INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: September 25, 2006

RE: Technifab Products, Inc. / 021-23258-00057

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

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 IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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 of 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
FN-REGIS.dot 03/23/06

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Indianapolis, Indiana 46204-2251
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September 25, 2006

Mr. Rob Drake
Technifab Products, Inc.
P.O. Box 315
Brazil, Indiana 47834

Re: Registered Construction and Operation Status,
021-23258-00057

Dear Mr. Drake:

The application from Technifab Products, Inc., received on June 22, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following emission units at a dewar manufacturing operation, located at 10399 N. Industrial Park Drive, Brazil, Indiana, are classified as registered:

(a) One (1) natural gas-fired process heater, constructed in 2006, with a maximum capacity of 0.882 MMBtu per hour.

(b) One (1) paint booth, constructed in 2006, using one (1) electrostatic air atomized spray gun for painting metal dewars, and controlled by a dry filter.

(c) Twelve (12) Tungsten Inert Gas (TIG) welding stations, with a maximum electrode consumption of 1.5 pounds per hour each, with construction years as follows:

(1) One (1) TIG station constructed in 1992,

(2) One (1) TIG station constructed in 1993,

(3) Two (2) TIG stations constructed in 1995,

(4) One (1) TIG station constructed in 1997,

(5) One (1) TIG station constructed in 1999,

(6) Five (5) TIG stations constructed in 2000, and

(7) One (1) TIG station constructed in 2004.

The following conditions shall be applicable:

1. 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:

(a) Opacity shall not exceed an average of forty percent (40%) 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 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.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251

no later than March 1 of each year, with the annual notice being submitted in the format attached.

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.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Ms. Stacie Enoch, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7895 to speak directly to Ms. Enoch. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/SE

cc: File – Clay County
Clay County Health Department
Air Compliance Inspector – Jim Thorpe
Permit Tracking
Compliance Data Section

Registration
Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

Company Name:	Technifab Products, Inc.
Address:	10399 N. Industrial Park Drive
City:	Brazil, Indiana 47834
Authorized individual:	Noel Short
Phone #:	(812) 442-0520
Registration #:	021-23258-00057

I hereby certify that Buckeye Technifab Products, Inc. is still in operation and is in compliance with the requirements of Registration 021-23258-00057.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Technifab Products, Inc.
Source Location:	10399 N. Industrial Park Drive, Brazil, Indiana, 47834
County:	Clay
SIC Code:	3479
Registration No.:	021-23258-00057
Permit Reviewer:	ERG/SE

The Office of Air Quality (OAQ) has reviewed an application from Technifab Products, Inc. relating to the construction and operation of a dewar manufacturing operation.

Note: A dewar is a metal container with an evacuated space between the walls that can be used for storing liquefied gas (may also be called a dewar flask or vacuum bottle).

Unpermitted Emission Units and Pollution Control Equipment

(a) One (1) natural gas-fired process heater, constructed in 2006, with a maximum capacity of 0.882 MMBtu per hour.

(b) One (1) paint booth, constructed in 2006, using one (1) electrostatic air atomized spray gun for painting metal dewars, and controlled by a dry filter.

(c) Twelve (12) Tungsten Inert Gas (TIG) welding stations, with a maximum electrode consumption of 1.5 pounds per hour each, with construction years as follows:

(1) One (1) TIG station constructed in 1992,

(2) One (1) TIG station constructed in 1993,

(3) Two (2) TIG stations constructed in 1995,

(4) One (1) TIG station constructed in 1997,

(5) One (1) TIG station constructed in 1999,

(6) Five (5) TIG stations constructed in 2000, and

(7) One (1) TIG station constructed in 2004.

Existing Approvals

This is the first air approval issued to this source.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper approval. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".

(b) IDEM is reviewing this matter and will take appropriate action. This proposed registration is intended to satisfy the requirements of the construction and operating 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.

A complete application for the purposes of this review was received on June 22, 2006 with aditional information received on August 8, 2006.

Emission Calculations

See Appendix A, pages 1 through 5 of this document for detailed emission calculations.

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	6.79
PM-10	6.81
SO_2	2.27E-03
VOC	2.10
CO	0.32
NO_x	0.38

HAPs	Potential to Emit (tons/yr)
Xylene	0.52
Toluene	0.10
Methyl Isobutyl Ketone	0.10
Ethyl Benzene	0.10
Other HAPs	0.02
Total	0.83

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 25 tons per year. The potential to emit PM and PM10 is greater than 5 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A registration will be issued.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program).

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 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.

County Attainment Status

The source is located in Clay County.

