

TITLE OPERTING PERMIT NO. 00083-01TV

***PERMIT RENEWAL APPLICATION
EVALUATION AND REGULATORY REVIEW***

**CARRIER CORPORATION – Collierville Plant
Source No. 00083**

December 2020

**SHELBY COUNTY HEALTH DEPARTMENT
AIR POLLUTION CONTROL SECTION
MAJOR SOURCES BRANCH**

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***PERMIT RENEWAL APPLICATION
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Introduction

This narrative was prepared to assist the reviewer in understanding the facility and sources being permitted, and the content, the regulatory basis, and decisions made in preparing this modification. This document was also prepared to meet the requirements for the statement of basis in 40 CFR § 70.7(a)(5). This document will become a part of the permanent facility record maintained by the Pollution Control Section of the Shelby County Health Department.

I. SOURCE INFORMATION

Facility Name: Carrier Corporation - Collierville Plant
Facility Address: 97 South Byhalia Road
Collierville, TN 38017

Facility Mailing Address: Same as above

Facility Owner: Carrier Corporation
Owner Address: Same as above

Responsible Official: Steven Youngblood, Plant Manager - (901) 854-3000
Responsible Official Address: Same as above

Billing Contact: Amy McCaffery, EHS Specialist - (901) 854-5318
Billing Address: Same as above

Technical Contacts: Amy McCaffery, EHS Specialist - (901) 854-5318
Ryan K. Adamson, P.E., EHS Manager - (901) 854-3131
Technical Contact Address: Same as above

Owner's Registered Agent: CT Corporation System
Registered Agent's Address: 800 S. Gay Street
Suite 2021
Knoxville, TN 37929-9710
Reg. Agent Telephone Number: (423) 687-3113

Facility's Primary Activity: Manufacture of refrigeration and heating equipment

NAICS (Code(s)): 333415

Existing Permits (Expiration): 00083-01TV(R) (Expires June 21, 2021)

II. APPLICATION INFORMATION

Application Received: December 21, 2020 (Renewal)
Application Dated: December 17, 2020 (Renewal)

Completeness Determination: Defaulted (Streamlined application with no changes from current permit)

Public Notice: March 2, 2021
Surrounding States Notice: PENDING
Public Hearing: PENDING
Comments Received: PENDING

To EPA for Review: PENDING
EPA Comments: PENDING

Title V Operating Permit

Initial Permit Issue Date: June 1, 1998
Renewal Issue Date: PENDING

Permit engineer: Gregg P. Fortunato

Facility classification:

- Major-PSD
- Major-Title V
- NSPS Federal (*40 CFR Part 60, Subparts Dc and IIII*) (*None applicable to this permit action*)
- NSPS Local
- NESHAP (*40 CFR Part 61*)
- NESHAP/MACT (*40 CFR Part 63, Subpart ZZZZ - Area Source NESHAP for RICE*)
- LAER/BACT/RACT

Type of permit:

- New Construction
- Title V Operating
- Synthetic Minor
 - Unrestricted PTE above major source threshold (>100 tpy) for criteria pollutant(s)
 - Unrestricted PTE above major source threshold (>10 tpy) for a single HAP
 - Unrestricted PTE above major source threshold (>25 tpy) for combined HAPs
- Modification
 - Major modification
 - Minor Modification
- Amendment
- Permit Renewal

Emission change:

- Emissions increase
- Emissions decrease
- Emissions the same

III. SPECIFIC REASON for APPLICATION

Carrier Corporation - Collierville Plant (Carrier) has submitted a streamlined Title V operating permit renewal application with no changes from existing permit conditions and no changes in emission limits.

IV. EMISSION UNITS, POINTS and CONTROLS

Table 1 – Emission Units and Source Identification

Emission Unit No.	Emission Group No.	Source Identification	Description	Date Installed ¹
1 and 2 ²	Not Applicable (NA)	B-3 (Permanently out of service and removed from permit)	Old Washer Line Natural gas-fired 12.5 MM Btu/hr boiler	NA
3 - 6	1	Paint Booths 1 - 4 (Lines 1 - 4)	Robotic paint booths for copper plate fin condenser coils	2007
7	1	Fin Presses	42 plate fin presses	2005
8	5	North Remediation System	Soil vapor extraction and stripping towers	1991
9	6	Central Remediation System	Soil vapor extraction	1995
10	NA	Paint Stripping Process (Permanently out of service and removed from permit)	Molten salt bath with natural gas-fired burners and two heated quench	2005
11 ³	1	Paint Booth 5 (Line 5)	Robotic paint booth for plate fin coils	2007
12 ⁴	2	Hot Water Boiler - New Washer Line (B-4)	New Washer Line – Natural gas-fired three-staged hot water 11.5 MM Btu/hr boiler	2005
13 ⁵	2	Powder Coating – Lines 3 and 4	Natural gas-fired dry oven (3.85 MM Btu/hr)	2005
14 ⁵	2	Powder Coating – Lines 3 and 4	Natural gas-fired cure oven (5.175 MM Btu/hr)	2005
15 ⁵	2	Powder Coating – Lines 3 and 4	Natural gas-fired cure oven (5.175 MM Btu/hr)	2005
16	NA	Powder Coating – Line 1 and 2 (Permanently out of service and removed from permit)	Natural gas-fired dry oven (3.5 MM Btu/hr)	NA
17	NA		Natural gas-fired dry oven (3.5 MM Btu/hr)	NA
18	NA		Natural gas-fired cure oven (4.0 MM Btu/hr)	NA
19	NA		Natural gas-fired cure oven (3.5 MM Btu/hr)	NA
20 ⁶	4	De-oiler System (Thermal Cleaner)	Burn off oven/degreaser for removing oil residue from aluminum plate fin coils. Includes an 8.0 MM Btu/hr natural gas-fired thermal cleaner for burn off vapors. The thermal cleaner is also the heat source for the burn off oven/degreaser.	2013
21 ⁷	3	Fluidized Bed Parts Cleaner (Coating removal from powder coating conveyance hangers)	3.78 MM Btu/hr natural gas-fired fluidized sand bed parts cleaner with an integrated process heater/afterburner exhausting through a cyclone	2015
22 and 23	7	Emergency Engines	462 HP emergency generator (eg) and 132 HP emergency fire pump (fp) engine	2005 (eg) 2015 (fp)
24 ⁸	1	Paint Booth 8 (Line 8)	Robotic paint booth for aluminum plate fin condenser coils	See footnote 8
25 - 31 ³	1	Paint Booths 9 - 15 (Lines 9 - 15)	Robotic paint booth for plate fin condenser coils	See footnote 3

¹ Date installed or last reconstructed/modified.

