

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Innophos, Inc.
Attn: Sean Schnepfer
612 East 138th Street
Chicago, Illinois 60827

Application No.: 72100820 I.D. No.: 031600AQW
Applicant's Designation: Waterway Plant Date Received: March 31, 2006
Subject: Sodium Phosphate Production
Date Issued: December 13, 2007 Expiration Date: December 13, 2012
Location: 612 East 138th Street, Chicago, Cook County, 60827

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

Sodium Hexametaphosphate Operations:

- Soda Ash Storage Operations and Tank/Hopper (659-026)
- Phosphoric Acid Operations and Storage Tank T-11(659-024), T-10(659-023) and T-70(659-022)
- Scrubber (569-002)
- Soda Ash Mixer (509-001) Controlled by C-2 Scrubber (569-016) (SC-1 Emitted through Stack S-1)
- Glass Furnace (549-002)
- Glass Cooler (549-003) Controlled by Dust Collector (569-004) or Rotoclone (569-001) and Scrubber (569-002)(SC-2 Emitted through Stack S-11)
- Prater Mill (639-001 and 639-002)
- Sodium Hexametaphosphate Weigh and Product Hoppers (659-025, 659-043, 659-044 and 659-045) Controlled by Dust Collector (569-004) or Rotoclone (569-001) and Scrubber (569-002) (Emitted through Stack S-11)
- Super Sack Packaging (520-010)
- Surge Hoppers (659-067 and 659-068) to Bagging Machine (520-017)

Blend Plant Operations:

- Bagging Machine (520-006) Controlled by Cyclone (569-034) then Dust Collector (569-033)
- Packaging Hopper (659-041) Controlled by Cyclone (569-034) then Dust Collector (569-033)
- Prater Mill (639-008)
- Munson Mixer (509-016) Controlled by Cyclone (569-034) then Dust Collector (569-033)
- Weigh Hopper (659-042)
- Lemon Juice Mix Tank (659-001)
- Blend Operations Dust Collector (569-033)

Boilers:

- Two Gas Fired Boilers (662-001 and 662-002)

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year of PM₁₀). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permits issued for this location.
- 2a. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
 - b. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 Ill. Adm. Code 212.301 and 212.314.
 - c. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
 - i. All normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.

- ii. All unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods.
 - iii. Crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations shall be sprayed with water or a surfactant solution, utilize choke-feeding or be treated by an equivalent method in accordance with an operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
- i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with this Subpart, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program,
- e. Pursuant to 35 Ill. Adm. Code 212.316(c), no person shall cause or allow fugitive particulate matter emissions from any roadway or parking area to exceed an opacity of 10 percent, except that the opacity shall not exceed 5 percent at quarries with a capacity to produce more than 1 million T/year of aggregate.
- f. Pursuant to 35 Ill. Adm. Code 212.316(f), unless an emission unit has been assigned a particulate matter, PM₁₀, or fugitive particulate matter emissions limitation elsewhere in this Condition or in 35 Ill. Adm. Code Part 212 Subparts R or S, no person shall cause or allow fugitive

particulate matter emissions from any emission unit to exceed an opacity of 20 percent.

- g. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 Ill. Adm. Code 212.321.
- h. Pursuant to 35 Ill. Adm. Code 212.324(b), except as otherwise provided in 35 Ill. Adm. Code 212.324, no person shall cause or allow the emission into the atmosphere, of PM₁₀, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period.
- i. Pursuant to 35 Ill. Adm. Code 212.324(d), the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this Condition is not a defense finding of a violation of the mass emission limits contained in 35 Ill. Adm. Code 212.324(b).
- j. Should this stationary source, as defined in 35 Ill. Adm. Code 212.700, become subject to the requirement to prepare and submit a contingency measure plan reflecting the PM₁₀ emission reductions as set forth in 35 Ill. Adm. Code 212.703, then the owner or operator shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented in accordance with 35 Ill. Adm. Code 212.704. The source shall comply with the applicable requirements of 35 Ill. Adm. Code Part 212, Subpart U.
- 3. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
- 4. Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hour) to exceed 200 ppm, corrected to 50 percent excess air.
- 5. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.

