Statement of Basis

Permit to Construct No. P-2012.0047
Project ID 61092

Teton Sales Company, LLC
Caldwell, Idaho

Facility ID 027-00067

Final

September 20, 2012
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Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01.et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CMS	continuous monitoring systems
CO	carbon monoxide
CO_2e	CO_2 equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
gal/hr	gallons per hour, based on a calendar day average
gal/yr	gallons per year, based on a rolling 12-month average period
gr/dscf	grains (1 lb = 7,000 grains) per dry standard cubic feet
HAP	hazardous air pollutants
hr	hour
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MSDS	Material Safety Data Sheets
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O_2	oxygen
OSHA	Occupational Safety and Health Administration
PAH	polyaromatic hydrocarbons
PM	particulate matter
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	*Rules for the Control of Air Pollution in Idaho*
SIP	State Implementation Plan
SO_2	sulfur dioxide
SO_x	sulfur oxides
T/yr	tons per year, based on a calendar year average
TAP	toxic air pollutants
TSDF	treatment, storage, and disposal facility
VOC	volatile organic compounds

[redacted]

Emission Inventories

Emission inventories were provided in the application and were reviewed by DEQ, including criteria, hazardous air pollutant (HAP), and greenhouse gas (GHG) emissions. Refer to Appendix A for a summary of regulated air pollutant emissions.

Project Emission Increase

Because many coating throughput limits remained unchanged or were reduced in this permitting action, an emissions increase in criteria pollutant or greenhouse gas emissions is not anticipated to result from this project, with the exception of PM emissions.

Because new limits have been established for white basecoat, white lacquer, glycol ether, and acetone thinner, potential emissions increases in toxic air pollutant (TAP) emissions may result for those TAP substances contained in such coatings. It is noted that facility-wide TAP emissions were used to demonstrate compliance with applicable TAP screening emission levels (EL); compliance with TAP EL was therefore similarly demonstrated for any resulting increase in emissions.

Refer to the Ambient Air Quality Impact Analyses section for a discussion of compliance with modeling screening thresholds.

Ambient Air Quality Impact Analyses

As presented in the application, estimated emission rates from this project were below applicable screening emission levels (EL) and published DEQ modeling screening thresholds established in IDAPA 58.01.01.585-586 and in the State of Idaho Air Quality Modeling Guideline.[1] Refer to the Emission Inventories section for additional information concerning the emission inventories.

The applicant has therefore demonstrated compliance to DEQ's satisfaction that emissions from this facility will not cause or significantly contribute to a violation of any ambient air quality standard. The applicant has also demonstrated compliance to DEQ's satisfaction that the emissions increase due to this permitting action will not exceed any acceptable ambient concentration (AAC) or acceptable ambient concentration for carcinogens (AACC) for TAP.

The controlled TAP emissions rates that were compared to the EL assumed the use of operational limitations, including operating hours and material usage limits (refer to the Emission Inventories and Permit Conditions Review sections for additional information). Coating material emission rates were also based directly on the maximum weight percent of each TAP and VOC listed in the material safety data sheets (MSDS), and on the volumetric mixing ratios specified in the application. As a result, any change in MSDS or coating formulation that could result in the emission of a new TAP or could result in an increase in any TAP emission may require a permit modification unless the source meets PTC exemption criteria provided in IDAPA 58.01.01.220-223.

Emission inventories for this facility, including a comparison of emission rates to applicable EL, are included in Appendix A.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

This facility is located in Canyon County, which is designated as attainment or unclassifiable for $PM_{2.5}$, PM_{10}, SO_2, NO_2, CO, and ozone. Refer to 40 CFR 81.313 for additional information.

Permit to Construct (IDAPA 58.01.01.201)

The permittee has requested a revision of PTC No. P-060032. Therefore, this permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

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[1] Criteria pollutant thresholds in Table 1, State of Idaho Air Quality Modeling Guideline, Doc ID AQ-011, rev. 1, December 31, 2002.

