

**AIR POLLUTION CONTROL
PERMIT TO CONSTRUCT**

Pursuant to Chapter 23.1-06 of the North Dakota Century Code, and the Air Pollution Control Rules of the State of North Dakota (Article 33.1-15 of the North Dakota Administrative Code), and in reliance on statements and representations heretofore made by the owner designated below, a Permit to Construct is hereby issued authorizing such owner to construct and initially operate the source unit(s) at the location designated below. This Permit to Construct is subject to all applicable rules and orders now or hereafter in effect of the North Dakota Department of Environmental Quality (Department) and to any conditions specified below:

I. General Information:

- A. **Permit to Construct Number:** ACP-18197 v1.0
- B. **Source:**
 - 1. **Name:** Drayton Sugar Beet Processing Facility
 - 2. **Location:** County Highway 44
Drayton, Pembina County, ND
NE ¼, SE ¼, T159N, R51W
 - 3. **Source Type:** Sugar Beet Processing Facility
 - 4. **New Facility Emission Units:**

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Package boiler with a nominal heat input capacity of 359 x 10 ⁶ Btu/hr fired on natural gas (NSPS Db, MACT 5D)	35	32	Ultra low NO _x burner (ULNB) and good combustion practices
Pulp dryer No. 2, Promill direct-fired triple-pass rotary dryer with a nominal process rate of approximately 65 tons/hr pressed pulp, primarily coal-fired (8.6 tons/hr) with natural gas as a supplemental fuel (40 x 10 ⁶ Btu/hr)	36	33	Cyclone, wet scrubber, good combustion practices

5. Modified Facility Emission Units: Upon the issuance date of this permit, the emission units included in Permit to Construct (PTC) No. ACP-17815 v1.0 (formerly designated as PTC No. PTC17001) are rescinded in their entirety and replaced with the following:

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Babcock and Wilcox coal-fired spreader stoker boiler with a nominal heat input capacity of 392×10^6 Btu/hr and a nominal steam load capacity of 300,000 lbs/hr ^B	1	1	Multiclone and Electrostatic Precipitator
Pulp dryer No. 1, Stearns-Roger 12'0" x 56' rotary, direct-fired, traveling grate pulp dryer, with a nominal process rate of approximately 65 tons/hr. The Combustion Engineering coal-fired Inseco furnace has a nominal heat input capacity of 125×10^6 Btu/hr.	4	4	Multiclone
Dry pulp belt conveyors with a nominal capacity of 16.8 tons/hr and pellet mill area	9	9	Bagfilter
Dry pulp bucket elevator with a nominal capacity of 16.8 tons/hr which is part of the pulp conveyors	11		
Vertical shaft lime kiln with a nominal capacity of 500 tons/day of lime and a maximum heat input capacity of 84.7×10^6 Btu/hr fired on natural gas	28	27a ^A (balance vent)	Inherent process controls / good combustion practices
		27b ^A (combined carbonation vent)	
		27c ^A (CO ₂ pressure vent)	
		27d (startup/emergency vent)	
Sugar dryer/granulator with a maximum rated capacity of 100 tons/hr	29	28	Baghouse

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
	30	29	Good engineering practices
Pellet Mill/Cooler System: Pulp Pellet Mill Nos. 1, 2 and 3 each with a nominal capacity of 16 tons/hr and Pellet Cooler with a nominal capacity of 30 ton/hr	31	30	Cyclone
	33		
	34		

^A Emissions from EU 28 are vented to a packed tower scrubber gas conditioning system as an inherent part of the process. The exhaust gases are then vented to carbonation tanks in the carbonation process. A portion of the exhaust gases are vented to a balance vent and a CO₂ pressure relief vent prior to the carbonation process.

^B The boiler (EU 1) is not being modified as part of this project; however, the emission limits established by 40 CFR 63, Subpart DDDDD are incorporated into this permit.