² Boiler B-3 replaced boilers 1 and 2 within the original Title V permit, but has since been decommissioned.

³ Booths 1 - 5 paint copper condenser coils and Booth 8 paints aluminum condenser coils. Aluminum coil Paint Booths 9 - 15 (Emission Units 25 - 31) will be constructed and copper coil paint booths will be decommissioned subsequently until only eight (8) aluminum coil paint booths remain (Paint Booths 8 – 15). No more than a total of nine (9) paint booths (aluminum and copper coil) will be operational at any time during this project that is expected to be completed by the end of 2023.

⁴ Construction Permit No. 00083-22PC; Pending incorporation into Title V Operating Permit No. 00083-01TV.

⁵ Construction Permit No. 00083-21PC; Pending incorporation into Title V Operating Permit No. 00083-01TV.

⁶ Construction Permit No. 00083-23PC; Pending incorporation into Title V Operating Permit No. 00083-01TV.

⁷ Construction Permit No. 00083-24PC; Pending incorporation into Title V Operating Permit No. 00083-01TV.

⁸ Paint Booth No. 8 became available for production activities in March 2020. This booth was previously only for research and development activities.

Table 2 – Emission Points and Controls

Emission Point (Stack ID)	Emission Point Description	Emission Unit No.	Emissions	Controls
PB Line 1-5	Paint booth exhaust (Lines 1-5)	3-6 and 11	PM, VOC and HAP	Paint Filter
PB Line 8	Paint booth exhaust – Line 8	24	PM, VOC and HAP	Paint Filter
PB Line 9-15	Paint booth exhaust (Lines 9-15)	25 - 31	PM, VOC and HAP	Paint Filter
Various	Building vents and openings from plate fin presses	7	VOC	None
1-115-00-RS-050	North remediation system stripper - tower exhaust	8	VOC and HAP	None
1-114-00-RS-049	Central remediation system exhaust	9	VOC and HAP	Carbon Adsorption
Boiler 4 (Stacks A and B)	Boiler 4 with two identical stacks	12	PM, SO ₂ , NO _x , CO and VOC	None
Dry Oven 1	Powder Coating - Lines 3 and 4 dry oven exhaust	13	PM, SO ₂ , NO _x , CO and VOC	None
Cure Oven 3	Powder Coating - Line 3 cure oven exhaust	14	PM, SO ₂ , NO _x , CO and VOC	None
Cure Oven 4	Powder Coating - Line 4 cure oven exhaust	15	PM, SO ₂ , NO _x , CO and VOC	None
De-Oiler System (Thermal Cleaner)	De-Oiler System with 8 MM Btu/hr natural gas fired thermal cleaner/oxidizer exhaust	20	PM, SO ₂ , NO _x , CO and VOC	None
Fluidized Bed (EP-21)	Fluidized bed parts cleaner cyclone exhaust	21	PM, SO ₂ , NO _x , CO and VOC	Cyclone and Afterburner
Emergency Engines	462 HP emergency generator and 132 HP emergency fire pump engine	22 and 23	PM, SO ₂ , NO _x , CO and VOC	None

V. PROCESS DESCRIPTION

Carrier is located on a 145 acre site on the western side of the town of Collierville in the southeast portion of Shelby County. The Company is a manufacturer and assembler of residential air conditioners and heat pumps. The main manufacturing plant consists of the following areas:

5.1 Plate Fin Coil Shop

The plate fin coil shop includes the plate fin coil fabrication processes (fin presses, tube sheet presses, tube expanders, hairpin benders, autobrazers, and paint booths)

- Plate Fin Fabrication (Emission Unit 7):

In these processes, aluminum sheets enter the plate fin fabrication presses. There are 42 plate fin presses permitted (only 31 currently in operation) within Emission Unit 7.

Evaporative lubricants are used in the fin presses. Copper tubing from the hairpin benders is laced into the fabricated aluminum fins. The bottom and top tube sheets are fabricated in the tube sheet presses and installed before the expansion process.

The tubing is expanded to secure the aluminum fins. The term “expansion process” is misleading as metal rods are placed inside the tubing to protect integrity and the product is then compressed. The rod is then removed and the finished product advances to the plate fin coil assembly process.

Carrier is transitioning from copper condenser coils to exclusively aluminum condenser coils in cooling units to reduce coil fabrication costs.

- Plate Fin Coil Assembly:

After the coils have been expanded in the plate fin coil fabrication process, they are placed onto an automated conveyor where aluminum or copper return bends are added to complete the coil circuit. The coils are then sent to an autobrazer. After each coil has been brazed, it is leak-tested. There are seven process coil lines.

- Robotic Paint Booths 1-5 and 8-15 (Emission Units 3-6, 11 and 24-31):

Depending on the model, the finished plate fin coils are coated at one of six robotic paint booths and are moved to the assembly lines for assembly.

In 2007 four (4) robotic paint booths (Emission Units 3 - 6) were installed based on a November 29, 2007 letter requesting operational flexibility to change the existing ten gun spray booths to robotic units. A fifth robotic paint booth (Paint Booth Line 5 - Emission Unit 11) was also constructed in 2007. Each of these five (5) paint booths are currently used to coat copper condenser coils.

In February 2020 Robotic Paint Booth Line 8 (Emission Unit 24) was converted from a research and development unit to a production unit for the coating of aluminum condenser coils (versus copper coils).

Aluminum coil Robotic Paint Booths 9 - 15 (Emission Units 25 - 31) will be constructed and copper coil paint booths will be decommissioned subsequently until only 8 aluminum coil paint booths remain. No more than a total of 9 paint booths will be operational at any time.

