

Learjet Inc. Tucson Terminal
Air Quality Permit #825

Technical Support Document

GENERAL INFORMATION

A. Source Information

- 1 Business Name: Learjet Inc.
- 2 Mailing Address: P.O. Box 11186, Tucson, AZ 85734-1186
- 3 Facility Address: 1255 E. Aero Park Blvd, Tucson, AZ 85756

B. Attainment Classification

The source is located in a portion of Pima County that is currently in attainment for all criteria air pollutants.

SOURCE DESCRIPTION

The site is located on the Southwest corner of Tucson International Airport. The facility consists of 15 buildings, a fueling ramp, a wastewater treatment plant, and a tank farm.

A. Process Description

Processes at the source consist of aerospace rework activities and supporting facilities. Aerospace rework activities include painting and depainting of aircraft, associated cleaning, aircraft interior rework (including wood furniture manufacturing), aircraft refueling and fuel storage, and process heating/drying.

Supporting facilities include combustion engines for backup power and fire control, combustion units for space heating, surface coating of metal parts, spray painting, abrasive blasting, facility maintenance (painting, cleaning and mechanical support) and fuel storage.

B. Air Pollution Control Equipment

Air pollution control equipment at the facility consists of particulate filters for enclosed areas where painting and depainting activities take place. Learjet does use APC for the abrasive blast units but the emissions from these units are not included in the potential to emit (PTE) as they are insignificant activities.

NON-APPLICABLE FEDERAL REGULATIONS

Noteworthy subparts of 40 CFR 60, 61 and 63 that do not apply to the source but potentially could be listed below, along with a brief statement in explanation.

1. 40 CFR 60 Subpart Dc, NSPS for Small Industrial-Commercial-Institutional Boilers: all of the units at the facility are less than 10 MMBtu/hr which makes this rule non-applicable. (60.40c)
2. 40 CFR 60 Subpart K, NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978: the age and size of the units at the facility makes this rule non-applicable. (60.110(c))

3. 40 CFR 60 Subpart Ka, NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after May 18, 1978 and prior to July 23, 1984: the age and size of the units at the facility make this rule non-applicable. (60.110a(a))
4. 40 CFR 60 Subpart Kb, NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984: the size and vapor pressure of the material stored in the units at the facility makes this rule non-applicable. (60.110b(a) and (b))
5. 40 CFR 60 Subpart IIII, NSPS for Stationary Compression Ignition Internal Combustion Engines; the date of manufacture for the existing compression ignition engines at the facility makes this rule non-applicable at the moment. Should Learjet purchase units in the future they will be subject to the rule.
6. 40 CFR 60 Subpart JJJJ, NSPS for Stationary Spark Ignition Internal Combustion Engines; the date of manufacture for the existing spark ignition engines at the facility makes this rule non-applicable at the moment. Should Learjet purchase units in the future they will be subject to the rule.
7. 40 CFR 63 Subpart EEEE, NESHAP for Organic Liquids Distribution (Non-Gasoline): only aviation gasoline is distributed at the source, which is excluded from this rule. Jet A is also excluded due to the low vapor pressure. (63.2406)
8. 40 CFR 63 MMMM, NESHAP for Surface Coating of Miscellaneous Metal Parts and Products: all activities potentially covered by MMMM are already covered by subparts JJ and GG, which exempts the activities from MMMM. (63.3881(c)(6) and (10))
9. 40 CFR 63 OOOO, NESHAP for Priming, Coating, and Dyeing of Fabrics and Other Textiles: the Permittee does not conduct activities covered by this subpart for commerce. (63.4281(c)(3))
10. 40 CFR 63 Subpart PPPP, NESHAP for Surface Coating of Plastic Parts and Products: activities covered by this subpart are already covered by subparts JJ and GG. (63.4481(c)(7) and (11))
11. 40 CFR 63 RRRR, NESHAP for Surface Coating of Metal Furniture: the Permittee only conducts activities covered by this subpart for maintenance and/or repair. (63.4881(c)(5))
12. 40 CFR 63 Subpart WWWW, NESHAP for Reinforced Plastic Composites Production: the Permittee does not conduct activities covered by this subpart that involve styrene. (63.5785(a))
13. 40 CFR 63 Subpart GGGGG, NESHAP for Site Remediation: the Permittee does not conduct activities covered by this subpart.
14. 40 CFR 63 Subpart PTTTT, NESHAP for Engine Test Cells/Standards: the Permittee does not conduct activities covered by this subpart.
15. 40 CFR 63 Subpart HHHHHH, NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources: the source is not considered an area source; therefore the rule does not apply.

