



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: 07 2 0 1 0 - 0 0 2 Project Number: 2010-02-036
Installation Number: 019-0108

Parent Company: Gates Corporation

Parent Company Address: 1551 Wewatta Street, Denver, CO 80202

Installation Name: Gates Corporation

Installation Address: 3015 Lemone Industrial Blvd., Columbia, MO 65201

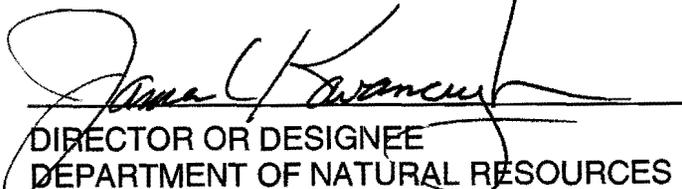
Location Information: Boone County, S20, T48N, R12W

Application for Authority to Construct was made for:
Construction of a new fabric treating process. 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.

JUL - 7 2010

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

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 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 Departments' 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 of Natural Resources 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 this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' 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 at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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| Page No. | 3 |
| Permit No. | |
| Project No. | 2010-02-036 |

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 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 (12)(A)10. "Conditions required by permitting authority."

Gates Corporation
Boone County, S20, T48N, R12W

1. **Superseding Condition**
The conditions of this permit supersede special condition 2.A found in the previously issued construction permit 102006-016 issued by the Air Pollution Control Program.
2. **Emission Limitation**
 - A. Gates Corporation shall emit less than 10.0 tons individually or 25.0 tons combined of Hazardous Air Pollutants (HAPs) in any consecutive 12-month period from the entire installation. The entire installation encompasses all the equipment at the site as of the date this permit is issued.
 - B. Attachment A, Attachment B and Attachment C or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 2.A
3. **Control Device Requirement-Thermal Oxidizer**
 - A. Gates Corporation shall control emissions from the fabric treater (EP-25) using a thermal oxidizer as specified in the permit application.
 - B. The thermal oxidizer shall remove volatile organic compounds (VOC) from the exhaust gas with 99% efficiency.
 - C. The thermal oxidizer shall be operated and maintained in accordance with the manufacturer's specifications. The thermal oxidizer shall be equipped with a monitoring device that continuously indicates and records the combustion temperature of the incinerator. The monitoring device shall have accuracy within ± 1 percent of the temperature being measured in Celsius degrees as specified by the manufacturer. These gauges or meters shall be located such that the Department of Natural Resources employees may easily observe them.

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|-------------|-------------|
| Page No. | 4 |
| Permit No. | |
| Project No. | 2010-02-036 |

SPECIAL CONDITIONS:

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

- D. Gates Corporation shall maintain an operating and maintenance log for the thermal oxidizer 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.

- 4. Operational Requirement
Gates Corporation shall keep the solvents in sealed containers whenever the materials are not in use. Gates Corporation shall provide and maintain suitable, easily read, permanent markings on all solvent containers used with this equipment.

- 5. Initial Compliance Testing
 - A. Gates Corporation shall demonstrate compliance with special condition 3.B through performance testing.

 - B. These tests shall be performed not later than 60 days after achieving the maximum production rate at which the affected facility will be operated or 180 days after initial startup, whichever date comes first.

 - C. A completed Proposed Test Plan Form (enclosed) must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program 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 must be approved by the Director prior to conducting the required emission testing.

 - D. Two (2) copies of a written report of the performance test results shall be submitted to the Director within 30 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 (1) sample run.

 - E. The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations

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| Page No. | 5 |
| Permit No. | |
| Project No. | 2010-02-036 |

SPECIAL CONDITIONS:

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

6. Record Keeping and Reporting Requirements
 - A. Gates Corporation shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used
 - B. Gates Corporation shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit show an exceedance of a limitation imposed by this permit.

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

Project Number: 2010-02-036
Installation ID Number: 019-0108
Permit Number:

Gates Corporation
3015 Lemone Industrial Blvd.
Columbia, MO 65201

Complete: February 10, 2010

Parent Company:
Gates Corporation
1551 Wewatta Street
Denver, CO 80202

Boone County, S20, T48N, R12W

REVIEW SUMMARY

- Gates Corporation has applied for authority to construct a new fabric treating process.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are toluene.
- 40 CFR 60 Subpart VVV, "Standards of Performance for Polymeric Coating of Supporting Substrates Facilities" applies to the equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) apply to this installation. None of the currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- A thermal oxidizer is being used to control the volatile organic compounds (VOC) emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of HAPs are conditioned below de minimis levels.
- This installation is located in Boone County, an attainment 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.
- Emissions testing are required for the new thermal oxidizer.
- A Basic Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Gates Corporation Columbia Missouri plant operates a coating process that produces coated cords and rubber slabs. These coated cords and slabs are shipped off-site for incorporation into other products such as automotive belts and hoses. The installation's existing potential emissions of HAPs and VOC are conditioned to de minimis levels.

