Lane Regional Air Protection Agency
Simple Air Contaminant Discharge Permit

REVIEW REPORT

Whittier Wood Products Co. **Permit No. 208894**
3787 West 1st Avenue
Eugene, Oregon, 97402
https://www.whittierwood.com/

Source Information:

Primary SIC	2511
Secondary SIC	--
Primary NAICS	337122
Secondary NAICS	--
Source Categories (LRAPA title 37, Table 1)	B.69: Surface coating operations: coating operations whose actual or expected usage of coating materials is greater than 250 gallons per month, excluding sources that exclusively use non-VOC and non-HAP containing coatings.
Public Notice Category	III

Compliance and Emissions Monitoring Requirements:

Unassigned Emissions	N	Source Test [date(s)]	N
Emission Credits	N	COMS	N
Special Conditions	N	CEMS	N
Compliance Schedule	N	Ambient monitoring	N

Reporting Requirements

Annual Report (due date)	February 15	Quarterly Report (due date)	N
Semi-annual Report (due date)	N	Monthly Report (due dates)	N
SACC (due date)	N	Excess Emissions Report	Y
GHG Report (due date)	N	Other Reports (due date)	N

Air Programs

NSPS (list subparts)	N	Title V	N
NESHAP (list subparts)	N	Major FHAP Source	N
40 CFR part 64: Compliance Assurance Monitoring (CAM)	N	Federal Major Source	N
		Type A State New Source Review	N
Regional Haze (RH)	N	Type B State New Source Review	N
TACT	N	Prevention of Significant Deterioration (PSD)	N
40 CFR part 68 Risk Management	N		
Cleaner Air Oregon (CAO)	N	Nonattainment New Source Review (NNSR)	N
Synthetic Minor (SM)	N		
SM-80	N		

Permit Identification

1. Whittier Wood Products Co. (facility' or 'Whittier') operates a wood furniture manufacturing facility located at 3787 West 1st Avenue in Eugene, Oregon. The facility began operating in 1975.

2. The facility operates under the primary Standard Industrial Classification (SIC) code of 2511 – Wood Household Furniture, Except Upholstered and primary North American Industry Classification System (NAICS) code is 337122 – Nonupholstered Wood Household Furniture Manufacturing.

General Background

3. The facility operates a wood furniture manufacturing facility located at 3787 West 1st Avenue in Eugene, Oregon. The facility operates four (4) paint booths with filters and a wood shop area where bookcases are manufactured and repair work is performed on damaged furniture components shipped from Whittier's main manufacturing operation in Vietnam. The sawdust created in the wood shop area is collected in portable collection bag systems throughout the main building. The sawdust is collected in 55-gallon drums and when full, dumped into a 30-yard container outside. The particulate matter emissions are assumed not to be emitted to the atmosphere and are not included in the permit as an emissions unit.

Reasons for Permit Action

4. This permit action is a renewal for an existing Simple Air Contaminant Discharge Permit (Simple ACDP) which expired on July 29, 2024. The current permit will remain in effect until final action has been taken on the renewal application. The renewed Simple ACDP will be valid for ten (10) years.

Attainment Status

5. The facility is located in an area that has been designated as attainment or unclassified for all criteria pollutants. The facility is located inside the Eugene-Springfield UGB as defined in LRAPA 29-0010 which designates the Eugene-Springfield CO and PM_{10} maintenance areas. The facility is located inside the Eugene-Springfield UGB as described in the current Eugene-Springfield Metropolitan Area General Plan, as amended. The facility is located within 100 kilometers of three (3) Class I air quality protection areas: Diamond Peak Wilderness, Mount Washington Wilderness and Three Sisters Wilderness area.

