



Air Quality Permitting Statement of Basis

May 15, 2005

Permit to Construct No. P-040523

Busch Agricultural Resources, Inc., Idaho Falls

Facility ID No. 051-00015

Prepared by:

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AIR QUALITY DIVISION

FINAL PERMIT

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURES	3
1. PURPOSE	4
2. FACILITY DESCRIPTION	4
3. FACILITY / AREA CLASSIFICATION.....	4
4. APPLICATION SCOPE	4
5. PERMIT ANALYSIS.....	5
6. PERMIT CONDITIONS	7
7. PERMIT REVIEW	9
8. RECOMMENDATION.....	9

Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	Hazardous Air Pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pound per hour
MACT	Maximum Achievable Control Technology
mg/m ³	milligrams per cubic meter
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
OEL	occupational exposure limit
PEL	permissible exposure limit
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
SIP	State Implementation Plan
SO ₂	sulfur dioxide
TAP	toxic air pollutant
TAP*	N-(trichloromethyl) thio-4-cyclohexene-1,2-dicarboximide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

2. FACILITY DESCRIPTION

Busch Agricultural Resources, Inc. operates a barley and canola seed processing plant. Seed is received and lifted by a bucket elevator for either direct processing or for storage in one of twelve field seed storage bins for processing at a later time. When processed, the seed is fed to a 1,000 bushel surge bin that feeds a vibratory feeder and debearder, and then a screener. Following screening, the seed can be sent to storage or further processed by a gravity separator or length separators (indent cylinders). The clean seed is sent to cleaned and treated seed storage bins.

The facility can further process canola seed in spiral separators or a precision sizer. All fines and rejected seed are stored in dust bins and eventually loaded out and sold as feed.

Three baghouses control emissions from these operations: the central system baghouse, the canola processing baghouse, and the seed treatment and loadout baghouse. All baghouses collect dust from numerous pick-up points throughout the facility.

3. FACILITY / AREA CLASSIFICATION

Busch Agricultural Resources is defined as a synthetic minor facility because, without permit limits on the potential to emit, the PM₁₀ emissions would exceed 100 tons per year. The AIRS classification is "SM" because, by limiting the throughput for the facility, the potential to emit of PM₁₀ is limited to less than major source levels.

The facility is located within AQCR 61 and UTM zone 12. The facility is located in Jefferson County which is designated as unclassifiable for all criteria pollutants (PM₁₀, CO, NO_x, SO₂, lead, and ozone).

The AIRS information provided in Appendix C defines the classification for each regulated air pollutant at Busch Agricultural Resources. This required information is entered into the EPA AIRs database.

4. APPLICATION SCOPE

Busch Agricultural Resources has submitted an application to modify PTC No. 051-00015, issued December 13, 1995, to:

- Add 15 seed storage bins (4,200 bushel capacity each)
- Increase seed throughput from 0.625 to 2.5 million bushels per year

The increase in PM₁₀ emissions are projected to be 0.115 lb/hr and 0.501 T/yr.

4.1 Application Chronology

10/12/04	Application for PTC received
11/10/04	Application declared complete

1/7/05	Notification letter sent
1/12/05	Application fee received
1/15/05	Draft permit issued
2/1/05	Comments received from facility
4/7/05	Permit processing fee received

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this PTC action.:

5.1 Equipment Listing

Central system fabric filter baghouse

Manufacturer: MAC
 Model No. 120 MCF 255
 Capture efficiency: 99.7 PM₁₀

Canola processing fabric filter baghouse

Manufacturer: Dustex
 Model No. 3630-10-14
 Capture efficiency: 99.7 PM₁₀

Seed Treating Baghouse

Manufacturer: MAC
 Model No.: 144 MWT 40
 Capture efficiency: 99.7% PM₁₀

5.2 Emissions Inventory

The emissions are estimated for particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) in Appendix A. Table 5.1 shows a summary of the estimated hourly emissions (not an increase from previous operations) and the total annual emissions including the increase due to the new equipment and increased throughput.

