



DATE: October 9, 2008

TO: Interested Parties / Applicant

RE: Leppert Mortuary / E097-26834-00647

FROM: Richard Wise
Administrator
Office of Environmental Services

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 501, 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw



October 9, 2008

Mr. John T. Leppert
Leppert Mortuary
740 East 86th Street
Indianapolis, IN 46240

Certified Mail Number: 7008 0150 0003 5219 4285

Dear Mr. Leppert:

Re: Exempt Construction and Operation Status,
097-26834-00647

The application from Leppert Mortuary, received on August 1, 2008 with additional information on August 15, 2008, 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 stationary crematory for human remains, located at 740 East 86th Street, Indianapolis, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) Crawford C-1000 human crematory, with afterburner, identified as EU-1, constructed in 2008, with a maximum operating capacity of 150 pounds per hour (lbs/hr), using natural gas as a supplemental fuel at maximum heat input capacity of 1.9 million Btu per hour (MMBtu/hr).

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 thirty percent (30%) 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (2) Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), 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.
- (3) Pursuant to 326 IAC 4-2-2, the human crematory identified as EU-1 shall:
 - (a) Consist of primary and secondary chambers or the equivalent;
 - (b) Be equipped with a primary burner unless burning only wood products;
 - (c) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules);
 - (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan approved by the Administrator;



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- (e) Emission unit EU-1 shall not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air because the maximum solid waste capacity is less than two hundred (200) pounds per hour;
 - (f) If any of the above requirements (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation; and
 - (g) The incinerator is exempt from requirement (5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.
- (4) Pursuant to Chapter 511 "Air Pollution Control Ordinance", Section 511-503, the source shall comply with the following conditions:
- (a) An operator must be in attendance at all times while the crematory is in operation.
 - (b) The operator must keep a log (in a form approved by the Administrator) of the number of bodies cremated, chamber temperature at the beginning of each cremation for the emission unit, and the dates and times of the cremation for the emission unit.
 - (c) Required records must be kept on-site for three (3) years and available for inspection by the City of Indianapolis Office of Environmental Services (OES).
 - (d) An afterburner must be used at all times while the unit is in operation. The afterburner must be operating at a minimum temperature of 1600° F while the crematory is in operation.
 - (e) Opacity shall not exceed ten percent (10%) for any six-minute period as measured according to 40 CFR 60, Appendix A, Method 9.
 - (f) Aside from the human remains, no additional material other than cardboard or pine may be added to the crematory for incineration.
 - (g) No cremation may occur between sunset and sunrise unless the unit has a Certified Opacity Monitor (COM) operating at all times during night burning.

This condition (4) is a "local only" condition. It is not enforceable under state or federal law by IDEM or U.S.EPA. Pursuant to Chapter 511 "Air Pollution Control Ordinance", Sections 511-503 and 511-504 of the Revised Code of the Consolidated City of Indianapolis and Marion County, Indiana, this condition is enforceable by the City of Indianapolis through its Department of Public Works, Office of Environmental Services.

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 Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Leppert Mortuary
Indianapolis, Indiana
Permit Reviewer: Adam Estes

Page 3 of 3
E097-26834-00647

Sincerely,

Original Signed by

Richard Wise
Administrator
Office of Environmental Services

aje

cc: OES Files - 2 copies
Compliance - Matt Mosier
USEPA - R5
Marion County Health Dept.
IDEM, Mindy Hahn

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

Technical Support Document (TSD) for an Exemption

Source Description and Location

Source Name: Leppert Mortuary
Source Location: 740 East 86th Street, Indianapolis, IN 46240
County: Marion
SIC Code: 7261
Exemption No.: E097-26834-00647
Permit Reviewer: Adam Estes

On August 1, 2008, the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the Office of Environmental Services (OES) received an application from Leppert Mortuary related to the construction and operation of a new human crematory.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic Nonattainment effective April 5, 2005 for PM _{2.5} .	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) 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 and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM_{2.5}

Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

Marion County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, NO₂, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) and OES reviewed an application, submitted by Leppert Mortuary on August 1, 2008, relating to the construction and operation of a Human crematory.

