BEFORE THE ENVIRONMENTAL QUALITY COMMISSION

OF THE STATE OF OREGON

IN THE MATTER OF ENTEK INTERNATIONAL LLC, a Delaware limited liability company, Respondent.	)))))	MUTUAL AGREEMENT AND FINAL ORDER DEQ Case No. AQ/CAO-WR-2021-015 OAH Case No. 2021-ABC-04767

WHEREAS:

1. On February 3, 2021, the Department of Environmental Quality (DEQ) issued Notice of Civil Penalty Assessment and Order No. AQ/CAO-WR-2021-015 (Notice) to Respondent. DEQ assessed a $7,200 civil penalty against Respondent for violations alleged in the Notice.

2. On February 22, 2021, Respondent filed a timely request for hearing.

3. On July 26, 2021, DEQ referred the contested case to the Office of Administrative Hearings.

I. AGREEMENT

Respondent and DEQ hereby agree that:

1. This Mutual Agreement and Final Order (MAO) shall be effective upon the date fully executed.

2. As in the Notice, the Facility is the microporous plastic manufacturing facility owned and operated by Respondent and located at 250 Hansard Avenue in Lebanon, Linn County, Oregon. Respondent operates the Facility pursuant to Title V Operating Permit No. 22-6024-TV-01 (the Title V permit).

3. DEQ hereby approves the toxic air contaminants emissions inventory for the Facility attached in Exhibit 1 and incorporated as part of this MAO (the Stipulated EI). The Stipulated EI includes trichloroethylene (TCE) emissions from battery separator off-gassing at the Facility warehouse.

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4. Respondent and DEQ agree that the Stipulated EI represents Respondent's EI for the Facility, agreed to and approved by DEQ as of the effective date of this MAO. The Stipulated EI may be amended in the future based on new information and according to the requirements and procedures in OAR Chapter 340, Division 245.

5. Exhibit 2 of the Notice is amended by reducing the C factor from 2 to -2. This results in a change in the civil penalty for the violation described in Section III, Paragraph 4 of the Notice from to $7,200 to $6,000. The amended findings and determination of the civil penalty is attached and incorporated as Exhibit 2 to this MAO.

6. The total civil penalty is reduced from **$7,200** to **$6,000**.

7. Pursuant to OAR 340-012-0030(19) and OAR 340-012-0145(2), the violation alleged in the Notice and as amended by this MAO, will be treated as a prior significant action in the event a future violation occurs.

8. By entering into this MAO, Respondent neither admits nor denies the allegations related to or arising from any of the matters addressed in this MAO.

9. Respondent waives any and all rights and objections Respondent may have to the form, content, manner of service and timeliness of the Notice; to a contested case hearing and judicial review of the Notice; and to service of a copy of this MAO.

10. This MAO resolves all civil claims of DEQ, based upon the facts alleged, for the violations expressly alleged in the Notice as amended by the MAO. This MAO is not intended to limit, in any way, DEQ's right to proceed against Respondent in any forum for any past or future violations not expressly settled herein.

11. Respondent releases and waives any and all claims of any kind, known or unknown, past or future, against the State of Oregon or its agencies, instrumentalities, employees, officers, or agents, arising out of the matters and events set out in the Notice and this MAO. Any and all claims includes but is not limited to any claim under 42 USC § 1983 et seq., any claim under federal or state law for damages, declaratory, or equitable relief, and any claim for attorney's fees or costs.

12. This MAO shall be binding on Respondent and its respective successors, agents, and assigns. The undersigned representative of Respondent certifies that they are fully authorized to execute and bind Respondent to this MAO. No change in ownership, corporate or partnership status of Respondent, or change in the ownership of the properties or businesses affected by this MAO shall in any way alter Respondent's obligation under this MAO, unless otherwise approved in writing by DEQ through an amendment to this MAO.

13. DEQ agrees to expeditiously process Title V permit modification application 33062, to incorporate the TCE continuous emissions monitors as the monitoring methodology for the Main Stack and Warehouse Stack.

14. Verifiable electronic, facsimile, or scanned signatures on this MAO shall be treated the same as original signatures.

15. The civil penalty payment pursuant to Section II, Paragraph 2 of this MAO must be made by check or money order made payable to the "State Treasurer, State of Oregon" and sent to DEQ Business Office, 700 NE Multnomah Street, Suite 600, Portland, OR 97232.

16. The document modification fee pursuant to Section II, Paragraph 3 of this MAO must be made by check or money order made payable to "DEQ" and sent to DEQ Business Office, 700 NE Multnomah Street, Suite 600, Portland, OR 97232.

II. FINAL ORDER

The Environmental Quality Commission hereby enters a final order:

1. Approving Respondent's toxic air contaminants emissions inventory for the Facility (the Stipulated EI). A copy of the Stipulated EI is attached as Exhibit 1 and incorporated as part of this MAO. For purposes of complying with OAR 340-245-0030(1)(b) and (1)(c), the DEQ approval date of the Stipulated EI is the effective date of this MAO.

2. Imposing upon Respondent a total civil penalty of $6,000 for the violations alleged in the Notice and as amended by this MAO, all of which is due by February 14, 2022.

3. Requiring Respondent to pay a submittal document modification fee of $2,500 in accordance with OAR 340-216-8030, Table 3 by February 14, 2022.

ENTEK INTERNATIONAL LLC (RESPONDENT)

1-14-22
Date

Signature

Geoffrey Schiveley
Name (print)

VP & General Counsel
Title (print)

DEPARTMENT OF ENVIRONMENTAL QUALITY and
ENVIRONMENTAL QUALITY COMMISSION

1/18/2022
Date

Kieran O'Donnell, Manager
Office of Compliance and Enforcement
on behalf of DEQ pursuant to OAR 340-012-0170
on behalf of the EQC pursuant to OAR 340-011-0505

EXHIBIT 1

State of Oregon Department of Environmental Quality

Cleaner Air Oregon

Air Toxics Reporting Form AQ520

Reporting Form Instructions

AQ520 Form - Version 1.6
5/10/2021

Please save this file to your own computer before filling out this reporting form.

Before completing this form please review the DEQ website for the most recent versions and instructions for this form:

https://www.oregon.gov/deq/aq/aqPermits/Pages/CAO-rec

All DEQ and Lane Regional Air Protection Agency permitted facilities, or facilities applying for Air Quality permits, will need to complete and submit this form as the first step in the Cleaner Air Oregon Air Toxics Program.

Please fill out the following worksheets to complete an air toxic emissions inventory for your facility:

Worksheet 1	Facility Information	Record facility name and address, contact person, source number, and number of employees in the boxes.
Worksheet 2	Emission Units & Activities	Record all Toxics Emissions Units and activities that emit air toxics included in the list of associated Air Toxic contaminants. Provide both annual and maximum daily production and process rates, emission type, and control devices/efficiency for each emissions unit.
Worksheet 3	Pollutant Emissions - EF	Record all Air Toxic pollutants CAS/DEQ ID and chemical names, pollutant-specifc emissions factors and control efficiencies, and calculated emissions.
Worksheet 4	Material Balance Activities	Record all emission units and activities that emit air toxics included in the list of associated air toxic contaminants. Provide annual and maximum daily material usage and waste activities, material names and manufacturer, and emission type.
Worksheet 5	Pollutant Emissions - MB	Record all Air Toxic pollutants CAS/DEQ ID and chemical names associated with recorded materials, pollutant-specifc percent composition and control efficiencies, and calculated emissions.

Note: Emissions information will be entered on **Worksheets 2&3** for **EF-based emissions**, and **Worksheets 4&5** for **Material Balance-based emissions.**

What you need (Existing Sources):
1. Current Permit and Permit Review Report
2. Emission Detail Sheets
3. Safety Data Sheets, Certified Product Data Sheets, Environmental Data Sheets, or any lab data for each material used.
4. Most Recent Annual Report[s]
5. Any other documentation needed to help fulfill request - e.g. emissions factor references, source test review reports, etc.

Worksheet 1: Facility Information

Please provide the facility name and address, contact person, and source number which is the first 6 digits of the permit number (existing sources) in the boxes provided.

Worksheet 2: Emission Units & Activities

1. List all Toxics Emissions Units (TEUs), Activity IDs and descriptions, and Control Devices for all emission units or activities that emit air toxics at the facility. Use emission unit or activity ID from permits and create new IDs as necessary. For **Material Balance** activities proceed to **Worksheet 4.**

2. Record emissions type (i.e. Stack or Fugitive) and corresponding emission type ID.

3. Describe activity units (e.g. MM ft^3, gallons, tons, MMBTU, pounds, etc.) and type (e.g. natural gas, wood, metal poured, etc.) for each specific emissions unit/activty.

4. Record quantities, units of measurements, and types of **Annual** and **Maximum Daily** activity/production/process rates for each TEU/Activity for **"Actual"**, **"Requested PTE"**, and "**Capacity**" production scenarios.

> **Note:** "**Actual**" is based on the reporting year (existing sources) or an estimate of typical production (new sources); **Requested** PTE" is the level requested by the source, which may be higher than "**Actual**" production values; and "**Capacity**" is based on the 100% uptime and production for the facility - this may be used for *de Minimus* screening.

Worksheet 3: Pollutant Emissions - EF

1. Provide a row for each Air Toxic emitted from a specified TEU. Either select a CAS number or DEQ ID from the dropdown list or cut and paste both the CAS/DEQ ID and Chemical Name for each pollutant.

2. Provide the Total Combined Control Efficiency for each pollutant from the specificied TEU - this value may be composed of multiple capture/transfer efficiencies and destruction/removal efficiencies. **Note:** These control efficiencies may differ for different pollutants from the same TEU.

3. Provide pollutant-specifc Emissions Factors (EF) for both Annual and Maximum Daily emissions (if different). Also provide the units for the EF values in **pounds/activity units**. Provide EF references (AP-42, WebFire, Source Tests, etc.) and any related notes (e.g. Control Efficiency references).

4. Calculate emissions using the following formula (**Note:** see the example calculations in **red**):

E = (P)*(EF)*(1-CE)

E	=	Annual or Maximum Daily air toxics emissions **[Pounds/(Year|Day)]**
P	=	Production or Process Usage Rate **[Activity Units/(Year|Day)]**
EF	=	Pollutant Emission Factor **[Pounds/ Activity Unit]**
CE	=	Overall Control Efficiency **expressed as a decimal.**

Worksheet 4: Material Balance Activities

1. List all TEU IDs and TEU/Activity descriptions with emissions from material balance activities. For Emission Factor-based activities proceed to **Worksheet 2.**

2. List all materials (e.g. paints, coating materials, thinners, solvents, etc.) containing pollutants from the provided Air Toxics list - include product name and manufacturer for each specified TEU/Activity.

3. Record emissions type (i.e. Stack or Fugitive) and corresponding emission type ID.

4. Record "Material Usage" quantities **in pounds** for both annual and maximum daily activity/production/process rates for each TEU/activity for "Actual", "Requested PTE", and "Capacity" production scenarios.