Tier II Operating Permit (IDAPA 58.01.01.401)

The application was submitted for a permit to construct (refer to the Permit to Construct (IDAPA 58.01.01.201) section), and a Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

The facility is classified as a synthetic minor facility, because without limits on the potential to emit, VOC and HAP emissions have the potential to exceed major source thresholds. The facility is not classified as a major facility for Tier I permitting purposes, in accordance with IDAPA 58.01.01.008.10. The facility is not a designated facility as defined in IDAPA 58.01.01.006.30.

The facility-wide VOC annual emission limit (Permit Condition 2.13), as well as annual usage limits for coating materials (Permit Conditions 3.5 and 4.3), are considered synthetic minor limits to limit both HAP and VOC emissions to below major source thresholds (10 T/yr for individual HAP, 25 T/yr for combined HAP, and 100 T/yr for VOC). Because HAP and VOC emissions are based on the amount of coating materials used and the coating material formulations identified in the application, HAP emissions are also effectively limited to below major source thresholds by these limits (Permit Conditions 2.13, 3.5, and 4.3).

PSD Classification (40 CFR 52.21)

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. PSD requirements are therefore not applicable to this permitting action in accordance with 40 CFR 52.21(a)(2).

The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not emit or have the potential to emit criteria air pollutants in amounts greater than or equal to the major threshold criteria of 250 T/yr. Greenhouse gases (GHG) are not subject to regulation at this time because the facility does not emit or have the potential to emit GHG in amounts greater than or equal to the major threshold criteria of 100,000 T/yr CO_2e.

The facility-wide VOC annual emission limit (Permit Condition 2.13), as well as annual usage limits for coating materials (Permit Conditions 3.5 and 4.3), are considered PSD avoidance limits to limit VOC emissions to below major thresholds (250 T/yr for VOC).

NSPS Applicability (40 CFR 60)

The facility is not subject to any New Source Performance Standards (NSPS) in 40 CFR Part 60.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 61.

MACT Applicability (40 CFR 63)

The facility is subject to 40 CFR 63 Subpart QQQQ - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products.

Although the facility has proposed to operate as a minor source of hazardous air pollutant (HAP) emissions, it was determined to be an existing affected source on the compliance date specified in 40 CFR 63.4683 (3 years after May 28, 2003), in accordance with 40 CFR 63.4682. The facility is therefore subject to the requirements of this subpart. Applicable requirements were addressed and incorporated in PTC No. P-060032, issued on May 8, 2007. Requirements were incorporated into this permit as per the initial PTC, with the exception that requirements identified as "non-applicable" or "not required" have been removed.

Refer to the application and to the statement of basis for PTC No. P-060032 for a regulatory analysis of this subpart.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted in this permitting action.

Permit Conditions 2.1 – 2.4

Permit Condition 2.1 incorporates requirements for the control of fugitive dust in accordance with IDAPA 58.01.01.650-651.

Monitoring, recordkeeping, and reporting requirements (MRRR) include the following (Permit Conditions 2.2 – 2.4):

- Inspect sources of fugitive emissions quarterly.
- Take corrective action when appropriate.
- Monitor and record the frequency and methods used to control fugitive dust emissions.
- Record fugitive dust complaints received, fugitive dust inspections, and corrective actions.

Permit Conditions 2.5 – 2.6

Permit Condition 2.5 incorporates "state-only" requirements for the control of odors in accordance with IDAPA 58.01.01.775-776.

MRRR include the following (Permit Condition 2.6):

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action when appropriate.
- Record corrective actions.

Permit Conditions 2.7 – 2.8

Permit Condition 2.7 incorporates visible emissions limits in accordance with IDAPA 58.01.01.625.

MRRR include the following (Permit Condition 2.8):

- Inspect potential sources of visible emissions monthly.
- Take appropriate corrective actions to eliminate the visible emissions and perform Method 9 opacity testing when appropriate.
- Maintain records of inspection, opacity tests, and corrective actions.
- Report exceedances.

