Uncontrolled Potential Emissions

			ı	nformation I	Provided by F	acility	Р	М	Р	M ₁₀	S	iO ₂	C	0	v	ос	N	IOx	HAI)s
Source No.	Emission Unit	Emission Source	Design Input (lbs./hr.)	Design Input (tons/hr.)	Flow Rate (cfm)	Design Heat Input (MMBtu/hr.)	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.
01	Forming	Forming Door Hardware	457	0.23		-	-	-		-	-			-	-	0.21	-	-	-	
	EPS Sandwich	EPS Foam Gluing		-			-	-	-		-			-	-	3.23	-	-	-	3.23
02	Doors	EPS Foam Imprinting		-	-		-	-			-				-	1.68	-	-	-	0.03
	Doors	Window Cutting		0.00	10600		6.85	30.00	-		-				-	-		-		-
		Polyurethane Foam Injection	3,741	1.87	21189		-	-	-		-	-	-		5.79	25.36	-	-	-	0.00
03	Injection Doors	Heat Tunnel (NG Burning)	-	-	-	0.61	0.00	0.02			0.00	0.00	0.05	0.22	0.00	0.01	0.06	0.26	-	-
		Sawing	3,741	1.87	3397	-	5.99	26.22		-	-	-	-		0.12	0.54	-	-	-	-
04	Paint	Paint Spraying	15	0.01	12600	-	2.54	11.13	-		-	-		-	3.62	15.86	-	-	-	
34		NG Burning - Curing & Air Replacement	15	0.01	12600	5.50	0.04	0.18	-		0.00	0.01	0.45	1.98	0.03	0.13	0.54	2.36	-	
05		Blowing Agent Tank		-			-	-	-		-	-	-	-	1.65	7.24	-	-	-	
TOTAL EMIS	SIONS:						15.42	67.55	0.00	0.00	0.00	0.02	0.50	2.21	11.22	54.26	0.60	2.63		3.26

Controlled Emissions

			li li	nformation	Provided by Fa	cility	P	М	PI	M ₁₀	S	02	C	0	V	DC	N	IOx
Source No.	Emission Unit	Emission Source	Design Input (lbs./hr.)	Design Input (tons/hr.)	Flow Rate (cfm)	Design Heat Input (MMBtu/hr.)	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.
01	Forming	Forming Door Hardware	457	0.23	-	-		-	-	-	-		-	-	-	0.21	-	-
	EPS Sandwich	EPS Foam Gluing		-		-	-	-	-		-					3.23	-	
02	Doors	EPS Foam Imprinting		-	-	-	-	-						-	-	1.68	-	
	Doors	Window Cutting		0.00	10600	0.00	0.01	0.03	-		-				-		-	-
		Polyurethane Foam Injection	3,741	1.87	21189	-	-	-	-		-				5.79	25.36	-	
03	Injection Doors	Heat Tunnel (NG Burning)	-	-	-	0.61	0.00	0.02	-		0.00	0.00	0.05	0.22	0.00	0.01	0.06	0.26
		Sawing	3,741	1.87	3397	-	0.00	0.01	-		-			-	0.12	0.54	-	
04	Paint	Paint Spraying	15	0.01	12600	-	1.78	7.79		-	-			-	3.62	15.86	-	
04		NG Burning - Curing & Air Replacement	15	0.01	12600	5.50	0.04	0.18	-	-	0.00	0.01	0.45	1.98	0.03	0.13	0.54	2.36
05	05 Tank Blowing Agent Tank					_	-	-		-	-			-	1.65	7.24	-	
TOTAL EMIS	ITAL EMISSIONS:						1.83	8.03	0.00	0.00	0.00	0.02	0.50	2.21	11.22	54.26	0.60	2.63

