Technical Support Document
for
Draft Air Emission Permit No. 05301286-104

This technical support document (TSD) is intended for all parties interested in the draft permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp. 1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the preliminary determination to issue the draft permit.

1. General information

1.1 Applicant and stationary source location

Table 1. Applicant and source address

Applicant/Address	**Stationary source/Address** (SIC Code: 2834 - Pharmaceutical Preparations)
Bora Pharmaceuticals Inc. 6701 Evenstad Dr N Maple Grove, Minnesota 55369-6026	Bora Pharmaceuticals Inc. 6701 Evenstad Dr N Maple Grove, MN 55369-6026
Contact: Megan Gustafson Phone: 763-315-2474	

1.2 Facility description

Bora Pharmaceuticals (Permittee) manufactures pharmaceuticals at their Maple Grove facility. The main sources of emissions are fluid bed processors, tablet coaters, milling operations, solution preparation tanks, and boilers. The primary pollutants of concern include particulate matter (PM), particulate matter less than 10 microns (PM_{10}), particulate matter less than 2.5 microns ($PM_{2.5}$), volatile organic compounds (VOC), and methanol as a hazardous air pollutant (HAP). The boilers emit products of combustion such as carbon monoxide (CO) and nitrogen oxides (NO_x). The Permittee uses a regenerative thermal oxidizer to reduce HAP and VOC emissions and fabric filters to control PM, PM_{10}, and $PM_{2.5}$ emissions.

1.3 Description of the activities allowed by this permit action

This permit action is a Part 70 Reissuance. This permit action includes an administrative amendment for a change in operator.

1.4 Description of notifications and applications included in this action

Table 2. Notifications and applications included in this action

Date received	**Application/Notification type and description**
12/02/2025	Administrative Amendment (IND20250002)
02/03/2025, with supplemental application materials received on May 14, 2026	Part 70 Reissuance (IND20250001)

1.5 Facility emissions

Table 3. Total facility potential to emit summary

	PM tpy	**PM_{10}**** tpy	**$PM_{2.5}$**** tpy	**SO_2** tpy	**NO_x** tpy	**CO** tpy	**CO_2e** tpy	**VOC** tpy	**Single HAP** tpy	**All HAPs** tpy
Total facility limited potential emissions	44.9	47.5	47.5	0.28	47.1	39.6	56,828	91.9	91.9	92.8
Total facility actual emissions (2024)	11.6	11.6	11.6	0.002	0.32	0.27	*	16.3	*	

*Not reported in Minnesota emission inventory.

**PM_{10} and $PM_{2.5}$ have a lower control efficiency than PM, therefore potential emissions appear higher.

Table 4. Facility classification

Classification	Major	Synthetic minor/area	Minor/Area
New Source Review		X	
Part 70	X		
Part 63	X		

1.6 Changes to permit

The permit does not authorize any specific modifications, however, the MPCA has a combined operating and construction permitting program under Minnesota Rules Chapter 7007, and under Minn. R. 7007.0800, the MPCA has authority to include additional requirements in an operating permit. The following changes to the permit are made through this permit action:

- The permit has been updated to reflect current MPCA templates and standard citation formatting;
- Completed requirements and the requirements for equipment that has been removed have been deleted;
- Subject item details are updated based on the equipment that was actually installed;
- Some requirements have been reordered or moved to help with clarity (i.e., similar requirements are grouped);
- Due to the recent change in ownership, the construction authorization has been extended through the term of this permit;
- Insignificant activities at the facility were updated to reflect the current activities on site as well as changes to these rules since the last permit was issued;
- Appendix B was updated to include additional process rate information used for calculating short term potential to emit calculations; and
- Appendix G was added to document information about emission units for which construction is authorized.

2. Regulatory and/or statutory basis

2.1 New source review (NSR)

The permit carries forward limits on the facility such that it is a minor source under New Source Review regulations. No modifications are authorized by this permit.

2.2 Part 70 permit program

The facility is a major source under the Part 70 permit program.

2.3 New source performance standards (NSPS)

The Permittee has stated that New Source Performance Standards apply to the operations at this facility.

40 CFR pt. 60, subp. Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, applies to boilers EQUIs 8, 9, and 10. The remaining boilers, EQUIs 2-7, 11, and 12, are not subject to NSPS Dc because their heat input capacities are less than the 10 MMBtu/hr minimum threshold for applicability under the standard

2.4 National emission standards for hazardous air pollutants (NESHAP)

The facility is a major source of hazardous air pollutants.

40 CFR pt. 63, subp. GGG: National Emission Standards for Pharmaceuticals Production applies to certain fluid bed processors (EQUIs 15, 16, 17, 19), solution preparation tanks and one of the tablet coaters (EQUI 22). These units all use methanol as a solvent and are subject to the process vent requirements in 40 CFR §

63.1254. Methanol emissions will be captured and vented through the TREA 1 regenerative thermal oxidizer (RTO) to achieve the 98% control efficiency required by the standard. Equipment leaks represented by FUGI 1 are subject to the equipment leak requirements in 40 CFR § 63.1255. The remaining emission units at the facility are not subject to 40 CFR pt. 63, subp. GGG as they do process solvents with HAP. The Plant B units that previously operated as a pilot plant and were exempt from 40 CFR pt. 63, subp. GGG as research and development activities are now production units. However, they are not subject to 40 CFR pt. 63, subp. GGG because they do not process, use, or produce HAP, per 40 CFR § 63.1250(a)(1)(iii).

Boilers EQUIs 3-12 are subject to 40 CFR pt. 63, subp. DDDDD: NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The six 0.199 mmBtu/hr hot water boilers that qualify as insignificant activities meet the definition of hot water boiler under the standard; therefore, under 40 CFR § 63.7491(d), they are not subject to 40 CFR pt. 63, subp. DDDDD.

2.5 Compliance assurance monitoring (CAM)

The fluid bed processors (EQUIs 15, 16, 17, and 19) and a tablet coater (EQUI 22) have pre-control VOC emissions greater than 100 tpy and use a control (TREA 1) to comply with the VOC limit at COMG 2. The other units in COMG 2 do not vent emissions to the control.

The table below lists the sources subject to CAM, the control equipment used, whether the source is a large or other pollutant specific emission unit (PSEU), and the pollutants triggering CAM.

Table 5. CAM summary

Unit	Control	CAM applicability	Pollutant	Emission Limitation Basis
COMG 2 VOC cap	TREA 1 – thermal oxidizer	Other	VOC	Limit to avoid PSD major source and PSD major modification

See Attachment 3 to this document for the CAM Plan submitted by the applicant.

2.6 Regulatory overview

Table 6. Regulatory overview of facility

Subject item*	Applicable regulations	Rationale
COMG 2 VOC cap	Title I Condition: Avoid major modification under 40 CFR § 52.21(b)(2), Title I Condition: Avoid major source under 40 CFR § 52.21(b)(1)(i), Minn. R. 7007.3000	PSD. Limits to avoid major source and modification classification under PSD for all VOC-emitting units at the facility except for equipment leaks and existing insignificant activity hot water boilers. It is a 12-month rolling limit due to substantial and unpredictable variations in operation. The limits are written to apply to all existing, new, or modified VOC-emitting units. These limits combined with the control requirements at TREA 1 limit the VOC emissions to less than the PSD major source threshold.
COMG 3 Milling Activities	Minn. R. 7011.0715	Standards of Performance for post-1969 Industrial Process Equipment. Equipment for which there is no other promulgated performance standard is subject to the opacity and PM limits in this rule. Construction of the unit was on or after July 9, 1969.

Subject item*	Applicable regulations	Rationale
COMG 4 NESHAP GGG	40 CFR pt. 63, subp. GGG	National Emission Standards for Pharmaceutical Production. Applicable criteria include: • the facility is a major source of HAP emissions; • the facility manufactures a pharmaceutical product defined by 40 CFR § 63.1251; • the facility processes and uses HAP; • the facility is a new affected source; and • operations involve process vents and equipment leaks.
COMG 6 Process tanks and high shear granulation	Minn. R. 7011.0715	Standards of Performance for post-1969 Industrial Process Equipment. Equipment for which there is no other promulgated performance standard is subject to the opacity and PM limits in this rule. Construction of the unit was on or after July 9, 1969.
EQUIs 3, 4, 7,11, and 12 Boilers	40 CFR pt. 63, subp. DDDDD	NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters. Applicability criteria include: • the facility is a major source of HAP emissions; • the units are new; • the units burn gas 1 fuel; • the units each have a heat input capacity less than or equal to 5 mmBtu/hr; and • the units do not have an oxygen trim system.
	Minn. R. 7011.0515	Standards of Performance for New Indirect Heating Equipment. Per MPCA guidance, this rule applies in addition to the NESHAP. • construction of each unit was on or after January 31, 1977; • the units burn gaseous fuels; • the facility is located in the cities in Table II of the rule; • the capacity of each unit is less than or equal to 250 mmBtu/hr; and • the facility has less than or equal to 250 mmBtu/hr of direct and indirect heating equipment.
EQUIs 5 and 6 Boilers	40 CFR pt. 63, subp. DDDDD	NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters. Applicability criteria include: • the facility is a major source of HAP emissions; • the units are existing; • the units burn gas 1 fuel; • the units have a heat input capacity less than or equal to 5 mmBtu/hr; and • the units do not have an oxygen trim system.
	Minn. R. 7011.0515	Standards of Performance for New Indirect Heating Equipment. Per MPCA guidance, this rule applies in addition to the NESHAP. • construction of each unit was on or after January 31, 1977; • the units burn gaseous fuels; • the facility is located in the cities in Table II of the rule; • the capacity of each unit is less than or equal to 250 mmBtu/hr; and • the facility has less than or equal to 250 mmBtu/hr of direct and indirect heating equipment.
EQUI 8, 9, and 10 Boiler	40 CFR pt. 60, subp. Dc	NSPS for Small Industrial-Commercial-Institutional Steam Generating Units. Applicability criteria include: • each unit commenced construction after June 9, 1989; • each unit has a capacity greater than or equal to 10 MMBtu/hr and less than or equal to 100 mmBtu/hr; and • each unit burns only natural gas.

Subject item*	Applicable regulations	Rationale
	40 CFR pt. 63, subp. DDDDD	NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters. Applicability criteria include: • the facility is a major source of HAP emissions; • the units are new; • the units are in the subcategory of units designed to burn gas 1 fuel; • the units do not use an oxygen trim system; andthe units have a heat input capacity greater than or equal to 10 mmBtu/hr.
EQUIs 15, 16, 17, 19 and 22 Fluid bed processors	Title I Condition: Avoid major source under 40 CFR § 52.21(b)(1)(i) and Minn. R. 7007.3000	PSD. Recordkeeping to verify that when unit is processing VOC-containing materials, emissions are vented to the thermal oxidizer.
	Minn. R. 7011.0715	Standards of Performance for post-1969 Industrial Process Equipment. Equipment for which there is no other promulgated performance standard is subject to the opacity and PM limits in this rule. Construction of the unit was on or after July 9, 1969.
EQUIs 18 Fluid bed processor	Title I Condition: Avoid major source under 40 CFR § 52.21(b)(1)(i) and Minn. R. 7007.3000	PSD. Requirement to only use aqueous materials and not VOC-containing materials.
EQUIs 23, 24, 25, and 26 Tablet coaters	Minn. R. 7011.0715	Standards of Performance for post-1969 Industrial Process Equipment. Equipment for which there is no other promulgated performance standard is subject to the opacity and PM limits in this rule. Construction of the unit was on or after July 9, 1969.
EQUIs 27, 28, 29, 30, 31, 32, 49, 50, 51 and 52 Mills	Title I Condition: Avoid major source under 40 CFR § 52.21(b)(1)(i) and Minn. R. 7007.3000	PSD. Hood alignment requirements based on the hood certification are set to ensure capture efficiencies of the controls are met.
EQUIs 33 and 34 Plant B units	Minn. R. 7011.0715	Standards of Performance for post-1969 Industrial Process Equipment. Equipment for which there is no other promulgated performance standard is subject to the opacity and PM limits in this rule. Construction of the unit was on or after July 9, 1969.
FUGI 1 Equipment leaks	Minn. R. 7011.0715	Standards of Performance for post-1969 Industrial Process Equipment. Equipment for which there is no other promulgated performance standard is subject to the opacity and PM limits in this rule. Construction of the unit was on or after July 9, 1969.
TREA 1 Thermal Oxidizer	Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i), Title I Condition: Avoid major modification under 40 CFR § 52.21(b)(2), and Minn. R. 7007.3000	PSD. Control efficiency and other operating parameter requirements to reduce VOC emissions to avoid major source classification under PSD. Limit reflects that the units are in total enclosures. Permit specifies that replacement thermal oxidizer must meet TREA 1 requirements.
	40 CFR pt. 63, subp. GGG	National Emission Standards for Pharmaceutical Production. Requirement to operate control equipment and achieve 98% HAP control efficiency.

Subject item*	Applicable regulations	Rationale
TREAs 2, 3, 4, 5, 6, 9, 10, 11, 12, 13, 18 and 19 Fabric filters with total enclosures	Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000	PSD. Control efficiency and other operating parameter requirements to limit PM/PM_{10}/$PM_{2.5}$ PTE to avoid major source and modification classification under PSD. Limits reflect that the units have total enclosures. Permit specifies that replacement fabric filters must meet the control requirements.
TREAs 14, 15, 16, and 17 Fabric filters with hoods	Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000	PSD. Control efficiency and other operating parameter requirements to limit PM/PM_{10}/$PM_{2.5}$ PTE to avoid major source and modification classification under PSD. Limits reflect that the units have hoods. Permit specifies that replacement fabric filters must meet the control requirements.

*Location of the requirement in the permit (e.g., EQUI 1, STRU 2, etc.).

3. Technical information

3.1 Calculations of potential to emit (PTE)

Attachment 1 to this TSD contains a summary of the PTE of the Facility as well as detailed spreadsheets and supporting information prepared by the MPCA and the Permittee.

The pharmaceutical production operations at the facility occur through batch processes that require setup and cleaning time during which no emissions would be expected. Therefore, the maximum capacity of units that rely on batch processing is based on the least amount of time required for each batch to complete setup, processing, and cleaning phases. These times are converted to an equivalent batch per hour value to represent the maximum number of batches that could be run annually. This method for batch process rates applies to the fluid bed processors, tablet coaters, solution prep tanks, milling activities, and insignificant activities for dispensing, counting, weighing, packaging, etc. Specific assumptions underlying the development of maximum capacity for the batch processes are listed in Appendix B of the permit.

VOC and HAP emissions for fluid bed processors EQUI 15, 16, 17, 19 and tablet coater EQUI 22 are based on the maximum VOC- and HAP-containing material throughput as determined by minimum batch times, 8760 hours per year, and TREA 1 control efficiencies. Fluid bed processor EQUI 18 and tablet coaters 22, 23, 24, 25, and 26 do not use VOC or HAP containing materials, therefore, no VOC or HAP emissions are anticipated from these units. For particulate emissions, there are no emission factors specific to the fluid bed processors and tablet coaters, therefore, controlled emissions are based on vendor grain loading information, and unrestricted emissions are back calculated based on the control efficiencies.

For milling and solution prep tanks, emissions are calculations based on the batch process rates and EPA Webfire emission factors.

Criteria pollutant and HAP emissions from the natural gas boilers, including those that qualify as insignificant activities, are calculated based on maximum capacity, 8760 hours per year, and AP-42 emission factors, while greenhouse gas emissions are calculated based on maximum capacity, 8760 hours per year, 40 CFR pt. 98 emission factors and global warming potentials.

Insignificant activities include dispensing, encapsulation, packaging, tablet counting, and weighing. Emissions from these units are based on batch process rates and AP-42 emission factors. AP-42 emission factors for grain handling are used because there are no published emission factors for these activities.

3.2 Performance testing history

Table 6. TREA 1 control efficiency test results since the initial part 70 permit was issued

Subject Item	Date of MPCA Compliance Letter	Stack Test Start Date	Parameter	Limit	Tested Result	Units	Status
TREA 1	1/18/2024	6/20/2023	HAPs	≥ 98	98.0	% control efficiency	Compliant
TREA 1	1/18/2024	6/20/2023	VOC	≥ 98	98.0	% control efficiency	Compliant

3.3 Monitoring

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements.

In evaluating the monitoring included in the permit, the MPCA considered the following:

- the likelihood of the facility violating the applicable requirements;
- whether add-on controls are necessary to meet the emission limits;
- the variability of emissions over time;
- the type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- the technical and economic feasibility of possible periodic monitoring methods; and
- the kind of monitoring found on similar units elsewhere.

The Table below summarizes the monitoring requirements.

Table 8. Monitoring

Subject Item*	Requirement (basis)	What is the monitoring?	Why is this monitoring adequate?
COMG 2	VOC <= 90.0 tons per year 12-month rolling sum [Limits to avoid PSD]	Recordkeeping: Daily records of VOC-material usage and natural gas usage; On-going records of VOC materials; monthly calculations of emissions; and recordkeeping	Records of material usage and natural gas combustion can be generated on a daily basis based on written logs. Material content for each material must be determined as required by the Material Content requirement at COMG 2.
COMG 3 Milling units	PM <= varies by airflow Opacity <= 20% [Minn. R. 7011.0715]	See TREAs 14, 15, 16, and 17 for specific monitoring	Other limits at TREA 14, 15, 16 and 17 (and associated monitoring) ensure that this applicable requirement is being met. These other operational limits give each of these units a PTE of 0.50 lb/hr. The lowest applicable rule limit for these units at maximum airflow is 8.69 lb/hr.

Subject Item*	Requirement (basis)	What is the monitoring?	Why is this monitoring adequate?
COMG 4 Units subject to GGG	Process vents: HAPs - Total >= 98% by weight for controlled process vents; for other process vents, actual HAP emissions are limited to 900 kg/yr Equipment leaks: monitoring, detection, and repair [NESHAP GGG]	Process vents with control: temperature monitoring device, temperature measurement, recordkeeping Process vents without control: recordkeeping Equipment leaks: leak detection, inspections, repair, and recordkeeping	Monitoring required by 40 CFR pt. 63, subp. GGG is adequate to demonstrate compliance with the requirements of the standard because this standard was promulgated after November 15, 1990, and post-November 15, 1990, NSPS and NESHAPs contain adequate monitoring requirements.
COMG 6 (Tanks, high shear granulators)	PM <= varies by process weight rate Opacity <= 20% [Minn. R. 7011.0715]	None	All emission units in this group have potential lb PM/hr emissions well below the limit calculated at maximum capacity as shown in Attachment 1 to this TSD. Therefore, the likelihood of violating either of the emission limits is very small.
EQUIs 3, 4, 5, 6, 7, 11, 12 (Boilers)	Filterable PM <= 0.40 lb/mmBtu heat input. Opacity <= 20%, except for one six-minute period per hour of not more than 60%. [Minn. R. 7011.0515]	None	All units use natural gas; therefore, the likelihood of violating either of the emission limits is very small. The Permittee can demonstrate that these units will continue to operate such that emissions are well below the emission limits by only burning natural gas. Design based PTE for each unit, using AP-42, is 0.0075 lb PM/mmBtu compared to the rule limit of 0.40 lb PM/mmBtu.
	Work practice standards [NESHAP DDDDD]	Boiler tune-up every 5 years, recordkeeping	Monitoring required by 40 CFR pt. 63, subp. DDDDD is adequate to demonstrate compliance with the requirements of the standard because this standard was promulgated after November 15, 1990, and post-November 15, 1990, NSPS and NESHAPs contain adequate monitoring requirements.
EQUIs 8, 9, 10 (Boilers)	Work practice standards [NESHAP DDDDD]	Boiler tune-up annually, recordkeeping	Monitoring required by 40 CFR pt. 63, subp. DDDDD is adequate to demonstrate compliance with the requirements of the standard because this standard was promulgated after November 15, 1990, and post-November 15, 1990, NSPS and NESHAPs contain adequate monitoring requirements.
	Records of natural gas combusted [NSPS Dc]	Monthly records of the type and amount of fuel used	Monitoring required by 40 CFR pt. 60, subp. Dc is adequate to demonstrate compliance with the standard because this standard was promulgated after November 15, 1990, and post-November 15, 1990, NSPS and NESHAPs contain adequate monitoring requirements.

Subject Item*	Requirement (basis)	What is the monitoring?	Why is this monitoring adequate?
EQUIs 15, 16, 17, 19 Fluid bed processors EQUI 22 Tablet coater	Requirement to vent to TREA 1 when using VOC-containing materials [Limit to avoid PSD]	Recordkeeping of materials used	Daily records of material usage can be generated on a daily basis documenting whether VOC-containing materials or aqueous materials are used as well as whether emissions are vented to TREA 1. Material content for each material must be determined as required by the Material Content requirement at COMG 2.
EQUI 18 Fluid bed processor EQUIs 23, 24, 25, 26 Tablet coaters	Requirement to use only aqueous solutions [Limit to avoid PSD]	Daily records of solutions/materials used	Records of material usage can be generated on a daily basis. Material content for each material must be determined as required by the Material Content requirement at COMG 2.
EQUIs 15, 16, 17, 18, 19 Fluid bed processors EQUI 22, 23, 24, 25, 26 (Tablet coaters)	PM <= varies with airflow Opacity <= 20 % [Minn. R. 7011.0715]	See TREAs 2-6 and 9-13 for specific monitoring	Other limits at TREAs 2-6 and 9-13 (and associated monitoring) ensure that this applicable requirement is being met. These other operational limits give each of these units a maximum PTE of 0.103 lb PM/hr. The lowest applicable rule limit for these units at maximum airflow is 2.23 lb PM/hr.
EQUIs 27-32, 49- 52 Mills	Face of the collection hood no more than 10 inches from source [Limit to avoid PSD]	Inspection, recordkeeping	Inspections can be done on a daily basis documenting hood alignment.
EQUIs 33 and 34	PM <= varies with airflow Opacity <= 20 percent opacity [Minn. R. 7011.0715]	See TREAs 18 and 19 for specific monitoring	Other limits at TREAs 18 and 19 (and associated monitoring) ensure that this applicable requirement is being met. These other operational limits give each of these units a maximum PTE of 0.03 lb PM/hr. The lowest applicable rule limit for these units at maximum airflow is 0.94 lb PM/hr.
FUGI 1 Equipment leaks	PM <= varies with airflow Opacity <= 20% [Minn. R. 7011.0715]	None	Particulate emissions are not anticipated from equipment leaks; therefore, the likelihood of violating either of the emission limits is very small.

Subject Item*	Requirement (basis)	What is the monitoring?	Why is this monitoring adequate?
TREA 1 Thermal oxidizer	VOC >= 98 % control efficiency Temperature >= 1668 °F 3-hour rolling average [Limit to avoid PSD]	Performance testing, temperature limit, continuous temperature monitoring and recordkeeping, O & M, inspections, calibration, performance testing, recordkeeping	Monitoring based on the Minnesota Performance Standard for Control Equipment, the approved CAM plan and 40 CFR pt. 63, subp. GGG provide a reasonable assurance of compliance. As an other PSEU under CAM, TREA 1 is subject to daily monitoring. This is accomplished using continuous temperature monitoring. In addition, per current MPCA guidance and historical testing on this unit/control, performance testing is required every 5 years. The temperature limit is based on the last MPCA-approved performance test of June 20, 2023. The permit allows the minimum temperature to be re-set using approved replicable methodology (ARM). The ARM re-sets the temperature limit based on performance testing that demonstrates compliance. In this instance, as long as the Permittee is implementing the ARM as required by the permit, the permit does not need to be reopened to revise the control equipment parameter limit. The Notice of Compliance that approves the new limit using an ARM will be filed with the permit.
	HAPs-Total >= 98 % control efficiency Temperature >= 1668 °F 3-hour rolling average [NESHAP GGG]	Continuous temperature monitoring and recordkeeping	Monitoring required by 40 CFR pt. 63, subp. GGG is adequate to demonstrate compliance with the requirements of the standard because this standard was promulgated after November 15, 1990, and post-November 15, 1990, NSPS and NESHAPs contain adequate monitoring requirements.
TREAs 2-6, 9-13	PM >= 99 % control efficiency $PM_{10}/PM_{2.5}$ >= 93 % control efficiency Pressure Drop >= 0.1 and <= 6.0 inH_2O [Limit to avoid PSD]	Daily and periodic inspections, daily pressure drop checks, operation and maintenance, corrective actions, and recordkeeping	Monitoring based on the Minnesota Performance Standard for Control Equipment is adequate to have a reasonable assurance of compliance.
TREA 14, 15, 16, 17	PM >= 79 % control efficiency $PM_{10}/PM_{2.5}$ >= 74 % control efficiency Pressure Drop >= 0.1 and <= 6.0 inH_2O [Limit to avoid PSD]	Daily and periodic inspections, daily pressure drop checks, operation and maintenance, corrective actions, hood certifications, annual hood evaluation, and recordkeeping	Monitoring based on the Minnesota Performance Standard for Control Equipment is adequate to have a reasonable assurance of compliance.

Subject Item*	Requirement (basis)	What is the monitoring?	Why is this monitoring adequate?
TREA 18, 19	PM >= 99 % control efficiency $PM_{10}/PM_{2.5}$ >= 93 % control efficiency Pressure Drop >= 0.1 and <= 7.0 inH_2O [Limit to avoid PSD]	Daily and periodic inspections, daily pressure drop checks, operation and maintenance, corrective actions, and recordkeeping	Monitoring based on the Minnesota Performance Standard for Control Equipment is adequate to have a reasonable assurance of compliance.

*Location of the requirement in the permit (e.g., EQUI 1, STRU 2, etc.).

3.4 Insignificant activities

Bora Pharmaceuticals Inc. has several operations which are classified as insignificant activities under the MPCA's permitting rules. These are listed in Appendix A to the permit.

The permit is required to include periodic monitoring for all emissions units, including insignificant activities, per EPA guidance. The insignificant activities at this Facility are only subject to general applicable requirements. Using the criteria outlined earlier in this TSD, the following table documents the justification why no additional periodic monitoring is necessary for the current insignificant activities. See Attachment 1 of this TSD for PTE information for the insignificant activities.

Table 7. Insignificant activities

Insignificant activity	General applicable emission limit	Discussion
Emissions from a laboratory, as defined in Minn. R. 7007.1300, subp. 3(D)	PM, variable depending on airflow Opacity <= 20% (Minn. R. 7011.0715)	The Permittee operates an analytical lab and a product development lab. These are very small, intermittent, bench-top operations that typically do not have any emissions. It is highly unlikely that they could violate the applicable requirement.
Individual units with potential emissions less than 2000 lb/year of certain pollutants	PM, variable depending on airflow Opacity <= 20% (Minn. R. 7011.0715)	These are six natural gas combustion units and particulate-emitting activities, including: two dry material dispensing units; tablet counter; two encapsulation units; packaging for a powder line; packaging for a canning line; and weighing activities. For the natural gas units, based on the fuels used and EPA published emissions factors, it is highly unlikely that they could violate the applicable requirement. For the particulate-emitting activities, based on potential emission calculations it is highly unlikely that they could violate the applicable requirement.

3.5 Permit organization and standard language

Generally, this permit meets the MPCA Tempo Guidance for ordering and grouping of requirements as well as the use of permit appendices.

When amending or reissuing an air permit, MPCA staff evaluate standard permit language in the permit. If the standard language has been changed in the Tempo database since the last permit was issued, staff need to decide how to proceed for each revised condition. For this permit action, all standard language was updated in the permit.

3.6 Comments received

This section will be completed after the referenced review periods.

Public Notice Period: [start date] – [end date]
EPA Review Period: [start date] – [end date]

4. Permit fee assessment

This permit action is the reissuance of an individual Part 70; therefore, no application fees apply under Minn. R. 7002.0016, subp. 1. An administrative amendment is rolled into this permit action for which application fees apply, however, no additional points apply.

5. Conclusion

Based on the information provided by Bora Pharmaceuticals Inc. the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 05301286-104 and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff members on permit team: Sarah Sevcik (permit engineer)
Adriane Lorsung (peer reviewer)
Joe Handtmann (data coordinator)
Beckie Olson (permit writing assistant)
Ryan Decker (administrative support)
Tim Schwarz (enforcement)
Marc Severin (compliance)

Tempo Activities: Administrative Amendment (IND20250002), Part 70 Reissuance (IND20250001)

Attachments:
1. PTE summary calculation spreadsheets
2. Subject item inventory and facility requirements
3. CAM Plan

Attachment 1: Potential to emit summary and calculation spreadsheets

1a) AQ Facility ID number: 05301286 1b) Agency Interest ID number: 89958

2) Facility name: Bora Pharmaceuticals LLC

Emissions by Source Table

Emissions by Source Table

3b) Tempo SI ID No.:		EQUI 3			**3b)** Tempo SI ID No.:		EQUI 4			**3b)** Tempo SI ID No.:		EQUI 5			**3b)** Tempo SI ID No.:		EQUI 6		
3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:				
3c)	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential		
Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited
PM		0.02	0.10	0.10	PM		0.02	0.10	0.10	PM		0.02	0.07	0.07	PM		0.02	0.07	0.07
PM10		0.02	0.10	0.10	PM10		0.02	0.10	0.10	PM10		0.02	0.07	0.07	PM10		0.02	0.07	0.07
PM2.5		0.02	0.10	0.10	PM2.5		0.02	0.10	0.10	PM2.5		0.02	0.07	0.07	PM2.5		0.02	0.07	0.07
NOx		0.29	1.29	1.29	NOx		0.29	1.29	1.29	NOx		0.21	0.90	0.90	NOx		0.21	0.90	0.90
SOx		1.8E-03	0.01	0.01	SOx		1.8E-03	0.01	0.01	SOx		1.2E-03	0.01	0.01	SOx		1.2E-03	0.01	0.01
VOC		0.02	0.07		VOC		0.02	0.07		VOC		0.01	0.05		VOC		0.01	0.05	0.05
CO		0.25	1.08	1.08	CO		0.25	1.08	1.08	CO		0.17	0.76	0.76	CO		0.17	0.76	0.76
Arsenic		5.9E-07	2.6E-06	2.6E-06	Arsenic		5.9E-07	2.6E-06	2.6E-06	Arsenic		4.1E-07	1.8E-06	1.8E-06	Arsenic		4.1E-07	1.8E-06	1.8E-06
Benzene		6.2E-06	2.7E-05	2.7E-05	Benzene		6.2E-06	2.7E-05	2.7E-05	Benzene		4.3E-06	1.9E-05	1.9E-05	Benzene		4.3E-06	1.9E-05	1.9E-05
Beryllium		3.5E-08	1.5E-07	1.5E-07	Beryllium		3.5E-08	1.5E-07	1.5E-07	Beryllium		2.5E-08	1.1E-07	1.1E-07	Beryllium		2.5E-08	1.1E-07	1.1E-07
Cadmium		3.2E-06	1.4E-05	1.4E-05	Cadmium		3.2E-06	1.4E-05	1.4E-05	Cadmium		2.3E-06	9.9E-06	9.9E-06	Cadmium		2.3E-06	9.9E-06	9.9E-06
Chromium		4.1E-06	1.8E-05	1.8E-05	Chromium		4.1E-06	1.8E-05	1.8E-05	Chromium		2.9E-06	1.3E-05	1.3E-05	Chromium		2.9E-06	1.3E-05	1.3E-05
Cobalt		2.5E-07	1.1E-06	1.1E-06	Cobalt		2.5E-07	1.1E-06	1.1E-06	Cobalt		1.7E-07	7.6E-07	7.6E-07	Cobalt		1.7E-07	7.6E-07	7.6E-07
Dichlorobenzene		3.5E-06	1.5E-05	1.5E-05	Dichlorobenzene		3.5E-06	1.5E-05	1.5E-05	Dichlorobenzene		2.5E-06	1.1E-05	1.1E-05	Dichlorobenzene		2.5E-06	1.1E-05	1.1E-05
Formaldehyde		2.2E-04	9.7E-04	9.7E-04	Formaldehyde		2.2E-04	9.7E-04	9.7E-04	Formaldehyde		1.5E-04	6.8E-04	6.8E-04	Formaldehyde		1.5E-04	6.8E-04	6.8E-04
Hexane		0.01	0.02	0.02	Hexane		0.01	0.02	0.02	Hexane		3.7E-03	0.02	0.02	Hexane		3.7E-03	0.02	0.02
Lead		1.5E-06	6.4E-06	6.4E-06	Lead		1.5E-06	6.4E-06	6.4E-06	Lead		1.0E-06	4.5E-06	4.5E-06	Lead		1.0E-06	4.5E-06	4.5E-06
Manganese		1.1E-06	4.9E-06	4.9E-06	Manganese		1.1E-06	4.9E-06	4.9E-06	Manganese		7.8E-07	3.4E-06	3.4E-06	Manganese		7.8E-07	3.4E-06	3.4E-06
Mercury		7.6E-07	3.3E-06	3.3E-06	Mercury		7.6E-07	3.3E-06	3.3E-06	Mercury		5.4E-07	2.3E-06	2.3E-06	Mercury		5.4E-07	2.3E-06	2.3E-06
Naphthalene		1.8E-06	7.9E-06	7.9E-06	Naphthalene		1.8E-06	7.9E-06	7.9E-06	Naphthalene		1.3E-06	5.5E-06	5.5E-06	Naphthalene		1.3E-06	5.5E-06	5.5E-06
Nickel		6.2E-06	2.7E-05	2.7E-05	Nickel		6.2E-06	2.7E-05	2.7E-05	Nickel		4.3E-06	1.9E-05	1.9E-05	Nickel		4.3E-06	1.9E-05	1.9E-05
POM		2.1E-06	9.0E-06	9.0E-06	POM		2.1E-06	9.0E-06	9.0E-06	POM		1.4E-06	6.3E-06	6.3E-06	POM		1.4E-06	6.3E-06	6.3E-06
Selenium		7.1E-08	3.1E-07	3.1E-07	Selenium		7.1E-08	3.1E-07	3.1E-07	Selenium		4.9E-08	2.2E-07	2.2E-07	Selenium		4.9E-08	2.2E-07	2.2E-07
Toluene		1.0E-05	4.4E-05	4.4E-05	Toluene		1.0E-05	4.4E-05	4.4E-05	Toluene		7.0E-06	3.1E-05	3.1E-05	Toluene		7.0E-06	3.1E-05	3.1E-05
CO2		352.94	1,546	1,546	CO2		352.94	1,546	1,546	CO2		247.06	1,082	1,082	CO2		247.06	1,082	1,082
CH4		0.01	0.03	0.03	CH4		0.01	0.03	0.03	CH4		4.7E-03	0.02	0.02	CH4		4.7E-03	0.02	0.02
N2O		0.01	0.03	0.03	N2O		0.01	0.03	0.03	N2O		4.5E-03	0.02	0.02	N2O		4.5E-03	0.02	0.02
CO2-e		354.85	1,554	1,554	CO2-e		354.85	1,554	1,554	CO2-e		248.39	1,088	1,088	CO2-e		248.39	1,088	1,088
Methanol					Methanol					Methanol					Methanol				
Total HAPs		0.01	0.02	0.02	Total HAPs		0.01	0.02	0.02	Total HAPs		3.9E-03	0.02	0.02	Total HAPs		3.9E-03	0.02	0.02

Emissions by Source Table

3b) Tempo SI ID No.:		EQUI 7			**3b)** Tempo SI ID No.:		EQUI 8			**3b)** Tempo SI ID No.:		EQUI 9			**3b)** Tempo SI ID No.:		EQUI 10	
3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:			
3c)	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential	
Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted
PM		0.02	0.11	0.11	PM		0.12	0.55	0.55	PM		0.12	0.55	0.55	PM		0.18	0.81
PM10		0.02	0.11	0.11	PM10		0.12	0.55	0.55	PM10		0.12	0.55	0.55	PM10		0.18	0.81
PM2.5		0.02	0.11	0.11	PM2.5		0.12	0.55	0.55	PM2.5		0.12	0.55	0.55	PM2.5		0.18	0.81
NOx		0.33	1.43	1.43	NOx		1.64	7.19	7.19	NOx		1.64	7.19	7.19	NOx		2.42	10.60
SOx		2.0E-03	0.01	0.01	SOx		0.01	0.04	0.04	SOx		0.01	0.04	0.04	SOx		0.01	0.06
VOC		0.02	0.08		VOC		0.09	0.40		VOC		0.09	0.40		VOC		0.13	0.58
CO		0.27	1.20	1.20	CO		1.38	6.04	6.04	CO		1.38	6.04	6.04	CO		2.03	8.90
Arsenic		6.5E-07	2.9E-06	2.9E-06	Arsenic		3.3E-06	1.4E-05	1.4E-05	Arsenic		3.3E-06	1.4E-05	1.4E-05	Arsenic		4.8E-06	2.1E-05
Benzene		6.9E-06	3.0E-05	3.0E-05	Benzene		3.4E-05	1.5E-04	1.5E-04	Benzene		3.4E-05	1.5E-04	1.5E-04	Benzene		5.1E-05	2.2E-04
Beryllium		3.9E-08	1.7E-07	1.7E-07	Beryllium		2.0E-07	8.6E-07	8.6E-07	Beryllium		2.0E-07	8.6E-07	8.6E-07	Beryllium		2.9E-07	1.3E-06
Cadmium		3.6E-06	1.6E-05	1.6E-05	Cadmium		1.8E-05	7.9E-05	7.9E-05	Cadmium		1.8E-05	7.9E-05	7.9E-05	Cadmium		2.7E-05	1.2E-04
Chromium		4.6E-06	2.0E-05	2.0E-05	Chromium		2.3E-05	1.0E-04	1.0E-04	Chromium		2.3E-05	1.0E-04	1.0E-04	Chromium		3.4E-05	1.5E-04
Cobalt		2.7E-07	1.2E-06	1.2E-06	Cobalt		1.4E-06	6.0E-06	6.0E-06	Cobalt		1.4E-06	6.0E-06	6.0E-06	Cobalt		2.0E-06	8.9E-06
Dichlorobenzene		3.9E-06	1.7E-05	1.7E-05	Dichlorobenzene		2.0E-05	8.6E-05	8.6E-05	Dichlorobenzene		2.0E-05	8.6E-05	8.6E-05	Dichlorobenzene		2.9E-05	1.3E-04
Formaldehyde		2.4E-04	1.1E-03	1.1E-03	Formaldehyde		1.2E-03	0.01	0.01	Formaldehyde		1.2E-03	0.01	0.01	Formaldehyde		1.8E-03	0.01
Hexane		0.01	0.03	0.03	Hexane		0.03	0.13	0.13	Hexane		0.03	0.13	0.13	Hexane		0.04	0.19
Lead		1.6E-06	7.2E-06	7.2E-06	Lead		8.2E-06	3.6E-05	3.6E-05	Lead		8.2E-06	3.6E-05	3.6E-05	Lead		1.2E-05	5.3E-05
Manganese		1.2E-06	5.4E-06	5.4E-06	Manganese		6.2E-06	2.7E-05	2.7E-05	Manganese		6.2E-06	2.7E-05	2.7E-05	Manganese		9.2E-06	4.0E-05
Mercury		8.5E-07	3.7E-06	3.7E-06	Mercury		4.3E-06	1.9E-05	1.9E-05	Mercury		4.3E-06	1.9E-05	1.9E-05	Mercury		6.3E-06	2.8E-05
Naphthalene		2.0E-06	8.7E-06	8.7E-06	Naphthalene		1.0E-05	4.4E-05	4.4E-05	Naphthalene		1.0E-05	4.4E-05	4.4E-05	Naphthalene		1.5E-05	6.5E-05
Nickel		6.9E-06	3.0E-05	3.0E-05	Nickel		3.4E-05	1.5E-04	1.5E-04	Nickel		3.4E-05	1.5E-04	1.5E-04	Nickel		5.1E-05	2.2E-04
POM		2.3E-06	1.0E-05	1.0E-05	POM		1.1E-05	5.0E-05	5.0E-05	POM		1.1E-05	5.0E-05	5.0E-05	POM		1.7E-05	7.4E-05
Selenium		7.8E-08	3.4E-07	3.4E-07	Selenium		3.9E-07	1.7E-06	1.7E-06	Selenium		3.9E-07	1.7E-06	1.7E-06	Selenium		5.8E-07	2.5E-06
Toluene		1.1E-05	4.9E-05	4.9E-05	Toluene		5.6E-05	2.4E-04	2.4E-04	Toluene		5.6E-05	2.4E-04	2.4E-04	Toluene		8.2E-05	3.6E-04
CO2		391.92	1,717	1,717	CO2		1,969	8,625	8,625	CO2		1,969	8,625	8,625	CO2		2,904	12,719
CH4		0.01	0.03	0.03	CH4		0.04	0.17	0.17	CH4		0.04	0.17	0.17	CH4		0.06	0.24
N2O		0.01	0.03	0.03	N2O		0.04	0.16	0.16	N2O		0.04	0.16	0.16	N2O		0.05	0.23
CO2-e		394.03	1,726	1,726	CO2-e		1,980	8,672	8,672	CO2-e		1,980	8,672	8,672	CO2-e		2,920	12,788
Methanol					Methanol					Methanol					Methanol			
Total HAPs		0.01	0.03	0.03	Total HAPs		0.03	0.14	0.14	Total HAPs		0.03	0.14	0.14	Total HAPs		0.05	0.20

Emissions by Source Table

	3b) Tempo SI ID No.:		EQUI 11			**3b)** Tempo SI ID No.:		EQUI 12			**3b)** Tempo SI ID No.:		TREA 1			**3b)** Tempo SI ID No.:		EQUI 15
	3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:		
	3c)	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3**
tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour
0.81	PM		0.03	0.13	0.13	PM		0.03	0.13	0.13	PM		0.22	0.98	0.98	PM		0.08
0.81	PM10		0.03	0.13	0.13	PM10		0.03	0.13	0.13	PM10		0.22	0.98	0.98	PM10		0.08
0.81	PM2.5		0.03	0.13	0.13	PM2.5		0.03	0.13	0.13	PM2.5		0.22	0.98	0.98	PM2.5		0.08
10.60	NOx		0.39	1.72	1.72	NOx		0.39	1.72	1.72	NOx		2.94	12.88	12.88	NOx		
0.06	SOx		2.4E-03	0.01	0.01	SOx		2.4E-03	0.01	0.01	SOx		0.02	0.08	0.08	SOx		
	VOC		0.02	0.09		VOC		0.02	0.09		VOC		0.16	0.71		VOC		3.31
8.90	CO		0.33	1.44	1.44	CO		0.33	1.44	1.44	CO		2.47	10.82	10.82	CO		
2.1E-05	Arsenic		7.8E-07	3.4E-06	3.4E-06	Arsenic		7.8E-07	3.4E-06	3.4E-06	Arsenic		5.9E-06	2.6E-05	2.6E-05	Arsenic		
2.2E-04	Benzene		8.2E-06	3.6E-05	3.6E-05	Benzene		8.2E-06	3.6E-05	3.6E-05	Benzene		6.2E-05	2.7E-04	2.7E-04	Benzene		
1.3E-06	Beryllium		4.7E-08	2.1E-07	2.1E-07	Beryllium		4.7E-08	2.1E-07	2.1E-07	Beryllium		3.5E-07	1.5E-06	1.5E-06	Beryllium		
1.2E-04	Cadmium		4.3E-06	1.9E-05	1.9E-05	Cadmium		4.3E-06	1.9E-05	1.9E-05	Cadmium		3.2E-05	1.4E-04	1.4E-04	Cadmium		
1.5E-04	Chromium		5.5E-06	2.4E-05	2.4E-05	Chromium		5.5E-06	2.4E-05	2.4E-05	Chromium		4.1E-05	1.8E-04	1.8E-04	Chromium		
8.9E-06	Cobalt		3.3E-07	1.4E-06	1.4E-06	Cobalt		3.3E-07	1.4E-06	1.4E-06	Cobalt		2.5E-06	1.1E-05	1.1E-05	Cobalt		
1.3E-04	Dichlorobenzene		4.7E-06	2.1E-05	2.1E-05	Dichlorobenzene		4.7E-06	2.1E-05	2.1E-05	Dichlorobenzene		3.5E-05	1.5E-04	1.5E-04	Dichlorobenzene		
0.01	Formaldehyde		2.9E-04	1.3E-03	1.3E-03	Formaldehyde		2.9E-04	1.3E-03	1.3E-03	Formaldehyde		3.5E-05	1.5E-04	1.5E-04	Formaldehyde		
0.19	Hexane		0.01	0.03	0.03	Hexane		0.01	0.03	0.03	Hexane		2.2E-03	0.01	0.01	Hexane		
5.3E-05	Lead		2.0E-06	8.6E-06	8.6E-06	Lead		2.0E-06	8.6E-06	8.6E-06	Lead		0.05	0.23	0.23	Lead		
4.0E-05	Manganese		1.5E-06	6.5E-06	6.5E-06	Manganese		1.5E-06	6.5E-06	6.5E-06	Manganese		1.5E-05	6.4E-05	6.4E-05	Manganese		
2.8E-05	Mercury		1.0E-06	4.5E-06	4.5E-06	Mercury		1.0E-06	4.5E-06	4.5E-06	Mercury		1.1E-05	4.9E-05	4.9E-05	Mercury		
6.5E-05	Naphthalene		2.4E-06	1.0E-05	1.0E-05	Naphthalene		2.4E-06	1.0E-05	1.0E-05	Naphthalene		7.6E-06	3.3E-05	3.3E-05	Naphthalene		
2.2E-04	Nickel		8.2E-06	3.6E-05	3.6E-05	Nickel		8.2E-06	3.6E-05	3.6E-05	Nickel		1.8E-05	7.9E-05	7.9E-05	Nickel		
7.4E-05	POM		2.7E-06	1.2E-05	1.2E-05	POM		2.7E-06	1.2E-05	1.2E-05	POM		6.2E-05	2.7E-04	2.7E-04	POM		
2.5E-06	Selenium		9.4E-08	4.1E-07	4.1E-07	Selenium		9.4E-08	4.1E-07	4.1E-07	Selenium		2.1E-05	9.0E-05	9.0E-05	Selenium		
3.6E-04	Toluene		1.3E-05	5.8E-05	5.8E-05	Toluene		1.3E-05	5.8E-05	5.8E-05	Toluene		7.1E-07	3.1E-06	3.1E-06	Toluene		
12,719	CO2		470.59	2,061	2,061	CO2		470.59	2,061	2,061	CO2		3,529	0.24	0.24	CO2		
0.24	CH4		0.01	0.04	0.04	CH4		0.01	0.04	0.04	CH4		0.07	0.30	0.30	CH4		
0.23	N2O		0.01	0.04	0.04	N2O		0.01	0.04	0.04	N2O		0.07	0.30	0.30	N2O		
12,788	CO2-e		473.13	2,072	2,072	CO2-e		473.13	2,072	2,072	CO2-e		3,548	15,542	15,542	CO2-e		
	Methanol					Methanol					Methanol					Methanol		3.31
0.20	Total HAPs		0.01	0.03	0.03	Total HAPs		0.01	0.03	0.03	Total HAPs		0.06	0.24	0.24	Total HAPs		3.31

