

proposed

**ENHANCED NEW SOURCE REVIEW PERMIT
OFFICE OF AIR MANAGEMENT**

**Koetter Woodworking, Inc.
Building 247 America Place
Jeffersonville, Indiana 47130**

(herein known as the Permittee) is hereby authorized to construct the facilities listed in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Enhanced New Source Review Permit No.: CP-019-9959-00071	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This enhanced new source review permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)]

Responsible Official: Bill Broderick
Source Address: Building 247 America Place, Jeffersonville, Indiana 47130
Mailing Address: 533 Louis Smith Road, Borden, Indiana 47106
SIC Code: 2431
County Location: Clark
County Status: Attainment for PM10, CO, SO₂, and Pb
Nonattainment for VOC, and NO_x

A.2 Emission Units and Pollution Control Equipment Summary

The construction and operation of the following equipment to the existing Louver Line:

Two (2) flow coating operations, located in series, each exhausting to separate Stacks S1 and S2. Each flow coating operation is capable of painting a maximum of 8,580 square feet of wood louvers per hour.

A.3 Conditions Superseded

These flow coating operations shall replace the two (2) spray booths permitted under CP-019-4312 and shall supersede Operation Conditions 4, 5, 6, 7(b) for surface coating, and 8 of CP-019-4312 issued on June 15, 1995.

Section B

Construction Conditions

B.1 General Construction Conditions

- (a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may result in an increase in allowable emissions, the change must be approved by IDEM, OAM.
- (b) This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- (c) Notwithstanding Construction Condition B.4, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).
- (d) When the facility is constructed and placed into operation, the operation conditions required by Section C shall be met.

B.2 Effective Date of the Permit

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance, unless a petition for a stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Permit Revocation

Pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 First Time Operation Permit

This document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, IN 46206-6015

verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM, OAM.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).
- (e) The Permittee submitted their Part 70 permit application (T-019-7687-00071) on December 13, 1996 for the existing source. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

- (e) for any cause which establishes in the judgment of IDEM, OAM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

C.4 Availability of Permit

Pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by IDEM, OAM, or other public official having jurisdiction.

Emission Limitations and Standards:

C.5 Particulate Matter (PM) Emission Limitations

Pursuant to 326 IAC 6-3 (PM Emission Limitations for Process Operations), the allowable PM emissions from the wood louver flow coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

C.6 Volatile Organic Compound (VOC) Emission Limitations

- (a) Pursuant to 326 IAC 8-2-12 (Surface Coating Emission Limitations for Wood Furniture and Cabinet Coating), the surface coatings applied to wood furniture and/or wood furnishings shall utilize one or more of the following application methods:

Airless Spray Application	Air-Assisted Airless Spray Application
Electrostatic Spray Application	Electrostatic Bell or Disc Application
Heated Airless Spray Application	Roller Coating
Brush or Wipe Application	Dip-and-Drain Application
High Volume Low Pressure HVLP	Aerosol Spray Cans

High volume low pressure spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (b) The total volatile organic compound input usage, including solvents, from the wood louvers flow coating operations shall be limited to 8.25 tons per month. Therefore, 326 IAC 2-3 (Emission Offset Rule) does not apply.

C.7 Hazardous Air Pollutant (HAP) Emission Limitations

The wood louver flow coating operations is subject to 326 IAC 2-1-3.4 (New Source Toxic Control Rule) and shall comply with the following conditions by June 10, 1999:

- (a) Use compliant finishing materials in which all stains have a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied.
- (b) Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solid,

as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; and

- (c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

C.8 Work Practice Standards

The Permittee of the wood louver flow coating operations shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date as part of the requirements of 326 IAC 2-1-3.4. The work practice implementation plan must define environmentally desirable work practices for the coating operation and at a minimum address each of the following work practice standards:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Line cleaning.
- (h) Gun cleaning.
- (i) Washoff operations.
- (j) Formulation assessment plan for finishing operations.

