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Governor

1-25-07

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STATE OF NEBRASKA

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CONSTRUCTION PERMIT REVISION

REVISED PERMIT NUMBER: CP06-0012

**ORIGINAL PERMIT TO CONSTRUCT AN
AIR CONTAMINANT SOURCE**

ISSUED ON JANUARY 27, 2005 TO:

E³ BioFuels-Mead, LLC
1344 County Road 10
Mead, Nebraska 68041

FOR THE SPECIFIC CONSTRUCTION OF:

An Ethanol Manufacturing Facility

LOCATED AT:

1344 County Road 10
Mead, Saunders County, Nebraska 68041

IS HEREBY REVISED AS FOLLOWS:

- Change facility name from Nebraska BioClean-Mead, LLC to E³ BioFuels-Mead, LLC;
- Add an SO₂ emissions limit for the boilers and enclosed flare;
- Remove MMBtu/hr boiler capacity limit and associated compliance demonstration methods;
- Lower the lb/hr TRS limit from 12.0 lb/hr to 11.6 lb/hr;
- Revise associated recordkeeping and compliance demonstration requirements;
- Revise wet cake testing requirement;
- Correct typo in Table E-1: Storage Tanks;
- Revise deviation reporting requirements; and
- Establish major source threshold HAP limitations and calculation methodology.

Pursuant to Chapter 14 of the Nebraska Air Quality Regulations, the public has been notified by prominent advertisement of this proposed modification of an air contaminant source and the thirty (30) day period allowed for comments has elapsed. This Construction Permit supersedes Condition XIII.(A), Condition XIII.(D), Condition XIII.(E)(1), Condition XIII.(Q), and Conditions XIII.(R)(1) through (5) of the original construction permit issued on January 27, 2005. This Construction Permit also adds additional recordkeeping requirements, Conditions XIII.(R)(19) and XIII.(R)(20), and a new condition, Condition XIII.(S).



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The revision of the construction permit issued on January 27, 2005 addressed herein does not trigger any additional requirements under Nebraska Title 129. No other terms or conditions of the original construction permit issued on January 27, 2005, are being revised or otherwise amended by this document.

All other provisions of the originally issued permit are still in effect, and in concert with this construction permit revision, constitute the effective construction permit. This construction permit revision shall be attached to the original construction permit and maintained with it henceforth.

Condition XIII.(A) now reads:

(A) The following conditions apply to: ANAEROBIC DIGESTION/STEAM GENERATION

- (1) The source is permitted to construct two 54 MMBtu/hr boilers, an anaerobic digester (AD) unit consisting of 2 anaerobic digesters, and an enclosed flare. The boilers, AD unit, and enclosed flare shall be properly installed, operated, and maintained in accordance with manufacturer's documentation. Manufacturer's specifications and instructions, or the equivalent, shall be kept on site and readily available to Department representatives.
- (2) Biogas, natural gas, and distillate fuel oil shall be the only fuels combusted in the boilers. Biogas and natural gas shall be the only fuels combusted in the enclosed flare. (Title 129, Chapters 19, 20, and 24)
 - (a) Sulfur content of the distillate fuel oil shall be limited to 0.19% by weight. (Title 129, Chapters 19 and 24)
 - (b) Compliance with the sulfur content limit in Condition XIII.(A)(2)(a) and the fuel oil specification in Condition XIII.(A)(7)(b) may be demonstrated with fuel supplier certifications. These certifications shall include the following for each distillate fuel oil delivery:
 - (i) The name of the fuel oil supplier. {CFR 60.48c(f)(1)(i)}
 - (ii) A statement from the fuel oil supplier that the oil delivered complies with the specification for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78. {40 CFR 60.48c(f)(1)(ii)}
 - (iii) The sulfur content (% by weight) of the distillate fuel oil and the method used to determine the sulfur content.
- (3) The boilers or enclosed flare shall be used to combust biogas at all times biogas is being produced by the AD unit. (Title 129, Chapter 4)
 - (a) The enclosed flare shall be operated with a flame present whenever biogas is flowing to the unit. A thermocouple or equivalent device connected to a data recorder capable of continuously monitoring the presence of a flame shall be installed. The monitoring device readings shall be recorded at least once per hour. The monitoring device shall be equipped with an alarm to notify plant personnel of biogas flow to the

flare when no combustion is taking place. The monitoring device shall be properly installed, operated, calibrated and maintained. Manufacturer's instructions, or the equivalent, shall be kept on site and readily available to Department representatives.