5.2 Assembly Line Area

The assembly line area consists of eight assembly lines that manufacture air conditioners and heat pumps. In this process, a compressor, coil and associated aluminum or copper tubing is installed into a base pan. After brazing and miscellaneous assembly operations, completed units are tested for structural integrity, charged with refrigerant, and retested for leaks. Units passing this initial testing undergo additional assembly prior to a final run test. After the run test, completed units are packaged and placed in finished goods inventory. Refrigerant is recovered and reclaimed from units that fail the leak test or run test. Each assembly line operates independently.

5.3 Zinc Phosphate Washers and Associated Boilers

The zinc phosphate washer system at this facility is used to clean the manufactured parts prior to powder coating. An 11.5 MMBtu/hr natural gas-fired boiler (Emission Unit 12) is used for the “new washer line” that services powder coating lines 3 and 4.

The “old washer line” that serviced powder coating lines 1 and 2, including an associated 12.5 MMBtu/hr natural gas-fired boiler (Emission Unit 1), is permanently out of service and has been removed from the permit.

5.4 Powder Coating Process

The powder coating process coats parts prior to final assembly. This process consists of two powder coat paint booths (Lines 3 and 4), which include two associated natural gas-fired cure ovens (Emission Units 14 and 15) and a shared natural gas-fired dry oven (Emission Unit 13).

Powder coating lines 1 and 2 and all associated ovens (Emission Units 16-19) are permanently out of service and have been removed from the permit.

5.5 Remediation Systems

The facility has two active remediation systems on site. These sites are known as the North Remediation System (Emission Unit 8) and the Central Remediation System (Emission Unit 9).

The North Remediation System has a soil vapor extraction unit and two groundwater stripping towers. The Central Remediation System includes a soil vapor extraction unit with two carbon absorption beds. Trichloroethylene (the site contaminant) and its breakdown products are actively being abated at the site.

5.6 De-Oiler System (Thermal Cleaner)

The de-oiler system is used to burn off aluminum tubing expansion lubricant precoat residue in the plate fin coil fabrication process. This is not necessary when using copper tubing.

The de-oiler system, designated as Emission Unit 20, includes an 8.0 MM Btu/hr natural gas-fired thermal cleaner (oxidizer) for cleaning burn off vapors (smoke reduction). Heat from the thermal cleaner is also used to heat the burn off oven.

The majority of VOCs associated with fin coil manufacturing flash off prior to the thermal cleaner and is accounted for within plate fin press operation. It is assumed that 100% of the plate fin lubricant oil VOC content is emitted and that precoated aluminum tubing has a minimal VOC content because it is coated off site.

The de-oiler thermal cleaner operates with a residence time of 1.0 second at a minimum temperature of 1,400°F; resulting in an actual destruction efficiency of $\geq 95\%$. Process feed is interlocked with the thermal cleaner minimum operating temperature.

5.7 Fluidized Bed Parts Cleaner

The natural gas-fired fluidized sand bed parts cleaner (Emission Unit No. 21) includes an integrated process heater/afterburner (process device operating at 800°F) and a secondary afterburner (emission control device operating at 1,450°F) that exhaust through a cyclone. The overall process VOC emission reduction efficiency based on manufacturer supplied data is 99.1%.

This process is used for the cleaning of powder coating process residue from hangers that convey manufactured parts through the powder coating process. A typical batch cleaning cycle is one hour in duration.

5.8 Other

Other areas of the plant include the wastewater treatment systems, the air compressor room, a battery charging (forklifts) area, and a storage area.

Outside the plant, there are chemical storage tanks for refrigerants, evaporative lubricants, LPG, diesel fuel, oxygen, nitrogen and gasoline.

A second building houses the maintenance shop and the tool and die shop.

VI. REGULATORY ANALYSIS (See Appendix A for a full regulatory applicability overview)

6.1 New Source Review (NSR/PSD)

6.1.1 Non-attainment New Source Review (NSR):

The United States Environmental Protection Agency designated Shelby County as in attainment of the national ambient air quality standard for ozone within the Federal Register (effective July 25, 2016). Shelby County is in attainment for all NSR pollutants at this time; therefore, NSR is not applicable to this permit action.

6.1.2 Prevention of Significant Deterioration of Ambient Air Quality (PSD)

Under PSD an affected source is a facility with emissions exceeding 250 tons per year of any regulated NSR pollutants or emissions exceeding 100 tons per year of any regulated NSR pollutants at sources in specific categories.

This facility has a federally allowable emission limit for VOCs of 231.8 tons per year; therefore, PSD review is not applicable.

6.2 New Source Performance Standards (NSPS) - 40 CFR Part 60

6.2.1 Subpart A - General Provisions:

NSPS general provisions are applicable.

6.2.2 Subpart Dc - Small Industrial-Commercial-Institutional Steam Generating Units

This subpart affects facilities that are steam generating units with a maximum design heat input capacity equal to or greater than 10 MM Btu/hr but less than or equal to 100 MMBtu/hr and for which construction is commenced after June 9, 1989. Boiler B-4 (Emission Unit 12) is subject to this subpart.

- §60.42c(d) - Standard for sulfur dioxide (SO₂):

No owner or operator of an affected facility shall cause to be discharged into the atmosphere from the affected facility, any gases that contain SO₂ in excess of 0.50 lb/MM Btu; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur.

The requirements of this section are not applicable to the facility because fuel usage is restricted to natural gas.

- §60.43c - Standard for particulate matter (PM):

No owner or operator of an affected facility that combusts coal, wood, or oil and has a heat input capacity of 30 MM Btu/hr or greater shall cause to be discharged into the atmosphere from the affected facility any gases that exhibit greater than 20 percent opacity (6-minute average), except one 6-minute period per hour of not more than 27

percent opacity. The PM standards under this section apply at all times, except during periods of start-up, shutdown, or malfunction.

The requirements of this section are not applicable to the facility because fuel usage is restricted to natural gas.

- §60.44c - Compliance and performance test methods and procedures for SO₂:

The requirements of this section are not applicable to Carrier because it is associated with fuel oil usage and this facility restricted to the use of natural gas.