15.99 Allowable PM Emissions

			li	nformation I	Provided by Fa	acility	Calculations		C Chapter 7: Pro Regulations	cess Emission	Controlled	Potential PM	Uncontrolled	Potential PM		Allowable Limits	s	ı
Source No. Em	mission Unit	Emission Source	Design Input (lbs./hr.)	Design Input (tons/hr.)	Flow Rate (cfm)	Design Heat Input (MMBtu/hr.)	PWR Table 2 (lbs./hr.)	0.02 gr./dscf (lbs./hr.)	0.25 gr./dscf (lbs./hr.)	Emission per Chapter 7 Rules (lbs./hr.)	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.	Allowable (lbs./hr.)	Operating Hours	Allowable (tpy)	
02 EP	S Sandwich	Window Cutting		-		-	0.11	1.82	22.71	1.82	0.01	0.03	6.85	30.00	1.82	8760	7.96	Bas
03 Inie	action Doors	Heat Tunnel (NG Burning)		1.87	21189	-	5.29	3.63	45.41	5.29	0.00	0.02	0.00	0.02	5.29	8760	23.18	Base
os Inje	ection boors	Sawing	3741	1.87	3397		5.29	0.58	7.28	5.29	0.00	0.01	5.99	26.22	5.29	8760	23.18	Base
04	Paint	Paint Spraying	15	0.01	12600		0.17	2.16	27.00	2.16	1.78	7.79	2.54	11.13	2.16	8760	9.46	Base
04	railit	NG Burning - Curing & Air Replacement	15	0.01	12600	-	0.17	2.16	27.00	2.16	0.04	0.18	0.04	0.18	2.16	8760	9.46	Base
TOTAL EMISSION	NS:										1.83	8.03	15.42	67.55	16.72		73.25	ıl

Allowable SO2 Emissions

			-	nformation I	Provided by F	acility	TN APC Ch	apter 14: Control of Sulfur Diox	ride Emissions	Controlled	Potential SO2	Uncontrolled	Potential SO2	4	Allowable Limit	s	
Source No.	Emission Unit	Emission Source	Design Input (Ibs./hr.)	Design Input (tons/hr.)	Flow Rate (cfm)	Input	Non-Process Emission Source (lbs/hr)	Emissions	Emission per Chapter 14 Rules (lbs./hr.)	lbs./hr.	tons/yr.	lbs./hr.	tons/yr.	Allowable (lbs./hr.)	Operating Hours	Allowable (tpy)	
03	Injection Doors	Heat Tunnel (NG Burning)		-		0.61	-	431.96	431.96	0.00	0.00	0.00	0.00	431.96	8760	1,891.96	Based on 12
04	Paint	NG Burning - Curing & Air Replacement		-		5.50	-	256.86	256.86	0.00	0.01	0.00	0.01	256.86	8760	1,125.05	Based on 12
TOTAL EMIS	SIONS:									0.00	0.02	0.00	0.02	688.82		3017.02	j

1200-03-14-.03(3) 1200-03-14-.03(3)

Permitted Emissions

			lı	nformation	Provided by Fa	acility	fr:		olled Potential					Facility Agr	eed Upon Pern	nitted Limits						
Source No.	Emission Unit	Emission Source	Design Input (lbs./hr.)	Input	Max. Annual Throughput (tons/yr.)	Throughput Restriction (tons/yr.)	[Limit (tpy)] / [Design Input (tons/hr.)] (hrs./yr.)	lbs./hr.	tons/yr.	PM (lbs./hr.)	PM (tons/yr.)	PM ₁₀ (lbs./hr.)	PM ₁₀ (tons/yr.)	SO2 (lbs./hr.)	SO2 (tons/yr.)	CO (lbs./hr.)	CO (tons/yr.)	VOC (lbs./hr.)	VOC (tons/yr.)	NOX (lbs./hr.)	NOX (tons/yr.)	
01	Forming	Forming Door Hardware	457	0.2		-	-	-		-							-		-			INSIGNIFI
	EPS Sandwich	EPS Foam Gluing		-		-	-	-						-		-	-					
02	Doors	EPS Foam Imprinting		-		-	-	-	-	1.82	7.96			-	-	-	-	4.9	21.5			ı
	Doors	Window Cutting		0.0	10,600.0	-	-	0.01	0.03					-			-					1
		Polyurethane Foam Injection	3,741	1.9	21189.0	-	-	-	-			-		-	-							ı
03	Injection Doors	Heat Tunnel (NG Burning)		-		-	-	0.00	0.02	5.3	23.2			-		0.1	0.2	5.9	25.9	0.1	0.3	ı
		Sawing	3,741	1.9	3397.0	-	-	0.00	0.01					-							4 7	ı
04	Paint	Paint Spraying	15	0.0	12600.0	-	-	1.78	7.79	-	-	-		-	-	-	-	-	-			ı
34	· ant	NG Burning - Curing & Air Replacement	15	0.0	12600.0	-	-	0.04	0.18	-	-	-		-	-	-	-	-	-			
05	Tank	Blowing Agent Tank		-		-	-	-		-	-	-		-	-	-	-	-	-		-	ı
TOTAL EMIS	SIONS:							1.83	8.03	7.11	31.14	31.14 0.00 0.00 0.00 0.00 0.05 0.22 10.82 47.40 0.06 0.26						1				

