



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

APR 03 2020

Mr. David Vasbinder
Environmental Manager
Lemons Sanitary Landfill
15250 Old Bloomfield Drive
Dexter, MO 63841

RE: New Source Review Permit - Project Number: 2019-07-009

Dear Mr. Vasbinder:

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, your new source review permit application and with your amended operating permit 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.

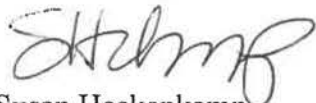


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If you have any questions regarding this permit, please do not hesitate to contact Russell Osborne, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



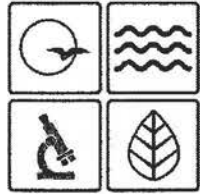
Susan Heckenkamp
New Source Review Unit Chief

SH:roj

Enclosures

c: Southeast Regional Office
PAMS File: 2019-07-009

Permit Number: **042020-001**



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: **042020-001**

Project Number: 2019-07-009
Installation Number: 207-0062

Parent Company: Lemons Landfill, LLC

Parent Company Address: 15250 Old Bloomfield Drive, Dexter, MO 63841

Installation Name: Lemons Sanitary Landfill

Installation Address: 15250 Old Bloomfield Drive, Dexter, MO 63841

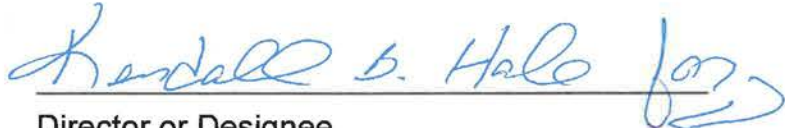
Location Information: Stoddard County, S2/11, T25N, R10E

Application for Authority to Construct was made for:

Vertical expansion of 1,291,116 cubic meters. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

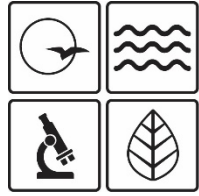
Standard Conditions (on reverse) and Special Conditions are applicable to this permit.



Director or Designee
Department of Natural Resources

APR 03 2020

Effective Date



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

Director or Designee
Department of Natural Resources

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 start up 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 start up 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."

Lemons Sanitary Landfill
Stoddard County, S2/11, T25N, R10E

1. Control Device Requirement – Flare
 - A. Lemons Sanitary Landfill shall control emissions from the landfill expansion area using a flare as specified in the permit application.
 - B. The flare shall be operated and maintained in accordance with the manufacturer's specifications, a copy of which shall be kept on site.
 - C. Lemons Sanitary Landfill shall maintain an operating and maintenance log for the flare which shall include the following
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
2. Record Keeping and Reporting Requirements
 - A. Lemons Sanitary Landfill shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request.
3. LFG Sulfur Content Testing
 - A. Total sulfur content in the LFG prior to combustion shall not exceed 500 ppmv.
 - B. Lemons Sanitary Landfill shall test LFG collected before the LFG enters the flare.
 - C. Test method ASTM D-5504, or an alternative method preapproved by the Air Pollution Control Program Compliance/Enforcement Section, shall be used.
 - D. Lemons Sanitary Landfill shall notify the Missouri Air Pollution Control Program Compliance/Enforcement Section within 30 days after accepting waste into the expansion area. May use email:
AirComplianceReporting@dnr.mo.gov

SPECIAL CONDITIONS:

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

- E. A completed proposed Test Plan Form (enclosed) shall be submitted to the Compliance/Enforcement Section at least 30 days prior to the proposed initial test date so that the Compliance/Enforcement Section may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and shall be approved by the Air Pollution Control Program Compliance/Enforcement Section prior to conducting the required initial emission testing. Subsequent tests do not require prior notification.
- F. Initial testing shall be performed within 180 days after the installation starts to accept waste in the expansion area. Lemons Sanitary Landfill shall notify the Missouri Air Pollution Control Program Compliance/Enforcement Section within 30 days after accepting waste in the expansion area. Subsequent testing shall be performed according to the following schedule
May use email: AirComplianceReporting@dnr.mo.gov
- 1) Testing shall be continued once per quarter. No consecutive tests shall be performed within one (1) month of each other.
 - 2) If four (4) consecutive quarterly tests indicate a concentration not
- G. One electronic copy of a written report of the performance test results shall be submitted to StackTesting@dnr.mo.gov within 60 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.
- H. If results from any tests required in Special Conditions 3.D. show an exceedance of the sulfur content limit in Special Condition 3.A., Lemons Sanitary Landfill shall submit an Application for Authority to Construct to the Air Pollution Control Program's New Source Review Unit within 90 days of the exceedance. The application shall account for the revised project emissions and any ambient impact modeling required due to the exceedance.