- §60.46c - Emission Monitoring for SO₂:

If a fuel switch is considered in the future, even for emergency purposes, compliance with the SO₂ standards would be based on continuous emission monitoring requirements within this section or be based on fuel supplier certification.

The requirements of this section are not applicable to the facility since this facility is restricted to the use of natural gas.

- §60.47c - Emission Monitoring for PM:

This section affects only coal, residual oil, or wood combusting facilities and is not applicable to this facility.

- §60.48c – Reporting and recordkeeping requirements

The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

Since the facility will be permitted to burn only natural gas, the Department will allow monthly recordkeeping. This is based on a letter in EPA’s Applicability Determinations Index from R. Douglass Neely of Region IV to Rob Rainey of the Metro Health Department in Davidson County Tennessee and dated December 7, 2000.

In that letter, Mr. Neely stated the following:

“On previous occasions, the U.S. Environmental Protection Agency (EPA) has approved changes in the fuel usage recordkeeping frequency for Subpart Dc boilers that are fired only with natural gas and/or low sulfur oil. The basis for these approvals is that, although records must be kept to verify the types of fuel combusted, compliance can be adequately verified by keeping fuel usage records on a monthly basis if only natural gas and/or low sulfur oil are burned.”

6.2.3 Subpart SS - Industrial Surface Coating: Large Appliances (Also see Town of Collierville, Code Section 96.02 [Reference Rules and Regulations of Tennessee, Rule 1200-3-16-.36]

The provisions of this subpart apply to each surface coating operation in a large appliance surface coating line.

§60.451(a) and Rule 1200-3-16-.36(2)(a)4 define a “*large appliance surface coating line*” as “that portion of a large appliance assembly plant engaged in the application and curing of organic surface coatings on large appliance parts or products”.

§60.451(a) and Rule 1200-3-16-.36(2)(a)2 define a “*large appliance part*” as “any organic surface-coated metal lid, door, casing, panel, or other interior or exterior metal part or accessory that is assembled to form a large appliance product. Parts subject to in-use temperatures in excess of 250 °F are not included in this definition”.

§60.451(a) and Rule 1200-3-16-.36(2)(a)3 define a “*large appliance product*” as “any organic surface-coated metal range, oven, microwave oven, refrigerator, freezer, washer, dryer, dishwasher, water heater, or trash compactor manufactured for household, commercial, or recreational use”.

The air conditioners manufactured at this facility are not on the list of large appliance products; therefore, this standard is not applicable.

6.2.4 Subpart IIII - Stationary Compression Ignition Internal Combustion Engines

The 132 HP emergency fire pump engine at this facility is subject to this Subpart.

6.3 National Emission Standards for Hazardous Air Pollutants (NESHAP) - 40 CFR Part 61

None of the 7 hazardous air contaminants regulated by this part are emitted at this facility.

6.4 NESHAP - 40 CFR Part 63

6.4.1 Subpart NNNN - Surface Coating of Large Appliances

Robotic paint booth lines 1 – 5 and 8 (Emission Units 3 - 6, 11 and 24) were categorized by this rule, but are no longer subject based on the January 25, 2018 EPA guidance memorandum that reversed the “once in, always in” policy, allowing facilities to accept federally enforceable HAP emissions limits to avoid major source obligations at any time.

Carrier demonstrated that this facility was no longer a major source of HAPs in their Title V permit renewal application; dated April 13, 2009. Federally enforceable facility-wide HAP limits were incorporated into the permit renewal on June 21, 2016.

6.4.2 Subpart ZZZZ - Reciprocating Internal Combustion Engines (RICE)

The 462 HP emergency generator and 132 HP emergency fire pump engine at this facility are both subject to this Subpart.

6.4.3 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters Major Sources)

The boiler and process heaters at this facility this Carrier facility are categorized but not subject to this subpart. Carrier demonstrated that this facility was no longer a major source of HAPs in their Title V permit renewal application, dated April 13, 2009. This final rule was published in the Federal Register on March 21, 2011.

6.4.4 Subpart JJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers (Area Sources)

The boiler at this Carrier facility is not subject to this area source NESHAP pursuant to §63.11195(e), which exempts gas-fired boilers as defined in subpart JJJJJ.

A gas-fired boiler, as defined under §63.11237, includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

6.5 Greenhouse Gas (GHG) (40 CFR Parts 51, 52, 70, 71 and 98)

The heating capacity of all natural gas combustion sources at this Carrier facility totals 37.48 MM Btu/hr. Maximum potential CO₂e from these fuel burning sources, calculated using the USEPA GHG Calculator and assuming 1,000 Btu per cubic foot of natural gas (~328.325 MM ft³/yr), is ~17,911 metric tonnes and ~19,744 U.S. tons per year.

- 40 CFR Parts 51, 52, 70, and 71

The GHG Tailoring Rule sets the CO₂e threshold for both Title V permitting and PSD applicability at 100,000 tons per year. The Rule also sets the major modification threshold for PSD at 75,000 tons per year. These parts are not applicable to this Carrier facility because potential CO₂e emissions are less than 100,000 tons annually.

- U.S. Supreme Court Decision in *Utility Air Regulatory Group v. EPA*

On June 23, 2014, the U.S. Supreme Court issued its decision in *Utility Air Regulatory Group v. EPA* (No. 12-1146). The Court said that EPA may not treat greenhouse gases as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or title V permit.

The Court also said that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on greenhouse gases emissions based on the application of Best Available Control Technology (BACT).

- Mandatory Greenhouse Gas Reporting (40 CFR Part 98)

Carrier has a potential to emit CO₂e below the annual 25,000 metric tonnes applicability threshold within this rule; therefore, Carrier is not required to report.

6.6 ODS (40 CFR Part 82)

Carrier Corporation has air conditioners and/or refrigeration equipment that uses ozone depleting substances (ODS). The charge in some of the equipment does exceed 50.0 lbs. Facility personnel do not maintain, service, repair, and/or dispose of motor vehicle air conditioners. Generic permit language requirements will be included in the permit in accordance with EPA guidance.

