

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

150 West Congress Street • Tucson, AZ 85701 • Phone: (520) 740-3340

AIR QUALITY OPERATING PERMIT

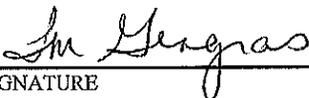
(As required by Title 17.12, Article II, Pima County Code)



THIS PERMIT ISSUED SUBJECT TO THE Specific Conditions and Attachments 1, 2, 3 & 4

PDEQ PERMIT NUMBER 2144 PERMIT CLASS III EXPIRATION DATE October 18, 2011

PERMIT ISSUED THIS NINETEENTH DAY OF OCTOBER TWO THOUSAND AND SIX


SIGNATURE

Tina Gingras Air Program Manager, PDEQ
TITLE

Permit Issued To:
Mission Linen Supply
Permit Number: 2144

TABLE OF CONTENTS

Permit Summary..... 3

Specific Conditions..... 4

 I. Applicability 4

 II. Emission Limits and Standards 4

 III. Monitoring Requirements 7

 IV. Recordkeeping Requirements 9

 V. Reporting requirements 10

 VI. Testing Requirements 10

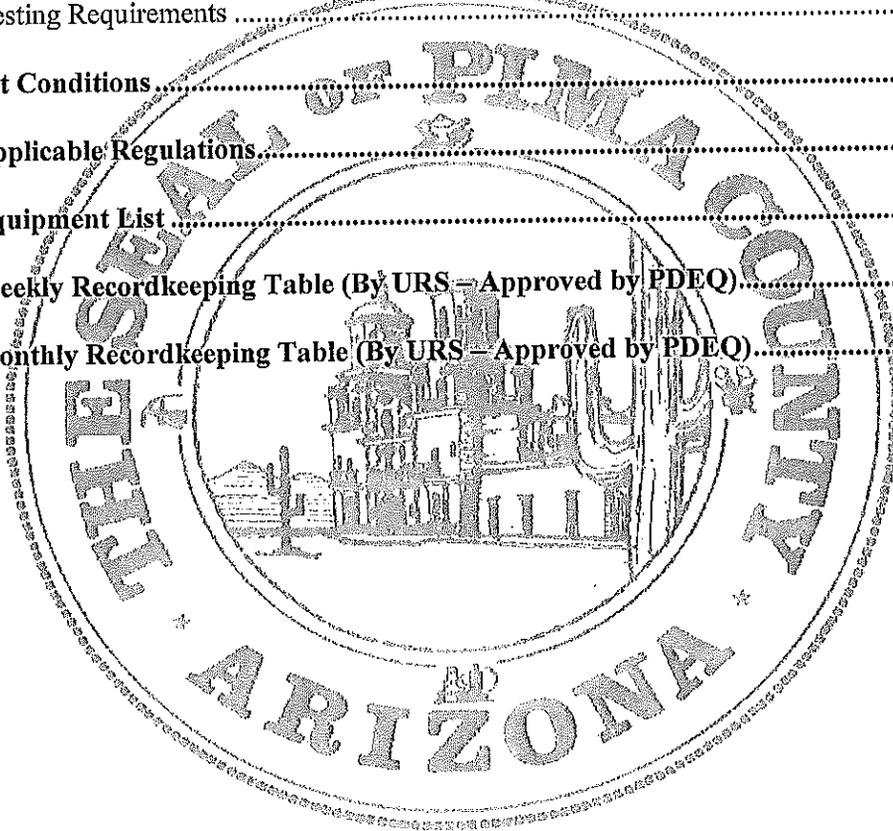
Additional Permit Conditions 12

Attachment 1: Applicable Regulations..... 13

Attachment 2: Equipment List 14

Attachment 3: Weekly Recordkeeping Table (By URS – Approved by PDEQ)..... 15

Attachment 4: Monthly Recordkeeping Table (By URS – Approved by PDEQ)..... 15



**Permit Issued To:
Mission Linen Supply
Permit Number: 2144**

SUMMARY

This operating permit is a new 5-yr permit issued to Mission Linen, the permittee. Mission Linen is a former dry cleaning facility that had tetrachloroethylene (PCE) spills which have migrated to underlying soils and may also have reached sewer lines through floor drains and sumps. PCE and its degradation products, trichloroethylene (TCE), cis-1,2-dichloroethylene (cis-1,2-DCE), and vinyl chloride have also dissolved within diesel fuel, which lies atop a shallow aquifer at this location. Mission Linen is currently permitted by the Arizona Department of Environmental Quality (ADEQ) to operate a Soil Vapor Extraction system (SVE) with Granular Activated Carbon beds (GAC) and permanganate-impregnated zeolite bead treatment (PIZB). Previous testing at the site demonstrates that the subsurface contamination does not contain gasoline range organic (GRO) compounds. Therefore, the Mission Linen site represents the reverse scenario as that seen for typical SVE applications (where a site is remediated for GRO and halogenated organic compounds are not anticipated), in that there is no GRO and halogenated organic compounds are included in the contamination being remediated. Therefore, the provisions of the general permit for SVE systems are not appropriate for this site.

