID Number: 031-0124  
Permit Number: 102019-001

Installation Address:

Base Rock Minerals – Fruitland Quarry  
5154 US Highway 61  
Jackson, MO 63755  
Cape Girardeau County (S20, T32N, R13E)

Parent Company:

BRM, LLC  
2833 Breckenridge Industrial Court  
St. Louis, MO 63144

REVIEW SUMMARY

- Base Rock Minerals – Fruitland Quarry has applied for authority to install a new cone crusher and modify the material flow path through the existing equipment.
- The application was deemed complete on July 23, 2019.
- HAP emissions are not expected from the project.
- 40 CFR 60 Subpart OOO, *Standards of Performance for Nonmetallic Mineral Processing Plants*, applies to the equipment.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- No air pollution control equipment is being used with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. PM emissions are above the de minimis level but below the major source level. PM<sub>10</sub> emissions (and subsequently PM<sub>2.5</sub> emissions) are conditioned below the de minimis level.
- This installation is located in Cape Girardeau County, an attainment/unclassifiable area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed as a part of this review. Although PM emissions exceed the de minimis level, no ambient air quality standards currently exist for PM.
- Emissions testing is not required for the equipment as a part of this permit. Testing may be required as part of other state, federal, or applicable rules.

- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

## INSTALLATION DESCRIPTION

Base Rock Minerals operates a stationary rock crushing plant at Fruitland Quarry in Jackson, Missouri. The plant is capable of crushing up to 650 tons of rock per hour and operates using line power. Table 1 provides a list of New Source Review permits that have been issued to Base Rock Minerals – Fruitland Quarry from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
122010-013	Installation of a new stationary rock crushing plant
122010-013A	Remove concurrent operation restriction and NAAQS limit
122010-013B	Removal of generator and switch to line power

## PROJECT DESCRIPTION

Base Rock Minerals – Fruitland Quarry is proposing to install a new cone crusher and modify the material flow path through the existing equipment. The new cone crusher, along with its two associated conveyors, will have a maximum design rate of 400 tons per hour. The material flow path will be redirected at the 30"x60' stacker (EP-13). Instead of passing through the existing secondary VSI cone crusher (EP-03), the rock will pass through the new cone crusher feed conveyor (EP-16) and then the new cone crusher (EP-17). The new under cone conveyor (EP-18) will then route the material to the 30"x60' stacker (EP-14). Rock will also be routed to the new cone crusher feed conveyor (EP-16) after being handled by the 36"x80' conveyor (EP-15). The material will still have the option of passing through the existing secondary VSI cone crusher (EP-03), but only after passing through the 6'x20' screen (EP-04), the tertiary screen discharge conveyor (EP-05D), and the 36"x80' conveyor (EP-15).

This project will also serve as a true-up, to account for three stackers and four conveyors that were installed in place of six load out bins that were originally listed in Construction Permit No. 122010-013. The product haul road (EP-07B) is being updated to the correct length of 1,300 feet, and the potential emissions from hauling material from the processing plant to the stockpiles (EP-19) will be added.

The maximum design rate of the primary crusher will remain unchanged at 650 tons per hour. None of the other existing equipment will be altered; however, the installation of new equipment and re-routing of the material flow path will cause a change in which equipment is considered the worst-case for potential emissions. Table 2 provides an updated list of all equipment at the installation.

Table 2: Installation Equipment List

Emission Point	Description	Project Status	Previous Maximum Design Rate (ton/hr)	New Maximum Design Rate* (ton/hr)
EP-01	Primary Crusher Jaw	Unchanged	650	650
EP-02	Primary Screen	Unchanged	650	650
EP-03	Secondary VSI Cone Crusher	Revised	400	-
EP-04	6'x20' Screen	Unchanged	400	400
EP-05A	Under Jaw Belt Conveyor	Unchanged	650	650
EP-05B	Screen Discharge Conveyors (4)	Unchanged	650	650
EP-05C	Under VSI Conveyor	Revised	400	-
EP-05D	Tertiary Screen Discharge Conveyors (4)	Unchanged	400	400
EP-06A	Shot Rock Storage Pile	Unchanged	650	650
EP-06B	Product Storage Piles	Unchanged	650	650
EP-07A	Shot Rock Truck Hauling	Unchanged	650	650
EP-07B	Product Haul Road	Revised	650	650
EP-11	Pan Feeder	Unchanged	650	650
EP-12	30"x60' Stacker	As-Built	650	650
EP-13	30"x60' Stacker	As-Built	650	650
EP-14	30"x60' Stacker	As-Built	400	400
EP-15	Conveyors (4)	As-Built	400	400
EP-16	Cone Crusher Feed Conveyor	New	-	400
EP-17	Cone Crusher	New	-	400
EP-18	Under Cone Conveyor	New	-	400
EP-19	Stockpile	As-Built	-	400

\*A dash in this column indicates the emission point is not the worst-case material flow path for potential emissions

## EMISSIONS/CONTROLS EVALUATION

Emissions for the project were calculated using emission factors found in the EPA document: *AP-42 Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, Fifth Edition (AP-42).