The source consists of the following emission unit:

- (a) One (1) Crawford C-1000 human crematory, with afterburner, identified as EU-1, constructed in 2008, with a maximum operating capacity of 150 pounds per hour (lbs/hr), using natural gas as a supplemental fuel at maximum heat input capacity of 1.9 million Btu per hour (MMBtu/hr).

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. However, the air emissions from the source have been evaluated and no air permit is needed. Therefore, no enforcement action is necessary.

Emission Calculations

See Appendix A, pages 1 through 3, of this TSD for detailed emission calculations.

Permit Level Determination – Exemption

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM _{2.5}	PM ₁₀ *	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
EU-1	2.32	2.36	2.36	0.8	1.83	1.05	4.0	Negl.	Negl.
Total PTE of Entire Source	2.32	2.36	2.36	0.8	1.83	1.05	4.0	Negl.	Negl.
Exemption Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	-	-
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM ₁₀), not particulate matter (PM), is considered as a "regulated air pollutant".									

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Standards of Performance for Incinerators, 40 CFR 60, Subpart E (326 IAC 12), are not included in the permit, since the cremation unit has a charge rate of less than fifty (50) tons per day.
- (b) There are no (other) New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) included in this exemption. The crematory does not combust hazardous waste as defined in 40 CFR 261. Therefore, it is not subject to the requirements of 40 CFR 63 Subpart EEE.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326

IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 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 this permit:
- (1) Opacity shall not exceed an average of thirty percent (30%) 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.
- (e) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This source does not have the potential to emit particulate matter 100 tons per year or more and since potential PM emission are less than 10 tons, then actual PM emission will be less than 10 tons (see Appendix A, pages 1 through 3). Therefore, 326 IAC 6.5-1 does not apply.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), 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.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

- (i) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
None of the emission units at this source is subject to the requirements of 326 IAC 8-1-6, since the unlimited potential to emit of VOC from the emission unit is less than twenty-five (25) tons per year.

Cremation Unit – EU-1

- (a) 326 IAC 4-2-2 (Incinerators: requirements)
Pursuant to 326 IAC 4-2-2, the human crematory, identified at EU-1, shall:
 - (1) Consist of primary and secondary chambers or the equivalent;
 - (2) Be equipped with a primary burner unless burning only wood products;
 - (3) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules);
 - (4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan approved by the Administrator;
 - (5) Emission unit EU-1 shall not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air because the maximum solid waste capacity is less than two hundred (200) pounds per hour;
 - (6) If any of the above requirements (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation; and
 - (7) The incinerator is exempt from requirement (5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

Local Rule Applicability

Pursuant to Chapter 511 "Air Pollution Control Ordinance", Section 511-503, the source shall comply with the following conditions:

- (a) An operator must be in attendance at all times while the crematory is in operation.
- (b) The operator must keep a log (in a form approved by the Administrator) of the number of bodies cremated, chamber temperature at the beginning of each cremation for the emission unit, and the dates and times of the cremation for the emission unit.
- (c) Required records must be kept on-site for three (3) years and available for inspection by the City of Indianapolis Office of Environmental Services (OES).
- (d) An afterburner must be used at all times while the unit is in operation. The afterburner must be operating at a minimum temperature of 1600° F while the crematory is in operation.
- (e) Opacity shall not exceed ten percent (10%) for any six-minute period as measured according to 40 CFR 60, Appendix A, Method 9.
- (f) Aside from the human remains, no additional material other than cardboard or pine may be added to the crematory for incineration.

- (g) No cremation may occur between sunset and sunrise unless the unit has a Certified Opacity Monitor (COM) operating at all times during night burning.

These conditions (a through g) are "local only" conditions. They are not enforceable under state or federal law by IDEM or U.S.EPA. Pursuant to Chapter 511 "Air Pollution Control Ordinance", Sections 511-503 and 511-504 of the Revised Code of the Consolidated City of Indianapolis and Marion County, Indiana, these conditions are enforceable by the City of Indianapolis through its Department of Public Works, Office of Environmental Services.