PERMIT CONTENTS

A. Part A “General Conditions”:

No comments.

B. Part B “Specific Conditions”:

All conditions relating to chemical milling operations have been omitted from the permit. The Permittee does not engage in these activities and does not anticipate engaging in these activities in the future.

I. *Depainting Operations (Non-HAP Chemical Strippers)*

The Permittee does not use any depainting strippers that contain HAPs, and hence does not operate any control devices related to these solvents. All conditions related to HAP controls are therefore omitted from this section. Also, the Permittee depaints more than 6 aircraft in a year; hence, the related exemption is omitted.

All conditions found in this section are requirements directly from the CFR applicable, as cited in the permit. There are no additional Pima County Requirements added to the permit.

II. *Depainting Operations (Non-Chemical Technologies and Inorganic HAP)*

The Permittee does not use a waterwash system; related conditions have been omitted from this section. In addition, the Permittee depaints more than 6 aircraft in a year; hence, the related exemption is omitted.

References to organic HAP emissions are made in this section due to the structure of the CFR. The use of non-chemical technologies is one option for the Permittee to avoid the use of organic HAP containing strippers. The condition prohibiting the use of HAP containing strippers was included in this section to allow for minimal modification of the language and references taken directly from the CFR.

It is pertinent to note that controls (particulate filters for this source) need only be employed when the abrasive blasting has the potential to cause emissions of inorganic HAP. The Permittee has indicated that no abrasive blasting is currently used to depaint aircraft, but that it is a possibility in the future.

All conditions found in this section are requirements directly from the CFR applicable, as cited in the permit. There are no additional Pima County Requirements added to the permit.

III. *Hand-wipe Cleaning Operations*

All conditions found in this section are requirements directly from the CFR applicable, as cited in the permit. There are no additional Pima County Requirements added to the permit.

IV. *Spraygun Cleaning Operations*

A custom recordkeeping condition was added to the recordkeeping found in the CFR for these operations. IV.E.2.b.(iv) requires the Permittee to record whether or not a leak was discovered during a leak check. This provides positive confirmation that a leak check was performed, even if no leaks were discovered.

All other conditions found in this section are taken from the CFR directly, as cited in the permit.

V. *Flush Cleaning Operations*

All conditions found in this section are requirements directly from the CFR applicable, as cited in the permit. There are no additional Pima County Requirements added to the permit.

VI. *Uncontrolled Primer and Topcoat Application (Compliant Coatings w/o Averaging)*

All conditions found in this section are requirements directly from the CFR applicable, as cited in the permit. There are no additional Pima County Requirements added to the permit.

VII. *Controlled Inorganic HAP Primer and Topcoat Application (Compliant Coatings w/o Averaging)*

All conditions found in this section are requirements directly from the CFR, as cited in the permit. There are no additional Pima County Requirements added to the permit.

VIII. *Waste Storage and Handling Operations*

All conditions found in this section are requirements directly from the CFR applicable, as cited in the permit. There are no additional Pima County Requirements added to the permit.

IX. *Wood Furniture Manufacturing*

The Permittee is a major source of HAP and is therefore subject to NEHSAP Subpart JJ for qualified aircraft interior cabinet finishing and adhesive operations. In the previous permit renewal, the Permittee had limited their finishing material and adhesive usage for these operations to no more than 100 gallons/month throughput to that of an “incidental” wood component manufacturing level. As part of a minor revision – relocation project (application dated August 29, 2017), the Permittee anticipates finishing material and adhesive usage may increase beyond the 100 gallons/month limit. Therefore the NESHAP subpart JJ MACT requirements along with the attendant new permit conditions for Wood Furniture Manufacturing have been included in this Section.