Emissions by Source Table

Emissions by Source Table

		3b) Tempo SI ID No.:		EQUI 16			**3b)** Tempo SI ID No.:		EQUI 17			**3b)** Tempo SI ID No.:		EQUI 18			**3b)** Tempo SI ID No.:		EQUI 19
		3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:		
e) Potential		**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	
tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour
33.79	0.34	PM		0.10	45.05	0.45	PM		0.10	45.05	0.45	PM		0.05	22.53	0.23	PM		0.05
4.83	0.34	PM10		0.10	6.44	0.45	PM10		0.10	6.44	0.45	PM10		0.05	3.22	0.23	PM10		0.05
4.83	0.34	PM2.5		0.10	6.44	0.45	PM2.5		0.10	6.44	0.45	PM2.5		0.05	3.22	0.23	PM2.5		0.05
		NOx					NOx					NOx					NOx		
		SOx					SOx					SOx					SOx		
724.34		VOC		5.29	1,159		VOC		5.29	1,159		VOC					VOC		0.66
		CO					CO					CO					CO		
		Arsenic					Arsenic					Arsenic					Arsenic		
		Benzene					Benzene					Benzene					Benzene		
		Beryllium					Beryllium					Beryllium					Beryllium		
		Cadmium					Cadmium					Cadmium					Cadmium		
		Chromium					Chromium					Chromium					Chromium		
		Cobalt					Cobalt					Cobalt					Cobalt		
		Dichlorobenzene					Dichlorobenzene					Dichlorobenzene					Dichlorobenzene		
		Formaldehyde					Formaldehyde					Formaldehyde					Formaldehyde		
		Hexane					Hexane					Hexane					Hexane		
		Lead					Lead					Lead					Lead		
		Manganese					Manganese					Manganese					Manganese		
		Mercury					Mercury					Mercury					Mercury		
		Naphthalene					Naphthalene					Naphthalene					Naphthalene		
		Nickel					Nickel					Nickel					Nickel		
		POM					POM					POM					POM		
		Selenium					Selenium					Selenium					Selenium		
		Toluene					Toluene					Toluene					Toluene		
		CO2					CO2					CO2					CO2		
		CH4					CH4					CH4					CH4		
		N2O					N2O					N2O					N2O		
		CO2-e					CO2-e					CO2-e					CO2-e		
724.34		Methanol		5.29	1,159		Methanol		5.29	1,159		Methanol					Methanol		0.66
724.34		Total HAPs		5.29	1,159		Total HAPs		5.29	1,159		Total HAPs					Total HAPs		0.66

Emissions by Source Table

		3b) Tempo SI ID No.:		EQUI 22			**3b)** Tempo SI ID No.:		EQUI 23			**3b)** Tempo SI ID No.:		EQUI 24			**3b)** Tempo SI ID No.:		EQUI 25
		3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:		
3e) Potential		**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3**
tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour
22.53	0.23	PM		0.07	30.03	0.30	PM		0.07	30.03	0.30	PM		0.07	30.03	0.30	PM		0.07
3.22	0.23	PM10		0.07	4.29	0.30	PM10		0.07	4.29	0.30	PM10		0.07	4.29	0.30	PM10		0.07
3.22	0.23	PM2.5		0.07	4.29	0.30	PM2.5		0.07	4.29	0.30	PM2.5		0.07	4.29	0.30	PM2.5		0.07
		NOx					NOx					NOx					NOx		
		SOx					SOx					SOx					SOx		
144.87		VOC		0.66	724.34		VOC					VOC					VOC		
		CO					CO					CO					CO		
		Arsenic					Arsenic					Arsenic					Arsenic		
		Benzene					Benzene					Benzene					Benzene		
		Beryllium					Beryllium					Beryllium					Beryllium		
		Cadmium					Cadmium					Cadmium					Cadmium		
		Chromium					Chromium					Chromium					Chromium		
		Cobalt					Cobalt					Cobalt					Cobalt		
		Dichlorobenzene					Dichlorobenzene					Dichlorobenzene					Dichlorobenzene		
		Formaldehyde					Formaldehyde					Formaldehyde					Formaldehyde		
		Hexane					Hexane					Hexane					Hexane		
		Lead					Lead					Lead					Lead		
		Manganese					Manganese					Manganese					Manganese		
		Mercury					Mercury					Mercury					Mercury		
		Naphthalene					Naphthalene					Naphthalene					Naphthalene		
		Nickel					Nickel					Nickel					Nickel		
		POM					POM					POM					POM		
		Selenium					Selenium					Selenium					Selenium		
		Toluene					Toluene					Toluene					Toluene		
		CO2					CO2					CO2					CO2		
		CH4					CH4					CH4					CH4		
		N2O					N2O					N2O					N2O		
		CO2-e					CO2-e					CO2-e					CO2-e		
144.87		Methanol					Methanol					Methanol					Methanol		
724.34		Total HAPs					Total HAPs					Total HAPs					Total HAPs		

Emissions by Source Table

		3b) Tempo SI ID No.:		EQUI 26			**3b)** Tempo SI ID No.:		EQUI 27			**3b)** Tempo SI ID No.:		EQUI 28			**3b)** Tempo SI ID No.:		EQUI 29
		3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:		
e) Potential		**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e**
tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour
30.03	0.30	PM		0.07	30.03	0.30	PM		0.50	10.43	2.17	PM		0.50	10.43	2.17	PM		0.50
4.29	0.30	PM10		0.07	4.29	0.30	PM10		0.61	10.43	2.67	PM10		0.61	10.43	2.67	PM10		0.61
4.29	0.30	PM2.5		0.07	4.29	0.30	PM2.5		0.61	10.43	2.67	PM2.5		0.61	10.43	2.67	PM2.5		0.61
		NOx					NOx					NOx					NOx		
		SOx					SOx					SOx					SOx		
		VOC					VOC					VOC					VOC		
		CO					CO					CO					CO		
		Arsenic					Arsenic					Arsenic					Arsenic		
		Benzene					Benzene					Benzene					Benzene		
		Beryllium					Beryllium					Beryllium					Beryllium		
		Cadmium					Cadmium					Cadmium					Cadmium		
		Chromium					Chromium					Chromium					Chromium		
		Cobalt					Cobalt					Cobalt					Cobalt		
		Dichlorobenzene					Dichlorobenzene					Dichlorobenzene					Dichlorobenzene		
		Formaldehyde					Formaldehyde					Formaldehyde					Formaldehyde		
		Hexane					Hexane					Hexane					Hexane		
		Lead					Lead					Lead					Lead		
		Manganese					Manganese					Manganese					Manganese		
		Mercury					Mercury					Mercury					Mercury		
		Naphthalene					Naphthalene					Naphthalene					Naphthalene		
		Nickel					Nickel					Nickel					Nickel		
		POM					POM					POM					POM		
		Selenium					Selenium					Selenium					Selenium		
		Toluene					Toluene					Toluene					Toluene		
		CO2					CO2					CO2					CO2		
		CH4					CH4					CH4					CH4		
		N2O					N2O					N2O					N2O		
		CO2-e					CO2-e					CO2-e					CO2-e		
		Methanol					Methanol					Methanol					Methanol		
		Total HAPs					Total HAPs					Total HAPs					Total HAPs		

Emissions by Source Table **Emissions by Source Table** **Emissions by Source Table**

		3b) Tempo SI ID No.:		EQUI 30			**3b)** Tempo SI ID No.:		EQUI 31			**3b)** Tempo SI ID No.:		EQUI 32			**3b)** Tempo SI ID No.:		EQUI 33	
		3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:			
e) Potential		**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potentia	
tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted
10.43	2.17	PM		0.50	10.43	2.17	PM		0.50	10.43	2.17	PM		0.50	10.43	2.17	PM		0.03	13.25
10.43	2.67	PM10		0.61	10.43	2.67	PM10		0.61	10.43	2.67	PM10		0.61	10.43	2.67	PM10		0.03	1.89
10.43	2.67	PM2.5		0.61	10.43	2.67	PM2.5		0.61	10.43	2.67	PM2.5		0.61	10.43	2.67	PM2.5		0.03	1.89
		NOx					NOx					NOx					NOx			
		SOx					SOx					SOx					SOx			
		VOC					VOC					VOC					VOC		45.94	201.21
		CO					CO					CO					CO			
		Arsenic					Arsenic					Arsenic					Arsenic			
		Benzene					Benzene					Benzene					Benzene			
		Beryllium					Beryllium					Beryllium					Beryllium			
		Cadmium					Cadmium					Cadmium					Cadmium			
		Chromium					Chromium					Chromium					Chromium			
		Cobalt					Cobalt					Cobalt					Cobalt			
		Dichlorobenzene					Dichlorobenzene					Dichlorobenzene					Dichlorobenzene			
		Formaldehyde					Formaldehyde					Formaldehyde					Formaldehyde			
		Hexane					Hexane					Hexane					Hexane			
		Lead					Lead					Lead					Lead			
		Manganese					Manganese					Manganese					Manganese			
		Mercury					Mercury					Mercury					Mercury			
		Naphthalene					Naphthalene					Naphthalene					Naphthalene			
		Nickel					Nickel					Nickel					Nickel			
		POM					POM					POM					POM			
		Selenium					Selenium					Selenium					Selenium			
		Toluene					Toluene					Toluene					Toluene			
		CO2					CO2					CO2					CO2			
		CH4					CH4					CH4					CH4			
		N2O					N2O					N2O					N2O			
		CO2-e					CO2-e					CO2-e					CO2-e			
		Methanol					Methanol					Methanol					Methanol			
		Total HAPs					Total HAPs					Total HAPs					Total HAPs			

Emissions by Source Table

	3b) Tempo SI ID No.:		EQUI 34			**3b)** Tempo SI ID No.:		EQUI 43			**3b)** Tempo SI ID No.:		EQUI 44			**3b)** Tempo SI ID No.:		EQUI 45	
	3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:			
ıl	**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potentia	
tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted
0.13	PM		0.02	8.26	0.08	PM		0.30	1.30	1.30	PM		0.30	1.30	1.30	PM		0.43	1.88
0.13	PM10		0.02	1.18	0.08	PM10		0.25	1.11	1.11	PM10		0.25	1.11	1.11	PM10		0.36	1.60
0.13	PM2.5		0.02	1.18	0.08	PM2.5		0.25	1.11	1.11	PM2.5		0.25	1.11	1.11	PM2.5		0.36	1.60
	NOx					NOx					NOx					NOx			
	SOx					SOx					SOx					SOx			
	VOC		19.85	86.92		VOC		0.46	2.02		VOC		0.46	2.02		VOC		0.67	2.91
	CO					CO					CO					CO			
	Arsenic					Arsenic					Arsenic					Arsenic			
	Benzene					Benzene					Benzene					Benzene			
	Beryllium					Beryllium					Beryllium					Beryllium			
	Cadmium					Cadmium					Cadmium					Cadmium			
	Chromium					Chromium					Chromium					Chromium			
	Cobalt					Cobalt					Cobalt					Cobalt			
	Dichlorobenzene					Dichlorobenzene					Dichlorobenzene					Dichlorobenzene			
	Formaldehyde					Formaldehyde					Formaldehyde					Formaldehyde			
	Hexane					Hexane					Hexane					Hexane			
	Lead					Lead					Lead					Lead			
	Manganese					Manganese					Manganese					Manganese			
	Mercury					Mercury					Mercury					Mercury			
	Naphthalene					Naphthalene					Naphthalene					Naphthalene			
	Nickel					Nickel					Nickel					Nickel			
	POM					POM					POM					POM			
	Selenium					Selenium					Selenium					Selenium			
	Toluene					Toluene					Toluene					Toluene			
	CO2					CO2					CO2					CO2			
	CH4					CH4					CH4					CH4			
	N2O					N2O					N2O					N2O			
	CO2-e					CO2-e					CO2-e					CO2-e			
	Methanol					Methanol		0.46	2.02		Methanol		0.46	2.02		Methanol		0.67	2.91
	Total HAPs					Total HAPs		0.46	2.02		Total HAPs		0.46	2.02		Total HAPs		0.67	2.91

Emissions by Source Table

Emissions by Source Table

	3b) Tempo SI ID No.:		EQUI 46			**3b)** Tempo SI ID No.:		EQUI 47			**3b)** Tempo SI ID No.:		EQUI 48			**3b)** Tempo SI ID No.:		EQUI 49	
	3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:			
l	**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potentia	
tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted
1.88	PM		0.43	1.88	1.88	PM		0.05	0.20	0.20	PM					PM		0.50	10.43
1.60	PM10		0.36	1.60	1.60	PM10		0.04	0.17	0.17	PM10					PM10		0.61	10.43
1.60	PM2.5		0.36	1.60	1.60	PM2.5		0.04	0.17	0.17	PM2.5					PM2.5		0.61	10.43
	NOx					NOx					NOx					NOx			
	SOx					SOx					SOx					SOx			
	VOC		0.67	2.91		VOC		0.07	0.31		VOC		1.38	4.73		VOC			
	CO					CO					CO					CO			
	Arsenic					Arsenic					Arsenic					Arsenic			
	Benzene					Benzene					Benzene					Benzene			
	Beryllium					Beryllium					Beryllium					Beryllium			
	Cadmium					Cadmium					Cadmium					Cadmium			
	Chromium					Chromium					Chromium					Chromium			
	Cobalt					Cobalt					Cobalt					Cobalt			
	Dichlorobenzene					Dichlorobenzene					Dichlorobenzene					Dichlorobenzene			
	Formaldehyde					Formaldehyde					Formaldehyde					Formaldehyde			
	Hexane					Hexane					Hexane					Hexane			
	Lead					Lead					Lead					Lead			
	Manganese					Manganese					Manganese					Manganese			
	Mercury					Mercury					Mercury					Mercury			
	Naphthalene					Naphthalene					Naphthalene					Naphthalene			
	Nickel					Nickel					Nickel					Nickel			
	POM					POM					POM					POM			
	Selenium					Selenium					Selenium					Selenium			
	Toluene					Toluene					Toluene					Toluene			
	CO2					CO2					CO2					CO2			
	CH4					CH4					CH4					CH4			
	N2O					N2O					N2O					N2O			
	CO2-e					CO2-e					CO2-e					CO2-e			
	Methanol		0.67	2.91		Methanol					Methanol					Methanol			
	Total HAPs		0.67	2.91		Total HAPs					Total HAPs					Total HAPs			

Emissions by Source Table

	3b) Tempo SI ID No.:		EQUI 50			**3b)** Tempo SI ID No.:		EQUI 51			**3b)** Tempo SI ID No.:		EQUI 52				**3b)** Tempo SI ID No.:		EQUI 53	
	3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:						**3b)** Delta ID No.:			
l	**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3f)**	**3c)**	**3d)**	**3e)** Potentia	
tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited		Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted
2.17	PM		0.50	10.43	2.17	PM		0.50	10.43	2.17	PM		0.50	10.43	2.17		PM		0.04	0.19
2.67	PM10		0.61	10.43	2.67	PM10		0.61	10.43	2.67	PM10		0.61	10.43	2.67		PM10		0.04	0.16
2.67	PM2.5		0.61	10.43	2.67	PM2.5		0.61	10.43	2.67	PM2.5		0.61	10.43	2.67		PM2.5		0.04	0.16
	NOx					NOx					NOx						NOx			
	SOx					SOx					SOx						SOx			
	VOC					VOC					VOC						VOC		0.07	0.29
	CO					CO					CO						CO			
	Arsenic					Arsenic					Arsenic						Arsenic			
	Benzene					Benzene					Benzene						Benzene			
	Beryllium					Beryllium					Beryllium						Beryllium			
	Cadmium					Cadmium					Cadmium						Cadmium			
	Chromium					Chromium					Chromium						Chromium			
	Cobalt					Cobalt					Cobalt						Cobalt			
	Dichlorobenzene					Dichlorobenzene					Dichlorobenzene						Dichlorobenzene			
	Formaldehyde					Formaldehyde					Formaldehyde						Formaldehyde			
	Hexane					Hexane					Hexane						Hexane			
	Lead					Lead					Lead						Lead			
	Manganese					Manganese					Manganese						Manganese			
	Mercury					Mercury					Mercury						Mercury			
	Naphthalene					Naphthalene					Naphthalene						Naphthalene			
	Nickel					Nickel					Nickel						Nickel			
	POM					POM					POM						POM			
	Selenium					Selenium					Selenium						Selenium			
	Toluene					Toluene					Toluene						Toluene			
	CO2					CO2					CO2						CO2			
	CH4					CH4					CH4						CH4			
	N2O					N2O					N2O						N2O			
	CO2-e					CO2-e					CO2-e						CO2-e			
	Methanol					Methanol					Methanol						Methanol		0.07	0.29
	Total HAPs					Total HAPs					Total HAPs						Total HAPs		0.07	0.29

Emissions by Source Table

	3b) Tempo SI ID No.:		EQUI 54			**3b)** Tempo SI ID No.:		EQUI 55			**3b)** Tempo SI ID No.:		EQUI 56			**3b)** Tempo SI ID No.:		EQUI 57	
	3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:			
al	**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potentia	
tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted
0.19	PM		0.13	0.58	0.58	PM		0.13	0.58	0.58	PM		0.13	0.58	0.58	PM		0.13	0.58
0.16	PM10		0.11	0.49	0.49	PM10		0.11	0.49	0.49	PM10		0.11	0.49	0.49	PM10		0.11	0.49
0.16	PM2.5		0.11	0.49	0.49	PM2.5		0.11	0.49	0.49	PM2.5		0.11	0.49	0.49	PM2.5		0.11	0.49
	NOx					NOx					NOx					NOx			
	SOx					SOx					SOx					SOx			
	VOC		0.20	0.90		VOC		0.20	0.90		VOC		0.20	0.90		VOC		0.20	0.90
	CO					CO					CO					CO			
	Arsenic					Arsenic					Arsenic					Arsenic			
	Benzene					Benzene					Benzene					Benzene			
	Beryllium					Beryllium					Beryllium					Beryllium			
	Cadmium					Cadmium					Cadmium					Cadmium			
	Chromium					Chromium					Chromium					Chromium			
	Cobalt					Cobalt					Cobalt					Cobalt			
	Dichlorobenzene					Dichlorobenzene					Dichlorobenzene					Dichlorobenzene			
	Formaldehyde					Formaldehyde					Formaldehyde					Formaldehyde			
	Hexane					Hexane					Hexane					Hexane			
	Lead					Lead					Lead					Lead			
	Manganese					Manganese					Manganese					Manganese			
	Mercury					Mercury					Mercury					Mercury			
	Naphthalene					Naphthalene					Naphthalene					Naphthalene			
	Nickel					Nickel					Nickel					Nickel			
	POM					POM					POM					POM			
	Selenium					Selenium					Selenium					Selenium			
	Toluene					Toluene					Toluene					Toluene			
	CO2					CO2					CO2					CO2			
	CH4					CH4					CH4					CH4			
	N2O					N2O					N2O					N2O			
	CO2-e					CO2-e					CO2-e					CO2-e			
	Methanol		0.20	0.90		Methanol		0.20	0.90		Methanol		0.20	0.90		Methanol		0.20	0.90
	Total HAPs		0.20	0.90		Total HAPs		0.20	0.90		Total HAPs		0.20	0.90		Total HAPs		0.20	0.90

Emissions by Source Table

Emissions by Source Table

	3b) Tempo SI ID No.:		EQUI 58			**3b)** Tempo SI ID No.:		EQUI 59			**3b)** Tempo SI ID No.:		EQUI 60			**3b)** Tempo SI ID No.:		EQUI 61		
	3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:				
al	**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential		
tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited
0.58	PM		0.13	0.58	0.58	PM		0.13	0.58	0.58	PM		0.13	0.58	0.58	PM		0.13	0.58	0.58
0.49	PM10		0.11	0.49	0.49	PM10		0.11	0.49	0.49	PM10		0.11	0.49	0.49	PM10		0.11	0.49	0.49
0.49	PM2.5		0.11	0.49	0.49	PM2.5		0.11	0.49	0.49	PM2.5		0.11	0.49	0.49	PM2.5		0.11	0.49	0.49
	NOx					NOx					NOx					NOx				
	SOx					SOx					SOx					SOx				
	VOC		0.20	0.90		VOC		0.20	0.90		VOC		0.20	0.90		VOC		0.20	0.90	
	CO					CO					CO					CO				
	Arsenic					Arsenic					Arsenic					Arsenic				
	Benzene					Benzene					Benzene					Benzene				
	Beryllium					Beryllium					Beryllium					Beryllium				
	Cadmium					Cadmium					Cadmium					Cadmium				
	Chromium					Chromium					Chromium					Chromium				
	Cobalt					Cobalt					Cobalt					Cobalt				
	Dichlorobenzene					Dichlorobenzene					Dichlorobenzene					Dichlorobenzene				
	Formaldehyde					Formaldehyde					Formaldehyde					Formaldehyde				
	Hexane					Hexane					Hexane					Hexane				
	Lead					Lead					Lead					Lead				
	Manganese					Manganese					Manganese					Manganese				
	Mercury					Mercury					Mercury					Mercury				
	Naphthalene					Naphthalene					Naphthalene					Naphthalene				
	Nickel					Nickel					Nickel					Nickel				
	POM					POM					POM					POM				
	Selenium					Selenium					Selenium					Selenium				
	Toluene					Toluene					Toluene					Toluene				
	CO2					CO2					CO2					CO2				
	CH4					CH4					CH4					CH4				
	N2O					N2O					N2O					N2O				
	CO2-e					CO2-e					CO2-e					CO2-e				
	Methanol		0.20	0.90		Methanol		0.20	0.90		Methanol		0.20	0.90		Methanol		0.20	0.90	
	Total HAPs		0.20	0.90		Total HAPs		0.20	0.90		Total HAPs		0.20	0.90		Total HAPs		0.20	0.90	

Emissions by Source Table

3b) Tempo SI ID No.:		EQUI 62			**3b)** Tempo SI ID No.:		EQUI 63			**3b)** Tempo SI ID No.:		EQUI 64			**3b)** Tempo SI ID No.:		EQUI 65		
3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:				
3c)	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential		
Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited
PM		0.13	0.58	0.58	PM		0.07	0.29	0.29	PM		0.07	0.29	0.29	PM		0.07	0.29	0.29
PM10		0.11	0.49	0.49	PM10		0.06	0.25	0.25	PM10		0.06	0.25	0.25	PM10		0.06	0.25	0.25
PM2.5		0.11	0.49	0.49	PM2.5		0.06	0.25	0.25	PM2.5		0.06	0.25	0.25	PM2.5		0.06	0.25	0.25
NOx					NOx					NOx					NOx				
SOx					SOx					SOx					SOx				
VOC		0.20	0.90		VOC		0.10	0.45		VOC		0.10	0.45		VOC		0.10	0.45	
CO					CO					CO					CO				
Arsenic					Arsenic					Arsenic					Arsenic				
Benzene					Benzene					Benzene					Benzene				
Beryllium					Beryllium					Beryllium					Beryllium				
Cadmium					Cadmium					Cadmium					Cadmium				
Chromium					Chromium					Chromium					Chromium				
Cobalt					Cobalt					Cobalt					Cobalt				
Dichlorobenzene					Dichlorobenzene					Dichlorobenzene					Dichlorobenzene				
Formaldehyde					Formaldehyde					Formaldehyde					Formaldehyde				
Hexane					Hexane					Hexane					Hexane				
Lead					Lead					Lead					Lead				
Manganese					Manganese					Manganese					Manganese				
Mercury					Mercury					Mercury					Mercury				
Naphthalene					Naphthalene					Naphthalene					Naphthalene				
Nickel					Nickel					Nickel					Nickel				
POM					POM					POM					POM				
Selenium					Selenium					Selenium					Selenium				
Toluene					Toluene					Toluene					Toluene				
CO2					CO2					CO2					CO2				
CH4					CH4					CH4					CH4				
N2O					N2O					N2O					N2O				
CO2-e					CO2-e					CO2-e					CO2-e				
Methanol		0.20	0.90		Methanol					Methanol					Methanol				
Total HAPs		0.20	0.90		Total HAPs					Total HAPs					Total HAPs				

Emissions by Source Table

3b) Tempo SI ID No.:		EQUI 66			**3b)** Tempo SI ID No.:		EQUI 67			**3b)** Tempo SI ID No.:		EQUI 68				**3b)** Tempo SI ID No.:		EQUI 69		
3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:						**3b)** Delta ID No.:				
3c)	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3f)**	**3c)**	**3d)**	**3e)** Potential		
Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited		Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited
PM		0.07	0.29	0.29	PM		0.07	0.29	0.29	PM		0.03	0.14	0.14		PM		0.03	0.14	0.14
PM10		0.06	0.25	0.25	PM10		0.06	0.25	0.25	PM10		0.03	0.12	0.12		PM10		0.03	0.12	0.12
PM2.5		0.06	0.25	0.25	PM2.5		0.06	0.25	0.25	PM2.5		0.03	0.12	0.12		PM2.5		0.03	0.12	0.12
NOx					NOx					NOx						NOx				
SOx					SOx					SOx						SOx				
VOC		0.10	0.45		VOC		0.10	0.45		VOC		0.05	0.22			VOC		0.05	0.22	
CO					CO					CO						CO				
Arsenic					Arsenic					Arsenic						Arsenic				
Benzene					Benzene					Benzene						Benzene				
Beryllium					Beryllium					Beryllium						Beryllium				
Cadmium					Cadmium					Cadmium						Cadmium				
Chromium					Chromium					Chromium						Chromium				
Cobalt					Cobalt					Cobalt						Cobalt				
Dichlorobenzene					Dichlorobenzene					Dichlorobenzene						Dichlorobenzene				
Formaldehyde					Formaldehyde					Formaldehyde						Formaldehyde				
Hexane					Hexane					Hexane						Hexane				
Lead					Lead					Lead						Lead				
Manganese					Manganese					Manganese						Manganese				
Mercury					Mercury					Mercury						Mercury				
Naphthalene					Naphthalene					Naphthalene						Naphthalene				
Nickel					Nickel					Nickel						Nickel				
POM					POM					POM						POM				
Selenium					Selenium					Selenium						Selenium				
Toluene					Toluene					Toluene						Toluene				
CO2					CO2					CO2						CO2				
CH4					CH4					CH4						CH4				
N2O					N2O					N2O						N2O				
CO2-e					CO2-e					CO2-e						CO2-e				
Methanol					Methanol					Methanol						Methanol				
Total HAPs					Total HAPs					Total HAPs						Total HAPs				

Emissions by Source Table

Emissions by Source Table

3b) Tempo SI ID No.:		EQUI 70			**3b)** Tempo SI ID No.:		EQUI 71			**3b)** Tempo SI ID No.:		EQUI 72			**3b)** Tempo SI ID No.:		EQUI 73		
3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:				
3c)	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential		
Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited
PM		0.03	0.14	0.14	PM		0.03	0.14	0.14	PM		0.03	0.14	0.14	PM		0.01	0.05	0.05
PM10		0.03	0.12	0.12	PM10		0.03	0.12	0.12	PM10		0.03	0.12	0.12	PM10		0.01	0.04	0.04
PM2.5		0.03	0.12	0.12	PM2.5		0.03	0.12	0.12	PM2.5		0.03	0.12	0.12	PM2.5		0.01	0.04	0.04
NOx					NOx					NOx					NOx				
SOx					SOx					SOx					SOx				
VOC		0.05	0.22		VOC		0.05	0.22		VOC		0.05	0.22		VOC		0.02	0.08	
CO					CO					CO					CO				
Arsenic					Arsenic					Arsenic					Arsenic				
Benzene					Benzene					Benzene					Benzene				
Beryllium					Beryllium					Beryllium					Beryllium				
Cadmium					Cadmium					Cadmium					Cadmium				
Chromium					Chromium					Chromium					Chromium				
Cobalt					Cobalt					Cobalt					Cobalt				
Dichlorobenzene					Dichlorobenzene					Dichlorobenzene					Dichlorobenzene				
Formaldehyde					Formaldehyde					Formaldehyde					Formaldehyde				
Hexane					Hexane					Hexane					Hexane				
Lead					Lead					Lead					Lead				
Manganese					Manganese					Manganese					Manganese				
Mercury					Mercury					Mercury					Mercury				
Naphthalene					Naphthalene					Naphthalene					Naphthalene				
Nickel					Nickel					Nickel					Nickel				
POM					POM					POM					POM				
Selenium					Selenium					Selenium					Selenium				
Toluene					Toluene					Toluene					Toluene				
CO2					CO2					CO2					CO2				
CH4					CH4					CH4					CH4				
N2O					N2O					N2O					N2O				
CO2-e					CO2-e					CO2-e					CO2-e				
Methanol					Methanol					Methanol					Methanol				
Total HAPs					Total HAPs					Total HAPs					Total HAPs				

Emissions by Source Table

3b) Tempo SI ID No.:		EQUI 74			**3b)** Tempo SI ID No.:		EQUI 75			**3b)** Tempo SI ID No.:		EQUI 76			**3b)** Tempo SI ID No.:		EQUI 77		
3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:				
3c)	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential		
Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited
PM		0.10	0.46	0.46	PM		0.24	1.06	1.06	PM		0.05	0.20	0.20	PM		0.04	0.19	0.19
PM10		0.09	0.39	0.39	PM10		0.21	0.90	0.90	PM10		0.04	0.17	0.17	PM10		0.04	0.16	0.16
PM2.5		0.09	0.39	0.39	PM2.5		0.21	0.90	0.90	PM2.5		0.04	0.17	0.17	PM2.5		0.04	0.16	0.16
NOx					NOx					NOx					NOx				
SOx					SOx					SOx					SOx				
VOC		0.16	0.71		VOC		0.37	1.64		VOC		0.07	0.31		VOC		0.07	0.30	
CO					CO					CO					CO				
Arsenic					Arsenic					Arsenic					Arsenic				
Benzene					Benzene					Benzene					Benzene				
Beryllium					Beryllium					Beryllium					Beryllium				
Cadmium					Cadmium					Cadmium					Cadmium				
Chromium					Chromium					Chromium					Chromium				
Cobalt					Cobalt					Cobalt					Cobalt				
Dichlorobenzene					Dichlorobenzene					Dichlorobenzene					Dichlorobenzene				
Formaldehyde					Formaldehyde					Formaldehyde					Formaldehyde				
Hexane					Hexane					Hexane					Hexane				
Lead					Lead					Lead					Lead				
Manganese					Manganese					Manganese					Manganese				
Mercury					Mercury					Mercury					Mercury				
Naphthalene					Naphthalene					Naphthalene					Naphthalene				
Nickel					Nickel					Nickel					Nickel				
POM					POM					POM					POM				
Selenium					Selenium					Selenium					Selenium				
Toluene					Toluene					Toluene					Toluene				
CO2					CO2					CO2					CO2				
CH4					CH4					CH4					CH4				
N2O					N2O					N2O					N2O				
CO2-e					CO2-e					CO2-e					CO2-e				
Methanol					Methanol					Methanol					Methanol				
Total HAPs					Total HAPs					Total HAPs					Total HAPs				

Emissions by Source Table

3b) Tempo SI ID No.:		EQUI 78			**3b)** Tempo SI ID No.:		EQUI 79			**3b)** Tempo SI ID No.:		EQUI 80			**3b)** Tempo SI ID No.:		FUGI 1		
3b) Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:					**3b)** Delta ID No.:				
3c)	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential			**3c)**	**3d)**	**3e)** Potential		
Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited	Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited
PM		3.3E-03	0.01	0.01	PM		0.02	0.09	0.09	PM		0.01	0.05	0.05	PM				
PM10		2.8E-03	0.01	0.01	PM10		0.02	0.07	0.07	PM10		0.01	0.04	0.04	PM10				
PM2.5		2.8E-03	0.01	0.01	PM2.5		0.02	0.07	0.07	PM2.5		0.01	0.04	0.04	PM2.5				
NOx					NOx					NOx					NOx				
SOx					SOx					SOx					SOx				
VOC		0.01	0.02		VOC		0.03	0.13		VOC		0.02	0.08		VOC		0.43	1.87	1.87
CO					CO					CO					CO				
Arsenic					Arsenic					Arsenic					Arsenic				
Benzene					Benzene					Benzene					Benzene				
Beryllium					Beryllium					Beryllium					Beryllium				
Cadmium					Cadmium					Cadmium					Cadmium				
Chromium					Chromium					Chromium					Chromium				
Cobalt					Cobalt					Cobalt					Cobalt				
Dichlorobenzene					Dichlorobenzene					Dichlorobenzene					Dichlorobenzene				
Formaldehyde					Formaldehyde					Formaldehyde					Formaldehyde				
Hexane					Hexane					Hexane					Hexane				
Lead					Lead					Lead					Lead				
Manganese					Manganese					Manganese					Manganese				
Mercury					Mercury					Mercury					Mercury				
Naphthalene					Naphthalene					Naphthalene					Naphthalene				
Nickel					Nickel					Nickel					Nickel				
POM					POM					POM					POM				
Selenium					Selenium					Selenium					Selenium				
Toluene					Toluene					Toluene					Toluene				
CO2					CO2					CO2					CO2				
CH4					CH4					CH4					CH4				
N2O					N2O					N2O					N2O				
CO2-e					CO2-e					CO2-e					CO2-e				
Methanol					Methanol					Methanol					Methanol		0.43	1.87	1.87
Total HAPs					Total HAPs					Total HAPs					Total HAPs		0.43	1.87	1.87

Emissions by Source Table

3a) Tempo SI ID number:		COMG 2		
3b) Delta ID No.:				
3c)	**3d)**	**3e)** Potential		
Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited
PM				
PM10				
PM2.5				
NOx				
SOx				
VOC				90
CO				
Arsenic				
Benzene				
Beryllium				
Cadmium				
Chromium				
Cobalt				
Dichlorobenzene				
Formaldehyde				
Hexane				
Lead				
Manganese				
Mercury				
Naphthalene				
Nickel				
POM				
Selenium				
Toluene				
CO2				
CH4				
N2O				
CO2-e				
Methanol				90
Total HAPs				90

Emissions Summary Table

Total Facility			
4a)	**4b)**	**4c) Potential (tons/year)**	
Pollutant Name	**Potential (lbs/hr)**	**Unrestricted**	**Limited**
PM	**10.3**	**464.8**	**44.9**
PM10	**10.8**	**170.4**	**47.5**
PM2.5	**10.8**	**170.4**	**47.5**
NOx	**10.8**	**47.1**	**47.1**
SOx	**0.06**	**0.28**	**0.28**
VOC	**89.1**	**4233.9**	**91.9**
CO	**9.0**	**39.6**	**39.6**
Arsenic	**2.2E-05**	**9.4E-05**	**9.4E-05**
Benzene	**2.3E-04**	**9.89E-04**	**9.9E-04**
Beryllium	**1.3E-06**	**5.7E-06**	**5.7E-06**
Cadmium	**1.2E-04**	**5.2E-04**	**5.2E-04**
Chromium	**1.5E-04**	**6.6E-04**	**6.6E-04**
Cobalt	**9.0E-06**	**4.0E-05**	**4.0E-05**
Dichlorobenzene	**1.3E-04**	**5.7E-04**	**5.7E-04**
Formaldehyde	**0.01**	**0.03**	**0.03**
Hexane	**0.14**	**0.63**	**0.63**
Lead	**0.05**	**0.23**	**0.23**
Manganese	**4.4E-05**	**1.9E-04**	**1.9E-04**
Mercury	**3.1E-05**	**1.4E-04**	**1.4E-04**
Naphthalene	**5.5E-05**	**2.4E-04**	**2.4E-04**
Nickel	**1.8E-04**	**8.0E-04**	**8.0E-04**
POM	**1.2E-04**	**5.1E-04**	**5.1E-04**
Selenium	**2.2E-05**	**9.8E-05**	**9.8E-05**
Toluene	**2.7E-04**	**1.2E-03**	**1.2E-03**
CO2	**12,905**	**41,064**	**41,064**
CH4	**0.2**	**1.1**	**1.1**
N2O	**0.2**	**1.0**	**1.0**
CO2-e	**12,974**	**56,828**	**56,828**
Methanol	**19.14**	**3,207**	**91.9**
Total HAPs	**19**	**3,788**	**92.8**

Emissions Summary Table

3a) Tempo SI ID number:		Insignificant Activities		
3b) Delta ID No.:				
3c)	**3d)**	**3e)** Potential		
Pollutant Name	CAS #	Pounds (lbs) per hour	tons per year un-restricted	tons per year limited
PM		0.98	4.29	4.29
PM10		0.98	4.29	4.29
PM2.5		0.98	4.29	4.29
NOx		0.02	0.08	0.08
SOx		1.2E-04	5.1E-04	5.1E-04
VOC		0.01	0.03	0.03
CO		0.01	0.03	0.03

Total Facillity with Insignificant activities			
4a)	**4b)**	**4c)** Potential (tons/year)	
Pollutant Name	Potential (lbs/hr)	Unrestricted	Limited
PM	11	469	49.2
PM10	12	175	51.8
PM2.5	12	175	51.8
NOx	11	47	47.2
SOx	6.5E-02	2.8E-01	2.8E-01
VOC	89	4,234	91.9
CO	9	40	39.6

Bora Pharmaceuticals
Operation/Production Basis supporting emission calculations

Maximum Operating rates:

Maximum Daily:	24	hours/day	
Maximum Annual:	8,760	hours/year	

Maximum Equipment Capacity:

Boiler 2W	3.0	MMBtu/hr	Provided by Bora
Boiler 3W	3.0	MMBtu/hr	Provided by Bora
Boiler 1	2.1	MMBtu/hr	Provided by Bora
Boiler 2	2.1	MMBtu/hr	Provided by Bora
Boiler PP 1	3,266	SCFH	Provided by Bora
HPSB01	16.738	MMBtu/hr	Provided by Bora
HPSB02	16.738	MMBtu/hr	Provided by Bora
Boiler 3E	24,199	SCFH	Provided by Bora
HWB01	4	MMBtu/hr	Provided by Bora
HWB02	4	MMBtu/hr	Provided by Bora
TREA 1 - RTO 1	30.0	MMBtu/hr	Provided by Bora
TREA 1 - RTO 1	98%	control efficiency	Permit limit

Maximum Production Rates:

Plant C Production Methanol Solvent Usage - 1200kg FBPs	0.10	batch/hr	Minimum 10 hours per batch provided by Bora. Includes (setup (4 hrs), run (4 hrs), discharge (2 hrs), due to campaigning cleaning is limited to 1x / month) = 2.4 batches / day
	1,200	kg/batch	Maximum estimated based on batch record for potassium chloride M granules (KCM)
	2,646	lb/batch	conversion
	2	FBPs	Number of fluid bed processors of this type
	529	lb/hr	Calculated
	8,760	hours/year	Max potential for a batch/hr basis
	4,635,792	lb/year	Calculated
Plant C Production Methanol Solvent Usage - 600kg FBPs	0.10	batch/hr	Minimum 10 hours per batch provided by Bora. Includes (setup (4 hrs), run (4 hrs), discharge (2 hrs), due to campaigning cleaning is limited to 1x / month) = 2.4 batches / day
	750	kg/batch	Maximum estimated based on batch record for KCM
	1,654	lb/batch	conversion
	1	FBPs	Number of fluid bed processors of this type
	165	lb/hr	Calculated
	8,760	hours/year	Max potential for a batch/hr basis
	1,448,685	lb/year	Calculated
Plant C Production Methanol Solvent Usage - 150kg FBPs	0.10	batch/hr	Minimum 10 hours per batch provided by Bora.
	150	kg/batch	Maximum batch size
	331	lb/batch	conversion
	1	FBPs	Number of fluid bed processors of this type
	33	lb/hr	Calculated
	8,760	hours/year	Max potential for a batch/hr basis
	289,737	lb/year	Calculated
Plant C Production Non-HAP Solvent Usage - Tablet Coaters	0.08	batch/hr	Minimum 12 hours per batch provided by Bora. Includes (setup (2hrs), run (3 hrs), discharge (1 hr), clean (6 hrs)) = 2 batches / day
VOC-containing material	180	kg/batch	Provided by USL/CRB based on 5% weight gain, 10% soilds
	397	lb/batch	conversion
	1	TCs	Number of non-HAP solvent dedicated tablet coaters, the rest use aqueous coating solutions. The process does not use methanol in the tablet coaters.
	33	lb/hr	Calculated
	289,737	lb/year	Calculated
Total Facility Cleaning Solvent Usage	33	lb/day	Max estimated based on 2018 usage scaled up for new facility
	365	day/yr	
	12,045	lb/year	
Plant C Production Dry Material Dispensing Throughput	0.5	batch/hr	Minimum 2 hr/batch (setup, dispense, clean)
	900	kg/batch	Max estimate
	1,985	lb/batch	
	4	units	Number of weighing suites
	3,969	lb/hr	Calculated
	8,760	hours/year	
	17,384	ton/year	Calculated
Plant C Production Milling Material Throughput	3,969	lb/hr	Assumed maximum is the same as dispensing
EQUI 27-32, 49-52	8,760	hours/year	Max potential for a batch/hr basis
	17,384	ton/year	Calculated
Plant C Production Packaging - Tablet Counter Throughput	17,384	ton/yr	Assumed maximum is the same as dispensing
Plant C Production Encapsulation Throughput	17,384	ton/yr	Assumed maximum is the same as dispensing
Plant B Solvent Usage - FBP	0.08	batch/hr	Minimum 12 hour per batch (includes setup, run, clean)
VOC-containing material	250	kg/batch	Batch size estimate provided by Bora

Bora Pharmaceuticals

Operation/Production Basis supporting emission calculations

	551	lb/batch	
	1	FBP	Number of fluid bed processors
	46	lb/hr	Calculated
	8,760	hours/year	Max potential for a batch/hr basis
EQUI 33	402,413	lb/year	Calculated
Plant B Solvent Usage - Tablet Coater	0.08	batch/hr	Minimum 12 hour per batch (includes setup, run, clean)
VOC-containing materials	108.00	kg/batch	Batch size estimate provided by Bora
	238	lb/batch	
	1	TC	Number of tablet coaters
	20	lb/hr	Calculated
	8,760	hours/year	Max potential for a batch/hr basis
EQUI 34	173,842	lb/year	Calculated
Plant B Dry Material DispensingThroughput	1.0	batch/hr	Minimum 1 hour per batch (set up, dispensing,clean)
	198	lb/batch	Batch size is 1/10th of commercial
	198	lb/hr	Calculated
	8,760	hours/year	Max potential for a batch/hr basis
	1,738,422	lb/year	Calculated
Plant B Milling Material Throughput	198	lb/hr	Assumed maximum is the same as dispensing
	8,760	hours/year	Max potential for a batch/hr basis
	869	ton/year	Calculated
Encapsulation (Plant C)	17,384	ton/yr	Assumed maximum is the same as dispensing
Encapsulation (Plant B #2)	17,384	ton/yr	Assumed maximum is the same as dispensing
Packaging - Powder Line	17,384	ton/yr	Assumed maximum is the same as dispensing
Packaging - Canning Line	17,384	ton/yr	Assumed maximum is the same as dispensing
Weigh Booth/Dispensing	17,384	ton/yr	Assumed maximum is the same as dispensing

Note: Values are not permit limitations unless specified as such.