Permitting History

6. LRAPA has reviewed and issued the following permitting actions to this facility:

Date(s) Approved/Valid	Permit Action Type	Description
07/29/2019 – 07/29/2024	Simple ACDP	Renewal
Upon Issuance	Simple ACDP	Renewal

Emission Unit Descriptions

7. The emissions units regulated by this permit are the following:

Emission Unit ID	Description		Pollution Control Device (PCD ID)	Installed/Last Modified
EU-1	Paint Booths (4)	VOCs	NA	1976
		$PM/PM_{10}/PM_{2.5}$	Filter 98% control efficiency	1976

Nuisance, Deposition and Other Emission Limitations

8. Under LRAPA 49-010(1), the permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. Compliance is demonstrated through documentation of all complaints received by the facility from the general public and following procedures to notify LRAPA of receipt of these complaints.

9. Under LRAPA 32-055, the permittee must not cause or permit the emission of particulate matter which is larger than 250 microns in size at sufficient duration or quantity as to create an observable deposition upon the real property of another person. Compliance is demonstrated through documentation of all complaints received by the facility from the general public and following procedures to notify LRAPA of receipt of these complaints.

10. Under LRAPA 32-090(1), the permittee must not discharge from any source whatsoever such quantities of air contaminants which cause injury or damage to any persons, the public, business or property; such determination is to be made by LRAPA. Compliance is demonstrated through documentation of all complaints received by the facility from the general public and following procedures to notify LRAPA of receipt of these complaints.

General Emission Limitations

11. The facility is subject to the visible emission limitations under LRAPA 32-010(3). The permittee must not emit or allow to be emitted any visible emissions from all equipment, other than fugitive emission sources, that equal or exceed an average of 20 percent opacity. Compliance is demonstrated through a plant survey of visible emissions using EPA Method 22 to be completed at least once a quarter. The permittee is required to take corrective action if any visible emissions are identified and contact LRAPA or conduct an EPA Method 9 test if the visible emissions cannot be eliminated. In addition, the permittee must prepare and maintain an Operation & Maintenance Plan (O&M Plan) for all particulate matter emission control devices at the facility.

12. The non-fuel burning equipment at this source that emit particulate matter are subject to the following particulate matter emission limitations under LRAPA 32-015(2)(b)(B): For sources installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015 for which there are no representative compliance source test results, the particulate matter emission limit is 0.14 grains per dry standard cubic foot. Compliance is demonstrated through a plant survey of visible emissions using EPA Method 22 to be completed at least once a quarter. The permittee is required to take corrective action if any visible emissions are identified or conduct EPA Method 9 test if the visible emissions cannot be eliminated. In addition, the permittee must prepare and maintain an O&M Plan for all particulate matter emission control devices at the facility.

13. Each emission unit at the facility is subject to the process weight rate emission limitations under LRAPA 32-045(1) unless exempt under the rule. No person may cause, suffer, allow, or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight rate allocated to such process. Process weight is the total weight of all materials introduced into a piece of process equipment. Liquid and gaseous fuels and combustion air are not included in the total weight of all materials. Compliance is demonstrated through a plant survey of visible emissions using EPA Method 22 to be completed at least once a quarter. The permittee is required to take corrective action if any visible emissions are identified and contact LRAPA or conduct an EPA Method 9 test if the visible emissions cannot be eliminated. In addition, the permittee must prepare and maintain an O&M Plan for all particulate matter emission control devices at the facility

14. The facility must ensure that the paint booths filters can achieve at least 98% capture of paint overspray. All spray coatings must be applied by either HVLP or assisted airless spray guns. The manual spray gun cleaning must be performed so that an atomized mist or spray of gun cleaning

solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. The facility must ensure all personnel are trained in proper setup, spraying techniques and maintenance of spray equipment and all storage containers are kept closed except when adding or removing materials. The facility must demonstrate compliance by maintaining an Operation and Maintenance Plan (O&M Plan). At minimum, the O&M Plan must include inspection schedules for each spray booth and the associated dry filters used to control overspray from the spray coating operations according to permit Condition 10. The O&M Plan must identify procedures for recording the date and time of any inspections, identification of the equipment inspected, the results of the inspection, and the actions taken if repairs or maintenance are necessary

