

Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

OCT 23 2019

Ms. Michelle Pike
Controller
Construction Trailer Specialists, Inc.
2535 Rose Pkwy
Sikeston, Missouri 63801

RE: New Source Review Permit - Project Number: 2019-07-027

Dear Ms. Pike:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.



Recycled paper

If you have any questions regarding this permit, please do not hesitate to contact Russell Osborne, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



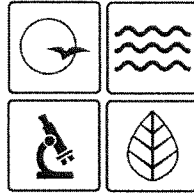
Susan Heckenkamp
New Source Review Unit Chief

SH:roa

Enclosures

c: Southeast Regional Office
PAMS File: 2019-07-027

Permit Number:



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **102019-012** Project Number: 2019-07-027
Installation Number: 201-0110

Parent Company: Construction Trailer Specialists, Inc.

Parent Company Address: 2535 Rose Pkwy, Sikeston, Missouri 63801

Installation Name: Construction Trailer Specialists, Inc.

Installation Address: 2535 Rose Pkwy, Sikeston, Missouri 63801

Location Information: Scott County, S8, T26N, R13E

Application for Authority to Construct was made for:

An allowance of coatings with higher volatile organic compound (VOC) content used in spray booth (EP-03) and establishment of a plant wide 250 ton per year VOC limit. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

-
- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

Randall B. Hale

Director or Designee
Department of Natural Resources

OCT 23 2019

Effective Date

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Enforcement and Compliance Section of the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit using the contact information below.

Contact Information:

Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
<http://dnr.mo.gov/regions/>

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted to the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (3)(E). "Conditions required by permitting authority."

Construction Trailer Specialists, Inc.
Scott County, S8, T26N, R13E

1. Superseding Condition

The Special Conditions of this permit supersede Special Condition 2 found in the previously issued Construction Permit #052007-001 issued by the Air Pollution Control Program.

2. VOC Emission Limitations

A. Construction Trailer Specialists, Inc. shall emit less than 250 tons of VOCs in any consecutive 12-month period from the entire installation. This limit applies to all pieces of equipment listed in Table 1 below.

Table 1: Emission Points

Emission Point	
EP-01	Welding
EP-02	Sand Blasting
EP-03	Paint/Primer Spray Booth
EP-04	2.0 MMBtu/hr Natural Gas Fired Dryer

B. Attachment A and B or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 2.A.

3. Alternative Materials

A. Construction Trailer Specialists, Inc. is allowed to use alternative materials for the paint booth (EP-03) that are different from the materials listed in the Application for Authority to Construct.

B. The limits established by Special Condition 2.A shall include emissions from the use of any alternative materials. Their emissions shall be accounted for in the recordkeeping associated with this limit.

4. Operational Requirement – Sealed Containers

Construction Trailer Specialists, Inc. shall keep the all VOC and HAP containing solutions in sealed containers whenever the materials are not in use. Construction Trailer Specialists, Inc. shall provide and maintain suitable, easily read, permanent markings on all VOC and HAP containing solution containers.

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

5. Record Keeping and Reporting Requirements
 - A. Construction Trailer Specialists, Inc. shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.
 - B. Construction Trailer Specialists, Inc. shall report to the Air Pollution Control Program's Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by e-mail at AirComplianceReporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2019-07-027

Installation ID Number: 201-0110

Permit Number: 102019-012

Installation Address:

Construction Trailer Specialists, Inc.
2535 Rose Pkwy
Sikeston, Missouri 63801

Parent Company:

Construction Trailer Specialists, Inc.
2535 Rose Pkwy
Sikeston, Missouri 63801

Scott County, S8, T26N, R13E

REVIEW SUMMARY

- Construction Trailer Specialists, Inc. has applied for authority to allow coatings and materials with higher VOC content than previously permitted to be used in the spray booth (EP-03) and to establish a voluntary plant wide 250 ton per year VOC limit.
- The application was deemed complete on August 26, 2019.
- HAP emissions are expected from the equipment covered under this permit. HAPs of concern from this process are toluene, ethylbenzene, xylene, methanol, and HDI isocyanate, all of which exceed their associated *de minimis*/SMAL values. The facility is a major source of HAPs.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the NESHAPs apply to this installation.
- The Maximum Achievable Control Technology (MACT) standard, 40 CFR Part 63, Subpart M, *National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products*, applies to the proposed equipment. A Risk and Technology Review has been conducted for MACT, Subpart M.
- A paint booth with fabric filter is being used to control emissions of particulate matter (PM, PM₁₀, PM_{2.5}) from the paint booth (EP-03) in this permit.
- Ambient air quality modeling was not performed for this review. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions. In addition, ambient air quality modeling was not performed on HAPs since MACT, Subpart M applies.

- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs are above de minimis levels and conditioned below major source levels. Potential emissions of particulate matter (PM, PM₁₀, PM_{2.5}) are indirectly conditioned below *de minimis* levels. Potential HAP emissions exceed the major source thresholds. However, since MACT, Subpart M, applies this project is not subject to the requirements of Missouri Rule 10 CSR 10-6.060, Section (9), *Hazardous Air Pollutant Permits*
- This installation is located in Scott County, an attainment/unclassifiable area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Emissions testing is not required for the source unless otherwise directed by MACT, Subpart M.
- An update to the Part 70 Operating Permit is required for this installation within one year of issuance of this permit.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Construction Trailer Specialists Incorporated (“Construction Trailer Specialists”) located in Sikeston manufactures semi-trailers. The trailers consists of hopper trailers, bottom dump trailers, and van trailers that weigh between 11,000 lbs. and 15,000 Lbs. (5.5 tons – 7.5 tons). Customers utilize the manufactured trailers in various applications including but not limited to grain transporting (hopper bottom grain trailers) and waste handling (bottom dump).

The following NSR permits have been issued to Construction Trailer Specialists, Inc. from the Air Pollution Control Program.

Table 2: NSR Permit History

Permit Number	Description
012000-010	Installation of a semi-trailer manufacturing facility.
052007-001	Removal of the annual installation-wide 40 ton VOC limit

In Permit No. 012000-010, Construction Trailer Specialists, Inc. accepted an annual 40 ton VOC limit for the entire installation and therefore was not required to submit an Operating Permit. This limit was then removed by Permit No. 052007-001, making the installation major for HAPs, requiring the submission of a Part 70 Operating Permit application. By accepting the 250 ton per year limit in this permit, Construction Trailer Specialists, Inc. will remain a minor NSR source for VOCs and a major source of HAPs.

SO_x, NO_x, CO, VOCs, HAPs, PM, PM₁₀, and PM_{2.5} will be emitted as a result of the semi-trailer manufacturing activities that will be conducted at this site. Fabricated trailers are washed utilizing a 100% biodegradable soap and water. The washed trailers will be sand blasted and then painted in a paint booth (EP-03). The painted trailers will then be dried in a 2.0 MMBTU/hr natural gas fired dryer to complete the trailer construction.

A letter of warning (LOW) was issued to the installation on June 5, 2019. Department on Natural Resources staff discovered coatings with a higher VOC content than what were allowed by Permit No. 052007-001. On July 17, 2019, an Application for Authority to Construct was received for the LOW.

PROJECT DESCRIPTION

Construction Trailer Specialists, Inc. has applied for authority to allow for alternative materials and coatings with a higher VOC content than the materials previously permitted. In addition, Construction Trailer Specialists, Inc. has taken an installation-wide voluntary limit of 250 tons per year on VOCs. No new equipment will be constructed or installed.

The maximum hourly design rate for the spray guns within the spray booth (EP-03) is based on a maximum capacity of five (5) trailers being able to be painted in a 10-hour period at this facility. As provided by the applicant, the facility utilizes a maximum of 4.5 gallons of primer, 0.5 gallon of thinner, 2 gallons of gun wash, and 12.2 gallons of paint per trailer. Painted trailers will be dried either by forced heat or by air-drying. With forced heat, a two (2) MMBTU/hr burner that utilizes natural gas will be used. The only control device at the installation consists of a fabric filter located in the paint booth for controlling particulate matter (PM, PM₁₀, PM_{2.5}) emissions.

Please note that potential emissions are based on the maximum production capacity of 5 trailers in a 10-hour shift that was provided by the applicant. This installation could require a new construction permit if a modification to the operations occurs that may cause an increase in maximum production.