Unit Conversions

3.78541	L/gal
8.345	density of water in lb/gal
2.205	lb/kg
7.48	gal/ft3

Chemical Properties

Specific Gravities:	0.792	Methanol	Provided by Bora
	0.785	IPA as Solvent	Provided by Bora
	0.789	Ethanol	Provided by Bora
	0.786	IPA 70%	Provided by Bora

Bora Pharmaceuticals

Plant B - fluid bed processor and tablet coater

EQUI ID	TREA ID	Description	Potential Solvent Throughput (lb/yr)	% VOC/HAP Emitted	Potential Emission Rate		Operating Hours	Unrestricted Emissions		Permit allowable Emissions	
					VOC (lb/hr)	HAP (lb/hr)		VOC (tpy)	HAP (tpy)	VOC (tpy)	HAP (tpy)
EQUI 33	NA	Plant B FBP (solvent)	402,413	100%	45.94	0.00	8,760	201.2	0.0	COMG 2	0.0
EQUI 34	NA	Plant B Tablet Coater	173,842	100%	19.85	0.00	8,760	86.9	0.00	COMG 2	0.0

Particulates are included on the Dust Collectors tab.

No HAP is used at the Plant B units.

EQUI ID	TREA ID	Description	Air Flow Rate (dscfm)	Outlet Concentration (gr/dscf)	Uncontrolled Emission Rate (lb/hr)			Operating Hours	Uncontrolled Emissions (tpy)			Capture	Control Efficiency PM	Control Efficiency PM_{10}/PM 2.5	Potential Emission Rate			Potential Emissions		
					PM	PM_{10}	$PM_{2.5}$		PM	PM_{10}	$PM_{2.5}$				PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	PM (tpy)	PM_{10} (tpy)	$PM_{2.5}$ (tpy)
EQUI 33	TREA 18	Plant B FBP	1,765	0.002	3.03	0.43	0.43	8,760	13.3	1.9	1.9	100%	99.0%	93.0%	0.030	0.030	0.030	0.13	0.13	0.13
EQUI 34	TREA 19	Plant B TC	1,100	0.002	1.89	0.27	0.27	8,760	8.3	1.2	1.2	100%	99.0%	93.0%	0.019	0.019	0.019	0.08	0.08	0.08

Emisison units are in total enclosures. Assume PM2.5 capture efficiency is the same as PM10.

Minn. 7011.0735 Industrial Process Equipment Rule (IPER) compliance

Emission Unit	Stack	Flowrate (acfm)	Flowrate (dscfm)	IPER Allowable Grain Loading (gr/dscf)	IPER Allowable Emissions (lb/hr)	Permit allowable emissions (lb/hr)	IPER Compliant?
EQUI 33	STRU 36	1,765	1752	0.100	1.50	0.03	Yes
EQUI 34	STRU 37	1,100	1092	0.100	0.94	0.02	Yes

IPER compliant based on airflow.

Bora Pharmaceuticals
Boilers - Natural Gas Combustion 6.98E-04 lb/mmBtu

EQUI ID	STRU ID	Equipment Description	Maximum Capacity[1]	Max Capacity Units	Operating Hours (hr/yr)
EQUI 3	STRU5	Boiler 2W	3.0	MMBtu/hr	8,760
EQUI 4	STRU6	Boiler 3W	3.0	MMBtu/hr	8,760
EQUI 5	STRU7	Boiler 1	2.1	MMBtu/hr	8,760
EQUI 6	STRU8	Boiler 2	2.1	MMBtu/hr	8,760
EQUI 7	STRU9	Boiler Plant B	3,266	SCFH	8,760
EQUI 8	STRU10	HPSB01	16.738	MMBtu/hr	8,760
EQUI 9	STRU11	HPSB02	16.738	MMBtu/hr	8,760
EQUI 10	STRU12	Boiler 3E	24,199	SCFH	8,760
EQUI 11	STRU13	HWB01	4	MMBtu/hr	8,760
EQUI 12	STRU14	Boiler 5E	4	MMBtu/hr	8,760

			EQUI 3		EQUI 4		EQUI 5		EQUI 6		EQUI 7		EQUI 8		EQUI 9		EQUI 10		EQUI 11		EQUI 12	
Pollutant	Emission Factor[2] (lb/MMscf)	Emission Factor (lb/MMBtu)	Potential Emission Rate (lb/hr)	Potential Emissions (tpy)	Potential Emission Rate (lb/hr)	Potential Emissions (tpy)	Potential Emission Rate (lb/hr)	Potential Emissions (tpy)	Potential Emission Rate (lb/hr)	Potential Emissions (tpy)	Potential Emission Rate (lb/hr)	Potential Emissions (tpy)	Potential Emission Rate (lb/hr)	Potential Emissions (tpy)	Potential Emission Rate (lb/hr)	Potential Emissions (tpy)	Potential Emission Rate (lb/hr)	Potential Emissions (tpy)	Potential Emission Rate (lb/hr)	Potential Emissions (tpy)	Potential Emission Rate (lb/hr)	Potential Emissions (tpy)
PM	7.6	7.45E-03	0.02	0.10	0.02	0.10	0.02	0.07	0.02	0.07	0.02	0.11	0.12	0.55	0.12	0.55	0.18	0.81	0.03	0.13	0.03	0.13
PM_{10}	7.6	7.45E-03	0.02	0.10	0.02	0.10	0.02	0.07	0.02	0.07	0.02	0.11	0.12	0.55	0.12	0.55	0.18	0.81	0.03	0.13	0.03	0.13
$PM_{2.5}$	7.6	7.45E-03	0.02	0.10	0.02	0.10	0.02	0.07	0.02	0.07	0.02	0.11	0.12	0.55	0.12	0.55	0.18	0.81	0.03	0.13	0.03	0.13
NOx	100	9.80E-02	0.29	1.29	0.29	1.29	0.21	0.90	0.21	0.90	0.33	1.43	1.64	7.19	1.64	7.19	2.42	10.60	0.39	1.72	0.39	1.72
SO_2	6.0E-01	5.9E-04	1.8E-03	7.7E-03	1.8E-03	7.7E-03	1.2E-03	0.01	1.2E-03	0.01	0.00	0.01	0.01	0.04	0.01	0.04	0.01	0.06	2.4E-03	0.01	2.35E-03	1.03E-02
VOC	5.5	5.39E-03	0.02	0.07	0.02	0.07	0.01	0.05	0.01	0.05	0.02	0.08	0.09	0.40	0.09	0.40	0.13	0.58	0.02	0.09	0.02	0.09
CO	84	8.24E-02	0.25	1.08	0.25	1.08	0.17	0.76	0.17	0.76	0.27	1.20	1.38	6.04	1.38	6.04	2.03	8.90	0.33	1.44	0.33	1.44
Arsenic	2.00E-04	1.96E-07	5.9E-07	2.58E-06	5.9E-07	2.58E-06	4.1E-07	1.80E-06	4.1E-07	1.80E-06	6.5E-07	2.86E-06	3.3E-06	1.44E-05	3.3E-06	1.44E-05	4.8E-06	2.12E-05	7.8E-07	3.44E-06	7.8E-07	3.44E-06
Benzene	2.10E-03	2.06E-06	6.2E-06	2.71E-05	6.2E-06	2.71E-05	4.3E-06	1.89E-05	4.3E-06	1.89E-05	6.9E-06	3.00E-05	3.4E-05	1.51E-04	3.4E-05	1.51E-04	5.1E-05	2.23E-04	8.2E-06	3.61E-05	8.2E-06	3.61E-05
Beryllium	1.20E-05	1.18E-08	3.5E-08	1.55E-07	3.5E-08	1.55E-07	2.5E-08	1.08E-07	2.5E-08	1.08E-07	3.9E-08	1.72E-07	2.0E-07	8.62E-07	2.0E-07	8.62E-07	2.9E-07	1.27E-06	4.7E-08	2.06E-07	4.7E-08	2.06E-07
Cadmium	1.10E-03	1.08E-06	3.2E-06	1.42E-05	3.2E-06	1.42E-05	2.3E-06	9.92E-06	2.3E-06	9.92E-06	3.6E-06	1.57E-05	1.8E-05	7.91E-05	1.8E-05	7.91E-05	2.7E-05	1.17E-04	4.3E-06	1.89E-05	4.3E-06	1.89E-05
Chromium	1.40E-03	1.37E-06	4.1E-06	1.80E-05	4.1E-06	1.80E-05	2.9E-06	1.26E-05	2.9E-06	1.26E-05	4.6E-06	2.00E-05	2.3E-05	1.01E-04	2.3E-05	1.01E-04	3.4E-05	1.48E-04	5.5E-06	2.40E-05	5.5E-06	2.40E-05
Cobalt	8.40E-05	8.24E-08	2.5E-07	1.08E-06	2.5E-07	1.08E-06	1.7E-07	7.57E-07	1.7E-07	7.57E-07	2.7E-07	1.20E-06	1.4E-06	6.04E-06	1.4E-06	6.04E-06	2.0E-06	8.90E-06	3.3E-07	1.44E-06	3.3E-07	1.44E-06
Dichlorobenzene	1.20E-03	1.18E-06	3.5E-06	1.55E-05	3.5E-06	1.55E-05	2.5E-06	1.08E-05	2.5E-06	1.08E-05	3.9E-06	1.72E-05	2.0E-05	8.62E-05	2.0E-05	8.62E-05	2.9E-05	1.27E-04	4.7E-06	2.06E-05	4.7E-06	2.06E-05
Formaldehyde	7.50E-02	7.35E-05	2.2E-04	9.66E-04	2.2E-04	9.66E-04	1.5E-04	6.76E-04	1.5E-04	6.76E-04	2.4E-04	1.07E-03	1.2E-03	5.39E-03	1.2E-03	5.39E-03	1.8E-03	7.95E-03	2.9E-04	1.29E-03	2.9E-04	1.29E-03
Hexane	1.80E+00	1.76E-03	5.3E-03	2.32E-02	5.3E-03	2.32E-02	3.7E-03	1.62E-02	3.7E-03	1.62E-02	5.9E-03	2.57E-02	3.0E-02	1.29E-01	3.0E-02	1.29E-01	4.4E-02	1.91E-01	7.1E-03	3.09E-02	7.1E-03	3.09E-02
Lead	5.00E-04	4.90E-07	1.5E-06	6.44E-06	1.5E-06	6.44E-06	1.0E-06	4.51E-06	1.0E-06	4.51E-06	1.6E-06	7.15E-06	8.2E-06	3.59E-05	8.2E-06	3.59E-05	1.2E-05	5.30E-05	2.0E-06	8.59E-06	2.0E-06	8.59E-06
Manganese	3.80E-04	3.73E-07	1.1E-06	4.90E-06	1.1E-06	4.90E-06	7.8E-07	3.43E-06	7.8E-07	3.43E-06	1.2E-06	5.44E-06	6.2E-06	2.73E-05	6.2E-06	2.73E-05	9.2E-06	4.03E-05	1.5E-06	6.53E-06	1.5E-06	6.53E-06
Mercury	2.60E-04	2.55E-07	7.6E-07	3.35E-06	7.6E-07	3.35E-06	5.4E-07	2.34E-06	5.4E-07	2.34E-06	8.5E-07	3.72E-06	4.3E-06	1.87E-05	4.3E-06	1.87E-05	6.3E-06	2.76E-05	1.0E-06	4.47E-06	1.0E-06	4.47E-06
Naphthalene	6.10E-04	5.98E-07	1.8E-06	7.86E-06	1.8E-06	7.86E-06	1.3E-06	5.50E-06	1.3E-06	5.50E-06	2.0E-06	8.73E-06	1.0E-05	4.38E-05	1.0E-05	4.38E-05	1.5E-05	6.47E-05	2.4E-06	1.05E-05	2.4E-06	1.05E-05
Nickel	2.10E-03	2.06E-06	6.2E-06	2.71E-05	6.2E-06	2.71E-05	4.3E-06	1.89E-05	4.3E-06	1.89E-05	6.9E-06	3.00E-05	3.4E-05	1.51E-04	3.4E-05	1.51E-04	5.1E-05	2.23E-04	8.2E-06	3.61E-05	8.2E-06	3.61E-05
POM	6.98E-04	6.85E-07	2.1E-06	8.99E-06	2.1E-06	8.99E-06	1.4E-06	6.30E-06	1.4E-06	6.30E-06	2.3E-06	9.99E-06	1.1E-05	5.02E-05	1.1E-05	5.02E-05	1.7E-05	7.40E-05	2.7E-06	1.20E-05	2.7E-06	1.20E-05
Selenium	2.40E-05	2.35E-08	7.1E-08	3.09E-07	7.1E-08	3.09E-07	4.9E-08	2.16E-07	4.9E-08	2.16E-07	7.8E-08	3.43E-07	3.9E-07	1.72E-06	3.9E-07	1.72E-06	5.8E-07	2.54E-06	9.4E-08	4.12E-07	9.4E-08	4.12E-07
Toluene	3.40E-03	3.33E-06	1.0E-05	4.38E-05	1.0E-05	4.38E-05	7.0E-06	3.07E-05	7.0E-06	3.07E-05	1.1E-05	4.86E-05	5.6E-05	2.44E-04	5.6E-05	2.44E-04	8.2E-05	3.60E-04	1.3E-05	5.84E-05	1.3E-05	5.84E-05
Total HAPs			5.6E-03	0.02	5.6E-03	0.02	3.9E-03	0.02	3.9E-03	0.02	6.2E-03	0.03	3.1E-02	0.14	3.1E-02	0.14	4.6E-02	0.20	7.4E-03	0.03	7.4E-03	3.24E-02
Carbon Dioxide	120,000	117.65	352.9	1,546	352.9	1,546	247.1	1,082	247.1	1,082	391.9	1,717	1,969	8,625	1,969	8,625	2,904	12,719	471	2,061	471	2,061
Methane	2.3	2.25E-03	0.01	0.03	0.01	0.03	0.00	0.02	0.00	0.02	0.01	0.03	0.04	0.17	0.04	0.17	0.06	0.24	0.01	0.04	0.01	0.04
Nitrous Oxide	2.2	2.16E-03	0.01	0.03	0.01	0.03	0.00	0.02	0.00	0.02	0.01	0.03	0.04	0.16	0.04	0.16	0.05	0.23	0.01	0.04	0.01	0.04
CO_2-e[3]			355	1,554	355	1,554	248	1,088	248	1,088	394	1,726	1,980	8,672	1,980	8,672	2,920	12,788	473	2,072	473	2,072

1 - Based on manufacturer specifications, for units
2 - Emission factors for natural gas combustion are from AP-42, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4.
3 - Global Warming Potentials are from Appendix A of 40 CFR Part 98.
4 - POM emission factor is the sum of individual polyorganic cyclic matter chemicals in AP-42, Table 1.3.

Bora Pharmaceuticals

Regenerative Thermal Oxidizer (TREA 1)

Combustion Emissions from the RTO

Total Heat Input Capacity[1]: 30 mmBtu/hr 6.98E-04 lb/mmBtu

Pollutant	Emission Factor[2] (lb/mmscf)	Emission Factor (lb/mmBtu)	Operating Hours	Potential Emission Rate (lb/hr)	Potential Emissions (tpy)
PM	7.6	7.45E-03	8,760	0.22	0.98
PM_{10}	7.6	7.45E-03	8,760	0.22	0.98
$PM_{2.5}$	7.6	7.45E-03	8,760	0.22	0.98
NOx	100	9.80E-02	8,760	2.94	12.88
SO_2	0.6	5.88E-04	8,760	0.02	0.08
VOC	5.5	5.39E-03	8,760	0.16	0.71
CO	84	8.24E-02	8,760	2.47	10.82
Arsenic	2.00E-04	1.96E-07	8,760	5.88E-06	2.58E-05
Benzene	2.10E-03	2.06E-06	8,760	6.18E-05	2.71E-04
Beryllium	1.20E-05	1.18E-08	8,760	3.53E-07	1.55E-06
Cadmium	1.10E-03	1.08E-06	8,760	3.24E-05	1.42E-04
Chromium	1.40E-03	1.37E-06	8,760	4.12E-05	1.80E-04
Cobalt	8.40E-05	8.24E-08	8,760	2.47E-06	1.08E-05
Dichlorobenzene	1.20E-03	1.18E-06	8,760	3.53E-05	1.55E-04
Formaldehyde	7.50E-02	7.35E-05	8,760	2.21E-03	9.66E-03
Hexane	1.80E+00	1.76E-03	8,760	5.29E-02	2.32E-01
Lead	5.00E-04	4.90E-07	8,760	1.47E-05	6.44E-05
Manganese	3.80E-04	3.73E-07	8,760	1.12E-05	4.90E-05
Mercury	2.60E-04	2.55E-07	8,760	7.65E-06	3.35E-05
Naphthalene	6.10E-04	5.98E-07	8,760	1.79E-05	7.86E-05
Nickel	2.10E-03	2.06E-06	8,760	6.18E-05	2.71E-04
POM	6.98E-04	6.85E-07	8,760	2.05E-05	8.99E-05
Selenium	2.40E-05	2.35E-08	8,760	7.06E-07	3.09E-06
Toluene	3.40E-03	3.33E-06	8,760	1.00E-04	4.38E-04
Total HAPs				**0.06**	**0.24**
Carbon Dioxide	120,000	117.65	8,760	3,529	15,459
Methane	2.3	2.25E-03	8,760	6.76E-02	2.96E-01
Nitrous Oxide	2.2	2.16E-03	8,760	6.47E-02	2.83E-01
CO_2-e[3]				**3,548**	**15,542**

1 - Based on manufacturer specifications

2 - Emission factors for natural gas combustion are from Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4 of AP-42.

3 - Global Warming Potentials are from Appendix A of 40 CFR Part 98.

4 - POM emission factor is sum of individual polyorganic cyclic matter chemicals in AP-42, Table 1.3.

Fluid Bed Processors and Tablet coaters

VOC and HAP emissions Plant C

	Methanol (lb/yr)	Non-HAP Solvent (lb/yr)	Notes
Annual Throughput to FBPs:	6,374,214	0	Assuming worst-case, which is all solvent used is methanol
Annual Throughput to TCs:	--	289,737	Methanol is not used at the tablet coaters. Only EQUI 22 (TC1) is rated for solvent use and routed to the RTO, the other TCs (EQUIs 23, 24, 25, 26) are aqueous

Unit	Pollutant	Max Potential Solvent Throughput (lb/year)	TREA 1 Control Efficiency	Operating Hours	Uncontrolled Emission Rate (lb/hr)	Controlled Emission Rate (lb/hr)	Uncontrolled Emissions (tpy)	Controlled Emissions (tpy)
EQUI 15 - FBP 2	VOC	1,448,685	98%	8,760	165	3.31	724	14.49
	Methanol	1,448,685	98%	8,760	165	3.31	724	14.49
EQUI 16 - FBP 1	VOC	2,317,896	98%	8,760	265	5.29	1,159	23.18
	Methanol	2,317,896	98%	8,760	265	5.29	1,159	23.18
EQUI 17 - FBP 4	VOC	2,317,896	98%	8,760	265	5.29	1,159	23.18
	Methanol	2,317,896	98%	8,760	265	5.29	1,159	23.18
EQUI 19 - FBP 5	VOC	289,737	98%	8,760	33	0.66	145	2.90
	Methanol	289,737	98%	8,760	33	0.66	145	2.90
EQUI 22 - TC1	VOC	289,737	98%	8,760	165	0.66	724	2.90

[1] Includes RTO control on FBPs and TCs. Also TCs limited to only 1 of the 5 using solvent and the rest use aqueous solution.

These units are subject to the 90 tpy VOC cap at COMG 2 in the permit. Methanol and other HAPs are effectively restricted by the cap to 90 tpy.

Particulate emissions

EQUI ID	TREA ID	Description	Air Flow Rate (dscfm)[2]	Outlet Concentration (gr/dscf)[2]	Uncontrolled Emission Rate (lb/hr)			Operating Hours	Uncontrolled Emissions (tpy)			Capture	Control Efficiency PM[1]	Control Efficiency PM10/ PM2.5	Potential Emission Rate			Potential Emissions		
					PM	PM_{10}	$PM_{2.5}$		PM	PM_{10}	$PM_{2.5}$				PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$ (lb/hr)	PM (tpy)	PM_{10} (tpy)	$PM_{2.5}$ (tpy)
EQUI 15 - FBP 2	TREA 2	FBP02-DC-001	4,500	0.002	7.71	1.10	1.10	8,760	33.8	4.8	4.8	100%	99.0%	93.0%	0.077	0.077	0.077	0.338	0.338	0.338
EQUI 16 - FBP 1	TREA 3	FBP01-DC-001	6,000	0.002	10.29	1.47	1.47	8,760	45.1	6.4	6.4	100%	99.0%	93.0%	0.103	0.103	0.103	0.451	0.451	0.451
EQUI 17 - FBP 4	TREA 4	FBP04-DC-001	6000	0.002	10.29	1.47	1.47	8,760	45.1	6.4	6.4	100%	99.0%	93.0%	0.103	0.103	0.103	0.451	0.451	0.451
EQUI 19 - FBP 5	TREA 6	FBP05-DC-001	3,000	0.002	5.14	0.73	0.73	8,760	22.5	3.2	3.2	100%	99.0%	93.0%	0.051	0.051	0.051	0.225	0.225	0.225
EQUI 18 - FBP 3	TREA 5	FBP05-DC-001	3,000	0.002	5.14	0.73	0.73	8,760	22.5	3.2	3.2	100%	99.0%	93.0%	0.051	0.051	0.051	0.23	0.23	0.23
EQUI 22 Tablet coater 1	TREA 9	TC01-DC-001	4,000	0.002	6.86	0.98	0.98	8,760	30.0	4.3	4.3	100%	99.0%	93.0%	0.069	0.069	0.069	0.30	0.30	0.30
EQUI 23 Tablet coater 2	TREA 10	TC02-DC-001	4,000	0.002	6.86	0.98	0.98	8,760	30.0	4.3	4.3	100%	99.0%	93.0%	0.069	0.069	0.069	0.30	0.30	0.30
EQUI 24 Tablet coater 3	TREA 11	TC03-DC-001	4,000	0.002	6.86	0.98	0.98	8,760	30.0	4.3	4.3	100%	99.0%	93.0%	0.069	0.069	0.069	0.30	0.30	0.30
EQUI 25 Tablet coater 4	TREA 12	TC04-DC-001	4,000	0.002	6.86	0.98	0.98	8,760	30.0	4.3	4.3	100%	99.0%	93.0%	0.069	0.069	0.069	0.30	0.30	0.30
EQUI 26 Tablet coater 5	TREA 13	TC05-DC-001	4,000	0.002	6.86	0.98	0.98	8,760	30.0	4.3	4.3	100%	99.0%	93.0%	0.069	0.069	0.069	0.30	0.30	0.30

7000 grains/pound

60 min/hr

1 - Emission units are in total enclosures. Assume PM2.5 capture efficiency is the same as PM10.

Minn. R. 7011.0735 Industrial Process Equipment Rule (IPER) compliance

Emission Unit	Stack	Flowrate (acfm)	Flowrate (dscfm)	IPER Allowable Grain Loading[A] (gr/dscf)	IPER Allowable Emissions (lb/hr)	Permitted PTE[B] (lb/hr)	IPER Compliant?
EQUI 15	STRU 17	4,500	3895	0.100	3.34	0.077	Yes
EQUI 16	STRU 18	6,000	5193	0.100	4.45	0.103	Yes
EQUI 17	STRU 19	6,000	5193	0.100	4.45	0.103	Yes
EQUI 19	STRU 21	6,000	5193	0.100	4.45	0.051	Yes
EQUI 18	STRU 20	3,000	2597	0.100	2.23	0.051	Yes
EQUI 22	STRU 24	4,000	3462	0.100	2.97	0.069	Yes
EQUI 23	STRU 25	4,000	3462	0.100	2.97	0.069	Yes
EQUI 24	STRU 26	4,000	3580	0.100	3.07	0.069	Yes
EQUI 25	STRU 27	4,000	3641	0.100	3.12	0.069	Yes
EQUI 26	STRU 28	4,000	3462	0.100	2.97	0.069	Yes

Bora Pharmaceuticals

Milling equipment
All mills (EQUI 27-32 and 49-52) have the same emissions

EQUI ID	Control	Description	Dry Material Throughput (ton/hr)	Operating Hours	Emission Factor[1] (lb/ton)	Uncontrolled Emissions PM (lb/hr)	Uncontrolled Emissions PM_{10} (lb/hr)	Uncontrolled Emissions $PM_{2.5}$[5] (lb/hr)	Uncontrolled Emissions PM (tpy)	Uncontrolled Emissions PM_{10} (tpy)	Uncontrolled Emissions $PM_{2.5}$ (tpy)	PM Control Efficiency[3]	PM10/ PM2.5 Control Efficiency[3]	Controlled Emissions PM (lb/hr)	Controlled Emissions PM_{10} (lb/hr)	Controlled Emissions $PM_{2.5}$ (lb/hr)	Permit allowable emissions PM (tpy)	Permit allowable emissions PM_{10} (tpy)	Permit allowable emissions $PM_{2.5}$ (tpy)
EQUI 27 - 32, EQUI 49-52	TREA 14, 15, 16, 17	Mills 1-10	1.98	8,760	1.20	2.4	2.4	2.4	10.4	10.4	10.4	79%	74%	0.50	0.61	0.61	2.17	2.67	2.67

1 - This uncontrolled emission factor for Milling is based on the AP-42, Table 9.9.1-2, for Animal Feed Mills, Grain Milling, Hammermill as controlled by baghouse assuming 99% control efficiency.
3 - Emissions from milling equipment are captured via snorkel and routed to dust collectors that act as hoods. PM2.5 capture is assumed to be similar to PM10 capture.
4 - Estimated emissions are conservative because they will be further controlled by HEPA filters in the exhaust stacks, which are not accounted for in these calculations or by the permit.
5 - $PM_{2.5}$ emissions are assumed to be the same as PM_{10} emissions.

Minn. R. 7011.0735 Industrial Process Equipment Rule (IPER) compliance

Emission Unit	Stack	Flowrate (acfm)	Flowrate (dscfm)	IPER Allowable Grain Loading (gr/dscf)	IPER limit (lb/hr)	PTE[B] (lb/hr)	Meets IPER ?
EQUI 27	varies	14,000	12118	0.084	8.69	0.4953	Yes
EQUI 28	varies	14,000	13947	0.080	9.56	0.4953	Yes
EQUI 29	varies	14,000	13947	0.080	9.56	0.4953	Yes
EQUI 30	varies	14,000	13947	0.080	9.56	0.4953	Yes
EQUI 31	varies	14,000	13817	0.080	9.50	0.4953	Yes
EQUI 32	varies	14,000	13895	0.080	9.54	0.4953	Yes
EQUI 49	varies	14,000	13895	0.080	9.54	0.4953	Yes
EQUI 50	varies	14,000	13895	0.080	9.54	0.4953	Yes
EQUI 51	varies	14,000	13895	0.080	9.54	0.4953	Yes
EQUI 52	varies	14,000	13895	0.080	9.54	0.4953	Yes

Bora Pharmaceuticals

Equipment Cleaning EQUI 48

Annual IPA 70% Usage for Cleaning:	12,045	lb/year
Percent VOC:	79%	IPA Concentration per SDS
VOC Emissions	9,467	lb/year
	4.73	tpy
	1.375	lb/hr

1 - Assuming all IPA used for cleaning is emitted to atmosphere. IPA is not a HAP.

Bora Pharmaceuticals
Process Tanks, and High Shear Granulation

			Method A	Method B																		
			Total Plant Potential Annual Solvent Throughput (lb/yr) [4a]	Volume (gal) [3]	Minimum Batch Time (hr)[3]	Max Batches per Year	Equipment Potential Annual Solvent Throughput [4b]		Max Annual Throughput (lb/yr) [4]	PM Emission Factor[1] (lb/ton)	PM_{10} Emission Factor[1] (lb/ton)	$PM_{2.5}$ Emission Factor[1] (lb/ton)	VOC Emission Factor[2] (lb/ton)	Potential Emission Rate (lb/hr)					Potential Emissions (tpy)				
EQUI ID	Tank Description	Material					(gal/yr)	(lb/yr)						PM [1]	PM_{10} [1]	$PM_{2.5}$ [1]	VOC[2]	HAP[2]	PM	PM_{10}	$PM_{2.5}$	VOC	HAP
EQUI 43	Tank TM01-TK-001	Methanol Solvent	6,374,214	450	10.0	876	394,200	2,603,718	2,603,718	2.0	1.7	1.7	3.1	0.30	0.25	0.25	0.46	0.46	1.30	1.11	1.11	2.02	2.02
EQUI 44	Tank TM01-TK-002	Methanol Solvent	6,374,214	450	10.0	876	394,200	2,603,718	2,603,718	2.0	1.7	1.7	3.1	0.30	0.25	0.25	0.46	0.46	1.30	1.11	1.11	2.02	2.02
EQUI 45	Plant C Solution Prep Tank 1	Methanol Solvent	6,374,214	650	10.0	876	569,400	3,760,925	3,760,925	2.0	1.7	1.7	3.1	0.43	0.36	0.36	0.67	0.67	1.88	1.60	1.60	2.91	2.91
EQUI 46	Plant C Solution Prep Tank 2	Methanol Solvent	6,374,214	650	10.0	876	569,400	3,760,925	3,760,925	2.0	1.7	1.7	3.1	0.43	0.36	0.36	0.67	0.67	1.88	1.60	1.60	2.91	2.91
EQUI 53	Plant C Solution Prep Tank 3	Methanol Solvent	6,374,214	65	10.0	876	56,940	376,093	376,093	2.0	1.7	1.7	3.1	0.04	0.04	0.04	0.07	0.07	0.19	0.16	0.16	0.29	0.29
EQUI 54	Plant C Solution Prep Tank 4	Methanol Solvent	6,374,214	200	10.0	876	175,200	1,157,208	1,157,208	2.0	1.7	1.7	3.1	0.13	0.11	0.11	0.20	0.20	0.58	0.49	0.49	0.90	0.90
EQUI 55	Plant C Solution Prep Tank 5	Methanol Solvent	6,374,214	200	10.0	876	175,200	1,157,208	1,157,208	2.0	1.7	1.7	3.1	0.13	0.11	0.11	0.20	0.20	0.58	0.49	0.49	0.90	0.90
EQUI 56	Plant C Solution Prep Tank 6	Methanol Solvent	6,374,214	200	10.0	876	175,200	1,157,208	1,157,208	2.0	1.7	1.7	3.1	0.13	0.11	0.11	0.20	0.20	0.58	0.49	0.49	0.90	0.90
EQUI 57	Plant C Solution Prep Tank 7	Methanol Solvent	6,374,214	200	10.0	876	175,200	1,157,208	1,157,208	2.0	1.7	1.7	3.1	0.13	0.11	0.11	0.20	0.20	0.58	0.49	0.49	0.90	0.90
EQUI 58	Plant C Solution Prep Tank 8	Methanol Solvent	6,374,214	200	10.0	876	175,200	1,157,208	1,157,208	2.0	1.7	1.7	3.1	0.13	0.11	0.11	0.20	0.20	0.58	0.49	0.49	0.90	0.90
EQUI 59	Plant C Solution Prep Tank 9	Methanol Solvent	6,374,214	200	10.0	876	175,200	1,157,208	1,157,208	2.0	1.7	1.7	3.1	0.13	0.11	0.11	0.20	0.20	0.58	0.49	0.49	0.90	0.90
EQUI 60	Plant C Solution Prep Tank 10	Methanol Solvent	6,374,214	200	10.0	876	175,200	1,157,208	1,157,208	2.0	1.7	1.7	3.1	0.13	0.11	0.11	0.20	0.20	0.58	0.49	0.49	0.90	0.90
EQUI 61	Plant C Solution Prep Tank 11	Methanol Solvent	6,374,214	200	10.0	876	175,200	1,157,208	1,157,208	2.0	1.7	1.7	3.1	0.13	0.11	0.11	0.20	0.20	0.58	0.49	0.49	0.90	0.90
EQUI 62	Plant C Solution Prep Tank 12	Methanol Solvent	6,374,214	200	10.0	876	175,200	1,157,208	1,157,208	2.0	1.7	1.7	3.1	0.13	0.11	0.11	0.20	0.20	0.58	0.49	0.49	0.90	0.90
EQUI 63	Plant C Solution Prep Tank 13	non-HAP Solvent	6,374,214	100	10.0	876	87,600	576,776	576,776	2.0	1.7	1.7	3.1	0.07	0.06	0.06	0.10	--	0.29	0.25	0.25	0.45	--
EQUI 64	Plant C Solution Prep Tank 14	non-HAP Solvent	6,374,214	100	10.0	876	87,600	576,776	576,776	2.0	1.7	1.7	3.1	0.07	0.06	0.06	0.10	--	0.29	0.25	0.25	0.45	--
EQUI 65	Plant C Solution Prep Tank 15	non-HAP Solvent	6,374,214	100	10.0	876	87,600	576,776	576,776	2.0	1.7	1.7	3.1	0.07	0.06	0.06	0.10	--	0.29	0.25	0.25	0.45	--
EQUI 66	Plant C Solution Prep Tank 16	non-HAP Solvent	6,374,214	100	10.0	876	87,600	576,776	576,776	2.0	1.7	1.7	3.1	0.07	0.06	0.06	0.10	--	0.29	0.25	0.25	0.45	--
EQUI 67	Plant C Solution Prep Tank 17	non-HAP Solvent	6,374,214	100	10.0	876	87,600	576,776	576,776	2.0	1.7	1.7	3.1	0.07	0.06	0.06	0.10	--	0.29	0.25	0.25	0.45	--
EQUI 68	Solution Holding Tank (TC) #1	non-HAP Solvent	289,737	65	10.0	876	56,940	374,905	289,737	2.0	1.7	1.7	3.1	0.03	0.03	0.03	0.05	--	0.14	0.12	0.12	0.22	--
EQUI 69	Plant C Solution Prep Tank 18	non-HAP Solvent	289,737	100	10.0	876	87,600	576,776	289,737	2.0	1.7	1.7	3.1	0.03	0.03	0.03	0.05	--	0.14	0.12	0.12	0.22	--
EQUI 70	Plant C Solution Prep Tank 19	non-HAP Solvent	289,737	100	10.0	876	87,600	576,776	289,737	2.0	1.7	1.7	3.1	0.03	0.03	0.03	0.05	--	0.14	0.12	0.12	0.22	--
EQUI 71	Plant C Solution Prep Tank 20	non-HAP Solvent	289,737	100	10.0	876	87,600	576,776	289,737	2.0	1.7	1.7	3.1	0.03	0.03	0.03	0.05	--	0.14	0.12	0.12	0.22	--
EQUI 72	Plant C Solution Prep Tank 21	non-HAP Solvent	289,737	100	10.0	876	87,600	576,776	289,737	2.0	1.7	1.7	3.1	0.03	0.03	0.03	0.05	--	0.14	0.12	0.12	0.22	--
EQUI 73	HSG 1 (solvent)	non-HAP Solvent	6,374,214	18	10.0	876	15,768	103,820	103,820	2.0	1.7	1.7	3.1	0.01	0.01	0.01	0.02	--	0.05	0.04	0.04	0.08	--
EQUI 74	HSG 2 (solvent)	non-HAP Solvent	6,374,214	159	10.0	876	139,284	917,074	917,074	2.0	1.7	1.7	3.1	0.10	0.09	0.09	0.16	--	0.46	0.39	0.39	0.71	--
EQUI 75	HSG 3 (solvent)	non-HAP Solvent	6,374,214	367	10.0	876	321,492	2,116,769	2,116,769	2.0	1.7	1.7	3.1	0.24	0.21	0.21	0.37	--	1.06	0.90	0.90	1.64	--
EQUI 47	Plant B Solution Prep Tank 1	non-HAP Solvent	402,413	70	10.0	876	61,320	405,023	402,413	2.0	1.7	1.7	3.1	0.05	0.04	0.04	0.07	--	0.20	0.17	0.17	0.31	--
EQUI 76	Plant B Solution Prep Tank 4	non-HAP Solvent	402,413	70	10.0	876	61,320	405,023	402,413	2.0	1.7	1.7	3.1	0.05	0.04	0.04	0.07	--	0.20	0.17	0.17	0.31	--
EQUI 77	Plant B Solution Prep Tank 2	non-HAP Solvent	402,413	66	10.0	876	57,816	381,879	381,879	2.0	1.7	1.7	3.1	0.04	0.04	0.04	0.07	--	0.19	0.16	0.16	0.30	--
EQUI 78	Plant B Solution Prep Tank 5	non-HAP Solvent	402,413	5	10.0	876	4,380	28,839	28,839	2.0	1.7	1.7	3.1	3.29E-03	2.80E-03	2.80E-03	0.01	--	0.01	0.01	0.01	0.02	--
EQUI 79	Plant B Solution Prep Tank 3	non-HAP Solvent	173,842	66	10.0	876	57,816	380,672	173,842	2.0	1.7	1.7	3.1	1.98E-02	1.69E-02	1.69E-02	0.03	--	0.09	0.07	0.07	0.13	--
EQUI 80	HSG 4 (solvent)	non-HAP Solvent	6,374,214	18	10.0	876	15,768	103,820	103,820	2.0	1.7	1.7	3.1	0.01	0.01	0.01	0.02	--	0.05	0.04	0.04	0.08	--

1 - Emissions determined using EPA WebFIRE emission factors for pigment mixing of printing ink

2 - Emissions determined using EPA WebFIRE emission factors for Pharmaceutical Preparations – Other Not Classified: 1.55E-3 kg dichloromethane per kg of coating mix processed. The process uses methanol, not dichloromethane, but a methanol emission factor for pharmaceutical preparations is not available. It is assumed to be a conservative surrogate since methanol is less volatile than dichloromethane. VOC EF = 0.00155 kg/kgmix / 0.4536 kg/lb * 907.2 kg/ton

3 - Equipment specifications provided by Bora.

4 - The following two methods are used to calculate potential throughput. The resulting lb/yr values are compared on a unit-by-unit basis, and the lesser of the two calculated values is the maximum annual throughput.

a. Total Plant Potential Annual Solvent Throughput assumes that 100% of the annual potential throughput through Plant B or C passes through the single tank being evaluated.

b. The tank volume and the minimum batch time restrict the potential solvent throughput. For example, if a batch takes at least 10 hours, then the maximum number of batches is 876 per year. Assuming a 200 gal tank is filled to capacity for each batch, then the maximum throughput is 876*200 = 175,200 gal.

Minn. R. 7011.0735 Industrial Process Equipment Rule (IPER) compliance

Emission Unit	Process Rate (lb/hr)	Emission Limit* (lb/hr)	Permitted PTE (lb/hr)	IPER Compliant ?	PTE as percent of limit
EQUI 43	297.23	1.10	0.30	Yes	27%
EQUI 44	297.23	1.10	0.30	Yes	27%
EQUI 45	429.33	1.38	0.43	Yes	31%
EQUI 46	429.33	1.38	0.43	Yes	31%
EQUI 53	42.93	0.33	0.04	Yes	13%
EQUI 54	132.10	0.67	0.13	Yes	20%
EQUI 55	132.10	0.67	0.13	Yes	20%
EQUI 56	132.10	0.67	0.13	Yes	20%
EQUI 57	132.10	0.67	0.13	Yes	20%
EQUI 58	132.10	0.67	0.13	Yes	20%
EQUI 59	132.10	0.67	0.13	Yes	20%
EQUI 60	132.10	0.67	0.13	Yes	20%
EQUI 61	132.10	0.67	0.13	Yes	20%
EQUI 62	132.10	0.67	0.13	Yes	20%
EQUI 63	65.84	0.43	0.07	Yes	15%
EQUI 64	65.84	0.43	0.07	Yes	15%
EQUI 65	65.84	0.43	0.07	Yes	15%
EQUI 66	65.84	0.43	0.07	Yes	15%
EQUI 67	65.84	0.43	0.07	Yes	15%
EQUI 68	33.08	0.28	0.03	Yes	12%
EQUI 69	33.08	0.28	0.03	Yes	12%
EQUI 70	33.08	0.28	0.03	Yes	12%
EQUI 71	33.08	0.28	0.03	Yes	12%
EQUI 72	33.08	0.28	0.03	Yes	12%
EQUI 73	11.85	0.15	0.01	Yes	8%
EQUI 74	104.69	0.58	0.10	Yes	18%
EQUI 75	241.64	0.97	0.24	Yes	25%
EQUI 47	45.94	0.35	0.05	Yes	13%
EQUI 76	45.94	0.35	0.05	Yes	13%
EQUI 77	43.59	0.33	0.04	Yes	13%
EQUI 78	3.29	0.07	0.00	Yes	5%
EQUI 79	19.85	0.21	0.02	Yes	10%
EQUI 80	11.85	0.15	0.01	Yes	8%

*IPER limit is based on process weight rate (Minn. R. 7011.7035)

Bora Pharmaceuticals

Equipment Leaks (FUGI 1)

Methanol emissions from fugitive sources are calculated based on component counts together with leak rates from EPA's Protocol for Equipment Leak Emission Estimates, EPA-453/R-95-017, November 1995.

Component Type	Component Count	Leak Rate[1] (kg/hr/source)	Operating Hours	Control Efficectiveness for LDAR[2]	Potential Leak Rate (lb/hr)	VOC Potential Emissions (tpy)	Methanol Potential Emissions (tpy)
Light Liquid Valves	92	0.00403	8,760	84%	0.13	0.57	0.57
Light Liquid Pumps	8	0.0199	8,760	69%	0.11	0.48	0.48
Flanges (Connectors)	290	0.00183	8,760	84%	0.19	0.82	0.82
				Total	0.43	**1.87**	**1.87**

1 - Leak rates from EPA's Protocol for Equipment Leak Emission Estimates, EPA-453/R-95-017, November 1995.

2 - Control effectiveness from Table 5-2 of EPA's Protocol for Equipment Leak Emission Estimates, EPA-453/R-95-017, November 1995. Values used are for monthly monitoring and a 10,000 ppmv leak definition. NESHAP GGG requires LDAR. For connectors, assumed the same as light liquid valves.