To accelerate cleanup of the diesel fuel/PCE mixture from the subsurface, Mission Linen conducted a Multi Phase Extraction (MPE) pilot test in September 2003. The results showed that MPE was a feasible method of removing the diesel fuel/PCE mixture. The equipment to be permitted is a MPE remediation system to be used for the extraction of the mixture of diesel fuel, groundwater, and soil vapor from the subsurface through a series of wells. After the liquid/vapor mixture has been extracted, the liquid stream (diesel and water) will be separated from the vapor stream in the unvented Total Fluid Recovery Vessel (TFRV) upstream of the liquid ring blower. The vapor stream is pulled from the TFRV by the liquid ring blower. The liquid stream is transferred from the TFRV to an oil/water separator (OWS). The OWS is passively vented through a GAC bed (Exhaust Stream #1). The vapor stream from the TFRV passes through the liquid ring blower and volatile organic compounds are removed by three GAC beds, in series. The treated vapor stream then passes through the PIZB vessel and is emitted to the atmosphere (Exhaust Stream #2). The PIZB removes vinyl chloride that "rolls" through the GAC beds as it is displaced by PCE and TCE. Vinyl Chloride rolls through GAC as it is displaced by PCE and TCE.

The unit will be located at the Mission Linen Supply facility on South Park Avenue in Tucson, Arizona. This is the only piece of equipment that will be operated at the site.

As mentioned above, there are two types of pollution control equipment that will be utilized at the site.

1. Vapor phase Carbon Units (VPC) and Granular Activated Carbon beds (GAC) will be used to treat the Volatile Organic Compounds (VOCs), PCE, TCE and cis-1,2-DCE from both Exhaust Stream #1 and #2.
2. Permanganate-impregnated zeolite beads will be used as a polisher following the GAC beds to remove vinyl chloride from Exhaust Stream #2.

The source is a Class III synthetic minor stationary source due to the air pollution equipment that is used with the MPE system.

**Permit Issued To:
Mission Linen Supply
Permit Number: 2144**

Specific Conditions

[References are to Title 17 of the Pima County Code unless otherwise noted]

These Specific Conditions contain equipment specific requirements for the operation of a MPE system located at 301 South Park in Tucson AZ.

I. APPLICABILITY

A. Affected Emission Source or Process:

The affected emission source is a MPE to be operated at all times with a permanganate-impregnated zeolite bead bed and granular activated carbon (GAC) beds in Exhaust Stream #2 and a GAC bed in Exhaust Stream #1

B. Affected Emission Source Classification: Class III Synthetic Minor Stationary Source for HAPs and VOCs.

II. EMISSION LIMITS AND STANDARDS

A. Multi Phase Extraction System (MPE)

1. Particulate Matter Standard

The Permittee shall not discharge into the atmosphere in any one hour from any unclassified process source in total quantities in excess of the amount calculated by the following equation: [PCC 17.16.430.A.1.a]

$$E = 3.59Q^{0.62}$$

Where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour.

Q = the heat input in million Btu per hour.

