COUNTY OF ALLEGHENY

RICH FITZGERALD
COUNTY EXECUTIVE

Air Quality Program

301 39th Street, Clack Health Center Building 7, Pittsburgh, PA 15201-1811
ph: 412.578.8103 • 24-hr: 412.687.ACHD (2243) • ***www.alleghenycounty.us/healthdepartment***

SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN

04 **AFFIDAVIT**

I certify that, subject to the penalties of Title 18Pa. C.S.A. Section 4904 and 35 P.S. Section 4009(b)(2), I am the responsible official having primary responsibility for the operation of the facilities to which this air pollution mitigation plan applies and that the information provided in this mitigation plan is true, accurate and complete to the best of my knowledge, information and belief formed after reasonable inquiry.

Signature: [signature] **Date** 12/27/2021

Typed/Printed Name: Marshall Holmes

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APPLICANT INFORMATION

The Air Pollution Mitigation Plan is submitted by affected facilities to meet the requirements of Allegheny County regulations found in §2106.06 (Mon Valley Air Pollution Episode) of Article XXI.

01 Facility Information

Name of Facility	Eastman Chemical Resins, Inc. Jefferson Site
Address	2200 State Route 837
City State Zip+4	Jefferson Hills, PA 15025
Permit #	IP-0058-I008c through I027a
Phone	412-358-2505

02 Environmental Contact Information (Person to contact regarding technical details of this mitigation plan)

Name/Title	Joshua Broad
Address	P O Box 545
City State Zip+4	West Elizabeth, PA 15088-0545
Email	Joshua.Broad@eastman.com
Phone	412-813-2205

03 Responsible Official Information

Name/Title	Marshall Holmes
Address	P O Box 545
City State Zip+4	West Elizabeth, PA 15088-0545
Email	mholmes@eastman.com
Phone	412-264-2520 x 2268

DEBRA L. BOGEN, MD, DIRECTOR
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Signature:	**Date**
Typed/Printed Name: Marshall Holmes	

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SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN

05 List all equipment or processes at your facility that emit PM_{10} and/or $PM_{2.5}$

See Attachment 1 for the listing of individual equipment and processes that generate PM10 and PM2.5. These can be classified in one of four general categories; cooling water towers, roads, combustion devices, and solids handling equipment. Emissions from cooling towers and roads comprise over 80% of the historical emissions. The remaining 28 combustion and process sources emit the remaining less than 20% of emissions. None of the 28 sources has average emissions more than 1 tpy over the 2017-2020 period.

WATCH PHASE OF MITIGATION PLAN

06 How will your facility ensure that equipment which produces particulate emissions is operating in a manner consistent with optimal engineering practices?

Operation of cooling towers, combustion devices and solids handling equipment (which includes the emission controls such as baghouses, other filters and scrubbers) is executed by established written operating procedures and work instructions. Operators receive both training on all of the procedures for the equipment they are expected to operate. Per the relevant Installation Permits, operating parameters are established for the periodic monitoring of process parameters for particulate matter air pollution control devices (ex. scrubbing water flow for scrubbers, differential pressure for baghouses).

Water quality affects particulate emission formation from cooling towers; having adequate blowdown (e.g. wasting used

07 How will your facility ensure that air pollution control equipment is maintained in optimal working condition?

Eastman maintains equipment by way of regularly scheduled preventive maintenance which is consistent with manufacturers' recommended maintenance practices and with practices generally identified within Eastman as good and appropriate to ensure highest reliability. Both preventive and reactive maintenance is scheduled and tracked by way of a database management software and records are kept of all preventive maintenance and repairs. Specific to boilers and heaters, the site executes periodic tune-ups and burner inspections to ensure proper operation.

For the watch phase, see the responses in question 06

08 How will your facility ensure that actions taken in blocks 05 and 06 are properly monitored, recorded, and reported to the Health Department?