Emissions from the rock crushing, screening, and handling equipment were calculated using emission factors taken from AP-42 Section 11.19.2 *Crushed Stone Processing and Pulverized Mineral Processing* (August 2004). The controlled emission factors were used because the inherent moisture content of the rock is at least 1.5% by weight, as required by Special Condition 5 of Construction Permit No. 122010-013.

Particulate emissions from haul roads and vehicular activity areas were calculated using the predictive equation taken from AP-42 Section 13.2.2 *Unpaved Roads* (November 2006). A 90% control efficiency for PM and PM<sub>10</sub> and a 74% control efficiency for PM<sub>2.5</sub>



were applied to the emission calculations for the use of Best Management Practices.

Particulate emissions from the load in and load out of storage piles were calculated using the predictive equation taken from AP-42 Section 13.2.4 *Aggregate Handling and Storage Piles* (November 2006). Particulate emissions from wind erosion of storage piles were calculated using an equation found in the Air Pollution Control Program's Emissions Inventory Questionnaire (EIQ) Form 2.8 *Storage Pile Worksheet*.

Table 3 provides an emissions summary for this project. Existing potential emissions were taken from the installation's previous construction permit (122010-013B). Existing actual emissions were taken from the installation's most recent EIQ. Potential emissions of the project represent the updated potential of all equipment at the installation, assuming continuous operation (8,760 hours per year).

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2018 EIQ)	Potential Emissions of the Project	New Installation Conditioned Potential
PM	25.0	N/D	N/D	303.20	41.53
PM <sub>10</sub>	15.0	<15.0	5.45	109.16	<15.0
PM <sub>2.5</sub>	10.0	4.94	0.62	22.26	3.05
SO <sub>x</sub>	40.0	N/A	N/D	N/A	N/A
NO <sub>x</sub>	40.0	N/A	N/D	N/A	N/A
VOC	40.0	N/A	N/D	N/A	N/A
CO	100.0	N/A	N/D	N/A	N/A
Total HAPs	25.0	N/A	N/D	N/A	N/A

N/A = Not Applicable; N/D = Not Determined

#### PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential PM emissions are above the de minimis level but below the major source level. PM<sub>10</sub> emissions (and subsequently PM<sub>2.5</sub> emissions) are conditioned below the de minimis level.

#### APPLICABLE REQUIREMENTS

Base Rock Minerals – Fruitland Quarry shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

## GENERAL REQUIREMENTS

- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
  - Per 10 CSR 10-6.110 (4)(B)2.C. a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.
- *Restriction of Emission of Odors*, 10 CSR 10-6.165
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220

## SPECIFIC REQUIREMENTS

- *New Source Performance Regulations*, 10 CSR 10-6.070
  - *Standards of Performance for Nonmetallic Mineral Processing Plants*, 40 CFR Part 60, Subpart OOO

## STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, it is recommended that this permit be granted with special conditions.

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated June 18, 2019, received June 21, 2019, designating BRM, LLC as the owner and operator of the installation.

## Attachment A: PM<sub>10</sub> Compliance Worksheet

Base Rock Minerals – Fruitland Quarry  
Cape Girardeau County (S20, T32N, R13E)

Project Number: 2019-06-050

Installation ID Number: 031-0124

Permit Number: **102019-001**

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_.  
(month, year) (month, year)

Month	Production (tons)	Emission Factor (lb/ton)	Monthly Emissions <sup>1</sup> (lbs)	SSM Emissions <sup>2</sup> (tons)	Monthly Emissions <sup>3</sup> (tons)	12-Month Total Emissions <sup>4</sup> (tons)
<i>Example</i>	<i>65,000</i>	<i>0.0383</i>	<i>2,490</i>	<i>N/A</i>	<i>1.24</i>	<i>14.94</i>
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<sup>1</sup> Multiply the monthly production by the emission factor.  
<sup>2</sup> Enter the monthly startup, shutdown, and malfunction (SSM) emissions, as reported to the Air Pollution Control Program’s Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050.  
<sup>3</sup> Divide the monthly emissions (lbs) by 2,000 and add the SSM emissions.  
<sup>4</sup> Add the monthly emissions (tons) to the sum of the monthly emissions for the previous eleven months. A total of less than **15.0** tons of PM<sub>10</sub> in any consecutive 12-month period is necessary for compliance with Special Condition 2.

## Attachment B: Best Management Practices

Haul roads and vehicular activity areas shall be maintained in accordance with at least one of the following options when the plant is operating.

1. Pavement

- A. The operator shall pave the area with materials such as asphalt, concrete or other materials approved by the Air Pollution Control Program. The pavement will be applied in accordance with industry standards to achieve control of fugitive emissions<sup>1</sup> while the plant is operating.
- B. Maintenance and repair of the road surface will be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these areas while the plant is operating.
- C. The operator shall periodically wash or otherwise clean all of the paved portions of the haul roads as necessary to achieve control of fugitive emissions from these areas while the plant is operating.

