



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53 IGCN 1003
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: September 28, 2007
RE: Triumph Controls, LLC / 145-25129-00069
FROM: Nisha Sizemore
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



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
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Mr. Dave Duerr
Triumph Controls, LLC
1960 N. Michigan Rd.
Shelbyville, IN 46176

September 28, 2007

Dear Mr. Duerr:

Re: Exempt Construction and Operation Status,
145-25129-00069

The application and additional information from Triumph Controls, LLC received on August 13, 2007 and August 23, 2007, have been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary aircraft control assembly operation, located at 1960 N. Michigan Rd., Shelbyville, IN 46176, is classified as exempt from air pollution requirements:

- (a) One (1) paint booth for touch up of aircraft parts, using low-volume high-pressure spray or hand roller application, constructed in 2006, with a maximum capacity of 0.125 units per hour, with particulate matter controlled by dry filters.
- (b) Eight (8) natural gas fired heaters, each with a maximum heat input rate of 0.324 MMBtu/hr.

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:
 - (1) 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.
 - (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 6-3-2(d) (Particulate Emission Limitations), the paint booth shall meet the following:
 - (1) Particulate from the paint booth shall be controlled by dry filters and the source shall operate the control device in accordance with manufacturer's specifications.
 - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (i) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (ii) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (3) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.
- (c) Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).
- (d) To render the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable, the owner or operator of this source shall comply with the following:

The VOC usage for the paint booth shall be less than 15.0 pounds per day with compliance determined at the end of each day.

To document compliance with this limit, the owner or operator of this source shall maintain records for the total VOC usage for the paint booth each day. These records shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit for the paint booth:

- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on a daily basis.
 - (i) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (ii) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each day; and
- (4) The total VOC usage for each day.

Records of all required monitoring data, reports and support information required by this exemption shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the owner or operator of this source, the owner or operator of this source shall furnish the records to the Commissioner within a reasonable time.

Unless otherwise specified in this exemption, all record keeping requirements not already legally required shall be implemented within ninety (90) days of approval date of this exemption.

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.

If you have any questions on this matter, please contact Renee Traivaranon, Office of Air Quality, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-233-8397 or at 1-800-451-6027 (ext 3-8397).

Sincerely,

Original Signed By:
Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

RT
cc: File - Shelby County
Shelby County Health Department
Air Compliance Section -- David Harrison
Permit Administration & Development Section
Billing, Licensing, and Training Section - Dan Stamatkin

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Triumph Controls, LLC
Source Location:	1960 N. Michigan Rd., Shelbyville, IN 46176
County:	Shelby
SIC Code:	3728
Operation Permit No.:	145-25129-00069
Permit Reviewer:	Renee Traivaranon

The Office of Air Quality (OAQ) has reviewed an application from Triumph Controls, LLC, relating to the operation of a stationary aircraft control assembly plant.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following emission units and pollution control devices:

- (a) One (1) paint booth for touch up of aircraft parts, using low-volume high-pressure spray or hand roller application, constructed in 2006, with a maximum capacity of 0.125 units per hour, with particulate matter controlled by dry filters.
- (b) Eight (8) natural gas fired heaters, each with a maximum heat input rate of 0.324 MMBtu/hr.

Existing Approvals

This is the first air approval issued to this source.

Enforcement Issue

There are no enforcement actions pending.

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 and additional information for the purposes of this review was received on August 13, 2007 and August 23, 2007.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations (Appendix A, page 1 through 4)

Potential to Emit of the Source 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	1.98
PM-10	2.06
SO ₂	0.01
VOC	4.43
CO	1.0
NO _x	1.1
Single HAP	0.16 (Toluene)
Total HAPs	0.37

- (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/or 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.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

County Attainment Status

The source is located in Shelby County.

Pollutant	Status
PM-2.5	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
8 hr Ozone	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. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone standards. Shelby County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

- (b) Shelby County has been classified as unclassifiable or 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 a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (c) Shelby County has been classified as attainment or unclassifiable for all other 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.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Source Status

Existing Source PSD and Emission Offset 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	1.98
PM-10	2.06
SO ₂	0.01
VOC	4.43
CO	1.0
NO _x	1.1
Single HAP	0.16 (Toluene)
Combination HAPs	0.37

This existing source is not a major stationary source under 326 IAC 2-2 (PSD) 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.

This existing source is not a major stationary source under 326 IAC 2-3 (Emission Offset) because no nonattainment 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. Therefore, pursuant to 326 IAC 2-3, the Emission Offset 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 for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included for this source.

The requirements of 40 CFR 63, Subpart M (National Emission Standards for Hazardous Air Pollutants (NESHAP)-Miscellaneous Metal Parts and Products) are not included for this source because the source is not a major source for Hazardous Air Pollutants (HAPs); the potential to emit of single HAP is less than 10 tons per year and the potential to emit of combined HAPs is less than 25 tons per year.