> **Note:** "**Actual**" is based on the reporting year (existing sources) or an estimate of typical production (new sources); "**Requested PTE**" is the level requested by the source, which may be higher than "**Actual**" production values; and "**Capacity**" is based on the 100% uptime and production for the facility - this may be used for *de Minimus* screening.

5. Record "Material Wasted" quantities in pounds for both annual and maximum daily activity/production/process rates for each TEU/activity for "Actual", "Requested PTE", and "Capacity" production scenarios.

> **Note:** "Material Wasted" may consist of waste collected and shipped off-site, materials that drain as liquid to a collection/treatment system, material that may be retained in the product, or any material that should beexcluded from emissions calculations.

Worksheet 5: Pollutant Emissions - MB

1. Provide a row for each Air Toxic emitted from a specified material and its associated TEU/Activity. Either select a CAS number or DEQ ID from the dropdown list or cut and paste both the CAS/DEQ ID and Chemical Name for each pollutant.

2. Provide the Total Combined Control Efficiency for each pollutant contained in a specified material - this value may be composed of multiple capture/transfer efficiencies and destruction/removal efficiencies. **Note:** These control efficiencies may differ for different pollutants from the same material and TEU/Activity.

3. Provide the percent composition for the Air Toxic in the specified material as provided by the manufacturer supplied data (e.g. SDS).

> **Note:**
> If percent weight is a range, use the mid-point of the range. (e.g., if range is 10-50% use 30%, or if the SDS lists < 5% use 2.5%)

4. Provide any notes or references relevant to the pollutant emissions - e.g. technical references, details of control efficiencies, etc.

5. Calculate emissions using the following formula (**Note:** see the example calculations in **red**):

$$E = [(C_X - W_X) * K_X] * (1 - CE)$$

E	=	Annual or Maximum Daily air toxic emissions **[Pounds/(Year|Day)]**
X	=	Subscript X represents a specific material
C	=	Material usage **[Pounds/(Year|Day)]**
W	=	Material waste **[Pounds/(Year|Day)]**
K	=	Percent weight air toxic pollutant concentration expressed as a decimal
CE	=	Control efficiency expressed as decimal

AQ520 Form - Version 1.6
5/10/2021

Facility Information	
Facility Name	ENTEK International LLC
Facility Address	250 Hansard Avenue
City	Lebanon
Zip Code	97355
Source Number (for existing sources)	22-6024
Facility Contact	Agustin Figueroa
Phone Number	541-259-8513

INSTRUCTIONS:
- **Toxic Emissions Unit and Stack/Fugitive ID**: use IDs consistent with permit identifiers if applicable.
- **Activity Units/Type:** where possible, maintain consistency with permitted/reported Units/Type.
- **Max Daily Activity:** for semi-continuous/batch processes this value should account for co-occurring activities, process and/or maintenance, that would account for the potential maximum emissions activities for this pollutant.
  - **Actual:** values should be based on the last full year reported to DEQ or estimates of normal activity (new sources).
  - **Capacity:** maximum activity value achievable with 100% operational up-time for this unit.
  - **Requested PTE:** values that a source is requesting to be permitted on that differ from "Actuals" and "Capacity".

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Emissions Unit Information			Stack/Fugitive Information	
Toxics Emissions Unit ID	Unit Description	Control Device[s]	Emission Type (e.g. Point or Fugitive)	Stack or Fugitive ID
TEU-1A	Microporous Plastic Production Operation (Permanent Total Enclosure)	CB-1 (Main Carbon Bed)	Point	EU-1 Stack
TEU-1B1	Microporous Plastic Production Operation (Components in TCE Service)	N/A	Point (Multiple)	TBD
TEU-1B2	Microporous Plastic Production Operation (Components in TCE Service)	N/A	Fugitive	TBD
TEU-1C	Warehouse (TCE Offgassing Emissions)	N/A	Point	TBD
TEU-4	ENTEK Manufacturing Welding for Metal Fabrication Activities	N/A	Point (Multiple)	TBD
TEU-2.1_NG	Boiler 1 - Natural Gas (65 mmbtu/hr)	N/A	Point	TBD
TEU-2.1_OIL	Boiler 1 - Oil	N/A	Point	TBD
TEU-2.3_NG	Boiler 3 - Natural Gas (97 mmbtu/hr)	N/A	Point	TBD
TEU-2.3_OIL	Boiler 3 - Oil	N/A	Point	TBD

Activity Information

Units (e.g. hours operation, tons material, gallons)	Description/Type	Annual - Chronic [units/year]			Max Daily - Acute [units/day]		
		Actual	Requested PTE	Capacity	Actual	Requested PTE	Capacity
hours	CEMS Data		8760			24	
hours	LDAR Program		8760			24	
hours	LDAR Program		8760			24	
hours	CEMS Data		8760			24	
M lbs	Electrode Usage	1.31	3.19		3.58E-03	8.74E-03	
MMSCF	Natural Gas	0.00	463.00		0.00	1.44	
Mgal	No. 2 Fuel Oil	0.00	130.00		0.00	12.10	
MMSCF	Natural Gas	493.50	741.00		1.35	2.15	
Mgal	No. 2 Fuel Oil	5.80	208.00		0.02	16.68	

INSTRUCTIONS:
- **CAS or DEQ ID:** either use the drop-down provided or simply cut and paste each pollutant CAS number or DEQ ID (see DEQ Pollutant List Worksheet) emitted by the referenced TEU.
- **Chemical Name:** if a CAS number or DEQ ID is entered in *Column B*, *Column C* should perform a lookup from the DEQ Air Toxics list; alternatively, simply cut and paste the chemical names that correspond to the CAS numbers/DEQ ID in *Column B* if applicable.
- **Control Efficiency:** enter the pollutant specific control efficiency - this should include all capture and removal process efficiencies applicable to each individual pollutant.
- **EF Values:** provide emission factors for Annual and Max Daily conditions; if Annual and Max Daily EF values are equivalent, please enter value in Annual (*Column F*).
- **Emission Factor Information Reference/Notes:** provide EF references (e.g. Source Tests, AP-42, Engineering Estimates, etc) as well as any additional notes (e.g. control efficiencies).
- **Calculated Emissions:** follow guidance in "*Form Instructions*" worksheet for specific formulas.

Toxic Emissions Unit ID	Pollutant Information		Control Efficiency	EF Values		Units
	CAS or DEQ ID	Chemical Name		Annual - Chronic	Max Daily - Acute	
TEU-1A	79-01-6	Trichloroethene (TCE, trichloroethylene)	0.00%	10.0	10.0	lb/hr
TEU-1A	106-88-7	1,2-Epoxybutane	0.00%	0.0503	0.0503	lb/hr
TEU-1B1	79-01-6	Trichloroethene (TCE, trichloroethylene)	0.00%	0.0493	0.0493	lb/hr
TEU-1B1	106-88-7	1,2-Epoxybutane	0.00%	2.48E-04	0.0002	lb/hr
TEU-1B2	79-01-6	Trichloroethene (TCE, trichloroethylene)	0.00%	2.88E-02	2.88E-02	lb/hr
TEU-1B2	106-88-7	1,2-Epoxybutane	0.00%	1.45E-04	1.45E-04	lb/hr
TEU-1C	79-01-6	Trichloroethene (TCE, trichloroethylene)	0.00%	1.0674	1.0674	lb/hr
TEU-1C	106-88-7	1,2-Epoxybutane	0.00%	0.0054	0.0054	lb/hr
TEU-4	18540-29-9	Chromium VI, chromate and dichromate particulate	0.00%	1.89E-02	1.89E-02	lb/M lb electrode
TEU-4	7440-48-4	Cobalt and compounds	0.00%	8.47E-04	8.47E-04	lb/M lb electrode
TEU-4	7439-96-5	Manganese and compounds	0.00%	6.17E-01	6.17E-01	lb/M lb electrode
TEU-4	7440-02-0	Nickel and compounds	0.00%	1.93E-02	1.93E-02	lb/M lb electrode
TEU-2.1_NG	71-43-2	Benzene	0.00%	0.0058	0.0058	lb/mmcf
TEU-2.1_NG	50-00-0	Formaldehyde	0.00%	0.0123	0.0123	lb/mmcf
TEU-2.1_NG	401	Polycyclic aromatic hydrocarbons (PAHs)	0.00%	0.0001	0.0001	lb/mmcf
TEU-2.1_NG	50-32-8	Benzo[a]pyrene	0.00%	0.0000012	0.0000012	lb/mmcf
TEU-2.1_NG	91-20-3	Naphthalene	0.00%	0.0003	0.0003	lb/mmcf
TEU-2.1_NG	75-07-0	Acetaldehyde	0.00%	0.0031	0.0031	lb/mmcf
TEU-2.1_NG	107-02-8	Acrolein	0.00%	0.0027	0.0027	lb/mmcf
TEU-2.1_NG	7664-41-7	Ammonia	0.00%	3.2	3.2	lb/mmcf
TEU-2.1_NG	7440-38-2	Arsenic and compounds	0.00%	0.0002	0.0002	lb/mmcf
TEU-2.1_NG	7440-39-3	Barium and compounds	0.00%	0.0044	0.0044	lb/mmcf
TEU-2.1_NG	7440-41-7	Beryllium and compounds	0.00%	0.000012	0.000012	lb/mmcf
TEU-2.1_NG	7440-43-9	Cadmium and compounds	0.00%	0.0011	0.0011	lb/mmcf
TEU-2.1_NG	18540-29-9	Chromium VI, chromate and dichromate particulate	0.00%	0.0014	0.0014	lb/mmcf
TEU-2.1_NG	7440-48-4	Cobalt and compounds	0.00%	0.000084	0.000084	lb/mmcf
TEU-2.1_NG	7440-50-8	Copper and compounds	0.00%	0.00085	0.00085	lb/mmcf
TEU-2.1_NG	100-41-4	Ethyl benzene	0.00%	0.0069	0.0069	lb/mmcf

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Emission Factor Information	Calculated Emissions					
	Annual - Chronic [lb/yr]			Max Daily - Acute [lb/day]		
Reference/Notes	Actual	Requested PTE	Capacity	Actual	Requested PTE	Capacity
Control efficiency included in CEMS data.		87600.00			240	
Assume ratio of percent compositions are conserved in emissions		440.20			1.21	
		431.98			1.18	
Assume ratio of percent compositions are conserved in emissions		2.17			0.00595	
		252.60			0.692	
Assume ratio of percent compositions are conserved in emissions		1.27			0.00348	
		9350.00			25.62	
Assume ratio of percent compositions are conserved in emissions		46.98			0.129	
Includes GMAW welding process (electrode types E70S & ER316) and FCAW Welding Process (electrode types E316LT & E71T)	0.025	0.060		6.77E-05	1.65E-04	
Includes SMAW welding process (Electrode Type E7018), GMAW welding process (electrode types E70S & ER316) and FCAW Welding Process (electrode types E316LT & E71T)	0.001	0.003		3.03E-06	7.40E-06	
Includes SMAW welding process (Electrode Type E7018), GMAW welding process (electrode types E70S & ER316) and FCAW Welding Process (electrode types E316LT & E71T)	0.807	1.968		2.21E-03	5.39E-03	
Includes SMAW welding process (Electrode Type E7018), GMAW welding process (electrode types E70S & ER316) and FCAW Welding Process (electrode types E316LT & E71T)	0.025	0.062		6.91E-05	1.69E-04	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	2.69E+00		0.0	7.36E-03	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	5.69E+00		0.0	1.56E-02	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	4.63E-02		0.0	1.27E-04	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	5.56E-04		0.0	1.52E-06	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.39E-01		0.0	3.81E-04	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.44E+00		0.0	3.93E-03	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.25E+00		0.0	3.42E-03	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.48E+03		0.0	4.06E+00	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	9.26E-02		0.0	2.54E-04	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	2.04E+00		0.0	5.58E-03	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	5.56E-03		0.0	1.52E-05	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	5.09E-01		0.0	1.40E-03	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	6.48E-01		0.0	1.78E-03	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	3.89E-02		0.0	1.07E-04	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	3.94E-01		0.0	1.08E-03	
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	3.19E+00		0.0	8.75E-03	