- (4) The boilers (EP-4) and enclosed flare (EP-9) combined shall not exceed 22.10 pounds per hour of SO₂ (24-hour average). (Title 129, Chapter 19)
- (5) SO₂ emissions from the boilers and enclosed flare shall be calculated each day by using the following equation:

$$E_{SO_2} = (F_{NG} * 0.6 \text{ lb/MMscf} + F_{DF} * 27.36 \text{ lb/1000 gal} + F_{BG} * 173.5 \text{ lb/MMscf}) / 24 \text{ hours/day}$$

where,

E_{SO_2} = SO₂ Emission Rate (lb/hr)

F_{NG} = Natural Gas combusted in the boilers and enclosed flare (MMscf/day)

F_{DF} = Distillate Fuel combusted in the boilers (kgal/day)

F_{BG} = Biogas combusted in the boilers and enclosed flare (MMscf/day)

- (a) The natural gas, distillate fuel, and biogas piping that supplies the boilers and enclosed flare with fuel shall each be equipped with an operational flow meter to record the fuel flow rates. The flow meters shall be installed, operated, and maintained in accordance with manufacturer's documentation, or the equivalent. The flow meters shall be calibrated at least once per year or more frequently per manufacturer's instructions.
- (6) The TRS quantity in the AD unit outlet to the boilers and enclosed flare shall not exceed 11.6 lb/hr (24-hour average). (Title 129, Chapters 4 and 19)
 - (a) No later than 180 days after AD unit startup, the biogas piping from the AD unit outlet to the boilers and enclosed flare shall be equipped with a continuous TRS monitor which complies with the requirements of 40 CFR 60.13, including the requirements of 40 CFR 60 Appendix B Performance Specification 5 and Appendix F, unless written approval is obtained from the Department.
- (7) The boilers shall comply with the requirements of New Source Performance Standards (NSPS) in 40 CFR 60, Subparts A and Dc (Title 129, Chapter 18, Sections 001.01 and 001.52). The requirements of Subparts A and Dc include, but are not limited to, the following:
 - (a) The owner or operator shall submit notification of the date of construction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include the design heat input capacity of the affected facility and identification of fuels to be combusted, and the annual capacity factor, as defined in 40 CFR 60.41c, at which the source anticipates operating the unit based on all fuels fired and based on each individual fuel fired.

- (b) All distillate fuel combusted shall comply with the specification for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78. {40 CFR 60.41c}
 - (c) When firing oil, visible emissions from the boilers are limited to 20 percent opacity (6 minute average), except for one 6-minute period per hour of not more than 27 percent opacity. {40 CFR 60.43c(c)} This standard applies at all times when oil is fired, except during periods of start-up, shutdown, or malfunction. {40 CFR 60.43c(d)}
 - (d) Semi-annual reports shall be submitted to the Department in accordance with 40 CFR 60.48c(d) and (j). These reports shall include the fuel supplier certifications and a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel oil combusted for the quarter. {40 CFR 60.48c(e)(11)}
 - (e) The source shall record and maintain records of the amounts of each fuel combusted during each month in the boilers. {40 CFR 60.48c(g)}.
- (8) Within 60 days after reaching maximum capacity but not more than 180 days after the start-up of operations, a performance test and/or analytical testing shall be conducted for at least one of the two boilers in accordance with Condition XIII.(P) to determine the following. (Title 129, Chapter 34)
- (a) NO_x emissions (lb/hr) from the boiler during combustion of biogas. The performance test shall be conducted while the boiler is operating at full capacity.
 - (b) Ammonia (NH₃) content of biogas combusted during the NO_x performance test required in Condition XIII.(A)(8)(a).

