



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

August 23, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: One Shot, LLC / 089-18323-00485

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

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Commissioner

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August 23, 2004

Mr. Kevin A. Cappo
One Shot, LLC
5300 W. 5th Avenue
Gary, IN 46952

Dear Mr. Cappo:

Re: Exempt Operation Status,
089-18323-00485

The application from One Shot, LLC, received on November 13, 2003, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following operation located at 5300 W. 5th Avenue, Gary, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) paint mixing line consisting of six (6) mixers, with a total combined maximum paint mixing capacity of 450 pound per hour, constructed in 1953 and exhausting within the building.
- (b) One (1) filling line with maximum paint filling capacity of 450 pounds per hour, constructed in 1953 and exhausting within the building.
- (c) One (1) natural gas fired boiler, identified as boiler # 1 rated at 1.084 mmBtu per hour, installed in 1953, and exhausting through one (1) stack.
- (d) One (1) dry material handling operation where powdered fillers and pigments are added to the batches, with maximum capacity of 176.31 pounds per hour, equipped with a cyclone followed by a baghouse for particulate control, and exhausting through one (1) stack.
- (e) Six (6) volatile organic liquid (VOL) fixed roof dome storage tanks, constructed in 1953, identified as Tank # 1, 2, 3, 4, 5 and 6, each with a maximum storage capacity of 1,830, 2,000, 2,000, 2,000, 2,250 and 2,000 gallons, respectively.
- (f) Two (2) volatile organic liquid (VOL) fixed roof dome storage tanks, constructed in 1978, identified as Tank # 7 and 8, each with a maximum storage capacity of 2,000 gallons.
- (g) Three (3) volatile organic liquid (VOL) fixed roof dome storage tanks, constructed in 1982, identified as Tank # 9, 10 and 11, each with a maximum storage capacity of 2,000 gallons.
- (h) Seven (3) volatile organic liquid (VOL) fixed roof dome storage tanks, constructed in 1991, identified as Tank # 12, 13, 14, 15, 16, 17 and 18, each with a maximum storage capacity of 2,000 gallons.

The following conditions shall be applicable:

- (a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:
 - (1) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (b) Pursuant to 326 IAC 6-2-3(d) (Particulate Matter Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the one (1) natural gas fired boiler, identified as boiler # 1, constructed before 1972, and rated at 1.084 mmBtu/hr, shall be limited to 0.8 lbs PM/mmBtu.
- (c) Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), storage tanks identified as # 1 through # 18 are subject to the following record keeping requirements.
 - (1) The Permittee shall keep copies of all records required by this section, except for the record required by paragraph (2) below, for at least two (2) years. The record required by paragraph (2) below will be kept for the life of the source.
 - (2) The Permittee shall keep readily accessible records showing the dimension of each storage vessel, identification number and an analysis showing the capacity of each storage vessel.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

AY/EVP

cc: File - Lake County
Lake County Health Department
Air Compliance Section Inspector – Ramesh Tejuja
Northwest Regional Office
Compliance Data Section – Karen Nowak
Administrative and Development – Janet Mobley
Technical Support and Modeling – Michele Boner
Gary Department of Environmental Affairs

**Indiana Department of Environmental Management
Office of Air Quality
and Gary Department of Environmental Affairs**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	One Shot, LLC
Source Location:	5300 W. 5 th Avenue, Gary, IN 46406
County:	Lake
SIC Code:	2851
Operation Permit No.:	019-17328-00112
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed an application from One Shot, LLC relating to the operation of paint blending, filling and packaging.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) One (1) paint mixing line consisting of six (6) mixers, with a total combined maximum paint mixing capacity of 450 pound per hour, constructed in 1953 and exhausting within the building.

Note: The maximum capacity of this paint mixing line is limited to 450 tons per hour because of the maximum production capacity of the filling line, which is a limiting line with maximum capacity of 450 pounds per hour as well (bottleneck).