TEU-2.1_NG	110-54-3	Hexane	0.00%	0.0046	0.0046	lb/mmcf
TEU-2.1_NG	7439-92-1	Lead and compounds	0.00%	0.0005	0.0005	lb/mmcf
TEU-2.1_NG	7439-96-5	Manganese and compounds	0.00%	0.00038	0.00038	lb/mmcf
TEU-2.1_NG	7439-97-6	Mercury and compounds	0.00%	0.00026	0.00026	lb/mmcf
TEU-2.1_NG	1313-27-5	Molybdenum trioxide	0.00%	0.0011	0.0011	lb/mmcf
TEU-2.1_NG	7440-02-0	Nickel and compounds	0.00%	0.0021	0.0021	lb/mmcf
TEU-2.1_NG	7782-49-2	Selenium and compounds	0.00%	0.000024	0.000024	lb/mmcf
TEU-2.1_NG	108-88-3	Toluene	0.00%	0.0265	0.0265	lb/mmcf
TEU-2.1_NG	7440-62-2	Vanadium (fume or dust)	0.00%	0.0023	0.0023	lb/mmcf
TEU-2.1_NG	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene	0.00%	0.0197	0.0197	lb/mmcf
TEU-2.1_NG	7440-66-6	Zinc and compounds	0.00%	0.0290	0.0290	lb/mmcf
TEU-2.1_OIL	71-43-2	Benzene	0.00%	0.0044	0.0044	lb/M gal
TEU-2.1_OIL	106-99-0	1,3-Butadiene	0.00%	0.0148	0.0148	lb/M gal
TEU-2.1_OIL	7440-43-9	Cadmium and compounds	0.00%	0.0015	0.0015	lb/M gal
TEU-2.1_OIL	50-00-0	Formaldehyde	0.00%	0.3506	0.3506	lb/M gal
TEU-2.1_OIL	18540-29-9	Chromium VI, chromate and dichromate particulate	0.00%	0.0001	0.0001	lb/M gal
TEU-2.1_OIL	7440-38-2	Arsenic and compounds	0.00%	0.0016	0.0016	lb/M gal
TEU-2.1_OIL	7439-92-1	Lead and compounds	0.00%	0.0083	0.0083	lb/M gal
TEU-2.1_OIL	7440-02-0	Nickel and compounds	0.00%	0.0039	0.0039	lb/M gal
TEU-2.1_OIL	401	Polycyclic aromatic hydrocarbons (PAHs)	0.00%	0.0445	0.0445	lb/M gal
TEU-2.1_OIL	50-32-8	Benzo[a]pyrene	0.00%	0.0000357	0.0000357	lb/M gal
TEU-2.1_OIL	91-20-3	Naphthalene	0.00%	0.0053	0.0053	lb/M gal
TEU-2.1_OIL	75-07-0	Acetaldehyde	0.00%	0.3506	0.3506	lb/M gal
TEU-2.1_OIL	107-02-8	Acrolein	0.00%	0.3506	0.3506	lb/M gal
TEU-2.1_OIL	7664-41-7	Ammonia	0.00%	0.80	0.80	lb/M gal
TEU-2.1_OIL	7440-50-8	Copper and compounds	0.00%	0.0041	0.0041	lb/M gal
TEU-2.1_OIL	100-41-4	Ethyl benzene	0.00%	0.0002	0.0002	lb/M gal
TEU-2.1_OIL	110-54-3	Hexane	0.00%	0.0035	0.0035	lb/M gal
TEU-2.1_OIL	7647-01-0	Hydrochloric acid	0.00%	0.1863	0.1863	lb/M gal
TEU-2.1_OIL	7439-96-5	Manganese and compounds	0.00%	0.0031	0.0031	lb/M gal
TEU-2.1_OIL	7439-97-6	Mercury and compounds	0.00%	0.0020	0.0020	lb/M gal
TEU-2.1_OIL	7782-49-2	Selenium and compounds	0.00%	0.0022	0.0022	lb/M gal
TEU-2.1_OIL	108-88-3	Toluene	0.00%	0.0044	0.0044	lb/M gal
TEU-2.1_OIL	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene	0.00%	0.0016	0.0016	lb/M gal
TEU-2.3_NG	71-43-2	Benzene	0.00%	0.0058	0.0058	lb/mmcf
TEU-2.3_NG	50-00-0	Formaldehyde	0.00%	0.0123	0.0123	lb/mmcf
TEU-2.3_NG	401	Polycyclic aromatic hydrocarbons (PAHs)	0.00%	0.0001	0.0001	lb/mmcf
TEU-2.3_NG	50-32-8	Benzo[a]pyrene	0.00%	0.0000012	0.0000012	lb/mmcf
TEU-2.3_NG	91-20-3	Naphthalene	0.00%	0.0003	0.0003	lb/mmcf
TEU-2.3_NG	75-07-0	Acetaldehyde	0.00%	0.0031	0.0031	lb/mmcf
TEU-2.3_NG	107-02-8	Acrolein	0.00%	0.0027	0.0027	lb/mmcf
TEU-2.3_NG	7664-41-7	Ammonia	0.00%	3.2	3.2	lb/mmcf
TEU-2.3_NG	7440-38-2	Arsenic and compounds	0.00%	0.0002	0.0002	lb/mmcf
TEU-2.3_NG	7440-39-3	Barium and compounds	0.00%	0.0044	0.0044	lb/mmcf
TEU-2.3_NG	7440-41-7	Beryllium and compounds	0.00%	0.000012	0.000012	lb/mmcf
TEU-2.3_NG	7440-43-9	Cadmium and compounds	0.00%	0.0011	0.0011	lb/mmcf
TEU-2.3_NG	18540-29-9	Chromium VI, chromate and dichromate particulate	0.00%	0.0014	0.0014	lb/mmcf
TEU-2.3_NG	7440-48-4	Cobalt and compounds	0.00%	0.000084	0.000084	lb/mmcf
TEU-2.3_NG	7440-50-8	Copper and compounds	0.00%	0.00085	0.00085	lb/mmcf
TEU-2.3_NG	100-41-4	Ethyl benzene	0.00%	0.0069	0.0069	lb/mmcf
TEU-2.3_NG	110-54-3	Hexane	0.00%	0.0046	0.0046	lb/mmcf
TEU-2.3_NG	7439-92-1	Lead and compounds	0.00%	0.0005	0.0005	lb/mmcf
TEU-2.3_NG	7439-96-5	Manganese and compounds	0.00%	0.0004	0.0004	lb/mmcf

SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	2.13E+00		0.0	5.84E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	2.32E-01		0.0	6.34E-04
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.76E-01		0.0	4.82E-04
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.20E-01		0.0	3.30E-04
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	5.09E-01		0.0	1.40E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	9.72E-01		0.0	2.66E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.11E-02		0.0	3.04E-05
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.23E+01		0.0	3.36E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.06E+00		0.0	2.92E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	9.12E+00		0.0	2.50E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.34E+01		0.0	3.68E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	5.72E-01		0.0	5.32E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.92E+00		0.0	1.79E-01
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.95E-01		0.0	1.82E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	4.56E+01		0.0	4.24E+00
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.30E-02		0.0	1.21E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	2.08E-01		0.0	1.94E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.08E+00		0.0	1.00E-01
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	5.07E-01		0.0	4.72E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	5.79E+00		0.0	5.38E-01
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	4.64E-03		0.0	4.32E-04
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	6.89E-01		0.0	6.41E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	4.56E+01		0.0	4.24E+00
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	4.56E+01		0.0	4.24E+00
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	1.04E+02		0.0	9.68E+00
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	5.33E-01		0.0	4.96E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	2.60E-02		0.0	2.42E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	4.55E-01		0.0	4.24E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	2.42E+01		0.0	2.25E+00
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	4.03E-01		0.0	3.75E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	2.60E-01		0.0	2.42E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	2.86E-01		0.0	2.66E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	5.72E-01		0.0	5.32E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	0.0	2.08E-01		0.0	1.94E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	2.86E+00	4.30E+00		7.84E-03	1.18E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	6.07E+00	9.11E+00		1.66E-02	2.50E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	4.94E-02	7.41E-02		1.35E-04	2.03E-04
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	5.92E-04	8.89E-04		1.62E-06	2.44E-06
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.48E-01	2.22E-01		4.06E-04	6.09E-04
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.53E+00	2.30E+00		4.19E-03	6.29E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.33E+00	2.00E+00		3.65E-03	5.48E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.58E+03	2.37E+03		4.33E+00	6.50E+00
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	9.87E-02	1.48E-01		2.70E-04	4.06E-04
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	2.17E+00	3.26E+00		5.95E-03	8.93E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	5.92E-03	8.89E-03		1.62E-05	2.44E-05
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	5.43E-01	8.15E-01		1.49E-03	2.23E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	6.91E-01	1.04E+00		1.89E-03	2.84E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	4.15E-02	6.22E-02		1.14E-04	1.71E-04
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	4.19E-01	6.30E-01		1.15E-03	1.73E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	3.41E+00	5.11E+00		9.33E-03	1.40E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	2.27E+00	3.41E+00		6.22E-03	9.34E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	2.47E-01	3.71E-01		6.76E-04	1.02E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.88E-01	2.82E-01		5.14E-04	7.71E-04