Conclusion and Recommendation

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 August 1, 2008 with additional information received on August 15, 2008.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No. 097-26834-00647. The staff recommends to the Commissioner that this Exemption be approved.

OES Contact

- (a) Questions regarding this proposed permit can be directed to Adam Estes at the Indianapolis Office of Environmental Services, Compliance Section, 2700 South Belmont, Indianapolis, Indiana 46221 or by telephone at (317) 327-2285.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov.

**Appendix A: Emission Calculations
Incinerator**

Company Name: Leppert Mortuary
Address City IN Zip: 740 East 86th Street, Indianapolis, IN 46240
Exemption: E097-26834-00647
Reviewer: Adam Estes
Date: August 25, 2008

For cremation

Throughput lbs/hr 150

Throughput
tons/yr
657

Emission Factor in lb/ton	POLLUTANT				
	PM	SO ₂	CO	VOC	NO _x
7.0	2.5	10.0	3.0	3.0	
Potential Emissions in ton/yr	2.3	0.8	3.3	1.0	1.0

Methodology

There is no emission factor for PM_{2.5} and PM₁₀ listed in AP-42, therefore it is assumed that PM₁₀ and PM_{2.5}=PM
 Emission Factors are from AP-42 Figure 2.1-12: Uncontrolled Emission Factors For Refuse Combustors Other Than Municipal Waste, multiple chambers
 Throughput lbs/hr * 24 hr/day * 365 day/yr * 1 ton/2,000 lbs = Throughput tons/yr
 Emission Factor * 1 ton/2,000 lbs * Throughput tons/yr = Potential Emissions in ton/yr

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR < 100**

Company Name: Leppert Mortuary
Address City IN Zip: 740 East 86th Street 46240
Exemption: E097-26834-00647
Reviewer: Adam Estes
Date: August 25, 2008

Heat Input Capacity MMBTU / hr 1.9
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Potential Throughput
MMCF / yr
16.644

Emission Factor in lbs / MMCF	POLLUTANT					
	PM*	PM ₁₀ *	SO ₂	NO _x **	VOC	CO
Potential Emission in tons / yr	1.9	7.6	0.6	100	5.5	84
	0.02	0.06	0.00	0.83	0.05	0.70

*PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM₁₀ combined. PM_{2.5} emissions = PM₁₀ emissions.

**Emission factors for NO_x: Uncontrolled = 100, Low NO_x burners = 50, Low NO_x burners/flue gas recirculation = 32.

Methodology

All emission factors are based on normal firing

1 MMBTU = 1,000,000 BTU

1 MMCF = 1,000,000 Cubic feet of gas

Heat Input Capacity * (24 hr / day) * (365 day / yr) * (1 MMCF / 1,000 MMBTU) = Potential Throughput

Emission Factors are from AP 42 Chapter 1.4, tables 1.4-1 & 1.4-2 Small boilers

Potential Throughput * Emission Factor * (1 ton / 2,000 lbs) = Potential Emission

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR < 100**

Company Name: Leppert Mortuary
Address City IN Zip: 740 East 86th Street 46240
Exemption: E097-26834-00647
Reviewer: Adam Estes
Date: August 25, 2008

Emission Factor in lbs / MMCF	HAPs - Organic				
	Butane 2.1	Ethane 3.0	Hexane 1.8	Pentane 1.5	Propane 1.6
Potential Emission in tons / yr	1.7127E-02	2.5291E-02	1.4680E-02	1.2891E-02	1.3049E-02

Emission Factor in lbs / MMCF	HAPs - Metallic				
	Cadmium 1.08E-03	Chromium 1.37E-03	Molybdenum 1.08E-03	Nickel 2.06E-03	Zinc 2.84E-02
Potential Emission in tons / yr	8.9711E-06	1.1418E-05	8.9711E-06	1.7127E-05	2.3659E-04

Methodology

Methodology is the same as page 2

The five highest organic and metallic HAPs emission factors appear above.

Additional HAPs emission factors are provided on AP 42 Chapter 1, 1.4-3 and 1.4-4.