- (b) One (1) filling line with maximum paint filling capacity of 450 pounds per hour, constructed in 1953 and exhausting within the building.
- (c) One (1) natural gas fired boiler, identified as boiler # 1 rated at 1.084 mmBtu per hour, installed in 1953, and exhausting through one (1) stack.
- (d) One (1) dry material handling operation where powdered fillers and pigments are added to the batches, with maximum capacity of 176.31 pounds per hour, equipped with a cyclone followed by a baghouse for particulate control, and exhausting through one (1) stack.
- (e) Six (6) volatile organic liquid (VOL) fixed roof dome storage tanks, constructed in 1953, identified as Tank # 1, 2, 3, 4, 5 and 6, each with a maximum storage capacity of 1,830, 2,000, 2,000, 2,000, 2,250 and 2,000 gallons, respectively.
- (f) Two (2) volatile organic liquid (VOL) fixed roof dome storage tanks, constructed in 1978, identified as Tank # 7 and 8, each with a maximum storage capacity of 2,000 gallons.
- (g) Three (3) volatile organic liquid (VOL) fixed roof dome storage tanks, constructed in 1982, identified as Tank # 9, 10 and 11, each with a maximum storage capacity of 2,000 gallons.
- (h) Seven (3) volatile organic liquid (VOL) fixed roof dome storage tanks, constructed in 1991, identified as Tank # 12, 13, 14, 15, 16, 17 and 18, each with a maximum storage capacity of 2,000 gallons.

Existing Approvals

This source does not have any prior approvals. This is the first air approval being granted to the source.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment.
- (b) IDEM is also aware that the source submitted the Permit application late.
- (c) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 13, 2003, with additional information received on April 11, 2004, May 15, 2004, June 12, 2004 and July 6, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 6).

Potential to Emit (of the Source or Revision) Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	1.94
PM-10	1.97
SO ₂	0.00
VOC	9.89
CO	0.40
NO _x	0.47

HAPs	Potential to Emit (tons/yr)
Ethylbenzene	0.19
Toluene	0.01
Xylenes	0.77
Methanol	0.05
Cumene	0.07
Total	1.09

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Attainment
SO ₂	Primary nonattainment
NO ₂	Attainment
1-hour Ozone	Severe nonattainment
8-hour Ozone	Moderate nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
 - (1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
 - (2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

- (b) Lake County has been classified as attainment or unclassifiable in Indiana for PM-10, NO₂, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (c) Lake County has been classified as nonattainment in Indiana for SO₂. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (e) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.01
PM-10	0.04
SO ₂	0.00
VOC	9.89
CO	0.40
NO _x	0.47
Single HAP	0.77
Combination HAPs	1.09

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on emission calculations derived from information provided in the application submitted by One Shot, LLC received on November 13, 2003, with additional information received on April 11, 2004, May 15, 2004, June 12, 2004 and July 6, 2004.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 089-18323-00485, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) Storage Tanks at this source are not subject to the requirements of the New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60), 40 CFR 60.110b, Subpart Kb, because each tank has a storage capacity less than seventy-five (75) cubic meters.
- (b) One (1) natural gas fired boiler constructed in 1953, rated at 1.084 MMBtu per hour is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because the boiler's capacity is less than the rule applicability threshold of 10 MMBtu per hour.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-3 (Emission Offset)

This source is not subject to the requirements of 326 IAC 2-3 (Emission Offset), because the source's potential to emit of VOC is less than 25 tons per year since the start of the operation in 1950s.

326 IAC 2-6 (Emission Reporting)

This source is located in Lake County and the potential to emit of VOC and NO_x is less than twenty-five (25) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability – Individual Facilities

326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations)

The source is not subject to the requirements of 326 IAC 6-1-2, because the potential particulate matter (PM) emissions from the source are less than 100 tons per year and the actual PM emissions from the source are less than 10 tons per year.

326 IAC 6-1-10.1 (Lake County PM-10 Emission Requirements)

The source is not listed in 326 IAC 6-1-10(d). Therefore, pursuant to 326 IAC 6-1-10(a), the requirements of 326 IAC 6-1-10 do not apply.