Compliance Determination Requirements

C.9 Testing and Compliance Monitoring Requirements

- (a) The PM overspray from the wood louver flow coating operations shall be in compliance with the PM emission limitations contained in Condition C.5 provided that a noticeable change in overspray emission is not observed. If no overspray emission is usually observed, evidence of any overspray emission will be considered a noticeable change.
- (b) Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), the Permittee shall demonstrate compliance with the VOC usage limitations contained in Condition C.6(b) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (c) Pursuant to 326 IAC 2-1-3.4, the Permittee shall demonstrate compliance using compliant coatings according to the following criteria:
 - (1) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 pound VHAP/pound solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;

- (2) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 pound VHAP/pound solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and
- (3) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 pound VHAP/pound solids and a thinner containing no more than 3.0 percent VHAP by weight.

IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limitations specified in Condition C.7 shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures) utilizing methods approved by IDEM, OAM.

Record Keeping and Reporting Requirements

C.10 Emission Reporting Requirement

Pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee shall annually submit an emission statement of the source. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015.

The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due.

C.11 Record Keeping Requirements

- (a) To document compliance with Conditions C.6 (VOC Emission Limitations) and C.7 (HAP Emission Limitations), the Permittee shall maintain records in accordance with (1) through (5) below:
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each finishing material, thinner, contact adhesive and strippable coating used.
 - (4) The monthly VOC emission records in tons of VOC per month from the louver flow coating operation.

- (5) The VHAP content in weight percent of each thinner used.

Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VOC and VHAP usage limits established in Conditions C.6 and C.7. All records shall be maintained at the source location for a minimum period of 36 months and shall be made available within one (1) hour upon verbal request of an IDEM, OAM representative.

- (b) To document compliance with Condition C.8, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

C.12 Reporting Requirements

- (a) A VOC Quarterly Report of monthly VOC emissions to demonstrate compliance with the limitations required by Operation Conditions C.6(b) shall be submitted within thirty (30) days following each quarter.
- (b) An Initial Compliance Report to document compliance with Condition C.7 and the Certification Form, shall be submitted within sixty (60) days following the compliance date of June 1, 1999. The Initial Compliance Report shall consist of data for the month of June 1999.
- (c) A semi-annual Continuous Compliance Report to document compliance with Conditions C.7 and C.9(c) and the Certification Form, shall be submitted within thirty (30) days after the end of the six (6) month reporting period:
- (1) The first semi-annual Continuous Compliance Report shall include the period from June 1, 1999 through December 31, 1999.
- (2) Starting January 1, 2000, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.
- (d) The reports required in (a), (b), and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

**Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section**

VOC Quarterly Report

Company Name: Koetter Woodworking, Inc.
Location: Building 247 America Place, Jeffersonville, Indiana 47130
Permit No.: 019-9959-00071
Source/Facility: Louver Line - Two (2) Flow Coating Operations
Pollutant: VOC - Limit to avoid Emission Offset (326 IAC 2-3)
Limit: 8.25 tons VOC per month

YEAR: _____

Month	VOC Input Usage (tons/month)

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**Indiana Department of Environmental Management
 Office of Air Management
 Compliance Data Section**

**Certification Form
 VOC and VHAP Semi-Annual Report**

Company Name: Koetter Woodworking, Inc.
 Location: Building 247 America Place, Jeffersonville, Indiana 47130
 Permit No.: 019-9959-00071
 Source/Facility: Louver Line - Two (2) Flow Coating Operations
 Pollutant: VOC and VHAPs - State MACT (326 IAC 2-1-3.4)
 Limit: (1) Finishing operations -1.0 lb VHAP/lb Solids
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
 (3) All other thinner mixtures - 10% VHAP content by weight
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

- No deviation occurred in this six month period.
 Deviation/s occurred in this six month period.
 Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for Enhanced New Source Review and Operation

Source Background and Description

Source Name: Koetter Woodworking, Inc.
 Source Location: Building 247 America Place, Jeffersonville, Indiana
 County: Clark
 Construction Permit No.: 019-9959-00071
 SIC Code: 2431
 Permit Reviewer: Michele M. Williams

The Office of Air Management (OAM) has reviewed an application from Koetter Woodworking relating to the construction and operation of the following equipment to the existing Louver Line:

Two (2) flow coating operations, located in series, each exhausting to separate Stacks S1 and S2. Each flow coating operation is capable of painting a maximum of 8,580 square feet of wood louvers per hour.