Revised Permit Condition 2.9

This permit condition incorporates open burning requirements in accordance with IDAPA 58.01.01.600-623.

This permit condition was revised only to correct the rule citations in order to incorporate all applicable requirements.

Permit Condition 2.10

This permit condition establishes a generally applicable MRRR for submittal of reports, certifications, and notifications.

Removed Permit Condition 2.11 (P-060032)

This permit condition has been addressed by the duty to comply general provision (Permit Condition 5.1), and has been removed from the Facility-Wide Conditions section of the permit.

Permit Condition 2.11

This permit condition incorporates fuel-burning equipment PM standards in accordance with IDAPA 58.01.01.675-681.

Permit Condition 2.12

This permit condition limits fuel type to natural gas only for the drying ovens and space heaters.

Development of the emissions inventory and preconstruction compliance with TAP screening emission levels assumed the combustion of only natural gas fuels in the drying ovens and space heaters.

Revised Permit Condition 2.13

This permit condition limits facility-wide VOC emissions.

The facility-wide VOC annual emission limit (Permit Condition 2.13), as well as annual usage limits for coating materials (Permit Conditions 3.5 and 4.3), are considered synthetic minor limits to limit both HAP and VOC emissions to below major source thresholds. Development of the emissions inventories and preconstruction compliance with TAP screening emission levels assumes compliance with these limits.

Refer to the Application Scope section (Table 2) for a summary of permit limit revisions, including the VOC emission limit.

Compliance with this limit is ensured by complying with annual throughput monitoring and recordkeeping (Permit Condition 3.9).

Refer to the Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70) and PSD Classification (40 CFR 52.21) sections for additional information.

Added Permit Condition 2.14

This permit condition incorporates federally applicable requirements by reference in accordance with IDAPA 58.01.01.107.

Because this is a generally applicable requirement, no MRRR has been required in the permit (beyond that specified elsewhere) for this facility-wide condition. This permit condition also replaces the stated requirement to comply with 40 CFR 63 Subpart QQQQ (preceding Permit Condition 2.15 in P-060032).

Revised Permit Condition 2.15 – 2.29

These permit conditions incorporate NESHAP requirements from 40 CFR 63 Subpart QQQQ – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products.

MRRR include the following (Permit Conditions 2.22 – 2.29):

- Comply with applicable general provision, notification, reporting, recordkeeping, and compliance demonstration requirements in 40 CFR 63 Subpart QQQQ and as incorporated by reference (Permit Condition 2.14).

These permit conditions were revised only to remove references to requirements previously identified as "non-applicable" or "not required".

Revised Permit Condition 3.1

This permit condition limits daily PM_{10} emissions from the spray booth.

Refer to the Application Scope section (Table 2) for a summary of permit limit revisions, including the PM_{10} emission limits.

Compliance with this limit is ensured by complying with daily throughput monitoring and recordkeeping (Permit Condition 3.8).

Revised Permit Condition 3.2

This permit condition limits annual PM_{10} emissions from the spray booth.

Compliance with this limit is ensured by complying with filtration system operations and maintenance requirements (Permit Conditions 3.6 and 3.7).

Removed Permit Conditions 3.3.3 and 3.3.4 (P-060032)

Daily emissions of calcium carbonate and quartz were considered inherently limited by daily coating material throughput limits (Permit Condition 3.4). As a result, these emission limits were no longer considered necessary, and were removed.

Permit Condition 3.3

This permit condition references the facility-wide VOC emission limit (see Permit Condition 2.13).

Permit Condition 3.4

This permit condition limits daily throughput of coatings used in the spray booth.

Compliance with this limit is ensured by complying with daily monitoring and recordkeeping requirements (Permit Condition 3.8).

Permit Condition 3.5

This permit condition limits annual throughput of coatings used in the spray booth.