Eastman proposes to keep logs of visual inspections executed during watches. Eastman proposes to keep logs or records of cooling tower water quality checks. Operation of air pollution controls will be recorded per the relevant installation permits; these will be reported per the requirements of the relevant permits on a semi-annual basis. Records of maintenance and tune-up records will be maintained per the site's established maintenance procedures.

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SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN

WARNING PHASE OF MITIGATION PLAN

09 How will your facility ensure that procedures are in place so enough staff and resources are available to implement the Mon Valley Air Pollution Warning Phase within 24 hours of the notification from ACHD?

The manufacturing facility is staffed for 24/7 operation. Day shift operation M-F includes unit managers and support staff in addition to the first line supervision and operators who run the operation. Eastman will designate individual(s) to accomplish the communication, evaluation and inspection roles described in this plan.

10 For every process and piece of equipment, list all available methods to reduce $PM_{2.5}/PM_{10}$ emissions from your four-year hourly average. During an actual warning phase, the actions to reduce emissions must last the length of the episode.

See attachment 2

11 For each piece of equipment and process, determine which emission reduction methods are feasible. List whether each method is feasible or infeasible and provide a justification for your determination.

See Attachment 3

SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN

12 How will your facility ensure that actions taken in block 10 are properly monitored, recorded, and reported to the Health Department?

Eastman proposes to keep logs of visual inspections executed during watches. Eastman proposes to keep logs or records of cooling tower water quality checks. Operation of air pollution controls will be recorded per the relevant installation permits; these will be reported per the requirements of the relevant permits on a semi-annual basis. Records of maintenance and tune-up records will be maintained per the site's established maintenance procedures.

13 Provide an active spreadsheet containing the following:

- Calculations of your facility's $PM_{2.5}$ and PM_{10} emissions for each of the past four years (2017-2020) in tons/year for every piece of equipment and process;
- Calculation of average four year emissions of $PM_{2.5}$ and PM_{10} in lbs/hr for each piece of equipment and process;
- Feasible $PM_{2.5}$ and PM_{10} emission reductions in lbs/hr that will occur during a warning phase for every piece of equipment and process as well as the facility total; and
- Feasible $PM_{2.5}$ and PM_{10} emission reductions in percent reduced from the hourly four year average for every piece of equipment and process as well as the facility total percent reduction.

This spreadsheet will be used to calculate actual emission reductions that will be reported to the Health Department after warning phases have ended.

14 How much time will be required for your facility to implement the emission reductions in block 10?

Eastman estimates that it will require between 12 to 24 hours to implement the actions proposed; however, since this has never been attempted, the actual time required is unknown to Eastman and will not be practically understood until the plan is tested.

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SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN

INSTRUCTIONS Submission Form for the Air Pollution Mitigation Plan	
Block 01 Facility Information	The facility name for the operation at that particular address should be used and not the name of the larger corporation. Use the address for the actual facility and not the company headquarters, if different. The most recent permit number should be included. If it is not known, it can be left blank.
Block 02 Environmental Contact Information	Fill in the contact information of the individual (e.g. employee or consultant) who will be contacted to provide environmental technical information for the Air Pollution Mitigation Plan
Block 03 Responsible Official Information	This address and phone number are for the office where the responsible official works the majority of the time. See block 04 instructions for information regarding the responsible official.
Block 04 Affidavit	This affidavit must be signed by the responsible official. A Responsible Official is a President, Vice President, Secretary, Treasurer, General Partner, General Manager, a member of a Board of Directors, or Owner, depending on business structure. CORPORATION – President, Vice President, Secretary, Treasurer, or duly authorized person BUSINESS – Sole Proprietor or General Partner GOVERNMENT ENTITY – Ranking elected official or principal executive officer

Blocks 05–08
Watch Phase of Mitigation Plan
	The responses that you provide in blocks 05 through 08 will be specific to your equipment and facility. Below are some general ideas that may help you in how to approach these requirements.
	• Staff related
	  ◦ Review procedures with employees to ensure all equipment is properly operating in a way to minimize air emissions.
	  ◦ Schedule additional or on-call employees for upcoming shifts to ensure facility is fully staffed for a warning phase.
	  ◦ Conduct a shift meeting(s) to remind employees to prioritize the environmental impact of their operations to reduce emissions.
	  ◦ Share any other procedures which would help ensure sufficient staff levels and available resources to implement a warning phase.
	• Equipment related
	  ◦ Inspect any equipment or processes which may have a potential to increase emissions to ensure proper operation and maintenance.

SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN

	• Implement improved operation and maintenance practices beyond standard operating procedures. • Ensure the facility is following the idling requirements under Act 124 of the PA Department of Environmental Protection regulations. • Conduct maintenance on all pollution control equipment. • Share any other procedures which help ensure the facility is operating in a manner consistent with good engineering practices. • Share any other procedures which help ensure the air pollution control equipment is maintained in good working condition.
Block 09 Warning Phase of Mitigation Plan	A good starting point in completing this block is to refer to the table found in section II of your facility's air quality permit titled "Emission Unit Identification" and identify which units emit particulate matter. There may be other equipment, not listed in the section II table, that can be included in the block 09 list.
Block 10 Warning Phase of Mitigation Plan	Block 10 should explain what actions the facility could possible take to ensure that hourly emissions are reduced. Possible methods include: • Reduction in material throughput • Reduction in operating time • Increased use of controls or suppression equipment • Changes in raw materials Examples of possible actions include: • Reduce production by a certain percentage or rate from normal operating conditions. A reduction from a potential maximum production rate will not be accepted if it is too high compared to normal operating rates for the relevant time period, thereby not resulting in an actual reduction in pollution. • Reduce usage of diesel fuel or other $PM_{2.5}$ or PM_{10} creating fuel types or switch fuel types to lower $PM_{2.5}$ or PM_{10} as allowed by the relevant permits. • Bring in additional employees to allow the facility to operate in the best environmentally responsible manner. • Delay production to a future day when a mitigation plan is not needed. • Delay any non-essential activities to a future day when a mitigation plan is not needed. • Fully or partially enclose material movement and other work activities which produce dust and other particulate matter ($PM_{2.5}$ or PM_{10} emissions). • Modify work practices to decrease $PM_{2.5}$ or PM_{10} emissions such as:

SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN

	○ Slowing material handling ○ Fully or partially enclose material movement and other work activities which produce dust and other particulate matter ($PM_{2.5}$ or PM_{10} emissions). • Stop or decrease unnecessary transportation activities and reduce travel speed on necessary transportation. • Employ additional roadway wetting or other activities to minimize road dust creation. • Add any other measures which reduce $PM_{2.5}$ or PM_{10} emissions.
Block 11 Warning Phase of Mitigation Plan	Emission reduction methods that are feasible can be eliminated from consideration for other reasons as long as adequate justification is given.
Block 12 Warning Phase of Mitigation Plan	The Health Department will require a report, submitted after the warning phase has ended, itemizing what actions were taken to meet the requirements of the warning phase.
Block 13 Warning Phase of Mitigation Plan	The spreadsheet must include actual plant emissions of $PM_{2.5\ and}$ PM_{10} for all equipment listed in block 09 for each of the past four years (2017-2020) in tons/year. These calculations can be copied directly from the spreadsheets submitted to the Health Department for emissions inventories. For each piece of equipment and process, emissions from the last four years must be provided in tons/year. For each piece of equipment and process, proposed feasible emission reductions must be provided in lbs/hr. The hourly average will be calculated for each unit and process by adding yearly emissions together and dividing by the total number of hours that the unit emitted over four years. In the case of a batch process, calculations will need to take into account the number of hours in each batch and the number of batches in a year.
Block 14 Warning Phase of Mitigation Plan	Section 2106.06 of county air quality regulations requires that an affected facility is able to implement the requirements of the warning phase within 24 hours.