Table 5.1 EMISSION INVENTORY

Source	PM ^a		PM ₁₀ ^b	
	(lb/hr) ^c	(T/yr) ^d	(lb/hr) ^c	(T/yr) ^d
Seed receiving	0.110	0.480	0.110	0.480
Headhouse	0.003	0.011	0.001	0.006
Bin removal	0.001	0.005	0.001	0.003
Grain cleaning & sizing	0.005	0.023	0.001	0.006
Clean seed to storage	0.001	0.005	0.001	0.003
Clean seed to loadout	0.002	0.008	0.001	0.003
Total:	0.122	0.532	0.115	0.501

^{a)} Particulate Matter

^{b)} Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers

^{c)} Pounds per hour

^{d)} Tons per year

The application states that the seed treatment process will remain unchanged, except for an increase in the seed treatment chemical usage. The facility then provided additional information on January 4, 2005 stating that none of the original seed treatment chemicals are currently used. The chemical used currently is Raxil XT WP. This chemical is in powder form and is mixed with water prior to application to the seed. Emissions are estimated to be 2.51E-07 pounds per hour (lb/hr) for Raxil XT WP, which includes 3.75E-08 lb/hr of Tebuconazole and 5E-08 lb/hr of Metalaxyl, which are components of Raxil XT WP.

These compounds are not listed as toxic air pollutants in IDAPA 58.01.01.585 or 586. An assessment was done by the DEQ air toxics analyst, who concluded that, based on the analysis, it is unlikely that the concentrations of metalaxyl or tebuconazole will exceed an acceptable ambient concentration that was determined for these chemicals. An e-mail is included as Appendix B which documents this finding.

5.3 Modeling

The projected increase in PM₁₀ emissions from this modification are less than the modeling thresholds of 0.2 lb/hr and 1.0 T/yr as specified in DEQ's Air Quality Modeling Guideline, dated December 31, 2002. Therefore, no air dispersion modeling is required.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC.

IDAPA 58.01.01.201 Permit to Construct Required

A permit to construct is required for the increase in throughput of the seed processing plant because the PM₁₀ emissions were estimated using baghouses to reduce the emissions. Unless a permit to construct is obtained, the baghouses cannot be used to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS), for determining applicability to Title V permitting, or for Prevention of Significant Deterioration (PSD) applicability determinations.

IDAPA 58.01.01.161 Toxic Substances

This regulation is as follows:

Any contaminant which is by its nature toxic to human or animal life or vegetation shall not be emitted in such quantities or concentrations as to alone, or in combination with other contaminants, injure or unreasonably affect human or animal life or vegetation.

Compliance with this regulation was assessed as discussed in Section 5.2 of this statement of basis and in Appendix B for the fungicide used to treat the seeds.

Subpart DD Standards of Performance for Grain Elevators

This section applies as follows:

“(a) The provisions of this subpart apply to each affected facility at any grain terminal elevator or any grain storage elevator, except as provided under §60.304(b). The affected facilities are each truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations.”

To determine if this section applies, the definition of “grain terminal elevator” is stated:

“(c) Grain terminal elevator means any grain elevator which has a permanent storage capacity of more than 88,100 m³ (ca. 2.5 million U.S. bushels), except those located at animal food manufacturers, pet food manufacturers, cereal manufacturers, breweries, and livestock feedlots.”

Also, the definition of “grain” is stated:

“(a) Grain means corn, wheat, sorghum, rice, rye, oats, barley, and soybeans.”

Barley is listed. Canola is not. The total storage capacity of the facility is 192,000 bushels, which is less than the limit of 2.5 million bushels. Therefore, Subpart DD does not apply to this facility.

