



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant  
DATE: April 17, 2006  
RE: Valley Distributing, Inc. / 039-22890-00651  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FN-REGIS.dot 03/23/06



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

William R. Harris  
Valley Distributing, Inc.  
52918 Lillian Street  
Elkhart, Indiana 46515

April 17, 2006

Re: Registered Construction and Operation Status  
No.: 039-22890-00651

Dear Mr. Harris:

The application from Valley Distributing, Inc., received on April 4, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following truck accessory coating operation, located at 52918 Lillian Street, Elkhart, Indiana 46515, is classified as registered:

- (a) One (1) surface coating booth used to coat metal substrates, identified as paint booth No. 1, constructed in 2005, using an air atomized spray gun, with a maximum usage rate of one (1) gallon of coating per hour, using dry filters to control emissions and exhausting through stack No. 1.
- (b) Two (2) GTC-4000 C Thermo-Cycler natural gas-fired industrial heaters, identified as H1 and H2, constructed in 2005, each rated at 0.25 MMBtu/hr, exhausting to general ventilation.
- (c) Eight (8) welding stations, identified as WELD #1 through #8, to be constructed in 2006, with a maximum steel wire consumption of 0.424 pounds per hour per station, exhausting to general ventilation.

The following conditions shall be applicable:

- (a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (b) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds for air dried or forced warm air dried coatings per gallon of coating, excluding water, as delivered to the applicator at the surface coating booth identified as paint booth No. 1.

- (c) Compliance with the VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (d) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the surface coating booth identified as paint booth No. 1 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.
- (e) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating booth identified as paint booth No.1 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (f) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (g) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

**Compliance Data Section  
Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

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.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Heather Jackson, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Jackson. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100

North Senate Avenue, Indianapolis, Indiana, 46204-2251 or call (800) 451-6027, ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by  
Nisha Sizemore, Chief  
Permits Branch  
Office of Air Quality

ERG/HJ

cc: File – Elkhart County  
Elkhart County Health Department  
Air Compliance – Anthony Pelath  
Northern Regional Office  
Permit Tracking  
Compliance Data Section  
Office of Enforcement

<b>Registration Annual Notification</b>
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This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

<b>Company Name:</b>	<b>Valley Distributing, Inc.</b>
<b>Address:</b>	<b>52918 Lillian Street</b>
<b>City:</b>	<b>Elkhart, Indiana 46515</b>
<b>Authorized individual:</b>	<b>William R. Harris, III, General Manager</b>
<b>Phone #:</b>	<b>(574) 266-4555</b>
<b>Registration #:</b>	<b>039-22890-00651</b>

I hereby certify that Valley Distributing, Inc. is still in operation and is in compliance with the requirements of Registration No.: 039-22890-00651.

<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

**Indiana Department of Environmental Management  
Office of Air Quality**

Technical Support Document (TSD) for a Registration

**Source Background and Description**

Source Name:	Valley Distributing, Inc.
Source Location:	52918 Lillian Street, Elkhart, Indiana 46515
County:	Elkhart
SIC Code:	0394
Registration No.:	039-22890-00651
Permit Reviewer:	ERG/HJ

The Office of Air Quality (OAQ) has reviewed an application from Valley Distributing, Inc. relating to the construction and operation of a truck accessory coating operation.

**Permitted Emission Units and Pollution Control Equipment**

There are no permitted emission units operating at this source at this time.

**Unpermitted Emission Units and Pollution Control Equipment**

The source consists of the following unpermitted emission units:

- (a) One (1) surface coating booth used to coat metal substrates, identified as paint booth No. 1, constructed in 2005, using an air atomized spray gun, with a maximum usage rate of one (1) gallon of coating per hour, using dry filters to control emissions and exhausting through stack No. 1.
- (b) Two (2) GTC-4000 C Thermo-Cycler natural gas-fired industrial heaters, identified as H1 and H2, constructed in 2005, each rated at 0.25 MMBtu/hr, exhausting to general ventilation.