6. Removed Facility Emission Units: Upon the issuance date of this permit the list of emission units to be removed from service included in PTC No. ACP-17815 v1.0 (formerly designated as PTC No. PTC17001) are rescinded in their entirety and replaced with the following:

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Pulp dryer No. 2, Stearns-Roger 10'6" x 48' rotary, direct-fired, traveling grate pulp dryer, with a nominal process rate of approximately 33.8 tons/hr. The Combustion Engineering coal-fired Inseco furnace has a nominal heat input capacity of 100 x 10 ⁶ Btu/hr.	3	3	Multiclone
Lime mixing tank	5	5	Wet scrubber
Lime mixing tank	24		
Pellet mill no. 1	6	6	Cyclone
Two California pellet mills (CPM) with two CPM pellet coolers, Model 2GA3, with a nominal 5 tons/hr capacity each	7	7	One cyclone for each cooler
	8	8	

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Sugar dryer/Link Belt Roto-Louvre sugar granulator	12	12	Roto-clone
Belgian lime kiln with a nominal 15.7 tons/hr capacity of limestone, coke & anthracite coal	13	13a-f	Cyclone
Pulp pellet mill/pellet cooler	22	22	Cyclone
Lime slaker with a nominal process rate of 8.1 tons of lime per hour	26	25	None
Direct-fired pulp dryer with a nominal process rate of approximately 110 tons/hour of pressed pulp. The coal-fired furnace has a rated heat input of approximately 230 x 10 ⁶ Btu/hr	27	26	Cyclone and wet scrubber

C. Owner/Operator (Permit Applicant):

1. Name: American Crystal Sugar Company
2. Address: 101 N. Third Street
Moorhead, MN 56560-1990
3. Application Date: August 23, 2022 (amendment to PTC No. ACP-17815 v1.0)
December 28, 2022 (expansion)

II. Conditions:

This Permit to Construct allows the construction and initial operation of the above-mentioned new or modified equipment at the source. The source may be operated under this Permit to Construct until a Permit to Operate is issued unless this permit is suspended or revoked. The source is subject to all applicable rules, regulations, and orders now or hereafter in effect of the North Dakota Department of Environmental Quality and to the conditions specified below.

- A. **Emission Limits:** Emission limits from the operation of the source unit(s) identified in Item I.B of this Permit to Construct (hereafter referred to as "permit") are as follows. Source units not listed are subject to the applicable emission limits specified in the North Dakota Air Pollution Control Rules.

Emission Unit Description	EU	EP	Pollutant / Parameter	Emission Limit ^A
Babcock and Wilcox coal-fired spreader stoker boiler with a nominal heat input capacity of 392 x 10 ⁶ Btu/hr and a nominal steam load capacity of 300,000 lbs/hr	1	1	PM	0.04 lb/MMBtu (filterable only) ^D
			CO	160 ppm @ 3% O ₂ and 0.133 lb/MMBtu ^D
			HCl	0.022 lb/MMBtu ^D
			Hg	5.7 x 10 ⁻⁶ lb/MMBtu ^D
			SO ₂	3.0 lb/MMBtu heat input
			Opacity	20% ^B
Pulp dryer No. 1, Stearns-Roger 12'0" x 56' rotary, direct-fired, traveling grate pulp dryer, with a nominal process rate of approximately 65 tons/hr. The Combustion Engineering coal-fired Inseco furnace has a nominal heat input capacity of 125 x 10 ⁶ Btu/hr.	4	4	PM	48 lb/hr and 0.74 lb/ton pressed pulp processed, 3-hr avg. (filterable only)
			PM ₁₀	88.8 lb/hr and 1.37 lb/ton pressed pulp processed, 3-hr avg. (filterable and condensable)
			PM _{2.5}	81.6 lb/hr and 1.26 lb/ton pressed pulp processed, 3-hr avg. (filterable and condensable)
			SO ₂	46.6 lb/hr and 0.72 lb/ton pressed pulp processed, 3-hr avg.
		SO ₂	3.0 lb/MMBtu heat input	