- 6a. Pursuant to 35 Ill. Adm. Code 212.324(f), for any process emission unit subject to 35 IAC 212.324(a), the owner or operator shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 Ill. Adm. Code 212.324 shall be met at all times. This Condition shall not affect the applicability of 35 Ill. Adm. Code 201.149. Proper maintenance shall include the following minimum requirements:
- i. Visual inspections of air pollution control equipment;
 - ii. Maintenance of an adequate inventory of spare parts; and
 - iii. Expeditious repairs, unless the emission unit is shutdown.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- c. The Permittee shall follow good operating practices for the scrubber, cyclone and dust collectors, including periodic inspection, routine maintenance and prompt repair of defects.
- d. Natural gas shall be the only fuel used in boilers, burners and space heaters.
- e. This permit is issued based on the source not having any storage piles.
- 7a. Emissions and operation of the following equipment at the sodium hexametaphosphate plant and blending operations shall not exceed the following limits:

<u>Equipment</u>	<u>Maximum Process Weight Rate of Dry Material (T/Yr)</u>	<u>Emissions Factor Lb PM/Ton of Process Weight Rate</u>	<u>Minimum Control Efficiency (% Wt.)</u>	<u>PM Emissions (T/Yr)</u>
<u>Sodium Hexametaphosphate Plant:</u>				
Soda Ash Storage Operations, Tank/Hopper (659-026)	17,800	10	95	4.5

<u>Equipment</u>	<u>Maximum Process Weight Rate of Dry Material (T/Yr)</u>	<u>Emissions Factor Lb PM/Ton of Process Weight Rate</u>	<u>Minimum Control Efficiency (% Wt.)</u>	<u>PM Emissions (T/Yr)</u>
<u>Sodium Hexametaphosphate Plant:</u>				
Phosphoric Acid Operations, Storage Tanks T-11(659-024), T-10(659-023) and T-70(659-022), Glass Furnace, Glass Cooler Controlled by Dust Collector and Scrubber, Prater Mill, Soda Ash Mixer with Scrubber, Weigh and Product Hoppers Controlled by Dust Collector and Scrubber Super Sack Packaging, Surge Hoppers on Bagging Machine and Dust Collector	33,000	20	95	16.5
<u>Blending Operations:</u>				
Bagging Machine, Packaging Hopper, Prater Mill, Munson Mixer, Weigh Hopper, Lemon Juice Mix Tank all Controlled by dust collector and cyclone	33,000	20	99	3.6
			Total:	24.6

These limits are based on maximum process weight rate and emissions were determined by using emission factor for similar operation and control efficiency.

- b. Emissions and operation of the natural gas-fired boilers, burners, and space heaters (combined) shall not exceed the following limits:

<u>Pollutant</u>	<u>Natural Gas Usage</u>		<u>Emissions</u>	
	<u>(mmscf/Month)</u>	<u>(mmscf/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
	62	365		
			<u>Emission Factor (Lb/mmscf)</u>	
Nitrogen Oxides (NO _x)			100	18.3
Carbon Monoxide (CO)			84	15.3
Particulate Matter (PM)			7.6	1.4
Volatile Organic Material (VOM)			5.5	1.0
			Totals	36.0

These limits are based on the maximum total firing rate (41.7 mmBtu/hour), maximum operating hours (8,760 hours/year), and standard AP-42 emission factors.

- c. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
8. This permit is issued based on the Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program (CAAPP) Permit.
- 9a. Pursuant to 35 Ill. Adm. Code 212.107, 212.109, and 212.110, testing for particulate matter emissions shall be performed as follows:
 - i. For both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, incorporated by reference in 35 Ill. Adm. Code 212.113, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This Condition shall not apply to 35 Ill. Adm. Code 212.301, pursuant to 35 Ill. Adm. Code 212.107.
 - ii. Except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, incorporated by reference in 35 Ill. Adm. Code 212.113, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged, pursuant to 35 Ill. Adm. Code 212.109.
 - iii. Measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E, pursuant to 35 Ill. Adm. Code 212.110(a).
 - iv. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4, pursuant to 35 Ill. Adm. Code 212.110(b).

- v. Upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA, pursuant to 35 Ill. Adm. Code 212.110(c).
- b. Testing required by Condition 9(a) shall be performed by a qualified independent testing service.
- 10a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of five years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- b. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- c. i. Pursuant to 35 Ill. Adm. Code 212.316(g), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm. Code 212.316 shall keep written records of the

application of control measures as may be needed for compliance with the opacity limitations of 35 Ill. Adm. Code 212.316.

