TECHNICAL REVIEW AND EVALUATION OF APPLICATION FOR AIR QUALITY PERMIT NUMBER 45451 Fuel Processing Operators, LLC

I. INTRODUCTION

This Class II renewal permit for Operating Permit No. 1001656 (as revised by Significant Permit Revision No. 35984) is issued to Fuel Processing Operators, LLC, the Permittee, for continued operation of the transmix processing facility located at El Mirage in Maricopa County, Arizona.

A. Company Information

Facility Name:	Fuel Processing Operators, LLC
Mailing Address:	12126 W. Olive Avenue El Mirage, Arizona 85335
Facility Address:	12126 W. Olive Avenue El Mirage, Arizona 85335

B. Attainment Classification

The facility is located in a non-attainment area for particulate matter less than 10 microns (PM_{10}) and ozone.

C. Learning Sites Evaluation

In accordance with ADEQ's "Environmental Permits and Approvals Near Learning Sites" Policy, the Department is required to evaluate if any nearby learning sites would be adversely impacted by the facility. Learning sites consist of all existing public schools, charter schools and private schools at the K-12 level, and all planned sites for schools approved by the Arizona School Facilities Board. The learning sites policy was established to ensure that the protection of children at learning sites is considered before a permit approval is issued by ADEQ.

The Department identified 4 learning sites within two miles of the facility. Thus, the facility was required to perform a comprehensive dispersion modeling analysis to evaluate impact on the learning sites, and to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) and the Arizona Ambient Air Quality Guidelines (AAAQGs).

A dispersion modeling analysis was conducted by the Permittee to demonstrate compliance with the NAAQS and the AAAQGs. The modeling analysis design, input parameters, and results were documented in the modeling analysis submitted on June 24, 2009. The results of the modeling analysis are summarized in the Tables 1 and 2 below:

Table 1: Summary of Maximum Modeled Concentrations and NAAQS Compliance

Pollutant	Averaging Period	Modeled Conc. ($\mu g/m^3$)	Background Conc. ($\mu g/m^3$)	Total Impact ($\mu g/m^3$)	NAAQS ($\mu g/m^3$)
NO_X	Annual	2.29	44.90	47.19	100
SO_2	3-hour	0.25	55	55.25	1,300
	24-hour	0.094	24	24.1	365
	Annual	0.014	7	7.01	80
CO	1-hour	42	2400	2442	40,000
	8-hour	25	1444	1469	10,000
PM_{10}	24-hour	1.18	79.0	80.18	150
	Annual	0.18	29.43	29.61	50

Table 2: Summary of AAAQG Modeling Results

AAAQG Pollutant	1-Hour Impact ($\mu g/m^3$)	1-Hour AAAQG ($\mu g/m^3$)	24-Hour Impact ($\mu g/m^3$)	24-Hour AAAQG ($\mu g/m^3$)	Annual Impact ($\mu g/m^3$)	Annual AAAQG ($\mu g/m^3$)
1,3,4-trimtethylbenzene	--	--	1.18	1420	--	--
Benzene	8.16	630	3.38	51	1.02	0.14
Ethylbenzene	0.73	4500	0.29	3500	--	--
Ethanol	--	--	4.00	14000	--	--
Formaldehyde	0.04	20	--	--	--	--
Hexane	7.19	5300	3.01	1400	--	--
Naphthalene	0.00	630	0.00	400	--	--
Toluene	10.20	4700	4.20	3000	--	--
Xylenes	7.00	5500	1.68	3500	--	--

The modeling analysis indicated that, with the exception of annual benzene concentrations, all modeled criteria pollutants and HAPS are below the NAAQS and AAAQGs respectively at the process area boundary (PAB).

The concentrations of benzene at the PAB, at 10 meters from the PAB, and at 20 meters from the PAB are shown in the Table 3 below. The benzene concentration, at 20 meters from the PAB, is less than the AAAQG level of 0.14 microgram per cubic meter. The learning sites referred previously are at least one mile from the facility.