Bora Pharmaceuticals
Insignificant activities - dispensing, tablet counter, encapsulation, packaging, weighing

Most of these units vent to controls. However, in order to quality under Minn. R. 7007.1300, subp. 3, they cannot assume the use of controls in their calculations. Therefore, calculated emission rates are conservative

IA Description	Max Dry Material Throughput (ton/hr)	Potential Operating Hours	Emission Factor[1,2] lb/ton	Uncontrolled Emission Rate			Uncontrolled Emissions			PM/PM10 (lb/year)	7007.1300, subp. 3(F) Threshold (tpy)	IA Under MN R. 7007.1300 Subpart 3(F)?
				PM (lb/hr)	PM_{10} (lb/hr)	$PM_{2.5}$[3] (lb/hr)	PM (tpy)	PM_{10} (tpy)	$PM_{2.5}$[3] (tpy)			
Dry Material Dispensing (4)	1.98	8,760	0.061	0.12	0.12	0.12	0.53	0.53	0.53	1060	2000	Yes
Plant B Dry Material Dispensing	0.10	8,760	0.061	0.01	0.01	0.01	0.03	0.03	0.03	53	2000	Yes
Packaging - Tablet Counter	1.98	8,760	0.061	0.12	0.12	0.12	0.53	0.53	0.53	1060	2000	Yes
Encapsulation (Plant B #1)	1.98	8,760	0.061	0.12	0.12	0.12	0.53	0.53	0.53	1060	2000	Yes
Encapsulation (Plant C)	1.98	8,760	0.061	0.12	0.12	0.12	0.53	0.53	0.53	1060	2000	Yes
Encapsulation (Plant B #2)	1.98	8,760	0.061	0.12	0.12	0.12	0.53	0.53	0.53	1060	2000	Yes
Packaging - Powder Line	1.98	8,760	0.061	0.12	0.12	0.12	0.53	0.53	0.53	1060	2000	Yes
Packaging - Canning Line	1.98	8,760	0.061	0.12	0.12	0.12	0.53	0.53	0.53	1060	2000	Yes
Weigh Booth/Dispensing	1.98	8,760	0.061	0.12	0.12	0.12	0.53	0.53	0.53	1060	2000	Yes
Total				0.97	0.97	0.97	4.27	4.27	4.27			

1 - The particulate emission factor for dispensing, encapsulation, and packaging activities is based on AP-42, Table 9.9.1-1, for headhouse and grain handling. This is very conservative because emissions from these units are anticipated to be much lower than calculated for grain handling.

2 - $PM_{2.5}$ emissions are assumed to be the same as PM_{10} emissions.

Bora Pharmaceuticals

Insignificant Activities - Natural Gas Combustion

Boiler	Equipment Description/Name	Fuel Type	Max Fuel Capacity	Fuel Capacity Units
Hot water boiler	Hot Water Boiler 1	Nat Gas	0.199	MMBtu/hr
Hot water boiler	Hot Water Boiler 2	Nat Gas	0.199	MMBtu/hr
Hot water boiler	Hot Water Boiler 3	Nat Gas	0.199	MMBtu/hr
Hot water boiler	Hot Water Boiler 4	Nat Gas	0.199	MMBtu/hr
Hot water boiler	Hot Water Boiler 5	Nat Gas	0.199	MMBtu/hr
Hot water boiler	Hot Water Boiler 6	Nat Gas	0.199	MMBtu/hr
	Total Maximum Capacity:		**1.2**	**MMBtu/hr**

Potential Emissions

Unit Name	Description	Pollutant	Emission Factor (lb/MMBtu)	Capacity (MMBtu/hr)	Hourly Potential Emissions (lb/hr)	Annual Potential Emissions (tpy)	lb/year (tpy for CO2e)	Minn. R. 7007.1300, subp. 3(F) threshold (lb/year) (tpy for CO2e)	Insignificant Activity Under Minn. R. 7007.1300 Subp. 3(F)?
Hot Water Boiler 1	Natural Gas	PM10	4.8E-03	0.199	9.6E-04	0.004	8.4	2000	Yes
		SO2	5.9E-04	0.199	1.2E-04	0.001	1.0	2000	Yes
		CO	3.9E-02	0.199	7.8E-03	0.034	68.4	4000	Yes
		PM	4.8E-03	0.199	9.6E-04	0.004	8.4	2000	Yes
		VOC	5.4E-03	0.199	1.1E-03	0.005	9.4	2000	Yes
		CO2e	1.2E+02	0.199	2.3E+01	102.082	102.1	1000	Yes
		NOx	9.2E-02	0.199	1.8E-02	0.080	160.7	2000	Yes
Hot Water Boiler 2	Natural Gas	PM10	4.8E-03	0.199	9.6E-04	0.004	8.4	2000	Yes
		SO2	5.9E-04	0.199	1.2E-04	0.001	1.0	2000	Yes
		CO	3.9E-02	0.199	7.8E-03	0.034	68.4	4000	Yes
		PM	4.8E-03	0.199	9.6E-04	0.004	8.4	2000	Yes
		VOC	5.4E-03	0.199	1.1E-03	0.005	9.4	2000	Yes
		CO2e	1.2E+02	0.199	2.3E+01	102.044	102.0	1000	Yes
		NOx	9.2E-02	0.199	1.8E-02	0.080	160.7	2000	Yes
Hot Water Boiler 3	Natural Gas	PM10	4.8E-03	0.199	9.6E-04	0.004	8.4	2000	Yes
		SO2	5.9E-04	0.199	1.2E-04	0.001	1.0	2000	Yes
		CO	3.9E-02	0.199	7.8E-03	0.034	68.4	4000	Yes
		PM	4.8E-03	0.199	9.6E-04	0.004	8.4	2000	Yes
		VOC	5.4E-03	0.199	1.1E-03	0.005	9.4	2000	Yes
		CO2e	1.2E+02	0.199	2.3E+01	102.082	102.1	1000	Yes
		NOx	9.2E-02	0.199	1.8E-02	0.080	160.7	2000	Yes
Hot Water Boiler 4	Natural Gas	PM10	4.8E-03	0.199	9.6E-04	0.004	8.4	2000	Yes
		SO2	5.9E-04	0.199	1.2E-04	0.001	1.0	2000	Yes
		CO	3.9E-02	0.199	7.8E-03	0.034	68.4	4000	Yes
		PM	4.8E-03	0.199	9.6E-04	0.004	8.4	2000	Yes
		VOC	5.4E-03	0.199	1.1E-03	0.005	9.4	2000	Yes
		CO2e	1.2E+02	0.199	2.3E+01	102.082	102.1	1000	Yes
		NOx	9.2E-02	0.199	1.8E-02	0.080	160.7	2000	Yes
Hot Water Boiler 5	Natural Gas	PM10	4.8E-03	0.199	9.6E-04	0.004	8.4	2000	Yes
		SO2	5.9E-04	0.199	1.2E-04	0.001	1.0	2000	Yes
		CO	3.9E-02	0.199	7.8E-03	0.034	68.4	4000	Yes
		PM	4.8E-03	0.199	9.6E-04	0.004	8.4	2000	Yes
		VOC	5.4E-03	0.199	1.1E-03	0.005	9.4	2000	Yes
		CO2e	1.2E+02	0.199	2.3E+01	102.082	102.1	1000	Yes
		NOx	9.2E-02	0.199	1.8E-02	0.080	160.7	2000	Yes
Hot Water Boiler 6	Natural Gas	PM10	4.8E-03	0.199	9.6E-04	0.004	8.4	2000	Yes
		SO2	5.9E-04	0.199	1.2E-04	0.001	1.0	2000	Yes
		CO	3.9E-02	0.199	7.8E-03	0.034	68.4	4000	Yes
		PM	4.8E-03	0.199	9.6E-04	0.004	8.4	2000	Yes
		VOC	5.4E-03	0.199	1.1E-03	0.005	9.4	2000	Yes
		CO2e	1.2E+02	0.199	2.3E+01	102.082	102.1	1000	Yes
		NOx	9.2E-02	0.199	1.8E-02	0.080	160.7	2000	Yes

1 - SO2, CO, VOC, and NOx natural gas emission factors from AP-42 Section 1.4.

2 - assume PM=PM10.

3 - CO2e emission factors from 40 CFR Part 98, subp. A, and global warming potentials from 40 CFR pt. 98, subp. C, Table C-1 and C-2

		lb/mmBtu	mmBtu/hr	lb/hr	tpy
Speciated GHG	CO2	117	1.2	139.69	612
	CH4	0.002205	1.2	2.63E-03	0.012
	N2O	0.0002205	1.2	2.63E-04	0.001
	CO2e	117	1.2	1.40E+02	612
	GWP	methane	28		
		nitrous oxide	265		

Attachment 2 – Subject item inventory and facility requirements

SI List

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	
Activity	Insignificant Air Emissions Activity	ACTV 3	Null	All IAs	
Agency Interest	Conventional Site	AISI 89958	Null	Null	
Component Group	Air Component Group	COMG 2	Null	VOC Cap	
		COMG 3	Null	Milling Activities	
		COMG 4	Null	NESHAP GGG	
		COMG 6	Null	Process tanks and high shear granulation	
Equipment	Boiler	EQUI 3	Null	Boiler 2W	
		EQUI 4	Null	Boiler 3W	
		EQUI 5	Null	Boiler 1	
		EQUI 6	Null	Boiler 2	
		EQUI 7	Null	Boiler Plant B	
		EQUI 8	Null	HPSB01	
		EQUI 9	Null	HPSB02	
		EQUI 10	Null	Boiler 3E	
		EQUI 11	Null	HWB01	
		EQUI 12	Null	HWB02	
	Chemical Milling Equipment	EQUI 27	Null	Mill 1	
		EQUI 28	Null	Mill 2	
		EQUI 29	Null	Mill 3	
		EQUI 30	Null	Mill 4	
		EQUI 31	Null	Mill 5	
		EQUI 32	Null	Mill 6	
		EQUI 49	Null	Mill 7	
		EQUI 50	Null	Mill 8	
		EQUI 51	Null	Mill 9	
		EQUI 52	Null	Mill 10	
	Cleaning Equipment	EQUI 48	Null	Cleaning Operations	
	Data Acquisition System	EQUI 82	Null	Building Management System	
	Mixing Equipment	EQUI 43	Null	Solution Prep Tank (Fluid Bed Processor) #3	
		EQUI 44	Null	Solution Prep Tank (Fluid Bed Processor) #4	
		EQUI 45	Null	Solution Prep Tank (Fluid Bed Processor) #5	
		EQUI 46	Null	Solution Prep Tank (Fluid Bed Processor) #6	
		EQUI 47	Null	Plant B Solution Prep Tank 1	
		EQUI 53	Null	Solution Prep Tank (Fluid Bed Processor) #1	
		EQUI 54	Null	Solution Prep Tank (Fluid Bed Processor) #2	
		EQUI 55	Null	Solution Prep Tank (Fluid Bed Processor) #7	
		EQUI 56	Null	Solution Prep Tank (Fluid Bed Processor) #8	
		EQUI 57	Null	Solution Prep Tank (Fluid Bed Processor) #9	
		EQUI 58	Null	Solution Prep Tank (Fluid Bed Processor) #10	
		EQUI 59	Null	Solution Prep Tank (Fluid Bed Processor) #11	
		EQUI 60	Null	Solution Prep Tank (Fluid Bed Processor) #12	
		EQUI 61	Null	Solution Prep Tank (Fluid Bed Processor) #13	
		EQUI 62	Null	Solution Prep Tank (Fluid Bed Processor) #14	
		EQUI 63	Null	Solution Prep Tank (High Shear Granulator) #1	
		EQUI 64	Null	Solution Prep Tank (High Shear Granulator) #2	
		EQUI 65	Null	Solution Prep Tank (High Shear Granulator) #3	
		EQUI 66	Null	Solution Prep Tank (High Shear Granulator) #4	
		EQUI 67	Null	Solution Prep Tank (High Shear Granulator) #5	
		EQUI 68	Null	Solution Holding Tank (Tablet Coater) #1	
		EQUI 69	Null	Solution Holding Tank (Tablet Coater) #2	
		EQUI 70	Null	Solution Holding Tank (Tablet Coater) #3	
		EQUI 71	Null	Solution Holding Tank (Tablet Coater) #4	
		EQUI 72	Null	Solution Holding Tank (Tablet Coater) #5	
		EQUI 73	Null	High Shear Granulator #1	
		EQUI 74	Null	High Shear Granulator #2	
		EQUI 75	Null	High Shear Granulator #3	
		EQUI 76	Null	Plant B Solution Prep Tank 4	
		EQUI 77	Null	Plant B Solution Prep Tank 2	
		EQUI 78	Null	Plant B Solution Prep Tank 5	
		EQUI 79	Null	Plant B Solution Holding Tank 5	
		EQUI 80	Null	Plant B High Shear Granulator 4	
	Parametric Monitor	EQUI 83	Null	TREA 1 Combustion Chamber Temperature TE-03	
		EQUI 84	Null	TREA 1 Combustion Chamber Temperature TE-04	
	Spraying Equipment	EQUI 15	Null	Fluid Bed Processor 2	
		EQUI 16	Null	Fluid Bed Processor 1	
		EQUI 17	Null	Fluid Bed Processor 4	
		EQUI 18	Null	Fluid Bed Processor 3	
		EQUI 19	Null	Fluid Bed Processor 5	
		EQUI 22	Null	Tablet Coater 1	
		EQUI 23	Null	Tablet Coater 2	
		EQUI 24	Null	Tablet Coater 3	
		EQUI 25	Null	Tablet Coater 4	
		EQUI 26	Null	Tablet Coater 5	

SI List

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	
Equipment	Spraying Equipment	EQUI 33	Null	Plant B Fluid Bed Processor	
		EQUI 34	Null	Plant B Tablet Coater	
Fugitive	Equipment Leaks	FUGI 1	Null	Equipment Leaks	
Structure	Building	STRU 1	Null	Original Building	
		STRU 2	Null	West Expansion	
		STRU 3	Null	East Expansion	
	Stack/Vent	STRU 5	Null	Boiler 2W Stack	
		STRU 6	Null	Boiler 3W Stack	
		STRU 7	Null	Boiler 1 Stack	
		STRU 8	Null	Boiler 2 Stack	
		STRU 9	Null	Boiler Plant B 1 Stack	
		STRU 10	Null	Boiler 1E Stack	
		STRU 11	Null	Boiler 2E Stack	
		STRU 12	Null	Boiler 3E Stack	
		STRU 13	Null	Boiler 4E Stack	
		STRU 14	Null	Boiler 5E Stack	
		STRU 16	Null	Regenerative Thermal Oxidizer 1 Stack	
		STRU 17	Null	Fluid Bed Processor 2 Stack	
		STRU 18	Null	Fluid Bed Processor 1 Stack	
		STRU 19	Null	Fluid Bed Processor 4 Stack	
		STRU 20	Null	Fluid Bed Processor 3 Stack	
		STRU 21	Null	Fluid Bed Processor 5 Stack	
		STRU 24	Null	Tablet Coater 1 Stack	
		STRU 25	Null	Tablet Coater 2 Stack	
		STRU 26	Null	Tablet Coater 3 Stack	
		STRU 27	Null	Tablet Coater 4 Stack	
		STRU 28	Null	Tablet Coater 5 Stack	
		STRU 29	Null	General Building Stack 1	
		STRU 30	Null	General Building Stack 2	
		STRU 31	Null	General Building Stack 3	
		STRU 32	Null	General Building Stack 4	
		STRU 33	Null	Process Vent 1	
		STRU 34	Null	Process Vent 2	
		STRU 35	Null	Plant B Process Vent	
		STRU 36	Null	Plant B Fluid Bed Processor Stack	
		STRU 37	Null	Plant B Tablet Coater Stack	
		STRU 38	Null	Exhaust Fan 1 Stack	
		STRU 39	Null	Exhaust Fan 2 Stack	
		STRU 40	Null	Exhaust Fan 3 Stack	
		STRU 41	Null	Exhaust Fan 4 Stack	
		STRU 42	Null	Process Vent 3	
		STRU 43	Null	Process Vent 4	
		STRU 44	Null	Process Vent 5	
		STRU 45	Null	Process Vent 6	
		STRU 46	Null	Process Vent 7	
		STRU 47	Null	Process Vent 8	
		STRU 48	Null	Process Vent 9	
		STRU 49	Null	Process Vent 10	
		STRU 50	Null	Process Vent 11	
		STRU 51	Null	Process Vent 12	
		STRU 52	Null	Process Vent 13	
		STRU 53	Null	Process Vent 14	
		STRU 54	Null	Process Vent 15	
		STRU 55	Null	Process Vent 16	
		STRU 56	Null	High Shear Granulator 1 Stack	
		STRU 57	Null	High Shear Granulator 2 Stack	
		STRU 58	Null	High Shear Granulator 3 Stack	
Total Facility	Air Quality Total Facility	TFAC 1	Null	Bora Pharmaceuticals Inc.	
Treatment	017-Fabric Filter - Med Temp, 180 F<T<250 F	TREA 2	Null	Dust Collector Fluid Bed Processor 2	
		TREA 3	Null	Dust Collector Fluid Bed Processor 1	
		TREA 4	Null	Dust Collector Fluid Bed Processor 4	
		TREA 5	Null	Dust Collector Fluid Bed Processor 3	
		TREA 6	Null	Dust Collector Fluid Bed Processor 5	
		TREA 9	Null	Dust Collector Tablet Coater 1	
		TREA 10	Null	Dust Collector Tablet Coater 2	
		TREA 11	Null	Dust Collector Tablet Coater 3	
		TREA 12	Null	Dust Collector Tablet Coater 4	
		TREA 13	Null	Dust Collector Tablet Coater 5	
		TREA 14	Null	Dust Collector General Building 1	
		TREA 15	Null	Dust Collector General Building 2	
		TREA 16	Null	Dust Collector General Building 3	
		TREA 17	Null	Dust Collector General Building 4	
		TREA 18	Null	Dust Collector Plant B Fluid Bed Processor	

SI List

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	
Treatment	017-Fabric Filter - Med Temp, 180 F<T<250 F	TREA 19	Null	Dust Collector Plant B Tablet Coater	
	131-Thermal Oxidizer	TREA 1	Null	Regenerative Thermal Oxidizer 1	

Insignificant Activities

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Status Description	Sub Attribute Description	
Activity	Insignificant Air Emissions Activity	Active / Existing	Minn. R. 7007.1300, subp. 3(D)	
			Minn. R. 7007.1300, subp. 3(F)	

Emission Units 1

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Type	Subject Item ID	Delta Designation	Description	Manufacturer	Model	Max Design Capacity	Max Design Capacity Units	Material	Firing Method	Subject to CSAPR?	Electric Generating Capacity (MW)	Construction Start Date	Operation Start Date	Modification Date	
Boiler	EQUI 3	Null	Boiler 2W	Cleaver Brooks	VG-30	3	million British thermal units/hours	Energy	Not coal burning	N	Null	8/1/2014	10/1/2014	Null	
	EQUI 4	Null	Boiler 3W	Cleaver Brooks	VG-30	3	million British thermal units/hours	Energy	Not coal burning	N	Null	8/1/2014	10/1/2014	Null	
	EQUI 5	Null	Boiler 1	Bryan	HECL210-W-FDG	2.1	million British thermal units/hours	Energy	Not coal burning	N	Null	7/1/2003	9/1/2003	Null	
	EQUI 6	Null	Boiler 2	Bryan	HECL210-W-FDG	2.1	million British thermal units/hours	Energy	Not coal burning	N	Null	7/1/2003	9/1/2003	Null	
	EQUI 7	Null	Boiler Plant B	Precision Boilers	FPS-58-60-15-P-N	3,266	standard cubic feet/hours	Natural Gas	Not coal burning	N	Null	1/23/2020	8/7/2020	Null	
	EQUI 8	Null	HPSB01	Cleaver Brooks	CBEX-P-700-400-150ST	16.74	million British thermal units/hours	Energy	Not coal burning	N	Null	4/15/2021	9/30/2021	Null	
	EQUI 9	Null	HPSB02	Cleaver Brooks	CBEX-P-700-400-150ST	16.74	million British thermal units/hours	Energy	Not coal burning	N	Null	4/15/2021	9/30/2021	Null	
	EQUI 10	Null	Boiler 3E	Johnston Boiler Company	PFTX 600-4	24,199	standard cubic feet/hours	Natural Gas	Not coal burning	N	Null	TBD	TBD	Null	
	EQUI 11	Null	HWB01	AERCO	BMK 4000	4	million British thermal units/hours	Energy	Not coal burning	N	Null	4/15/2021	2/8/2022	Null	
	EQUI 12	Null	HWB02	AERCO	BMK 4000	4	million British thermal units/hours	Energy	Not coal burning	N	Null	4/15/2021	2/28/2022	Null	

Emission Units 3

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Type	Subject Item ID	Delta Designation	Description	Manufacturer	Model	Max Design Capacity	Max Design Capacity Units	Material	Construction Start Date	Operation Start Date	Modification Date	
Chemical Milling Equipment	EQUI 27	Null	Mill 1	Quadro	U29 Comil	1.98	tons/hours	Material	11/23/2022	11/23/2022	Null	
	EQUI 28	Null	Mill 2	Quadro	U20 Comil	1.98	tons/hours	Material	1/12/2023	1/12/2023	Null	
	EQUI 29	Null	Mill 3	Quadro	194 Ultra	1.98	tons/hours	Material	12/11/2022	12/11/2022	Null	
	EQUI 30	Null	Mill 4	Quadro	194S	1.98	tons/hours	Material	12/11/2022	12/1/2022	Null	
	EQUI 31	Null	Mill 5	FitzMill	DA06	1.98	tons/hours	Material	5/24/2023	5/24/2023	Null	
	EQUI 32	Null	Mill 6	QUADRO	COMIL 197S	1.98	tons/hours	Material	3/12/2026	3/12/2026	Null	
	EQUI 49	Null	Mill 7	TBD	TBD	1.98	tons/hours	Material	TBD	TBD	Null	
	EQUI 50	Null	Mill 8	TBD	TBD	1.98	tons/hours	Material	TBD	TBD	Null	
	EQUI 51	Null	Mill 9	TBD	TBD	1.98	tons/hours	Material	TBD	TBD	Null	
	EQUI 52	Null	Mill 10	TBD	TBD	1.98	tons/hours	Material	TBD	TBD	Null	
Cleaning Equipment	EQUI 48	Null	Cleaning Operations	Custom	Custom	33	pounds/days	Solvents	8/1/2020	8/1/2020	Null	
Mixing Equipment	EQUI 43	Null	Solution Prep Tank (Fluid Bed Processor) #3	Mueller	Custom	450	gallons/each	Material	12/8/2021	5/17/2023	Null	
	EQUI 44	Null	Solution Prep Tank (Fluid Bed Processor) #4	Mueller	Custom	450	gallons/each	Material	2/18/2022	5/17/2023	Null	
	EQUI 45	Null	Solution Prep Tank (Fluid Bed Processor) #5	TBD	TBD	650	gallons/each	Material	TBD	TBD	Null	
	EQUI 46	Null	Solution Prep Tank (Fluid Bed Processor) #6	TBD	TBD	650	gallons/each	Material	TBD	TBD	Null	
	EQUI 47	Null	Plant B Solution Prep Tank 1	Alloy Products Corp	Custom	70	gallons/each	Material	8/28/2020	9/1/2020	Null	
	EQUI 53	Null	Solution Prep Tank (Fluid Bed Processor) #1	Walker	Custom	65	gallons/each	Material	6/19/2023	6/19/2023	Null	
	EQUI 54	Null	Solution Prep Tank (Fluid Bed Processor) #2	TBD	TBD	200	gallons/each	Material	TBD	TBD	Null	
	EQUI 55	Null	Solution Prep Tank (Fluid Bed Processor) #7	TBD	TBD	200	gallons/each	Material	TBD	TBD	Null	
	EQUI 56	Null	Solution Prep Tank (Fluid Bed Processor) #8	TBD	TBD	200	gallons/each	Material	TBD	TBD	Null	
	EQUI 57	Null	Solution Prep Tank (Fluid Bed Processor) #9	TBD	TBD	200	gallons/each	Material	TBD	TBD	Null	
	EQUI 58	Null	Solution Prep Tank (Fluid Bed Processor) #10	TBD	TBD	200	gallons/each	Material	TBD	TBD	Null	

Emission Units 3

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Type	Subject Item ID	Delta Designation	Description	Manufacturer	Model	Max Design Capacity	Max Design Capacity Units	Material	Construction Start Date	Operation Start Date	Modification Date	
Mixing Equipment	EQUI 59	Null	Solution Prep Tank (Fluid Bed Processor) #11	TBD	TBD	200	gallons/each	Material	TBD	TBD	Null	
	EQUI 60	Null	Solution Prep Tank (Fluid Bed Processor) #12	TBD	TBD	200	gallons/each	Material	TBD	TBD	Null	
	EQUI 61	Null	Solution Prep Tank (Fluid Bed Processor) #13	TBD	TBD	200	gallons/each	Material	TBD	TBD	Null	
	EQUI 62	Null	Solution Prep Tank (Fluid Bed Processor) #14	TBD	TBD	200	gallons/each	Material	TBD	TBD	Null	
	EQUI 63	Null	Solution Prep Tank (High Shear Granulator) #1	TBD	TBD	100	gallons/each	Material	TBD	TBD	Null	
	EQUI 64	Null	Solution Prep Tank (High Shear Granulator) #2	TBD	TBD	100	gallons/each	Material	TBD	TBD	Null	
	EQUI 65	Null	Solution Prep Tank (High Shear Granulator) #3	TBD	TBD	100	gallons/each	Material	TBD	TBD	Null	
	EQUI 66	Null	Solution Prep Tank (High Shear Granulator) #4	TBD	TBD	100	gallons/each	Material	TBD	TBD	Null	
	EQUI 67	Null	Solution Prep Tank (High Shear Granulator) #5	TBD	TBD	100	gallons/each	Material	TBD	TBD	Null	
	EQUI 68	Null	Solution Holding Tank (Tablet Coater) #1	Mueller	Custom	65	gallons/each	Material	6/19/2023	6/19/2023	Null	
	EQUI 69	Null	Solution Holding Tank (Tablet Coater) #2	TBD	TBD	100	gallons/each	Material	TBD	TBD	Null	
	EQUI 70	Null	Solution Holding Tank (Tablet Coater) #3	TBD	TBD	100	gallons/each	Material	TBD	TBD	Null	
	EQUI 71	Null	Solution Holding Tank (Tablet Coater) #4	TBD	TBD	100	gallons/each	Material	TBD	TBD	Null	
	EQUI 72	Null	Solution Holding Tank (Tablet Coater) #5	TBD	TBD	100	gallons/each	Material	TBD	TBD	Null	
	EQUI 73	Null	High Shear Granulator #1	Glatt	VG65M/25	21	gallons/each	Material	10/11/2023	12/12/2023	Null	
	EQUI 74	Null	High Shear Granulator #2	TBD	TBD	367	gallons/each	Material	7/28/2025	TBD	Null	
	EQUI 75	Null	High Shear Granulator #3	TBD	TBD	367	gallons/each	Material	TBD	TBD	Null	
	EQUI 76	Null	Plant B Solution Prep Tank 4	TBD	TBD	70	gallons/each	Material	TBD	TBD	Null	
	EQUI 77	Null	Plant B Solution Prep Tank 2	ABC	Custom	80	gallons/each	Material	8/28/2020	9/1/2020	Null	
	EQUI 78	Null	Plant B Solution Prep Tank 5	TBD	TBD	5	gallons/each	Material	TBD	TBD	Null	
	EQUI 79	Null	Plant B Solution Holding Tank 5	ABC	Custom	66	gallons/each	Material	3/5/2021	3/5/2021	Null	
	EQUI 80	Null	Plant B High Shear Granulator 4	Glatt	VG65	21	gallons/each	Material	5/26/2020	9/28/2020	Null	

Emission Units 3

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Type	Subject Item ID	Delta Designation	Description	Manufacturer	Model	Max Design Capacity	Max Design Capacity Units	Material	Construction Start Date	Operation Start Date	Modification Date	
Spraying Equipment	EQUI 15	Null	Fluid Bed Processor 2	Glatt	GPCG 120	600	kilograms/batch	Solvents	2/24/2021	5/17/2023	Null	
	EQUI 16	Null	Fluid Bed Processor 1	Glatt	GPCG 300	1,200	kilograms/batch	Solvents	2/24/2021	5/17/2023	Null	
	EQUI 17	Null	Fluid Bed Processor 4	Glatt	300	1,200	kilograms/batch	Solvents	TBD	TBD	Null	
	EQUI 18	Null	Fluid Bed Processor 3	Glatt	300	1,200	kilograms/batch	Material	TBD	TBD	Null	
	EQUI 19	Null	Fluid Bed Processor 5	Glatt	60	150	kilograms/batch	Solvents	TBD	TBD	Null	
	EQUI 22	Null	Tablet Coater 1	O'Hara	LC150	180	kilograms/batch	Solvents	10/12/2021	5/17/2023	Null	
	EQUI 23	Null	Tablet Coater 2	Accela	60"	180	kilograms/batch	Solvents	TBD	TBD	Null	
	EQUI 24	Null	Tablet Coater 3	Accela	60"	180	kilograms/batch	Solvents	TBD	TBD	Null	
	EQUI 25	Null	Tablet Coater 4	Accela	60"	180	kilograms/batch	Solvents	TBD	TBD	Null	
	EQUI 26	Null	Tablet Coater 5	Accela	60"	180	kilograms/batch	Solvents	TBD	TBD	Null	
	EQUI 33	Null	Plant B Fluid Bed Processor	Glatt	GPCG 30	120	kilograms/batch	Solvents	12/17/2019	10/5/2020	Null	
	EQUI 34	Null	Plant B Tablet Coater	O'Hara	LC 75	18	kilograms/batch	Solvents	8/1/2020	1/4/2021	Null	

Component Groups

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item ID	Delta Designation	Description	Group Member ID	
COMG 2	Null	VOC Cap	EQUI 3	
			EQUI 4	
			EQUI 5	
			EQUI 6	
			EQUI 7	
			EQUI 8	
			EQUI 9	
			EQUI 10	
			EQUI 11	
			EQUI 12	
			EQUI 15	
			EQUI 16	
			EQUI 17	
			EQUI 19	
			EQUI 22	
			EQUI 33	
			EQUI 34	
			EQUI 43	
			EQUI 44	
			EQUI 45	
			EQUI 46	
			EQUI 47	
			EQUI 48	
			EQUI 53	
			EQUI 54	
			EQUI 55	
			EQUI 56	
			EQUI 57	
			EQUI 58	
			EQUI 59	
			EQUI 60	
			EQUI 61	
			EQUI 62	
			EQUI 63	
			EQUI 64	
			EQUI 65	
			EQUI 66	
			EQUI 67	
			EQUI 68	

Component Groups

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item ID	Delta Designation	Description	Group Member ID	
COMG 2	Null	VOC Cap	EQUI 69	
			EQUI 70	
			EQUI 71	
			EQUI 72	
			EQUI 73	
			EQUI 74	
			EQUI 75	
			EQUI 76	
			EQUI 77	
			EQUI 78	
			EQUI 79	
			EQUI 80	
			TREA 1	
COMG 3	Null	Milling Activities	EQUI 27	
			EQUI 28	
			EQUI 29	
			EQUI 30	
			EQUI 31	
			EQUI 32	
			EQUI 49	
			EQUI 50	
			EQUI 51	
			EQUI 52	
COMG 4	Null	NESHAP GGG	EQUI 15	
			EQUI 16	
			EQUI 17	
			EQUI 18	
			EQUI 19	
			EQUI 22	
			EQUI 23	
			EQUI 24	
			EQUI 25	
			EQUI 26	
			EQUI 33	
			EQUI 34	
			EQUI 43	
			EQUI 44	
			EQUI 45	
			EQUI 46	

Component Groups

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item ID	Delta Designation	Description	Group Member ID	
COMG 4	Null	NESHAP GGG	EQUI 47	
			EQUI 48	
			EQUI 53	
			EQUI 54	
			EQUI 55	
			EQUI 56	
			EQUI 57	
			EQUI 58	
			EQUI 59	
			EQUI 60	
			EQUI 61	
			EQUI 62	
			EQUI 76	
			FUGI 1	
COMG 6	Null	Process tanks and high shear granulation	EQUI 43	
			EQUI 44	
			EQUI 45	
			EQUI 46	
			EQUI 47	
			EQUI 53	
			EQUI 54	
			EQUI 55	
			EQUI 56	
			EQUI 57	
			EQUI 58	
			EQUI 59	
			EQUI 60	
			EQUI 61	
			EQUI 62	
			EQUI 63	
			EQUI 64	
			EQUI 65	
			EQUI 66	
			EQUI 67	
			EQUI 68	
			EQUI 69	
			EQUI 70	
			EQUI 71	
			EQUI 72	

Component Groups

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item ID	Delta Designation	Description	Group Member ID	
COMG 6	Null	Process tanks and high shear granulation	EQUI 73	
			EQUI 74	
			EQUI 75	
			EQUI 76	
			EQUI 77	
			EQUI 78	
			EQUI 79	
			EQUI 80	

PTE by SI

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Pollutant	Potential (lbs/hr)	Unrestricted Potential (tons/yr)	Potential Limited (tons/yr)	Actual Emissions (tons/yr)
Component Group	Air Component Group	COMG 2	Null	VOC Cap	HAPs - Total	0	0	90	
					Methanol	0	0	90	
					Volatile Organic Compounds	0	0	90	
Equipment	Boiler	EQUI 3	Null	Boiler 2W	1,4-Dichlorobenzene (para-)	0.0685	0.0156	0.0156	
					Arsenic compounds	5.9e-07	2.6e-06	2.6e-06	
					Benzene	6.2e-06	2.7e-05	2.7e-05	
					Beryllium Compounds	3.5e-08	1.5e-07	1.5e-07	
					Cadmium compounds	3.2e-06	1.4e-05	1.4e-05	
					Carbon Dioxide	352.94	1,546	1,546	
					Carbon Dioxide Equivalent	355.04	1,555	1,555	
					Carbon Monoxide	0.25	1.08	1.08	
					Chromium compounds	4.1e-06	1.8e-05	1.8e-05	
					Cobalt compounds	2.5e-07	1.1e-06	1.1e-06	
					Formaldehyde	0.00022	0.00097	0.00097	
					HAPs - Total	0.01	0.02	0.02	
					Hexane	0.0053	0.023	0.023	
					Lead Compounds	1.5e-06	6.4e-06	6.4e-06	
					Manganese compounds	1.1e-06	4.9e-06	4.9e-06	
					Mercury Compounds	7.6e-07	3.3e-06	3.3e-06	
					Methane	0.01	0.03	0.03	
					Naphthalene	1.8e-06	7.9e-06	7.9e-06	
					Nickel compounds	6.2e-06	2.7e-05	2.7e-05	
					Nitrogen Oxides	0.29	1.29	1.29	
					Nitrous Oxide	0.01	0.03	0.03	
					Particulate Matter	0.02	0.1	0.1	
					PM < 2.5 micron	0.02	0.1	0.1	
					PM < 10 micron	0.02	0.1	0.1	
					Polycyclic organic matter	0.000698	6.85e-07	6.85e-07	
					Selenium compounds	7.1e-08	3.1e-07	3.1e-07	
					Sulfur Dioxide	0.0018	0.01	0.01	
					Toluene	1e-05	4.4e-05	4.4e-05	
					Volatile Organic Compounds	0.02	0.07	0	
		EQUI 4	Null	Boiler 3W	1,4-Dichlorobenzene (para-)	3.53e-06	1.55e-05	1.55e-05	
					Arsenic compounds	5.9e-07	2.6e-06	2.6e-06	
					Benzene	6.2e-06	2.7e-05	2.7e-05	
					Beryllium Compounds	3.5e-08	1.5e-07	1.5e-07	
					Cadmium compounds	3.2e-06	1.4e-05	1.4e-05	
					Carbon Dioxide	352.94	1,546	1,546	
					Carbon Dioxide Equivalent	355.04	1,555	1,555	
					Carbon Monoxide	0.25	1.08	1.08	
					Chromium compounds	4.1e-06	1.8e-05	1.8e-05	
					Cobalt compounds	2.5e-07	1.1e-06	1.1e-06	
					Formaldehyde	0.00022	0.00097	0.00097	
					HAPs - Total	0.01	0.02	0.02	
					Hexane	0.0053	0.023	0.023	
					Lead Compounds	1.5e-06	6.4e-06	6.4e-06	
					Manganese compounds	1.1e-06	4.9e-06	4.9e-06	
					Mercury Compounds	7.6e-07	3.3e-06	3.3e-06	
					Methane	0.01	0.03	0.03	
					Naphthalene	1.8e-06	7.9e-06	7.9e-06	
					Nickel compounds	6.2e-06	2.7e-05	2.7e-05	
					Nitrogen Oxides	0.29	1.29	1.29	
					Nitrous Oxide	0.01	0.03	0.03	
					Particulate Matter	0.02	0.1	0.1	
					PM < 2.5 micron	0.02	0.1	0.1	
					PM < 10 micron	0.02	0.1	0.1	
					Polycyclic organic matter	2.1e-06	8.99e-06	8.99e-06	
					Selenium compounds	7.1e-08	3.1e-07	3.1e-07	
					Sulfur Dioxide	0.0018	0.01	0.01	
					Toluene	1e-05	4.4e-05	4.4e-05	
					Volatile Organic Compounds	0.02	0.07	0	
		EQUI 5	Null	Boiler 1	1,4-Dichlorobenzene (para-)	2.47e-06	1.08e-05	1.08e-05	
					Arsenic compounds	4.1e-07	1.8e-06	1.8e-06	
					Benzene	4.3e-06	1.9e-05	1.9e-05	
					Beryllium Compounds	2.5e-08	1.1e-07	1.1e-07	
					Cadmium compounds	2.3e-06	9.9e-06	9.9e-06	
					Carbon Dioxide	247.06	1,082	1,082	
					Carbon Dioxide Equivalent	248.53	1,089	1,089	
					Carbon Monoxide	0.17	0.76	0.76	
					Chromium compounds	2.9e-06	1.3e-05	1.3e-05	
					Cobalt compounds	1.7e-07	7.6e-07	7.6e-07	
					Formaldehyde	0.00015	0.00068	0.00068	

PTE by SI

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Pollutant	Potential (lbs/hr)	Unrestricted Potential (tons/yr)	Potential Limited (tons/yr)	Actual Emissions (tons/yr)
Equipment	Boiler	EQUI 5	Null	Boiler 1	HAPs - Total	0.0039	0.02	0.02	
					Hexane	0.0037	0.016	0.016	
					Lead Compounds	1e-06	4.5e-06	4.5e-06	
					Manganese compounds	7.8e-07	3.4e-06	3.4e-06	
					Mercury Compounds	5.4e-07	2.3e-06	2.3e-06	
					Methane	0.0047	0.02	0.02	
					Naphthalene	1.3e-06	5.5e-06	5.5e-06	
					Nickel compounds	4.3e-06	1.9e-05	1.9e-05	
					Nitrogen Oxides	0.21	0.9	0.9	
					Nitrous Oxide	0.0045	0.02	0.02	
					Particulate Matter	0.02	0.07	0.07	
					PM < 2.5 micron	0.02	0.07	0.07	
					PM < 10 micron	0.02	0.07	0.07	
					Polycyclic organic matter	2.05e-06	8.99e-06	8.99e-06	
					Selenium compounds	4.9e-08	2.2e-07	2.2e-07	
					Sulfur Dioxide	0.0012	0.01	0.01	
					Toluene	7e-06	3.1e-05	3.1e-05	
					Volatile Organic Compounds	0.01	0.05	0	
		EQUI 6	Null	Boiler 2	1,4-Dichlorobenzene (para-)	2.47e-06	1.08e-05	1.08e-05	
					Arsenic compounds	4.1e-07	1.8e-06	1.8e-06	
					Benzene	4.3e-06	1.9e-05	1.9e-05	
					Beryllium Compounds	2.5e-08	1.1e-07	1.1e-07	
					Cadmium compounds	2.3e-06	9.9e-06	9.9e-06	
					Carbon Dioxide	247.06	1,082	1,082	
					Carbon Dioxide Equivalent	248.53	1,089	1,089	
					Carbon Monoxide	0.17	0.76	0.76	
					Chromium compounds	2.9e-06	1.3e-05	1.3e-05	
					Cobalt compounds	1.7e-07	7.6e-07	7.6e-07	
					Formaldehyde	0.00015	0.00068	0.00068	
					HAPs - Total	0.0039	0.02	0.02	
					Hexane	0.0037	0.016	0.016	
					Lead Compounds	1e-06	4.5e-06	4.5e-06	
					Manganese compounds	7.8e-07	3.4e-06	3.4e-06	
					Mercury Compounds	5.4e-07	2.3e-06	2.3e-06	
					Methane	0.0047	0.02	0.02	
					Naphthalene	1.3e-06	5.5e-06	5.5e-06	
					Nickel compounds	4.3e-06	1.9e-05	1.9e-05	
					Nitrogen Oxides	0.21	0.9	0.9	
					Nitrous Oxide	0.0045	0.02	0.02	
					Particulate Matter	0.02	0.07	0.07	
					PM < 2.5 micron	0.02	0.07	0.07	
					PM < 10 micron	0.02	0.07	0.07	
					Polycyclic organic matter	1.44e-06	6.3e-06	6.3e-06	
					Selenium compounds	4.9e-08	2.2e-07	2.2e-07	
					Sulfur Dioxide	0.0012	0.01	0.01	
					Toluene	7e-06	3.1e-05	3.1e-05	
					Volatile Organic Compounds	0.01	0.05	0	
		EQUI 7	Null	Boiler Plant B	1,4-Dichlorobenzene (para-)	3.9e-06	1.7e-05	1.7e-05	
					Arsenic compounds	6.5e-07	2.9e-06	2.9e-06	
					Benzene	6.9e-06	3e-05	3e-05	
					Beryllium Compounds	3.9e-08	1.7e-07	1.7e-07	
					Cadmium compounds	3.6e-06	1.6e-05	1.6e-05	
					Carbon Dioxide	391.92	1,717	1,717	
					Carbon Dioxide Equivalent	394.25	1,727	1,727	
					Carbon Monoxide	0.27	1.2	1.2	
					Chromium compounds	4.6e-06	2e-05	2e-05	
					Cobalt compounds	2.7e-07	1.2e-06	1.2e-06	
					Formaldehyde	0.00024	0.0011	0.0011	
					HAPs - Total	0.01	0.03	0.03	
					Hexane	0.0059	0.026	0.026	
					Lead Compounds	1.6e-06	7.2e-06	7.2e-06	
					Manganese compounds	1.2e-06	5.4e-06	5.4e-06	
					Mercury Compounds	8.5e-07	3.7e-06	3.7e-06	
					Methane	0.01	0.03	0.03	
					Naphthalene	2e-06	8.7e-06	8.7e-06	
					Nickel compounds	6.9e-06	3e-05	3e-05	
					Nitrogen Oxides	0.33	1.43	1.43	
					Nitrous Oxide	0.01	0.03	0.03	
					Particulate Matter	0.02	0.11	0.11	
					PM < 2.5 micron	0.02	0.11	0.11	
					PM < 10 micron	0.02	0.11	0.11	
					Polycyclic organic matter	2.28e-06	9.99e-06	9.99e-06	