2. Opacity Standard

The Permittee shall not cause or permit the effluent from a single emission point, multiple emission point, or fugitive emissions source to have an average optical density equal to or greater than 20%; [PCC 17.16.040.A]

3. Visibility Limiting Standard [PCC 17.16.050.D]

The Permittee shall not allow the diffusion of visible emissions including fugitive dust beyond the property boundary line within which the emissions become airborne without taking reasonably necessary and feasible precautions to control generation of airborne particulate matter. Sources may be required to cease temporarily the activity or operation which is causing or contributing to the emissions until reasonably necessary and feasible precautions are taken.

- a. This provision shall not apply when wind speeds exceed twenty-five (25) miles per hour (using the Beaufort Scale of Wind-Speed Equivalents, or as recorded by the National Weather Service). This exception does not apply if control measures have not been taken or were not commensurate with the size or scope of the emission source.
- b. This shall not apply to the generation of airborne particulate matter from undisturbed land.

4. Odor Limiting Standard

The Permittee shall not emit gaseous or odorous materials from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.

[PCC 17.16.430.D]

5. Where a stack, vent or other outlet is at such a level that fumes, gas, mist, odor, smoke, vapor or any combination thereof constituting air pollution are discharged to adjoining property, the control officer may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the owner or operator thereof to a degree that will adequately dilute, reduce or eliminate the discharge of air pollution to adjoining property.

[PCC 17.16.430.G]

[Material Permit Condition]

6. The Permittee is not authorized to use the MPE system when the nominal airflow rate through the soil vapor treatment train is greater than 150 scfm through the vapor/ liquid treatment train in order to guarantee the maximum concentrations for effective processing of the pollutants.

[PCC 17.16.430.G]

7. The Permittee is not allowed to directly discharge uncontrolled emissions into the atmosphere at any time.

[PCC 17.12.185.A.2]

B. Fuel Limitation

Other than electric energy for powering the blower, MPE and ancillary equipment, the Permittee shall not use any other fuel/ product without first applying for and receiving the appropriate revision pursuant to PCC 17.12.240, PCC 17.12.255, and PCC 17.12.260.

C. Operational Limitations

The Permittee shall operate the following air pollution controls at all times that liquid extraction is employed. Controls shall be fully operational upon startup of the MPE.

[Material Permit Condition]

1. Granular Activated Carbon, (GAC) & Permanganate-Impregnated Zeolite Bead Unit, (PIZB)

The Permittee shall use the three 2000-lb GAC units and PIZB equipment identified in Attachment 2 to absorb VOCs and HAPs contained in Exhaust Stream #2. The equipment shall be operated as follows:

[PCC 17.12.190.B][PCC 17.16.430.G]

[Federally Enforceable & Material Permit Condition]

- a. The PIZB unit shall be used at all times to remove vinyl chloride rolling through the GAC bed train in exhaust stream #2 only when the nominal flow rate is no greater than 150 scfm through the system.

- b. The PIZB unit shall be installed, maintained, and operated in accordance with the manufacturer's specifications.
- c. A flow meter shall be installed and maintained at the exit of exhaust stream #2 to measure and display the total flow rate.
- d. The three 2000 lb GAC units in exhaust stream #2 shall at all times be used when the MPE is in operation and the nominal flow rate is no more than 150 scfm through the system.
- e. Exhaust stream #2 stack emission limitations:
 - i. The Permittee shall limit the concentration of tetrachloroethene (PCE) to not more than 34.9 parts per million volume (ppmv).
 - ii. The Permittee shall limit the concentration of trichloroethene (TCE) to not more than 15 ppmv.
 - iii. The Permittee shall limit the concentration of vinyl chloride to not more than 0.7 ppmv.
 - iv. The Permittee shall limit the concentration of cis-1,2-dichloroethene (cis-1,2-DCE) to not more than 39 ppmv.
 - v. The Permittee shall limit the concentration of ethylbenzene to not more than 0.95 ppmv.
 - vi. The Permittee shall limit the concentration of total xylenes to not more than 1.7 ppmv.
 - vii. The Permittee shall limit the concentration of volatile fuel hydrocarbons to not more than 99 ppmv.
- f. The Permittee shall operate and maintain the vapor-phase GAC units in exhaust stream #2 pursuant to an Operations & Maintenance Plan (O & M Plan) approved by PDEQ.
- g. The GAC units shall be installed, maintained, and operated in accordance with the manufacturer's specifications.
- h. GAC unit change-out for exhaust stream #2 shall be performed within three weeks following initial discovery (based on weekly PID readings) of breakthrough on the first of the three GAC beds in series. If change-out cannot be performed within that timeframe, operation of the system shall be suspended until the change-out has been performed.