6.7 Other Requirements (includes SIP)

6.7.1 Volatile Organic Compounds

(Town of Collierville Code Section 96.02 [Reference Rules and Regulations of Tennessee, Rule 1200-3-18])

- Rule 1200-3-18-.18 - Surface Coating of Large Appliances:

This regulation is applicable to any large appliance coating line.

Paragraph 1200-3-18-.18(2)(a) states “Large appliance means any residential or commercial washer, dryer, range, refrigerator, freezer, water heater, dishwasher, trash compactor, air conditioner, or other similar products under Standard Industrial Classification Code 363.”

Paragraph 1200-3-18-.18(2)(b) states “Large appliance coating line means a coating line in which any protective, decorative, or functional coating is put onto the surface of component metal parts (including, but not limited to, doors, cases, lids, panels, and interior parts) of large appliances.”

Based on these definitions, robotic paint booth lines 1 – 5 and 8 (Emission Units 3-6, 11 and 24) and fin press operations (Emission Unit 7) are subject to the requirements of this rule.

1200-3-18-.18(3); Standards as follow apply:

- (a) No owner or operator of a large appliance coating line subject to this rule shall cause, allow, or permit the application of any coating on that operation with VOC content in excess of 0.34 kilograms per liter (kg/l) (2.8 pounds per gallon [lbs/gal]) of coating, excluding water and/or exempt compounds, as applied.
- (b) As an alternative to compliance with the emission limit in Subparagraph (a) of this paragraph, an owner or operator of a large appliance coating line subject to this rule may meet the requirements of Paragraph (4) (Daily weighted average VOC content) or (5) (Use of control equipment) of this rule.

Carrier utilizes compliant coatings as the basis for compliance with this rule as follows:

- ✓ Robotic paint booth lines 1 – 5 and 8 (Emission Units 3 - 6, 11 and 24) currently utilize “Valspar PL 132 Aquaspar Low VOC Black”, which contains 0.49 lbs VOC/gal [Reference Valspar Environmental Data Sheet, Revised May 16, 2014].
- ✓ Fin press operations (Emission Unit 7) utilize “Arrow 5698 FRM Fin Stamp Lubricant”, which contains 1.064 lbs VOC/gal and no HAPs [Reference Chem Arrow Material Safety Data Sheet, Revised March 2007].

- Rule 1200-3-18-.79 - Other facilities that emit VOCs of 100 tons per year:

Paragraph 1200-3-18-.79(1)(a) of this rule states: “This rule applies to any facility in Davidson, Rutherford, Shelby, Sumner, Williamson, or Wilson County having sources that in the aggregate have potential VOC emissions of 100 tons or more per calendar year. In calculation to determine whether this applicability threshold is exceeded, potential VOC emissions are not included from handling, storage, use, and disposal of VOCs subject to the requirements of Rule -.06 of this chapter and from the sources as follow:

1. Any sources subject to standards in Rules 1200-3-18-.11 through 1200-3-18-.77 of this chapter;
2. Any sources subject to source-specific standards approved in lieu of standards in Rules 1200-3-18-.11 through 1200-3-18-.77 of this chapter; and
3. Any source, which are within the source categories listed in Subparagraph (c) of this paragraph.”

The six robotic paint booths and the fin presses at this facility account for the majority VOC emissions and are subject to Rule 1200-3-18-.18 (Surface Coating of Large Appliances). The total permitted amount of VOC emissions from this facility minus the VOC emissions from the robotic paint booths and fin presses is significantly less than the 100 tpy threshold for this rule; therefore, the remaining VOC emission sources at this Carrier facility are not subject to this rule.

VII. POTENTIAL TO EMIT (PTE) EVALUATION

7.1 VOC

Carrier is considered a Title V major source due to VOC emissions. The majority of VOC emissions are associated with plate fin coil fabrication, which includes fin press stamping lubricant usage and the 8 robotic paint booth lines. Permitted limits are based on maximum throughput (42 presses) and it is assumed 100% of available VOCs are emitted.

Sources of VOC emissions are as follows:

- ✓ Fin Press Stamping (162.0 tpy)
- ✓ 8 robotic paint booth lines (48.0 tpy)
- ✓ De-oiler system (15.1 tpy)
- ✓ Groundwater Remediation Systems (5.0 tpy)
- ✓ All natural-gas fired combustion sources, excluding the Fluidized Bed Parts Cleaner (0.88 tpy)
- ✓ The Fluidized Bed Parts Cleaner is limited to 0.88 tpy VOC, which assumes maximum potential throughput and a combined 99.1% VOC emission reduction efficiency from the integrated process heater/afterburner (800°F) and secondary emission control afterburner (1,450°F). Maximum potential VOC emissions from this process assuming no controls is 97.8 tpy

The facility-wide PTE for VOCs is therefore 328.7 tpy. The facility-wide federally enforceable permitted VOC limit is 231.8 tpy..

7.2 NO_x, CO, SO₂ and PM

The PTE of NO_x, CO, SO₂ and PM is calculated based on the total heat input of all the natural gas-fired combustion units at this facility (except the fluidized bed parts cleaner), using EPA's Compilation of Air Pollutant Emission Factors, AP-42, 5th Edition, Section 1.4, 8,760 hours per year and 1,000 Btu per cubic foot of natural gas. The fluidized bed parts cleaner PTE for these pollutants (except SO₂) is based on vendor data.

Natural gas-fired combustion units located at this facility are listed within the following table.

