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Air Permit to Construct - New

version 1.1

(Submission #: HPN-RZGG-3WWTQ, version 1)

Details

Submission ID HPN-RZGG-3WWTQ

Status In Process

Fees

Default Fee \$325.00

Payments/Adjustments (\$325.00)

Balance Due \$0.00 (Paid)

Form Input

Form Instructions

Section A - Applicant Information

Applicant

First Name **Last Name**

Nick *McMillan*

Title

NONE PROVIDED

Phone Type **Number** **Extension**

Mobile 7016129722

Email

nick.mcmillan@cnhind.com

Section B - Source Information

Permit Application for Air Contaminant Sources

Follow link to complete form SFN 8516 and upload below.

[Link to SFN 8516 - Permit Application for Air Contaminant Sources](#)

Upload form SFN 8516

[SFN8516 Certified.pdf - 05/22/2023 08:22 AM](#)

Comment

NONE PROVIDED

Section C - Source Location

Facility Name

CNH Industrial America LLC - Fargo Facility

Facility Location:

46.8798123,-96.83326009999999

Section D - File Upload

Please also remember to upload all additional documents necessary to meet Steps 1-5 of the Form Instructions Section.

Additional Forms

NONE PROVIDED

Attachments

[CNH Fargo PTE Calculations.xlsx - 05/22/2023 08:23 AM](#)

[Executive Summary.pdf - 05/22/2023 08:23 AM](#)

Comment

Executive Summary with Limit Discussion & PTE Calculations

Attachments

Date	Attachment Name	Context	User
5/22/2023 8:23 AM	Executive Summary.pdf	Attachment	Kristopher Luneau
5/22/2023 8:23 AM	CNH Fargo PTE Calculations.xlsx	Attachment	Kristopher Luneau
5/22/2023 8:22 AM	SFN8516 Certified.pdf	Attachment	Kristopher Luneau

Status History

	User	Processing Status
10/28/2022 10:50:24 AM	Kristopher Luneau	Draft
5/22/2023 8:26:17 AM	Kristopher Luneau	Submitting
5/22/2023 8:26:32 AM	Kristopher Luneau	Submitted
5/22/2023 8:26:42 AM	Kristopher Luneau	In Process

Executive Summary
Permit to Construct – Synthetic Minor Permit Application
CNH Industrial America LLC
Fargo, North Dakota

CNH Industrial America LLC (CNH) in Fargo, North Dakota, holds a Title V Operating Permit, Permit No. T5-M94002 which expired on January 10, 2023. CNH submitted a Title V Operating Permit Application on July 6, 2022, and the permit extends until a new permit is issued. In talks with Kari Thorsteinson of the NDEQ, CNH's emissions would qualify for a Synthetic Minor Permit Application. To update the permit, CNH must submit a Permit to Construct (PTC) Application to change the facility from a Title V Air Permit source to a Synthetic Minor Air Permit source, in accordance with the requirements in NDAC Rules 33.1-15-14.

CNH operates a prime booth, a large parts paint booth, and three final parts paint booths. Paint guns in the prime booth and large parts booth are fed by lines running from two paint kitchens. Potential emissions from these booths assume all of the spray guns are operating 24 hours per day. The final parts paint booths are used for touch-up purposes. The paint guns utilized in these booths do not have paint lines running to them. The guns utilize a 22 oz cup to hold the paint. The cup must be cleaned out following each touch-up job. In addition, CNH operates various natural gas fired combustion equipment and a small natural gas fired emergency generator.

The painting operations have a high potential to emit for Volatile Organic Compounds (VOCs), Particulate Matter (PM/PM10/PM2.5) and Hazardous Air Pollutants (HAPs). The actual emissions for these pollutants are much lower than the potential emissions. To obtain a Synthetic Minor air permit, CNH is requesting the following permit limits in order to stay under major source permitting thresholds:

- VOC – 95 tons/year.
- PM/PM10/PM2.5 – 95 tons/year.
- Individual HAP – 9 tons/year.
- Combined HAPs – 24 tons per year.

It should be noted that the potential emissions from the other regulated pollutants are under permit thresholds. To ensure compliance with the permit limits, CNH is proposing to conduct emission calculations for VOCs, PM/PM10/PM2.5, Individual HAP, and Combined HAPs on a monthly basis. The calculations will include monthly emissions from permitted sources as well as 12-month rolling sum calculations to ensure compliance with the permit limits.

CNH is not adding any additional emission units as part of the permit change. CNH is requesting the Synthetic Minor Permit incorporate all existing sources that emit criteria pollutants, VOCs, and HAPs at the site, including the prime paint booth (EU38-A) and burner (EU38-B); the large parts paint booth (EU19-A), burner (EU19-B), and bake oven burners (EU20-A, EU20-B2, & EU20-B3); the three final paint booths (EU13-B, EU4-B, & EU45); the natural gas-fired boilers (EU41 & EU42); the natural gas-fired emergency backup generator (EU46); and the Burn-Off Oven (EU47).

CNH submitted a PTC application on February 18, 2020, to replace the existing Burn-Off Oven (EU 16 - Armature Coil Equipment Incinerator) with a new Burn-Off Oven (EU 47 – Ace Equipment Company 3512-RT). CNH received approval for the replacement on

Executive Summary
Permit to Construct – Synthetic Minor Permit Application
CNH Industrial America LLC
Fargo, North Dakota

March 19, 2020. The letter stated that the permit would be officially updated with this change during the next modification or renewal of the permit.

Potential-to-Emit Emission Calculations for these existing sources are included in Attachment B.

The additional documents included with this Synthetic Minor Permit application are as follows:

1. Permit to Construct Application for Air Contaminant Sources - Form SFN8516
2. Potential-to-Emit Emission Calculations Spreadsheet



PERMIT APPLICATION FOR AIR CONTAMINANT SOURCES
 NORTH DAKOTA DEPARTMENT OF ENVIRONMENTAL QUALITY
 DIVISION OF AIR QUALITY
 SFN 8516 (9-2021)

SECTION A - FACILITY INFORMATION

Name of Firm or Organization CNH Industrial America LLC				
Applicant's Name Jason Hausauer				
Title Plant Manager		Telephone Number (701) 219-0128	E-mail Address jason.hausauer@cnhind.com	
Contact Person for Air Pollution Matters Nick McMillan				
Title Facilities/Security Manager		Telephone Number (701) 612-9722	E-mail Address nick.mcmillan@cnhind.com	
Mailing Address (Street & No.) 3401 1st Avenue North				
City Fargo		State ND	ZIP Code 58108	
Facility Name CNH Industrial America LLC, Fargo Facility				
Facility Address (Street & No.) 3401 1st Avenue North				
City Fargo		State ND	ZIP Code 58108	
County Cass	Coordinates NAD 83 in Decimal Degrees (to forth decimal degree)			
Latitude 46.87847300		Longitude -96.83359700		
Legal Description of Facility Site				
Quarter SW	Quarter SW	Section 2	Township 139N	Range 49W
Land Area at Facility Site 49.5 Acres (or) 2155711.5 Sq. Ft.		MSL Elevation at Facility 895		

SECTION B - GENERAL NATURE OF BUSINESS

Describe Nature of Business	North American Industry Classification System Number	Standard Industrial Classification Number (SIC)
Manufacturing Tractors, loaders, and cabs	333111-Farm Machinery and Equipment Manufacturing	3523-Farm Machinery and Equipment

SECTION C - GENERAL PERMIT INFORMATION

Type of Permit? <input type="checkbox"/> Permit to Construct (PTC) <input checked="" type="checkbox"/> Permit to Operate (PTO)	
If application is for a Permit to Construct, please provide the following data:	
Planned Start Construction Date	Planned End Construction Date

SECTION D – SOURCE IDENTIFICATION AND CATEGORY OF EACH SOURCE INCLUDED ON THIS PERMIT APPLICATION

Your Source ID Number	Source or Unit (Equipment, Machines, Devices, Boilers, Processes, Incinerators, Etc.)	Permit to Construct				Minor Source Permit to Operate						
		New Source	Existing Source Modification	Existing Source Expansion	Existing Source Change of Location	New Source	Existing Source Initial Application	Existing Source After Modification	Existing Source After Expansion	Existing Source After Change of Location	Existing Source After Change of Ownership	Other
EU38-A/EU38-B	Koch Prime Paint Booth and Burner	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EU19-A/EU19-B	Haden Large Parts Paint Booth and Burner	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EU13-B/EU14-B/EU45	Final Paint Booth #1 - 3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EU20-A/B2/B3	Haden LPP Booth Bake Ovens	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EU41	Koch Natural Gas-fired Boiler #1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EU42	Koch Natural Gas-fired Boiler #2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EU46	Natural Gas-fired Emergency Generator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EU47	Burn-off Oven	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Add additional pages if necessary

SECTION D2 – APPLICABLE REGULATIONS

Source ID No.	Applicable Regulations (NSPS/MACT/NESHAP/etc.)
Facility-wide	40 CFR Part 60, Subpart A; 40 CFR Part 61, Subpart A, North Dakota Administrative Code 33.1-15-14

SECTION E – TOTAL POTENTIAL EMISSIONS

Pollutant	Amount (Tons Per Year)
NO _x	38.22
CO	31.81
PM	95

Pollutant	Amount (Tons Per Year)
PM ₁₀ (filterable and condensable)	95
PM _{2.5} (filterable and condensable)	95
SO ₂	0.227
VOC	95
GHG (as CO ₂ e)	45,637.33
Largest Single HAP	9
Total HAPS	24

*If performance test results are available for the unit, submit a copy of test with this application. If manufacturer guarantee is used provide spec sheet.

SECTION F1 – ADDITIONAL FORMS

Indicate which of the following forms are attached and made part of the application	
<input type="checkbox"/> Air Pollution Control Equipment (SFN 8532)	<input type="checkbox"/> Fuel Burning Equipment Used for Indirect Heating (SFN 8518)
<input type="checkbox"/> Construct/Operate Incinerators (SFN 8522)	<input type="checkbox"/> Hazardous Air Pollutant (HAP) Sources (SFN 8329)
<input type="checkbox"/> Natural Gas Processing Plants (SFN 11408)	<input type="checkbox"/> Manufacturing or Processing Equipment (SFN 8520)
<input type="checkbox"/> Glycol Dehydration Units (SFN 58923)	<input type="checkbox"/> Volatile Organic Compounds Storage Tank (SFN 8535)
<input type="checkbox"/> Flares (SFN 59652)	<input type="checkbox"/> Internal Combustion Engines and Turbines (SFN 8891)
<input type="checkbox"/> Grain, Feed, and Fertilizer Operations (SFN 8524)	<input type="checkbox"/> Oil/Gas Production Facility Registration (SFN 14334)

SECTION F2 – OTHER ATTACHMENTS INCLUDED AS PART OF THIS APPLICATION

1.	Executive Summary	4.	
2.	Potential to Emit Calculations	5.	
3.		6.	

I, the undersigned applicant, am fully aware that statements made in this application and the attached exhibits and statements constitute the application for Permit(s) to Construct and/or Operate Air Contaminant sources from the North Dakota Department of Environmental Quality and certify that the information in this application is true, correct and complete to the best of my knowledge and belief. Further, I agree to comply with the provisions of Chapter 23.1-06 of the North Dakota Century Code and all rules and regulations of the Department, or revisions thereof. I also understand the permit is nontransferable and, if granted a permit, I will promptly notify the Department upon sale or legal transfer of this permitted establishment.

Signature <i>Jason Hausauer</i>	Date <i>18 May 2023</i>
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INSTRUCTIONS

SITE PLANS TO BE ATTACHED TO APPLICATION:

Prepare and attach a plot plan drawn to scale or properly dimensioned, showing at least the following:

- a. The property involved and the outlines and heights of all buildings on the property. Identify property lines plainly. Also, indicate if there is a fence around the property that prevents public access.
- b. Location and identification of all existing or proposed equipment, manufacturing processes, etc., and points of emission or discharge of air contaminants to the atmosphere.
- c. Location of the facility or property with respect to the surrounding area, including residences, businesses and other permanent structures, streets and roadways. Identify all such structures and roadways. Indicate direction (**NORTH**) on the drawing and the prevailing wind direction.

EQUIPMENT PLANS AND SPECIFICATIONS FOR PERMIT TO CONSTRUCT:

Supply plans and specifications, including as a minimum an assembly drawing, dimensioned and to scale, in plan, elevation and as many sections as are needed to show clearly the design and operation of the equipment and the means by which air contaminants are controlled.

The following must be shown:

- a. Size and shape of the equipment. Show exterior and interior dimensions and features.
- b. Locations, sizes, and shape details of all features which may affect the production, collection, conveying, or control of air contaminants of any kind, location, size, and shape details concerning all material handling equipment.
- c. All data and calculations used in selecting or designing the equipment.
- d. Horsepower rating of all internal combustion engines driving the equipment.

NOTE: STRUCTURAL DESIGN CALCULATIONS AND DETAILS ARE NOT REQUIRED. WHEN STANDARD COMMERCIAL EQUIPMENT IS TO BE INSTALLED, THE MANUFACTURER'S CATALOG DESCRIBING THE EQUIPMENT MAY BE SUBMITTED IN LIEU OF ITEMS a, b, c, and d OF ABOVE, WHICH THE CATALOG COVERS. ALL INFORMATION REQUIRED ABOVE THAT THE CATALOG DOES NOT CONTAIN MUST BE SUBMITTED BY THE APPLICANT.

ADDITIONAL INFORMATION MAY BE REQUIRED:

If the application is signed by an authorized representative of the owner, a LETTER OF AUTHORIZATION must be attached to the application.

SEND COMPLETED APPLICATION AND ALL ATTACHMENTS TO:

North Dakota Department of Environmental Quality
Division of Air Quality
4201 Normandy Street, 2nd Floor
Bismarck, ND 58503-1324
(701) 328-5188

**CNH Industrial America LLC
Fargo, ND**

Summary of Facility PTE Emissions

Item	Process Type	Criteria Pollutants						
		PM		PM ₁₀		PM _{2.5}		VOC
		Uncontrolled tons/year	Controlled tons/year	Uncontrolled tons/year	Controlled tons/year	Uncontrolled tons/year	Controlled tons/year	Uncontrolled tons/year
EU38-A	Koch Prime Booth	1,915.08	19.45	1,945.35	19.45	1,945.35	19.45	2,080.45
EU19-A	Haden Large Parts Booth	2941.30	95.06	2941.30	95.06	2941.30	95.06	4,441.27
EU13-B	Final Paint Booths 1	5.07	0.05	5.07	0.05	5.07	0.05	12.62
EU14-B	Final Paint Booths 2	5.07	0.05	5.07	0.05	5.07	0.05	12.62
EU45	Final Paint Booths 3	3.91	0.04	3.91	0.04	3.91	0.04	6.31
Spray Booth PTE Emission Totals:		4,870.42	114.65	4,900.69	114.65	4,900.69	114.65	6,553.32
Proposed Synthetic Minor Permit Limits:		NA	95	NA	95	NA	95	95

Item	Process Type	Criteria Pollutants						
		PM	PM ₁₀	PM _{2.5}	VOC	SO _x	NO _x	CO
		Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year
Various	Natural Gas-fired Combustion Equipment	2.87	2.87	2.87	2.08	0.227	37.79	31.75
EU46	Natural Gas-fired Emergency Generator*	0.0010	0.0000	0.0000	0.0000	0.0001	0.4253	0.0581
Combustion PTE Emission Totals:		2.87	2.87	2.87	2.08	0.227	38.22	31.81

Facility-wide PTE Emission Totals:	4,873.29	4,903.57	4,903.57	6,555.40	0.227	38.22	31.81
Proposed Synthetic Minor Permit Limits	95	95	95	95	NA	NA	NA

Notes:

Controlled emissions includes capture and control efficiencies for 2 - 3 stage dry filter collection equipment.