The following permits have been issued to Gates Corporation from the Air Pollution Control Program.

Table 1: Permit History

| Permit Number | Description |
|---------------|--|
| 0188-066 | Parker Hannifin Company for nordale fluid eliminator |
| 032002-003 | Cord Treating and Rubber Mixing |
| 092002-005 | Add Rubber Mixers |
| 032003-031 | Powered Rubber Handling System |
| 102006-016 | Amend for as-built |

Permit 0188-066 was issued to a company previously located at this location that is not affiliated with Gates Corporation.

PROJECT DESCRIPTION

Gates Corporation is constructing a new manufacturing process that will produce dipped or coated fabrics, which are shipped off-site for incorporation into other products such as automotive belts. The fabric treating process (EP-25) will apply a single dip per application using one of two applicator assemblies, dip and squeeze or overcoat. Coatings are applied at a rate of approximately 20-25 gallons per hour depending on the coating. Products may require multiple dip applications to complete treatment of the fabric. The fabric treater contains both drying and curing ovens and is controlled by a new 38.65 MMBtu/hr thermal oxidizer, which is 99% efficient. This efficiency will be verified through testing.

The process uses either a water-based latex or a solvent-based adhesive dip at the dip and squeeze applicator. The overcoat applicator applies a solvent-based cement overcoat. These applicators are contained in an enclosure that is vented to the thermal oxidizer. After the dip applicators, the material passes through a series of ovens, which have a combined heating capacity of 21.9 MMBtu/hr, to dry and cure the dip that was just applied to the fabric. At the end of the ovens, the fabric is cooled and wound into a roll. The fabric roll will then be taken back to the start of the fabric treating process to have additional coatings applied. Fabric will typically be processed through the fabric

treater multiple times.

To support the fabric treating process, two existing aramid storage tanks will be converted to latex storage tanks. Two additional cement mixers (EP-1) and an additional bulk solvent storage tank (EP-26), which will hold methyl ethyl ketone (MEK), will be installed to support the fabric treater. Four additional cement transfer totes will be purchased to transport cement from the mixing room to the fabric treater. A custom built maintenance parts washer (EP-27) and a rubber chopper (EP-28) will be installed. The parts washer is a cold cleaner with that uses Stoddard solvent (CAS# 8052-41-3). The rubber chopper is capable of processing 300 tons of rubber per hour. No emissions are expected from the chopping process. However, to keep the rubber from sticking together talc powder is applied to the rubber. Some of the talc will be emitted as particulate matter, so for emission estimate purposes, all of the talc is assumed to be emitted as PM₁₀. The talc from the rubber chopper is controlled by a dust collector with an 80% overall control efficiency.

EMISSIONS/CONTROLS EVALUATION

Emissions from the applicators and mixing room were calculated using a mass balance approach based on the worst case coating. Gates Corporation provided material safety data sheets (MSDS) for all of the coatings used. These MSDS are being held in confidential file 2010-02-037 as requested by the company. HAPs emitted from the fabric treater are cumene, ethylbenzene, formaldehyde, and toluene. Emissions from MEK tank were calculated using the Environmental Protection Agency (EPA) software Tanks 4.0.9d. Emissions from the thermal oxidizer and ovens were calculated using emission factors from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.4, "Natural Gas Combustion," July 1998. Emissions from the parts washer were calculated using the emission factor for cold cleaners in AP-42 Section 4.6, "Solvent Degreasing," April 1981. Emissions from the rubber chopper were calculated using a mass balance approach and considering all the talc is emitted as PM₁₀. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Existing potential emissions were taken from permit 102006-016. The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tons per year)

| Pollutant | Regulatory De Minimis Levels | Existing Potential Emissions | Existing Actual Emissions (2008 EIQ) | Potential Emissions of the Application | New Installation Conditioned Potential |
|------------------|------------------------------|------------------------------|--------------------------------------|--|--|
| PM ₁₀ | 15.0 | < 15.0 | 2.73 | 2.76 | 17.76 |
| SO _x | 40.0 | < 1 | 0.03 | 0.02 | N/A |
| NO _x | 40.0 | < 40.0 | 5.25 | 3.03 | N/A |
| VOC | 40.0 | < 40.0 | 12.76 | 11.35 | 41.35 |
| CO | 100.0 | < 100.0 | 4.41 | 2.54 | N/A |
| HAPs | 10.0/25.0 | < 10.0/25.0 | 0.04 | 8.98 | < 10.0/25.0 |
| Formaldehyde | 10.0 | < 10.0 | N/D | 1.50 | < 10.0 |
| MDI | 10.0 | < 10.0 | N/D | N/A | < 10.0 |
| Styrene | 10.0 | < 10.0 | N/D | N/A | < 10.0 |

| | | | | | |
|---------|------|--------|-----|------|--------|
| Toluene | 10.0 | < 10.0 | N/D | 6.56 | < 10.0 |
|---------|------|--------|-----|------|--------|