In accordance with the “Background information Document to Final Standards”, ref. pages 27 and 28, Section 2-20 to 2-21¹, PDEQ determined that the wood component manufacturing facility consists of the Permittee’s total facility-wide collection of equipment, activities or both included in NESHAP Subpart JJ for which a relevant standard is established. PDEQ also determined that in accordance with the definitions in 40 CFR 63.2 “Incidental Wood Furniture Manufacturer”, and “Affected Source”, and 40 CFR 63.800(a) the facility is not considered an affected facility until the 100 gal/month threshold is exceeded. Upon exceeding a 12 consecutive month throughput of more than 1200 gallons per/year of finishing materials, the source becomes an affected source and subject to the NESHAP Subpart JJ requirements for a new affected source.

X. *Reserved for NESHAP Process Heaters*

All conditions found in this section are requirements directly from the CFR applicable, as cited in the permit. There are no additional Pima county requirements added to the permit.

¹ [National Emissions Standards For Hazardous Air Pollutants Wood Furniture Manufacturing Operations, Background Information Document For Final Standards](#)

XI. NESHAP Rice Requirements

All conditions found in this section are requirements directly from the CFR applicable, as cited in the permit. There are no additional Pima County Requirements added to the permit.

XII. Stationary Rotating Machinery

Particulate Matter Emissions Standard

PCC 17.16.340.C.1 limits the emissions of particulate matter from stationary rotating machinery. No monitoring/recordkeeping requirements for particulate matter have been included in the permit as allowable emissions are well above potential emissions. The chart in Figure 1, below, illustrates the fact.

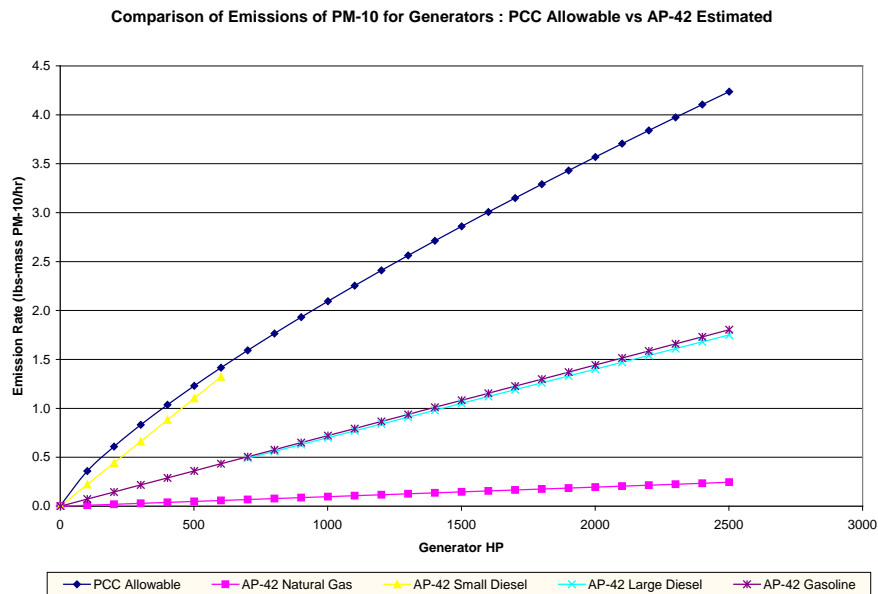


Figure 1) Comparative Chart of Allowable Particulate Emissions Under Pima County Code, Title 17 and Estimated Potential Emissions based on EPA AP-42 Estimates for Stationary Rotating Machinery. EPA AP-42 estimated emissions are demonstrably less than allowable emissions; and with the exception of small diesel engines, AP-42 estimated emissions are significantly less than the allowable emissions.² Therefore, it is not necessary to include the standard in the permit explicitly.

Mass emission testing to determine compliance with the particulate matter standard is not normally necessary as standard emission factors yield emission estimates of particulate matter that are far less than the standard allowed by the referenced equation. The Control Officer may require the Permittee to quantify its particulate matter emissions if the Control Officer has reasonable cause to believe a violation of a standard has been committed (PCC 17.20.010).