The louvers are conveyed through the first flow coating operation, then flipped and passed through the second flow coating operation. The flow coating operations shall replace one (1) fire damaged spray booth and one (1) existing spray booth on the existing Louver Line currently permitted under CP-019-4312. This proposed permit shall supersede operation conditions relating to the coating operations in CP-019-4312.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S1	Flow Coating Operation	19	1.5	4000	70

Recommendation

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

Information, unless otherwise stated, 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 July 16, 1998.

Emissions Calculations

Detailed emission calculations are provided in Appendix A.

Total Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)
Particulate Matter (PM)	0
Particulate Matter (PM10)	0
Sulfur Dioxide (SO ₂)	0
Volatile Organic Compounds (VOC)	435
Carbon Monoxide (CO)	0
Nitrogen Oxides (NO _x)	0
Single Hazardous Air Pollutant (HAP)	137
Combination of HAPs	158

- (a) Allowable emissions (as defined in the Indiana Rule) of VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.
- (b) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and/or the allowable emissions of any combination of the HAPs are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.

County Attainment Status

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as nonattainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Clark County has been classified as attainment or unclassifiable for PM10, SO₂ and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	5.5
PM10	5.5
SO ₂	0
VOC	99
CO	0
NO _x	0

- (a) This existing source is not a major stationary source because it is not one of the 28 listed source categories and PM or VOC is not emitted at a rate of 100 tons per year or more.
- (b) These emissions were based on construction permit CP-019-4312-00071 issued on June 15, 1995.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	0	0	0	99	0	0
PSD or Offset Threshold Level	250	250	250	100	250	100

- (a) This is a minor stationary source because the total source PTE has been limited to less than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.
- (b) According to the MSDS information provided in the application, the HAP pollutants (xylene, methyl ethyl ketone, and toluene) are VOCs. Therefore, the HAP emissions will subsequently be limited to 99 tons per year.
- (c) This proposed surface coating operation will replace the fire damaged surface coating equipment in construction permit CP-019-4312-00071. The VOC limitation required by the original permit will carry over to the proposed surface coating operation. The total source VOC PTE shall remain 99 tons per year as a result of this replacement.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 application (T-019-7687-00071) on December 13, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

40 CFR 60 (NSPS) and 40 CFR 63 (NESHAP)

The flow coating operation is not subject to any New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP).

State Rule Applicability

326 IAC 2-1-3.4 (New Source Toxic Control)

The New Source Toxics Control rule requires any new or reconstructed major source of hazardous air pollutants (HAPs) for which there is no applicable NESHAP shall be required to make the maximum achievable control technology (MACT) determination on a case-by-case basis. The wood louver flow coating operation is not subject to 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) because the wood louvers are not a furniture or furniture component as defined by the rule. Although a wood louver does not meet the definition of a furniture or furniture component as defined by 40 CFR 63, Subpart JJ, the wood louver operation is similar to a wood furniture operation, and therefore the requirements of 40 CFR 63, Subpart JJ can be applied as state MACT. The state MACT shall meet the emission limitations for new and reconstructed sources required by 40 CFR 63, Subpart JJ through the use of compliant coatings.

326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6, because it is located in Clark County and has the potential to emit more than 10 tons/yr of VOC. Pursuant to this rule, the owner/operator of this source must annually submit an emission statement of the source. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4. A copy of the applicable rule will be enclosed with the permit.

