September 5, 2002

Robert G. Johnson
Emery Forwarding
(f/k/a Emery Worldwide, Inc.)
1 Emery Plaza Drive
Vandalia, OH 45377-9703

Re: Exempt Construction and Operation Status
065-15844-00026

Dear Mr. Johnson:

The application from Emery Forwarding, received on July 9, 2002, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that your emission source, a cargo container manufacturing and repairing shop located at 1810 Troy Avenue, New Castle, IN 47362-5360, is classified as exempt from air pollution permit requirements. The emission source consists of a vinyl adhesive application operation, in which the adhesives are applied to vinyl manually.

The following conditions shall be applicable:

1. Any change or modification which may increase the source's potential VOC emissions to 2.28 pounds per hour or more must be approved by the Office of Air Quality (OAQ) before such change may occur. The registration requirement in 326 IAC 2-5.5 applies at this level.

2. Any change or modification which may increase the source's potential combined hazardous air pollutant (HAP) emissions to 25 tons per year or more, or any individual HAP emission to 10 tons per year or more, must be approved by OAQ before such change may occur. The maximum achievable control technology (MACT) requirement in 326 IAC 2-4.1-1 (New Source Toxics Control) applies at these levels.

3. Any change or modification which may increase actual VOC emissions to fifteen pounds per day or greater must be approved by the OAQ before such change can occur. Rule 326 IAC 8-2-11 would apply at this level.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ARD
cc: File - Henry County
Henry County Health Department
Air Compliance Section Inspector - D.J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	**Emery Forwarding**
Source Location:	**1810 Troy Avenue, New Castle, IN 47362-5360**
County:	**Henry**
SIC Code:	**3087**
Operation Permit No.:	**065-7806-00026**
Operation Permit Issuance Date:	**February 1, 2000**
Application No.:	**065-15844-00026**
Reviewer:	**Allen R. Davidson**

On July 9, 2002, the Office of Air Quality (OAQ) received an application from Emery Forwarding relating to the construction and operation of a vinyl adhesive application operation, in which the adhesives are applied to vinyl manually.

History

Emery Worldwide, Inc. was issued a Part 70 permit for a cargo container manufacturing and repairing shop located at 1810 Troy Avenue, New Castle, Indiana on February 1, 2000. However, all of the facilities listed in that permit have since been removed from operation. The applicant has requested revocation of the Part 70 permit. That request has been performed in another action 065-16513. The emission source will be evaluated as a new emission source for purposes of this review.

Enforcement Issues

There are no enforcement actions pending against this emission source.

Stack Summary

There are no stacks associated with this emission source.

Recommendation

The staff recommends to the Commissioner that the emission source be issued an exemption letter. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 9, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations. (2 pages)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material

combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

The following table reflects the existing source potential to emit. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit:

Pollutant	Potential To Emit (tons/year)
PM	0
PM-10	0
SO_2	0
VOC	1.4
CO	0
NO_x	0

HAP's	Potential To Emit (tons/year)
Methyl Ethyl Ketone	1.0
Toluene	0.4
TOTAL	1.4

The potential to emit (as defined in 326 IAC 2-7-1(29)) volatile organic compounds (VOC) is less than ten tons per year. Therefore, the application does not require review under 326 IAC 2-5.1 and can be classified as exempt under 326 IAC 2-1.1-3.

This is not a major source for PSD or Emission Offset because the potential to emit every attainment pollutant is less than the significant levels. Therefore, pursuant to 326 IAC 2-2, 326 IAC 2-3, and 40 CFR 52.21, the PSD and Emission Offset requirements do not apply.

County Attainment Status

The source is located in Henry County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Henry County has been designated as attainment for ozone and for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 20 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The source does not have potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAPs.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it does not have the potential to emit more than one hundred (100) tons per year of any pollutant specified in the rule.

State Rule Applicability - Adhesive Application

326 IAC 8-2-11 (Fabric and Vinyl Coating)

This emission unit is not subject to 326 IAC 8-2-11. Pursuant to 326 IAC 8-2-1 (Applicability), the rule is not applicable since the actual volatile organic compound (VOC) emissions are less than 15 pounds per day before controls. The operation has potential emissions less than fifteen pounds per day. Therefore, the actual emissions have to be less than fifteen pounds per day.

326 IAC 8-1-6 (General VOC Reduction Requirements)

This facility is not subject to 326 IAC 8-1-6 (General Reduction Requirements) because the potential to emit volatile organic compounds is less than twenty-five (25) tons per year. Therefore, the BACT (best available control technology) requirements do not apply.

Conclusion

The construction and operation of this emission source shall be subject to the conditions of the attached exemption, No. 065-15844-00026.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Emery Forwarding
Address City IN Zip: 1810 Troy Ave. New Castle, IN 47362
ID: 065-15844-00026
Reviewer: Allen R. Davidson
Date: 09/06/02

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
HH-66 Vinyl Cement	7.34	86.50%	21.5%	65.0%	25.6%	0.00%	0.068	1.000	6.41	4.77	0.33	7.80	1.42	0.00	ERR	100%

State Potential Emissions **Add worst case coating to all solvents** **0.33** **7.80** **1.42** **0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Emery Forwarding
Address City IN Zip: 1810 Troy Ave. New Castle, IN 47362
ID: 065-15844-00026
Reviewer: Allen R. Davidson
Date: 09/06/02

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % HAP#1	Weight % HAP#2	Weight % HAP#3	Weight % HAP#4	Weight % HAP#5	Weight % HAP#6	Weight % HAP#7	Emissions HAP#1 (ton/yr)	Emissions HAP#2 (ton/yr)	Emission s HAP#3 (ton/yr)	Emissions HAP#4 (ton/yr)	Emissions HAP#5 (ton/yr)	Emissions HAP#6 (ton/yr)	Emissions HAP#7 (ton/yr)
HH-66 Vinyl Cement	7.34	0.06813	1.00000	46.00%	19.00%						1.01	0.42	0.00	0.00	0.00	0.00	0.00
Total State Potential Emissions											**1.01**	**0.42**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

METHODOLOGY

Total for all: 1.42

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

LEGEND

HAP#1 =	Methyl Ethyl Ketone
HAP#2 =	Toluene
HAP#3 =	n/a
HAP#4 =	n/a
HAP#5 =	n/a
HAP#6 =	n/a
HAP#7 =	n/a