Table 3 – Natural Gas Combustion Sources

Emission Unit (EU)	Fuel Burning Source Description	Heat Input Capacity
EU-12	Boiler B-4 ("New Washer Line" servicing Powder Coating Lines 3 and 4)	11.5 MM Btu/hr
EU-13	Powder Coating Lines 3 and 4 Dry Oven	3.85 MM Btu/hr
EU-14	Powder Coating Lines 3 and 4 Cure Oven	5.175 MM Btu/hr
EU-15	Powder Coating Lines 3 and 4 Cure Oven	5.175 MM Btu/hr
EU-20	De-Oiler System thermal cleaner burner	8.0 MM Btu/hr
EU-21	Fluidized bed parts cleaner with integrated process heater/afterburner	3.78 MM Btu/hr
TOTAL:		37.48 MM Btu/hr

Based on a total of 37.48 MM Btu/hr (~321.9 MM ft³ of natural gas @ 1,020 btu/ ft³), the PTE for all natural gas-fired units combined, except the fluidized bed parts cleaner, are as follows:

Table 4

AP-42 Emission Factors (<100 MM Btu/hr)			Maximum (PTE) Annual Emissions		
TSP	7.6	lbs/MMscf	TSP	1.22	tpy
SO ₂	0.6	lbs/MMscf	SO ₂	0.1	tpy
NO _x	100	lbs/MMscf	NO _x	16.09	tpy
CO	84	lbs/MMscf	CO	13.52	tpy
VOC	5.5	lbs/MMscf	VOC	0.89	tpy

Emissions from the fluidized bed parts cleaner are as follows:

Table 5

Vendor Data for Fluidized Bed Parts Cleaner			Maximum (PTE) Annual Emissions		
TSP	< 1.13 ¹	lbs/hr	TSP	4.95	tpy
SO ₂	<i>Not provided by vendor but expected to be negligible</i>		SO ₂ ²	<0.1	tpy
NO _x	< 3.00	lbs/hr	NO _x	13.14	tpy
CO	< 0.55	lbs/hr	CO	2.41	tpy

¹ Cyclone controlled rate of <1.13 lbs/hr

² Based on AP-42 Emission Factor (0.6 lbs/MM cu.ft.)

Combined total PTE for the facility (excluding the emergency generator and fire pump engine) is as follows:

Table 6

Pollutant	Facility-Wide PTE (tpy) ¹	Facility-Wide Allowable Emissions (tpy) ¹
TSP	6.1	6.1
SO ₂	0.2	0.2
NO _x	27.9	27.9
CO	14.8	14.8
VOC	328.7	231.8

¹Excludes the emergency generator and fire pump engine.

7.3 Greenhouse Gases (GHGs)

The heating capacity of all existing natural gas combustion sources at this Carrier, including the new fluidized bed, totals 37.48 MM Btu/hr. Maximum potential CO₂e from these fuel burning sources, calculated using the USEPA GHG Calculator and assuming 1,020 Btu per cubic foot of natural gas (~321.9 MM ft³/yr), is ~17,542 metric tonnes and ~19,337 U.S. tons per year.

VIII. FEES

The following fees apply to this permit action:

- 1) Publication Fee: \$250.00

APPENDIX A

Regulatory Applicability Overview Table

Carrier Corporation

(Title V Operating Permit No. 00083-01TV(R))

State and Local Applicable Requirements Overview

(March 19, 2020)

TDEC/Shelby/Memphis/Collierville	Description	Applicable Req.	Notes
CHAPTER 1200-3-2(3-1A)(16-46)(96.02)	DEFINITIONS		
1200-3-2-.01	General Definitions	Not Applicable (NA)	Defines terms used in chapter
1200-3-2-.02	Abbreviations	NA	
CHAPTER 1200-3-3(3-6)(16-49)(96.02)	AMBIENT AIR QUALITY STANDARDS		
1200-3-3-.01	Primary Air Quality Standard	Yes	Contains general requirements
1200-3-3-.02	Secondary Air Quality Standard	Yes	Contains general requirements
1200-3-3-.03	Tennessee's Ambient Air Quality Standard	Yes	Contains general requirements
1200-3-3-.04	Nondegradation Standard	Yes	Contains general requirements
CHAPTER 1200-3-5(3-17)(16-83)(96.02)	VISIBLE EMISSIONS		
1200-3-5-.01	General Standards	Yes	Contains specific requirements applicable to facility-wide.
1200-3-5-.02	Exceptions	Yes	Contains general requirements
1200-3-5-.03	Method of Recording	Yes	Contains specific requirements applicable to facility-wide.
1200-3-5-.04	Exemption	Yes	Contains specific requirements applicable to facility-wide.
CHAPTER 1200-3-6(3-21)(16-79)(96.02)	NON-PROCESS EMISSION STANDARDS (PM)		
1200-3-6-.01	General Non-Process Emissions	Yes	
1200-3-6-.02	Non-Process Particulate Emission Standards	Yes	Combustion gases from the burners associated with the De-oiler (EU-20) and the new Fluidized Bed Parts Cleaner (EU-21) are comingled with process emissions and are therefore subject to the process emission standards. Boiler B-4 (EU-12) and Powder Coating Ovens (EU-13 through 15) are subject to this standard.
CHAPTER 1200-3-7(3-20)(16-78)(96.02)	PROCESS EMISSION STANDARDS (PM)		
1200-3-7-.01	General Process Particulate Emission Standards	Yes	Contains general requirements
1200-3-7-.03	New Processes	Yes	Contains specific requirements applicable to EU-3 through 9, EU-11, EU-20, EU-21 and EU-24.
1200-3-7-.04	Limiting Allowable Emissions	Yes	Contains specific requirements applicable to EU-3 through 9, EU-11, EU-20, EU-21 and EU-24.
CHAPTER 1200-3-9(3-5)(16-77)(96.02)	CONSTRUCTION AND OPERATING PERMITS		
1200-3-9-.01	Construction Permits	Yes	Contains general requirements