5.5 Fee Review

The Busch Agricultural Resources facility is subject to a PTC processing fee in accordance with IDAPA 58.01.01.225. The fee is based on the increase in allowable emissions. The calculated increase in emissions is less than 1 ton per year, so the PTC processing fee is \$1,000. The facility is not a Title V source, so registration fees are not applicable. The PTC application fee of \$1,000 was received on January 12, 2005. The PTC processing fee of \$1,000 was received on April 7, 2005.

Table 5.1 PTC PROCESSING FEE TABLE

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	0	0.0
SO ₂	0.0	0	0.0
CO	0.0	0	0.0
PM ₁₀	0.501	0	0.501
VOC	0.0	0	0.0
TAPS/HAPS	0.0	0	0.0
Total:	0.501	0	0.501
Fee Due	\$ 1,000.00		

6. PERMIT CONDITIONS

Several changes have been made to the PTC, as follows:

The small grains seed conditioning throughput limit (formerly Permit Condition 3.1, currently Permit Condition 2.5) was changed from an hourly limit to a 12-month limit because the daily emissions are inherently limited by the maximum design capacity.

The annual throughput limit, however, is less than the maximum potential throughput. Therefore, annual tracking is required to assess compliance with the annual limit. Annual compliance is determined on a monthly basis for a 12-consecutive-month time period. Therefore, the tracking requirement was changed to monthly, which can then be combined with the annual monitoring requirement. The annual monitoring requirement was changed from “annually, based on a calendar year” to “for that month and for the most recent 12-month period.”

The same changes (12-month limit, no hourly or daily limits) were made to the small grain seed treating and conditioning permit conditions, formerly Permit Conditions 3.1 and 4.2, currently Permit Conditions 3.5 and 2.7. The former Permit Condition 4.2 was eliminated and combined with Permit Conditions 3.5 and 2.7 because the amount of treated seed is 95+% of the total amount of seed processed. Therefore, tracking of the total amount of seed will demonstrate compliance with the throughput limits for Sections 2 and 3 of the permit.

All performance testing requirements were eliminated from the permit. This includes seed conditioning Permit Conditions 4.1, 5.1, and 5.2, and seed treating and cleaning Permit Conditions 4.1, 5.1, and 5.2. These testing requirements were written based on requirements from 40 CFR 60 subpart DD, which is not applicable to this facility.

The permit conditions regarding opacity exceedances of greater than 10% were removed because 10% opacity applies to facilities that are subject to 40 CFR 60 subpart DD, not to this facility. The permit conditions that limit emissions from the baghouses to 20% opacity are included in this PTC. Also, according to the DEQ Idaho Falls Regional Office, there have been no opacity complaints and no opacity exceedances observed for this facility.

A requirement to develop an operation and maintenance manual for the baghouses was written for each section of the permit to ensure that the baghouses are operated maintained correctly and will minimize emissions.

The following permit condition has been removed from the permit (formerly Permit Condition 3.2):

“The permittee shall utilize only chemicals approved under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) for use on small grains seed in the seed treatment process. Seed treatment chemicals shall be used in a manner prescribed and approved under the FIFRA program. The seed treatment chemicals used in the seed treatment process shall demonstrate compliance with all applicable toxic air pollutant (TAP) rules and regulations in accordance with IDAPA 58.01.01.210.”

Compliance with the FIFRA regulations are managed under a separate program and are not required to be addressed by a PTC.

The permit condition (formerly 4.4) that requires reasonable control of fugitive emissions remains in the PTC. The requirement to monitor and record methods used to control fugitive dust on a daily basis was removed because the facility has been operating since 1990 and DEQ has no records of dust complaints and no records of DEQ-documented failure to reasonably control fugitive emissions. Therefore, daily tracking of control measures used is determined to be unnecessary.

The visible fugitive emission requirements in Permit Conditions 2.4 and 3.4 were revised as follows:

Former Permit Condition 2.4:

Visible fugitive emissions shall not be observed leaving the receiving and loading buildings, any grain handling operation, or traversing any property boundary for a period of periods aggregating more than three minutes in any 60 minute period. This visual determination is to be conducted using Method 22, 40 CFR Part 60, Appendix A.

