



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

APR 03 2020

Dan Fetherston
Vice President
Tiger Soy LLC
651 Commerce Road
Mexico, Missouri 65265

RE: New Source Review Permit - Project Number: 2019-08-013

Dear Dan Fetherston:

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 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.

Dan Fetherston
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If you have any questions regarding this permit, please do not hesitate to contact Jonathan Halla, 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



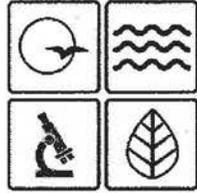
Susan Heckenkamp
New Source Review Unit Chief

SH:hja

Enclosures

c: Northeast Regional Office
PAMS File: 2019-08-013

Permit Number: **042020-002**



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 - 002

Project Number: 2019-08-013
Installation Number: 007-0066

Parent Company: SEMO Milling LLC

Parent Company Address: 261 River Road, Scott City, Missouri 63780

Installation Name: Tiger Soy LLC

Installation Address: 651 Commerce Road, Mexico, Missouri 65265

Location Information: Audrain County, S12, T50N, R9W

Application for Authority to Construct was made for:
Permitting new and existing equipment for a soybean processing operation in Mexico, Missouri. 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."

Tiger Soy LLC
Audrain County, S12, T50N, R9W

1. Control Device Requirement – Baghouse/Bin Vent Filter
 - A. Tiger Soy LLC shall control emissions listed in Table 1 using baghouses and bin vent filters as specified in the permit application.

Table 1: Emission Units Controlled by Baghouse/Bin Vent Filter

| Control Device Name/Number | Emission Unit Number | Emission Unit Description |
|-------------------------------------|----------------------|---------------------------|
| Outside Baghouse (CD-1) | EU-003 | Conveying |
| Filter 505 Interior Baghouse (CD-2) | EU-004 | Cracking/Dehulling |
| Filter 505 Interior Baghouse (CD-2) | EU-005 | Hull Grinding |
| Filter 505 Interior Baghouse (CD-2) | EU-006 | Extrusion/Conditioning |
| Hosokawa Baghouse (CD-3) | EU-007 | Meal Grinding |
| Filter 505 Interior Baghouse (CD-2) | EU-008 | Meal Grinding |
| Filter 505 Interior Baghouse (CD-2) | EU-009 | Meal Handling |
| Bin Vent Filter (CD-4) | EU-010 | Meal Loadout |

- B. The baghouses/bin vent filters shall be operated and maintained in accordance with the manufacturer's specifications.
 - C. The baghouses/bin vent filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.
 - D. Replacement filters for the baghouses/bin vent filters shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - E. Tiger Soy LLC shall monitor and record the operating pressure drop across the baghouses/bin vent filters at least once every 24 hours while the equipment is operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.

SPECIAL CONDITIONS:

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

- F. Tiger Soy LLC shall maintain a copy of the baghouse/bin vent filter manufacturer's performance warranty on site.
 - G. Tiger Soy LLC shall maintain an operating and maintenance log for the baghouses/bin vent filters 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. Control Device Requirement – Cyclones
- A. Tiger Soy LLC shall control emissions from the processes/equipment listed below using cyclones vented to baghouses as specified in the permit application.
 - 1) Cracking/Dehulling (EU-004)
 - 2) Hull Grinding (EU-005)
 - 3) Extrusion/Conditioning (EU-006)
 - 4) Meal Grinding (EU-007)
 - 5) Meal Grinding (EU-008)
 - B. Tiger Soy LLC shall operate and maintain the cyclones in accordance with the manufacturer's specifications.
 - C. Tiger Soy LLC shall maintain onsite a copy of the manufacturer's specifications for each cyclone.
 - D. Tiger Soy LLC shall maintain an operating and maintenance log for the cyclones 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.
3. Capture Requirement – Enclosure
- A. All equipment listed in Table 1 with controls such as a cyclone to baghouse, cyclone, baghouse, or bin vent shall be completely enclosed.
 - B. Tiger Soy LLC personnel shall inspect any enclosures listed in Table 1 on a quarterly basis for any signs of leaks. The results of the inspection shall be recorded along with documentation regarding any necessary corrective action.