Emission Unit Description	EU	EP	Pollutant / Parameter	Emission Limit ^A
			NO _x	54.3 lb/hr and 0.84 lb/ton pressed pulp processed, 3-hr avg.
			CO	455.0 lb/hr and 7.0 lb/ton pressed pulp processed, 3-hr avg.
			VOC	78.0 lb/hr and 1.20 lb/ton pressed pulp processed, 3-hr avg.
			Opacity	20% ^B
Dry pulp belt conveyors with a nominal capacity of 16.8 tons/hr and pellet mill area	9	9	PM/PM ₁₀	0.30 lb/hr and 0.005 gr/dscf, 3-hr avg. (filterable only)
Dry pulp bucket elevator with a nominal capacity of 16.8 tons/hr which is part of the pulp conveyors	11		Opacity	20% ^B
Vertical shaft lime kiln with a nominal capacity of 500 tons/day of lime and a maximum heat input capacity of 84.7 x 10 ⁶ Btu/hr fired on natural gas	28	27a-d	PM/PM ₁₀	10.7 lb/hr and 0.53 lb/ton lime produced, 3-hr avg. (filterable only)
			PM _{2.5}	6.63 lb/hr and 0.32 lb/ton of lime produced, 3-hr avg. (filterable and condensable)
			SO ₂	3.73 lb/hr and 0.18 lb/ton lime produced, 3-hr avg.
			NO _x	26.8 lb/hr and 1.29 lb/ton lime produced, 3-hr avg.
			CO	521 lb/hr and 25.0 lb/ton lime produced, 3-hr avg.
			VOC	2.73 lb/hr and 0.13 lb/ton lime produced, 3-hr avg.
			Opacity	20% ^B
Sugar dryer/granulator with a maximum rated capacity of 100 tons/hr	29	28	PM/PM ₁₀	2.20 lb/hr and 0.022 lb/ton sugar processed, 3-hr avg. (filterable only)

Emission Unit Description	EU	EP	Pollutant / Parameter	Emission Limit ^A
			PM _{2.5} Opacity	0.50 lb/hr and 0.005 lb/ton sugar processed, 3-hr avg. (filterable only) 20% ^B
Eberhardt lime slaker with a capacity of 500 tons/day of calcined lime	30	29	PM/PM ₁₀ PM _{2.5} Opacity	3.33 lb/hr and 0.16 lb/ton lime processed, 3-hr avg. (filterable only) 1.24 lb/hr and 0.06 lb/ton lime processed, 3-hr avg. (filterable and condensable) 20% ^B
Pellet Mill/Cooler System: Pulp Pellet Mill Nos. 1, 2 and 3 each with a nominal capacity of 16 tons/hr and Pellet Cooler with a nominal capacity of 30 ton/hr	31	30	PM/PM ₁₀	1.5 lb/hr and 0.005 gr/dscf, 3-hr avg. (filterable only)
	33		PM _{2.5}	0.35 lb/hr and 0.001 gr/dscf, 3-hr avg. (filterable and condensable)
	34		Opacity	10%
Package boiler with a nominal heat input capacity of 359 x 10 ⁶ Btu/hr fired on natural gas	35	32	PM/PM ₁₀ /PM _{2.5} SO ₂ NO _x CO VOC GHG Opacity	0.0075 lb/MMBtu, 3-hr avg. (filterable only) 0.0006 lb/MMBtu, 3-hr avg. 0.020 lb/MMBtu (7.2 lb/hr), 3-hr avg. ^C 0.037 lb/MMBtu (13.3 lb/hr), 3-hr avg. 0.0054 lb/MMBtu (1.9 lb/hr), 3-hr avg. 0.037 lb CO/MMBtu, 3-hr avg. 20% ^B
Pulp dryer No. 2, Promill direct-fired triple-pass rotary dryer with a nominal process rate of	36	33	PM	31.9 lb/hr and 0.49 lb/ton of pressed pulp, 3-hr avg. (filterable only)