Pollutant	Status
PM-10	Attainment
PM 2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: On August 7, 2006, a temporary emergency rule took effect redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

(a) Clay County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability - Entire Source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) emissions are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Clay County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.

(c) Clay County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

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	6.79
PM-10	6.81
SO_2	2.27E-03
VOC	2.10
CO	0.32
NO_x	0.38
Single HAP	0.52
Combination HAPs	0.83

This existing source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This source is 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) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this registration for this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) included in this registration for this source. The requirements of the National Emission Standard for Surface Coating of Metal Cans (40 CFR 63, Subpart KKKK) or the National Emission Standard for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) are not included in this registration for this source, because it is not a major source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source was initially constructed in 1992 in Clay County, and consisted of oneTIG welder with a potential to emit all criteria pollutants less than 250 tons per year. The source added one TIG welder in 1993, two TIG welders in 1995, one TIG welder 1997, one TIG welder in 1999, five TIG welders in 2000, and one TIG welder in 2004. The potential to emit all criteria pollutants remained less than 250 tons per year. In 2006, the source will add a paint booth and natural gas-fired heater. The potential to emit after the additional units will remain less than 250 tons per year for all criteria pollutants. Therefore, this source has not triggered 326 IAC 2-2 and is a minor source for future modifications.

326 IAC 2-6 (Emission Reporting)

This source is located in Clay County, is not required to operate under the Part 70 Permit Program, and does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, 326 IAC 2-6 is not applicable.

326 IAC 5-1 (Visible Emissions 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 registration:

(a) Opacity shall not exceed an average of forty percent (40%) 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.

State Rule Applicability – Surface Coating

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The surface coating operation at this source has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore 326 IAC 6-3 does not apply to the surface coating operation.

326 IAC 8-1-6 (Volatile Organic Compounds)

The surface coating operation does not have potential emissions of twenty-five (25) tons or more per year of VOC. Therefore the surface coating operation is not subject to the requirements of 326 IAC 8-1-6.

326 IAC 8-2 (Surface Coating Emission Limitations)

The surface coating operation does not have potential emissions of twenty-five (25) tons or greater per year of VOC or actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Therefore, the surface coating operation is not subject to the requirements of 326 IAC 8-2.

State Rule Applicability – Natural Gas Combustion

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired heater is not subject to 326 IAC 6-2 because it is not a source of indirect heating.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired heater is exempt from the requirements of 326 IAC 6-3, because it has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 7-1.1 (Sulfur dioxide emission limitations: applicability)

The natural gas-fired heater is not subject to the requirements of 326 IAC 7-1.1, because the potential emissions of SO_2 are less than twenty-five (25) tons per year and ten (10) pounds per hour.

State Rule Applicability – Welding

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(9), the tungsten inert gas (TIG) welding stations are exempt from the requirements of 326 IAC 6-3, because the potential to consume welding wire is less than six hundred twenty-five (625) pounds per day.

Conclusion

The operation of this dewar manufacturing operation shall be subject to the conditions of the Registration 021-23258-00057.

Appendix A: Emission Calculations
VOC and Particulate Emissions
From Surface Coating Operations

Company Name: Technifab Products, Inc.
Address: 10339 N. Industrial Park Drive, Brazil, Indiana 47834
Registration: 021-23258-00057
Reviewer: ERG/SE
Date: August 11, 2006

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Material (gal/unit)	Maximum Throughput (units/hr)	Pounds VOC per Gallon of Coating Less Water	Pounds VOC per Gallon of Coating (lbs/gal)	PTE VOC (lbs/hr)	PTE VOC (lbs/day)	PTE VOC (tons/yr)	PTE Particulate (tons/yr)	*Transfer Efficiency
AUE 100	10.4	45.0%	0.0%	45.0%	0.0%	0.0%	0.042	1.00	4.67	4.67	0.20	4.70	0.86	0.37	65%
AUE 101	8.85	75.0%	0.0%	75.0%	0.0%	0.0%	0.042	1.00	6.64	6.64	0.28	6.69	1.22	0.14	65%
										Total	**0.47**	**11.4**	**2.08**	**0.51**	

The potential emission calculations above are based on a worst case scenario of both surface coating materials being used at the maximum capacity.
Actual emissions will be from a mixture of AUE 100 and AUE 101 (mix ratio 4:1).
*The transfer efficiency is the worst case transfer efficiency reported in AP-40 for Electrostatic Air Atomized surface coating.