Breakthrough for II.C.1.h of the Specific Conditions shall be defined as the point at which the effluent concentration for the initial GAC bed, as measured with the photoionization detector (PID), approaches a value that is within 10% of the influent concentration (i.e., greater than 90% of the influent value).

- i. Upon discovery that the vinyl chloride concentration in the effluent of the PIZB (as determined through analysis of grab samples collected on the schedule set forth in Section III(C)(1)(c) of this permit) is equal to or greater than 0.63 ppmv (i.e., 90% of the emission limit set forth in this permit), operation of the MPE system shall be suspended until PIZB change-out has been performed.

2. Vapor Phase Carbon Unit (VPC) – Exhaust Stream #1

The permittee shall use the VPC identified in Attachment 2 to absorb VOCs and HAPs contained in Exhaust Stream #1. The equipment shall be operated as follows:[PCC 17.16.430.G][PCC 17.12.190.B]
[Federally Enforceable & Material Permit Condition]

- a. The 200 lb VPC in exhaust stream #1 shall at all times be used when the MPE is in operation, i.e. the permittee shall always operate the vapor phase GAC unit unless it is being replaced while the MPE system has been shut down as proposed in the application.
- b. The 200 lb VPC unit in exhaust stream #1 shall be specified to deliver no less than 90% control of VOCs.
- c. The Permittee shall operate and maintain the VPC in exhaust stream #1 pursuant to an Operations & Maintenance Plan (O & M Plan) approved by PDEQ.
- d. The VPC shall be installed, maintained, and operated in accordance with the manufacturer's specifications.
- e. VPC change-out for exhaust stream #1 shall be performed within three weeks following the initial discovery (based on weekly PID readings) that the effluent concentrations have reached the value of 5%, as proposed in the application, of the influent concentration as measured according to III.C.2 of the Specific Conditions.

III. MONITORING REQUIREMENTS

[PCC 17.12.185.A.3]

A. Multi Phase Extraction System

1. Particulate Matter Monitoring

Not required.

2. Opacity Standard Monitoring

See III.C.1.d.

3. Odor Monitoring & Discharge to adjoining property

See III.C.3.

B. Fuel Limitation

None. The Permittee need only show that electrical power is being used during inspections.

C. Operational Limitations

1. Granular Activated Carbon & Permanganate-Impregnated Zeolite Bead Unit (Exhaust Stream #2).

- a. The Permittee shall during system operation, take readings of the influent & effluent gas

concentrations for each GAC unit and the PIZB vessel using a handheld PID. The readings shall be taken once a week unless otherwise approved by the Control Officer.

- b. Within 10 hours of initial startup, the Permittee shall collect a grab sample of system effluent vapor. The sample shall be obtained during a period of operation that is representative of continuous operation of the system. The Permittee shall analyze the gas samples by using EPA's Compendium Method TO-15 (TO-15) for volatile organic compounds (VOCs). At the conclusion of the first day of operation, the system shall be shut down pending receipt of laboratory results indicating compliance with the emission limitations set forth in II.C.1.e of the Specific Conditions.
- c. Following the initial startup, the Permittee shall determine the concentrations of VOCs in the influent and effluent of the vapor abatement system by collecting grab samples according to the schedule below:
 - i. Daily for the first five days of continuous operation. This shall be referred to as schedule #1.
 - ii. Twice weekly for the next two weeks of operation. This shall be referred to as schedule #2.
 - iii. Weekly for the next four weeks of operation. This shall be referred to as schedule #3.
 - iv. Monthly thereafter. This shall be referred to as schedule #4.