1/23/2023

Source 01: Forming Door Hardware

Operation Hours: 24 hrs./day [Application dated September Lubricant Volume (ga Density (lb/gal) Amount (lbs)

 7 days/wk.
 [Application dated September 921 DS
 55
 7.089
 389.895

 52 wk./yr.
 [Application dated September 251 Roll
 10
 6.672
 66.72

365 days/yr. [Application dated September 17, 2018] Total: 456.615

Actual Operating Hours: 8,760 hrs./yr.
Potential Operating Hours: 8,760 hrs./yr.

Design Input: 457 lbs/yr [Application dated September 17, 2018]

0.2283075 tons/hr.

Flow Rate for Control Device: N/A ft³/min. [Application dated September 17, 2018]

Calculated Emissions (VOC Mass Balance)

921 DS 1MO

389.895 lbs/yr

90% VOC Content [Application dated September 17, 2018]

350.9055 lbs/yr 0.18 tpy

251 Roll Film

66.72 lbs/yr

99% VOC Content [Application dated September 17, 2018]

66.0528 lbs/yr 0.03 tpy

Total VOC: 0.21 tpy

1/23/2023

Source 02: EPS Foam Imprinting & Gluing

Operation Hours: 24 hrs./day [Application dated September 17, 2018]

7 days/wk. [Application dated September 17, 2018] 52 wk./yr. [Application dated September 17, 2018]

365 days/yr. [Application dated September 17, 2018]

Actual Operating Hours: 8,760 hrs./yr. Potential Operating Hours: 8,760 hrs./yr.

Production Rate: 75,000 doors/yr [Application dated January 11, 2023] ***"Sandwich" doors o

Maximum Glue Input: 140,040 lbs/yr [Application dated September 17, 2018]

70.02 tons/yr

Flow Rate: 10,600 ft³/min. [Application dated September 17, 2018]

Calculated Emissions (Gluing)

PURMELT Adhesive

123,840 lbs/yr Material usage

5% VOC-HAP content [Application dated September 17, 2018]
6192.00 lbs/yr HAP-VOC Methylenebis(phenylisocyanate) [MDI]

3.10 tpy HAP-VOC

TEROSON Adhesive

0.216 lbs/door Material usage [Application dated January 11, 2023]

16,200 lbs/yr Material usage

1.62% VOC content [Application dated January 11, 2023]
262.44 lbs/yr HAP-VOC Methylenebis(phenylisocyanate) [MDI]

0.13 tpy HAP-VOC

3.23 tpy HAP-VOC Emissions Above HAP significance threshold

Calculated Emissions (EPS Foam) [Provided by Facility]

75,000 doors/yr Production rate

24 impressions/door [Application dated September 17, 2018]
0.0334 loss/impression (ft3) [Application dated September 17, 2018]

60,120 ft3/yr

1.50% additional losses [Application dated September 17, 2018]

61,022 ft3/yr EPS Losses

1.1 lbs/ft3 Density [Application dated September 17, 2018]
5% VOC Content [Application dated September 17, 2018]
0.10% HAP Content (styrene) [Application dated September 17, 2018]

67123.98 lbs/yr EPS Losses

3356.199 lbs/yr VOC Emissions 1.6780995 tpy VOC Emissions

67.12398 lbs/yr HAP Emissions 0.03356199 tpy HAP Emissions

1/23/2023

Source 02: Sandwich Door Window Cutting

Operation Hours: 24 hrs./day [Application dated September 17, 2018]

7 days/wk. [Application dated September 17, 2018] 52 wk./yr. [Application dated September 17, 2018]

365 days/yr. [Application dated September 17, 2018]

Actual Operating Hours: 8,760 hrs./yr. Potential Operating Hours: 8,760 hrs./yr.