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) natural gas fired boiler, constructed before 1983 and rated at 1.084 mmBtu/hr, is subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, particulate emissions from indirect heating facilities constructed prior to September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

- C = 50 u/m³
- Pt = emission rate limit (lbs/mmBtu)
- Q = total source heat input capacity (mmBtu/hr)
- N = number of stacks
- a = plume rise factor (0.67)
- h = stack height in feet. If a number of stacks of different heights exist, average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times pa_i \times Q_i}{\sum_{i=1}^N pa_i \times Q_i}$$

where: Pa = the actual controlled emissions rate in lb/mmBtu using the emission factor form AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

$$Pt = (50 \times 0.67 \times 34) / (76.5 \times 1.084^{0.75} \times 1^{0.25}) = 14.01 \text{ lbs PM/mmBtu}$$

However, per 326 IAC 6-2-3(d), Pt for indirect heating facilities constructed before 1972 shall not exceed 0.8 lbs PM/mmBtu, therefore the boiler # 1 is limited to 0.8 lbs PM/mmBtu.

compliance calculation:

Potential PM emissions for one (1) boiler = 1.9 lb PM/mmCF * (1/1000) (mmCF/mmBtu) = 0.0019 lbs PM/mmBtu.

Potential PM emission for the boiler (0.0019 lbs PM/mmBtu) is less than the allowable 0.8 lbs PM/mmBtu, therefore the boiler # 1 will comply with the requirements of 326 IAC 6-2-3.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to this facility because potential VOC emissions are less than twenty-five (25) tons per year.

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirements of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels with capacities less than 39,000 gallons are only subject to the reporting and record keeping requirements of the rule. Stationary vessels with capacities equal to or greater than 39,000 gallons storing a VOL with a maximum true vapor pressure equal to or greater than 0.5 pounds per square inch absolute (psia), but less than 0.75 psia, are only subject to 326 IAC 8-9-6(a),(b),(g), and (h).

While the storage tanks at this source contain volatile organic compounds, they have storage capacities less than 39,000 gallons. Therefore, the storage tanks are only subject to the reporting and record keeping requirements of this rule.

There are no other 326 IAC 8 rules that apply.

Conclusion

The operation of this paint mixing, filling and shipping facility shall be subject to the conditions of the attached proposed Exemption No. 089-18323-00485.

Appendix A: Emission Calculations

Company Name: One Shot, LLC
Address City IN Zip: 5300 W. 5th Avenue, Gary, Indiana
Permit No: 089-18323-00485
Reviewer: AY/EVP
Date: June 28, 2004

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Powder Handling	Liquid Mixing and Filling	TOTAL
PM	0.01	1.93	0.00	1.94
PM10	0.04	1.93	0.00	1.97
SO2	0.00	0.00	0.00	0.00
NOx	0.47	0.00	0.00	0.47
VOC	0.03	0.00	9.86	9.89
CO	0.40	0.00	0.00	0.40
total HAPs	negl.	0.00	1.09	1.09
worst case single HAP	negl.	0.00	0.77 (Xylenes)	0.77 (Xylenes)

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Powder Handling	Liquid Blending and Mixing	TOTAL
PM	0.01	0.00	0.00	0.01
PM10	0.04	0.00	0.00	0.04
SO2	0.00	0.00	0.00	0.00
NOx	0.47	0.00	0.00	0.47
VOC	0.03	0.00	9.86	9.89
CO	0.40	0.00	0.00	0.40
total HAPs	negl.	0.00	1.09	1.09
worst case single HAP	negl.	0.00	0.77 (Xylenes)	0.77 (Hexane)

Total emissions based on rated capacity at 8,760 hours/year.

**Appendix A: Emission Calculations
VOC Emissions**

Company Name: One Shot, LLC
Address City IN Zip: 5300 W. 5th Avenue, Gary, Indiana
Permit No: 089-18323-00485
Reviewer: AY/EVP
Date: June 28, 2004

Potential Emissions:

VOC Emissions

Emission Point	VOC content of the Paint (%)	Emission Factor (lb VOC/lb paint)	Maximum Production (lb paint/hr) *	Annual Throughput (lb/yr)	Potential VOC Emissions (lb/hr)	Potential VOC Emissions (ton/yr)
Mixing and Filling	25.00%	2.00E-02	450.00	3,942,000	2.25	9.86
Total Emissions:						9.86

Methodology:

Emission (tons/yr) = Production rate (lb/hr) * VOC content of the Paint (%) * Emission Factor (lb VOC / lb paint) * (1 ton/ 2000 lbs) * 4.38 (tons/yr / lb/hr)

Production rates are provided by the source.