TEU-2.3_NG	7439-97-6	Mercury and compounds	0.00%	0.0003	0.0003	lb/mmcf
TEU-2.3_NG	1313-27-5	Molybdenum trioxide	0.00%	0.0017	0.0017	lb/mmcf
TEU-2.3_NG	7440-02-0	Nickel and compounds	0.00%	0.0021	0.0021	lb/mmcf
TEU-2.3_NG	7782-49-2	Selenium and compounds	0.00%	0.000024	0.000024	lb/mmcf
TEU-2.3_NG	108-88-3	Toluene	0.00%	0.0265	0.0265	lb/mmcf
TEU-2.3_NG	7440-62-2	Vanadium (fume or dust)	0.00%	0.0023	0.0023	lb/mmcf
TEU-2.3_NG	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene	0.00%	0.0197	0.0197	lb/mmcf
TEU-2.3_NG	7440-66-6	Zinc and compounds	0.00%	0.0290	0.0290	lb/mmcf
TEU-2.3_OIL	71-43-2	Benzene	0.00%	0.0044	0.0044	lb/M gal
TEU-2.3_OIL	106-99-0	1,3-Butadiene	0.00%	0.0148	0.0148	lb/M gal
TEU-2.3_OIL	7440-43-9	Cadmium and compounds	0.00%	0.0015	0.0015	lb/M gal
TEU-2.3_OIL	50-00-0	Formaldehyde	0.00%	0.3506	0.3506	lb/M gal
TEU-2.3_OIL	18540-29-9	Chromium VI, chromate and dichromate particulate	0.00%	0.0001	0.0001	lb/M gal
TEU-2.3_OIL	7440-38-2	Arsenic and compounds	0.00%	0.0016	0.0016	lb/M gal
TEU-2.3_OIL	7439-92-1	Lead and compounds	0.00%	0.0083	0.0083	lb/M gal
TEU-2.3_OIL	7440-02-0	Nickel and compounds	0.00%	0.0039	0.0039	lb/M gal
TEU-2.3_OIL	401	Polycyclic aromatic hydrocarbons (PAHs)	0.00%	0.0445	0.0445	lb/M gal
TEU-2.3_OIL	50-32-8	Benzo[a]pyrene	0.00%	0.0000357	0.0000357	lb/M gal
TEU-2.3_OIL	91-20-3	Naphthalene	0.00%	0.0053	0.0053	lb/M gal
TEU-2.3_OIL	75-07-0	Acetaldehyde	0.00%	0.3506	0.3506	lb/M gal
TEU-2.3_OIL	107-02-8	Acrolein	0.00%	0.3506	0.3506	lb/M gal
TEU-2.3_OIL	7664-41-7	Ammonia	0.00%	0.80	0.80	lb/M gal
TEU-2.3_OIL	7440-50-8	Copper and compounds	0.00%	0.0041	0.0041	lb/M gal
TEU-2.3_OIL	100-41-4	Ethyl benzene	0.00%	0.0002	0.0002	lb/M gal
TEU-2.3_OIL	110-54-3	Hexane	0.00%	0.0035	0.0035	lb/M gal
TEU-2.3_OIL	7647-01-0	Hydrochloric acid	0.00%	0.1863	0.1863	lb/M gal
TEU-2.3_OIL	7439-96-5	Manganese and compounds	0.00%	0.0031	0.0031	lb/M gal
TEU-2.3_OIL	7439-97-6	Mercury and compounds	0.00%	0.0020	0.0020	lb/M gal
TEU-2.3_OIL	7782-49-2	Selenium and compounds	0.00%	0.0022	0.0022	lb/M gal
TEU-2.3_OIL	108-88-3	Toluene	0.00%	0.0044	0.0044	lb/M gal
TEU-2.3_OIL	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene	0.00%	0.0016	0.0016	lb/M gal

SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.28E-01	1.93E-01		3.52E-04	5.28E-04
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	8.14E-01	1.22E+00		2.23E-03	3.35E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.04E+00	1.56E+00		2.84E-03	4.26E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.18E-02	1.78E-02		3.24E-05	4.87E-05
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.31E+01	1.96E+01		3.58E-02	5.38E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.14E+00	1.70E+00		3.11E-03	4.67E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	9.72E+00	1.46E+01		2.66E-02	4.00E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.43E+01	2.15E+01		3.92E-02	5.89E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	2.17E+00	3.26E+00		5.95E-03	7.34E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	7.30E+00	1.10E+01		2.00E-02	2.47E-01
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	7.40E-01	1.11E+00		2.03E-03	2.50E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.73E+02	2.60E+02		4.74E-01	5.85E+00
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	4.94E-02	7.41E-02		1.35E-04	1.67E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	7.90E-01	1.19E+00		2.16E-03	2.67E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	4.10E+00	6.15E+00		1.12E-02	1.38E-01
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.92E+00	2.89E+00		5.27E-03	6.51E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	2.20E+01	3.30E+01		6.02E-02	7.42E-01
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.76E-02	2.65E-02		4.83E-05	5.95E-04
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	2.62E+00	3.93E+00		7.17E-03	8.84E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.73E+02	2.60E+02		4.74E-01	5.85E+00
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.73E+02	2.60E+02		4.74E-01	5.85E+00
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	3.95E+02	5.93E+02		1.08E+00	1.33E+01
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	2.02E+00	3.04E+00		5.54E-03	6.84E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	9.87E-02	1.48E-01		2.70E-04	3.34E-03
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.73E+00	2.59E+00		4.73E-03	5.84E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	9.19E+01	1.38E+02		2.52E-01	3.11E+00
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.53E+00	2.30E+00		4.19E-03	5.17E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	9.87E-01	1.48E+00		2.70E-03	3.34E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	1.09E+00	1.63E+00		2.97E-03	3.67E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	2.17E+00	3.26E+00		5.95E-03	7.34E-02
SCAQMD AB2588 for all except BaP from AP-42; NH3 value assumes no NOx controls	7.90E-01	1.19E+00		2.16E-03	2.67E-02

INSTRUCTIONS:
- **Toxic Emissions Unit and Stack/Fugitive ID:** use IDs consistent with permit identifiers if applicable.
- **Emission Units or Activity Description:** where possible, maintain consistency with permitted/reported Units/Type.
- **Material Name:** this is the commercial name that is provided on the manufacturer's SDS.
- **Material Waste:** this category should be used to account for all waste material shipped off-site, lost to drain, or incorporated into product.
- **Max Daily Activity:** for semi-continuous/batch processes this value should account for co-occurring activities, process and/or maintenance, that would account for the potential maximum emissions activities for this pollutant.
  - **Actual:** values should be based on the last full year reported to DEQ, or estimates of normal activity (new sources).
  - **Capacity:** maximum activity value achievable with 100% operational up-time for this activity.
  - **Requested PTE:** values that a source is requesting to be permitted on that differ from "Actuals" and "Capacity".

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5/10/2021

Emissions Unit/Product Information

Toxics Emissions Unit ID	Emission Unit or Activity Description	Material Name
TEU-1	Microporous Plastic Production Operation (Carbon Beds and Fugitives)	NEU-TRI
TEU-2	Microporous Plastic Production Operation (Isopropanol for Original Pb-Acid Separator Spray Making System)	Isopropyl alcohol
TEU-3	Microporous Plastic Production Operation (SCP-940 White Ink for New Pb-Acid Separator Spray Marking System)	Isopropyl alcohol
TEU-5	Li-Ion Separator Coating Activity	Isopropyl alcohol
TEU-MISC	Miscellaneous material usage	3M Blue 72 Spray Adhesive
TEU-MISC	Miscellaneous material usage	Delo Grease EP NLGI 0, 00, 1, 2
TEU-MISC	Miscellaneous material usage	Klean Strip Paint Thinner
TEU-MISC	Miscellaneous material usage	Pelseal 2531 (A solution of fluoroelastomer liquid)
TEU-MISC	Miscellaneous material usage	R-1 and R-22 Ink
TEU-MISC	Miscellaneous material usage	SUNNYSIDE LACQUER THINNER
TEU-MISC	Miscellaneous material usage	ACE Premium Enamel Primer Gray
TEU-MISC	Miscellaneous material usage	ACE Premium Enamel Primer Red Oxide
TEU-MISC	Miscellaneous material usage	ACE RUST STOP Enamel Safety Colors, Safety Yellow
TEU-MISC	Miscellaneous material usage	ACE RUST STOP Indoor/Outdoor Enamel, Gloss Black
TEU-MISC	Miscellaneous material usage	Dual SUPERBOND Paint + Primer Gloss White
TEU-MISC	Miscellaneous material usage	Dykem Transparent Stain Aerosol - Steel Blue and Steel Red
TEU-MISC	Miscellaneous material usage	GLASS CLEANER
TEU-MISC	Miscellaneous material usage	KRYLON RUST TOUGH Enamel (aerosol) Gloss White
TEU-MISC	Miscellaneous material usage	NAPA Brakleen Brake Parts Cleaner
TEU-MISC	Miscellaneous material usage	NAPA EXTENDED LIFE CONCENTRATE ANTIFREEZE & COOLANT
TEU-MISC	Miscellaneous material usage	ROHPER LSPR 6PK FLAT HIGH TEMP BLACK
TEU-MISC	Miscellaneous material usage	RUST TOUGH Rust Preventive Enamel (Aerosol) Chestnut Brown
TEU-MISC	Miscellaneous material usage	RUST TOUGH Rust Preventive Enamel (Aerosol) Equipment Orange
TEU-MISC	Miscellaneous material usage	RUST TOUGH Rust Preventive Enamel (Aerosol) Light Machinery Gray (ASA-61)
TEU-MISC	Miscellaneous material usage	RUST TOUGH Rust Preventive Enamel (Aerosol) Safety Yellow (OSHA Yellow)
TEU-MISC	Miscellaneous material usage	STRUST +SSPR 6PK SEMIGL BLACK
TEU-MISC	Miscellaneous material usage	Acetone

Manufacturer	Stack/Fugitive Information		Material Usage						Material Waste					
	Emission Type (e.g. Point or Fugitive)	Stack or Fugitive ID	Annual - Chronic [lb/year]			Max Daily - Acute [lb/day]			Annual - Chronic [lb/year]			Max Daily - Acute [lb/day]		
			Actual	Requested PTE	Capacity	Actual	Requested PTE	Capacity	Actual	Requested PTE	Capacity	Actual	Requested PTE	Capacity
Blue Cube Operations LLC	Point	EU-1 Stack	66880.00			183.23			23060.00			63.18		
	Point	EU-1 Stack	3515.00	8576.00		9.63	23.50							
	Point	EU-1 Stack	8.00	18.00		0.02	0.05							
	Point	TBD	1786.00	4357.00		4.89	11.94							
3M Corporation	Point	TBD	299.84	731.61		0.82	2.00							
Chevron Canada Limited	Point	TBD	1517.88	3703.63		4.16	10.15							
W.M. BARR & COMPANY	Point	TBD	847.84	2068.74		2.32	5.67							
Pelseal Technologies LLC	Point	TBD	18.63	45.45		0.05	0.12							
ITW Professional Brands	Point	TBD	13.34	32.56		0.04	0.09							
SUNNYSIDE CORPORATION	Point	TBD	419.78	1024.26		1.15	2.81							
ACE HARDWARE CORPORATION	Point	TBD	13.18	32.15		0.04	0.09							
ACE HARDWARE CORPORATION	Point	TBD	6.34	15.47		0.02	0.04							
ACE HARDWARE CORPORATION	Point	TBD	6.26	15.26		0.02	0.04							
ACE HARDWARE CORPORATION	Point	TBD	2.03	4.95		0.01	0.01							
KRYLON PRODUCTS	Point	TBD	21.02	51.28		0.06	0.14							
ITW Professional Brands	Point	TBD	8.34	20.35		0.02	0.06							
Sprayway, Inc.	Point	TBD	13.36	32.59		0.04	0.09							
KRYLON PRODUCTS	Point	TBD	26.69	65.12		0.07	0.18							
CRC Industries, Inc.	Point	TBD	13.51	32.97		0.04	0.09							
Old World Industries, Inc.	Point	TBD	37.36	91.17		0.10	0.25							
Rust-Oleum Corporation	Point	TBD	6.86	16.73		0.02	0.05							
KRYLON PRODUCTS	Point	TBD	4.28	10.45		0.01	0.03							
KRYLON PRODUCTS	Point	TBD	6.42	15.67		0.02	0.04							
KRYLON PRODUCTS	Point	TBD	6.67	16.28		0.02	0.04							
KRYLON PRODUCTS	Point	TBD	6.59	16.08		0.02	0.04							
Rust-Oleum Corporation	Point	TBD	7.06	17.24		0.02	0.05							
Blue Cube Operations	Point	TBD	336.00	819.84		0.92	2.25							