The requirements of the National Emission Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters, 326 IAC 20, (40 CFR Part 63, Subpart DDDDD), are not included for this source because the source is not a major source for Hazardous Air Pollutants (HAPs); the potential to emit of single HAP is less than 10 tons per year and the potential to emit of combined HAPs is less than 25 tons per year.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed after the applicability date of August 7, 1977, however, it is not one of the 28 listed source categories defined in 326 IAC 2-2-1(gg)(1), and the uncontrolled potential to emit of all attainment regulated pollutants is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-3 (Emission Offset)

Shelby County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. The potential to emit of VOC and nitrogen oxides (NOx) for this source are each less than one hundred (100) tons per year, therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply.

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

The potential to emit of each facility at the source is less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Shelby County, has the potential to emit of each criteria pollutant of less than hundred (100) tons per year and the potential to emit lead of less than five (5) tons per year. Therefore, the requirements of 326 IAC 2-6 do 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:

- (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.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 7-1.1-1 (Sulfur dioxide emission limitations: applicability)

The source is not subject to the requirements of 326 IAC 7-1.1, because the potential to emit of each emission unit is less than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

The requirements of 326 IAC 8-1-6 are not applicable to each facility at the source because the potential to emit of each facility is less than twenty-five (25) tons of VOC per year.

326 IAC 10-1 (Nitrogen Oxides Control)

The source is not subject to 326 IAC 10 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd Counties.

State Rule Applicability - Individual Facilities

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

(a) Pursuant to 326 IAC 6-3-1(b)(14), each of the natural gas-fired heaters are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, each natural gas-fired heater has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

(b) Pursuant to 326 IAC 6-3-2(d), the following requirements apply to the paint booth:

- (1) Particulate emissions from the paint booth shall be controlled by dry filters and the source shall operate the control device in accordance with manufacturer's specifications.
- (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (i) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (ii) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (3) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

326 IAC 8-2-9 (Miscellaneous metal coating operations)

Pursuant to 326 IAC 8-2-1, the provisions of 326 IAC 8-2-9 apply to miscellaneous metal coating operations constructed after July 1, 1990 located in any country. The potential to emit of the paint booth is greater than fifteen (15) pounds per day, but source has opted to limit the VOC input to less than fifteen (15) pounds per day. Therefore, the owner or operator of this source shall comply with the following:

- (a) The VOC usage for the paint booth shall be less than 15.0 pounds per day with compliance determined at the end of each day.

Compliance with this limit renders the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.

- (b) To document compliance with this limit, the owner or operator of this source shall maintain records for the total VOC usage for the paint booth each day. These records shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit for the paint booth:

- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on a daily basis.
 - (i) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (ii) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each day; and
- (4) The total VOC usage for each day.

- (c) Records of all required monitoring data, reports and support information required by this exemption shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the owner or operator of this source, the owner or operator of this source shall furnish the records to the Commissioner within a reasonable time.

- (d) Unless otherwise specified in this exemption, all record keeping requirements not already legally required shall be implemented within ninety (90) days of approval date of this exemption.

Conclusion

The operation of the emission units at the Triumph Controls, LLC shall be subject to the conditions of Exemption No. 145-25129-00069.

**Appendix A: Emissions Calculations
HAPs
From Surface Coating Operations**

**Company Name: Triumph Controls, LLC
Address City IN Zip: 1960 N. Michigan Rd., Shelbyville, IN 46176
Permit Number: 145-25129-00069
Reviewer: Renee Traivaranon
Date: August 23, 2007**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Total HAPs (ton/yr)
Sherwin Williams #238	9.9	1.00	0.13	3.00%	3.00%	0.40%	0.16	0.16	0.02	0.35

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Natural Gas Heaters**

**Company Name: Triumph Controls, LLC
Address City IN Zip: 1960 N. Michigan Rd., Shelbyville, IN 46176
Permit Number: 145-25129-00069
Reviewer: Renee Traivaranon
Date: August 23, 2007**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.6

22.7

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	0.022	0.09	0.01	1.1	0.1	1.0

*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

Natural Gas Heaters

HAPs Emissions

Company Name: Triumph Controls, LLC

Address City IN Zip: 1960 N. Michigan Rd., Shelbyville, IN 46176

Permit Number: 145-25129-00069

Reviewer: Renee Traivaranon

Date: August 23, 2007

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	2.384E-05	1.362E-05	8.515E-04	2.044E-02	3.860E-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	5.676E-06	1.249E-05	1.589E-05	4.314E-06	2.384E-05

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.