Design Input: 75,000 doors/year [Application dated January 11, 2023] ***"Sandwich" doors on

Material Input: 30 tpy [Application dated November 3, 2020]

0.003 tons/hr

Flow Rate for Dust Collector: 10,600 ft³/min. [Application dated September 17, 2018]

Process Weight Rate Table II:

Design Input < 30 tons/hr.

 $E = 3.59P^{0.62}$

E = 0.11 lbs./hr.

At 0.02 gr./dscf:

 $PM = \frac{(0.02 [gr./dscf])*(Flow Rate [ft^3/min.])*(60 [min./hr.])}{}$

7000 [lbs./gr.]

PM = 1.82 lbs./hr.

At 0.25 gr./dscf:

 $PM = \frac{(0.25 [gr./dscf])*(Flow Rate [ft^3/min.])*(60 [min./hr.])}{(0.25 [gr./dscf])*(Flow Rate [ft^3/min.])*(60 [min./hr.])}$

7000 [lbs./gr.]

PM = 22.71 lbs./hr.

Calculated Emissions (Mass Balance)

100% Particulate loading (from mass balance) [Application dated November 3, 2020]

6.849315068 lbs/hr Uncontrolled Emissions
30 tpy Uncontrolled Emissions

99.90% Dust collector efficiency [Application dated November 3, 2020]

0.006849315 lbs/hr Controlled Emissions
0.03 tpy Controlled Emissions

1/30/2023

Source 03: Polyurethane Foam Injection

Operation Hours: 24 hrs./day [Application dated January 11, 2023]

7 days/wk. [Application dated January 11, 2023] 52 wk./yr. [Application dated January 11, 2023]

365 days/yr. [Application dated January 11, 2023]

Actual Operating Hours: 8,760 hrs./yr. Potential Operating Hours: 8,760 hrs./yr.

Production Rate: 105,000 doors/yr [Application dated January 11, 2023] ***"Polyurethane Injection Doors"

Input 1: Pentane 77.2 lbs/hr [Application dated January 11, 2023]
Input 2: MDI 2,282 lbs/hr [Application dated September 17, 2018]
Input 3: Polyol 1,382 lbs/hr [Application dated January 11, 2023]

Total Material Input: 3,741 lbs/hr

1.87065 tons/hr

Flow Rate: 21,189 ft³/min. [Application dated September 17, 2018]

Calculated Emissions (Facility Data)

Pentane

77.2 lbs/hr Material usage

7.5% loss fraction [Application dated September 17, 2018]

5.79 lbs/hr Pentane VOC 25.36 tpy Pentane VOC

MDI

From "MDI Emissions Reporting Guidelines for the Polyurethanes Industry" Section 10.0, "Stack Emissions of MDI from Doc

$$L_c = (\frac{v_{air} P_{vap} T_o}{v_{gas} P_o T_P}) M_w k$$

$v_{air} =$	1,470,000.00 ft3/yr	[Application dated September 17, 2018]
$v_{gas} =$	359.00 ft3/lb*m	ole [Application dated September 17, 2018]
P _{vap} =	0.0014 mmHg N	IDI [Application dated September 17, 2018]
P _o =	760 mmHg a	r [Application dated September 17, 2018]
T _o =	273 K	[Application dated September 17, 2018]
$T_p =$	343.15 K	[Application dated September 17, 2018]
M _w =	250.26 MDI	[Application dated September 17, 2018]
k =	0.659	[Application dated September 17, 2018]

 L_c = 0.961927318 lbs/yr MDI VOC-HAP $L_{c,max}$ = 1.106216416 lbs/yr MDI VOC-HAP 0.000553108 tpy MDI VOC-HAP

Total VOC

5.79 lbs/hr 25.36 tpy 93-0118 1/30/2023

Source 03: Heat Tunnel (NG-Fired)

> Operation Hours: 24 hrs./day [Application dated January 11, 2023]

7 days/wk. [Application dated January 11, 2023] 52 wk./yr. [Application dated January 11, 2023]

365 days/yr. [Application dated January 11, 2023]

Actual Operating Hours: 8,760 hrs./yr. Potential Operating Hours: 8,760 hrs./yr.

> 0.614 MMBtu/hı [Application dated January 11, 2023] 1.871 tons/hr **from Tab 03 Injection Heat Input Rate:

Material Input Rate:

Date Constructed: [Application dated January 11, 2023]

21,189 ft³/min. [Application dated September 17, 2018] Flow Rate:

Allowable Emissions

Process Weight Rate Table II:

Design Input < 30 tons/hr.