Revised Permit Condition 2.4:

Visible fugitive emissions shall not be observed traversing any property boundary for a period of periods aggregating more than three minutes in any 60 minute period. This visual determination is to be conducted using Method 22, 40 CFR Part 60, Appendix A.

Former Permit Condition 3.4:

Visible emissions emanating from any and all fugitive sources shall not be observed leaving the property boundaries exceeding a period of periods aggregating more than three minutes in any 60 minute period. Visible emissions shall be determined by Method 22, as described in 40 CFR Part 60, Appendix A, or Department approved alternative method.

Revised Permit Condition 3.4:

Visible fugitive emissions shall not be observed traversing any property boundary for a period of periods aggregating more than three minutes in any 60 minute period. This visual determination is to be conducted using Method 22, 40 CFR Part 60, Appendix A.

7. PERMIT REVIEW

7.1 Regional Review of Draft Permit

The DEQ Idaho Falls Regional Office reviewed the draft permit and responded on January 21, 2005 that the permit was acceptable.

7.2 Facility Review of Draft Permit

The facility submitted comments on February 1, 2005 requesting the following:

- Modify visible fugitive emissions monitoring requirement to remove the phrase, “Visible fugitive emissions shall not be observed leaving the receiving and loading buildings,” while leaving the remaining restriction on visible fugitive emissions traversing any property boundary.
- Require tracking of total small grains seed only and not also the amount of treated small grains seed.

These comments were incorporated as described in Section 6 of this statement of basis.

7.3 Public Comment

An opportunity for public comment period on the PTC application was provided in accordance with IDAPA 58.01.01.209.01.c. There were no comments on the application and no requests for a public comment period on DEQ’s proposed action.

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that Busch Agricultural Resources be issued PTC No. P-040523 for the increased throughput and additional storage bins. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

CZ/sd Permit No. P-040523

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APPENDIX A

Emissions Inventory

EP-1: SEED RECEIVING

Annual Throughput = 60,000 tons/yr

Hourly Rate = 6.85 tons/hr

Grain Receiving Emission Factor = 0.016 lb PM/ton

0.016 lb PM10/ton

Emission factors are controlled, based on the use of a fabric filter (AP-42; Table 9.9.1-2)

Hourly Emission Rate Calculation:

$(6.85 \text{ tons/hr}) * (0.016 \text{ lb/ton}) = 0.110 \text{ lb/hr PM}$

$(6.85 \text{ tons/hr}) * (0.016 \text{ lb/ton}) = 0.110 \text{ lb/hr PM10}$

Annual Emission Rate Calculation:

$(60,000 \text{ tons/yr}) * (0.016 \text{ lb/ton}) * (1 \text{ ton}/2000 \text{ lb}) = 0.480 \text{ tons/yr PM}$

$(60,000 \text{ tons/yr}) * (0.016 \text{ lb/ton}) * (1 \text{ ton}/2000 \text{ lb}) = 0.480 \text{ tons/yr PM10}$

EP-2: HEADHOUSE

Annual Throughput = 120,000 tons/yr

Hourly Rate = 13.7 tons/hr

Assume seed passes through headhouse twice

Headhouse and Internal Handling Emission Factor = 0.061 lb PM/ton
0.034 lb PM10/ton

Assumption: Emission factors are uncontrolled (AP-42; Table 9.9.1-1). Headhouse is controlled by a fabric filter with 99.7% control efficiency.