PTE by SI

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Pollutant	Potential (lbs/hr)	Unrestricted Potential (tons/yr)	Potential Limited (tons/yr)	Actual Emissions (tons/yr)
Equipment	Boiler	EQUI 7	Null	Boiler Plant B	Selenium compounds	7.8e-08	3.4e-07	3.4e-07	
					Sulfur Dioxide	0.002	0.01	0.01	
					Toluene	1.1e-05	4.9e-05	4.9e-05	
					Volatile Organic Compounds	0.02	0.08	0	
		EQUI 8	Null	HPSB01	1,4-Dichlorobenzene (para-)	2e-05	8.6e-05	8.6e-05	
					Arsenic compounds	3.28e-06	1.44e-05	1.44e-05	
					Benzene	3.45e-05	0.000151	0.000151	
					Beryllium Compounds	1.97e-07	8.62e-07	8.62e-07	
					Cadmium compounds	1.81e-05	7.91e-05	7.91e-05	
					Carbon Dioxide	2,900	12,700	12,700	
					Carbon Dioxide Equivalent	1,980	8,672	8,672	
					Carbon Monoxide	1.38	6.04	6.04	
					Chromium compounds	2.3e-05	0.000101	0.000101	
					Cobalt compounds	1.38e-06	6.04e-06	6.04e-06	
					Formaldehyde	0.00123	0.00539	0.00539	
					HAPs - Total	0.031	0.136	0.136	
					Hexane	0.0295	0.129	0.129	
					Lead Compounds	8.2e-06	3.59e-05	3.59e-05	
					Manganese compounds	6.24e-06	2.73e-05	2.73e-05	
					Mercury Compounds	4.27e-06	1.87e-05	1.87e-05	
					Methane	0.0377	0.165	0.165	
					Naphthalene	1e-05	4.38e-05	4.38e-05	
					Nickel compounds	3.45e-05	0.000151	0.000151	
					Nitrogen Oxides	1.64	7.19	7.19	
					Nitrous Oxide	0.0361	0.158	0.158	
					Particulate Matter	0.125	0.546	0.546	
					PM < 2.5 micron	0.125	0.546	0.546	
					PM < 10 micron	0.125	0.546	0.546	
					Polycyclic organic matter	1.15e-05	5.02e-05	5.02e-05	
					Selenium compounds	3.94e-07	1.72e-06	1.72e-06	
					Sulfur Dioxide	0.00985	0.0431	0.0431	
					Toluene	5.58e-05	0.000244	0.000244	
					Volatile Organic Compounds	0.0903	0.395	0	
		EQUI 9	Null	HPSB02	1,4-Dichlorobenzene (para-)	1.97e-05	8.62e-05	8.62e-05	
					Arsenic compounds	3.28e-06	1.44e-05	1.44e-05	
					Benzene	3.45e-05	0.000151	0.000151	
					Beryllium Compounds	1.97e-07	8.62e-07	8.62e-07	
					Cadmium compounds	1.81e-05	7.91e-05	7.91e-05	
					Carbon Dioxide	1,970	8,620	8,620	
					Carbon Dioxide Equivalent	1,980	8,672	8,672	
					Carbon Monoxide	1.38	6.04	6.04	
					Chromium compounds	2.3e-05	0.000101	0.000101	
					Cobalt compounds	1.38e-06	6.04e-06	6.04e-06	
					Formaldehyde	0.00123	0.00539	0.00539	
					HAPs - Total	0.031	0.136	0.136	
					Hexane	0.0295	0.129	0.129	
					Lead Compounds	8.2e-06	3.59e-05	3.59e-05	
					Manganese compounds	6.24e-06	2.73e-05	2.73e-05	
					Mercury Compounds	4.27e-06	1.87e-05	1.87e-05	
					Methane	0.0377	0.165	0.165	
					Naphthalene	1e-05	4.38e-05	4.38e-05	
					Nickel compounds	3.45e-05	1.51e-05	1.51e-05	
					Nitrogen Oxides	1.64	7.19	7.19	
					Nitrous Oxide	0.05	0.23	0.23	
					Particulate Matter	0.125	0.546	0.546	
					PM < 2.5 micron	0.125	0.546	0.546	
					PM < 10 micron	0.125	0.546	0.546	
					Polycyclic organic matter	1.15e-05	5.02e-05	5.02e-05	
					Selenium compounds	3.94e-07	1.72e-06	1.72e-06	
					Sulfur Dioxide	0.00985	0.0431	0.0431	
					Toluene	5.58e-05	0.000244	0.000244	
					Volatile Organic Compounds	0.0903	0.395	0	
		EQUI 10	Null	Boiler 3E	1,4-Dichlorobenzene (para-)	2.9e-05	0.000127	0.000127	
					Arsenic compounds	4.8e-06	2.1e-05	2.1e-05	
					Benzene	5.1e-05	0.00022	0.00022	
					Beryllium Compounds	2.9e-07	1.3e-06	1.3e-06	
					Cadmium compounds	2.7e-05	0.00012	0.00012	
					Carbon Dioxide	2,904	12,719	12,719	
					Carbon Dioxide Equivalent	2,920	12,788	12,788	
					Carbon Monoxide	2.03	8.9	8.9	
					Chromium compounds	3.4e-05	0.00015	0.00015	
					Cobalt compounds	2e-06	8.9e-06	8.9e-06	

PTE by SI

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Pollutant	Potential (lbs/hr)	Unrestricted Potential (tons/yr)	Potential Limited (tons/yr)	Actual Emissions (tons/yr)
Equipment	Boiler	EQUI 10	Null	Boiler 3E	Formaldehyde	0.0018	0.0079	0.0079	
					HAPs - Total	0.05	0.2	0.2	
					Hexane	0.044	0.19	0.19	
					Lead Compounds	1.2e-05	5.3e-05	5.3e-05	
					Manganese compounds	9.2e-06	4e-05	4e-05	
					Mercury Compounds	6.3e-06	2.8e-05	2.8e-05	
					Methane	0.06	0.24	0.24	
					Naphthalene	1.5e-05	6.5e-05	6.5e-05	
					Nickel compounds	5.1e-05	0.00022	0.00022	
					Nitrogen Oxides	2.42	10.6	10.6	
					Nitrous Oxide	0.05	0.23	0.23	
					Particulate Matter	0.18	0.81	0.81	
					PM < 2.5 micron	0.18	0.81	0.81	
					PM < 10 micron	0.18	0.81	0.81	
					Polycyclic organic matter	1.69e-05	7.4e-05	7.4e-05	
					Selenium compounds	5.8e-07	2.5e-06	2.5e-06	
					Sulfur Dioxide	0.01	0.06	0.06	
					Toluene	8.2e-05	0.00036	0.00036	
					Volatile Organic Compounds	0.13	0.58	0	
		EQUI 11	Null	HWB01	1,4-Dichlorobenzene (para-)	4.71e-06	2.06e-05	2.06e-05	
					Arsenic compounds	7.84e-07	3.44e-06	3.44e-06	
					Benzene	8.24e-06	3.61e-05	3.61e-05	
					Beryllium Compounds	4.71e-08	2.06e-07	2.06e-07	
					Cadmium compounds	4.31e-06	1.89e-05	1.89e-05	
					Carbon Dioxide	471	2,060	2,060	
					Carbon Dioxide Equivalent	473	2,072	2,072	
					Carbon Monoxide	0.329	1.44	1.44	
					Chromium compounds	5.49e-06	2.4e-05	2.4e-05	
					Cobalt compounds	3.29e-07	1.44e-06	1.44e-06	
					Formaldehyde	0.000294	0.00129	0.00129	
					HAPs - Total	0.00741	0.0324	0.0324	
					Hexane	0.00706	0.0309	0.0309	
					Lead Compounds	1.96e-06	8.59e-06	8.59e-06	
					Manganese compounds	1.49e-06	6.53e-06	6.53e-06	
					Mercury Compounds	1.02e-06	4.47e-06	4.47e-06	
					Methane	0.00902	0.00395	0.00395	
					Naphthalene	2.39e-06	1.05e-05	1.05e-05	
					Nickel compounds	8.24e-06	3.61e-05	3.61e-05	
					Nitrogen Oxides	0.392	1.72	1.72	
					Nitrous Oxide	0.00863	0.0378	0.0378	
					Particulate Matter	0.0298	0.131	0.131	
					PM < 2.5 micron	0.0298	0.131	0.131	
					PM < 10 micron	0.0298	0.131	0.131	
					Polycyclic organic matter	2.74e-06	1.2e-05	1.2e-05	
					Selenium compounds	1.2e-07	5.2e-07	5.2e-07	
					Sulfur Dioxide	0.00235	0.0103	0.0103	
					Toluene	1.33	5.84	5.84	
					Volatile Organic Compounds	0.0216	0.0945	0	
		EQUI 12	Null	HWB02	1,4-Dichlorobenzene (para-)	4.71e-06	2.06e-05	2.06e-05	
					Arsenic compounds	7.84e-07	3.44e-06	3.44e-06	
					Benzene	8.24e-06	3.61e-05	3.61e-05	
					Beryllium Compounds	4.71e-08	2.06e-07	2.06e-07	
					Cadmium compounds	4.31e-06	1.89e-05	1.89e-05	
					Carbon Dioxide	588	2,580	2,580	
					Carbon Dioxide Equivalent	473	2,072	2,072	
					Carbon Monoxide	0.329	1.44	1.44	
					Chromium compounds	5.49e-06	2.4e-05	2.4e-05	
					Cobalt compounds	3.29e-07	1.44e-06	1.44e-06	
					Formaldehyde	0.000294	0.00129	0.00129	
					HAPs - Total	0.01	0.04	0.04	
					Hexane	0.00706	0.0309	0.0309	
					Lead Compounds	1.96e-06	8.59e-06	8.59e-06	
					Manganese compounds	1.49e-06	6.53e-06	6.53e-06	
					Mercury Compounds	1.02e-06	4.47e-06	4.47e-06	
					Methane	0.00902	0.0395	0.0395	
					Naphthalene	2.39e-06	1.05e-05	1.05e-05	
					Nickel compounds	8.24e-06	3.61e-05	3.61e-05	
					Nitrogen Oxides	0.392	1.72	1.72	
					Nitrous Oxide	0.01	0.05	0.05	
					Particulate Matter	0.0298	0.131	0.131	
					PM < 2.5 micron	0.0298	0.131	0.131	
					PM < 10 micron	0.0298	0.131	0.131	

PTE by SI

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Pollutant	Potential (lbs/hr)	Unrestricted Potential (tons/yr)	Potential Limited (tons/yr)	Actual Emissions (tons/yr)
Equipment	Boiler	EQUI 12	Null	HWB02	Polycyclic organic matter	2.74e-06	1.2e-05	1.2e-05	
					Selenium compounds	9.41e-08	4.12e-07	4.12e-07	
					Sulfur Dioxide	0.00235	0.0103	0.0103	
					Toluene	1.33e-05	5.84e-05	5.84e-05	
					Volatile Organic Compounds	0.0216	0.0945	0	
	Chemical Milling Equipment	EQUI 27	Null	Mill 1	Particulate Matter	0.495	10.4	2.17	
					PM < 2.5 micron	0.61	10.4	2.67	
					PM < 10 micron	0.61	10.4	2.67	
		EQUI 28	Null	Mill 2	Particulate Matter	0.495	10.4	2.17	
					PM < 2.5 micron	0.61	10.4	2.67	
					PM < 10 micron	0.61	10.4	2.67	
		EQUI 29	Null	Mill 3	Particulate Matter	0.495	10.4	2.17	
					PM < 2.5 micron	0.61	10.4	2.67	
					PM < 10 micron	0.61	10.4	2.67	
		EQUI 30	Null	Mill 4	Particulate Matter	0.495	10.4	2.17	
					PM < 2.5 micron	0.61	10.4	2.67	
					PM < 10 micron	0.61	10.4	2.67	
		EQUI 31	Null	Mill 5	Particulate Matter	0.495	10.4	2.17	
					PM < 2.5 micron	0.61	10.4	2.67	
					PM < 10 micron	0.61	10.4	2.67	
		EQUI 32	Null	Mill 6	Particulate Matter	0.495	10.4	2.17	
					PM < 2.5 micron	0.61	10.4	2.67	
					PM < 10 micron	0.61	10.4	2.67	
		EQUI 49	Null	Mill 7	Particulate Matter	0.495	10.4	2.17	
					PM < 2.5 micron	0.61	10.4	2.67	
					PM < 10 micron	0.61	10.4	2.67	
		EQUI 50	Null	Mill 8	Particulate Matter	0.495	10.4	2.17	
					PM < 2.5 micron	0.61	10.4	2.67	
					PM < 10 micron	0.61	10.4	2.67	
		EQUI 51	Null	Mill 9	Particulate Matter	0.495	10.4	2.17	
					PM < 2.5 micron	0.61	10.4	2.67	
					PM < 10 micron	0.61	10.4	2.67	
		EQUI 52	Null	Mill 10	Particulate Matter	0.495	10.4	2.17	
					PM < 2.5 micron	0.61	10.4	2.67	
					PM < 10 micron	0.61	10.4	2.67	
	Cleaning Equ..	EQUI 48	Null	Cleaning Operations	Volatile Organic Compounds	1.38	4.73	0	
	Mixing Equipment	EQUI 43	Null	Solution Prep Tank (Fluid Bed Processor) #3	HAPs - Total	0.461	2.02	0	
					Methanol	0.461	2.02	0	
					Particulate Matter	0.297	1.3	1.3	
					PM < 2.5 micron	0.253	1.11	1.11	
					PM < 10 micron	0.253	1.11	1.11	
					Volatile Organic Compounds	0.461	2.02	0	
		EQUI 44	Null	Solution Prep Tank (Fluid Bed Processor) #4	HAPs - Total	0.461	2.02	0	
					Methanol	0.461	2.02	0	
					Particulate Matter	0.297	1.3	1.3	
					PM < 2.5 micron	0.253	1.11	1.11	
					PM < 10 micron	0.253	1.11	1.11	
					Volatile Organic Compounds	0.461	2.02	0	
		EQUI 45	Null	Solution Prep Tank (Fluid Bed Processor) #5	HAPs - Total	0.67	2.91	0	
					Methanol	0.67	2.91	0	
					Particulate Matter	0.43	1.88	1.88	
					PM < 2.5 micron	0.36	1.6	1.6	
					PM < 10 micron	0.36	1.6	1.6	
					Volatile Organic Compounds	0.67	2.91	0	
		EQUI 46	Null	Solution Prep Tank (Fluid Bed Processor) #6	HAPs - Total	0.67	2.91	0	
					Methanol	0.67	2.91	0	
					Particulate Matter	0.43	1.88	1.88	
					PM < 2.5 micron	0.36	1.6	1.6	
					PM < 10 micron	0.36	1.6	1.6	
					Volatile Organic Compounds	0.67	2.91	0	
		EQUI 47	Null	Plant B Solution Prep Tank 1	HAPs - Total	0.07	0.31	0	
					Methanol	0.07	0.31	0	
					Particulate Matter	0.05	0.2	0.2	
					PM < 2.5 micron	0.04	0.17	0.17	
					PM < 10 micron	0.04	0.17	0.17	
					Volatile Organic Compounds	0.07	0.31	0	
		EQUI 53	Null	Solution Prep Tank (Fluid Bed Processor) #1	HAPs - Total	0.0665	0.291	0	
					Methanol	0.0665	0.291	0	
					Particulate Matter	0.0429	0.188	0.188	
					PM < 2.5 micron	0.0365	0.16	0.16	
					PM < 10 micron	0.0365	0.16	0.16	
					Volatile Organic Compounds	0.0665	0.291	0	

PTE by SI

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Pollutant	Potential (lbs/hr)	Unrestricted Potential (tons/yr)	Potential Limited (tons/yr)	Actual Emissions (tons/yr)
Equipment	Mixing Equipment	EQUI 54	Null	Solution Prep Tank (Fluid Bed Processor) #2	HAPs - Total	0.2	0.89	0	
					Methanol	0.2	0.89	0	
					Particulate Matter	0.13	0.58	0.58	
					PM < 2.5 micron	0.11	0.49	0.49	
					PM < 10 micron	0.11	0.49	0.49	
					Volatile Organic Compounds	0.2	0.89	0	
		EQUI 55	Null	Solution Prep Tank (Fluid Bed Processor) #7	HAPs - Total	0.2	0.89	0	
					Methanol	0.2	0.89	0	
					Particulate Matter	0.13	0.58	0.58	
					PM < 2.5 micron	0.11	0.49	0.49	
					PM < 10 micron	0.11	0.49	0.49	
					Volatile Organic Compounds	0.2	0.89	0	
		EQUI 56	Null	Solution Prep Tank (Fluid Bed Processor) #8	HAPs - Total	0.2	0.89	0	
					Methanol	0.2	0.89	0	
					Particulate Matter	0.13	0.58	0.58	
					PM < 2.5 micron	0.11	0.49	0.49	
					PM < 10 micron	0.11	0.49	0.49	
					Volatile Organic Compounds	0.2	0.89	0	
		EQUI 57	Null	Solution Prep Tank (Fluid Bed Processor) #9	HAPs - Total	0.2	0.89	0	
					Methanol	0.2	0.89	0	
					Particulate Matter	0.13	0.58	0.58	
					PM < 2.5 micron	0.11	0.49	0.49	
					PM < 10 micron	0.11	0.49	0.49	
					Volatile Organic Compounds	0.2	0.89	0	
		EQUI 58	Null	Solution Prep Tank (Fluid Bed Processor) #10	HAPs - Total	0.2	0.89	0	
					Methanol	0.2	0.89	0	
					Particulate Matter	0.13	0.58	0.58	
					PM < 2.5 micron	0.11	0.49	0.49	
					PM < 10 micron	0.11	0.49	0.49	
					Volatile Organic Compounds	0.2	0.89	0	
		EQUI 59	Null	Solution Prep Tank (Fluid Bed Processor) #11	HAPs - Total	0.2	0.89	0	
					Methanol	0.2	0.89	0	
					Particulate Matter	0.13	0.58	0.58	
					PM < 2.5 micron	0.11	0.49	0.49	
					PM < 10 micron	0.11	0.49	0.49	
					Volatile Organic Compounds	0.2	0.89	0	
		EQUI 60	Null	Solution Prep Tank (Fluid Bed Processor) #12	HAPs - Total	0.2	0.89	0	
					Methanol	0.2	0.89	0	
					Particulate Matter	0.13	0.58	0.58	
					PM < 2.5 micron	0.11	0.49	0.49	
					PM < 10 micron	0.11	0.49	0.49	
					Volatile Organic Compounds	0.2	0.89	0	
		EQUI 61	Null	Solution Prep Tank (Fluid Bed Processor) #13	HAPs - Total	0.2	0.89	0	
					Methanol	0.2	0.89	0	
					Particulate Matter	0.13	0.58	0.58	
					PM < 2.5 micron	0.11	0.49	0.49	
					PM < 10 micron	0.11	0.49	0.49	
					Volatile Organic Compounds	0.2	0.89	0	
		EQUI 62	Null	Solution Prep Tank (Fluid Bed Processor) #14	HAPs - Total	0.2	0.89	0	
					Methanol	0.2	0.89	0	
					Particulate Matter	0.13	0.58	0.58	
					PM < 2.5 micron	0.11	0.49	0.49	
					PM < 10 micron	0.11	0.49	0.49	
					Volatile Organic Compounds	0.2	0.89	0	
		EQUI 63	Null	Solution Prep Tank (High Shear Granulator) #1	Particulate Matter	0.07	0.29	0.29	
					PM < 2.5 micron	0.06	0.25	0.25	
					PM < 10 micron	0.06	0.25	0.25	
					Volatile Organic Compounds	0.1	0.45	0	
		EQUI 64	Null	Solution Prep Tank (High Shear Granulator) #2	Particulate Matter	0.07	0.29	0.29	
					PM < 2.5 micron	0.06	0.25	0.25	
					PM < 10 micron	0.06	0.25	0.25	
					Volatile Organic Compounds	0.1	0.45	0	
		EQUI 65	Null	Solution Prep Tank (High Shear Granulator) #3	Particulate Matter	0.07	0.29	0.29	
					PM < 2.5 micron	0.06	0.25	0.25	
					PM < 10 micron	0.06	0.25	0.25	
					Volatile Organic Compounds	0.1	0.45	0	
		EQUI 66	Null	Solution Prep Tank (High Shear Granulator) #4	Particulate Matter	0.07	0.29	0.29	
					PM < 2.5 micron	0.06	0.25	0.25	
					PM < 10 micron	0.06	0.25	0.25	
					Volatile Organic Compounds	0.1	0.45	0	
		EQUI 67	Null	Solution Prep Tank (High Shear Granulator) #5	Particulate Matter	0.07	0.29	0.29	
					PM < 2.5 micron	0.06	0.25	0.25	

PTE by SI

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Pollutant	Potential (lbs/hr)	Unrestricted Potential (tons/yr)	Potential Limited (tons/yr)	Actual Emissions (tons/yr)
Equipment	Mixing Equipment	EQUI 67	Null	Solution Prep Tank (High Shear Granulator) #5	PM < 10 micron	0.06	0.25	0.25	
					Volatile Organic Compounds	0.1	0.45	0	
		EQUI 68	Null	Solution Holding Tank (Tablet Coater) #1	Particulate Matter	0.03	0.14	0.14	
					PM < 2.5 micron	0.03	0.12	0.12	
					PM < 10 micron	0.03	0.12	0.12	
					Volatile Organic Compounds	0.05	0.22	0	
		EQUI 69	Null	Solution Holding Tank (Tablet Coater) #2	Particulate Matter	0.03	0.14	0.14	
					PM < 2.5 micron	0.03	0.12	0.12	
					PM < 10 micron	0.03	0.12	0.12	
					Volatile Organic Compounds	0.05	0.22	0	
		EQUI 70	Null	Solution Holding Tank (Tablet Coater) #3	Particulate Matter	0.03	0.14	0.14	
					PM < 2.5 micron	0.03	0.12	0.12	
					PM < 10 micron	0.03	0.12	0.12	
					Volatile Organic Compounds	0.05	0.22	0	
		EQUI 71	Null	Solution Holding Tank (Tablet Coater) #4	Particulate Matter	0.03	0.14	0.14	
					PM < 2.5 micron	0.03	0.12	0.12	
					PM < 10 micron	0.03	0.12	0.12	
					Volatile Organic Compounds	0.05	0.22	0	
		EQUI 72	Null	Solution Holding Tank (Tablet Coater) #5	Particulate Matter	0.03	0.14	0.14	
					PM < 2.5 micron	0.03	0.12	0.12	
					PM < 10 micron	0.03	0.12	0.12	
					Volatile Organic Compounds	0.05	0.22	0	
		EQUI 73	Null	High Shear Granulator #1	Particulate Matter	0.0119	0.0519	0.0519	
					PM < 2.5 micron	0.0101	0.0441	0.0441	
					PM < 10 micron	0.0101	0.0441	0.0441	
					Volatile Organic Compounds	0.19	0.82	0	
		EQUI 74	Null	High Shear Granulator #2	Particulate Matter	0.105	0.459	0.459	
					PM < 2.5 micron	0.089	0.39	0.39	
					PM < 10 micron	0.089	0.39	0.39	
					Volatile Organic Compounds	0.37	1.64	0	
		EQUI 75	Null	High Shear Granulator #3	Particulate Matter	0.24	1.06	1.06	
					PM < 2.5 micron	0.21	0.9	0.9	
					PM < 10 micron	0.21	0.9	0.9	
					Volatile Organic Compounds	0.37	1.64	0	
		EQUI 76	Null	Plant B Solution Prep Tank 4	HAPs - Total	0.07	0.31	0	
					Methanol	0.07	0.31	0	
					Particulate Matter	0.05	0.2	0.2	
					PM < 2.5 micron	0.04	0.17	0.17	
					PM < 10 micron	0.04	0.17	0.17	
					Volatile Organic Compounds	0.07	0.31	0	
		EQUI 77	Null	Plant B Solution Prep Tank 2	HAPs - Total	0.0676	0.296	0	
					Methanol	0.0676	0.296	0	
					Particulate Matter	0.05	0.2	0.2	
					PM < 2.5 micron	0.04	0.17	0.17	
					PM < 10 micron	0.04	0.17	0.17	
					Volatile Organic Compounds	0.07	0.31	0	
		EQUI 78	Null	Plant B Solution Prep Tank 5	Particulate Matter	0.00329	0.01	0.01	
					PM < 2.5 micron	0.0028	0.01	0.01	
					PM < 10 micron	0.0028	0.01	0.01	
					Volatile Organic Compounds	0.0051	0.02	0	
		EQUI 79	Null	Plant B Solution Holding Tank 5	Particulate Matter	0.02	0.09	0.09	
					PM < 2.5 micron	0.02	0.07	0.07	
					PM < 10 micron	0.02	0.07	0.07	
					Volatile Organic Compounds	0.03	0.13	0	
		EQUI 80	Null	Plant B High Shear Granulator 4	Particulate Matter	0.01	0.06	0.06	
					PM < 2.5 micron	0.01	0.05	0.05	
					PM < 10 micron	0.01	0.05	0.05	
					Volatile Organic Compounds	0.02	0.09	0	
	Spraying Equipment	EQUI 15	Null	Fluid Bed Processor 2	HAPs - Total	3.31	724.34	0	
					Methanol	3.31	724.34	0	
					Particulate Matter	0.08	33.79	0.34	
					PM < 2.5 micron	0.08	4.83	0.34	
					PM < 10 micron	0.08	4.83	0.34	
					Volatile Organic Compounds	3.31	724.34	0	
		EQUI 16	Null	Fluid Bed Processor 1	HAPs - Total	5.29	1,159	0	
					Methanol	5.29	1,159	0	
					Particulate Matter	0.1	45.05	0.45	
					PM < 2.5 micron	0.1	6.44	0.45	
					PM < 10 micron	0.1	6.44	0.45	
					Volatile Organic Compounds	5.29	1,159	0	
		EQUI 17	Null	Fluid Bed Processor 4	HAPs - Total	5.29	1,159	0	
					Methanol	5.29	1,159	0	

PTE by SI

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Pollutant	Potential (lbs/hr)	Unrestricted Potential (tons/yr)	Potential Limited (tons/yr)	Actual Emissions (tons/yr)
Equipment	Spraying Equipment	EQUI 17	Null	Fluid Bed Processor 4	Particulate Matter	0.1	45.05	0.45	
					PM < 2.5 micron	0.1	6.44	0.45	
					PM < 10 micron	0.1	6.44	0.45	
					Volatile Organic Compounds	5.29	1,159	0	
		EQUI 18	Null	Fluid Bed Processor 3	Particulate Matter	0.0514	22.5	0.225	
					PM < 2.5 micron	0.0514	3.22	0.225	
					PM < 10 micron	0.0514	3.22	0.225	
		EQUI 19	Null	Fluid Bed Processor 5	HAPs - Total	0.66	144.87	0	
					Methanol	0.66	144.87	0	
					Particulate Matter	0.05	22.53	0.23	
					PM < 2.5 micron	0.05	3.22	0.23	
					PM < 10 micron	0.05	3.22	0.23	
					Volatile Organic Compounds	0.66	144.87	0	
		EQUI 22	Null	Tablet Coater 1	Particulate Matter	0.07	30.03	0.3	
					PM < 2.5 micron	0.07	4.29	0.3	
					PM < 10 micron	0.07	4.29	0.3	
					Volatile Organic Compounds	0.66	724.34	0	
		EQUI 23	Null	Tablet Coater 2	Particulate Matter	0.07	30.03	0.3	
					PM < 2.5 micron	0.07	4.29	0.3	
					PM < 10 micron	0.07	4.29	0.3	
		EQUI 24	Null	Tablet Coater 3	Particulate Matter	0.07	30.03	0.3	
					PM < 2.5 micron	0.07	4.29	0.3	
					PM < 10 micron	0.07	4.29	0.3	
		EQUI 25	Null	Tablet Coater 4	Particulate Matter	0.07	30.03	0.3	
					PM < 2.5 micron	0.07	4.29	0.3	
					PM < 10 micron	0.07	4.29	0.3	
		EQUI 26	Null	Tablet Coater 5	Particulate Matter	0.07	30.03	0.3	
					PM < 2.5 micron	0.07	4.29	0.3	
					PM < 10 micron	0.07	4.29	0.3	
		EQUI 33	Null	Plant B Fluid Bed Processor	Particulate Matter	0.03	13.25	0.13	
					PM < 2.5 micron	0.03	1.89	0.13	
					PM < 10 micron	0.03	1.89	0.13	
					Volatile Organic Compounds	45.94	201.21	0	
		EQUI 34	Null	Plant B Tablet Coater	Particulate Matter	0.02	8.26	0.08	
					PM < 2.5 micron	0.02	1.18	0.08	
					PM < 10 micron	0.02	1.18	0.08	
					Volatile Organic Compounds	19.85	86.92	0	
Fugitive	Equipment Leaks	FUGI 1	Null	Equipment Leaks	HAPs - Total	0.43	1.87	1.87	
					Methanol	0.43	1.87	1.87	
					Volatile Organic Compounds	0.46	1.87	1.87	
Treatment	131-Thermal Oxidizer	TREA 1	Null	Regenerative Thermal Oxidizer 1	1,4-Dichlorobenzene (para-)	3.53e-05	0.000155	0.000155	
					Arsenic compounds	5.88	2.58	2.58	
					Benzene	6.18	2.71	2.71	
					Beryllium Compounds	3.53	1.55	1.55	
					Cadmium compounds	3.24	1.42	1.42	
					Carbon Dioxide	3,529	15,459	15,459	
					Carbon Dioxide Equivalent	3,548	15,542	15,542	
					Carbon Monoxide	2.470588235	10.82117647	10.82117647	
					Chromium compounds	4.12e-05	0.00018	0.00018	
					Cobalt compounds	2.47e-06	1.08e-05	1.08e-05	
					Formaldehyde	2.21	0.009661765	0.009661765	
					HAPs - Total	0.055560829	0.243356433	0.243356433	
					Hexane	0.052941176	0.231882353	0.231882353	
					Lead Compounds	0.0529	0.232	0.232	
					Manganese compounds	1.47e-05	6.44e-05	6.44e-05	
					Mercury Compounds	1.12e-05	4.9e-05	4.9e-05	
					Methane	0.067647059	0.296294118	0.296294118	
					Naphthalene	1.79	7.86	7.86	
					Nickel compounds	6.18	2.71	2.71	
					Nitrogen Oxides	2.941176471	12.88235294	12.88235294	
					Nitrous Oxide	0.064705882	0.283411765	0.283411765	
					Particulate Matter	0.223529412	0.979058824	0.979058824	
					PM < 2.5 micron	0.223529412	0.979058824	0.979058824	
					PM < 10 micron	0.223529412	0.979058824	0.979058824	
					Polycyclic organic matter	2.05	8.99446	8.99446	
					Selenium compounds	7.06	3.09	3.09	
					Sulfur Dioxide	0.017647059	0.077294118	0.077294118	
					Toluene	1	4.38	4.38	
					Volatile Organic Compounds	0.161764706	0.708529412	0	

Relationships

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Relationship	Related SI ID	% Flow	Related SI Type	Related Delta Designation	Relationship Start Date	Relationship End Date	
Equipment	Boiler	EQUI 3	Null	Boiler 2W	sends to	STRU 5	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 4	Null	Boiler 3W	sends to	STRU 6	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 5	Null	Boiler 1	sends to	STRU 7	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 6	Null	Boiler 2	sends to	STRU 8	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 7	Null	Boiler Plant B	sends to	STRU 9	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 8	Null	HPSB01	sends to	STRU 10	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 9	Null	HPSB02	sends to	STRU 11	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 10	Null	Boiler 3E	sends to	STRU 12	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 11	Null	HWB01	sends to	STRU 13	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 12	Null	HWB02	sends to	STRU 14	100	Stack/Vent	Null	1/6/2020	Null	
	Chemical Milling Equipment	EQUI 27	Null	Mill 1	is controlled in parallel by	TREA 14	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 15	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 16	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 17	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 29	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 30	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 31	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 32	25	Stack/Vent	Null	1/6/2020	Null	
		EQUI 28	Null	Mill 2	is controlled in parallel by	TREA 14	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 15	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 16	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 17	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 29	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 30	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 31	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 32	25	Stack/Vent	Null	1/6/2020	Null	
		EQUI 29	Null	Mill 3	is controlled in parallel by	TREA 14	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 15	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 16	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 17	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 29	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 30	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 31	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 32	25	Stack/Vent	Null	1/6/2020	Null	
		EQUI 30	Null	Mill 4	is controlled in parallel by	TREA 14	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 15	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 16	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 17	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 29	25	Stack/Vent	Null	1/6/2020	Null	

Relationships

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Relationship	Related SI ID	% Flow	Related SI Type	Related Delta Designation	Relationship Start Date	Relationship End Date	
Equipment	Chemical Milling Equipment	EQUI 30	Null	Mill 4	sends to	STRU 30	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 31	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 32	25	Stack/Vent	Null	1/6/2020	Null	
		EQUI 31	Null	Mill 5	is controlled in parallel by	TREA 14	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 15	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 16	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 17	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 29	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 30	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 31	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 32	25	Stack/Vent	Null	1/6/2020	Null	
		EQUI 32	Null	Mill 6	is controlled in parallel by	TREA 14	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 15	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 16	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
						TREA 17	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 29	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 30	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 31	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 32	25	Stack/Vent	Null	1/6/2020	Null	
		EQUI 49	Null	Mill 7	is controlled in parallel by	TREA 14	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
						TREA 15	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
						TREA 16	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
						TREA 17	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
					sends to	STRU 29	25	Stack/Vent	Null	2/4/2020	Null	
						STRU 30	25	Stack/Vent	Null	2/4/2020	Null	
						STRU 31	25	Stack/Vent	Null	2/4/2020	Null	
						STRU 32	25	Stack/Vent	Null	2/4/2020	Null	
		EQUI 50	Null	Mill 8	is controlled in parallel by	TREA 14	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
						TREA 15	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
						TREA 16	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
						TREA 17	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
					sends to	STRU 29	25	Stack/Vent	Null	2/4/2020	Null	
						STRU 30	25	Stack/Vent	Null	2/4/2020	Null	
						STRU 31	25	Stack/Vent	Null	2/4/2020	Null	
						STRU 32	25	Stack/Vent	Null	2/4/2020	Null	
		EQUI 51	Null	Mill 9	is controlled in parallel by	TREA 14	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
						TREA 15	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
						TREA 16	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
						TREA 17	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	

Relationships

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Relationship	Related SI ID	% Flow	Related SI Type	Related Delta Designation	Relationship Start Date	Relationship End Date	
Equipment	Chemical Milling Equipment	EQUI 51	Null	Mill 9	sends to	STRU 29	25	Stack/Vent	Null	2/4/2020	Null	
						STRU 30	25	Stack/Vent	Null	2/4/2020	Null	
						STRU 31	25	Stack/Vent	Null	2/4/2020	Null	
						STRU 32	25	Stack/Vent	Null	2/4/2020	Null	
		EQUI 52	Null	Mill 10	is controlled in parallel by	TREA 14	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
						TREA 15	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
						TREA 16	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
						TREA 17	25	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	2/4/2020	Null	
					sends to	STRU 29	25	Stack/Vent	Null	2/4/2020	Null	
						STRU 30	25	Stack/Vent	Null	2/4/2020	Null	
						STRU 31	25	Stack/Vent	Null	2/4/2020	Null	
						STRU 32	25	Stack/Vent	Null	2/4/2020	Null	
	Cleaning Equipment	EQUI 48	Null	Cleaning Operations	sends to	STRU 33	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 34	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 42	25	Stack/Vent	Null	4/30/2020	Null	
						STRU 43	25	Stack/Vent	Null	4/30/2020	Null	
	Data Acquisition System	EQUI 82	Null	Building Management System	receives from	EQUI 83	Null	Parametric Monitor	Null	5/5/2022	Null	
						EQUI 84	Null	Parametric Monitor	Null	5/5/2022	Null	
	Mixing Equipment	EQUI 43	Null	Solution Prep Tank (Fluid Bed Processor) #3	sends to	STRU 33	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 34	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 42	25	Stack/Vent	Null	4/30/2020	Null	
						STRU 43	25	Stack/Vent	Null	4/30/2020	Null	
		EQUI 44	Null	Solution Prep Tank (Fluid Bed Processor) #4	sends to	STRU 33	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 34	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 42	25	Stack/Vent	Null	4/30/2020	Null	
						STRU 43	25	Stack/Vent	Null	4/30/2020	Null	
		EQUI 45	Null	Solution Prep Tank (Fluid Bed Processor) #5	sends to	STRU 33	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 34	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 42	25	Stack/Vent	Null	4/30/2020	Null	
						STRU 43	25	Stack/Vent	Null	4/30/2020	Null	
		EQUI 46	Null	Solution Prep Tank (Fluid Bed Processor) #6	sends to	STRU 33	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 34	25	Stack/Vent	Null	1/6/2020	Null	
						STRU 42	25	Stack/Vent	Null	4/30/2020	Null	
						STRU 43	25	Stack/Vent	Null	4/30/2020	Null	
		EQUI 47	Null	Plant B Solution Prep Tank 1	sends to	STRU 35	33.34	Stack/Vent	Null	1/6/2020	Null	
						STRU 36	33.33	Stack/Vent	Null	4/30/2020	Null	
						STRU 37	33.33	Stack/Vent	Null	4/30/2020	Null	
		EQUI 73	Null	High Shear Granulator #1	sends to	STRU 56	100	Stack/Vent	Null	4/30/2020	Null	
		EQUI 74	Null	High Shear Granulator #2	sends to	STRU 57	100	Stack/Vent	Null	4/30/2020	Null	

Relationships

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Relationship	Related SI ID	% Flow	Related SI Type	Related Delta Designation	Relationship Start Date	Relationship End Date	
Equipment	Mixing Equipment	EQUI 75	Null	High Shear Granulator #3	sends to	STRU 58	100	Stack/Vent	Null	4/30/2020	Null	
		EQUI 76	Null	Plant B Solution Prep Tank 4	sends to	STRU 35	33.34	Stack/Vent	Null	4/30/2020	Null	
						STRU 36	33.33	Stack/Vent	Null	4/30/2020	Null	
						STRU 37	33.33	Stack/Vent	Null	4/30/2020	Null	
		EQUI 77	Null	Plant B Solution Prep Tank 2	sends to	STRU 35	33.34	Stack/Vent	Null	4/30/2020	Null	
						STRU 36	33.33	Stack/Vent	Null	4/30/2020	Null	
						STRU 37	33.33	Stack/Vent	Null	4/30/2020	Null	
		EQUI 78	Null	Plant B Solution Prep Tank 5	sends to	STRU 35	33.34	Stack/Vent	Null	4/30/2020	Null	
						STRU 36	33.33	Stack/Vent	Null	4/30/2020	Null	
						STRU 37	33.33	Stack/Vent	Null	4/30/2020	Null	
		EQUI 79	Null	Plant B Solution Holding Tank 5	sends to	STRU 35	33.34	Stack/Vent	Null	4/30/2020	Null	
						STRU 36	33.33	Stack/Vent	Null	4/30/2020	Null	
						STRU 37	33.33	Stack/Vent	Null	4/30/2020	Null	
		EQUI 80	Null	Plant B High Shear Granulator 4	sends to	STRU 35	33.34	Stack/Vent	Null	4/30/2020	Null	
						STRU 36	33.33	Stack/Vent	Null	4/30/2020	Null	
						STRU 37	33.33	Stack/Vent	Null	4/30/2020	Null	
	Spraying Equipment	EQUI 15	Null	Fluid Bed Processor 2	is controlled by	TREA 1	0	131-Thermal Oxidizer	Null	1/6/2020	Null	
						TREA 2	100	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 16	100	Stack/Vent	Null	1/6/2020	Null	
						STRU 17	0	Stack/Vent	Null	1/6/2020	Null	
		EQUI 16	Null	Fluid Bed Processor 1	is controlled by	TREA 1	0	131-Thermal Oxidizer	Null	1/6/2020	Null	
						TREA 3	100	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 16	100	Stack/Vent	Null	1/6/2020	Null	
						STRU 18	0	Stack/Vent	Null	1/6/2020	Null	
		EQUI 17	Null	Fluid Bed Processor 4	is controlled by	TREA 1	0	131-Thermal Oxidizer	Null	1/6/2020	Null	
						TREA 4	100	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 16	100	Stack/Vent	Null	1/6/2020	Null	
						STRU 19	0	Stack/Vent	Null	1/6/2020	Null	
		EQUI 18	Null	Fluid Bed Processor 3	is controlled by	TREA 5	100	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 20	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 19	Null	Fluid Bed Processor 5	is controlled by	TREA 1	0	131-Thermal Oxidizer	Null	1/6/2020	Null	
						TREA 6	100	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 16	100	Stack/Vent	Null	1/6/2020	Null	
						STRU 21	0	Stack/Vent	Null	1/6/2020	Null	
		EQUI 22	Null	Tablet Coater 1	is controlled by	TREA 1	0	131-Thermal Oxidizer	Null	1/6/2020	Null	
						TREA 9	100	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 16	100	Stack/Vent	Null	1/6/2020	Null	
						STRU 24	0	Stack/Vent	Null	1/6/2020	Null	
		EQUI 23	Null	Tablet Coater 2	is controlled by	TREA 10	100	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	

Relationships

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

SI Category	SI Type	Subject Item ID	Delta Designation	Description	Relationship	Related SI ID	% Flow	Related SI Type	Related Delta Designation	Relationship Start Date	Relationship End Date	
Equipment	Spraying Equipment	EQUI 23	Null	Tablet Coater 2	sends to	STRU 25	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 24	Null	Tablet Coater 3	is controlled by	TREA 11	100	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 26	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 25	Null	Tablet Coater 4	is controlled by	TREA 12	100	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 27	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 26	Null	Tablet Coater 5	is controlled by	TREA 13	100	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 28	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 33	Null	Plant B Fluid Bed Processor	is controlled by	TREA 18	100	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 36	100	Stack/Vent	Null	1/6/2020	Null	
		EQUI 34	Null	Plant B Tablet Coater	is controlled by	TREA 19	100	017-Fabric Filter - Med Temp, 180 F<T<250 F	Null	1/6/2020	Null	
					sends to	STRU 37	100	Stack/Vent	Null	1/6/2020	Null	
Treatment	017-Fabric Filter - Med Temp, 180 F<T<250 F	TREA 2	Null	Dust Collector Fluid Bed Processor 2	is controlled in series by	TREA 1	100	131-Thermal Oxidizer	Null	1/6/2020	Null	
		TREA 3	Null	Dust Collector Fluid Bed Processor 1	is controlled in series by	TREA 1	100	131-Thermal Oxidizer	Null	1/6/2020	Null	
		TREA 4	Null	Dust Collector Fluid Bed Processor 4	is controlled in series by	TREA 1	100	131-Thermal Oxidizer	Null	1/6/2020	Null	
		TREA 6	Null	Dust Collector Fluid Bed Processor 5	is controlled in series by	TREA 1	100	131-Thermal Oxidizer	Null	1/6/2020	Null	
		TREA 9	Null	Dust Collector Tablet Coater 1	is controlled in series by	TREA 1	100	131-Thermal Oxidizer	Null	1/6/2020	Null	
	131-Thermal Oxidizer	TREA 1	Null	Regenerative Thermal Oxidizer 1	is monitored by	EQUI 83	Null	Parametric Monitor	Null	5/5/2022	Null	
						EQUI 84	Null	Parametric Monitor	Null	5/5/2022	Null	
					sends to	EQUI 82	Null	Data Acquisition System	Null	5/5/2022	Null	
						STRU 16	100	Stack/Vent	Null	1/6/2020	Null	

PMs

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item ID	Delta Designation	Description	Manufacturer	Model	Serial Number	Parameter Monitored	Bypass Capability? (parametric)	Install Date (parametric)	
EQUI 83	Null	TREA 1 Combustion Chamber Temperature TE-03	Null	Null	Null	Temperature	Null	5/5/2022	
EQUI 84	Null	TREA 1 Combustion Chamber Temperature TE-04	Null	Null	Null	Temperature	Null	5/5/2022	

DAS

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item ID	Delta Designation	Description	Manufacturer	Model	Serial Number	Primary or Backup? (DASs)	Install Date (DASs)	
EQUI 82	Null	Building Management System	Johnson Controls	Metasys	NA	Primary	5/5/2022	

FUGI

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item Type	Subject Item ID	Delta Designation	Description	Install Year	Pollutants Emitted	
Equipment Leaks	FUGI 1	Null	Equipment Leaks	2020	HAPs - Total	
					Methanol	
					Volatile Organic Compounds	

Building

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item ID	Delta Designation	Description	Height	Units (height)	Length	Units (length)	Width	Units (width)	
STRU 1	Null	Original Building	48.2	feet	377.3	feet	300	feet	
STRU 2	Null	West Expansion	48.2	feet	382	feet	180.3	feet	
STRU 3	Null	East Expansion	77	feet	380	feet	284	feet	