The facility-wide VOC annual emission limit (Permit Condition 2.13), as well as annual usage limits for coating materials (Permit Conditions 3.5 and 4.3), are considered synthetic minor limits to limit both HAP and VOC emissions to below major source thresholds. Development of the emissions inventories and preconstruction compliance with TAP screening emission levels assumes compliance with these limits.

Compliance with this limit is ensured by complying with monitoring and recordkeeping requirements (Permit Condition 3.9).

Refer to the Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70) and PSD Classification (40 CFR 52.21) sections for additional information.

Revised Permit Conditions 3.6 and 3.7

These permit conditions establish operation and maintenance requirements for the spray booth filtration system.

Compliance with this requirement is ensured by documenting operating conditions and procedures in the O&M manual (Permit Conditions 3.6 and 3.7, and complying with pressure drop monitoring and recordkeeping requirements (Permit Condition 3.10).

Because a copy of the O&M manual was provided in the Tier I renewal application (T1-050025), including pressure drop indicator ranges, the initial requirements to *develop* the manual and pressure drop range were removed from these permit conditions, while retaining the ongoing requirement to maintain the manual and submit revisions to DEQ.

Permit Condition 3.8

This permit condition requires monitoring and recordkeeping of daily coating throughput.

Permit Condition 3.9

This permit condition requires monitoring and recordkeeping of annual coating throughput.

Permit Condition 3.10

This permit condition requires monitoring and recordkeeping of pressure drop for the filtration system.

Permit Condition 3.11

This permit condition requires onsite recordkeeping of required monitoring (Permit Conditions 3.8 through 3.10).

Revised Permit Condition 4.1

This permit condition references the facility-wide VOC emission limit (see Permit Condition 2.13).

This permit condition was revised only to clarify that the referenced condition is an emissions limit, and for consistency with the language used in Permit Condition 3.3.

Revised Permit Condition 4.2

This permit condition requires a minimum stack height for the three coating process vent stacks.

This permit condition was revised only to remove the reference to the original 60-day compliance deadline, which has already passed.

Revised Permit Condition 4.3

This permit condition limits daily and annual coating material throughputs in the molding coating processes.

Refer to the Application Scope section (Table 2) for a summary of permit limit revisions, including specific coating usage limits.

The facility-wide VOC annual emission limit (Permit Condition 2.13), as well as annual usage limits for coating materials (Permit Conditions 3.5 and 4.3), are considered synthetic minor limits to limit both HAP and VOC emissions to below major source thresholds. Development of the emissions inventories and preconstruction compliance with TAP screening emission levels assumes compliance with these limits.

Compliance with this limit is ensured by complying with monitoring and recordkeeping (Permit Condition 4.5).

Refer to the Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70) and PSD Classification (40 CFR 52.21) sections for additional information.

Removed Permit Condition 4.3 (P-060032)

Daily emissions of toluene were considered inherently limited by daily coating material throughput limits (Permit Condition 4.3). As a result, this emission limit was no longer considered necessary, and was removed.

Permit Condition 4.4

This permit condition requires monitoring and recordkeeping of daily coating throughput.

Permit Condition 4.5

This permit condition requires monitoring and recordkeeping of annual coating throughput.

Permit Condition 4.6

This permit condition requires onsite recordkeeping of required monitoring (Permit Conditions 4.4 through 4.5).

Removed the Summary of Emission Rate Limits Table

It was considered redundant to restate emission limits included elsewhere in the permit; this table was removed.

Permit Condition 5.1

The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

Permit Condition 5.2

The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

Permit Condition 5.3

The obligation to comply general compliance provision specifies that no permit condition be intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

Existing permit condition 2.11 was removed, as it duplicated the requirements of this general provision.

Permit Condition 5.4

The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

Permit Condition 5.5

The permit expiration construction and operation provision specifies that the permit will expire if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

Permit Condition 5.6

The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.03.