Typically Achievable Control Technology (TACT)

15. LRAPA 32-008(1) requires an existing unit at a facility prior to January 1, 1994, meet TACT if the emission unit meets the following criteria: The emission unit is not already subject to emission standards for the regulated pollutant under LRAPA title 30, title 32, title 33, title 38, title 39 or title 46 at the time TACT is required; the source is required to have a permit; the emission unit has emissions of criteria pollutants equal to or greater than five (5) tons per year of particulate or ten (10) tons per year of any gaseous pollutant; and LRAPA determines that air pollution control devices and emission reduction processes in use for the emissions do not represent TACT and that further emission control is necessary to address documented nuisance conditions, address an increase in emissions, ensure that the source is in compliance with other applicable requirements, or to protect public health or welfare, or the environment.

    15.a. The VOC emissions from any individual paint booth included under EU-1 have the potential to exceed ten (10) tons per year. While LRAPA has not performed a formal TACT determination for VOCs, LRAPA has determined that the following requirements likely meet TACT: (1) the use of high volume, low pressure (HVLP) (or equivalent), (2) prohibiting manual spray gun system cleaning from being performed outside a container that collects the gun cleaning solvent, and (3) requiring personnel who apply surface coatings to be trained in proper spray application of surface coatings. The facility's current use of HVLP spray guns results in the application of the least amount of VOC per square foot of product produced for their process. In addition, paint booths do not typically have add-on control technology due to the low concentration of VOCs and the high air flow rates resulting from these processes.

    15.b. The facility uses dry filters to control particulate matter emissions from EU-1 such that potential particulate matter emissions do not exceed five (5) tons per year from any individual paint booth. Thus, TACT is not applicable to particulate matter from EU-1.

New Source Performance Standards (NSPS)

16. There are no emission units at this facility for which NSPS have been promulgated or are applicable.

Hazardous Air Pollutants (HAPs) and National Emission Standards for Hazardous Air Pollutants (NESHAPs)

17. There are no emission units or activities at this facility for which NESHAPs have been promulgated or are applicable. LRAPA reviewed the following NESHAPs to determine their applicability to this facility:

    17.a. 40 CFR part 63 subpart JJ – National Emission Standard for Wood Furniture Manufacturing Operations is not applicable because the facility is not a major source of federal HAP.

    17.b. 40 CFR part 63 subpart QQQQ – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products is not applicable because the facility is not a major source of federal HAP.

Plant Site Emission Limits (PSELs)

18. Provided below is a summary of the baseline emission rate, netting basis and PSELs for this facility.

Pollutant	Baseline Emission Rate (TPY)	Netting Basis		Plant Site Emission Limit (PSEL)		Potential to Emit (TPY)	Significant Emission Rate (TPY)
		Previous (TPY)	Proposed (TPY)	Previous PSEL (TPY)	Proposed PSEL (TPY)		
PM	13	0	0	de minimis	de minimis	0	25
PM_{10}	13	0	0	de minimis	de minimis	0	15
$PM_{2.5}$	NA	0	0	de minimis	de minimis	0	10
CO	0	0	0	0	0	0	100
NO_X	0	0	0	0	0	0	40
SO_2	0	0	0	0	0	0	40
VOC	9.6	0	0	39	16	16	40
GHG (CO_2e)	NA	0	0	NA	NA	NA	75,000

18.a. The baseline emission rate was established in previous permit actions and was based on actual production totals from 1978. As the facility is operating under a Simple ACDP, these emission estimates are only listed for historical purposes. Because the facility is operating under a Simple ACDP, no baseline emission rate was established for GHGs or $PM_{2.5}$.

18.b. The netting basis is set at zero (0) for Simple ACDP in accordance with LRAPA 42-0046(4).