METHODOLOGY
Pounds of VOC per Gallon Coating = Density (lbs/gal) * Weight % Organics
PTE VOC (lbs/hr) = Pounds of VOC per Gallon Coating (lbs/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hr)
PTE VOC (lbs/day) = Pounds of VOC per Gallon Coating (lbs/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hr) * 24 hr/day
PTE VOC (tons/yr) = Pounds of VOC per Gallon Coating (lbs/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE Particulate (tons/yr) = Maximum Throughput (units/hour) * Gal of Material (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emissions from Surface Coating
From Surface Coating Operations

Company Name: Technifab Products, Inc.
Address: 10339 N. Industrial Park Drive, Brazil, Indiana 47834
Registration: 021-23258-00057
Reviewer: ERG/SE
Date: August 11, 2006

Material	Density (lbs/gal)	Gal of Material (gal/unit)	Maximum Throughput (units/hr)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Hexamethylene Diisocyanate	PTE Xylene (tons/yr)	PTE Toluene (tons/yr)	PTE Methyl Isobutyl Ketone (tons/yr)	PTE Ethyl Benzene (tons/yr)	PTE Hexamethylene Diisocyanate (tons/yr)	PTE Total HAPs (tons/yr)
AUE 100	10.4	0.042	1.00	10.0%	5.00%	5.00%	5.00%	0.00%	0.19	0.10	0.10	0.10	0.00	0.48
AUE 101	8.85	0.042	1.00	20.0%	0.00%	0.00%	0.00%	1.00%	0.33	0.00	0.00	0.00	0.02	0.34
								Total	**0.52**	**0.10**	**0.10**	**0.10**	**0.02**	**0.82**

The potential emission calculations above are based on a worst case scenario of both surface coating materials being used at the maximum capacity.
Actual emissions will be from a mixture of AUE 100 and AUE 101 (mix ratio 4:1).

Methodology
PTE HAPs (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Natural Gas Combustion

Company Name: Technifab Products, Inc.
Address: 10339 N. Industrial Park Drive, Brazil, Indiana 47834
Registration: 021-23258-00057
Reviewer: ERG/SE
Date: August 11, 2006

Total Heat Input Capacity MMBtu/hour	Potential Throughput MMscf/year
0.882	7.6

	Pollutant						
	PM*	PM10*	SO_2	NOx **	VOC	CO	HAPs
Emission Factor (lbs/MMscf)	1.9	7.6	0.6	100	5.5	84.0	1.89
PTE (tons/year)	0.01	0.03	0.00	0.38	0.02	0.32	0.01

* PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM and PM10 combined.
**Emission factor for NOx (Uncontrolled) = 100 lb/MMscf.
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4, SCC #1-02-006-02, 1-03-006-02, and 1-03-006-03 (7/98).
All emission factors are based on normal firing.

Methodology
Potential Throughput (MMscf/year) = Heat Input Capacity (MMBtu/hour) x 8,760 hours/year x 1 MMscf/1,020 MMBtu
PTE (tons/year) = Potential Throughput (MMscf/year) x Emission Factor (lbs/MMscf) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Particulate Emissions from Welding

Company Name: Technifab Products, Inc.
Address: 10339 N. Industrial Park Drive, Brazil, Indiana 47834
Registration: 021-23258-00057
Reviewer: ERG/SE
Date: August 11, 2006

Welding	Number of Stations	Electrode Consumption per Hour-Station (lbs/hour-station)	Emission Factor (lb pollutant/lb electrode consumed)	Potential to Emit (tons/year)
			PM/PM10	PM/PM10
Tungsten Inert Gas (TIG)	12	1.50	0.0796	6.28

Emission factor is from AP-42, Background Document for Chapter 12.19, Figure 2-15, Solid GMAW Electrodes for Aluminum.
Emission factor for GMAW welding is used as a worst case scenario for TIG welding.

Methodology
Potential to Emit (tons/year) = Number of Stations x Electrode Consumption (lbs/hour-station) x Emission Factor (lbs pollutant/lbs electrode) x 8760 (hours/year) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Summary

Company Name: Technifab Products, Inc.
Address: 10339 N. Industrial Park Drive, Brazil, Indiana 47834
Registration: 021-23258-00057
Reviewer: ERG/SE
Date: August 11, 2006

	Uncontrolled Potential to Emit (tons/yr)						
	PM	PM10	SO_2	NOx	VOC	CO	HAPs
Surface Coating	0.51	0.51			2.08		0.82
Natural Gas Combustion	0.01	0.03	2.27E-03	0.38	0.02	0.32	0.01
Welding	6.28	6.28					0.00
Total	**6.79**	**6.81**	**2.27E-03**	**0.38**	**2.10**	**0.32**	**0.83**