This installation is considered major for HAPs. The MACT, Subpart M applies to the equipment associated with this project. Therefore, this project is not subject to the requirements of Missouri Rule 10 CSR 10-6.060, Section (9), *Hazardous Air Pollutant Permits* even though the potential to emit for several individual HAPs and the combined HAPs exceed the major source levels of 10.0/25.0 tons per year, respectively.

EMISSIONS/CONTROLS EVALUATION

Particulate (PM, PM₁₀, and PM_{2.5}), VOC, and HAP emissions are expected from the use of coatings. For each pollutant, it was assumed that only the coating that resulted in the highest emissions for that pollutant was used. This would provide a conservative estimate of emissions.

The emissions determined for the spray booth (EP-03) were estimated using information obtained from the Safety Data Sheets (SDSs) and painting requirements for each semitrailer as provided by the applicant. A mass balance approach was used and 100% of the VOC and volatile HAP content of the paints, primers, gun wash, and thinner are assumed to be emitted into the atmosphere.

PM, PM₁₀, and PM_{2.5} emissions for the spray booth were evaluated based on the solids content of the paint and transfer efficiency from the spray gun (50%). The transfer efficiencies from the air-atomized gun came from APTI Course 482, *Sources and Control of Volatile Organic Air Pollutants*, Student Manual, 2002.

If not specifically stated, the solids content of the material was estimated by taking the density of the paint and subtracting the VOC content and assuming the remainder to be particulate. For permitting purposes, the solids content was conservatively assumed to be 100% particulate matter. From the updated CEIDARS table (September 2006), 96% of the particulate matter is calculated as PM₁₀ and 92.5% of the particulate matter is calculated as PM_{2.5}. A fabric filter is used to collect particulate emissions. The capture efficiency of the fabric filter for PM₁₀ and PM_{2.5} is 99%. The capture efficiency for PM is 99.5%. These values were obtained from EPA document AP-42 Appendix B.2 “Generalized Particle Size Distribution”.

The following table provides an emissions summary for this project. Existing potential emissions were taken from Permit No. 052007-001 and do not include the potential emissions from the coatings and materials with higher VOC content. The PTE of all criteria pollutants were recalculated in Permit No 052007-001. Existing actual emissions were taken from the installation’s 2018 EIQ. Potential emissions of the application represent the potential of the higher VOC containing coatings and materials used in the paint booth (EP-03), assuming continuous operation (8760 hours per year). A voluntary limit of 250 tons per year of VOCs was requested by Construction Trailer Specialists, Inc. The conditioned potential emissions are based upon the voluntary VOC limitation.

Table 3: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> / SMAL Levels	Existing Potential Emissions	Existing Actual Emissions (2018 EIQ)	Potential Emissions of the Project	New Installation Conditioned Potential
PM	25.0	N/D	N/R	0.93	0.93
PM ₁₀	15.0	3.90	0.39	1.78	5.68
PM _{2.5}	10.0	3.75	0.03	1.71	5.46
SO _x	40.0	0.01	0.00	N/D	N/D
NO _x	40.0	0.80	0.00	N/D	N/D
VOC	40.0	198.9	12.47	587.17	< 250.0
CO	100.0	0.7	0.00	N/D	N/D
Total HAPs	25.0	66.60	0.44	372.34	158.53
Toluene	10.0	N/D	0.01	84.10	35.81
Ethylbenzene	10.0	N/D	0.07	33.03	14.07

Pollutant	Regulatory <i>De Minimis</i> / SMAL Levels	Existing Potential Emissions	Existing Actual Emissions (2018 EIQ)	Potential Emissions of the Project	New Installation Conditioned Potential
Xylene Isomers	10.0	N/D	0.18	218.74	93.13
Methanol	10.0	N/D	N/R	35.51	15.12
HDI Isocyanate	0.02	N/D	N/R	0.95	0.40

N/R = Not Reported; N/D = Not Determined

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of the project are above de minimis levels but voluntarily conditioned below major source levels.

APPLICABLE REQUIREMENTS

Construction Trailer Specialists, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Operating Permits*, 10 CSR 10-6.065
- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

SPECIFIC REQUIREMENTS

- *MACT Regulations*, 10 CSR 10-6.075 *National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products*, 40 CFR Part 63, Subpart Mmmm

OTHER DETERMINATIONS

- *Restriction of Emissions of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400 does not apply because particulate matter emissions are controlled by a dust collection system that has an overall efficiency greater than 95% as stated in 10 CSR 10-6.400 (1)(B)14.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated July 17, 2019, received July 22, 2019, designating Construction Trailer Specialists, Inc. as the owner and operator of the installation.