If the grab samples show that the emission limitations set forth in II.C.1.e of the Specific Conditions were exceeded, the Permittee shall take corrective action to reduce the concentration of VOCs to the limits established by this permit. The Permittee shall return to TO-15 sampling frequency schedule #1 following the corrective action(s).

- d. The Permittee shall observe the stack of exhaust stream #2 of the MPE at least once each week for evidence of visible emissions. If the permittee sees emissions that, on an instantaneous basis, appears to exceed 20%, then the Permittee shall, if practicable, take a six-minute Method 9 observation of the plume. If the emissions are 20% or more, this shall be recorded and reported as an excess emission and a permit deviation.
2. VPC – Exhaust Stream #1.

The Permittee shall during system operation, take readings of the influent & effluent gas concentration for the VPC using a handheld PID. The readings shall be taken once a week unless otherwise approved by the Control Officer.
 3. The Permittee shall perform weekly checks on the MPE, VPC, PIZB and all the associated equipment and connections to ensure that there are no leaks, breaks or openings and that the equipment is operating according to the O & M Plan, manufacturer's specifications or good modern engineering practices.

IV RECORDKEEPING REQUIREMENTS

[PCC 17.12.185.A.4]

A. Multi Phase Extraction System

[PCC 17.12.185.A.4]

1. The Permittee shall use the tabular format represented in Attachment 3 to record the results of III.C.1.a and III.C.2 of the Specific Conditions as follows:
 - a. Date of PID readings;
 - b. Type of Air Pollution Control in use (VPC, GAC or PIZB);
 - c. The name of company or entity that performed the PID monitoring;
 - d. The exhaust stream number according to the permit application;
 - e. The concentration of gases in the influent gas stream (ppm_v);
 - f. The PID readings for the inlet and outlet of each GAC canister and the PIZB;
 - g. The flow rate upstream of the first GAC canister, Q_{process} (scfm); and
 - h. The exhaust gas flow rate, Q_{process} (scfm).
2. The Permittee shall use the tabular format represented in Attachment 4 to record the results of III.C.1.b & c of the Specific Conditions as follows:
 - a. Date of TO-15 sampling;
 - b. Type of air pollution control in use (VPC, GAC or PIZB);
 - c. The name of company or entity that performed TO-15 sampling;
 - d. The concentration of VOCs and HAPs upstream of the first GAC canister;
 - e. The concentration of VOCs and HAPs at the emission outlet;
 - f. The VOC and HAP removal efficiency of GAC canisters;
3. The Permittee shall record the results of III.C.1.d of the Specific Conditions in a log containing the date of the check, the person making the check, the specific stack observed, and whether visible emissions were observed. If visible emissions were observed, the Permittee shall include in the log entry any corrective action taken.
4. The Permittee shall record the results of III.C.3 of the Specific Conditions in a log containing the date of the check, the person making the check and the specific equipment observed. If deviations from normal operations are observed, the Permittee shall include in the log entry any corrective action taken.
5. The Permittee shall display the name, address and phone number of a contact person at the site of the MPE in a manner as to be clearly visible and accessible.

B. Records For The Facility

[PCC 17.12.185.A.4]

1. All required records shall be maintained either in an unchangeable electronic format or handwritten logbook of indelible ink for a minimum period of five (5) years after the date of such record and shall be made readily available to the Department upon request for inspection.
2. Location of Records. The Permittee shall retain all records relating to this permit, and a copy of the permit at the permit site or main Tucson office. The Permittee shall comply with the permit posting requirements of PCC 17.12.080 unless otherwise allowed by the Control Officer. All records shall be maintained in accordance with the requirements of PCC 17.12.180.A.4.b.

V. REPORTING REQUIREMENTS

[PCC 17.12.185.A.5 & 17.12.185.D.3.d]

A. Multi Phase Extraction System

1. A written report of the results of all sampling tests required for the first month of operation under III.C.1.b of the Specific Conditions shall be submitted to the Control Officer within 60 days of sampling. The report shall be submitted in accordance with the Arizona Testing Manual and PCC 17.12.050.B and shall use tabular format of Attachment 3.