1200-3-9-.02	Operating Permits	Yes	Contains general requirements
1200-3-9-.03	General Provisions	Yes	Contains general requirements
1200-3-9-.04	Exemptions	Yes	Contains general requirements
1200-3-9-.05	Appeal of Permit Application Denials and Permit Conditions	Yes	Contains general requirements
CHAPTER 1200-3-10(3-7)(16-85)(96.02)	REQUIRED SAMPLING, RECORDING, AND REPORTING		
1200-3-10-.01	Sampling Required to Establish Air Contaminant Emissions Levels	Yes	Contains general requirements
1200-3-10-.02	Monitoring of Source Emissions, Recording and Reporting of Same are Required	Yes	Contains general requirements
1200-3-10-.04	Sampling, Recording and Reporting Required for Major Stationary Sources	Yes	Contains general requirements
CHAPTER 1200-3-11(3-25)(16-81)(96.02)	HAZARDOUS AIR CONTAMINANTS	NA	
CHAPTER 1200-3-12(3-8)(16-86)(96.02)	METHODS OF SAMPLING AND ANALYSIS		
1200-3-12.01	General	Yes	Contains general requirements
1200-3-12-.02	Procedures for Ambient Air Sampling and Analysis	Yes	Contains general requirements
1200-3-12-.03	Source Sampling and Analysis	Yes	Contains general requirements
CHAPTER 1200-3-15(3-14)(16-60)(96.02)	EMERGENCY EPISODE PLAN		
1200-3-15-.01 and .02	Purpose and Episode Criteria	Yes	Applicable for providing the definition of purpose and terms
1200-3-15-.03	Required Emissions Reduction	Yes	Contains general requirements
CHAPTER 1200-3-14(3-24)(16-82)(96.02)	SULFUR OXIDE EMISSIONS		
1200-3-14-.01	General Provisions	Yes	Contains general requirements
1200-3-14.02	Non-Process Emission Standards	Yes	Contains specific requirements applicable to Boiler B-4 (EU-12) and the Powder Coating Ovens (EU-13 through 15).
1200-3-14-.03	Process Emission Standards	Yes	Contains specific requirements applicable to the De-oiler (EU-20) and the Fluidized Bed Parts Cleaner (EU-21). SO ₂ emissions are only associated with the combustion of natural gas.
CHAPTER 1200-3-16(3-15)(16-76)(96.02)	NEW SOURCE PERFORMANCE STANDARDS	NA	
CHAPTER 1200-3-18(3-22)(16-80)(96.02)	VOLATILE ORGANIC COMPOUNDS		
1200-3-18-.01	Definitions	NA	Defines terms used in chapter
1200-3-18-.02	General Provisions and Applicability	Yes	Contains general requirements
1200-3-18-.03	Compliance Certification, Record Keeping, and Reporting Requirements for Coating and Printing Sources	Yes	Contains general requirements
1200-3-18-.06	Handling, Storage, and Disposal of Volatile Organic Compounds (VOCs)	Yes	Contains general requirements

1200-3-18-.18	Coating of Large Appliances	Yes	Contains specific requirements applicable to Robotic Paint Booth Lines 1 - 5 and 8 (EU-3 through 6, 11 and 24) and Fin Press Operations (EU-7).
1200-3-18-.80	Test Methods and Compliance Procedures: General Provisions	Yes	Contains general requirements applicable EU-3 through 7, 11 and 24.
1200-3-18-.81	Test Methods and Compliance Procedures: Determining the VOC Content of Coatings and Inks	Yes	Contains general requirements applicable EU-3 through 7, 11 and 24.
1200-3-18-.82	Test Methods and Compliance Procedures: Alternative Compliance Methods for Surface Coating	Yes	Contains general requirements applicable EU-3 through 7, 11 and 24.
1200-3-18-.83	Test Methods and Compliance Procedures: Emission Capture and Destruction of Removal Efficiency and Monitoring Requirements	Yes	Contains general requirements applicable EU-3 through 7, 11 and 24.
1200-3-18-.84	Test Methods and Compliance Procedures: Determining the Destruction or Removal Efficiency of a Control Device	Yes	Contains general requirements applicable EU-3 through 7, 11 and 24.
CHAPTER 1200-3-20(3-9)(16-87)(96.02)	LIMITS ON EMISSIONS DUE TO MALFUNCTIONS, STARTUPS, AND SHUTDOWNS		
1200-3-20-.02	Reasonable Measures Required	Yes	Contains general requirements
1200-3-20-.03	Notice Required When Malfunction Occurs	Yes	Contains general requirements
1200-3-20-.04	Logs and Reports	Yes	Contains general requirements
1200-3-20-.05	Copies of Logs Required	Yes	Contains general requirements
1200-3-20-.06	Report Required Upon the Issuance of a Notice of Violation	Yes	Contains general requirements
1200-3-20-.07	Special Reports Required	Yes	Contains general requirements
1200-3-20-.08	Rights Reserved	Yes	Contains general requirements
1200-3-20-.09	Additional Sources Covered	Yes	Contains general requirements
CHAPTER 1200-3-21(3-28)(16-90)(96.02)	GENERAL ALTERNATE EMISSION STANDARDS	NA	
CHAPTER 1200-3-22(3-29)(16-91)(96.02)	LEAD EMISSION STANDARDS	NA	
CHAPTER 1200-3-24(3-40)(16-52)(96.02)	GOOD ENGINEERING PRACTICE STACK HEIGHT REGULATIONS		
1200-3-24-.01	General Provisions	Yes	Contains general requirements
1200-3-24-.02	Definitions	Yes	Contains general requirements
1200-3-24-.03	Good Engineering Practice Stack Height Standards	Yes	Contains general requirements
1200-3-24-.04	Specific Emission Standards	Yes	Contains general requirements
CHAPTER 1200-3-25(3-39)(16-91.1)(96.02)	STANDARDS FOR INFECTIOUS WASTE INCINERATORS	NA	
CHAPTER 1200-3-30(3-36)(16-91.2)(96.02)	ACIDIC PRECIPITATION CONTROL	NA	
CHAPTER 1200-3-31(3-37)(16-91.3)(96.02)	CASE BY CASE DETERMINATIONS OF HAZARDOUS AIR POLLUTANT CONTROL REQUIREMENTS	NA	
CHAPTER 1200-3-32(3-38)(16-91.4)(96.02)	PREVENTION OF ACCIDENTAL RELEASES		
1200-3-32-.01	Purpose and Intent	Yes	Contains general requirements
1200-3-32-.02	Definitions	Yes	Contains general requirements