Hourly Emission Rate Calculation:

$$(13.7 \text{ tons/hr}) * (1 - 0.997) * (0.061 \text{ lb/ton}) = 0.003 \text{ lb/hr PM}$$

$$(13.7 \text{ tons/hr}) * (1 - 0.997) * (0.034 \text{ lb/ton}) = 0.001 \text{ lb/hr PM10}$$

Annual Emission Rate Calculation:

$$(120,000 \text{ tons/yr}) * (1 - 0.997) * (0.061 \text{ lb/ton}) * (1 \text{ ton}/2000 \text{ lb}) = 0.011 \text{ tons/yr PM}$$

$$(120,000 \text{ tons/yr}) * (1 - 0.997) * (0.034 \text{ lb/ton}) * (1 \text{ ton}/2000 \text{ lb}) = 0.006 \text{ tons/yr PM10}$$

EP-3: BIN REMOVAL

Annual Throughput = 60,000 tons/yr

Hourly Rate = 6.85 tons/hr

Headhouse and Internal Handling Emission Factor = 0.061 lb PM/ton
0.034 lb PM10/ton

Assumption: Emission factors are uncontrolled (AP-42; Table 9.9.1-1). Bin Removal equipment is controlled by a fabric filter with 99.7% control efficiency.

Hourly Emission Rate Calculation:

$$(6.85 \text{ tons/hr}) * (1 - 0.997) * (0.061 \text{ lb/ton}) = 0.001 \text{ lb/hr PM}$$

$$(6.85 \text{ tons/hr}) * (1 - 0.997) * (0.034 \text{ lb/ton}) = 0.001 \text{ lb/hr PM10}$$

Annual Emission Rate Calculation:

$$(60,000 \text{ tons/yr}) * (1 - 0.997) * (0.061 \text{ lb/ton}) * (1 \text{ ton}/2000 \text{ lb}) = 0.005 \text{ tons/yr PM}$$

$$(60,000 \text{ tons/yr}) * (1 - 0.997) * (0.034 \text{ lb/ton}) * (1 \text{ ton}/2000 \text{ lb}) = 0.003 \text{ tons/yr PM10}$$

EP-4: GRAIN CLEANING/SIZING

Annual Throughput = 60,000 tons/yr

Hourly Rate = 6.85 tons/hr

Grain Cleaning, Internal Vibrating Emission Factor = 0.075 lb PM/ton

0.019 lb PM10/ton

Assumption: Emission factors are controlled with a cyclone (AP-42; Table 9.9.1-1), with an assumed 70% efficiency. Actual installation utilizes a fabric filter with 99.7% control efficiency on the cleaners and sizers. The published emission factor was modified by removing the cyclone control efficiency and applying the fabric filter control efficiency, provided an uncontrolled emission factor.

Uncontrolled Emission Factors

$$(0.075 \text{ lb PM/ton}) / (1 - 0.70) = 0.25 \text{ lb PM/ton}$$

$$(0.019 \text{ lb PM10/ton}) / (1 - 0.70) = 0.064 \text{ lb PM10/ton}$$

Hourly Emission Rate Calculation:

$$(6.85 \text{ tons/hr}) * (1 - 0.997) * (0.25 \text{ lb/ton}) = 0.005 \text{ lb/hr PM}$$

$$(6.85 \text{ tons/hr}) * (1 - 0.997) * (0.064 \text{ lb/ton}) = 0.001 \text{ lb/hr PM10}$$

Annual Emission Rate Calculation:

$$(60,000 \text{ tons/yr}) * (1 - 0.997) * (0.25 \text{ lb/ton}) * (1 \text{ ton}/2000 \text{ lb}) = 0.023 \text{ tons/yr PM}$$

$$(60,000 \text{ tons/yr}) * (1 - 0.997) * (0.064 \text{ lb/ton}) * (1 \text{ ton}/2000 \text{ lb}) = 0.006 \text{ tons/yr PM10}$$

EP-5: CLEAN SEED TO STORAGE

Annual Throughput = 60,000 tons/yr

Hourly Rate = 6.85 tons/hr

Headhouse and Internal Handling Emission Factor = 0.061 lb PM/ton

0.034 lb PM10/ton

Assumption: Emission factors are uncontrolled (AP-42; Table 9.9.1-1). Clean Seed to Storage equipment is controlled by a fabric filter with 99.7% control efficiency.