Emission Unit Description	EU	EP	Pollutant / Parameter	Emission Limit ^A
approximately 65 tons/hr pressed pulp, primarily coal-fired (8.6 tons/hr) with natural gas as a supplemental fuel (40 x 10 ⁶ Btu/hr)			PM ₁₀	59.0 lb/hr and 0.91 lb/ton of pressed pulp, 3-hr avg. (filterable and condensable)
			PM _{2.5}	36.7 lb/hr and 0.56 lb/ton of pressed pulp, 3-hr avg. (filterable and condensable)
			SO ₂	60.3 lb/hr and 0.93 lb/ton of pressed pulp, 3-hr avg.
			SO ₂	3.0 lb/MMBtu heat input
			NO _x	46.8 lb/hr and 0.66 lb/ton of pressed pulp, 3-hr avg.
			CO	458 lb/hr and 7.0 lb/ton of pressed pulp, 3-hr avg.
			VOC	78.2 lb/hr and 1.20 lb/ton of pressed pulp, 3-hr avg.
			GHG	458.3 lb/hr CO (7.0 lb/ton of pressed pulp), 3-hr avg.
			Opacity	20% ^B

^A Emission limits associated with EP 4, EP 9, EP 27a-d, EP 29, and EP 30 are modified from ACP-17815v1.0 with this permit action. Emission limits associated with EP 32 and EP 33 are new for this permit action.

^B 40% opacity is permissible for not more than one six-minute period per hour.

^C Less restrictive 40 CFR 60 Subpart Db NO_x limit of 0.20 lb/MMBtu on a 30-day rolling average also applies.

^D Limit is from 40 CFR 63, Subpart DDDDD.

B. Fuel Restrictions:

1. The package boiler (EU 35) and the lime kiln (EU 28) are restricted to combusting natural gas containing no more than 2 grains of sulfur per 100 standard cubic feet.
2. The pulp dryer No. 1 (EU 4) and pulp dryer No. 2 (EU 36) shall comply with NDAC 33.1-15-06 by combusting low sulfur coal which inherently limits emissions to below 3.0 lb SO₂ per MMBtu. *Note: EU 36 combusts natural gas a supplemental fuel.*

C. New Source Performance Standards (NSPS): The permittee shall comply with all applicable requirements of the following NSPS subparts, in addition to Subpart A, as referenced in Chapter 33.1-15-12 of the North Dakota Air Pollution Control Rules and 40 CFR 60.

1. 40 CFR 60, Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (EU 35).

D. National Emissions Standards for Hazardous Air Pollutants (NESHAP): The permittee shall comply with all applicable requirements of the following NESHAP subparts, in addition to Subpart A, as referenced in Chapter 33.1-15-22 of the North Dakota Air Pollution Control Rules and 40 CFR 63.

1. 40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (EU 01 and 35).

E. **Emissions Testing:** All initial testing will require a minimum of 3 runs, one hour each, unless otherwise specified in a federal subpart.

Emission Unit Description	EP	Contaminant
Dry pulp belt conveyors & bucket elevator	9	PM/PM ₁₀ ^A Opacity
Package boiler	32	PM/PM ₁₀ /PM _{2.5} ^C SO ₂ ^C NO _x CO VOC ^C Opacity ^C
Pulp dryer No. 2	33	PM ^A PM ₁₀ ^B PM _{2.5} ^B SO ₂ NO _x CO VOC Opacity

^A Filterable particulate matter only.

^B Filterable and condensable particulate matter. EPA reference Method 5 and Method 202 may be used to demonstrate compliance where PM is assumed to equal PM₁₀ and PM_{2.5}. Method 201a may be used if breakdown between PM/PM₁₀/PM_{2.5} is desired.

^C Combustion of pipeline quality natural gas eliminates needs for testing to demonstrate compliance.

A signed copy of the test results shall be furnished to the Department within 60 days of the test date. The basis for this condition is NDAC 33.1-15-01-12 which is hereby incorporated into this permit by reference. To facilitate preparing for and conducting such tests, and to facilitate reporting the test results to the Department, the permittee shall follow the procedures and formats in the Department's Emission Testing Guideline¹.