- ii. Pursuant to 35 Ill. Adm. Code 212.316(g)(2), the records required under this 35 Ill. Adm. Code 212.316 shall include at least the following:
 - A. The name and address of the source;
 - B. The name and address of the owner and/or operator of the source;
 - C. A map or diagram showing the location of all emission units controlled, including the location, identification, length, and width of roadways;
 - D. For each application of water or chemical solution to roadways by truck: the name and location of the roadway controlled, application rate of each truck, frequency of each application, width of each application, identification of each truck used, total quantity of water or chemical used for each application and, for each application of chemical solution, the concentration and identity of the chemical;
 - E. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent and, if diluted, percent of concentration, used each day; and
 - F. A log recording incidents when control measures were not used and a statement of explanation.
- iii. The records required under 35 Ill. Adm. Code 212.316(g) shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
- d. Pursuant to 35 Ill. Adm. Code 212.324(g), sources subject to 35 Ill. Adm. Code 212.324 shall maintain the following records:
 - i. Written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with 35 Ill. Adm. Code 212.324(f).
 - ii. The owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction

and shall state what corrective actions were taken and what repairs were made.

- iii. A written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.
 - iv. Copies of all records required by 35 Ill. Adm. Code 212.324(g) shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.
 - v. The records required under 35 Ill. Adm. Code 212.324(g) shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.
- e. The Permittee shall maintain records of the following items so as to demonstrate compliance with the Conditions of this permit:
- i. Records addressing use of good operating practices for the scrubber, cyclone, and dust collectors:
 - A. Records for periodic inspection of the scrubber, cyclone, and dust collectors with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. Process weight rate of dry material (tons/month and tons/year);
 - iii. Natural gas consumption (mmft³/month and mmft³/year); and
 - iv. Monthly and annual CO, NO_x, PM, SO₂ and VOM emissions from the source with supporting calculations (tons/month, tons/year).
11. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA or USEPA request for records during the course of a source inspection.
12. If there is an exceedance of or deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance/deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the

relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

- 13a. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
 - b. Pursuant to 35 Ill. Adm. Code 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm. Code 212.316 shall submit to the Illinois EPA an annual report containing a summary of the written records specified under 35 Ill. Adm. Code 212.316(g).
 - c. Pursuant to 35 Ill. Adm. Code 212.316(g)(3), copies of all records required by 35 Ill. Adm. Code 212.316(g) shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA and shall be transmitted to the Illinois EPA by a company-designated person with authority to release such records.
 - d. Pursuant to 35 Ill. Adm. Code 212.316(g)(5), a quarterly report shall be submitted to the Illinois EPA stating the following: the dates any necessary control measures were not implemented, a listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of 35 Ill. Adm. Code 212.316. This report shall be submitted to the Illinois EPA thirty (30) calendar days from the end of a quarter.
 - e. Pursuant to 35 Ill. Adm. Code 212.324(g)(6), upon written request by the Illinois EPA, a report shall be submitted to the Illinois EPA for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made.
14. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

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and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this, please call Jocelyn Stakely at 217/782-2113.

Edwin C. Bakowski, P.E.
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:JRS:jws

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the sodium phosphate plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is handling 33,000 tons per year of sodium hexametaphosphate. The resulting maximum emissions are well below the levels (e.g., 100 tons per year of PM₁₀) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

E M I S S I O N S (Tons/Year)

<u>Equipment</u>	<u>VOM</u> <u>(T/Yr)</u>	<u>NO_x</u> <u>(T/Yr)</u>	<u>CO</u> <u>(T/Yr)</u>	<u>PM</u> <u>(T/Yr)</u>	<u>SO₂</u> <u>(T/Yr)</u>
Soda Ash Storage Operations, Tank/Hopper (659-026)	---	---	---	4.5	---
Phosphoric Acid Operations, Storage Tanks T-11(659-024), T-10(659-023) and T-70(659-022), Glass Furnace, Glass Cooler Controlled by Dust Collector and Scrubber, Prater Mill, Soda Ash Mixer with Scrubber, Weigh and Product Hoppers Controlled by Dust Collector and Scrubber	---	---	---	16.5	---
Super Sack Packaging, Surge Hoppers on Bagging Machine and Dust Collector	---	---	---	3.6	---
<u>Blending Operations:</u>	---	---	---	3.6	---
Bagging Machine, Packaging Hopper, Prater Mill, Munson Mixer, Weigh Hopper, Lemon Juice Mix Tank all Controlled by Dust Collector and cyclone	1.0	18.3	15.3	1.4	---
Natural gas-fired boilers, burners, and space heaters (combined)	1.0	18.3	15.3	1.4	---
Totals:	<u>1.0</u>	<u>18.3</u>	<u>15.3</u>	<u>26.0</u>	<u>0.0</u>

JRS:jws