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

Project Number: 2019-07-009
Installation ID Number: 207-0062
Permit Number:

Installation Address:
Lemons Sanitary Landfill
15250 Old Bloomfield Drive
Dexter, MO 63841

Parent Company:
Lemons Landfill, LLC
15250 Old Bloomfield Drive
Dexter, MO 63841

Stoddard County, S2/11, T25N, R10E

REVIEW SUMMARY

- Lemons Sanitary Landfill has applied for authority to vertically expand its existing landfill by 1.291 million cubic meters.
- HAP emissions are expected from the flare, but only in amounts less than their respective SMAL.
- The New Source Performance Standard (NSPS), 40 CFR 60 Subpart WWW, "Standards of Performance for Municipal Solid Waste Landfills" applies to the landfill as Lemons Sanitary Landfill has made modifications on or after May 30, 1991. Lemons Sanitary Landfill shall comply with 40 CFR § 60.752(b)(2)(iii)(A) by directing the captured landfill gas to an open flare.
- NSPS, 40 CFR 60 Subpart XXX, "Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification After July 17, 2014" applies to the landfill as Lemons Sanitary Landfill has made modifications on or after July 17, 2014.
- Maximum Achievable Control Technology (MACT), 40 CFR 63 Subpart AAAA, "Municipal Solid Waste Landfills" applies to the installation as Lemons Sanitary Landfill has a design capacity greater than 2.5 million cubic meters with an uncontrolled potential of non-methane organic compound in excess of 50 megagrams a year.
- NSPS, 40 CFR 60 Subpart Cc, "Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills" does **not** apply as the subpart is applicable to municipal solid waste (MSW) landfills commencing reconstruction or modification before May 30, 1991.
- A flare is being used to control the methane (CH₄), volatile organic compounds (VOCs), and hazardous air pollutants (HAPs) emissions from the landfill, generating combustion emissions.

- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions increase for the project of all criteria pollutants are below *de minimis* levels.
- This installation is located in Stoddard 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 for this review as the potential emissions of all criteria pollutants is below *de minimis*.
- Emissions testing is not required for this equipment.
- An application to amend the installations Part 70 Operating Permit (OP2018-013) is required within one year of permit issuance.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Lemons Sanitary Landfill is a municipal solid waste landfill located in Dexter, Missouri that has operated since 1994. Originally, the design capacity was 3,590,000 cubic meters. In 1996 the design capacity was increased to 4,970,000 cubic meters. Later in 2014, the design capacity was again increased to 10,980,000 cubic meters.

Additional emission points at the site include three haul roads (EP-02, EP-03, EP-04), two 10,000 gallon diesel storage tanks (EP-05, EP-06), a used oil space heater (EP-07), and a propane fired heater (EP-09). The emissions from these points were previously permitted, therefore, they were not included in the emission calculations for this project. Haul road traffic is not expected to increase as the vehicular activity will remain only on the operating face of the landfill.

The following New Source Review permits have been issued to Lemons Sanitary Landfill from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
052001-016	Installation of a Flare
012014-007	Horizontal Expansion and Gas Collection System

PROJECT DESCRIPTION

Lemons Sanitary Landfill has proposed to increase its waste capacity by 1,291,116 cubic meters. The total design capacity of the facility, post expansion, is 12,295,965 cubic meters. Lemons Sanitary Landfill utilizes a gas collection and control system (GCCS) to collect the generated landfill gas (LFG). Once collected, the LFG will be exhausted through the existing 2,000 scfm open flare (EU-08).