E = 3.59P^{0.62}

E = _ 5.29 lbs./hr.

At 0.02 gr./dscf:

PM = (0.02 [gr./dscf])*(Flow Rate [ft³/min.])*(60 [min./hr.])

7000 [lbs./gr.]

PM = 3.63 lbs./hr.

At 0.25 gr./dscf:

PM = (0.25 [gr./dscf])*(Flow Rate [ft³/min.])*(60 [min./hr.])

7000 [lbs./gr.]

PM = 45.41 lbs./hr.

TAPCR 1200-03-14-.03(3)

Class VI County

2000.0 ppmv

2911.4 ppmw Assume 100% conversion to SO2 has occurred, use SO2 MW

148365.38 lbs/hr total air outflow

431.9553 lbs/hr SO2 outflow

1891.9642 tons/yr

E = 0.600

Potential Emissions

Pollutant		MMBtu/hr.		lb./MMBtu		lbs./hr.		hr./yr.		lbs./ton		ton/yr.
PM	=	0.614	х	0.007451		0.00	х	8,760	/	2,000	=	0.02
SO ₂	=	0.614	х	0.000588	=	0.0004	х	8,760	/	2,000	=	0.002
со	=	0.614	х	0.082353	=	0.05	х	8,760	/	2,000	=	0.22
VOC	=	0.614	Х	0.005392	=	0.00	х	8,760	/	2,000	=	0.01
NO _x	=	0.614	x	0.098039	=	0.06	х	8.760	/	2.000	=	0.26

AP 42, Chapter 1.4: Natural Gas Combustion

Tables 1.4-1 and 1-4-2

Pollutant	Emission Factor		Coversion Factor	Factor
Foliutalit	(lbs./ 10 ⁶ scf)		(Btu/ft ³)	(lbs./MMBtu)
PM	7.6	/	1020	0.00745098
SO ₂	0.6	/	1020	0.000588235
CO	84	/	1020	0.082352941
voc	5.5	/	1020	0.005392157
NO _X	100	/	1020	0.098039216

93-0118 1/30/2023

Source 03: Injection Door Sawing

Operation Hours: 24 hrs./day [Application dated September 17, 2018]

7 days/wk. [Application dated September 17, 2018] 52 wk./yr. [Application dated September 17, 2018]

365 days/yr. [Application dated September 17, 2018]

Actual Operating Hours: 8,760 hrs./yr. Potential Operating Hours: 8,760 hrs./yr.

Design Input: 105,000 doors/yr [Application dated January 11, 2023] ***"Polyurethane Injection Doors"

Material Input: 3,741 lbs/hr **from Tab 03 Injection

1.871 tons/hr

Flow Rate for Baghouse: 3,397 dsft³/min. [Application dated September 17, 2018]

Process Weight Rate Table II:

Design Input < 30 tons/hr.

 $E = 3.59P^{0.62}$

E = 5.29 lbs./hr.

At 0.02 gr./dscf:

 $PM = \frac{(0.02 [gr./dscf])*(Flow Rate [ft^3/min.])*(60 [min./hr.])}{}$

7000 [lbs./gr.]

PM = 0.58 lbs./hr.

At 0.25 gr./dscf:

(0.25 [gr./dscf])*(Flow Rate [ft³/min.])*(60 [min./hr.])

7000 [lbs./gr.]

PM = 7.28 lbs./hr.

Calculated Emissions (Mass Balance)

0.16% Product volume loss [Application dated September 17, 2018]

5.98608 lbs/hr Uncontrolled PM Emissions (assumes 100% lost material is particulate foam**)

26.2190304 tpy Uncontrolled PM Emissions

99.95% Baghouse efficiency [Additional information dated January 31, 2023]

0.00299304 lbs/hr Controlled Emissions 0.013109515 tpy Controlled Emissions

0.16% Product volume loss [Application dated September 17, 2018]
0.12352 lbs/hr VOC Emissions (assumes 100% lost material is pentane**)

0.54 tpy VOC Emissions

^{**} while both cannot be true, must assume so without analysis of lost material

Hormann LLC

93-0118 1/23/2023

Source 04: Paint Application

> 24 hrs./day [Application dated September 17, 2018]

7 days/wk. 52 wk./yr. [Application dated September 17, 2018] [Application dated September 17, 2018]

365 days/yr [Application dated September 17, 2018]

Actual Operating Hours: 8,760 hrs./yr. Potential Operating Hours: 8,760 hrs./yr.