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SUBMISSION FORM – AIR POLLUTION MITIGATION PLAN

Mitigation Plan Checklist

The following checklist is provided as a list of items required for a complete mitigation plan submission. If at any time you have questions about your application, please call JoAnn Truchan 412-578-7981 or Jayme Graham 412-578-8129.

- ☐ Has the responsible official signed and dated the first page (block 04)?
- ☐ Have you provided an active spreadsheet showing actual emissions for every piece of equipment and process of $PM_{2.5}$ and PM_{10} for the past four years in tons per year?
- ☐ Does the spreadsheet include the average actual $PM_{2.5}$ and PM_{10} emissions from every piece of equipment and process for the past four years in lbs/hr?
- ☐ Does the spreadsheet include the PM_{10} and $PM_{2.5}$ reduction that will be achieved from every piece of equipment and process in lbs/hr and % from the four year hourly average during the warning phase?
- ☐ Have you provided a complete response for each of the fourteen blocks?

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PM2.5 Episode Plan

Attachment 2:

10 For every process and piece of equipment, list all available methods to reduce PM2.5/PM10 emissions from your four-year hourly average. During an actual warning phase, the actions to reduce emissions must last the length of the episode.

(see Attachment 1 for specific list)

Cooling Towers

1) Shut off cooling water circulation and fans
2) Reduce cooling water circulation flow rate and fan speed
3) Increase blow down and introduce fresh water to reduce solids in the cooling water.

Roads

4) Water the roads
5) Reduce speed limits
6) Restrict or stop road use

Boilers and Heaters

7) Shut down boilers and heaters
8) Reduce boiler and heater operating rates
9) Fuel switch

Emergency Engine

10) Do not use the emergency engine in any circumstance
11) Do not run emergency engine for periodic maintenance and availability check

Solids Handling – Pastillating Belts and Bagging Operations

12) Do not pastillate and bag products
13) Restrict pastillation and bagging

Solids Handling – Raw Material Additions (Filter aids, addititives, etc)

14) Do not add raw materials
15) Restrict adding raw materials
16) Reclaiming / Recycling Resin

Miscellaneous Activities

17) Abrasive Blasting: Refrain from abrasive blasting.
18) Open Burning: Refrain from open burning

Attachment 3:

11 For every process and piece of equipment, determine which emission reduction methods are feasible. List whether each method is feasible or infeasible and provide a justification for your determination.

Cooling Towers

1) Shut off cooling water circulation and fans
2) Reduce cooling water circulation flow rate and fan speed
3) Increase blow down and introduce fresh water to reduce solids in the cooling water.

Of the available options for cooling towers, only option 3, increase blowdown and add fresh water is feasible. The cooling towers are essential to the operation of the facility's many coolers and condensers which function as air pollution control devices. The sole exception is the cooling tower for the pilot plant. Shutdown of the pilot plant is possible and is proposed as an action to be taken during the warning phase.

Roads

4) Water the roads
5) Reduce speed limits
6) Restrict or stop road use

The majority of the roads within the facility are paved and emissions from paved roads are a small amount of the estimated emissions from roadways as the emissions from unpaved roads dominate the estimate. The majority of the unpaved roadways are located in the large tank farm area.

Watering the roads is an effective means to reduce dust. However, the site does not own equipment to execute this task. With a 24-hour notification as the basis, Eastman does not believe it feasible to reliably obtain services to water the plant's roadways within the time required.

A similar reduction can be achieved by temporarily reducing activity on the tankfarm road by reducing its speed limit and by restricting use to only essential activities whenever the roads have not recently been wetted by rainfall or by intentional washing or wetting. The sitewide speed limit is 10 mph. During warning phases, it is proposed to reduce the targeted speed to between 5 to 8 mph or below except where emergency or safety critical activities warrant a higher rate. Practical limitations on the controllability of modern motor vehicles at speeds below 10 mph make setting a hard speed limit impractical. Activities in the upper tank farm where the majority of unpaved roads exist will be reduced as practical to only those activities as are necessary for safety and good operation (ex. Inspections and/or operation necessary tasks).