18.c. In accordance with LRAPA 42-0041(2), the PSELs for VOC are set equal to the source's potential to emit. No PSELs are set for PM, PM_{10}, $PM_{2.5}$, and GHGs in accordance with LRAPA 42-0020(3)(a) because these pollutants are emitted below the de minimis as defined in LRAPA title 12.

Unassigned Emissions and Emission Reduction Credits

19. The facility has zero (0) unassigned emissions. Unassigned emissions are equal to the netting basis minus the source's current PTE, minus any banked emission reduction credits. The facility has zero (0) tons of emission reduction credits.

New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

20. This source is located in an area that is designated attainment or unclassified for all regulated pollutants. For pollutants other than CO and PM_{10}, the proposed PSELs are less than the federal major source threshold for non-listed sources of 250 TPY per regulated pollutant and are not subject to Major NSR. For CO and PM_{10}, the source is located in a maintenance area. The proposed PSELs for CO and PM_{10} are less than the 100 TPY threshold that determines the applicability of Major NSR in a maintenance area.

Federal Hazardous Air Pollutants/Toxic Air Contaminants

21. Potential annual federal hazardous air pollutant emissions (FHAP) are based on the potential to emit (PTE) of the facility operating under permit limitations. Methanol has the highest single FHAP emissions at approximately 0.54 tons per year. The potential total FHAP emissions are 1.64 tons per year. A major source of FHAPs is defined as having potential FHAP emissions of at least 10 tons per year of any single FHAP and 25 tons per year of the aggregate of all FHAPs. This facility

does not have potential FHAP emissions exceeding these thresholds and is considered a minor or area source of FHAPs.

22. Under the Cleaner Air Oregon program, only existing sources that have been notified by LRAPA and new sources are required to perform risk assessments. This source has not been notified by LRAPA and, therefore, is not yet required to perform a risk assessment or report annual emissions of toxic air contaminants. LRAPA required reporting of approximately 600 toxic air contaminants in 2016 and regulates approximately 260 toxic air contaminants (TAC) that have Risk Based Concentrations established in rule. All FHAPs are on the list of approximately 600 TACs. The FHAPs and TACs listed below are based upon safety data sheets and standard emission factors for the types of emission units at this facility. After the source is notified by LRAPA, they must update their inventory and perform a risk assessment to see if they must reduce risk from their TACs. Until then, this source will be required to report TAC emissions triennially.

23. The table below represents the potential emissions of federal HAPs and CAO TACs from this facility assuming operation at the permit allowable limitations:

CAS/DEQ Number	Pollutant	PTE (TPY)	FHAP	CAO TAC
71-36-3	1-Butanol alcohol	2.75	No	Yes
108-65-6	2-methoxy-1-methylethyl acetate	2.28	No	Yes
67-63-0	2-Propanol	2.68	No	Yes
67-64-1	Acetone	30.98	No	Yes
89	Carbon Black	0.15	No	Yes
7631-86-9	Crystalline Silica, respirable powder	0.83	No	Yes
78-93-3	Methyl Ethyl Ketone	0.90	No	Yes
526-73-8	1,2,3-Trimethylbenzene	0.01	Yes	Yes
95-63-6	1,2,4-Trimethylbenzene	0.41	Yes	Yes
108-67-8	1,3,5-Trimethylbenzene	0.04	Yes	Yes
98-82-8	Cumene	0.01	Yes	Yes
100-41-4	Ethyl benzene	0.04	Yes	Yes
50-00-0	Formaldehyde	0.06	Yes	Yes
67-56-1	Methanol	0.54	Yes	Yes
108-88-3	Toluene	0.23	Yes	Yes
1330-20-7	Xylene	0.30	Yes	Yes
	Total HAPs and TACs (TPY)*		**1.64**	**42.20**

*These totals are reflective of the facility at capacity and are more conservative than the actual FHAP and TAC emissions of the facility under normal operation (1 shift per day/2080 hours per year).