¹ See February 7, 2020, North Dakota Department of Environmental Quality Division of Air Quality Emissions Testing Guidelines. Available at: https://www.deq.nd.gov/publications/AQ/policy/PC/Emission_Testing_Guide.pdf

1. Initial Testing: Within 180 days after completion of this permit action, the permittee shall conduct emissions tests at the emission units listed above using an independent testing firm, to determine the compliance status of the facility with respect to the emission limits from the sources specified in Condition II.A. Emissions testing shall be conducted for the pollutant(s) listed above in accordance with EPA Reference Methods listed in 40 CFR 60, Appendix A. Test methods other than those listed below may be used upon approval by the Department.
2. Notification: The permittee shall notify the Department using the form in the Emission Testing Guideline, or its equivalent, at least 30 calendar days in advance of any tests of emissions of air contaminants required by the Department. If the permittee is unable to conduct the performance test on the scheduled date, the permittee shall notify the Department at least five days prior to the scheduled test date and coordinate a new test date with the Department.
3. Sampling Ports/Access: Sampling ports shall be provided downstream of all emission control devices and in a flue, conduit, duct, stack or chimney arranged to conduct emissions to the ambient air.

The ports shall be located to allow for reliable sampling and shall be adequate for test methods applicable to the facility. Safe sampling platforms and safe access to the platforms shall be provided. Plans and specifications showing the size and location of the ports, platform and utilities shall be submitted to the Department for review and approval.

4. Other Testing:
 - a) The Department may require the permittee to have tests conducted to determine the emission of air contaminants from any source, whenever the Department has reason to believe that an emission of a contaminant not addressed by the permit applicant is occurring, or the emission of a contaminant in excess of that allowed by this permit is occurring. The Department may specify testing methods to be used in accordance with good professional practice. The Department may observe the testing. All tests shall be conducted by reputable, qualified personnel. A signed copy of the test results shall be furnished to the Department within 60 days of the test date.

All tests shall be made available, and the results calculated in accordance with test procedures approved by the Department. All tests shall be made under the direction of persons qualified by training or experience in the field of air pollution control as approved by the Department.

b) The Department may conduct tests of emissions of air contaminants from any source. Upon request of the Department, the permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants.

F. **Best Management Practices:** At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

G. **Stack Heights:** Emissions shall be vented through stacks that meet the following height requirements. Stack heights may be no less than those listed in the table below without prior approval from the Department.

Emission Unit	Emission Point (EP)	Stack Height (Feet)
4	4	180
9 & 11	9	22
28	27a	175
30	29	80
31, 33, 34	30	23
35	32	180
36	33	120

H. **Construction:** Construction of the above described facility shall be in accordance with information provided in the permit application as well as any plans, specifications and supporting data submitted to the Department. The Department shall be notified ten days in advance of any significant deviations from the specifications furnished. The issuance of this Permit to Construct may be suspended or revoked if the Department determines that a significant deviation from the plans and specifications furnished has been or is to be made.

Any violation of a condition issued as part of this permit to construct as well as any construction which proceeds in variance with any information submitted in the application, is regarded as a violation of construction authority and is subject to enforcement action.

I. **Startup Notice:** A notification of the actual date of initial startup shall be submitted to the Department within 15 days after the date of initial startup.

- J. **Like-Kind Engine/Turbine Replacement:** This permit allows the permittee to replace an existing engine or turbine with a like-kind unit. Replacement is subject to the following conditions:
1. The Department must be notified within 10 days after change-out of the unit.
 2. The replacement unit shall operate in the same manner, provide no increase in throughput and have equal or less emissions than the unit it is replacing.
 3. The date of manufacture of the replacement unit must be included in the notification. The facility must comply with any applicable federal standards (e.g. NSPS, MACT) triggered by the replacement.
 4. The replacement unit is subject to the same state emission limits as the existing unit in addition to any NSPS or MACT emission limit that is applicable. Testing shall be conducted to confirm compliance with the emission limits within 180 days after start-up of the unit.
- K. **Organic Compounds Emissions:** The permittee shall comply with all applicable requirements of NDAC 33.1-15-07 – Control of Organic Compounds Emissions.
- L. **Permit Invalidation:** This permit shall become invalid if construction is not commenced within eighteen months after issuance of such permit, if construction is discontinued for a period of eighteen months or more; or if construction is not completed within a reasonable time.
- M. **Title V Permit to Operate:** Within one year after startup of the units covered by this Permit to Construct, the permittee shall submit a permit application for a Title V Permit to Operate revision for the facility.
- N. **Fugitive Emissions:** The release of fugitive emissions shall comply with the applicable requirements in NDAC 33.1-15-17.
- O. **Annual Emission Inventory/Annual Production Reports:** The permittee shall submit an annual emission inventory report and/or an annual production report upon Department request, on forms supplied or approved by the Department.
- P. **Source Operations:** Operations at the installation shall be in accordance with statements, representations, procedures and supporting data contained in the initial application, and any supplemental information or application(s) submitted thereafter. Any operations not listed in this permit are subject to all applicable North Dakota Air Pollution Control Rules.