Boilers and Heaters

7) Shut down boilers and heaters
8) Reduce boiler and heater operating rates
9) Fuel switch

The facility uses a variety of boilers and process heaters to provide heat to the production processes. Each of these units is currently fired with the cleanest fuel possible (e.g. natural gas). With the recent

commitment to not burn liquid fuels in the Trane boiler, all of the units are fired with natural gas which by its nature, produces the minimum uncontrolled particulate emission rate of all available fuels. There are no active particulate emission controls on these units and to Eastman's knowledge, there is no RACT, BACT or LAER examples of particulate emission controls for natural gas combustion units of sizes that the site operates. This which limits options to either shutting the units down or restricting their use. None of the individual units have produced a significant emission rate over the past four years. Shutting down or restricting use would directly affect production rates and cannot be done during winter operations due to the damage that would occur due to freezing conditions. The cost of facility shutdown is in excess of $2 million per day in lost revenue and sales. Therefore, shutdown and/or reducing rates is not justifiable due to cost with little to no benefit.

Emergency Engine

10) Do not use the emergency engine in any circumstance
11) Do not run emergency engine for periodic maintenance and availability check

The purpose of the emergency engine is to provide power in the event of utility power loss. In this mode of operation, it is a necessary safety device and it is not feasible to shut it off. Periodic maintenance and availability checks can be deferred for a short period and this is proposed as part of the plan.

Solids Handling – Pastillating Belts and Bagging Operations

12) Do not pastillate and bag products
13) Restrict pastillation and bagging

The Pure Monomer Resins departments (MP Poly, WW Poly, Hydro, and LTCs) and C-5 departments make products which must be pastillated and bagged . Reduction in rates while feasible is not justifiable due to the low emission rate from these units and high cost of lost production. (See above discussion on boilers; delay or shutdown of the facility has the potential to affect in excess of $2 million per day in sales revenue from direct sales loss and an undefined higher amount for loss of customers who would move their purchases to facilities that would become more reliable suppliers.

Eastman notes that current representations of emissions from these sources assumes that the PM2.5 emitted is the same as that from PM10; this conservative assumption was made due to the lack of empirical data but it reasonable to believe that the product has only a fraction of the finer particles.

Solids Handling – Raw Material Additions (Filter aids, additives, etc.)

14) Do not add raw materials
15) Restrict adding raw materials
16) Reclaiming resin

These sources make up a small fraction of the facility's particulate emissions. As discussed above, restricting the use of raw materials is not justifiable due to lost production and the very low potential benefit. Eastman notes that current representations of emissions from these sources assumes that the PM2.5 emitted is the same as that from PM10; this conservative assumption was made due to the lack of empirical data but it reasonable to believe that the materials being added have only a fraction of the finer particles.

Miscellaneous Activities

1) Abrasive Blasting: Refrain from abrasive blasting.
2) Open Burning: Refrain from open burning

Eastman will conform to ACHD regulations that restrict abrasive blasting and open burning during emission episodes.

Mon Valley Air Pollution Mitigation Plan - Eastman Chemical Resins, Inc.
Attachment 1 - List of Sources and Predicted Reductions