Toxic Release Inventory

24. The Toxics Release Inventory (TRI) is a federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, chemicals covered by the TRI Program are those that cause:

- Cancer or other chronic human health effects;
- Significant adverse acute human health effects; or
- Significant adverse environmental effects.

There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical. NOTE: The TRI Program is a federal program over which LRAPA has no regulatory authority. LRAPA does not guarantee the accuracy of any information copied from EPA's TRI website.

25. In order to report emissions to the TRI program, a facility must operate under a reportable NAICS code, meet a minimum employee threshold, and manufacture, process, or otherwise use chemicals in excess of the applicable reporting threshold for the chemical. The facility's NAICS code 337122 – Nonupholstered Wood Household Furniture Manufacturing which is subject to the TRI program, but the facility falls below the reporting limits and does not have to report to the TRI program.

Compliance History

26. The facility has had no documented compliance issues at the facility since the last Simple ACDP renewal issuance dated July 29, 2019.

Source Testing History

27. The facility is not required to conduct source testing at this time. LRAPA is not aware of any historical source testing conducted at this facility.

Recordkeeping Requirements

28. To ensure compliance with the annual PSELs, the facility is required to keep a record of the following information for a period of five (5) years.

Activity	Parameter	Units	Recording Frequency
PSEL Recordkeeping			
VOC/HAP-containing Material Usage	Material Usage	Gallons or Pounds	Monthly
VOC/HAP-containing Material Usage	Density of Material	Pounds per Gallon	Maintain current information at all times
VOC-containing Material Usage	VOC Content	% By Weight	Maintain current information at all times
HAP-containing Material Usage	Individual HAP Content	% By Weight	Maintain current information at all times
Paint Booth Filter Particulate Matter Control Efficiency	Control Efficiency	%	Maintain documentation from each manufacturer
Spray Application Training	Training Logs / Certification	NA	Maintain documentation of program or training for spray coating personnel
Paint Booth Inspections	Occurrence	NA	Each Inspection
Paint Booth Filter Replacement	Occurrence	NA	Upon Replacement
General Recordkeeping			
Operation and Maintenance Plan	NA	NA	Maintain the current version on-site

Activity	Parameter	Units	Recording Frequency
Complaints from the public	Log each complaint and the resolution	NA	Upon receipt
Excess emissions log of all planned and unplanned excess emissions	See permit Condition G16	NA	Per occurrence

Reporting Requirements

29. The facility must submit to LRAPA the following reports by no later than the dates indicated in the table below.

Report	Reporting Period	Due Date
PSEL pollutant emissions as calculated according to permit Condition 5, including supporting calculations.	Annual	February 15
A summary of all complaints received by the permittee and their resolution as required by permit Condition G11.	Annual	February 15
The excess emissions log required by permit Condition G16, if any planned or unplanned excess emissions have occurred during the reporting period.	Annual	February 15

Public Notice

30. Pursuant to paragraph 37-0064(5)(a), issuance of a renewed Simple Air Contaminant Discharge Permit requires a Category III public notice according to title 31. In accordance with paragraph 31-0030(3)(c), LRAPA provided public notice of the proposed permit action and a minimum of 35 days for interested persons to submit written comments.

    The draft permit was on public notice from January 6, 2025 to February 11, 2025. No written comments were submitted during the public comment period. No public hearing was requested during the public comment period.

BE/AD/aa
2/20/2025

Plant Site Emission Limits					
Normal Operations					
Emission Unit	Projected Usage	$PM/PM_{10}/PM_{2.5}$	VOC	Single HAP	Total Aggregate HAPs
	lb/year	tpy	tpy	tpy	tpy
EU1: Paint Booths	49,182	0.49	15.91	0.13	0.42
1. Projected Usage is based on 1 shift per day or 2080 hours per year					

Plant Site Emission Limits					
Capacity					
Emission Unit	Capacity Usage	$PM/PM_{10}/PM_{2.5}$	VOC	Single HAP	Total Aggregate HAPs
	lb/year	tpy	tpy	tpy	tpy
EU1: Paint Booths	207,130	2.07	65.99	0.54	1.64
1. Capacity is based on 8760 hours per year					