Reports of all other sampling not requested above shall be kept on site or at the main Tucson office and not submitted unless requested by the Control Officer.

2. The Permittee shall submit an O & M Plan within 60 days of permit issuance consisting of:
[PCC 17.12.030]
 - a. The process operating parameters and limits,
 - b. Maintenance procedures and schedules, and
 - c. Documentation methods necessary to demonstrate proper operation and maintenance of the air pollution control system.

B. Emissions Inventory Reporting. [PCC 17.12.320]

The Permittee shall complete and submit to the control officer, when requested, an annual emissions inventory questionnaire pursuant to 17.12.320 of the Pima County Code.

VI. TESTING REQUIREMENTS

[A.R.S. §49-480.B and PCC 17.12.185.A.3.a]

For purposes of District enforcement, these test methods shall be used, provided that for the purpose of establishing whether or not the facility has violated or is in violation of any provision of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed.

- A. Should the Permittee desire to test, or be required to test the equipment to demonstrate compliance with the limits in this permit, the Permittee shall contact the control officer for testing requirements.
[PCC 17.20.010.B]

B. PID Calibration Tests. [PCC 17.20.010.B]

1. Prior to start up, the Permittee shall perform a calibration test of the PID, record the results in a log as described in B.V.B.2 of the Specific Conditions below and submit the results to the Control Officer.
2. After start-up, the Permittee shall perform a calibration test of the PID bi-weekly (every two weeks) to ensure that it is accurately indicating VOC concentration. The results shall be recorded in a log containing the date of the test, the person making the test and the deviation from normal that is observed. If no deviation from normal is observed, this shall be recorded in the log. If deviations from normal are observed, the Permittee shall include in the log entry any corrective action taken.

C. The Permittee shall use the following EPA approved test methods to conduct performance tests for the specified pollutants:

1. Particulate Matter. EPA Reference Method 5 shall be used to monitor compliance with II.A.1 of the Specific Conditions when mass emission testing is required by the Control Officer.
[PCC 17.20.010.B]
2. EPA Reference Method 9 shall be used to monitor compliance with II.A.2 of the Specific Conditions and when an opacity test is required by the Control Officer.
3. EPA Compendium Method TO-15 for VOCs and HAPs, including halogenated organic compounds.
4. The Permittee may submit an alternate and equivalent test method that is listed in 40 CFR Subpart 60, Appendix A, to the Control Officer in a test plan, for approval by the Control Officer.



ADDITIONAL PERMIT CONDITIONS

I. COMPLIANCE WITH PERMIT CONDITIONS

[PCC 17.12.185.A.7.a & b]

- A. The Permittee shall comply with all conditions of this permit including all applicable requirements of Arizona air quality statutes and the air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
- B. The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. The report shall be in 2 parts as specified below: [PCC 17.12.185.A.5 & PCC 17.12.040]
- 1 Notification by telephone or facsimile within 24 hours of the time the Permittee first learned of the occurrence of excess emission that includes all available information pursuant to PCC 17.12.040.B. To report excess emissions call **520-740-3340** or fax to **520-882-7709**.
 - 2 Detailed written notification by submission of an excess emissions report within 72 hours of the notification in I.B.1 above. **Send to PDEQ 150 W. Congress St., Tucson, Arizona 85701.**
- C. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- D. The permit does not convey any property rights of any sort, or any exclusive privilege to the permit holder.
- E. The Permittee shall pay fees to the Control Officer pursuant to PCC 17.12.510. [PCC 17.12.185.A.9 & PCC 17.12.510]

II. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE

[PCC 17.12.185.A.7.c]

The permit may be revised, reopened, revoked and reissued, or terminated for cause pursuant to PCC 17.12.270. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

III. DUTY TO PROVIDE INFORMATION

[PCC 17.12.165.G & PCC 17.12.185.A.7.e]

- A. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records to the Control Officer along with a claim of confidentiality.
- B. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

IV. SEVERABILITY CLAUSE

[PCC 17.12.185.A.6]

The provisions of this permit are severable. If any provision of this permit is held invalid, the remainder of this permit shall not be affected thereby.