Condition XIII.(D) now reads:

- (D) The following conditions apply to: WET CAKE STORAGE AND LOADOUT
 - (1) The source shall conduct analytical testing, or other method approved by the NDEQ, within 60 days after reaching maximum capacity but not more than 180 days after the start-up of operations to determine the VOC and HAP emissions from the wet cake (WDGS). The performance test shall be conducted in accordance with Condition XIII.(P). (Title 129, Chapter 34)

Condition XIII.(E)(1) now reads:

- (E) The following conditions apply to: STORAGE TANKS
 - (1) The storage tanks consist of the aboveground storage tanks listed in Table E-1.

Table E-1: Storage Tanks

Tank ID	Volume (Gallons)	Material Stored	Type of Tank
TK-801 A	≤22,600	Anhydrous Ethanol	Fixed Roof
TK-801B	≤22,600	Anhydrous Ethanol	Fixed Roof
TK-803	≤22,600	Off-spec Ethanol	Fixed Roof
TK-808	≤22,600	Denaturant (Gasoline)	Internal Floating Roof
TK-810	≤535,830	Denatured Ethanol	Internal Floating Roof
TK-899	≤21,193	Distillate Fuel Oil	Fixed Roof

Condition XIII.(Q) now reads:

- (Q) The permittee shall report all deviations from permit requirements, identify the probable cause of the deviations, and list any corrective actions or preventative measures taken. All reports of deviations must be submitted within the time frame below:
- (1) Any deviation resulting from a situation that arises from sudden, unavoidable, and reasonably unforeseeable events beyond the control of the source, including acts of God, which require immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency, not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error shall be reported within two working days of the date on which the permittee first became aware of the deviation;
 - (2) Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported as soon as is practicable;
 - (3) Any other deviations that are identified shall be submitted to the Department semi-annually. The permittee shall submit a report of applicable monitoring and all instances of deviations from permit requirements for every six (6) calendar months to the Department. The report for the first six months (January through June) is due by September 30 of each year. The report for the second six months (July through December) is due by March 31 of the following year. Each report must be certified by a responsible official.

Conditions XIII.(R)(1) through (5) now read:

- (1) Fuel receipts and fuel supplier certifications to show compliance with Conditions XIII.(A)(2)(b), (A)(7)(d), and (J)(2).
- (2) Monitoring device readings for the flare and vapor combustion unit to demonstrate compliance with Conditions XIII.(A)(3)(a) and (F)(2)(d).
- (3) Records documenting the pound per hour (lb/hr) sulfur dioxide emissions (24-hour average) to demonstrate compliance with Condition XIII.(A)(4).

- (4) Records of the amount of natural gas, distillate fuel, and biogas combusted in the boilers and enclosed flare each day to demonstrate compliance with Condition XIII.(A)(5).
- (5) Records of hourly averaged TRS concentration of the AD unit outlet to the flare and boilers. TRS quantities in the AD unit outlet to the flare and boilers shall be compiled within 15 days after the end of each calendar month and the calculations shall be kept on file to show compliance with Condition XIII.(A)(6).

Conditions XIII.(R)(19) and (R)(20) read:

- (19) Notifications and record keeping as required by 40 CFR 60.7 and 40 CFR 60.48c to show compliance with Condition XIII.(A)(7).
- (20) Compliance with Condition XIII.(S) may be demonstrated with the following records:
 - (a) Emission calculations performed in accordance with the emission calculation methodology specified in Attachment A of this permit. The permittee shall keep appropriate records to support the emission calculations including, but are not limited to, actual material throughput rates, production rates, fuel usage rates, and operating hours.

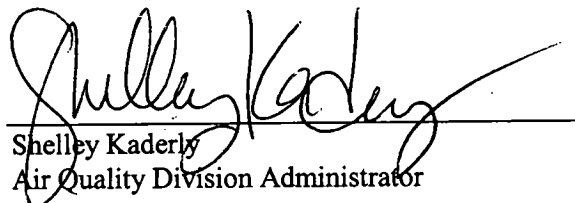
Condition XIII.(S) reads:

- (S) The facility shall emit less than the following in any period of twelve (12) consecutive calendar months. At no time during the first eleven (11) calendar months after the startup date shall the sum of all the previous months' emissions equal or exceed the following emission limitations. Compliance with this condition shall be demonstrated using the testing results conducted as specified in Condition XIII.(P) and emission calculations records as specified in Condition XIII.(R)(20) of this permit. (Title 129, Chapters 27 and 28)
 - (1) 10 tons of any individual HAP.
 - (2) 25 tons of total combined HAPs

The undersigned issues this document on behalf of the Director in accordance with Title 129 – Nebraska Air Quality Regulations.