Information		
Filter Efficiency	98	percent
Projected Maximum Usage	49182	lb/year
Pounds to tons	2000	lb/tons

Paint Booth PM Emissions			
Normal Operations			
Emission Unit	Projected Usage	Control Efficiency	$PM/PM_{10}/PM_{2.5}$ Emissions
	(lb/year)	(percent)	(tons/year)
EU-1	49182	98	0.49
1. All spray booths are routed to the primary filtration system with a control efficiency of 98%			
2. The projected usage is based on 2080 hours per year or one shift per day.			

Paint Booth PM Emissions			
Capacity			
Emission Unit	Capacity Usage	Control Efficiency	$PM/PM_{10}/PM_{2.5}$ Emissions
	(lb/year)	(percent)	(tons/year)
EU-1	204376	98	2.04
1. All spray booths are routed to the primary filtration system with a control efficiency of 98%			

Information for VOC Calculations		
Specific Gravity (of H_20)	8.343	lb/gals
Pounds per ton	2000	lb/ton

NORMAL OPERATIONS									
Product Name	**Product Code**	**2022 Annual Actual Usage (gallons)**	**Projected Annual Usage [1] (gallons)**	**Relative Density**	**Weight (lb/gal)**	**Projected Maximum Usage (lbs)**	**VOC %**	**Total VOC (lbs/yr)**	**Total VOC (tpy)**
T77 Sherwood 9420S LV HAPs Free Precat topcoat	T77CXT22691-794383	0	248	0.94	7.84	1942	0.384	746	0.37
SHER-WOOD® 9420S LV Precatalyzed Topcoat 10 Gloss	T77F90022	0	248	0.94	7.84	1942	0.384	746	0.37
Sherwood 9420S LV Precatalyzed Topcoat	T77F90023	1939	1939	0.94	7.84	15206	0.384	5839	2.92
SHER-WOOD® Color Express Precat SW 9180 AGED WHITE	T77PNW18042-794383	0	248	1.05	8.76	2169	0.761	1651	0.83
Sherwin-Williams Industrial Coatings CAFE NGR	S64XXN17778-4383	770	770	0.79	6.59	5075	0.903	4583	2.29
SHER-WOOD® SB Stain CHERRY	S64SBN17776-4383	75	150	1.04	8.68	1302	0.737	959	0.48
Sherwin-Williams Industrial Coatings CHERRY NGR	S64XXN17777-4383	535	535	0.81	6.76	3615	1.000	3615	1.81
Sherwin-Williams Industrial Coatings CHERRY TONER	S67SBN17934-4383	265	265	0.81	6.76	1791	1.000	1791	0.90
Sherwin-Williams Industrial Coatings FIELD STONE NGR	S67SBW21167-4383	0	248	0.84	7.01	1735	0.930	1614	0.81
Sherwin-Williams Industrial Coatings FIELD STONE NGR	S67SBW18392-4383	275	275	0.83	6.92	1904	0.970	1847	0.92
SHER-WOOD® SB Stain hampton walnut	S64SBN16874-4383	0	248	0.91	7.59	1880	0.849	1596	0.80
Sherwin-Williams Industrial Coatings JAVA WIPING STAIN	S64SBN23229-794383	0	248	0.9	7.51	1862	1.000	1862	0.93
Sherwin-Williams Industrial Coatings NATURAL	S67SBN18200-4383	325	325	0.82	6.84	2223	0.930	2068	1.03
SHER-WOOD® Color Express Precat SW 6258 TRICORN	T77PNB12952-794383	0	248	0.97	8.09	2004	0.393	787	0.39
Sherwin-Williams Industrial Coatings sw 7649 silverplate 20	T77HXA18129-4383	0	248	1.05	8.76	2169	0.361	783	0.39
SHER-WOOD® White Hi-Bild™ Precat Lacquer sw 7004	T77HXW18128-4383	0	248	1.06	8.84	2190	0.537	1176	0.59
SHER-WOOD SB Stain TEA WITH MILK	S64SBN050-4383	25	25	0.83	6.92	173	0.909	157	0.08
TOTALS		**4209**	**6513**			**49182**		**31819**	**15.91**
Average Amount Used from 2022		**248**							

1) 248 gallons is the average 2022 gallon usage. This amount was used for the projected maximum usage. The projected usage is based on one (1) shift per day.