> 14.6 lbs/hr 0.0073 tons/hr. Design Input: [Application dated September 17, 2018]

Heat Input Rate:

5.5 MMBtu/hr [Application dated September 17, 2018]
**Includes both curing oven and replacement air, single fuel-burning installation

12,600 ft³/min. Flow Rate for Control Device: [Application dated September 17, 2018]

Process Weight Rate Table II: Design Input < 30 tons/hr. $E = 3.59P^{0.62}$

0.17 lbs./hr. E =

At 0.02 gr./dscf:

PM = (0.02 [gr./dscf])*(Flow Rate [ft³/min.])*(60 [min./hr.])

7000 [lbs./gr.]

PM = 2.16 lbs./hr.

At 0.25 gr./dscf:

PM = (0.25 [gr./dscf])*(Flow Rate [ft³/min.])*(60 [min./hr.])
7000 [lbs./gr.]

27.00 lbs./hr. PM =

TAPCR 1200-03-14-.03(3)

Class VI County 2000.0 ppmv

2911.4 ppmw Assume 88225.2 lbs/hr total air outflow Assume 100% conversion to SO2 has occurred, use SO2 MW

256.8614253 lbs/hr SO2 outflow

1125.053043 tons/yr

Calculated Emissions (PM & VOC Mass Balance)

14.6 lbs/hr 24.8% VOC Content [Application dated September 17, 2018]

58.0% Solids Content [Application dated September 17, 2018] [Application dated September 17, 2018] 30.0% Overspray 30.0% Control efficiency [Additional info email dated January 23, 2022]

3.6208 lbs/hr VOC emissions

15.86 tpy VOC emissions

2.54 lbs/hr Uncontrolled PM emissions 11.13 tpy 1.78 lbs/hr Uncontrolled PM emissions

Controlled PM emissions

7.79 tpy Controlled PM emissions

NG Burning Emissions

Pollutant		MMBtu/hr.	It	./MMB	tu	lbs./hr.		hr./yr.		lbs./ton		ton/yr.
PM	Ξ	5.500	х	0.007	=	0.04	х	8,760	/	2,000	=	0.18
SO ₂	=	5.500	х	6E-04	=	0.0032	х	8,760	/	2,000	=	0.014
со	=	5.500	х	0.082	=	0.45	х	8,760	/	2,000	=	1.98
VOC	=	5.500	х	0.005	-	0.03	х	8,760	/	2,000	-	0.13
NO _x	=	5.500	х	0.098	=	0.54	х	8,760	/	2,000	=	2.36

AP 42, Chapter 1.4: Natural Gas Combustion

Factor (lbs./MM Pollutant Factor PM 7.6 1020 0.007451 SO₂ 0.6 1020 0.000588 84 со 1020 0.082353 voc 1020 0.005392 NO_x 1020 0.098039

93-0118 1/23/2023

Source 05: Blowing Agent Tank

Operation Hours: 24 hrs./day [Application dated September 17, 2018]

7 days/wk. [Application dated September 17, 2018]
52 wk./yr. [Application dated September 17, 2018]

365 days/yr. [Application dated September 17, 2018]

[**Application dated September 17, 2018]

Actual Operating Hours: 8,760 hrs./yr. Potential Operating Hours: 8,760 hrs./yr.

Tank Volume: 12,000 gal [Application dated September 17, 2018]

Calculated Emissions (VOC)

12,000 gal Tank volume

100% VOC Content [Application dated September 17, 2018]

"Fugitive VOC Emissions in the Synthetic Organic Chemical Manufacturing Industry", December 1984 (EPA-625/10-84-004) Table 3 Emission Factors

Component # of Components** EF (kg/hr/comp) Emissions (kg/hr) 0.0071 Valves 12 0.0852 **Pump Seals** 2 0.0494 0.0988 **Line Connections** 27 0.0017 0.0459 5 **Relief Valves** 0.104 0.52

> 0.7499 kg/hr 1.65322954 lbs/hr

1.65322954 lbs/hr VOC Emissions 7.241145385 tpy VOC Emissions