2. Application of Chemical Dust Suppressants

- A. The operator shall apply a chemical dust suppressant (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) to unpaved areas.
- B. The quantities of the chemical dust suppressant shall be applied and maintained in accordance with the manufacturer's recommendation (if available) and in sufficient quantities to achieve control of fugitive emissions from these areas while the plant is operating.
- C. The operator shall record the time, date and the amount of material applied for each application of the chemical dust suppressant agent on the above areas. The operator shall keep these records with the plant for not less than five (5) years and make these records available to Department of Natural Resources' personnel upon request.

3. Application of Water – Documented Daily

- A. The operator shall apply water to unpaved areas. Water shall be applied at a rate of 100 gallons per day per 1,000 square feet of unpaved or untreated surface area while the plant is operating.
- B. Precipitation may be substituted for watering if the precipitation is greater than one quarter of one inch and is sufficient to control fugitive emissions.
- C. Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads.
- D. The operator shall record the date and volume of water application or the amount of precipitation that day. The operators shall also record the rationale for not watering (e.g. freezing conditions or not operating).
- E. The operator shall keep these records with the plant for not less than five (5) years, and the operator shall make these records available to Department of Natural Resources' personnel upon request.

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<sup>1</sup> For purposes of this document, Control of Fugitive Emissions means to control particulate matter that is not collected by a capture system and visible emissions to the extent necessary to prevent violations of the air pollution law or regulation. (Note: control of visible emission is not the only factor to consider in protection of ambient air quality.)

## APPENDIX A

### Abbreviations and Acronyms

<b>%</b> .....	percent	<b>Mgal</b> .....	1,000 gallons
<b>°F</b> .....	degrees Fahrenheit	<b>MW</b> .....	megawatt
<b>acfm</b> .....	actual cubic feet per minute	<b>MHDR</b> .....	maximum hourly design rate
<b>BACT</b> .....	Best Available Control Technology	<b>MMBtu</b> .....	Million British thermal units
<b>BMPs</b> .....	Best Management Practices	<b>MMCF</b> .....	million cubic feet
<b>Btu</b> .....	British thermal unit	<b>MSDS</b> .....	Material Safety Data Sheet
<b>CAM</b> .....	Compliance Assurance Monitoring	<b>NAAQS</b> ....	National Ambient Air Quality Standards
<b>CAS</b> .....	Chemical Abstracts Service	<b>NESHAPs</b>	National Emissions Standards for Hazardous Air Pollutants
<b>CEMS</b> .....	Continuous Emission Monitor System	<b>NO<sub>x</sub></b> .....	nitrogen oxides
<b>CFR</b> .....	Code of Federal Regulations	<b>NSPS</b> .....	New Source Performance Standards
<b>CO</b> .....	carbon monoxide	<b>NSR</b> .....	New Source Review
<b>CO<sub>2</sub></b> .....	carbon dioxide	<b>PM</b> .....	particulate matter
<b>CO<sub>2e</sub></b> .....	carbon dioxide equivalent	<b>PM<sub>2.5</sub></b> .....	particulate matter less than 2.5 microns in aerodynamic diameter
<b>COMS</b> .....	Continuous Opacity Monitoring System	<b>PM<sub>10</sub></b> .....	particulate matter less than 10 microns in aerodynamic diameter
<b>CSR</b> .....	Code of State Regulations	<b>ppm</b> .....	parts per million
<b>dscf</b> .....	dry standard cubic feet	<b>PSD</b> .....	Prevention of Significant Deterioration
<b>EQ</b> .....	Emission Inventory Questionnaire	<b>PTE</b> .....	potential to emit
<b>EP</b> .....	Emission Point	<b>RACT</b> .....	Reasonable Available Control Technology
<b>EPA</b> .....	Environmental Protection Agency	<b>RAL</b> .....	Risk Assessment Level
<b>EU</b> .....	Emission Unit	<b>SCC</b> .....	Source Classification Code
<b>fps</b> .....	feet per second	<b>scfm</b> .....	standard cubic feet per minute
<b>ft</b> .....	feet	<b>SDS</b> .....	Safety Data Sheet
<b>GACT</b> .....	Generally Available Control Technology	<b>SIC</b> .....	Standard Industrial Classification
<b>GHG</b> .....	Greenhouse Gas	<b>SIP</b> .....	State Implementation Plan
<b>gpm</b> .....	gallons per minute	<b>SMAL</b> .....	Screening Model Action Levels
<b>gr</b> .....	grains	<b>SO<sub>x</sub></b> .....	sulfur oxides
<b>GWP</b> .....	Global Warming Potential	<b>SO<sub>2</sub></b> .....	sulfur dioxide
<b>HAP</b> .....	Hazardous Air Pollutant	<b>SSM</b> .....	Startup, Shutdown & Malfunction
<b>hr</b> .....	hour	<b>tph</b> .....	tons per hour
<b>hp</b> .....	horsepower	<b>tpy</b> .....	tons per year
<b>lb</b> .....	pound	<b>VMT</b> .....	vehicle miles traveled
<b>lbs/hr</b> .....	pounds per hour	<b>VOC</b> .....	Volatile Organic Compound
<b>MACT</b> .....	Maximum Achievable Control Technology		
<b>µg/m<sup>3</sup></b> .....	micrograms per cubic meter		
<b>m/s</b> .....	meters per second		