Opacity Emissions Standard:

To assure compliance with the opacity standards for stationary rotating machinery, the source is required to perform opacity checks on each piece of equipment quarterly. If abnormal emissions are noted, the source must take corrective actions. Records of these checks must be kept to document compliance with the monitoring requirements.

² At 599 hp the allowable emissions rate is 1.41 lb/hr while AP-42 estimates 1.32 lb/hr.

Sulfur Dioxide Emissions Standard:

The requirement in PCC 17.16.340.J to report daily periods when the fuel sulfur content of the fuel being fired exceeds 0.8% by weight has not been included in the permit as all fuel that is delivered to Pima County has an enforceable limit of 0.9% by weight. Any fuel over 0.8% but below 0.9% would not be an exceedance of any standard or limitation and so it would be burdensome for sources to report every time the fuel had a sulfur content above 0.8%. An excess emissions report would be submitted should the fuel exceed the 0.9% sulfur content standard. This permit will not allow the use of high sulfur diesel. Moreover, even though the sulfur content limit is 0.9% by weight, jet fuel, natural gas, gasoline and low sulfur diesel #2 delivered to Pima County consistently shows sulfur levels below this limit as shown in past records of fuel supplier specifications which verify sulfur content of the fuel fired. The limitations of XII.B.5 of the Specific Conditions, will ensure high sulfur fuel is not fired allowing the omission of rules PCC 17.16.340.H.

Compliance with the fuel limitation requirements of XII.B.4, of the Specific Conditions, shall ensure compliance with the Sulfur Dioxide Standards of PCC 17.16.340.F; which limit the emission of SO₂ to 1.0 pound per million BTU heat input, when burning low sulfur fuel. The definition of low sulfur fuel (PCC 17.04.340.A. "Low Sulfur Fuel") is fuel oil containing less than 0.9 percent sulfur by weight. EPA AP-42 Appendix A, page A-5 states the heating value of diesel fuel is 137,000 BTU per gallon. Thus, 1 million BTU of heat input is equivalent to 7.3 gallons of diesel. At 7.05 lbs per gallon, 51.47 lbs of diesel will produce 1 million BTU. At 0.9% 51.47 lbs of diesel contains 0.46 lbs of sulfur. Combined with Oxygen to form SO₂, and assuming 100% of the sulfur in the fuel forms SO₂, this would yield 0.92 lb SO₂ per 1MMBtu.³ Thus, low sulfur fuel oil will produce 0.92 lbs of SO₂ per million BTU of heat input. This is roughly 8% less than the prescribed 1.0 pound SO₂ per million BTU (PCC 17.16.340.F and 17.16.165.E). Likewise, distillate, residual, and other such fuel oils range from 0.84 to 0.94 lbs of SO₂ per million BTU. Thus, it is not necessary to include the standards in the permit explicitly but, by reference in Part C - Attachment 1 of the Permit.

Fuel Restriction & Sulfur Dioxide Emissions Standards:

Potential emissions calculations are based on the reported fuels fired in each piece of equipment. In order for the source to demonstrate compliance with emissions limitations, a record of fuel combusted in each piece of equipment has been incorporated. This record also requires the source document the sulfur content of the fuel combusted to demonstrate compliance with the fuel sulfur limitations.

Operational Hours Restriction:

A record of operational hours for each piece of equipment has been incorporated to demonstrate compliance with emissions limitations.

XIII. Fossil Fuel Fired Industrial Equipment

Particulate Matter Standard:

No monitoring, recordkeeping or testing associated with the particulate matter standard is required for the fossil fuel fired industrial equipment. Seeing as only natural gas is combusted in the equipment, and standard emissions factors for natural gas are well below permissible levels of particulate emissions, there is no need for the source to monitor the particulate matter emissions from the fossil fuel fired equipment. The figure overpage illustrates the point.