*Total HAPs emissions for the Natural Gas-fired Emergency Generator are combined in tons/year

All uncontrolled emission calculations are based on paint booths and combustion equipment running 8,760 hours per year (24 hours per day, 7 days per week).

Proposed Synthetic Minor Permit Limits
Pinnacle Engineering, Inc.
7389 Airport View Dr. SW
Rochester, MN 55902

Crenlo Cab Products, Inc. Plant 2
Permit Reissuance Update
3/27/2024

CNH Industrial America LLC
Fargo, ND

Summary of Facility PTE Emissions

Item	Process Type	Hazardous Air Pollutants (HAPs)					
		Combined HAPs	Cumene CAS # 98-82-8	Ethylbenzene CAS # 100-41-4	Methacrylate CAS # 80-62-6	Naphthalene CAS # 91-20-3	Phenol CAS # 108-95-2
		Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year
EU38-A	Koch Prime Booth	126.41	0.00	21.71	0.00	---	3.37
EU19-A	Haden Large Parts Booth	157.73	0.00	20.05	0.00	15.16	0.00
EU13-B	Final Paint Booths 1	0.95	0.01	0.03	0.02	0.00	0.00
EU14-B	Final Paint Booths 2	0.95	0.01	0.03	0.02	0.00	0.00
EU45	Final Paint Booths 3	0.48	0.01	0.01	0.01	0.00	0.00
Spray Booth PTE Emission Totals:		286.51	0.03	41.83	0.06	15.16	3.37
Proposed Synthetic Minor Permit Limits:		24	Individual HAP Limit = 9				

Item	Process Type	Greenhouse Gases (GHGs)					Ammonia
		Lead	N ₂ O	CO ₂	CH ₄	CO ₂ e	Ammonia
		Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year
Various	Natural Gas-fired Combustion Equipment	1.89E-04	8.31E-01	45,353.10	8.69E-01	45,622.61	1.1749
EU46	Natural Gas-fired Emergency Generator*	---	---	11.466444	0.1303005	14.72	---
Combustion PTE Emission Totals:		0.00019	0.8315	45,364.56	0.9996	45,637.33	1.1749

Facility-wide PTE Emission Totals:	0.00019	0.8315	45,364.56	0.9996	45,637.33	1.1749
Proposed Synthetic Minor Permit Limits	9	NA	NA	NA	NA	NA

Notes:

Controlled emissions includes capture and control efficiencies for 2

*Total HAPs emissions for the Natural Gas-fired Emergency Gener

All uncontrolled emission calculations are based on paint booths an

Proposed Synthetic Minor Permit Limits
Pinnacle Engineering, Inc.

7389 Airport View Dr. SW

Rochester, MN 55902

Crenlo Cab Products, Inc. Plant 2

Permit Reissuance Update

3/27/2024

**CNH Industrial America LLC
Fargo, ND**

Summary of Facility PTE Emissions

Item	Process Type	Toluene CAS # 108-88-3	Xylene CAS # 1330-20-7
		Uncontrolled tons/year	Uncontrolled tons/year
EU38-A	Koch Prime Booth	0.00	101.33
EU19-A	Haden Large Parts Booth	42.32	80.20
EU13-B	Final Paint Booths 1	0.03	0.85
EU14-B	Final Paint Booths 2	0.03	0.85
EU45	Final Paint Booths 3	0.02	0.43
Spray Booth PTE Emission Totals:		42.41	183.66
Proposed Synthetic Minor Permit Limits:			

Item	Process Type	Combined HAPs*	Arsenic
		Uncontrolled tons/year	Uncontrolled tons/year
Various	Natural Gas-fired Combustion Equipment	7.14E-01	7.56E-05
EU46	Natural Gas-fired Emergency Generator*	0.0075	---
Combustion PTE Emission Totals:		0.7213	7.56E-05

Facility-wide PTE Emission Totals:	287.2352	7.56E-05
Proposed Synthetic Minor Permit Limits	24	

Notes:

Controlled emissions includes capture and control efficiencies for 2

*Total HAPs emissions for the Natural Gas-fired Emergency Gener

All uncontrolled emission calculations are based on paint booths an

Proposed Synthetic Minor Permit Limits
Pinnacle Engineering, Inc.

7389 Airport View Dr. SW

Rochester, MN 55902

**CNH Industrial America LLC
Fargo, ND**

Summary of Facility PTE Emissions

Item	Process Type
EU38-A	Koch Prime Booth
EU19-A	Haden Large Parts Booth
EU13-B	Final Paint Booths 1
EU14-B	Final Paint Booths 2
EU45	Final Paint Booths 3
Spray Booth PTE Emission Totals:	
Proposed Synthetic Minor Permit Limits:	

Item	Process Type	Benzene	Dichlorobenzen	Beryllium	Cadmium	Chromium	Cobalt	Formaldehyde	Hexane
		Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year
Various	Natural Gas-fired Combustion Equipment	7.94E-04	4.54E-04	4.54E-06	4.16E-04	5.29E-04	3.17E-05	2.83E-02	6.80E-01
EU46	Natural Gas-fired Emergency Generator*	4.59E-05	---	---	---	---	---	5.50E-03	1.16E-04
Combustion PTE Emission Totals:		8.40E-04	4.54E-04	4.54E-06	4.16E-04	5.29E-04	3.17E-05	3.38E-02	6.80E-01

Facility-wide PTE Emission Totals:	8.40E-04	4.54E-04	4.54E-06	4.16E-04	5.29E-04	3.17E-05	3.38E-02	6.80E-01
Proposed Synthetic Minor Permit Limits								

Notes:

Controlled emissions includes capture and control efficiencies for 2

*Total HAPs emissions for the Natural Gas-fired Emergency Gener

All uncontrolled emission calculations are based on paint booths an

Proposed Synthetic Minor Permit Limits
Pinnacle Engineering, Inc.

7389 Airport View Dr. SW

Rochester, MN 55902

Crenlo Cab Products, Inc. Plant 2

Permit Reissuance Update

3/27/2024

**CNH Industrial America LLC
Fargo, ND**

Summary of Facility PTE Emissions

Item	Process Type
EU38-A	Koch Prime Booth
EU19-A	Haden Large Parts Booth
EU13-B	Final Paint Booths 1
EU14-B	Final Paint Booths 2
EU45	Final Paint Booths 3
Spray Booth PTE Emission Totals:	
Proposed Synthetic Minor Permit Limits:	

Item	Process Type	Manganese Uncontrolled tons/year
Various	Natural Gas-fired Combustion Equipment	1.44E-04
EU46	Natural Gas-fired Emergency Generator*	---
Combustion PTE Emission Totals:		1.44E-04

Facility-wide PTE Emission Totals:	1.44E-04
Proposed Synthetic Minor Permit Limits	

Notes:

Controlled emissions includes capture and control efficiencies for 2

*Total HAPs emissions for the Natural Gas-fired Emergency Gener

All uncontrolled emission calculations are based on paint booths an

Proposed Synthetic Minor Permit Limits
Pinnacle Engineering, Inc.

7389 Airport View Dr. SW
Rochester, MN 55902

**CNH Industrial America LLC
Fargo, ND**

Summary of Facility PTE Emissions

Item	Process Type
EU38-A	Koch Prime Booth
EU19-A	Haden Large Parts Booth
EU13-B	Final Paint Booths 1
EU14-B	Final Paint Booths 2
EU45	Final Paint Booths 3
Spray Booth PTE Emission Totals:	
Proposed Synthetic Minor Permit Limits:	

Item	Process Type	Hazardous Air Pollutants (HAPs)							
		Mercury	Naphthalene	Nickel	Selenium	Toluene	POM	1,1,2,2-Tetrachloroethane	1,1,2-Trichloroethane
		Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year
Various	Natural Gas-fired Combustion Equipment	9.83E-05	2.31E-04	7.94E-04	9.07E-06	1.29E-03	3.23E-05	---	---
EU46	Natural Gas-fired Emergency Generator*	---	7.76E-06	---	---	4.25E-05	6.28E-06	4.17E-06	3.31E-06
Combustion PTE Emission Totals:		9.83E-05	2.38E-04	7.94E-04	9.07E-06	1.33E-03	3.86E-05	4.17E-06	3.31E-06

Facility-wide PTE Emission Totals:	9.83E-05	15.16	7.94E-04	9.07E-06	42.41	3.86E-05	4.17E-06	3.31E-06
Proposed Synthetic Minor Permit Limits								Individual HAP Limit = 9

Notes:

Controlled emissions includes capture and control efficiencies for 2

*Total HAPs emissions for the Natural Gas-fired Emergency Gener

All uncontrolled emission calculations are based on paint booths an

Proposed Synthetic Minor Permit Limits
Pinnacle Engineering, Inc.

7389 Airport View Dr. SW
Rochester, MN 55902

Crenlo Cab Products, Inc. Plant 2
Permit Reissuance Update

3/27/2024

**CNH Industrial America LLC
Fargo, ND**

Summary of Facility PTE Emissions

Item	Process Type
EU38-A	Koch Prime Booth
EU19-A	Haden Large Parts Booth
EU13-B	Final Paint Booths 1
EU14-B	Final Paint Booths 2
EU45	Final Paint Booths 3
Spray Booth PTE Emission Totals:	
Proposed Synthetic Minor Permit Limits:	

Item	Process Type	1,3-Butadiene	1,3-Dichloropropane	2,2,4-Trimethylpentane	Acetaldehyde	Acrolein	Biphenyl	Carbon Tetrachloride	Chlorobenzene	Chloroform
		Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year
Various	Natural Gas-fired Combustion Equipment	---	---	---	---	---	---	---	---	---
EU46	Natural Gas-fired Emergency Generator*	2.78E-05	2.75E-06	2.61E-05	8.71E-04	5.36E-04	2.21E-05	3.83E-06	3.17E-06	2.97E-06
Combustion PTE Emission Totals:		2.78E-05	2.75E-06	2.61E-05	8.71E-04	5.36E-04	2.21E-05	3.83E-06	3.17E-06	2.97E-06

Facility-wide PTE Emission Totals:	2.78E-05	2.75E-06	2.61E-05	8.71E-04	5.36E-04	2.21E-05	3.83E-06	3.17E-06	2.97E-06
Proposed Synthetic Minor Permit Limits									

Notes:

Controlled emissions includes capture and control efficiencies for 2

*Total HAPs emissions for the Natural Gas-fired Emergency Gener

All uncontrolled emission calculations are based on paint booths an

Proposed Synthetic Minor Permit Limits
Pinnacle Engineering, Inc.

7389 Airport View Dr. SW

Rochester, MN 55902

Crenlo Cab Products, Inc. Plant 2

Permit Reissuance Update

3/27/2024

CNH Industrial America LLC
Fargo, ND

Summary of Facility PTE Emissions

Item	Process Type
EU38-A	Koch Prime Booth
EU19-A	Haden Large Parts Booth
EU13-B	Final Paint Booths 1
EU14-B	Final Paint Booths 2
EU45	Final Paint Booths 3
Spray Booth PTE Emission Totals:	
Proposed Synthetic Minor Permit Limits:	

Item	Process Type	Ethylbenzene	Ethylene Dibromide	Methanol	Methylene Chloride	PAH	Phenol	Styrene	Tetrachloroethane	Vinyl Chloride	Xylenes
		Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year	Uncontrolled tons/year
Various	Natural Gas-fired Combustion Equipment	---	---	---	---	---	---	---	---	---	---
EU46	Natural Gas-fired Emergency Generator*	4.14E-06	4.62E-06	2.61E-04	2.08E-06	2.80E-06	2.50E-06	2.46E-06	2.59E-07	1.55E-06	1.92E-05
Combustion PTE Emission Totals:		4.14E-06	4.62E-06	2.61E-04	2.08E-06	2.80E-06	2.50E-06	2.46E-06	2.59E-07	1.55E-06	1.92E-05

Facility-wide PTE Emission Totals:	41.83	4.62E-06	2.61E-04	2.08E-06	2.80E-06	3.37	2.46E-06	2.59E-07	1.55E-06	183.66
Proposed Synthetic Minor Permit Limits										

Notes:

Controlled emissions includes capture and control efficiencies for 2

*Total HAPs emissions for the Natural Gas-fired Emergency Gener

All uncontrolled emission calculations are based on paint booths an

Proposed Synthetic Minor Permit Limits
Pinnacle Engineering, Inc.

7389 Airport View Dr. SW

Rochester, MN 55902

Crenlo Cab Products, Inc. Plant 2

Permit Reissuance Update

3/27/2024

**CNH Industrial America LLC
Fargo, ND**

Koch Prime Booth Spray Gun PTE (EU38-A)

EU#	Material Number	Application Method	Maximum Application Rate Per Gun (gal/hr)	Spray Ports	Maximum Application Rates (gal/hr)	Maximum Application Rates (gal/hr)	Particulates (PM, PM ₁₀ , PM _{2.5})		
							Max Solids Content lb/gal	Uncontrolled PTE (lb/hr)	Uncontrolled PTE (tons/year)
EU38-A	Koch Prime Booth - Coating	Electrostatic/Air Atomization	45	3	135.00	132.30	9.44	437.23	1915.08
EU38-A	Koch Prime Booth - Catalyst					2.7	7.32	6.91	30.28
Koch Prime Booth PTE Emission TOTALS:									1,945.35

Notes

1. Particulate PTE assumes PM=PM₁₀=PM_{2.5}
2. Transfer Efficiency = 65%
3. Capture Efficiency = 100%
4. Control Efficiency = 99%
5. Coating to Catalyst Ratio is 98% Coating, 2% Catalyst
6. The paint booth guns are fed via lines from a paint kitchen. PTEs assume all three guns are operating at maximum capacity for 8,760 hrs/yr.

Koch Prime Booth Solvent PTE (EU38-A)

Solvent	2022 Annual Usage (gals/yr)	Density	2022 Annual Usage (lbs/yr)	Ratio Potential Coating / Actual Coating	Potential Usage (lbs/yr)	VOC (%)	Potential VOC Emissions (lbs/hr)	Potential VOC Emissions (lbs/yr)	Potential VOC Emissions (tons/yr)
IPA	45.13	6.59	297.37	123.69	36,781	100%	4.20	36,781	18.39
Methyl n-Amyl Ketone	357.50	6.76	2,417		298,912	100%	34.12	298,912	149.46
Parcosol 283	755.61	6.59	4,980		615,894	35%	24.61	215,563	107.78
TOTALS			7,694		951,586		62.93	551,255	275.63

1. In addition to the spray gun coatings used above, CNH utilizes solvents in the painting operations.
2. Potential emissions were determined by taking the actual solvent usage and multiplying by potential coating usage (135 gal/hr x 8760) vs actual coating usage (9,561.3 gal/yr).
3. Total operating time for the three booths in 2022 was 7,665 hours per the note below:
 - a. Prime Booth operating hours are 21 hours per day x 365 days per year = 7,665.