326 IAC 8-2-12 (VOC Emission Limitations for Wood Furniture and Cabinet Coating)

This source is subject to 326 IAC 8-2-12 because a wood louver is a wood furnishing. Although the woodlouvers (blinds) are not wood furniture as defined in the federal NESHAP (40 CFR 63, Subpart JJ), the state rule applies to both wood furniture *and* wood furnishings. A furnishing is defined in *The American Heritage College Dictionary* as "equipment that is necessary, useful, or desirable". The wood louvers meet the definition of a furnishing and therefore is subject to the requirements of 326 IAC 8-2-12. Pursuant to this rule, the owner/operator shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) of the application methods listed in the rule. The coating operations at this source include two (2) flow coating operations. The flow coaters are categorized under the roller coat system, and, therefore, is in compliance with this rule.

326 IAC 8-11 (Wood Furniture VOC Coating Limitations)

This source is not subject to 326 IAC 8-11 because even though the source is located in Clark County, the wood louvers are not classified by any of the Standard Industrial Classification (SIC) codes specified in the rule.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of 187 selected hazardous pollutants. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries in the state. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

This proposed modification has the potential to emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act. The hazardous air pollutants have been controlled/limited pursuant to 326 IAC 2-1-3.4 (New Source Toxic Control Rule) as discussed in the *State Rule Applicability* section above.

Conclusion

The construction of the flow coating operations will be subject to the conditions of the attached proposed **Enhanced New Source Review Permit No. CP-019-9959-00071**.

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % Toluene	Weight % Xylene	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Combined HAP Emissions (tons/yr)
Primer										
320 White Spray Primer	10.25	0.29750	8.580	0.00%	14.90%	0.00%	0.00	17.07	0.00	17.07
Stain Sealers										
311 W/W Lac T/C-55	7.75	0.29750	8.580	13.50%	18.20%	0.00%	11.70	15.77	0.00	27.47
344 Cherry Stain	7.00	0.29750	8.580	19.80%	16.90%	0.00%	15.50	13.23	0.00	28.72
344 Oak Stain	7.00	0.29750	8.580	19.20%	17.40%	0.00%	15.03	13.62	0.00	28.64
344 Golden Oak Stain	7.00	0.29750	8.580	18.70%	16.90%	0.00%	14.63	13.23	0.00	27.86
435 Pecan Stain	7.08	0.29750	8.580	18.50%	16.50%	0.00%	14.64	13.06	0.00	27.70
320 Bleached White B/C	7.75	0.29750	8.580	17.20%	2.40%	0.00%	14.90	2.08	0.00	16.98
Topcoat										
325 Candlelight Enamel	8.25	0.73500	8.580	11.20%	1.80%	0.00%	25.52	4.10	0.00	29.62
325 Alabaster Enamel	8.33	0.73500	8.580	11.10%	1.80%	0.00%	25.54	4.14	0.00	29.68
325 Cotton White Enamel	8.25	0.73500	8.580	11.20%	1.80%	0.00%	25.52	4.10	0.00	29.62
325 Wh Spray Enamel	8.25	0.73500	8.580	11.20%	1.80%	0.00%	25.52	4.10	0.00	29.62
325 102 Arctic Ice Enamel	8.25	0.73500	8.580	11.20%	1.80%	0.00%	25.52	4.10	0.00	29.62
Additive										
Gloss Additive	7.91	0.08750	8.580	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
White Tint	13.82	0.08750	8.580	5.00%	5.00%	0.00%	2.27	2.27	0.00	4.54
Reformulated Coatings										
Primer	10.25	0.29750	8.580	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Topcoat	8.25	0.73500	8.580	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Solvents										
Butyl Acetate Solvent	7.33	0.33250	8.580	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
MEK Solvent #2	6.75	0.33250	8.580	100.00%	0.00%	0.00%	84.34	0.00	0.00	84.34
360 Lacquer Thinner	6.58	0.33250	8.580	33.50%	18.20%	1.50%	27.54	14.96	1.23	43.74
Worst Case Single HAP Potential Emissions:							137	32.0	1.23	
Worst Case Combined HAP Potential Emissions:										158

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