³ The atomic weight of SO₂ = 64; the atomic weight of S = 32. SO₂ = (S) x (SO₂/S);
(0.46 lb/MMBtu) x (64/32) = 0.92 lb SO₂

Comparison of Emissions of PM-10 for Boilers: PCC Allowable vs AP-42 Estimated

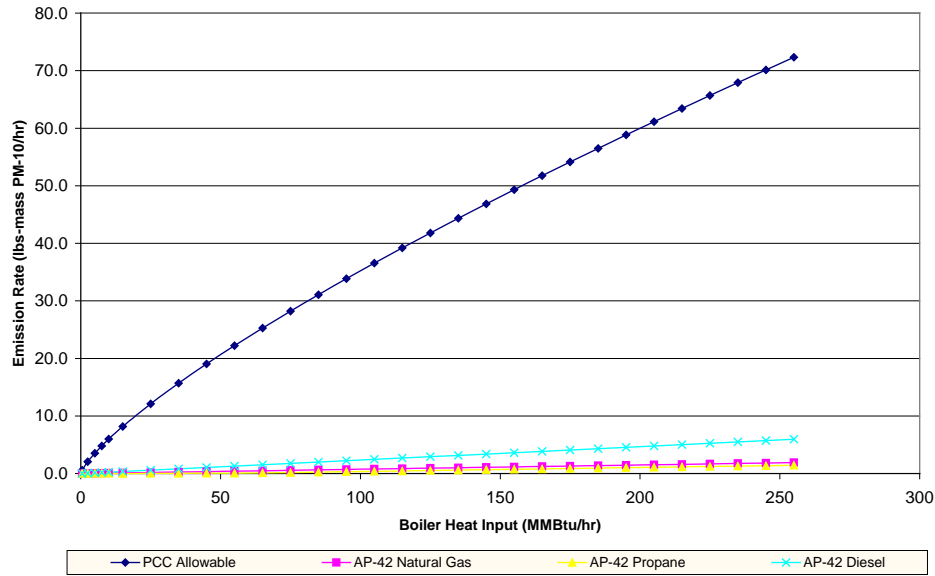


Figure 2) Comparative Chart of Allowable Particulate Emissions Under Pima County Code, Title 17, and Estimated Potential Emissions based on EPA AP-42 Estimates for External Combustion Sources. Allowable emissions are consistently over ten times estimated potential emissions. Therefore, it is not necessary to include the standard in the permit explicitly.

Mass emission testing to determine compliance with the particulate matter standard is not normally necessary as standard emission factors yield emission estimates of particulate matter that are far less than the standard allowed by the referenced equation. The Control Officer may require the Permittee to quantify its particulate matter emissions if the Control Officer has reasonable cause to believe a violation of a standard has been committed (PCC 17.20.010).

Fuel Restriction:

A restriction on allowable fuels is included in the permit, which specifies that only pipeline quality natural gas can be combusted in the applicable equipment. By design, the equipment at the source cannot combust any fuel aside from pipeline quality natural gas. Because of these design limitations, no associated recordkeeping is required for the fuel limitation. Combustion of pipeline quality natural gas can be verified by the presence of permanent plumbing of natural gas to the equipment. Recordkeeping of fuel combusted for natural gas combustion is also specifically not required under PCC 17.16.010.

Sulfur Content Restriction:

The only fuel combusted by the source for fossil fuel fired industrial equipment is natural gas. There is no sulfur content standard for natural gas fired equipment in PCC Title 17; hence, one does not appear in the permit conditions.

Opacity Emissions:

With only natural gas being combusted in the fossil fuel fired industrial equipment, no opacity checks are necessary. The facility wide visibility limiting standards still apply to the applicable equipment; but the standard is not included explicitly in this section due to the inherently low opacity emissions of natural gas combustion.

XIV. *Storage Vessels for Petroleum Liquids (Capacity < 40,000 Gallons)*

PDEQ Technical Policy 212 specifies that no monitoring/recordkeeping is required for petroleum storage tanks below 40,000 gallons capacity; regardless of vapor pressure. Therefore, there are no restrictions on petroleum liquids stored in these tanks; nor any associated monitoring/ recordkeeping required.