**CNH Industrial America LLC
Fargo, ND**

Koch Prime Booth Spray Gun PTE (EU38-

EU#	Material Number	PM10, PM2.5		Volatile Organic Compounds (VOCs)			Ethylbenzene CAS # 100-41-3	
		Controlled PTE (lb/hr)	PM/PM10/PM2.5 Controlled PTE (tons/year)	Max VOC Content lb/gal	Uncontrolled PTE (lb/hr)	Uncontrolled VOC PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)
EU38-A	Koch Prime Booth - Coating	4.37	19.15	3.07	406.16	1778.99	0.04	4.96
EU38-A	Koch Prime Booth - Catalyst	0.07	0.30	2.19	5.90	25.84	0.00	0.00
			19.45			1,804.82		

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency =
3. Capture Efficiency =
4. Control Efficiency =
5. Coating to Catalyst Ratio is 98% Coating, 2% Catalyst
6. The paint booth guns are fed via lines from a paint kitel

Koch Prime Booth Solvent PTE (EU38-A)

Solvent	2022 Annual Usage (gals/yr)
IPA	45.13
Methyl n-Amyl Ketone	357.50
Parcosol 283	755.61
TOTALS	

1. In addition to the spray gun coatings used above, CNH
2. Potential emissions were determined by taking the actu
3. Total operating time for the three booths in 2022 was 7
 - a. Prime Booth operating hours are 21 hours per day x

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Koch Prime Booth Spray Gun PTE (EU38-

EU#	Material Number	Uncontrolled PTE (ton/yr)
EU38-A	Koch Prime Booth - Coating	21.71
EU38-A	Koch Prime Booth - Catalyst	0.00
		21.71

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency =
3. Capture Efficiency =
4. Control Efficiency =
5. Coating to Catalyst Ratio is 98% Coating, 2% Catalyst
6. The paint booth guns are fed via lines from a paint kitel

Koch Prime Booth Solvent PTE (EU38-A)

Solvent	2022 Annual Usage (gals/yr)
IPA	45.13
Methyl n-Amyl Ketone	357.50
Parcosol 283	755.61
TOTALS	

1. In addition to the spray gun coatings used above, CNH
2. Potential emissions were determined by taking the actu
3. Total operating time for the three booths in 2022 was 7
 - a. Prime Booth operating hours are 21 hours per day x

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Koch Prime Booth Spray Gun PTE (EU38-

EU#	Material Number	Methyl Methacrylate CAS # 80-62-6			Phenol CAS # 108-95-2		
		Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)
EU38-A	Koch Prime Booth - Coating	0.00	0.00	0.00	0.00	0.00	0.00
EU38-A	Koch Prime Booth - Catalyst	0.00	0.00	0.00	0.29	0.77	3.37
				0.00			
						3.37	

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency =
3. Capture Efficiency =
4. Control Efficiency =
5. Coating to Catalyst Ratio is 98% Coating, 2% Catalyst
6. The paint booth guns are fed via lines from a paint kitel

Koch Prime Booth Solvent PTE (EU38-A)

Solvent	2022 Annual Usage (gals/yr)
IPA	45.13
Methyl n-Amyl Ketone	357.50
Parcosol 283	755.61
TOTALS	

1. In addition to the spray gun coatings used above, CNH
2. Potential emissions were determined by taking the actu
3. Total operating time for the three booths in 2022 was 7
 - a. Prime Booth operating hours are 21 hours per day x

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Koch Prime Booth Spray Gun PTE (EU38-

EU#	Material Number	Toluene CAS # 108-88-3			Xylene CAS # 1330-20-7			Cumene CAS # 98-82-8		
		Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)
EU38-A	Koch Prime Booth - Coating	0.00	0.00	0.00	0.17	23.13	101.33	0.00	0.00	0.00
EU38-A	Koch Prime Booth - Catalyst	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00				101.33		

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency =
3. Capture Efficiency =
4. Control Efficiency =
5. Coating to Catalyst Ratio is 98% Coating, 2% Catalyst
6. The paint booth guns are fed via lines from a paint kitel

Koch Prime Booth Solvent PTE (EU38-A)

Solvent	2022 Annual Usage (gals/yr)
IPA	45.13
Methyl n-Amyl Ketone	357.50
Parcosol 283	755.61
TOTALS	

1. In addition to the spray gun coatings used above, CNH
2. Potential emissions were determined by taking the actu
3. Total operating time for the three booths in 2022 was 7
 - a. Prime Booth operating hours are 21 hours per day x

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Haden Large Parts Paint Booth Spray Gun PTE (EU19-A)

EU#	Material Number	Application Method	Maximum Application Rate per Gun (gal/hr)	Spray Ports	Maximum Application Rates (gal/hr)	Maximum Application Rates (gal/hr)	Partic	
							Max Solids Content lb/gal	Uncontrolled PTE (lb/hr)
EU19-A	Haden Schweitzer LPP booth - Coating	Electrostatic/Air Atomization	45	6	270.00	259.20	7.24	656.39
EU19-A	Haden Schweitzer LPP booth - Catalyst					10.8	4.01	15.14
Haden Large Parts Booth PTE TOTALS:								

- Notes
1. Particulate PTE assumes PM=PM10=PM2.5
 2. Transfer Efficiency = 65%
 3. Capture Efficiency = 100%
 4. Control Efficiency = 99%
 5. Coating to Catalyst Ratio is 96% Coating, 4% Catalyst
 6. The paint booth guns are fed via lines from a paint kitchen. PTEs assume all six guns are operating at maximum capacity for 8,760 hrs/yr.

Haden Large Parts Paint Booth Solvent PTE (EU19-A)

Solvent	2022 Annual Usage (gals/yr)	Density	2022 Annual Usage (lbs/yr)	Ratio Potential Coating / Actual Coating	Potential Usage (lbs/yr)	VOC (%)	Potential VOC Emissions (lbs/hr)	Potential VOC Emissions (lbs/yr)
IPA	5.25	6.59	34.60	273.94	9,478	100%	1.08	9,478
Methyl n-Amyl Ketone	298.38	6.76	2,017		552,541	100%	63.08	552,541
Parcosol 283	764.87	6.59	5,040		1,380,784	35%	55.17	483,275
TOTALS			7,092		1,942,803		119.33	1,045,293

1. In addition to the spray gun coatings used above, CNH utilizes solvents in the painting operations. (EU19-A)
3. Total operating time for the three booths in 2022 was 7,665 hours per the note below:
 - a. Prime Booth operating hours are 21 hours per day x 365 days per year = 7,665.

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Haden Large Parts Paint Booth Spray G

EU#	Material Number	Particulates (PM, PM10, PM2.5)			Volatile Organic Compounds (VOCs)			Ethylbenzene CAS # 100-41-4		
		Uncontrolled PTE (tons/year)	Controlled PTE (lb/hr)	PM/PM10/PM2.5 Controlled PTE (tons/year)	Max VOC Content lb/gal	Uncontrolled PTE (lb/hr)	Uncontrolled VOC PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)
EU19-A	Haden Schweitzer LPP booth - Coating	2874.99	6.56	28.75	3.28	851.41	3,729.17	0.02	4.58	20.05
EU19-A	Haden Schweitzer LPP booth - Catalyst	66.31	15.14	66.31	4.01	43.25	189.45	0.00	0.00	0.00
		2,941.30		95.06			3,918.63			20.05

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency =
3. Capture Efficiency =
4. Control Efficiency =
5. Coating to Catalyst Ratio is 96% Coating, 4% Catalyst
6. The paint booth guns are fed via lines from a paint kit

Haden Large Parts Paint Booth Solvent

Solvent	2022 Annual Usage (gals/yr)	Potential VOC Emissions (tons/yr)
IPA	5.25	4.74
Methyl n-Amyl Ketone	298.38	276.27
Parcosol 283	764.87	241.64
TOTALS		522.65

1. In addition to the spray gun coatings used above, CNH (EU19-A)
3. Total operating time for the three booths in 2022 was
 - a. Prime Booth operating hours are 21 hours per day

**CNH Industrial America LLC
Fargo, ND**

Haden Large Parts Paint Booth Spray G

EU#	Material Number	Methyl Methacrylate CAS # 80-62-6			Naphthalene CAS # 91-20-3			Phenol CAS # 108-95-2		
		Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)
EU19-A	Haden Schweitzer LPP booth - Coating	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU19-A	Haden Schweitzer LPP booth - Catalyst	0.00	0.00	0.00	0.32	3.46	15.16	0.00	0.00	0.00
				0.00				15.16		

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency =
3. Capture Efficiency =
4. Control Efficiency =
5. Coating to Catalyst Ratio is 96% Coating, 4% Catalyst
6. The paint booth guns are fed via lines from a paint kit

Haden Large Parts Paint Booth Solvent

Solvent	2022 Annual Usage (gals/yr)
IPA	5.25
Methyl n-Amyl Ketone	298.38
Parcosol 283	764.87
TOTALS	

1. In addition to the spray gun coatings used above, CNH (EU19-A)
3. Total operating time for the three booths in 2022 was
 - a. Prime Booth operating hours are 21 hours per day

**CNH Industrial America LLC
Fargo, ND**

Haden Large Parts Paint Booth Spray G

EU#	Material Number	Toluene CAS # 108-88-3			Xylene CAS # 1330-20-7			Cumene CAS # 98-82-8		
		Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)
EU19-A	Haden Schweitzer LPP booth - Coating	0.04	9.66	42.32	0.07	18.31	80.20	0.00	0.00	0.00
EU19-A	Haden Schweitzer LPP booth - Catalyst	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				42.32				80.20		

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency =
3. Capture Efficiency =
4. Control Efficiency =
5. Coating to Catalyst Ratio is 96% Coating, 4% Catalyst
6. The paint booth guns are fed via lines from a paint kit

Haden Large Parts Paint Booth Solvent

Solvent	2022 Annual Usage (gals/yr)
IPA	5.25
Methyl n-Amyl Ketone	298.38
Parcosol 283	764.87
TOTALS	

1. In addition to the spray gun coatings used above, CNH (EU19-A)
3. Total operating time for the three booths in 2022 was
 - a. Prime Booth operating hours are 21 hours per day

**CNH Industrial America LLC
Fargo, ND**

Final Paint Booths Spray Gun PTE

EU#	Emission Unit Description	Application Method	Spray Ports	Maximum Application Rates (gal/hr)
EU13-B	Final Paint Booth #1 AG	HVLP	1	0.34
EU14-B	Final Paint Booth #2 CE	HVLP	1	0.34
EU45	Final Paint Booth #3 Rework	HVLP	1	0.34
Final Paint Booths PTE TOTALS:				1.03

Notes

- Particulate PTE assumes PM=PM10=PM2.5
- Transfer Efficiency = 75%
- Capture Efficiency = 100%
- Control Efficiency = 99%
- The final paint booths are used for touch-up purposes. The paint guns utilize a 22 oz cup which must be cleaned following each application. The fastest paint jobs are for drives hafts and other smaller parts. At most, these jobs would utilize 2 cups per hour (or 44 oz per hour). This number was utilized for the maximum application rate in each booth.

Final Paint Booths Aerosol/Solvent PTE

Chemical	2022 Annual Usage (gals/yr)	Density (lbs/gal)	2022 Annual Usage (lbs/yr)	Ratio Potential Coating / Actual Coating
Aerosols				
Cool It Black TC-1 (Aerosol) CNH Black	2.15	6.51	13.99	7.14
91-342 ALK-200 SOPHIE WHITE	3.78	6.15	23.26	
Sprayon Clear Insulating Varnish	14.13	6.15	86.87	
60-6827T1 Black Topcoat Aerosol	86.08	6.30882	543.03	
Red Aerosol	32.48	8.054	261.58	
60-6970T1 Tan Topcoat Aerosol	23.70	6.427	152.29	
349-172 Dark Grey Aerosol	140.44	6.292	883.64	
CNH Yellow Aerosol	2.38	6.459	15.35	
CE Gray Aerosol	87.51	6.292	550.60	
349-700 Black Primer Aerosol	51.42	9.01	463.30	
V2182838 PRIMER AEROSOL	12.08	7.5894	91.70	
Aerosol Bar-B-Que Black High Heat Spray Paint	0.56	6.45516	3.63	
Solvents				
IPA	388.90	6.59	2562.88	7.14
Methyl n-Amyl Ketone	176.66	6.76	1194.22	
Parcosol 283	104.06	6.59	685.75	
TOTALS	15.33			
EU13-B Total	6.13			
EU14-B Total	6.13			
EU45 Total	3.07			

- In addition to the spray gun coatings used above, CNH utilizes aerosol paint and solvents in the touch-up painting operations.
- Potential emissions were determined by taking the actual aerosol/solvent usage and multiplying by potential coating usage (1.03 gal/hr x 8760) vs actual cc
- Total operating time for the three booths in 2022 was 7,665+7,665+3,833 = 19,163 hours per notes below:
 - Final paint booths #1 and #2 operating hours are 21 hours per day x 365 days per year = 7,665.
 - Final paint booth #3 rework operating hours are 10.5 hours per day x 365 days per year =3,833.
- Emissions are allocated as follows:

EU13-B Percentage =	40.00%
EU14-B Percentage =	40.00%
EU45 Percentage =	20.00%

**CNH Industrial America LLC
Fargo, ND**

Final Paint Booths Spray Gun PTE

EU#	Emission Unit Description	Particulates (PM, PM10, PM2.5)				PM/PM10/PM2.5
		Max Solids Content lb/gal	Uncontrolled PTE (lb/hr)	Uncontrolled PTE (tons/year)	Controlled PTE (lb/hr)	Controlled PTE (tons/year)
EU13-B	Final Paint Booth #1 AG	7.32	0.63	2.76	0.01	0.03
EU14-B	Final Paint Booth #2 CE	7.32	0.63	2.76	0.01	0.03
EU45	Final Paint Booth #3 Rework	7.32	0.63	2.76	0.01	0.03
				8.27		0.08

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency = 75%
3. Capture Efficiency = 100%
4. Control Efficiency = 99%
5. The final paint booths are used for touch-up purposes. The paint guns utilize a 22 oz cup which r
The fastest paint jobs are for drives hafts and other smaller parts. At most, these jobs would utilize
This number was utilized for the maximum application rate in each booth.

Final Paint Booths Aerosol/Solvent PTE

Chemical	2022 Annual Usage (gals/yr)	Potential Usage (lbs/yr)	VOC (%)	Solids (%)	Volatile Organic Compounds	
					Potential VOC Emissions (lbs/hr)	Potential VOC Emissions (lbs/yr)
Aerosols						
Cool It Black TC-1 (Aerosol) CNH Black	2.15	99.95	55.70%	44.30%	0.01	55.67
91-342 ALK-200 SOPHIE WHITE	3.78	166.11	37.40%	62.60%	0.01	62.12
Sprayon Clear Insulating Varnish	14.13	620.42	60.50%	39.50%	0.04	375.35
60-6827T1 Black Topcoat Aerosol	86.08	3878.38	45.51%	54.49%	0.20	1765.05
Red Aerosol	32.48	1868.21	45.14%	54.86%	0.10	843.31
60-6970T1 Tan Topcoat Aerosol	23.70	1087.69	63.00%	37.00%	0.08	685.25
349-172 Dark Grey Aerosol	140.44	6311.02	46.99%	53.01%	0.34	2965.55
CNH Yellow Aerosol	2.38	109.61	40.50%	59.50%	0.01	44.39
CE Gray Aerosol	87.51	3932.43	43.49%	56.51%	0.20	1710.21
349-700 Black Primer Aerosol	51.42	3308.93	49.33%	50.67%	0.19	1632.29
V2182838 PRIMER AEROSOL	12.08	654.96	53.60%	46.40%	0.04	351.06
Aerosol Bar-B-Que Black High Heat Spray Paint	0.56	25.93	76.00%	24.50%	0.00	19.71
Solvents						
IPA	388.90	18304.19	100.00%	0.00%	2.09	18304.19
Methyl n-Amyl Ketone	176.66	8529.18	100.00%	0.00%	0.97	8529.18
Parcosol 283	104.06	4897.65	35.00%	0.00%	0.20	1714.18
TOTALS	15.33				4.46	39057.51
EU13-B Total	6.13				1.78	15622.60
EU14-B Total	6.13				1.78	15622.60
EU45 Total	3.07				0.89	7812.32

1. In addition to the spray gun coatings used above, CNH utilizes aerosol paint and solvents in the to
2. Potential emissions were determined by taking the actual aerosol/solvent usage and multiplying by rating usage (1,267.87 gal/yr).
3. Total operating time for the three booths in 2022 was 7,665+7,665+3,833 = 19,163 hours per note
 - a. Final paint booths #1 and #2 operating hours are 21 hours per day x 365 days per year = 7,665.
 - b. Final paint booth #3 reworking operating hours are 10.5 hours per day x 365 days per year =3,833.
4. Emissions are allocated as follows:
 - EU13-B Percentage = 40.00%
 - EU14-B Percentage = 40.00%
 - EU45 Percentage = 20.00%

**CNH Industrial America LLC
Fargo, ND**

Final Paint Booths Spray Gun PTE

EU#	Emission Unit Description	Volatile Organic Compounds (VOCs)			Ethylbenzene CAS # 100-41-4		
		Max VOC Content lb/gal	Uncontrolled PTE (lb/hr)	Uncontrolled VOC PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)
EU13-B	Final Paint Booth #1 AG	3.65	1.25	4.81	0.00	0.00	0.00
EU14-B	Final Paint Booth #2 CE	3.65	1.25	4.81	0.00	0.00	0.00
EU45	Final Paint Booth #3 Rework	3.65	1.25	2.40	0.00	0.00	0.00
				12.02			

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency = 75%
3. Capture Efficiency = 100%
4. Control Efficiency = 99%
5. The final paint booths are used for touch-up purposes. The paint guns utilize a 22 oz cup which r
The fastest paint jobs are for drives hafts and other smaller parts. At most, these jobs would utilize
This number was utilized for the maximum application rate in each booth.