1/25/07

Date



Shelley Kaderly
Air Quality Division Administrator

ATTACHMENT A EMISSION CALCULATION METHODOLOGY

To demonstrate compliance with the emission limits specified in Condition XIII.(S), emissions shall be calculated each calendar month using data from the following sources listed in descending order of preference. For compliance purposes, total HAP is equivalent to the sum of individual HAPs.

1. Most recent valid performance test results performed in the past five years.
2. Manufacturer's guarantees and Material Safety Data Sheet (MSDS)
3. Manufacturer/engineering estimates
4. Emission factors from AP-42 or other EPA published documents

If it is necessary to convert uncontrolled to controlled emissions, multiply the uncontrolled emissions by one minus the overall control efficiency (fraction) of the control equipment.

Loadout Flare Pilot

Emissions from the loadout flare pilot shall be calculated using Equation (1).

$$(1) \quad E_U = (EF) \times (NG_U) / (2000 \text{ lbs/ton})$$

Where

E_U = Emissions from Unit (tons/month)
 EF = Emission factor (lbs/MMscf)
 NG_U = Natural Gas Usage of Unit (MMscf/month)

Pollutant	Emission Factor (lb/MMscf)
Individual HAPs	
Benzene	0.0021
Dichlorobenzene	0.0012
Formaldehyde	0.075
Hexane	1.8
Lead Compounds	0.0005
Naphthalene	0.00061
Polycyclic Organic Matter (POM)	0.0000882
Toluene	0.0034
Arsenic Compounds (ASC)	0.0002
Beryllium Compounds (BEC)	0.000012
Cadmium Compounds (CDC)	0.0011
Chromium Compounds (CRC)	0.0014
Cobalt Compounds (COC)	0.000084
Manganese Compounds (MNC)	0.00038
Mercury Compounds (HGC)	0.00026
Nickel Compounds (NIC)	0.0021
Selenium Compounds (SEC)	0.000024
Total HAPs	1.89

Fermentation and Distillation Operations

Emissions from the fermentation and distillation scrubber shall be calculated using Equation (2).

$$(2) \quad E_s = (CEF_s) \times (OT)$$

Where E_s = Emissions from Scrubber (tons/month)
 CER_s = Controlled process emission rate (lbs/hr)
 OT = Operating Time

Hazardous Air Pollutant	Controlled Process Emission Factors (lbs/hour)
Acetaldehyde (Unspeciated)	1.3680
Methanol	0.2400
Total HAPs	1.6080

Liquid Product Loadout

Emissions from liquid product loadout shall each be calculated using Equations (3a) through (3j).

$$(3a) \quad E_{VOC,LL,T} = E_{VOC,LL,T,G} + E_{VOC,LL,T,E} + E_{VOC,LL,T,D}$$

$$(3b) \quad E_{VOC,LL,T} = \{[(EF_{VOC,LL,T,G}) \times (P_{LL,T})] + [(EF_{VOC,LL,T,E}) \times (P_{LL,T})] + [(EF_{VOC,LL,T,D}) \times (P_{LL,T})]\} / (2000 \text{ lbs/ton})$$

Where $E_{VOC,LL,T}$ = VOC Emissions from Liquid Loadout into Trucks (tons/month)
 $E_{VOC,LL,T,G}$ = VOC Emissions from displacing Gasoline from Trucks (tons/month)
 $E_{VOC,LL,T,E}$ = VOC Emissions from Loading Ethanol into Trucks (tons/month)
 $E_{VOC,LL,T,D}$ = VOC Emissions from Loading Denaturant into Trucks (tons/month)
 $EF_{VOC,LL,T,G}$ = VOC Controlled Emission Factor for displacing gasoline from Trucks (lbs/Mgal)
 $EF_{VOC,LL,T,E}$ = VOC Controlled Emission Factor for loading ethanol into Trucks (lbs/Mgal)
 $EF_{VOC,LL,T,D}$ = VOC Controlled Emission Factor for loading denaturant into Trucks (lbs/Mgal)
 $P_{LL,T}$ = Product loaded into Trucks (Mgal/month)
 $E_{VOC,LL,T,E}$ = VOC Emissions from Loading Ethanol into Trucks (tons/month)
 $E_{VOC,LL,T,D}$ = VOC Emissions from Loading Denaturant into Trucks (tons/month)