INSTRUCTIONS:

- **Material Name:** must be consistent with **Material Name** on "*Material Balance Activities*" worksheet *Column C*.
- **CAS or DEQ ID:** either use the drop-down provided or simply cut and paste each pollutant CAS number or DEQ ID (see the DEQ Pollutant List worksheet) emitted by the referenced TEU.
- **Chemical Name:** if a CAS number or DEQ ID is entered in *Column C, Column D* should perform a lookup from the DEQ Air Toxics list; alternatively, simply cut and paste the chemical names that correspond to the CAS numbers/DEQ ID in *Column C* if applicable.
- **Control Efficiency:** enter the pollutant specific control efficiency - this should include all capture and removal process efficiencies applicable to each individual pollutant.
- **Percent Composition:** provide raw percent composition values for the pollutant as reported by supporting manufacturer documentation.
- **Reference/Notes:** provide references and notes for control efficiencies and/or any adjustments applied to material usage data via **Material Waste** (*Columns M-R*) on the "*Material Balance Activities*" worksheet.

Calculated Emissions: follow guidance in "*Form Instructions*" worksheet for specific formulas.

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Toxics Emissions Unit ID	Material Name	Pollutant Information		
		CAS or DEQ ID	Chemical Name	Control Efficiency
TEU-1	NEU-TRI	79-01-6	Trichloroethene (TCE, trichloroethylene)	See Note
TEU-1	NEU-TRI	106-88-7	1,2-Epoxybutane	See Note
TEU-2	Isopropyl alcohol	67-63-0	Isopropyl alcohol	0.00%
TEU-3	Isopropyl alcohol	67-63-0	Isopropyl alcohol	0.00%
TEU-5	Isopropyl alcohol	67-63-0	Isopropyl alcohol	0.00%
TEU-MISC	3M Blue 72 Spray Adhesive	110-82-7	Cyclohexane	0.00%
TEU-MISC	3M Blue 72 Spray Adhesive	67-56-1	Methanol	0.00%
TEU-MISC	Klean Strip Paint Thinner	526-73-8	1,2,3-Trimethylbenzene	0.00%
TEU-MISC	Pelseal 2531 (A solution of fluoroelastomer liquid)	78-93-3	2-Butanone (Methyl ethyl ketone)	0.00%
TEU-MISC	R-1 and R-22 Ink	111-46-6	Diethylene glycol	0.00%
TEU-MISC	SUNNYSIDE LACQUER THINNER	100-41-4	Ethyl benzene	0.00%
TEU-MISC	SUNNYSIDE LACQUER THINNER	108-88-3	Toluene	0.00%
TEU-MISC	SUNNYSIDE LACQUER THINNER	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene	0.00%
TEU-MISC	SUNNYSIDE LACQUER THINNER	67-56-1	Methanol	0.00%
TEU-MISC	ACE Premium Enamel Primer Gray	108-88-3	Toluene	0.00%
TEU-MISC	ACE Premium Enamel Primer Red Oxide	108-88-3	Toluene	0.00%
TEU-MISC	ACE RUST STOP Enamel Safety Colors, Safety Yellow	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene	0.00%
TEU-MISC	ACE RUST STOP Indoor/Outdoor Enamel, Gloss Black	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene	0.00%
TEU-MISC	Dual SUPERBOND Paint + Primer Gloss White	108-88-3	Toluene	0.00%
TEU-MISC	Dykem Transparent Stain Aerosol - Steel Blue and Steel Red	67-63-0	Isopropyl alcohol	0.00%
TEU-MISC	Dykem Transparent Stain Aerosol - Steel Blue and Steel Red	71-36-3	n-Butyl alcohol	0.00%
TEU-MISC	GLASS CLEANER	111-76-2	Ethylene glycol monobutyl ether	0.00%
TEU-MISC	KRYLON RUST TOUGH Enamel (aerosol) Gloss White	108-10-1	Methyl isobutyl ketone (MIBK, Hexone)	0.00%
TEU-MISC	KRYLON RUST TOUGH Enamel (aerosol) Gloss White	108-88-3	Toluene	0.00%
TEU-MISC	KRYLON RUST TOUGH Enamel (aerosol) Gloss White	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene	0.00%
TEU-MISC	NAPA Brakleen Brake Parts Cleaner	127-18-4	Tetrachloroethene (Perchloroethylene)	0.00%
TEU-MISC	NAPA EXTENDED LIFE CONCENTRATE ANTIFREEZE & COOLANT	111-46-6	Diethylene glycol	0.00%
TEU-MISC	ROHPER LSPR 6PK FLAT HIGH TEMP BLACK	108-88-3	Toluene	0.00%
TEU-MISC	ROHPER LSPR 6PK FLAT HIGH TEMP BLACK	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene	0.00%
TEU-MISC	RUST TOUGH Rust Preventive Enamel (Aerosol) Chestnut Brown	108-88-3	Toluene	0.00%
TEU-MISC	RUST TOUGH Rust Preventive Enamel (Aerosol) Equipment Orange	108-88-3	Toluene	0.00%
TEU-MISC	RUST TOUGH Rust Preventive Enamel (Aerosol) Light Machinery Gray (ASA-61)	108-88-3	Toluene	0.00%
TEU-MISC	RUST TOUGH Rust Preventive Enamel (Aerosol) Safety Yellow (OSHA Yellow)	100-41-4	Ethyl benzene	0.00%
TEU-MISC	RUST TOUGH Rust Preventive Enamel (Aerosol) Safety Yellow (OSHA Yellow)	108-10-1	Methyl isobutyl ketone (MIBK, Hexone)	0.00%
TEU-MISC	RUST TOUGH Rust Preventive Enamel (Aerosol) Safety Yellow (OSHA Yellow)	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene	0.00%
TEU-MISC	STRUST +SSPR 6PK SEMIGL BLACK	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene	0.00%
TEU-MISC	Acetone	67-64-1	Acetone	0.00%

Emissions Data		Calculated Emissions					
		Annual Emissions - Chronic [lb/yr]			Total Daily Emissions - Acute [lb/day]		
Percent Composition	Reference/Notes	Actual	Requested PTE	Capacity	Actual	Requested PTE	Capacity
99.50%		43600.90			119.45		
0.50%		219.10			0.60		
100.00%		3515.00	8576.00		9.63	23.50	
100.00%		8.00	18.00		0.02	0.05	
100.00%		1786.00	4357.00		4.89	11.94	
10.00%		29.98	73.00		8.21E-02	2.00E-01	
0.40%		1.20	3.00		3.29E-03	8.22E-03	
5.00%		42.39	103.00		1.16E-01	2.82E-01	
100.00%		18.63	45.00		5.10E-02	1.23E-01	
5.00%		0.67	1.63		1.83E-03	4.47E-03	
5.00%		20.99	51.00		5.75E-02	1.40E-01	
13.00%		54.57	133.00		1.50E-01	3.64E-01	
10.00%		41.98	102.00		1.15E-01	2.79E-01	
30.00%		125.93	307.00		3.45E-01	8.41E-01	
16.40%		2.16	5.27		5.92E-03	1.44E-02	
17.10%		1.08	2.64		2.97E-03	7.23E-03	
9.00%		0.56	1.37		1.54E-03	3.75E-03	
10.00%		0.20	0.50		5.56E-04	1.37E-03	
12.39%		2.60	6.35		7.13E-03	1.74E-02	
2.66%		0.22	0.54		6.08E-04	1.48E-03	
8.23%		0.69	1.67		1.88E-03	4.58E-03	
10.00%		1.34	3.26		3.66E-03	8.93E-03	
4.01%		1.07	2.61		2.93E-03	7.15E-03	
9.73%		2.60	6.34		7.11E-03	1.74E-02	
2.11%		0.56	1.37		1.54E-03	3.75E-03	
100.00%		13.51	33.00		3.70E-02	9.04E-02	
5.00%		1.87	4.56		5.12E-03	1.25E-02	
25.00%		1.71	4.18		4.70E-03	1.15E-02	
10.00%		0.69	1.67		1.88E-03	4.58E-03	
16.24%		0.70	1.70		1.90E-03	4.66E-03	
15.77%		1.01	2.47		2.77E-03	6.77E-03	
13.72%		0.92	2.23		2.51E-03	6.11E-03	
14.81%		0.98	2.38		2.67E-03	6.52E-03	
13.60%		0.90	2.19		2.45E-03	6.00E-03	
7.56%		0.50	1.22		1.36E-03	3.34E-03	
10.00%		0.71	1.72		1.94E-03	4.71E-03	
100.00%		336.00	819.84		0.92	2.25	