Final Paint Booths Aerosol/Solvent PTE

Chemical	2022 Annual Usage (gals/yr)	VOCs		Particulates (PM, PM10, PM2.5)			
		Potential VOC Emissions (tons/yr)	Potential Uncontrolled Emissions (lbs/hr)	Potential Uncontrolled Emissions (lbs/yr)	Potential Uncontrolled Emissions (tons/yr)	Potential Controlled Emissions (lbs/hr)	Potential Controlled Emissions (lbs/yr)
Aerosols							
Cool It Black TC-1 (Aerosol) CNH Black	2.15	0.03	0.01	44.28	0.02	0.00	0.44
91-342 ALK-200 SOPHIE WHITE	3.78	0.03	0.01	103.99	0.05	0.00	1.04
Sprayon Clear Insulating Varnish	14.13	0.19	0.03	245.07	0.12	0.00	2.45
60-6827T1 Black Topcoat Aerosol	86.08	0.88	0.24	2113.33	1.06	0.00	21.13
Red Aerosol	32.48	0.42	0.12	1024.90	0.51	0.00	10.25
60-6970T1 Tan Topcoat Aerosol	23.70	0.34	0.05	402.45	0.20	0.00	4.02
349-172 Dark Grey Aerosol	140.44	1.48	0.38	3345.47	1.67	0.00	33.45
CNH Yellow Aerosol	2.38	0.02	0.01	65.22	0.03	0.00	0.65
CE Gray Aerosol	87.51	0.86	0.25	2222.22	1.11	0.00	22.22
349-700 Black Primer Aerosol	51.42	0.82	0.19	1676.63	0.84	0.00	16.77
V2182838 PRIMER AEROSOL	12.08	0.18	0.03	303.90	0.15	0.00	3.04
Aerosol Bar-B-Que Black High Heat Spray Paint	0.56	0.01	0.00	6.35	0.00	0.00	0.06
Solvents							
IPA	388.90	9.15	0.00	0.00	0.00	0.00	0.00
Methyl n-Amyl Ketone	176.66	4.26	0.00	0.00	0.00	0.00	0.00
Parcosol 283	104.06	0.86	0.00	0.00	0.00	0.00	0.00
TOTALS	15.33	19.53	1.32	11553.80	5.78	0.01	115.54
EU13-B Total	6.13	7.81	0.53	4621.40	2.31	0.01	46.21
EU14-B Total	6.13	7.81	0.53	4621.40	2.31	0.01	46.21
EU45 Total	3.07	3.91	0.26	2311.00	1.16	0.00	23.11

1. In addition to the spray gun coatings used above, CNH utilizes aerosol paint and solvents in the to
2. Potential emissions were determined by taking the actual aerosol/solvent usage and multiplying by
3. Total operating time for the three booths in 2022 was 7,665+7,665+3,833 = 19,163 hours per note
 - a. Final paint booths #1 and #2 operating hours are 21 hours per day x 365 days per year = 7,665.
 - b. Final paint booth #3 rework operating hours are 10.5 hours per day x 365 days per year =3,833.
4. Emissions are allocated as follows:
 - EU13-B Percentage = 40.00%
 - EU14-B Percentage = 40.00%
 - EU45 Percentage = 20.00%

**CNH Industrial America LLC
Fargo, ND**

Final Paint Booths Spray Gun PTE

EU#	Emission Unit Description	Methyl Methacrylate CAS # 80-62-6			Naphthalene CAS # 91-20-3		
		Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)
EU13-B	Final Paint Booth #1 AG	0.02	0.01	0.02	0.00	0.00	0.00
EU14-B	Final Paint Booth #2 CE	0.02	0.01	0.02	0.00	0.00	0.00
EU45	Final Paint Booth #3 Rework	0.02	0.01	0.01	0.00	0.00	0.00
				0.06			0.00

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency = 75%
3. Capture Efficiency = 100%
4. Control Efficiency = 99%
5. The final paint booths are used for touch-up purposes. The paint guns utilize a 22 oz cup which r
The fastest paint jobs are for drives hafts and other smaller parts. At most, these jobs would utilize
This number was utilized for the maximum application rate in each booth.

Final Paint Booths Aerosol/Solvent PTE

Chemical	2022 Annual Usage (gals/yr)	Potential Controlled Emissions (tons/yr)	Max HAP Content lb/gal	Ethylbenzene CAS # 100-41-4			Max HAP Content lb/gal
				Potential Emissions (lbs/hr)	Potential Emissions (lbs/yr)	Potential Emissions (ton/yr)	
Aerosols							
Cool It Black TC-1 (Aerosol) CNH Black	2.15	0.00	0.02	3.33E-05	0.29	1.46E-04	0
91-342 ALK-200 SOPHIE WHITE	3.78	0.00	0.00	0.00E+00	0.00	0.00E+00	0
Sprayon Clear Insulating Varnish	14.13	0.00	0.00	0.00E+00	0.00	0.00E+00	0
60-6827T1 Black Topcoat Aerosol	86.08	0.01	0.03	2.11E-03	18.44	9.22E-03	0
Red Aerosol	32.48	0.01	0.03	8.29E-04	7.26	3.63E-03	0
60-6970T1 Tan Topcoat Aerosol	23.70	0.00	0.05	9.66E-04	8.46	4.23E-03	0
349-172 Dark Grey Aerosol	140.44	0.02	0.05	5.73E-03	50.15	2.51E-02	0
CNH Yellow Aerosol	2.38	0.00	0.03	5.81E-05	0.51	2.55E-04	0
CE Gray Aerosol	87.51	0.01	0.05	3.57E-03	31.25	1.56E-02	0
349-700 Black Primer Aerosol	51.42	0.01	0.07	2.93E-03	25.71	1.29E-02	0
V2182838 PRIMER AEROSOL	12.08	0.00	0.00	9.85E-06	0.09	4.31E-05	0
Aerosol Bar-B-Que Black High Heat Spray Paint	0.56	0.00	0.05	2.29E-05	0.20	1.00E-04	0
Solvents							
IPA	388.90	0.00	0.00	0.00E+00	0.00	0.00E+00	0.00
Methyl n-Amyl Ketone	176.66	0.00	0.00	0.00E+00	0.00	0.00E+00	0.00
Parcosol 283	104.06	0.00	0.00	0.00E+00	0.00	0.00E+00	0.00
TOTALS	15.33	0.06	0.38	1.63E-02	142.36	7.12E-02	0.00
EU13-B Total	6.13	0.02	0.15	6.50E-03	56.94	2.85E-02	0.00
EU14-B Total	6.13	0.02	0.15	6.50E-03	56.94	2.85E-02	0.00
EU45 Total	3.07	0.01	0.08	3.25E-03	28.48	1.42E-02	0.00

1. In addition to the spray gun coatings used above, CNH utilizes aerosol paint and solvents in the to
2. Potential emissions were determined by taking the actual aerosol/solvent usage and multiplying by
3. Total operating time for the three booths in 2022 was 7,665+7,665+3,833 = 19,163 hours per note
 - a. Final paint booths #1 and #2 operating hours are 21 hours per day x 365 days per year = 7,665.
 - b. Final paint booth #3 rework operating hours are 10.5 hours per day x 365 days per year =3,833.
4. Emissions are allocated as follows:
 - EU13-B Percentage = 40.00%
 - EU14-B Percentage = 40.00%
 - EU45 Percentage = 20.00%

**CNH Industrial America LLC
Fargo, ND**

Final Paint Booths Spray Gun PTE

EU#	Emission Unit Description	Phenol CAS # 108-95-2			Toluene CAS # 108-88-3		
		Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)
EU13-B	Final Paint Booth #1 AG	0.00	0.00	0.00	0.00	0.00	0.00
EU14-B	Final Paint Booth #2 CE	0.00	0.00	0.00	0.00	0.00	0.00
EU45	Final Paint Booth #3 Rework	0.00	0.00	0.00	0.00	0.00	0.00
				0.00			
					0.00		

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency = 75%
3. Capture Efficiency = 100%
4. Control Efficiency = 99%
5. The final paint booths are used for touch-up purposes. The paint guns utilize a 22 oz cup which r
The fastest paint jobs are for drives hafts and other smaller parts. At most, these jobs would utilize
This number was utilized for the maximum application rate in each booth.

Final Paint Booths Aerosol/Solvent PTE

Chemical	2022 Annual Usage (gals/yr)	Methyl Methacrylate CAS # 80-62-6			Naphthalene CAS # 91-20-3		
		Potential Emissions (lbs/hr)	Potential Emissions (lbs/yr)	Potential Emissions (ton/yr)	Max HAP Content lb/gal	Potential Emissions (lbs/hr)	Potential Emissions (lbs/yr)
Aerosols							
Cool It Black TC-1 (Aerosol) CNH Black	2.15	0.00E+00	0.00	0.00E+00	0.03	4.56E-05	0.40
91-342 ALK-200 SOPHIE WHITE	3.78	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00
Sprayon Clear Insulating Varnish	14.13	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00
60-6827T1 Black Topcoat Aerosol	86.08	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00
Red Aerosol	32.48	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00
60-6970T1 Tan Topcoat Aerosol	23.70	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00
349-172 Dark Grey Aerosol	140.44	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00
CNH Yellow Aerosol	2.38	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00
CE Gray Aerosol	87.51	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00
349-700 Black Primer Aerosol	51.42	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00
V2182838 PRIMER AEROSOL	12.08	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00
Aerosol Bar-B-Que Black High Heat Spray Paint	0.56	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00
Solvents							
IPA	388.90	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00
Methyl n-Amyl Ketone	176.66	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00
Parcosol 283	104.06	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00
TOTALS	15.33	0.00E+00	0.00	0.00E+00	0.03	4.56E-05	0.40
EU13-B Total	6.13	0.00E+00	0.00	0.00E+00	0.01	1.83E-05	0.16
EU14-B Total	6.13	0.00E+00	0.00	0.00E+00	0.01	1.83E-05	0.16
EU45 Total	3.07	0.00E+00	0.00	0.00E+00	0.01	9.13E-06	0.08

1. In addition to the spray gun coatings used above, CNH utilizes aerosol paint and solvents in the to
2. Potential emissions were determined by taking the actual aerosol/solvent usage and mutplying by
3. Total operating time for the three booths in 2022 was 7,665+7,665+3,833 = 19,163 hours per note
 - a. Final paint booths #1 and #2 operating hours are 21 hours per day x 365 days per year = 7,665.
 - b. Final paint booth #3 rework operating hours are 10.5 hours per day x 365 days per year =3,833.
4. Emissions are allocated as follows:

EU13-B Percentage =	40.00%
EU14-B Percentage =	40.00%
EU45 Percentage =	20.00%

**CNH Industrial America LLC
Fargo, ND**

Final Paint Booths Spray Gun PTE

EU#	Emission Unit Description	Xylene CAS # 1330-20-7			Cumene CAS # 98-82-8		
		Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)	Max HAP Content lb/gal	Uncontrolled PTE (lbs/hr)	Uncontrolled PTE (ton/yr)
EU13-B	Final Paint Booth #1 AG	0.02	0.01	0.02	0.01	0.00	0.01
EU14-B	Final Paint Booth #2 CE	0.02	0.01	0.02	0.01	0.00	0.01
EU45	Final Paint Booth #3 Rework	0.02	0.01	0.01	0.01	0.00	0.01
		0.06			0.03		

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency = 75%
3. Capture Efficiency = 100%
4. Control Efficiency = 99%
5. The final paint booths are used for touch-up purposes. The paint guns utilize a 22 oz cup which r
The fastest paint jobs are for drives hafts and other smaller parts. At most, these jobs would utilize
This number was utilized for the maximum application rate in each booth.

Final Paint Booths Aerosol/Solvent PTE

Chemical	2022 Annual Usage (gals/yr)	Potential Emissions (ton/yr)	Max HAP Content lb/gal	Phenol CAS # 108-95-2				Toluene CAS # 108-88-3				Xylene CAS # 106-42-3	
				Potential Emissions (lbs/hr)	Potential Emissions (lbs/yr)	Potential Emissions (ton/yr)	Max HAP Content lb/gal	Potential Emissions (lbs/hr)	Potential Emissions (lbs/yr)	Potential Emissions (ton/yr)	Max HAP Content lb/gal	Potential Emissions (lbs/hr)	
Aerosols													
Cool It Black TC-1 (Aerosol) CNH Black	2.15	2.00E-04	0	0.00E+00	0.00	0.00E+00	0.70	1.22E-03	10.69	5.35E-03	0.72	1.26E-03	
91-342 ALK-200 SOPHIE WHITE	3.78	0.00E+00	0	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	
Sprayon Clear Insulating Varnish	14.13	0.00E+00	0	0.00E+00	0.00	0.00E+00	1.60	1.84E-02	161.31	8.07E-02	0.62	7.08E-03	
60-6827T1 Black Topcoat Aerosol	86.08	0.00E+00	0	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00	0.00E+00	1.01	7.08E-02	
Red Aerosol	32.48	0.00E+00	0	0.00E+00	0.00	0.00E+00	0.00	2.13E-05	0.19	9.34E-05	1.13	2.99E-02	
60-6970T1 Tan Topcoat Aerosol	23.70	0.00E+00	0	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00	0.00E+00	1.35	2.61E-02	
349-172 Dark Grey Aerosol	140.44	0.00E+00	0	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00	0.00E+00	1.32	1.51E-01	
CNH Yellow Aerosol	2.38	0.00E+00	0	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00	0.00E+00	0.65	1.25E-03	
CE Gray Aerosol	87.51	0.00E+00	0	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00	0.00E+00	1.01	7.18E-02	
349-700 Black Primer Aerosol	51.42	0.00E+00	0	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00	0.00E+00	2.70	1.13E-01	
V2182838 PRIMER AEROSOL	12.08	0.00E+00	0	0.00E+00	0.00	0.00E+00	0	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	
Aerosol Bar-B-Que Black High Heat Spray Paint	0.56	0.00E+00	0	0.00E+00	0.00	0.00E+00	0.06	2.96E-05	0.26	1.30E-04	0.97	4.44E-04	
Solvents													
IPA	388.90	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	
Methyl n-Amyl Ketone	176.66	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	
Parcosol 283	104.06	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	
TOTALS	15.33	2.00E-04	0.00	0.00E+00	0.00	0.00E+00	2.36	1.97E-02	172.45	8.62E-02	11.46	4.73E-01	
EU13-B Total	6.13	8.00E-05	0.00	0.00E+00	0.00	0.00E+00	0.94	7.87E-03	68.98	3.45E-02	4.59	1.89E-01	
EU14-B Total	6.13	8.00E-05	0.00	0.00E+00	0.00	0.00E+00	0.94	7.87E-03	68.98	3.45E-02	4.59	1.89E-01	
EU45 Total	3.07	4.00E-05	0.00	0.00E+00	0.00	0.00E+00	0.47	3.94E-03	34.49	1.72E-02	2.29	9.47E-02	

1. In addition to the spray gun coatings used above, CNH utilizes aerosol paint and solvents in the to
2. Potential emissions were determined by taking the actual aerosol/solvent usage and multiplying by
3. Total operating time for the three booths in 2022 was 7,665+7,665+3,833 = 19,163 hours per note
 - a. Final paint booths #1 and #2 operating hours are 21 hours per day x 365 days per year = 7,665.
 - b. Final paint booth #3 rework operating hours are 10.5 hours per day x 365 days per year =3,833.
4. Emissions are allocated as follows:
 - EU13-B Percentage = 40.00%
 - EU14-B Percentage = 40.00%
 - EU45 Percentage = 20.00%

**CNH Industrial America LLC
Fargo, ND**

Final Paint Booths Spray Gun PTE

EU#	Emission Unit Description
EU13-B	Final Paint Booth #1 AG
EU14-B	Final Paint Booth #2 CE
EU45	Final Paint Booth #3 Rework

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency = 75%
3. Capture Efficiency = 100%
4. Control Efficiency = 99%
5. The final paint booths are used for touch-up purposes. The paint guns utilize a 22 oz cup which r
The fastest paint jobs are for drives hafts and other smaller parts. At most, these jobs would utilize
This number was utilized for the maximum application rate in each booth.