Pollutant	Controlled Emission Factors (lbs/Mgal)
	Truck Loadout
VOC	
Gasoline	0.869
Ethanol	9.023
Denaturant	0.155

$$(3c) \quad E_{HAP,LL,T} = E_{HAP,LL,T,G} + E_{HAP,LL,T,E} + E_{HAP,LL,T,D}$$

$$(3d) \quad E_{HAP,LL,T} = (E_{VOC,LL,T,G} \times WF_{HAP,G}) + (E_{VOC,LL,T,E} \times WF_{HAP,E}) + (E_{VOC,LL,T,D} \times WF_{HAP,D})$$

Where:

$E_{HAP,LL}$	= HAP emissions from liquid loadout (tons/month)
$E_{HAP,LL,T}$	= HAP Emissions from Liquid Loadout into Trucks (tons/month)
$E_{HAP,LL,T,G}$	= HAP Emissions from displacing Gasoline from Trucks (tons/month)
$E_{HAP,LL,T,E}$	= HAP Emissions from Loading Ethanol into Trucks (tons/month)
$E_{HAP,LL,T,D}$	= HAP Emissions from Loading Denaturant into Trucks (tons/month)
$W_{FHAP,G}$	= Weight Fraction of HAP in Gasoline (HAP/VOC)
$W_{FHAP,E}$	= Weight Fraction of HAP in Ethanol (HAP/VOC)
$W_{FHAP,D}$	= Weight Fraction of HAP in Denaturant (HAP/VOC)

Pollutants	Weight Fraction of VOC Emissions		
	Gasoline	Ethanol	Denaturant
Individual HAPs			
Acetaldehyde	N/A	2.00E-04	N/A
Benzene	2.50E-03	N/A	2.50E-03
Carbon disulfide	2.00E-05	N/A	2.00E-05
Cumene	1.00E-04	N/A	1.00E-04
Ethyl benzene	5.00E-05	N/A	5.00E-05
n-Hexane	5.00E-02	N/A	5.00E-02
Methanol	N/A	2.00E-04	N/A
Toluene	5.00E-03	N/A	5.00E-03
Xylene	5.00E-04	N/A	5.00E-04
Total HAPs	5.82E-02	4.00E-04	5.82E-02

WDGS Storage

Emissions from the WDGS storage shall be calculated using Equation (4).

$$(4) \quad E_{wc} = (EF_{wc}) \times (P_{wc}) / (2,000 \text{ lbs/ton})$$

Where:

E_{wc}	= Emissions from WDGS storage (tons/month)
EF_{wc}	= Emission factor for WDGS storage (lbs/ton WDGS)
P_{wc}	= WDGS stored as product (tons WDGS/month)

Pollutant	Emission Factor (lb/ton)
Individual HAPs	
Acetaldehyde	1.11E-04
Acrolein	1.67E-05
Formaldehyde	2.22E-04
Methanol	4.44E-05
Total HAPs	3.94E-04

Emergency Firewater Pump

Emissions from the emergency firewater pump shall be calculated using Equation (5).

$$(5) \quad E_E = (EF_E) \times (HI_E) \times OT / (2000 \text{ lbs/ton})$$

Where

- E_E = Emissions from Engine (tons/month)
- EF_E = Emission factor for Engine (lbs/MMBtu)
- HI_E = Heat Input of Engine (MMBtu/hr)
- OT = Operating Time of Engine (hours/month)

Pollutant	Emission Factor (lb/MMBtu)
Individual Hazardous Air Pollutants (HAP)	
Acetaldehyde	7.67E-04
Acrolein	9.25E-04
Benzene	9.33E-04
Formaldehyde	1.80E-03
Naphthalene	8.48E-05
Toluene	4.09E-04
Xylene	2.85E-04
Total HAPs	5.20E-03