Stack/Vents

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item ID	Delta Designation	Description	Stack Height (feet)	Stack Diameter (feet)	Stack Length (feet)	Stack Width (feet)	Stack Flow Rate (cubic ft/min)	Discharge Temperature (°F)	Flow Rate/Temp Information Source	Discharge Direction	
STRU 5	Null	Boiler 2W Stack	52	1	Null	Null	720	250	Manufacturer	Upwards with a cap on stack/vent	
STRU 6	Null	Boiler 3W Stack	55	1	Null	Null	720	250	Manufacturer	Upwards with a cap on stack/vent	
STRU 7	Null	Boiler 1 Stack	42	1	Null	Null	720	250	Manufacturer	Upwards with a cap on stack/vent	
STRU 8	Null	Boiler 2 Stack	42	1.5	Null	Null	720	250	Manufacturer	Upwards with a cap on stack/vent	
STRU 9	Null	Boiler Plant B 1 Stack	55	1	Null	Null	598	391	Manufacturer	Upwards with a cap on stack/vent	
STRU 10	Null	Boiler 1E Stack	84	2.2	Null	Null	4,428	375	Manufacturer	Upwards with a cap on stack/vent	
STRU 11	Null	Boiler 2E Stack	84	2.2	Null	Null	4,428	375	Manufacturer	Upwards with a cap on stack/vent	
STRU 12	Null	Boiler 3E Stack	84	2.2	Null	Null	4,428	375	Manufacturer	Upwards with a cap on stack/vent	
STRU 13	Null	Boiler 4E Stack	84	2.2	Null	Null	4,428	375	Manufacturer	Upwards with a cap on stack/vent	
STRU 14	Null	Boiler 5E Stack	84	2.2	Null	Null	4,428	375	Manufacturer	Upwards with a cap on stack/vent	
STRU 16	Null	Regenerative Thermal Oxidizer 1 Stack	85	5.67	Null	Null	80,000	650	Estimate	Upwards with no cap on stack/vent	
STRU 17	Null	Fluid Bed Processor 2 Stack	85	1.92	Null	Null	4,500	180	Estimate	Upwards with no cap on stack/vent	
STRU 18	Null	Fluid Bed Processor 1 Stack	85	2.17	Null	Null	6,000	180	Estimate	Upwards with no cap on stack/vent	
STRU 19	Null	Fluid Bed Processor 4 Stack	85	2.17	Null	Null	6,000	180	Estimate	Upwards with no cap on stack/vent	
STRU 20	Null	Fluid Bed Processor 3 Stack	85	2.17	Null	Null	6,000	180	Estimate	Upwards with no cap on stack/vent	
STRU 21	Null	Fluid Bed Processor 5 Stack	85	1.67	Null	Null	3,000	180	Estimate	Upwards with no cap on stack/vent	
STRU 24	Null	Tablet Coater 1 Stack	85	1.67	Null	Null	3,000	180	Estimate	Upwards with no cap on stack/vent	
STRU 25	Null	Tablet Coater 2 Stack	85	1.83	Null	Null	4,000	180	Estimate	Upwards with no cap on stack/vent	
STRU 26	Null	Tablet Coater 3 Stack	85	1.83	Null	Null	4,000	180	Estimate	Upwards with no cap on stack/vent	
STRU 27	Null	Tablet Coater 4 Stack	85	1.5	Null	Null	2,500	180	Estimate	Upwards with no cap on stack/vent	
STRU 28	Null	Tablet Coater 5 Stack	85	1.5	Null	Null	2,500	180	Estimate	Upwards with no cap on stack/vent	
STRU 29	Null	General Building Stack 1	85	1.25	Null	Null	14,000	180	Estimate	Upwards with no cap on stack/vent	
STRU 30	Null	General Building Stack 2	85	1.25	Null	Null	14,000	180	Estimate	Upwards with no cap on stack/vent	
STRU 31	Null	General Building Stack 3	85	1.25	Null	Null	14,000	180	Estimate	Upwards with no cap on stack/vent	
STRU 32	Null	General Building Stack 4	85	1.25	Null	Null	14,000	180	Estimate	Upwards with no cap on stack/vent	
STRU 33	Null	Process Vent 1	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 34	Null	Process Vent 2	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 35	Null	Plant B Process Vent	55	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 36	Null	Plant B Fluid Bed Processor Stack	55	1.25	Null	Null	1,765	180	Estimate	Upwards with no cap on stack/vent	
STRU 37	Null	Plant B Tablet Coater Stack	55	1.01	Null	Null	1,100	180	Estimate	Upwards with no cap on stack/vent	
STRU 38	Null	Exhaust Fan 1 Stack	85	4	Null	Null	40,000	68	Estimate	Upwards with no cap on stack/vent	
STRU 39	Null	Exhaust Fan 2 Stack	85	4	Null	Null	40,000	68	Estimate	Upwards with no cap on stack/vent	
STRU 40	Null	Exhaust Fan 3 Stack	85	4	Null	Null	40,000	68	Estimate	Upwards with no cap on stack/vent	
STRU 41	Null	Exhaust Fan 4 Stack	85	4	Null	Null	40,000	68	Estimate	Upwards with no cap on stack/vent	
STRU 42	Null	Process Vent 3	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 43	Null	Process Vent 4	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	

Stack/Vents

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item ID	Delta Designation	Description	Stack Height (feet)	Stack Diameter (feet)	Stack Length (feet)	Stack Width (feet)	Stack Flow Rate (cubic ft/min)	Discharge Temperature (°F)	Flow Rate/Temp Information Source	Discharge Direction	
STRU 44	Null	Process Vent 5	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 45	Null	Process Vent 6	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 46	Null	Process Vent 7	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 47	Null	Process Vent 8	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 48	Null	Process Vent 9	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 49	Null	Process Vent 10	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 50	Null	Process Vent 11	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 51	Null	Process Vent 12	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 52	Null	Process Vent 13	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 53	Null	Process Vent 14	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 54	Null	Process Vent 15	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 55	Null	Process Vent 16	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 56	Null	High Shear Granulator 1 Stack	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 57	Null	High Shear Granulator 2 Stack	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	
STRU 58	Null	High Shear Granulator 3 Stack	85	0.25	Null	Null	15	68	Estimate	Upwards with no cap on stack/vent	

Fabric Filters

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item Type	Subject Item ID	Delta Designation	Description	Manufacturer (Model #)	Installation Start Date	Pollutants Controlled	Capture Efficiency (%)	Destruction/ Collect Efficiency (%)	Subject to CAM?	Large or Other PSEU?	Efficiency Basis	Other Basis Explanation	Filter Min Pressure Drop (in. of w.c.)	Filter Max Pressure Drop (in. of w.c.)	Bag leak detector in use?	
017-Fabric Filter - Med Temp, 180 F<T<250 F	TREA 2	Null	Dust Collector Fluid Bed Processor 2	Camfil (GSC8)	5/17/2023	Particulate Matter	100	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	100	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	100	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 3	Null	Dust Collector Fluid Bed Processor 1	Camfil (GSC12)	5/17/2023	Particulate Matter	100	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	100	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	100	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 4	Null	Dust Collector Fluid Bed Processor 4	TBD (TBD)	TBD	Particulate Matter	100	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	100	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	100	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 5	Null	Dust Collector Fluid Bed Processor 3	TBD (TBD)	TBD	Particulate Matter	100	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	100	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	100	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 6	Null	Dust Collector Fluid Bed Processor 5	TBD (TBD)	TBD	Particulate Matter	100	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	100	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	100	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 9	Null	Dust Collector Tablet Coater 1	Camfil (GSC4)	5/17/2023	Particulate Matter	100	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	100	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	100	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 10	Null	Dust Collector Tablet Coater 2	TBD (TBD)	TBD	Particulate Matter	100	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	100	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	100	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 11	Null	Dust Collector Tablet Coater 3	TBD (TBD)	TBD	Particulate Matter	100	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	100	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	100	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 12	Null	Dust Collector Tablet Coater 4	TBD (TBD)	TBD	Particulate Matter	100	99	No	Null	Control Equipment Rule	Null	0.1	6	No	

Fabric Filters

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item Type	Subject Item ID	Delta Designation	Description	Manufacturer (Model #)	Installation Start Date	Pollutants Controlled	Capture Efficiency (%)	Destruction/ Collect Efficiency (%)	Subject to CAM?	Large or Other PSEU?	Efficiency Basis	Other Basis Explanation	Filter Min Pressure Drop (in. of w.c.)	Filter Max Pressure Drop (in. of w.c.)	Bag leak detector in use?	
017-Fabric Filter - Med Temp, 180 F<T<250 F	TREA 12	Null	Dust Collector Tablet Coater 4	TBD (TBD)	TBD	PM < 2.5 micron	100	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	100	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 13	Null	Dust Collector Tablet Coater 5	TBD (TBD)	TBD	Particulate Matter	100	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	100	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	100	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 14	Null	Dust Collector General Building 1	Camfil (GSC6)	11/11/2022	Particulate Matter	80	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	80	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	80	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 15	Null	Dust Collector General Building 2	Camfil (GSC20)	11/11/2022	Particulate Matter	80	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	80	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	80	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 16	Null	Dust Collector General Building 3	Camfil (GSC20)	11/11/2022	Particulate Matter	80	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	80	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	80	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 17	Null	Dust Collector General Building 4	TBD (TBD)	TBD	Particulate Matter	80	99	No	Null	Control Equipment Rule	Null	0.1	6	No	
						PM < 2.5 micron	80	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	6	No	
						PM < 10 micron	80	93	No	Null	Control Equipment Rule	Null	0.1	6	No	
	TREA 18	Null	Dust Collector Plant B Fluid Bed Processor	Camfil (GSC6)	10/5/2020	Particulate Matter	100	99	No	Null	Control Equipment Rule	Null	0.1	7	No	
						PM < 2.5 micron	100	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	7	No	
						PM < 10 micron	100	93	No	Null	Control Equipment Rule	Null	0.1	7	No	
	TREA 19	Null	Dust Collector Plant B Tablet Coater	Camfil (GSC20)	1/4/2021	Particulate Matter	100	99	No	Null	Control Equipment Rule	Null	0.1	7	No	
						PM < 2.5 micron	100	93	No	Null	Other	PM2.5 efficiency = PM10 efficiency	0.1	7	No	
						PM < 10 micron	100	93	No	Null	Control Equipment Rule	Null	0.1	7	No	

Direct Flame Afterburners

AI ID (Name): 89958 (Bora Pharmaceuticals Inc.)
Activity: IND20250001

Subject Item Type	Subject Item ID	Delta Designation	Description	Manufacturer (Model #)	Installation Start Date	Pollutants Controlled	Capture Efficiency (%)	Destruction/ Collect Efficiency (%)	Efficiency Basis	Other Basis Explanation	TO Burner Capacity (MMBTU/hr)	Inlet Temp/Outlet Temp (°F)	TO Min Combustion Temperature (°F)	TO Residence Time (secs)	
131-Thermal Oxidizer	TREA 1	Null	Regenerative Thermal Oxidizer 1	CECO-Adwest (RETOX 43.ORT095)	5/5/2022	HAPs - Single	100	98	Mfr/Vendor data	Null	30	110/650	1,550	0.5	
						HAPs - Total	100	98	Mfr/Vendor data	Null	30	110/650	1,550	0.5	
						Volatile Organic Compounds	100	98	Mfr/Vendor data	Null	30	110/650	1,550	0.5	

SI Id	Sequence	Requirement
TFAC 1	1	Permit Appendices: This permit contains appendices as listed in the permit Table of Contents. The Permittee shall comply with all requirements contained in: Appendix A: Insignificant activities and general applicable requirements; Appendix B: Production assumptions; Appendix C: 40 CFR Part 60, Subpart A - General Provisions; Appendix D: 40 CFR Part 63, Subpart A - General Provisions; Appendix E: 40 CFR Part 63, Subpart GGG - National Emission Standards for Hazardous Air Pollutants for Pharmaceuticals Production; and Appendix F: 40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. [Minn. R. 7007.0800, subp. 2(A) & (B)]
TFAC 1	2	The Permittee is authorized to construct and operate EQUIs 10, 17, 18, 19, 23, 24, 25, 26, 45, 46, 49, 50, 51, 52, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 69, 70, 71, 72, 74, 75, 76, and 78, as defined by the emissions unit information in Appendix G of this permit. This authorization is carried forward from Air Emissions Permit 05301286-101. This authorization to construct expires 5 years after issuance of Air Emissions Permit No. 05301286-104. The units must meet all applicable permit requirements. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TFAC 1	4090	This permit establishes limits on the facility to keep it a minor source under New Source Review. The Permittee cannot make any change at the source that would make the source a major source under New Source Review until a permit amendment has been issued. This includes changes that might otherwise qualify as insignificant modifications and minor or moderate amendments. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TFAC 1	4100	The Permittee must submit an annual report by the 31st of January. The report must describe the changes made at the Facility during the previous calendar year using the latest MPCA application forms. The report must include information for any new, modified, or replaced Subject Items. The report must document the VOC 12-month rolling sum calculations for the previous calendar year. The report must be submitted with the annual Compliance Certification required by this permit. As part of the Annual Report, the Permittee must verify and certify that the Facility has maintained minor source status for New Source Review. [Minn. R. 7007.0800, subp. 2(A)]
TFAC 1	4110	Equipment Labeling: The Permittee must permanently affix a unique number to each emissions unit for tracking purposes. Each number must correlate the unit to the appropriate Subject Item number used in this permit. The number can be affixed by placard, stencil, or other means. The number must be maintained so that it is readable and visible at all times from a safe distance. If equipment is added, it must be given a new unique number; numbers from replaced or removed equipment must not be reused. [Minn. R. 7007.0800, subp. 2(A)]
TFAC 1	4120	Equipment Inventory: The Permittee must maintain a written list of all emissions units and control equipment on site. The Permittee must update the list to include any replaced, modified, or new equipment prior to making the change. The list must correlate the units to the Subject Item numbers used in this permit and must include the data on GI-04, GI-05B, GI-05C, and GI-05F. The date of construction must be the date the change was made for replaced, modified, or new equipment. [Minn. R. 7007.0800, subp. 2(A)]
TFAC 1	7400	The Permittee must comply with Minn. Stat. 116.385. The Permittee may not use trichloroethylene at its permitted facility including in any manufacturing, processing, or cleaning processes, except as described in Minn. Stat. 116.385, subd. 2(b) and 4. This is a state-only requirement and is not enforceable by the U.S. Environmental Protection Agency (EPA) Administrator and citizens under the Clean Air Act. [Minn. R. 7007.0100, subp. 7(X), Minn. Stat. 116.385]

SI Id	Sequence	Requirement
TFAC 1	7420	PERMIT SHIELD: Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. This permit shall not alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance. [Minn. R. 7007.1800(A)(2)]
TFAC 1	7450	The Permittee must comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0090. Compliance must be demonstrated upon written request by the MPCA. [Minn. R. 7007.0800, subp. 2(A) & (B), Minn. R. 7009.0020-7009.0090, Minn. Stat. 116.07, subd. 4a(a)]
TFAC 1	7540	Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted. [Minn. R. 7011.0020]
TFAC 1	7550	The Permittee must at all times properly operate and maintain the facilities and systems of treatment and control and the appurtenances related to them that are installed or used by the Permittee to achieve compliance with the conditions of the permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. [Minn. R. 7007.0800, subp. 16(J)]
TFAC 1	7560	Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment and practices, and the records kept to demonstrate plan implementation. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 16(J)]
TFAC 1	7570	Operation Changes: In any shutdown, breakdown, or deviation the Permittee must immediately or as soon as possible considering plant and personnel safety take all practical steps to modify operations to reduce the emission of any regulated air pollutant. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment are permitted to operate. [Minn. R. 7019.1000, subp. 4]
TFAC 1	7580	Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150. [Minn. R. 7011.0150]
TFAC 1	7590	Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the U.S. Environmental Protection Agency (EPA) Administrator and citizens under the Clean Air Act. [Minn. R. 7030.0010-7030.0080]
TFAC 1	7600	Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A). [Minn. R. 7007.0800, subp. 9(A)]
TFAC 1	7610	The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16. [Minn. R. 7007.0800, subp. 16]
TFAC 1	7620	Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in this permit. [Minn. R. ch. 7017]
TFAC 1	7630	Performance Test Notifications and Submittals: Performance Test Notification and Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due seven days before each Performance Test Performance Test Report: due 45 days after each Performance Test The Notification, Test Plan, and Test Report must be submitted in a format specified by the commissioner. [Minn. R. 7017.2017, Minn. R. 7017.2030, subps. 1-4, Minn. R. 7017.2035, subps. 1-2]

SI Id	Sequence	Requirement
TFAC 1	7640	Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as stated in the MPCA's follow up compliance letter granting preliminary approval. Preliminary approval is based on formal review of a subsequent performance test on the same unit as specified by Minn. R. 7017.2025, subp. 3. The limit is final upon issuance of a permit amendment incorporating the change. [Minn. R. 7017.2025, subp. 3]
TFAC 1	7650	Monitoring Equipment Calibration - The Permittee shall either: 1. Calibrate or replace required monitoring equipment every 12 months; or 2. Calibrate at the frequency stated in the manufacturer's specifications. For each monitor, the Permittee shall maintain a record of all calibrations, including the date conducted, and any corrective action that resulted. The Permittee shall include the calibration frequencies, procedures, and manufacturer's specifications (if applicable) in the Operations and Maintenance Plan. Any requirements applying to continuous emission monitors are listed separately in this permit. [Minn. R. 7007.0800, subp. 4(D)]
TFAC 1	7660	Operation of Monitoring Equipment: Unless noted elsewhere in this permit, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system. [Minn. R. 7007.0800, subp. 4(D)]
TFAC 1	7670	Recordkeeping: Retain all records at the stationary source, unless otherwise specified within this permit, for five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A). [Minn. R. 7007.0800, subp. 5(C)]
TFAC 1	7680	Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350, subp. 2), including records of the emissions resulting from those changes. [Minn. R. 7007.0800, subp. 5(B)]
TFAC 1	7690	If the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. For expiring permits, these records shall be kept for a period of five years from the date the change was made or until permit reissuance, whichever is longer. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format. [Minn. R. 7007.1200, subp. 4]
TFAC 1	7770	Shutdown Notifications: Notify the commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the Permittee does not have advance knowledge of the shutdown, the Permittee must notify the commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in items A, B, and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator must inform the commissioner of the cause of the shutdown and the estimated duration. The owner or operator must notify the commissioner when the shutdown is over. [Minn. R. 7019.1000, subp. 3]
TFAC 1	7780	Breakdown Notifications: Notify the commissioner within 24 hours of a breakdown of more than one hour of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in items A, B, and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the Permittee must inform the commissioner of the cause of the breakdown and the estimated duration. The Permittee must notify the commissioner when the breakdown is over. [Minn. R. 7019.1000, subp. 2]

SI Id	Sequence	Requirement
TFAC 1	7790	Notification of Deviations Endangering Human Health or the Environment: Immediately after discovery of the deviation or immediately after when the deviation reasonably should have been discovered, notify the commissioner either orally or by e-mail, or telephone the state duty officer at 800-422-0798 or 651-649-5451, of any deviation from permit conditions that could endanger human health or the environment. [Minn. R. 7019.1000, subp. 1]
TFAC 1	7800	Notification of Deviations Endangering Human Health or the Environment Report: Within two working days of discovery, notify the commissioner in writing of any deviation from permit conditions that could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation. [Minn. R. 7019.1000, subp. 1]
TFAC 1	7810	The Permittee must submit a semiannual deviations report : Due semiannually, by the 30th of January and July. The first semiannual report submitted by the Permittee must cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. Submit this on form DRF-2 (Deviation Reporting Form). If no deviations have occurred, submit the signed report certifying that there were no deviations. [Minn. R. 7007.0800, subp. 6(B)(2)]
TFAC 1	7830	Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed. Upon adoption of a new or amended federal applicable requirement, and if there are three or more years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150 - 7007.1500]
TFAC 1	7840	Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H). Performance testing deadlines from the General Provisions of 40 CFR pt. 60 and pt. 63 are examples of deadlines for which the MPCA does not have authority to grant extensions and therefore do not meet the requirements of Minn. R. 7007.1400, subp. 1(H). [Minn. R. 7007.1400, subp. 1(H)]
TFAC 1	7860	The Permittee must submit a compliance certification : Due annually, by the 31st of January (for the previous calendar year). Submit this on form CR-04 (Annual Compliance Certification Report). This report covers all deviations experienced during the calendar year. If no deviations have occurred, submit the signed report certifying that there were no deviations. [Minn. R. 7007.0800, subp. 6(D)]
TFAC 1	7870	Within 15 days of a request from the Commissioner, the Permittee must provide a complete summary of all performance tests required at the facility including the subject item, pollutant, most recent test date (if applicable), and the date of the next test in an approved format. [Minn. R. 7007.0800, subp. 16(L)]
TFAC 1	7890	The Permittee shall submit an application for permit reissuance : Due 180 calendar days before Permit Expiration Date. [Minn. R. 7007.0400, subp. 2]
TFAC 1	7900	Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. Submit in a format specified by the Commissioner. [Minn. R. 7019.3000-7019.3100]
TFAC 1	7910	Emission Fees: due 30 days after receipt of an MPCA bill. [Minn. R. 7002.0005-7002.0085]

SI Id	Sequence	Requirement
COMG 2	4330	The Permittee must limit emissions of Volatile Organic Compounds <= 90.0 tons per year 12-month rolling sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit. All VOC-emitting equipment at the Facility is subject to this limit except for the following: FUGI 1 and the six hot water boilers listed as insignificant activities in Appendix A of this permit. If the Permittee replaces any existing VOC-emitting equipment, adds new VOC-emitting equipment, or modifies the existing equipment, such equipment is subject to this permit limit as well as all of the requirements of COMG 2. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. A permit amendment will still be needed regardless of the emissions increase if the change will be subject to a new applicable requirement or requires revisions to the limits or monitoring and recordkeeping in this permit. VOC contents for each VOC-containing material must be determined as described under the Material Content requirement in COMG 2. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
COMG 2	4335	VOC-containing materials: Daily Recordkeeping. On each day of operation, the Permittee must calculate, record, and maintain the total quantity of each coating and other VOC, solids, and HAP-containing material used at the facility. This must be based on written usage logs. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
COMG 2	4336	Natural Gas: Daily Recordkeeping. On each day of operation, the Permittee must calculate, record, and maintain a record of the total million standard cubic feet (mmscf) of natural gas used. This must be based on fuel usage meter readings. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
COMG 2	4340	Volatile Organic Compounds: Monthly Recordkeeping -- VOC Emissions. By the 15th of the month, the Permittee must calculate and record the following: 1) The total usage of each VOC-containing material for the previous calendar month using the daily usage records. This record must also include the VOC and solids contents of each material as determined by the Material Content requirement of this permit; 2) The total amount of natural gas combusted in the previous month; 3) The VOC emissions for the previous month using the formulas specified in this permit; and 4) The 12-month rolling sum VOC emissions for the previous 12-month period by summing the monthly VOC emissions data for the previous 12 months. [Minn. R. 7007.0800, subps. 4-5]

SI Id	Sequence	Requirement
COMG 2	4350	Volatile Organic Compounds: Volatile Organic Compounds: Monthly Calculation -- VOC Emissions. The Permittee must calculate VOC emissions using the following equations: VOC (tons/month) = Vcon + Vunc + Vcomb Vcon = ((A1 x B1) + (A2 x B2) + (A3 x B3) + ...) x (1-CE) Vunc = (C1 x D1) + (C2 x D2) + (C3 x D3) + ... Vcomb = F x EF / 2000 where, Vcon = VOC emissions from usage of VOC-containing materials in units controlled by TREA 1, in tons/month; A# = amount of each VOC-containing material used in units controlled by TREA 1, in tons/month; B# = weight percent VOC in A#, as a fraction; CE = control efficiency, CE = 0.98 for units controlled by TREA 1; Vunc = VOC emissions from usage of each VOC-containing materials in COMG 2 units that are not controlled by TREA 1, C# = amount of each VOC-containing material used in COMG 2 units that do not vent to TREA 1, in tons/month, D# = weight percent of VOC in C#, as a fraction; Vcomb = VOC emissions from natural gas combustion, in tons/month; F = amount of natural gas combusted in mmscf/month; and EF = VOC emission factor, 5.5 lb VOC/mmscf. [Minn. R. 7007.0800, subps. 4-5]
COMG 2	7010	Material Content. VOC, HAPs, and Solids (PM, PM<10 microns, and PM<2.5 microns) contents in solvent, solution, tablet coating, and other VOC-containing materials must be determined by the Safety Data Sheet (SDS) or the Material Safety Data Sheet (MSDS) provided by the supplier for each material used. If a material content range is given on the SDS or the MSDS, the highest number in the range must be used in all compliance calculations. If there is information provided in the Regulatory Section of the SDS, the highest number in the range of that section may be used. Other alternative methods approved by the MPCA may be used to determine the VOC, HAPs, and solids contents. The Commissioner reserves the right to require the Permittee to determine the VOC, HAP, and solids contents of any material, according to EPA or ASTM reference methods. If an EPA or ASTM reference method is used for material content determination, the data obtained must supersede the SDS or the MSDS. [Minn. R. 7007.0800, subps. 4-5]
COMG 2	7030	Process Rate: The Permittee assumed certain worst-case process rates when determining the short term potential to emit of COMG 2 units. The worst-case process rates are based on minimum batch times, maximum VOC usage rates, and dry material throughput rates. These assumptions are listed in Appendix B of this permit. Increasing the process rate, decreasing the batch process time, increasing the VOC usage rate, and increasing the dry material throughput rate is considered a change in method of operation that must be evaluated under Minn. R. 7007.1200, subp. 3 to determine if a permit amendment or notification is required under Minn. R. 7007.1150. [Minn. R. 7005.0100, subp. 35a]
COMG 3	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
COMG 3	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
COMG 4	12249	Except as provided in the next paragraph, for uncontrolled HAP emissions from the sum of all process vents within a process, the Permittee shall reduce HAPs - Total >= 98 percent by weight or control HAP emissions in accordance with any of the requirements of 40 CFR 63.1254(a)(1)(ii)(A) through (D). The Permittee shall demonstrate continuous compliance in accordance with the monitoring requirements described in 40 CFR 63.1258. The actual HAP emissions from the sum of all process vents for which the owner or operator is not complying with the above paragraph are limited to 900 kg in any 365-day period. [40 CFR 63.1254(b), Minn. R. 7011.7580]

SI Id	Sequence	Requirement
COMG 4	12252	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. GGG, as follows: 40 CFR 63.1250(a)-(d); 40 CFR 63.1250(f)(2); 40 CFR 63.1250(g); 40 CFR 63.1250(i); 40 CFR 63.1251; 40 CFR 63.1252(a)-(b); 40 CFR 63.1252(d)-(e); 40 CFR 63.1252(h); 40 CFR 63.1254(b); 40 CFR 63.1255(a)-(h); 40 CFR 63.1256(a)(1)(i); 40 CFR 63.1257(a)(i); 40 CFR 63.1257(b); 40 CFR 63.1257(b)(8); 40 CFR 63.1257(d); 40 CFR 63.1257(d)(1)(ii); 40 CFR 63.1257(d)(2); 40 CFR 63.1257(d)(3)(ii); 40 CFR 63.1257(e)(1)(iii); 40 CFR 63.1257(h);
		40 CFR 63.1258(a); 40 CFR 63.1258(b); 40 CFR 63.1258(b)(1)(vii); 40 CFR 63.1258(b)(1)(xi); 40 CFR 63.1258(b)(2); 40 CFR 63.1258(b)(3)(ii)-(iii); 40 CFR 63.1258(c)-(d); 40 CFR 63.1258(f); 40 CFR 63.1258(h)-(i); 40 CFR 63.1259; 40 CFR 63.1260; 40 CFR 63.1261; 40 CFR pt. 63, subp. GGG, Table 1; and 40 CFR pt. 63, subp. GGG, Table 4, for all control devices and for thermal incinerator. A copy of 40 CFR pt. 63, subp. GGG is included in Appendix E. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than 3 years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 63, subp. GGG, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.7580]
COMG 4	35780	Reporting: The Permittee shall prepare reports in accordance with 40 CFR 63.1260(g)(1)-(2) and submit them to the administrator every six months. [40 CFR 63.1260(g)(1)-(3), Minn. R. 7011.7580]

SI Id	Sequence	Requirement
COMG 4	35781	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. A as follows: 40 CFR 63.1(a); 40 CFR 63.1(b)(1); 40 CFR 63.1(b)(3); 40 CFR 63.1(c)(1); 40 CFR 63.1(c)(6); 40 CFR 63.1(e); 40 CFR 63.2; 40 CFR 63.3; 40 CFR 63.4; 40 CFR 63.5(a)-(b); 40 CFR 63.5(d)-(f); 40 CFR 63.6(a); 40 CFR 63.6(b)(3)-(5); 40 CFR 63.6(e)(1)(iii); 40 CFR 63.6(f)(2)-(3); 40 CFR 63.6(i)(8)-(9); 40 CFR 63.6(i)(11); 40 CFR 63.6(j); 40 CFR 63.7(a)(2); 40 CFR 63.7(a)(2)(ix);
		40 CFR 63.7(a)(3); 40 CFR 63.7(b)-(h); 40 CFR 63.8(b); 40 CFR 63.9(b)(4)-(5); 40 CFR 63.9(e); 40 CFR 63.9(h)-(k); 40 CFR 63.10(a)(5)-(7); 40 CFR 63.10(b)(1); 40 CFR 63.10(b)(3); 40 CFR 63.10(d)(1)-(2); 40 CFR 63.10(f); 40 CFR 63.11(a); 40 CFR 63.11(c)-(e); 40 CFR 63.12; 40 CFR 63.13; 40 CFR 63.14; and 40 CFR 63.15. A copy of 40 CFR pt. 63, subp. A is included in Appendix D. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR 63.1250(c), 40 CFR pt. 63, subp. A, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(B), Minn. R. 7011.7050, Minn. R. 7011.7580, Minn. R. 7017.1010 & 7017.2015, subp. 3, Minn. R. 7019.0100]
COMG 6	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
COMG 6	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 3	3570	Filterable Particulate Matter <= 0.40 pounds per million Btu heat input. The potential to emit from the unit is 0.007 lb/MMBtu due to equipment design and allowable fuels. [Minn. R. 7011.0515, subp. 1]

SI Id	Sequence	Requirement
EQUI 3	3580	Opacity <= 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. [Minn. R. 7011.0515, subp. 2]
EQUI 3	3632	Fuel type: Natural gas only, by design. [Minn. R. 7005.0100, subp. 35a]
EQUI 3	3637	The Permittee shall keep records of fuel purchases showing fuel types. [Minn. R. 7007.0800, subp. 5]
EQUI 3	4930	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. DDDDD, as follows: 40 CFR 63.7480; 40 CFR 63.7485; 40 CFR 63.7490(a)(2); 40 CFR 63.7490(b); 40 CFR 63.7495(a); 40 CFR 63.7495(d); 40 CFR 63.7499; 40 CFR 63.7500(a); 40 CFR 63.7500(a)(1); 40 CFR 63.7500(a)(3); 40 CFR 63.7500(e), for units less than or equal to 5 MMBtu; 40 CFR 63.7505(a); 40 CFR 63.7515(d), five year tune-up frequency; 40 CFR 63.7515(g); 40 CFR 63.7540(a); 40 CFR 63.7540(a)(12), for units less than or equal to 5 MMBtu; 40 CFR 63.7540(a)(13); 40 CFR 63.7545(a);
		40 CFR 63.7545(f); 40 CFR 63.7545(h); 40 CFR 63.7550(a); 40 CFR 63.7550(b), five year tune-up frequency; 40 CFR 63.7550(c) 40 CFR 63.7550(c)(1); 40 CFR 63.7550(c)(5)(i)-(iii); 40 CFR 63.7550(c)(5)(xiv); 40 CFR 63.7550(c)(5)(xvii); 40 CFR 63.7550(h)(3); 40 CFR 63.7555(a); 40 CFR 63.7555(a)(1); 40 CFR 63.7555(h); 40 CFR 63.7560; 40 CFR 63.7565; 40 CFR 63.7570; 40 CFR 63.7575; 40 CFR pt. 63, subp. DDDDD, Table 3, item 1; 40 CFR pt. 63, subp. DDDDD, Table 9. item 1(a); and 40 CFR pt. 63, subp. DDDDD, Table 10. A copy of 40 CFR pt. 63, subp. DDDDD is included in Appendix F. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than 3 years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 63, subp. DDDDD, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.7050]

SI Id	Sequence	Requirement
EQUI 3	4940	Compliance Report: The Permittee must submit a 5-year compliance report: Due January 31, 2030, and every 60 months thereafter. Each compliance report must cover the applicable 5-year period from January 1 to December 31. Five-year compliance reports must be postmarked or submitted no later than January 31. The Permittee must submit the Compliance Report electronically to the EPA via CEDRI using the appropriate electronic report in CEDRI for 40 CFR pt. 63, subp. DDDDD. [40 CFR 63.7550(a)-(b), 40 CFR 63.7550(h)(3), 40 CFR pt. 63, subp. DDDDD(Table 9), Minn. R. 7011.7050]
EQUI 3	35780	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. A as follows: 40 CFR 63.1(a); 40 CFR 63.1(b)(1); 40 CFR 63.1(b)(3); 40 CFR 63.1(c)(1)-(2); 40 CFR 63.1(c)(5); 40 CFR 63.1(e); 40 CFR 63.2; 40 CFR 63.3; 40 CFR 63.4(a)-(c); 40 CFR 63.5(a)-(b); 40 CFR 63.5(d)-(f); 40 CFR 63.6(a)(1)-(2); 40 CFR 63.6(b)(1)-(5); 40 CFR 63.6(b)(7); 40 CFR 63.8(b)(1)-(2); 40 CFR 63.8(f); 40 CFR 63.9(b)(1)-(2); 40 CFR 63.9(b)(4)-(5);
		40 CFR 63.9(c); 40 CFR 63.9(h)-(j); 40 CFR 63.10(a)(5)-(7); 40 CFR 63.10(b)(1); 40 CFR 63.10(b)(2)(i)-(v); 40 CFR 63.10(b)(2)(ix); 40 CFR 63.10(b)(2)(xiv); 40 CFR 63.10(d)(1); 40 CFR 63.10(d)(5); 40 CFR 63.10(f); 40 CFR 63.12; 40 CFR 63.13; 40 CFR 63.14; and 40 CFR 63.15. A copy of 40 CFR pt. 63, subp. A is included in Appendix D. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR 63.7565, 40 CFR pt. 63, subp. A, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(B), Minn. R. 7011.7050, Minn. R. 7017.1010 & 7017.2015, subp. 3, Minn. R. 7019.0100]
EQUI 4	3570	Filterable Particulate Matter <= 0.40 pounds per million Btu heat input. The potential to emit from the unit is 0.007 lb/MMBtu due to equipment design and allowable fuels. [Minn. R. 7011.0515, subp. 1]
EQUI 4	3580	Opacity <= 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. [Minn. R. 7011.0515, subp. 2]
EQUI 4	3632	Fuel type: Natural gas only, by design. [Minn. R. 7005.0100, subp. 35a]

SI Id	Sequence	Requirement
EQUI 4	3637	The Permittee shall keep records of fuel purchases showing fuel types. [Minn. R. 7007.0800, subp. 5]
EQUI 4	4930	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. DDDDD, as follows: 40 CFR 63.7480; 40 CFR 63.7485; 40 CFR 63.7490(a)(2); 40 CFR 63.7490(b); 40 CFR 63.7495(a); 40 CFR 63.7495(d); 40 CFR 63.7499; 40 CFR 63.7500(a); 40 CFR 63.7500(a)(1); 40 CFR 63.7500(a)(3); 40 CFR 63.7500(e), for units less than or equal to 5 MMBtu; 40 CFR 63.7505(a); 40 CFR 63.7515(d), five year tune-up frequency; 40 CFR 63.7515(g); 40 CFR 63.7540(a); 40 CFR 63.7540(a)(12), for units less than or equal to 5 MMBtu; 40 CFR 63.7540(a)(13); 40 CFR 63.7545(a); 40 CFR 63.7545(f); 40 CFR 63.7545(h); 40 CFR 63.7550(a); 40 CFR 63.7550(b), five year tune-up frequency; 40 CFR 63.7550(c) 40 CFR 63.7550(c)(1); 40 CFR 63.7550(c)(5)(i)-(iii); 40 CFR 63.7550(c)(5)(xiv); 40 CFR 63.7550(c)(5)(xvii); 40 CFR 63.7550(h)(3); 40 CFR 63.7555(a); 40 CFR 63.7555(a)(1); 40 CFR 63.7555(h); 40 CFR 63.7560; 40 CFR 63.7565; 40 CFR 63.7570; 40 CFR 63.7575; 40 CFR pt. 63, subp. DDDDD, Table 3, item 1; 40 CFR pt. 63, subp. DDDDD, Table 9. item 1(a); and 40 CFR pt. 63, subp. DDDDD, Table 10. A copy of 40 CFR pt. 63, subp. DDDDD is included in Appendix F. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than 3 years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 63, subp. DDDDD, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.7050]

SI Id	Sequence	Requirement
EQUI 4	4940	Compliance Report: The Permittee must submit a 5-year compliance report: Due January 31, 2030, and every 60 months thereafter. Each compliance report must cover the applicable 5-year period from January 1 to December 31. Five-year compliance reports must be postmarked or submitted no later than January 31. The Permittee must submit the Compliance Report electronically to the EPA via CEDRI using the appropriate electronic report in CEDRI for 40 CFR pt. 63, subp. DDDDD. [40 CFR 63.7550(a)-(b), 40 CFR 63.7550(h)(3), 40 CFR pt. 63, subp. DDDDD(Table 9), Minn. R. 7011.7050]
EQUI 4	35780	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. A as follows: 40 CFR 63.1(a); 40 CFR 63.1(b)(1); 40 CFR 63.1(b)(3); 40 CFR 63.1(c)(1)-(2); 40 CFR 63.1(c)(5); 40 CFR 63.1(e); 40 CFR 63.2; 40 CFR 63.3; 40 CFR 63.4(a)-(c); 40 CFR 63.5(a)-(b); 40 CFR 63.5(d)-(f); 40 CFR 63.6(a)(1)-(2); 40 CFR 63.6(b)(1)-(5); 40 CFR 63.6(b)(7); 40 CFR 63.8(b)(1)-(2); 40 CFR 63.8(f); 40 CFR 63.9(b)(1)-(2); 40 CFR 63.9(b)(4)-(5);
		40 CFR 63.9(c); 40 CFR 63.9(h)-(j); 40 CFR 63.10(a)(5)-(7); 40 CFR 63.10(b)(1); 40 CFR 63.10(b)(2)(i)-(v); 40 CFR 63.10(b)(2)(ix); 40 CFR 63.10(b)(2)(xiv); 40 CFR 63.10(d)(1); 40 CFR 63.10(d)(5); 40 CFR 63.10(f); 40 CFR 63.12; 40 CFR 63.13; 40 CFR 63.14; and 40 CFR 63.15. A copy of 40 CFR pt. 63, subp. A is included in Appendix D. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR 63.7565, 40 CFR pt. 63, subp. A, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(B), Minn. R. 7011.7050, Minn. R. 7017.1010 & 7017.2015, subp. 3, Minn. R. 7019.0100]
EQUI 5	3570	Filterable Particulate Matter <= 0.40 pounds per million Btu heat input. The potential to emit from the unit is 0.007 lb/MMBtu due to equipment design and allowable fuels. [Minn. R. 7011.0515, subp. 1]
EQUI 5	3580	Opacity <= 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. [Minn. R. 7011.0515, subp. 2]
EQUI 5	3632	Fuel type: Natural gas only, by design. [Minn. R. 7005.0100, subp. 35a]

SI Id	Sequence	Requirement
EQUI 5	3637	The Permittee shall keep records of fuel purchases showing fuel types. [Minn. R. 7007.0800, subp. 5]
EQUI 5	21050	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. DDDDD as follows: 40 CFR 63.7480; 40 CFR 63.7485; 40 CFR 63.7490(a)(1); 40 CFR 63.7490(d); 40 CFR 63.7495(b); 40 CFR 63.7495(d); 40 CFR 63.7499(l); 40 CFR 63.7500(a); 40 CFR 63.7500(a)(1); 40 CFR 63.7500(a)(3); 40 CFR 63.7500(b); 40 CFR 63.7500(e), for units less than or equal to 5 MMBtu/hr; 40 CFR 63.7505(a); 40 CFR 63.7515(d), five year tune-up frequency; 40 CFR 63.7540(a); 40 CFR 63.7540(a)(12), for units less than or equal to 5 MMBtu/hr; 40 CFR 63.7540(a)(13); 40 CFR 63.7540(b); 40 CFR 63.7545(a);
EQUI 5	21060	40 CFR 63.7545(f); 40 CFR 63.7545(h); 40 CFR 63.7550(a); 40 CFR 63.7550(b), five year tune-up frequency; 40 CFR 63.7550(c); 40 CFR 63.7550(c)(1); 40 CFR 63.7550(c)(5)(i)-(iii), (xiv) and (xvii); 40 CFR 63.7550(h)(3); 40 CFR 63.7555(a)(1); 40 CFR 63.7555(h); 40 CFR 63.7560; 40 CFR 63.7565; 40 CFR 63.7570; 40 CFR 63.7575; 40 CFR pt. 63, subp. DDDDD, Table 3, item 1; 40 CFR pt. 63, subp. DDDDD, Table 9; and 40 CFR pt. 63, subp. DDDDD, Table 10. A copy of 40 CFR pt. 63, subp. DDDDD is included in Appendix F. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 63, subp. DDDDD, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.7050]
EQUI 5	21060	Compliance Report: The Permittee must submit a 5-year compliance report: Due January 31, 2030, and every 60 months thereafter. Each compliance report must cover the applicable 5-year period from January 1 to December 31. Five-year compliance reports must be postmarked or submitted no later than January 31. The Permittee must submit the Compliance Report electronically to the EPA via CEDRI using the appropriate electronic report in CEDRI for 40 CFR pt. 63, subp. DDDDD. [40 CFR 63.7550(a)-(b), 40 CFR 63.7550(h)(3), 40 CFR pt. 63, subp. DDDDD(Table 9), Minn. R. 7011.7050]

SI Id	Sequence	Requirement
EQUI 5	35780	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. A as follows: 40 CFR 63.1(a); 40 CFR 63.1(b)(1); 40 CFR 63.1(b)(3); 40 CFR 63.1(c)(1)-(2); 40 CFR 63.1(c)(5); 40 CFR 63.1(e); 40 CFR 63.2; 40 CFR 63.3; 40 CFR 63.4(a)-(c); 40 CFR 63.5(a)-(b); 40 CFR 63.5(d)-(f); 40 CFR 63.6(a)(1)-(2); 40 CFR 63.6(b)(1)-(5); 40 CFR 63.6(b)(7); 40 CFR 63.8(b)(1)-(2); 40 CFR 63.8(f); 40 CFR 63.9(b)(1)-(2); 40 CFR 63.9(b)(4)-(5);
		40 CFR 63.9(c); 40 CFR 63.9(h)-(j); 40 CFR 63.10(a)(5)-(7); 40 CFR 63.10(b)(1); 40 CFR 63.10(b)(2)(i)-(v); 40 CFR 63.10(b)(2)(ix); 40 CFR 63.10(b)(2)(xiv); 40 CFR 63.10(d)(1); 40 CFR 63.10(d)(5); 40 CFR 63.10(f); 40 CFR 63.12; 40 CFR 63.13; 40 CFR 63.14; and 40 CFR 63.15. A copy of 40 CFR pt. 63, subp. A is included in Appendix D. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR 63.7565, 40 CFR pt. 63, subp. A, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(B), Minn. R. 7011.7050, Minn. R. 7017.1010 & 7017.2015, subp. 3, Minn. R. 7019.0100]
EQUI 6	3570	Filterable Particulate Matter <= 0.40 pounds per million Btu heat input. The potential to emit from the unit is 0.007 lb/MMBtu due to equipment design and allowable fuels. [Minn. R. 7011.0515, subp. 1]
EQUI 6	3580	Opacity <= 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. [Minn. R. 7011.0515, subp. 2]
EQUI 6	3632	Fuel type: Natural gas only, by design. [Minn. R. 7005.0100, subp. 35a]
EQUI 6	3637	The Permittee shall keep records of fuel purchases showing fuel types. [Minn. R. 7007.0800, subp. 5]