XV. *Surface Coating of Miscellaneous Metal Parts*

PDEQ recognizes that surface coating of miscellaneous metal parts represent a relatively minor source of air pollution at the source. There are no upper limits on the amount of coatings that can be used, so there is no need for a record of volumes used. MSDS information is readily available for all coatings. Therefore, there is no need for the Permittee to keep a record of coating content. PDEQ retains the authority to request information related to emissions at the department's discretion.

XVI. *Architectural Coatings*

PDEQ recognizes that architectural coatings represent a relatively minor source of air pollution at the source. There are no upper limits on the amount of coatings that can be used, so there is no need for a record of volumes used. MSDS information is readily available for all coatings. Therefore, there is no need for the Permittee to keep a record of coating content. PDEQ retains the authority to request information related to emissions at the department's discretion.

XVII. *Spray Painting*

There are no specific VOC content standards for spray painting operations in Title 17. Therefore, there is no need for the Permittee to keep a record of contents applied by spray painting. There are no upper limits on the amount of coatings that can be applied by spray painting, so there is no need for a record of volumes used. The Permittee is required to control overspray and may choose any available methods. Also, PDEQ recognizes that particulate emissions from spray painting overspray are a relatively minor source of emissions at the facility. Therefore, there is no need for specific monitoring or recordkeeping.

XIII. *Abrasive Blasting*

There are no specific standards for these operations. Therefore, there is no need for specific monitoring/ recordkeeping requirements.

XIX. *Visible Emission, Mass Rate Emissions Discharge Limiting and Odor Limiting Standards (Facility Wide)*

The visibility, mass rate emissions discharge limiting, and odor limiting standards apply to all operations and potential emission sources at the facility. The generic nature of the requirements preempts any specific monitoring/recordkeeping requirements. Therefore, no regular monitoring/ recordkeeping requirements are included.

C. Part C “Alternative Operating Scenarios” (AOS I)

AOSI. Averaged Primers and Topcoats:

AOSI.E.1.b Operating Scheme Log

A custom recordkeeping condition was included in this section that requires the Permittee to keep a log of which operating scheme the Permittee is operating under at all times, and the dates of transition between operating scenarios. This is required so that compliance with the different recordkeeping requirements of the alternating operating scenario can be assessed during an inspection. The log provides an unambiguous reference as to which operating scenario was utilized, and when. Without a record of this kind, compliance cannot be assessed. Such a record is required by PCC 17.12.180.A.11.a.

All other conditions found in this section are requirements directly from the CFR applicable, as cited in the permit. There are no additional Pima County Requirements added to the permit.

D. Attachment I “Applicable Regulations”:

No comments.

E. Attachment II “Equipment List”:

No comments.

F. Attachment III “Insignificant Activity List”:

No comments.

IMPACTS TO AMBIENT AIR QUALITY

Learjet’s potential and actual emissions are demonstrably lower than the PSD threshold of 250 tons per year for any single pollutant. The facility is not subject to PSD and is not required to analyze impacts to the ambient air.

PREVIOUS PERMIT CONDITIONS

Minor Permit Revision Application Received August 8, 2017 – Relocation Project

This minor permit revision application authorized the Permittee, to relocate a portion of the spray painting operations, and associated support activities, currently conducted in Building D of the TSC into larger workspaces in Building H of the TSC (the relocation project). Additionally, the application authorized the installation and operation of (1) new paint booth at Building H for a total of 3 at the new location (Paint Booth #1 - #3). The changes meet all the requirements for a minor permit revision outlined in Pima County Code (PCC) 17.12.255.

To summarize, the minor permit revision authorizes installation and operation of the relocation project which comprise the following changes to the permit:

1. the addition of three (3) make-up air units (MAUs);
2. the addition of five (5) dust collectors;
3. the increase in workspace areas and adding (1) new paint booth resulting in an increase in associated emissions;
4. the addition of new conditions for wood furniture manufacturing operations subject to NESHAP subpart JJ should the facility exceed the throughput limitation exempting the source as an incidental wood furniture (ICWF) manufacturer.
5. The incorporation of PCC 17.16.430.A.1 (SIP 332) and 17.16.030 (SIP Rule 344).

