



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

December 21, 2020

Gary Freymiller  
Project Development Manager  
Roeslein Alternative Energy, LLC  
9200 Watson Road  
St. Louis, MO 63126

RE: New Source Review Permit - Project Number: 2020-11-006

Dear Gary Freymiller:

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 are 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



Gary Freymiller  
Page Two

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.oe.mo.gov/ahc](http://www.oe.mo.gov/ahc).

If you have any questions regarding this permit, please do not hesitate to contact Dakota Fox 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



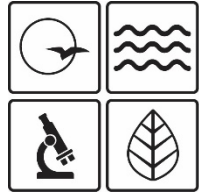
Susan Heckenkamp  
New Source Review Unit Chief

SH:dfa

Enclosures

c: Northeast Regional Office  
PAMS File: 2020-11-006

Permit Number: 122020-004



**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: 122020-004      Project Number: 2020-11-006  
Installation Number: 211-0027

Installation Name: Roeslein Alternative Energy of Missouri, LLC. - Green Hills Farm


Installation Address: 59559 Justice Road, Unionville, MO 63565

Location Information: Sullivan County, S02, T64N, R19W

Application for Authority to Construct was made for:

The installation of a new biogas collection system on nine existing lagoons. 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

\_\_\_\_\_  
December 21, 2020  
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."*

Roeslein Alternative Energy of Missouri, LLC. - Green Hills Farm  
Sullivan County, S02, T64N, R19W

1. Control Device Requirement – Thermal Oxidizer
  - A. Roeslein Alternative Energy of Missouri, LLC shall control emissions from the membrane upgrading system using a thermal oxidizer (EP-02), as specified in the permit application.
  - B. The thermal oxidizer must be in use at all times when the membrane upgrading system is operating and producing tail gas that is not being recycled back into a lagoon.
  - C. The thermal oxidizer shall be operated and maintained in accordance with the manufacturer's specifications, which shall be kept on site.
  - D. The operating temperature of the thermal oxidizer shall be continuously monitored and recorded during operation. The operating temperature shall be maintained at a minimum of 1,400 °F (averaged each minute).
  - E. Roeslein Alternative Energy of Missouri, LLC shall maintain an operating and maintenance log for the thermal oxidizer, which shall include the following:
    - 1) Incidents of malfunction with impact on emissions, date and duration of event, probable cause, and corrective actions
    - 2) Maintenance activities with inspection schedule, repair actions, replacements, etc.
2. Operational Requirement – Biogas Venting
  - A. Roeslein Alternative Energy of Missouri, LLC shall divert the biogas collected by the lagoon covers to the membrane upgrading system and the thermal oxidizer at all times. The biogas shall not be emitted directly into the atmosphere, except during periods of equipment maintenance or for safety considerations.
  - B. During periods of maintenance or malfunction, Roeslein Alternative Energy of Missouri, LLC shall not vent more than 85.68 MMscf of biogas in any consecutive 12-month period.
  - C. Roeslein Alternative Energy of Missouri, LLC shall demonstrate compliance with Special Condition 2.B by keeping a record of the amount

**SPECIAL CONDITIONS:**

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

of biogas emitted directly into the atmosphere. These records shall contain, at a minimum, the following information:

- 1) Installation name & ID number
- 2) Permit number
- 3) Date of biogas venting period (month, day, year)
- 4) Duration of biogas venting period (hours)
- 5) Method for calculating amount of biogas vented (biogas generation rate, total lagoon volume, etc.)
- 6) Reason for venting (upgrading system maintenance, lagoon cover rupture, etc.)
- 7) 12-month rolling total amount of biogas vented (MMscf)
- 8) Indication of compliance with Special Condition 2.B

**3. H<sub>2</sub>S Sampling Requirements**

- A. Roeslein Alternative Energy of Missouri, LLC shall sample the biogas to determine H<sub>2</sub>S concentration.
- B. Roeslein Alternative Energy of Missouri, LLC shall demonstrate compliance with Special Condition 3.A by installing a gas flow meter and sampling the H<sub>2</sub>S concentration of the biogas. The flow meter shall continuously measure the flow rate (scfm) of biogas being routed to the biogas upgrading system and shall have the ability to show total flow rate across a set time period. The biogas H<sub>2</sub>S concentration (ppmv) shall be sampled prior to the biogas upgrading system inlet at least once per calendar month, with no two tests occurring within 14 days of one another. No H<sub>2</sub>S sampling is required during the months of December through April, and the biogas flow rate during this time is assumed to be negligible.
- C. Sampling shall be performed using an approved EPA method or a method approved by the Air Pollution Control Program, including the use of a Landtec Biogas 5000 or equivalent unit. Roeslein Alternative Energy, LLC shall submit a testing protocol to the Air Pollution Control Program at least 14 days before the first test for approval. All subsequent tests shall be performed in accordance with the approved testing protocol.
- D. The measured flow rates and H<sub>2</sub>S concentrations shall be recorded in Attachments A and B, or an equivalent form, which will be used to calculate the variable SO<sub>x</sub> and H<sub>2</sub>S emission rates to indicate compliance with Special Conditions 4.A. and 5.A.
- E. Roeslein Alternative Energy of Missouri, LLC may petition the Air Pollution Control Program to reduce the H<sub>2</sub>S sampling frequency if at least one year of biogas sample collections have been performed and compliance has continually been demonstrated with Special Condition 2.B