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CASRN	Chemical Name
630-20-6	1,1,1,2-Tetrachloroethane
811-97-2	1,1,1,2-Tetrafluoroethane
71-55-6	1,1,1-Trichloroethane (methyl chloroform)
79-34-5	1,1,2,2-Tetrachloroethane
79-00-5	1,1,2-Trichloroethane (vinyl trichloride)
75-34-3	1,1-Dichloroethane (ethylidene dichloride)
75-37-6	1,1-Difluoroethane
57-14-7	1,1-Dimethylhydrazine
67562-39-4	1,2,3,4,6,7,8-Heptachlorodibenzofuran (HpCDF)
35822-46-9	1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin (HpCDD)
55673-89-7	1,2,3,4,7,8,9-Heptachlorodibenzofuran (HpCDF)
70648-26-9	1,2,3,4,7,8-Hexachlorodibenzofuran (HxCDF)
39227-28-6	1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin (HxCDD)
57117-44-9	1,2,3,6,7,8-Hexachlorodibenzofuran (HxCDF)
57653-85-7	1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin (HxCDD)
72918-21-9	1,2,3,7,8,9-Hexachlorodibenzofuran (HxCDF)
19408-74-3	1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin (HxCDD)
57117-41-6	1,2,3,7,8-Pentachlorodibenzofuran (PeCDF)
40321-76-4	1,2,3,7,8-Pentachlorodibenzo-p-dioxin (PeCDD)
96-18-4	1,2,3-Trichloropropane
526-73-8	1,2,3-Trimethylbenzene
120-82-1	1,2,4-Trichlorobenzene
95-63-6	1,2,4-Trimethylbenzene
96-12-8	1,2-Dibromo-3-chloropropane (DBCP)
95-50-1	1,2-Dichlorobenzene
78-87-5	1,2-Dichloropropane (propylene dichloride)
540-73-8	1,2-Dimethylhydrazine
122-66-7	1,2-Diphenylhydrazine (hydrazobenzene)
106-88-7	1,2-Epoxybutane
75-55-8	1,2-Propyleneimine (2-methylaziridine)
108-67-8	1,3,5-Trimethylbenzene
106-99-0	1,3-Butadiene
541-73-1	1,3-Dichlorobenzene
542-75-6	1,3-Dichloropropene
1120-71-4	1,3-Propane sultone
123-91-1	1,4-Dioxane
42397-64-8	1,6-Dinitropyrene
42397-65-9	1,8-Dinitropyrene
555-84-0	1-[(5-Nitrofurfurylidene)-amino]-2-imidazolidinone
82-28-0	1-Amino-2-methylanthraquinone
106-94-5	1-Bromopropane (n-propyl bromide)
75-68-3	1-Chloro-1,1-difluoroethane
832-69-9	1-Methylphenanthrene
2381-21-7	1-Methylpyrene
5522-43-0	1-Nitropyrene
540-84-1	2,2,4-Trimethylpentane
60851-34-5	2,3,4,6,7,8-Hexachlorodibenzofuran (HxCDF)
58-90-2	2,3,4,6-Tetrachlorophenol
57117-31-4	2,3,4,7,8-Pentachlorodibenzofuran (PeCDF)
51207-31-9	2,3,7,8-Tetrachlorodibenzofuran (TcDF)
1746-01-6	2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)
96-13-9	2,3-Dibromo-1-propanol
95-95-4	2,4,5-Trichlorophenol
88-06-2	2,4,6-Trichlorophenol
53-19-0	2,4'-DDD (2,4'-dichlorodiphenyldichloroethane)
3424-82-6	2,4'-DDE (2,4'-dichlorodiphenyldichloroethene)
789-02-6	2,4'-DDT (2,4'-dichlorodiphenyltrichloroethane)
615-05-4	2,4-Diaminoanisole
39156-41-7	2,4-Diaminoanisole sulfate
95-80-7	2,4-Diaminotoluene (2,4-toluene diamine)
120-83-2	2,4-Dichlorophenol
51-28-5	2,4-Dinitrophenol
121-14-2	2,4-Dinitrotoluene
606-20-2	2,6-Dinitrotoluene
53-96-3	2-Acetylaminofluorene

68006-83-7	2-Amino-3-methyl-9H pyrido[2,3-b]indole
76180-96-6	2-Amino-3-methylimidazo-[4,5-f]quinoline
712-68-5	2-Amino-5-(5-nitro-2-furyl)-1,3,4-thiadiazole
117-79-3	2-Aminoanthraquinone
78-93-3	2-Butanone (methyl ethyl ketone)
532-27-4	2-Chloroacetophenone
95-57-8	2-Chlorophenol
91-57-6	2-Methyl naphthalene
129-15-7	2-Methyl-1-nitroanthraquinone
75-86-5	2-Methyllactonitrile (acetone cyanohydrin)
109-06-8	2-Methylpyridine
91-59-8	2-Naphthylamine
607-57-8	2-Nitrofluorene
79-46-9	2-Nitropropane
90-43-7	2-Phenylphenol
91-94-1	3,3'-Dichlorobenzidine
119-90-4	3,3'-Dimethoxybenzidine
119-93-7	3,3'-Dimethylbenzidine (o-tolidine)
6109-97-3	3-Amino-9-ethylcarbazole hydrochloride
563-47-3	3-Chloro-2-methyl-1-propene
56-49-5	3-Methylcholanthrene
72-54-8	4,4'-DDD (4,4'-dichlorodiphenyldichloroethane)
72-55-9	4,4'-DDE (4,4'-dichlorodiphenyldichloroethene)
101-80-4	4,4'-Diaminodiphenyl ether
80-05-7	4,4'-Isopropylidenediphenol (bisphenol A)
101-14-4	4,4'-Methylene bis(2-chloroaniline) (MOCA)
838-88-0	4,4'-Methylene bis(2-methylaniline)
101-61-1	4,4'-Methylene bis(N,N'-dimethyl)aniline
101-77-9	4,4'-Methylenedianiline (and its dichloride)
13552-44-8	4,4'-Methylenedianiline dihydrochloride
139-65-1	4,4'-Thiodianiline
534-52-1	4,6-Dinitro-o-cresol (and salts)
92-67-1	4-Aminobiphenyl
95-83-0	4-Chloro-o-phenylenediamine
60-11-7	4-Dimethylaminoazobenzene
92-93-3	4-Nitrobiphenyl
100-02-7	4-Nitrophenol
57835-92-4	4-Nitropyrene
104-40-5	4-Nonylphenol (and ethoxylates)
100-40-3	4-Vinylcyclohexene
3697-24-3	5-Methylchrysene
602-87-9	5-Nitroacenaphthene
99-59-2	5-Nitro-o-anisidine
7496-02-8	6-Nitrochrysene
57-97-6	7,12-Dimethylbenz[a]anthracene
194-59-2	7H-Dibenzo[c,g]carbazole
26148-68-5	A-alpha-c(2-amino-9h-pyrido[2,3-b]indole)
83-32-9	Acenaphthene
208-96-8	Acenaphthylene
75-07-0	Acetaldehyde
60-35-5	Acetamide
67-64-1	Acetone
75-05-8	Acetonitrile
98-86-2	Acetophenone
107-02-8	Acrolein
79-06-1	Acrylamide
79-10-7	Acrylic acid
107-13-1	Acrylonitrile
50-76-0	Actinomycin D
1596-84-5	Alar
309-00-2	Aldrin
107-05-1	Allyl chloride
319-84-6	alpha-Hexachlorocyclohexane
7429-90-5	Aluminum and compounds
1344-28-1	Aluminum oxide (fibrous forms)
61-82-5	Amitrole
7664-41-7	Ammonia
7803-63-6	Ammonium bisulfate
6484-52-2	Ammonium nitrate
7783-20-2	Ammonium sulfate
62-53-3	Aniline
191-26-4	Anthanthrene
120-12-7	Anthracene

7440-36-0	Antimony and compounds
1309-64-4	Antimony trioxide
140-57-8	Aramite
7440-38-2	Arsenic and compounds
7784-42-1	Arsine
1332-21-4	Asbestos
492-80-8	Auramine
115-02-6	Azaserine
446-86-6	Azathioprine
103-33-3	Azobenzene
7440-39-3	Barium and compounds
56-55-3	Benz[a]anthracene
71-43-2	Benzene
92-87-5	Benzidine (and its salts)
50-32-8	Benzo[a]pyrene
205-99-2	Benzo[b]fluoranthene
205-12-9	Benzo[c]fluorene
192-97-2	Benzo[e]pyrene
191-24-2	Benzo[g,h,i]perylene
205-82-3	Benzo[j]fluoranthene
207-08-9	Benzo[k]fluoranthene
271-89-6	Benzofuran
98-07-7	Benzoic trichloride (benzotrichloride)
98-88-4	Benzoyl chloride
94-36-0	Benzoyl peroxide
100-44-7	Benzyl chloride
1694-09-3	Benzyl Violet 4B
7440-41-7	Beryllium and compounds
1304-56-9	Beryllium oxide
13510-49-1	Beryllium sulfate
3068-88-0	beta-Butyrolactone
319-85-7	beta-Hexachlorocyclohexane
57-57-8	beta-Propiolactone
92-52-4	Biphenyl
111-44-4	bis(2-Chloroethyl) ether (BCEE)
103-23-1	bis(2-Ethylhexyl) adipate
117-81-7	bis(2-Ethylhexyl) phthalate (DEHP)
542-88-1	bis(Chloromethyl) ether
7726-95-6	Bromine and compounds
7789-30-2	Bromine pentafluoride
75-27-4	Bromodichloromethane
75-25-2	Bromoform
74-83-9	Bromomethane (methyl bromide)
141-32-2	Butyl acrylate
85-68-7	Butyl benzyl phthalate
25013-16-5	Butylated hydroxyanisole
569-61-9	C.I. Basic Red 9 monohydrochloride
7440-43-9	Cadmium and compounds
156-62-7	Calcium cyanamide
105-60-2	Caprolactam
2425-06-1	Captafol
133-06-2	Captan
63-25-2	Carbaryl
86-74-8	Carbazole
89	Carbon black extracts
75-15-0	Carbon disulfide
56-23-5	Carbon tetrachloride
463-58-1	Carbonyl sulfide
9000-07-1	Carrageenan (degraded)
120-80-9	Catechol
351	Ceramic fibers
133-90-4	Chloramben
305-03-3	Chlorambucil
57-74-9	Chlordane
143-50-0	Chlordecone
115-28-6	Chlorendic acid
76-13-1	Chlorinated fluorocarbon (1,1,2-trichloro-1,2,2-trifluoroethane, CFC-
108171-26-2	Chlorinated paraffins
7782-50-5	Chlorine
10049-04-4	Chlorine dioxide
79-11-8	Chloroacetic acid
85535-84-8	Chloroalkanes C10-13 (chlorinated paraffins)
108-90-7	Chlorobenzene