Table 3: Benzene concentration at different points from the PAB

East PAB ($\mu g/m^3$)	10 Meters Beyond East PAB ($\mu g/m^3$)	20 Meters Beyond East PAB ($\mu g/m^3$)	West PAB ($\mu g/m^3$)	10 Meters Beyond West PAB ($\mu g/m^3$)	20 Meters Beyond West PAB ($\mu g/m^3$)	Annual AAAQG ($\mu g/m^3$)
0.348	0.211	0.107	0.504	0.199	0.126	0.14

Based on the modeling results, the Department has determined that the emission impact from the facility at the learning sites will not be adverse.

D. Background Information

The facility was initially operating under Permit No. 131469P099 and is currently operating under Permit No. 1001656, issued on June 11, 2002. The facility was issued a minor permit revision No. 35461 on August 29, 2005, authorizing installation of tank nos. 19 & 20, conversion of tank nos. 14 and 16 to internal floating roof tanks for storing transmix/naphtha, and change of service for tanks nos. 5 through 12 from transmix to diesel. Further, a significant permit revision No. 35894 was issued on May 24, 2006, for installation of a 30,000 gallon bullet tank for butane and for installation of a vapor recovery unit which reduced overall emissions of criteria pollutants by replacing the vapor combustion unit as the primary vapor control device for the facility.

II. FACILITY DESCRIPTION

A. Process Description

1. Distillation Unit

The FPO facility reprocesses or distills transmix, a mixture of diesel fuel and gasoline, to their original end products of gasoline and diesel fuel. The facility utilizes a Transmix Distillation Unit (TDU) consisting of 2 distillation columns to process a maximum of 4500 barrels of feed per day. The facility is equipped with a 8.0 MMBtu/hr natural gas-fired process heater used in conjunction with a heat transfer fluid which provides necessary heat input for distillation columns.

2. Bulk Storage Tanks

The facility has 16 (sixteen) Atmospheric Above-ground Storage Tanks (ASTs), and 2 bullets tanks for storage of following petroleum products:

- 11 (eleven) fixed roof ASTs (Tank Nos. 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, and 12) are used for storing diesel.
- 2 (two) Internal Floating Roof (IFR) ASTs (Tank Nos. 13 and 15) are utilized for storing transmix.
- 2 (two) IFR ASTs (Tank Nos. 14 and 16) are utilized for storing transmix gasoline component.
- 1 (one) IFR AST (Tank No. 4) is utilized for storing ethanol.
- AST bullet (Tank No.17) is connected to VRU/VCU and is currently utilized for storing gasoline blend stock and pressurized bullet (Tank No. 18) is currently utilized for storing butane blend stock.
- 2 (two) future IFR ASTs (Tank Nos. 19 and 20), approved under significant permit revision no. 35461, shall be utilized for storing transmix or transmix gasoline component.

- The facility will be using Tanks Nos. 17 and 18 alternately for storing gasoline blendstock (unleaded gasoline, toluene and xylene), by converting to atmospheric storage and connecting it to VRU/VCU.

3. Loading Rack

The truck loading rack, consisting of 3 (three) lanes, is used for both loading and unloading of petroleum products. Lane 1 is used for unloading of transmix. Lanes 2 and 3, used for loading diesel and gasoline products, have 4 loading arms (3 for diesel and 1 for gasoline). These lanes are also equipped with a vapor collection system.

B. Air Pollution Control

1. Internal Floating Roof (IFR) tanks are utilized for control of volatile organic compounds (VOCs) emissions from gasoline and transmix/naphtha storage tanks.

2. A vapor collection system and a vapor recovery unit (VRU)/vapor combustion unit (VCU) is for control of (VOCs) emissions from loading rack and tanks 17 and 18 when used for storing gasoline blend stock.

III. COMPLIANCE HISTORY

The facility had twenty-one facility inspections since February of 2002. Based on these inspections, five Air Quality cases were initiated in June 2002, April 2003, June 2005, August 2005 and October 2007, respectively. A Consent Judgment (Docket No. CV2004-016697) was filed against the El Mirage Transmix Facility ("the facility") on October 12, 2004, at the time that Equilon Enterprises LLC owned and operated the facility.

1. **Case Number 22892:** A Notice of Violation was issued to Equilon Enterprises LLC on June 10, 2002, for one alleged permit violation based on a review of an Excess Emissions Report from the facility (Inspection ID: 28569). The facility failed to maintain and operate the internal floating roof in accordance with 40 CFR §60.112b(a)(1) while emptying and refilling storage vessels. The facility's deadline to achieve compliance was on June 28, 2002, which was achieved on April 29, 2002. This NOV culminated in Consent Judgment CV2004-016697, which was filed in Superior Court on October 12, 2004.