**New Emission Units and Pollution Control Equipment**

The following emission unit will be constructed at this source:

- (c) Eight (8) welding stations, identified as WELD #1 through #8, to be constructed in 2006, with a maximum steel wire consumption of 0.424 pounds per hour per station, exhausting to general ventilation.

**Existing Approvals**

There are no existing approvals for this source.

**Enforcement Issue**

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S1	Paint Booth No. 1	20	3	14,400	Ambient

### Recommendation

The staff recommends to the Commissioner that the operation be approved. 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.

A complete application for the purposes of this review was received on April 4, 2006.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 5).

### Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit 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 department, or the appropriate local air pollution control agency.”

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	11.3
PM10	11.3
SO <sub>2</sub>	1.31x10 <sup>-3</sup>
VOC	15.4
CO	0.18
NO <sub>x</sub>	0.22

HAPs	Potential to Emit (tons/year)
Benzene	0.33
Cumene	0.03
Xylene	5.50
Total HAPs	5.86

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants is less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants is less than 25 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-6.1.

- (d) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM, PM10, and VOC is greater than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A registration will be issued.
- (e) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
PM 2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Elkhart County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) emissions are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as nonattainment for 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (c) Elkhart County has been classified as in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Source Status**

New Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	0.11
PM10	0.11
SO <sub>2</sub>	1.31x10 <sup>-3</sup>
VOC	15.4
CO	0.18
NO <sub>x</sub>	0.22
Single HAP	5.50
Combination HAPs	5.86

- (a) This existing source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories.

Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

### **Part 70 Permit Determination**

#### **326 IAC 2-7 (Part 70 Permit Program)**

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The source does not perform surface coating operations of metal furniture. Therefore, the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 - 60.316, Subpart EE) are not included in this permit.
- (c) This source does not apply the surface coating to any business machines. Therefore, the New Source Performance Standards for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60.720 - 60.726, Subpart TTT) are not included in this permit.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in this permit.
- (e) This new source is not a major source of HAPs. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Miscellaneous Metal Parts and Products Surface Coating (40 CFR 63, Subpart MMMM) and the NESHAP for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP) are not included in this permit.
- (f) This new source does not perform surface coating of wood furniture. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ) are not included in this permit.

### **State Rule Applicability – Entire Source**

#### **326 IAC 2-6 (Emission Reporting)**

This source is located in Elkhart County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### **326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The operation of the surface coating booth identified as Paint Booth No. 1 emits less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, the provisions of 326 IAC 2-4.1 do not apply.

**State Rule Applicability – Surface Coating Booth**

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Particulate from the surface coating booth identified as paint booth No.1 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

**326 IAC 8-2-9 (Miscellaneous Metal Coating)**

The surface coating booth identified as paint booth No.1 is subject to 326 IAC 8-2-9 because it was constructed after July 1, 1990 and actual VOC emissions from the booth exceed 15 lbs/day.

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds for air dried or forced warm air dried coatings per gallon of coating, excluding water, as delivered to the applicator at the surface coating booths.

Solvent spray from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as the solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth identified as paint booth No.1 is in compliance with this requirement.

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

The surface coating booth identified as paint booth No.1 is subject to 326 IAC 8-2-9, thus 326 IAC 8-1-6 does not apply.

**326 IAC 8-2-2 (Automobile and light duty truck coating operations)**

The surface coating booth identified as paint booth No.1 is not subject to 326 IAC 8-2-2 because this source is not an automotive or light duty truck assembly plant. The surface coating booth identified as paint booth No.1 is used to coat truck accessories, namely truck storage boxes.

### **State Rule Applicability – Natural Gas-fired Industrial Heater**

#### 326 IAC 6-3-2 (Particulate)

The two (2) natural gas-fired heaters, identified as H1 and H2, have potential emissions each of less than five hundred and fifty-one one thousands (0.551) pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the two (2) natural gas-fired heaters are exempt from 326 IAC 6-3-2.