Attachment 1: APPLICABLE REGULATIONS
Air Quality Control Permit No. 2144
For
Mission Linen Supply

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE

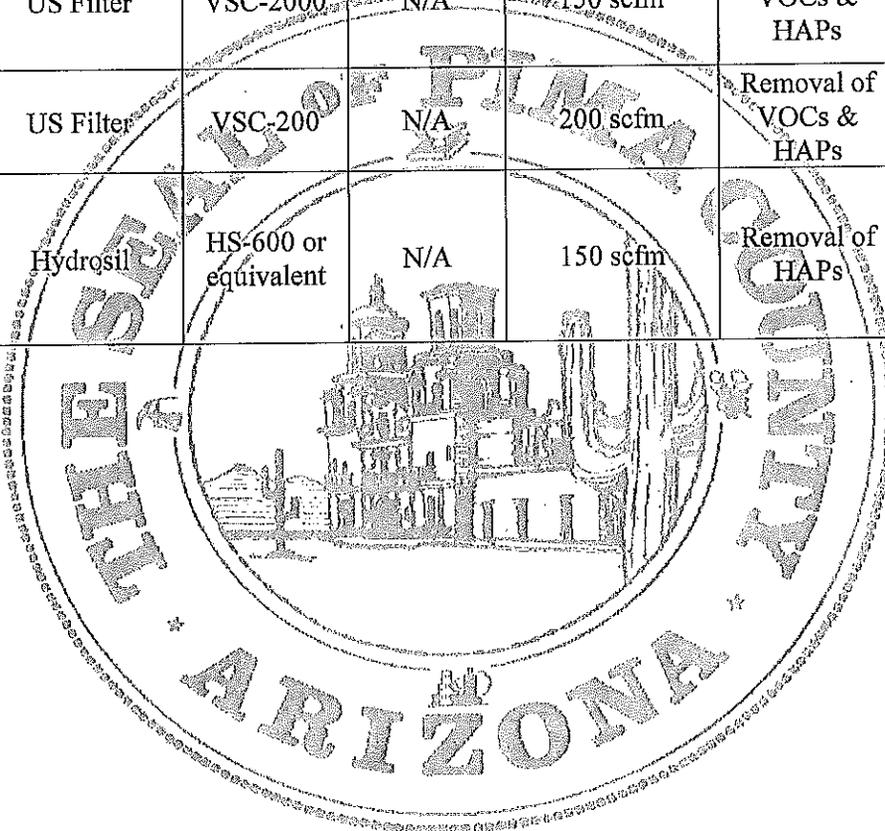
Pima County Code (PCC) Title 17, Chapter 17.16:

- 17.16.010 Local Rules and Standards; Applicability of more than one Standard
- 17.16.040 Standards and Applicability (Includes NESHAP)
- 17.16.050 Visibility Limiting Standard
- 17.16.130 Applicability
- 17.16.430 Standards of Performance for Unclassified Sources
- 17.20.010 Source Sampling, Monitoring, and Testing



Attachment 2: EQUIPMENT LIST
Air Quality Control Permit No. 2144
For
Mission Linen Supply

EQUIPMENT TYPE	EQUIPMENT NAME	MODEL	SERIAL NUMBER	MAXIMUM RATED CAPACITY	PRIMARY USE	FUEL TYPE
Multi Phase Extraction System	ES & S	To Be Supplied	To Be Supplied	1000 acfm LRP Blower	Liquid & Vapor Extraction	N/A
Three 2000 lb Granular Activated Carbon Units	US Filter	VSC-2000	N/A	150 scfm	Removal of VOCs & HAPs	N/A
200 lb Vapor Phase Carbon Unit	US Filter	VSC-200	N/A	200 scfm	Removal of VOCs & HAPs	N/A
500 lb Permanganate-Impregnated Zeolite Bead Unit	Hydrosil	HS-600 or equivalent	N/A	150 scfm	Removal of HAPs	N/A



Attachment 3: WEEKLY RECORDKEEPING TABLE (Use URS' proposed table -- Approved by PDEQ)

Attachment 4: MONTHLY RECORDKEEPING TABLE (Use URS' proposed table - Approved by PDEQ)