Permit Condition 5.7

The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

Permit Condition 5.8

The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

Permit Condition 5.9

The performance test reporting provision requires that the permittee report any performance test results to DEQ within 30 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

Permit Condition 5.10

The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

Permit Condition 5.11

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

Permit Condition 5.12

The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

Permit Condition 5.13

The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

Permit Condition 5.14

The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

Permit Condition 5.15

The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

Permit Condition 5.16

The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c. During this time, there were no comments on the application and there was not a request for a public comment period on DEQ's proposed action. Refer to the Application Chronology section for public comment opportunity dates for public comment opportunity dates.

APPENDIX A – FACILITY-WIDE EMISSION INVENTORIES

Source	Pollutant															
	PM		PM-10		VOC[c]		SO_2		NO_X		CO		Lead		HAPs	GHG
	lb/hr	ton /yr	lb/hr	ton /yr	lb/hr	ton/yr	lb/hr	ton /yr	lb /hr	ton /yr	lb /hr	ton /yr	lb/hr	ton /yr	ton/yr	metric T/yr $CO2_e$
Spray Booth	0.79	1.73	0.79	1.73	6.30	13.86									na	
Roll Coater # 1					3.52	1.51									0.79	
Fan Coater # 1						7.43									4.62	
Fan Coater # 2					13.25	3.11									0.34	
Fan Coater # 3						2.92									1.23	
Fan Coater # 4A					18.22	10.35									1.14	
Fan Coater # 4B						2.57									na	
Printer # 1					28.3	17.5									3.4	
Acetone Storage Tank[a]															na	
5005 Thinner Storage Tank[b]					0.0045	0.020									0.003	
Oven Heaters 1-8	0.008	0.04	0 008	0.04	0.01	0.03	0.0007	0 003	0.11	0.48	0.09	0.40	5.5E-07	2.4E-06	0.01	761.91
Space Heaters 1-5	0.004	0 016	0 004	0.016	0.003	0.012	0.0003	0 001	0.05	0.21	0.04	0.18	2.5E-07	1.1E-06	0.004	
TOTAL	**0.80**	**1.78**	**0.80**	**1.78**	**69.56**	**59.32**	**0.001**	**0.004**	**0.16**	**0.70**	**0.13**	**0.58**	**7.9E-07**	**3.5E-06**	**11.55**	**761.91**

[a] Acetone is not a VOC

[b] Does not contain the acetone fraction

[c] Ton/yr emissions are based on requested coating/solvent throughputs and lb/hr emissions are based on worst case emissions based on fan coater configura ions outlined below:
Fan coaters No.2 and No.3 are in parallel and therefore are unable to operate simultaneously; worst case emissions are from Fan coater No.2
Fan coaters No.1 and No.4 are in parallel and therefore are unable to operate simultaneously; worst case emissions are from Fan coater No.4A

HAP Summary	CAS No.	ton/yr
Arsenic	7440-38-2	1.39E-06
Benzene	71-43-2	1.46E-05
Beryllium	7440-41-7	8.35E-08
Cadmium	7440-43-9	7.65E-06
Chromium	7440-47-3	9.74E-06
Cobalt	7440-48-4	5.84E-07
Cumene	98-82-8	0.001
Ethyl benzene	100414	0.23
Formaldehyde	50-00-0	5.22E-04
Hexane	110-54-3	1.25E-02
Manganese	7439-96-5	2.64E-06
Mercury	7439-97-6	1.81E-06
Methyl alcohol	67-56-1	0.72
Methyl isobutyl ketone	108-10-1	0.70
Nickel	7440-02-0	1.46E-05
Naphthalene	91-20-3	4.24E-06
Selenium	7782-49-2	1.67E-07
PAH		1.32E-05
Phenoxyethanol	122996	0.01
Toluene	108883	8.83
Xylene	1330207	1.04
	Total	**11.55**