Missouri Department of Natural Resources Solid Waste Management Program approved for the proposed vertical expansion in May 2018. The expansion will increase waste capacity to approximately 12,295,965 cubic meters. The vertical expansion modifies the current permitted final contours to a maximum side slope of 4:1 and minimum slope of 10% on the landfill crown. Additionally, the highest point of the landfill was raised from 610 to 650 feet mean sea level.

EMISSIONS/CONTROLS EVALUATION

The decomposition of encapsulated solid waste within a landfill is known to produce LFG, typically consisting of 50 percent methane (CH₄) and 50 percent carbon dioxide (CO₂). Trace amounts of non-methane organic compounds (NMOC), oxygen, hydrogen sulfide, and reactive organic gases are also present. NMOC's consist of various hazardous air pollutants (HAPs), volatile organic compounds (VOCs), greenhouse gases, and compounds associated with stratospheric ozone depletion, which do not contribute significantly to the heating value of the LFG.

The emission factors used in this analysis were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Chapter 2.4, "Municipal Solid Waste Landfills" (October 2008).

The amount of LFG generated by the facility was estimated using the EPA software LandGEM, version 3.02. To calculate the total LFG before the vertical expansion, the known amount of waste accepted by the landfill from 1994 to 2018 was entered. Thereafter, a growth rate of 1.5% was used from 2019 through the year 2043. The acceptance rate for 2044, the pre-expansion closure year, was the remainder of the available capacity up to the design capacity. To calculate the total LFG after the expansion, the growth rate of 1.5% was used from 1994 through the year 2050. The acceptance rate of 2051, the post-expansion closure year, was the remainder of the available capacity. For the project LFG generation rate, only the waste acceptance from 2044 to 2051 was used. The waste acceptance used for 2044 is the difference in the 1.5% growth value and the value of waste already in place from the pre-expansion closure value. Again, a 1.5% growth rate was used from 2045 through the year 2050 and the acceptance rate in 2051 was the remainder of the available capacity. In summary, to determine the potential emissions of the project, the pre-expansion calculated emissions are subtracted from the post-expansion calculated emissions with a closure year of 2051.

LandGEM, version 3.02, uses weight as the measure for waste in place rather than volume. To account for the increased packing efficiency of waste, a value of 10,371,613 megagrams was used for the weight design capacity of the landfill.

The values used in the model for the CH₄ generation potential (L₀) and CH₄ generation constant (k) were the AP-42 recommended values of 100 cubic meters per Mg and 0.04 per year, respectively. Lacking site-specific sulfur concentration, a limit on the concentration of sulfur (500 ppmv) was used to demonstrate compliance with 10 CSR 10-6.260. Additional testing will be required to ensure this concentration is correct.

The AP-42 default concentration of CH₄ in LFG is 50%; however, site specific information from the EPA greenhouse gas reporting website shows a CH₄ concentration of 53%. Additionally, the NMOC concentration used was 838, a number EPA document AP-42 recommends for waste in place after 1992.

The LFG generated is used to calculate pollutant emissions from the landfill. Because the landfill continually accepts waste, the annual LFG generated by the landfill will increase every year until the closure of the landfill. Therefore, the emission of the pollutants would increase every year as well. The potential emissions are from the year with the highest LFG generation, 2051.

The flare is designed to control NMOC at 99.2%, non-halogenated compounds at 98.0%, and halogenated compounds at 99.7% destruction efficiency. When determining CH₄ emissions, it is assumed that the combustion efficiency is 98%, in accordance with AP-42, Chapter 13.5, "*Industrial Flares*" (September 1991).

The VOC emissions were calculated by assuming that all NMOCs are VOCs and applying the 85% capture efficiency of GCCS and the 99.2% destruction efficiency of the open flare. Controlled HAP emissions were calculated using uncontrolled HAP emissions from LandGEM 3.02 and applying an 85% capture efficiency and either a 99.2% destruction efficiency for HAPs that are also VOCs or a 99.7% destruction efficiency for halogenated HAPs. PM_{2.5}, PM₁₀, NO_x, SO_x, and CO emissions were calculated using emission factors from AP-42, Chapter 2.4. The potential emissions of all criteria pollutants are below *de minimis*; therefore, no modeling was performed.