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 emissions of HAPs are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

Gates Corporation 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

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
- *Operating Permits, 10 CSR 10-6.065*
- *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 10-3.090*

SPECIFIC REQUIREMENTS

- *New Source Performance Regulations, 10 CSR 10-6.070 – New Source Performance Standards (NSPS) for Polymeric Coating of Supporting Substrates Facilities, 40 CFR Part 60, Subpart VVV*

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*, I recommend this permit be granted with special conditions.

Michael Mittermeyer
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated February 8, 2010, received February 10, 2010, designating Gates Corporation as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Northeast Regional Office Site Survey, dated February 17, 2010.

Attachment A – Emissions Calculations from Coatings

The Gates Corporation

Boone County, NE 1/4 of S 29 & SE 1/4 of S 20, T 48N, R12W

Project Number: 2010-02-036

Installation ID Number: 019-0108

Permit Number:

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

| Column A | Column B | Column C | Column D | Column E | Column F | Column G | Column H | Column I | Column J | Column K |
|---|-----------------------|----------|-----------|----------|-----------------------------------|--|---|----------------------|--------------------------|----------------------|
| Water Based Coatings (Note 1) | | | | | | | | | | |
| Formula | Amount Mixed (pounds) | % HAP | % Toluene | % VOC | % Emitted during Mixing Operation | % Emitted During Cord Treating Process | Control Efficiency on Cord Treating Process | HAP Emissions (tons) | Toluene Emissions (tons) | VOC Emissions (tons) |
| (Note 2) | | | | | (Note 3) | (Note 3) | (Note 4) | (Note 5) | (Note 6) | (Note 7) |
| | | | | | | | | | | |
| | | | | | | | | | | |
| Total Emissions from Water Based Coatings (Note 8) | | | | | | | | | | |
| Solvent Based Coatings (Note 9) | | | | | | | | | | |
| Formula | Amount Mixed (pounds) | % HAP | % Toluene | % VOC | | | Control Efficiency | HAP Emissions (tons) | Toluene Emissions (tons) | VOC Emissions (tons) |
| (Note 2) | | | | | | | (Note 10) | (Note 11) | (Note 12) | (Note 13) |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| Total Emissions from Solvent Based Coatings (Note 14) | | | | | | | | | | |
| Total Emissions from Coatings (Note 15) | | | | | | | | | | |

Notes for Attachment A – Emissions Calculations from Coatings

Note 1: Emissions from the water based coating itself will occur in the water based mixing operation (EP-02) and the cord treating processes (EP-03).

Note 2: A distinctive number (as used in the permit application) may be used to identify each formula. A separate document needs to be maintained that identifies each HAP, the weight percent of each HAP, and the VOC content for each formula.

Note 3: It was estimated that 10 percent (%) of the HAP, toluene, and VOCs are emitted during the mixing process (EP-02) for the water based coatings. The remaining 90 percent (%) is assumed to be emitted during the cord treating processes (EP-03).

Note 4: Control efficiency for the thermal oxidizers on the cord treaters (EP-03) is 99 percent (%) for volatile HAPs, including toluene, and for VOCs. There is no control device on the water-based coatings mixing process (EP-02).

$$\text{Note 5: } \left(\text{Column B} \right) \left(\frac{\text{Column C}}{100} \right) (0.0005) \left[\left(\frac{\text{Column F}}{100} \right) + \left(\frac{\text{Column G}}{100} \right) \left(1 - \frac{\text{Column H}}{100} \right) \right]$$

$$\text{Note 6: } \left(\text{Column B} \right) \left(\frac{\text{Column D}}{100} \right) (0.0005) \left[\left(\frac{\text{Column F}}{100} \right) + \left(\frac{\text{Column G}}{100} \right) \left(1 - \frac{\text{Column H}}{100} \right) \right]$$

$$\text{Note 7: } \left(\text{Column B} \right) \left(\frac{\text{Column E}}{100} \right) (0.0005) \left[\left(\frac{\text{Column F}}{100} \right) + \left(\frac{\text{Column G}}{100} \right) \left(1 - \frac{\text{Column H}}{100} \right) \right]$$

Note 8: Sum of HAP, toluene, and VOC emissions for the water based coatings.