Final Paint Booths Aerosol/Solvent PTE

Chemical	2022 Annual Usage (gals/yr)	§ 1330-20-7		Cumene CAS # 98-82-8			
		Potential Emissions (lbs/yr)	Potential Emissions (ton/yr)	Max HAP Content lb/gal	Potential Emissions (lbs/hr)	Potential Emissions (lbs/yr)	Potential Emissions (ton/yr)
Aerosols							
Cool It Black TC-1 (Aerosol) CNH Black	2.15	10.99	5.50E-03	0	0.00E+00	0.00	0.00E+00
91-342 ALK-200 SOPHIE WHITE	3.78	0.00	0.00E+00	0	0.00E+00	0.00	0.00E+00
Sprayon Clear Insulating Varnish	14.13	62.04	3.10E-02	0	0.00E+00	0.00	0.00E+00
60-6827T1 Black Topcoat Aerosol	86.08	620.54	3.10E-01	0	0.00E+00	0.00	0.00E+00
Red Aerosol	32.48	261.55	1.31E-01	0	0.00E+00	0.00	0.00E+00
60-6970T1 Tan Topcoat Aerosol	23.70	228.42	1.14E-01	0	0.00E+00	0.00	0.00E+00
349-172 Dark Grey Aerosol	140.44	1325.31	6.63E-01	0	0.00E+00	0.00	0.00E+00
CNH Yellow Aerosol	2.38	10.96	5.48E-03	0	0.00E+00	0.00	0.00E+00
CE Gray Aerosol	87.51	629.19	3.15E-01	0	0.00E+00	0.00	0.00E+00
349-700 Black Primer Aerosol	51.42	992.68	4.96E-01	0	0.00E+00	0.00	0.00E+00
V2182838 PRIMER AEROSOL	12.08	0.00	0.00E+00	0	0.00E+00	0.00	0.00E+00
Aerosol Bar-B-Que Black High Heat Spray Paint	0.56	3.89	1.94E-03	0	0.00E+00	0.00	0.00E+00
Solvents							
IPA	388.90	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00
Methyl n-Amyl Ketone	176.66	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00
Parcosol 283	104.06	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00
TOTALS	15.33	4145.57	2.07E+00	0.00	0.00E+00	0.00	0.00E+00
EU13-B Total	6.13	1658.19	8.29E-01	0.00	0.00E+00	0.00	0.00E+00
EU14-B Total	6.13	1658.19	8.29E-01	0.00	0.00E+00	0.00	0.00E+00
EU45 Total	3.07	829.20	4.15E-01	0.00	0.00E+00	0.00	0.00E+00

1. In addition to the spray gun coatings used above, CNH utilizes aerosol paint and solvents in the to
2. Potential emissions were determined by taking the actual aerosol/solvent usage and mutplying by
3. Total operating time for the three booths in 2022 was 7,665+7,665+3,833 = 19,163 hours per note
 - a. Final paint booths #1 and #2 operating hours are 21 hours per day x 365 days per year = 7,665.
 - b. Final paint booth #3 rework operating hours are 10.5 hours per day x 365 days per year =3,833.
4. Emissions are allocated as follows:

EU13-B Percentage =	40.00%
EU14-B Percentage =	40.00%
EU45 Percentage =	20.00%

Final Paint Booths Spray Gun PTE

EU#	Emission Unit Description
EU13-B	Final Paint Booth #1 AG
EU14-B	Final Paint Booth #2 CE
EU45	Final Paint Booth #3 Rework

Notes

1. Particulate PTE assumes PM=PM10=PM2.5
2. Transfer Efficiency = 75%
3. Capture Efficiency = 100%
4. Control Efficiency = 99%
5. The final paint booths are used for touch-up purposes. The paint guns utilize a 22 oz cup which r
 The fastest paint jobs are for drives hafts and other smaller parts. At most, these jobs would utilize
 This number was utilized for the maximum application rate in each booth.

Final Paint Booths Aerosol/Solvent PTE

Chemical	2022 Annual Usage (gals/yr)
Aerosols	
Cool It Black TC-1 (Aerosol) CNH Black	2.15
91-342 ALK-200 SOPHIE WHITE	3.78
Sprayon Clear Insulating Varnish	14.13
60-6827T1 Black Topcoat Aerosol	86.08
Red Aerosol	32.48
60-6970T1 Tan Topcoat Aerosol	23.70
349-172 Dark Grey Aerosol	140.44
CNH Yellow Aerosol	2.38
CE Gray Aerosol	87.51
349-700 Black Primer Aerosol	51.42
V2182838 PRIMER AEROSOL	12.08
Aerosol Bar-B-Que Black High Heat Spray Paint	0.56
Solvents	
IPA	388.90
Methyl n-Amyl Ketone	176.66
Parcosol 283	104.06
TOTALS	15.33
EU13-B Total	6.13
EU14-B Total	6.13
EU45 Total	3.07

1. In addition to the spray gun coatings used above, CNH utilizes aerosol paint and solvents in the to
2. Potential emissions were determined by taking the actual aerosol/solvent usage and mutplying by
3. Total operating time for the three booths in 2022 was 7,665+7,665+3,833 = 19,163 hours per note
 - a. Final paint booths #1 and #2 operating hours are 21 hours per day x 365 days per year = 7,665.
 - b. Final paint booth #3 rework operating hours are 10.5 hours per day x 365 days per year =3,833.
4. Emissions are allocated as follows:

EU13-B Percentage =	40.00%
EU14-B Percentage =	40.00%
EU45 Percentage =	20.00%

**CNH Industrial America LLC
Fargo, ND**

Material Breakdown

Material Number	Product	Density (lbs/gal)	VOCs (%)	VOCs (lbs/gal)	Solids Content (%)	Slids Content (lbs/gal)	PM Reduction Factor (%)	PM Emissions Reduced (lbs/mon)	Ethyl-benzene (%)	Ethyl-benzene (lbs/gal)	Glycol Ethers (%)	Glycol Ethers (lbs/gal)	Methyl Methacrylate (%)	Methyl Methacrylate (lbs/gal)	Naphthalene (%)	Naphthalene (lbs/gal)
AEROSOLS																
12001	Cool It Black TC-1 (Aerosol) CNH Black	6.51	55.70%	3.63	44.30%	2.88	99.00%	0.03	1.90%	0.12					0.4%	0.03
299044A1S	91-342 ALK-200 SOPHIE WHITE	6.15	37.40%	2.30	62.60%	3.85	99.00%	0.04								
S00600	Sprayon Clear Isulating Varnish	6.15	60.50%	3.72	39.50%	2.43	99.00%	0.02								
Q1340-9001	60-6827T1 Black Topcoat Aerosol	6.31	45.51%	2.87	54.49%	3.44	99.00%	0.03	3.00%	0.19						
Q1390-9002	Red Aerosol	8.05	45.14%	3.64	54.86%	4.42	99.00%	0.04	3.13%	0.25						
Q1390-9003	60-6970T1 Tan Topcoat Aerosol	6.43	63.00%	4.05	37.00%	2.38	99.00%	0.02	5.00%	0.32						
Q1390-9004	349-172 Dark Grey Aerosol	6.29	46.99%	2.96	53.01%	3.34	99.00%	0.03	5.00%	0.31						
Q1390-9006	CNH Yellow Aerosol	6.46	40.50%	2.62	59.50%	3.84	99.00%	0.04	3.00%	0.19						
Q1390-9008	CE Gray Aerosol	6.29	43.49%	2.74	56.51%	3.56	99.00%	0.04	5.00%	0.31						
W42447	349-700 Black Primer Aerosol	9.01	49.33%	4.44	50.67%	4.57	99.00%	0.05	7.00%	0.63						
539010	V2182838 PRIMER AEROSOL	7.59	53.60%	4.07	46.40%	3.52	99.00%	0.04	0.10%	0.01						
SP13	Aerosol Bar-B-Que Black High Heat Spray Pa	6.46	76.00%	4.91	24.50%	1.58	99.00%	0.02	5.00%	0.32						
COATINGS																
SPU60140	Spectracron MS42 Tan	9.86	34.70%	3.42	65.30%	6.44	99.00%	0.06					0.10%	0.01		
SPU60166	CE Grey Spectracron	8.55	40.30%	3.45	59.70%	5.10	99.00%	0.05					0.20%	0.02		
SPU65290B	Spectracron SPU CNH Red	8.32	35.60%	2.96	51.30%	4.27	99.00%	0.04					0.10%	0.01		
SPU65292	Dark Gray	8.41	43.40%	3.65	56.70%	4.77	99.00%	0.05					0.20%	0.02		
GHX1080	Urethane Hardener	9.15	20.00%	1.83	80.00%	7.32	99.00%	0.07								
SOLVENTS																
IPA	Isopropyl Alcohol	6.59	100.00%	6.59	0.00%	0.00	99.00%	0.00								
MAK	Methyl n-Amyl Ketone	6.76	100.00%	6.76	0.00%	0.00	99.00%	0.00								
Parcosol 28	Parcosol 283	6.59	35.00%	2.31	0.00%	0.00	99.00%	0.00								
Final Parts Paint Booths-3 (EU13/EU14/EU45)			43.40%	3.6	80.00%	7.3	99.00%	0.1	0.00%	0.0	0.00%	0.0	0.20%	0.0	0.00%	0.0
SOLVENTS																
IPA	Isopropyl Alcohol	6.59	100.00%	6.59	0.00%	0.00	99.00%	0.00								
MAK	Methyl n-Amyl Ketone	6.76	100.00%	6.76	0.00%	0.00	99.00%	0.00								
Parcosol 28	Parcosol 283	6.59	35.00%	2.31	0.00%	0.00	99.00%	0.00								
COATINGS																
SEP63137	Gray Texture Spectracron	12.12	24.60%	2.98	75.40%	9.14	99.00%	0.09	0.20%	0.02						
W42801	Black HS Primer Spectracron	12.28	25.00%	3.07	75.00%	9.21	99.00%	0.09	0.20%	0.02						
W43435	Spectracron SPE Grey Primer	12.49	24.40%	3.05	75.60%	9.44	99.00%	0.09	0.30%	0.04						
W45315	GXA Acid Catalyst	9.50	23.00%	2.19	77.00%	7.32	99.00%	0.07								
Koch Prime Booth (EU38)			25.00%	3.1	75.60%	9.4	99.00%	0.1	0.30%	0.0	0.00%	0.0	0.00%	0.0	0.00%	0.0
SOLVENTS																
IPA	Isopropyl Alcohol	6.59	100.00%	6.59	0.00%	0.00	99.00%	0.00								
MAK	Methyl n-Amyl Ketone	6.76	100.00%	6.76	0.00%	0.00	99.00%	0.00								
Parcosol 28	Parcosol 283	6.59	35.00%	2.31	0.00%	0.00	99.00%	0.00								
COATINGS																
GXA61568	Catalyst	8.01	50.00%	4.01	50.00%	4.01	99.00%	0.04							4.00%	0.32
SAC63432	Spectracron SAC MS45 Black	8.65	32.10%	2.78	67.90%	5.87	99.00%	0.06								
SAC64414	SAC CE Gray HS	8.57	32.00%	2.74	68.00%	5.83	99.00%	0.06								
SAC67147	Spectracron SAC 6282N Orange	8.7	35.30%	3.07	64.70%	5.63	99.00%	0.06	0.10%	0.01	1.28%	0.11				
SAC71481	Spectracron SAC Ag Red HS	8.83	37.20%	3.28	62.80%	5.55	99.00%	0.06	0.20%	0.02						
SAC75451	Wheatland Yellow SAC	8.97	30.60%	2.74	69.40%	6.23	99.00%	0.06								
W43347B	Spectracron SAC MS42 Tan	9.32	30.40%	2.83	69.60%	6.49	99.00%	0.06								
W43584E	Spectracron SAC NH Bright Yellow HS Spect	9.66	25.20%	2.43	74.90%	7.24	99.00%	0.07								
W43702M	Spectracron SAC Dark Gray HS	8.49	28.70%	2.44	71.30%	6.05	99.00%	0.06								
New Large Parts Paint Booth NLPP (EU19)			37.20%	3.3	74.90%	7.2	99.00%	0.1	0.20%	0.0	1.28%	0.1	0.00%	0.0	0.00%	0.0

**CNH Industrial America LLC
Fargo, ND**

Material Breakdown

Material Number	Product	Phenol (%)	Phenol (lbs/gal)	Toluene (%)	Toluene (lbs/gal)	Xylene (%)	Xylene (lbs/gal)	Cumene (%)	Cumene (lbs/gal)
AEROSOLS									
12001	Cool It Black TC-1 (Aerosol) CNH Black			10.70%	0.70	11.00%	0.72		
299044A1S	91-342 ALK-200 SOPHIE WHITE								
S00600	Sprayon Clear Isulating Varnish			26.00%	1.60	10.00%	0.62		
Q1340-9001	60-6827T1 Black Topcoat Aerosol					16.00%	1.01		
Q1390-9002	Red Aerosol			0.01%	0.00	14.00%	1.13		
Q1390-9003	60-6970T1 Tan Topcoat Aerosol					21.00%	1.35		
Q1390-9004	349-172 Dark Grey Aerosol					21.00%	1.32		
Q1390-9006	CNH Yellow Aerosol					10.00%	0.65		
Q1390-9008	CE Gray Aerosol					16.00%	1.01		
W42447	349-700 Black Primer Aerosol					30.00%	2.70		
539010	V2182838 PRIMER AEROSOL								
SP13	Aerosol Bar-B-Que Black High Heat Spray Pa			1.00%	0.06	15.00%	0.97		
COATINGS									
SPU60140	Spectracron MS42 Tan								
SPU60166	CE Grey Spectracron								
SPU65290B	Spectracron SPU CNH Red								
SPU65292	Dark Gray								
GHX1080	Urethane Hardener					0.20%	0.02	0.10%	0.01
SOLVENTS									
IPA	Isopropyl Alcohol								
MAK	Methyl n-Amyl Ketone								
Parcosol 28	Parcosol 283								
Final Parts Paint Booths-3 (EU13/EU14/EU45)		0.00%	0.0	0.00%	0.0	0.20%	0.0	0.10%	0.0
SOLVENTS									
IPA	Isopropyl Alcohol								
MAK	Methyl n-Amyl Ketone								
Parcosol 28	Parcosol 283								
COATINGS									
SEP63137	Gray Texture Spectracron					0.80%	0.10		
W42801	Black HS Primer Spectracron					1.00%	0.12		
W43435	Spectracron SPE Grey Primer					1.40%	0.17		
W45315	GXA Acid Catalyst	3.00%	0.29						
Koch Prime Booth (EU38)		0.00%	0.0	0.00%	0.0	1.40%	0.2	0.00%	0.0
SOLVENTS									
IPA	Isopropyl Alcohol								
MAK	Methyl n-Amyl Ketone								
Parcosol 28	Parcosol 283								
COATINGS									
GXA61568	Catalyst								
SAC63432	Spectracron SAC MS45 Black			0.30%	0.03	0.40%	0.03		
SAC64414	SAC CE Gray HS			0.20%	0.02	0.30%	0.03		
SAC67147	Spectracron SAC 6282N Orange					0.60%	0.05		
SAC71481	Spectracron SAC Ag Red HS					0.80%	0.07		
SAC75451	Wheatland Yellow SAC					0.30%	0.03		
W43347B	Spectracron SAC MS42 Tan			0.40%	0.04	0.50%	0.05		
W43584E	Spectracron SAC NH Bright Yellow HS Spect					0.30%	0.03		
W43702M	Spectracron SAC Dark Gray HS			0.20%	0.02	0.30%	0.03		
New Large Parts Paint Booth NLPP (EU19)		0.00%	0.0	0.40%	0.0	0.80%	0.1	0.00%	0.0