Date Prepared: 2/14/2022

Watch Phase																	
Block 5: List of Equipment that emits PM_{10} or $PM_{2.5}$			Block 13: Provide active spreadsheet with the following														
Plant	Equipment Type	Equipment Description	a. Calculations of PM10 for each of past 4 years 2017 - 2020 in TPY for each piece of equipment (PM10/ PM2.5) [From AES]				a. Calculations of PM2.5 for each of past 4 years 2017 - 2020 in TPY for each piece of equipment (PM10/ PM2.5) [From AES]				b. Calculations of average 4 year emissions PM_{10} in lb/hr for each piece of equipment	b. Calculations of average 4 year emissions $PM_{2.5}$ and PM_{10} in lb/hr for each piece of equipment	Percent Contribution of Facility Total Emissions	c. Feasible emission reduction of PM_{10} in lb/hr for each piece of equipment as well as site total.	c. Feasible emission reduction of $PM_{2.5}$ in lb/hr for each piece of equipment as well as site total.	d. Feasible emission reduction of PM_{10} percent from 4 year average for each piece of equipment as well as site total.	d. Feasible emission reduction of $PM_{2.5}$ percent from 4 year average for each piece of equipment as well as site total.	Basis of Reduction Estimate
			2017	2018	2019	2020	2017	2018	2019	2020	lb/hr	lb/hr						
LTC	Cooling Tower	#1 LTC (Flaker) J-101-1																25% reduction in solids in cooling water averaged across all towers is believed possible. Practicality of actual benefits are to be determined and may be less or greater depending upon incoming water quality and the water quality of the recirculating water at the time of the warning.
LTC	Cooling Tower	#2 LTC (WW LTC) J-645																
LTC	Cooling Tower	#4 LTC J-40301-1																
C5	Cooling Tower	C5 J-1000-1 (Replaced "C5 Old")																
C5	Cooling Tower	C5 J-1200-1																
C5	Cooling Tower	C5 New J-1000-5																
C5	Cooling Tower	C5 Pastillator Tower																
Boiler House	Cooling Tower	Emulsion/BH J-4010-1																
Hydro	Cooling Tower	Hydro J-4005-1																
MP Poly	Cooling Tower	MP Poly J-1000-1																
Pilot Plant	Cooling Tower	Pilot Plant																
WW Poly	Cooling Tower	WW Poly J-4060-1																
Site	**Cooling Tower**	**All Towers (from AES)**	**5.676**	**5.676**	**5.676**	**6.033**	**5.676**	**5.676**	**5.676**	**6.033**	**1.316**	**1.316**	**58%**	**0.33**	**0.33**	**25%**	**25%**	
Site	Paved Roads	Site	0.028	0.031	0.034	0.044	0.007	0.008	0.008	0.011	0.089	0.008	4%	0.0891	0.0077	20%	20%	20% reduction in vehicle speeds
Site	Unpaved Roads	Site	1.515	1.691	1.823	2.364	0.152	0.169	0.182	0.236	0.422	0.042	19%	0.4219	0.0422	20%	20%	20% reduction in vehicle speeds
Boilers	Boiler	Unilux Boiler #1	0.179	0.151	0.227	0.184	0.179	0.015	0.227	0.184	0.042	0.042	2%	No feasible reductions are possible.	No feasible reductions are possible.			Options are not feasible due to excessive cost and minimal potential benefit. This category's sources are small emission sources already well controlled.
Boilers	Boiler	Unilux Boiler #2																
Boilers	Boiler	Unilux Boiler #3	0.104	0.160	0.143	0.147	0.104	0.160	0.143	0.147	0.032	0.032	1%					
Boilers	Boiler	Unilux Boiler #4																
Boilers	Boiler	Trane Boiler - Nat gas	0.041	0.089	0.106	0.072	0.041	0.089	0.106	0.072	0.018	0.018	1%					
		Trane Boiler - Oil	0.000	0.000	0.000	NA	0.000	0.000	0.000	NA	NA	NA	NA					