2. **Case Number 24612:** A Notice of Violation was issued to Equilon Enterprises LLC on April 28, 2003, for four alleged permit violations based on a March 6, 2003, facility inspection (Inspection ID: 33939). The alleged violations are as follows:

a. Failure to operate the closed vent system at all times when emissions from tanks 5-12, the loading racks, and the distillation units are vented to it.

b. Failure to operate the closed vent system and control device in accordance with the facilities Operations and Maintenance plan.

c. Failure to maintain records of when the closed vent system and control device was not operating as designed.

d. Failure to repair pump leak within 15 calendar days after detection.

The compliance conditions for the first three above violations included providing documents which demonstrate that the closed vent system and control device has been repaired and is operating as described in the operations and maintenance plan. Also, Equilon was to submit a copy of a completed inspection report to ensure that the operations and maintenance plan had been implemented. The compliance deadline to submit the documents was June 13, 2003, which was achieved on June 23, 2003. The compliance conditions for the fourth above violation includes submitting component leak reports for 2003, including the repair status of the dripping pumps observed during the March 6, 2003, inspection. The facility's deadline to achieve compliance was June 13, 2003, and Equilon achieved compliance on June 23, 2003. This NOV also culminated in Consent Judgment CV2004-016697, which was filed in Superior Court on October 12, 2004.

3. **Case Number 35229:** A Notice of Violation was issued to Fuel Processing Operators, LLC on June 29, 2005, for five alleged permit violations based on a May 24, 2005, facility inspection (Inspection ID: 62917). The alleged violations are as follows:

   a. Failure to operate the combustion device to reduce the VOC emissions vented to it by 95% weight or greater, or to provide a minimum residence time of .75 seconds at a minimum temperature of 816 Celsius (1,500 degrees Fahrenheit).

   b. Failure to log equipment leaks when a leak is detected.

   c. Failure to conduct monthly leak detection monitoring of pumps in light liquid service.

   d. Failure to monitor valves monthly to detect leaks.

   e. Failure to monitor drains monthly for indications of low water levels or conditions that would reduce the effectiveness of the water seal controls in the oily wastewater system.

   The compliance deadline for the above alleged violations was August 13, 2005, and Fuel Processing Operators, LLC achieved compliance on August 10, 2005.

4. **Case Number 88904**: A Notice of Violation was issued to Fuel Processing Operators, LLC on October 22, 2007, for their alleged failure to submit a permit renewal application to ADEQ at least 6 months prior to the expiration of their permit on June 10, 2007.

   The compliance conditions for the above violations included providing ADEQ the status of their application for permit renewal. The facility's deadline to achieve compliance was on November 30, 2007.

   This NOV culminated in a Consent Judgment CV 2009-013377 which was filed in Superior Court on May 27, 2009.

IV. EMISSIONS

Facility-wide emissions (after controls) are summarized in the following table.

Table 4: Facility-wide Emissions

Pollutant	Storage Tanks	Loading Operations	Heater	Vapor Combustion Unit	Vapor Recovery Unit	Total
	tpy	tpy	tpy	tpy	tpy	tpy
CO			2.89	6.86		9.74
NO_x			3.43	8.16		11.59
SO_2			0.02	0.05		0.07
PM_{10}			0.26	0.62		0.89
VOC	7.55	1.38	0.19	0.45	0.68	10.24
HAPs	0.312	0.042	0.064	0.153	0.049	0.62

V. APPLICABLE REGULATIONS

The following table summarizes the ADEQ findings with respect to applicable requirements to emission units:

Table-5

Unit ID	Control Equipment	Applicable Regulations	Verification
Distillation towers and oily water separator	N/A	A.A.C. R18-2-730	These requirements for unclassified sources are applicable to Distillation towers and oily water separator.
Process Heater	N/A	A.A.C. R18-2-724	The natural gas-fired heater is subject to A.A.C. R18-2-724 standards.
Storage Tanks	Floating roofs, vapor recovery unit (VRU)/ vapor control unit (VCU)	Maricopa County rule 350 40 CFR 60 Subpart Kb	The facility is located in Maricopa County. Hence, Maricopa County Rule 350, is applicable to storage tanks with capacity more than 250 gallons, and vapor pressure more than 1.5 psia. Also, 40 CFR 60 Subpart Kb is applicable to storage tanks meeting the capacity and vapor pressure applicability requirements.
Loading racks	Vapor recovery unit (VRU)/ vapor control unit (VCU)	Maricopa County rule 351	These requirements for gasoline loading racks are applicable to the facility, as the facility is located in Maricopa county.
Gasoline distribution bulk terminal	Vapor recovery unit (VRU)/ vapor control	40 CFR 63 Subpart BBBBBB	This Subpart became effective on January 10, 2008, and is applicable to existing bulk terminals (gasoline storage

Unit ID	Control Equipment	Applicable Regulations	Verification
	unit (VCU)		tanks, loading racks, and vapor collection-equipped gasoline cargo tanks. The facility being an existing source, is required to comply with the requirements under this Subpart no later than January 10, 2011.
Fugitive dust sources	Water and other reasonable precautions	A.A.C. R18-2, Article 6, A.A.C. R18-2-702	These are applicable to fugitive dust sources at the facility.
Mobile sources	Water Sprays/Water Truck for dust control	A.A.C. R18-2, Article 8	This Article is applicable to off-road mobile sources, which either move while emitting air pollutants or are frequently moved during the course of their utilization.
Other periodic activities	N/A	A.A.C. R18-2-730 A.A.C. R18-2-1101.A.8	This section deals with activities such as sandblasting, demolition/renovation asbestos control, and gaseous or odorous materials handling.

VI. PREVIOUS PERMIT AND PERMIT CONDITIONS

A. PREVIOUS PERMITS

Table 6: PREVIOUS PERMITS

Permit #	Issue Date	Application Basis
1001656	June 11, 2002	Class II Operating Permit
35461	August 29, 2005	Minor Permit Revision
35984	May 24, 2006	Significant Permit Revision

B. PREVIOUS PERMIT CONDITIONS

Operating Permit No. 1001656 (As revised by Significant Permit Revision No. 35984)

Table-7

Condition # in permit no. 35984	Determination				Comments
	Delete	Kept	Revise	Streamline	
Attachment A			x		This Attachment has been revised and most recent Attachment "A" is used for this permit.
Attachment B					
Condition I.A		x			This requirement for Method 9 certified observer is retained as Condition I.A.1.
Condition I.B.1		x			This compliance certification requirement is relocated as Condition I.B.2.
Condition I.B.2		x			This logging requirement for maintenance activities is relocated as Condition I.B.3.
Conditions I.B.3 and I.B.4	x				These recordkeeping requirements are deleted as these are covered in Attachment A.
Condition II.A		x			This applicability requirement for distillation units is retained.
Condition II.B.1.a			x		This Condition for opacity for distillation units is revised to reflect current Maricopa county rules, and is relocated as Condition II.B.1.c.
Conditions II.B.1.b and c		x			These Conditions for particulate matter emissions for distillation units is relocated as Conditions II.B.1. a and b.
Condition II.B.2		x			This monitoring and recordkeeping requirement for opacity is relocated as Condition II.B.2.a.
Conditions II.C and II.D	x				These requirements for NO_x and SO_2 are deleted as these emissions are not expected from distillation unit, cooling tower, and oil-water separator.
Condition II.E.1		x			This Condition for odor is relocated as a facility-wide Condition under I.A.3
Conditions II.E.2 and 3		x			These conditions for unclassified sources are relocated as Conditions II.C.1 and 2.
Condition III.A		x			This applicability requirement for process heater is retained.