**SPECIAL CONDITIONS:**

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

**4. SO<sub>x</sub> Emission Limitation**

- A. Roeslein Alternative Energy of Missouri, LLC shall emit less than 40.0 tons of SO<sub>x</sub> in any consecutive 12-month period from the permitted equipment.
- B. Roeslein Alternative Energy of Missouri, LLC shall demonstrate compliance with Special Condition 4.A using Attachment A or an equivalent form that uses the emission factors approved by the Air Pollution Control Program, and the concentration of H<sub>2</sub>S as required by Special Condition 3.D.
- C. If the 12-month rolling total for SO<sub>x</sub> emissions shows an exceedance of the limit in Special Condition 4.A, Roeslein Alternative Energy, LLC shall submit ambient impact modeling results to show that the potential SO<sub>x</sub> emissions do not exceed the NAAQS. Roeslein Alternative Energy, LLC shall also submit an emissions analysis to show that the potential SO<sub>x</sub> emissions do not exceed the major source level.
- D. If Roeslein Alternative Energy of Missouri, LLC cannot show compliance with Special Condition 4.A, they shall contact the Air Pollution Control Program for further instructions.

**5. H<sub>2</sub>S Emission Limitation**

- A. Roeslein Alternative Energy of Missouri, LLC shall emit less than 10.0 tons of H<sub>2</sub>S in any consecutive 12-month period from the permitted equipment.
- B. Roeslein Alternative Energy of Missouri, LLC shall demonstrate compliance with Special Condition 5.A using Attachment B or an equivalent form that uses the emission factors approved by the Air Pollution Control Program, and the concentration of H<sub>2</sub>S as required by Special Condition 3.D.
- C. If the 12-month rolling total for H<sub>2</sub>S emissions shows an exceedance of the limit in Special Condition 5.A, Roeslein Alternative Energy, LLC shall submit ambient impact modeling results to show that the potential H<sub>2</sub>S emissions do not exceed the MoAAQS. Roeslein Alternative Energy, LLC shall also submit an emissions analysis to show that the potential H<sub>2</sub>S emissions do not exceed the major source level.
- D. If Roeslein Alternative Energy, LLC cannot show compliance with Special Condition 5.A, they shall contact the Air Pollution Control Program for further instructions.

**SPECIAL CONDITIONS:**

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

6. Record Keeping and Reporting Requirements
  - A. Roeslein Alternative Energy of Missouri, LLC shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
  - B. Roeslein Alternative Energy of Missouri, LLC shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by e-mail at [AirComplainceReporting@dnr.mo.gov](mailto:AirComplainceReporting@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: 2020-11-006  
Installation ID Number: 211-0027  
Permit Number: 122020-004

Installation Address:

Roeslein Alternative Energy of Missouri,  
LLC. - Green Hills Farm  
59559 Justice Road  
Unionville, MO 63565

Sullivan County, S02, T64N, R19W

REVIEW SUMMARY

- Roeslein Alternative Energy of Missouri, LLC has applied for authority to install a new biogas collection system on nine lagoons.
- The application was deemed complete on November 11, 2020.
- HAP emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- A thermal oxidizer is being used to control the H<sub>2</sub>S, NH<sub>3</sub>, and VOC emissions from the tail gas.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of H<sub>2</sub>S are conditioned below de minimis levels through the operational requirements in Special Condition 3. Potential emissions of H<sub>2</sub>S and SO<sub>2</sub> are also conditioned to de minimis levels.
- This installation is located in Sullivan 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 since potential emissions of the application are below de minimis levels.

- H<sub>2</sub>S sampling is required as a part of this permit. Further 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/PROJECT DESCRIPTION

Roeslein Alternative Energy of Missouri of Missouri, LLC will be constructing a new biogas collection, cleaning, and compression system at Green Hills Farm in Unionville, Missouri, in order to convert and sell the biogas as a renewable energy. There exist nine waste lagoons that will be covered with impermeable geomembrane gas collection covers which provide an oxygen deficient environment to facilitate anaerobic digestion and produce biogas. Based on sampling, peak biogas production, and similar projects Roeslein Alternative Energy of Missouri, LLC has completed, the maximum annual biogas flow per lagoon is 18.79 MMscf.

The biogas from the lagoons will be collected in underground piping and sent to cleaning equipment where the methane will be separated out and compressed. Product gas passes over an H<sub>2</sub>S capture media to remove trace amounts of H<sub>2</sub>S from the product stream. The membrane technology separates unwanted CO<sub>2</sub>, H<sub>2</sub>S, O<sub>2</sub>, and H<sub>2</sub>O from the product CH<sub>4</sub> based on each compound's permeability through three stages of membranes. Nitrogen permeates at the same rate as CH<sub>4</sub>, therefore, N<sub>2</sub> entering with the biogas feed, ends up in the product gas.