Attachment A – VOC Compliance Worksheet

Construction Trailer Specialists, Inc.
 Scott County, S8, T26N, R13E
 Project Number: 2019-07-027
 Installation ID Number: 201-0110
 Permit Number: **102019-012**

Copy this sheet as needed.

This sheet covers the period from _____ to _____.
 (month, day, year) (month, day, year)

Table 4: Mass Balance Worksheet for Coating Operations:

A	B	C	D	E
Material Used, (Name) ¹	Amount of Material Used (Include Units) ²	Density (lbs/gal) ³	VOC Content (Weight %) ⁴	VOC Emissions (Tons) ⁵
F. Total VOC Monthly Emissions from Mass Balance Materials (tons/month)⁶:				

-
- 1 Record the name of each material used that contains a VOC as defined in 10 CSR 10-6.020.
 - 2 Record the usage and units of the material.
 - 3 Record the material density. If density is not provided, the permittee may calculate the density by using the specific gravity and the following equation:

$$(\text{specific gravity}) * \left(\frac{8.34 \text{ lbs}}{\text{gallon}}\right) = \left(\text{density} \frac{\text{lb}}{\text{gallon}}\right)$$
 - 4 Record the VOC content from the SDS. If VOC content has a range, then use the highest value.
 - 5 Calculate the VOC emissions by one of the following methods:
 - i. If the usage is in tons $(\text{Column B}) * (\text{Column D}) = \text{Column E}$
 - ii. If usage is in pounds $(\text{Column B}) * \left(\frac{\text{Column D}}{2000}\right) = \text{Column E}$
 - iii. If usage is in gallons $(\text{Column B}) * (\text{Column C}) * \left(\frac{\text{Column D}}{2000}\right) = \text{Column E}$
 - 6 Sum of Column E.

Attachment B – VOC Compliance Worksheet

Construction Trailer Specialists, Inc.
 Scott County, S8, T26N, R13E
 Project Number: 2019-07-027
 Installation ID Number: 201-0110
 Permit Number: 102019-012

Copy this sheet as needed.

This sheet covers the period from _____ to _____.
 (month, year) (month, year)

Table 5: 12-month total VOCs

G. Sum of Column F for this month (tons) ⁷ :	
H. SSM Emissions for this month (tons) ⁸ :	
I. Column L from previous month's worksheet (tons) ⁹ :	
J. Column G from previous year's worksheet (tons) ¹⁰ :	
K. Annual VOC Emissions (PTE) from Natural Gas Combustion (tons):	0.05
L. Current 12-month Total of VOC Emissions (tons)¹¹:	

7 Sum of all VOC emissions for this month.

8 SSM emissions for this month, as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050

9 This value is carried forward from the previous month's worksheet, and represents the 12 month total of VOC emissions as of the previous month.

10 This value is carried forward from the previous year's worksheet, and represents the monthly VOC emissions for the same month in the previous year.

11 Current 12-month total VOC emissions. Calculated using the following equation:

$(Column\ G) + (Column\ H) + (Column\ I) - (Column\ J) + (Column\ K) = Column\ L$. **A total of less than 250 tons indicates compliance.**