CNH Industrial America LLC
Fargo, ND

Combustion Emissions - Natural Gas				
Emission Unit #	Source Description		Input	Input Units
EU19-B	Natural Gas-fired Burner	Haden Schweitzer Large Paint Booth	11.0	MMBtu/hour
EU20-A	Bake Oven Burner #1	Haden Schweitzer Large Paint Booth	2.6	MMBtu/hour
EU20-B2	Bake Oven Burner #2	Haden Schweitzer Large Paint Booth	5.0	MMBtu/hour
EU20-B3	Bake Oven Burner #3	Haden Schweitzer Large Paint Booth	5.8	MMBtu/hour
EU38-B	Natural Gas-fired Burner	Koch Prime Booth AMU	8.5	MMBtu/hour
EU41	Natural Gas-fired Boiler #1	Koch Wash System	5.25	MMBtu/hour
EU42	Natural Gas-fired Boiler #2	Koch Wash System	5.25	MMBtu/hour
EU47	Burn-Off Oven	Ace Equipment Burn-Off Oven	3.20	MMBtu/hour
IS	Natural Gas-fired Space Heaters	Facility wide (combined)	30	MMBtu/hour
IS	Natural Gas-fired bake oven burner	Large Parts Booth	2.6	MMBtu/hour
IS	Air Make Up Unit	NA	3.37	MMBtu/hour
IS	Air Make Up Unit	NA	0.944	MMBtu/hour
IS	Natural Gas-fired radiant zone burner	Koch Prime Booth	1.0	MMBtu/hour
IS	Natural Gas-fired cure oven burner	Koch Prime Booth	3.5	MMBtu/hour
Permit Group #	Source Description		Input	Input Units
EU	NG Combustion Equipment (Burners on paint booth and bake ovens)		46.60	MMBtu/hour
IS	Insignificant or Fugitive Emission Sources (space heaters, small burners, air makeup units)		41.41	MMBtu/hour
N/A	All Fuel Combustion Sources		88.01	MMBtu/hour

- Notes:
- EU = Emission Unit. IS = Insignificant or Fugitive Emission Source (based on current Title V permit).
 - (a) Criteria Air Pollutant and Greenhouse Gas (N₂O, CO₂, and CH₄) Emission factors obtained from AP-42, Tables 1.4.1 and 1.4.2 for combustion sources
 - (b) CO₂e Emission Factors from EPA: N₂O = 298; CO₂ = 1; CH₄ = 25
 - (c) Ammonia Emission factor obtained from Table 5-2 NAPAP Fuel Oil and Natural Gas Emission Factors (Natural Gas - Utility and industrial boilers) in
 - (d) Natural Gas Combustion HAP emission factors from AP-42, Tables 1.4.3 and 1.4.4 for Speciated Organic Compounds and Metals.
 - (e) Particulate emission factors (PM/PM₁₀/PM_{2.5} = 0.023 lbs/hr) for EU47 burnoff oven provided by the manufacturer.

CNH Industrial America LLC
Fargo, ND

Combustion		Criteria Pollutants and Greenhouse Gases						
Emission Unit #	Fuel Source	PM Emission Factor (lb/MMscf)(a)	PM Emission Rate (lb/hr)	PM Emissions (tons/yr)	PM10 Emission Rate (lb/hr)	PM10 Emissions (tons/yr)	PM2.5 Emission Rate (lb/hr)	PM2.5 Potential Emissions (tons/yr)
EU19-B	Natural Gas	7.6	8.20E-02	3.59E-01	8.20E-02	3.59E-01	8.20E-02	3.59E-01
EU20-A	Natural Gas	7.6	1.94E-02	8.49E-02	1.94E-02	8.49E-02	1.94E-02	8.49E-02
EU20-B2	Natural Gas	7.6	3.73E-02	1.63E-01	3.73E-02	1.63E-01	3.73E-02	1.63E-01
EU20-B3	Natural Gas	7.6	4.32E-02	1.89E-01	4.32E-02	1.89E-01	4.32E-02	1.89E-01
EU38-B	Natural Gas	7.6	6.33E-02	2.77E-01	6.33E-02	2.77E-01	6.33E-02	2.77E-01
EU41	Natural Gas	7.6	3.91E-02	1.71E-01	3.91E-02	1.71E-01	3.91E-02	1.71E-01
EU42	Natural Gas	7.6	3.91E-02	1.71E-01	3.91E-02	1.71E-01	3.91E-02	1.71E-01
EU47	Natural Gas	See Note	2.30E-02	1.01E-01	2.30E-02	1.01E-01	2.30E-02	1.01E-01
Totals				1.52E+00		1.52E+00		1.52E+00
IS	Natural Gas	7.6	2.24E-01	9.79E-01	2.24E-01	9.79E-01	2.24E-01	9.79E-01
IS	Natural Gas	7.6	1.94E-02	8.49E-02	1.94E-02	8.49E-02	1.94E-02	8.49E-02
IS	Natural Gas	7.6	2.51E-02	1.10E-01	2.51E-02	1.10E-01	2.51E-02	1.10E-01
IS	Natural Gas	7.6	7.03E-03	3.08E-02	7.03E-03	3.08E-02	7.03E-03	3.08E-02
IS	Natural Gas	7.6	7.45E-03	3.26E-02	7.45E-03	3.26E-02	7.45E-03	3.26E-02
IS	Natural Gas	7.6	2.61E-02	1.14E-01	2.61E-02	1.14E-01	2.61E-02	1.14E-01
Totals				1.35E+00		1.35E+00		1.35E+00
Permit Group #	Fuel Source	PM Emission Factor (lb/MMscf)(a)	PM Emission Rate (lb/hr)	PM Emissions (tons/yr)	PM10 Emission Rate (lb/hr)	PM10 Emissions (tons/yr)	PM2.5 Emission Rate (lb/hr)	PM2.5 Potential Emissions (tons/yr)
EU	Natural Gas	7.6	3.47E-01	1.52E+00	3.47E-01	1.52E+00	3.47E-01	1.52E+00
IS	Natural Gas	7.6	3.09E-01	1.35E+00	3.09E-01	1.35E+00	3.09E-01	1.35E+00
N/A	Natural Gas	7.6	6.56E-01	2.87E+00	6.56E-01	2.87E+00	6.56E-01	2.87E+00

- Notes:
- EU = Emission Unit
 - (a) Criteria Air Pollutant, uncontrolled at < 100 MM BTU/hour using 1,020 MMBtu/scf.
 - (b) CO₂e Emission
 - (c) Ammonia Emission Factor EPA Work Assignment, Development and Selection of Ammonia Emission Factors Final Report, August 1994.
 - (d) Natural Gas Combustion
 - (e) Particulate emissions

CNH Industrial America LLC
Fargo, ND

Combustion

Emission Unit #	VOC Emission Factor (lb/MMscf)(a)	VOC Emission Rate (lb/hr)	VOC Emissions (tons/yr)	SOx Emission Factor (lb/MMscf)(a)	SOx Emission Rate (lb/hr)	SOx Emissions (tons/yr)	NOx Emission Factor (lb/MMscf)(a)	NOx Emission Rate (lb/hr)	NOx Emissions (tons/yr)	CO Emission Factor (lb/MMscf)(a)	CO Emission Rate (lb/hr)	CO Emissions (tons/yr)	Lead Emission Factor (lb/MMscf)(a)
EU19-B	5.5	5.93E-02	2.60E-01	0.6	6.47E-03	2.83E-02	100	1.08E+00	4.72E+00	84	9.06E-01	3.97E+00	0.0005
EU20-A	5.5	1.40E-02	6.14E-02	0.6	1.53E-03	6.70E-03	100	2.55E-01	1.12E+00	84	2.14E-01	9.38E-01	0.0005
EU20-B2	5.5	2.70E-02	1.18E-01	0.6	2.94E-03	1.29E-02	100	4.90E-01	2.15E+00	84	4.12E-01	1.80E+00	0.0005
EU20-B3	5.5	3.13E-02	1.37E-01	0.6	3.41E-03	1.49E-02	100	5.69E-01	2.49E+00	84	4.78E-01	2.09E+00	0.0005
EU38-B	5.5	4.58E-02	2.01E-01	0.6	5.00E-03	2.19E-02	100	8.33E-01	3.65E+00	84	7.00E-01	3.07E+00	0.0005
EU41	5.5	2.83E-02	1.24E-01	0.6	3.09E-03	1.35E-02	100	5.15E-01	2.25E+00	84	4.32E-01	1.89E+00	0.0005
EU42	5.5	2.83E-02	1.24E-01	0.6	3.09E-03	1.35E-02	100	5.15E-01	2.25E+00	84	4.32E-01	1.89E+00	0.0005
EU47	5.5	1.73E-02	7.56E-02	0.6	1.88E-03	8.24E-03	100	3.14E-01	1.37E+00	84	2.64E-01	1.15E+00	0.0005
			1.10E+00			1.20E-01			2.00E+01			1.68E+01	
IS	5.5	1.62E-01	7.09E-01	0.6	1.76E-02	7.73E-02	100	2.94E+00	1.29E+01	84	2.47E+00	1.08E+01	0.0005
IS	5.5	1.40E-02	6.14E-02	0.6	1.53E-03	6.70E-03	100	2.55E-01	1.12E+00	84	2.14E-01	9.38E-01	0.0005
IS	5.5	1.82E-02	7.96E-02	0.6	1.98E-03	8.68E-03	100	3.30E-01	1.45E+00	84	2.78E-01	1.22E+00	0.0005
IS	5.5	5.09E-03	2.23E-02	0.6	5.55E-04	2.43E-03	100	9.25E-02	4.05E-01	84	7.77E-02	3.41E-01	0.0005
IS	5.5	5.39E-03	2.36E-02	0.6	5.88E-04	2.58E-03	100	9.80E-02	4.29E-01	84	8.24E-02	3.61E-01	0.0005
IS	5.5	1.89E-02	8.27E-02	0.6	2.06E-03	9.02E-03	100	3.43E-01	1.50E+00	84	2.88E-01	1.26E+00	0.0005
			9.78E-01			1.07E-01			1.78E+01			1.49E+01	
Permit Group #	VOC Emission Factor (lb/MMscf)(a)	VOC Emission Rate (lb/hr)	VOC Emissions (tons/yr)	SOx Emission Factor (lb/MMscf)(a)	SOx Emission Rate (lb/hr)	SOx Emissions (tons/yr)	NOx Emission Factor (lb/MMscf)(a)	NOx Emission Rate (lb/hr)	NOx Emissions (tons/yr)	CO Emission Factor (lb/MMscf)(a)	CO Emission Rate (lb/hr)	CO Emissions (tons/yr)	Lead Emission Factor (lb/MMscf)(a)
EU	5.5	2.51E-01	1.10E+00	0.6	2.74E-02	1.20E-01	100	4.57E+00	2.00E+01	84	3.84E+00	1.68E+01	0.0005
IS	5.5	2.23E-01	9.78E-01	0.6	2.44E-02	1.07E-01	100	4.06E+00	1.78E+01	84	3.41E+00	1.49E+01	0.0005
N/A	5.5	4.75E-01	2.08E+00	0.6	5.18E-02	2.27E-01	100	8.63E+00	3.78E+01	84	7.25E+00	3.17E+01	0.0005

Notes:

EU = Emission Unit

(a) Criteria Air Poll

(b) CO2e Emission

(c) Ammonia Emis

(d) Natural Gas Co

(e) Particulate emis

Pinnacle Engineering, Inc.

7389 Airport View Dr. SW

Rochester, MN 55902

Crenlo Cab Products, Inc. Plant 2

Permit Reissuance Update

3/27/2024

CNH Industrial America LLC
Fargo, ND

Combustio

Emission Unit #	Lead Emission Rate (lb/hr)	Lead Emissions (tons/yr)	N2O Emission Factor (lb/MMscf)(a)	N2O Emission Rate (lb/hr)	N ₂ O Potential Emissions (tons/yr)
EU19-B	5.39E-06	2.36E-05	2.2	2.37E-02	1.04E-01
EU20-A	1.27E-06	5.58E-06	2.2	5.61E-03	2.46E-02
EU20-B2	2.45E-06	1.07E-05	2.2	1.08E-02	4.72E-02
EU20-B3	2.84E-06	1.25E-05	2.2	1.25E-02	5.48E-02
EU38-B	4.17E-06	1.83E-05	2.2	1.83E-02	8.03E-02
EU41	2.57E-06	1.13E-05	2.2	1.13E-02	4.96E-02
EU42	2.57E-06	1.13E-05	2.2	1.13E-02	4.96E-02
EU47	1.57E-06	6.87E-06	2.2	6.90E-03	3.02E-02
		1.00E-04			4.40E-01
IS	1.47E-05	6.44E-05	2.2	6.47E-02	2.83E-01
IS	1.27E-06	5.58E-06	2.2	5.61E-03	2.46E-02
IS	1.65E-06	7.24E-06	2.2	7.27E-03	3.18E-02
IS	4.63E-07	2.03E-06	2.2	2.04E-03	8.92E-03
IS	4.90E-07	2.15E-06	2.2	2.16E-03	9.45E-03
IS	1.72E-06	7.51E-06	2.2	7.55E-03	3.31E-02
		8.89E-05			3.91E-01
Permit Group #	Lead Emission Rate (lb/hr)	Lead Emissions (tons/yr)	N2O Emission Factor (lb/MMscf)(a)	N2O Emission Rate (lb/hr)	N ₂ O Potential Emissions (tons/yr)
EU	2.28E-05	1.00E-04	2.2	1.01E-01	4.40E-01
IS	2.03E-05	8.89E-05	2.2	8.93E-02	3.91E-01
N/A	4.31E-05	1.89E-04	2.2	1.90E-01	8.31E-01

Notes:

EU = Emission Un

(a) Criteria Air Poll

(b) CO₂e Emission

(c) Ammonia Emis

(d) Natural Gas Co

(e) Particulate emis

Pinnacle Engineering, Inc.