Low quality gas (tail gas) will be sent to a thermal oxidizer to be destroyed or recycled back into the lagoons. A tail gas flare is used to control H<sub>2</sub>S emissions from the cleaning system, but the tail gas heating value cannot support a stable flame. Therefore, propane gas will need to be added at the burner to maintain a target temperature of 1400 °F. A fire-eye and thermocouples will confirm that a burner flame is present. A flame arrestor prevents flame migration backwards, upstream in the tail gas line. In the event of a thermal oxidizer (TOX) trip, tail gas will be automatically diverted to a covered recycle gas lagoon.

Additionally, this permit allows Roeslein Alternative Energy of Missouri, LLC to vent up to 9.52 MMscf of biogas per lagoon directly into the atmosphere due to maintenance or malfunction scenarios. This amount of biogas keeps H<sub>2</sub>S emissions below 9 tons per year, which is equal to 10 tons per year (the de minimis level for H<sub>2</sub>S) after taking into account a 10% safety factor.

Table 1: Emission Point Summary

Emission Point	Description	Maximum Design Rate
EP-01	Nine Lagoon Cover	169.02 MMscf/yr
EP-02a	Thermal Oxidizer (Tail Gas)	56.61 MMscf/yr
EP-02b	Thermal Oxidizer (Pilot Burner)	6 MMBtu/hr

No permits have been issued to Roeslein Alternative Energy of Missouri, LLC. - Green Hills Farm from the Air Pollution Control Program.

## EMISSIONS/CONTROLS EVALUATION

The following table provides an emissions summary for this project. Potential emissions of the application represent the potential of the new equipment assuming continuous operation (8760 hours per year). Conditioned Emissions of the Project account for a limit of 85.68 MMscf of biogas vented to the atmosphere during any consecutive 12-month period.

Table 2: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Potential Emissions of the Project	Conditioned Emissions of the Project
PM	25.0	0.22	0.22
PM <sub>10</sub>	15.0	0.22	0.22
PM <sub>2.5</sub>	10.0	0.22	0.22
SO <sub>x</sub>	40.0	29.80	29.80 <sup>a</sup>
NO <sub>x</sub>	40.0	6.65	6.65
VOC	40.0	0.32	0.32
CO	100.0	3.09	3.09
GHG (CO <sub>2</sub> e)	N/A	3,063.62	3,063.62
GHG (mass)	N/A	2,996.58	2,996.58
H <sub>2</sub> S	10.0	17.77	9.00
HAPs	10.0/25.0	N/A	N/A

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

<sup>a</sup>The SO<sub>x</sub> emissions are based on the expected max H<sub>2</sub>S concentration of 0.23% by volume. However, since this maximum concentration is not certain at this time, Whitetail has chosen to ensure to limit SO<sub>2</sub> emissions in tail gas to 40 tpy in the event that their assumption is not correct.

The emission factors used in this analysis were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, vendor information, and sampling data.

### Emissions from Lagoon Cover Leaks

- Emission factors for CH<sub>4</sub>, CO<sub>2</sub>, H<sub>2</sub>S, and NH<sub>3</sub> were derived from sampling courtesy of Roselein Alternative Energy of Missouri, LLC. H<sub>2</sub>S was assumed to have a maximum average concentration of 0.23% by volume.
- Biogas leakage into the atmosphere was estimated to be 2% based on previous, similar facilities.

#### Emissions from the Thermal Oxidizer

- CO, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emission factors were derived from AP-42 Chapter 2.4 *Municipal Solid Waste Landfills* (October 2008) Table 2.4-5. All PM was conservatively assumed to be PM<sub>10</sub> and PM<sub>2.5</sub>.
- CO<sub>2</sub> emissions from combustion were derived from AP-42 Chapter 1.4 *Natural Gas Combustion* (July 1998) Table 1.4-2.
- CH<sub>4</sub>, CO<sub>2</sub> (from the Biogas), H<sub>2</sub>S, NH<sub>3</sub>, SO<sub>x</sub>, and NO<sub>x</sub> emissions were determined via a mass balance. NO<sub>x</sub> emissions, specifically those contributed from combustion, were also calculated using vendor information.
- All emissions attributed to the propane pilot burner were derived from AP-42 Chapter 1.5 *Liquefied Petroleum Gas Combustion* (July 2008) Table 1.5-1.

#### 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 sulfur dioxide and hydrogen sulfide are conditioned to de minimis levels.

#### APPLICABLE REQUIREMENTS

The permittee 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.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

- *No New Source Performance Regulations (NSPS), MACT regulations, or Emission Standards for Hazardous Air Pollutants (NESHAP)* apply to the permitted equipment
- *Control of Sulfur Dioxide Emissions*, 10 CSR 10-6.261

## 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 October 27, 2020, received October 27, 2020, designating Roeslein Alternative Energy of Missouri, LLC. - Green Hills Farm as the owner and operator of the installation.





## 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>EIQ</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	