SI Id	Sequence	Requirement
EQUI 6	21050	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. DDDDD as follows: 40 CFR 63.7480; 40 CFR 63.7485; 40 CFR 63.7490(a)(1); 40 CFR 63.7490(d); 40 CFR 63.7495(b); 40 CFR 63.7495(d); 40 CFR 63.7499(l); 40 CFR 63.7500(a); 40 CFR 63.7500(a)(1); 40 CFR 63.7500(a)(3); 40 CFR 63.7500(b); 40 CFR 63.7500(e), for units less than or equal to 5 MMBtu/hr; 40 CFR 63.7505(a); 40 CFR 63.7515(d), five year tune-up frequency; 40 CFR 63.7540(a); 40 CFR 63.7540(a)(12), for units less than or equal to 5 MMBtu/hr; 40 CFR 63.7540(a)(13); 40 CFR 63.7540(b);
		40 CFR 63.7545(a); 40 CFR 63.7545(f); 40 CFR 63.7545(h); 40 CFR 63.7550(a); 40 CFR 63.7550(b), five year tune-up frequency; 40 CFR 63.7550(c); 40 CFR 63.7550(c)(1); 40 CFR 63.7550(c)(5)(i)-(iii), (xiv) and (xvii); 40 CFR 63.7550(h)(3); 40 CFR 63.7555(a)(1); 40 CFR 63.7555(h); 40 CFR 63.7560; 40 CFR 63.7565; 40 CFR 63.7570; 40 CFR 63.7575; 40 CFR pt. 63, subp. DDDDD, Table 3, item 1; 40 CFR pt. 63, subp. DDDDD, Table 9; and 40 CFR pt. 63, subp. DDDDD, Table 10. A copy of 40 CFR pt. 63, subp. DDDDD is included in Appendix F. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 63, subp. DDDDD, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.7050]
EQUI 6	21060	Compliance Report: The Permittee must submit a 5-year compliance report: Due January 31, 2030, and every 60 months thereafter. Each compliance report must cover the applicable 5-year period from January 1 to December 31. Five-year compliance reports must be postmarked or submitted no later than January 31. The Permittee must submit the Compliance Report electronically to the EPA via CEDRI using the appropriate electronic report in CEDRI for 40 CFR pt. 63, subp. DDDDD. [40 CFR 63.7550(a)-(b), 40 CFR 63.7550(h)(3), 40 CFR pt. 63, subp. DDDDD(Table 9), Minn. R. 7011.7050]

SI Id	Sequence	Requirement
EQUI 6	35780	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. A as follows: 40 CFR 63.1(a); 40 CFR 63.1(b)(1); 40 CFR 63.1(b)(3); 40 CFR 63.1(c)(1)-(2); 40 CFR 63.1(c)(5); 40 CFR 63.1(e); 40 CFR 63.2; 40 CFR 63.3; 40 CFR 63.4(a)-(c); 40 CFR 63.5(a)-(b); 40 CFR 63.5(d)-(f); 40 CFR 63.6(a)(1)-(2); 40 CFR 63.6(b)(1)-(5); 40 CFR 63.6(b)(7); 40 CFR 63.8(b)(1)-(2);
		40 CFR 63.8(f); 40 CFR 63.9(b)(1)-(2); 40 CFR 63.9(b)(4)-(5); 40 CFR 63.9(c); 40 CFR 63.9(h)-(j); 40 CFR 63.10(a)(5)-(7); 40 CFR 63.10(b)(1); 40 CFR 63.10(b)(2)(i)-(v); 40 CFR 63.10(b)(2)(ix); 40 CFR 63.10(b)(2)(xiv); 40 CFR 63.10(d)(1); 40 CFR 63.10(d)(5); 40 CFR 63.10(f); 40 CFR 63.12; 40 CFR 63.13; 40 CFR 63.14; and 40 CFR 63.15. A copy of 40 CFR pt. 63, subp. A is included in Appendix D. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR 63.7565, 40 CFR pt. 63, subp. A, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(B), Minn. R. 7011.7050, Minn. R. 7017.1010 & 7017.2015, subp. 3, Minn. R. 7019.0100]
EQUI 7	3570	Filterable Particulate Matter <= 0.40 pounds per million Btu heat input. The potential to emit from the unit is 0.007 lb/MMBtu due to equipment design and allowable fuels. [Minn. R. 7011.0515, subp. 1]
EQUI 7	3580	Opacity <= 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. [Minn. R. 7011.0515, subp. 2]
EQUI 7	3632	Fuel type: Natural gas only, by design. [Minn. R. 7005.0100, subp. 35a]
EQUI 7	3637	The Permittee shall keep records of fuel purchases showing fuel types. [Minn. R. 7007.0800, subp. 5]

SI Id	Sequence	Requirement
EQUI 7	4930	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. DDDDD, as follows: 40 CFR 63.7480; 40 CFR 63.7485; 40 CFR 63.7490(a)(2); 40 CFR 63.7490(b); 40 CFR 63.7495(a); 40 CFR 63.7495(d); 40 CFR 63.7499; 40 CFR 63.7500(a); 40 CFR 63.7500(a)(1); 40 CFR 63.7500(a)(3); 40 CFR 63.7500(e), for units less than or equal to 5 MMBtu; 40 CFR 63.7505(a); 40 CFR 63.7515(d), five year tune-up frequency; 40 CFR 63.7515(g); 40 CFR 63.7540(a); 40 CFR 63.7540(a)(12), for units less than or equal to 5 MMBtu; 40 CFR 63.7540(a)(13); 40 CFR 63.7545(a); 40 CFR 63.7545(f);
		40 CFR 63.7545(h); 40 CFR 63.7550(a); 40 CFR 63.7550(b), five year tune-up frequency; 40 CFR 63.7550(c) 40 CFR 63.7550(c)(1); 40 CFR 63.7550(c)(5)(i)-(iii); 40 CFR 63.7550(c)(5)(xiv); 40 CFR 63.7550(c)(5)(xvii); 40 CFR 63.7550(h)(3); 40 CFR 63.7555(a); 40 CFR 63.7555(a)(1); 40 CFR 63.7555(h); 40 CFR 63.7560; 40 CFR 63.7565; 40 CFR 63.7570; 40 CFR 63.7575; 40 CFR pt. 63, subp. DDDDD, Table 3, item 1; 40 CFR pt. 63, subp. DDDDD, Table 9. item 1(a); and 40 CFR pt. 63, subp. DDDDD, Table 10. A copy of 40 CFR pt. 63, subp. DDDDD is included in Appendix F. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than 3 years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR 63.7565, 40 CFR pt. 63, subp. DDDDD, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.7050, Minn. R. 7011.7050]

SI Id	Sequence	Requirement
EQUI 7	4940	Compliance Report: The Permittee must submit a 5-year compliance report: Due January 31, 2030, and every 60 months thereafter. Each compliance report must cover the applicable 5-year period from January 1 to December 31. Five-year compliance reports must be postmarked or submitted no later than January 31. The Permittee must submit the Compliance Report electronically to the EPA via CEDRI using the appropriate electronic report in CEDRI for 40 CFR pt. 63, subp. DDDDD. [40 CFR 63.7550(a)-(b), 40 CFR 63.7550(h)(3), 40 CFR pt. 63, subp. DDDDD(Table 9), Minn. R. 7011.7050]
EQUI 7	35780	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. A as follows: 40 CFR 63.1(a); 40 CFR 63.1(b)(1); 40 CFR 63.1(b)(3); 40 CFR 63.1(c)(1)-(2); 40 CFR 63.1(c)(5); 40 CFR 63.1(e); 40 CFR 63.2; 40 CFR 63.3; 40 CFR 63.4(a)-(c); 40 CFR 63.5(a)-(b); 40 CFR 63.5(d)-(f); 40 CFR 63.6(a)(1)-(2); 40 CFR 63.6(b)(1)-(5); 40 CFR 63.6(b)(7); 40 CFR 63.8(b)(1)-(2); 40 CFR 63.8(f); 40 CFR 63.9(b)(1)-(2);
		40 CFR 63.9(b)(4)-(5); 40 CFR 63.9(c); 40 CFR 63.9(h)-(j); 40 CFR 63.10(a)(5)-(7); 40 CFR 63.10(b)(1); 40 CFR 63.10(b)(2)(i)-(v); 40 CFR 63.10(b)(2)(ix); 40 CFR 63.10(b)(2)(xiv); 40 CFR 63.10(d)(1); 40 CFR 63.10(d)(5); 40 CFR 63.10(f); 40 CFR 63.12; 40 CFR 63.13; 40 CFR 63.14; and 40 CFR 63.15(a)-(b). A copy of 40 CFR pt. 63, subp. A is included in Appendix D. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR 63.7565, 40 CFR pt. 63, subp. A, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(B), Minn. R. 7011.7050, Minn. R. 7017.1010 & 7017.2015, subp. 3, Minn. R. 7019.0100]
EQUI 8	4825	Fuel type: Natural gas only, by design. [Minn. R. 7005.0100, subp. 35a]
EQUI 8	4830	Recordkeeping: By the last day of each calendar month, the Permittee shall record the amount of natural gas combusted in the boilers during the previous calendar month. These records shall consist of purchase records, receipts, or fuel meter readings. [40 CFR 60.48c(g), Minn. R. 7011.0570]

SI Id	Sequence	Requirement
		The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. DDDDD, as follows: 40 CFR 63.7480; 40 CFR 63.7485; 40 CFR 63.7490(a)(2); 40 CFR 63.7490(b); 40 CFR 63.7495(a); 40 CFR 63.7495(d); 40 CFR 63.7495(i); 40 CFR 63.7499(l); 40 CFR 63.7500(a); 40 CFR 63.7500(a)(1); 40 CFR 63.7500(a)(1)(iv);
EQUI 8	6240	40 CFR 63.7500(a)(2);
		40 CFR 63.7500(a)(3); 40 CFR 63.7500(b); 40 CFR 63.7500(f); 40 CFR 63.7505(a); 40 CFR 63.7510(g); 40 CFR 63.7510(k); 40 CFR 63.7515(d) annual tune-up frequency; 40 CFR 63.7515(g); 40 CFR 63.7540(a); 40 CFR 63.7540(a)(1); 40 CFR 63.7540(a)(10); 40 CFR 63.7540(a)(10)(i)-(vi); 40 CFR 63.7540(a)(13); 40 CFR 63.7540(d); 40 CFR 63.7545(a); 40 CFR 63.7545(c); 40 CFR 63.7545(f); 40 CFR 63.7545(h); 40 CFR 63.7550(a);

SI Id	Sequence	Requirement
		40 CFR 63.7550(b) annual tune-up frequency; 40 CFR 63.7550(b)(1)-(4); 40 CFR 63.7550(c); 40 CFR 63.7550(c)(1); 40 CFR 63.7550(c)(5)(i)-(iv); 40 CFR 63.7550(c)(5)(xi); 40 CFR 63.7550(c)(5)(xiii); 40 CFR 63.7550(c)(5)(xiv); 40 CFR 63.7550(c)(5)(xvii); 40 CFR 63.7550(h)(3); 40 CFR 63.7555(a); 40 CFR 63.7555(a)(1); 40 CFR 63.7555(h); 40 CFR 63.7560; 40 CFR 63.7565; 40 CFR 63.7570; 40 CFR 63.7575; 40 CFR pt. 63, subp. DDDDD, Table 3, Item 3; 40 CFR pt. 63, subp. DDDDD, Table 9, Item 1.a; and 40 CFR pt. 63, subp. DDDDD, Table 10. A copy of 40 CFR pt. 63, subp. DDDDD is included in Appendix F. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 63, subp. DDDDD, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.7050]
EQUI 8	6250	The Permittee must submit an annual compliance report: Due January 31, 2027, and every 12 months thereafter. Each annual compliance report must cover the applicable one-year period from January 1 to December 31 and must be postmarked or submitted no later than January 31. The Permittee must submit the Compliance Report electronically to the EPA via CEDRI using the appropriate electronic report in CEDRI for 40 CFR pt. 63, subp. DDDDD. [40 CFR 63.7550(a)-(b), 40 CFR 63.7550(c)(1), 40 CFR 63.7550(h)(3), 40 CFR pt. 63, subp. DDDDD(Table 9), Minn. R. 7011.7050]

SI Id	Sequence	Requirement
EQUI 8	35700	The Permittee must comply with all applicable requirements of 40 CFR pt. 60, subp. A as follows: 40 CFR 60.1(a)-(c); 40 CFR 60.2; 40 CFR 60.3; 40 CFR 60.4; 40 CFR 60.7(a)(1); 40 CFR 60.7(a)(3)-(4); 40 CFR 60.7(b); 40 CFR 60.9; 40 CFR 60.11(a); 40 CFR 60.11(d); 40 CFR 60.11(f)-(g); 40 CFR 60.12; 40 CFR 60.14(a)-(c); 40 CFR 60.14(e)-(g); 40 CFR 60.15(a)-(g); 40 CFR 60.17; 40 CFR 60.19(a)-(e); and 40 CFR 60.19(f)(1)-(4). A copy of 40 CFR pt. 60, subp. A is included in Appendix C. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 60, subp. A, 40 CFR pt. 60, subp. Dc, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(A), Minn. R. 7011.0570, Minn. R. 7011.0570, Minn. R. 7017.1010 & 7017.2015, subp. 2, Minn. R. 7019.0100]
EQUI 8	35780	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. A as follows: 40 CFR 63.1(a); 40 CFR 63.1(b)(1); 40 CFR 63.1(b)(3); 40 CFR 63.1(c)(1)-(2); 40 CFR 63.1(c)(5); 40 CFR 63.1(e); 40 CFR 63.2; 40 CFR 63.3; 40 CFR 63.4(a)-(c); 40 CFR 63.5(a)-(b); 40 CFR 63.5(d)-(f); 40 CFR 63.6(a)(1)-(2); 40 CFR 63.6(b)(1)-(5); 40 CFR 63.6(b)(7); 40 CFR 63.8(b)(1)-(2); 40 CFR 63.8(f); 40 CFR 63.9(b)(1)-(2);

SI Id	Sequence	Requirement
		40 CFR 63.9(b)(4)-(5); 40 CFR 63.9(c); 40 CFR 63.9(h)-(j); 40 CFR 63.10(a)(5)-(7); 40 CFR 63.10(b)(1); 40 CFR 63.10(b)(2)(i)-(v); 40 CFR 63.10(b)(2)(ix); 40 CFR 63.10(b)(2)(xiv); 40 CFR 63.10(d)(1); 40 CFR 63.10(d)(5); 40 CFR 63.10(f); 40 CFR 63.12; 40 CFR 63.13; 40 CFR 63.14; and 40 CFR 63.15. A copy of 40 CFR pt. 63, subp. A is included in Appendix D. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR 63.7565, 40 CFR pt. 63, subp. A, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(B), Minn. R. 7011.7050, Minn. R. 7017.1010 & 7017.2015, subp. 3, Minn. R. 7019.0100]
EQUI 9	4825	Fuel type: Natural gas only, by design. [Minn. R. 7005.0100, subp. 35a]
EQUI 9	4830	Recordkeeping: By the last day of each calendar month, the Permittee shall record the amount of natural gas combusted in the boilers during the previous calendar month. These records shall consist of purchase records, receipts, or fuel meter readings. [40 CFR 60.48c(g), Minn. R. 7011.0570]
EQUI 9	6240	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. DDDDD, as follows: 40 CFR 63.7480; 40 CFR 63.7485; 40 CFR 63.7490(a)(2); 40 CFR 63.7490(b); 40 CFR 63.7495(a); 40 CFR 63.7495(d); 40 CFR 63.7495(i); 40 CFR 63.7499(l); 40 CFR 63.7500(a); 40 CFR 63.7500(a)(1); 40 CFR 63.7500(a)(1)(iv); 40 CFR 63.7500(a)(2); 40 CFR 63.7500(a)(3); 40 CFR 63.7500(b);

SI Id	Sequence	Requirement
		40 CFR 63.7500(f); 40 CFR 63.7505(a); 40 CFR 63.7510(g); 40 CFR 63.7510(k); 40 CFR 63.7515(d) annual tune-up frequency; 40 CFR 63.7515(g); 40 CFR 63.7540(a); 40 CFR 63.7540(a)(1); 40 CFR 63.7540(a)(10); 40 CFR 63.7540(a)(10)(i)-(vi); 40 CFR 63.7540(a)(13); 40 CFR 63.7540(d); 40 CFR 63.7545(a); 40 CFR 63.7545(c); 40 CFR 63.7545(f); 40 CFR 63.7545(h); 40 CFR 63.7550(a); 40 CFR 63.7550(b) annual tune-up frequency;
		40 CFR 63.7550(b)(1)-(4); 40 CFR 63.7550(c); 40 CFR 63.7550(c)(1); 40 CFR 63.7550(c)(5)(i)-(iv); 40 CFR 63.7550(c)(5)(xi); 40 CFR 63.7550(c)(5)(xiii); 40 CFR 63.7550(c)(5)(xiv); 40 CFR 63.7550(c)(5)(xvii); 40 CFR 63.7550(h)(3); 40 CFR 63.7555(a); 40 CFR 63.7555(a)(1); 40 CFR 63.7555(h); 40 CFR 63.7560; 40 CFR 63.7565; 40 CFR 63.7570; 40 CFR 63.7575; 40 CFR pt. 63, subp. DDDDD, Table 3, Item 3; 40 CFR pt. 63, subp. DDDDD, Table 9, Item 1.a; and 40 CFR pt. 63, subp. DDDDD, Table 10. A copy of 40 CFR pt. 63, subp. DDDDD is included in Appendix F. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 63, subp. DDDDD, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.7050]
EQUI 9	6250	The Permittee must submit an annual compliance report: Due January 31, 2027, and every 12 months thereafter. Each annual compliance report must cover the applicable one-year period from January 1 to December 31 and must be postmarked or submitted no later than January 31. The Permittee must submit the Compliance Report electronically to the EPA via CEDRI using the appropriate electronic report in CEDRI for 40 CFR pt. 63, subp. DDDDD. [40 CFR 63.7550(a)-(b), 40 CFR 63.7550(c)(1), 40 CFR 63.7550(h)(3), 40 CFR pt. 63, subp. DDDDD(Table 9), Minn. R. 7011.7050]

SI Id	Sequence	Requirement
EQUI 9	35700	The Permittee must comply with all applicable requirements of 40 CFR pt. 60, subp. A as follows: 40 CFR 60.1(a)-(c); 40 CFR 60.2; 40 CFR 60.3; 40 CFR 60.4; 40 CFR 60.7(a)(1); 40 CFR 60.7(a)(3)-(4); 40 CFR 60.7(b); 40 CFR 60.9; 40 CFR 60.11(a); 40 CFR 60.11(d); 40 CFR 60.11(f)-(g); 40 CFR 60.12; 40 CFR 60.14(a)-(c); 40 CFR 60.14(e)-(g); 40 CFR 60.15(a)-(g); 40 CFR 60.17; 40 CFR 60.19(a)-(e); and 40 CFR 60.19(f)(1)-(4). A copy of 40 CFR pt. 60, subp. A is included in Appendix C. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 60, subp. A, 40 CFR pt. 60, subp. Dc, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(A), Minn. R. 7011.0570, Minn. R. 7011.0570, Minn. R. 7017.1010 & 7017.2015, subp. 2, Minn. R. 7019.0100]
EQUI 9	35780	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. A as follows: 40 CFR 63.1(a); 40 CFR 63.1(b)(1); 40 CFR 63.1(b)(3); 40 CFR 63.1(c)(1)-(2); 40 CFR 63.1(c)(5); 40 CFR 63.1(e); 40 CFR 63.2; 40 CFR 63.3; 40 CFR 63.4(a)-(c); 40 CFR 63.5(a)-(b); 40 CFR 63.5(d)-(f); 40 CFR 63.6(a)(1)-(2); 40 CFR 63.6(b)(1)-(5); 40 CFR 63.6(b)(7); 40 CFR 63.8(b)(1)-(2); 40 CFR 63.8(f); 40 CFR 63.9(b)(1)-(2);

SI Id	Sequence	Requirement
		40 CFR 63.9(b)(4)-(5); 40 CFR 63.9(c); 40 CFR 63.9(h)-(j); 40 CFR 63.10(a)(5)-(7); 40 CFR 63.10(b)(1); 40 CFR 63.10(b)(2)(i)-(v); 40 CFR 63.10(b)(2)(ix); 40 CFR 63.10(b)(2)(xiv); 40 CFR 63.10(d)(1); 40 CFR 63.10(d)(5); 40 CFR 63.10(f); 40 CFR 63.12; 40 CFR 63.13; 40 CFR 63.14; and 40 CFR 63.15. A copy of 40 CFR pt. 63, subp. A is included in Appendix D. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR 63.7565, 40 CFR pt. 63, subp. A, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(B), Minn. R. 7011.7050, Minn. R. 7017.1010 & 7017.2015, subp. 3, Minn. R. 7019.0100]
		The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began.
EQUI 10	3100	The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
		The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a.
EQUI 10	3110	The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 10	4825	Fuel type: Natural gas only, by design. [Minn. R. 7005.0100, subp. 35a]
EQUI 10	4830	Recordkeeping: By the last day of each calendar month, the Permittee shall record the amount of natural gas combusted in the boilers during the previous calendar month. These records shall consist of purchase records, receipts, or fuel meter readings. [40 CFR 60.48c(g), Minn. R. 7011.0570]
EQUI 10	6240	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. DDDDD, as follows: 40 CFR 63.7480; 40 CFR 63.7485; 40 CFR 63.7490(a)(2); 40 CFR 63.7490(b); 40 CFR 63.7495(a); 40 CFR 63.7495(d); 40 CFR 63.7495(i); 40 CFR 63.7499(l); 40 CFR 63.7500(a); 40 CFR 63.7500(a)(1); 40 CFR 63.7500(a)(1)(iv);

SI Id	Sequence	Requirement
		40 CFR 63.7500(a)(2); 40 CFR 63.7500(a)(3); 40 CFR 63.7500(b); 40 CFR 63.7500(f); 40 CFR 63.7505(a); 40 CFR 63.7510(g); 40 CFR 63.7510(k); 40 CFR 63.7515(d) annual tune-up frequency; 40 CFR 63.7515(g); 40 CFR 63.7540(a); 40 CFR 63.7540(a)(1); 40 CFR 63.7540(a)(10); 40 CFR 63.7540(a)(10)(i)-(vi); 40 CFR 63.7540(a)(13); 40 CFR 63.7540(d); 40 CFR 63.7545(a); 40 CFR 63.7545(c); 40 CFR 63.7545(f); 40 CFR 63.7545(h); 40 CFR 63.7550(a); 40 CFR 63.7550(b) annual tune-up frequency;
		40 CFR 63.7550(b)(1)-(4); 40 CFR 63.7550(c); 40 CFR 63.7550(c)(1); 40 CFR 63.7550(c)(5)(i)-(iv); 40 CFR 63.7550(c)(5)(xi); 40 CFR 63.7550(c)(5)(xiii); 40 CFR 63.7550(c)(5)(xiv); 40 CFR 63.7550(c)(5)(xvii); 40 CFR 63.7550(h)(3); 40 CFR 63.7555(a); 40 CFR 63.7555(a)(1); 40 CFR 63.7555(h); 40 CFR 63.7560; 40 CFR 63.7565; 40 CFR 63.7570; 40 CFR 63.7575; 40 CFR pt. 63, subp. DDDDD, Table 3, Item 3; 40 CFR pt. 63, subp. DDDDD, Table 9, Item 1.a; and 40 CFR pt. 63, subp. DDDDD, Table 10. A copy of 40 CFR pt. 63, subp. DDDDD is included in Appendix F. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 63, subp. DDDDD, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.7050]

SI Id	Sequence	Requirement
EQUI 10	6250	After the compliance date of EQUI 10, the Permittee must submit a compliance report: Due annually by January 31, and every 12 months thereafter. Each annual compliance report must cover the applicable one-year period from January 1 to December 31 and must be postmarked or submitted no later than January 31. The first semi-annual compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495 and ending on June 30 or December 31, whichever date is the first date that occurs at least 180 days after the compliance date that is specified for your source in 40 CFR 63.7495. If submitting an annual, biennial, or 5-year compliance report, the first compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495 and ending on December 31 within 1, 2, or 5 years, as applicable, after the compliance date that is specified for your source in 40 CFR 63.7495. The Permittee must submit the Compliance Report electronically to the EPA via CEDRI using the appropriate electronic report in CEDRI for 40 CFR pt. 63, subp. DDDDD. [40 CFR 63.7550(a)-(b), 40 CFR 63.7550(c)(1), 40 CFR 63.7550(h)(3), 40 CFR pt. 63, subp. DDDDD(Table 9), Minn. R. 7011.7050]
EQUI 10	35700	The Permittee must comply with all applicable requirements of 40 CFR pt. 60, subp. A as follows: 40 CFR 60.1(a)-(c); 40 CFR 60.2; 40 CFR 60.3; 40 CFR 60.4; 40 CFR 60.7(a)(1); 40 CFR 60.7(a)(3)-(4); 40 CFR 60.7(b); 40 CFR 60.9; 40 CFR 60.11(a); 40 CFR 60.11(d); 40 CFR 60.11(f)-(g); 40 CFR 60.12; 40 CFR 60.14(a)-(c); 40 CFR 60.14(e)-(g); 40 CFR 60.15(a)-(g); 40 CFR 60.17; 40 CFR 60.19(a)-(e); and 40 CFR 60.19(f)(1)-(4). A copy of 40 CFR pt. 60, subp. A is included in Appendix C. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 60, subp. A, 40 CFR pt. 60, subp. Dc, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(A), Minn. R. 7011.0570, Minn. R. 7011.0570, Minn. R. 7017.1010 & 7017.2015, subp. 2, Minn. R. 7019.0100]

SI Id	Sequence	Requirement
EQUI 10	35780	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. A as follows: 40 CFR 63.1(a); 40 CFR 63.1(b)(1); 40 CFR 63.1(b)(3); 40 CFR 63.1(c)(1)-(2); 40 CFR 63.1(c)(5); 40 CFR 63.1(e); 40 CFR 63.2; 40 CFR 63.3; 40 CFR 63.4(a)-(c); 40 CFR 63.5(a)-(b); 40 CFR 63.5(d)-(f); 40 CFR 63.6(a)(1)-(2); 40 CFR 63.6(b)(1)-(5); 40 CFR 63.6(b)(7); 40 CFR 63.8(b)(1)-(2); 40 CFR 63.8(f); 40 CFR 63.9(b)(1)-(2);
		40 CFR 63.9(b)(4)-(5); 40 CFR 63.9(c); 40 CFR 63.9(h)-(j); 40 CFR 63.10(a)(5)-(7); 40 CFR 63.10(b)(1); 40 CFR 63.10(b)(2)(i)-(v); 40 CFR 63.10(b)(2)(ix); 40 CFR 63.10(b)(2)(xiv); 40 CFR 63.10(d)(1); 40 CFR 63.10(d)(5); 40 CFR 63.10(f); 40 CFR 63.12; 40 CFR 63.13; 40 CFR 63.14; and 40 CFR 63.15. A copy of 40 CFR pt. 63, subp. A is included in Appendix D. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR 63.7565, 40 CFR pt. 63, subp. A, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(B), Minn. R. 7011.7050, Minn. R. 7017.1010 & 7017.2015, subp. 3, Minn. R. 7019.0100]
EQUI 10	35781	The Permittee must submit an initial notification: Due 15 calendar days after the actual date of startup of EQUI 10 as specified in 40 CFR 63.9(b)(4) and (5). [40 CFR 63.9(b)(4) & (5), Minn. R. 7011.7050]
EQUI 11	3570	Filterable Particulate Matter <= 0.40 pounds per million Btu heat input. The potential to emit from the unit is 0.007 lb/MMBtu due to equipment design and allowable fuels. [Minn. R. 7011.0515, subp. 1]
EQUI 11	3580	Opacity <= 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. [Minn. R. 7011.0515, subp. 2]
EQUI 11	3632	Fuel type: Natural gas only, by design. [Minn. R. 7005.0100, subp. 35a]
EQUI 11	3637	The Permittee shall keep records of fuel purchases showing fuel types. [Minn. R. 7007.0800, subp. 5]

SI Id	Sequence	Requirement
EQUI 11	4930	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. DDDDD, as follows: 40 CFR 63.7480; 40 CFR 63.7485; 40 CFR 63.7490(a)(2); 40 CFR 63.7490(b); 40 CFR 63.7495(a); 40 CFR 63.7495(d); 40 CFR 63.7499; 40 CFR 63.7500(a); 40 CFR 63.7500(a)(1); 40 CFR 63.7500(a)(3); 40 CFR 63.7500(e), for units less than or equal to 5 MMBtu; 40 CFR 63.7505(a); 40 CFR 63.7515(d), five year tune-up frequency; 40 CFR 63.7515(g); 40 CFR 63.7540(a); 40 CFR 63.7540(a)(12), for units less than or equal to 5 MMBtu; 40 CFR 63.7540(a)(13); 40 CFR 63.7545(a);
		40 CFR 63.7545(f); 40 CFR 63.7545(h); 40 CFR 63.7550(a); 40 CFR 63.7550(b), five year tune-up frequency; 40 CFR 63.7550(c); 40 CFR 63.7550(c)(1); 40 CFR 63.7550(c)(5)(i)-(iii); 40 CFR 63.7550(c)(5)(xiv); 40 CFR 63.7550(c)(5)(xvii); 40 CFR 63.7550(h)(3); 40 CFR 63.7555(a); 40 CFR 63.7555(a)(1); 40 CFR 63.7555(h); 40 CFR 63.7560; 40 CFR 63.7565; 40 CFR 63.7570; 40 CFR 63.7575; 40 CFR pt. 63, subp. DDDDD, Table 3, item 1; 40 CFR pt. 63, subp. DDDDD, Table 9. item 1(a); and 40 CFR pt. 63, subp. DDDDD, Table 10. A copy of 40 CFR pt. 63, subp. DDDDD is included in Appendix F. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than 3 years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 63, subp. DDDDD, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.7050]
EQUI 11	4940	Compliance Report: The Permittee must submit a 5-year compliance report: Due January 31, 2030, and every 60 months thereafter. Each compliance report must cover the applicable 5-year period from January 1 to December 31. Five-year compliance reports must be postmarked or submitted no later than January 31. The Permittee must submit the Compliance Report electronically to the EPA via CEDRI using the appropriate electronic report in CEDRI for 40 CFR pt. 63, subp. DDDDD. [40 CFR 63.7550(a)-(b), 40 CFR 63.7550(h)(3), 40 CFR pt. 63, subp. DDDDD(Table 9), Minn. R. 7011.7050]

SI Id	Sequence	Requirement
EQUI 11	35780	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. A as follows: 40 CFR 63.1(a); 40 CFR 63.1(b)(1); 40 CFR 63.1(b)(3); 40 CFR 63.1(c)(1)-(2); 40 CFR 63.1(c)(5); 40 CFR 63.1(e); 40 CFR 63.2; 40 CFR 63.3; 40 CFR 63.4(a)-(c); 40 CFR 63.5(a)-(b); 40 CFR 63.5(d)-(f); 40 CFR 63.6(a)(1)-(2); 40 CFR 63.6(b)(1)-(5); 40 CFR 63.6(b)(7); 40 CFR 63.8(b)(1)-(2); 40 CFR 63.8(f); 40 CFR 63.9(b)(1)-(2);
		40 CFR 63.9(b)(4)-(5); 40 CFR 63.9(c); 40 CFR 63.9(h)-(j); 40 CFR 63.10(a)(5)-(7); 40 CFR 63.10(b)(1); 40 CFR 63.10(b)(2)(i)-(v); 40 CFR 63.10(b)(2)(ix); 40 CFR 63.10(b)(2)(xiv); 40 CFR 63.10(d)(1); 40 CFR 63.10(d)(5); 40 CFR 63.10(f); 40 CFR 63.12; 40 CFR 63.13; 40 CFR 63.14; and 40 CFR 63.15. A copy of 40 CFR pt. 63, subp. A is included in Appendix D. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR 63.7565, 40 CFR pt. 63, subp. A, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(B), Minn. R. 7011.7050, Minn. R. 7017.1010 & 7017.2015, subp. 3, Minn. R. 7019.0100]
EQUI 12	3570	Filterable Particulate Matter <= 0.40 pounds per million Btu heat input. The potential to emit from the unit is 0.007 lb/MMBtu due to equipment design and allowable fuels. [Minn. R. 7011.0515, subp. 1]
EQUI 12	3580	Opacity <= 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. [Minn. R. 7011.0515, subp. 2]
EQUI 12	3632	Fuel type: Natural gas only, by design. [Minn. R. 7005.0100, subp. 35a]
EQUI 12	3637	The Permittee shall keep records of fuel purchases showing fuel types. [Minn. R. 7007.0800, subp. 5]

SI Id	Sequence	Requirement
		The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. DDDDD, as follows: 40 CFR 63.7480; 40 CFR 63.7485; 40 CFR 63.7490(a)(2); 40 CFR 63.7490(b); 40 CFR 63.7495(a); 40 CFR 63.7495(d); 40 CFR 63.7499; 40 CFR 63.7500(a); 40 CFR 63.7500(a)(1); 40 CFR 63.7500(a)(3); 40 CFR 63.7500(e), for units less than or equal to 5 MMBtu; 40 CFR 63.7505(a); 40 CFR 63.7515(d), five year tune-up frequency; 40 CFR 63.7515(g); 40 CFR 63.7540(a); 40 CFR 63.7540(a)(12), for units less than or equal to 5 MMBtu; 40 CFR 63.7540(a)(13);
EQUI 12	4930	40 CFR 63.7545(a);]
		40 CFR 63.7545(f); 40 CFR 63.7545(h); 40 CFR 63.7550(a); 40 CFR 63.7550(b), five year tune-up frequency; 40 CFR 63.7550(c); 40 CFR 63.7550(c)(1); 40 CFR 63.7550(c)(5)(i)-(iii); 40 CFR 63.7550(c)(5)(xiv); 40 CFR 63.7550(c)(5)(xvii); 40 CFR 63.7550(h)(3); 40 CFR 63.7555(a); 40 CFR 63.7555(a)(1); 40 CFR 63.7555(h); 40 CFR 63.7560; 40 CFR 63.7565; 40 CFR 63.7570; 40 CFR 63.7575; 40 CFR pt. 63, subp. DDDDD, Table 3, item 1; 40 CFR pt. 63, subp. DDDDD, Table 9. item 1(a); and 40 CFR pt. 63, subp. DDDDD, Table 10. A copy of 40 CFR pt. 63, subp. DDDDD is included in Appendix F. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than 3 years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR pt. 63, subp. DDDDD, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.7050
EQUI 12	4940	Compliance Report: The Permittee must submit a 5-year compliance report: Due January 31, 2030, and every 60 months thereafter. Each compliance report must cover the applicable 5-year period from January 1 to December 31. Five-year compliance reports must be postmarked or submitted no later than January 31. The Permittee must submit the Compliance Report electronically to the EPA via CEDRI using the appropriate electronic report in CEDRI for 40 CFR pt. 63, subp. DDDDD. [40 CFR 63.7550(a)-(b), 40 CFR 63.7550(h)(3), 40 CFR pt. 63, subp. DDDDD(Table 9), Minn. R. 7011.7050]

SI Id	Sequence	Requirement
EQUI 12	35780	The Permittee must comply with all applicable requirements of 40 CFR pt. 63, subp. A as follows: 40 CFR 63.1(a); 40 CFR 63.1(b)(1); 40 CFR 63.1(b)(3); 40 CFR 63.1(c)(1)-(2); 40 CFR 63.1(c)(5); 40 CFR 63.1(e); 40 CFR 63.2; 40 CFR 63.3; 40 CFR 63.4(a)-(c); 40 CFR 63.5(a)-(b); 40 CFR 63.5(d)-(f); 40 CFR 63.6(a)(1)-(2); 40 CFR 63.6(b)(1)-(5); 40 CFR 63.6(b)(7); 40 CFR 63.8(b)(1)-(2); 40 CFR 63.8(f); 40 CFR 63.9(b)(1)-(2); 40 CFR 63.9(b)(4)-(5);
		40 CFR 63.9(c); 40 CFR 63.9(h)-(j); 40 CFR 63.10(a)(5)-(7); 40 CFR 63.10(b)(1); 40 CFR 63.10(b)(2)(i)-(v); 40 CFR 63.10(b)(2)(ix); 40 CFR 63.10(b)(2)(xiv); 40 CFR 63.10(d)(1); 40 CFR 63.10(d)(5); 40 CFR 63.10(f); 40 CFR 63.12; 40 CFR 63.13; 40 CFR 63.14; and 40 CFR 63.15. A copy of 40 CFR pt. 63, subp. A is included in Appendix D. If the standard changes or upon adoption of a new or amended federal applicable requirement, and if there are more than three years remaining in the permit term, the Permittee shall file an application for an amendment within nine months of promulgation of the applicable requirement, pursuant to Minn. R. 7007.0400, subp. 3. [40 CFR 63.7565, 40 CFR pt. 63, subp. A, Minn. R. 7007.0400, subp. 3, Minn. R. 7007.1150-7007.1500, Minn. R. 7011.0050, subp. 1(B), Minn. R. 7011.7050, Minn. R. 7017.1010 & 7017.2015, subp. 3, Minn. R. 7019.0100]
EQUI 15	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
EQUI 15	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 15	4000	Daily Recordkeeping. For each batch processed through EQUI 15, the Permittee must record and maintain the following: 1) each material used in EQUI 15; 2) for each material used in EQUI 15, whether the material is a VOC-containing or aqueous solution as determined by the Material Content requirement at COMG 2, and 3) for each material used in EQUI 15, whether TREA 1 was operating. This must be based on a written log. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
EQUI 15	19650	The Permittee must vent emissions from EQUI 15 to control equipment meeting the requirements of TREA 2 whenever EQUI 15 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 15	19680	The Permittee must vent emissions from EQUI 15 to control equipment meeting the requirements of TREA 1 whenever EQUI 15 operates using VOC-containing materials. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) & Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 16	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
EQUI 16	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 16	4000	Daily Recordkeeping. For each batch processed through EQUI 16, the Permittee must record and maintain the following: 1) each material used in EQUI 16; 2) for each material used in EQUI 16, whether the material is a VOC-containing or aqueous solution as determined by the Material Content requirement at COMG 2, and 3) for each material used in EQUI 16, whether TREA 1 was operating. This must be based on a written log. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 16	19650	The Permittee must vent emissions from EQUI 16 to control equipment meeting the requirements of TREA 3 whenever EQUI 16 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 16	20000	The Permittee must vent emissions from EQUI 16 to control equipment meeting the requirements of TREA 1 whenever EQUI 16 operates using VOC-containing materials. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000, Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) & Minn. R. 7007.3000]
EQUI 17	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 17	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 17	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
EQUI 17	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 17	4000	Daily Recordkeeping. For each batch processed through EQUI 17, the Permittee must record and maintain the following: 1) each material used in EQUI 17; 2) for each material used in EQUI 17, whether the material is a VOC-containing or aqueous solution as determined by the Material Content requirement at COMG 2, and 3) for each material used in EQUI 17, whether TREA 1 was operating. This must be based on a written log. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 17	19650	The Permittee must vent emissions from EQUI 17 to control equipment meeting the requirements of TREA 4 whenever EQUI 17 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
EQUI 17	20000	The Permittee must vent emissions from EQUI 17 to control equipment meeting the requirements of TREA 1 whenever EQUI 17 operates using VOC-containing materials. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) & Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 18	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 18	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 18	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
EQUI 18	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 18	3691	The Permittee must use only aqueous solutions in EQUI 18. Use of VOC-containing materials is prohibited. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 18	3840	Daily Recordkeeping. On each day of operation, the Permittee shall record and maintain a record of each solution used in EQUI 18 and whether each solution is an aqueous or VOC-containing material as determined by the Material Content requirement at COMG 2. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 18	19650	The Permittee must vent emissions from EQUI 18 to control equipment meeting the requirements of TREA 5 whenever EQUI 18 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 19	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 19	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 19	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
EQUI 19	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 19	4500	Daily Recordkeeping. For each batch processed through EQUI 19, the Permittee must record and maintain the following: 1) each material used in EQUI 19; 2) for each material used in EQUI 19, whether the material is a VOC-containing or aqueous solution as determined by the Material Content requirement at COMG 2, and 3) for each material used in EQUI 19, whether TREA 1 was operating. This must be based on a written log. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 19	19650	The Permittee must vent emissions from EQUI 19 to control equipment meeting the requirements of TREA 6 whenever EQUI 19 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
EQUI 19	20000	The Permittee must vent emissions from EQUI 19 to control equipment meeting the requirements of TREA 1 whenever EQUI 19 operates using VOC-containing materials. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) & Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 22	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
EQUI 22	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 22	4100	Daily Recordkeeping. For each batch processed through EQUI 22, the Permittee must record and maintain the following: 1) each material used in EQUI 22; 2) for each material used in EQUI 22, whether the material is a VOC-containing or aqueous solution as determined by the Material Content requirement at COMG 2, and 3) for each material used in EQUI 22, whether TREA 1 was operating. This must be based on a written log. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.30000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 22	19650	The Permittee must vent emissions from EQUI 22 to control equipment meeting the requirements of TREA 9 whenever EQUI 22 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 22	20000	The Permittee must vent emissions from EQUI 22 to control equipment meeting the requirements of TREA 1 whenever EQUI 22 operates using VOC-containing solvent. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) & Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 23	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 23	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 23	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
EQUI 23	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 23	3691	The Permittee must use only aqueous solutions in EQUI 23. Use of VOC-containing materials is prohibited. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 23	3840	Daily Recordkeeping. On each day of operation, the Permittee shall record and maintain a record of each solution used in EQUI 23 and whether each solution is an aqueous or VOC-containing material as determined by the Material Content requirement at COMG 2. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 23	19650	The Permittee must vent emissions from EQUI 23 to control equipment meeting the requirements of TREA 10 whenever EQUI 23 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 24	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]

SI Id	Sequence	Requirement
EQUI 24	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 24	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
EQUI 24	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 24	3691	The Permittee must use only aqueous solutions in EQUI 24. Use of VOC-containing materials is prohibited. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 24	3840	Daily Recordkeeping. On each day of operation, the Permittee shall record and maintain a record of each solution used in EQUI 24 and whether each solution is an aqueous or VOC-containing material as determined by the Material Content requirement at COMG 2. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 24	19650	The Permittee must vent emissions from EQUI 24 to control equipment meeting the requirements of TREA 11 whenever EQUI 24 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 25	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 25	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 25	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
EQUI 25	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 25	3691	The Permittee must use only aqueous solutions in EQUI 25. Use of VOC-containing materials is prohibited. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 25	3840	Daily Recordkeeping. On each day of operation, the Permittee shall record and maintain a record of each solution used in EQUI 25 and whether each solution is an aqueous or VOC-containing material as determined by the Material Content requirement at COMG 2. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 25	19650	The Permittee must vent emissions from EQUI 25 to control equipment meeting the requirements of EQUI 12 whenever EQUI 25 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 26	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 26	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 26	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]

SI Id	Sequence	Requirement
EQUI 26	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 26	3691	The Permittee must use only aqueous solutions in EQUI 26. Use of VOC-containing materials is prohibited. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 26	3840	Daily Recordkeeping. On each day of operation, the Permittee shall record and maintain a record of each solution used in EQUI 26 and whether each solution is an aqueous or VOC-containing material as determined by the Material Content requirement at COMG 2. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 26	19650	The Permittee must vent emissions from EQUI 26 to control equipment meeting the requirements of TREA 13 whenever EQUI 26 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 27	19649	The Permittee must vent emissions from EQUI 27 to control equipment meeting the requirements of TREA 14, 15, 16 or 17 whenever EQUI 27 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 27	19650	Hood alignment. The Permittee must align the hood of the fabric filter such that the face of the collection hood is no more than 10 inches from the emission source of EQUI 27. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 27	19651	Hood inspection. Once each day of operation, the Permittee must inspect EQUI 27 to determine whether the face of the collection hood of the fabric filter is placed no more than 10 inches from the emission source of the mill. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 27	19652	The Permittee must record the time and date of the hood inspection, the fabric filter ID (by TREA #), and whether the face of the collection hood was within 10 inches of the emission source of EQUI 27. [Minn. R. 7007.0800, subps. 4-5]
EQUI 27	19653	Corrective Actions: The Permittee must take corrective action as soon as possible if the collection hood is more than 10 inches from the emission source of the mill. Corrective actions must align the face of the collection hood to within 10 inches of the mill emission source. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
EQUI 28	19649	The Permittee must vent emissions from EQUI 28 to control equipment meeting the requirements of TREA 14, 15, 16 or 17 whenever EQUI 28 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 28	19650	Hood alignment. The Permittee must align the hood of the fabric filter such that the face of the collection hood is no more than 10 inches from the emission source of EQUI 28. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 28	19651	Hood inspection. Once each day of operation, the Permittee must inspect EQUI 28 to determine whether the face of the collection hood of the fabric filter is placed no more than 10 inches from the emission source of the mill. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 28	19652	The Permittee must record the time and date of the hood inspection, the fabric filter ID (by TREA #), and whether the face of the collection hood was within 10 inches of the emission source of EQUI 27. [Minn. R. 7007.0800, subps. 4-5]
EQUI 28	19653	Corrective Actions: The Permittee must take corrective action as soon as possible if the collection hood is more than 10 inches from the emission source of the mill. Corrective actions must align the face of the collection hood to within 10 inches of the mill emission source. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
EQUI 29	19649	The Permittee must vent emissions from EQUI 29 to control equipment meeting the requirements of TREA 14, 15, 16 or 17 whenever EQUI 29 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 29	19650	Hood alignment. The Permittee must align the hood of the fabric filter such that the face of the collection hood is no more than 10 inches from the emission source of EQUI 29. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]