Information for Capacity Calculations		
8 hours per shift/5 days/52 weeks	2080	hrs/year
Hours per year	8760	hrs/year

CAPACITY									
Product Name	**Product Code**	**2022 Annual Actual Usage (gals)**	**Projected Maximum Annual Usage (gals)[1]**	**Relative Density**	**Weight (lb/gal)**	**Projected Maximum Usage (lbs)**	**VOC %**	**Total VOC (lbs/yr)**	**Total VOC (tpy)**
T77 Sherwood 9420S LV HAPs Free Precat topcoat	T77CXT22691-794383	0	1043	0.94	7.84	8178	0.384	3140	1.57
SHER-WOOD® 9420S LV Precatalyzed Topcoat 10 Gloss	T77F90022	0	1043	0.94	7.84	8178	0.384	3140	1.57
Sherwood 9420S LV Precatalyzed Topcoat	T77F90023	1939	8166	0.94	7.84	64043	0.384	24592	12.30
SHER-WOOD® Color Express Precat SW 9180 AGED WHITE	T77PNW18042-794383	0	1043	1.05	8.76	9134	0.761	6951	3.48
Sherwin-Williams Industrial Coatings CAFE NGR	S64XXN17778-4383	770	3243	0.79	6.59	21374	0.903	19301	9.65
SHER-WOOD® SB Stain	S64SBN17776-4383	75	316	1.04	8.68	2741	0.737	2020	1.01
Sherwin-Williams Industrial Coatings CHERRY NGR	S64XXN17777-4383	535	2253	0.81	6.76	15227	1.000	15227	7.61
Sherwin-Williams Industrial Coatings CHERRY TONER	S67SBN17934-4383	265	1116	0.81	6.76	7542	1.000	7542	3.77
Sherwin-Williams Industrial Coatings FIELD STONE NGR	S67SBW21167-4383	0	1043	0.84	7.01	7308	0.930	6796	3.40
Sherwin-Williams Industrial Coatings FIELD STONE NGR	S67SBW18392-4383	275	1158	0.83	6.92	8020	0.970	7779	3.89
SHER-WOOD® SB Stain hampton walnut	S64SBN16874-4383	0	1043	0.91	7.59	7917	0.849	6721	3.36
Sherwin-Williams Industrial Coatings JAVA WIPING STAIN	S64SBN23229-794383	0	1043	0.9	7.51	7830	1.000	7830	3.91
Sherwin-Williams Industrial Coatings NATURAL	S67SBN18200-4383	325	1369	0.82	6.84	9364	0.930	8708	4.35
SHER-WOOD® Color Express Precat SW 6258 TRICORN	T77PNB12952-794383	0	1043	0.97	8.09	8438	0.393	3316	1.66
Sherwin-Williams Industrial Coatings sw 7649 silverplate 20	T77HXA18129-4383	0	1043	1.05	8.76	9134	0.361	3298	1.65
SHER-WOOD® White Hi-Bild™ Precat Lacquer sw 7004	T77HXW18128-4383	0	1043	1.06	8.84	9221	0.537	4952	2.48
SHER-WOOD SB Stain TEA WITH MILK	S64SBN050-4383	25	105	0.83	6.92	729	0.909	663	0.33
TOTALS		**4209**	**27111**			**204376**		**131976**	**65.99**
Average Amount Used from 2022		**248**							
1) Assumes that the facility operates 8,760 hours per year									