Condition # in permit no. 35984	Determination				Comments
	Delete	Kept	Revise	Streamline	
Condition III.B.1		x			This Condition for particulate matter and opacity standards for process heater is relocated as Condition III.C.1
Condition III.B.2		x			This monitoring and recordkeeping requirement for opacity for process heater is relocated as Condition III.C.2.
Condition IV.B.1			x		The list of regulated tanks is revised and the tanks deemed as "Insignificant Activities" are taken off the List.
Condition IV.B.2.a			x		This Condition for opacity is revised to reflect current Maricopa county rules, and is relocated as Condition IV.B.1.
Condition IV.B.2.b		x			This Maricopa County (MC) operating limitation for gasoline storage tank is relocated as Condition IV.B.2.f.
ConditionsIV.B.2.c and d		x			These MC operating limitations for gasoline/organic liquid storage tanks are covered under Condition IV.B.2.e.
Condition IV.B.2.e		x			This MC operating limitation for organic liquid storage tank for vapor pressure greater than 11.0 psia is relocated as Condition IV.B.2.d.
Condition IV.B.2.f		x			The MC requirements for internal floating roof (IFR) tanks are now located under condition IV.B.2.e.
Condition IV.B.2.g		x			The MC requirements for tanks connected to vapor collection/processing system are now located under condition IV.B.2.e.
Condition IV.B.2.h		x			This MC monitoring, recordkeeping and reporting requirements for storage tanks are now relocated under Condition IV.B.3.
Condition IV.B.2.i		x			This MC testing requirements for storage tanks are now relocated under Condition IV.B.4.
Condition IV.B.3.a.i		x			The NSPS emission standards for storage tanks are covered under Condition IV.C.2.a(1).
Condition IV.B.3.a.ii	x				This emission standard is not applicable to any storage tank at the facility, and, hence, deleted.
Condition IV.B.3.b		x			This requirement for pumps is covered under Condition IV.B.2.c.
Conditions IV.B.3.c.i(a) through (d)		x			These NSPS testing requirements for IFR storage tanks are now relocated under Condition IV.C.2.b(1).

Condition # in permit no. 35984	Determination				Comments
	Delete	Kept	Revise	Streamline	
Condition IV.B.3.c.i(e)		x			This NSPS notification requirement for IFR storage tanks is now relocated under Condition IV.C.1.a(1).
Condition IV.B.3.c.ii(a)		x			This NSPS notification requirement for IFR storage tanks is now relocated under Condition IV.C.1.a(2).
Condition IV.B.3.c.ii(b) through (d)		x			These NSPS reporting requirements for IFR storage tanks are now relocated under Condition IV.C.3.b.
Condition IV.B.3.c.iii(a)		x			This NSPS recordkeeping requirement for storage tanks is now relocated under Condition IV.C.3.a.
Conditions IV.B.3.c.iii(b) and (c)	x				None of the IFR tanks fall within the specified vapor pressure limits. Hence these are not applicable requirements to these tanks and, hence, deleted.
Section V.B	x				40 CFR 60 Subpart XX is applicable to the facilities receiving gasoline by pipeline, ship or barge. Since this facility receives gasoline by road tankers, this Subpart is not applicable. Hence, this part is deleted.
Condition V.C.1			x		This MC Condition for opacity is revised to reflect the current county rules, and is relocated as Condition V.B.1.
Conditions V.C.2, 3 and 4		x			These MC emission standards for loading racks are relocated under Condition V.C.
Condition V.C.5		x			The MC operating requirements for vapor loss control devices are relocated under Conditions V.D.1 through 5.
Condition V.C.6.a		x			This requirement for leak free loading operations is relocated under Condition V.D.6.
Conditions V.C.6.b and c		x			The MC monitoring and recordkeeping requirements for vapor loss control devices are relocated under Conditions V.E.1 and 2.
Condition V.C.7		x			The MC testing requirements for vapor loss control devices and loading racks are relocated under Section V.F.
Section VI and VII		x			The Conditions for oil-water separator are now covered under Section II.
Section VIII		x			This Section for fugitive dust requirements is renumbered as Section VII.
Section IX A, B and D		x			These requirements for other periodic activities are now located under Section IX.

Condition # in permit no. 35984	Determination				Comments
	Delete	Kept	Revise	Streamline	
Section IX.C		x			The requirements for mobile sources are now located under Section VIII.

VII. Monitoring Requirements

1. Opacity

The Permittee is required to conduct a quarterly survey of visible emissions emanating from all the equipment at the facility. If the opacity of the emissions observed appears to exceed the standard, the observer must conduct a certified EPA Reference Method 9 observation. The Permittee is required to keep records of the initial survey and any EPA Reference Method 9 observations performed. If the observation results in a Method 9 opacity reading in excess of the standard, the Permittee must report this to ADEQ as excess emission as per Section XII of Attachment "A" and initiate appropriate corrective action to reduce the opacity. The Permittee is required to keep records of the corrective actions performed.