510-15-6	Chlorobenzilate (ethyl-4,4'-dichlorobenzilate)
75-45-6	Chlorodifluoromethane (Freon 22)
75-00-3	Chloroethane (ethyl chloride)
67-66-3	Chloroform
74-87-3	Chloromethane (methyl chloride)
107-30-2	Chloromethyl methyl ether (technical grade)
76-06-2	Chloropicrin
126-99-8	Chloroprene
1897-45-6	Chlorothalonil
54749-90-5	Chlorozotocin
7738-94-5	Chromic(VI) acid, including chromic acid aerosol mist and chromium
18540-29-9	Chromium VI, chromate and dichromate particulate
218-01-9	Chrysene
87-29-6	Cinnamyl anthranilate
7440-48-4	Cobalt and compounds
148	Coke oven emissions
7440-50-8	Copper and compounds
150	Creosotes
1319-77-3	Cresols (mixture), including m-cresol, o-cresol, p-cresol
4170-30-3	Crotonaldehyde
80-15-9	Cumene hydroperoxide
135-20-6	Cupferron
74-90-8	Cyanide, hydrogen
110-82-7	Cyclohexane
108-93-0	Cyclohexanol
66-81-9	Cycloheximide
27208-37-3	Cyclopenta[c,d]pyrene
50-18-0	Cyclophosphamide (anhydrous)
6055-19-2	Cyclophosphamide (hydrated)
5160-02-1	D & C Red No. 9
4342-03-4	Dacarbazine
117-10-2	Danthron (chrysazin)
3547-04-4	DDE (1-chloro-4-[1-(4-chlorophenyl)ethyl]benzene)
50-29-3	DDT
333-41-5	Diazinon
334-88-3	Diazomethane
226-36-8	Dibenz[a,h]acridine
53-70-3	Dibenz[a,h]anthracene
224-42-0	Dibenz[a,j]acridine
5385-75-1	Dibenzo[a,e]fluoranthene
192-65-4	Dibenzo[a,e]pyrene
189-64-0	Dibenzo[a,h]pyrene
189-55-9	Dibenzo[a,i]pyrene
191-30-0	Dibenzo[a,l]pyrene
132-64-9	Dibenzofuran
124-48-1	Dibromochloromethane
84-74-2	Dibutyl phthalate
75-71-8	Dichlorodifluoromethane (Freon 12)
75-43-4	Dichlorofluoromethane (Freon 21)
75-09-2	Dichloromethane (methylene chloride)
94-75-7	Dichlorophenoxyacetic acid, salts and esters (2,4-D)
62-73-7	Dichlorvos (DDVP)
115-32-2	Dicofol
84-61-7	Di-cyclohexyl phthalate (DCHP)
60-57-1	Dieldrin
200	Diesel particulate matter
111-42-2	Diethanolamine
64-67-5	Diethyl sulfate
111-46-6	Diethylene glycol
111-96-6	Diethylene glycol dimethyl ether
112-34-5	Diethylene glycol monobutyl ether
111-90-0	Diethylene glycol monoethyl ether
111-77-3	Diethylene glycol monomethyl ether
627-44-1	Diethylmercury
84-66-2	Diethylphthalate
101-90-6	Diglycidyl resorcinol ether
94-58-6	Dihydrosafrole
79-44-7	Dimethyl carbamoyl chloride
68-12-2	Dimethyl formamide
131-11-3	Dimethyl phthalate
77-78-1	Dimethyl sulfate
593-74-8	Dimethylmercury
513-37-1	Dimethylvinylchloride

630-93-3	Diphenylhydantoin
25265-71-8	Dipropylene glycol
34590-94-8	Dipropylene glycol monomethyl ether
1937-37-7	Direct Black 38
2602-46-2	Direct Blue 6
16071-86-6	Direct Brown 95 (technical grade)
2475-45-8	Disperse Blue 1
298-04-4	Disulfoton
106-89-8	Epichlorohydrin
227	Epoxy resins
12510-42-8	Erionite
140-88-5	Ethyl acrylate
100-41-4	Ethyl benzene
74-85-1	Ethylene
106-93-4	Ethylene dibromide (EDB, 1,2-dibromoethane)
107-06-2	Ethylene dichloride (EDC, 1,2-dichloroethane)
107-21-1	Ethylene glycol
629-14-1	Ethylene glycol diethyl ether
110-71-4	Ethylene glycol dimethyl ether
111-76-2	Ethylene glycol monobutyl ether
110-80-5	Ethylene glycol monoethyl ether
111-15-9	Ethylene glycol monoethyl ether acetate
109-86-4	Ethylene glycol monomethyl ether
110-49-6	Ethylene glycol monomethyl ether acetate
2807-30-9	Ethylene glycol monopropyl ether
75-21-8	Ethylene oxide
96-45-7	Ethylene thiourea
151-56-4	Ethyleneimine (aziridine)
10028-22-5	Ferric sulfate
206-44-0	Fluoranthene
86-73-7	Fluorene
239	Fluorides
7782-41-4	Fluorine gas
50-00-0	Formaldehyde
110-00-9	Furan
60568-05-0	Furmecyclox
3688-53-7	Furylfuramide
58-89-9	gamma-Hexachlorocyclohexane (Lindane)
352	Glasswool fibers
67730-11-4	Glu-P-1
67730-10-3	Glu-P-2
111-30-8	Glutaraldehyde
16568-02-8	Gyromitrin
2784-94-3	HC Blue 1
76-44-8	Heptachlor
1024-57-3	Heptachlor epoxide
118-74-1	Hexachlorobenzene
87-68-3	Hexachlorobutadiene
608-73-1	Hexachlorocyclohexanes (mixture) including but not limited to:
77-47-4	Hexachlorocyclopentadiene
67-72-1	Hexachloroethane
822-06-0	Hexamethylene-1,6-diisocyanate
680-31-9	Hexamethylphosphoramide
110-54-3	Hexane
302-01-2	Hydrazine
10034-93-2	Hydrazine sulfate
7647-01-0	Hydrochloric acid
10035-10-6	Hydrogen bromide
7664-39-3	Hydrogen fluoride
7783-06-4	Hydrogen sulfide
123-31-9	Hydroquinone
193-39-5	Indeno[1,2,3-cd]pyrene
10043-66-0	Iodine-131
13463-40-6	Iron pentacarbonyl
78-59-1	Isophorone
78-79-5	Isoprene, except from vegetative emission sources
67-63-0	Isopropyl alcohol
98-82-8	Isopropylbenzene (cumene)
303-34-4	Lasiocarpine
7439-92-1	Lead and compounds
18454-12-1	Lead chromate oxide
108-31-6	Maleic anhydride
7439-96-5	Manganese and compounds

108-39-4	m-Cresol
148-82-3	Melphalan
3223-07-2	Melphalan HCl
7439-97-6	Mercury and compounds
67-56-1	Methanol
72-43-5	Methoxychlor
60-34-4	Methyl hydrazine
74-88-4	Methyl iodide (iodomethane)
108-10-1	Methyl isobutyl ketone (MIBK, hexone)
624-83-9	Methyl isocyanate
80-62-6	Methyl methacrylate
66-27-3	Methyl methanesulfonate
1634-04-4	Methyl tert-butyl ether
101-68-8	Methylene diphenyl diisocyanate (MDI)
22967-92-6	Methylmercury
56-04-2	Methylthiouracil
90-94-8	Michler's ketone
349	Mineral fiber emissions from facilities manufacturing or processing g
350	Mineral fibers (fine mineral fibers which are man-made, and are airb
2385-85-5	Mirex
50-07-7	Mitomycin C
1313-27-5	Molybdenum trioxide
315-22-0	Monocrotaline
108-38-3	m-Xylene
134-62-3	N,N-Diethyltoluamide (DEET)
121-69-7	N,N-Dimethylaniline
531-82-8	N-[4-(5-Nitro-2-furyl)-2-thiazolyl]-acetamide
91-20-3	Naphthalene
71-36-3	n-Butyl alcohol
373-02-4	Nickel acetate
7440-02-0	Nickel and compounds
3333-67-3	Nickel carbonate
12607-70-4	Nickel carbonate hydroxide
13463-39-3	Nickel carbonyl
7718-54-9	Nickel chloride
365	Nickel compounds, insoluble
368	Nickel compounds, soluble
12054-48-7	Nickel hydroxide
13478-00-7	Nickel nitrate hexahydrate
1313-99-1	Nickel oxide
12035-72-2	Nickel subsulfide
7786-81-4	Nickel sulfate
10101-97-0	Nickel sulfate hexahydrate
11113-75-0	Nickel sulfide
1271-28-9	Nickelocene
3570-75-0	Nifurthiazole
7697-37-2	Nitric acid
139-13-9	Nitrilotriacetic acid
18662-53-8	Nitrilotriacetic acid, trisodium salt monohydrate
98-95-3	Nitrobenzene
1836-75-5	Nitrofen
59-87-0	Nitrofurazone
302-70-5	Nitrogen mustard N-oxide
70-25-7	N-Methyl-N-nitro-N-nitrosoguanidine
1116-54-7	N-Nitrosodiethanolamine
55-18-5	N-Nitrosodiethylamine
62-75-9	N-Nitrosodimethylamine
924-16-3	N-Nitrosodi-n-butylamine
86-30-6	N-Nitrosodiphenylamine
621-64-7	N-Nitrosodipropylamine
10595-95-6	N-Nitrosomethylethylamine
59-89-2	N-Nitrosomorpholine
759-73-9	N-Nitroso-N-ethylurea
684-93-5	N-Nitroso-N-methylurea
615-53-2	N-Nitroso-N-methylurethane
16543-55-8	N-Nitrosonornicotine
100-75-4	N-Nitrosopiperidine
930-55-2	N-Nitrosopyrrolidine
90-04-0	o-Anisidine
134-29-2	o-Anisidine hydrochloride
95-48-7	o-Cresol
39001-02-0	Octachlorodibenzofuran (OCDF)
3268-87-9	Octachlorodibenzo-p-dioxin (OCDD)

8014-95-7	Oleum (fuming sulfuric acid)
132-27-4	o-Phenylphenate, sodium
97-56-3	ortho-Aminoazotoluene
95-53-4	o-Toluidine
636-21-5	o-Toluidine hydrochloride
95-47-6	o-Xylene
56-38-2	Parathion
189084-64-8	PBDE-100 [2,2',4,4',6-pentabromodiphenyl ether]
182677-30-1	PBDE-138 [2,2',3,4,4',5'-hexabromodiphenyl ether]
68631-49-2	PBDE-153 [2,2',4,4',5,5'-hexabromodiphenyl ether]
207122-15-4	PBDE-154 [2,2',4,4',5,6'-hexabromodiphenyl ether]
207122-16-5	PBDE-183 [2,2',3,4,4',5',6-heptabromodiphenyl ether]
1163-19-5	PBDE-209 [decabromodiphenyl ether]
5436-43-1	PBDE-47 [2,2',4,4'-tetrabromodiphenyl ether]
60348-60-9	PBDE-99 [2,2',4,4',5-pentabromodiphenyl ether]
32598-14-4	PCB 105 [2,3,3',4,4'-pentachlorobiphenyl]
74472-37-0	PCB 114 [2,3,4,4',5-pentachlorobiphenyl]
31508-00-6	PCB 118 [2,3',4,4',5-pentachlorobiphenyl]
65510-44-3	PCB 123 [2,3',4,4',5'-pentachlorobiphenyl]
57465-28-8	PCB 126 [3,3',4,4',5-pentachlorobiphenyl]
38380-08-4	PCB 156 [2,3,3',4,4',5-hexachlorobiphenyl]
69782-90-7	PCB 157 [2,3,3',4,4',5'-hexachlorobiphenyl]
52663-72-6	PCB 167 [2,3',4,4',5,5'-hexachlorobiphenyl]
32774-16-6	PCB 169 [3,3',4,4',5,5'-hexachlorobiphenyl]
37680-65-2	PCB 18 [2,2',5-trichlorobiphenyl]
39635-31-9	PCB 189 [2,3,3',4,4',5,5'-heptachlorobiphenyl]
32598-13-3	PCB 77 [3,3',4,4'-tetrachlorobiphenyl]
70362-50-4	PCB 81 [3,4,4',5-tetrachlorobiphenyl]
37680-73-2	PCB-101 [2,2',4,5,5'-pentachlorobiphenyl]
38380-07-3	PCB-128 [2,2',3,3',4,4'-hexachlorobiphenyl]
35065-28-2	PCB-138 [2,2',3,4,4',5'-hexachlorobiphenyl]
35065-27-1	PCB-153 [2,2',4,4',5,5'-hexachlorobiphenyl]
35065-30-6	PCB-170 [2,2',3,3',4,4',5-heptachlorobiphenyl]
35065-29-3	PCB-180 [2,2',3,4,4',5,5'-heptachlorobiphenyl]
52663-68-0	PCB-187 [2,2',3,4',5,5',6-heptachlorobiphenyl]
52663-78-2	PCB-195 [2,2',3,3',4,4',5,6-octachlorobiphenyl]
40186-72-9	PCB-206 [2,2',3,3',4,4',5,5',6-nonachlorobiphenyl]
2051-24-3	PCB-209 [decachlorobiphenyl]
7012-37-5	PCB-28 [2,4,4'-trichlorobiphenyl]
41464-39-5	PCB-44 [2,2',3,5'-tetrachlorobiphenyl]
35693-99-3	PCB-52 [2,2',5,5'-tetrachlorobiphenyl]
32598-10-0	PCB-66 [2,3',4,4'-tetrachlorobiphenyl]
34883-43-7	PCB-8 [2,4'-dichlorobiphenyl]
106-47-8	p-Chloroaniline
95-69-2	p-Chloro-o-toluidine
120-71-8	p-Cresidine
106-44-5	p-Cresol
106-46-7	p-Dichlorobenzene (1,4-dichlorobenzene)
32534-81-9	Pentabromodiphenyl ether
82-68-8	Pentachloronitrobenzene (quintobenzene)
87-86-5	Pentachlorophenol
79-21-0	Peracetic acid
489	Perfluorinated compounds (PFCs)
1763-23-1	Perfluorooctanesulfonic acid (PFOS)
335-67-1	Perfluorooctanoic acid (PFOA)
198-55-0	Perylene
62-44-2	Phenacetin
85-01-8	Phenanthrene
94-78-0	Phenazopyridine
136-40-3	Phenazopyridine hydrochloride
3546-10-9	Phenesterin
50-06-6	Phenobarbital
108-95-2	Phenol
59-96-1	Phenoxybenzamine
63-92-3	Phenoxybenzamine hydrochloride
75-44-5	Phosgene
7803-51-2	Phosphine
7664-38-2	Phosphoric acid
504	Phosphorus and compounds
10025-87-3	Phosphorus oxychloride
10026-13-8	Phosphorus pentachloride
1314-56-3	Phosphorus pentoxide
7719-12-2	Phosphorus trichloride