SI Id	Sequence	Requirement
EQUI 29	19651	Hood inspection. Once each day of operation, the Permittee must inspect EQUI 29 to determine whether the face of the collection hood of the fabric filter is placed no more than 10 inches from the emission source of the mill. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 29	19652	The Permittee must record the time and date of the hood inspection, the fabric filter ID (by TREA #), and whether the face of the collection hood was within 10 inches of the emission source of EQUI 27. [Minn. R. 7007.0800, subps. 4-5]
EQUI 29	19653	Corrective Actions: The Permittee must take corrective action as soon as possible if the collection hood is more than 10 inches from the emission source of the mill. Corrective actions must align the face of the collection hood to within 10 inches of the mill emission source. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
EQUI 30	19649	The Permittee must vent emissions from EQUI 30 to control equipment meeting the requirements of TREA 14, 15, 16, or 17 whenever EQUI 30 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 30	19650	Hood alignment. The Permittee must align the hood of the fabric filter such that the face of the collection hood is no more than 10 inches from the emission source of EQUI 30. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 30	19651	Hood inspection. Once each day of operation, the Permittee must inspect EQUI 30 to determine whether the face of the collection hood of the fabric filter is placed no more than 10 inches from the emission source of the mill. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 30	19652	The Permittee must record the time and date of the hood inspection, the fabric filter ID (by TREA #), and whether the face of the collection hood was within 10 inches of the emission source of EQUI 27. [Minn. R. 7007.0800, subps. 4-5]
EQUI 30	19653	Corrective Actions: The Permittee must take corrective action as soon as possible if the collection hood is more than 10 inches from the emission source of the mill. Corrective actions must align the face of the collection hood to within 10 inches of the mill emission source. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
EQUI 31	19649	The Permittee must vent emissions from EQUI 31 to control equipment meeting the requirements of TREA 14, 15, 16, or 17 whenever EQUI 31 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 31	19650	Hood alignment. The Permittee must align the hood of the fabric filter such that the face of the collection hood is no more than 10 inches from the emission source of EQUI 31. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 31	19651	Hood inspection. Once each day of operation, the Permittee must inspect EQUI 31 to determine whether the face of the collection hood of the fabric filter is placed no more than 10 inches from the emission source of the mill. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 31	19652	The Permittee must record the time and date of the hood inspection, the fabric filter ID (by TREA #), and whether the face of the collection hood was within 10 inches of the emission source of EQUI 27. [Minn. R. 7007.0800, subps. 4-5]
EQUI 31	19653	Corrective Actions: The Permittee must take corrective action as soon as possible if the collection hood is more than 10 inches from the emission source of the mill. Corrective actions must align the face of the collection hood to within 10 inches of the mill emission source. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
EQUI 32	19649	The Permittee must vent emissions from EQUI 32 to control equipment meeting the requirements of TREA 14, 15, 16 or 17 whenever EQUI 32 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 32	19650	Hood alignment. The Permittee must align the hood of the fabric filter such that the face of the collection hood is no more than 10 inches from the emission source of EQUI 32. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]

SI Id	Sequence	Requirement
EQUI 32	19651	Hood inspection. Once each day of operation, the Permittee must inspect EQUI 32 to determine whether the face of the collection hood of the fabric filter is placed no more than 10 inches from the emission source of the mill. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 32	19652	The Permittee must record the time and date of the hood inspection, the fabric filter ID (by TREA #), and whether the face of the collection hood was within 10 inches of the emission source of EQUI 27. [Minn. R. 7007.0800, subps. 4-5]
EQUI 32	19653	Corrective Actions: The Permittee must take corrective action as soon as possible if the collection hood is more than 10 inches from the emission source of the mill. Corrective actions must align the face of the collection hood to within 10 inches of the mill emission source. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
EQUI 33	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
EQUI 33	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 33	19650	The Permittee must vent emissions from EQUI 33 to control equipment meeting the requirements of TREA 18 whenever EQUI 33 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 34	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
EQUI 34	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]
EQUI 34	19650	The Permittee must vent emissions from EQUI 34 to control equipment meeting the requirements of TREA 19 whenever EQUI 34 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
EQUI 45	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 45	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 46	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 46	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 49	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]

SI Id	Sequence	Requirement
EQUI 49	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 49	19650	The Permittee must vent emissions from EQUI 49 to control equipment meeting the requirements of TREA 14, 15, 16 or 17 whenever EQUI 49 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 49	19660	Hood alignment. The Permittee must align the hood of the fabric filter such that the face of the collection hood is no more than 10 inches from the emission source of EQUI 31. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 49	19661	Hood inspection. Once each day of operation, the Permittee must inspect EQUI 32 to determine whether the face of the collection hood of the fabric filter (EQUI 14, 15, 16, or 17) is placed no more than 10 inches from the emission source of the mill. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 49	19662	The Permittee must record the time and date of the hood inspection, the fabric filter being used (by TREA #), and whether the face of the collection hood was within 10 inches of the emission source of the mill. [Minn. R. 7007.0800, subps. 4-5]
EQUI 49	19663	Corrective Actions: The Permittee must take corrective action as soon as possible if the collection hood is more than 10 inches from the emission source of the mill. Corrective actions must align the face of the collection hood to within 10 inches of the emission source of the mill. The Permittee must keep a record of the type and date of any corrective action taken. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
EQUI 50	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 50	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 50	19650	The Permittee must vent emissions from EQUI 50 to control equipment meeting the requirements of TREA 14, 15, 16 or 17 whenever EQUI 50 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 50	19660	Hood alignment. The Permittee must align the hood of the fabric filter such that the face of the collection hood is no more than 10 inches from the emission source of EQUI 31. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 50	19661	Hood inspection. Once each day of operation, the Permittee must inspect EQUI 32 to determine whether the face of the collection hood of the fabric filter is placed no more than 10 inches from the emission source of the mill. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 50	19662	The Permittee must record the time and date of the hood inspection, the fabric filter being used (by TREA #), and whether the face of the collection hood was within 10 inches of the emission source of the mill. [Minn. R. 7007.0800, subps. 4-5]
EQUI 50	19663	Corrective Actions: The Permittee must take corrective action as soon as possible if the collection hood is more than 10 inches from the emission source of the mill. Corrective actions must align the face of the collection hood to within 10 inches of the emission source of the mill. The Permittee must keep a record of the type and date of any corrective action taken. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]

SI Id	Sequence	Requirement
EQUI 51	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 51	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 51	19650	The Permittee must vent emissions from EQUI 51 to control equipment meeting the requirements of TREA 14, 15, 16 or 17 whenever EQUI 51 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 51	19660	Hood alignment. The Permittee must align the hood of the fabric filter such that the face of the collection hood is no more than 10 inches from the emission source of EQUI 31. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 51	19661	Hood inspection. Once each day of operation, the Permittee must inspect EQUI 32 to determine whether the face of the collection hood of the fabric filter is placed no more than 10 inches from the emission source of the mill. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 51	19662	The Permittee must record the time and date of the hood inspection, the fabric filter being used (by TREA #), and whether the face of the collection hood was within 10 inches of the emission source of the mill. [Minn. R. 7007.0800, subps. 4-5]
EQUI 51	19663	Corrective Actions: The Permittee must take corrective action as soon as possible if the collection hood is more than 10 inches from the emission source of the mill. Corrective actions must align the face of the collection hood to within 10 inches of the emission source of the mill. The Permittee must keep a record of the type and date of any corrective action taken. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
EQUI 52	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 52	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 52	19650	The Permittee must vent emissions from EQUI 52 to control equipment meeting the requirements of TREA 14, 15, 16 or 17 whenever EQUI 52 operates. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 52	19660	Hood alignment. The Permittee must align the hood of the fabric filter such that the face of the collection hood is no more than 10 inches from the emission source of EQUI 31. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 52	19661	Hood inspection. Once each day of operation, the Permittee must inspect EQUI 32 to determine whether the face of the collection hood of the fabric filter is placed no more than 10 inches from the emission source of the mill. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) & Minn. R. 7007.3000]
EQUI 52	19662	The Permittee must record the time and date of the hood inspection, the fabric filter being used (by TREA #), and whether the face of the collection hood was within 10 inches of the emission source of the mill. [Minn. R. 7007.0800, subps. 4-5]

SI Id	Sequence	Requirement
EQUI 52	19663	Corrective Actions: The Permittee must take corrective action as soon as possible if the collection hood is more than 10 inches from the emission source of the mill. Corrective actions must align the face of the collection hood to within 10 inches of the emission source of the mill. The Permittee must keep a record of the type and date of any corrective action taken. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
EQUI 54	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 54	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 55	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 55	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 56	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 56	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 57	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 57	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 58	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]

SI Id	Sequence	Requirement
EQUI 58	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 59	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 59	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 60	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 60	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 61	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 61	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 62	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 62	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 63	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]

SI Id	Sequence	Requirement
EQUI 63	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 64	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 64	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 65	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 65	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 66	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 66	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 67	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 67	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 69	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]

SI Id	Sequence	Requirement
EQUI 69	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 70	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 70	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 71	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 71	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 74	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 76	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 76	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 78	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
EQUI 78	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
FUGI 1	3680	Opacity <= 20 percent opacity. [Minn. R. 7011.0715, subp. 1(B)]
FUGI 1	3690	Particulate Matter <= 0.30 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. [Minn. R. 7011.0715, subp. 1(A)]

SI Id	Sequence	Requirement
TREA 1	16440	The Permittee must vent emissions from EQUIs 15, 16, 17, 19, and 22 to TREA 1 whenever EQUIs 15, 16, 17, 19, and 22 operate using VOC-containing materials, and operate and maintain TREA 1 at all times that any emissions are vented to TREA 1. The Permittee must document periods of non-operation of the control equipment TREA 1 whenever EQUIs 15, 16, 17, 19, and 22 operate. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 1	16450	If the Permittee replaces TREA 1, the replacement control must meet or exceed the control efficiency requirements of TREA 1 as well as comply with all other requirements of TREA 1. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 1	18731	The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for HAPs - Total >= 98 percent control efficiency. [40 CFR 63.1254(b)(1), Minn. R. 7011.7580]
TREA 1	19130	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Volatile Organic Compounds >= 98 percent control efficiency. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 1	19150	Temperature >= 1668 degrees Fahrenheit 3-hour rolling average at the combustion chamber outlet (Minimum Temperature Limit) as determined during the June 20, 2023 performance test, unless a new limit is set pursuant to Minn. R. 7017.2025, subp. 3, as detailed below. If the recorded 3-hour rolling average temperature is below the Minimum Temperature Limit, the VOC used during that time must be considered uncontrolled until the average temperature is above the Minimum Temperature Limit. This must be reported as a deviation. [40 CFR 63.1258(b)(1)(vii), Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 1	19160	The Permittee must operate and maintain the thermal oxidizer in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 1	19170	Temperature Monitoring: The Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records the combustion chamber temperature of the thermal oxidizer. The monitoring device shall have a margin of error less than the greater of +/- 0.75 percent of the temperature being measured or +/- 4.5 degrees Fahrenheit. The recording device shall also calculate the three-hour rolling average combustion chamber temperature. Recorded values outside the range specified in this permit are considered Deviations as defined by Minn. R. 7007.0100, subp. 8a. [40 CFR 64.3(b)(4)(ii) and Minn. R. 7017.0200, Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 1	19180	Daily Monitoring: The Permittee shall physically verify the operation of the temperature recording device at least once each operating day to verify that it is working and recording properly. The Permittee shall maintain a written record of the daily verifications. [40 CFR 64.3(b), Minn. R. 7017.0200, Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 1	19190	Monitoring Equipment: The Permittee shall install and maintain thermocouples to conduct temperature monitoring required by this permit. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required. [40 CFR 64.7(b), Minn. R. 7017.0200]
TREA 1	19200	The Permittee shall maintain a continuous hard copy readout or computer disk file of the temperature readings and calculated three hour rolling average temperatures for the combustion chamber. [40 CFR 64.9(b), Minn. R. 7017.0200, Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 1	19210	Annual Calibration: The Permittee shall calibrate the temperature monitor at least once every 12 months and shall maintain a written record of the calibration and any action resulting from the calibration. [40 CFR 64.3, Minn. R. 7017.0200]

SI Id	Sequence	Requirement
TREA 1	19220	Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment internal and external system components, including but not limited to the refractory, heat exchanger, and electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 1	19230	Annual Inspection: At least once per calendar year, the Permittee shall conduct an internal inspection of the control device that includes all operating systems of the control device. The Permittee shall maintain a written record of the inspection and any action resulting from the inspection. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 1	19240	For periods when the thermal oxidizer is operated above the minimum combustion chamber temperature, the Permittee must use either one of the following when completing calculations as required elsewhere in this permit: a. The control efficiency limit specified in this permit for this equipment (98%); or b. The control efficiency determined during the most recent MPCA approved performance test. If the tested efficiency is less than the efficiency limit in this permit, the Permittee must use the tested value in all calculations until the efficiency is demonstrated to be above the permit limit through a new test. [Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 1	19250	Corrective Actions: If the temperature is below the minimum specified by this permit or if the thermal oxidizer or any of its components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the temperature to at least the permitted minimum and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the thermal oxidizer. The Permittee shall keep a record of the type and date of any corrective action taken. [40 CFR 64.7(d), Minn. R. 7017.0200]
TREA 1	19280	Protocol for Re-Setting the Minimum Temperature Limit: The Permittee shall conduct performance testing to measure the VOC destruction efficiency as required elsewhere in this permit. If the Minimum Temperature Limit is to be re-set, the re-set shall be based on the average temperature values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. During the performance test, the Permittee must continuously monitor the temperature in the combustion chamber. The Permittee must calculate the average temperature from the combustion chamber by reducing the temperature data to an average temperature based on the average exhibited over all three compliant test runs. Downtime of 15 minutes or more is not to be included as operating time. The Minimum Temperature Limit shall be re-set as follows: - if the 3-hour average temperature recorded during the test is within 25 deg F of the limit, it shall not be re-set and the established Minimum Temperature Limit remains unchanged; or - if the 3-hour average temperature is more than 25 deg F greater or less than the established limit, it shall be re-set as the average temperature of the performance test. Ongoing compliance with the temperature limit will be determined using the same data acquisition and reduction as was used during the performance test. The new Minimum Temperature Limit determined using this Protocol shall be effective upon receipt of the follow up compliance letter that approves the test results and shall be incorporated into the permit when the permit is next amended. [Minn. R. 7017.2025, Title I Condition: Avoid major modification under 40 CFR 52.21(b)(2) and Minn. R. 7007.3000, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn.
TREA 1	19290	The Permittee must apply for and obtain a major permit amendment if the Permittee wishes to deviate from the Protocol for Re-setting the Minimum Temperature Limit required by this permit. [Minn. R. 7007.1500, subp. 1]
TREA 1	19300	Notwithstanding the Protocol detailed above, the MPCA reserves the right to set operational limits and requirements as allowed under Minn. R. 7017.2025. If the MPCA sets limits, the new limits shall be implemented upon receipt of the follow up compliance letter that notifies the Permittee of preliminary approval. The limits set according to Minn. R. 7017.2025 are final upon issuance of a permit amendment incorporating the change. [Minn. R. 7017.2025]

SI Id	Sequence	Requirement
TREA 1	19870	Volatile Organic Compounds: The Permittee shall conduct a performance test due before 5/5/2027 and every 60 months thereafter to verify the VOC control efficiency. The first test is due by the date specified above and all subsequent tests shall be completed every 60 months thereafter by the due date (month and day) and as described below. The performance test shall be conducted at worst-case conditions defined at Minn. R. 7017.2005, subp. 8 or at the operating conditions described at Minn. R. 7017.2025, subp. 2, using EPA Reference Methods 25A, or other method approved by MPCA in the performance test plan approval. Testing conducted during the 60 days prior to the performance test due date will not reset the test due date for future testing as required by this permit or within a follow up compliance letter. Testing conducted more than 60 days prior to the performance test due date satisfies this test due date requirement but will reset future performance test due dates based on the performance test date. [Minn. R. 7017.2020, subp. 1, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 1	21290	HAPs - Total: The Permittee shall conduct a performance test due before 5/5/2027 and every 60 months thereafter to verify the HAPs - Total control efficiency of TREA 1. The first test is due by the date specified above and all subsequent tests shall be completed every 60 months thereafter by the due date (month and day) and as described below. The performance test shall be conducted at worst-case conditions defined at Minn. R. 7017.2005, subp. 8 or at the operating conditions described at Minn. R. 7017.2025, subp. 2, using EPA Reference Method 18, 320, or other method approved by MPCA in the performance test plan approval. Testing conducted during the 60 days prior to the performance test due date will not reset the test due date for future testing as required by this permit or within a follow up compliance letter. Testing conducted more than 60 days prior to the performance test due date satisfies this test due date requirement but will reset future performance test due dates based on the performance test date. [Minn. R. 7007.0800, subp. 2(A), Minn. R. 7017.2020, subp. 1]
TREA 1	35750	Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing temperature range, the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring change. [40 CFR 64.7(e), Minn. R. 7017.0200]
TREA 1	35760	As required by 40 CFR 64.9(a)(2), for the Semi-Annual Deviations Report required by this permit and/or the Notification of Deviations Endangering Human Health and the Environment required by this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents. [40 CFR 64.9(a)(2), Minn. R. 7017.0200]
TREA 1	35770	The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. [40 CFR 64.9(b), Minn. R. 7017.0200]
TREA 2	17610	The Permittee must vent emissions from EQUI 15 to TREA 2 whenever EQUI 15 operates, and operate and maintain TREA 2 at all times that any emissions are vented to TREA 2. The Permittee must document periods of non-operation of the control equipment TREA 2 whenever EQUI 15 is operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
TREA 2	17615	If the Permittee replaces TREA 2, the replacement control must meet or exceed the control efficiency requirements of TREA 2 as well as comply with all other requirements of TREA 2. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 2	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 99 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 2	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 2	18530	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 2	18540	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 2	18540	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 2	18540	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 2	18550	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 2	18565	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 2	18570	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 2	19640	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]

SI Id	Sequence	Requirement
TREA 3	17610	The Permittee must vent emissions from EQUI 16 to TREA 3 whenever EQUI 16 operates, and operate and maintain TREA 3 at all times that any emissions are vented to TREA 3. The Permittee must document periods of non-operation of the control equipment TREA 3 whenever EQUI 16 is operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 3	17615	If the Permittee replaces TREA 3, the replacement control must meet or exceed the control efficiency requirements of TREA 3 as well as comply with all other requirements of TREA 3. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 3	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 99 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 3	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 3	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 3	18520	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 3	18530	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 3	18550	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 3	18560	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 3	18570	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 3	19640	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]

SI Id	Sequence	Requirement
TREA 3	19640	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 4	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 4	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 4	17610	The Permittee must vent emissions from EQUI 17 to TREA 4 whenever EQUI 17 operates, and operate and maintain TREA 4 at all times that any emissions are vented to TREA 4. The Permittee must document periods of non-operation of the control equipment TREA 4 whenever EQUI 17 is operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 4	17615	If the Permittee replaces TREA 4, the replacement control must meet or exceed the control efficiency requirements of TREA 4 as well as comply with all other requirements of TREA 4. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 4	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 99 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 4	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 4	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 4	18530	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 4	18550	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 4	18560	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
TREA 4	18565	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 4	18570	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 4	19640	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 4	19640	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 5	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 5	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 5	17610	The Permittee must vent emissions from EQUI 18 to TREA 5 whenever EQUI 18 operates, and operate and maintain TREA 5 at all times that any emissions are vented to TREA 5. The Permittee must document periods of non-operation of the control equipment TREA 5 whenever EQUI 18 is operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 5	17615	If the Permittee replaces TREA 5, the replacement control must meet or exceed the control efficiency requirements of TREA 5 as well as comply with all other requirements of TREA 5. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 5	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 99 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 5	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 5	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 5	18510	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]

SI Id	Sequence	Requirement
TREA 5	18530	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 5	18550	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 5	18560	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 5	18565	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 5	18570	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 5	19640	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 6	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 6	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 6	17610	The Permittee must vent emissions from EQUI 19 to TREA 6 whenever EQUI 19 operates, and operate and maintain TREA 6 at all times that any emissions are vented to TREA 6. The Permittee must document periods of non-operation of the control equipment TREA 6 whenever EQUI 19 is operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 6	17615	If the Permittee replaces TREA 6, the replacement control must meet or exceed the control efficiency requirements of TREA 6 as well as comply with all other requirements of TREA 6. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
TREA 6	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 99 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 6	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 6	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 6	18510	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 6	18530	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 6	18550	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 6	18550	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 6	18565	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 6	18570	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 6	19640	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 9	17610	The Permittee must vent emissions from EQUI 22 to TREA 9 whenever EQUI 22 operates, and operate and maintain TREA 9 at all times that any emissions are vented to TREA 9. The Permittee must document periods of non-operation of the control equipment TREA 9 whenever EQUI 22 is operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
TREA 9	17615	If the Permittee replaces TREA 9, the replacement control must meet or exceed the control efficiency requirements of TREA 9 as well as comply with all other requirements of TREA 9. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 9	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 99 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 9	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 9	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 9	18510	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 9	18530	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 9	18550	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 9	18560	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 9	18565	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 9	18570	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 9	19640	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]

SI Id	Sequence	Requirement
TREA 10	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 10	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 10	17610	The Permittee must vent emissions from EQUI 23 to TREA 10 whenever EQUI 23 operates, and operate and maintain TREA 10 at all times that any emissions are vented to TREA 10. The Permittee must document periods of non-operation of the control equipment TREA 10 whenever EQUI 23 is operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 10	17615	If the Permittee replaces TREA 10, the replacement control must meet or exceed the control efficiency requirements of TREA 10 as well as comply with all other requirements of TREA 10. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 10	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 99 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 10	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 10	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 10	18501	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 10	18510	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 10	18530	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
TREA 10	18550	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 10	18560	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 10	18565	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 10	18570	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 11	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 11	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 11	17610	The Permittee must vent emissions from EQUI 24 to TREA 11 whenever EQUI 24 operates, and operate and maintain TREA 11 at all times that any emissions are vented to TREA 11. The Permittee must document periods of non-operation of the control equipment TREA 11 whenever EQUI 24 is operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 11	17615	If the Permittee replaces TREA 11, the replacement control must meet or exceed the control efficiency requirements of TREA 11 as well as comply with all other requirements of TREA 11. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 11	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 99 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 11	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 11	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
TREA 11	18510	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 11	18530	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 11	18550	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 11	18560	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 11	18565	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 11	18570	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 11	19640	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 12	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 12	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 12	17610	The Permittee must vent emissions from EQUI 25 to TREA 12 whenever EQUI 25 operates, and operate and maintain TREA 12 at all times that any emissions are vented to TREA 12. The Permittee must document periods of non-operation of the control equipment TREA 12 whenever EQUI 25 is operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
TREA 12	17615	If the Permittee replaces TREA 12, the replacement control must meet or exceed the control efficiency requirements of TREA 12 as well as comply with all other requirements of TREA 12. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 12	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 99 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 12	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 12	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 12	18510	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 12	18530	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 12	18550	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 12	18550	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 12	18560	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 12	18565	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]

SI Id	Sequence	Requirement
TREA 12	18570	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 12	19640	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 13	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 13	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 13	17610	The Permittee must vent emissions from EQUI 26 to TREA 13 whenever EQUI 26 operates, and operate and maintain TREA 13 at all times that any emissions are vented to TREA 13. The Permittee must document periods of non-operation of the control equipment TREA 13 whenever EQUI 26 is operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 13	17615	If the Permittee replaces TREA 13, the replacement control must meet or exceed the control efficiency requirements of TREA 13 as well as comply with all other requirements of TREA 13. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 13	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 99 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 13	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 13	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 13	18510	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 13	18530	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 13	18550	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
TREA 13	18560	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 13	18565	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 13	18570	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 13	19640	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 14	17610	The Permittee must vent emissions from EQUIs 27-32 and 49-52 to TREA 14, 15, 16, or 17 whenever EQUIs 27-32 and 49-52 operate, and operate and maintain TREA 14, 15, 16, and 17 at all times that any emissions are vented to TREA 14, 15, 16, or 17. The Permittee must document periods of non-operation of the control equipment TREA 14, 15, 16, or 17 whenever EQUIs 27-32 and 49-52 are operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 14	17615	If the Permittee replaces TREA 14, the replacement control must meet or exceed the control efficiency requirements of TREA 14 as well as comply with all other requirements of TREA 14. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 14	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 79 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 14	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 74 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 14	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 74 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 14	18510	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 14	18530	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]

SI Id	Sequence	Requirement
TREA 14	18550	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 14	18560	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 14	18565	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 14	18570	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 14	18580	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 14	18590	Hood Certification and Evaluation: The Permittee must maintain the most current record of the hood evaluation and certification on site. The control device hood must be evaluated by a testing company as specified in Minn. R. 7011.0072, subp. 2(A) and must conform to the design and operating requirements listed in Minn. R. 7011.0072, subps. 2(B) and 3. The hood certification must address how cross-drafts are accommodated in the design (e.g., higher face velocity, oversized hood, etc.) and the Permittee must certify this as specified in Minn. R. 7011.0072, subps. 2 and 3. [Minn. R. 7007.0800, subp. 2(A), Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 14	19640	Annual Hood Evaluation: The Permittee must measure and record at least once every 12 months the fan rotation speed, fan power draw, or face velocity of each hood, or other comparable air flow parameter that was measured during the most recent hood certification to verify the hood design and operation parameters meet or exceed the parameters measured during the most recent hood evaluation conducted according to Minn. R. 7011.0072, subps. 2 & 3 as required by Minn. R. 7011.0072, subp. 4. The Permittee must maintain a copy of the annual evaluations on site for 5 years. [Minn. R. 7007.0800, subp. 2(A), Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 15	17610	The Permittee must vent emissions from EQUIs 27-32 and 49-52 to TREA 14, 15, 16, or 17 whenever EQUIs 27-32 and 49-52 operate, and operate and maintain TREA 14, 15, 16, or 17 at all times that any emissions are vented to TREA 14, 15, 16, or 17. The Permittee must document periods of non-operation of the control equipment TREA 14, 15, 16, or 17 whenever EQUIs 27-32 and 49-52 are operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 15	17615	If the Permittee replaces TREA 15, the replacement control must meet or exceed the control efficiency requirements of TREA 15 as well as comply with all other requirements of TREA 15. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 15	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 79 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 15	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 74 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
TREA 15	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 74 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 15	18510	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 15	18530	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 15	18550	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 15	18560	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 15	18565	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 15	18570	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 15	18580	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 15	18590	Hood Certification and Evaluation: The Permittee must maintain the most current record of the hood evaluation and certification on site. The control device hood must be evaluated by a testing company as specified in Minn. R. 7011.0072, subp. 2(A) and must conform to the design and operating requirements listed in Minn. R. 7011.0072, subps. 2(B) and 3. The hood certification must address how cross-drafts are accommodated in the design (e.g., higher face velocity, oversized hood, etc.) and the Permittee must certify this as specified in Minn. R. 7011.0072, subps. 2 and 3. [Minn. R. 7007.0800, subp. 2(A), Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 15	19640	Annual Hood Evaluation: The Permittee must measure and record at least once every 12 months the fan rotation speed, fan power draw, or face velocity of each hood, or other comparable air flow parameter that was measured during the most recent hood certification to verify the hood design and operation parameters meet or exceed the parameters measured during the most recent hood evaluation conducted according to Minn. R. 7011.0072, subps. 2 & 3 as required by Minn. R. 7011.0072, subp. 4. The Permittee must maintain a copy of the annual evaluations on site for 5 years. [Minn. R. 7007.0800, subp. 2(A), Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
TREA 16	17610	The Permittee must vent emissions from EQUIs 27-32 and 49-52 to TREA 14, 15, 16, or 17 whenever EQUIs 27-32 and 49-52 operate, and operate and maintain TREA 14, 15, 16, or 17 at all times that any emissions are vented to TREA 14, 15, 16, or 17. The Permittee must document periods of non-operation of the control equipment TREA 14, 15, 16, or 17 whenever EQUIs 27-32 and 49-52 are operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 16	17615	If the Permittee replaces TREA 16, the replacement control must meet or exceed the control efficiency requirements of TREA 16 as well as comply with all other requirements of TREA 16. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 16	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 79 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 16	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 74 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 16	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 74 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 16	18510	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 16	18530	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 16	18550	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 16	18560	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 16	18565	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 16	18570	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]

SI Id	Sequence	Requirement
TREA 16	18580	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 16	18590	Hood Certification and Evaluation: The Permittee must maintain the most current record of the hood evaluation and certification on site. The control device hood must be evaluated by a testing company as specified in Minn. R. 7011.0072, subp. 2(A) and must conform to the design and operating requirements listed in Minn. R. 7011.0072, subps. 2(B) and 3. The hood certification must address how cross-drafts are accommodated in the design (e.g., higher face velocity, oversized hood, etc.) and the Permittee must certify this as specified in Minn. R. 7011.0072, subps. 2 and 3. [Minn. R. 7007.0800, subp. 2(A), Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 16	19640	Annual Hood Evaluation: The Permittee must measure and record at least once every 12 months the fan rotation speed, fan power draw, or face velocity of each hood, or other comparable air flow parameter that was measured during the most recent hood certification to verify the hood design and operation parameters meet or exceed the parameters measured during the most recent hood evaluation conducted according to Minn. R. 7011.0072, subps. 2 & 3 as required by Minn. R. 7011.0072, subp. 4. The Permittee must maintain a copy of the annual evaluations on site for 5 years. [Minn. R. 7007.0800, subp. 2(A), Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 17	3100	The Permittee shall submit a notification of the date construction began: Due 30 calendar days after Date of Construction Start (or reconstruction). Submit the name and number of the Subject Item and the date construction began. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 17	3110	The Permittee shall submit a notification of the actual date of initial startup: Due 15 calendar days after Initial Startup Date. Submit the name and number of the Subject Item and the date of startup. Startup is as defined in Minn. R. 7005.0100, subp. 42a. The notification shall be submitted electronically on Form CS-02. [Minn. R. 7007.0800, subp. 16(L)]
TREA 17	3111	The Permittee shall submit a report: Due 30 calendar days after date of startup that certifies that the hood conforms to the requirements identified in the Hood Certification and Evaluation requirement in this permit. The Permittee shall submit the results of the evaluation and certification on form CR-02, along with any other information required by the forms for MPCA review. [Minn. R. 7007.0800, subp. 16(L)]
TREA 17	17610	The Permittee must vent emissions from EQUIs 27-32 and 49-52 to TREA 14, 15, 16, or 17 whenever EQUIs 27-32 and 49-52 operate, and operate and maintain TREAs 14, 15, 16, or 17 at all times that any emissions are vented to TREA 14, 15, 16, or 17. The Permittee must document periods of non-operation of the control equipment TREA 14, 15, 16, or 17 whenever EQUIs 27-32, 49-52 are operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 17	17615	If the Permittee replaces TREA 17, the replacement control must meet or exceed the control efficiency requirements of TREA 17 as well as comply with all other requirements of TREA 17. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 17	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 79 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 17	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 74 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 17	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 74 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
TREA 17	18510	Pressure Drop >= 0.1 and <= 6.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 17	18530	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 17	18550	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 17	18560	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 17	18565	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 17	18570	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 17	18580	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 17	18590	Hood Certification and Evaluation: The Permittee must maintain the most current record of the hood evaluation and certification on site. The control device hood must be evaluated by a testing company as specified in Minn. R. 7011.0072, subp. 2(A) and must conform to the design and operating requirements listed in Minn. R. 7011.0072, subps. 2(B) and 3. The hood certification must address how cross-drafts are accommodated in the design (e.g., higher face velocity, oversized hood, etc.) and the Permittee must certify this as specified in Minn. R. 7011.0072, subps. 2 and 3. [Minn. R. 7007.0800, subp. 2(A), Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 17	19640	Annual Hood Evaluation: The Permittee must measure and record at least once every 12 months the fan rotation speed, fan power draw, or face velocity of each hood, or other comparable air flow parameter that was measured during the most recent hood certification to verify the hood design and operation parameters meet or exceed the parameters measured during the most recent hood evaluation conducted according to Minn. R. 7011.0072, subps. 2 & 3 as required by Minn. R. 7011.0072, subp. 4. The Permittee must maintain a copy of the annual evaluations on site for 5 years. [Minn. R. 7007.0800, subp. 2(A), Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 18	17610	The Permittee must vent emissions from EQUI 33 to TREA 18 whenever EQUI 33 operates, and operate and maintain TREA 18 at all times that any emissions are vented to TREA 18. The Permittee must document periods of non-operation of the control equipment TREA 18 whenever EQUI 33 is operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]

SI Id	Sequence	Requirement
TREA 18	17615	If the Permittee replaces TREA 18, the replacement control must meet or exceed the control efficiency requirements of TREA 18 as well as comply with all other requirements of TREA 18. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 18	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 99 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 18	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 18	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 18	18510	Pressure Drop >= 0.1 and <= 7.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 18	18530	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 18	18550	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 18	18560	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 18	18565	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 18	18570	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]
TREA 18	19640	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]

SI Id	Sequence	Requirement
TREA 19	17610	The Permittee must vent emissions from EQUI 34 to TREA 19 whenever EQUI 34 operates, and operate and maintain TREA 19 at all times that any emissions are vented to TREA 19. The Permittee must document periods of non-operation of the control equipment TREA 19 whenever EQUI 34 is operating. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 19	17615	If the Permittee replaces TREA 19, the replacement control must meet or exceed the control efficiency requirements of TREA 19 as well as comply with all other requirements of TREA 19. Prior to making such a change, the Permittee must apply for and obtain the appropriate permit amendment, as applicable. If no amendment is needed for the replacement, the Permittee must submit an electronic notice to the Agency using Form CR-05. The notice must be received by the Agency seven working days prior to the commencement/start of replacement. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 19	18480	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter >= 99 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 19	18490	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 19	18500	The Permittee must operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron >= 93 percent control efficiency. [Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 19	18510	Pressure Drop >= 0.1 and <= 7.0 inches of water, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the follow up compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. If the recorded pressure drop is outside the required range, the emissions during that time must be considered uncontrolled until the pressure drop is once again within the required range. The period of time for which the pressure drop is considered out of range must be reported as a deviation. The Permittee must record the pressure drop at least once every 24 hours when in operation. [Title I Condition: Avoid major source under 40
TREA 19	18530	The Permittee must operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee must keep copies of the O & M Plan available onsite for use by staff and MPCA staff. [Minn. R. 7007.0800, subp. 14]
TREA 19	18550	Pressure Drop: Recordkeeping. The Permittee must record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 52.21(b)(1)(i) and Minn. R. 7007.3000]
TREA 19	18560	Corrective Actions: The Permittee must take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions must return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee must keep a record of the type and date of any corrective action taken for each filter. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 2(A), Minn. R. 7007.0800, subp. 5]
TREA 19	18565	Monitoring Equipment: The Permittee must install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation. [Minn. R. 7007.0800, subp. 4]
TREA 19	18570	The Permittee must calibrate or replace the pressure drop monitor at least once every 12 months and must maintain a written record of any action resulting from the calibration. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]

SI Id	Sequence	Requirement
TREA 19	19640	Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee must inspect the control equipment components. The Permittee must maintain a written record of these inspections. [Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5]

1. Facility and Emission Unit Identification

- **Facility Name:** Bora Pharmaceuticals Inc. (BPI)
- **AQ Permit Number:** 05301286-102
- **Agency Interest ID Number:** 89958
- **Emission Unit IDs:**

ID	Type	COMG	Description
EQUI 15	Spraying Equip	2: VOC CAP, 4: NESHAP GGG	FBP02 (solvent)
EQUI 16	Spraying Equip	2: VOC CAP, 4: NESHAP GGG	FBP01 (solvent)
EQUI 17	Spraying Equip	2: VOC CAP, 4: NESHAP GGG	FBP04 (solvent)
EQUI 19	Spraying Equip	2: VOC CAP, 4: NESHAP GGG	FBP05 (solvent)
EQUI 22	Spraying Equip	2: VOC CAP	TC01 (solvent)

- **Control Device ID:** TREA1 Regenerative Thermal Oxidizer 01 (RTO01)

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2. Regulatory Applicability

This CAM Plan is developed pursuant to:

- **Minnesota AQ Permit; Federal Part 70** - 05301286-102
- **40 CFR Part 64** – Compliance Assurance Monitoring
- **40 CFR Part 63, subp. GGG** – National Emission Standards for Pharmaceuticals Production (NESHAP GGG)

CAM Applicability Determination

The emission unit is subject to CAM because:

- It is located at a major source required to obtain a Part 70 permit.
- It is subject to a VOC emission limitation (cap).
- It uses a control device (RTO) to achieve compliance.
- Uncontrolled VOC emissions exceed major source thresholds.

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3. Emission Limit(s)

- **VOC Cap:** 90 tons per rolling 12-month period

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4. Control Device Description

- **Device Type:** Regenerative Thermal Oxidizer
- **Control Efficiency:** ≥ 98% VOC destruction efficiency
- **Key Operating Parameter:** Combustion chamber temperature

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5. Indicator(s) of Control Device Performance

Selected Indicator(s)

Combustion Temperature (Primary Indicator)

Indicator Justification

Combustion temperature is directly correlated with VOC destruction efficiency. Maintaining temperature above a minimum threshold ensures compliance with emission limits.

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6. Indicator Range(s) (Operating Limits)

- **Minimum Combustion Temperature:** Permit = ≥ 1668°F, 3-hr rolling average
    - Due to the abundant oxygen content of the process gas, complete combustion readily occurs when the ignition point is reached in the combustion chamber, which is typically in the 1500°F to 1600°F range.
    - Minimum was not set by the MPCA in the Notice of Compliance dated January 18, 2024, following the initial TREA1 Performance Test in June 2023.
    - Minmum was set during the 5-year permit renewal reissuance in May 2026
        - 1668°F was the average chamber temperature during the initial TREA1 Performance Test.
- BPI is working on implementing extra data points for the **Quality Improvement Plan (QIP) threshold:** An accumulation of excursions below the indicator range exceeding 5 percent of operating time for a reporting period excluding periods of startup, shutdown and malfunction.
- Established based on:
    - Performance testing
    - Manufacturer specifications
    - NESHAP GGG

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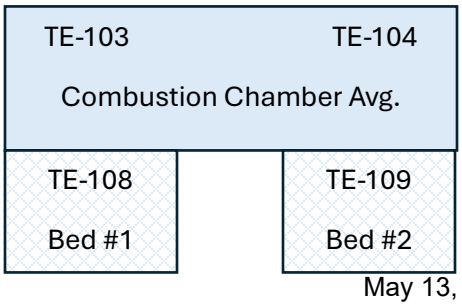
7. Monitoring Approach

Monitoring Equipment

- Continuous Temperature Monitoring System
    - Data Acquisition System (DAS) 001 (SAP Asset 16740): Johnson Controls Metasys Building Management System (BMS) stores data from the Adwest Programmable Logic Controller (PLC) located in the main RTO01 control panel (CP-101).
        - Monitor ID TE3 (TE-103) and TE4 (TE-104): 2 Chamber Temperature Thermocouples continuously monitor and record the combustion chambers.
        - 2 Media Bed Temperature Thermocouples continuously monitor and record the temperature in the media beds.
- RTO01 Control Panel/HMI Values
    - Chamber Temp #1 (TE-103)
    - Chamber Temp #2 (TE-104)
    - Chamber Avg. Temp
    - Bed #1 Temp (TE-108)
    - Bed #2 Temp (TE-109)



- BMS – Johnson Controls Metasys
    - Data Point = RTO01.Avg_Comb_Temp_3hr (Located in MG-SNE-4 – FC-1)
    - Alarms are trigggered at set points.

Monitoring Frequency

- Continuous monitoring – trend 10-minute values in the BMS.

Data Collection Procedures

- Record temperature continuously.
- Calculate rolling averages consistent with permit conditions.

Data Representativeness

- Permit Condition 5.28.7: The sensors are located in the combustion chamber as an integral part of the design. The minimum tolerance of the thermocouples is ± 4.5 degrees F or ± 0.75% (of the temperature measured in degrees Celsius), whichever is greater.

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8. Quality Assurance / Quality Control (QA/QC)

- Calibration of temperature sensors per manufacturer specifications – the thermocouples are replaced every 12 months.
- Preventive Maintenance (PM) Program:

PM or Calibration	SAP Equipment ID	Equipment Description	SAP ID	Frequency
Calibration	19272	Transmitter, LEL	11596	Annual
Calibration	19273	Transmitter, LEL	11597	Annual
PM	18481	Regenerative Thermal Oxidizer System	11997	Four Year
PM	18481	Regenerative Thermal Oxidizer System	11998	Annual
PM	18481	Regenerative Thermal Oxidizer System	11999	Semi-Annual
PM	18481	Regenerative Thermal Oxidizer System	12000	Quarterly
PM	18481	Regenerative Thermal Oxidizer System	12001	Weekly
Calibration	19450	High Inlet Static Pressure Switch	12113	Annual
Calibration	19451	Low Inlet Static Pressure Switch	12114	Annual
Calibration	19452	Low Bed Differential Pressure Switch 1	12115	Annual
Calibration	19453	Low Bed Differential Pressure Switch 2	12116	Annual
Calibration	19454	Chamber Temp Thermocouple TE-103	12117	Annual
Calibration	19455	Chamber Temp Thermocouple TE-104	12118	Annual
Calibration	19456	Bed Temp Thermocouple 1 (TE-108)	12119	Annual
Calibration	19457	Bed TempThermocouple 2 (TE-109)	12120	Annual
Calibration	19458	Combustion Air Inlet Thermocouple	12121	Annual
Calibration	19459	Inlet Temp Thermocouple	12122	Annual
Calibration	19460	Exhaust Temp Thermocouple	12123	Annual

- Permit Condition: 5.27.8

- Maintenance and Facilities verify the operation of the recording device at least once each operating day to verify it is working and recording properly. A log is maintained at the RTO01 (TREA 1) control panel.

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9. Excursion Definition

An **excursion** occurs when:

- Combustion temperature falls **below the established minimum limit.**

Excursions indicate potential control device performance issues, but are not automatically violations.

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10. Excursion Response Procedures

Upon detecting an excursion:

1. Investigate cause as soon as possible.
2. Take corrective action –refer to O&M Plan for RTO01 (TREA 1).
3. Document:
   - Cause of excursion
   - Corrective actions taken
   - Duration of event

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11. Performance Testing

- Initial startup of RTO01 (TREA) was on May 5, 2022
- Initial performance test on RTO01 (TREA 1) occurred on June 20, 2023.
  - First VOC and HAP was introduced during the Initial Performance Test
- Periodic testing as required by:
  - Permit Condition 6.42.1: Volatile Organic Compounds: The Permittee shall conduct a performance test due before 5/5/2027 and every 60 months thereafter to verify VOC control efficiency.

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12. Recordkeeping Requirements

Records Management Schedule/Retention Period: Retain all records at the stationary source, unless otherwise specified within this permit, for five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A). [Minn. R. 7007.0800, subp. 5(C)].

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13. Reporting Requirements/Compliance Certifications

- **Semi-Annual Deviation Reports – due July 30 and January 30**
  - Deviation Report (DRF-2 Form)

- **Annual Air Emissions Inventory – due April 1**
- **Air Permit Compliance Certification Report – due January 31**
  - Annual Compliance Certification Report (CR-04 Form)
- **AQ Annual Report due January 31**

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14. CAM Plan Approval and Revisions

- This CAM Plan is subject to approval by the permitting authority.
- Revisions required if:
  - Process changes occur.
  - Monitoring is found to be inadequate.
  - Regulatory requirements change.

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15. Integration with 40 CFR Part 63 Requirements

Limits and standards of NESHAP are exempt from CAM per 40 CFR § 64.2(b)(1)(i).