LTC	Heater	LTC #2 Hot Oil Heater	0.037	0.017	0.021	0.035	0.037	0.017	0.021	0.035	0.006	0.006	0%					
LTC	Heater	LTC #4 Hot Oil Heater	0.025	0.025	0.033	0.025	0.025	0.025	0.033	0.025	0.006	0.006	0%					
C5	Heater	C5 Hot Oil Heater	0.056	0.057	0.051	0.044	0.056	0.057	0.051	0.044	0.012	0.012	1%					
C5	Oxidizer	C5 Thermal Oxidizer	0.021	0.008	0.026	0.019	0.021	0.008	0.026	0.019	0.003	0.003	0%					
Boilers	Diesel Engine	Emergency Generator (Permit emissions)	0.010	0.010	0.010	0.010	0.010	0.010	0.010	0.010	0.020	0.020	1%	0.02	0.02	100%	100%	Non-operation during Warning except as needed for emergency conditions.
Site	Water heaters, comfort heaters, etc.	Miscellaneous Natural Gas Usage	0.020	0.009	0.006	0.012	0.020	0.009	0.006	0.012	0.003	0.003	0%	No feasible reductions are possible.	No feasible reductions are possible.			Options are not feasible due to excessive cost and minimal potential benefit. This category's sources are small emission sources already well controlled.
LTC	Baghouse/ Scrubber	# 1 Pastillator Belt Baghouse	0.007	0.006	0.007	0.070	0.007	0.006	0.007	0.070	0.004	0.004	0%	No feasible reductions are possible	No feasible reductions are possible			Options are not feasible due to excessive cost and minimal potential benefit. This category's sources are small emission sources already well controlled
LTC	Baghouse/ Scrubber	#2 Pastillator Belt Baghouse	0.059	0.055	0.059	0.060	0.059	0.055	0.059	0.060	0.135	0.135	6%					
LTC	Baghouse/ Scrubber	Berndorf Pastillator Belt Baghouse	0.026	0.024	0.024	0.252	0.026	0.024	0.024	0.252	0.019	0.019	1%					
C5	Baghouses	$ALCl_3$ Silo	0.001	0.001	0.000	0.000	0.001	0.001	0.000	0.000	0.000	0.000	0%					
C5	Baghouses	$ALCl_3$ Receiver	0.007	0.006	0.003	0.003	0.007	0.006	0.003	0.003	0.004	0.004	0%					
C5	Baghouses	$ALCl_3$ Charging Chamber	0.357	0.331	0.157	0.159	0.357	0.331	0.157	0.159	0.057	0.057	3%					
C5	Baghouse	Reclaim Dump Station	0.021	0.035	0.003	0.003	0.021	0.035	0.003	0.003	0.004	0.004	0%					
C5	Baghouse	Inhibitor Dump Station	0.005	0.005	0.001	0.001	0.005	0.005	0.001	0.001	0.001	0.001	0%					
Dresinate	Baghouse	Dresinate Production Line	0.065	0.117	0.085	0.087	0.065	0.117	0.085	0.087	0.014	0.014	1%					
C5	Filter/Demister/ Baghouse	C5 Pastillator Belt and Solids Handling	1.653	2.011	0.036	0.033	1.653	2.011	0.036	0.033	0.008	0.008	0%					
WW Poly	Baghouse	Reclaim Pot Dust Collector		0.003	0.002	0.005		0.003	0.002	0.005	0.001	0.001	0%					
WW Poly	Cartridge Filter	Slurry Bag Dump Station Filter	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0%					
WW Poly	Cartridge Filter	Lime-FilterAid Bag Dump Station	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0%					
C5	Cartridge Filter	Sparkler Filter	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0.001	0%					
MP Poly	Baghouse	MP Poly Lime Receiver	0.197	0.070	0.072	0.052	0.197	0.070	0.072	0.052	0.022	0.022	1%					
MP Poly	Baghouse	MP Poly Precoat Tank	0.027	0.014	0.017	0.011	0.027	0.014	0.017	0.011	0.004	0.004	0%					
MP Poly	Baghouse	MP Poly Lime Silo	0.000	0.001	0.001	0.000	0.000	0.001	0.001	0.000	0.000	0.000	0%					
C5		C5 Reclaim Dump Station	0.021	0.035	0.003	0.003	0.021	0.035	0.003	0.003	0.004	0.004	0%					
C5		Sparkler Precoat Tank	0.000	0.000	0.020	0.000	0.000	0.000	0.020	0.000	0.005	0.005	0%					
SITE TOTALS			**10.16**	**10.64**	**8.64**	**9.73**	**8.77**	**8.96**	**6.98**	**7.57**	**2.25**	**1.79**		**0.86**	**0.40**	**38%**	**22%**	