APPENDIX A

Abbreviations and Acronyms

%percent	Mgal1,000 gallons
°Fdegrees Fahrenheit	MWmegawatt
acfmactual cubic feet per minute	MHDRmaximum hourly design rate
BACTBest Available Control Technology	MMBtuMillion British thermal units
BMPsBest Management Practices	MMCFmillion cubic feet
BtuBritish thermal unit	MSDSMaterial Safety Data Sheet
CAM Compliance Assurance Monitoring	NAAQSNational Ambient Air Quality Standards
CASChemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMSContinuous Emission Monitor System	NO_xnitrogen oxides
CFRCode of Federal Regulations	NSPSNew Source Performance Standards
COcarbon monoxide	NSRNew Source Review
CO₂carbon dioxide	PMparticulate matter
CO_{2e}carbon dioxide equivalent	PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter
COMSContinuous Opacity Monitoring System	PM₁₀particulate matter less than 10 microns in aerodynamic diameter
CSRCode of State Regulations	ppmparts per million
dscfdry standard cubic feet	PSDPrevention of Significant Deterioration
EIQEmission Inventory Questionnaire	PTEpotential to emit
EPEmission Point	RACTReasonable Available Control Technology
EPAEnvironmental Protection Agency	RALRisk Assessment Level
EUEmission Unit	SCCSource Classification Code
fpsfeet per second	scfmstandard cubic feet per minute
ftfeet	SDSSafety Data Sheet
GACTGenerally Available Control Technology	SICStandard Industrial Classification
GHGGreenhouse Gas	SIPState Implementation Plan
gpmgallons per minute	SMALScreening Model Action Levels
grgrains	SO_xsulfur oxides
GWPGlobal Warming Potential	SO₂sulfur dioxide
HAPHazardous Air Pollutant	SSMStartup, Shutdown & Malfunction
hrhour	tphtons per hour
hphorsepower	tpytons per year
lbpound	VMTvehicle miles traveled
lbs/hrpounds per hour	VOCVolatile Organic Compound
MACTMaximum Achievable Control Technology	
µg/m³micrograms per cubic meter	
m/smeters per second	

Source	Production (trailers/day)	MHDR (gal/hr)
Spray Gun (EP-03)	4	13

Material	MHDR (gal/hr)
CTSGrayPrimerE2W34851/E2B1738	13
Sherwin-Williams /1738/ Black	13
Thinnner 33	13
Gun Wash	13
Carbothane 8815 Part A	13
Carbocoat 45 Industrial Enamel	13
Purge Solvent	13
Sher-Will-Clean Wax and Grease Remover	13
Genesis Reducer	13
Genesis Standard Accelerator	13
Genesis Reducer Low VOC Solvent - Fast Fast	13
Urethane Converter 8800	13

Material	Density (lbs/gal)	VOC (wt %)	Solids (wt%)	Toluene (108-88-3)	Ethylbenzene (100-41-4)	Xylene (1330-20-7)	Methanol (67-56-1)	HDI Isocyanate (822-06-0)
CTSGrayPrimerE2W34851/E2B1738	13.17	78%	22%	0.00%	0.00%	0.00%	0.00%	0.00%
Sherwin-Williams /1738/ Black	7.84	84%	16%	1.00%	7.40%	49.00%	0.00%	0.00%
Thinnner 33	7.42	99%	1%	0.00%	1.00%	0.00%	0.00%	0.00%
Gun Wash	6.93	100%	0%	10.00%	1.00%	5.00%	9.00%	0.00%
Carbothane 8815 Part A	9.70	34%	66%	0.00%	2.50%	2.50%	0.00%	0.00%
Carbocoat 45 Industrial Enamel	10.01	35%	65%	0.00%	2.50%	15.00%	0.00%	0.00%
Purge Solvent	6.67	100%	0%	0.00%	0.00%	0.00%	0.00%	0.00%
Sher-Will-Clean Wax and Grease Remover	6.42	100%	0%	23.00%	0.00%	0.00%	0.00%	0.00%
Genesis Reducer	7.51	100%	0%	0.00%	0.00%	0.00%	0.00%	0.00%
Genesis Standard Accelerator	8.09	90%	10%	0.00%	0.00%	0.00%	0.00%	0.00%
Genesis Reducer Low VOC Solvent - Fast Fast	6.59	90%	10%	0.00%	0.00%	0.00%	0.00%	0.00%
Urethane Converter 8800	8.34	40%	60%	0.00%	0.00%	5.00%	0.00%	0.20%