OTHER (LOCAL ONLY)			
(3-2)(16-56)(96.05)	Enforcement - Violations of Chapter - Notice; Citation; Injunctive Relief	Yes	Contains general requirements
(3-3)(16-57)(96.99)	Penalties - Misdemeanor, Civil, and Noncompliance	Yes	Contains general requirements
(3-4)(16-59)(96.07)	Enforcement - Emergency Powers of Health Officer	Yes	Contains general requirements
(3-10)(16-58)(96.06)	Enforcement - Variances	Yes	Contains general requirements
(3-11)(16-51)(96.04)	Severability	Yes	Contains general requirements
(3-12)(16-48)(96.01)	Words, Phrases Substituted in State Regulations Adopted by Reference	Yes	Contains general requirements
(3-13)(16-61)(96.25)	Right Of Entry	Yes	Contains general requirements
(3-16)(16-50)(96.03)	Open Burning	Yes	Contains general requirements
(3-18)(16-89)(96.10)	Fugitive Dust	Yes	Contains general requirements
(3-19)(16-88)(96.09)	Nuisance Abatement	Yes	Contains general requirements
(3-35)(16-71)(96.08)	Created; Membership; Term of Office; Jurisdiction; Hearings; Appeals	Yes	Contains general requirements
(14.5-27-28, 30-32, 34-36)(16-93 through 100)(96.26-96.33)	Permits and Fees (Various)	Yes	Contains general requirements
(14.5-35)(16-101)(96.99)	Penalty Provisions	Yes	Contains general requirements
(14.5-36)(16-102)(96.33)	Annual Review of Fee Structure and Financial Need	Yes	Contains general requirements

Carrier Corporation

(Title V Operating Permit No. 00083-01TV(R))

Federal Applicable Requirements Overview

(March 19, 2020)

CFR Part	Description	Applicable Req.	Notes
40 CFR 50.1 — 50.18	National Primary and Secondary Ambient Air Quality Standards	Yes	Contains general requirements
40 CFR 52.21	Prevention of Significant Deterioration of Air Quality	Yes	Contains general requirements for PSD sources. This Carrier facility is a major source of VOCs.
40 CFR 54	Prior Notice of Citizen Suits	Yes	Contains general requirements
40 CFR 60 (Subpart A)	Standards of Performance for New Stationary Sources: General Provisions	Yes	Contains general requirements applicable to Boiler B-4 (EU-12)
40 CFR 60 (Subpart Dc)	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Yes	Contains specific requirements applicable to Boiler B-4 (EU-12)
40 CFR 60 (Subpart IIII)	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	Yes	Contains specific requirements applicable to the 132 HP emergency fire pump engine that replaced an older 170 HP emergency fire pump engine at this facility in 2015 .
40 CFR 63 (Subpart A)	NESHAP: General Provisions	Yes	Contains general requirements
40 CFR 63 (Subpart NNNN)	National Emission Standards for Hazardous Air Pollutant Emissions: Surface Coating of Large Appliances	NA	The potential to emit HAPs from this facility (Reference Title V permit renewal application, dated April 13, 2009 (potential to emit calculations) is below the major source threshold (Reference § 63.2); therefore, this rule is not applicable.
40 CFR 63 (Subpart ZZZZ)	National Emission Standards for Hazardous Air Pollutant Emissions for Reciprocating Internal Combustion Engines	Yes	Contains specific requirements applicable to 462 HP emergency generator and a 132 HP emergency fire pump engine at this facility.
40 CFR 63 (Subpart DDDDD)	National Emission Standards for Industrial/Commercial/Institutional Boilers and Process Heaters	NA	The potential to emit HAPs from this facility (Reference Title V permit renewal application, dated April 13, 2009 (potential to emit calculations) is below the major source threshold (Reference § 63.2) since this rule was published in the Federal Register on March 21, 2011; therefore, this rule is not applicable.
40 CFR 63 (Subpart JJJJJJ)	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources	NA	The boiler at this Carrier facility is not subject to this area source NESHAP pursuant to §63.11195(e), which exempts gas-fired boilers as defined in subpart under §63.11237
40 CFR 66	Assessment and Collection of Noncompliance Penalties by EPA	Yes	Contains general requirements
40 CFR 70	State Operating Permit Programs	Yes	Contains general requirements for Title V major source operating permits. This Carrier facility is a Title V major source.
40 CFR 82 (Subpart A)	Protection of Stratospheric Ozone — Production and Consumption Controls	Yes	This Carrier facility has air conditioners and/or re Fridgeration units that use ozone depleting substances (ODS). Facility personnel do not maintain, service, repair, and/or dispose of motor vehicle air conditioners. Generic permit language requirements are included in the Title V operating permit for this facility. These regulations are not applicable to the construction of the Fluidized Bed Parts Cleaner (EU-21) and are not included within the construction permit.
40 CFR 82 (Subpart C)	Ban on Nonessential Products Containing Class I Substances and Ban on Nonessential Products Containing or Manufactured with Class II Substances	Yes	
40 CFR 82 (Subpart E)	The Labeling of Products Using Ozone Depleting Substances	Yes	
40 CFR 82 (Subpart F)	Recycling and Emissions Reduction	Yes	

APPENDIX B

Emission Summary Table

EMISSION SUMMARY

DATE	SOURCE #	FACILITY NAME	FACILITY CLASSIFICATION			LAST INSPECTION	PERMIT ENG:	FORTUNATO
December 28, 2020	00083	Carrier Corporation	MAJOR	MINOR	SYNTHETIC MINOR	January 23, 2020	RECORD:	5274
			X					

ALLOWABLE PERMITTED POLLUTANT (tons per 12-month rolling period)

PERMIT #	ISSUED	MODIFIED	EXPIRED	PM	SO ₂	VOC	CO	NO _x	PB	PERC	HAP	PM ₁₀	CO _{2e} (PTE)	Check if Applicable			
														MA CT	NESHAP	NSPS	PDD/OT NSR
00083-01TV	PENDING	NA	PENDING	6.1	0.2	231.8	14.8	27.9	Not Applicable	Not Applicable	4.4	6.1	19,337		X	X	
											Individual HAP 12.6						
											Combined HAP's						
TOTAL¹ (Tons):				6.1	0.2	231.8	14.8	27.9	Not Applicable	Not Applicable	12.6	6.1	19,337				
Classification for each pollutant should be added here based on number of tons: A = Major SM = Synthetic Minor B = Minor				B	B	A	B	B				B					
CHECK IF NONATTAINMENT STATUS APPLIES:						X							Subparts:		III	Dc, ZZZZ	
RACT/BACT/LAER REQUIRED?													Pollutant:		HAP	SO ₂ , PM ₁₀	

¹ Excludes emergency generators