Note 9: Emissions from the solvent based coating itself will occur in the solvent based mixing operation (EP-01) and the cord treating processes (EP-03).

Note 10: Control efficiency for the thermal oxidizers on the solvent based mixing operation (EP-01) and the cord treaters (EP-03) is 99 percent (%) for volatile HAPs, including toluene, and for VOCs.

$$\text{Note 11: } \left(\text{Column B} \right) \left(\frac{\text{Column C}}{100} \right) \left(1 - \frac{\text{Column H}}{100} \right) (0.0005)$$

$$\text{Note 12: } \left(\text{Column B} \right) \left(\frac{\text{Column D}}{100} \right) \left(1 - \frac{\text{Column H}}{100} \right) (0.0005)$$

$$\text{Note 13: } \left(\text{Column B} \right) \left(\frac{\text{Column E}}{100} \right) \left(1 - \frac{\text{Column H}}{100} \right) (0.0005)$$

Note 14: Sum of the HAP, toluene, and VOC emissions for the solvent based coatings.

Note 15: Sum of the water based coating emissions (Note 8) and the solvent based coating emissions (Note 14).

Attachment C - Toluene Compliance Worksheet

The Gates Corporation
 Boone County, NE 1/4 of S 29 & SE 1/4 of S 20, T 48N, R12W
 Project Number: 2010-02-036
 Installation ID Number: 019-0108
 Permit Number:

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

| | Column A | Column B | Column C | Column D | Column E |
|--|--|-------------------------|-------------------------|----------|-------------------|
| Toluene Emissions from Storage Tanks | | | | | |
| | Emission Point | Throughput | Toluene Emission Factor | | Toluene Emissions |
| | (EP08) | (1000 gallons) (Note 1) | (lb/1000 gallon) | | (tons) (Note 2) |
| | 8000 – Gal Working Loss | | | | |
| | 1000-Gal Working Loss | | | | |
| | Breathing Loss (Total) | | | | 0.03 |
| | Total Toluene Emissions from the Storage Tanks (Note 3) | | | | |
| Toluene Emissions From Banbury Mixers | | | | | |
| | Emission Point | Amount of Rubber Mixed | Toluene Emission Factor | | Toluene Emissions |
| | (EP06) | (tons) | (lb/ton) (Note 4) | | (tons) (Note 2) |
| | Line #1 | | | | |
| | Line #2 | | | | |
| | Line #3 | | | | |
| | Line #4 | | | | |
| | R&D | | | | |
| | Total Toluene Emissions from the Banbury Mixers (Note 5) | | | | |
| Toluene Emissions from Mixing Process and Cord Treaters (EP-01, EP-02, EP-03) (Note 6) | | | | | |
| Toluene Emissions from the Combustion of Natural Gas (Note 7) | | | | | 0.0 |
| Total Toluene Emissions from the Installation for this Month (Note 8) | | | | | |
| 12-Month Toluene Emissions Total from the Previous Month's Worksheet (Note 9) | | | | | |
| Monthly Toluene Emissions Total from Previous Year's Worksheet (Note 10) | | | | | |
| Current 12-Month Total Toluene Emissions (Note 11) | | | | | |

Notes for Attachments B, and C

- Note 1: Total amount of liquid stored in the tank during the month.
- Note 2: $\text{Column E} = (\text{Column B})(\text{Column C})(0.0005)$
- Note 3: Sum of the emissions from the storage tanks.
- Note 4: Emission factors used in the permit application may be used here.
- Note 5: Sum of the emissions from the banbury mixers.
- Note 6: The emissions from the mixing operations (EP-01 and EP-02) and the cord treaters (EP-03) can be taken from *Attachment A – Emissions Calculations from Coatings*, Note 15.
- Note 7: Emissions due to the combustion of natural gas (EP-11) in then the thermal oxidizer of EP-01, the thermal oxidizers and ovens of EP-03, the boiler and miscellaneous heating units.
- Note 8: Sum of the emissions from the storage tanks, banbury mixers, mixing operations, cord treaters, and the combustion of natural gas. (i.e. Note 3 + Note 5 + Note 6 + Note 7).
- Note 9: Running 12-month total of emissions from previous month's worksheet.
- Note 10: Emissions reported for this month in the last calendar year.
- Note 11: Amount reported for Note 9 minus amount reported for Note 10 plus amount reported for Note 8.

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