TAPs Summary	CAS No.	lb/hr	EL lb/hr	Exceeds EL Y/N	AAC (mg/m3) (24 avg)
Acetone	67641	100.70	119	N	89
Butanol	71363	0.45	10	N	7.5
Butyl acetate	123864	9.73	47.3	N	35.5
Calcium Carbonate	13765-19-0	0.12	0.667	N	0.5
Cumene	98-82-8	0.0009	16.3	N	12.25
Dipropylene glycol methyl ether	34590-94-8	1.47	40	N	30
Ethyl Acetate	141786	1.74	93.3	N	70
Ethyl alcohol	64-17-5	0.02	126	N	94
Ethyl benzene	100414	0.36	29	N	21.75
2-Butoxyethanol (Glycol Ether)	111762	1.965	8	N	6
Isobutyl Acetate	110-19-0	12.20	46.7	N	35
Isobutyl Alcohol	78831	1.11	10	N	6
Isopropanol	67630	10.00	65.3	N	49
Ligroine (VM & P Naphtha)	8032324	0.40	91.3	N	68.5
Methyl Alcohol	67-56-1	1.16	17.3	N	13
Methyl Ethyl Ketone	78933	3.92	39.3	N	29.5
Methyl Isobutyl Ketone	108-10-1	1.11	13.7	N	10.25
Methyl n-Amyl Ketone	110430	1.16	15.7	N	11.75
Methyl Propyl Ketone	107879	5.99	46.7	N	35
Quartz	14808-60-7	8.90E-04	0.0067	N	0.005
Stoddard Solvent (mineral spirits)	8052413	0.93	35	N	26.25
Toluene	108883	13.18	25	N	18.75
Trimethylbenzene (mixed isomers)	25551-13-7	0.01	8.2	N	6.15
Xylene	1330207	1.62	29	N	21.75

* lb/hr emissions over overestimated because it does not take into consideration actual configuration of equipment.
Actual hourly maximum emissions would be lower for some pollutants based on equipment operation outlined below:
Fan coaters No.2 and No.3 are in parallel and therefore are unable to operate simultaneously
Fan coaters No.1 and No.4 are in parallel and therefore are unable to operate simultaneously

Natural Gas TAP Summary[a]	CAS No.	lb/hr	EL lb/hr	Exceeds EL Y/N
Arsenic	7440-38-2	3.18E-07	1.50E-06	N
Barium	7440-39-3	6.99E-06	3.30E-02	N
Benzene	71-43-2	3.34E-06	8.00E-04	N
Benzo(a)pyrene	50-32-8	1.91E-09	2.00E-06	N
Beryllium	7440-41-7	1.91E-08	2.08E-05	N
Cadmium	7440-43-9	1.75E-06	3.70E-06	N
Chromium	7440-47-3	2.22E-06	3.30E-02	N
Cobalt	7440-48-4	1.33E-07	3.30E-03	N
Copper	7440-50-8	1.35E-06	1.30E-02	N
Formaldehyde	50-00-0	1.19E-04	5.10E-04	N
Hexane	110-54-3	2.86E-03	12	N
Manganese	7439-96-5	6.04E-07	6.70E-02	N
3-Methylcholanthrene	56-49-5	2.86E-09	2.50E-06	N
Molybdenum	7439-98-7	1.75E-06	3.33E-01	N
Naphthalene	91-20-3	9.69E-07	3.33	N
Naphthalene	91-20-3	9.69E-07	9.10E-05	N
Nickel	7440-02-0	3.34E-06	2.70E-05	N
Pentane	109-66-0	4.13E-03	118	N
POM (7-PAH)	N/A	1.81E-08	2.00E-06	N
Selenium	7782-49-2	3.81E-08	1.30E-02	N
Vanadium	1314-62-1	3.65E-06	3.00E-03	N
Zinc	7440-66-6	4.61E-05	6.67E-01	N

a. Toluene is a TAP included in natural gas. However, the natural gas component was added to the value in the table above.