Material	VOC E (tpy)	Transfer	Potential Emissions (tpy)			Control Device	Control Device Efficiency (%)		
			PM	PM ₁₀	PM _{2.5}		PM	PM ₁₀	PM _{2.5}
CTSGrayPrimerE2W34851/E2B1738	587.17	50%	81.36	78.11	75.26	Fabric Filter	99.5%	99.0%	99.0%
Sherwin-Williams /1738/ Black	374.98	50%	35.71	34.28	33.03	Fabric Filter	99.5%	99.0%	99.0%
Thinnner 33	418.27	50%	2.11	2.03	1.95	Fabric Filter	99.5%	99.0%	99.0%
Gun Wash	394.59	50%	0.00	0.00	0.00	Fabric Filter	99.5%	99.0%	99.0%
Carbothane 8815 Part A	187.79	50%	182.26	174.97	168.60	Fabric Filter	99.5%	99.0%	99.0%
Carbocoat 45 Industrial Enamel	199.49	50%	185.24	177.83	171.35	Fabric Filter	99.5%	99.0%	99.0%
Purge Solvent	379.90	50%	0.00	0.00	0.00	Fabric Filter	99.5%	99.0%	99.0%
Sher-Will-Clean Wax and Grease Remover	365.66	50%	0.00	0.00	0.00	Fabric Filter	99.5%	99.0%	99.0%
Genesis Reducer	427.39	50%	0.00	0.00	0.00	Fabric Filter	99.5%	99.0%	99.0%
Genesis Standard Accelerator	414.57	50%	23.03	22.11	21.30	Fabric Filter	99.5%	99.0%	99.0%
Genesis Reducer Low VOC Solvent - Fast Fast	337.64	50%	18.76	18.01	17.35	Fabric Filter	99.5%	99.0%	99.0%
Urethane Converter 8800	189.95	50%	142.46	136.77	131.78	Fabric Filter	99.5%	99.0%	99.0%
MAX	587.17	50%	185.24	177.83	171.35				

Material Name	Controlled Emission (tpy)			Conditioned PTE w/250 tpy VOC Limit (tpy)		
	PM	PM10	PM2.5	PM	PM10	PM2.5
CTSGrayPrimerE2W34851/E2B1738	0.41	0.78	0.75	0.17	0.33	0.32
Sherwin-Williams /1738/ Black	0.18	0.34	0.33	0.12	0.23	0.22
Thinner 33	0.01	0.02	0.02	0.01	0.01	0.01
Gun Wash	0.00	0.00	0.00	0.00	0.00	0.00
Carbothane 8815 Part A	0.91	1.75	1.69	0.91	1.75	1.69
Carbocoat 45 Industrial Enamel	0.93	1.78	1.71	0.93	1.78	1.71
Purge Solvent	0.00	0.00	0.00	0.00	0.00	0.00
Sher-Will-Clean Wax and Grease Remover	0.00	0.00	0.00	0.00	0.00	0.00
Genesis Reducer	0.00	0.00	0.00	0.00	0.00	0.00
Genesis Standard Accelerator	0.12	0.22	0.21	0.07	0.13	0.13
Genesis Reducer Low VOC Solvent - Fast Fast	0.09	0.18	0.17	0.07	0.13	0.13
Urethane Converter 8800	0.71	1.37	1.32	0.71	1.37	1.32
MAX	0.93	1.78	1.71	0.93	1.78	1.71

Material	Toluene (108-88-3)	Ethylbenzene (100-41-4)	Xylene (1330-20-7)	Methanol (67-56-1)	HDI Isocyanate (822-06-0)
CTSGrayPrimerE2W34851/E2B1738	0.00	0.00	0.00	0.00	0.00
Sherwin-Williams /1738/ Black	4.46	33.03	218.74	0.00	0.00
Thinner 33	0.00	4.22	0.00	0.00	0.00
Gun Wash	39.46	3.95	19.73	35.51	0.00
Carbothane 8815 Part A	0.00	13.81	13.81	0.00	0.00
Carbocoat 45 Industrial Enamel	0.00	14.25	85.50	0.00	0.00
Purge Solvent	0.00	0.00	0.00	0.00	0.00
Sher-Will-Clean Wax and Grease Remover	84.10	0.00	0.00	0.00	0.00
Genesis Reducer	0.00	0.00	0.00	0.00	0.00
Genesis Standard Accelerator	0.00	0.00	0.00	0.00	0.00
Genesis Reducer Low VOC Solvent - Fast Fast	0.00	0.00	0.00	0.00	0.00
Urethane Converter 8800	0.00	0.00	23.74	0.00	0.95
MAX	84.10	33.03	218.74	35.51	0.95

Emissions Summary	Controlled Emissions (tpy)	Conditioned Emissions (tpy)
PM	0.93	0.93
PM ₁₀	1.78	1.78
PM _{2.5}	1.71	1.71
VOC	587.17	< 250
Toluene	84.10	35.81
Ethylbenzene	33.03	14.07
Xylene	218.74	93.13
Methanol	35.51	15.12
HDI Isocyanate	0.95	0.40
total HAPs	372.34	158.53