SPECIAL CONDITIONS:

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

4. Record Keeping and Reporting Requirements
 - A. Tiger Soy 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. These records shall include SDS for all materials used.
 - B. Tiger Soy 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 email at 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: 2019-08-013
Installation ID Number: 007-0066
Permit Number:

Installation Address:
Tiger Soy LLC
651 Commerce Road
Mexico, Missouri 65265

Parent Company:
SEMO Milling LLC
261 River Road
Scott City, Missouri 63780

Audrain County, S12, T50N, R9W

REVIEW SUMMARY

- Tiger Soy LLC has applied for authority to permit new and existing equipment for a soy bean processing operation in Mexico, Missouri.
- The application was deemed complete on August 9, 2019.
- HAP emissions are expected from the emergency generator. HAPs will be emitted from the combustion of diesel fuel but emissions will be less than the respective SMAL and de minimis level.
- 40 CFR 60 Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, applies to the emergency generator (EU-4).
- 40 CFR 60 Subpart DD, *Grain Elevators*, does not apply as the maximum storage capacity for the two silos is 10,000 bushels each, which is less than the 1 million bushel applicability level stated in the rule.
- 40 CFR 63 Subpart ZZZZ, *National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, applies to the emergency generator (EU-4).
- Baghouses and cyclones are being used to control the PM, PM₁₀, and PM_{2.5} emissions from the processes and equipment listed in Special Conditions 1 and 2.
- 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 pollutants are below de minimis levels.
- This installation is located in Audrain 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.
- 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 due to the PTE of the criteria pollutants being under 100 tpy and the HAPs being under 10/25 tpy.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Tiger Soy LLC is a soybean processing facility in Mexico, Missouri. The installation was previously identified as the Missouri Plant Science Center. Some of the existing equipment will be used by Tiger Soy as well as new equipment brought in. None of the existing equipment was permitted before Tiger Soy acquired the installation.

Soybeans will be received and conveyed through cleaning, dehulling, extrusion, conditioning, and milling operations before being stored and shipped offsite. The target products of the soybeans are food grade flour and oil. The by-product are the hulls that are removed from the soybeans and will be ground and stored before being shipped offsite for animal feed. The soybean handling emission sources vent to a baghouse except for the truck receiving and hull shipping operations.

No permits have been issued to Tiger Soy LLC from the Air Pollution Control Program. No permits were issued to Missouri Plant Science Center either, which was previously located at the installation.

Without the controls of the baghouses and cyclones, the PTE is over de minimis levels and thus requiring a Section 5 permit. However, the PTE of the controlled emissions is less than de minimis for all pollutants. No operating permit is required for this installation.

PROJECT DESCRIPTION

All the equipment, existing and new, will be part of this permit due to the installation never receiving a permit before it was acquired by Tiger Soy. The new and the existing equipment will not receive separate permits because it will not affect the permit type.

The processing operation is comprised of a truck receiving unit, conveyers, storage bins, hoppers, mills, cyclones, and truck load out units. This project also includes a 2010, 200 kW, diesel-fired emergency generator and haul roads. Citric acid will be

used as a degumming agent in the oil production process but has no VOC or HAP emissions associated with it.

The whole project is bottlenecked at a maximum hourly design rate, MHDR, of 2.5 tons/hour. That is the maximum the soybean processing line is designed to handle. Thus the receiving and shipping is limited to the 2.5 tons/hour as well. The maximum rate of receiving the soybeans could be 180 tons/hour and 3 tons/hour for the shipping.

The soybean receiving has no associated control devices. All the soybean processing is being controlled besides the storage bins, which are being vented to the atmosphere. The rest of the processing is being filtered through baghouses. Tiger Soy LLC ensures all processes being controlled by the baghouses have no open emission points.

Table 2 provides a list of all the emission units associated with this project and includes the bottlenecked MHDR.

Table 2: Emission Unit List

| Emission Unit Number | Description | Bottlenecked MHDR |
|----------------------|----------------------------|-------------------|
| EU-001 | Soybean Receiving | 2.5 tons/hour |
| EU-002 | Storage Bin (vent) | 2.5 tons/hour |
| EU-003 | Conveying | 2.5 tons/hour |
| EU-004 | Cracking/Dehulling | 2.5 tons/hour |
| EU-005 | Hull Grinding | 2.5 tons/hour |
| EU-006 | Extrusion/Conditioning | 2.5 tons/hour |
| EU-007 | Meal Grinding | 2.5 tons/hour |
| EU-008 | Meal Grinding | 2.5 tons/hour |
| EU-009 | Meal Handling | 2.5 tons/hour |
| EU-010 | Meal Loadout | 2.5 tons/hour |
| EU-011 | Hull Loadout | 2.5 tons/hour |
| EU-012 | Haul Roads | 5 tons/hour |
| EU-013 | 200 KW Emergency Generator | 0.68 MMBtu/hr |

EMISSIONS/CONTROLS EVALUATION

The emission factors used to determine the soybean processing potential emissions, except for EU-2a, were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 9.11.1, *Vegetable Oil Processing* (November 1995). Cyclone controlled emission factors were used for the sources required to operate cyclones by Special Condition 2. The particle size distributions were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Appendix B.2, *Grain Handling*, Category 6 and 7 (September 1996).