7389 Airport View Dr. SW

Rochester, MN 55902

Crenlo Cab Products, Inc. Plant 2

Permit Reissuance Update

3/27/2024

CNH Industrial America LLC
Fargo, ND

Combustion								Ammonia (c)		
Emission Unit #	CO ₂ Emission Factor (lb/MMscf)(a)	CO ₂ Emission Rate (lb/hr)	CO ₂ Potential Emissions (tons/yr)	CH ₄ Emission Factor (lb/MMscf)(a)	CH ₄ Emission Rate (lb/hr)	CH ₄ Potential Emissions (tons/yr)	CO ₂ e Emissions (tons/yr)(b)	Ammonia Emission Factor (lb/MMscf)	Ammonia Emission Rate (lb/hr)	Ammonia Emissions (tons/yr)
EU19-B	120,000	1,294.12	5,668.24	2.3	2.48E-02	1.09E-01	5,701.92	3.2	3.35E-02	1.47E-01
EU20-A	120,000	305.88	1,339.76	2.3	5.86E-03	2.57E-02	1,347.73	3.2	7.92E-03	3.47E-02
EU20-B2	120,000	588.24	2,576.47	2.3	1.13E-02	4.94E-02	2,591.78	3.2	1.52E-02	6.67E-02
EU20-B3	120,000	682.35	2,988.71	2.3	1.31E-02	5.73E-02	3,006.47	3.2	1.77E-02	7.74E-02
EU38-B	120,000	1,000.00	4,380.00	2.3	1.92E-02	8.40E-02	4,406.03	3.2	2.59E-02	1.13E-01
EU41	120,000	617.65	2,705.29	2.3	1.18E-02	5.19E-02	2,721.37	3.2	1.60E-02	7.01E-02
EU42	120,000	617.65	2,705.29	2.3	1.18E-02	5.19E-02	2,721.37	3.2	1.60E-02	7.01E-02
EU47	120,000	376.47	1,648.94	2.3	7.22E-03	3.16E-02	1,658.74	3.2	9.75E-03	4.27E-02
			2.40E+04			4.60E-01	24,155.40			6.22E-01
IS	120,000	3,529.41	15,458.82	2.3	6.76E-02	2.96E-01	15,550.69	3.2	9.14E-02	4.00E-01
IS	120,000	305.88	1,339.76	2.3	5.86E-03	2.57E-02	1,347.73	3.2	7.92E-03	3.47E-02
IS	120,000	396.47	1,736.54	2.3	7.60E-03	3.33E-02	1,746.86	3.2	1.03E-02	4.50E-02
IS	120,000	111.06	486.44	2.3	2.13E-03	9.32E-03	489.33	3.2	2.88E-03	1.26E-02
IS	120,000	117.65	515.29	2.3	2.25E-03	9.88E-03	518.36	3.2	3.05E-03	1.33E-02
IS	120,000	411.76	1,803.53	2.3	7.89E-03	3.46E-02	1,814.25	3.2	1.07E-02	4.67E-02
			21,340.39			4.09E-01	21,467.21			5.53E-01
Permit Group #	CO ₂ Emission Factor (lb/MMscf)(a)	CO ₂ Emission Rate (lb/hr)	CO ₂ Potential Emissions (tons/yr)	CH ₄ Emission Factor (lb/MMscf)(a)	CH ₄ Emission Rate (lb/hr)	CH ₄ Potential Emissions (tons/yr)	CO ₂ e Emissions (tons/yr)(b)	Ammonia Emission Factor (lb/MMscf)	Ammonia Emission Rate (lb/hr)	Ammonia Emissions (tons/yr)
EU	120,000	5,482.35	24,012.71	2.3	1.05E-01	4.60E-01	24,155.40	3.2	1.42E-01	6.22E-01
IS	120,000	4,872.24	21,340.39	2.3	9.34E-02	4.09E-01	21,467.21	3.2	1.26E-01	5.53E-01
N/A	120,000	10,354.59	45,353.10	2.3	1.98E-01	8.69E-01	45,622.61	3.2	2.68E-01	1.17E+00

Notes:

EU = Emission Unit

(a) Criteria Air Poll

(b) CO₂e Emission

(c) Ammonia Emission

(d) Natural Gas Combustion

(e) Particulate emissions

Pinnacle Engineering, Inc.
7389 Airport View Dr. SW
Rochester, MN 55902

CNH Industrial America LLC
Fargo, ND

Combustion Hazardous Air Pollutants (HAPs) (d)									
Emission Unit #	Arsenic Emission Factor (lb/MMscf)	Arsenic Emission Rate (lb/hr)	Arsenic Emissions (tons/yr)	Benzene Emission Factor (lb/MMscf)	Benzene Emission Rate (lb/hr)	Benzene Emissions (tons/yr)	Benzene Emission Factor (lb/MMscf)	Dichlorobenzene Emission Rate (lb/hr)	Dichlorobenzene Emissions (tons/yr)
EU19-B	2.0E-04	2.16E-06	9.45E-06	2.1E-03	2.26E-05	9.92E-05	1.2E-03	1.29E-05	5.67E-05
EU20-A	2.0E-04	5.10E-07	2.23E-06	2.1E-03	5.35E-06	2.34E-05	1.2E-03	3.06E-06	1.34E-05
EU20-B2	2.0E-04	9.80E-07	4.29E-06	2.1E-03	1.03E-05	4.51E-05	1.2E-03	5.88E-06	2.58E-05
EU20-B3	2.0E-04	1.14E-06	4.98E-06	2.1E-03	1.19E-05	5.23E-05	1.2E-03	6.82E-06	2.99E-05
EU38-B	2.0E-04	1.67E-06	7.30E-06	2.1E-03	1.75E-05	7.67E-05	1.2E-03	1.00E-05	4.38E-05
EU41	2.0E-04	1.03E-06	4.51E-06	2.1E-03	1.08E-05	4.73E-05	1.2E-03	6.18E-06	2.71E-05
EU42	2.0E-04	1.03E-06	4.51E-06	2.1E-03	1.08E-05	4.73E-05	1.2E-03	6.18E-06	2.71E-05
EU47	2.0E-04	6.27E-07	2.75E-06	2.1E-03	6.59E-06	2.89E-05	1.2E-03	3.76E-06	1.65E-05
			4.00E-05			4.20E-04			2.40E-04
IS	2.0E-04	5.88E-06	2.58E-05	2.1E-03	6.18E-05	2.71E-04	1.2E-03	3.53E-05	1.55E-04
IS	2.0E-04	5.10E-07	2.23E-06	2.1E-03	5.35E-06	2.34E-05	1.2E-03	3.06E-06	1.34E-05
IS	2.0E-04	6.61E-07	2.89E-06	2.1E-03	6.94E-06	3.04E-05	1.2E-03	3.96E-06	1.74E-05
IS	2.0E-04	1.85E-07	8.11E-07	2.1E-03	1.94E-06	8.51E-06	1.2E-03	1.11E-06	4.86E-06
IS	2.0E-04	1.96E-07	8.59E-07	2.1E-03	2.06E-06	9.02E-06	1.2E-03	1.18E-06	5.15E-06
IS	2.0E-04	6.86E-07	3.01E-06	2.1E-03	7.21E-06	3.16E-05	1.2E-03	4.12E-06	1.80E-05
			3.56E-05			3.73E-04			2.13E-04
Permit Group #	Arsenic Emission Factor (lb/MMscf)	Arsenic Emission Rate (lb/hr)	Arsenic Emissions (tons/yr)	Benzene Emission Factor (lb/MMscf)	Benzene Emission Rate (lb/hr)	Benzene Emissions (tons/yr)	Dichlorobenzene Emission Factor (lb/MMscf)	Dichlorobenzene Emission Rate (lb/hr)	Dichlorobenzene Emissions (tons/yr)
EU	2.0E-04	9.14E-06	4.00E-05	2.1E-03	9.59E-05	4.20E-04	1.2E-03	5.48E-05	2.40E-04
IS	2.0E-04	8.12E-06	3.56E-05	2.1E-03	8.53E-05	3.73E-04	1.2E-03	4.87E-05	2.13E-04
N/A	2.0E-04	1.73E-05	7.56E-05	2.1E-03	1.81E-04	7.94E-04	1.2E-03	1.04E-04	4.54E-04

Notes:

EU = Emission Unit

(a) Criteria Air Poll

(b) CO2e Emission

(c) Ammonia Emis

(d) Natural Gas Co

(e) Particulate emis

Pinnacle Engineering, Inc.
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Rochester, MN 55902

CNH Industrial America LLC
Fargo, ND

Combustion

Emission Unit #	Beryllium Emission Factor (lb/MMscf)	Beryllium Emission Rate (lb/hr)	Beryllium Emissions (tons/yr)	Cadmium Emission Factor (lb/MMscf)	Cadmium Emission Rate (lb/hr)	Cadmium Emissions (tons/yr)	Chromium Emission Factor (lb/MMscf)	Chromium Emission Rate (lb/hr)	Chromium Emissions (tons/yr)
EU19-B	1.2E-05	1.29E-07	5.67E-07	1.1E-03	1.19E-05	5.20E-05	1.4E-03	1.51E-05	6.61E-05
EU20-A	1.2E-05	3.06E-08	1.34E-07	1.1E-03	2.80E-06	1.23E-05	1.4E-03	3.57E-06	1.56E-05
EU20-B2	1.2E-05	5.88E-08	2.58E-07	1.1E-03	5.39E-06	2.36E-05	1.4E-03	6.86E-06	3.01E-05
EU20-B3	1.2E-05	6.82E-08	2.99E-07	1.1E-03	6.25E-06	2.74E-05	1.4E-03	7.96E-06	3.49E-05
EU38-B	1.2E-05	1.00E-07	4.38E-07	1.1E-03	9.17E-06	4.02E-05	1.4E-03	1.17E-05	5.11E-05
EU41	1.2E-05	6.18E-08	2.71E-07	1.1E-03	5.66E-06	2.48E-05	1.4E-03	7.21E-06	3.16E-05
EU42	1.2E-05	6.18E-08	2.71E-07	1.1E-03	5.66E-06	2.48E-05	1.4E-03	7.21E-06	3.16E-05
EU47	1.2E-05	3.76E-08	1.65E-07	1.1E-03	3.45E-06	1.51E-05	1.4E-03	4.39E-06	1.92E-05
			2.40E-06			2.20E-04			2.80E-04
IS	1.2E-05	3.53E-07	1.55E-06	1.1E-03	3.24E-05	1.42E-04	1.4E-03	4.12E-05	1.80E-04
IS	1.2E-05	3.06E-08	1.34E-07	1.1E-03	2.80E-06	1.23E-05	1.4E-03	3.57E-06	1.56E-05
IS	1.2E-05	3.96E-08	1.74E-07	1.1E-03	3.63E-06	1.59E-05	1.4E-03	4.63E-06	2.03E-05
IS	1.2E-05	1.11E-08	4.86E-08	1.1E-03	1.02E-06	4.46E-06	1.4E-03	1.30E-06	5.68E-06
IS	1.2E-05	1.18E-08	5.15E-08	1.1E-03	1.08E-06	4.72E-06	1.4E-03	1.37E-06	6.01E-06
IS	1.2E-05	4.12E-08	1.80E-07	1.1E-03	3.77E-06	1.65E-05	1.4E-03	4.80E-06	2.10E-05
			2.13E-06			1.96E-04			2.49E-04
Permit Group #	Beryllium Emission Factor (lb/MMscf)	Beryllium Emission Rate (lb/hr)	Beryllium Emissions (tons/yr)	Cadmium Emission Factor (lb/MMscf)	Cadmium Emission Rate (lb/hr)	Cadmium Emissions (tons/yr)	Chromium Emission Factor (lb/MMscf)	Chromium Emission Rate (lb/hr)	Chromium Emissions (tons/yr)
EU	1.2E-05	5.48E-07	2.40E-06	1.1E-03	5.03E-05	2.20E-04	1.4E-03	6.40E-05	2.80E-04
IS	1.2E-05	4.87E-07	2.13E-06	1.1E-03	4.47E-05	1.96E-04	1.4E-03	5.68E-05	2.49E-04
N/A	1.2E-05	1.04E-06	4.54E-06	1.1E-03	9.49E-05	4.16E-04	1.4E-03	1.21E-04	5.29E-04

Notes:

EU = Emission Unit

(a) Criteria Air Poll

(b) CO2e Emission

(c) Ammonia Emis

(d) Natural Gas Co

(e) Particulate emis

Pinnacle Engineering, Inc.
7389 Airport View Dr. SW
Rochester, MN 55902

CNH Industrial America LLC
Fargo, ND

Combustion

Emission Unit #	Cobalt Emission Factor (lb/MMscf)	Cobalt Emission Rate (lb/hr)	Cobalt Emissions (tons/yr)	Formaldehyde Emission Factor (lb/MMscf)	Formaldehyde Emission Rate (lb/hr)	Formaldehyde Emissions (tons/yr)	Hexane Emission Factor (lb/MMscf)	Hexane Emission Rate (hr)	Hexane Emissions (tons/yr)
EU19-B	8.4E-05	9.06E-07	3.97E-06	7.5E-02	8.09E-04	3.54E-03	1.8E+00	1.94E-02	8.50E-02
EU20-A	8.4E-05	2.14E-07	9.38E-07	7.5E-02	1.91E-04	8.37E-04	1.8E+00	4.59E-03	2.01E-02
EU20-B2	8.4E-05	4.12E-07	1.80E-06	7.5E-02	3.68E-04	1.61E-03	1.8E+00	8.82E-03	3.86E-02
EU20-B3	8.4E-05	4.78E-07	2.09E-06	7.5E-02	4.26E-04	1.87E-03	1.8E+00	1.02E-02	4.48E-02
EU38-B	8.4E-05	7.00E-07	3.07E-06	7.5E-02	6.25E-04	2.74E-03	1.8E+00	1.50E-02	6.57E-02
EU41	8.4E-05	4.32E-07	1.89E-06	7.5E-02	3.86E-04	1.69E-03	1.8E+00	9.26E-03	4.06E-02
EU42	8.4E-05	4.32E-07	1.89E-06	7.5E-02	3.86E-04	1.69E-03	1.8E+00	9.26E-03	4.06E-02
EU47	8.4E-05	2.64E-07	1.15E-06	7.5E-02	2.35E-04	1.03E-03	1.8E+00	5.65E-03	2.47E-02
			1.68E-05			1.50E-02			3.60E-01
IS	8.4E-05	2.47E-06	1.08E-05	7.5E-02	2.21E-03	9.66E-03	1.8E+00	5.29E-02	2.32E-01
IS	8.4E-05	2.14E-07	9.38E-07	7.5E-02	1.91E-04	8.37E-04	1.8E+00	4.59E-03	2.01E-02
IS	8.4E-05	2.78E-07	1.22E-06	7.5E-02	2.48E-04	1.09E-03	1.8E+00	5.95E-03	2.60E-02
IS	8.4E-05	7.77E-08	3.41E-07	7.5E-02	6.94E-05	3.04E-04	1.8E+00	1.67E-03	7.30E-03
IS	8.4E-05	8.24E-08	3.61E-07	7.5E-02	7.35E-05	3.22E-04	1.8E+00	1.76E-03	7.73E-03
IS	8.4E-05	2.88E-07	1.26E-06	7.5E-02	2.57E-04	1.13E-03	1.8E+00	6.18E-03	2.71E-02
			1.49E-05			1.33E-02			3.20E-01
Permit Group #	Cobalt Emission Factor (lb/MMscf)	Cobalt Emission Rate (lb/hr)	Cobalt Emissions (tons/yr)	Formaldehyde Emission Factor (lb/MMscf)	Formaldehyde Emission Rate (lb/hr)	Formaldehyde Emissions (tons/yr)	Hexane Emission Factor (lb/MMscf)	Hexane Emission Rate (hr)	Hexane Emissions (tons/yr)
EU	8.4E-05	3.84E-06	1.68E-05	7.5E-02	3.43E-03	1.50E-02	1.8E+00	8.22E-02	3.60E-01
IS	8.4E-05	3.41E-06	1.49E-05	7.5E-02	3.05E-03	1.33E-02	1.8E+00	7.31E-02	3.20E-01
N/A	8.4E-05	7.25E-06	3.17E-05	7.5E-02	6.47E-03	2.83E-02	1.8E+00	1.55E-01	6.80E-01