#### 326 IAC 6-2-4 (Particulate)

The two (2) natural gas-fired heaters are not subject to 326 IAC 6-2-4 because they are not indirect-fired units.

#### 326 IAC 8-1-6 (Volatile Organic Compounds)

Pursuant to 326 IAC 8-1-6, the natural gas-fired heaters identified as H1 and H2 are not subject to the requirements of 326 IAC 8-1-6 because they have potential VOC emissions less than 25 tons per year.

### **State Rule Applicability – Welding**

#### 326 IAC 6-3-2 (Particulate)

Pursuant to 326 IAC 6-3-1(a)(9), the particulate matter emissions from each of the eight (8) welding stations identified as WELD #1-WELD #8 are exempt from 326 IAC 6-3-2 because they use less than six hundred twenty-five (625) pounds of wire per day.

#### 326 IAC 8-1-6 (Volatile Organic Compounds)

Pursuant to 326 IAC 8-1-6, the eight (8) welding stations, identified as WELD #1 through #8, are not subject to the requirements of 326 IAC 8-1-6 because they have potential VOC emissions less than 25 tons per year.

### **Conclusion**

The construction and operation of this truck accessory coating operation shall be subject to the conditions of Registration No.:039-22890-00651.

**Appendix A: Emission Calculations**

**VOC and Particulate  
From Surface Coating Operations**

**Company Name:** Valley Distributing, Inc.  
**Address City IN Zip:** 52918 Lillian St. Elkhart, IN. 46515  
**Registration Permit :** 039-22890-00651  
**Prepared by:** ERG/HJ  
**Date:** April 9, 2006

Material	Substrate	Density (lbs/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Maximum Usage (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	PTE of PM/PM10 (ton/yr)	PM/PM10 After Controls (tons/yr)	Control Efficiency	Transfer Efficiency
<b>Paint Booth No.1</b>															
Black Air Dry Enamel	metal	7.86	39.5%	0.00%	39.5%	2.50E-02	42.0	3.10	3.26	78.2	14.3	10.9	0.11	0.99	0.50
Hi SOL 10	metal	0.24	100%	0.00%	100%	2.50E-02	42.0	0.24	0.25	6.05	1.10	0.00	0.00	0.99	0.50
<b>Coating plus solvent</b>											<b>15.4</b>	<b>11.3</b>	0.11		

**NOTES**

- \* Assume all the PM emissions are equal to PM10 emissions.
- \*\* The surface coating will be applied using an air atomized spray gun. A transfer efficiency of 50% is assumed based on AP-40

**METHODOLOGY**

Pounds of VOC per Gallon Coating = Density (lbs/gal) \* Weight % Organics  
 PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit)  
 PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* (24 hr/day)  
 PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 PTE of PM/PM10 before Control (tons/yr) = Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency) \* (8760 hrs/yr) \*(1 ton/2000 lbs)  
 Particulate emissions after controls= Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency) \* (1-control efficiency)\*(8760 hrs/yr) \*(1 ton/2000 lbs)

**Company Name:** Valley Distributing, Inc.  
**Address City IN Zip:** 52918 Lillian St. Elkhart, IN. 46515  
**Registration Permit:** 039-22890-00651  
**Prepared by:** ERG/HJ  
**Date:** April 9, 2006

Material	Density (lbs/gal)	Maximum Usage (gal/unit)	Maximum Throughput (unit/hr)	Weight % Benzene	Weight % Cumene	Weight % Xylene	PTE of Benzene (tons/yr)	PTE of Cumene (tons/yr)	PTE of Xylene (tons/yr)	Total PTE of HAPs
<b>Paint Booth No.1</b>										
Black Air Dry Enamel	7.86	2.50E-02	42.0	0.00%	0.00%	15.0%	0.00	0.00	5.42	5.42
Hi SOL 10	0.24	2.50E-02	42.0	30.0%	3.00%	7.00%	0.33	0.03	0.08	0.44
<b>Total</b>							<b>0.33</b>	<b>0.03</b>	<b>5.50</b>	<b>5.86</b>