Permit Renewal Received September 16, 2016

During the previous permit renewal there were no physical changes or changes in the methods of operation for any equipment at the Learjet (Tucson Service Center) facility as reflected in the 2016 permit renewal application. Therefore, aside from incorporation of applicable major source boiler MACT requirements, Learjet proposes to maintain all other element and conditions of the previous permit.

Learjet's previous permit contained multiple alternate operating scenarios that covered all possible control strategies outlined in 40 CFR 63 Subpart GG. At the request of the Permittee, all unused alternate operating scenarios have been removed. The current permit reflects the state of operations at the facility at time of permit issuance.

Monitoring and recordkeeping for operations with only local rules applicable have been modified to reflect PDEQ's current approach to these operations.

POTENTIAL TO EMIT CALCULATIONS

Source	Uncontrolled Potential to Emit Emissions (tpy)							
	NO _x	CO	PM ₁₀	PM _{2.5}	SO ₂	VOC	HAP	CO _{2eq}
Existing Equipment Emissions (Previous Renewal)								
Boilers and Heaters	64.14	53.88	4.87	4.87	0.38	3.53	1.21	76,624
Engines	593.32	132.88	42.04	42.04	39.09	62.74	0.59	26,212
Fueling Operations	-	-	-	-	-	9.20	-	-
Storage Tanks	-	-	-	-	-	0.03	-	-
Aerospace Rework	-	-	8.73	8.73	-	125.26	25.89	-
Total	657	186.76	55.65	55.65	39.47	201	27.69	102,836
Title V Source Thresholds	100	100	100	100	100	100	25	100,000
<i>Above Title V thresholds?</i>	Yes	Yes	<i>No</i>	<i>No</i>	<i>No</i>	Yes	Yes	Yes
Federal NSR Thresholds	250	250	250	250	250	250	-	-
<i>Above Federal NSR thresholds?</i>	Yes	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

To limit emissions from combustion sources below PSD thresholds, Learjet has accepted an hourly limitation on the emergency diesel generators. All non-NSPS emergency diesel generators are limited to 500 hours of operation a year for maintenance and testing. NSPS and/ or NESHAP emergency diesel or natural gas generators are limited to 100 hours per year for maintenance and testing as required by federal regulations. All gasoline generators (emergency or not) do not have an hourly operation limitation. Operations of all natural gas fired equipment are not limited. Operational hours of emergency generators during emergencies is not limited.

Source	Controlled Potential to Emit Emissions (tpy)							
	NO _x	CO	PM ₁₀	PM _{2.5}	SO ₂	VOC	HAP	CO ₂ eq
Existing Equipment Emissions (Previous Renewal)								
Boilers and Heaters	64.14	53.88	4.87	4.87	0.38	3.53	1.21	76,624
Engines	87.47	23.87	6.14	6.14	5.64	22.43	0.07	4,188
Fueling Operations	-	-	-	-	-	9.20	-	-
Storage Tanks	-	-	-	-	-	0.03	-	-
Aerospace Rework	-	-	8.73	8.73	-	125.26	25.89	-
<i>Subtotal</i>	151.61	77.75	19.75	19.75	6.02	160.45	27.17	80,812
Minor Revision Received August 8, 2017 – Relocation Project								
Dust Collectors	-	-	5.03	5.03	-	-	-	-
Make-up Air Units	0.63	0.53	0.05	0.05	.0037	0.03	3.1x10 ⁻⁶	754
Aerospace Rework (Additional work area estimate)	-	-	0.10	0.10	-	1.41	0.29	-
<i>Subtotal</i>	0.63	0.53	5.18	5.18	.0037	1.45	0.29	754
Revision above significant emission threshold?	No	No	No	-	No	No	-	-
Significance Thresholds	40	100	15	40	-	40	-	-
<i>Total</i>	152.26	78.28	24.93	24.93	6.02	161.90	27.46	81,566
Title V Source Thresholds	100	100	100	100	100	100	25	100,000
<i>Above Title V thresholds?</i>	Yes	No	No	No	No	Yes	Yes	No
Federal NSR Thresholds ¹	250	250	250	250	250	250	-	-
<i>Above Federal NSR thresholds?</i>	No	No	No	No	No	No	No	No