NORMAL ANNUAL FHAP and CAO TAC TOTALS

CAS #	Chemical Name	Alterante Chemical Name	FHAP	CAO TAC	Total FHAP	Total TAC
			Y/N	Y/N	tpy	tpy
71-36-3	1-Butanol alcohol	n-butyl alcohol	N	Y		6.53E-01
108-65-6	2-methoxy-1-methylethyl acetate	Propylene glycol monmethyl ether acetate	N	Y		5.41E-01
67-63-0	2-Propanol	Isopropyl alcohol	N	Y		6.36E-01
67-64-1	Acetone		N	Y		7.35E+00
89	Carbon Black		N	Y		3.64E-02
7631-86-9	Crystalline Silica, respirable powder	Silica, crystalline (respirable)	N	Y		1.98E-01
78-93-3	Methyl Ethyl Ketone	2-Butanone	N	Y		2.13E-01
526-73-8	1,2,3-Trimethylbenzene		Y	Y	6.77E-03	6.77E-03
95-63-6	1,2,4-Trimethylbenzene		Y	Y	1.07E-01	1.07E-01
108-67-8	1,3,5-Trimethylbenzene		Y	Y	2.04E-02	2.04E-02
98-82-8	Cumene	Isopropylbenzene	Y	Y	3.05E-03	3.05E-03
100-41-4	Ethyl benzene		Y	Y	1.24E-02	1.24E-02
50-00-0	Formaldehyde		Y	Y	1.38E-02	1.38E-02
67-56-1	Methanol		Y	Y	1.28E-01	1.28E-01
108-88-3	Toluene		Y	Y	5.43E-02	5.43E-02
1330-20-7	Xylene	Xylene (mixture), including m-xylene, o-xylene, p-xylene	Y	Y	7.55E-02	7.55E-02
1. The calculations basis was derived from the SDS sheets of the products used at the facility for one shift a day.			**TOTALS**		**0.42**	**10.05**
			Highest Single FHAP		**0.13**	

CAPACITY FHAP and CAO TAC TOTALS

CAS #	Chemical Name	Alterante Chemical Name	FHAP	CAO TAC	Total FHAP	Total TAC
			Y/N	Y/N	tpy	tpy
71-36-3	1-Butanol alcohol	n-butyl alcohol	N	Y		2.75E+00
108-65-6	2-methoxy-1-methylethyl acetate	Propylene glycol monmethyl ether acetate	N	Y		2.28E+00
67-63-0	2-Propanol	Isopropyl alcohol	N	Y		2.68E+00
67-64-1	Acetone		N	Y		3.10E+01
89	Carbon Black		N	Y		1.49E-01
7631-86-9	Crystalline Silica, respirable powder	Silica, crystalline (respirable)	N	Y		8.28E-01
78-93-3	Methyl Ethyl Ketone	2-Butanone	N	Y		8.98E-01
526-73-8	1,2,3-Trimethylbenzene		Y	Y	1.48E-02	1.48E-02
95-63-6	1,2,4-Trimethylbenzene		Y	Y	4.10E-01	4.10E-01
108-67-8	1,3,5-Trimethylbenzene		Y	Y	4.48E-02	4.48E-02
98-82-8	Cumene	Isopropylbenzene	Y	Y	1.28E-02	1.28E-02
100-41-4	Ethyl benzene		Y	Y	3.84E-02	3.84E-02
50-00-0	Formaldehyde		Y	Y	5.82E-02	5.82E-02
67-56-1	Methanol		Y	Y	5.39E-01	5.39E-01
108-88-3	Toluene		Y	Y	2.28E-01	2.28E-01
1330-20-7	Xylene	Xylene (mixture), including m-xylene, o-xylene, p-xylene	Y	Y	2.97E-01	2.97E-01
1. Assumes the facility is operating 8,760 hours per year			**TOTALS**		**1.64E+00**	**42.20**
			Highest Single FHAP		**5.39E-01**	