2. Internal Floating Roof Tanks

a. The Permittee is required to perform visual inspection through the manholes or roof hatches on an annual basis. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee must repair the items or empty and remove the storage vessel from service within 45 days. If any of the above conditions are detected during the annual visual inspection, a report must be furnished to the Director within 30 days of the inspection. Each report must identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

b. The Permittee is required to perform a complete inspection of the primary seal and floating roof, whenever the tank is emptied for non-operational reasons or at least every five years, whichever is more frequent.

c. The Permittee is required to keep a record of each inspection performed. Each record must identify the storage vessel on which the inspection was performed and must contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

3. Gasoline and Toluene/Xylene Tanks (Tank Nos. 17 and 18)

These tanks, at all times while being used to store gasoline, toluene and/or xylene, must use vapor collection system along with vapor recovery system (VRU) or vapor combustion system (VCU) to process and prevent at least 95% of all such vapors escaping to atmosphere. The Permittee is required to ensure vapor tightness of vapor collection/processing system. The Permittee must monitor the parameters of the closed vent system and control device (VCU/VRU) in accordance with the operating plan

submitted to the Director. The Permittee is required to maintain records of the operating plan and the measured values of the parameters.

4. Gasoline Loading Terminal

a. The Permittee must ensure that any vapor recovery system required is connected between the delivery vessel and the storage tank during all organic liquid transfers. Loading shall be accomplished in a manner that prevents overfills, fugitive liquid leaks or excess organic liquid drainage. Vapor transfer lines must be equipped with fittings that are vapor tight and that automatically and immediately close upon disconnection. Vapor balance systems must be designed to prevent any vapors collected at one loading rack from passing to another loading rack. All equipment associated with delivery and loading operations shall be maintained to be leak free, vapor tight and in good working order. Gasoline must not be spilled, discarded in sewers, stored in open containers, or handled in any other manner that would result in evaporation to the atmosphere.

b. The Permittee is required to perform monthly inspections for liquid and vapor leaks, and for faulty equipment.

VIII. TESTING REQUIREMENTS

1. The Permittee is required to perform annual performance testing for control efficiency of vapor collection/processing system.

2. The Permittee is required to conduct annual leak detection testing of the bulk loading facility.

IX. NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS) REQUIREMENTS

The National Emission Standards for Hazardous Air Pollutants (NESHAPS) for Gasoline Distribution Bulk Terminals and Bulk Plant, 40 CFR 63 Subpart BBBBBB, became effective January 10, 2008, and is applicable to gasoline storage tanks and gasoline loading racks at the facility. All existing sources are required to comply with these standards no later than January 10, 2011. The permit contains the NESHAPs requirements that the Permittee must comply with by January 10, 2011.

X. INSIGNIFICANT ACTIVITIES

Diesel Storage Tanks Nos. 1, 2, 3, 5, 6, 7, 8, 9, 10, 11 and 12 (each 20, 000 gallons) are considered insignificant activities as per A.A.C. R18-2-101.57(c).

XI. LIST OF ABBREVIATIONS

AAAQG ..... Arizona Ambient Air Quality Guideline
A.A.C. ..... Arizona Administrative Code
ADEQ ..... Arizona Department of Environmental Quality
AQD ..... Air Quality Division
CO ..... Carbon Monoxide
HAP ..... Hazardous Air Pollutant
hr ..... Hour
IC ..... Internal Combustion

lb ..... Pound
MMBtu ..... Million British Thermal Units
$\mu g/m^3$ ..... Microgram per Cubic Meter
NAAQS ..... National Ambient Air Quality Standard
NO_x ..... Nitrogen Oxide
NO_2 ..... Nitrogen Dioxide
O_3 ..... Ozone
PM ..... Particulate Matter
PM_{10} ..... Particulate Matter Nominally less than 10 Micrometers
PTE ..... Potential-to-Emit
SO_2 ..... Sulfur Dioxide
TPY ..... Tons per Year
USEPA ..... United States Environmental Protection Agency
VOC ..... Volatile Organic Compound
yr ..... Year