Hourly Emission Rate Calculation:

$(6.85 \text{ tons/hr}) * (1 - 0.997) * (0.061 \text{ lb/ton}) = 0.001 \text{ lb/hr PM}$

$(6.85 \text{ tons/hr}) * (1 - 0.997) * (0.034 \text{ lb/ton}) = 0.001 \text{ lb/hr PM10}$

Annual Emission Rate Calculation:

$(60,000 \text{ tons/yr}) * (1 - 0.997) * (0.061 \text{ lb/ton}) * (1 \text{ ton}/2000 \text{ lb}) = 0.005 \text{ tons/yr PM}$

$(60,000 \text{ tons/yr}) * (1 - 0.997) * (0.034 \text{ lb/ton}) * (1 \text{ ton}/2000 \text{ lb}) = 0.003 \text{ tons/yr PM10}$

EP-6: CLEAN SEED TO LOADOUT

Annual Throughput = 60,000 tons/yr

Hourly Rate = 6.85 tons/hr

Grain Shipping - Truck Emission Factor = 0.086 lb PM/ton
0.029 lb PM10/ton

Assumption: Emission factors are uncontrolled (AP-42; Table 9.9.1-1). Clean Seed Loadout equipment is controlled by a fabric filter with 99.7% control efficiency.

Hourly Emission Rate Calculation:

$$(6.85 \text{ tons/hr}) * (1 - 0.997) * (0.086 \text{ lb/ton}) = 0.002 \text{ lb/hr PM}$$

$$(6.85 \text{ tons/hr}) * (1 - 0.997) * (0.029 \text{ lb/ton}) = 0.001 \text{ lb/hr PM10}$$

Annual Emission Rate Calculation:

$$(60,000 \text{ tons/yr}) * (1 - 0.997) * (0.086 \text{ lb/ton}) * (1 \text{ ton}/2000 \text{ lb}) = 0.008 \text{ tons/yr PM}$$

$$(60,000 \text{ tons/yr}) * (1 - 0.997) * (0.029 \text{ lb/ton}) * (1 \text{ ton}/2000 \text{ lb}) = 0.003 \text{ tons/yr PM10}$$

APPENDIX B

Toxic Analysis Conclusion

From: MIKE DUBOIS
To: ZUNDEL, CAROLE
Date: 1/7/05 9:49AM
Subject: Busch Ag Screen 3 model

Carole,

I ran a conservative SCREEN 3 model using a 3 meter stack height and 1 meter stack diameter at 0.001 meters/second. I came up with 176.3 ug/m3 at 94 meters using a 1.0 lb/hr emission rate. Obviously, taking into consideration the 3.75E-08 actual emission rate and 0.4 persistence factor, it is unlikely that actual concentrations of metalaxyl and tebuconazole could exceed the mg/m3 RfC values I gave you earlier. There is no reason to further evaluate or place emission limits on either of those compounds for permitting purposes. I've attached the SCREEN 3 output file for your records and put a hardcopy in your office. Let me know if you need anything else.

Michael DuBois
Air Toxics Analyst
Idaho Department of Environmental Quality
1410 North Hilton
Boise, 83706

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CC: PITMAN, DANIEL; SCHILLING, KEVIN

APPENDIX C

AIRS Form

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: Busch Agricultural Resources
Facility Location: 3421 E. County Line Road, Idaho Falls
AIRS Number: 051-00015

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION
								A-Attainment U-Unclassified N- Nonattainment
SO ₂	B							U
NO _x	B							U
CO	B							U
PM ₁₀	SM							U
PT (Particulate)	SM							U
VOC	B							U
THAP (Total HAPs)	B							
APPLICABLE SUBPART								

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).