Emission Factor of 0.02 used from the National Paint and Coating Association "Emission Estimation Guidance Manual for the Paint and Coatings Industry" 2nd edition 1995. Two (2) % of VOC is emitted start to finish.

* Maximum production rate of mixing operation is 1000 lbs per hour, however, the filling operation can only handle 450 lbs per hour as a maximum capacity. Therefore, filling operation is a limiting operation with a bottleneck limiting the maximum capacity of mixing operation to 450 lbs per hour as well.

Appendix A: Emission Calculations

Company Name: One Shot, LLC
Address City IN Zip: 5300 W. 5th Avenue, Gary, Indiana
Permit No: 089-18323-00485
Reviewer: AY/EVP
Date: June 28, 2004

Operation	HAP content of the Paint (%) *	Emission Factor (lb VOC/lb paint)	Production (lb paint/hr)	HAP Content (%)								
				Ethylbenzene	Ethylene Glycol	Toluene	Triethylene	Xylenes	Methanol	Napthalene	Cumene	
Mixing and Filling	1.25%	2.00%	1000.00	17.61%	0.07%	0.91%	0.07%	70.37%	4.59%	0.09%	6.27%	
				HAP Emissions (tons/yr)								
				Ethylbenzene	Ethylene Glycol	Toluene	Triethylene	Xylenes	Methanol	Napthalene	Cumene	Emissions (tons/yr)
				0.19	0.00	0.01	0.00	0.77	0.05	0.00	0.07	1.09
										Total		1.09

Methodology:

Emission (tons/yr) = Production rate (lb/hr) * Emission Factor (0.02) * HAP Content (%) * (1 ton/ 2000 lbs) * 4.38 (tons/yr / lb/hr)

Total emissions based on rated capacity at 8,760 hours/year.

* HAP content was calculated based on the information that 95% of the solvent used consists of mineral spirits, which does not contain any HAPs. Therefore, only remaining 5% represents HAPs at the source. HAP content was calculated as: 25% (VOC content of the Paint) * 5% = 1.25%

**Appendix A: Emissions Calculations
Particulate Matter (PM) Emissions**

Company Name: One Shot, LLC
Address City IN Zip: 5300 W. 5th Avenue, Gary, Indiana
Permit No: 089-18323-00485
Reviewer: AY/EVP
Date: May 5, 2004

Particulate Emissions from Powder Handling

Maximum Throughput (lb/hr)	Percent Emitted (%) *	Potential Emissions (lb/hr)	Potential Emissions (ton/yr)	Control Efficiency (%)	Controlled Emissions (ton/yr)
176.31	0.25	0.44	1.93	99.90	0.0019

Methodology

Uncontrolled PM/PM10 = Maximum Throughput (lb/hr) * Percent Emitted (%) * 4.38 (ton/yr / lb/hr)

Controlled PM/PM10 = Maximum Throughput (lb/hr) * Percent Emitted (%) * 4.38 (ton/yr / lb/hr) * (1 - control efficiency %)

Particulate emissions are controlled by a cyclone with 95% control efficiency followed by a baghouse with control efficiency of 98%. Based on this, the overall control efficiency is calculated as follows: $100 - [(1-0.95) \times (1-0.98) \times 100] = 99.90\%$

* Percent emitted is provided by the source based on mass balance.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: One Shot, LLC
Address City IN Zip: 5300 W. 5th Avenue, Gary, Indiana
Permit No: 089-18323-00485
Reviewer: AY/EVP
Date: May 5, 2004

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.1	9.5

One natural gas fired boiler rated at maximum heat input rating of 1.084 MMBtu/yr

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.01	0.04	0.00	0.47	0.03	0.40

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: One Shot, LLC

Address City IN Zip: 5300 W. 5th Avenue, Gary, Indiana

Permit No: 089-18323-00485

Reviewer: AY/EVP

Date: May 5, 2004

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.971E-06	5.698E-06	3.561E-04	8.546E-03	1.614E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.374E-06	5.223E-06	6.647E-06	1.804E-06	9.971E-06

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.