The following table provides an emissions summary for this project. Existing potential emissions were taken from Lemons Sanitary Landfill current operating permit (OP2018-013), as well as, the greenhouse gas emissions reporting website (ghgdata.epa.gov). Existing actual emissions were taken from the installation's 2018 EIQ. Potential emissions of the application represent the potential of the proposed expansion.

Table 2: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Actual Emissions (2018 EIQ)	Installation PTE Pre Expansion	Emissions Increase due to Expansion	Installation PTE Post Expansion
PM	25.0	N/D	4.10	1.50	5.21
PM ₁₀	15.0	11.77	4.10	1.20	4.18
PM _{2.5}	10.0	3.00	4.08	1.20	4.18
SO _x	40.0	1.67	8.30	12.37	42.98
NO _x	40.0	4.78	10.60	3.13	10.86
VOC	40.0	4.75	0.32	1.98	6.79
CO	100.0	5.50	16.45	5.00	17.38
GHG Mass	N/A	N/D	46,596.40	19,571.45	66,649.64
GHG CO _{2e}	N/A	43590	81,757.80	34,338.39	109,117.16
NMOC	50.0	N/R	N/D	5.07	17.41
TRS ^a	10.0	N/R	N/D	1.60	5.48
HAPs ^b	10.0/25.0	4.64	1.86	1.54	5.35
HCl	10.0	N/D	1.36	1.02	3.54

N/A = Not Applicable; N/D = Not Determined, N/R = Not Reported

^a Total reduced sulfur

^b Complete list of potential HAPs can be found in the calculations associated with the file1

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 emissions of all criteria pollutants for the project are below their respective *de minimis* levels.

APPLICABLE REQUIREMENTS

Lemons Sanitary Landfill 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. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Operating Permits*, 10 CSR 10-6.065
- *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.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.

- *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
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

SPECIFIC REQUIREMENTS

- *New Source Performance Regulations*, 10 CSR 10-6.070
 - *Standards of Performance for Municipal Solid Waste Landfills*, 40 CFR Part 60, Subpart WWW
 - *Standards of Performance for Municipal Solid Waste Landfills that Commenced Construction, Reconstruction, or Modification after July 17, 2014*, 40 CFR Part 60, Subpart XXX
- 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

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 July 3, 2019, received July 3, 2019, designating Lemons Sanitary Landfill as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

APPENDIX A

Abbreviations and Acronyms

% percent	Mgal 1,000 gallons
°F degrees Fahrenheit	MWmegawatt
acfm actual cubic feet per minute	MHDRmaximum hourly design rate
BACT Best Available Control Technology	MMBtuMillion British thermal units
BMPs Best Management Practices	MMCFmillion cubic feet
Btu British thermal unit	MSDSMaterial Safety Data Sheet
CAM Compliance Assurance Monitoring	NAAQSNational Ambient Air Quality Standards
CAS Chemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMS Continuous Emission Monitor System	NO_xnitrogen oxides
CFR Code of Federal Regulations	NSPSNew Source Performance Standards
CO carbon monoxide	NSRNew Source Review
CO₂ carbon dioxide	PMparticulate matter
CO_{2e} carbon dioxide equivalent	PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter
COMS Continuous Opacity Monitoring System	PM₁₀particulate matter less than 10 microns in aerodynamic diameter
CSR Code of State Regulations	ppmparts per million
dscf dry standard cubic feet	PSDPrevention of Significant Deterioration
EQ Emission Inventory Questionnaire	PTEpotential to emit
EP Emission Point	RACTReasonable Available Control Technology
EPA Environmental Protection Agency	RAL Risk Assessment Level
EU Emission Unit	SCCSource Classification Code
fps feet per second	scfmstandard cubic feet per minute
ft feet	SDS Safety Data Sheet
GACT Generally Available Control Technology	SICStandard Industrial Classification
GHG Greenhouse Gas	SIPState Implementation Plan
gpm gallons per minute	SMAL Screening Model Action Levels
gr grains	SO_xsulfur oxides
GWP Global Warming Potential	SO₂sulfur dioxide
HAP Hazardous Air Pollutant	SSM Startup, Shutdown & Malfunction
hr hour	tph tons per hour
hp horsepower	tpy tons per year
lb pound	VMT vehicle miles traveled
lbs/hr pounds per hour	VOC Volatile Organic Compound
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	