#### METHODOLOGY

$$\text{PTE of HAPs (tons/yr)} = \text{Density (lb/gal)} * \text{Gal of Material (gal/unit)} * \text{Maximum (unit/hr)} * \text{Weight \% HAP} * 8760 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs}$$

**Appendix A: Emission Calculations  
 Natural Gas Consumption  
 (MMBtu/hr <100)  
 From Natural Gas Combustion Units  
 two (2) natural gas fired heaters rated at 0.25 MMBtu/hr each**

**Company Name:** Valley Distributing, Inc.  
**Address:** 52918 Lillian St. Elkhart, IN. 46515  
**Registration Permit:** 039-22890-00651  
**Prepared by:** ERG/HJ  
**Date:** April 9, 2006

Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.5	4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO <sub>2</sub>	NOx	VOC	CO
	7.60	1.90	0.60	100 **see below	5.50	84.0
<b>PTE in tons/yr</b>	<b>0.02</b>	<b>4.16E-03</b>	<b>1.31E-03</b>	<b>0.2</b>	<b>0.01</b>	<b>0.2</b>

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factor for NOx: Uncontrolled = 100 lb/MMCF

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	0.00210	0.00120	0.07500	1.80000	0.00340
<b>PTE in tons/yr</b>	<b>4.60E-06</b>	<b>2.63E-06</b>	<b>1.64E-04</b>	<b>3.94E-03</b>	<b>7.45E-06</b>

Emission Factor in lb/MMcf	HAPs - Metals					Total
	Lead	Cadmium	Chromium	Manganese	Nickel	
	0.0005	0.0011	0.0014	0.0004	0.0021	
<b>PTE in tons/yr</b>	<b>1.10E-06</b>	<b>2.41E-06</b>	<b>3.07E-06</b>	<b>8.32E-07</b>	<b>4.60E-06</b>	<b>4.13E-03</b>

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

PTE (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emission Calculations  
PM and HAP Emissions  
From Welding Operations**

Company Name: Valley Distributing, Inc.  
Address: 52918 Lillian St. Elkhart, IN. 46515  
Registration Permit: 039-22890-00651  
Prepared by: ERG/HJ  
Date: April 9, 2006

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Oxyacetylene(carbon steel)	8.00	0.42	0.0241	0.00032	0.000001	0.000001	0.00	0.00	0.00	0.00	0.00
<b>EMISSION TOTALS</b>											
Potential Emissions lbs/hr							2.53E-03	0.00	0.00	0.00	0.00
Potential Emissions lbs/day							0.06	2.59E-03	0.00	0.00	2.59E-03
<b>Potential Emissions tons/year</b>							<b>0.01</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>4.73E-04</b>

**NOTES**

\*Emission Factors are from AP 42-12.19.

**METHODOLOGY**

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emission Calculations**  
**PTE Summary**

**Company Name:** Valley Distributing, Inc.  
**Address:** 52918 Lillian St. Elkhart, IN. 46515  
**Registration Permit:** 039-22890-00651  
**Prepared by:** ERG/HJ  
**Date:** April 9, 2006

<b>Pollutant</b>	<b>Surface Coating</b>	<b>Welding</b>	<b>Natural Gas Combustion</b>	<b>Total (tpy)</b>
CO	0.00	0.00	0.18	<b>0.18</b>
NO <sub>x</sub>	0.00	0.00	0.22	<b>0.22</b>
PM	11.3	0.01	0.02	<b>11.3</b>
PM <sub>10</sub>	11.3	0.01	4.16E-03	<b>11.3</b>
SO <sub>2</sub>	0.00	0.00	1.31E-03	<b>1.31E-03</b>
VOC	15.4	0.00	0.01	<b>15.4</b>
Pb	0.00	0.00	1.10E-06	<b>1.10E-06</b>
Total HAP	5.86	4.73E-04	4.13E-03	<b>5.87</b>