Notes:

EU = Emission Un

(a) Criteria Air Poll

(b) CO2e Emission

(c) Ammonia Emis

(d) Natural Gas Co

(e) Particulate emis

Pinnacle Engineering, Inc.
7389 Airport View Dr. SW
Rochester, MN 55902

Crenlo Cab Products, Inc. Plant 2
Permit Reissuance Update
3/27/2024

**CNH Industrial America LLC
Fargo, ND**

Combustion

Emission Unit #	Manganese Emission Factor (lb/MMscf)	Manganese Emission Rate (lb/hr)	Manganese Emissions (tons/yr)	Mercury Emission Factor (lb/MMscf)	Mercury Emission Rate (lb/hr)	Mercury Emissions (tons/yr)	Naphthalene Emission Factor (lb/MMscf)	Naphthalene Emission Rate (lb/hr)	Naphthalene Emissions (tons/yr)
EU19-B	3.8E-04	4.10E-06	1.79E-05	2.6E-04	2.80E-06	1.23E-05	6.1E-04	6.58E-06	2.88E-05
EU20-A	3.8E-04	9.69E-07	4.24E-06	2.6E-04	6.63E-07	2.90E-06	6.1E-04	1.55E-06	6.81E-06
EU20-B2	3.8E-04	1.86E-06	8.16E-06	2.6E-04	1.27E-06	5.58E-06	6.1E-04	2.99E-06	1.31E-05
EU20-B3	3.8E-04	2.16E-06	9.46E-06	2.6E-04	1.48E-06	6.48E-06	6.1E-04	3.47E-06	1.52E-05
EU38-B	3.8E-04	3.17E-06	1.39E-05	2.6E-04	2.17E-06	9.49E-06	6.1E-04	5.08E-06	2.23E-05
EU41	3.8E-04	1.96E-06	8.57E-06	2.6E-04	1.34E-06	5.86E-06	6.1E-04	3.14E-06	1.38E-05
EU42	3.8E-04	1.96E-06	8.57E-06	2.6E-04	1.34E-06	5.86E-06	6.1E-04	3.14E-06	1.38E-05
EU47	3.8E-04	1.19E-06	5.22E-06	2.6E-04	8.16E-07	3.57E-06	6.1E-04	1.91E-06	8.38E-06
			7.60E-05			5.20E-05			1.22E-04
IS	3.8E-04	1.12E-05	4.90E-05	2.6E-04	7.65E-06	3.35E-05	6.1E-04	1.79E-05	7.86E-05
IS	3.8E-04	9.69E-07	4.24E-06	2.6E-04	6.63E-07	2.90E-06	6.1E-04	1.55E-06	6.81E-06
IS	3.8E-04	1.26E-06	5.50E-06	2.6E-04	8.59E-07	3.76E-06	6.1E-04	2.02E-06	8.83E-06
IS	3.8E-04	3.52E-07	1.54E-06	2.6E-04	2.41E-07	1.05E-06	6.1E-04	5.65E-07	2.47E-06
IS	3.8E-04	3.73E-07	1.63E-06	2.6E-04	2.55E-07	1.12E-06	6.1E-04	5.98E-07	2.62E-06
IS	3.8E-04	1.30E-06	5.71E-06	2.6E-04	8.92E-07	3.91E-06	6.1E-04	2.09E-06	9.17E-06
			6.76E-05			4.62E-05			1.08E-04
Permit Group #	Manganese Emission Factor (lb/MMscf)	Manganese Emission Rate (lb/hr)	Manganese Emissions (tons/yr)	Mercury Emission Factor (lb/MMscf)	Mercury Emission Rate (lb/hr)	Mercury Emissions (tons/yr)	Naphthalene Emission Factor (lb/MMscf)	Naphthalene Emission Rate (lb/hr)	Naphthalene Emissions (tons/yr)
EU	3.8E-04	1.74E-05	7.60E-05	2.6E-04	1.19E-05	5.20E-05	6.1E-04	2.79E-05	1.22E-04
IS	3.8E-04	1.54E-05	6.76E-05	2.6E-04	1.06E-05	4.62E-05	6.1E-04	2.48E-05	1.08E-04
N/A	3.8E-04	3.28E-05	1.44E-04	2.6E-04	2.24E-05	9.83E-05	6.1E-04	5.26E-05	2.31E-04

Notes:

EU = Emission Unit

(a) Criteria Air Poll

(b) CO2e Emission

(c) Ammonia Emis

(d) Natural Gas Co

(e) Particulate emis

Pinnacle Engineering, Inc.

7389 Airport View Dr. SW

Rochester, MN 55902

CNH Industrial America LLC
Fargo, ND

Combustion									
Emission Unit #	Nickel Emission Factor (lb/MMscf)	Nickel Emission Rate (lb/hr)	Nickel Emission (tons/yr)	Selenium Emission Factor (lb/MMscf)	Selenium Emission Rate (lb/hr)	Selenium Emissions (tons/yr)	Toluene Emission Factor (lb/MMscf)	Toluene Emission Rate (lb/hr)	Toluene Emissions (tons/yr)
EU19-B	2.1E-03	2.26E-05	9.92E-05	2.4E-05	2.59E-07	1.13E-06	3.4E-03	3.67E-05	1.61E-04
EU20-A	2.1E-03	5.35E-06	2.34E-05	2.4E-05	6.12E-08	2.68E-07	3.4E-03	8.67E-06	3.80E-05
EU20-B2	2.1E-03	1.03E-05	4.51E-05	2.4E-05	1.18E-07	5.15E-07	3.4E-03	1.67E-05	7.30E-05
EU20-B3	2.1E-03	1.19E-05	5.23E-05	2.4E-05	1.36E-07	5.98E-07	3.4E-03	1.93E-05	8.47E-05
EU38-B	2.1E-03	1.75E-05	7.67E-05	2.4E-05	2.00E-07	8.76E-07	3.4E-03	2.83E-05	1.24E-04
EU41	2.1E-03	1.08E-05	4.73E-05	2.4E-05	1.24E-07	5.41E-07	3.4E-03	1.75E-05	7.67E-05
EU42	2.1E-03	1.08E-05	4.73E-05	2.4E-05	1.24E-07	5.41E-07	3.4E-03	1.75E-05	7.67E-05
EU47	2.1E-03	6.59E-06	2.89E-05	2.4E-05	7.53E-08	3.30E-07	3.4E-03	1.07E-05	4.67E-05
			4.20E-04			4.80E-06			6.80E-04
IS	2.1E-03	6.18E-05	2.71E-04	2.4E-05	7.06E-07	3.09E-06	3.4E-03	1.00E-04	4.38E-04
IS	2.1E-03	5.35E-06	2.34E-05	2.4E-05	6.12E-08	2.68E-07	3.4E-03	8.67E-06	3.80E-05
IS	2.1E-03	6.94E-06	3.04E-05	2.4E-05	7.93E-08	3.47E-07	3.4E-03	1.12E-05	4.92E-05
IS	2.1E-03	1.94E-06	8.51E-06	2.4E-05	2.22E-08	9.73E-08	3.4E-03	3.15E-06	1.38E-05
IS	2.1E-03	2.06E-06	9.02E-06	2.4E-05	2.35E-08	1.03E-07	3.4E-03	3.33E-06	1.46E-05
IS	2.1E-03	7.21E-06	3.16E-05	2.4E-05	8.24E-08	3.61E-07	3.4E-03	1.17E-05	5.11E-05
			3.73E-04			4.27E-06			6.05E-04
Permit Group #	Nickel Emission Factor (lb/MMscf)	Nickel Emission Rate (lb/hr)	Nickel Emission (tons/yr)	Selenium Emission Factor (lb/MMscf)	Selenium Emission Rate (lb/hr)	Selenium Emissions (tons/yr)	Toluene Emission Factor (lb/MMscf)	Toluene Emission Rate (lb/hr)	Toluene Emissions (tons/yr)
EU	2.1E-03	9.59E-05	4.20E-04	2.4E-05	1.10E-06	4.80E-06	3.4E-03	1.55E-04	6.80E-04
IS	2.1E-03	8.53E-05	3.73E-04	2.4E-05	9.74E-07	4.27E-06	3.4E-03	1.38E-04	6.05E-04
N/A	2.1E-03	1.81E-04	7.94E-04	2.4E-05	2.07E-06	9.07E-06	3.4E-03	2.93E-04	1.29E-03

Notes:

EU = Emission Unit

(a) Criteria Air Poll

(b) CO₂e Emission

(c) Ammonia Emis

(d) Natural Gas Co

(e) Particulate emis

Pinnacle Engineering, Inc.
7389 Airport View Dr. SW
Rochester, MN 55902

CNH Industrial America LLC
Fargo, ND

Combustion					
Emission Unit #	POM Emission Factor (lb/MMscf)	POM Emission Rate (lb/hr)	POM Emissions (tons/yr)	Combined HAP Emission Rate (lb/hr)	Combined HAP Emissions (tons/yr)
EU19-B	8.5E-05	9.21E-07	4.03E-06	2.04E-02	8.92E-02
EU20-A	8.5E-05	2.18E-07	9.53E-07	4.81E-03	2.11E-02
EU20-B2	8.5E-05	4.19E-07	1.83E-06	9.26E-03	4.05E-02
EU20-B3	8.5E-05	4.86E-07	2.13E-06	1.07E-02	4.70E-02
EU38-B	8.5E-05	7.12E-07	3.12E-06	1.57E-02	6.89E-02
EU41	8.5E-05	4.40E-07	1.93E-06	9.72E-03	4.26E-02
EU42	8.5E-05	4.40E-07	1.93E-06	9.72E-03	4.26E-02
EU47	8.5E-05	2.68E-07	1.17E-06	5.92E-03	2.59E-02
			1.71E-05		3.78E-01
IS	8.5E-05	2.51E-06	1.10E-05	5.55E-02	2.43E-01
IS	8.5E-05	2.18E-07	9.53E-07	4.81E-03	2.11E-02
IS	8.5E-05	2.82E-07	1.24E-06	6.24E-03	2.73E-02
IS	8.5E-05	7.90E-08	3.46E-07	1.75E-03	7.66E-03
IS	8.5E-05	8.37E-08	3.67E-07	1.85E-03	8.11E-03
IS	8.5E-05	2.93E-07	1.28E-06	6.48E-03	2.84E-02
			1.52E-05		3.36E-01
Permit Group #	POM Emission Factor (lb/MMscf)	POM Emission Rate (lb/hr)	POM Emissions (tons/yr)	Combined HAP Emission Rate (lb/hr)	Combined HAP Emissions (tons/yr)
EU	8.5E-05	3.90E-06	1.71E-05	8.63E-02	3.78E-01
IS	8.5E-05	3.47E-06	1.52E-05	7.67E-02	3.36E-01
N/A	8.5E-05	7.37E-06	3.23E-05	1.63E-01	7.14E-01

Notes:

EU = Emission Unit

(a) Criteria Air Poll

(b) CO₂e Emission

(c) Ammonia Emis

(d) Natural Gas Co

(e) Particulate emis

Pinnacle Engineering, Inc.
7389 Airport View Dr. SW
Rochester, MN 55902

Crenlo Cab Products, Inc. Plant 2
Permit Reissuance Update
3/27/2024

EU46 - Emergency Natural Gas Generator Properties

	HP	BTU/hr	Hours Operated	MMBTU/yr
Generator Maximum Capacity	164	416,962	500	208.48

Note. 1 hp = 2,544 BTUs

Emergency Natural Gas Generator Emissions

Pollutant	Emission Factor	Units	Emissions (lbs/yr)	Emissions (tons/yr)
PM	0.00991	lb/MMBTU	2.07	0.0010
PM10	0.0000771	lb/MMBTU	0.02	0.0000
PM2.5	0.0000771	lb/MMBTU	0.02	0.0000
SO2	0.000588	lb/MMBTU	0.12	0.0001
Nox	4.08	lb/MMBTU	850.60	0.4253
CO	0.557	lb/MMBTU	116.12	0.0581
VOC	0.118	lb/MMBTU	24.60	0.0123
CO2	110	lb/MMBTU	22,932.89	11.4664
Methane	1.25	lb/MMBTU	260.60	0.1303
CO2e			29,447.91	14.72
2-Methylnaphthalene	3.32E-05	lb/MMBTU	6.92E-03	3.46E-06
Acenaphthene	1.25E-06	lb/MMBTU	2.61E-04	1.30E-07
Acenaphthylene	5.53E-06	lb/MMBTU	1.15E-03	5.76E-07
Benzo(b)fluoranthene	1.66E-07	lb/MMBTU	3.46E-05	1.73E-08
Benzo(e)pyrene	4.15E-07	lb/MMBTU	8.65E-05	4.33E-08
Benzo(g,h,i)perylene	4.14E-07	lb/MMBTU	8.63E-05	4.32E-08
Chrysene	6.93E-07	lb/MMBTU	1.44E-04	7.22E-08
Fluoranthene	1.11E-06	lb/MMBTU	2.31E-04	1.16E-07
Fluorene	5.67E-06	lb/MMBTU	1.18E-03	5.91E-07
Phenanthrene	1.04E-05	lb/MMBTU	2.17E-03	1.08E-06
Pyrene	1.36E-06	lb/MMBTU	2.84E-04	1.42E-07
POM Total	6.02E-05	lb/MMBTU	1.26E-02	6.28E-06
1,1,2,2-Tetrachloroethane	4.00E-05	lb/MMBTU	0.01	0.000
1,1,2-Trichloroethane	3.18E-05	lb/MMBTU	0.01	0.000
1,3-Butadiene	2.67E-04	lb/MMBTU	0.06	0.000
1,3-Dichloropropene	2.64E-05	lb/MMBTU	0.01	0.000
2,2,4-Trimethylpentane	2.50E-04	lb/MMBTU	0.05	0.000
Acetaldehyde	8.36E-03	lb/MMBTU	1.74	0.001
Acrolein	5.14E-03	lb/MMBTU	1.07	0.001
Benzene	4.40E-04	lb/MMBTU	0.09	0.000
Biphenyl	2.12E-04	lb/MMBTU	0.04	0.000
Carbon Tetrachloride	3.67E-05	lb/MMBTU	0.01	0.000
Chlorobenzene	3.04E-05	lb/MMBTU	0.01	0.000
Chloroform	2.85E-05	lb/MMBTU	0.01	0.000
Ethylbenzene	3.97E-05	lb/MMBTU	0.01	0.000
Ethylene Dibromide	4.43E-05	lb/MMBTU	0.01	0.000
Formaldehyde	5.28E-02	lb/MMBTU	11.01	0.0055
Methanol	2.50E-03	lb/MMBTU	0.52	0.000
Methylene Chloride	2.00E-05	lb/MMBTU	0.00	0.000
n-Hexane	1.11E-03	lb/MMBTU	0.23	0.000
Naphthalene	7.44E-05	lb/MMBTU	0.02	0.000
PAH	2.69E-05	lb/MMBTU	0.01	0.000
Phenol	2.40E-05	lb/MMBTU	0.01	0.000
Styrene	2.36E-05	lb/MMBTU	0.00	0.000
Tetrachloroethane	2.48E-06	lb/MMBTU	0.00	0.000
Toluene	4.08E-04	lb/MMBTU	0.09	0.000
Vinyl Chloride	1.49E-05	lb/MMBTU	0.00	0.000
Xylenes	1.84E-04	lb/MMBTU	0.04	0.000
Combined HAPs			15.05	0.0075

1. Emission Factors were taken from AP42 Chapter 3.2-2 Uncontrolled Emission Factors for 4-Stroke Lean-Burn Engines.
2. Per EPA Guidance, for emergency genrators we assumed 500-hours of potential operation.