12185-10-3	Phosphorus, white
518	Phthalates
85-44-9	Phthalic anhydride
156-10-5	p-Nitrosodiphenylamine
447	Polybrominated diphenyl ethers (PBDEs)
1336-36-3	Polychlorinated biphenyls (PCBs)
645	Polychlorinated biphenyls (PCBs) TEQ
646	Polychlorinated dibenzo-p-dioxins (PCDDs) & dibenzofurans (PCDF
432	Polycyclic aromatic hydrocarbon derivatives [PAH-Derivatives]
401	Polycyclic aromatic hydrocarbons (PAHs)
3564-09-8	Ponceau 3R
3761-53-3	Ponceau MX
7758-01-2	Potassium bromate
106-50-3	p-Phenylenediamine
671-16-9	Procarbazine
366-70-1	Procarbazine hydrochloride
123-38-6	Propionaldehyde
114-26-1	Propoxur (Baygon)
115-07-1	Propylene
6423-43-4	Propylene glycol dinitrate
107-98-2	Propylene glycol monomethyl ether
108-65-6	Propylene glycol monomethyl ether acetate
75-56-9	Propylene oxide
51-52-5	Propylthiouracil
106-42-3	p-Xylene
129-00-0	Pyrene
110-86-1	Pyridine
91-22-5	Quinoline
106-51-4	Quinone
571	Radon and its decay products
572	Refractory ceramic fibers
50-55-5	Reserpine
353	Rockwool
94-59-7	Safrole
78-92-2	sec-Butyl alcohol
7783-07-5	Selenide, hydrogen
7782-49-2	Selenium and compounds
7446-34-6	Selenium sulfide
7631-86-9	Silica, crystalline (respirable)
7440-22-4	Silver and compounds
354	Slagwool
1310-73-2	Sodium hydroxide
10048-13-2	Sterigmatocystin
18883-66-4	Streptozotocin
100-42-5	Styrene
96-09-3	Styrene oxide
95-06-7	Sulfallate
505-60-2	Sulfur mustard
7446-11-9	Sulfur trioxide
7664-93-9	Sulfuric acid
358	Talc containing asbestiform fibers
540-88-5	t-Butyl acetate
100-21-0	Terephthalic acid
75-65-0	tert-Butyl alcohol
40088-47-9	Tetrabromodiphenyl ether
127-18-4	Tetrachloroethene (perchloroethylene)
7440-28-0	Thallium and compounds
62-55-5	Thioacetamide
62-56-6	Thiourea
7550-45-0	Titanium tetrachloride
108-88-3	Toluene
26471-62-5	Toluene diisocyanates (2,4- and 2,6-)
584-84-9	Toluene-2,4-diisocyanate
91-08-7	Toluene-2,6-diisocyanate
38998-75-3	Total heptachlorodibenzofuran
37871-00-4	Total heptachlorodibenzo-p-dioxin
55684-94-1	Total hexachlorodibenzofuran
34465-46-8	Total hexachlorodibenzo-p-dioxin
30402-15-4	Total pentachlorodibenzofuran
36088-22-9	Total pentachlorodibenzo-p-dioxin
55722-27-5	Total tetrachlorodibenzofuran
41903-57-5	Total tetrachlorodibenzo-p-dioxin
8001-35-2	Toxaphene (polychlorinated camphenes)

156-60-5	trans-1,2-Dichloroethene
55738-54-0	trans-2[(Dimethylamino)-methylimino]-5-[2-(5-nitro-2-furyl)-vinyl]-1,3.
39765-80-5	trans-Nonachlor
126-73-8	Tributyl phosphate
79-01-6	Trichloroethene (TCE, trichloroethylene)
75-69-4	Trichlorofluoromethane (Freon 11)
78-40-0	Triethyl phosphate
121-44-8	Triethylamine
112-49-2	Triethylene glycol dimethyl ether
1582-09-8	Trifluralin
512-56-1	Trimethyl phosphate
78-30-8	Triorthocresyl phosphate
115-86-6	Triphenyl phosphate
101-02-0	Triphenyl phosphite
52-24-4	tris-(1-Aziridinyl)phosphine sulfide
126-72-7	tris(2,3-Dibromopropyl)phosphate
62450-06-0	Tryptophan-P-1
62450-07-1	Tryptophan-P-2
51-79-6	Urethane (ethyl carbamate)
7440-62-2	Vanadium (fume or dust)
1314-62-1	Vanadium pentoxide
108-05-4	Vinyl acetate
593-60-2	Vinyl bromide
75-01-4	Vinyl chloride
75-02-5	Vinyl fluoride
75-35-4	Vinylidene chloride
1330-20-7	Xylene (mixture), including m-xylene, o-xylene, p-xylene
7440-66-6	Zinc and compounds
1314-13-2	Zinc oxide

EXHIBIT 2

EXHIBIT 2

FINDINGS AND DETERMINATION OF RESPONDENT'S CIVIL PENALTY PURSUANT TO OREGON ADMINISTRATIVE RULE (OAR) 340-012-0045

VIOLATION: Failing to submit a timely and complete toxic air contaminant emissions inventory as required under OAR 340-245-0040(1) and 340-245-0040(3).

CLASSIFICATION: This is a Class II violation pursuant to OAR 340-012-0054(2)(i).

MAGNITUDE: The magnitude of the violation is moderate pursuant to OAR 340-012-0130(1), as there is no selected magnitude specified in OAR 340-012-0135 applicable to this violation, and the information reasonably available to DEQ does not indicate a minor or major magnitude.

CIVIL PENALTY FORMULA: The formula for determining the amount of penalty of each violation is: $BP + [(0.1 \times BP) \times (P + H + O + M + C)] + EB$

"BP" is the base penalty, which is $3,000 for a Class II, moderate magnitude violation in the matrix listed in OAR 340-012-0140(2)(b)(B)(ii) and applicable pursuant to OAR 340-012-0140(2)(a)(A) because Respondent violated an air quality rule and has a Title V permit.

"P" is whether Respondent has any prior significant actions, as defined in OAR 340-012-0030(19), in the same media as the violation at issue that occurred at a facility owned or operated by the same Respondent, and receives a value of 0 according to OAR 340-012-0145(2)(a)(A), because there are no prior significant actions.

"H" is Respondent's history of correcting prior significant actions, and receives a value of 0 according to OAR 340-012-0145(3)(c) because there is no prior history.

"O" is whether the violation was repeated or ongoing, and receives a value of 4 according to OAR 340-012-0145(4)(d) because there were more than 28 occurrences of the violation. Each day of violation is a separate occurrence. From at least August 11, 2020 through to the date of the MAO, Respondent has failed to submit a complete EI. This amounts to over 28 occurrences.

"M" is the mental state of the Respondent, and receives a value of 8 according to OAR 340-012-0145(5)(d) because Respondent acted or failed to act intentionally with actual knowledge of the requirement. "Intentional" means the respondent acted with a conscious objective to cause the result of the conduct. On August 8, 2019, October 8, 2019, and July 10, 2020, DEQ requested in writing that Respondent revise its emission inventory to include TCE emissions from battery separator off-gassing at the Facility warehouse. On October 8, 2019 and July 10, 2020, DEQ notified Respondent that a failure to include the TCE emissions was a violation of OAR 340-245-0040(1) and (3). Despite DEQ's repeated

requests and its explanation for the bases of those requests, Respondent refused to modify its EI to include those emissions. Accordingly, Respondent failed to act intentionally with actual knowledge of the requirement to list the TCE emissions from battery separator off-gassing.

"C" is Respondent's efforts to correct or mitigate the violation, and receives a value of -2 according to OAR 340-012-0145(6)(d) because Respondent eventually made some efforts to correct the violation. Despite DEQ's repeated requests prior to the date of the Notice, Respondent did not correct its EI. However, Respondent has agreed in the MAO to include TCE emissions from battery separator off-gassing at the Facility warehouse in the Stipulated EI.

"EB" is the approximate dollar value of the benefit gained and the costs avoided or delayed as a result of the Respondent's noncompliance. It is designed to "level the playing field" by taking away any economic advantage the entity gained and to deter potential violators from deciding it is cheaper to violate and pay the penalty than to pay the costs of compliance. In this case, "EB" receives a value of $0 pursuant to OAR 340-012-0150(4) as there is insufficient information on which to make an estimate at this time.

PENALTY CALCULATION: Penalty = BP + [(0.1 x BP) x (P + H + O + M + C)] + EB
= $3,000 + [(0.1 x $3,000) x (0 + 0 + 4 + 8 + -2)] + $0
= $3,000 + ($300 x 10) + $0
= $3,000 + $3,000 + $0
= $6,000