Storage Tanks

VOC emissions from storage tanks shall be calculated using the EPA's TANKS program. HAP emissions from each of the storage tanks shall be calculated using Equation (6).

$$(6) \quad E_{ST-HAP} = (E_{ST-VOC}) \times (PPM_{ST}/10^6)$$

Where:

- E_{ST-HAP} = Individual HAP emissions from storage tank (tons/month)
- E_{ST-VOC} = VOC emissions from storage tank (tons/month)
- PPM_{ST} = HAP content of material stored in storage tank (ppm by weight)

Equipment Leaks

VOC emissions from equipment leaks shall be calculated using Equation (7). HAP emissions from equipment leaks shall be calculated using Equation (8). These equations are based on compliance with the LDAR program.

$$(7) \quad LK_{voc} = \{ \Sigma [(N-LK) \times (EF-LK) \times (1-(CE-LK/100))] \} \times (OH-LK) \times (2.21 \text{ lbs/kg}) / (2,000 \text{ lbs/ton})$$

Where:

- LK_{voc} = VOC emissions from equipment leaks (tons/month)
- Σ = Summation over all types of components
- $N-LK$ = Number of components in each type
- $EF-LK$ = Equipment leak emission factor (kg/hr/source)
- $CE-LK$ = Control efficiency of LDAR system (%)
- $OH-LK$ = Operating hours = 720 or 744 (hrs/month)

$$(8) \quad LK_{HAP} = (LK_{VOC}) \times (PPM-LK/10^6)$$

Where: LK_{HAP} = HAP emissions from equipment leaks (tons/month)
 LK_{VOC} = VOC emissions from equipment leaks (tons/month)
 PPM-LK = HAP content of anhydrous ethanol (ppm by weight)

Boiler Stack and Combustion Flare

HAP emissions from the boiler stack and combustion flare shall be calculated using Equation (9).

$$(9) \quad E_{HAP} = F_{NG} * EF_{NG} + F_{DF} * EF_{DF}$$

Where: E_{HAP} = HAP Emission Rate (lb/hr)
 F_{NG} = Natural Gas combusted in the boilers and enclosed flare (MMscf/day)
 EF_{NG} = HAP Emission Factor for Natural Gas (lb/MMscf)
 F_{DF} = Distillate Fuel combusted in the boilers (kgal/day)
 EF_{DF} = HAP Emission Factor for Distillate Fuel (see units below)

Pollutant	Emission Factors
	Natural Gas (lb/MMscf)
Individual Hazardous Air Pollutants (HAP)	
Benzene	0.0021
Dichlorobenzene	0.0012
Formaldehyde	0.075
Hexane	1.8
Lead Compounds	0.0005
Naphthalene	0.00061
Polycyclic Organic Matter (POM)	0.0000882
Toluene	0.0034
Arsenic Compounds (ASC)	0.0002
Beryllium Compounds (BEC)	0.000012
Cadmium Compounds (CDC)	0.0011
Chromium Compounds (CRC)	0.0014
Cobalt Compounds (COC)	0.000084
Manganese Compounds (MNC)	0.00038
Mercury Compounds (HGC)	0.00026
Nickel Compounds (NIC)	0.0021
Selenium Compounds (SEC)	0.000024

Pollutant	Emission Factors
	Distillate Fuel (lb/kgal)
Individual Hazardous Air Pollutants (HAP)	
Benzene	2.14E-04
Ethylbenzene	6.36E-05
1,1,1 Trichloroethane	2.36E-04
Xylene	1.09E-04
Formaldehyde	3.30E-02
Lead Compounds ²	9.00E-06
Naphthalene	1.13E-03
Toluene	6.20E-03
Arsenic Compounds (ASC) ²	4.00E-06
Beryllium Compounds (BEC) ²	3.00E-06
Cadmium Compounds (CDC) ²	3.00E-06
Chromium Compounds (CRC) ²	3.00E-06
Manganese Compounds (MNC) ²	6.00E-06
Mercury Compounds (HGC) ²	3.00E-06
Nickel Compounds (NIC) ²	3.00E-06
Polycyclic Organic Matter (POM)	3.30E-03
Selenium Compounds (SEC) ²	1.50E-05

²Emission Factor in units of lb/MMBtu

Total HAP is the sum of all individual HAPs.