The emission factors used to determine the storage bin (EU-2a) potential emissions were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 9.9.1, *Grain Elevators & Processes* (May 2003).

Soybean processes (EP-2b – EP-2i) were given a control efficiency of 99% by having the PM emissions filtered through baghouses. The soybean receiving (EP-1), storage bin (EP-2a), and hull loadout (EP-2j) were the only processes that had no controls.

The emission factors used to determine the potential emission from haul roads and vehicular activity were obtained from EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 13.2.2, *Unpaved Roads* (November 2006) and Section 13.2.1, *Paved Roads* (January 2011). No controls will be used for the unpaved roads.

The emission factors used to determine the potential emissions for all PM, NO_x, and SO_x from the 2010 diesel-fired emergency generator were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 3.3, *Gasoline and Diesel Industrial Engines* (October 1996). The emission factors for CO and VOC were obtained from the EPA *Nonroad Compression-Ignition Engines: Exhaust Emission Standards*, (March 2016) under the Tier 3 category. The PTE calculations for the emergency generator were based off of 500 hours per year instead of 8760 hours per year.

The following table provides an emissions summary for this project. Existing potential emissions and existing actual emissions have yet to be determined since this is the first permit for the installation. Uncontrolled potential emissions of the project represent the potential of the new equipment with no controls, assuming continuous operation (8760 hours per year). Controlled potential emissions of the project represent the potential of the new equipment with controls, assuming continuous operation (8760 hours per year). This is to show that without controls the PTE was over de minimis levels and thus required a permit.

Table 3: Emissions Summary (tpy)

| Pollutant | Regulatory <i>De Minimis</i> Levels | Existing Potential Emissions | Existing Actual Emissions (2018 EIQ) | Uncontrolled Potential Emissions of the Project | Controlled Potential Emissions of the Project |
|-------------------|-------------------------------------|------------------------------|--------------------------------------|---|---|
| PM | 25.0 | N/A | N/A | 28.266 | 3.008 |
| PM ₁₀ | 15.0 | N/A | N/A | 14.802 | 0.740 |
| PM _{2.5} | 10.0 | N/A | N/A | 5.324 | 0.158 |
| SO _x | 40.0 | N/A | N/A | 0.050 | 0.050 |
| NO _x | 40.0 | N/A | N/A | 0.753 | 0.753 |
| VOC | 40.0 | N/A | N/A | 0.440 | 0.440 |
| CO | 100.0 | N/A | N/A | 0.385 | 0.385 |
| HAPs | 10.0/25.0 | N/A | N/A | 0.001 | 0.001 |

N/A = Not Applicable

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 pollutants are below de minimis levels.

APPLICABLE REQUIREMENTS

Tiger Soy LLC 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

- *New Source Performance Regulations*, 10 CSR 10-6.070
 - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, 40 CFR Part 60, Subpart IIII
- *MACT Regulations*, 10 CSR 10-6.075
 - *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 CFR Part 63, Subpart ZZZZ
- *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 August 9, 2019, received August 9, 2019, designating SEMO Milling LLC as the owner and operator of the installation.
- Safety Data Sheets

APPENDIX A

Abbreviations and Acronyms

| | |
|--|---|
| % percent | Mgal 1,000 gallons |
| °F degrees Fahrenheit | MW megawatt |
| acfm actual cubic feet per minute | MHDR maximum hourly design rate |
| BACT Best Available Control Technology | MMBtu Million British thermal units |
| BMPs Best Management Practices | MMCF million cubic feet |
| Btu British thermal unit | MSDS Material Safety Data Sheet |
| CAM Compliance Assurance Monitoring | NAAQS National 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 | NSPS New Source Performance Standards |
| CO carbon monoxide | NSR New 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 | PSD Prevention of Significant Deterioration |
| EQ Emission Inventory Questionnaire | PTEpotential to emit |
| EP Emission Point | RACT Reasonable Available Control Technology |
| EPA Environmental Protection Agency | RAL Risk Assessment Level |
| EU Emission Unit | SCC Source Classification Code |
| fps feet per second | scfm standard cubic feet per minute |
| ft feet | SDS Safety Data Sheet |
| GACT Generally Available Control Technology | SIC Standard Industrial Classification |
| GHG Greenhouse Gas | SIP State Implementation Plan |
| gpm gallons per minute | SMAL Screening Model Action Levels |
| gr grains | SO_x sulfur oxides |
| GWP Global Warming Potential | SO₂ sulfur 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 | |