- Q. **Alterations, Modifications or Changes:** Any alteration, repairing, expansion, or change in the method of operation of the source which results in the emission of an additional type or greater amount of air contaminants or which results in an increase in the ambient concentration of any air contaminant, must be reviewed and approved by the Department prior to the start of such alteration, repairing, expansion or change in the method of operation.
- R. **Air Pollution from Internal Combustion Engines:** The permittee shall comply with all applicable requirements of NDAC 33.1-15-08-01 – Internal Combustion Engine Emissions Restricted.
- S. **Recordkeeping:** The permittee shall maintain any compliance monitoring records required by this permit or applicable requirements. The permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report or application. Support information may include all calibration and maintenance records and all original strip-chart recordings/computer printouts for continuous monitoring instrumentation, and copies of all reports required by the permit.
- T. **Nuisance or Danger:** This permit shall in no way authorize the maintenance of a nuisance or a danger to public health or safety.
- U. **Malfunction Notification:** The permittee shall notify the Department of any malfunction which can be expected to last longer than twenty-four hours and can cause the emission of air contaminants in violation of applicable rules and regulations.
- V. **Operation of Air Pollution Control Equipment:** The permittee shall maintain and operate all air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.
- W. **Transfer of Permit to Construct:** The holder of a permit to construct may not transfer such permit without prior approval from the Department.
- X. **Right of Entry:** Any duly authorized officer, employee or agent of the North Dakota Department of Environmental Quality may enter and inspect any property, premise or place at which the source listed in Item I.B of this permit is located at any time for the purpose of ascertaining the state of compliance with the North Dakota Air Pollution Control Rules. The Department may conduct tests and take samples of air contaminants, fuel, processing material, and other materials which affect or may affect emissions of air contaminants from any source. The Department shall have the right to access and copy any records required by the Department's rules and to inspect monitoring equipment located on the premises.

- Y. **Other Regulations:** The permittee of the source unit(s) described in Item I.B of this permit shall comply with all State and Federal environmental laws and rules. In addition, the permittee shall comply with all local burning, fire, zoning, and other applicable ordinances, codes, rules and regulations.
- Z. **Permit Issuance:** This permit is issued in reliance upon the accuracy and completeness of the information set forth in the application. Notwithstanding the tentative nature of this information, the conditions of this permit herein become, upon the effective date of this permit, enforceable by the Department pursuant to any remedies it now has, or may in the future have, under the North Dakota Air Pollution Control Law, NDCC Chapter 23.1-06.
- AA. **Odor Restrictions:** The permittee shall not discharge into the ambient air any objectionable odorous air contaminant which is in excess of the limits established in NDAC 33.1-15-16.
- BB. **Sampling and Testing:** The Department may require the permittee to conduct tests to determine the emission rate of air contaminants from the source. The Department may observe the testing and may specify testing methods to be used. A signed copy of the test results shall be furnished to the Department within 60 days of the test date. The basis for this condition is NDAC 33.1-15-01-12 which is hereby incorporated into this permit by reference. To facilitate preparing for and conducting such tests, and to facilitate reporting the test results to the Department, the permittee shall follow the procedures and formats in the Department's Emission Testing Guideline.

FOR THE
NORTH DAKOTA DEPARTMENT
OF ENVIRONMENTAL QUALITY

Date: _____ By: _____

James L. Semerad
Director
Division of Air Quality